Fosse Green Energy



Fosse Green Energy

EN010154

7.2 Planning Statement

VOLUME

7

Planning Act 2008 (as amended)

Regulation 5(2)(q)

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

18 July 2025

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Fosse Green Energy

Development Consent Order 202[ ]

7.2 Planning Statement (Tracked)

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Executive Summary

ES1 Fosse Green Energy Limited (the Applicant) is applying for a Development Consent Order (DCO) under section 37 of the Planning Act 2008 (PA 2008) for Fosse Green Energy (the Proposed Development).

ES2 The Proposed Development is defined as a National Significant Infrastructure Project (NSIP) under s14(1)(a), s15(1) and s15(2) of the PA 2008 and will comprise the construction, operation (including maintenance), and decommissioning of a ground-mounted solar PV generating station with battery storage, Onsite Substation, and associated infrastructure to generate and export/import electricity.

ES3 The associated infrastructure includes, but is not limited to, access provision, underground cabling, areas of landscaping and biodiversity enhancement, and a 400 kilovolt (kV) underground grid connection cable (approximately 10-kilometre (km)), connecting to the national electricity transmission network at a proposed National Grid substation near Navenby.

ES4 The application for development consent is submitted to the Planning Inspectorate, with the decision whether to grant consent being made by the Secretary of State for Energy Security and Net Zero (the Secretary of State) pursuant to the PA 2008.

ES5 In deciding the application, the Secretary of State must have regard to any national policy statement which has effect in relation to development of the description to which the application relates (a "relevant national policy statement"). In this case, the relevant national policy statements (NPS) comprise the Energy NPSs published in November 2023 which came into effect on 17 January 2024 and are the Overarching NPS for Energy (EN-1) (NPS EN-1), NPS for Renewable Energy Infrastructure (EN-3) (NPS EN-3); and NPS for Electricity Networks Infrastructure (EN-5) (NPS EN-5).

ES6 Paragraph 3.3.20 of NPS EN-1 states that that *"a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar"* and that *"Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure"* (paragraph 3.3.62). It adds in paragraph 3.3.63 that *"subject to any legal requirements, the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible."*

ES7 The urgent need for nationally significant renewable energy projects such as the Proposed Development is established. Given this urgent need, this Planning Statement considers and assesses the Proposed Development against national planning policy contained within the relevant energy NPSs, along with other relevant planning policy and matters the Applicant considers

are likely to be important and relevant to the Secretary of State's decision making.

ES8 The Planning Statement sets out that none of the limited exceptions in s104(4)-(8) of the PA 2008 apply with the focus for decision making with respect to the Proposed Development requiring the application of the planning balancing exercise pursuant to s104(2) and (3) of the PA 2008 Act. The Planning Statement provides a summary of the process of determination and the planning balance following the detailed appraisal of the Proposed Development.

ES9 In summary, it has been demonstrated that for decision making in accordance with s104 of the PA 2008, the Proposed Development seeks to avoid and mitigate impacts on the environment and sensitive receptors where possible, with the substantial benefits clearly and demonstrably outweighing the harms that would arise with the proposed mitigation measures in place. Adverse effects would be localised, short-term, temporary and/or reversible at the end of the Proposed Development's lifetime.

ES10 This Planning Statement demonstrates that overall, the Proposed Development accords with the relevant NPSs, and where required it has been demonstrated that any harm caused as a result of the Proposed Development is outweighed by the substantial benefits that are delivered. It is considered that even without applying the CNP presumption, the planning case is firmly in favour of development consent being granted.

ES11 The Applicant has demonstrated that the Proposed Development is in accordance with the Energy NPSs, the mitigation hierarchy has been applied and compliance with other legal and regulatory requirements has also been demonstrated. Therefore, it can be concluded the CNP presumption applies to the Proposed Development and accordingly should be taken into account in decision making.

ES12 There are no sensitive designations to prevent the Proposed Development help to deliver the CNP infrastructure to contribute to the UK's urgent requirement for the delivery of new renewable energy generation capacity and infrastructure.

ES13 As a result, the Proposed Development is in accordance with national energy policy, national planning policy and the relevant development plan documents when considered as a whole. None of the limited exceptions in S104(4)-(8) of the PA 2008 apply. The overall planning balance is, therefore, overwhelmingly in favour of the grant of development consent for the Proposed Development.

ES14 The Proposed Development will provide a significant amount of renewable energy over its 60-year lifetime supporting resilience, security and affordability of electricity supplies. It would be a critical part of the national portfolio of renewable energy generation that is required to decarbonise its energy supply quickly.

1. Introduction

1.1 Overview of the Proposed Development

1.1.1 This Planning Statement has been prepared on behalf of Fosse Green Energy Limited (the Applicant) to support to an application for a Development Consent Order (DCO) for Fosse Green Energy (the Proposed Development).

1.1.2 The Proposed Development will comprise the construction, operation (including maintenance) and decommissioning of a ground-mounted solar photovoltaic (PV) electricity generating station with battery storage, Onsite Substation and associated infrastructure to generate and export/import electricity.

1.1.3 The associated infrastructure includes, but is not limited to, access provision, underground cabling, areas of landscaping and biodiversity enhancement, and a 400 kilovolt (kV) underground grid connection cable (approximately 10-kilometre (km)), connecting to the national electricity transmission network at a proposed National Grid substation near Navenby. The proposed National Grid substation near Navenby does not form part of this DCO application. A planning application for the proposed National Grid substation near Navenby will be submitted to North Kesteven District Council and will be determined in accordance with the Town and Country Planning Act 1990.

1.1.4 The Proposed Development is defined as a Nationally Significant Infrastructure Project (NSIP) pursuant to s14(1)(a), s15(1) and s15(2) of the Planning Act 2008 (PA 2008) (Ref. 1), as an onshore generating station in England with a capacity exceeding 50 megawatts (MW) and therefore requires development consent.

1.1.5 The application for development consent (the application) will be submitted to the Planning Inspectorate, with the decision whether to grant consent being made by the Secretary of State for Energy Security and Net Zero (the Secretary of State) pursuant to the PA 2008.

1.1.6 The Proposed Development has two components, the Principal Site and the Cable Corridor (see **Figure 1-2: Site Boundary Plan** of the ES **[EN010154/APP/6.2]**). These components are:

a. the 'Principal Site', which contains the ground-mounted solar PV panels, Solar Stations, Battery Energy Storage System (BESS), Onsite Substation, planting and mitigation areas, interconnecting cables between solar PV areas and associated infrastructure; and

b. the 'Cable Corridor', which contains the 400kV underground grid connection cable and associated cables (the Grid Connection Cables) which will be installed between the Onsite Substation and the proposed National Grid substation near Navenby.

1.1.7 The Order Limits are shown on the **Location Plan [EN010154/APP/2.5]** and **Land Plans [EN010154/APP/2.1]**.

1.1.8 The Order Limits cover an area of approximately 1,368 hectares (ha) and include the land required for the construction, operation (including maintenance), and decommissioning of the Proposed Development. The Order Limits include the Principal Site and Cable Corridor. The Order Limits also include a section of the A46 which forms part of the Strategic Road Network, which is in the north of the Principal Site, between Thorpe on the Hill and Swinderby.

1.1.9 The Site lies wholly within the administrative areas of North Kesteven District Council and Lincolnshire County Council.

1.1.10 The Principal Site intersects the following Parish Council boundaries:

a. Thorpe on the Hill
b. Swinderby
c. Witham St Hughs
d. Thurlby
e. Norton Disney
f. Aubourn with Haddington
g. Bassingham

1.1.11 The Cable Corridor intersects the following Parish Council boundaries:

a. Coleby
b. Boothby Graffoe
c. Navenby

1.1.12 As the Proposed Development is a NSIP the DCO application must be decided in accordance with the relevant National Policy Statement(s) (NPS).

1.1.13 The Overarching National Policy Statement for Energy (EN-1) (NPS EN-1) (Ref. 2) which came into effect in January 2024, outlines the urgent need for renewable energy infrastructure in paragraphs 3.2.6 – 3.2.8. NPS EN-1 states in paragraph 3.2.7 that *"substantial weight should be given to this need"* by the Secretary of State when considering DCO applications under the PA 2008.

1.1.14 Paragraph 3.2.8 of NPS EN-1 highlights that: *"The Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established by this NPS*."

1.1.15 NPS EN-1 further states that "*the Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure*" (paragraph 3.3.62, reiterated by paragraph 4.2.4) and that the "*Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible*" (paragraph 3.3.63).

1.1.16 The urgent need for nationally significant renewable energy projects such as the Proposed Development is established.

1.2 The Applicant

1.2.1 The Applicant is a partnership between Windel Energy Limited and Recurrent Energy.

1.2.2 Founded in 2018, Windel Energy is a privately held company dedicated to driving the transition towards a sustainable future. Specialising in the origination, development and integration of renewable energy projects and low-carbon disruptive technologies, Windel Energy is at the forefront of clean energy innovation.

1.2.3 With a portfolio exceeding 5 gigawatts of renewable power in various stages of development, Windel's team of talented professionals bring a deep understanding and high level of expertise in land viability, electricity networks, planning (Town and Country Planning Act 1990, Developments of National Significance) and consenting for Nationally Significant Infrastructure Projects, legal processes and construction feasibility.

1.2.4 Windel Energy adopt a long-term ownership approach, ensuring the efficient operation and management of renewable assets. Leveraging an extensive network of relationships, institutional grade infrastructure and in-house industry expertise, Windel is committed to delivering impactful and enduring energy solutions.

1.2.5 Recurrent Energy, a subsidiary of Canadian Solar Inc., is one of the world's largest and most geographically diversified utility-scale solar and energy storage project development, ownership, and operations platforms. With an industry-leading team of in-house energy experts, Recurrent Energy serves as Canadian Solar's global development and power services business.

1.2.6 To date, Recurrent Energy has successfully developed, built, and connected approximately 12GWp of solar projects and more than 6GWh of energy storage projects across six continents. As of the date of this document, its global pipeline includes over 25GWp of solar and 69GWh of energy storage capacity.

1.3 Definition of the Proposed Development as a Nationally Significant Infrastructure Project

1.3.1 The Proposed Development is defined as a Nationally Significant Infrastructure Project (NSIP), as it consists of the construction of an onshore generating station in England with a capacity exceeding 50 megawatts (MW) in accordance with s14(1)(a), s15(1) and s15(2) of the PA 2008.

1.3.2 Associated development and other ancillary works are also proposed as part of the Proposed Development and are included within the application for development consent. The NSIP and associated development are defined in Schedule 1 of the **Draft Development Consent Order (DCO) [EN010154/APP/3.1]** and explained in the **Explanatory Memorandum to Draft DCO [EN010154/APP/3.2]**.

1.3.3 The Development Consent Order may include provisions which remove the requirements to obtain other consents. A **Consents and Agreements Position Statement [EN010154/APP/3.3]** explains those other consents and licenses that are or may be required under other legislation.

1.4 EIA Development

1.4.1 The Proposed Development comprises 'Schedule 2' development under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) (Ref. 6):

1.4.2 It is considered that due to the nature, size and location of the Proposed Development, it has the potential to have significant effects on the environment and as such, the Proposed Development is a development for which an Environmental Impact Assessment (EIA) is required. This is discussed further in **Chapter 5: EIA Methodology and Consultation** of the Environmental Statement (ES) **[EN010154/APP/6.1]**.

1.4.3 The content of the ES is based on the Scoping Opinion, published in July 2023 by the Planning Inspectorate and set out within **Appendix 1-B EIA Scoping Opinion** of the ES **[EN010154/APP/6.3]**.

1.5 Achieving Good Design

1.5.1 As set out in the **Design Approach Document [EN010154/APP/7.3]**, the Applicant has sought to achieve good design outcomes from an early stage. At the site selection stage, as set out in the **Site Selection Report, Appendix A** to this Planning Statement, a site was identified that was as least environmentally constrained as possible, and through the production of clear Design Vision and Principles, the design of the Proposed Development has evolved with a clear structure, based on the site context and national and local policy including the criteria for good design set out in paragraphs 4.7.5 to 4.7.9 of NPS EN-1 and guidance contained in the Planning Inspectorate's Advice for Good Design (The Planning Inspectorate, 2024). In addition, feedback received at Non-Statutory and Statutory Consultation, technical engagement

with stakeholders and ongoing environmental assessment has also informed the design evolution of the Proposed Development.

1.5.2 The application of the Design Vision and Principles has resulted in sustainable infrastructure that is sensitive to place, has minimal impacts on heritage assets, efficient use of natural resources, matched by an appearance that demonstrates good aesthetic as far as possible, in accordance with paragraph 4.7.2 of NPS EN-1.

1.6 Purpose and Structure of the Planning Statement

1.6.1 The Planning Statement is submitted alongside supplementary documents which support the application for development consent, in accordance with regulation 5(2)(q) and regulation 6(1)(a)) of the Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 (as amended) (the APFP Regulations) (Ref. 4).

1.6.2 This Planning Statement considers and assesses the Proposed Development against national planning policy contained within the relevant energy NPSs, along with other relevant planning policy and matters the Applicant considers are likely to be important and relevant to the Secretary of State's decision making.

1.6.3 The remainder of the Planning Statement is structured as follows:

a. Section 2 – outlines the decision-making framework, legislation and policy context as well as other important and relevant matters;

b. Section 3 – describes the Order Limits and the surrounding areas and summarises the relevant planning history;

c. Section 4 – provides a summary of the Proposed Development;

d. Section 5 – describes the need and the benefits of the Proposed Development;

e. Section 6 – provides an assessment of the Proposed Development against the NPS and other important and relevant matters. The assessment sets out how the Proposed Development complies with planning policy and where there is conflict to then determine the weight of this against the Proposed Development within the overall planning balance;

f. Section 7 – sets out the process of decision making and includes an assessment of the overall planning balance of the Proposed Development having regard to the outcome of the planning appraisal set out in Section 6, as well as consideration of the application of the CNP presumption;

g. Section 8 – provides an overall conclusion;

h. Appendix A: Site Selection Report – sets out the methodology for choosing the Site;

i. Appendix B: NPS Accordance Tables – sets out an appraisal of the Proposed Development against the policies in the relevant NPSs;

j. Appendix C: Local Policy Accordance Tables – sets out an appraisal of the Proposed Development against relevant and important local policies; and

k. Appendix D: Planning History – sets out the relevant planning applications to the DCO Site.

1.7 Relationship of the Planning Statement to the Application

1.7.1 In assessing compliance of the Proposed Development with the Energy NPSs and other relevant and important matters, this Planning Statement draws upon the conclusions of other documents that form part of and support the Application. This Planning Statement should therefore be read alongside the following documents:

a. **Draft Development Consent Order [EN010154/APP/3.1];**

b. **Consultation Report [EN010154/APP/5.1] and Appendices [EN010154/APP/5.2];**

c. **Environmental Statement (ES) [EN010154/APP/6.1], Figures [EN010154/APP/6.2], Appendices [EN010154/APP/6.3] and ES Non-Technical Summary [EN010154/APP/6.4];**

d. **Statement of Need [EN010154/APP/7.1];**

e. **Design Approach Document [EN010154/APP/7.3];**

f. **Proposed Development Parameters [EN010154/APP/7.4];**

g. **Framework Construction Environmental Management Plan (CEMP) [EN010154/APP/7.7];**

h. **Framework Operational Environmental Management Plan (OEMP) [EN010154/APP/7.8];**

i. **Framework Decommissioning Environmental Management Plan (DEMP) [EN010154/APP/7.9];**

j. **Framework Soil Management Plan (SMP) [EN010154/APP/7.10];**

k. **Biodiversity Net Gain Report [EN010154/APP/7.12];**

l. **Habitats Regulations Assessment (HRA) [EN010154/APP/7.13];**

m. **Framework Public Rights of Way Management Plan (PRoW-MP) [EN010154/APP/7.14];**

n. **Framework Landscape and Ecological Management Plan (LEMP) [EN010154/APP/7.15];**

o. **Framework Employment, Skills, and Supply Chain Plan (ESSCP) [EN010154/APP/7.16];**

p. **Framework Battery Safety Management Plan (BSMP) [EN010154/APP/7.17]; and**

q. **Framework Construction Traffic Management Plan (CTMP) [EN010154/APP/7.18].**

1.7.2 The **Section 55 Checklist [EN010154/APP/1.5]** and the **Introduction to the Application [EN010154/APP/1.2]** set out the structure of the application and how the application satisfies the relevant requirements of legislation and guidance concerning the preparation and submission of applications for development consent.

1.7.3 The full schedule of documents submitted with this application is set out in the **Electronic Application Index [EN010154/APP/1.6]**.

2. Legislative and Policy Context

2.1 Introduction

2.1.1 This section outlines the legislative framework and the planning policy context for the Proposed Development including the relationship of the Proposed Development with the PA 2008, the energy NPSs and other planning policy that could be considered to be important and relevant in the decision-making process.

2.1.2 This section of the Planning Statement is supported by **Appendix B: NPS Accordance Tables** and **Appendix C: Local Policy Accordance Tables** which set out how the Proposed Development is in accordance with the relevant energy NPSs and local planning policy.

2.2 The basis for decision-making

Planning Act 2008

2.2.1 The PA 2008 provides the legislative framework for decision making and defines the application process under which consent for NSIPs is sought.

2.2.2 The Proposed Development is defined as an NSIP under s14(1)(a), s15(1) and s15(2) of the PA 2008 as it meets the following criteria:

a. The Proposed Development comprises the construction of a generating station (s14(1)(a) of the PA 2008);

b. The construction of a generating station is within s14(1)(a) only if when constructed, it is expected to be within s15(2) (s15(1) of the PA 2008);

c. It would be located in England (s15(2)(a) of the PA 2008);

d. It would not generate electricity from wind (s15(2)(aa) of the PA 2008);

e. It would not be an offshore generating station (s15(2)(b) of the PA 2008); and

f. Its capacity would be more than 50MW (s15(2)(c) of the PA 2008).

2.2.3 As a result, the Applicant requires development consent under the PA 2008 in order to construct, operate and maintain the Proposed Development.

Associated Development

2.2.4 Sections 115(1) and 115(2) of the PA 2008 set out that a DCO may include consent for development which *"is associated with the development"* for which development consent is required.

2.2.5 The Department for Communities and Local Government (DCLG) (2013) (Ref. 34) has guidance on associated development applications for major

infrastructure projects which states in paragraph 6 that associated development will "*be typical of development brought forward alongside the relevant type of principal development or of a kind that is usually necessary to support a particular type of project*". Paragraph 5 of the guidance includes considerations which will be taken into account by the Secretary of State when determining whether (or not) development should be treated as associated development. Section 4.1 of this Planning Statement sets out further details on associated development.

Legislative and Policy Framework

2.2.6 Part 6 of the PA 2008 is to be applied when deciding an application for development consent.

2.2.7 S104(1) of the PA 2008 applies where a NPS has effect in relation to development of the description to which the application relates.

2.2.8 S104(2) of the PA 2008 states that the Secretary of State must have regard to the following in deciding an application for development consent:

a. Any relevant NPS (s104(2)(a) of the PA 2008);

b. The appropriate marine policy documents (if any) (s104(2)(aa) of the PA 2008);

c. Any local impact report (s104(2)(b) of the PA 2008);

d. Any matters prescribed in relation to development of the description to which the application relates (s(2)(c) of the PA 2008); and

e. Any other matters which the Secretary of State thinks are both important and relevant to the Secretary of State's decision (s104(2)(d) of the PA 2008).

2.2.9 Marine policy documents cover licensable development within the marine area and areas involved in fishing and shipping that are not subject to a marine licence. Neither such areas are within or adjacent to the Order Limits and are therefore not affected by the Proposed Development. The Secretary of State does not therefore need to have regard to marine policy documents in the determination of the DCO application.

2.2.10 Where an NPS has effect, s104(3) of the PA 2008 requires that the Secretary of State must decide an application for an NSIP in accordance with the relevant NPS, except in a limited number of circumstances which are set out in s104(4) to s104(8) which comprise the following:

a. If deciding the application in accordance with any relevant NPS would lead to the United Kingdom being in breach of its international obligations (s104(4));

b. If deciding the application in accordance with any relevant NPS would lead to the Secretary of State being in breach of any duty imposed on the Secretary of State by or under any enactment (s104(5));

c. If deciding the application in accordance with any relevant NPS would be unlawful by virtue of any enactment (s104(6));

d. If the adverse impact of the Proposed Development would outweigh its benefits (s104(7)); and

e. Any condition prescribed for deciding an application otherwise than in accordance with a NPS is met (s104(8)).

2.2.11 The above confirms that the Proposed Development is to be determined in accordance with any relevant NPS except to the extent that s104(4) to s104(8) of the PA 2008 apply.

2.2.12 In this case, the adopted Energy NPSs are of relevance to the Proposed Development, therefore s104(1) of the PA 2008 applies. The relevant Energy NPSs are set out in the following section of this Planning Statement.

2.2.13 Section 7 of this Planning Statement sets out how the Proposed Development complies with the tests in s104(4) to s104(8) of the PA 2008.

2.3 National Policy Statements

2.3.1 This section of the Planning Statement is supported by Section 6 of this Planning Statement and **Appendix B: NPS Accordance Tables** which identify the policies that the Secretary of State must have regard to when deciding the application and presents an appraisal of compliance with these policies. This is in accordance with s104(2) and s104(3) of the PA 2008.

2.3.2 The relevant NPSs comprise the Energy NPSs published in November 2023 which came into effect on 17 January 2024, as set out below:

a. Overarching NPS for Energy (EN-1) (NPS EN-1);

b. NPS for Renewable Energy Infrastructure (EN-3) (NPS EN-3);

c. NPS for Electricity Networks Infrastructure (EN-5) (NPS EN-5) (Ref. 3).

2.3.3 NPS EN-1 is the overarching NPS for Energy, NPS EN-3 comprises technology specific policy, which includes solar, while NPS EN-5 covers the Electricity Network, which in the case of the Proposed Development relates to the cable route corridor and the connection to the Proposed National Grid substation near Navenby.

2.3.4 Solar development falls under the definition of Critical National Priority (CNP) development under paragraph 4.2.5 of NPS EN-1 as it is onshore electricity generation that does not involve fossil fuel combustion. For projects which qualify as CNP, such as the Proposed Development, paragraph 4.1.7 of NPS EN-1 states that "*it is likely that the need case will outweigh the residual effects in all but the most exceptional cases*". This is because national policy acknowledges the contribution that CNP infrastructure plays in achieving the Government's energy objectives, together with national security, economic, commercial and net zero benefits (paragraph 3.3.63 of NPS EN-1).

2.3.5 NPS EN-1 states that solar, along with wind, is expected to be the main form of low carbon electricity generation which will help to reduce costs and provide clean and secure sources of electricity for the UK (paragraph 3.3.20 of NPS EN-1). Section 2.10 of NPS EN-3 (titled 'Solar Photovoltaic Generation') includes specific national planning policy with respect to NSIP scale solar PV developments. The Proposed Development will support the delivery of the Government's renewable energy policy set out in NPS EN-3 (Ref. 20) which commits to "*sustained growth*" in solar capacity to meet net zero emissions by 2050, with solar being "*a key part of the Government's strategy for low-cost decarbonisation of the energy sector*" (paragraph 2.10.9 of NPS EN-3).

2.4 Draft National Policy Statements

2.4.1 It is noted that the Government published revised drafts of the Energy National Policy Statements on 24 April 2025 for consultation, including EN-1 (draft NPS EN-1), EN-3 (draft NPS EN-3) and EN-5 (draft NPS EN-5).

2.4.2 The proposed amendments set out in draft NPS EN-1, draft NPS EN-3 and draft NPS EN-5 embed the Government's ambitions and commitments in the Clean Power 2030 Action Plan into the policy statements. This is highlighted in draft NPS EN-1 paragraph 2.3.4 which states *"We need to rapidly increase deployment of all relevant infrastructure to meet the Clean Power 2030 Mission capacity ranges and decarbonise the power sector*", and at draft NPS EN-1 paragraph 2.3.6, *"These renewable technologies will form the foundation of our clean power system, and we need to see very significant deployment to make this a reality."*

2.4.3 Due to the ongoing nature of the revision of the NPSs, the draft NPS EN-1, draft NPS EN-3 and draft NPS EN-5 will have limited weight in decision making. Although if adopted, they will be a material consideration in decision making. The draft NPSs demonstrate the Government's intention in relation to the production of low carbon energy generation, which reaffirms the need case for the Proposed Development.

2.4.4 A full policy accordance table has not been prepared due to the early and draft nature of the documents; however, the Applicant will keep under review the progress of the revised NPSs.

2.5 Local Impact Report

2.5.1 North Kesteven District Council and Lincolnshire County Council are the host authorities and will have the opportunity to prepare a Local Impact Report (LIR) following submission of the DCO application. The LIR will be considered by the Secretary of State in determining the DCO application.

2.5.2 The LIR should give *"details of the likely impact of the proposed development on the authority's area"* in accordance with s60 of the PA 2008 and guidance contained in Nationally Significant Infrastructure Projects: Advice for Local Authorities (Ref. 9).

2.6 Prescribed Matters

2.6.1 The prescribed matters referred to in s104(2)(c) of the PA 2008 are set out in the Infrastructure Planning (Decisions) Regulations 2010 (as amended) (the Decision Regulations). The Decisions Regulations relevant to the Proposed Development are:

a. Regulation 3 – the decision-maker must have regard to the desirability of preserving listed buildings, scheduled monuments and their settings, as well as the desirability of preserving or enhancing the character and appearance of conservation areas where the development would affect these. This is considered in this Planning Statement and **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]**; and

b. Regulation 7 – the Panel or Council must have regard to the United Nations Environmental Programme Convention on Biological Diversity of 1992. This is discussed in this Planning Statement and **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]**.

2.7 Other Important and Relevant Matters

Introduction

2.7.1 The Secretary of State may also consider other national and local policy and guidance to be 'important and relevant' to the decision-making process. For example parts of the National Planning Policy Framework (NPPF) (Ref. 10) and associated guidance within the Planning Practice Guidance (PPG) (Ref. 11) along with the Central Lincolnshire Local Plan (April 2023) and made Neighbourhood Plans may be considered as 'important and relevant' by the Secretary of State in accordance with s104(2)(d) of the PA 2008. The following sections discuss other national and local policy that will be important and relevant to the consideration of the Proposed Development.

Planning Policy

National Planning Policy Framework (December 2024)

2.7.2 The NPPF which was updated in December 2024 (and corrected in February 2025) sets out the Government's planning policies for England and for planning applications under the Town and Country Planning Act (TCPA) 1990 is a material planning consideration during determination.

2.7.3 Paragraph 5 of the NPPF makes clear that the NPPF does not contain specific policies for NSIPs and 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. The NPPF is considered to be of less relevance (although still considered to be important and relevant) to the Secretary of State's decision than the relevant Energy NPSs.

2.7.4 The NPPF is supported by the National Planning Practice Guidance (NPPG) and NPS EN-1 includes footnote references to the NPPG. Reference is made

to the NPPF and NPPG only for relevant matters within Section 6 of this Planning Statement.

Local Policy

2.7.5 Policies in Local Plans and Neighbourhood Plans are considered important and relevant matters and will be included within the content of LIRs, which the Secretary of State will have regard to in their decision making in accordance with the PA 2008.

2.7.6 **Appendix C: Local Policy Accordance Tables** of this Planning Statement identifies and provides an appraisal of the policies within the Local Plans and Neighbourhood Plans that the Secretary of State may consider to be important and relevant when determining the application, in accordance with s104(2) of the PA 2008.

Adopted Planning Policy

2.7.7 The Proposed Development lies within the administrative areas of North Kesteven District Council and Lincolnshire County Council. The Development Plan includes the following:

a. Central Lincolnshire Local Plan, adopted 13 April 2023 (Ref. 12);

b. Lincolnshire Minerals and Waste Local Plan including the Core Strategy & Development Management Policies Plan (Ref. 13) adopted in June 2016;

c. The Lincolnshire Minerals and Waste Local Plan Site Locations (Ref. 14) adopted in December 2017;

d. Thorpe on the Hill Neighbourhood Plan, made March 2018 (Ref. 15);

e. Bassingham Neighbourhood Plan, made November 2017 (Ref. 16); and

f. Coleby Neighbourhood Plan, made January 2018 (Ref. 17).

2.7.8 To support the implementation of the Central Lincolnshire Local Plan, North Kesteven District Council has also prepared Supplementary Planning Documents (SPD), although there are none that are relevant to the Proposed Development.

Emerging Planning Policy

2.7.9 It is acknowledged that there is an ongoing consultation (until 24 July 2025) on the emerging Biodiversity Net Gain (BNG) for Nationally Significant Infrastructure Projects (NSIPs) (Ref. 38) document, proposed to apply from May 2026. The proposal is for biodiversity gain objectives to be set out in biodiversity gain statements which will have the same effect as the National Policy Statements, to ensure new major infrastructure developments leave biodiversity in a measurably better state than before development took place helping contribute to the legally binding Environment Act 2021 targets for biodiversity, as well as providing wider benefits for climate change adaptation and mitigation. The document recognises that many NSIPs are already

delivering biodiversity gains through their schemes, and it supports this ambition.

2.7.10 It is also acknowledged that a consultation on the revised energy National Policy Statements took place between 24 April 2025 and 29 May 2025 as set out in Section 2.4 of this document.

2.7.11 Regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) (Ref. 18) sets out that local planning authorities must review local plans *"every five years, starting from the date of adoption"*. This is also set out in the NPPF.

2.7.12 Where emerging planning policy is at an advanced stage and considered important and relevant, this can be a material consideration in the determination of planning applications.

2.7.13 Lincolnshire County Council is preparing an updated Minerals and Waste Plan following the conclusions of a review published in February 2021. The new Minerals and Waste Local Plan is currently at an early stage of plan preparation. A consultation on the issues and options for updating the plan took place from 28 June 2022 to 12 August 2022 and a further consultation was undertaken between July 2024 and September 2024. The plan will be prepared in accordance with the published timetable which sets out that adoption of the plan is anticipated between winter 2024 and 2025. As such this plan has limited weight but may be considered important and relevant.

2.7.14 The following Neighbourhood Plans are in the process of being prepared and are within the Order Limits:

a. Eagle and Swinethorpe Neighbourhood Plan (draft plan in preparation); and

b. Swinderby Neighbourhood Plan (draft plan in preparation).

2.8 Other legal and regulatory requirements

2.8.1 In addition to the framework provided by the PA 2008, the Proposed Development is also required to meet the legal and regulatory requirements of the following:

a. Habitats Regulations Assessment under the Conservation of Habitats and Species Regulations 2017

b. Water Environment (Water Framework Directive) (England and Wales) Regulations 2017

c. Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009

d. The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

2.8.2 This Planning Statement demonstrates how the DCO application for the Proposed Development has complied with the legal and regulatory requirements set out above.

2.9 Other Legislation and Policy Considered to be Important and Relevant

2.9.1 Further national and international legislation and policy documents relating to renewable energy and climate change are discussed in more detail within the **Statement of Need [EN010154/APP/7.1]**, and include the following:

a. The Paris Agreement (Ref. 27);
b. Climate Change Act 2008 (Ref. 25);
c. The Carbon Budget Delivery Plan (Ref. 28);
d. 2020 Energy White Paper: Powering our Net Zero Future (Ref. 29);
e. The Net Zero Strategy: Build Back Greener 2021 (Ref. 26);
f. The British Energy Security Strategy (April 2022) (Ref. 30);
g. Powering Up Britain (March 2023);
h. Mission Zero Report (2023) (Ref. 32); and
i. Clean Power 2030: Action Plan (December 2024) (Ref. 31).

2.10 Pre-Application Consultation

2.10.1 As required by Regulation 10 of the EIA Regulations 2017 an EIA Scoping Report was submitted to the Planning Inspectorate on 19 June 2023. The Planning Inspectorate issued a Scoping Opinion on 25 July 2023 including formal responses received by the Planning Inspectorate from consultees.

2.10.2 Further to this, the Applicant undertook a Non-Statutory Consultation which ran for a period of 39 days from 11 September 2023 to 20 October 2023. Feedback was sought from a wide range of organisations including the Environment Agency, Historic England and Natural England, the host local authorities, North Kesteven District Council and Lincolnshire County Council, as well as landowners and the local community on early proposals for the Proposed Development. The feedback provided informed the design of the Proposed Development presented at Statutory Consultation. Further details are provided within the **Consultation Report [EN010154/APP/5.1]** and its supporting **Consultation Report Appendices [EN010154/APP/5.2]**.

2.10.3 S42 and s47 of the PA 2008 require applicants for NSIPs to carry out formal (statutory) pre-application consultation on their proposals. The Applicant undertook a Statutory Consultation between 21 October 2024 and 2 December 2024. Four in-person events and an online webinar was held. Feedback was sought on proposals for the Proposed Development, to inform the design evolution of the Proposed Development.

2.10.4 During Statutory Consultation, in accordance with s42, s43, s44 and s47 of the PA 2008, prescribed consultees were consulted including the Environment Agency, Historic England and Natural England, the host local authorities, North Kesteven District Council and Lincolnshire County Council, as well as landowners and the local community. A notification in accordance with s46 of the PA 2008 was sent to the Planning Inspectorate which provided information about the Proposed Development including the form of consultation and the Preliminary Environmental Information Report. A Statement of Community Consultation (SoCC), setting out how the local community would be consulted, was prepared and consulted upon with the host authorities in accordance with s47 of the PA 2008.

2.10.5 The **Consultation Report [EN010154/APP/5.1]** and the **Consultation Report Appendices [EN010154/APP/5.2]**, demonstrate how the Applicant has complied with the PA 2008, APFP Regulations and EIA Regulations in terms of the following:

a. prescribed consultees (s42);

b. the local community (s47);

c. publicising the proposed application (s48); and

d. having regard to consultation responses (s49).

2.10.6 The Applicant has had regard to all of the feedback it has received in accordance with s49 of the PA 2008. The **Consultation Report [EN010154/APP/5.1]** and the **Consultation Report Appendices [EN010154/APP/5.2]** set out how the feedback provided was considered.

2.11 Additional Consents

2.11.1 If granted, the DCO will have the effect of providing consent for the authorised development described in Schedule 1 of the **Draft Development Consent Order [EN010154/APP/3.1]**. The Applicant has sought to secure the rights over land (temporary and permanent) through voluntary negotiations and the **Draft Development Consent Order [EN010154/APP/3.1]** also seeks compulsory acquisition powers over land if it cannot be secured through voluntary agreement.

2.11.2 The **Draft Development Consent Order [EN010154/APP/3.1]** also contains provisions for the disapplication of certain relevant consenting requirements under s150 of the PA 2008. Details of the consents and licences to be disapplied in the **Draft Development Consent Order [EN010154/APP/3.1]** are explained in the **Explanatory Memorandum to Draft DCO [EN010154/APP/3.2]**.

2.11.3 In addition to the **Draft Development Consent Order [EN010154/APP/3.1]** there are a range of other consents, licences and permits that may be required to construct and operate the Proposed Development. These other consents, permits and licences are set out in the **Consents and Agreements Position Statement [EN010154/APP/3.3]**.

3. The Order Limits and Surrounding Context

3.1 Introduction

3.1.1 The following sections describe the land within and surrounding the Order Limits, in addition to setting out the relevant environmental designations and other environmental planning considerations. A detailed description of the Order Limits is available in **Chapter 2: The Site and Surroundings** of the ES **[EN010154/APP/6.1].**

3.2 The Order Limits

3.2.1 The Order Limits cover approximately 1,368 hectares (ha) of land and comprises the Principal Site, which is approximately 1070ha, and includes the Solar PV Array Area, and a Cable Corridor which is approximately 351ha although once constructed, the cable itself will comprise a smaller fraction of this. The Cable Corridor partially overlaps the Principal Site. Both the Principal Site and Cable Corridor are shown in **Figure 1-2: DCO Site** of the ES **[EN010154/APP/6.2]**.

3.2.2 The Order Limits include parts of the local road network. The A46 intersects the northern part of the Principal Site, whilst the A607 passes from north to south through the centre of the Cable Corridor. There are several farm access tracks and local minor roads located within the Order Limits.

3.2.3 Land within the Order Limits is predominantly arable fields interspersed with individual trees, small woodland blocks, hedgerows, linear tree belts, farm access tracks, and local transport roads. The hedgerows within the DCO Site are predominantly low and intermittent. Hedgerows on the boundaries of the DCO Site are typically well established and in excess of 2m in height. The arable fields are large and generally of regular shape. The nature of the landscape is largely flat with open views.

3.2.4 The River Witham and River Brant run through the Order Limits. The River Brant intersects the Cable Corridor north to south approximately 0.34km west of Broughton Lane. The River Witham passes through the Principal Site between Mill Lane and the area east of Thurlby.

Surrounding Context

3.2.5 The Site is located approximately 9km south and south west of Lincoln City Centre in a predominantly agricultural landscape surrounded by small rural villages. Within 1km of the Order Limits these include Thorpe on the Hill, Morton Hall, Morton, Witham St Hughs, Norton Disney, Bassingham, Thurlby, Haddington, Aubourn and Coleby.

3.2.6 The majority of roads surrounding the Order Limits are C roads, although there are a number of A and B roads. The closest A roads to the Order Limits include the A607, A15, A17, A46, and the A1434. The closest B roads include the B1178, B1202, and B1190. The A15 and A46 are the most significant roads for the Proposed Development, as they are likely to provide the key routes for construction vehicles. The A46 is part of the Strategic Road Network under the jurisdiction of National Highways. The A15, located 0.7km east of the Order Limits, connects Bracebridge Heath to Leasingham, running past Boothby Graffoe. The A46 directly intersects the Principal Site between Swinderby and Thorpe on the Hill. The A17 lies further from the Order Limits at approximately 5.5km south of the Order Limits at the closet point. The A17 connects Winthorpe with Sleaford at which point the A46 meets the A17.

3.2.7 Generally, the DCO Site is surrounded by open arable land with some woodland. Extending from the western boundary of the Order Limits, south of Moor Lane, there are several water bodies. These are located around Swinderby Road and were formed following the cessation of Swinderby Quarry. The largest of these is the lake south of Norton lane. There are further waterbodies located approximately 0.5km north east of the Order Limits at Thorpe on the Hill.

3.3 Environmental Designations and Allocations Within and Surrounding the Order Limits

3.3.1 Key environmental designations within and surrounding the Order Limits are shown on **Figure 2-1 Environmental Constraints** of the ES **[EN010154/APP/6.2]**. Further detail regarding the Order Limits and surrounding areas are provided in **Chapters 6 to 14** of the ES **[EN010154/APP/6.1]**.

Within the Order Limits

3.3.2 There are no statutory landscape designations within the Order Limits.

3.3.3 There are no statutory ecology designations such as Sites of Special Scientific Interest (SSSIs), Special Areas of Conservations (SACs), Special Protection Areas (SPAs) located within the Order Limits. Additionally, there are no Local Wildlife Sites (LWS). Further details of ecology within and surrounding the Order Limits is reported in **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]**.

3.3.4 There are no Scheduled Monuments, Listed Buildings, Conservation Areas, or other designated heritage assets, including World Heritage Sites, Registered Parks and Gardens or Registered Battlefields, located within the Order Limits as reported in **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]**. There are 44 non-designated heritage assets within the Site.

3.3.5 There is a designation for an Area of Great Landscape Value (AGLV), the Lincoln Cliff Area of Great Landscape Value, which runs from Lincoln to

Leadenham, passing through the Cable Corridor around Coleby and Boothby Graffoe.

3.3.6 The Principal Site and part of the Cable Corridor lie within National Character Area (NCA) 48: Trent and Belvoir vales and the remaining part of the Cable Corridor is located within NCA 47: Southern Lincolnshire Edge. The whole of the Principal Site and part of the Cable Corridor lies within 4a: Unwooded Vale of the East Midlands Regional Landscape Character Assessment Areas. The remaining portion of the Cable Corridor lies within 6a: Limestone Scarps and Dipslopes of the East Midlands Regional Landscape Character Assessment areas. The Principal Site lies partially within the Terrace Sandlands and Witham & Brant Vales District Landscape Areas. The Cable Corridor lies within Witham & Brant Vales, Lincoln Cliff, and Limestone Heath District Landscape Character Areas as identified in the North Kesteven District Landscape Character Assessment Report. Details of the spatial relationship between these designations and the DCO Site are provided in **Figure 10-4a: National and District Landscape Character Areas (LCA)** of the ES **[EN010154/APP/6.2], Figure 10-4b: East Midlands Regional LCA** of the ES **[EN010154/APP/6.2], and Figure 10-4c: National and District LCA** of the ES **[EN010154/APP/6.2]**. The AGLV affords conservation, enhancement, and protection to maintain the landscape character under Policy S62 (Areas of Outstanding National Beauty and Areas of Great Landscape Value) of the Central Lincolnshire Local Plan.

3.3.7 There are two District Landscape Character Areas (DLCA) (LCG4 and LCG6) and ten Local Landscape Character Areas (LLCA) (1, 3, 4, 6, 8, 9, 13, 14, 15, and 16) that relate to the Proposed Development. These identify key local landscape characteristics of the area. Further details can be found in **Figure 10-4A National Landscape Character Areas** of the ES **[EN010154/APP/6.2] and Figure 10-5 Local Landscape Character Areas** of the ES **[EN010154/APP/6.2]**. Details of the landscape character can be found in **Appendix 10-E Landscape Assessment** of the ES **[EN010154/APP/6.3]**.

3.3.8 The entirety of the Principal Site ~~includes the entirety of~~is within the Witham Valley Country Park, which is a protected green space for recreation. The Country Park covers approximately 40 square miles of countryside. Appendix E sets out the approximate Witham Valley Country Park boundary in relation to the Proposed Development.

3.3.9 The Order Limits are completely contained within the Witham Landscape Recovery Project Area. This project has received funding from Defra's Farming and Countryside Programme to create a connected nature-rich farmed landscape. The nature of the landscape is primarily arable with undulating landform across mainly open parcels of land. To note, the Central Lincolnshire Local Plan does not include reference to this area.

3.3.10 The vast majority of the Order Limits are located in areas at low risk of flooding (Flood Zone 1) although there are areas of Flood Zone 2 and 3 associated with the River Brant and the River Witham.

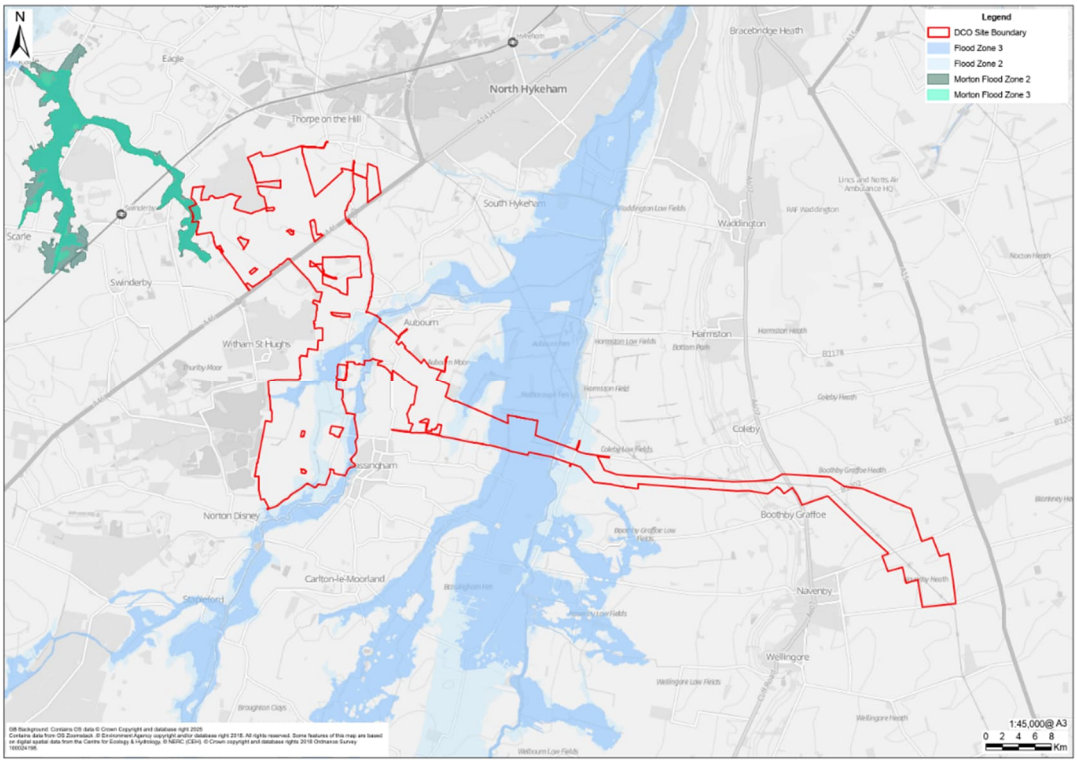


Plate 3-1 Fluvial flood risk map

3.3.11 There is an area of Flood Zone 3 located to the north west of the Principal Site, which extends north for approximately 3.5km. Located to the east of the Principal Site and north of the Cable Corridor there is an area of Flood Zone 3 which extends both north east, and to the south of the Principal Site and Cable Corridor, with some presence of Flood Zone 2, which extend to the south west. Further detail can be found in **Appendix 9-C Flood Risk Assessment** of the ES **[EN010154/APP/6.3]**.

3.3.12 The Principal Site is also located within a Sand and Gravel Area of Search as defined in the Lincolnshire Minerals and Waste Local Plan: Core Strategy and Development Management Policies (June 2016).

The Surrounding Area

3.3.13 There are no sites statutorily designated for their biodiversity value at an international or European level within 10km of the Order Limits. There are several national and local statutory designations for nature conservation within a 10km radius of the Order Limits. These include seven SSSI's and two Local Nature Reserves (LNR). The closest is Whisby Nature Park LNR, which is located 340 m north of the Principal Site. The locations of these sites can be seen in **Figure 8-1 Sites Statutorily Designated for Biodiversity Value** of the ES **[EN010154/APP/6.2]** and further details found in **Chapter 8 Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]**.

3.3.14 There are 29 non-statutory designations for biodiversity within 2km of the Order Limits, all of which are Local Wildlife Sites (LWS). There are 13 LWSs located within 1km, and 12 sites located between 1km and 2km of the Order

Limits. Further details can be found in **Figure 8-2 Sites Non-Statutorily Designated for their Biodiversity Value** of the ES **[EN010154/APP/6.2]**.

3.3.15 There are three areas of Ancient Woodland within 2km of the Order Limits. These comprise Tunman/Housham Woods immediately adjacent to the Principal Site; Hadwin's/Norton Big Wood approximately 850m west of the Cable Corridor; and Great Low Wood approximately 1.35km north west of the Principal Site.

3.3.16 Within 3km of the Order Limits there are 123 designated heritage assets which comprises five Scheduled Monuments, 114 listed buildings (seven grade I, six grade II* and 101 grade II), three conservation areas, and one grade II registered park and garden. Of these designated heritage assets a single grade II listed building, River Farmhouse (NHLE 1168186), is located within a land parcel excluded from, but surrounded by the Order Limits.

3.3.17 A further 13 designated heritage assets are located between 3km and 5km from the Order Limits. This includes two scheduled monuments, five Grade I and five Grade II* listed buildings and one Grade II* registered park and garden. Further details of heritage assets can be found in **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1].**

3.3.18 Within 3km of the Order Limits there are several planning allocations and designations as set out in the Central Lincolnshire Local Plan. This includes six housing allocations, three employment allocations, two District, Local and Village Centres, three Green Wedges, a Sustainable Urban Extension (SUE), Important Open Spaces, and Local Green Spaces.

3.3.19 There are six housing allocations identified in the Central Lincolnshire Local Plan that are located within 3km of the Order Limits. These are:

a. NK/WSH/002 (69.1ha with planning permission for 1,250 dwellings), this is adjacent to the Principal Site and extends from where Stone Lane meets the A46 to the west;

b. NK/BAS/007 (2.68ha without planning permission for 24 dwellings);

c. NK/BAS/010 (1.77ha with no planning permission for 35 dwellings);

d. NK/WELL/004 (1.56ha currently under construction with approval for 13 dwellings);

e. NK/WELL/002A (0.99ha with planning permission and approval for 17 dwellings); and

f. NK/NAV/005a (3.53ha under construction with approval for 62 dwellings).

3.3.20 There are three employment sites allocated under the Central Lincolnshire Local Plan within 3km of the Order Limits. The sites are E23, E25, and E3. E23 and E25 are Important Established Employment Areas (IEEAs) which are detailed under Policy S31 (Important Established Employment Areas) of the Central Lincolnshire Local Plan. These sites are over 2ha and have a minimum of 8,000sqm of ground floor space and five or more units occupied by different businesses. E3 is a Strategic Employment Site (SES) of 22.3ha with planning

permission granted and a masterplan approved with partial implementation in January 2022. SESs are subject to Policy S29 of the Central Lincolnshire Local Plan.

3.3.21 There is a Sustainable Urban Extension (SUE) located less than 3km north east of the Order Limits. The allocation is NK/NHYK/001 and guidance on development is provided under Policy S69 (Lincoln Sustainable Urban Extensions) of the Central Lincolnshire Local Plan. Proposals for the site include provision for approximately 2,000 dwellings, 5ha of employment land, and transport infrastructure amongst other things.

3.3.22 Under Policy S63 (Green Wedges) there is an allocated Green Wedge which lies within 3km to the north east of the Order Limits. Development in allocated Green Wedges is restricted with developers being required to meet certain criteria for any development.

3.3.23 There are several Local Green Spaces (LGS) within 3km of the Order Limits. These include LGS 151, LGS 158, and LGS 179. Policy S64 (Local Green Space) states development should be avoided on these sites albeit under very special circumstances.

3.3.24 There are also designations for important open spaces adjacent to the Principal Site. Open spaces are protected under Policy S65 (Important Open Space) of the Central Lincolnshire Local Plan. Policy S65 safeguards open spaces from development unless it can be shown there are no significant detrimental impacts on the character and appearance of the surrounding area, ecology and any heritage assets, or if there is an overprovision of that type of space within the community.

Other Environmental and Planning Considerations

Minerals

3.3.25 Some areas of the Proposed Development are located within Mineral Safeguarding Areas (MSA) for Sand and Gravel and Limestone. Further details can be found in Figure 1 of **Appendix 12-C Minerals Safeguarding Assessment** of the ES **[EN010154/APP/6.3]**. These include:

a. Sections of the south west, northern and central parts of the Principal Site which are located within a Sand and Gravel MSA. The area of MSA located within the Principal Site is approximately 23ha, and the area of the cable within the MSA is approximately 1.9ha; and

b. The eastern section of the Cable Corridor where the Proposed Development connects to the proposed National Grid substation near Navenby, is located within a Limestone MSA. The area of cable within the MSA is approximately 2.3ha.

3.3.26 There are three existing and operational sand and gravel mineral sites located within 2km of the Site, which include: Whisby Quarry, Swinderby Airfield, and Norton Bottoms Quarry. The closest is Swinderby Airfield which is located 300m from the Order Limits near Witham St Hughs. Details can be found in

Appendix 12-C Minerals Safeguarding Assessment of the ES **[EN010154/APP/6.3]**.

Agricultural Land

3.3.27 The land contained within the Principal Site is comprised primarily of Agricultural Land Classification (ALC) Grade 3b with some occurrences of ALC Grade 3a. There is no ALC Grade 1 or ALC Grade 2 land within the Principal Site.

3.3.28 An agricultural land quality survey was undertaken including 1,018.7ha of land in the Bassingham and Navenby areas within the Principal Site in April, May and October 2023, and later in August and October 2024. Overall, 15ha (1.5%) of the surveyed land was identified as non-agricultural including, urban, woodland or made ground. A small area of 18.4ha (1.8%) was inaccessible for survey; this was not extrapolated given it only represented two missing survey locations. Subgrade 3a (BMV land) extended to 282.9ha (27.8%) of the surveyed land, while 702.4ha (68.9) was ALC Subgrade 3b.

3.3.29 The western side of the Principal Site is predominately ALC Grade 3b land including land immediately north of the A46 and within the centre of the Principal Site. ALC Grade 3a land is mainly located to the north west of the A46, and within the central area of the south of the Principal Site.

3.3.30 Provisional ALC mapping from Natural England's 1970s Provisional Agricultural Land Classification and Agricultural Land Classification - Post 1988 Survey datasets show that land in the Cable Corridor is principally Grade 3 with some areas of Grade 2, east of the A607.

3.3.31 Further details are provided in **Appendix 12-B ALC Report** of the ES **[EN010154/APP/6.3]**.

Public Rights of Way

3.3.32 There are 27 public footpaths, three Bridleways, six restricted Byways, and seven permissive paths located within the Principal Site. These are mainly located north of the A46 and around the River Witham where it intersects the Order Limits. Within the Cable Corridor there are five PRoWs. The existing walking and cycling network is shown in **Figure 13-2 Existing Walking and Cycling Network** of the ES **[EN010154/APP/6.2]**.

3.3.33 There are a number of PRoWs which are located immediately surrounding the northern, western and eastern sections of the Principal Site. There are further PRoWs located south of the Cable Corridor near Navenby and to the east of the Cable Corridor.

3.3.34 There are no on or off road dedicated/marked cycling facilities on the roads immediately surrounding the Principal Site or Cable Corridor, although there is a cycle track on Stone Lane, which begins east of High Walks Farm.

3.3.35 Within the Principal Site there are some Bridleways and restricted byways. The Bridleways are within the northern extents of the Principal Site, whilst the

Restricted Byways lie within the eastern extents of the Site boundary. Within the Cable Corridor there are no Bridleways.

3.3.36 The Applicant is aware of a number of Definitive Map Modification Orders (DMMOs) within the vicinity of the Proposed Development which have been submitted to Lincolnshire County Council (LCC) for consultation. If any such modification orders are confirmed by LCC, where practicable, these PRoW will be managed during construction in a similar manner to the existing PRoW as set out in the **Framework PRoW Management Plan (PRoW-MP) [EN010154/APP/7.14]**.

Other Planning Considerations

3.3.37 The Order Limits fall within the Lincoln Strategy Area, which is the focus for the supply of housing growth (64% (24,244 dwellings) of the total to be delivered in the plan period (2018-2040) as set out in Policy S2 (Growth Levels and Distribution) of the Central Lincolnshire Local Plan.

3.4 Planning History

3.4.1 As described above, there is considerable development planned in the surrounding area, mainly relating to residential and employment uses. However, the planning history within the Order Limits is more limited consisting mostly of small scale planning applications relating to residential development and energy related development that has arisen in this location due to the proposed National Grid substation near Navenby, where multiple projects will be able to connect. A summary of the most relevant applications is provided below.

Battery Energy Storage Systems

3.4.2 A planning application was submitted in May 2025 to North Kesteven District Council (Ref: 25/0533/FUL) on land to the south of Coleby Low Fields to the west of the Grantham Rd by Navenby Energy Limited, a special purpose vehicle of NatPower UK Limited, for the proposed installation of BESS together with ancillary infrastructure, equipment and formation of access and landscaping work (known as Brant Energy Storage). This application at the time of writing is currently being determined. This proposed BESS is located within the Cable Corridor of the Proposed Development. The Applicant is engaging with NatPower to ensure a joined up approach and will continue to engage with this developer as the projects progress.

3.4.3 A BESS and associated infrastructure planning application (Ref: 25/0491/FUL) (known as Navenby BESS) has also been submitted to North Kesteven District Council in May 2025 by REWE 1 Limited. The Applicant for the Proposed Development is also the applicant for this planning application. This proposed BESS sits within the Cable Corridor on the land south of Green Man Road, towards the proposed National Grid substation near Navenby. At the time of writing this application is currently being determined. This application is primarily a standalone BESS and whilst there is an overlap between the location of the Cable Corridor there is no interrelationship

between Fosse Green Energy and the Navenby BESS application. They will be considered, determined, and constructed as separate development proposals. The two proposals are to operate independently with independent grid connections.

Solar NSIPs

3.4.4 The Proposed Development will connect into the proposed National Grid substation near Navenby alongside the Springwell and Leoda projects, both nationally significant solar projects requiring consent under the PA 2008. At the time of writing, the Springwell project is at Examination stage. The Leoda project undertook Non-Statutory Consultation in early 2025. The Order Limits of the Proposed Development overlap with the Springwell and Leoda projects at the proposed National Grid substation near Navenby.

3.4.5 Engagement between the Applicant and the applicants for the Springwell and Leoda projects has been undertaken during the pre-application stage and will continue as the project progresses. The Applicant has agreement that comments from any written representations from the Springwell and Leoda applications can be copied across the three projects for consistency at the appropriate time.

3.4.6 There are two further proposed solar NSIPs over 8km from the Order Limits. To the west is Great North Road Solar and Biodiversity Park submitted by Elements Green Trent Limited which is at pre-application stage at the time of writing. One Earth Solar farm submitted by One Earth Solar is to the north west of the Order Limits and at pre-examination stage at the time of writing.

Residential

3.4.7 A planning application for the erection of up to 1,100 dwellings and 150 care/retirement units (C2/C3), the formation of a roundabout to Camp Road, A46 junction improvement works, public open spaces and associated service infrastructure (outline with means of access) was submitted to North Kesteven District Council by Strawson Property Development Limited (Ref: 15/1347/OUT). The proposed development is located 123m from the Order Limits and approved in September 2019. Since this date, there have been multiple reserved matters and non-material amendment applications submitted since. Conditions were still being discharged for the application as recently as May 2025.

3.4.8 A second residential application (Ref: 18/0760/OUT), located adjacent to the Order Limits on land at Thorpe Lane for up to 144 dwellings and associated works, submitted by Taylor Lindsey Ltd and Pennells Holdings Ltd was approved in January 2021. Subsequent conditions have been discharged, and non-material amendments were approved in 2023.

Other

3.4.9 A utilities application (Ref: 22/0899/FUL) for the proposed Elsham to Lincoln Pipeline Scheme, which is primarily for potable water supply, was submitted

to North Kesteven District Council by Anglian Water Services Ltd and approved in February 2023. The proposed pipeline passes through the Cable Corridor near Navenby and continues northwards, east of the Order Limits circumnavigating Lincoln from east to west.

4. The Proposed Development

4.1 Introduction

4.1.1 This section provides a summary of the main components of the Proposed Development, and the proposed construction, operation, and decommissioning activities.

Definition of the Proposed Development in the DCO

4.1.2 The **Draft Development Consent Order [EN010154/APP/3.1]** states that subject to the provisions of the DCO including the requirements in Schedule 2, development consent is granted for the "*authorised development*". The *"authorised development"* which comprises a generating station with a gross electrical output capacity of over 50 megawatts, and associated development is defined in Schedule 1 of the **Draft Development Consent Order [EN010154/APP/3.1]**.

4.1.3 If consented, the DCO would permit the authorised development defined in Schedule 1 of the **Draft Development Consent Order [EN010154/APP/3.1]** within the limits shown on the **Works Plans [EN010154/APP/2.2]**. This includes all works required for the construction, operation (including maintenance and repair), and decommissioning of the Proposed Development which comprises ground-mounted solar PV panels, switchgear, inverters and transformers and associated development including battery storage, onsite cabling, an Onsite Substation and landscaping and biodiversity enhancement.

4.1.4 The principal work defined in Works No. 1 is ground mounted solar PV with PV modules fitted to mounting structures and electrical cables.

4.1.5 Works No.2 through to Works No.9 comprise associated development and include the following:

a. a centralised BESS compound to store energy generated by the solar panels and import power from the grid directly to allow the BESS system to help support the grid through grid balancing mechanisms (Work No.2),

b. distributed BESS where approximately 328 batteries are distributed throughout the Principal Site (Work No.3),

c. the Onsite Substation (Work No.4),

d. high voltage cables and connection works to the proposed National Grid substation near Navenby (Work No.5),

e. works to lay cables to connect Work No. 1 and Work Nos. 2, 3 and 4 (Work No. 6),

f. temporary construction and decommissioning compound and laydown areas (Work No.7),

g. works to facilitate access (Work No.8), and

h. works to create, enhance and maintain green infrastructure and environmental mitigation (Work No.9).

4.1.6 The limits of the proposed works are shown on the **Works Plans [EN010154/APP/2.2]**.

4.1.7 **Figure 3-2A: Indicative Fix South Facing Layout of** the ES **[EN010154/APP/6.2]** and **Figure 3-2B: Indicative Single Axis Tracker Layout** of the ES **[EN010154/APP/6.2]** show the indicative layout of the Proposed Development.

4.1.8 As set out in the **Draft Development Consent Order [EN010154/APP/3.1]** the operational life of the Proposed Development will be 60 years from the point of commissioning of the entirety of the Proposed Development.

Other Authorised Works

4.1.9 The following schedules of the **Draft Development Consent Order [EN010154/APP/3.1]** and related plans define, and secure, works related to streets:

a. Schedules 4, 5 and 6 of the **Draft Development Consent Order [EN010154/APP/3.1]** and the **Streets, Rights of Way and Access Plans [EN010154/APP/2.3]** set out any new or altered means of access and any diversions of PRoW; and

b. Schedule 8 of the **Draft Development Consent Order [EN010154/APP/3.1]** and the **Traffic Regulation Measures Plans [EN010154/APP/2.4]** show details of temporary traffic signals that may be required for the Proposed Development.

4.1.10 The plans set out in paragraph 4.1.9 above are certified documents as set out in Schedule 13 of the **Draft Development Consent Order [EN010154/APP/3.1]**.

Associated Development

4.1.11 The associated development is described in Schedule 1 of the **Draft Development Consent Order [EN010154/APP/3.1]** and is set out in paragraph 4.1.5 above. Guidance on associated development for major infrastructure projects has been issued by the Department for Communities and Government (DCLG). Paragraph 6 of the DCLG guidance states in that associated development will *"be typical of development brought forward alongside the relevant type of principal development or of a kind that is usually necessary to support a particular type of project"*. Paragraph 5 of the same guidance sets out considerations when determining whether development should be treated as associated development. According to the guidance, associated development should in summary:

a. Have a direct relationship with the principal development. It should support construction or operation of the principal development, or help address its impacts;

b. Be subordinate to the principal development;

c. Not be treated as associated development if it is only necessary as a source of additional revenue for the applicant in order to cross subsidise the cost of principal development. This does not mean that the applicant cannot cross subsidise, but if part of a proposal is only necessary as a means of cross-subsidising the principal development then that part should not be treated as associated development; and

d. Be proportionate to the nature and scale of the principal development.

4.1.12 The works defined as Works No.2 through to Works No.9 are necessary to deliver the NSIP (Work No. 1) as they will support the construction, operation and decommissioning of the Proposed Development and help address its impacts. Works No.2 through to Works No.9 are also subordinate to the principal development and the works would not be delivered in isolation. Works No.2 through to Works No.9 are not solely needed as sources of additional revenue for cross funding purposes and they are proportionate to the nature and scale of the Proposed Development and minimise its environmental impacts.

4.1.13 Specifically, Works Nos. 2 and 3 include centralised and distributed BESS which is an important component of the transition to net zero and providing flexibility to the energy system, as recognised in paragraphs 3.3.25 to 3.3.27 of NPS EN-1. The BESS is classed as associated development because:

a. It has a direct relationship with the Proposed Development and will support its operation by storing energy when it is generated in abundance and releasing it to the grid when it is needed, increasing the reliability of the energy system and contributing to the security of supply more generally. This increases the efficiency of the Proposed Development as a renewable energy project aiding both its operation as a generation station and the export of electricity to the grid.

b. It is subordinate to the Proposed Development and is dependent on the operation of the solar generation and would not be delivered in isolation.

c. The main purpose of the BESS is to increase the operational efficiency of the solar PV panels by ensuring that energy generated can be stored when demand is low and respond to demand immediately by discharging to the grid to balance supply and demand requirements. It is acknowledged that the BESS may provide an additional source of revenue, however this is not the purpose of the BESS as part of the Proposed Development.

d. The BESS is proportionate to the nature and scale of the Proposed Development as it optimises its efficiency and maximises renewable energy generation providing more consistent export of energy to the grid.

4.1.14 In summary, all the works covered by Work Nos. 2 through to 9 as described above are considered associated development in accordance with the DCLG guidance and within the provisions of s115(2) of the PA 2008.

Flexibility

4.1.15 Paragraph 4.3.11 of NPS EN-1 states that *"In some instances, it may not be possible at the time of the application for development consent for all aspects of the proposal to have been settled in precise detail. Where this is the case, the applicant should explain in its application which elements of the proposal have yet to be finalised, and the reasons why this is the case."* Paragraph 4.3.12 continues that *"Where some details are still to be finalised, the ES should, to the best of the applicant's knowledge, assess the likely worst-case environmental, social and economic effects of the proposed development to ensure that the impacts of the project as it may be constructed have been properly assessed."*

4.1.16 Paragraph 2.10.70 of NPS EN-3 recognises that it is likely that flexibility will be needed in relation to proposed solar development which may include:

a. *"The type, number and dimensions of the panels;*
b. *Layout and spacing;*
c. *The type of inverter or transformer; and*
d. *Whether storage will be installed (with the option to install further panels as a substitute)*".

4.1.17 Paragraph 2.10.71 of NPS EN-3 adds *"Applicants should set out a range of options based on different panel numbers, types and layout, with and without storage."*

4.1.18 As described in **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]**, the technology for solar PV and BESS continues to evolve rapidly; for example, solar PV panels are becoming increasingly powerful year on year and better at minimising shading losses, which affects how developers space the rows of solar PV and the amount of land needed to achieve the proposed export capacity. As a result, the design parameters of the Proposed Development need to maintain some degree of flexibility to allow the most appropriate technology to be utilised at the time of construction.

4.1.19 To account for flexibility and enable the optimal design of the Proposed Development post consent, the Rochdale Envelope approach has been adopted for environmental assessment. The Rochdale Envelope provides a framework for assessing the maximum (and where relevant, minimum) parameters, including the limits of deviation (e.g. development extents or specific maximum heights) as relevant, for the Proposed Development where flexibility needs to be retained. This approach also ensures that the worst-case scenario is assessed. The result is that the impacts of the Proposed Development will only be equal to or less than those concluded in the assessments of the **ES [EN010154/APP/6.1]**. Accordingly, the **Draft**

Development Consent Order [EN010154/APP/3.1] secures the worst-case parameters via the **Works Plans [EN010154/APP/2.2]**, **Streets, Rights of Way and Access Plans [EN010154/APP/2.3]** and the **Proposed Development Parameters [EN010154/APP/7.4]**. This provides certainty that the impacts of the Proposed Development will be no worse than those assessed as part of the EIA.

4.1.20 **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]** explains the approach taken to the Rochdale Envelope in the production of the ES.

Time Limited Consent

4.1.21 Paragraph 2.10.65 of NPS EN-3 states that *"Applicants should consider the design life of solar panel efficiency over time when determining the period for which consent is required. An upper limit of 40 years is typical, although applicants may seek consent without a time-period or for differing time-periods of operation."* Paragraph 2.10.66 of NPS EN-3 goes on to state that *"Time limited consent, where granted, is described as temporary because there is a finite period for which it exists, after which the project would cease to have consent and therefore must seek to extend the period of consent or be decommissioned and removed".*

4.1.22 The Applicant is seeking a time limited consent for the Proposed Development to be in operation for 60 years, with decommissioning to take place following cessation of operation. A 60-year time limited consent will maximise the renewable energy generation of the Proposed Development and allow for replacement of panels halfway through if there is a loss in output capacity. A 60-year time period also allows flexibility for technological advancements in PV arrays after a few decades, should it be available. The operational life of the Proposed Development is anticipated to be 2033 to 2093.

Design Approach

4.1.23 As set out in Section 1.5 of this Planning Statement, the Applicant has sought to achieve good design outcomes from an early stage. The Proposed Development has evolved within a clear design framework, based on a clear Design Vision and Design Principles. The Design Vision the Proposed Development is ***"****to seek to maximise the renewable energy generation across the site for the agreed export capacity with National Grid Energy Transmission, whilst aligning with national planning policy and aiming to minimise environmental effects, supporting the delivery of the Government's objectives and commitments for the development of a secure, reliable, and affordable supply of energy while also meeting decarbonisation targets".*

4.1.24 The Design Principles take into account site context and national and local planning policy and seek to provide a balance between the need to maximise renewable energy generation whilst minimising potential adverse impacts and providing mitigation and enhancement measures. The Design Principles along with feedback received at Non-Statutory and Statutory Consultation, technical

engagement with stakeholders and ongoing environmental assessment provide a framework for evolution of the design. The design of the Proposed Development is a result of this iterative process which is explained in the **Design Approach Document [EN010154/APP/7.3]**.

4.1.25 The Design Principles are as follows:

a. Design Principle 1: The Proposed Development will be sensitively integrated into its landscape setting, to minimise adverse landscape and visual effects as far as possible;

b. Design Principle 2: The Proposed Development will be sensitive to the existing agricultural land quality in Lincolnshire, reducing the amount of development (and in particular permanent land take) on Best and Most Versatile quality land where possible;

c. Design Principle 3: The Proposed Development will respond sensitively to its proximity to residential dwellings, village settlements and the caravan park with regard to visual impact, noise and lighting;

d. Design Principle 4: The Proposed Development will recognise the potential impact on protected species and habitat features. It will safeguard these through the use of buffers, offsets and construction measures to minimise impacts;

e. Design Principle 5: The Proposed Development will be sensitive to heritage assets, providing suitable offsets, and including protecting views to Lincolnshire Cathedral;

f. Design Principle 6: The Proposed Development will be designed to be resilient to flood risk now and in the future, with close engagement with the Environment Agency;

g. Design Principle 7: The Proposed Development will provide safe accesses and minimise residual cumulative impacts on the road network as far as practicable, whilst delivering the construction at a rapid pace to bring the project online as soon as practical. The main route of the A46 will be preferred for construction traffic. Additional emergency accesses to the Site will also be provided where practicable;

h. Design Principle 8: The Proposed Development will be designed to align with field boundaries and existing landscape features. It will seek to retain any existing vegetation and minimise watercourse crossings where practicable;

i. Design Principle 9: The Proposed Development will seek to avoid adverse impacts and to enhance existing biodiversity through the creation of new green infrastructure and the creation of new habitat for wildlife to achieve a minimum 10% in Biodiversity Net Gain;

j. Design Principle 10: The Proposed Development will enhance, where possible, the existing connectivity within the network of PRoW through the provision of permissive paths and circular routes to be available for public

use during the operation of the authorised development to improve accessibility; and

k. Design Principle 11: The Proposed Development will ensure that battery safety is managed through appropriate siting away from sensitive receptors and ensuring the inclusion of embedded design mitigation measures to minimise risks.

4.1.26 Design Commitments support the Design Principles at detailed design stage and are secured under Requirement 6, set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. The Design Commitments are set out in **Appendix A: Design Commitments** of the **Design Approach Document [EN010154/APP/7.3]**.

4.1.27 The design evolution of the Proposed Development is also summarised in **Chapter 4: Alternatives and Design Evolution** of the ES **[EN010154/APP/6.1]**. The landscape and ecological design for the Proposed Development is explained in the **Framework LEMP [EN010154/APP/7.15]**.

4.2 Construction Activities

Overview

4.2.1 The construction phase is anticipated to take 24 months if multiple construction teams are mobilised simultaneously, or up to 30 months if it is built out sequentially. Subject to development consent being granted, construction is anticipated to start in 2031 to enable completion for the proposed connection date of 2033. As discussed in **Chapter 5: Environmental Impact Assessment Methodology** of the ES **[EN010154/APP/6.1]**, the assumed 2031 construction start date for the purposes of assessment within the ES is based upon information currently available, including the construction of the proposed National Grid substation near Navenby, which allows for the connection of the Proposed Development to the national electricity transmission network. If construction of the proposed National Grid substation near Navenby is progressed quicker than anticipated, the Proposed Development construction may commence sooner to facilitate an earlier connection.

4.2.2 A **Framework CEMP [EN010154/APP/7.7]** has been prepared to accompany the DCO application. The **Framework CEMP [EN010154/APP/7.7]** provides a framework for environmental management during the construction phase of the Proposed Development, with the aim of providing a clear and consistent approach to environmental mitigation during construction. Production of a detailed CEMP is secured under Requirement 12 set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.

4.2.3 A **Framework CTMP [EN010154/APP/7.18]** has also been prepared which sets out the measures to manage construction traffic and staff vehicles within the vicinity of the Proposed Development along the local highway network during the peak construction period of the works, in order to limit any potential disruptions and implications on the wider transport network. Production of a

detailed CTMP is secured under Requirement 14 set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.

4.2.4 Construction activities are set out in detail in **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]**. In summary, there are 4 stages for construction of the Proposed Development including site preparation, construction of the Principal Site and cable connection, testing and commissioning and lastly reinstatement, landscaping, planting and habitat creation.

Construction Staff

4.2.5 At the peak of construction, which is currently expected to be during 2032, it is estimated that a maximum of 600 workers will be required per day. On average the construction is anticipated to require 350 workers per day, with 25 allocated to the works on the Cable Corridor. This number will be less at other times of the construction phase and if construction is carried out over a slightly longer period than the anticipated 24 months. Measures to manage construction traffic are set out in the **Framework CTMP [EN010154/APP/7.18]**.

Construction Hours of Work

4.2.6 The core working hours will be 07:00 to 19:00 Monday to Friday, and 07:00 to 13:00 on Saturday, year-round, although there is the possibility of shorter hours in the months with reduced daylight hours. The working hours are typical for most projects, including NSIPs. There will be no works on Sundays and Bank Holidays. Some works activities may need to occur out of these hours/times due to activities requiring to be undertaken continuously (such as horizontal directional drilling (HDD) and cable jointing). Where on-site works are to be conducted outside the core working hours, they will comply with the restrictions stated in the **Framework CEMP [EN010154/APP/7.7]**, and any other restrictions agreed with the relevant planning authorities pursuant to the consent process under s61 of the Control of Pollution Act 1974.

Construction Traffic, Plant and Site Access

4.2.7 It is expected that during the construction phase there will be a peak of around 50 HGV deliveries per day (100 HGV movements per day) attributed to the Principal Site, with an average of 35 HGV deliveries per day (70 HGV movements per day) throughout the duration of the construction phase. For the Cable Corridor, there is anticipated to be eight HGV deliveries per day (16 HGV movements per day), occurring at the same time as the deliveries for the Principal Site.

4.2.8 It is also anticipated that there would be two to three abnormal indivisible loads (AIL) deliveries in total to deliver the transformers for the Onsite Substation, and also the 400 kV cable drums. Further detail on assumed AIL routes and accesses is provided in the **Framework CTMP [EN010154/APP/7.18]** and further detail on daily HGV and LGV movements is provided within **Chapter**

13: Traffic and Transport of the ES **[EN010154/APP/6.1]**. Measures to manage construction traffic during construction are set out in the **Framework CTMP [EN010154/APP/7.18]**.

Construction Compounds and Lighting

4.2.9 There will be one main construction compound, located west of Haddington Lane south of the A46, and several secondary compounds, as shown in **Figure 3-1 Construction Compound and Access Locations** of the ES **[EN010154/APP/6.2]**. The main compound would be up to 100m x 200m and the secondary compounds will be up to 100m x 100m and will contain a site office, mobile welfare units, canteen facility, a fenced area for storage and waste skips and space for short-term parking, storage, download and a turning area. The compounds will be converted to solar PV or landscaping and mitigation/enhancement planting at the end of their use.

4.2.10 In addition to the main compound and the secondary compounds, smaller short-term use construction compounds will be located across the Site including the Cable Corridor. The location of the temporary construction compounds for the Cable Corridor are shown in **Figure 3-1 Construction Compound and Access Locations** of the ES **[EN010154/APP/6.2]**.

4.2.11 No long-term onsite storage of materials is required during the construction phase. Materials will be delivered via HGVs at regular intervals to the construction compounds and transported directly to where they are required within the DCO Site using smaller LGVs.

4.2.12 Short term storage of materials and plant will be accommodated within the construction compounds until required.

4.2.13 During winter months, mobile lighting towers with a power output of 8kVA may be used during construction in isolated work areas, in line with the working hours proposed above. There will also be lighting at the main construction compounds while construction is underway.

Site Reinstatement and Habitat Creation

4.2.14 Prior to and during the construction phase, and following construction, a programme of site reinstatement and habitat creation will be implemented.

4.2.15 The Proposed Development has been designed to integrate with and, where practicable, enhance the local green infrastructure network, improving ecological connectivity across the Principal Site. The proposed planting design shown in **Figure 3-2A: Indicative Fix South Facing Layout** of the ES **[EN010154/APP/6.2]** and **Figure 3-2B: Indicative Single Axis Tracker Layout** of the ES **[EN010154/APP/6.2]** has responded to the varied character by allowing views to remain open, where screening would not be appropriate. Based on the indicative layout of the Principal Site, new planting would include, in addition to hedgerow enhancement, gapping up and infill planting, and grassland under the panels and along perimeter buffers:

a. Approximately 16km of new native hedgerows;

b. Approximately 20ha of species rich grassland outside of PV areas;

c. Approximately 212 new trees; and

d. Approximately 1.8ha of orchard[1].

4.2.16 Measures to mitigate the loss of arable farmland and providing habitat for ground nesting birds, in particular Skylark and Lapwing have been embedded into the Proposed Development. As set out in **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]**, a minimum of 64ha of permanent grassland will be delivered to support ground nesting breeding birds, along with a minimum 181ha of managed arable land. These measures are set out in the **Framework LEMP [EN010154/APP/7.15]**.

4.2.17 The Applicant is committed to delivering a minimum biodiversity net gain. The **Biodiversity Net Gain (BNG) Report [EN010154/APP/7.12]**, demonstrates that on the basis of the illustrative design, the Proposed Development could achieve a net gain of 30% for area-based habitat units, 50% for hedgerow units, and 10% for watercourse units using DEFRA's Statutory Biodiversity Metric (Version 1.0.4) (Ref. 42).

4.2.18 A **Framework LEMP [EN010154/APP/7.15]** sets out the principles for how the land will be managed throughout the operational phase, following the completion of construction and how mitigation, enhancement, establishment and management of landscape and biodiversity will be delivered. Production of a detailed LEMP is secured under Requirement 8 set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.

4.3 Operational Activities

Overview

4.3.1 During the operational phase, activity on the Principal Site will be limited and would be restricted principally to vegetation management, equipment maintenance and servicing, periodic replacement of components, periodic fence inspection, and monitoring to ensure the continued effective operation of the Proposed Development.

4.3.2 During operation, some of the construction access points will continue to be used in addition to the dedicated operational accesses. Furthermore, there will be three separate accesses for emergency services. Access proposals are shown in **Figure 3-1: Construction Compound and Access Locations** of the ES **[EN010154/APP/6.2]**, **Figure 3-2A: Indicative Fix South Facing Layout** of the ES **[EN010154/APP/6.2]**, **Figure 3-2B: Indicative Single Axis Tracker Layout** of the ES **[EN010154/APP/6.2]**, and the **Streets, Rights of Way and Access Plans [EN010154/APP/2.3]**.

[1] The purpose of the community orchard is for use by local residents and the community to enable open access to the area, enjoyment of the space and to allow residents and the community to pick fruit from the trees grown within this orchard.

4.3.3 Fire suppression water at the BESS will be provided from water storage tanks on site. The **Framework Battery Safety Management Plan (BSMP) [EN010154/APP/7.17]** further describes the management of firefighting water.

4.3.4 During the operational phase, there will be up to four permanent staff per day predominantly undertaking day-to-day maintenance tasks, in addition to around two visitors per week. Up to a total of 20 staff per day (in addition to the four permanent staff undertaking day-to-day maintenance) will attend the Principal Site when required for maintenance, the replacement of solar infrastructure and cleaning.

4.3.5 A **Framework OEMP [EN010154/APP/7.8]** has been produced setting out how mitigation and management measures during operation will be implemented and monitored. In addition, the **Framework LEMP [EN010154/APP/7.15]** sets out the landscape and ecology monitoring measures to be implemented during operation. Operational safety risks related to the centralised and distributed BESS are set out in the **Framework BSMP [EN010154/APP/7.17]**. Preparation of the detailed BSMP, LEMP and OEMP is secured under Requirements 7, 8 and 13 set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.

4.4 Decommissioning Activities

4.4.1 Following the operational phase, anticipated to be 2033 – 2093, the Proposed Development will be decommissioned. **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]** sets out the activities which will occur during decommissioning, which includes the removal and recycling or disposal of all solar PV panels, the Onsite Substation, mounting structures, inverters, transformers and BESS. Buried cables would either be removed or left in situ. Decommissioning, similar to construction, is expected to take between 24 and 30 months and would be undertaken in phases. The first phase would remove the above ground structures followed by the removal of below ground elements of the Proposed Development.

4.4.2 The decommissioning process will enable the majority of the Principal Site to be returned to the landowner, available for its original use with any planting retained as far as practicable. Areas of landscape and biodiversity mitigation and enhancement, as well as permissive paths delivered as part of the Proposed Development, would remain up until the land is returned to the previous landowners. Following this, the landowners would choose how the land is to be used and managed.

4.4.3 The details and management of the decommissioning process are set out within the **Framework DEMP [EN010154/APP/7.9]**. A detailed DEMP is secured under Requirement 20 set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.

4.5 The Proposed National Grid Substation near Navenby

4.5.1 The Proposed Development will connect to the national electricity transmission network at the proposed National Grid substation near Navenby. The proposed National Grid substation near Navenby is subject to a separate planning application by National Grid (not submitted at the time of writing of this Statement) and does not form part of the Proposed Development.

4.5.2 The Order Limits include the area of land where the proposed National Grid substation near Navenby would be constructed. At the location of the proposed National Grid substation near Navenby, the Proposed Development includes minor modifications to the future substation bay to allow for connection of the 400kV Grid Connection Cable, which will come above ground within the site of the proposed National Grid substation near Navenby.

4.5.3 Whilst the proposed National Grid substation near Navenby does not form part of this application and is subject to a separate decision-making process under the Town and County Planning Act 1990, there is no indication that this development will not come forward, with the website for the project stating planning submission will be in "*Late 2025*"[2] (at the time of writing).

4.5.4 The principle of the proposed National Grid substation near Navenby is supported in policy and subject to mitigation measures being appropriately applied, is expected to receive planning consent subject to satisfying all material planning considerations in accordance with policy requirements.

4.6 Community Benefit

4.6.1 Should the Proposed Development be consented, the Applicant will provide a sum of £400/MWac per annum during its operational life, in line with guidance. Whilst this does not form part of the DCO application and does not comprise a benefit in the context of the planning balance, it does comprise a benefit of the Proposed Development to the wider community.

[2] https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects/navenby-substation [accessed July 2025]

5. Need and Benefits for the Proposed Development

5.1 Introduction

5.1.1 This section provides a summary of the need for the Proposed Development and should be read alongside the **Statement of Need [EN010154/APP/7.1]** which sets out the full need case.

5.2 The Need for the Proposed Development

5.2.1 Part 2 of NPS EN-1 sets out government policy on energy and energy infrastructure development to meet net zero by 2050 by decarbonising the power sector, ensuring security of supply and contributing to sustainable development. Paragraph 2.1.3 of NPS EN-1 is clear that "*To produce the 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."*

5.2.2 The need, and presumption in favour of granting consent, is set out in Part 3 of NPS EN-1. Paragraph 3.2.1 of NPS EN-1 states that *"The government's objectives for the energy system are to ensure our supply of energy always remains secure, reliable, affordable, and consistent with net zero emissions in 2050 for a wide range of future scenarios"* and that "*We need a range of different types of energy infrastructure to deliver these objectives"* (paragraph 3.2.2), including the infrastructure described in NPS EN-1.

5.2.3 Paragraph 3.2.6 of NPS EN-1 states that *"The Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is a need for those types of infrastructure which is urgent, as described for each of them in this Part."* Paragraph 3.2.7 goes on to state that *"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.*" Paragraph 3.2.8 of NPS EN-1 notes that "*the Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established by this NPS."* These key paragraphs in NPS EN-1 demonstrate the urgent need for nationally significant renewable energy projects such as the Proposed Development.

5.2.4 Section 3.3 of NPS EN-1 sets out the need for new nationally significant electricity infrastructure. Paragraph 3.3.1 of NPS EN-1 provides context, stating that "*Electricity meets a significant* proportion *of our overall energy needs and our reliance on it will increase as we transition our energy system to deliver our net zero target. We need to ensure that there is sufficient electricity to always meet demand; with a margin to accommodate*

unexpectedly high demand and to mitigate risks such as unexpected plant closures and extreme weather events". Paragraph 3.3.3 of NPS EN-1 also recognises that *"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"* and 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*."

5.2.5 Paragraph 3.3.4 of NPS EN-1 goes on to state that additional generating plants, electricity storage, interconnectors and electricity networks all have a role in meeting the government's energy objectives, but none of them would be able to do so in isolation.

5.2.6 Paragraphs 3.3.20 to 3.3.25 of NPS EN-1 set out the role of wind and solar which are the *"lowest cost ways of generating electricity"* and that "*analysis shows that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar"* (paragraph 3.3.20).

5.2.7 Paragraphs 3.3.25 to 3.3.31 of NPS EN-1 set out the role of electricity storage recognising that "*Storage has a key role to play in achieving net zero and providing flexibility to the energy system*" (paragraph 3.3.25) and "*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"* (paragraph 3.3.26).

5.2.8 Paragraph 4.2.1 of NPS EN-1 highlights that the government has committed to fully decarbonising the power system by 2035 and that more than half of final energy demand in 2050 could be met by electricity, as transport and heating in particular shift from fossil fuel to electrical technology. Paragraph 4.2.2 states that *"The UK's strategy to increase supply of low carbon energy is dependent on deployment of renewable and nuclear power generation, alongside hydrogen and CCUS. Our energy security and net zero ambitions will only be delivered if we can enable the development of new low carbon sources of energy at speed and scale".* Accordingly, Paragraph 4.2.4 sets out that the "*Government has therefore concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure*."

5.2.9 The definition of CNP infrastructure is provided at Paragraph 4.2.5 of NPS EN-1 and includes all onshore and offshore electricity generation that does not involve fossil fuel combustion, such as the Proposed Development. Paragraph 4.2.6 of NPS EN-1 is clear that *"The overarching need case for each type of energy infrastructure and the substantial weight which should be given to this need in assessing applications, as set out in paragraphs 3.2.6 to 3.2.8 of EN-1, is the starting point for all assessments of energy infrastructure applications."* Whilst the urgent need case for the Proposed Development is established, paragraph 4.2.10 of NPS EN-1 makes clear that "*Applicants for*

CNP infrastructure must continue to show how their application meets the requirements in this NPS and the relevant *technology specific NPS, applying the mitigation hierarchy, as well as any other legal and regulatory requirements.*"

5.2.10 NPS EN-3 sets out specific policy for solar development. Paragraph 2.10.9 of NPS EN-3 states that "*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 by 2050. As such, solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector.*"

5.2.11 Paragraph 2.10.10 of NPS EN-3 goes on to confirm that solar has an important role in delivering the government's goals for greater energy independence including those of the British Energy Security Strategy which sets out that the government expects a five-fold increase in combined ground and rooftop solar deployment by 2035 (up to 70GW).

5.2.12 In addition, paragraph 2.10.11 of NPS EN-3 states that the provision of solar will meet the aims of the Powering Up Britain: Energy Security Plan which confirms that that government seeks large scale ground-mounted solar deployment across the UK, looking for development mainly on brownfield, industrial and low and medium grade agricultural land. It sets out that solar and farming can be complementary, supporting each other financially, environmentally and through shared use of land, and encourages deployment of solar technology that delivers environmental benefits, with consideration for ongoing food production or environmental improvement.

5.2.13 Paragraph 2.10.14 of NPS EN-3 confirms that "*Solar farms can be built quickly and, coupled with consistent reductions in the cost of materials and improvements in the efficiency of panels, large-scale solar is now viable in some cases to deploy subsidy-free*."

5.2.14 The **Statement of Need [EN010154/APP/7.1]** describes how the Proposed Development is consistent with the relevant aspects of UK Government policy as it relates to the provision of energy infrastructure. In particular, the Proposed Development complies with the requirements of National Policy Statements EN-1 and EN-3, which were designated in January 2024, and were revised in draft form in April 2025. The Proposed Development is required to support the delivery of the UK's legally binding emissions reduction targets, while maintaining national security of supply, improving the overall affordability of the energy system, and providing value for money to end-use consumers.

5.2.15 The **Statement of Need [EN010154/APP/7.1]** makes reference to the UK Government's recently published Clean Power 2030: Action Plan (December 2024) which represents the policy ambitions of the current government. The Clean Power 2030: Action Plan puts the scale of the challenge into context illustrating the gap between the 16.6GW of installed solar capacity in 2024 and the 45-47GW of solar capacity anticipated for 2030. However, the **Statement of Need [EN010154/APP/7.1]** also recognises solar to be highly beneficial due to having a "*short construction window and scalability due to modularity.*

This enables near-term capacity additions which are essential to closing the UK's emissions gap in the 2030s."

5.2.16 The **Statement of Need [EN010154/APP/7.1]** demonstrates that solar is technically and economically viable in the UK; and the preferred low-carbon energy source for consumers. The role of BESS within the Proposed Development is highlighted as beneficial and comprises an essential part of a zero-carbon electricity and energy system.

5.2.17 The **Statement of Need [EN010154/APP/7.1]** concludes by stating that the meaningful and timely contributions offered by the Proposed Development 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 beyond delivery of the government's 'Clean Power by 2030' mission.

Delivering Net Zero

5.2.18 Under the Climate Change Act 2008, the UK Government has committed to achieving net zero greenhouse gas emissions by 2050. As recognised in the **Statement of Need [EN010154/APP/7.1]** solar power is a key enabler of the shift towards clean electricity generation and is *"a proven, scalable technology capable of rapid deployment with minimal environmental impact and low operational emissions".* The **Statement of Need [EN010154/APP/7.1]** also highlights that as the UK decarbonises its economy, demand for electricity is projected to double by 2040. Consequently, the **Statement of Need [EN010154/APP/7.1]** sets out that projects such as the Proposed Development will be crucial to meeting this benchmark.

Supporting Security of Supply

5.2.19 The **Statement of Need [EN010154/APP/7.1]** identifies two key areas through which solar energy provides security of supply. These are through reducing fossil fuel dependency and the role of storage and flexibility. Recent geopolitical events have underscored the need to enhance domestic energy resilience. The **Statement of Need [EN010154/APP/7.1]** explains that solar generation strengthens energy security by producing electricity close to demand, using a domestic, renewable resource that is not subject to global fuel markets.

5.2.20 The **Statement of Need [EN010154/APP/7.1]** recognises that solar generation provides complementary output to other renewable sources, particularly wind and that where solar is deployed as part of a geographically dispersed portfolio its output becomes more predictable and contributes to the adequacy of the national electricity supply.

5.2.21 The **Statement of Need [EN010154/APP/7.1]** explains that inclusion of energy storage within the Proposed Development enhances its contribution to system security. Battery storage enables time-shifting of solar output, absorbing energy when generation exceeds demand and discharging it during system peaks. This reduces curtailment, increases utilisation of solar capacity, and can provide ancillary services to the power grid.

Contributing to Affordability

5.2.22 The **Statement of Need [EN010154/APP/7.1]** sets out the contribution of solar energy in improving the affordability of energy as one of the most cost-effective methods to generate electricity and that analysis by the government consistently shows that utility-scale solar has a lower levelised cost of energy than fossil gas generation, new nuclear, or emerging technologies such as hydrogen-fired turbines.

5.2.23 The **Statement of Need [EN010154/APP/7.1]** sets out that solar displaces higher-cost marginal generators during daylight hours, it exerts a downward influence on wholesale electricity prices. This 'merit order' effect reduces the clearing price in energy markets, delivering consumer savings and reducing the cost of decarbonisation. Furthermore, storing when power is abundant and dispatching when needed also exerts downward pressure on power prices.

5.2.24 The **Statement of Need [EN010154/APP/7.1]** also recognises that new solar developments such as the Proposed Development are not only needed to decarbonise electricity supply but also ensure generation capacity keeps pace with the expected growth in demand, as surface transport, heating and industrial process energy end uses will be required to be electrified.

Summary

5.2.25 In summary, NPS EN-1 and NPS EN-3 confirm the urgent need and presumption in favour of granting development consent for low carbon energy generation projects such as the Proposed Development. Electricity generation is identified as being of CNP and storage (such as BESS) is identified as having a key role to play in achieving net zero and therefore urgently needed to help meet the UK Government's energy objectives.

5.2.26 If consented, the Proposed Development would contribute to achieving the UK's energy vision, as set out in both national policy and guidance. The status of the Proposed Development as a large-scale solar development with BESS will allow it to contribute to delivering net zero, support security of supply and contribute to affordability.

5.3 Benefits

5.3.1 The Proposed Development provides a number of important benefits which are explained further below.

Electricity Generation

5.3.2 The Proposed Development will have a grid connection capacity of over 50MW and will connect to the proposed National Grid substation near Navenby. Over the 60-year lifetime of the Proposed Development, the Proposed Development will provide urgently needed low carbon renewable electricity and contribute to the transition to net zero.

5.3.3 When in operation, the Proposed Development will contribute to the security of supply by providing low carbon renewable energy to the national grid. The

Proposed Development will also contribute to reliability by storing surplus electricity in times of low demand and provide electricity when demand is higher by the use of BESS.

Decarbonisation

5.3.4 The **Statement of Need [EN010154/APP/7.1]** sets out that without a substantial increase in additional low-carbon electricity generating capacity, the urgent requirement for decarbonisation of transport, heating, and industry infrastructure is unlikely to be achieved, threatening the UK's ability to achieve its legally binding target of net zero by 2050. Increasing solar generation is critical to the provision of adequate low-carbon electricity to meet increasing demands.

5.3.5 **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** provides detailed information on emissions which includes operational carbon intensity, whole life carbon emissions, and Greenhouse Gas Emissions (GHGs). Operational carbon intensity is the amount of carbon generated per kWh of electricity produced. **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** calculates the lifetime operational carbon intensity of the Proposed Development to be 25gCO2e/kWh which is due to emissions from replacement components rather than the operation of the Proposed Development. When compared to the 2024 grid operational carbon intensity value of 207 gCO2e/kWh taken from the UK Government's "*Greenhouse gas reporting: conversion factors 2024*" (Ref. 41), this makes the operational intensity of the Proposed Development 88% lower than the grid average.

5.3.6 As described in **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]**, the payback period for the whole lifecycle carbon of the Proposed Development is twelve years of operation, with further carbon savings delivered for each subsequent year of operation. This indicates the contribution that the Proposed Development will have towards the UK meeting its legally binding carbon budgets over the estimated 60-year operational phase.

5.3.7 Overall, the beneficial effects of the Proposed Development with regard to decarbonisation exceed net zero requirements, with an overall positive climate impact. This means overall the net GHG impacts are below zero and there is an overall reduction in atmospheric GHG concentration when compared to a 'without project' baseline.

5.3.8 The savings achieved in relation to GHG emissions throughout the lifetime of the Proposed Development highlight the value of solar energy in the UK's transition to, and maintenance of, a low carbon economy. These such changes are required to be implemented with urgency in order for the UK to comply with its carbon reduction targets and to meet its energy demand as independently as possible.

Ecological Enhancements

5.3.9 The design of the Proposed Development includes habitat creation and enhancement. The mitigation hierarchy has been applied to avoid impacts and minimise those which are unavoidable. Additionally, where practicable, habitats have been enhanced through measures as stated in the **Framework LEMP [EN010154/APP/7.15]** and **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]**.

5.3.10 Overall, **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** concludes that the Proposed Development has the potential to generate beneficial effects for a range of important ecological features occurring in both aquatic and terrestrial habitats. This includes the cessation of farming practices including agricultural chemical inputs to watercourses and pesticide use on crops as well as the extensive creation of grassland habitats and positive management existing boundary features.

5.3.11 **Chapter 8 Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** also sets out the additional mitigation and enhancement measures including the following:

a. Woodland planting which provides ecological value through forming important wildlife corridors between existing woodlands;

b. The natural regeneration of hedgerows to encourage a broad mosaic of successional habitats forming broad habitat corridors throughout the Proposed Development;

c. Scrub to provide shelter and food resources for birds and other wildlife, enhancing biodiversity;

d. Natural regeneration areas to further increase biodiversity and provide an opportunity to observe the gradual structural transition from grassland canopy to woodland habitats;

e. Species-rich grassland and arable field margins to increase biodiversity, enhancing value for wildlife such as providing food resource;

f. Pond restoration and planting around ponds to maximise wildlife value;

g. A range of artificial bird and bat boxes will be installed to increase the availability of nesting and roosting features, enhancing the value of habitats for species; and

h. Creation of habitat piles to provide refuge and hibernation opportunities for amphibians and reptiles as well as dead wood habitat for invertebrates, which ultimately benefit fauna like bats and birds.

5.3.12 The **Framework LEMP [EN010154/APP/7.15]** sets out the measures for delivering landscape and ecological enhancements. A detailed LEMP is secured under Requirement 8 set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.

5.3.13 The Proposed Development will also result in benefits to soil resources. **Chapter 12: Socio-Economics and Land Use** of the ES

[EN010154/APP/6.1] sets out that while the development is operational the soil resource within the Principal Site would remain under a perennial grass cover, before being returned to its original use following decommissioning. This would provide multiple benefits to the soil, enhancing the functional capacity of the soil resources for future arable production. Furthermore, bare soil structures would not be vulnerable to wind and water erosion, there would be improved infiltration of rainwater reducing erosive surface water runoff, greater exploitation of subsoil by plant roots which improves drainage and loosens compacted soils, and the recovery of topsoil organic matter which would improve aggregate stability, water holding capacity and plant nutrient availability.

5.3.14 The Proposed Development is committed to delivering a net gain in biodiversity in accordance with Requirement 8 set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]** and as set out in the **BNG Report [EN010154/APP/7.12]**. The Proposed Development is predicted to result in a net gain of 30% for area-based habitat units, 50% for hedgerow units, and 10% for watercourse units. The report demonstrates the Proposed Development has the potential to deliver a significant biodiversity net gain on site, which is significantly higher than the Government's target for 10% biodiversity net gain as set out in the Environment Act 2021 (Ref. 36).

Permissive Paths

5.3.15 The Proposed Development will also create new permissive paths across the Principal Site. Approximately 9.5km of new permissive paths are proposed to supplement the existing PRoW network, link existing routes and create new and enhance existing connections to surrounding villages. The proposed permissive paths are as follows:

a. Route from Tunman Wood linking to PRoW LL/TOTH/11/1 to the east of Morton.

b. Route from Tunman Wood to Fosse Lane including a link to the Cathedral View Caravan Park linking with PRoW LL/TOTH/6A/1.

c. Cathedral View Caravan Park to Fosse Lane, providing a circular walk and safer route and access to Thorpe-on-the-Hill for residents.

d. East of Witham St Hughs, providing a circular walk around the proposed community orchard and linking to PRoW LL/AUbo/11/2.

e. Route south of Thurlby linking to PRoW LL/ThuN/2/1.

f. West of Bassingham providing a circular walk and linking to PRoW LL/NoDi/1/2.

5.3.16 **Figure 3-3: Proposed Permissive Paths** of the ES **[EN010154/APP/6.2]** and Sheets 1-5, 7 and 9 of the **Streets, Right of Way and Access Plans [EN010154/APP/2.3]** show the location of the proposed permissive paths.

Employment Generation

5.3.17 **Chapter 12: Socio-Economics and Land Use** of the ES **[EN010154/APP/6.1]** provides information on the potential employment opportunities arising from the Proposed Development. A peak of 600 full-time equivalent (FTE) jobs and an average of 350 gross direct FTE jobs onsite over the 24-month construction period are anticipated. It is expected than 45% of construction staff will be sourced from the local area. Additionally, there will be an increase in local employment opportunities because of the construction activities generated by the Proposed Development.

5.3.18 During the operational phase there is estimated to be a gross number of four permanent jobs generated, with two visiting workers per week and additional staff for occasional maintenance tasks totalling up to 20 staff per day. Further jobs will be created on a temporary basis during the decommissioning phase of the Proposed Development, on average 394 total net jobs per annum will be expected to be taken by residents within the 60-minute travel time, with 217 jobs taken by workers living outside this area.

5.3.19 To maximise the economic benefits to the local community a **Framework Employment, Skills, and Supply Chain Plan [EN010154/APP/7.16]** identifies potential opportunities for activities relating to skills, supply chain and employment which the Applicant could take forward post-consent. This includes apprenticeships and workforce training. Providing apprenticeships within the energy sector will be key in delivering the required renewable energy infrastructure. A detailed ESSCP is secured under Requirement 19 set out in Schedule 2 of the **Draft Development Consent Order [EN0101/54/APP/3.1]**.

Economic Benefits

5.3.20 As set out in **Chapter 12: Socio-Economics and Land Use** of the ES **[EN010154/APP/6.1]** the total Gross Value Added (GVA) from construction is calculated, as the sum of the average gross direct value added per construction worker in the area and the total number of construction workers generated from the Proposed Development, to be a contribution of £27.4 million to the national economy. This value would be split between the study area, which includes the 60-minute travel area (As shown on **Figure 12-1: 60 Minute Drive Time from the Site Boundary** of the **ES [EN010154/APP/6.2]**, and outside the study area, which in practice would be £12.3 million and £15.1 million respectively.

Summary

5.3.21 As set out above, the Proposed Development provides substantial benefits in terms of low carbon energy generation, contribution to decarbonisation, ecological enhancements, the provision of permissive paths, employment generation and economic growth. Taken as a whole, these benefits comprise substantial positive weight in the planning balance.

6. Planning Appraisal

6.1 Introduction

6.1.1 This section considers the compliance of the Proposed Development with the energy NPSs. When making a decision on the Proposed Development, the Secretary of State must have regard to the energy NPSs in accordance with s104(2)(a) of the PA 2008.

6.1.2 Reference has been also made to the NPPF and local planning policies where they could be considered important and relevant to the Secretary of State's decision making.

6.1.3 **Appendix B: NPS Accordance Tables** and **Appendix C: Local Policy Accordance Tables** of this Planning Statement set out a detailed analysis of compliance with the specific policies of the energy NPSs and adopted local planning policies.

6.2 Assessment Principles

Introduction

6.2.1 Part 4 of NPS EN-1, sets out the general policies for the submission and assessment of applications relating to energy infrastructure. As described previously, the need for energy infrastructure is established in NPS EN-1, and paragraph 4.1.3 of NPS EN-1 provides that 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*".

6.2.2 Paragraph 4.1.5 of NPS EN-1 sets out that in considering any proposed development, in particular when weighing its adverse impacts against its benefits, the Secretary of State should take into account potential benefits and potential adverse impacts.

6.2.3 The substantial benefits of the Proposed Development are set out in Section 5.3 of this Planning Statement, comprising low carbon energy generation, contribution to decarbonisation, ecological enhancements, the provision of permissive paths, employment generation and economic growth. The impacts (both adverse and beneficial) of the Proposed Development are set out in the ES and highlighted as relevant in this Planning Statement. In weighing benefits and adverse impacts for CNP infrastructure, paragraph 4.1.7 of NPS EN-1 states that "*Where this NPS or the relevant technology specific NPSs require an applicant to mitigate a particular impact as far as possible, but the Secretary of State considers that there would still be residual adverse effects after the implementation of such mitigation measures, the Secretary of State should weigh those residual effects against the benefits of the proposed development. For projects which qualify as CNP Infrastructure, it is likely that*

the need case will outweigh the residual effects in all but the most exceptional cases."

6.2.4 Paragraph 4.1.8 of NPS EN-1 refers to land rights and states that "*Where the use of land at a specific location is required to facilitate the development by providing for mitigation and landscape enhancement, an applicant may, as part of its application to the Secretary of State, seek the compulsory acquisition of that land, or rights over that land."* The rights being sought to construct, operate and decommission the Proposed Development are set out in the **Statement of Reasons [EN010154/APP/4.1]** and the **Book of Reference [EN010154/APP/4.3]**.

6.2.5 Paragraph 4.1.11 of NPS EN-1 confirms that the Energy NPS take account of the NPPF and PPG. **Appendix B: National Policy Accordance Tables** and **Appendix C: Local Policy Accordance Tables** of this Planning Statement provide an assessment of compliance against local and national planning policies.

6.2.6 Paragraph 4.1.19 of NPS EN-1 confirms that early engagement between the Applicant and key stakeholders is strongly encouraged, meaning that only applications which are fully prepared and comprehensive can be accepted for examination. The Applicant has undertaken consultation in the form of a Non-Statutory and Statutory Consultation which is reported in the **Consultation Report [EN010154/APP/5.1]** and the **Consultation Report Appendices [EN010154/APP/5.2]**.

6.2.7 Paragraph 4.1.21 of NPS EN-1 states that the Applicant will make a judgement on the financial and technical viability of the Proposed Development. The **Funding Statement [EN010154/APP/4.2]** which accompanies this application considers the financial and technical viability of the Proposed Development and will demonstrate the Applicant's ability to fund any compulsory acquisition of land or rights (if agreement cannot be reached voluntarily).

The critical national priority for low carbon infrastructure

6.2.8 As set out in Section 5.2 of this Planning Statement, the Proposed Development comprises CNP infrastructure (being onshore generation that does not involve fossil fuel combustion) and therefore it is afforded substantial weight. Paragraph 4.2.7 of NPS EN-1 advises that the CNP policy applies "*following the normal consideration of the need case, the impacts of the project, and the application of the mitigation hierarchy*" and is therefore relevant to the Secretary of State in decision making and should be given consideration by the Examining Authority (ExA) when making its recommendation to the Secretary of State.

6.2.9 Paragraph 4.2.10 confirms that applications for CNP infrastructure must continue to show how the application meets the requirements of NPS EN-1 and NPS EN-3, apply the mitigation hierarchy and satisfy and other legal or regulatory requirements. Paragraph 4.2.11 of NPS EN-1 clarifies that applicants must show how the mitigation hierarchy has been applied and

paragraph 4.2.12 of NPS EN-1 states that applicants should set out how residual impacts will be compensated. **Chapter 5: Environmental Impact Assessment Methodology** of the ES **[EN010154/APP/6.1]** sets out the mitigation hierarchy approach adopted in the wider **ES [EN010154/APP/6.1/6.2/6.3]** and demonstrates how this has been applied.

6.2.10 Paragraph 4.2.15 of NPS EN-1 confirms that "*Where residual non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. Therefore, in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts."* Section 6 of this Planning Statement, the **Design Approach Document [EN010154/APP/7.3]** and relevant chapters of the **ES [EN010154/APP/6.1]** demonstrate how potential impacts have been avoided, minimised and mitigated in order to address impacts.

6.2.11 In summary, s4.2 of NPS EN-1 is crucial in the consideration of the Proposed Development at the decision-making stage. The Proposed Development has CNP status and is urgently needed to help meet the Government's energy objectives. Section 7.4 of this Planning Statement considers the application of the CNP presumption.

Habitats and Species Regulations

6.2.12 Paragraph 4.2.18 of NPS EN-1 confirms that any Habitat Regulation Assessment (HRA) residual impacts will be considered under the framework set out in the Habitats Regulations (under the Conservation of Habitats and Species Regulations 2017). The **Habitats Regulations Assessment Report [EN010154/APP/7.13]** concludes that the Proposed Development is not directly connected with or necessary for the conservation management of a European site; and does not risk having a significant effect on a European site on its own or in combination with other proposals.

6.2.13 On this basis, it can be concluded that there will be no significant effects to any European site or sites either from the construction, operation and maintenance and decommissioning of the Proposed Development or in combination with other plans and projects. Natural England agreed with this assessment during Statutory Consultation. Further detail on their response is set out within the **Consultation Report [EN010154/APP/5.1]**.

Environmental Effects/Considerations

6.2.14 Paragraph 4.3.1 of NPS EN-1 confirms that proposals that are subject to the EIA Regulations must be accompanied by an ES describing the aspects of the environment likely to be significantly affected by the project. Paragraph 4.3.4 states that "*to consider the potential effects, including benefits, of a proposal for a project, the applicant must set out information on the likely significant environmental, social and economic effects of the development, and show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy".*

6.2.15 Paragraph 4.3.12 of NPS EN-1 provides that where details are still to be finalised, the ES should assess likely worst-case environmental, social and economic effects of the proposed development, known as the application of the 'Rochdale Envelope'. Section 4.1 of this Planning Statement explains the approach taken in terms of the Rochdale Envelope.

6.2.16 The **ES [EN010154/APP/6.1/6.2/6.3]** sets out the likely significant effects arising from the Proposed Development. The scope and methodology of the EIA is set out in **Chapter 5: Environmental Impact Assessment Methodology** of the ES **[EN010154/APP/6.1]**. The Scoping Opinion, published by the Planning Inspectorate on 25 July 2023 (**Appendix 1-B: EIA Scoping Opinion** ES **[EN010154/APP/6.3]**) forms the basis of the assessments undertaken. The **ES [EN010154/APP/6.1/6.2/6.3]** has been prepared in accordance with paragraphs 4.3.1 and 4.3.5 of NPS EN-1.

6.2.17 Paragraph 4.3.15 of NPS EN-1 states that applicants are obliged to include in their ES information about the reasonable alternatives that have been studied, indicating the main reasons for the applicant's choice and taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility. The need to consider alternatives arises from Regulation 14 (2)(d) of the EIA Regulations that state that "*an environmental statement is a statement which includes at least a description of the reasonable alternatives studies by the applicant which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment".*

6.2.18 **Chapter 4: Alternatives and Design Evolution** of the ES **[EN010154/APP/6.1]** describes the consideration of alternatives and the design evolution of the Proposed Development. The report concludes there were no alternative technologies or sites studied by the Applicant that could deliver the Design Vision. A full explanation of site selection is set out in **Appendix A: Site Selection Report** of this Planning Statement **[EN010154/APP/7.2]**. The report concludes that the location of the Proposed Development comprises a suitable site taking into account planning and environmental constraints and operational considerations. The **Design Approach Document [EN010154/APP/7.3]** explains the design evolution of the Proposed Development.

6.2.19 Within the remainder of NPS EN-1, there are also specific topic references to the consideration of alternatives:

a. Paragraph 4.3.9 of NPS EN-1 which relates to compulsory acquisition- The Applicant is seeking compulsory acquisition powers over land if it cannot be secured through voluntary agreement. Further details are contained within the **Statement of Reasons [E010154/APP/4.1]**;

b. Paragraph 5.2.7 which relates to the consideration of alternatives when a site is located near to a sensitive receptor site for air quality. As set out in Section 14.2 of **Chapter 14: Other Environmental Topics** of the ES

[EN010154/APP/6.1] the Proposed Development is not located near to a sensitive receptor site for air quality;

c. Paragraph 5.4.42 of NPS EN-1 which relates to avoiding significant harm to biodiversity and geological conservation interests, including through consideration of reasonable alternatives. As set out in **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** it concludes that there will be no potential for significant effects on ecology, and as set out in the **BNG Report [EN010154/APP/7.12]**, there will be a net gain of 30% for area-based habitat units, 50% for hedgerow units, and 10% for watercourse units;

d. Paragraph 5.8.23 of NPS EN-1 which relates to Flood Risk where a scheme would be located within, or partially within, Flood Zone 2 or Flood Zone 3. **Appendix 9-C: Flood Risk Assessment** of the ES **[EN010154/APP/6.3]** sets out a comprehensive assessment of flood risk for the Proposed Development and concludes that the area of the Proposed Development remains safe for its lifetime and does not increase flood risk elsewhere. The Sequential Test is passed for the Principal Site due to flood risk from any source to be low following the embedded mitigation. The sequential test is considered further in Section 6.3; and

e. Paragraph 5.10.32 of NPS EN-1 relates to development within National Parks, the Broads and AONBs (now referred to as National Landscapes). Given the Proposed Development is not located within a National Park, the Broads or National Landscape, this is not considered further.

6.2.20 As demonstrated, the **ES [EN010154/APP/6.1/6.2/6.3]** describes the aspects of the environment likely to be significantly affected by the project. It is also demonstrated that reasonable alternatives have been studied, and these are reported in **Chapter 4: Alternatives and Design Evolution** of the ES **[EN010154/APP/6.1]**.

Health

6.2.21 Paragraph 4.4.1 of NPS EN-1 sets out that energy infrastructure *"has the potential to impact on the health and well-being of the population"* and that *"the construction of energy infrastructure and the production, distribution and use of energy may have negative impacts on some people's health"*. Paragraph 4.4.2 of NPS EN-1 states that this can arise from increased traffic, air or water pollution, dust, odour, hazardous waste and substances, noise, exposure to radiation, and increases in pests.

6.2.22 Paragraph 4.4.3 of NPS EN-1 goes onto state that "*New energy infrastructure may also affect the composition and size 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*." Paragraph 4.4.5 of NPS EN-1 sets out that "*The impacts of more than one development may affect people simultaneously, so the applicants should consider the cumulative impacts on health in the ES where appropriate".*

6.2.23 With regards to decision making, paragraph 4.4.7 of NPS EN-1 states that 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 reason to refuse consent or require specific mitigation under the Planning Act 2008".* Paragraph 4.4.8 of NPS EN-1 goes onto state that not all potential sources of health impacts will be mitigated in this way and *"the Secretary of State may want to take account of health concerns when setting requirements relating to a range of impacts such as noise"*.

6.2.24 As described in the EIA Scoping Report (**Appendix 1-A: EIA Scoping Report** of the ES **[EN010154/APP/6.3]**) and accepted in the Scoping Opinion (**Appendix 1-B: EIA Scoping Opinion** of the ES **[EN010154/APP/6.3]**), potential effects to human health are considered in the ES technical chapters with a standalone assessment scoped out of the EIA. For clarity, potential effects to human health are set out in the following technical assessments of the **ES [EN010154/APP/6.1]**:

a. **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1];**
b. **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]**;
c. **Chapter 11: Noise and Vibration** of the ES **[EN010154/APP/6.1]**;
d. **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]**; and
e. **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]**, Section 14.2: Air Quality.

6.2.25 **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]** identifies the potential impacts and effects of the construction, operation, and decommissioning phases the Proposed Development on surface water features (rivers, streams, ditches, canals, ponds, and lakes) including water quality and hydromorphology, flood risk and drainage. With respect to health, effects on water quality are of most relevance. **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]** concludes that no significant adverse effects have been identified. This is discussed in further detail in section 6.3: Water Quality and Resources of this Planning Statement.

6.2.26 **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** presents the findings of an assessment of the likely significant effects of the Proposed Development upon the landscape character and visual amenity. **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** concludes there are significant effects during construction, operation, and decommissioning for both landscape and visual receptors. Whilst this chapter does not specifically assess the effects on human health, significant landscape and visual effects are predicted for residents of surrounding villages and recreational users of PRoWs, particularly during construction. Although the majority of significant effects are short term and temporary, **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** concludes that one residential receptor and recreational users of some PRoW will still be

affected during operation by changes to views resulting from the short distance to the Proposed Development, the large exposure to the view or substantial alternation of the current view. Whilst there is no evidence that these effects impact upon human health, the measures proposed in the **Framework LEMP [EN010154/APP/7.15]**, with a detailed LEMP secured under Requirement 8 set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**, will help to minimise effects.

6.2.27 **Chapter 11: Noise and Vibration** of the ES **[EN010154/APP/6.1]** considers the noise and vibration impact of the Proposed Development. The chapter concludes that vibration levels during construction are predicted to result in significant adverse effect at three receptors (R26, R35 and R50) if driven piling is undertaken at a distance of 60m or closer. However, these activities would be temporary, for a very short duration and Best Practice Measures (BPM) would be applied to reduce vibration levels as far as practicable. The mitigation measures are set out in the **Framework CEMP [EN010154/APP/7.7]** with a detailed CEMP to be secured under Requirement 12 set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. It is also noted that the duration of any construction noise and vibration effects and construction traffic noise effects are considered to be temporary, short term, and leaving no permanent residual effect once the works are complete. This would also be the case for decommissioning. Therefore, impacts to health, as a result of noise and vibration, are considered to be temporary. This is discussed in further detail in section 6.3: Noise and Vibration of this Planning Statement.

6.2.28 **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]** presents the findings of an assessment of the likely significant effects of the Proposed Development upon the traffic and transport during construction, operation and decommissioning of the Proposed Development. The assessment considered health and safety impacts of traffic effects, for example road user and pedestrian safety; road safety; health status as part of vulnerable user groups; and people at home and at work. Section 13.6 **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]** details the embedded mitigation measures which include activities such as implementing Temporary Traffic Management. These measures will be managed through the implementation of a **Framework PRoW-MP [EN010154/APP/7.14]**, **Framework CEMP [EN010154/APP/7.7]**, **Framework CTMP [EN010154/APP/7.18]**, and **Framework DEMP [EN010154/APP/7.9]** secured in detail by requirements, as detailed in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. With the embedded mitigation measures, the chapter concludes there are no significant Traffic and Transport effects as a result of the Proposed Development.

6.2.29 Section 14.2: Air Quality within **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]**, presents the findings of an assessment of the likely significant effects on air quality as a result of the Proposed Development. The chapter concludes that there are no significant adverse effects upon air quality predicted during construction, operation and decommissioning of the Proposed Development.

6.2.30 As demonstrated, health impacts have been considered in relevant assessments of the Proposed Development and suitable mitigation measures have been incorporated where appropriate to minimise significant adverse effects. It is noted that significant adverse effects are predicted for three receptors due to noise and vibration from piling during construction. With the mitigation measures proposed within the **Framework CEMP [EN010154/APP/7.7]** and a detailed CEMP to be provided and secured via Requirement 12 set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**, the significant adverse vibration impacts during construction would be unlikely to occur and if they did would be temporary, short-term and minimised as far as reasonably practicable.

Environmental and Biodiversity Net Gain

6.2.31 The approach to environmental and biodiversity net gain is set out at Section 4.6 of NPS EN-1. Paragraph 4.6.1 of NPS EN-1 states that "*Environmental net gain is an approach to development that aims to leave the natural environment in a measurably better state than beforehand. Projects should therefore not only avoid, mitigate and compensate harms, following the mitigation hierarchy, but also consider whether there are opportunities for enhancements."*

6.2.32 Paragraph 4.6.2 of NPS EN-1 confirms *"Biodiversity net gain is an essential component of environmental net gain. Projects in England should consider and seek to incorporate improvements in natural capital, ecosystem services and the benefits they deliver when planning how to deliver biodiversity net gain."*

6.2.33 Paragraph 4.6.6 of NPS EN-1 sets out energy NSIP proposals *"should seek opportunities to contribute to and enhance the natural environment by providing net gains for biodiversity, and the wider environment where possible".*

6.2.34 Paragraph 4.6.13 of NPS EN-1 confirms that in addition to delivering biodiversity net gain, developments may also deliver wider environmental gains and benefits to communities *"relevant to the local area, and to national policy priorities, such as reductions in GHG emissions, reduced flood risk, improvements to air or water quality, climate adaptation, landscape enhancement, increased access to natural greenspace, or the enhancement, expansion or provision of trees and woodlands".*

6.2.35 The design of the Proposed Development has evolved with consideration to Design Principle 9, set out in the **Design Approach Document [EN010154/APP/7.3]**, which seeks to avoid adverse impacts and to enhance existing biodiversity through the creation of new green infrastructure and the creation of new habitat for wildlife to achieve a minimum 10% in Biodiversity Net Gain. As is typical for ground-mounted solar projects, the Proposed Development can be expected to deliver biodiversity net gain, given the change from intensively managed agricultural land to a grassland habitat underneath and around solar panels, which is sensitively managed to maximise ecological value.

6.2.36 As part of the design process, a range of additional habitat creation and enhancement measures have also been identified. Measures seek to strengthen existing habitat networks and maximise benefits to local wildlife, with a focus on protected species and those targeted for conservation action. These are set out in the **Framework LEMP [EN010154/APP/7.15]**. This will ensure the Proposed Development will deliver the minimum target of 10% biodiversity net gain, which is expected to become a legal requirement for NSIPs from May 2026. The **BNG Report [EN010154/APP/7.12]** provides details on how the Proposed Development will meet this target.

Criteria for good design for Energy Infrastructure

6.2.37 The design approach for the Proposed Development is summarised in Section 4.1 of this document and explained in full in the **Design Approach Document [EN010154/APP/7.3]**.

6.2.38 Section 4.7 of NPS EN-1 sets out the criteria for good design that are applicable for all energy infrastructure. Paragraph 4.7.1 sets out what is considered to be good design in the context of energy infrastructure setting out that *"The visual appearance of a building, structure, or piece of infrastructure, and how it relates to the landscape it sits within, 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."*

6.2.39 Paragraph 4.7.2 of NPS EN-1 goes on to state that *"Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, 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 energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area.*"

6.2.40 NPS EN-1 paragraph 4.7.3 explains how good design, in terms of siting and use of appropriate technologies, can help mitigate adverse impacts of the Proposed Development. Paragraph 4.7.4 of NPS EN-1 states *"applicants should consider how good design can be applied to a project during the early stages of the project lifecycle".*

6.2.41 NPS EN-1 paragraph 4.7.5 outlines that a project board level design champion could be appointed and *"Design principles should be established from the outset of the project to guide the development from conception to operation."*

6.2.42 Paragraph 4.7.6 of NPS EN-1 acknowledges that *"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…"*

6.2.43 Paragraph 4.7.7 of NPS EN-1 sets out *"Applicants must demonstrate in their application documents how the design process was conducted and how the proposed design evolved."*

6.2.44 Paragraph 4.7.6 of NPS EN-1 acknowledges that *"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"*.

6.2.45 Paragraph 4.7.10 of NPS EN-1 states the Secretary of State *"needs to be satisfied that energy infrastructure is sustainable… attractive, durable, and adaptable…"* Paragraph 4.7.11 of NPS EN-1 outlines that the Secretary of State *"should be satisfied the applicant has considered 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, any potential amenity benefits, and visual impacts on the landscape as far as possible".*

6.2.46 Paragraph 2.5.2 of NPS EN-3 states that *"Proposals for renewable energy infrastructure should demonstrate good design, particularly in respect of landscape and visual amenity, opportunities for co-existence/co-location with other marine and terrestrial uses, and in the design of the project to mitigate impacts such as noise and effects on ecology and heritage."*

6.2.47 Paragraphs 2.10.19 to 2.10.48 of NPS EN-3 refers to factors influencing site selection and design for solar. These factors include irradiance and topography; network connection; proximity to dwellings; agricultural land classification and land type; accessibility; public rights of way and security and lighting. Paragraphs 2.10.49 to 2.10.69 of NPS EN-3 set out further technical considerations regarding the design and layout of sites.

6.2.48 Paragraphs 2.10.70 to 2.10.71 of NPS EN-3 discuss the flexibility in the project details. This is also set out in paragraphs 2.2.1 to 2.2.8 of NPS EN-5 which consider factors influencing site selection and design for electricity networks infrastructure: "*There will usually be a degree of flexibility in the location of the development's associated substations, and applicants should consider carefully their location, as well as their design".* The Applicant is seeking flexibility in the design of the Proposed Development, as explained in Section 4.2 of this Planning Statement.

6.2.49 In addition to national planning policy, national design guidance is also relevant. The National Infrastructure Commission (NIC) in their Design Principles for National Infrastructure refers to four key pillars of good design including Climate, People, Place and Value. The NIC recognise that design relates to both visual appearance and technical performance. In addition, the National Design Guide (January 2021) sets out the components of good design. The Planning Inspectorate's NSIP Advice Page on Good Design (The Planning Inspectorate, 2024) emphasises the importance of good design for achieving sustainable, inclusive, and well-designed infrastructure projects. It encourages applicants to follow the advice provided on design considerations, ensuring a holistic approach throughout the project's development.

6.2.50 The National Fire Chiefs Council also provides guidance on the design of BESS (Ref. 33). It is noted that this guidance is currently being updated and was consulted upon in August 2024 (Ref. 40). The existing and draft guidance (July 2024 revision) has been incorporated into the design and safety of the Proposed Development, which is explained in the **Framework BSMP [EN010154/APP/7.17]**.

6.2.51 The site selection process is set out in the **Appendix A: Site Selection Report [EN010154/APP/7.2]** demonstrates how planning and environmental constraints were considered at an early stage.

6.2.52 As demonstrated in the **Design Approach Document [EN010154/APP/7.3]** a Design Vision and Design Principles have provided the framework for design evolution which has resulted in sustainable infrastructure that is sensitive to place, has minimal impacts on heritage assets, efficient use of natural resources, matched by an appearance that demonstrates good aesthetic as far as possible, in accordance with paragraph 4.7.2 of NPS EN-1. Alongside the Vision and Principles, Design Commitments have been developed to be secured under Requirement 6 set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.

6.2.53 The Applicant has made design decisions responding to the outcomes of Non-Statutory and Statutory consultation, technical feedback as well as ongoing surveys, desk-based analysis and environmental assessment. The design evolution of the Proposed Development is summarised in **Chapter 4: Alternatives and Design Evolution** of the ES **[EN010154/APP/6.1].** The **Design Approach Document [EN010154/APP/7.3]** demonstrates how good design measures are secured in the **Draft Development Consent Order [EN010154/APP/3.1]** the **Works Plans [EN010154/APP/2.2],** the **Proposed Development Parameters [EN010154/APP/7.4]**, and the **Framework LEMP [EN010154/APP/7.15]**. Furthermore, the **Design Approach Document [EN010154/APP/7.3]** sets out how further community engagement will be facilitated through a Community Liaison Group. Accordingly, the Proposed Development is in accordance with the good design policies set out in NPS EN-1.

Climate change Adaption and Resilience

6.2.54 Paragraph 4.10.1 of NPS EN-1 recognises that if energy infrastructure is not sufficiently resilient against the possible impacts of climate change, it will not be able to satisfy the energy needs outlined in Part 3 of the NPS EN-1.

6.2.55 Paragraph 4.10.5 of NPS EN-1 states that when preparing measures to support climate change adaptation, applicants "*should take reasonable steps to maximise the use of nature-based solutions alongside other conventional techniques*". Further to this, paragraph 4.10.7 of NPS EN-1 adds that nature-based solutions can also result in biodiversity benefits and net gain.

6.2.56 Paragraph 4.10.8 of NPS EN-1 states *"applicants must consider the direct and indirect impacts of climate change when planning the location, design, build, operation and, where appropriate, decommissioning of new energy*

infrastructure" Paragraphs 4.10.9 to 4.10.12 of NPS EN-1 require consideration of the impacts of climate change and climate change scenarios be assessed.

6.2.57 Paragraph 4.10.11 of NPS EN-1 sets out that *"applicants should demonstrate that proposals have a high level of climate resilience built-in from the outset and should also demonstrate how proposals can be adapted over their predicted lifetimes to remain resilient to a credible maximum climate change scenario."*

6.2.58 In particular for solar development, paragraph 2.4.11 of NPS EN-3 states *"applicants should consider in particular, how plant will be resilient to: increased risk of flooding and the impact of higher temperatures".*

6.2.59 For decision making, paragraph 4.10.13 of NPS EN-1 states that the Secretary of State "*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 and associated research and expert guidance"* covering the estimated lifetime of the new infrastructure, including any decommissioning period.

6.2.60 Paragraph 5.3.4 of NPS EN-1 states that all proposals for energy infrastructure should include *"steps that have been taken to drive down the climate change impacts"*. Referring to section 4.10 of NPS EN-1 paragraphs 2.3.1 to 2.3.3 of NPS EN-5 advise that, with regard to electricity infrastructure, the resilience of a project to climate change should be assessed in the ES.

6.2.61 **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** presents the assessment of the likely significant effects of the Proposed Development on the climate and the climate change effects that are likely to affect the Proposed Development and surrounding environment.

6.2.62 Within **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]**, it sets out a Climate Change Risk (CCR) Assessment which is presented in **Appendix 6-B Climate Change Risk Assessment** of the ES **[EN010154/APP/6.3]**. The CCR Assessment covers resilience against both gradual climate change, and the risks associated with an increased frequency of extreme weather events in accordance with the UK Climate Projections 2018 (UKCP18) projections. The review of potential impacts and vulnerability of the Proposed Development considers the embedded mitigation measures that have been designed into the Proposed Development.

6.2.63 The design of the Proposed Development has incorporated measures to reduce and provide resilience to climate change and mitigate the impact of the Proposed Development on the climate. This aligns with policy stated in section 14 of the NPPF which details the need to consider mitigations and adaptations for climate change and Section 4.10 of NPS EN-1.

6.2.64 The **Framework CEMP [EN010154/APP/7.7]** will incorporate measures to prevent an increase in flood risk during the construction works, including the provision of temporary settlement and drainage measures. Further discussion

on this is provided in the 'Flood Risk and Drainage' section of this Planning Statement.

6.2.65 The **Framework OEMP [EN010154/APP/7.8]** includes a commitment to embed resilience to projected increases in temperature by selecting inverters and BESS with an adequate cooling system installed to control the temperature and continue to operate efficiently in warmer conditions.

6.2.66 Mitigation measures to protect against the adverse effects of climate change on the natural environment within the Site can also be found in **Chapter 12: Socio-Economics and Land Use** of the ES **[EN010154/APP/6.1]** and the **Framework LEMP [EN010154/APP/7.15]**. These measures include:

a. Consideration of future climate conditions when selecting species for use in green infrastructure; and

b. Protecting against increased soil erosion and degradation due to increased precipitation by covering exposed soil with grass, reducing permeability.

6.2.67 **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** sets out that during the construction phase (anticipated to be 2031-2033) risks assessed mainly cover the workforce and damage to physical structures/asset damage. The major climatic variables include temperature, flooding, and storms. There are no significant climate change risks predicted due to the use of embedded climate change mitigation measures.

6.2.68 **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** states that during the operation phase (anticipated to be 2033-2093), three significant adverse climate change effects are identified. These effects relate to increases in summer and annual temperatures and impacts on the workforce. Embedded mitigation includes monitoring weather forecasts, regular maintenance to monitor asset performance and damage from heat exposure, as well as ensuring access to indoor facilities, scheduled breaks, and appropriate Personal Protective Equipment. As a result of the embedded mitigation measures and good practice measures secured through Requirements 6 (detailed design), 8 (LEMP), 12 (CEMP), 13(OEMP) and 17 (DEMP) of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]** and **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]**, the operational effects on the workforce in the summer (and annual temperatures and impacts) can be mitigated as far as possible.

6.2.69 **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** sets out that during the decommissioning phase (anticipated to be 2093-2095) one significant adverse impact to the workforce is identified, again relating to temperature change and associated risks such as sunstroke, dehydration, and fatigue. Similar mitigation measures to the operational phase are proposed.

6.2.70 It is noted that no features of the design of the Proposed Development that are critical to its operation will be seriously affected by climate change.

6.2.71 **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** also sets out an In-combination Climate Change Impact (ICCI) assessment. The ICCI

assessment considers the ways in which projected climate change will influence the significance of the impact of the Proposed Development on receptors in the surrounding environment.

6.2.72 The ICCI Assessment identified no significant ICCIs present during the construction, operation, and decommissioning phases of the Proposed Development. This included assessment of ICCI's across cultural heritage; ecology and nature conservation; water environment; landscape and visual amenity; noise and vibration; Socio-Economics and land use; traffic and transport; and other environmental topics. The conclusion of no residual significant effects regarding ICCI's results from embedded mitigation and good practice measures in design such as developing an Emergency Response Plan. Mitigation measures included are detailed in **Appendix 6-B Climate Change Risk Assessment** of the ES **[EN010154/APP/6.3].**

6.2.73 In the local context, Lincolnshire County Council has committed to becoming carbon neutral by 2050. North Kesteven District Council published a Climate Emergency Action Plan (2024-2025) in April 2024 which sets a net zero 2030 target for the council and district (Ref. 39). Policy S20 'Resilient and Adaptable Design' of the Central Lincolnshire Local Plan seek to ensure that developments incorporate climate change resilience in their design. Policy S14 'Renewable Energy' of the Central Lincolnshire Local Plan states that *"The Central Lincolnshire Joint Strategic Planning Committee is committed to supporting the transition to a net zero carbon future".*

6.2.74 In terms of the impact of climate change, **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** demonstrates how residual effects during operation and decommissioning can be mitigated as far as possible. The in-combination assessment concludes no residual significant effects. This demonstrates that the Proposed Development accords with the relevant policies of NPS EN-1, NPS EN-3, and the NPPF in relation to climate change. As such, the Proposed Development is considered to result in a neutral weighting in the planning balance with regard to climate change.

Network Connection

6.2.75 Paragraph 4.11.1 of NPS EN-1 outlines that *"the connection of a proposed electricity generation plant to the electricity network is an important consideration for applicants wanting to construct or extend a generation plant"*. The **Grid Connection Statement [EN010154/APP/7.5]** confirms that the Applicant has secured a connection to the proposed National Grid substation near Navenby.

6.2.76 Paragraph 4.11.4 of NPS EN-1 states the *"transmission network infrastructure, and related network reinforcement and upgrade works, associated with nationally significant low carbon infrastructure is considered as CNP Infrastructure".* The Proposed Development will connect to the national electricity transmission network at the proposed National Grid substation near Navenby.

6.2.77 The Order Limits include the area of land where the proposed National Grid substation near Navenby would be constructed. This is to allow for minor modifications to the future Substation bay to allow for the connection of the Applicant's 400kV Grid Connection Cable, which will come above ground within the site of the proposed National Grid substation near Navenby.

Pollution Control and Other Environmental Regulatory Regimes

6.2.78 Paragraph 4.12.1 of NPS EN-1 states that "*Issues relating to discharges or emissions from a proposed project, and which lead to other direct or indirect impacts on terrestrial, freshwater, marine, onshore, and offshore environments, or which include noise and vibration may be subject to separate regulation under the pollution control framework or other consenting and licensing regimes, for example local planning consent or marine licences.*"

6.2.79 With regards to decision making, paragraph 4.12.16 of NPS EN-1 sets out that the Secretary of State *"should not refuse consent on the basis of pollution impacts unless there is good reason to believe that any relevant necessary operational pollution control permits or licences or other consents will not subsequently be granted."*

6.2.80 The **Consents and Agreements Position Statement [EN010154/APP/3.3]** provides information on the additional consents and licences that are, or may be, required to construct and operate the Proposed Development. The **Framework CEMP [EN010154/APP/7.7]**, the **Framework OEMP [EN010154/APP/7.8]** and the **Framework DEMP [EN010154/APP/7.9]** provide the framework for management of environmental impacts at construction, operation and decommissioning to be secured in detail via Requirements 12, 13 and 20, as set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.

6.2.81 With reference to paragraph 4.12.16 of NPS EN-1, it is considered that there should be no reason for the Secretary of State to believe that any operational pollution control permits, or licenses or other consents will not subsequently be granted.

Safety

6.2.82 Paragraph 4.13.1 of EN-1 states that the Health and Safety Executive (HSE) is *"the independent regulator for workplace health and safety and is responsible for enforcing a range of health and safety legislation, some of which is relevant to the construction, operation and decommissioning of energy infrastructure."*. Paragraph 4.13.5 of NPS EN-1 states that *"applicants should consult with the HSE on matters relating to safety".* The HSE was consulted during the Statutory Consultation in their response they confirmed that the Proposed Development does not fall into the consultation zones of any Major Accident Hazard Site or Major Accident Hazard Pipeline. The HSE provided advice on hazardous substances in the event that Hazardous Substance Consent would be needed, however there is no requirement for hazardous substances in relation to the Proposed Development.

6.2.83 Paragraph 4.13.3 of NPS EN-1 provides that some energy infrastructure will be subject to the Control of Major Accident Hazards (COMAH) Regulations 2015. However, solar development is not applicable to the COMAH Regulations.

6.2.84 The EIA Regulations require an assessment of the "*potentially significant effects of a development on the environment as a result of its vulnerability to, or introduction of, risks of major accidents and/or disasters*". Section 14.6 of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** presents the assessment of risks of major accidents and disasters occurring during construction and decommissioning. The assessment has considered a number of potential major accidents and disasters (including malicious activity, floods, fire, road accidents, rail accidents, aircraft disasters, utilities failure, mining/extraction industry and plant disease) and identified appropriate mitigation measures.

6.2.85 Minimising the risk of major accidents during construction, operation and decommissioning will be addressed through appropriate measures set out in the **Framework CEMP [EN010154/APP/7.7]**, **Framework OEMP [EN010154/APP/7.8]** and **Framework DEMP [EN010154/APP/7.9]** submitted with the DCO application. Detailed versions of these plans will be provided and secured by Requirements 12 and 13 respectively in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.

6.2.86 During operation, there is a potential fire risk from the batteries that form part of the BESS. The design of the Proposed Development includes integrated mitigation and protection measures which are detailed in the **Framework BSMP [EN010154/APP/7.17]**. The BESS layout has been developed in consultation with the local fire and rescue service and taken account of guidance from the National Fire Chiefs Council (NFCC). A detailed BSMP is secured under Requirement 7 set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.

6.2.87 Taking into account the good industry practice and additional mitigation measures set out in **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]**, the risk of major accidents and disasters is low for the Proposed Development and significant adverse effects on the environment or people, should such an event occur, are therefore not anticipated.

6.2.88 In conclusion, through protective and mitigation design measures the Proposed Development has taken appropriate consideration of the potential for major accidents and disasters and how to reduce the potential of them occurring to ensure public safety. The Proposed Development is therefore considered to accord with NPS EN-1 in relation to safety.

Hazardous Substances

6.2.89 Paragraph 4.14.1 of NPS EN-1 states that "*All establishments wishing to hold stocks of certain hazardous substances above a threshold need 'Hazardous Substances Consent.*" As there is no requirement for hazardous substances

in relation to the Proposed Development, Hazardous Substance Consent is not required, and therefore not considered further.

Common Law Nuisance and Statutory Nuisance

6.2.90 Paragraph 4.15.6 of NPS EN-1 states that *"At the application stage of an energy NSIP, possible sources of nuisance under section 79(1) of the EPA 1990 and how they may be mitigated or limited should be considered by the Secretary of State so that appropriate requirements can be included in any subsequent order granting development consent."*

6.2.91 The Applicant has prepared a **Statutory Nuisance Statement [EN010154/APP/7.6]** as required by Regulation 5(2)(f) of the APFP Regulations which requires that an application for a DCO must be accompanied by *"a statement setting out whether the proposal engages one or more of the matters in section 79(1) of the Environmental Protection Act 1990 (as amended) and if so how the applicant proposes to mitigate or limit them"*

6.2.92 The matters engaged by the Proposed Development are general site condition, air quality emissions, artificial light, and noise and vibration during construction, operation and maintenance, and decommissioning. Given there are mitigation measures detailed within the **Framework CEMP [EN010154/APP/7.7], Framework OEMP [EN010154/APP/7.8],** and **Framework DEMP [EN010154/APP/7.9]**, which will prevent impacts from having the potential to result in statutory nuisance the **Statutory Nuisance Statement [EN010154/APP/7.6]** concludes that it is not expected that the construction, operation (and maintenance), and decommissioning of the Proposed Development would cause a statutory nuisance.

Security Considerations

6.2.93 Paragraph 4.16.1 of NPS EN-1 sets out that *"national security considerations apply across all national infrastructure sectors"*. Paragraph 4.16.2 of NPS EN-1 states that *"DESNZ works closely with government security agencies including the National Protective Security Authority (NPSA) and the National Cyber Security Centre (NCSC) to provide advice to the most critical infrastructure assets on terrorism and other national security threats, as well as on risk mitigation."*

6.2.94 The Applicant has not identified any relevant considerations relating to national security in relation to the Proposed Development.

6.2.95 Paragraph 4.16.4 of NPS EN-1 states that *"where possible, proportionate protective security measures should be designed into new infrastructure projects at an early stage in the project development".* Furthermore, paragraph 2.10.47 of NPS EN-3 sets out that *"Applicants should assess the visual impact of security measures, as well as the impacts on local residents, including for example issues relating to intrusion from CCTV and light pollution in the vicinity of the site"*. Paragraph 2.10.48 adds *"Applicants should consider the*

need to minimise the impact on the landscape and the visual impact of security measures."

6.2.96 Security measures including fencing, CCTV and lighting are described in **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]**. The impact of these works is assessed in **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]**.

6.3 Impacts

6.3.1 This section of the Planning Statement considers the policy compliance of the generic impacts that arise from energy infrastructure covered by the energy NPSs.

Air Quality and Emissions

6.3.2 Paragraph 5.2.1 of NPS EN-1 recognises that energy infrastructure can have adverse effects on air quality and accordingly, paragraph 5.2.8 of NPS EN-1 states the applicant *"should undertake an assessment of the impacts of the proposed project as part of the ES"*. NPS EN-1 Paragraph 5.2.9 sets out what the ES should describe related to air quality, including *"existing air quality concentrations"* and *"any significant air quality effects"*.

6.3.3 Section 14.2 of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** presents the findings of an assessment of the likely significant effects on air quality as a result of the Proposed Development. The assessment includes consideration of road traffic as required by paragraph 5.2.9 of NPS EN-1. Section 14.2 of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** concludes that there are no significant adverse effects upon air quality predicted during construction, operation and decommissioning of the Proposed Development. **Table 14.5** of Section 14.2 of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** summarises the good practice mitigation measures relevant to air quality that are incorporated into the **Framework CEMP [EN010154/APP/7.7], Framework OEMP [EN010154/APP/7.8]** and **Framework DEMP [EN010154/APP/7.9]**. These measures are secured under Requirements 12, 13 and 20 set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**

6.3.4 Paragraph 5.2.16 of NPS EN-1 sets out that the Secretary of State *"should give air quality considerations substantial weight where a project would lead to a deterioration in air quality"*. It also states that *"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 statutory limits, objectives or targets."* Given there are no significant adverse effects on air quality, the Proposed Development will not lead to a deterioration in air quality.

6.3.5 Paragraph 5.7.1 of NPS EN-1 requires mitigation of impacts from a range of emissions, including dust, to be included, as they *"have the potential to have a detrimental* impact *on amenity or cause a common law nuisance or statutory nuisance".* Paragraph 5.7.5 of NPS EN-1 states the applicant should assess

"*the potential for…dust to have a detrimental impact on amenity… as part of the ES"* and paragraph 5.7.6 of NPS EN-1 sets out the criteria to assess. Accordingly, a Dust Risk Assessment (DRA) forms part of the air quality assessment as set out in Section 14.2 of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]**. The DRA sought to determine the level of risk that dust poses to air quality during the construction and decommissioning phases of the Proposed Development. The magnitude of dust emissions was considered at each stage of the Proposed Development in conjunction with the sensitivity of the surrounding area. Although the DRA assigns a medium risk for dust effects, with implementation of the good practice measures, set out in the **Framework CEMP [EN010154/APP/7.7], Framework OEMP [EN010154/APP/7.8]** and **Framework DEMP [EN010154/APP/7.9]**, the impact of the construction phase would be negligible.

6.3.6 Central Lincolnshire Local Plan policies S14 (Renewable Energy) and S53 (Design and Amenity) require development to not "*result in adverse impacts upon air quality"*. As there are no adverse residual effects anticipated through implementation of management plans, the Proposed Development is considered to comply with this policy.

Summary

6.3.7 Paragraph 5.2.16 of NPS EN-1 directs the Secretary of State to place substantial weight on air quality considerations and the respective mitigation measures as part of the decision-making process. As set out above, there are no significant effects on air quality, and mitigation measures are set out in the **Framework CEMP [EN010154/APP/7.7]**, **Framework OEMP [EN010154/APP/7.8]** and **Framework DEMP [EN010154/APP/7.9]**. As a result, the Proposed Development is in accordance with NPS EN-1 and policies S14 and S53 of the Central Lincolnshire Local Plan. The effect of the Proposed Development on air quality is considered to have neutral weight in the planning balance.

Greenhouse Gas Emissions

6.3.8 Paragraph 5.3.1 of NPS EN-1 recognises that *"significant levels of energy infrastructure development are vital to ensure the decarbonisation of the UK economy",* although *"the construction, operation and decommissioning of the energy infrastructure will in itself, lead to GHG emissions"*.

6.3.9 As described in section 6.1 above, the Proposed Development has considered climate change adaptation in detail. This section on GHG should also have regard to *"the current policy on climate change, and how this NPS interacts with that policy and Section 4.10 of the NPS, which deals with climate change adaptation"* (paragraph 5.3.2 of NPS EN-1).

6.3.10 Paragraph 161 of the NPPF states the planning system should support the transition to net zero by 2050 and support renewable and low carbon energy and associated infrastructure. Paragraph 168 of the NPPF states that "*local planning authorities should not require applicants to demonstrate the overall*

need for renewable or low carbon energy and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future."

6.3.11 Paragraph 5.3.4 of NPS EN-1 states *"All proposals for energy infrastructure projects should include a GHG assessment as part of their ES"*, to ensure that appropriate mitigation and adaptation measures are incorporated. A GHG Assessment is set out in **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]**.

6.3.12 Paragraphs 5.3.8 and 5.3.9 of NPS EN-1 provide that the Secretary of State should *"Be satisfied that the applicant has as far as possible assessed the GHG emissions of all stages of the development" and "that the applicant has taken all reasonable steps to reduce the GHG emissions of the construction and decommissioning stage of the development."*

6.3.13 Paragraph 5.3.10 of NPS EN-1 states *"The Secretary of State should give appropriate weight to projects that embed nature-based or technological processes to mitigate or offset the emissions of construction and decommissioning within the proposed development. However, in light of the vital role energy infrastructure plays in the process of economy wide decarbonisation, the Secretary of State must accept that there are likely to be some residual emissions from construction and decommissioning of energy infrastructure."*

6.3.14 Paragraph 5.3.11 of NPS EN-1 acknowledges that operational GHG emissions are not reasons to prohibit the consenting of energy projects or to impose more restrictions on them in the planning policy framework than are set out in the energy NPSs. Paragraph 5.3.12 of NPS EN-1 outlines the *"Secretary of State does not therefore need to assess individual applications for planning consent against operational carbon emissions and their contribution to carbon budgets, net zero and our international climate commitments."*

6.3.15 The GHG Assessment set out in **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** covers the construction, operation and decommissioning GHG impacts, demonstrating compliance with NPS EN-1, which specifies the need to consider all stages of development under paragraphs 5.3.8 and 5.3.9. The assessment concludes that of the embodied carbon emissions for the construction phase (anticipated to be 2031-2033) are 253,630 tCO2e and the total GHG emissions for the construction phase are 280,682, with total emissions from construction equating to 0.016% as a proportion of the UK's 5th carbon Budget (2028 to 2032).

6.3.16 During operation and maintenance (anticipated to be 2033-2093), the operational energy emissions will decrease annually falling from 179 tCO2e in the first year to 22 tCO2e annually by 2050. The operational emissions over the design life of the Proposed Development are estimated at 477,466 tCO2e, with almost 99% of these emissions associated with the materials and transport of the replacement components required throughout operation. Overall, the emissions equate to 0.004% of the UK's 6th Carbon Budget (2033-

2037). Using expected figures for the UK Carbon Budgets to 2050, during the operational phase total emissions from the Proposed Development will not exceed 0.1% of the respective UK Carbon Budget. The use of BESS provides additional carbon saving opportunities, providing an additional saving of 2,242,089 tCO2e over the operational lifetime of the Proposed Development.

6.3.17 In the decommissioning phase (anticipated to be 2093 – 2095), it is difficult to predict the future conditions with certainty, however a conservative total emission of 2,869 tCO2e is anticipated for decommissioning.

6.3.18 The effects of GHG emissions arising from construction and decommissioning are anticipated to result in minor adverse, but with mitigation measures, non-significant effects. As noted in paragraph 5.3.10 of NPS EN-1, the Secretary of State must accept that there are likely to be some residual emissions from construction and decommissioning of energy infrastructure.

6.3.19 In accordance with paragraphs 5.3.8 to 5.3.9 of NPS EN-1, the Applicant has sought to minimise GHG emissions where possible. Measures for reducing construction GHG impacts are suggested in the **Framework CEMP [EN010154/APP/7.7]** and **Framework DEMP [EN010154/APP/7.9]** to be secured in detail via requirements 12 and 20 set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. This includes measures such as:

a. Designing, constructing and implementing the Proposed Development in such a way as to minimise the creation of waste and maximise the use of alternative materials with lower embodied carbon, such as locally sourced products and materials with a higher recycled content where feasible;

b. Liaising with construction personnel for the potential to implement staff minibuses and car sharing options;

c. Implementing a Travel Plan within the CTMP to reduce the volume of construction staff and employee trips to the Proposed Development, while encouraging the use of lower carbon modes of transport by identifying and communicating local bus connections and pedestrian/cycle access routes to/from the Proposed Development to all construction staff, and providing appropriate facilities for the safe storage of cycles; and

d. Switching vehicles and plant off when not in use and ensuring construction vehicles conform to current EU emissions standards.

6.3.20 The operational phase of the Proposed Development is considered to have one significant effect which is beneficial. This is due to the net GHG impacts being below zero and resulting in a reduction in the atmospheric GHG concentration when compared to a without-project baseline, where net zero is substantially exceeded. As set out in the **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]**, the carbon payback period for the whole life carbon emissions (including replacements) is approximately 12 years of operation, with the payback period for construction emissions being approximately 4 years of operation.

6.3.21 The GHG savings achieved throughout the lifetime of the Proposed Development demonstrate the integral role solar energy generation will play in the transition to a low carbon economy.

Summary

6.3.22 NPS EN-1 directs the Secretary of State to give appropriate weight to embedded measures which offset the emissions of construction and decommissioning, but to accept residual emissions from these phases *"in light of the vital role of energy infrastructure in decarbonisation"* (paragraph 5.3.10 of NPS EN-1). Additionally, the assessment of GHGs and a corresponding strategy for their reduction is required.

6.3.23 The minor adverse effects of GHG emissions, identified in the GHG assessment, during operation and decommissioning are reduced through embedded mitigation measures to be non-significant, with a residual significant beneficial effect identified for the operational phase, as identified in **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** with the carbon payback period for the whole life carbon emissions (including replacements) is approximately 12 years of operation, with the payback period for construction emissions being approximately 4 years of operation. This will help the UK meet its national and international binding targets including the UK's Carbon Budget and the Nationally Determined Contributions in line with the Paris Agreement. As a result, the Proposed Development demonstrates compliance with NPS EN-1 in relation to GHG emissions and is afforded substantial positive weight in the planning balance.

Biodiversity and Geological Conservation

6.3.24 NPS EN-1 recognises the government's policy aims for biodiversity at paragraph 5.4.2 of NPS EN-1 which is to "*halt overall biodiversity loss in England by 2030 and then reverse loss by 2042, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people".*

6.3.25 Paragraph 5.4.17 of NPS EN-1 states that 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, including irreplaceable habitats."*

Habitats Regulations

6.3.26 Paragraph 5.4.4 of NPS EN-1 sets out that 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.

6.3.27 The **Habitats Regulation Assessment Report [EN010154/APP/7.13]** concludes that there will be no significant effects to any European site or sites either from the construction, operation and maintenance and

decommissioning of the Proposed Development or in combination with other plans and projects.

Sites of Special Scientific Interest

6.3.28 Paragraph 5.4.7 of NPS EN-1 is clear that development on land within or outside a Site of Special Scientific Interest (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 Proposed Development is not located within or an outside an SSSI.

Regional and Local Sites

6.3.29 Sites of regional and local biodiversity and geological interest are outlined in NPS EN-1 paragraph 5.4.12, which identifies the important contribution to ecological networks and nature recovery these provide, including wider benefits associated with public access and climate mitigation. This includes local wildlife sites (LWS) with paragraph 5.4.13 confirming that local development plan policies should *"secure their protection from harm or loss but also help to enhance them and their connection to the wider ecological networks.*" The Proposed Development is not located within a Local Wildlife Sites.

Ancient woodland, ancient trees, veteran trees and other irreplaceable habitats

6.3.30 Paragraphs 5.4.14 to 5.4.15 of NPS EN-1 set out that the government is committed to *"maintain and enhance the existing resource of known ancient and veteran trees*" and that "*ancient and veteran trees found outside ancient woodland are particularly valuable*". NPS EN-1 paragraph 5.4.32 states that applicants should *"Include measures to mitigate fully the direct and indirect effects of development on ancient woodland, ancient and veteran trees or other irreplaceable habitats during both construction and operational phases."*

6.3.31 NPS EN-1 paragraph 5.4.53 explains that the Secretary of State should not grant development consent if the development would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons, and a suitable compensation strategy exists.

6.3.32 NPS EN-3 Paragraph 2.5.2 adds that proposals for renewable energy infrastructure should demonstrate 'good design' by mitigating impacts and effects on ecology. Paragraph 2.10.78 further explains that applicants should use an advising ecologist during the design process to ensure that adverse impacts are avoided, minimised or mitigated in line with the mitigation hierarchy, and to also ensure that biodiversity enhancements are maximised.

6.3.33 There is no ancient woodland within the Order Limits although Tunman Wood, to the east of Morton is located adjacent to the boundary. **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** sets out that veteran and ancient trees were recorded within the Order Limits and will be

retained and protected with suitable buffers as presented in the **Works Plans [EN010154/APP/2.2]**.

Protection and enhancement of habitats and species

6.3.34 Paragraph 5.4.33 of NPS EN-1 states that *"Applicants should consider any reasonable opportunities to maximise the restoration, creation, and enhancement of wider biodiversity, and the protection and restoration of the ability of habitats to store or sequester carbon".*

6.3.35 Opportunities to conserve and enhance biodiversity are demonstrated throughout **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** which describes how biodiversity has been integral to the design and layout of the Proposed Development. The iterative design process in relation to biodiversity, focussed on the Design Principle outlined in the **Design Approach Document [EN010154/APP/7.3]** of *recognising the potential impact on protected species and habitat features*. It will safeguard these through the use of buffers and offsets and has allowed the Proposed Development to protect species and avoid direct or indirect impacts to habitats. The Order Limits have been refined to exclude sensitive areas of ancient woodland, such as Stocking Wood, which is outside of the Order Limits. Tunman/Housham Woods (part of Tunman Wood Local Wildlife Site and also including Stocking Wood), are immediately adjacent to the Principal Site however no adverse effects are anticipated.

6.3.36 The design of the Proposed Development also seeks to protect species and habitat features through the use of buffers and offsets and through the provision of undeveloped areas of at least 15m between woodlands, and appropriate buffers between ancient/veteran or ancient trees (based on tree root protection areas), thereby avoiding any direct impact. Buffers and offsets are included in the Design Commitments at **Appendix A: Design Commitments** of the **Design Approach Document [EN010154/APP/7.3]** and secured by Requirement 6 set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.

6.3.37 The Proposed Development also makes provision bird mitigation comprising 64ha of permanent grassland and 181ha of retained arable for Skylark and Lapwing, as presented in **Figure 8-5: Bird Mitigation Land Allocation** of the ES **[EN010154/APP/6.2]**) and secured in the **Framework LEMP [EN010154/APP/7.15]**. This land will be utilised to provide an important contribution to the ecological networks, with habitat creation and enhancement to offset the impact of loss of arable farmland for breeding ground-nesting birds as well as provide extensive benefits for other important ecological features and wider biodiversity.

6.3.38 In line with **Figure 7.15 Landscape Mitigation Plan** (presented within the **Framework LEMP [EN010154/APP/7.15]**), one of the overarching aims in the **Framework LEMP [EN010154/APP/7.15]** is to deliver habitat creation and management with the aim of providing significant ecological enhancements while strengthening green infrastructure within the area. This will be achieved through improvements to hedgerows, tree and shrub planting and restoration

of ponds which will improve landscape structure and ecological connectivity. Measures proposed in the **Framework LEMP [EN010154/APP/7.15]** such as the management of existing trees, shrubs and woodland, and species choice in the implementation of new habitats (woodland, tree belts, hedgerows and the community orchard) will improve resilience to climate change.

6.3.39 Paragraph 5.4.35 of NPS EN-1 sets out examples of measures that applicants should demonstrate to appropriately avoid, mitigate and compensate impacts to, and enhance biodiversity. This includes, but is not limited to, confining construction activities to minimum areas required for the works; timing construction to limit disturbance; best practice measures in construction and operation to ensure impacts to species and habitats is minimised; restoration of habitats; enhancing existing habitats and where practicable, creating new habitats of value. These features are noted in the **Framework LEMP [EN010154/APP/7.15]** and the **Framework CEMP [EN010154/APP/7.7]** to be secured by Requirements 8 and 12 set out in Schedule 2 of **the Draft Development Consent Order [EN010154/APP/3.1]**.

6.3.40 Paragraph 5.4.41 of NPS EN-1 states "*Benefits of nationally significant low carbon energy infrastructure may include benefits for biodiversity interests and these benefits may outweigh the harm to these interests.*"

6.3.41 **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** presents the findings of an assessment of the potential significant effects of the construction, operational, and decommissioning phases of the Proposed Development on ecology and nature conservation (collectively referred to as biodiversity). The chapter concludes that the Proposed Development will not result in any significant adverse effects to biodiversity and any measures to protect species are embedded in the **Framework LEMP [EN010154/APP/7.15]** and the **Framework CEMP [EN010154/APP/7.7]** to be secured by Requirements 8 and 12 set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.

6.3.42 It is acknowledged that during construction, there are activities causing direct loss of small sections of hedgerows, however embedded mitigation measures and the design of the Proposed Development, for example using existing field lines where possible as set out in the Design Principles, have sought to minimise any losses. Moreover, the **Framework LEMP [EN010154/APP/7.15]** sets out that approximately 16.16km of additional hedgerows and 7.4km of 'gapping up' of hedgerows will be provided.

Biodiversity Net Gain

6.3.43 Solar farms have the potential to increase the biodiversity value of a site, as explained in paragraph 2.10.89 of NPS EN-3. In some instances, this can result in significant benefits and enhancements beyond Biodiversity Net Gain, which result in wider environmental gains which is encouraged. The benefits of low carbon infrastructure may outweigh other harm to biodiversity, as recognised within paragraph 5.4.41 of NPS EN-1.

6.3.44 Development is required to protect and enhance ecological and biodiversity features, as identified within local planning policy. Policies that relate to ecology and biodiversity include Policy S5 (Development in the Countryside), S14 (Renewable Energy), S53 (Design and Amenity), S59 (Green and Blue Infrastructure Network), S60 (Protecting Biodiversity and Geodiversity), S61 (Biodiversity Opportunity and Delivering Measurable Net Gains), S62 (Area of Outstanding Natural Beauty and Areas of Great Landscape Value), S63 (Green Wedges), S64 (Local Green Space), S65 (Important Open Space) and S66 (Trees, Woodland and Hedgerows) of the Central Lincolnshire Local Plan.

6.3.45 Policy S14 of the Central Lincolnshire Local Plan states that *"Proposals for ground based photovoltaics should be accompanied by evidence demonstrating how opportunities for delivering biodiversity net gain will be maximised in the scheme taking account of soil, natural features, existing habitats, and planting proposals accompanying the scheme to create new habitats linking into the nature recovery strategy".*

6.3.46 Policy S61 states that proposals should provide a minimum of 10% biodiversity net gain. As discussed in section 2.7 of this Planning Statement, delivering BNG as part of a DCO is not mandatory at the date of submission of the application, however as set out in the **BNG Report [EN010154/APP/7.12]** the Applicant has committed to deliver a minimum of 30% biodiversity net gain in habitat units, 50% biodiversity net gain in hedgerow units and 10% biodiversity net gain in watercourse units. This is to be provided through measures including woodland planting, natural regeneration of hedgerows and the provisions of species-rich grassland and arable field margins.

6.3.47 The BNG will be secured under Requirement 8 of the **Draft Development Consent Order [EN010154/APP/3.1]**.

6.3.48 An **Arboricultural Impact Assessment (AIA)** is provided at **Appendix 10-H Arboricultural Impact Assessment** of the **ES [EN010154/APP/6.3].** The AIA considers the likely direct and indirect arboricultural impacts of the Proposed Development on trees within or immediately adjacent to the Order Limits. The AIA concludes that part of one group of high quality (Category A); six individual trees, one tree group, part of three groups and part of two hedgerows of moderate quality (Category B); and seven individual trees, part of four tree groups, one hedgerow and part of 81 hedgerows of low quality (Category C) are likely to be removed to facilitate the Proposed Development. In addition, two individual trees and part of one hedgerow, identified as unsuitable for retention for more than ten years as living trees in the context of the current land use (Category U) are likely to be removed to facilitate the Proposed Development. Tree removals are assessed on a worst-case scenario and are required due to a direct conflict with the footprint of proposed new structures, areas of hard surfacing, security fencing and the associated working space requirements to install these features.

6.3.49 No trees subject to Tree Preservation Order or within a Conservation Area are to be removed.

6.3.50 With regard to the impact of electromagnetic fields (EMFs), section 14.8 of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** also considers the impact of EMFs on fish. It concludes that where the cables associated with the Proposed Development are proposed to cross watercourses, the cables will be installed at the following depths: (a) trenchless crossing of the export cable circuit 5m beneath Main Rivers (i.e. Brant and Witham) and (b) 2m beneath minor/ordinary watercourses, except where minor/ordinary watercourses have minimal or no water flow and water management is easily managed, which will provide sufficient distance to attenuate EMF and avoid impacts on river species such as fish. The effect on river fauna is therefore considered to be negligible.

Summary

6.3.51 As demonstrated, adverse effects on biodiversity are minimised where possible through careful consideration of biodiversity matters in the design process alongside the measures proposed in the **Framework LEMP [EN010154/APP/7.15]**.

6.3.52 The **Habitats Regulation Assessment Report [EN010154/APP/7.13]** concludes there are no likely significant effects as a result of the Proposed Development (alone or in-combination) on internationally designated sites.

6.3.53 With the embedded mitigation measures incorporated into the design of the Proposed Development, as set out in Section 8.10 of **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** the assessment concludes that the construction, operation and decommissioning of the Proposed Development are unlikely to result in any significant adverse effects on all important species habitats and designated sites. The Proposed Development has the potential to generate beneficial effects for a number of the important ecological features, occurring in both aquatic and terrestrial habitats, from the cessation of farming practices including agricultural chemical inputs to watercourses and pesticide use on crops, as well as the extensive creation of grassland habitats and positive management of existing boundary features. In addition, the measures set out in the **Framework LEMP [EN010154/APP/7.15]** result in benefits to landscape character and ecological connectivity and improve resilience to climate change.

6.3.54 Given the Proposed Development delivers ecological enhancements and net gain exceeding national and local policy and is in accordance with NPS EN-1 and NPS EN-3, and local planning policy relating to the protection of ecological sites and features, the Proposed Development can be afforded substantial positive weight in the planning balance.

6.3.55 Given the above, consideration of the prescribed matters set out in Regulation 7 (noted in section 2.6 of this Planning Statement) of the Decision Regulations does not materially alter the planning balance for the Proposed Development.

Civil and Military Aviation and Defence Interests

6.3.56 Section 5.5 of NPS EN-1 requires consideration of effects from new energy infrastructure on civil or military aviation and defence interests, including all

aerodromes and communications, navigation and surveillance infrastructure. The Proposed Development is located in the safeguarding buffer zones of RAF Waddington, Peacocks Farm, South Hykeham Airfield, South Scarle Airfield and Blackmoor.

6.3.57 Section 14.3 Glint and Glare of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** presents the findings of an assessment of the likely significant effects from glint and glare as a result of the Proposed Development and concludes that overall, impacts on aviation assets are assessed as acceptable and not significant.

6.3.58 Paragraph 5.5.41 of NPS EN-1 sets out that developments near aerodromes should take into account the risk of bird strike. The approach to the design of bird mitigation was informed by the Ministry of Defence's response to Statutory Consultation, where their principal concern was the creation of new wetland features or the creation of new vegetative habitats that may attract and support populations of large and/or flocking birds hazardous to air traffic. The Ministry of Defence considered that the design of any solar development should take this into account and where possible limit the potential. As shown on Figure 4-4 in the **Design Approach Document [EN010154/APP/7.3]**, the managed arable land and the grassland areas are well distributed throughout the site which, along with ensuring the mitigation land is well integrated into its surrounding and allows for rotation, is an approach that prevents bird flocking. Notwithstanding, with regards to potential for bird strike, there is not a substantial enough change to create a difference in the number of birds to create flocks that are an obstacle to aircraft. The new hedges and trees to accommodate birds are well dispersed across the Order Limits and there are no large wetland areas being created where birds may congregate and then take flight together which could cause an issue for aircraft. In summary, there is no envisaged change to the risk of flocking birds to cause potential issues for aircraft and the assessment of potential glint and glare has found similarly there are no expected issues.

6.3.59 It is noted that there could be a perceived risk from fires to nearby airbases, however as set out in the **Framework BMSP [EN010154/APP/7.17]**, safety and fire prevention measures are in place for the Proposed Development, specifically for the BESS. Whilst the **Framework BSMP [EN010154/APP/7.17]** does not include specific reference to impacts on aviation, the measures proposed seek to minimise any risk of a fire incident through design and operational measures which include control room and BESS monitoring as well as security and maintenance procedures. Additionally, firefighting procedures have considered relevant sensitive receptors within the vicinity of the BESS and these are supported by a robust and validated emergency plan. The **Framework BSMP [EN010154/APP/7.17]** is in alignment with guidance on BESS from the UK National Fire Chiefs Council BESS. A detailed **BSMP** is secured under Requirement 7 set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.

6.3.60 Paragraph 2.11.14 of NPS EN-5 states that *"in order to avoid unacceptable adverse impacts of EMFs from electricity network infrastructure on aviation, the Secretary of State will take account of statutory technical safeguarding zones defined in accordance with Planning Circular 01/03, or any successor, when considering recommendations for DCO applications*". Paragraph 2.11.13 of NPS EN-5 recognises that the undergrounding of a line would reduce the level of EMFs experienced, but magnetic field levels may still be high immediately above the cable.

6.3.61 It has been demonstrated that there are no glint and glare impacts to any civil, military aviation and defence interests, and bird mitigation has been designed taking into considered the statutory consultation response from the Ministry of Defence. As a result, the Proposed Development is in accordance with NPS EN-1 in relation to civil, military aviation and defence interests, resulting in a neutral weighting in the planning balance.

Flood Risk and Drainage

6.3.62 Paragraph 5.8.13 of NPS EN-1 states that *"a site-specific flood risk assessment should be provided for all energy projects in Flood Zones 2 and 3 in England"* involving *"sites of 1 hectare of more"*. The Principal Site is located predominantly within Flood Zone 1, with areas of Flood Zone 2, located within parts of both the south east of the Principal Site and central sections, associated with the River Brent and River Witham. The western extent of the Cable Corridor, west of Broughton Lane is located within areas of Flood Zone 2 and 3. There are also discrete areas immediately east of Broughton Lane located within Flood Zone 2. The remaining areas of the DCO Site are located within Flood Zone 1. Part of the south eastern section of the DCO Site is located within the Witham Washland Flood Compensation Area as shown on **Figure 9-3: Fluvial Flood Risk** of the ES **[EN010154/APP/6.2]**.

6.3.63 A Flood Risk Assessment (**Appendix 9-C: Flood Risk Assessment** of the ES **[EN010154/APP/6.3]**) has been prepared in accordance with the requirements of paragraphs section 5.8 of EN-1 (and the NPPF). The likely effects of the Proposed Development associated with flood risk have been assessed in **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]**. The FRA demonstrates flood risk, from all sources, will not increase as a result of the Proposed Development, within the Order Limits or elsewhere, with the proposed embedded mitigation in place.

6.3.64 A separate Framework Surface Water Drainage Strategy (**Appendix 9-D: Framework Surface Water Drainage Strategy [EN010154/APP/6.3]**) demonstrates how surface water drainage will be managed effectively to ensure there is no increase in surface water runoff from the Proposed Development above the existing regime.

6.3.65 Paragraph 5.8.15 of NPS EN-1 sets out the minimum requirements for Flood Risk Assessments. The requirements are set out in full in **Appendix B: National Policy Accordance Tables** which confirm that **Appendix 9-C: Flood Risk Assessment** of the ES **[EN010154/APP/6.3]** has been prepared in accordance with paragraph 5.8.15 of NPS EN-1.

6.3.66 Paragraphs 5.8.18 to 5.8.20 of NPS EN-1 set out that early discussions with the Environment Agency and other relevant bodies is advised. The engagement with these bodies is discussed in the **Consultation Report [EN010154/APP/5.1]**.

6.3.67 Paragraph 5.8.21 of NPS EN-1 sets out that development should be steered to areas at the lowest risk of flooding before higher risk areas are considered, and reasonably available sites are compared. **Appendix A: Site Selection Report** of this Planning Statement **[EN010154/APP/7.2]** sets out the process and criteria through which the Applicant determined a suitable site to deliver the Proposed Development. The identification of the site for the Proposed Development was driven by the availability of deliverable land and site suitability in accordance with the requirements of policy. Following a formal application to National Grid for a connection into the 400kV Overhead Line at Whisby, National Grid informed the Applicant that this point of connection was not available and instead the Applicant was offered and subsequently secured a point of connection at the proposed National Grid substation near Navenby. Having secured land with willing landowners, and in recognition of the need to consider reasonable alternatives, the Applicant sought to assess the site against other potential alternative sites to ensure it was the most suitable taking into account operational requirements, national and local planning policy and planning and environmental constraints. **Appendix A: Site Selection Report** of this Planning Statement **[EN010154/APP/7.2]**) sets out the approach to assessing the suitability of the site for the Proposed Development and potential alternative sites against a range of planning, environmental and operational criteria for generating stations with capacity of more than 50MW.

6.3.68 The process for the consideration of potential alternative sites was undertaken in five stages. Following identification of an area of search (Stage 1), all planning and environmental constraints including areas at risk of flooding (Flood Zones 2 and 3) were excluded in order to seek to identify a site with no constraints (Stage 2). Following identification of potential sites with all constraints excluded (Stage 3) and their evaluation (Stage 4), it was concluded that the search needed to be widened as it was not possible to identify an appropriate site within the parameters defined for Stages 1 to 4 (Stage 5). Alongside other criteria, land within Flood Zones 2 and 3 was reintroduced back into the area of search. With constraints reintroduced, **Appendix A: Site Selection Report** of this Planning Statement **[EN010154/APP/7.2]**) concludes that the location of the Proposed Development comprises the preferred site when compared with other potential alternative sites when taking into account planning and environmental constraints and operational considerations. Given the initial consideration of areas at low risk of flooding and then higher risk areas, it has been demonstrated that the sequential test has been applied and satisfied as part of site selection.

6.3.69 Paragraph 5.8.23 of NPS EN-1 advises that "*all projects should apply the Sequential Test to locating development within the site.*" Paragraph 5.8.29 of NPS EN-1 also sets out that *the sequential approach should be applied to*

layout and design stating that "vulnerable aspects of development should be located on parts of the site at lower risk and residual risk of flooding".

6.3.70 In accordance with the sequential approach, all proposed buildings, compound areas, the Onsite Substation and BESS and the majority of the solar PV panels will be located in Flood Zone 1. This is in accordance with Design Principle 6 set out in the **Design Approach Document [EN010154/APP/7.3]**, which seeks to ensure that "*The Proposed Development will be designed to be resilient to flood risk now and in the future, with close engagement with the Environment Agency."* The location of solar infrastructure in relation to the Design Principle 6 and the sequential test will be secured via the Design Commitments **as set out in Appendix A-1: Design Commitments** of the **Design Approach Document [EN010154/APP/7.3]** which state:

- No solar stations or other major electrical infrastructure to be located in Flood Zone 2 or 3.
- No above ground solar development within Flood Zone 3.

6.3.71 There are areas where Solar PV panels are located within Flood Zone 2 and the climate change extents of Flood Zone 3a. While there are areas of lower flood risk within the Principal Site, the need to balance areas for solar generation with the provision of environmental mitigation, such as the provision of land for bird mitigation in a dispersed nature in order not to create flocking, and the need to retain intervisibility between heritage assets has resulted in the need for a solar PV panels to be located within areas of Flood Zone 2 and 3a, and there being no reasonably available locations within the site itself. This is required in order for the Proposed Development to maximise the delivery of low carbon renewable energy. The sequential test is therefore considered passed for the Principal Site due to flood risk from any source to be low following the embedded mitigation.

6.3.72 In relation to whether a Sequential Test is required for the cable route, it is the Applicant's view that as cabling is buried underground (there will be no infrastructure above ground that is permanent and, once the cables are installed, the land will be returned to its original use) and the volume of the cable circuit would make a negligible difference to flood depths over a large area, there is no long term flood risk, therefore, the location of the cable route does not need to form part of the sequential test.

6.3.73 In accordance with the requirements of paragraph 5.8.9 of NPS EN-1, the Applicant has applied the Exception Test as the sequential test has demonstrated that, at a site specific level, there are no reasonably available lower risk sites to locate the required solar PV development that would deliver the same amount of renewable energy. In addition, the Proposed Development comprises a solar farm and is defined as "*Essential Infrastructure*" as set out in Annex 3: Flood risk vulnerability classification of the NPPF. Where essential infrastructure is located in areas of Flood Zone 3a, the Exception Test is required to be undertaken. Paragraph 5.8.11 of NPS EN-1 replicates the tests set out in Paragraph 178 of the NPPF which state that:

a. development that has to be in a flood risk area will provide wider sustainability benefits to the community that outweigh flood risk, and

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.

6.3.74 Regarding wider sustainability benefits, the Proposed Development delivers substantial benefits as set out in section 5.3 of this Planning Statement and considered further in the planning balance in Section 7, that would outweigh the flood risk. As set out in section 5.3 of this Planning Statement, the benefits of the Proposed Development related to low carbon renewable energy generation, contribution to decarbonisation, ecological enhancements, provision of permissive paths, job creation and economic benefits.

6.3.75 In relation to whether the development would be safe for its lifetime, **Appendix 9-C: Flood Risk Assessment** of the ES **[EN010154/APP/6.3]** concludes flood risk, from all sources, will not increase as a result of the Proposed Development, within the DCO Site or elsewhere, with the proposed embedded mitigation in place. **Appendix 9-D: Framework Surface Water Drainage Strategy** of the ES **[EN010154/APP/6.3]** demonstrates surface water drainage will be manged effectively to ensure there is no increase in surface water runoff from the Proposed Development above the existing regime. Thus, the Proposed Development satisfies the second requirement of the Exception Test and will remain safe throughout its lifetime without increasing flood risk to third party land. It is considered that the Exception Test has been passed and the Proposed Development is compliant with the relevant section of paragraph 5.8.36 of NPS EN-1.

6.3.76 Paragraph 5.8.36 of NPS EN-1 also sets out that in determining an application for development consent, *"the Secretary of State should be satisfied that the application is supported by an appropriate FRA"*. In addition, paragraph 2.10.84 of NPS EN-3, notes that *"where a flood risk assessment has been carried out, this must be submitted alongside the Applicant's ES. This will need to consider the impact of drainage".* **Appendix 9-C: Flood Risk Assessment** of the ES **[EN010154/APP/6.3]** and **Appendix 9-D: Framework Surface Water Drainage Strategy** of the ES **[EN010154/APP/6.3]** satisfy the relevant provision within paragraph 5.8.36 of NPS EN-1 and paragraph 2.10.84 of NPS EN-3.

6.3.77 Paragraph 5.8.36 of NPS EN-1 also sets out that any proposal should be in line with any relevant national and local flood risk management strategy. It is considered that the Proposed Development is aligned with the aims and intentions of the Lincolnshire Flood Risk and Water Management Strategy, although it is noted that the strategy sets out a more strategic framework for flood management within the county. Therefore, it is considered to be compliant with the relevant section of paragraph 5.8.36 of NPS EN-1 in this regard.

6.3.78 Paragraph 5.8.36 of NPS EN-1 states that the Secretary of State should be satisfied that *"SuDS (as required in the next paragraph on National Standards)*

have been used unless there is clear evidence that their use would be inappropriate." This is discussed in Appendix **9-D: Framework Surface Water Drainage Strategy** of the ES **[EN010154/APP/6.3]**) which aims to mimic the natural drainage conditions as far as possible, by using Sustainable Drainage Systems (SuDS) to manage surface water flows generated by the Proposed Development infrastructure.

6.3.79 Paragraph 5.8.36 of NPS EN-1 outlines that the Proposed Development should *"include safe access and escape routes, as part of an agreed emergency plan".* This is provided in the **Framework CEMP [EN010154/APP/7.7]**, which requires an Emergency Response Plan be prepared by the Contractor prior to construction. The Emergency Response Plan will provide details of the response to an impending flood. The Proposed Development is considered compliant with the relevant section of paragraph 5.8.36 of NPS EN-1.

6.3.80 Paragraph 5.8.41 of EN-1 states that "*energy projects should not normally be consented within Flood Zone 3b, or Zone C2 in Wales, or on land expected to fall within these zones within its predicted lifetime. This may also apply where land is subject to other sources of flooding (for example surface water). However, where essential energy infrastructure has to be located in such areas, for operational reasons, they should only be consented if the development will not result in a net loss of floodplain storage, and will not impede water flows*." **Appendix 9-C: Flood Risk Assessment** of the ES **[EN010154/APP/6.3]**) confirms that there is no permanent above ground infrastructure proposed for the operational phase within the 1 in 100 year + Climate Change Flood Zone 3a extents or within the 1 in 30 year Flood Zone 3b extent (functional floodplain).

Summary

6.3.81 **Appendix 9-C: Flood Risk Assessment** of the ES **[EN010154/APP/6.3]** concludes there will to no increase in flood risk and no significant residual effects as a result of the Proposed Development with the embedded mitigation measures set out in **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]**, use of good practice measures, with such mitigation and measures secured through Requirements 6 (detailed design), 10 (surface and foul water drainage), 12 (CEMP), 13 (OEMP), and 20 (DEMP) set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1].** These measures include **Appendix 9-D: Framework Surface Water Drainage Strategy** of the ES **[EN010154/APP/6.3]** which demonstrates with the measures applied within it, there will be no increase in surface water runoff from the Proposed Development.

6.3.82 The Proposed Development passes both the Sequential and Exception Test.

6.3.83 In summary, it has been demonstrated that the Proposed Development is in accordance with the relevant policies in relation to flood risk and drainage. As a result, the Proposed Development is considered to present a neutral weighting in the planning balance with regard to flood risk and drainage.

Historic Environment

6.3.84 As stated in paragraph 5.9.1 of NPS EN-1 *"The construction, operation and decommissioning of energy infrastructure has the potential to result in adverse impacts on the historic environment above, at and below the surface of the ground" and* paragraph 5.9.9 of NPS EN-1 requires the applicant to *"undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA and describe these along with how the mitigation hierarchy has been applied in the ES"*.

6.3.85 **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]** presents the assessment findings of the likely significant effects on cultural heritage as a result of the Proposed Development in accordance with paragraphs 5.9.9 to 5.9.15 of NPS EN-1 and paragraphs 2.10.107 to 2.10.119 of NPS EN-3.

6.3.86 Paragraph 5.9.10 of NPS EN-1 further outlines that the ES should describe the significance of heritage assets. This is set out in **Table 7-9** of **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]**. Paragraph 5.9.11 of NPS EN-1 states *"Where a site on which development is proposed 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."* This is included **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]** and accompanying appendices including **Appendix 7-B: Cultural Heritage Desk-Based Assessment** and **Appendix 7-I Trial Trenching Report (Interim)** of the ES **[EN010154/APP/6.3]**.

Assets

6.3.87 The Proposed Development is located within an area which has cultural heritage assets of varying type, significance and value, summarised in Sections 3.2 and 3.3 of this Planning Statement. The impact of the Proposed Development upon these heritage assets has been a key consideration in the design evolution of the Proposed Development as demonstrated with the focussed Design Principle on the historic environment, as set out in the **Design Approach Document [EN010154/APP/7.3]** which requires the Proposed Development to *"be sensitive to heritage assets, providing suitable offsets, and including protecting views to Lincolnshire Cathedral".* Accordingly, the design of the Proposed Development has considered protecting heritage assets at each step of the design process. This includes recognition of Policy S58 (Protecting Lincoln, Gainsborough and Sleaford's Setting and Character) of the Central Lincolnshire Local Plan in the Design Principle which sets out that all development proposals should *"Protect the dominance and approach views of Lincoln Cathedral, Lincoln Castle and uphill Lincoln on the skyline".*

6.3.88 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 Proposed Development and has proposed avoidance and mitigation strategies wherever possible.

6.3.89 For the majority of assets, the effects presented in **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]** have been assessed as being not significant and would not affect their value, due to lack of relevant associations, intervisibility or as a result of the embedded mitigation measures, as set out in **Appendix 7-D: Detailed Heritage Asset Setting Assessment** of the ES **[EN010154/APP/6.3]**. As such, it is concluded that there is no harm caused to these assets as a result of the Proposed Development and they are now discussed further.

6.3.90 It is acknowledged that the presence of infrastructure or landscape screening during the operation phase may cause changes or alterations (beneficial or adverse) to the setting of heritage assets, which may affect their value. These impacts are long-term for infrastructure, or permanent in respect of planting, for the operational duration of the Proposed Development, but are reversible.

6.3.91 There are two designated assets which are assessed to be affected by the Proposed Development, as discussed below.

Grade II Listed River Farmhouse (NHLE 1168186)

6.3.92 The Grade II listed River Farmhouse is situated within a small parcel of land excluded from, but surrounded by, the Principal Site. The Proposed Development has taken account of the sensitivities associated with the setting of this Grade II Listed Building through careful design. Solar PV Arrays have been set back from the asset, providing a buffer within its immediate surroundings, with the nearest panels to be located approximately 175m to the south, approximately 170m to the south west, with the solar array to the north west of the asset to be offset and stepped back to a distance of approximately 330m. Further mitigation includes additional tree and hedgerow planting around the boundaries of the adjacent Solar PV Arrays and Solar Stations, and the proposed screening by Year 15 would help reduce the effects of the visual change as illustrated on the photomontages of Viewpoint No. 22 (**Figure 10-8: Viewpoint Photography** of the ES [**EN010154/APP/6.2]**).

6.3.93 The Proposed Development will not change the physical or experiential character of the building's immediate setting. However, considering the reversibility and embedded mitigation measures, and the relative contribution of the wider landscape to the value and heritage significance of this asset, it has been concluded that during the operation, the Proposed Development would slightly alter the wider setting of the listed building in a way which would have a minor impact on the experience and understanding of its special interest, and will therefore result in less than substantial harm (at the lower end of the scale) to the significance of the asset. Whilst there is no direct correlation between the classification of effect as reported in **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]** the level of harm caused to heritage value, the measured significance of effect may be equated to key concepts in planning policy and heritage guidance.

Grade II Listed Grange Cottage (NHLE 1061951)

6.3.94 The Grade II listed Grange Cottage is located alongside Bassingham Road, directly adjacent to the eastern edge of the Principal Site. The heritage values

and setting of this designated heritage asset have informed the design of the Proposed Development. The PV Solar Array to the west, on the other side of Bassingham Road, is set back ensuring a minimum 65m buffer from Grange Cottage. To the south, the buffer from the Solar PV Array is minimum of 100m. The nearest Solar Stations are over 200m away from the asset to the south west. The BESS compound, which takes account of existing screening, lies over 240m to the south east. In addition to existing hedgerows and trees, additional planting (trees and proposed tree belt) are proposed to screen the BESS. Planting will also introduce screening to block intervisibility where possible with the BESS.

6.3.95 The assessment set out in **Appendix 7-D: Detailed Heritage Asset Setting Assessment** of the ES **[EN010154/APP/6.3]** considered the Listed Building and its setting in detail, including the contribution of the Principal Site. It concluded that the Proposed Development would not affect the asset's physical fabric (the key contributor to its significance) or the physical or experiential character of the asset's immediate setting (comprising its surrounding plot and location alongside Bassingham Road). The surrounding DCO Site, however, also contributes to the asset's significance as part of its wider setting, allowing the appreciation of Grange Cottage as a vernacular residential dwelling in a historically rural, agricultural landscape. The introduction of the components of the Proposed Development within the rural setting of the asset, due to close proximity and visibility of the Proposed Development from the asset's grounds (including BESS), would affect, albeit to a small degree, the way the asset is experienced in its surrounding agricultural landscape and its value as such would be slightly reduced. There will also be some visibility of the solar panels and the BESS compound, in the view towards the asset's north east elevation from Bassingham Road, both in longer-distance and closer views (see VP35b, ES Figure 10-8: Viewpoint Photography **[EN010154/APP/6.2]**). However, taking into account the proposed embedded mitigation measures and reversibility of the Proposed Development, will result in minor adverse change to the way this asset is experienced within the agricultural landscape over the duration of operation of the Proposed Development in the long-term (60 years).

6.3.96 The assessment set out in **Appendix 7-D: Detailed Heritage Asset Setting Assessment** of the ES **[EN010154/APP/6.3]** concluded that during operation, the Proposed Development would result in a reversible long-term low adverse magnitude of impact on Grade II Listed Grange Cottage, an asset of Medium value as described in **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]**, leading to a less than substantial harm within the lower end of the scale and no significant effect.

6.3.97 There is also one non designated asset assessed to be affected as described below.

Tonge's Farm (non-designated, MLI119774)

6.3.98 Tonge's Farm, a former 19th century farmstead now in use as holiday accommodation, is located directly to the west of the Principal Site. The assessment detailed in **Chapter 7: Cultural Heritage** of the ES

[EN010154/APP/6.1] concluded that the Proposed Development, including planting, within the Principal Site, would affect the way the asset is experienced as a former farmstead in a rural location, although it should be noted the asset's setting had been already altered and the relative contribution of this wider landscape is minimal. The Chapter concludes that during operation, the Proposed Development would result in a low adverse magnitude of impact on Tonge's Farm, an asset of Low value, leading to very limited harm to a non-designated asset.

6.3.99 NPS EN-3 paragraphs 2.10.107 and 2.10.108 notes that solar PV developments can impact the setting of heritage assets as well as potentially having direct impacts on archaeological deposits. Paragraph 2.10.110 highlights that Solar PV development has the potential to result in a positive effect on heritage assets, due to Solar PV development removing fields from regular ploughing or low-level piling.

6.3.100 For archaeology assets, during construction, the Proposed Development within the Principal Site for the piling, topsoil stripping and excavations, is anticipated to be very limited in area, resulting in only minor adverse effects upon most classes of archaeological features. Specifically, with regard to the piling, the quantity of displaced archaeological remains in the case of larger features such as infilled ditches or furrows would be insignificant compared to that left undisturbed. As assessed in the **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]**, the known and potential remains are expected to be of no greater than Medium value (based on surveys completed to date and on the identified potential for further remains which may be encountered in trial trench evaluation), this magnitude of impacts would result in no significant effects.

Harm

6.3.101 Paragraph 5.9.27 of 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."* The careful design of the Proposed Development and appropriate offsets and buffers, along with screening mitigation measures, has demonstrated compliance with this policy.

6.3.102 Paragraph 5.9.28 of NPS EN-1 goes on to state that *"Any harm or loss of significance affecting any designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification."* As a result of careful design and following the implementation of mitigation measures, all residual effects are assessed in **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]** as not significant and apart from River Farmhouse, Grange Cottage and Tonge's Farm as set out above, the Proposed Development will not result in any harm. The justification for the less than substantial harm caused to River Farmhouse, Grange Cottage an Tonge's Farm relates to the urgent need for the Proposed Development, as described in Section 5 of this Planning Statement where it is

clear that it will make a contribution to supporting net zero and the security of supply in addition to contributing to affordability and the reduction of costs for consumers.

6.3.103 In cases where substantial harm to a heritage asset would result, NPS EN-1 paragraph 5.9.31 explains that *"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."* There are no instances of substantial harm to designated heritage assets as a result of the Proposed Development.

6.3.104 Where development results in less than substantial harm to the significance of heritage assets, NPS EN-1 paragraph 5.9.32 states that *"this harm should be weighed against the public benefits of the proposal."*

6.3.105 The substantial public benefits for the Proposed Development, as set out in section 5.3 of this Planning Statement, include low carbon renewable energy generation, contribution to decarbonisation, ecological enhancements, provision of permissive paths, job creation and economic benefits. Furthermore, in terms of need, the Proposed Development comprises CNP infrastructure that will contribute towards meeting national energy security objectives and carbon reduction commitments. The need and benefits of the Proposed Development, clearly and demonstrably outweigh the less than substantial harm to designated heritage assets.

6.3.106 Paragraph 4.2.16 of NPS EN-1 outlines that *"The Secretary of State will take as the starting point for decision making that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances."*

6.3.107 Paragraph 4.2.17 of NPS EN-1 adds a non-exhaustive list of tests that the Secretary of State will consider including the requirement for the substantial public benefits of a project to outweigh substantial harm or loss of a heritage asset. It states that *"The Secretary of State will take as a starting point that CNP Infrastructure will meet the following, non-exhaustive, list of tests…where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional."*

6.3.108 As set out, the need case for, and public benefits of, CNP infrastructure is sufficient to outweigh substantial harm to the heritage assets. The need case for, and public benefits of, CNP infrastructure will also outweigh impacts on the significance of the heritage assets that amount to less than substantial harm (at the lower end of the scale).

Summary

6.3.109 In terms of impacts to archaeology and designated heritage assets, historic buildings and historic landscape elements, the assessment of the Proposed Development has concluded that there would be no adverse effects.

Notwithstanding, the Proposed Development will lead to less than substantial harm (at the lower end of the scale) to the significance of two designated heritage assets and one non-designated asset as described above. However, it has been demonstrated that the substantial benefits of the Proposed Development outweigh the harm to these assets. As a result, the Proposed Development is in accordance with paragraph 5.9.32 of NPS EN-1 which states "*Where the proposed development will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal".*

6.3.110 Therefore, the Proposed Development is in accordance with national and local policy with regard to cultural heritage. Nonetheless, due to there being less than substantial harm (at the lower end of the scale), it is afforded moderate to limited negative weight in the planning balance. The consideration of the prescribed matters set out in Regulation 3 of the Decision Regulations (discussed in Section 2.6 of this Planning Statement) does not materially alter the planning balance for the Proposed Development.

Landscape and Visual

6.3.111 The Order Limits have a predominantly rural character and consideration of the landscape has been integral to the design of the Proposed Development. The design has sought to respect the wider landscape and the intrinsic value of the countryside and natural environment.

6.3.112 Section 5.10 of NPS EN-1 sets out the policy for landscape and visual impacts, with paragraph 5.10.1 of NPS EN-1 stating, *"The landscape and visual effects of energy projects will vary on a case by case basis according to the type of development, its location and the landscape setting of the proposed development."* Paragraph 5.10.4 of NPS EN-1 also states that *"Landscape effects arise not only from the sensitivity of the landscape but also the nature and magnitude of change proposed by the development, whose specific siting and design make the assessment a case-by-case judgement".*

6.3.113 There is an acknowledgement in paragraph 5.10.13 of NPS EN-1 that *"All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites"* and as set out in paragraph 5.10.14 of NPS EN-1 *"The Secretary of State 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."*

6.3.114 Paragraph 5.10.16 of NPS EN-1 (and paragraph 2.10.97 of NPS EN-3) states that *"The applicant should carry out a landscape and visual impact assessment and report it in the ES"*, and 5.10.17 of NPS EN-1 further states that *"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".* Paragraphs 5.10.16 to 5.10.25 of NPS EN-1 set out what the assessments should include.

6.3.115 Paragraphs 2.10.93 to 2.10.101 of NPS EN-3 set out the solar specific landscape, visual and residential amenity policy for energy infrastructure.

Paragraph 2.10.95 notes *"whilst it may be the case that the development covers a significant surface area, in the case of ground-mounted solar panels it should be noted that with effective screening and appropriate land topography, the area of a zone of visual influence could be appropriately minimised."*

6.3.116 Paragraph 135 (c) of the NPPF states that planning decisions should ensure developments are "*sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change"*. Policy S14 (Renewable Energy) of the Central Lincolnshire Local Plan states that *"development for renewable energy schemes, including ancillary development, will be supported where the direct, indirect, individual and cumulative impacts on the following considerations are, or will be made, acceptable. To determine whether it is acceptable, the following tests will have to be met: i. The impacts are acceptable having considered the scale, siting and design, and the consequent impacts on landscape character; visual amenity…"*.

6.3.117 **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** presents the findings of an assessment of the likely significant effects of the Proposed Development upon the landscape character and visual amenity. This should be read alongside **Appendix 10-E: Landscape Assessment** of the ES **[EN010154/APP/6.3]** and **Appendix 10-F: Visual Assessment** of the ES **[EN010154/APP/6.3]**. Consideration of the landscape and visual effects for the Proposed Development started at the site selection stage, described in full in the **Appendix A: Site Selection Report** of this Planning Statement **[EN010154/APP/7.2]**. In summary, the site assessment recognised that the Lincoln Cliff Area of Great Landscape Value (AGLV) is located within the proposed area of search and thus sought to avoid this. Policy S62 (Areas of Outstanding Natural Beauty and Areas of Great Landscape Value) of the Central Lincolnshire Local Plan sets out that Areas of Great Landscape Value are locally designated landscape areas recognised for their intrinsic character and beauty and their natural, historic and cultural importance and therefore afforded a high level of protection which reflects their locally important high scenic quality, special landscape features and sensitivity. As a result, during the assessment of potential sites, sites that were located directly in the AGLV were afforded less weight. The Principal Site of the Proposed Development is not located in the AGLV (although it does intersect the Cable Corridor but the cable is buried and not visible) demonstrating in accordance with Paragraph 5.10.19 of NPS EN-1 that *"The applicant should consider landscape and visual matters in the early stages of siting and design, where site choices and design principles are being established".*

6.3.118 Section 10.6 of **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** sets out that good design has been a key consideration for the Proposed Development from the outset with the landscape and visual impact assessment being informed by the iterative design process, guided by Design Principles.

6.3.119 The **Design Approach Document [EN010154/APP/7.3]** sets out how Design Principles have provided a framework for evolution of the Proposed Development's design. The relevant Design Principles are:

a. The Proposed Development will be sensitively integrated into its landscape setting, to minimise adverse landscape and visual effects as far as possible.

b. The Proposed Development will respond sensitively to its proximity to residential dwellings, village settlements and caravan park with regard to visual impact, noise and lighting.

c. The Proposed Development will be designed to align with field boundaries and existing landscape features. It will seek to retain any existing vegetation and minimise watercourse crossings where practicable.

d. The Proposed Development will enhance, where possible, the existing connectivity within the network of PRoW through the provision of permissive paths and circular routes to be available for public use during the operation of the authorised development to improve accessibility.

6.3.120 The Design Principles are supported by the Design Commitments set out in **Appendix A: Design Commitments** of the **Design Approach Document [EN010154/APP/7.3]** which will be secured under Requirement 6 set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.

6.3.121 **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** anticipates that there will be impacts to landscape and visual receptors during construction, operation and decommissioning.

6.3.122 Paragraph 5.10.1 of NPS EN-1 states that *"The landscape and visual effects of energy projects will vary on a case by case basis"* and paragraph 5.10.5 of NPS EN-1 recognises that *"Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation".*

6.3.123 This reduction of impact and mitigation is described in full in **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** in accordance with Paragraph 5.10.6 of NPS EN-1 which states that *"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".* The Proposed Development has been designed carefully, aiming to avoid or minimise harm to the landscape and providing reasonable mitigation where possible and appropriate.

6.3.124 For the design, the solar PV panels and associated infrastructure have been sited to preserve, as far as possible, cross valley views from Thorpe on the Hill and important views towards Lincoln Cathedral available from Tunman Hill. For larger infrastructure, such as the Onsite Substation and BESS compound, these have been located within areas of enclosed landscape, bound by frequent small woodlands and hedgerows, in order to minimise potential visual effects.

6.3.125 Along with careful siting, offsets have been used to reduce impacts, as can be seen with the Principal Site being mostly set back from settlement boundaries, such as fields immediately adjacent to Bassingham, Thorpe on the Hill and Morton Lane. Where this has not been possible, offsets (typically measuring in excess of 100m) and new planting have been incorporated to retain a sense of openness whilst screening the solar PV panels. This supports paragraph 2.10.98 of NPS EN-3 which states "*Applicants should follow the criteria for good design set out in Section 4.7 of EN-1 when developing projects and will be expected to direct considerable effort towards minimising the landscape and visual impact of solar PV arrays especially within nationally designated landscapes*".

6.3.126 Further to this, a **Framework LEMP [EN010154/APP/7.15]** is secured under Requirement 8 set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]** which includes provision for the successful establishment and future management of biodiversity, habitat creation, and landscaping works. It sets out the short and long-term measures and practices that will be implemented to establish, monitor, and manage landscape and ecology mitigation and enhancement (biodiversity net gain) measures embedded in the design.

6.3.127 Despite the mitigation measures in place, in the context of Paragraph 4.7.6 of NPS EN-1 which states *"Whilst the applicant may not have any or very limited choice in the physical appearance of some energy infrastructure",* it is acknowledged that, as set out from **Table 10-11** of **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]**, there are significant residual effects as a result of the Proposed Development. For all significant residual effects, impacts to landscape character and visual receptors during the construction and decommissioning stages will be short term and temporary. However, these effects are assessed to be significant and the Proposed Development would impact on the existing landscape character and on peoples' visual amenity during both construction and operation.

6.3.128 Once the Proposed Development is operational, the number of significantly affected character areas is reduced by half. This is the result of the underground cable that will not alter the character of the Landscape Character Areas (LCAs) across the Cable Corridor. The significant effects will further reduce as the mitigation planting will be established at year 15 and replace the vegetation lost at the construction phase, enhancing landscape pattern, and helping integrate the Proposed Development within the surrounding landscape. The landscape effects during the decommissioning phase will be similar to those during the construction phase, apart from the LCAs across the Cable Corridor, which will be affected to a negligible degree.

6.3.129 However, the following landscape receptors will experience residual long-term and reversible moderate adverse (significant) effects in winter and summer during year 15 of operation of the Proposed Development:

a. LLCA 03: Tunman Hill; and

b. LLCA 08: Thurlby Fenland.

6.3.130 The visual receptors are equally most impacted during the construction phase, and the number of significant effects will drop by half at the year 1 operation of the Proposed Development. Once the proposed planting is established, in many instances, the views of the Proposed Development will be filtered or screened. At year 15 operation, many of the identified recreational users of the PRoW will still experience significant effects due to the short distance, large exposure or substantial alteration of the current view. The mitigation measures for all of the residential receptors (save for Grange Cottage) will result in no significant effects. The number of significant effects during decommissioning will be smaller than at construction due to the proposed mitigation planting, which will additionally screen or filter the views.

6.3.131 The following visual receptors will experience residual moderate adverse effects during year 15 of operation of the Proposed Development:

a. Residents of Grange Cottage, Moderate adverse (significant) in winter.
b. Recreational users of PRoW west of Thorpe on the Hill (TOTH/7/2, TOTH/21/1, TOTH/6/2, TOTH/6/3). Moderate adverse (significant) in summer.
c. Recreational users of TOTH/11/1. Moderate adverse (significant) in winter.
d. Recreational users of TOTH/12/3. Moderate adverse (significant) in winter and summer.
e. Recreational users of TOTH/15/1. Moderate adverse (significant) in winter.
f. Recreational users of Bass/22/1, Bass/21/2, Bass/20/1. Moderate adverse (significant) in winter.

6.3.132 The following visual receptors will experience residual major adverse effects during year 15 of operation of the Proposed Development:

a. Recreational users of PRoW west of Thorpe on the Hill (TOTH/7/2, TOTH/21/1, TOTH/6/2, TOTH/6/3). Major adverse (significant) in winter.
b. Recreational users of Aubo/8/1. Major adverse (significant) in winter and summer.

6.3.133 Whilst the Proposed Development would impact on the existing landscape character and on visual amenity during both construction and operation. It is important to reference the CNP and temporary and reversible nature of the Proposed Development and that in accordance with Paragraph 4.2.15 of NPS EN-1, *"Where residual non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. Therefore, in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts."*

Summary

6.3.134 Given the above, and as concluded in **Chapter 10: Landscape and Visual Amenity** of the **ES [EN010154/APP/6.1]**, it is evident that there will be an

adverse impact on the surrounding landscape and visual impact caused by the Proposed Development during the operational phase and there will be long-term moderate to major adverse effects on landscape character and visual amenity. In most instances, these impacts can be adequately mitigated but, in some instances, there will be residual adverse impacts resulting in harm which needs to be weighed in the planning balance. This harm is tempered by other instances where current landscape and visual impacts are improved such as hedgerow gapping up, strengthening field boundaries and biodiversity improvements.

6.3.135 In this context, it is important to note that in accordance with Paragraph 5.10.35 of NPS EN-1, "*the scale of energy projects means that they will often be visible across a very wide area. The Secretary of State should judge whether any adverse impact on the landscape would be so damaging that it would not be offset by the benefits (including need) of the project.*" The benefits of the Proposed Development are set out in Section 5.3 of this Planning Statement and the **Statement of Need [EN010154/APP/7.1]**. As described previously, the Proposed Development is defined in policy as of critical national importance.

6.3.136 It is demonstrated through the Proposed Development that all reasonable steps have been taken to avoid, reduce, and where necessary, mitigate these impacts. The majority of effects are of a long term, reversible nature. The Proposed Development has aligned with Policy S14 (Renewable Energy) of the Central Lincolnshire Local Plan which includes the test for renewable energy that *"The impacts are acceptable having considered the scale, siting and design, and the consequent impacts on landscape character".*

6.3.137 The approach adopted, via the use of control documents and detailed management plans, is in keeping with the intent of Paragraph 5.10.24 of NPS EN-1, which considers *"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."*

6.3.138 The Proposed Development is therefore in accordance with the relevant landscape and visual impact planning policies taken as a whole, noting that there are some adverse and beneficial effects. With mitigation measures incorporated into the design where possible, the Proposed Development is considered to align with the relevant objectives of the NPS, NPPF, and local planning policies and this matter should be accorded moderate negative weight in the planning balance.

Land Use, including Open Space, Green Infrastructure, and Green Belt

6.3.139 Paragraph 5.11.1 of NPS EN-1 recognises that energy infrastructure projects will have a direct effect on the existing use of the site and may have indirect effects on the use or planned use of land within the vicinity for other types of development. Paragraph 5.11.2 makes reference to the Green Belt; however, it should be noted that the Proposed Development is not located in the Green Belt.

Previously Developed Land

6.3.140 Paragraph 5.11.3 of NPS EN-1 sets out that using previously developed land may not be possible for many forms of energy infrastructure. **Appendix A: Site Selection Report** of this Planning Statement **[EN010154/APP/7.2]** demonstrates that previously developed land over 1ha was considered at site selection stage. Appendix **A: Site Selection Repor**t of this Planning Statement **[EN010154/APP/7.2]** concluded that there were no sites available at a sufficient size to accommodate the Proposed Development, either individually or in combination with other sites.

Soil Resources

6.3.141 Paragraph 5.11.4 of NPS EN-1 states that *"Development of land will affect soil resources, including physical loss of and damage to soil resources, through land contamination and structural damage."* Furthermore, paragraph 2.10.34 of NPS EN-3 encourages applicants to "*develop and implement a Soil Resources and Management Plan which could help to use and manage soils sustainably and minimise adverse impacts on soil health and potential land contamination*".

6.3.142 With respect to the management of soil during construction, the **Framework SMP [EN010154/APP/7.10]** contains measures to reduce impacts on soil including management of soil in terms of soil stripping, topsoil and subsoil.

6.3.143 During operation of the Proposed Development, **Chapter 12: Socio-Economics and Land use** of the ES **[EN010154/APP/6.1]** sets out that suspension of cultivation for annual crops within the solar array areas creates an opportunity for improvement to soil structure and development of soil organic matter, and that the benefits of storing more carbon in soils is recognised by the British Society of Soil Science. When the Proposed Development is decommissioned, the soil resource will be returned to its previous agricultural use. **Chapter 12: Socio-Economics and Land use** of the ES **[EN010154/APP/6.1]** concludes no significant effects in relation to soil resources.

Contamination

6.3.144 Paragraph 5.11.5 of NPS EN-1 sets out that where pre-existing land contamination is being considered the objective is to ensure that the site is suitable for its intended use. In addition, paragraph 5.11.17 of NPS EN-1 states that "*Applicants should ensure that a site is suitable for its proposed use, taking account of ground conditions and any risks arising from land instability and contamination*." Furthermore, Policy S56 (Development on Land Affected by Contamination) of the Central Lincolnshire Local Plan states that development will not be permitted if it significantly impacts on groundwater, while the layout and drainage must take account of ground conditions and contamination.

6.3.145 Section 14.4 of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** assesses the impact of the Proposed Development on ground conditions. A Preliminary Risk Assessment (PRA) has been

undertaken to assess the land condition and identify potential environmental land quality liabilities and constraints prior to the construction of the Proposed Development. A summary of the baseline conditions is described within **Appendix 14-C: Phase 1 Preliminary Risk Assessment** of the ES **[EN010154/APP/6.3]**.

6.3.146 The assessment of potential severity, likelihood of occurrence and potential risk associated with each contaminant linkage set out in the assessment is presented in the Phase 1 PRA report (**Appendix 14-C: Phase 1 Preliminary Risk Assessment** of the ES **[EN010154/APP/6.3]**). The potential risks that have been identified from potential contaminated land have been assessed by the PRA as being very low to moderate/low for human health, controlled waters and other sensitive receptors. The highest risks have been identified in the areas formerly occupied by Swinderby Airfield.

6.3.147 Taking into account that the embedded mitigation and the additional mitigation measures are implemented as indicated in Sections 11, 12, 14 and 15 of **Appendix 14-C: Phase 1 Preliminary Risk Assessment** of the ES **[EN010154/APP/6.3]**, and as summarised in the **Framework CEMP [EN010154/APP/7.7]**, no likely significant effects are anticipated. In summary, impacts of the Proposed Development on ground conditions can be appropriately controlled to acceptable standards and further investigation will be undertaken if required to understand potential areas of contamination. The Proposed Development is therefore in accordance with NPS EN-1 and relevant local planning policies regarding potential impacts on ground conditions.

Green Infrastructure

6.3.148 Paragraph 5.11.7 of NPS EN-1 recognises that green and blue infrastructure can also enable developments to provide positive environmental, social, health and economic benefits. One of the overarching aims in the **Framework LEMP [EN010154/APP/7.15]** is to strengthen green infrastructure within the area. This will be achieved through improvements to hedgerows, tree and shrub planting and restoration of ponds which will improve landscape structure and ecological connectivity.

6.3.149 Paragraph 5.11.8 of the NPS EN-1 sets out that the ES 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. **Chapter 12: Socio-Economics and Land use** of the ES **[EN010154/APP/6.1]** considers land use and concludes no effects at construction, operation or decommissioning. As set out in section 3.4 of this Planning Statement, the Applicant is aware of a planning application submitted to North Kesteven District Council for a BESS scheme on land within the Cable Corridor (application reference: 25/0533/FUL). The Applicant is working collaboratively in discussions with the applicant, NatPower, to ensure a joined up approach and to ensure that both projects can be delivered.

Agricultural Land

6.3.150 Paragraph 5.11.12 of NPS EN-1 states that *"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)"*. Furthermore, paragraph 5.11.34 of NPS EN-1 advises that the Secretary of State should ensure that applicants *"do not site their scheme on the best and most versatile agricultural land without justification"* although paragraph 2.10.30 of NPS EN-3 notes that *"development of ground mounted solar arrays is not prohibited on Best and Most Versatile agricultural land"*. The Written Ministerial Statement (WMS) dated 15 May 2024 (Ref. 35) relates to solar development and balancing the need for this type of development to deliver low carbon renewable energy and energy security with the need to protect food security and the best and most versatile agricultural land. The WMS states that *"For all applicants the highest quality agricultural land is least appropriate for solar development and as the land grade increases, there is a greater onus on developers to show that the use of higher quality land is necessary. Applicants for Nationally Significant Infrastructure Projects should avoid the use of Best and Most Versatile agricultural land where possible"*.

6.3.151 Policy S14 (Renewable Energy) of the Central Lincolnshire Local Plan sets out that the transition to net zero is supported alongside appropriately located renewable energy. Policy S14 sets out a presumption in favour of ground based photovoltaics unless the proposal is located on best and most versatile (BMV) land and does not meet the requirements of Policy S67 (Best and Most Versatile Agricultural Land) which states that BMV land would only be supported where the need is justified, the benefits outweigh the need to protect the land, impacts are minimised and that land is restored to its former use on completion of the development. Policy S67 requires an agricultural Land Classification Report for sites over 1ha that result in the loss of BMV land.

6.3.152 The Proposed Development is located principally on agricultural land, however once it is decommissioned, the land will be returned to its original use, and farming could re-commence. Agricultural use above the cable route can continue during operation of the Proposed Development, with cabling below the depth of agricultural cultivations. It should be noted that some small areas used for habitat creation may not be returned to its original use, of which only 1.5ha is BMV agricultural land.

6.3.153 The Applicant's Site Selection Report is set out in in **Appendix A: Site Selection Report** of this Planning Statement **[EN010154/APP/7.2]** and explains the Applicant's approach to site selection. The identification of the site for the Proposed Development was driven by the availability of deliverable land and site suitability in accordance with the requirements of policy. Following a formal application to National Grid for a connection into the 400kV Overhead Line at Whisby, National Grid informed the Applicant that this point of connection was not available and instead the Applicant was offered and subsequently secured a point of connection at the proposed National Grid substation near Navenby. Having secured land with willing landowners, and in recognition of the need to consider reasonable alternatives, the Applicant

sought to assess the site against other potential alternative sites to ensure it was the most suitable taking into account operational requirements, national and local planning policy and planning and environmental constraints. **Appendix A: Site Selection Report** of this Planning Statement **[EN010154/APP/7.2]**) sets out the approach to assessing the suitability of the site for the Proposed Development and potential alternative sites against a range of planning, environmental and operational criteria for a generating station with capacity of more than 50MW.

6.3.154 The site selection process was undertaken in five stages. Following identification of an area of search (Stage 1), all planning and environmental constraints including best and most versatile agricultural land (grades 1, 2 and 3) were excluded in order to seek to identify a site with no constraints (Stage 2). Following identification of potential sites with all constraints excluded (Stage 3) and their evaluation (Stage 4), it was concluded that the search needed to be widened as it was not possible to identify an appropriate site within the parameters defined for Stages 1 to 4 (Stage 5). Alongside other criteria, grade 3 best and most versatile agricultural land was reintroduced back into the area of search. With constraints reintroduced, **Appendix A: Site Selection Report** of this Planning Statement **[EN010154/APP/7.2]**) concludes that the location of the Proposed Development comprises the preferred site when compared with other potential alternative sites when taking into account planning and environmental constraints, including BMV agricultural land, and operational considerations.

6.3.155 On the basis of the provisional mapping used in **Appendix A: Site Selection Report** of this Planning Statement **[EN010154/APP/7.2]**, the vast majority of land within the Proposed Development was shown to be Grade 3 agricultural land, subsequent Agricultural Land Classification surveys have shown that there is no Grade 1 or 2 agricultural land within the Order Limits, as reported in **Appendix 12-B: Agricultural Land Classification Report** of the ES **[EN010154/APP/6.3]**. Furthermore, it should be noted that a potential alternative site that was closer to the point of connection at the proposed National Grid substation near Navenby, known locally as The Heath, was discounted on the basis that it was comprised principally of Grade 2 BMV land.

6.3.156 Consideration of BMV land has continued to influence the design of the Proposed Development as this has evolved. Design Principle 2 of the **Design Approach Document [EN010154/APP/7.3]** states that *"The Proposed Development will be sensitive to the existing agricultural land quality in Lincolnshire, reducing the amount of development (and in particular permanent land take) on Best and Most Versatile quality land where possible."* An early design decision was made that the cable from the Principal Site to the proposed National Grid substation near Navenby would be buried underground in order to reduce visual impact and to minimise the land take of Best and Most Versatile quality land. Furthermore, a slight reduction in the width of the Cable Corridor was made to remove land from the proposals that was no longer required. It should be noted that the Cable Corridor currently remains wide due to the uncertainty of the connection point at the proposed

National Grid substation near Navenby, however it is anticipated that that this will be substantially reduced at the detailed design stage.

6.3.157 The results of an agricultural land classification (ALC) survey are set out in **Appendix 12-B: Agricultural Land Classification Report** of the ES **[EN010154/APP/6.3]**. For the Principal Site, the ALC survey concluded the following:

a. Subgrade 3a - 27.8%

b. Subgrade 3b - 68.9%

c. Non-agricultural land – 1.5%

d. 1.8ha was inaccessible.

6.3.158 Therefore, the ALC survey concluded that land within the Principal Site is predominantly subgrade 3b (moderate quality agricultural land), although some BMV land of subgrade 3a (good quality agricultural land), and some non-agricultural land, is present. There were no areas of ALC Grade 1 or 2 identified within the Principal Site, (Grades 1 and 2 are highest quality of BMV land). An ALC survey of the Cable Corridor has not been undertaken, but based on Natural England online mapping resource, it is located within predominantly Grade 3 ALC land, with a small area of Grade 4 land located to the west of Navenby.

6.3.159 **Chapter 12: Socio-Economic and Land Use** of the ES **[EN010154/APP/6.1]** presents the findings of an assessment of the likely significant effects on Socio-Economics and Land Use as a result of the Proposed Development. This includes consideration of the potential for impacts with regards to agricultural land impacted by the Proposed Development during its construction, operation and decommissioning. **Chapter 12: Socio-Economics and Land use** of the ES **[EN010154/APP/6.1]** concludes no significant effects in relation to agricultural land.

6.3.160 To minimise the impacts of the Proposed Development on BMV land **Chapter 12: Socio-Economic and Land Use** of the ES **[EN010154/APP/6.1]** sets out embedded mitigation measures including the use of panels at a height which could support sheep grazing, and capitalising on the opportunity to improve soil structure during the period of suspended agricultural activities during the operational phase of the Proposed Development. Furthermore, the **Framework SMP [EN010154/APP/7.10]** secured by Requirement 15 set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]** contains industry standard good practice mitigation measures to reduce impacts on soil which will ensure that the ALC grade will be unaltered through operation and decommissioning of the Proposed Development.

6.3.161 **Chapter 12: Socio-Economic and Land Use** of the ES **[EN010154/APP/6.1]** also considers the cumulative impact of the Proposed Development on agricultural land in combination with other developments including solar schemes in the area, using the county of Lincolnshire as the zone of influence.

The assessment concluded that no further mitigation measures are required hence the residual effect of the Proposed Development on agricultural land remains not significant.

Food Security

6.3.162 Food security is not considered in the energy NPSs but was a topic raised at Non-Statutory and Statutory Consultation. A report published by DEFRA, the UK Food Security Report 2024 discusses food security noting that *"It is plausible that with continued growth in output and conducive market conditions, that food production levels could be maintained or moderately increased alongside the land use change required to meet our Net Zero and Environment Act targets and commitments"* although future uncertainty is recognised. DEFRA also reported in Bioenergy Crops in England and the UK: 2008 – 2023 (published in June 2024) that 133,000 hectares of agricultural land in the UK were used to grow crops for bioenergy (this is a 9% increase on total area in 2020) which is 2.2% of the arable land in the UK.

6.3.163 DEFRA's Food Security Report also states that some agri-environmental schemes (AES) have led to land being taken out of food and other crop production to support long-term biodiversity and sustainable production, such as the Sustainable Farming Incentive (SFI). As of July 2024, around 250,000 hectares of land have been entered into SFI options that temporarily restrict food from being produced on that land, which the Food Security Report sets out is equivalent to around 3% of England's total utilised agricultural area (UAA) (9 million hectares).

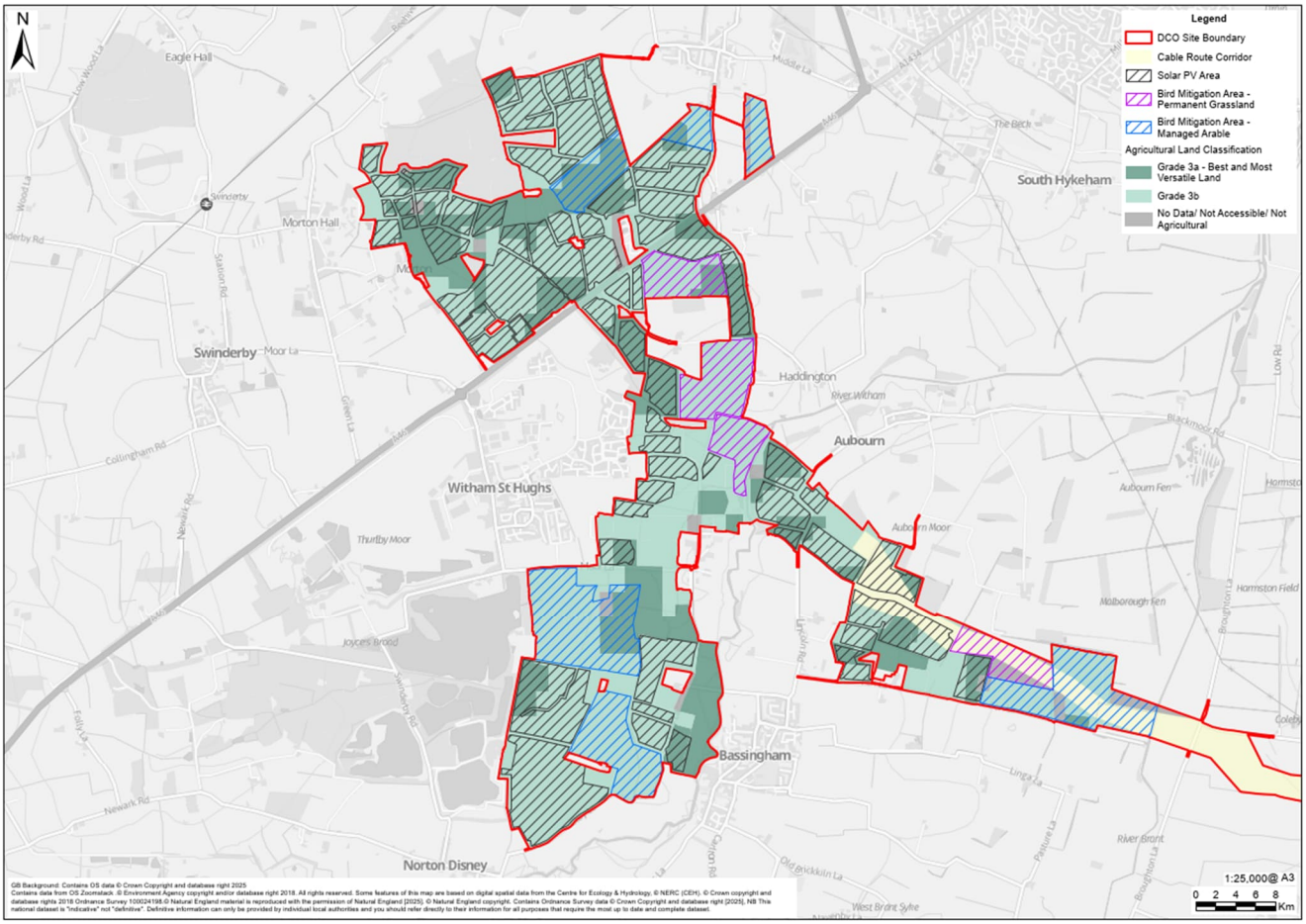
6.3.164 Solar Energy UK (FactSheet: Solar Farms and Agricultural Land 2024) sets out that currently solar farms occupy less than 0.1% of the UK's land. To meet the net zero target with 90GW of solar by 2050 (70GW by 2035), solar farms would at most account for approximately 0.6% of the UK land which is approximately 146,626 ha. This is almost half the land currently in the Sustainable Farming Incentive (SFI).

6.3.165 Paragraph 2.10.11 of NPS EN-3 states that *"solar and farming can be complementary, supporting each other financially, environmentally and through shared use of land, and encourages deployment of solar technology that delivers environmental benefits, with consideration for ongoing food production or environmental improvement".*

6.3.166 The Proposed Development allows for this shared use of land, in accordance with paragraph 2.10.11 of NPS EN-3, recognising the need to allow current farming practices to continue, as well as the critical national priority of solar generation. The Order Limits include areas of new grassland for bird mitigation and a significant portion of retained arable land (the Proposed Development commits to providing 181ha of retained arable land), which provides mitigation for ground nesting birds whilst also allowing current farming practices to continue. This retained arable land includes approximately 116ha of Subgrade 3a BMV land.

6.3.167 Plate 6-1 below shows this shared land use.

Plate 6-1 Order Limits shared uses of solar arrays, agricultural land, land retained for arable and bird mitigation



6.3.168 Notwithstanding the above, NPS EN-1, NPS EN-3 and the WMS is clear that whilst development on land on lower grade agricultural land is preferred, it is not prohibited in the context of planning policy and the shared use of the land supports the provision of paragraph 2.10.11 of NPS EN-3.

Public Rights of Way

6.3.169 Paragraph 5.11.30 of NPS EN-1 recognises that Public Rights of Way (PRoW), National Trails, and other rights of access to land are important recreational facilities and that the Secretary of State should expect application to consider opportunities for improving or creating new accesses. Paragraphs 2.10.40 to 2.10.45 of NPS EN-3 acknowledge that PRoW may be affected by developments, and during construction and operation applicants are encouraged to keep PRoW open. Paragraph 12.10.44 of NPS EN-3 also states that applicants should consider and maximise opportunities to facilitate enhancements to the public rights of way and include new opportunities public access (such as new PRoW or the creation of permissive paths), taking the views on landowners into account. Paragraph 12.10.45 of NPS EN-3 requires the submission of an outline Public Rights of Way Management Plan.

6.3.170 **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]** includes an assessment of PRoW. The visual impact on these receptors is considered in the Landscape and Visual Section, above whereas This chapter considers the traffic related impacts on the PRoWs. To summarise, the chapter concludes that there are no significant adverse impacts on PRoWs from a traffic and transport related perspective.

6.3.171 The Proposed Development has sought to enhance and improve connectivity as demonstrated in Design Principle 10 which states *"The Proposed Development will enhance, where possible, the existing connectivity within the network of PRoW through the provision of permissive paths and circular routes to be available for public use during the operation of the authorised development to improve accessibility".*

6.3.172 The **Design Approach Document [EN010154/APP/7.3]** demonstrates that that the design of the Proposed Development recognises and considers opportunities for increased connectivity, including measures to minimise disruption to PRoW during construction and operation and maintenance and decommissioning where practicable. Enhancement measures have also been explored which includes the addition of the following permissive paths to supplement the existing Public Right of Way network, link existing routes and create new and enhance existing connections to surrounding villages:

a. Route from Tunman Wood linking to PRoW LL/TOTH/11/1 to the east of Morton.

b. Route from Tunman Wood to Fosse Lane including a link to the Cathedral View Caravan Park linking with PRoW LL/TOTH/6A/1.

c. Cathedral View Caravan Park to Fosse Lane, providing a circular walk and safer route and access to Thorpe-on-the-Hill for residents.

d. East of Witham St Hughs, providing a circular walk around the proposed community orchard and linking to PRoW LL/AUbo/11/2.

e. Route south of Thurlby linking to PRoW LL/ThuN/2/1.

f. West of Bassingham providing a circular walk and linking to PRoW LL/NoDi/1/2.

6.3.173 The Proposed Development will minimise construction impacts by maintaining access to and along PRoW and the existing permissive paths or otherwise providing temporary or permanent PRoW and permissive path diversion routes where necessary to avoid any closures or potential conflicts with the Proposed Development where possible. The **Framework PRoW-MP [EN010154/APP/7.14]** sets out that diversion routes will be agreed with the local authorities prior to construction and contains further measures for PRoW and permissive path management.

6.3.174 The Proposed Development will minimise operational impacts by maintaining access to all existing PRoW within the Proposed Development, with suitable alternative routes provided for the three PRoW sections that will be permanently diverted (LL/TOTH/13/1 PRoW, LL/Aubo/10/1 PRoW and LL/ThuN/2/1 PRoW) and by controlling areas where the internal maintenance

route crosses any existing PRoW or local access roads (such as providing gates), permitting only operational traffic to utilise these internal routes within the Principal Site.

6.3.175 With regard to the impact of EMFs, section 14.8 of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** identifies that there are PRoW overlapping with the Order Limits, however it is concluded that the presence of the public either directly above or adjacent to underground cables associated with the Proposed Development would be transient, with the individuals using the PRoW exposed to EMFs from the cables for only very short periods of time. It is considered that the level of exposure to users of PRoW will be similar to that associated with general household appliances. Therefore, no significant adverse effects to users of PRoW are predicted to occur.

Summary

6.3.176 As demonstrated above, the Proposed Development has developed taking into account previously developed land, soil resources, contamination, green infrastructure, agricultural land and PRoW, and there are no significant effects in relation to these matters.

6.3.177 In relation to planning policy the use of BMV land requires justification in accordance with paragraphs 5.11.12 and 5.11.34 of NPS EN-1, the WMS and Policies 14 and 67 of the Central Lincolnshire Local Plan. Parts of the Principal Site and the Cable Corridor are located on BMV land although this is the lowest grade possible, subgrade 3a. The Site Selection Report as set out in **Appendix A: Site Selection Report** of this Planning Statement **[EN010154/APP/7.2]** demonstrates that a sequential approach has been taken in relation to BMV land, with the initial search being conducted with all BMV land excluded. Given a suitable site was not identified on this basis, BMV land was re-introduced. Whilst a suitable site was identified that included BMV land, the extent of BMV land included was kept to the minimum. During the design evolution process, the Design Principle related to agricultural land informed decision making.

6.3.178 The justification for inclusion of BMV land is to enable the Proposed Development to contribute to supporting net zero and the security of supply in addition to contributing to affordability and the reduction of costs for consumers. The substantial benefits of the Proposed Development are low carbon renewable energy generation, contribution to decarbonisation, ecological enhancements, provision of permissive paths, job creation and economic benefits, as set out in section 5.3 of this Planning Statement. Therefore, the inclusion of BMV land is justified, based on site selection, design evolution and the need and benefits of the Proposed Development.

6.3.179 The accordance of the Proposed Development with the NPS', relevant development plan policies, and prevention of any residual significant effects, results in a neutral weighting to the planning balance. From a planning perspective, the provision of permissive paths is a benefit of the Proposed

Development, see Section 5.3 of this Planning Statement, which has a positive weighting in the planning balance.

Noise and Vibration

6.3.180 Paragraph 5.12.1 of NPS EN-1 recognises that *"excessive noise can have wide ranging impacts"*, and it *"can also have an impact on the environment and the use and enjoyment of areas of value such as quiet places and areas with high landscape quality."* Paragraph 5.12.5 of NPS EN-1 identifies factors *"that will determine the likely noise impact of a proposed development"* including operational noise, the proximity to noise sensitive premises and areas and proximity to sites where noise may have an adverse impact on protected species or other wildlife. Paragraph 5.12.6 of NPS EN-1 sets out the factors that need to be considered in noise assessments.

6.3.181 **Chapter 11: Noise and Vibration** of the ES **[EN010154/APP/6.1]** provides an assessment of the noise and vibration impacts from construction, operation and decommissioning in accordance with paragraph 5.12.6 of NPS EN-1. **Chapter 11: Noise and Vibration** of the ES **[EN010154/APP/6.1]** concludes that there are no likely significant effects during construction with the exception of residual precautionary likely significant construction vibration effects identified at three residential receptors (R26 (Grange Cottage), R35 (Housham Grange) and R50 (19 Park Crescent)) during piling for solar structures. The effect is precautionary as calculations are based on percussive piling rigs from BS 5228-2 as vibration data for mini-piling rigs used for solar PV structures is not available. As such, construction vibration effects are likely to be overestimated. No likely significant effects are predicted for the operation and decommissioning stages.

6.3.182 Paragraph 5.12.8 of NPS EN-1 states that applicants *"should consider noise impacts of ancillary activities associated with the development, such as increased road and rail traffic movements or other forms of transportation".* Paragraphs 2.10.161 and 2.10.162 of NPS EN-3 set out considerations in relation to construction including noise and vibration from traffic and transport. **Chapter 11: Noise and Vibration** of the ES **[EN010154/APP/6.1]** includes an assessment of construction traffic. Changes in road traffic noise due to construction traffic are identified at worst as minor and not significant and therefore no adverse impacts on receptors are predicted. Appropriate routing of construction traffic on public roads and along access tracks will be implemented to avoid sensitive areas where practicable. This approach is set out in the **Framework CTMP [EN0101054/APP/7.18]** and secured by Requirement 14 set out in Schedule 2 of **the Draft Development Consent Order [EN0101054/APP/3.1]**.

6.3.183 Paragraph 5.12.15 of NPS EN-1 states projects should "*demonstrate good design through selection of the quietest or most acceptable cost-effective plant available; containment of noise within buildings wherever possible*". It also suggests the *"optimisation of plant layout to minimise noise emissions; and, where possible, the use of landscaping, bunds or noise barriers to reduce noise transmission".* Paragraph 4.7.3 of NPS EN-1 states, *"in terms of siting and use of appropriate technologies, can help mitigate adverse impacts such*

as noise" and paragraph 2.5.2 of NPS EN-3 adds *"the design of the project to mitigate impacts such as noise".*

6.3.184 The design of the Proposed Development has responded sensitively to its proximity to residential dwellings, village settlements and the Cathedral View Holiday Park with regard to noise in accordance with Design Principle 3 *"The Proposed Development will respond sensitively to its proximity to residential dwellings, village settlements and caravan park with regard to visual impact, noise and lighting"*. This has included providing additional setbacks and buffers to the land south east of Thorpe on the Hill and Cathedral View Holiday Park as well as excluding individual residential properties from the site following the Non-Statutory Consultation. Following Statutory Consultation further refinements were made to the design including the removal panels from three areas, revised siting of distributed battery compounds and reduction in the site of the BESS compound. Further detail is set out in the **Design Approach Document [EN010154/APP/7.3]**. Other design commitments relevant to noise include a minimum buffer from the BESS of 200m (to residential receptors), a minimum buffer of 100m from the Proposed Development (to residential receptors) and at operation, achieving operational noise levels no greater than the noise predictions. Design commitments are set out in **Appendix A: Design Commitments** of the **Design Approach Document [EN010154/APP/7.3]**.

6.3.185 The Proposed Development includes further measures to limit noise and vibration set out in the **Framework CEMP [EN010154/APP/7.7]**, **Framework OEMP [EN010154/APP/7.8], Framework DEMP [EN010154/APP/7.9]** and **Framework CTMP [EN0101054/APP/7.18]**, to be secured in Requirements 12, 13, 14 and 20 and set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.

6.3.186 Paragraphs 5.12.13 to 5.12.16 of NPS EN-1 set out national planning policy requirements with respect to mitigation. Paragraph 5.12.13 of NPS EN-1 states that the Secretary of State *"should consider whether mitigation measures are needed for operational and construction noise over and above any which form part of the application"*. Paragraph 5.12.16 of the NPS EN-1 links other statutory requirements for noise and that due regard should be taken of the relevant sections of the Noise Policy Statement for England (NPSE), the NPPF and associated guidance.

6.3.187 The NPSE (Ref. 22) promotes the management and control of noise to ensure significant adverse impacts are avoided on health and quality of life. It cites the importance of mitigating and minimising adverse impacts on health and quality of life. It sets out three aims in relation to noise which are to: *"avoid significant adverse impacts"* and *"mitigate and minimise adverse impacts"* on health and quality of life; and where possible to improve health and quality of life through the *"effective management"* of noise. The NPSE is clear that significant adverse effects on health and quality of life should be avoided. In applying the hierarchy approach to considering potential impacts upon noise, the NPSE sets out definitions for significant adverse effects and adverse effects. This is described as:

a. *Lowest Observed Adverse Effect Level (LOAEL) – this is the level above which adverse effects on health and quality of life can be detected; and*

b. *Significant Observed Adverse Effect Level (SOAEL) – this is the level above which significant adverse effects on health and quality of life occur.*

6.3.188 The NPSE outlines in paragraph 2.24 that *"where the impact lies somewhere between LOAEL and SOAEL. It requires that all reasonable steps should be taken to mitigate and minimise adverse effects on health and quality of life".*

6.3.189 Paragraph 5.12.17 of NPS EN-1 states that the Secretary of State *"should not be granted unless development proposals meet with 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."*

6.3.190 Paragraph 187(e) of the NPPF states that planning policies and decisions should contribute to and enhance the natural and local environment by *"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.*" Paragraph 198(a) of the NPPF also requires new development to 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.

6.3.191 Policies S14 (Renewable Energy) and S53 (Design and Amenity) of the Central Lincolnshire Local Plan are also relevant. Policy S14 sets out that noise impacts should be acceptable *"The impacts are acceptable on the amenity of sensitive neighbouring uses (including local residents) by virtue of matters such as noise"*. Policy S53 relates to achieving high quality and sustainable design which states development proposals should *"not result in adverse noise and vibration taking into account surrounding uses"*.

6.3.192 The Proposed Development has been designed following the mitigation hierarchy, as far as practicable, to avoid or reduce noise and vibration impacts and effects. With the implementation of design measures, along with other control measures noted above, potential significant adverse effects for noise during construction and noise and vibration during operation and decommissioning can be avoided.

6.3.193 The construction noise assessment set out in the **Chapter 11: Noise and Vibration** of the ES **[EN010154/APP/6.1]** concludes that significant noise effects are predicted at one residential receptor (R35) where there is potential for temporary exceedances of the SOAEL. This is considered to be a precautionary significant effect as construction noise assumptions are conservative and likely to over-estimate noise levels. However, to ensure that no exceedances of the SOAEL would occur, additional mitigation measures in the form of temporary, mobile acoustic screening would be implemented, as

set out in the **Framework CEMP [EN010154/APP/7.7]** and secured under Requirement 12 set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. Assuming the implementation of this screening and subsequent reduction in noise at R35 by at least 5dB, the noise effect would be reduced below the SOAEL (Above or equal to LOAEL and below SOAEL) and therefore no significant adverse impacts are predicted.

6.3.194 **Chapter 11: Noise and Vibration** of the ES **[EN010154/APP/6.1]** also sets out that at nineteen receptors the noise impacts would be below the LOAEL and at twenty-seven receptors the noise impacts would be above or equal to LOAEL and below SOAEL and therefore noise would be perceptible. A communication strategy, which will be secured through the DCO as part of the **Framework CEMP [EN010154/APP/7.7]** submitted alongside the DCO, will ensure that occupants of affected properties will be notified of the timings and duration of works which will be short in duration and localised. In addition, a Community Liaison Group (CLG) has been set up act as a point of contact for communities during the construction stage. Requirement 5 set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]** provides the framework for establishing the CLG and its duration. With mitigation in place, no significant adverse impacts on these receptors are predicted.

6.3.195 The construction vibration assessment concludes that significant residual vibration effects are predicted at three receptors (R26, R35 and R50) where there is potential for temporary exceedances of the SOAEL. These properties may experience temporary exceedances of the SOAEL if driven piling is undertaken at a distance of 60m or closer. This is considered to be a precautionary approach to construction vibration and likely to over-estimate vibration levels. However, if driven piling is to be undertaken, a commitment is included in the **Framework CEMP [EN010154/APP/7.7]** to undertake a construction vibration risk assessment such that significant effects would be avoided. If it is unavoidable that the SOAEL would be exceeded, the risk assessment would focus on limiting the exposure of nearby receptors to levels of vibration exceeding the SOAEL as far as reasonably practicable. No other significant adverse vibration effects are predicted to occur at the remaining receptors.

6.3.196 For the operational noise assessment, plant are assumed to operate continuously so there will not be any noticeable impulsive or intermittent characteristics from plant noise emissions experienced at the surrounding receptors. Transformers can have tonal features, although noise emissions from central inverters will be dominated by the cooling fans such that any tonal features of the transformers will not be noticeable. This equipment is therefore not considered further in the assessment. Requirement 16 set out in Schedule 2 of **the Draft Development Consent Order [EN010154/APP/3.1]** requires and sets out further measures in that "*No part of the authorised development may be operational until an operational noise assessment containing details of how the design of the authorised development for that part has incorporated mitigation to ensure that the operational noise rating levels set out in the environmental statement are to be complied with".* Secured under **the Draft**

Development Consent Order [EN010154/APP/3.1] this strengthens the commitment to minimise noise impacts.

6.3.197 As the night-time period provides the most onerous assessment criteria and operational noise is assumed to be consistent, the assessment considers night-time noise only. The operational noise assessment considers the centralised and distributed BESS options. Neither option would result in any exceedances of the SOAEL. As such, operational noise effects are identified as not significant. The LOAEL is exceeded at nine receptor locations for the consolidated BESS and twenty-one receptor locations for the distributed BESS and adverse levels of noise are identified.

6.3.198 No significant noise or vibration effects are identified during the decommissioning phase.

6.3.199 With the mitigation outlined above and detailed within the **Framework CEMP [EN010154/APP/7.7]**, the significant adverse vibration impacts during construction would be unlikely to occur and if they did would be temporary, short-term and minimised as far as reasonably practicable. It is therefore not considered that further mitigation is required.

Summary

6.3.200 NPS EN-1 requires that the impacts from noise and vibration are considered in the context of design and site layout. As demonstrated in the **Design Approach Document [EN010154/APP/7.3]**, and **Chapter 11: Noise and Vibration** of the ES **[EN010154/APP/6.1]** the design and layout of the Proposed Development that takes into account noise and vibration impacts.

6.3.201 NPS EN-1 requires significant adverse impacts on health and quality of life to be avoided and for adverse impacts to be mitigated and minimised to effectively manage and control noise to contribute to improved health and quality of life. This is also reflected in the NPSE, NPPF, and Policies S14 and S53 of the Central Lincolnshire Local Plan. Accordingly, the noise and vibration impacts arising from the Proposed Development identified in the assessment presented in **Chapter 11: Noise and Vibration** of the ES **[EN010154/APP/6.1]** are mitigated and managed to result in non-significant residual effects as a result of the embedded, and for construction additional, mitigation measures implemented. Should driven pilling be used during construction, vibration levels are predicted to exceed SOAEL and hence a construction vibration risk assessment is secured in the **Framework CEMP** of the ES **[EN010154/APP/7.7]**. The noise and vibration impacts from construction traffic are also assessed as required by NPS EN-3 and mitigation measures are provided in the **Framework CTMP [EN0101054/APP/7.18]** to minimise impacts.

6.3.202 In summary, the mitigation measures secured through Requirements 6 (detailed design), 12 (CEMP), 13 (OEMP), 14 (CTMP), 16 (operational noise), 20 (DEMP), and **Chapter 11: Noise and Vibration** of the ES **[EN010154/APP/6.1]**, confirms that no significant effects are anticipated in relation to noise and vibration from the Proposed Development, demonstrating

compliance with the relevant NPS EN-1, NPS EN-3, NPPF, NPSE, and local policies.

6.3.203 It is considered that noise and vibration should be afforded neutral weighting to the planning balance.

Socio-Economic Impacts

6.3.204 Paragraph 5.13.1 of NPS EN-1 sets out that *"the construction, operation and decommissioning of energy infrastructure may have socio-economic impacts at local and regional levels"* and paragraph 5.13.2 of NPS EN-1 states that *"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 at local or regional levels as part of the ES"*. **Chapter 12: Socio-Economic and Land Use** of the ES **[EN010154/APP/6.1]** sets out the assessment of the likely significant effects from Socio-Economics and Land Use as a result of the Proposed Development. This includes an assessment during construction, operation and decommissioning at both local and regional levels.

6.3.205 Paragraph 5.13.4 of NPS EN-1 sets out the scope of matters which the applicant's socio-economic assessment within the ES should consider including the creation of jobs and training opportunities, indirect beneficial impacts, effects on tourism and the impact of a changing influx of workers. Paragraph 5.13.5 of NPS EN-1 states that the applicant *"should describe how the developments socio-economic impacts correlate with local planning policies"*. Paragraph 2.10.69 of NPS EN-5 provides that applicants should set out what would be decommissioned and where *"there may be socio-economic benefits in retaining site infrastructure after the operational life, such as retaining pathways through the site or a site substation".*

6.3.206 Section 12.5 of **Chapter 12: Socio-Economic and Land Use** of the ES **[EN010154/APP/6.1]** provides a description of the existing and future baseline that form the basis of the assessment. Consideration to local policy is given at Section 12.2 of **Chapter 12: Socio-Economic and Land Use** of the ES **[EN010154/APP/6.1]**. The **Framework DEMP [EN010154/APP/6.1]** contains measures related to decommissioning the Proposed Development. Regarding legacy benefits, it is stated that the future of substations, including the Onsite Substation would be agreed with the relevant Local Planning Authority prior to decommissioning being undertaken, and areas of habitat and biodiversity mitigation and enhancement, as well as permissive paths delivered as part of the Proposed Development, would remain up until the land is returned to the previous landowners. Following this, the landowners would choose how the land is to be used and managed.

6.3.207 Paragraph 39 of the NPPF states that development should be secured *"that will improve the economic, social and environmental conditions of the area."* Local planning policies support sustainable economic growth; the achievement of healthy, inclusive and safe places; and the protection of existing and established land uses. Policy S14 (Renewable Energy) of the Central Lincolnshire Local Plan states that proposals for the development of

renewable energy will be supported where the impacts of development are made acceptable including on the amenity of sensitive neighbouring uses. Policy CL1 of the Bassingham Neighbourhood Plan sets out the importance of the protection of Locally Valued Key Facilities.

Employment

6.3.208 The construction period is expected to take approximately 24 to 30 months. During this period, it is estimated that the Proposed Development will support, on average, 394 total net jobs per annum. Of these, 177 jobs per annum will be expected to be taken-up by residents within a 60-minute travel time of the Proposed Development and by 217 by people residing outside this area (See Table 12-22 of **Chapter 12: Socio-Economic and Land Use** of the ES **[EN010154/APP/6.1]** for further detail).

6.3.209 **Chapter 12: Socio-Economic and Land Use** of the ES **[EN010154/APP/6.1]** sets out that to the direct employment generated by the construction of the Proposed Development, there will also be an increase in local employment arising from indirect and induced effects of the construction activity e.g. manufacturing services and suppliers to the construction process. Taking this into account, the impact of construction employment generation has been assessed as having a minor beneficial effect.

6.3.210 **Chapter 12: Socio-Economic and Land Use** of the ES **[EN010154/APP/6.1]** sets out that it is estimated that construction activity will contribute approximately £27.4 million to the national economy, of which approximately £12.3 million would likely be within the local area (see Table 12-23 of **Chapter 12: Socio-Economic and Land Use** of the ES **[EN010154/APP/6.1]** describes how this figure has been calculated based on the average GVA per construction worker in the East Midlands). The effect of Gross Value Added would also have a minor beneficial effect.

6.3.211 The estimated duration of the decommissioning period is expected to be less than or similar to that of the construction period; it is expected to take between 12 and 24 months and would be undertaken in phases. It is estimated that the number of jobs generated would be similar to the construction phase.

6.3.212 During the operational phase, the Proposed Development will generate long-term jobs. The Applicant has estimated that to operate and maintain the Proposed Development there will be a gross number of four permanent jobs generated. It is noted that there is expected to be two visiting workers per week and additional staff occasionally when the solar infrastructure needs replacing or cleaning, totalling up to 20 staff per day. As stated in **Chapter 12: Socio-Economic and Land Use** of the ES **[EN010154/APP/6.1]**, it is expected that when the rent revenues from the land start, then there will be additional jobs created on their farms offsite as landowners diversify their land further with the underlying financial stability of the rental income.

Local Accommodation Facilities

6.3.213 Analysis of the hotel, bed and breakfast and inns accommodation sector has been undertaken and reported in **Chapter 12: Socio-Economic and Land**

Use of the ES **[EN010154/APP/6.1]** to assess the likely capacity against the demand from the potential peak construction workforce. **Chapter 12: Socio-Economic and Land Use** of the ES **[EN010154/APP/6.1]** concludes that there would be no effect on the hotel, bed and breakfast, and inns accommodation sector arising from the Proposed Development. It is anticipated that accommodation providers would be able to accommodate employees working at the Proposed Development without any adverse effects on the sector.

Local Amenities

6.3.214 The potential changes to views during construction and operation could impact the amenity of visitor attractions and recreational facilities in the local area. The villages of Coleby, Bassingham, Navenby and Aubourn have been identified as having visitor and recreational attractions. **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** finds that views of construction activity will be visible from these villages at a distance however activity will be largely screened by vegetation. Overall, the Proposed Development is considered to have a negligible effect on the amenity of visitor attractions and recreational facilities.

6.3.215 The Proposed Development would require the long term closure and diversion of the following PRoW:

a. LL/Aubo/10/1 PRoW;

b. LL/TOTH/13/1 PRoW; and

c. LL/ThuN/2/1.

6.3.216 Given the large network of PRoWs, roads and existing permissive paths in the area that could be used as substitutes, the sensitivity of the PRoWs being assessed to be low and the short journey increases, the effects would be negligible.

6.3.217 A **Framework PRoW-MP [EN010154/APP/7.14]** has been prepared as part of the DCO application which details the mitigation measures which will be used to reduce the impacts of the Proposed Development on PRoW. The Proposed Development will also create a number of new permissive paths across the Principal Site resulting in a minor beneficial effect.

6.3.218 Paragraph 5.13.8 of NPS EN-1 sets out that the decision maker should consider "*The Secretary of State 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".*

6.3.219 Paragraph 5.13.9 of NPS EN-1 also sets out that Secretary of State should have regard to potential "*socio-economic impacts of new energy infrastructure identified by the applicant and from any other sources that the Secretary of State considers to be both relevant and important to its decision"*. Paragraph 5.13.11 requires the Secretary of State to consider relevant positive provisions the applicant has made or is proposing to make to mitigate impacts and any

legacy benefits that may arise. Measures to minimise socio-economic impacts will be contained within the **Framework CEMP [EN010154/APP/7.7]**, **Framework CTMP [EN010154/APP/7.18]**, **Framework PRoW-MP [EN010154/APP/7.14]**, **Framework Employment, Skills, and Supply Chain Plan [EN010154/APP/7.16]**, **Framework LEMP [EN010154/APP/7.15]**, **Framework OEMP [EN010154/APP/7.8]** and **Framework DEMP [EN010154/APP/7.9]** and secured by the relevant Requirements set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.

6.3.220 In response to Design Principles 1, 3 and 10 set out in the **Design Approach Document [EN010154/APP/7.3]**, the design development of the Proposed Development recognises the need for careful siting, design and mitigation through the development of a **Framework LEMP [EN010154/APP/7.15]**. The Proposed Development design includes suitable setbacks and buffers, such as screening and planting, in appropriate locations between solar infrastructure and residential dwellings, village settlements and the caravan park, in order to minimise harm to amenity through visual impact, noise and lighting.

6.3.221 Paragraph 5.13.12 of NPS EN-1 adds that an "*employment and skills plan detailing arrangements to promote local employment and skills development opportunities…*" may be included as a requirement if the Secretary of State wishes. The purpose of the **Framework Employment, Skills, and Supply Chain Plan [EN010154/APP/7.16]** is to maximise and pro-actively expand the economic benefits for the local community. The document identifies potential opportunities for activities relating to Skills, Supply Chain and Employment which the Applicant could take forward post consent. This is secured under Requirement 19 set out in Schedule 2 of the **Draft Development Consent Order [EN0101/54/APP/3.1]**. It is considered that the **Framework Employment, Skills, and Supply Chain Plan [EN010154/APP/7.16]** meets the requirements of paragraph 5.13.12 of NPS EN-1.

Summary

6.3.222 NPS EN-1 requires that the socio-economic impacts of the Proposed Development and the surrounding area are assessed within the ES at a local or regional level. NPS EN-5 adds the need to consider existing socio-economic conditions and compliance with local policy. There is a further requirement under NPS EN-1 to consider mitigation measures to offset adverse impacts, including through positive provisions. Paragraph 39 of the NPPF supports this detailing the applicant should seek to improve economic and social conditions.

6.3.223 The Proposed Development is considered to accord with all relevant policy having conducted a socio-economic assessment in accordance with NPS EN-1 and NPS EN-5, and minimised adverse impacts including through positive measures in compliance with NPS EN-1, the NPPF, and the relevant local policies. With mitigation measures in place, **Chapter 12: Socio-Economic and Land Use** of the ES **[EN010154/APP/6.1]** concludes there are negligible not significant effects for all phases of development in relation to Socio-Economics and land use.

6.3.224 **Chapter 12: Socio-Economic and Land Use** of the ES **[EN010154/APP/6.1]** identifies some minor beneficial effects in relation to employment and GVA during in construction and decommissioning. Note paragraph 5.13.10 of NPS EN-1 states *"limited weight is to be given to assertions of socio-economic impacts that are not supported by evidence"* in view of the need for energy infrastructure. The mitigations and benefits are provided through the **Framework CEMP [EN010154/APP/7.7]**, **Framework CTMP [EN010154/APP/7.18]**, **Framework PRoW-MP [EN010154/APP/7.14]**, **Framework Employment, Skills, and Supply Chain Plan [EN010154/APP/7.16]**, **Framework LEMP** [**EN010154/APP/7.15**], **Framework OEMP [EN010154/APP/7.8]**, and **Framework DEMP** [**EN010154/APP/7.9]**. As a result, it is considered that overall Socio-Economics and land use contributes a limited positive benefit to the planning balance.

Traffic and Transport

6.3.225 Paragraph 5.14.1 of NPS EN-1 recognises that *"the transport of materials, goods and personnel to and from a development during all project phases can have a variety of impacts on the surrounding transport infrastructure"*. Similarly, NPPF paragraph 109 also expects consideration and mitigation of transport impacts of development, including the environmental impacts and impacts on transport networks.

6.3.226 NPS EN-1 paragraph 5.14.5 states the ES should have a transport appraisal if a project is likely to have significant transport implications. **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]** provides an assessment of the impact of the Proposed Development on traffic and transport during the construction, operation, and decommissioning phases, including a transport appraisal.

6.3.227 Paragraph 5.14.6 of NPS states *"Applicants should consult with National Highways and Highways Authorities as appropriate on the assessment and mitigation to inform the application to be submitted"*. As the DCO Site surrounds the A46, a road on the strategic network, National Highways and Lincolnshire County Council have been consulted throughout the pre-application stage. Further detail of this is provided in the **Consultation Report [EN010154/APP/5.1]**.

6.3.228 Paragraph 5.14.7 of NPS EN-1 states *"The applicant should prepare a travel plan including demand management and monitoring measures to mitigate transport impacts"*. A Travel Plan is included within the **Framework CTMP [EN010154/APP/7.18]** in support of the Proposed Development. The **Framework CTMP [EN010154/APP/7.18]** is secured under Requirement 14 set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.

6.3.229 Paragraph 5.14.14 of NPS EN-1 sets out the Secretary of State *"may attach requirements to a consent where there is likely to be substantial HGV traffic"*. Section 13.6 of **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]** states there will be a daily peak of 25 LGVs and 50

HGVs associated with the Principal Site as well as 12 LGVs and 16 HGVs associated with the Cable Corridor works. Although the Proposed Development is located close to several villages/ settlements including Thorpe on the Hill, Haddington and Bassingham, only a small proportion of trips are expected to either originate from or pass through these villages during the construction, operation, or the decommissioning phases. Where practicable, the **Framework CTMP [EN010154/APP/7.18]** will restrict HGVs to routes which avoid these villages when travelling to and from the construction compounds as illustrated by the HGV routing plan shown in **Figure 13-4: Heavy Goods Vehicle Routing** of the ES **[EN010154/APP/6.2]**.

6.3.230 Paragraph 5.14.18 of NPS EN-1 states that *"A new energy NSIP may give rise to substantial impacts on the surrounding transport infrastructure and the Secretary of State should therefore ensure that the applicant has sought to mitigate these impacts, including during the construction phase of the development".*

6.3.231 Given the nature of the Proposed Development, the most significant impacts are anticipated to arise during the construction and decommissioning phases as set out in **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]**. This reflects paragraphs 2.10.161 and 162 of NPS EN-3 which states *"Once solar farms are in operation, traffic movements to and from the site are generally very light".*

6.3.232 During the EIA Scoping process, the Planning Inspectorate confirmed operational traffic could be scoped out of the assessment, subject to the provision of information regarding maintenance visits, consideration of the IEMA thresholds and any cumulative traffic effects. The Proposed Development is expected to attract a low level of vehicle trips during the operational phase, i.e. no more than 15 vehicle arrivals and 15 vehicle departures daily (30 two- way daily movements), therefore the operational traffic is not expected to result in a significant impact on the surrounding highway network.

6.3.233 As described in **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]** there are no residual significant effects of the Proposed Development found on any of the Traffic and Transport receptors during construction and decommissioning. All effects are minor or negligible significance. The mitigation measures that have been integrated into the design of the Proposed Development are set out in full in section 13.6 of **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]**.

6.3.234 Paragraph 5.14.21 of NPS EN-1 states that the Secretary of State *"should only consider refusing development on highways grounds if there would be an unacceptable impact on highway safety, residual cumulative impacts on the road network would be severe, or it does not show how consideration has been given to the provision of adequate active public or shared transport access and provision".* NPPF paragraph 116 reiterates this, stating that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe. **Chapter 13: Traffic and**

Transport of the ES **[EN010154/APP/6.1]** of ES states that there are no significant residual effects and no unacceptable impacts on highway safety.

6.3.235 Paragraph 2.10.35 to 2.10.39 of NPS EN-3 discusses accessibility considerations for renewable energy infrastructure. Paragraph 2.10.35 states that *"Applicants will need to consider the suitability of the access routes to the proposed site for both the construction and operation of the solar farm with the former likely to raise more issues".* Paragraph 2.10.36 of NPS EN-1 adds that *"access for the delivery of solar arrays and associated infrastructure during construction can be a significant consideration for solar farm siting".* **Appendix A: Site Selection Report** of this Planning Statement **[EN010154/APP/7.2]** explains how the location of the Proposed Development was selected. Appendix B of the Site Selection Report sets out that transport policy has used to assess the suitability for HGV access to the potential development zone from the primary and local road network, with consideration to minimising traffic impacts and the need for management. **Appendix A: Site Selection Report** of this Planning Statement **[EN010154/APP/7.2]** concluded that the site chosen for the Proposed development, in terms of transport, has suitable access from the strategic and local road network for construction traffic via the A46 and A15.

6.3.236 This is supported by Design Principle 7 of the **Design Approach Document [EN010154/APP/7.3]** which states "*The Proposed Development will provide safe accesses and minimise residual cumulative impacts on the road network as far as practical, whilst delivering the construction at a rapid pace to bring the project online as soon as practical. The main route of the A46 will be preferred. Additional emergency accesses to the site will also be provided where practicable.*" The **Design Approach Document [EN010154/APP/7.3]** demonstrates how the design evolved to include refinement to accesses and that the number of access points has been minimised as much as possible to reduce impacts on the local community, while still being compliant with guidance.

6.3.237 Paragraphs 2.10.120 to 2.10.126 of NPS EN-3 outline considerations for construction including traffic and transport noise and vibration And in Paragraph 2.10.123 of NPS EN-3 sets out that *"Applicants should assess the various potential routes to the site for delivery of materials and components where the source of the materials is known at the time of the application, and select the route that is the most appropriate."*

6.3.238 **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]** of ES assesses accessibility of the Principal Site. Statutory consultees, including Lincolnshire County Council, North Kesteven District Council and National Highways have advised on the suitability of roads to be proposed to be used (refer to Table 13-2 in **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]**). Subsequently, swept path analyses (see Annex C of the **Framework CTMP [EN010154/APP/7.18]**) were produced to confirm roads suitable for HGV use. It should be noted that other than for indivisible loads, HGVs will not use Principal Site accesses C-011 (Clay Lane (North West)) or C-012 (Clay Lane (North East)) owing to the unsuitability of the local

roads in the vicinity of these accesses to accommodate HGVs. Therefore, HGVs associated with these two access points will travel to Principal Site access C-008 (Moor Lane), where their loads will be transferred onto LGVs for onward delivery to Principal Site accesses C-011 (Clay Lane (North West)) and C-012 (Clay Lane (North East)). However, it is noted that 28 singular HGV deliveries will need to be made to Principal Site access C-011 (Clay Lane (North West)) to accommodate the delivery of transformers to this parcel throughout construction, as it will not be possible to transport these indivisible loads on smaller LGV loads. These HGV deliveries will be managed accordingly in order to limit their impact on this part of the network.

6.3.239 Paragraph 2.10.126 of NPS EN-3 sets out that *"Where a cumulative impact is likely because multiple energy infrastructure developments are proposing to use a common port and/or access route and pass through the same towns and villages, applicants should include a cumulative transport assessment as part of the ES"*. Paragraph 2.10.141 of NPS EN-3 adds *"Where cumulative effects on the local road network or residential amenity are predicted from multiple solar farm developments, it may be appropriate for applicants for various projects to work together",* cumulative effects related to transport and traffic are considered in **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]**, which confirms that during construction the cumulative effects expected on Traffic and Transport receptors is not significant.

6.3.240 The highways strategy agreed with Lincolnshire County Council has ultimately led to a strategy where the Proposed Development will not require any interventions on the local road network beyond the construction of accesses to facilitate the development, however existing field accesses will be widened to ensure the safe turning movements for construction vehicles.

Summary

6.3.241 NPS EN-1 and the NPPF require that development does not result in unacceptable impacts on highway safety and that applicants should seek to mitigate transport impacts on the surrounding environment. NPS EN-1 further suggests the preparation of a travel plan which secures measures to mitigate such impacts.

6.3.242 The Applicant has demonstrated accordance with this policy through the provision of a combined Travel Plan and **Framework CTMP [EN010154/APP/7.18],** which will be secured under Requirement 14 set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. Additionally, **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]** has assessed the impacts to traffic and transport from the Proposed Development including, in accordance with NPS EN-3 the suitability of access roads; active, public or shared transport access; cumulative traffic impacts; and opportunities to facilitate enhancements to PRoW. With the embedded mitigation measures in the **Framework CTMP [EN010154/APP/7.18]**, **Framework CEMP [EN010154/APP/7.7]**, **Framework PRoW-MP [EN010154/APP/7.14]**, and **Framework OEMP [EN010154/APP/7.8]**, there are no residual significant effects of the Proposed Development on any of the Traffic and Transport receptors. Note there are

slight adverse, or neutral (not significant) cumulative effects expected on Traffic and Transport receptors which refers to the construction phase of the Proposed Development only, and similar effects are expected in decommissioning. A significant beneficial impact is identified with regard to enhancements created through PRoW.

6.3.243 Further consideration of access roads, as required under NPS EN-3, is demonstrated through the site selection process detailed within **Appendix A: Site Selection Report** of this Planning Statement **[EN010154/APP/7.2]** and supported by the **Design Approach Document [EN010154/APP/7.3]** which integrate access and transport considerations into the design of the Proposed Development.

6.3.244 The Proposed Development demonstrates compliance with the relevant NPS, NPPF, and local policy; including, through the embedded mitigation measures secured through Requirements 6 (detailed design), 12 (CEMP), 13 (OEMP), 14 (CTMP), 18 (PRoW-MP) set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]** and **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]**, no residual significant adverse effects on traffic and transport as a result of the Proposed Development. Therefore, traffic and transport is given a neutral weighting in the planning balance.

Resource and Waste Management

6.3.245 Section 5.15 of NPS EN-1 sets out considerations with regard to resource and waste management. Paragraph 5.15.2 states that "*Sustainable waste management is implemented through the waste hierarchy, which sets out the priorities that must be applied when managing waste*".

6.3.246 Paragraph 5.15.14 NPS EN-1 states The Secretary of State *"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".*

6.3.247 Paragraph 5.15.15 of NPS EN-1 states that the Secretary of State should be satisfied that *"any such waste can be 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*", and that *"adequate steps have been taken to minimise the volume of waste arisings".*

6.3.248 Paragraph 8(c) of the NPPF focusses on the environmental objective of achieving sustainable development stating "*minimising waste and pollution*" as a measure to protect and enhance our natural, built and historic environment. Similarly, Policy S53 (Design and Amenity) of the Central Lincolnshire Local Plan states proposals will be expected to *"Minimise the need for resources both in construction and operation of buildings and be easily adaptable to avoid unnecessary waste"*.

6.3.249 Section 14.5 of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** sets out the arrangements that are proposed for managing any waste produced by the Proposed Development, in accordance

with the waste hierarchy. **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** concludes that there will be no significant adverse effects relating to materials and waste during construction, operation or decommissioning. In addition, the assessment of cumulative impacts, which considers other Solar PV schemes in Lincolnshire, concludes there to be no significant cumulative impacts under the realistic worst-case scenario, although they would be significant under the absolute worst case. The absolute worst-case is not realistic however due to commitments and regulatory controls on the identified cumulative projects. The Applicant is committed to properly managing all waste from the Proposed Development, including on-site and off-site, by dealing with it appropriately with the waste infrastructure available.

6.3.250 The construction of the Proposed Development will be subject to measures and procedures defined within the **Framework CEMP [EN010154/APP/7.7]**. The CEMP is secured under Requirement 12 set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]** and includes the implementation of industry standard practice and control measures for environmental impacts arising during construction, including the approach for materials and waste management on-site.

6.3.251 The operation of the Proposed Development will be subject to measures and procedures defined within the **Framework OEMP [EN010154/APP/7.8]** secured under Requirement 13 set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/6.1]**. The OEMP will include the implementation of industry standard practice and control measures for environmental impacts arising during operation, such as the approach for materials and waste management on-site.

6.3.252 The decommissioning of the Proposed Development will be subject to measures and procedures defined within the **Framework DEMP [EN010154/APP/7.9]** secured under Requirement 20 set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/6.1]**. These measures include the removal and recycling or disposal, in accordance with good practice measures, of all the infrastructure associated with the Proposed Development and paragraph 5.15.12 of NPS EN-1 which states *"Where possible, applicants are encouraged to source materials from recycled or reused sources and use low carbon materials, sustainable sources and local suppliers. Construction best practices should be used to ensure that material is reused or recycled onsite where possible*". This includes, all the PV panels, Onsite Substation, mounting structures, inverters, transformers, and BESS. Note the cabling and cable ducting in the Cable Corridor may remain in-situ, subject to government policy and best practice at the time of decommissioning. Additionally, areas of habitat and biodiversity mitigation and enhancement, as well as permissive paths delivered as part of the Proposed Development, would remain up until the land is returned to the previous landowners. Following this, the landowners would choose how the land is to be used and managed.

6.3.253 As set out in the **Framework DEMP [EN010154/APP/7.9]** the Applicant is committed to maximising recycling and reuse of the Proposed Development components at the end of their life. With the embedded mitigation measures in place, including the Applicant's commitment to reuse and recycle, and the overall quantities of decommissioning waste sent to landfill are anticipated to be below 1% of regional inert and non-hazardous landfill capacity and less than 0.1% of national hazardous landfill capacity.

Summary

6.3.254 The impacts of the Proposed Development in relation to materials and waste will be appropriately controlled through management plans including applying the waste hierarchy and commitment to recycling, secured via Requirements set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. This is through preparation of a CEMP (Requirement 12), OEMP (Requirement 13) and the DEMP (Requirement 20).

6.3.255 The Proposed Development is in accordance with NPS EN-1 and the Central Lincolnshire Local Plan regarding materials and waste and is afforded neutral weight in the planning balance.

Water Quality and Resources

6.3.256 Paragraph 5.16.1 of NPS EN-1 states that *"Infrastructure development can have adverse effects on the water environment, including groundwater, inland surface water, transitional waters, coastal and marine waters* and "*can have adverse effects on the water environment and that during construction, operation and decommissioning development can lead to an increased demand for water and cause adverse ecological effects resulting from physical modifications to the water environment"* (paragraph 5.16.2). Accordingly, paragraph 5.16.3 of NPS EN-1 requires applicants to undertake an assessment of the impact of projects on the water environment. Paragraph 2.10.154 of NPS EN-3 acknowledges the role of water management in the design of solar projects, noting that *"Where previous management of the site has involved intensive agricultural practice, solar sites can deliver significant ecosystem services value in the form of drainage, flood attenuation, natural wetland habitat, and water quality management."*

6.3.257 Paragraph 187(e) of the NPPF states that planning decisions should "C*ontribute to and enhance the natural and local environment by…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*."

6.3.258 As described in Section 3.2 of this Planning Statement, the River Witham and the River Brant intersect the Proposed Development.

6.3.259 **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]** assesses all potential effects of the Proposed Development upon water bodies which concludes that no significant adverse effects are predicted, following the incorporation of the standard and embedded measures described in section 9.6 of **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]**.

Measures to address impacts to the water environment during construction are set out in the **Framework CEMP [EN010154/APP/7.7]** including trenchless crossings of the River Witham and River Brant using a horizontal directional drill technique. The **Framework CEMP [EN010154/APP/7.7]** sets out that a Water Management Plan (to be produced post-consent) will set out details of water quality monitoring to be undertaken during construction. Furthermore, the **Framework DEMP [EN010154/APP/7.9]** also includes measures to prevent pollution and flooding during the decommissioning phase. Paragraph 5.16.9 of NPS EN-1 sets out that *"the risks on the water environment can be reduced through careful design to facilitate adherence to good pollution control practice".*

6.3.260 Paragraph 5.16.12 of NPS EN-1 states that the *"Secretary of State will 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 Environment (Water Framework Directive) (England and Wales) Regulations 2017"*. Paragraph 5.16.14 of NPS EN-1 further states that the Secretary of State should be satisfied that proposals have had regard to the River Basin Management Plans (RBMP) and the requirements of the Water Framework Directive.

6.3.261 In addition to national policy, there is local planning policy of relevance that also seeks to protect water quality in line with the Water Framework Directive. Specifically, Policy S21 (Flood Risk and Water Resources) of the Central Lincolnshire Local Plan sets out that development should protect, enhance and restore watercourses, ponds, lakes and water dependant habitats where possible. Developments should also set out that development, where appropriate, should incorporate Sustainable Urban Drainage Systems (SuDS) and take an integrated approach to water management, in accordance with the surface water hierarchy.

6.3.262 **Appendix 9-B: Water Framework Directive (WFD) Assessment** of the ES **[EN010154/APP/6.3]** presents the WFD Assessment for the Proposed Development. The assessment demonstrates that the Proposed Development is compliant with the objectives of the WFD as it would not cause deterioration in the status of the water bodies and would not prevent the water bodies achieving Good Ecological Status and Good Ecological Potential. Some local impacts to aquatic habitat networks are unavoidable during the construction and operation phase, but impacts would be minimised as a result of the mitigation measures set out in the **Framework CEMP [EN010154/APP/7.7]** and **Framework OEMP [EN010154/APP/7.8]**. **Appendix 9-B: Water Framework Directive Assessment** of the ES **[EN010154/APP/6.3]** also demonstrates how the relevant RBMP was considered in the WFD assessment. The WFD status and objectives from the appropriate RBMP were incorporated into the desk study in order to understand the baseline conditions. Furthermore, **Appendix 9-B: Water Framework Directive (WFD) Assessment** of the ES **[EN010154/APP/6.3]** confirms that the Proposed Development would not prevent the achievement of the wider WFD objectives in the Anglian RBMP or Humber RBMP and is not predicted to have an impact

on any other water body within the Humber or Anglian river basin district or mitigation measures developed to achieve Good status.

6.3.263 A Framework Surface Water Drainage Strategy (**Appendix 9-D: Framework Surface Water Drainage Strategy** of the ES **[EN010154/APP/6.3]**) has been developed to ensure the risk of surface water flooding is not increased as a result of the Proposed Development and any increased land take for foundations and any access roads. Careful consideration of the SuDS features, in accordance with local planning policy and through liaison with the LLFA, the IDB, and Environment Agency, has been undertaken to ensure that the Surface Water Drainage Strategy adequately attenuates and treats runoff from the Proposed Development, whilst not increasing flood risk to the site and surrounding areas.

Summary

6.3.264 In accordance with the requirements of NPS EN-1 paragraph 5.16.12, the WFD assessment demonstrates that the Proposed Development is compliant with the objectives of the WFD, it would not cause deterioration in status of the water bodies and would not prevent the water bodies achieving Good Ecological Status and Good Ecological Potential.

6.3.265 Additionally, no significant adverse effects have been identified, following the incorporation of the measures secured via Requirements 10 (surface and foul water drainage), 12 (CEMP), 13 (OEMP) and 20 (DEMP) set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. The Proposed Development is therefore considered to be in compliance with EN-1, EN-3, NPPF, and with the relevant local planning policy, as set out above. The planning weight accorded to water quality is neutral.

6.3.266 It is considered that the results of the assessment of water environment affects included in **Chapter 9 Water Environment** of the ES **[EN010154/APP/6.1]** accords with the NPPF in regard to water environment impacts.

6.3.267 In conclusion, with the implementation of mitigation measures, no adverse effects on the water environment are anticipated to occur during the lifetime of the Proposed Development and therefore can be afforded neutral weight in the planning balance.

6.4 Minerals Safeguarding

6.4.1 The Proposed Development is partially located within a Mineral Safeguarding Area (MSA) for sand and gravel and limestone, as shown on Figure 1 of Appendix **12-C Minerals Assessment Report** of the ES **[EN010154/APP/6.3]** and lies in proximity to sand and gravel minerals sites at Whisby Quarry, Swinderby Airfield and Norton Bottoms Quarry. The Lincolnshire Minerals and Waste Local Plan provides relevant policies in respect of minerals and comprises the following:

a. Core Strategy and Development Management Policies Plan (June 2016); and

b. Site Locations (December 2017).

6.4.2 Lincolnshire County Council is currently reviewing the Lincolnshire Minerals and Waste Local Plan and has published the Draft Lincolnshire Minerals and Waste Local Plan: Regulation 18 – Preferred Approach (July 2024) (Ref 15). Consultation ended on the Draft Plan in September 2024.

6.4.3 Policy M11 of the Lincolnshire Minerals and Waste Local Plan Core Strategy and Development Management Policies requires applications for non-minerals development in a Mineral Safeguarding Area (MSA) to be accompanied by a Minerals Assessment, adding that permission will be granted for development provided that it would not sterilise mineral resources within the MSA or prevent future extraction on neighbouring land.

6.4.4 Policy M12 of the Lincolnshire Minerals and Waste Local Plan Core Strategy and Development Management Policies seeks to safeguard existing mineral sites and associated minerals infrastructure. It states that mineral sites and associated infrastructure that supports the supply of minerals in the County will be safeguarded against development that would unnecessarily sterilise the sites and infrastructure or prejudice or jeopardise their use by creating incompatible land uses nearby.

6.4.5 **Appendix 12-C: Minerals Safeguarding Assessment** of the ES **[EN010154/APP/6.1]** concludes that given the reversible nature of the Proposed Development, there will be no permanent sterilisation of the mineral resource, and the ability of future generations to extract the resource over the long term will not be compromised. Furthermore, given the large landbank of sand and gravel and limestone in Lincolnshire, the Proposed Development will not inhibit extraction within the timescale that the mineral is likely to be needed and will ultimately have a negligible impact on sterilising the mineral resource.

6.4.6 There are a number of locations where the thickness of the mineral is negligible or limited where extraction would not be economical. The land take for the Grid Connection Cable is small, and thus the area of potential sterilisation would be negligible.

Summary

6.4.7 Based on the findings from **Appendix 12-C: Minerals Safeguarding Assessment** of the ES **[EN010154/APP/6.1]** it is considered that the Proposed Development satisfies Policies M11 and M12,of the Lincolnshire Minerals and Waste Local Plan, and is afforded neutral weight in the planning balance.

6.5 Glint and Glare

6.5.1 Paragraph 2.10.27 of NPS EN-3 states that *"The two main impact issues that determine distances to sensitive receptors are therefore likely to be visual amenity and glint and glare"*. The potential for significant effects from glint and glare associated with the Proposed Development is assessed in Section 14.3 of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]**. This is supplemented by a dedicated **Glint and Glare Assessment**, provided

in **Appendix 14-D: Glint and Glare Assessment Report** of the ES **[EN010154/APP/6.3]**.

6.5.2 As stated in **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]**, the definition of glint and glare for the purposes of this assessment is the effect of reflected sunlight causing harm or discomfort to a sensitive receptor. A glint is further defined as the momentary receipt of a bright light and a glare as the receipt of a bright light over an extended or continuous period of time.

6.5.3 In accordance with paragraph 2.10.103 of NPS EN-3, applicants are expected to undertake a qualitative mapping of receptors to identify potential glint and glare issues and determine the need for a formal assessment. Paragraph 2.10.104 further notes that where a quantitative assessment is required, it should include an evaluation of the potential for impact and impairment based on the angle, duration, and intensity of sunlight reflections.

6.5.4 Paragraph 2.10.105 of NPS EN-3 explains that the scope of reflectivity analysis will depend on the specific characteristics of the site and project design. Additionally, paragraph 2.10.106 of NPS EN-3 states that *"When a glint and glare assessment is undertaken, the potential for solar PV panels, frames and supports to have a combined reflective quality may need to be assessed, although the glint and glare of the frames and supports is likely to be significantly less than the panels".*

6.5.5 Paragraph 2.10.105 of NPS EN-3 states *"The extent of reflectivity analysis required to assess potential impacts will depend on the specific project site and design. This may need to account for 'tracking' panels if they are proposed as these may cause differential diurnal and/or seasonal impacts".* In the case of the Proposed Development, the assessment accounts for the specific panel types proposed, either fixed south-facing or single-axis tracker systems, as described in **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]**. The fixed south facing solar PV panels would be oriented in a southwards direction at an angle of between 5 and 45 degrees to maximise solar gain and will remain in a fixed position throughout the day and during the year (i.e. they will not rotate to track the movement of the sun). The single axis tracker panels will rotate from east to west (+/-60 degrees from horizontal) to track the movement of the sun throughout the day.

6.5.6 Paragraph 2.10.158 of NPS EN-3 sets out *"Solar PV panels are designed to absorb, not reflect, irradiation. However, the Secretary of State should assess the potential impact of glint and glare on nearby homes, motorists, public rights of way, and aviation infrastructure (including aircraft departure and arrival flight paths)".*. Paragraph 2.10.159 of NPS EN-3 adds that *"there is no evidence that glint and glare from solar farms results in significant impairment on aircraft safety. Therefore, unless a significant impairment can be demonstrated, the Secretary of State is unlikely to give any more than limited weight to claims of aviation interference because of glint and glare from solar farms".*

6.5.7 In accordance with Section 5.5 of NPS EN-1 and paragraph 2.10.158 of NPS EN-3, the assessment on glint and glare set out in **Chapter 14: Other**

Environmental Topics of the ES **[EN010154/APP/6.1]** was conducted for ground-based receptors, including residential receptors, roads, waterways and railways, and PRoW within 1km of the DCO Site; and aviation receptors within 30km, with detailed assessment for international aerodromes within 20km, military aerodromes within 10km and 5km for small aerodromes. The assessment concluded no significant effects for all receptors assessed.

6.5.8 The design of the Proposed Development incorporates embedded mitigation measures to address glint and glare impacts, alongside landscape and visual considerations. These measures are described in **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** and are incorporated within the **Framework LEMP [EN010154/APP/7.15]** submitted with the DCO application. The embedded mitigation measures include:

a. Careful siting of the Proposed Development in the landscape with offsets from existing residential areas, vegetation patterns, and road networks;

b. Conserving existing vegetation patterns; and

c. Creating new green infrastructure (i.e., vegetation planting) within the Principal Site with extensive planting proposals.

Summary

6.5.9 With the proposed embedded design mitigation within the **Framework LEMP [EN010154/APP/7.15]** secured through Requirement 8 set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**, no significant residual effects are anticipated as a result of the Proposed Development. Based on these findings, the Proposed Development is considered to be in accordance with national policy with respect to glint and glare, resulting in a neutral weighting in the planning balance.

6.6 Cumulative Impacts

6.6.1 Paragraph 4.1.5 of NPS EN-1 states that in weighing impacts and benefits of a proposed development, the Secretary of State should take into account:

- *"its potential benefits including its contribution to meeting the need for energy infrastructure, job creation, reduction of geographical disparities, environmental enhancements, and any long-term wider benefits an*
- *its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy".*

6.6.2 Paragraph 4.2.12 of NPS EN-1 outlines "*The cumulative impacts of multiple developments with residual impacts should also be considered."*

6.6.3 Paragraph 4.3.3 of NPS EN-1 requires an assessment "*of the likely significant effects of the proposed project on the environment, covering the direct effects and any indirect, secondary, cumulative, transboundary, short, medium, and long-term, permanent and temporary, positive and negative effects at all*

stages of the project, and also of the measures envisaged for avoiding or mitigating significant adverse."

6.6.4 Paragraph 2.10.26 of NPS EN-3 states that *"applicants should consider the cumulative impacts of situating a solar farm in proximity to other energy generating stations and infrastructure."* The site selection process is set out in the **Appendix A: Site Selection Report** of the Planning Statement **[EN010154/APP/7.2]**.

6.6.5 Section 5 of NPS EN-1 sets out the generic impacts of energy proposals upon the environment for energy infrastructure, where cumulative effects are to be considered. NPS EN-5 reiterates the policy positions of NPS EN-1 and NPS EN-3, confirming the need to consider cumulative impacts within the ES and this being an overall consideration as part of the planning balance exercise.

6.6.6 **Chapter 15 Cumulative Effects and Interactions** of the ES **[EN010154/APP/6.1]** addresses the potential for cumulative effects and effect interactions as a result of the Proposed Development. The assessment of Effect Interactions considers the potential for several direct or indirect effects arising from different aspects of the Proposed Development to give rise to a combined effect on a single receptor. Table 15-2 in **Chapter 15 Cumulative Effects and Interactions** of the ES **[EN010154/APP/6.1]** summarises the potential effect of interactions during the construction and decommissioning phases of the Proposed Development.

6.6.7 Within the majority of technical chapters, no likely significant effects have been identified through the cumulative effects assessment where they were not already predicted for the Proposed Development in isolation.

6.6.8 Paragraph 2.10.157 of EN-3 states the visual impacts and impacts upon landscape character should be considered together with the possible cumulative effect with any existing or Proposed Development.

6.6.9 Some significant adverse cumulative effects are identified in **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]**, however the significance of effect attributed to the Proposed Development is not increased when considering these other developments alongside the Proposed Development. Therefore, there are not any additional likely significant effects associated with cumulative effects that are not already accounted for by the assessment of the Proposed Development. The mitigation measures described previously, founded on the landscape focussed Design Principles outlined in the **Design Approach Document [EN010154/APP/7.3]** aligns with paragraph 2.10.95 of NPS EN-3 that *"it should be noted that with effective screening and appropriate land topography, the area of a zone of visual influence could be appropriately minimised".*

6.6.10 For the assessment of cumulative landscape and visual amenity effects, Section 10.10 of **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** outlines there is potential for significant cumulative landscape and visual effects during both construction, operation and decommissioning, as is the case for the Proposed Development alone.

6.6.11 As reported in **Chapter 10: Landscape and Visual Amenity [EN010154/APP/6.1],** the following significant cumulative effects are anticipated for landscape and visual receptors, where the magnitude of effect is higher than that of the Proposed Development in isolation. During construction:

a. **Major Adverse (significant)** landscape Cumulative Effects on the North Kesteven District landscape sub-area Witham and Brant Vales due to the noticeable increase in extent over which changes to the landscape character would be perceived during construction. Additionally, changes are anticipated to the visual amenity of users of the Viking Way (PRoW Cole/2/1 and BooG/2/2) as a result of the Proposed Development together with ID95 Application Reference: PL/0087/23, North Hykeham Relief Road, resulting in a **Major adverse** effect which is significant.

b. **Moderate Adverse (significant)** landscape Cumulative Effects on the North Kesteven landscape sub-area Limestone Heath due to the noticeable increase in extent over which changes to the landscape character would be perceived during construction as a result of the Proposed Development together with ID63 Application Reference: EN010149, Springwell Energy Farm and ID103 Application Reference: EN0110016, Leoda Solar Farm, resulting in a **Moderate adverse** effect which is significant.

6.6.12 During operation (year 15) it is considered there would be no notable difference between the landscape and visual effects of the Proposed Development, and the cumulative landscape and visual effects of the Proposed Development.

6.6.13 Although not possible to know at this stage, the effects of decommissioning of the Proposed Development are likely to be like the effects experienced during construction, albeit with the benefit of established perimeter planting.

6.6.14 Whilst there are potential effects for the landscape, from a cumulative perspective there may be the potential for beneficial cumulative effects associated with biodiversity net gain across Lincolnshire, due to the number of solar projects in the county which are required to commit to at least 10% BNG from May 2026 (under Section 98 and 99 of the Environment Act 2021.

Summary

6.6.15 It is acknowledged there are likely residual cumulative adverse effects in terms of landscape and visual amenity as a result of the Proposed Development. As set out in paragraph 4.2.16 of NPS EN-1 after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. The substantial public benefits of the Proposed Development, described within this Planning Statement, including the delivery of CNP infrastructure outweighs the harm.

7. Process of Determination and Planning Balance

7.1 Introduction

7.1.1 The determination of this DCO application will be made in accordance with s104 of the PA 2008.

7.2 Section 104(2) to 104(8) of the PA 2008

7.2.1 S104(2) of the PA 2008 states that in deciding an application for development consent the Secretary of State must have regard to:

a. *Any relevant NPS;* The relevant NPSs for this application are NPS EN-1, NPS EN-3 and NPS EN-5.

b. *The appropriate marine policy documents;* marine policy documents are not applicable to this application.

c. *Local impact reports*; Local Impact Reports are expected to be prepared by the host authorities (North Kesteven District Council and Lincolnshire County Council) and submitted into the Examination at the appropriate time.

d. *Prescribed matters*; it has been demonstrated that a decision to grant a DCO for the Proposed Development would have regard to those matters prescribed by Regulation 3 (as detailed in this Planning Statement and **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1])** and Regulation 7 (as detailed in this Planning Statement and **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]**) of the Infrastructure Planning (Decisions) Regulations 2010 (as amended).

e. *Any other matters which the Secretary of State thinks are both important and relevant to the Secretary of State's decision*; whilst the Development Plan does not provide the decision making framework for a DCO application, the policies contained within the applicable Development Plan documents are likely to be both important and relevant.

7.2.2 S104(3) of the PA 2008 Act states that "*applications for development consent must be decided by the Secretary of State in accordance with any relevant NPS except to the extent that one or more of subsections 104(4) to 104(8) apply*."

7.2.3 There are no specific or relevant policies set out within NPS EN-1, NPS EN-3 or NPS EN-5 which indicate that consent should be refused. The Proposed Development is compliant with the policies in the relevant NPS.

7.2.4 Further to this, there are no exceptions in s104(4) to (8) that apply to the Proposed Development to decision making by the Secretary of State.

7.2.5 S104(4) applies if "*deciding an application in accordance with any relevant national policy would lead to the UK being in breach of any of its international*

obligations." There is no evidence that the granting of the DCO for the Proposed Development would lead to the UK being in breach of any its international obligations.

7.2.6 S104(5) applies if "*deciding an application in accordance with any relevant national policy would lead to the Secretary of State being in breach of any duty imposed on the Secretary of State by or under any enactment."* There is no evidence that the granting of the DCO for the Proposed Development would lead the Secretary of State to be in breach of any such duty.

7.2.7 S104(6) applies if "*deciding an application in accordance with any relevant national policy would be unlawful by virtue of any enactment*". There is no evidence that the granting of the DCO for the Proposed Development would be unlawful by virtue of any enactment.

7.2.8 S104(7) applies if *"the adverse impact of a proposed development would outweigh its benefits"*. This Planning Statement sets out how the adverse impacts relating to heritage, landscape and loss of agricultural land are outweighed by the substantial benefits of the Proposed Development which include low carbon energy generation, contribution to decarbonisation, ecological enhancements, the provision of permissive paths, employment generation and economic growth, and are set out in Section 5.3 of this Planning Statement. This confirms that s104(7) of the PA 2008 Act is not engaged.

7.2.9 S104(8) applies "*if any condition prescribed for deciding an application otherwise than in accordance with an NPS is met"*. There is no evidence that any condition is met in relation to the Proposed Development.

7.2.10 None of the limited exceptions in s104(4)-(8) of the PA 2008 apply with the focus for decision making with respect to the Proposed Development requiring the application of the planning balancing exercise pursuant to s104(2) and (3) of the PA 2008 Act. This is set out below.

7.3 Planning Balance

7.3.1 Whilst NPS EN-1 applies the presumption in favour of granting development consent for CNP infrastructure, it is still necessary to apply the planning balancing exercise to determine whether any specific policy tests indicate that consent should be refused, with the need to weigh adverse impacts against benefits overall.

7.3.2 Paragraph 4.1.5 of NPS EN-1 sets out how the Secretary of State, when making a decision, will weigh *"adverse impacts against its benefits".*

7.3.3 The NPS EN-1 glossary sets out that the hierarchy of weight is defined as 1) limited 2) moderate 3) great 4) significant 5) substantial.

7.3.4 The following paragraphs summarise the outcomes of the planning appraisal in Section 6 of this Planning Statement, applying the hierarchy of weight.

Positive impacts

7.3.5 The Proposed Development would make a significant contribution to the urgent need for low carbon renewable electricity generation established in NPS EN-1 and which has become more urgent following the coming into force of the legally binding target of Net Zero by 2050. Over the lifetime of the project, the Proposed Development would result in negative GHG emissions contributing to meeting the UK's carbon commitment. Accordingly low carbon renewable electricity generation, which contributes towards energy security and energy affordability, is afforded substantial positive weight in favour of the Proposed Development.

7.3.6 As an NSIP requiring consent via a DCO, the Proposed Development is not currently subject to mandatory BNG requirements. However, given the importance of, and opportunities to deliver biodiversity net gain within the Order Limits, the Proposed Development has sought to deliver ecological enhancements. The Proposed Development will deliver a minimum of 30% biodiversity net gain in habitat units, 50% biodiversity net gain in hedgerow units and 10% biodiversity net gain in watercourse units. Accordingly, ecological enhancements, which includes woodland planting, natural regeneration of hedgerows and the provisions of species-rich grassland and arable field margins created through locally sourced seed where practicable/the existing seed bank and annual cultivation (as set out in further detail in in the benefits Section 5.3 of this document) and biodiversity net gain are afforded substantial positive weight in favour of the Proposed Development.

7.3.7 The Proposed Development provides new permissive paths across the Principal Site to supplement the existing PRoW network, link existing routes and create new and enhance existing connections to surrounding villages. This provides opportunities for recreational access and increases connectivity, therefore the provision of permissive paths should be afforded moderate positive weight in favour of the Proposed Development, given they are only in place for the lifetime of the Proposed Development.

7.3.8 Construction of the Proposed Development will create 600 FTE jobs with approximately 45% of construction staff being sourced from the local area. During operation four permanent jobs would be generated. Job creation provides employment and skills benefits and should be afforded moderate positive weight in favour of the Proposed Development, given the majority of jobs created are for the construction stage only. Alongside this, it should be noted that the Order Limits include a significant portion of retained arable land (the Proposed Development commits to 181ha of retained arable land), which affords benefits associated with to ground nesting birds alongside retention of current farming practice. Furthermore, the retained arable comprises approximately 116ha of Grade 3a BMV land.

7.3.9 In addition to job creation, the total GVA from construction is estimated to contribute £27.4 million to the national economy. The GVA generated should be afforded limited positive weight in favour of the Proposed Development.

Neutral impacts

7.3.10 For those ES topic conclusions that confirm there will be no significant effects from the Proposed Development, these will generally be in accordance with the NPSs and the relevant development plan policies. As a result, the following topics are considered to have neutral weight in the planning balance:

a. Air Quality
b. Civil and Military Aviation.
c. Climate Change
d. Flood Risk and Drainage
e. Glint and Glare
f. Mineral Safeguarding
g. Noise and Vibration
h. Transport and Access
i. Resource and Waste Management
j. Water Quality.

7.3.11 Within the majority of technical chapters, no likely significant effects have been identified through the cumulative effects assessment where they were not already predicted for the Proposed Development in isolation.

Negative impacts

7.3.12 The Proposed Development would lead to less than substantial harm (at the lower end of the scale) to two designated heritage assets and one non-designated heritage asset. However, it should be noted that the effects would be both temporary and reversible, albeit long term. Therefore, it is considered this should be afforded moderate negative weight against the Proposed Development.

7.3.13 The Proposed Development would result in 17 significant adverse landscape and visual effects at construction, operation and decommissioning. While these are temporary and reversible on decommissioning, it is noted that 5 residual significant effects would be experienced during the operation after year 15 of the Proposed Development. It must be acknowledged that in the case of the Proposed Development, the landscape is not protected and that while not eliminated, the landscape and visual effects have been minimised and would reduce over time as mitigation planting matures.

7.3.14 As set out in **Chapter 15: Cumulative Effects and Interactions** of the ES **[EN010154/APP/6.1]**, during operation (year 15) it is considered there would be no notable difference between the landscape and visual effects of the Proposed Development, and the cumulative landscape and visual effects of the Proposed Development.

7.3.15 Overall, it is considered that they would not be so damaging that they would outweigh the benefits of the proposals. While the level of harm identified

weighs against the proposal, it should be afforded moderate negative weight against the Proposed Development.

7.3.16 Whilst there would be a loss of agricultural land in production (although can continue to be grazed) over the lifetime of the Proposed Development, this loss would be both temporary and reversible and soil resource would improve over the lifetime of the Proposed Development. Therefore, this should be afforded moderate negative weight against the Proposed Development.

Planning Balance Summary

7.3.17 Taking the above factors into account and having had regard to all important and relevant matters, it is concluded that there are no adverse impacts of sufficient weight, either on their own or collectively, that would mean that the DCO should not be made. The harm identified to designated and non-designated heritage assets, landscape character and visual amenity, from the temporary loss of agricultural land is clearly outweighed by the substantial public benefits that would arise from the provision of low carbon energy to meet the need identified in the NPSs.

7.4 Application of the CNP presumption

7.4.1 As set out in the Paragraph 4.2.5 of NPS EN-1, solar development is considered to be of CNP for the UK. However, for the CNP presumption to apply, applicants are required to demonstrate "*how their application meets the requirements in this NPS and the relevant technology specific NPS, applying the mitigation hierarchy, as well as any other legal and regulatory requirements."* Paragraph 4.2.14 of NPS EN-1 further states that "*The Secretary of State must be satisfied that the applicant's assessment demonstrates that the requirements set out above have been met. Where the Secretary of State is satisfied that they have been met, the CNP presumptions …. apply".*

Compliance with the Energy NPSs

7.4.2 As demonstrated in this Planning Statement, overall, the Proposed Development accords with the relevant NPSs, and where required it has been demonstrated that any harm caused as a result of the Proposed Development is outweighed by the substantial benefits that are delivered. It is considered that even without applying the CNP presumption, the planning case is firmly in favour of development consent being granted.

Application of the Mitigation Hierarchy

7.4.3 Paragraph 4.2.11 of NPS EN-1 states that "*Applicants must apply the mitigation hierarchy and demonstrate that it has been applied… Applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated."*

7.4.4 **Chapter 5: Environmental Impact Assessment Methodology** of the ES **[EN010154/APP/6.1]** sets out the mitigation hierarchy approach adopted in

the wider **ES [EN010154/APP/6.1/6.2/6.3]** and demonstrates how this has been applied. Where significant effects have been identified, the Applicant has sought to apply the mitigation hierarchy and refine the design of the Proposed Development in order to address the effect. Effects are mitigated as far as possible through embedded mitigation and through the associated framework plans and measures, which are secured via Requirements set out in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. However, residual effects on heritage assets, landscape character and visual receptors (and related cumulative impacts), and agricultural land which cannot be avoided, reduced or mitigated, in accordance with paragraph 4.2.11 of NPS EN-1 remain.

7.4.5 Paragraph 4.2.15 of NPS EN-1 explains that *"Where residual non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. Therefore, in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts."* The exceptions to the presumption of consent are *"residual impacts onshore and offshore which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero.* As demonstrated in this Planning Statement, there are no residual impacts as a result of the Proposed Development which would outweigh the need, nor are there any residual impacts which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero.

7.4.6 As a result, decision making will be in accordance with paragraph 4.2.16 of NPS EN-1 which states "*the Secretary of State will take as the starting point for decision making that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances"*. As demonstrated in this Planning Statement, the tests that require a clear outweighing of harm have been met.

7.4.7 Paragraph 4.2.17 of NPS EN-1 states that *"the Secretary of State will take as a starting point that CNP Infrastructure will meet the following, non-exhaustive, list of tests:*

- *where development within a Green Belt requires very special circumstances to justify development;*
- *where development within or outside a Site of Special Scientific Interest (SSSI) requires the benefits (including need) of the development in the location proposed to clearly outweigh both the likely impact on features of the site that make it a SSSI, and any broader impacts on the national network of SSSIs;*
- *where development in nationally designated landscapes requires exceptional circumstances to be demonstrated; and*

- *where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional".*

7.4.8 The Proposed Development is not within the Green Belt, an SSSI or within or in close proximity to a nationally designated landscape. The Proposed Development has also been assessed to have less than substantial harm (at the lower end) on heritages assets as set out in **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]**.

7.4.9 The effects of the Proposed Development have been assessed as reported in the **ES [EN010154/APP/6.1]** and are discussed throughout this Planning Statement. The mitigation hierarchy has been followed, and appropriate mitigation implemented. The Proposed Development is expected to have limited and localised residual adverse effects during its 60-year operation.

Compliance with other legal and regulatory requirements

7.4.10 The DCO application has been prepared in compliance with other legal and regulatory requirements, as demonstrated below.

Habitats Regulation Assessment

7.4.11 A Habitats Regulations Assessment has been undertaken in accordance with the Conservation of Habitats and Species Regulations 2017. The Proposed Development does not have any effect upon European Sites during construction, operation and maintenance and decommissioning, as demonstrated in the **Habitats Regulation Assessment Report [EN010154/APP/7.13]**.

Water Framework Directive

7.4.12 The Proposed Development is compliant with the objectives of the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 as it would not cause deterioration in the status of the water bodies and would not prevent the water bodies achieving Good Ecological Status and Good Ecological Potential.

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

7.4.13 The DCO application has been prepared in accordance with the requirements of the APFP Regulations 2009 as evidenced in the **Consultation Report [EN010154/APP/5.1]** and the **Consultation Report Appendices [EN010154/APP/5.2]** and in the content of the application itself.

The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

7.4.14 The Environmental Impact Assessment has been undertaken in accordance with the EIA Regulations, as explained in **Chapter 5: Environmental Impact Assessment Methodology** of the ES **[EN010154/APP/6.1]**.

CNP Presumption

7.4.15 Given the Applicant has demonstrated that the Proposed Development is in accordance with the NPS, the mitigation hierarchy has been applied and compliance with other legal and regulatory requirements has also been demonstrated, it can be concluded the CNP presumption applies to the Proposed Development and accordingly should be taken into account in decision making.

7.5 Summary

7.5.1 In summary, it has been demonstrated that for decision making in accordance with s104 of the PA 2008, the Proposed Development seeks to avoid and mitigate impacts on the environment and sensitive receptors where possible, with the benefits outweighing any impact. There are no sensitive designations to prevent the Proposed Development help to deliver the CNP infrastructure to contribute to the UK's urgent requirement for the delivery of new renewable energy generation capacity and infrastructure.

8. Conclusion

8.1.1 This Planning Statement has been prepared to support the application for a DCO for the construction, operation and maintenance, and decommissioning of Fosse Green Energy.

8.1.2 The Proposed Development will provide a significant amount of renewable energy over its 60-year lifetime supporting resilience, security and affordability of electricity supplies. It would be a critical part of the national portfolio of renewable energy generation that is required to decarbonise its energy supply quickly.

8.1.3 The Proposed Development will help meet the urgent need for this infrastructure to support "*energy objectives, together with the national security, economic, commercial, and net zero benefits"* as set out in NPS EN-1. It is infrastructure defined as being of critical national importance.

8.1.4 Having regard to all of the above, the substantial benefits of the Proposed Development clearly and demonstrably outweigh the harms that would arise with the proposed mitigation measures in place. Adverse effects would be localised, short-term, temporary and/or reversible at the end of the Proposed Development's lifetime.

8.1.5 As a result, the Proposed Development is in accordance with national energy policy, national planning policy and the relevant development plan documents when considered as a whole. None of the limited exceptions in S104(4)-(8) of the PA 2008 apply.

8.1.6 The overall planning balance is, therefore, overwhelmingly in favour of the grant of development consent for the Proposed Development.

9. References

Ref. 1 HM Government (2008). Planning Act 2008. Available at: https://www.legislation.gov.uk/ukpga/2008/29/contents?lang=en

Ref. 2 Department for Energy Security and Net Zero (2023). Overarching National Policy Statement for energy (EN-1). Available at: https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1

Ref. 3 Department for Energy Security and Net Zero (2023). National Policy Statement for electricity networks infrastructure (EN-5). Available at: https://www.gov.uk/government/publications/national-policy-statement-for-electricity-networks-infrastructure-en-5

Ref. 4 HM Government (2009). Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 (as amended) (the APFP Regulations). Available at: https://www.legislation.gov.uk/uksi/2009/2264/made

Ref. 5 HM Government (2010). The Infrastructure Planning (Compulsory Acquisition) Regulations 2010. Available at: https://www.legislation.gov.uk/uksi/2010/104/contents/made

Ref. 6 HM Government (2017). The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. Available at: https://www.legislation.gov.uk/uksi/2017/572/contents/made

Ref. 7 Ministry of Housing, Communities and Local Government and Department for Levelling Up, Housing and Communities (2024). Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects. Available at: https://www.gov.uk/guidance/planning-act-2008-pre-application-stage-for-nationally-significant-infrastructure-projects

Ref. 8 The Planning Inspectorate (2024). Nationally Significant Infrastructure Projects: Advice on the Preparation and Submission of Application Documents. Available at: https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-the-preparation-and-submission-of-application-documents

Ref. 9 The Planning Inspectorate (2024). Nationally Significant Infrastructure Projects: Advice for Local Authorities. Available at: Nationally Significant Infrastructure Projects: Advice for Local Authorities - GOV.UK

Ref. 10 Ministry of Housing, Communities and Local Government (2024). National Planning Policy Framework. Available at: https://www.gov.uk/guidance/national-planning-policy-framework

Ref. 11 Ministry of Housing, Communities and Local Government, Ministry of Housing, Communities & Local Government (2018 to 2021) and Department for Levelling Up, Housing and Communities (2024). Planning practice guidance. Available at: https://www.gov.uk/government/collections/planning-practice-guidance

Ref. 12 Central Lincolnshire Joint Strategic Planning Committee (2023). Central Lincolnshire Local Plan. Available at: https://www.n-kesteven.gov.uk/sites/default/files/2023-04/Local%20Plan%20for%20adoption%20Approved%20by%20Committee.pdf

Ref. 13 Lincolnshire Country Council (2016). Lincolnshire Minerals and Waste Local Plan Core Strategy and Development Management Policies Plan. Available at: https://www.lincolnshire.gov.uk/downloads/file/2361/core-strategy-and-development-management-policies

Ref. 14 Lincolnshire Country Council (2017). Lincolnshire Minerals and Waste Local Plan Site Locations. Available at: https://www.lincolnshire.gov.uk/downloads/file/2274/adopted-site-locations-pdfa

Ref. 15 Thorpe on the Hill Parish Council (2018). Thorpe on the Hill Neighbourhood Plan. Available at: https://www.n-kesteven.gov.uk/sites/default/files/2023-01/neighbourhood_plan_thorpe_on_the_hill.pdf

Ref. 16 Bassingham Parish Council (2017). Bassingham Neighbourhood Plan. Available at: https://www.n-kesteven.gov.uk/sites/default/files/2023-01/bassingham_neighbourhood_plan.pdf

Ref. 17 Coleby Parish Council (2018). Coleby Neighbourhood Plan. Available at: https://www.n-kesteven.gov.uk/sites/default/files/2023-01/coleby_neighbourhood_plan.pdf

Ref. 18 HM Government (2012). The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). Available at: https://www.legislation.gov.uk/uksi/2012/767/contents

Ref. 19 The Planning Inspectorate (2018). Nationally Significant Infrastructure Projects - Advice Note Nine: Rochdale Envelope. Available at: https://www.gov.uk/government/publications/nationally-significant-infrastructure-projects-advice-note-nine-rochdale-envelope

Ref. 20 Department for Energy Security and Net Zero (2023) Overarching National Policy Statement for energy (EN-3). Available at: https://assets.publishing.service.gov.uk/media/65a7889996a5ec000d731aba/nps-renewable-energy-infrastructure-en3.pdf

Ref. 21 Ministry of Housing, Communities and Local Government, Ministry of Housing, Communities & Local Government (2018 to 2021) and Department for Levelling Up, Housing and Communities (2024) National Planning Practice Guidance. Available at: Planning practice guidance - GOV.UK National Planning Policy Framework

Ref. 22 Department for Environment, Food and Rural Affairs (2010) Noise Policy Statement for England (NPSE). Available at: Noise Policy Statement for England

Ref. 23 Department for Energy Security and Net Zero (2023) Powering up Britain. Available at: Powering Up Britain - Joint Overview

Ref. 24 OFGEM (2025). Average Gas and Electricity Usage. Available at: https://www.ofgem.gov.uk/information-consumers/energy-advice-households/average-gas-and-electricity-use-explained

Ref. 25 HM Government (2008). Climate Change Act. Available at: https://www.legislation.gov.uk/ukpga/2008/27/contents

Ref. 26 Department for Energy Security and Net Zero and Department for Business, Energy & Industrial Strategy (2022). Net Zero Strategy: Build Back Greener. Available at: https://www.gov.uk/government/publications/net-zero-strategy

Ref. 27 United Nations (2015) Paris Agreement. Available at: ADOPTION OF THE PARIS AGREEMENT - Paris Agreement text English

Ref. 28 UK Government (2023) Carbon Budget Delivery Plan. Available at: Carbon Budget Delivery Plan - GOV.UK

Ref. 29 UK Government (2020) Energy White Paper: Powering our net zero future. Available at:assets.publishing.service.gov.uk/media/5fdc61e2d3bf7f3a3bdc8cbf/201216_BEIS_EWP_Command_Paper_Accessible.pdf

Ref. 30 UK Government (2022) British Energy Security Strategy. Available at: British Energy Security Strategy

Ref. 31 UK Government (2024) Clean Power 2030 Action Plan: A new era of clean electricity. Available at:assets.publishing.service.gov.uk/media/677bc80399c93b7286a396d6/clean-power-2030-action-plan-main-report.pdf

Ref. 32 Rt Hon Chris Skidmore MP (2023) Mission Zero – Independent Review of Net Zero. Available at: MISSION ZERO - Independent Review of Net Zero

Ref. 33 National Fire Chief's Council (2023) Grid Scale Battery Energy Storage System Planning – Guidance for FRS. Available at: https://nfcc.org.uk/wp-content/uploads/2023/10/Grid-Scale-Battery-Energy-Storage-System-planning-Guidance-for-FRS.pdf

Ref. 34 Ministry of Housing, Communities and Local Government (2013) Planning Act 2008: Associated development applications for major infrastructure projects. Available at: https://assets.publishing.service.gov.uk/media/5a7b5f04ed915d3ed9063f36/Planning_Act_2008_-_Guidance_on_associated_development_applications_for_major_infrastructure_projects.pdf

Ref. 35 Secretary of State for Energy Security and Net Zero (2024) Solar and protecting our Food Security and Best and Most Versatile (BMV) Land. Available at: Written statements - Written questions, answers and statements - UK Parliament

Ref. 36 UK Government (2021) Environment Act 2021. Available at: Environment Act 2021

Ref. 37 UK Government (2004) Planning and Compulsory Purchase Act 2004. Available at: Planning and Compulsory Purchase Act 2004

Ref. 38 UK Government (2025) Consultation on Biodiversity Net Gain for Nationally Significant Infrastructure Projects. Available at: Consultation on Biodiversity Net Gain for Nationally Significant Infrastructure Projects May 2025.pdf

Ref. 39 North Kesteven District Council (2024). Climate Emergency Action Plan 2024 – 2025. Available at: https://www.n-kesteven.gov.uk/climate-change/climate-emergency-action-plan-2024-2025/climate-emergency-action-plan-2024-2025

Ref. 40 National Fire Chiefs Councils (2024). Draft Guidance on Grid Scale Battery Energy Storage Systems (BESS). Available at: https://nfcc.org.uk/consultation/draft-grid-scale-energy-storage-system-planning-guidance/ [Accessed 13/06/2025]

Ref. 41 UK Government (2024). Greenhouse gas reporting: conversion factors 2024. Available at: https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2024

Ref. 42 DEFRA (2024). The Statutory Biodiversity Metric. Available at: https://assets.publishing.service.gov.uk/media/6867e62810d550c668de3b4e/The_Statutory_Metric_Macro_Disabled_1.0.4.xlsx

Abbreviations

Term	Definition
AIA	Arboricultural Impact Assessment
AGLV	Area of Great Landscape Value
ALC	Agricultural Land Classification
AONB	Areas of Outstanding Natural Beauty
AW	Ancient Woodland
BESS	Battery Energy Storage System
BMV	Best and Most Versatile
BNG	Biodiversity Net Gain
BPM	Best Practice Measures
BSMP	Battery Safety Management Plan
BSSS	British Society of Soil Science
CCC	Climate Change Committee
CCRA	Climate Change Risk Assessment
CEMP	Construction Environmental Management Plan
CLG	Community Liaison Group
CLLP	Central Lincolnshire Local Plan
CNP	Critical National Priority
CNS	Communications, Navigation and Surveillance
COMAH	Control of Major Accident Hazards
CCR	Climate Change Risk (Assessment)
CTMP	Construction Traffic Management Plan
DC	Direct Current
DCO	Development Consent Order
DCLG	Department for Communities and Local Government
DECC	Department of Energy and Climate Change
DEFRA	Department of Environment, Food and Rural Affairs
DEMP	Decommissioning Environmental Management Plan
DLCA	District Landscape Character Area
DMP	Dust Management Plan
DMMO	Definitive Map Modification Order

Term	Definition
DNS	Development of National Significance
DRA	Dust Risk Assessment
EA	Environment Agency
EIA	Environmental Impact Assessment
EN-1	Overarching National Policy Statement for Energy
EN-3	National Policy Statement for Renewable Energy Infrastructure
EN-5	National Policy Statement for Electricity Networks Infrastructure
EPA	Environmental Protection Act
EMF	Electric and Electro-magnetic Fields
EPS	European Protected Species
ES	Environmental Statement
ESO	Electricity System Operator
FES	Future Energy Scenarios
FRA	Flood Risk Assessment
FTE	Full Time Employment
GHG	Greenhouse Gas Emissions
GPP	Good Practice Guidance
GVA	Gross Value Added
GW	Gigawatt
GWh	Gigawatt hours
GWp	Gigawatt Peak
Ha	Hectares
HGV	Heavy Goods Vehicle
HRA	Habitats Regulations Assessment
HSE	Health and Safety Executive
ICCI	In-Combination Climate Change Impact
IEF	Important Ecological Features
IEMA	Institute of Environmental Management and Assessment
km	Kilometre

Term	Definition
Kv	Kilovolt
kWh	Kilowatt hour
LA	Local Authority
LC	Lincolnshire County Council
LCA	Landscape Character Area
LCC	Local County Council
LEMP	Landscape and Ecological Management Plan
LIR	Local Impact Report
LGS	Local Green Space
LGV	Light Goods Vehicle
LLCA	Local Landscape Character Area
LNR	Local Nature Reserve
LOAEL	Lowest Observed Adverse Effect Level
LSE	Likely Significant Effects
LVIA	Landscape and Visual Impact Assessment
LWS	Local Wildlife Site
MHCLG	Ministry of Housing, Communities and Local Government
MSA	Mineral Safeguarding Area
MtCO2e	Mega tonnes of CO2 equivalent
MW	Megawatt
MWh	Megawatt hours
NBW	National Cycle Network
NCA	National Character Area
NCN	National Highways
NE	Natural England
NETS	National Energy Transmission System
NIC	National Infrastructure Commission
NFCC	National Fire Chiefs Council
NK	North Kesteven
NKDC	North Kesteven District Council

Term	Definition
NLCA	National Landscape Character Area
NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance
NPS	National Policy Statement
NPSE	National Policy Statement for England
NSIP	Nationally Significant Infrastructure Project
OEMP	Operation Environmental Management Plan
ONS	Office for National Statistics
OS	Ordnance Survey
PEI	Preliminary Environmental Information
PPE	Personal Protective Equipment
PPG	Planning Practice Guidance
PRA	Preliminary Risk Assessment
PRoW	Public Rights of Way
PRoW-MP	Public Rights of Way Management Plan
PV	Photovoltaic
RPG	Registered Park and Garden
SAC	Special Area of Conservation
SAC(s)	Special Area(s) of Conservation
SINC	Site of Importance for Nature Conservation
SOAEL	Significant Observed Adverse Effect Level
SoCC	Statement of Community Consultation
SPA	Special Protection Area
SPA(s)	Special Protection Area(s)
SPD	Supplementary Planning Guidance
SSSI	Site of Special Scientific Interest
SSSI(s)	Site(s) of Special Scientific Interest
SuDS	Sustainable Drainage Systems
TA	Transport Assessment
TCPA	Town and Country Planning Act 1990
TTM	Temporary Traffic Management

Term	Definition
tCO2e	Tonnes CO2 equivalent
UK	United Kingdom
UNFCC	United Nations Framework Convention on Climate Change
WHO	World Health Organisation
WMP	Water Management Plan
WVLRPA	Witham Landscape Recovery Project Area

Glossary of Frequently Used Terms

Term	Definition
Applicant	Fosse Green Energy Limited
Battery Energy Storage System (BESS)	A battery system and ancillary infrastructure such as transformers to allow for the storage, importation and exportation of energy to the national transmission network.
Biodiversity Net Gain (BNG)	BNG is a strategy to develop land and contribute to the recovery of nature. It is a way of making sure the habitat for wildlife is in a better state than it was before development.
Cables	The cables, which transmit electricity from the transformers to the project substation.
Cable Corridor	The area within which the high voltage, 400kV export connection cable will be installed between the Principal Site and the proposed National Grid substation near Navenby.
Cumulative Effects	Effects upon the environment that result from the incremental impact of an action when added to other past, present or reasonably foreseeable actions. Each impact by itself may not be significant but can become a significant effect when combined with other impacts.
Detailed Construction Environmental Management Plan (CEMP)	Subsequently produced following the appointment of the contractor, when the detailed design of the Proposed Development is known, in accordance with a requirement of the DCO prior to commencing construction. It will be a live document and will provide a systematic approach to environmental management so that environmental risks are identified, incorporated in all decision-making and managed appropriately.
Development Consent Order (DCO)	Development consent is required pursuant to the Planning Act 2008 for Nationally Significant Infrastructure Projects. A development consent order is the order which grants development consent when an application is made to the Secretary of State.
Environmental Effect	The consequence of an action (impact) upon the environment such as the decline of a breeding bird population as a result of the removal of hedgerows and trees.
Environmental Impact Assessment (EIA)	A process by which information about environmental effects of a proposed development is collected,

Term	Definition
	assessed and used to inform decision making. For certain projects, EIA is a statutory requirement.
Environmental Impact	The change in the environment from a development such as the removal of a hedgerow.
Environmental Statement	A document produced in accordance with the EIA Directive as transposed into UK law by the EIA Regulations to report the results of an EIA.
Export Cables	Buried 400kV high-voltage cables to be installed within the Cable Corridor to the national transmission network.
Framework Construction Environmental Management Plan (CEMP)	Provides a framework from which a final CEMP will be developed to avoid, minimise or mitigate any construction effects on the environment.
Framework Decommissioning Environmental Management Plan (DEMP)	A specific plan developed to ensure that appropriate environmental management practices are followed during the decommissioning phase of a project.
Framework Operational Environmental Management Plan (OEMP)	A specific plan developed to ensure that appropriate environmental management practices are followed during the operation and maintenance phase of a project.
Grid Connection Route	The cable route between the Principal Site and the proposed National Grid substation near Navenby.
Heritage Asset	A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).
Interconnecting Cables	Buried 33kV medium-voltage cables to be installed within Interconnecting Cable Corridors, linking Power Conversion Stations to the Onsite Substation.
Interconnecting Cable Corridors	The area within which 33kV interconnecting cables may be installed.
Inverter	Inverters convert the direct current (DC) electricity collected by the PV modules into alternating current (AC), which allows the electricity generated to be exported to the National Grid. Battery energy storage systems also use inverters to convert between DC and

Term	Definition
	AC. The batteries function in DC and electricity must be converted to AC to pass into or from the National Grid.
Magnitude (of effect)	A term that combines judgements about the size and scale of the effect, the extent of the area over which it occurs, whether it is reversible or irreversible and whether it is short or long term in duration.
Mitigation	Measures including any process, activity, or design to avoid, prevent, reduce, or, if possible, offset any identified significant adverse effects on the environment.
National Grid Electricity Transmission (NGET) ('National Grid')	National Grid operate the national electricity transmission network across Great Britain and own and maintain the network in England and Wales, providing electricity supplies from generating stations to local distribution companies. National Grid does not distribute electricity to individual premises, but its role in the wholesale market is vital to ensuring a reliable, secure, and quality supply to all.
NPS	National Policy Statement. National Policy Statements are produced by government. They comprise the government's central policy documents for the development of nationally significant infrastructure.
Nationally Significant Infrastructure Projects (NSIP)	NSIPs are large scale developments such as certain new harbours, power generating stations (including wind farms), highways developments and electricity transmission lines, which require a type of consent known as 'development consent' under procedures governed by the Planning Act 2008 (and amended by the Localism Act 2011).
On-Site Cables	Cables within the Solar PV Site which connect the Solar PV Panels to inverters, and inverters to transformers.
Onsite Substation	A project substation to consolidate the voltage generated by the solar PV and BESS, to facilitate exportation of energy to the national transmission network.
Order Limits	The limits shown on the land plans and works plans within which the authorised development may be carried out and land acquired or used.
Planning Act 2008	An Act to establish the Infrastructure Planning Commission and make provision about its functions; to make provision about, and about matters ancillary to,

Term	Definition
	the authorisation of projects for the development of nationally significant infrastructure; to make provision about town and country planning; to make provision about the imposition of a Community Infrastructure Levy; and for connected purposes.
Planning Statement	This document.
Principal Site	The infrastructure for which Development Consent will be sought, named Fosse Green Energy.
Receptor	A component of the natural or man-made environment that is affected by an impact, including people.
Significance	A measure of the importance or gravity of the environmental effect, defined by significance criteria specific to the environmental topic.
Site	The area within which the Proposed Development will be sited, comprising the Solar PV Array Area, Interconnecting Cable Corridors and the Grid Connection Corridor.
Site Boundary	The maximum extent of land potentially required temporarily and/or permanently for the construction, operation and maintenance of the Proposed Development.
Secretary of State	His Majesty's principal secretaries of state, or secretaries of state, are senior ministers of the Crown in the Government of the United Kingdom. In this case, reference is made to the Secretary of State for Energy Security and Net Zero.
Solar PV Array Area	The area within the DCO Site where solar PV array areas, Power Conversion Stations, Battery energy storage systems, and Onsite Substation can be installed. Within this area there are individual Parcels, e.g. Parcel 1, 2, and so on, to assist the description of the DCO Site.
Solar PV Array	A distinct group of PV Tables which are grouped together.
Solar PV	PV Modules placed on Mounting Structures arranged in rows (known as PV Tables).
Study Area	The area in which a particular assessment or survey targets. The study area will vary depending on the nature of the technical assessment. Where relevant, these are defined within the relevant technical chapter of the Environmental Statement.

Term	Definition
Switchgear	A combination of electrical disconnect switches, fuses, or circuit breakers used to control, protect and isolate electrical equipment.
Power Conversion Stations	Transformers and switchgear, with the option of co-located inverters, which will consolidate the energy generated by the solar PV and convert it to alternating current and step up the voltage.
The Planning Inspectorate	The Planning Inspectorate deals with planning appeals, national infrastructure planning applications, examinations of local plans and other planning-related and specialist casework in England.
The Proposed Development	The infrastructure for which Development Consent will be sought, named Fosse Green Energy. The site comprises a Principal Site (1,070 ha) and Cable Corridor (298 ha).'. It comprises solar photovoltaic (PV), battery energy storage system, and associated infrastructure, and connection to the national transmission network via a buried grid connection. Specific components of the Proposed Development include: • Solar PV; • Solar PV Array; • Battery energy storage system (BESS); • Power Conversion Stations; • Onsite Substation; • Interconnecting cables; and • Export cables.
The Proposed National Grid Substation Near Navenby (NGET Navenby Substation)	Proposed regional substation near Navenby. This is not part of the Proposed Development and will be delivered independently by NGET.
The Site	The collective term for the Principal Site and Cable Route Corridor.
Transformers	Transformers control the voltage of the electricity generated across the site before it reaches the electrical infrastructure.

Appendix A Site Selection Report

Fosse Green Energy



Fosse Green Energy

EN010154

7.2 Planning Statement Appendix A: Site Selection Report

VOLUME

7

Planning Act 2008 (as amended)

Regulation 5(2)(q)

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

18 July 2025

Planning Act 2008

The Infrastructure Planning
(Applications: Prescribed Forms and
Procedure) Regulation 2009 (as amended)

Fosse Green Energy

Development Consent Order 202[ ]

7.2 Planning Statement Appendix A: Site Selection Report

Regulation Reference	Regulation 5(2)(q)
Planning Inspectorate Scheme Reference	EN010154
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Author	Fosse Green Energy Limited

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Executive Summary

ES1 This Site Selection Report (SSR) has been prepared on behalf of Fosse Green Energy Limited ('the Applicant') in relation to an application for a Development Consent Order (DCO) for the construction, operation and maintenance, and decommissioning of Fosse Green Energy (the Proposed Development).

ES2 The identification of the site for the Proposed Development was driven by the availability of deliverable land and site suitability in accordance with the requirements of policy. Following a formal application to National Grid for a connection into the 400kV Overhead Line at Whisby, National Grid informed the Applicant that this point of connection was not available and instead the Applicant was offered and subsequently secured a point of connection at the proposed National Grid substation near Navenby, which was a location capable of serving multiple customers, including the Applicant. Having secured land with willing landowners, and in recognition of the need to consider reasonable alternatives, the Applicant sought to assess the site against other potential alternative sites to ensure it was the most suitable taking into account operational requirements, national and local planning policy and planning and environmental constraints. This SSR sets out the approach to assessing the suitability of the site for the Proposed Development and potential alternative sites against a range of planning, environmental and operational criteria for a generating station with capacity of more than 50MW.

ES3 This report concludes that the location of the Proposed Development comprises a suitable site when compared with other potential alternative sites when taking into account planning and environmental constraints and operational considerations. The location of the Proposed Development is therefore assessed as being appropriate to deliver the Proposed Development and therefore accords with the consideration of site selection as set out in the Overarching National Policy Statement for Energy (EN-1) (Ref 23) and the National Policy Statement for Renewable Energy Infrastructure (EN-3) (Ref 4).

1. Introduction

1.1 Project Background

1.1.1 This Site Selection Report (SSR) has been prepared on behalf of Fosse Green Energy Limited (the Applicant) in relation to an application for a Development Consent Order (DCO) for the construction, operation and maintenance, and decommissioning of Fosse Green Energy (the Proposed Development). The SSR sets out the potential alternative sites considered which have been assessed against a range of planning, environmental and operational criteria.

1.1.2 The Proposed Development comprises the construction, operation (including maintenance), and decommissioning of a ground-mounted solar photovoltaic (PV) electricity generating station with access provision, battery storage, Onsite Substation, underground cabling and associated infrastructure to generate and export and import electricity; and areas of landscaping and biodiversity enhancement. The Proposed Development will export and import electricity to the national electricity transmission network.

1.1.3 The Proposed Development also includes a 400kV underground Cable Route Corridor of approximately 10km in length connecting the Onsite Substation to the proposed National Grid substation near Navenby which will be subject to an application to be made by National Grid under the Town and Country Planning Act (TCPA) 1990 (Ref 1). A full description of the Proposed Development is included in **Chapter 3: The Proposed Development** of the Environmental Statement (ES) **[EN010154/APP/6.1]**.

1.1.4 The Proposed Development, by virtue of its generating capacity being more than 50MW, is classified as a Nationally Significant Infrastructure Project (NSIP) under s14(1)(a), s15(1) and s15(2) of the Planning Act 2008 (as amended) (Ref 2) and requires an application for a Development Consent Order (DCO). The application will be submitted to the Planning Inspectorate and the decision whether to grant a DCO will be made by the Secretary of State for Energy Security and Net Zero (the Secretary of State).

1.1.5 The Proposed Development will be located approximately 9km to the south and south west of Lincoln City Centre, in proximity to the villages of Thorpe on the Hill, Witham St Hughs, Haddington, Thurlby, Navenby, and Bassingham. The Order limits of the Proposed Development, comprise approximately 1,368 hectares (ha) of land which includes:

a. The DCO Site – the maximum extent of land required for the construction, operation (including maintenance), and decommissioning of the Proposed Development. The DCO Site comprises the Principal Site and the Cable Corridor.

b. Principal Site – the area of the DCO Site covered by the ground-mounted PV panels, Solar Stations, battery energy storage system (BESS), Onsite Substation, planting and mitigation areas, interconnecting cables between solar PV areas, and associated infrastructure. The total area of the Principal Site is approximately 1,070ha.

c. Cable Corridor – the area of the Site in which the 400 kilovolt (kV) and associated cables (the Grid Connection Cables) will be installed between the Onsite Substation and the proposed National Grid substation near Navenby. The proposed Navenby substation is subject to a separate application and does not form part of the Proposed Development. The Cable Corridor partially overlaps the Principal Site and is approximately 351ha.

1.2 Structure of this report

1.2.1 The SSR is structured as follows:

a. Section 2 describes the context of the assessment in terms of planning policy and the Proposed Development;

b. Section 3 describes the approach to the consideration of potential alternative sites;

c. Section 4 sets out the assessment results;

d. Section 5 provides the conclusion of the site selection assessment;

e. Section 6 includes the document references; and

f. Section 7 includes a list of abbreviations.

2. Site Selection Context

2.1 Planning Policy Context

2.1.1 National planning policy does not set out a requirement to consider alternative sites for proposed energy development, stating at Paragraph 4.3.9 of the Overarching National Policy Statement for Energy EN-1 (NPS EN-1) (Ref 3) *"This NPS does not contain any general requirement to consider alternatives or to establish whether the proposed project represents the best option from a policy perspective"*. Furthermore, paragraph 2.3.5 of the National Policy Statement for Renewable Energy Infrastructure (EN-3) (NPS EN-3) (Ref 4) provides that *"It is for applicants to decide what applications to bring forward. In general, the government does not seek to direct applicants to particular sites for renewable energy infrastructure".*

2.1.2 Paragraph 2.3.9 of NPS EN-3 (Ref 4) also recognises that *"most renewable energy resources can only be developed where the resource exists and where economically feasible, and because there are no limits on the need established in Part 3 of EN-1, the Secretary of State should not use a consecutive approach in the consideration of renewable energy projects (for example, by giving priority to the re-use of previously developed land for renewable technology developments)".*

2.1.3 However, NPS EN-1(Ref 3), NPS EN-3 (Ref 4) and the National Policy Statement for Electricity Networks Infrastructure (EN-5) (NPS EN-5) (Ref 6) contain relevant considerations that need to be taken into account at site selection, including the following:

a. Paragraph 4.3.9 of NPS EN-1 relates to compulsory acquisition stating, *"there are specific requirements in relation to compulsory acquisition"*. Section 3.4 of this SSR demonstrates that the approach to site selection sought to reduce the need for Compulsory Acquisition powers to be used.

b. Paragraph 5.2.7 of NPS EN-1 states that *"Projects near a sensitive receptor site for air quality should only be proposed in exceptional circumstances if no viable alternative site is available"*. As confirmed in **Section 14-2** of **Chapter 14 Other Environmental Topics** of the ES **[EN010154/APP/6.1]** ***"****There are no Air Quality Management Areas (AQMAs) within the administrative area of North Kesteven District Council and air quality is generally considered to be good"* therefore air quality does not form part of the assessment criteria used to inform the site selection process.

c. Paragraph 5.8.36 of NPS EN-1 provides that "*In determining an application for development consent, the Secretary of State should be satisfied that where relevant: the Sequential Test has been applied and satisfied as part of site selection".* Section 3.3 of this SSR demonstrates that areas at risk of flooding are initially excluded from the area of search, therefore demonstrating that the sequential test has been considered, as also set out in the **Planning Statement [EN010154/APP/7.2]**. Flood risk

is also an assessment criterion for site selection, as set out in Appendix A of this SSR.

d. Paragraph 5.4.42 of NPS EN-1 (Ref 3) sets out that *"As a general principle… development should, in line with the mitigation hierarchy, aim to avoid significant harm to biodiversity and geological conservation interests, including through consideration of reasonable alternatives".* Section 4.2 of this SSR states the ecological and geological sites excluded from the area of search in order to avoid impacts. Ecology and biodiversity are also an assessment criterion for site selection, as set out in Appendix A of this SSR.

e. Paragraphs 2.10.18 to 2.10.48 of NPS EN-3 (Ref 4) set out the following factors that influence site selection and design:

   i. *"Irradiance and site topography"* – Solar array shading and topography comprise assessment criteria for site selection, as set out in Appendix A of this SSR. In addition, see section 3.4 of this SSR which sets out how site topography has been taken into account in site selection.

   ii. *"Network connection"* – The grid connection is an assessment criterion for site selection, as set out in Appendix A of this SSR. See also sections 2.3 and 4.2 of this SSR which set out how the network connection was taken into account in site selection.

   iii. *"Proximity of a site to dwellings*" – Land use, which includes consideration of proximity to urban areas, is an assessment criterion for site selection, as set out in Appendix A of this SSR. See also sections 2.3 and 4.2 of this SSR which also set out how the proximity of residential receptors was taken into account in site selection.

   iv. *"Agricultural land classification and land type"* – Sections 3.3 and 3.6 of this SSR set out how agricultural land, including land categorised as best and most versatile, has been considered in relation to site selection. Land type, specifically previously developed land (PDL), is considered in section 3.4 of this SSR.

   v. *"Accessibility"* – Access for construction traffic is an assessment criterion for site selection, as set out in Appendix A of this SSR.

   vi. *"Public Rights of Way"* – Within the 'Land Use' criteria for site selection, the number and location of public rights of way are considered, as set out in Appendix A of this SSR.

   vii. *"Security and lighting*" are not a consideration at the site selection stage. However, it has been taken into account in the design of the Proposed Development.

f. Paragraph 2.2.2 of NPS EN-5 (Ref 6) in relation to the grid connection cable states that *"Siting is determined by… the location of new generating stations or other infrastructure requiring connection to the*

network". As set out above, the grid connection was an assessment criterion for site selection, as set out in Appendix A of this SSR.

2.1.4 In addition to the above considerations for site selection, landscape and visual and cultural heritage were also considered despite there being no reference in NPS EN-1 (Ref 3), NPS EN-3 (Ref 4) and NPS EN-5 (Ref 6) to these topics in terms of alternatives or site selection. Notwithstanding, it is considered that these topics are key matters to consider at the site selection stage in order to minimise impacts on sensitive receptors and accordingly they are considered in Appendix A of this SSR.

2.2 Environmental Impact Assessment

2.2.1 Although national planning policy does not require the consideration of alternative sites, s14(2)(d) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) (Ref. 24) requires an environmental statement to include "*a description of the reasonable alternatives studied by the applicant, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment"*. Therefore, this SSR sets out the alternative sites considered, and is summarised in, and should be read alongside, **Chapter 4: Alternatives and Design Evolution** of the **ES [EN010154/APP/6.1].**

2.3 Site Selection Context

2.3.1 During the consenting of the Mallard Pass Solar Project, (which was promoted by the Applicant), the Applicant was approached by a group of landowners who were willing to provide land north of the A46 at Morton Manor and Housham Grange, which comprises a large area of contiguous land, for the purposes of a nationally significant infrastructure project related to solar energy generation. Following a review of available capacity in the transmission network the Applicant identified a line in and line out connection into the 400kV Overhead Line close to Whisby Hall. A desk top review of the site to consider planning and environmental constraints, concluded that the site was viable, and accordingly, a formal application was made to National Grid for a connection into the 400kV Overhead Line. However, National Grid informed the Applicant that this point of connection (POC) was not available and instead the Applicant was offered and subsequently secured a POC at the proposed National Grid substation near Navenby, which was a location capable of serving multiple customers, including the Applicant.

2.3.2 Following confirmation of the POC, further land was secured to the south of the A46 which brought the site closer to the proposed National Grid substation near Navenby to support delivery of the Proposed Development.

2.3.3 Given the identification of the site for the Proposed Development was driven by the availability of deliverable land and site suitability in line with the requirements of policy and in recognition of the need to consider reasonable alternatives, the Applicant sought to assess the site against other potential alternative sites to ensure it was the most suitable taking into account

operational requirements, national and local planning policy and planning and environmental constraints. Therefore, the site selection process set out in this SSR seeks to confirm that the site identified is the most suitable for the purposes of delivering the Proposed Development, firstly considering whether it would be possible to locate the Proposed Development on an unconstrained site, and secondly whether an alternative site would perform better against the assessment criteria.

3. Assessment Methodology

3.1.1 Set out below is the five stage approach undertaken by the Applicant to identify a site suitable to deliver the Proposed Development.

3.2 Stage 1 – Identification of the area of search

3.2.1 The first stage of assessment is the identification of an area of search, based on the POC. The need for an available connection with appropriate capacity is essential to deliver a large-scale solar development. Paragraph 2.10.24 of NPS EN-3 (Ref 4) recognises that *"…the connection voltage, availability of network capacity, and the distance from the solar farm to the existing network can have a significant effect on the commercial feasibility of a development proposal."*

3.2.2 The extent of the area of search was informed by land secured by the Applicant at Morton Manor and Housham Grange.

3.3 Stage 2 – Exclusion of planning and environmental constraints

3.3.1 The second stage of assessment seeks to establish if there is an alternative, unconstrained, site that could deliver the Proposed Development by excluding planning and environmental constraints from the area of search. Set out below are the constraints identified and excluded at Stage 2.

Best and Most Versatile Agricultural Land

3.3.2 Paragraph 5.11.12 of NPS EN-1 (Ref 3) states that *"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)".* Furthermore, paragraph 2.10.29 of NPS EN-3 (Ref 4) states that *"Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of 'Best and Most Versatile' agricultural land where possible".*

3.3.3 The Written Ministerial Statement (WMS) dated 15 May 2024 (Ref 5) relates to solar development and balancing the need to deliver low carbon renewable energy and energy security with the need to protect food security and the best and most versatile agricultural land. The WMS states that *"For all applicants the highest quality agricultural land is least appropriate for solar development and as the land grade increases, there is a greater onus on developers to show that the use of higher quality land is necessary. Applicants for Nationally Significant Infrastructure Projects should avoid the use of Best and Most Versatile agricultural land where possible"*.

3.3.4 For the purposes of Stage 2, all ALC grade 1, 2 and 3 land was excluded from the area of search. In considering agricultural land classification, the Applicant reviewed Natural England's 1970s Provisional Agricultural Land Classification and Agricultural Land Classification - Post 1988 Survey datasets. Given these

datasets do not distinguish between grade 3a best and most versatile (BMV) land and grade 3b (non-BMV) land, for the purposes of stage 2 of the site selection process, all grade 3 land (together with grade 1 and 2) was excluded, so that the initial search was focussed on non-BMV land.

Flood Risk

3.3.5 Paragraph 5.8.6 of NPS EN-1 (Ref 3) sets out that planning policy on development and flood risk aims to "*ensure that flood risk from all sources of flooding is taken into account at all stages in the planning process to avoid inappropriate development in area at risk of flooding and to steer new development to areas with the lowest risk of flooding".* Paragraph 5.8.7 provides that where new energy infrastructure is located in flood risk areas, policy aims to "*make it safe for its lifetime without increasing flood risk elsewhere and where possible, by reducing flood risk overall".* In decision making, paragraph 5.8.36 of NPS EN-1 sets out that the Secretary of State should be satisfied that "*the Sequential Test has been applied and satisfied as part of site selection".* Paragraph 2.3.3 of NPS EN-5 (Ref 6) expects electrical connection infrastructure to be resilient to flooding.

3.3.6 Given the above and adopting the sequential approach, areas within Flood Zones 2 and 3 were excluded at Stage 2, with land at lower risk of flooding (Flood Zone 1) only being considered at this stage.

Ecological and Geological sites

3.3.7 Internationally and nationally designated biodiversity sites are given high protection in national planning policy in accordance with section 5.4 of NPS EN-1 (Ref 3) and local planning policy. Special Areas of Conservation (SAC), Special Protection Areas (SPA), Ramsar Sites, Sites of Specific Scientific Importance (SSSI) and National Nature Reserves (NNR) were therefore identified and avoided.

Cultural Heritage

3.3.8 Section 5.9 of NPS EN-1(Ref 3) sets out the decision making policies for the historic environment. Paragraph 5.9.27 of NPS EN-1 places great weight on the conservation of designated heritage assets, and the more important the asset, the greater the weight.

Proximity to Dwellings

3.3.9 Paragraph 2.10.27 on NPS EN-3 (Ref 4) recognises that *"Utility-scale solar farms are large sites that may have a significant zone of visual influence"* and that the main impact issues are likely to be visual amenity and glint and glare. Therefore, urban areas and settlements were excluded from the area of search.

Other Planning and Land Use Constraints

3.3.10 Paragraph 5.11.8 of NPS EN-1 (Ref 3) states that Applicants 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". Therefore, any areas that were allocated in the relevant development plan or were designated were excluded.

3.4 Stage 3 – Identifying Potential Alternative Sites

3.4.1 Stage 3 of the site selection process identifies potential alternative sites by applying key assessment criteria for large scale solar development – site size and land assembly; and topography. The use of PDL was also considered. The following sections explain the criteria applied to the unconstrained areas identified at Stage 2.

Site Size and Land Assembly

3.4.2 Large areas of contiguous land are ideal for large scale solar development as they can be joined together as a single development, which is reflected in the substantial landholding secured at Morton Manor and Housham Grange, and there would be less cabling through third party land which increases viability and deliverability and reduces environmental impacts, such as less vegetation removal which reduces impacts on hedgerows and trees.

3.4.3 For an alternative site to be commercially viable, a conservative approach has been taken to site size, which takes into account the following factors:

a. The land area required for solar infrastructure (the energy generation hectarage) which includes solar panels, battery storage and on site substation etc.

b. The extent of environmental mitigation land that would be required given the known large numbers of ground nesting birds in Lincolnshire.

c. The ability to retain flexibility to:

   i. accommodate future innovation and technological advancements;

   ii. deliver a well-designed project with good design outcomes;

   iii. ensure sufficient land for biodiversity enhancement;

   iv. minimise and avoid impacts related to the construction of cabling;

   v. address the uncertainty regarding which bay the Proposed Development would be connecting into at the proposed National Grid substation near Navenby; and

   vi. maximise opportunities for community benefits on otherwise private land, e.g. for permissive paths and community orchards.

d. To achieve a balance between landowner requests to include more land to avoid them being left with smaller areas of land that would not be viable for other uses, whilst also ensuring that landowners are left with sufficient land to ensure that farming practices remain practical and workable in the long term.

3.4.4 Given the above, a site of approximately 1,000 hectares is required, taking into account the necessary solar infrastructure, the need for land to provide

environmental mitigation and in order to retain flexibility. 1,000 ha is the approximate land area (excluding the cable route) required to support the 240MW grid connection offer. Of this land area, approximately 475 ha would comprise the energy generation hectarage.

3.4.5 The Applicant also considered that should the alternative sites comprise a number of sites, the minimum size of at least 40ha for an individual site would be viable, however the Applicant's preference was to deliver the Proposed Development on as few land parcels, with as few landowners, as possible, to ensure the deliverability of the Proposed Development.

Topography

3.4.6 The development of large scale solar development requires relatively flat land as this is ideal for construction and helps reduce visual impact. Flat land also limits the shading between arrays and enables the panels to be configured for higher energy production levels.

3.4.7 Topographical constraints within the unconstrained areas identified at Stage 2 were also identified and mapped. All land with a 3% or less gradient which is considered to be very flat and optimal for the Proposed Development has been considered potentially suitable to meet requirements.

Previously Developed Land

3.4.8 Opportunities for solar arrays on PDL were considered and accordingly local authority brownfield land registers were consulted to identify the opportunities to utilise PDL.

3.5 Stage 4 – Evaluation of Potential Alternative Sites

3.5.1 Stage 4 then assesses the potential alternative sites which have been identified at Stage 3. The potential alternative sites were subject to a desktop assessment to further understand the constraints of these particular areas. The evaluation involved the assessment of the potential alternative sites against a range of planning, environmental and operational considerations which were developed having regard to the operational requirements of a large-scale solar development and national and local planning policy including:

a. NPS EN-1 (Ref 3);

b. NPS EN-3 (Ref 4);

c. NPS EN-5 (Ref 6);

d. The National Planning Policy Framework (NPPF), December 2024, and amended in February 2025 (Ref 7);

e. The Central Lincolnshire Local Plan, adopted in April 2023 (Ref 8);

f. Lincolnshire Minerals and Waste Local Plan including the Core Strategy and Development Management Policies Plan, adopted June 2016 (Ref 9);

g. Thorpe on the Hill Neighbourhood Plan, made in March 2018 (Ref 10);

h. Bassingham Neighbourhood Plan, made in November 2017 (Ref 11); and

i. Coleby Neighbourhood Plan, made January 2018 (Ref 12).

3.5.2 Information sources including GIS data and online mapping were used to inform the assessment. Following evaluation, each assessment criteria was ranked red, amber or green, and a statement provided to justify the categorisation.

3.6 Stage 5 – Re-introducing constraints to the area of search

3.6.1 Should it not be possible to identify an alternative site within the parameters defined for Stages 1-4, land subject to constraints was re-introduced into the area of search including Grade 3 agricultural land and land within Flood Zones 2 and 3. The same criteria identified at Stages 2 and 3 above were applied, and Grade 3 agricultural land and land within Flood Zones 2 and 3 were mapped for further consideration.

3.6.2 The availability of willing landowners is an important consideration at Stage 5 in order to assemble a site that is deliverable and meet the policy requirements in relation to compulsory acquisition. The availability of willing landowners reduces and potentially avoids the need for Compulsory Acquisition powers to be used[1]. With this in mind, and to maximise development and efficiency, the Applicant then sought to identify a principal site in as few land ownerships as practically possible within the search area. Suitable landowners were approached by the Applicant to discuss inclusion of their landholdings into the potential project.

[1] Although the vast majority of the DCO site is under option at the time of submission of the DCO application, it should be noted that the **Draft Development Consent Order [EN010154/APP/3.1]** for the Proposed Development does seek powers for compulsory acquisition. Compulsory acquisition powers are sought to clean the titles in order that they are free from any legal restrictions or encumbrances and in the unlikely event of option agreements being breached. The justification for compulsory acquisition powers is further explained in the **Statement of Reasons [EN010154/APP/4.1]**.

4. Site Selection Assessment

4.1 Stage 1 – Identification of an Area of Search

4.1.1 The area of search identified is shown in **Figure 1, Appendix C**. This shows the POC at the proposed National Grid substation near Navenby together with a 15km area of search which the Applicant considered to be a viable maximum distance from the proposed National Grid substation near Navenby for a project of this scale. The area of search was informed by and includes the extent of the land secured at Morton Manor and Housham Grange, to the north of the A46.

4.2 Stage 2 – Exclusion of Planning and Environmental Constraints

4.2.1 **Figure 2, Appendix C** shows the planning and environmental constraints identified and excluded at Stage 2 in order to identify unconstrained areas of land.

4.2.2 The ecological and geological sites excluded from the area of search included the Bardley Limewoods National Nature Reserve and SSSI, Spalford Warren SSSI, Besthorpe Warren SSSI, Besthorpe Meadows SSSI, Wilsford and Rauceby Warrens SSSI, Moor Closes SSSI, Ancaster Valley SSSI, Copper Hill SSSI, Metheringham Heath Quarry SSSI, Potterhanworth Wood SSSI and Greetwell Hollow Quarry SSSI in the south of the search area.

4.2.3 Urban areas such as Lincoln, North Hykeham, Sleaford and Newark on Trent and smaller settlements such as Navenby, Witham St Hughs, Bassingham, Thorpe on the Hill, Waddington, Leasingham and Ruskington were excluded from consideration.

4.2.4 The Waddington to Bracebridge Heath Green Wedge and Lincoln Cliff Area of Great Landscape Value were excluded in order to help minimise the landscape impacts of the Proposed Development.

4.2.5 **Figure 2, Appendix C** indicates that there are large areas of Flood Zone 3 at the eastern edge of the search area and areas of Flood Zones 2 and 3 to the south of North Hykeham, associated with the River Witham.

4.2.6 **Figure 3, Appendix C,** and **Figure 4, Appendix C** show the Agricultural Land Classification of the area including BMV land. As can be seen from **Figure 3, Appendix C,** and **Figure 4, Appendix C** the area to the east of the POC is largely categorised as grade 2 BMV land. The area to the west is largely Grade 3 BMV land. There are only a few areas of Grade 4 (non-BMV) land within the search area, and these are generally within settlements. There are no areas of Grade 1 BMV land within the area of search.

4.2.7 **Figure 5, Appendix C** shows the output from this mapping, identifying areas of unconstrained land which have not been excluded at Stage 2.

4.3 Stage 3 – Identifying Potential Alternative Sites

4.3.1 As demonstrated by **Figure 5, Appendix C**, there are a number of areas within the 15km search area which are unconstrained and 40ha or over in size.

4.3.2 **Figure 6, Appendix C** shows the topography of the area. As shown in this figure, the majority of land within the 15km area of search has a gradient of 3% or less and therefore site selection was not constrained by topography.

4.3.3 An assessment of PDL within the area of search was undertaken which includes land within the boundaries of North Kesteven District Council, South Kesteven District Council, East Lindsey District Council, West Lindsey District Council and the City of Lincoln Council. The latest data for these councils is contained within the relevant brownfield registers as set out below:

a. North Kesteven District Council - Brownfield Land Register (2017) (Ref 13);
b. South Kesteven District Council - Brownfield Register (No Date) (Ref 16Ref 16);
c. East Lindsey District Council - Brownfield Register (No Date) (Ref 17);
d. West Lindsey District Council - Brownfield Register (2024) (Ref 18); and
e. City of Lincoln Council - Brownfield Register (No date) (Ref 15).

4.3.4 **Table 5-1** below contains details of the three brownfield sites within the search area that are 1ha and above in size. Sites smaller than 1ha were discounted due to their inability to provide a viable land parcel of 40ha, either individually or when combined with other brownfield sites.

4.3.5 Of the 3 sites over 1 ha in size, none of the sites are large enough to provide a viable land parcel of at least 40ha, therefore no individual brownfield site from the register provides an adequate area to facilitate a large scale solar project over 50MW. Furthermore, 2 of the 3 sites have planning permission for residential development or for residential/mixed use development.

4.3.6 The search of PDL therefore identified no land of sufficient size to facilitate a large scale solar project either individually or in combination with other sites.

Table 4-1: Previoulsy Developed Land from the Relevent Brownfield Registers

Site Ref	Location:	Size (ha)	Grid Reference	Comments	Local Planning Authority
CL525	Former Central Electricity Generating Board power station, Spa Rd, Lincoln LN2 5TB	5.7	SK 98788 71168	No planning permission has been granted. The Brownfield Register states that "*the sites are suitable and available for*	City of Lincoln

Site Ref	Location:	Size (ha)	Grid Reference	Comments	Local Planning Authority
				housing-led development".	
BLR/0008	Land at St John's Hospital, Goddard Way, Bracebridge Heath, Lincoln, LN4 2UT	6.9	SK 98170 67674	Reserved Matters approved for residential development on15 November 2017 (Reference: 17/1081/FUL).	North Kesteven District Council
BLR/0002	Land off Moor Lane, Swinderby, Lincoln, LN6 9LX	8.29	SK 87216 63049	Planning permission approved for mixed residential and commercial development comprising 132 dwellings on 16 February 2024 (Reference: 22/1376/FUL)	North Kesteven District Council

4.3.7 **Figure 7, Appendix C** shows the PDL over 1 ha within the area of search which has been identified using the relevant council's brownfield registers. As set out above, none of the sites identified are suitable. Therefore, PDL sites were not considered further.

4.4 Stage 4 – Evaluation of Potential Alternative Sites

4.4.1 **Figure 8, Appendix C** shows areas of land, either 40 ha or over, that are unconstrained. The results show that there are 5 potential alternative sites. Only Site 3, shown on **Figure 8, Appendix C,** has been carried forward for further assessment. Sites 1, 2, 4 and 5 have been discounted for the following reasons:

a. Site 1- has been discounted due to its irregularity of shape and size (i.e. areas that are irregular in shape and/or cannot easily be joined to other sites resulting in impacts to design feasibility) and because it contains numerous roads which significantly reduces the remaining available land. Site 1 is also almost entirely located within woodland.

b. Site 2- has been discounted as it is within and surrounds RAF Waddington which is an operational airfield. The site is also irregular in shape and the A15 intersects the eastern parcel.

c. Site 4- has been discounted due to its irregularity of shape and small size. Site 4 is not located in close proximity to other sites, therefore could not feasibly be combined with other sites.

d. Site 5- has been discounted as it is within and entirely surrounds the village of Cranwell, to the north of the A17, where RAF Cranwell, an airfield (with runway), and RAF flight and officer training academy is located. The site is also irregular in shape.

4.4.2 **Figure 9, Appendix C** shows the potential alternative sites mapped against various environmental constraints. Site 3 was then assessed against a range of planning, environmental and operational considerations (a list of considerations and the assessment methodology applied appears at **Appendix A**). **Table D-1, Appendix D** sets out the results of the assessment and the rating (red, amber or green) given to Site 3 for each of the categories assessed. A summary of the results, including details on why the site was discounted, are included below.

Site 3: Hadwin's Wood

4.4.3 Site 3 comprises a cluster of three flat land parcels near Hawdins Wood totalling approximately 385ha.

4.4.4 Whilst Site 3 is well located in terms of the strategic road network providing good access for construction traffic, and is relatively flat which is beneficial for solar, the major constraint identified is Hawdin's Wood, which is located immediately to the east of the central parcel of Site 3 and is designated as Ancient Woodland, covering a substantial area. There is a further large area of Ancient Woodland located to the south of the southernmost parcel of Site 3. Furthermore, the majority of the southern parcel of Site 3 is located in Stapleford Woods which comprises woodland likely to support notable species, such as bats. The location of Stapleford Woods would also result in significant shading to any solar development in this area.

4.4.5 Site 3 is partially located on a disused RAF airfield, RAF Swinderby, which closed in 1993. Since then a number of planning applications have been submitted and approved in relation to this land. The most relevant are the following:

a. An application under reference PL/0153/15 for a logistics compound for parking of heavy commercial vehicles, office accommodation, mess room facilities, and car park was submitted and approved in 2016 by Lincolnshire County Council. It would appear from satellite imagery that this development has been constructed.

b. Several applications in relation to the extraction of sand and gravel from part of the airfield have been made to Lincolnshire County Council. Notably application reference PL/0048/08 was approved in 2011 for the extraction of sand and gravel involving the erection of processing, reading mix concrete, mortar and recycling plant and the siting of associated infrastructure. Additionally, in 2014 the application PL/0259/13 for the construction of a workshop and compound for ancillary use of sand and gravel extraction was approved. This forms an existing use on site.

c. There are a number of applications for residential development approved and constructed to the east of RAF Swinderby.

4.4.6 In addition to there being an existing minerals site at RAF Swinderby, parts of RAF Swinderby are allocated in the Lincolnshire Minerals and Waste Local Plan (adopted June 2016) (the Minerals and Waste Local Plan) (Ref 9) as a minerals site, and a site specific minerals safeguarding area. The aim of both allocations in the Minerals and Waste Local Plan is to safeguard the sites from development that would unnecessarily sterilise them for future minerals extraction. Given RAF Swinderby has been developed for a range of uses including quarrying, residential, and industrial activities, and is allocated in the Minerals and Waste Local Plan, this parcel of Site 3 would not be available to accommodate the Proposed Development.

4.4.7 There are heritage assets located within and around Site 3. Whilst this could be addressed by providing appropriate buffers to mitigate impacts to these assets, that would minimise the area for solar development. In addition, there are small areas of high risk from surface water flooding and the cable route corridor to connect Site 3 to the POC would involve crossing two main rivers, the Brant and Witham.

4.4.8 The size of Site 3 is approximately 385ha, which is not large enough to accommodate the Proposed Development. Furthermore, it is isolated from other potential alternative sites, therefore could not feasibly be combined with other sites.

4.4.9 In conclusion, due to the presence of Ancient Woodland adjacent to the site, RAF Swinderby not being available, and Site 3 being too small on its own to deliver the Proposed Development, Site 3 was discounted and not considered further.

4.5 Stage 5 – Re-introducing constraints to the area of search

4.5.1 Following Sites 1 to 5 being discounted; consideration was then given to re-introducing Grade 3 agricultural land and areas of Flood Zones 2 and 3 back into the 15km area of search. At this stage, due to there being large areas of unconstrained land, the availability of willing landowners was also considered. By having sites with only one or two willing landowners, this reduces the need for Compulsory Acquisition powers to be used. Four potential alternative sites were identified at Stage 5 following engagement with local landowners.

4.5.2 **Figure 10, Appendix C** shows the environmental constraints, excluding Grade 2 agricultural land and including land within Flood Zones 2 and 3.

4.5.3 **Figure 11, Appendix C** shows the output from this mapping, identifying areas of less constrained land.

4.5.4 **Figure 12 Appendix C** shows the large scale land ownerships identified as being potentially available/suitable for large scale solar development.

4.5.5 **Figure 13, Appendix C** provides a more detailed view of each of the 4 potential alternative sites mapped against various environmental constraints.

4.5.6 **Table D-2, Appendix D** sets out the results of the assessment and the rating (red, amber or green) given to Sites 6, 7, 8 and 9 for each of the categories assessed. A summary of the results is set out below.

Site 6: Harmston

4.5.7 Site 6 comprises a cluster of four flat land parcels in close proximity to the villages of Aubourn, Harmston, Waddington and Coleby, totalling approximately 650 ha. Whilst the topography of the site is suitable for solar development, part of the site is located within and adjacent to the Lincoln Cliff Area of Great Landscape Value and the whole site is intersected by a number of Public Rights of Way. Residential Receptors are located within the villages of Coleby, Harmston and Aubourn, and the south eastern extent of Site 6 surrounds the village of Coleby. Site 6 is located predominantly on Grade 3 agricultural land however, within the eastern most parcel of Site 6 there is an area of Grade 2 agricultural land which is classified as 'best and most versatile'.

4.5.8 Whilst there are no listed buildings located within Site 6, there are a number of listed buildings located within Coleby and the Somerton House Scheduled Monument is located to the south west. Given the need for appropriate buffers to minimise impacts to Somerton House, the area for solar development would be reduced. In terms of access for construction traffic, whilst Site 6 is largely accessible from the A607 and A15, mitigation would likely be required due to the need for construction traffic to use minor roads to access the site. The most eastern parcel of Site 6 is located in an area of Flood Zone 3 which minimises the extent to which solar can be delivered given infrastructure such as battery storage and substations could not be located within these areas albeit it is noted that the extent of Flood Zone 3 is less than Site 9.

4.5.9 There is an area of woodland located within the western parcel of Site 6, and given the River Brant also passes through this parcel the area is likely to support notable species such as bats and riparian mammals such as otters. In addition, areas of woodland in the western parcel of Site 6 would create shading, therefore the extent of solar infrastructure that could be constructed in these areas would be reduced.

4.5.10 The size of Site 6 is approximately 650 ha and on its own the site would not be large enough to accommodate the Proposed Development. It is however in close proximity to Sites 7, 8 and 9 so could potentially be combined with another site. However, this would cause Site 6 to be fragmented with multiple land ownerships which is not preferable given the Applicant's preference to minimise the use of compulsory acquisition.

4.5.11 In conclusion, given the landscape, heritage, shading and flood risk constraints outlined above, which reduce the amount of land available for the construction of solar infrastructure combined with the site size, Site 6 was not considered a viable option for the Proposed Development and was subsequently discounted.

Site 7: Bassingham Fen

4.5.12 Site 7 comprises a cluster of ten flat land parcels near Bassingham Fen, with scattered residential properties located throughout, totalling approximately 790 ha. Whilst there are limited areas of woodland resulting in minimal solar array shading and the topography of the land is suitable, there are a number of Grade II listed buildings within the north eastern parcel, associated with Somerton Castle and clusters of Grade II Listed Buildings within Bassingham. The 'Somerton House' Scheduled Monument is located within the western most parcel of Site 7. Appropriate mitigation and buffers would be needed to avoid impacting this heritage asset and its setting, which would reduce the feasible area for solar infrastructure particularly in the north eastern part of the site. In addition, the majority of Site 7 is located within Flood Zones 2 and 3 which minimises the extent to which solar can be delivered given infrastructure such as batteries and substations should not be located within these areas. Part of Site 7 is also located within a water storage area.

4.5.13 The majority of Site 7 is located on Grade 3 agricultural land and there are some areas of Grade 2 land within the southern-most and central parcels which is classified as 'best and most versatile' land. Site 7 is not located within or in close proximity to a National Landscape designation, however, the eastern extents of Site 7 are located within 1km of the Lincoln Cliff Area of Great Landscape Value.

4.5.14 Similar to Site 6, in terms of access for construction traffic, Site 7 is largely accessible from the A607 and A15, mitigation would likely be required due to the need for construction traffic to use minor roads to access the site.

4.5.15 The size of Site 7 is approximately 790 ha and on its own Site 7 would not be large enough to accommodate the Proposed Development. It is however in close proximity to Sites 6, 8 and 9 so could potentially be combined with another site. However, similar to Site 6, this would cause Site 7 to be fragmented with multiple land ownerships which is not preferable given the Applicant's preference to minimise the use of compulsory acquisition.

4.5.16 In conclusion, given the heritage and flood risk constraints identified above, and the large number of land parcels associated with Site 7, the site was not considered a viable option for the Proposed Development and was subsequently discounted.

Site 8: Scopwick Heath

4.5.17 Site 8 comprises a cluster of four flat land parcels near Scopwick Heath totalling approximately 1,920 ha. Of all the sites assessed at this stage, Site 8 is located closest to the POC at the proposed National Grid substation near Navenby. The western parcels of Site 8 are located in close proximity to the villages of Navenby, Boothby Graffoe and Wellingore and the eastern parcels are located in close proximity to Scopwick and Ashby-de-la-Launde. Whilst Site 8 has suitable access for construction traffic via the A15, is mainly located in Flood Zone 1, has limited areas of woodland resulting in minimal solar array shading and the topography of the land is suitable, the vast majority of Site 8 east of Navenby (The Heath) is Grade 2 agricultural land which is classified as 'best and most versatile'. As stated within Paragraph 2.10.29 of NPS EN-3

(Ref 4) *"Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of 'Best and Most Versatile' agricultural land where possible"* (Ref 4).

4.5.18 The western extents of Site 8 border the Lincoln Cliff Area of Great Landscape Value, and the site is intersected by a number of Public Rights of Way, particularly within the southern land parcel. Residential Receptors are located within the villages of Navenby, Wellingore, Boothby Graffoe, Scopwick and Ashby-de-la-Launde, which are in close proximity to the site. In addition, the site borders RAF Digby at the southern eastern extent of the site, which is an operational airfield, as shown in **Figure 13, Appendix C**. It has also since been identified that Site 8 now overlaps with the location of the proposed Leoda and Springwell Solar Farms, as shown in **Figure 14, Appendix C**.

4.5.19 Site 8 contains some scattered woodland which may support ground nesting birds. There is one heritage asset within Site 8 and several listed buildings in Scopwick to the east, some of which are immediately adjacent to the site boundary. Appropriate mitigation and buffers would be needed to avoid impacting these heritage assets, which would reduce the feasible area for solar infrastructure.

4.5.20 In terms of site size, Site 8 is large enough to accommodate the proposed development, however the site is made up of many land parcels which is not preferable from a land acquisition and assembly perspective.

4.5.21 In conclusion, given that Site 8 is located almost entirely on Grade 2 agricultural land, which should be avoided in accordance with NPS EN-1 (Ref 3) and NPS EN-3 (Ref 4), is adjacent to RAF Digby, an operational airfield, and the Lincoln Cliff Area of Great Landscape Value, Site 8 was not considered a viable option for the Proposed Development, and was subsequently discounted.

Site 9: Fosse Green (The Proposed Development)

4.5.22 Site 9 comprises one large land parcel near Witham St Hughs totalling approximately 1,070 ha. Site 9 is located in close proximity to the villages of Thorpe on the Hill, Witham St Hughs, Bassingham, Aubourn and Boothby Graffoe. There is a caravan park immediately adjacent to the northern section of Site 9 and several scattered residential properties located throughout the site. The site is intersected by multiple Public Rights of Way and bridleways. Of all the sites assessed, Site 9 is located furthest away from the POC, at approximately 10km.

4.5.23 Site 9 has suitable access from the strategic and local road network for construction traffic via the A46 and A15 and there are limited areas of woodland, apart from Tunman Wood to the north of the site, reducing the extent of solar array shading. The topography of Site 9 is suitable for solar development and the vast majority of the area of Site 9 is Grade 3 agricultural land with some areas showing to be Grade 2 land which is classed as 'best

and most versatile' land[2]. Compared with Site 8, the area of Grade 2 land is significantly less and therefore preferred.

4.5.24 Site 9 is located adjacent to Tunman Wood, an area of Ancient Woodland, and there are some scattered trees within the site. The majority of Site 9 is located within Flood Zone 1; however parts are located within Flood Zones 2 and 3. However, compared with Sites 6 and 7, areas of Flood Zone 2 and 3 are significantly less. A single Grade II listed building is located within a land parcel excluded from, but surrounded by, Site 9 and there are other listed buildings in proximity. The 'Hall Close' Scheduled Monument is located immediately east of the eastern extent of Site 9. Due to the heritage constraints present within and adjacent to Site 9, appropriate mitigation and buffers would be needed to avoid impacting these heritage assets, which would reduce the feasible area for solar infrastructure.

4.5.25 In terms of site size, Site 9 is considered to be of sufficient size to accommodate the Proposed Development and unlike Sites 6 and 7, Site 9 comprises a contiguous site, with relatively few land ownerships.

4.5.26 In conclusion, whilst noting the heritage and flood risk constraints above that would have the potential to reduce the feasible area for solar infrastructure, there are no major constraints identified which would render Site 9 unviable for the Proposed Development. Further, sufficient land was made available by a small number of landowners to accommodate the Proposed Development which aligns with the Applicant's approach to secure land under option to reduce the need to rely upon Compulsory Acquisition powers. Further details on compulsory acquisition can be found within the **Statement of Reasons [EN010154/APP/4.1]**. On this basis, Site 9 represented the preferred location for the Proposed Development, and was taken forward by the Applicant to the next stage of design development.

[2] Agricultural Land Classification surveys have subsequently shown that there is no Grade 2 agricultural land in Site 9, as reported in **Appendix 12-B: Agricultural Land Classification Report** of the ES **[EN010154/APP6.3]**.

5. Conclusion

5.1.1 Given the identification of the site was driven by the availability of deliverable land and site suitability in accordance with the requirements of policy, and in recognition of the need to consider reasonable alternatives, this SSR has followed a five-stage approach to confirm that the location for the Proposed Development is suitable when compared with potential alternative sites. The SSR sets out the potential alternative sites considered which have been assessed against a range of planning, environmental and operational criteria.

5.1.2 Initially, the Applicant submitted an application to National Grid for a potential line in and line out connection into the 400kV Overhead Line close to Whisby Hall. However, National Grid informed the Applicant that the connection was not available and instead the Applicant secured a POC at the proposed National Grid substation near Navenby.

5.1.3 Stage 1 of the site selection process identified a 15km area of search from the POC at the proposed National Grid substation near Navenby, which was informed by the extent of the land secured at Morton Manor and Housham Grange, to the north of the A46. Stages 2 and 3 of the assessment resulted in the identification of 5 potential alternative sites on areas of grade 4, 5 and unclassified land and outside of Flood Zones 2 and 3. Four of these (Sites 1, 2, 4 and 5) were discounted as they were not suitable. Following the Stage 4 assessment of Site 3, it was concluded that Site 3 was not suitable to accommodate the Proposed Development due to a variety of constraints including the presence of Ancient Woodland adjacent to the site; RAF Swinderby not being available due to existing commercial, mineral extraction and residential uses; and Site 3 being too small on its own to deliver the Proposed Development.

5.1.4 On the basis that none of the initial potential alternative sites identified were suitable for the Proposed Development, previously discounted Grade 3 agricultural land and Flood Zones 2 and 3 were re-introduced back into the 15km area of search and the availability of willing landowners was also considered. This resulted in the identification of 4 further potential alternative sites including the site of the Proposed Development. The Stage 5 assessment confirms that the location of the Proposed Development, is more suitable than the other potential alternative sites as there were no major constraints identified which would render Site 9 unviable when compared to other sites, and the land is held in relatively few land ownerships and as such was preferable from a land acquisition and assembly perspective.

5.1.5 In conclusion, it is considered that the location of the Proposed Development comprises a suitable site taking into account planning and environmental constraints and operational considerations. The location of the Proposed Development is therefore assessed as being suitable to deliver the Proposed Development and the basis on which the Applicant has selected the site accords with the consideration of site selection as set out in NPS EN-1 (Ref 3) and NPS EN-3 (Ref 4).

6. References

Ref 1 HM Government (1990). Town and Country Planning Act 1990. Available at: Town and Country Planning Act 1990 [Accessed 15/03/2025]

Ref 2 HM Government (2008). Planning Act 2008. Available at: https://www.legislation.gov.uk/ukpga/2008/29/contents?lang=en [Accessed 17/12/2024]

Ref 3 Department for Energy Security and Net Zero (2023). Overarching National Policy Statement for energy (EN-1). Available at: https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1 [Accessed 17/12/2024]

Ref 4 Department for Energy Security and Net Zero (2023). National Policy Statement for electricity networks infrastructure (EN-3). Available at: https://www.gov.uk/government/publications/national-policy-statement-for-renewable-energy-infrastructure-en-3 [Accessed 13/03/2025]

Ref 5 Secretary of State for Energy Security and Net Zero (2024). Solar and protecting our Food Security and Best and Most Versatile (BMV) Land. Available at: https://questions-statements.parliament.uk/written-statements/detail/2024-05-15/hcws466 [Accessed 16/04/2025]

Ref 6 Department for Energy Security and Net Zero (2023). National Policy Statement for electricity networks infrastructure (EN-5). Available at: https://www.gov.uk/government/publications/national-policy-statement-for-electricity-networks-infrastructure-en-5 [Accessed 17/12/2024]

Ref 7 Ministry of Housing, Communities and Local Government, Ministry of Housing, Communities & Local Government (2018 to 2021) and Department for Levelling Up, Housing and Communities (2024) (Amended 2025). National Planning Policy Framework. Available at: https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf [Accessed 14/03/2025]

Ref 8 North Kesteven District Council (2023). Central Lincolnshire Local Plan. Available at: https://www.n-kesteven.gov.uk/sites/default/files/2023-04/Local%20Plan%20for%20adoption%20Approved%20by%20Committee.pdf [Accessed 13/03/2025]

Ref 9 Lincolnshire County Council (2016). Lincolnshire Minerals and Waste Local Plan Core Strategy and Development Management Policies. Available at: Lincolnshire Minerals and Waste Local Plan [Accessed 13/03/2025]

Ref 10 North Kesteven District Council (2019). Thorpe on the Hill Neighbourhood Plan 2016-2036. Available at: https://www.n-kesteven.gov.uk/sites/default/files/2023-01/neighbourhood_plan_thorpe_on_the_hill.pdf [Accessed 17/06/2025]

Ref 11 Bassingham Parish Council (2017). Bassingham Neighbourhood Plan 2016-2036. Available at: https://www.n-

kesteven.gov.uk/sites/default/files/2023-01/bassingham_neighbourhood_plan.pdf [Accessed 17.12.2024]

Ref 12 Coleby Parish Council (2018). Coleby Parish Neighbourhood Plan 2018-2036. Available at: https://www.n-kesteven.gov.uk/sites/default/files/2023-01/coleby_neighbourhood_plan.pdf [Accessed 17.12.2024]

Ref 13 North Kesteven District Council (2017). North Kesteven District Council Brownfield Land Register. Available at: https://www.n-kesteven.gov.uk/planning-building/planning/planning-policy/brownfield-land-register [Accessed 13/03/2025]

Ref 14 Newark and Sherwood District Council (2025). Newark and Sherwood District Council Brownfield Land Register. Available at: https://www.newark-sherwooddc.gov.uk/brownfieldlandregister/ [Accessed 25/03/2025]

Ref 15 City of Lincoln Council (No date). City of Lincoln Brownfield Register. Available at: https://maps.lincoln.gov.uk/WebMapLayers8/Map.aspx?x=497500&y=370330&resolution=10&epsg=27700&mapname=planning&baseLayer=BackgroundMaps&datalayers=BackgroundMaps%2CBrownfield%20Land%20Register%2CselectFeaturesControl_container [Accessed 13/03/2025]

Ref 16 South Kesteven District Council (No Date). South Kesteven District Council Brownfield Register. Available at: https://www.southkesteven.gov.uk/sites/default/files/2024-12/Brownfield_Land_Register_%28Final-CSV%29.csv [[Accessed 13/03/2025]

Ref 17 East Lindsey District Council (No Date). East Lindsey District Council Brownfield Register (No Date). Available at: https://www.e-lindsey.gov.uk/media/26446/ELDC-Brownfield-Register-2024-2025/pdf/ELDC_Brownfield_Register_-_2024-2025.pdf?m=1736337651930. Accessed [13/03/2025]

Ref 18 West Lindsey District Council (2024) West Lindsey District Council Brownfield Register. Available at: https://www.west-lindsey.gov.uk/sites/default/files/2022-10/brownfield-land.csv. [Accessed 13/03/2025]

Ref 19 The Infrastructure Planning (Environmental Impact Assessment) Regulations (2017). Available at: https://www.legislation.gov.uk/uksi/2017/572 [Accessed 21 March 2025].

7. Abbreviations

Table 7-1: Abbreviations

Abbreviation	Definition
ALC	Agricultural Land Classification
BESS	Battery Energy Storage System
BMV	Best and Most Versatile
CNP	Critical National Priority
DCO	Development Consent Order
GIS	Geographical Information Systems
ha	Hectares
kV	Kilovolt
km	Kilometre
MW	Megawatts
NNR	National Nature Reserve
NPS	National Policy Statement
NSIP	Nationally Significant Infrastructure Project
POC	Point of Connection
PDL	Previously Developed Land
PV	Solar Photovoltaic
SAC	Special Areas of Conservation
SPA	Special Protection Area
SSSI	Sites of Special Scientific Importance
SSR	Site Selection Report

Appendix A: Assessment Indicators and Evaluation Criteria

A.1.1 The assessment indicators set out below are considered in the assessment of potential alternative sites set out in Appendix D: Site Assessment Results of this report. The tables provided for each assessment indicator inform the RAG rating, with the red rating being the most constrained, and the green rating being the least.

Land Use

A.1.2 Assessment Indicator: Does the potential site have any existing land uses/land ownership constraints/development allocations/safeguarded areas/extant planning permissions which would potentially conflict with the proposed development having regard to the following evaluation criteria?

- Land ownership constraints such as multiple land owners/the need for compulsory acquisition
- Best and most versatile agricultural land
- Number and type of existing land uses within and adjacent to the potential site
- Extant planning permissions within the potential site
- Local plan/emerging local plan development allocations within the potential site
- Number and location of public rights of way within the potential site
- Proximity to urban areas

	The potential site has the potential to conflict with a large number of uses, extant planning permissions and policy allocations which would be difficult to avoid.
	The potential site has the potential to conflict with existing land uses, extant planning permissions and policy allocations which can be avoided.
	The potential site has no land use conflicts.

Grid Connection

A.1.3 Assessment Indicator: Is the potential site's grid connection likely to encounter constraints e.g. crossing of roads, rivers and railways and sensitive environmental designations and require significant land take? The assessment will consider:

- Type and number of constraints and designations
- Length of connection

	The potential site has potential to have significant constraints to achieve its grid connection which would be very difficult to mitigate/overcome.
	The potential site has potential to have some constraints to achieve its grid connection.

	The potential site is unlikely to encounter any constraints to achieve its grid connection.

Ecological and Geological

A.1.4 Assessment Indicator: Is the potential site likely to adversely impact any (a) internationally, nationally or locally designated site of ecological, biological or geological importance, (b) protected species, (c) habitats identified as being of principal importance for the conservation of biodiversity having regard to the following evaluation criteria?

- Proximity of designated sites
- Level of designation and sensitivity of those designated sites
- Potential for provision of mitigation measures

	The potential site has potential to have a significant adverse impact on (a) an internationally, nationally or locally designated site of ecological, biological or geological importance, (b) protected species, (c) habitats identified as being of principal importance for the conservation of biodiversity, which may be difficult to mitigate.
	The potential site has potential for some adverse impact on (a) an internationally, nationally or locally designated site of ecological, biological or geological importance, (b) protected species, (c) habitats identified as being of principal importance for the conservation of biodiversity, which could be mitigated through appropriate buffers and management measures.
	The potential site is unlikely to impact upon on (a) an internationally, nationally or locally designated site of ecological, biological or geological importance, (b) protected species, (c) habitats identified as being of principal importance for the conservation of biodiversity.

Landscape and Visual

A.1.5 Assessment Indicator: Is the potential site likely to adversely impact a locally or nationally designated landscape, or sensitive viewpoints, having regard to the following evaluation criteria?

- Proximity of the potential site from locally or nationally designated landscape, or sensitive viewpoints
- Sensitivity and number of locally or nationally designated landscape, or potentially sensitive viewpoints such as from public rights of way or other public locations
- Proximity of the potential site from local community receptors
- Potential for provision of screening or other mitigation measures

	The potential site has the potential to have a significant adverse impact on a locally or nationally designated landscape, or important/sensitive viewpoints, which may be difficult to mitigate.
	The potential site has potential to have some adverse impact on a locally or nationally designated landscape, or important/sensitive viewpoints, which may be difficult to mitigate.

	The potential site is unlikely to have an adverse impact a locally or nationally designated landscape, or important/sensitive viewpoints, other than one which is unlikely to be difficult to mitigate.

Cultural Heritage

A.1.6 Assessment Indicator: Is the potential site likely to adversely impact designated heritage assets, having regard to the following evaluation criteria?

- Proximity to designated heritage assets
- Level and sensitivity of designated heritage assets
- Potential for screening the potential site from the asset

	The potential site has potential to cause harm to a large number of designated heritage assets, which may be difficult to avoid and mitigate.
	The potential site has potential to cause harm to a large number of designated heritage assets but could incorporate mitigation e.g. buffers/screening or has potential to cause harm to a small number of designated heritage assets which may be difficult to mitigate/avoid.
	The potential site is likely to cause harm to a small number of designated assets and can incorporate appropriate buffers/mitigation measures to reduce impacts.

Access for Construction Traffic

A.1.7 Assessment Indicator: Is the road network, from the strategic road network to the potential site, suitable for HGV access, having regard to the following evaluation criteria?

- General suitability of the public highway
- Distance to the strategic road network
- Sensitivity of land uses along the route to the primary road network
- Physical or engineering constraints (bridges, level crossings, visibility, access points etc.)
- Access to fields without having to remove hedgerows

	The local road network has significant constraints to HGV access.
	The local road network has some constraints to HGV access.
	The local road network is suitable for HGV access.

Flood Risk

A.1.8 Assessment Indicator: Is the potential site likely to be constrained by the risk of flooding, having regard to the following factors?

- Proximity to nearby watercourses
- Proportion of the potential site within Flood Zone 2 or 3

	The majority of the potential site is within an area with moderate or significant risk of flooding.

	The majority of the potential site is within an area with no or low risk of flooding, but part of the area is within an area with moderate or significant risk of flooding.
	The potential site is entirely within an area with no or low risk of flooding.

Solar Array Shading

A.1.9 Assessment Indicator: Is the potential site likely to be constrained by features which would affect irradiance levels and result in shading having regard to the following factor?

- Type and coverage (number) of features that might shade e.g. trees/woodland

	The potential site has field boundary features which are likely to significantly constrain the solar array design.
	The potential site has field boundary features which are likely to moderately constrain the solar array design.
	The potential site has field boundary features which are unlikely to constrain the solar array design.

Topography

A.1.10 Assessment Indicator: Is the potential site affected by an undulating terrain of multiple gradients? The assessment will consider:

- The proportion of the potential site that is undulating/has varied topography

	The terrain of the potential site is likely to significantly constrain the solar array design.
	The terrain of the potential site is likely to moderately constrain the solar array design.
	The terrain of the potential site is unlikely to constrain the solar array design.

Site Size

A.1.11 Assessment Indicator: Is the potential site of sufficient size to accommodate the Proposed Development or would it need to be combined with other sites. The assessment will consider:

- Whether the site provides sufficient land to accommodate the Proposed Development

	The potential site does not provide sufficient land to accommodate the Proposed Development and is too isolated from other potential alternative sites that could be linked.
	The potential site does not provide sufficient land to accommodate the Proposed Development but is close to other potential alternative sites that could be linked.
	The potential site provides sufficient land to accommodate the Proposed Development.

Appendix B: Relevant National and Local Planning Policy

Table B-1: Relevant National and Local Planning Policy

Assessment Indicator	Justification	Relevant National Policy	Relevant Local Policy
Land Use	To minimise impacts upon best and most versatile agricultural land, existing land uses, extant planning permissions, current and emerging allocations, Public Rights of Way, residential amenity and Mineral Safeguarding Areas.	**NPS EN-1 – Section 5.11 Land Use, Including Open Space, Green Infrastructure, and Green Belt** Paragraphs, 5.11.1, 5.11.3, 5.11.8, 5.11.12, 5.11.15, 5.11.17 and 5.11.30. **NPS EN-3 – Section 2.10 Solar Photovoltaic Generation** Paragraphs 2.10.11, 2.10.27, 2.10.29 and paragraphs 2.10.40 to 2.10.45. **NPPF** Paragraphs 105, 198 and 224.	**Central Lincolnshire Local Plan** Policy S67: Best and Most Versatile Agricultural Land Policy S14: Renewable Energy Policy S48: Walking and Cycling Infrastructure Policy S53: Design and Amenity Policy S54: Health and Wellbeing **Lincolnshire Minerals and Waste Local Plan including the Core Strategy and Development Management Policies Plan** Policy M11: Safeguarding of Mineral Resources **Thorpe on the Hill Neighbourhood Plan** Policy 4: Green Spaces and Green Infrastructure **Bassingham Neighbourhood Plan** Policy T1: Transport considerations in new development Policy ES5: Renewable Energy Schemes **Coleby Neighbourhood Plan** Policy 5: Access to the Countryside
Grid Connection	To assess potential constraints of the grid connection, such as roads, rivers, railways and sensitive environmental designations.	**NPS EN-1 – Section 4.11 Network Connection** Paragraphs 4.11.2, 4.11.5, and 4.11.12. **NPS EN-3 – Section 2.10 Solar Photovoltaic Generation** Paragraphs 2.10.24, 2.10.25 and 2.10.60. **NPS EN-5 – Section 2.2 Factors influencing site selection and design** Paragraphs 2.2.2, 2.2.7, 2.2.8 and 2.2.9. **NPPF** Paragraph 87.	**Central Lincolnshire Local Plan** Policy S14: Renewable Energy
Ecological and Geological	To assess impacts on any internationally or nationally designated sites of ecological, biological or geological importance, protected species, habitats or other species identified as being of principal importance for the conservation of biodiversity.	**NPS EN-1 – Section 5.4 Biodiversity and Geological Conservation** Paragraphs 5.4.4, 5.4.5, 5.4.7, 5.4.8, 5.4.12, 5.4.14, 5.4.15 and 5.4.16.	**Central Lincolnshire Local Plan** Policy S14: Renewable Energy Policy S59: Green and Blue Infrastructure Network Policy S60: Protecting Biodiversity and Geodiversity

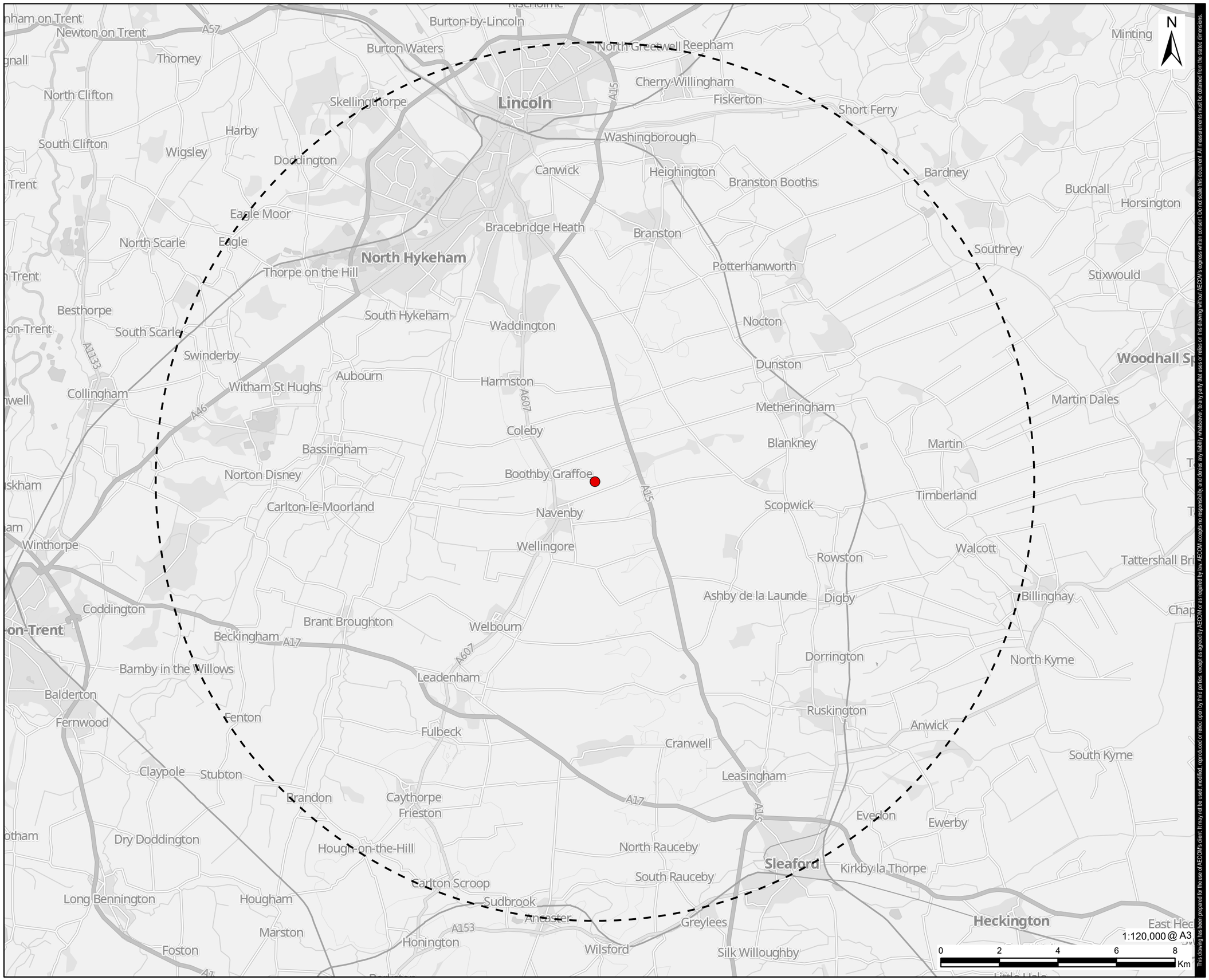
Assessment Indicator	Justification	Relevant National Policy	Relevant Local Policy
		NPS EN-1 – Section 5.11 Land Use, Including Open Space, Green Infrastructure, and Green Belt Paragraph 5.11.27. **NPS EN-3 – Section 2.10 Solar Photovoltaic Generation** Paragraph 2.10.77. **NPS EN-5 - Section 2.2 Factors influencing site selection and design** Paragraph 2.2.10. **NPPF** Paragraphs 187, 193 and 194.	Policy S61: Biodiversity Opportunity and Delivering Measurable Net Gains **Thorpe on the Hill Neighbourhood Plan** Policy 3: Biodiversity
Landscape and Visual	To assess how the potential site may impact nationally designated landscapes such as National Parks and National Landscapes, in addition to locally designated landscapes.	**NPS EN-1 – Section 5.10 Landscape and Visual** Paragraphs 5.10.5, 5.10.6, 5.10.7, 5.10.12 and 5.10.19 **NPS EN-3 – Section 2.10 Solar Photovoltaic Generation** Paragraph 2.10.96. **NPS EN-5 - Section 2.2 Factors influencing site selection and design** Paragraph 2.2.10. **NPPF** Paragraphs 187, 189 and 190.	**Central Lincolnshire Local Plan** Policy S14: Renewable Energy Policy S58: Protecting Lincoln, Gainsborough and Sleaford's Setting and Character Policy S59: Green and Blue Infrastructure Network Policy S62: Area of Outstanding Natural Beauty and Areas of Great Landscape Value Policy S63: Green Wedges Policy S66: Trees, Woodland and Hedgerows **Thorpe on the Hill Neighbourhood Plan** Policy 4: Green Spaces and Green Infrastructure Policy 5: Landscape and Views **Bassingham Neighbourhood Plan** Policy ES4: Landscape and Countryside Surrounding the Village
Cultural Heritage	To assess impacts upon designated, and undesignated, heritage assets. including World Heritage Sites, Scheduled Monuments, Protected Wreck Sites, Protected Military Remains, Listed Buildings, Registered Parks and Gardens, Registered Battlefields and Conservation Areas.	**NPS EN-1 – Section 5.9 Historic Environment** Paragraphs 5.9.27, 5.9.28, 5.9.29 and 5.9.30. **NPS EN-3 – Section 2.10 Solar Photovoltaic Generation** Paragraphs 2.10.107 and 2.10.116. **NPS EN-5 - Section 2.2 Factors influencing site selection and design** Paragraph 2.2.10.	**Central Lincolnshire Local Plan** Policy S14: Renewable Energy Policy S57: The Historic Environment Policy S58: Protecting Lincoln, Gainsborough and Sleaford's Setting and Character **Bassingham Neighbourhood Plan** Policy ES3: Heritage Assets

Assessment Indicator	Justification	Relevant National Policy	Relevant Local Policy
		NPPF Paragraphs 210, 212, 213, 214, 215 and 216.	
Access for Construction Traffic	To assess the suitability for HGV access from the strategic and local road network, in order to minimise traffic impacts.	**NPS EN-1 – Section 5.14 Traffic and Transport** Paragraphs 5.14.1, 5.14.13 and 5.14.18. **NPS EN-3 – Section 2.10 Solar Photovoltaic Generation** Paragraph 2.10.35 and 2.10.36. **NPPF** Paragraph 115.	**Central Lincolnshire Local Plan** **Policy S14: Renewable Energy** Policy S47: Accessibility and Transport Policy S48: Walking and Cycling Infrastructure **Bassingham Neighbourhood Plan** Policy T1: Transport Considerations in New Development Policy ES5: Renewable Energy Schemes
Flood Risk	To assess areas at higher risk of flooding.	**NPS EN-1 – Section 5.8 Flood Risk** Paragraphs 5.8.6, 5.8.23 and 5.8.36. **NPS EN-3 – Section 2.10 Solar Photovoltaic Generation** Paragraph 2.10.60. **NPS EN-5 – Section 2.3 Climate change adaption and resilience** Paragraphs 2.3.2 and 2.3.3. **NPPF** Paragraph 170, 172, 173, 174, 175 and 181.	**Central Lincolnshire Local Plan** Policy S12: Water Efficiency and Sustainable Water Management Policy S14: Renewable Energy Policy S20: Resilient and Adaptable Design Policy S21: Flood Risk and Water Resources
Solar Array Shading	The identification of features that may affect irradiance resulting in shading, such as trees and hedgerows.	**NPS EN-3 – Section 2.10 Solar Photovoltaic Generation** Paragraphs 2.10.19 and 2.10.60.	**Central Lincolnshire Local Plan** Policy S14: Renewable Energy
Topography	To identify areas of relatively flat land that is optimal for solar generation.	**NPS EN-3 – Section 2.10 Solar Photovoltaic Generation** Paragraphs 2.10.19, 2.10.60 and 2.10.61. **NPS EN-5 - Section 2.2 Factors influencing site selection and design** Paragraph 2.2.9.	**Central Lincolnshire Local Plan** Policy S14: Renewable Energy

Appendix C: Assessment Mapping Results

Revision: 01 Drawn: HW Checked: AM Approved: LR Date: 2025-07-03

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Fosse Green Energy

PROJECT

Fosse Green Energy

CLIENT

Fosse Green Energy Ltd

CONSULTANT

AECOM Limited
Sunley House
4 Bedford Park
Surrey, CR0 2AP, UK
www.aecom.com

LEGEND

- Proposed National Grid substation near Navenby (Approximate Location)
- 15km Area of Search From the Point of Connection at the Proposed National Grid substation near Navenby

NOTES

GB Background: Contains OS data © Crown Copyright and database right 2025
Contains data from OS Zoomstack© Natural England copyright. Contains Ordnance Survey data © Crown copyright and database right [2025].

ISSUE PURPOSE

Site Selection Report

PROJECT NUMBER

60700987

FIGURE TITLE

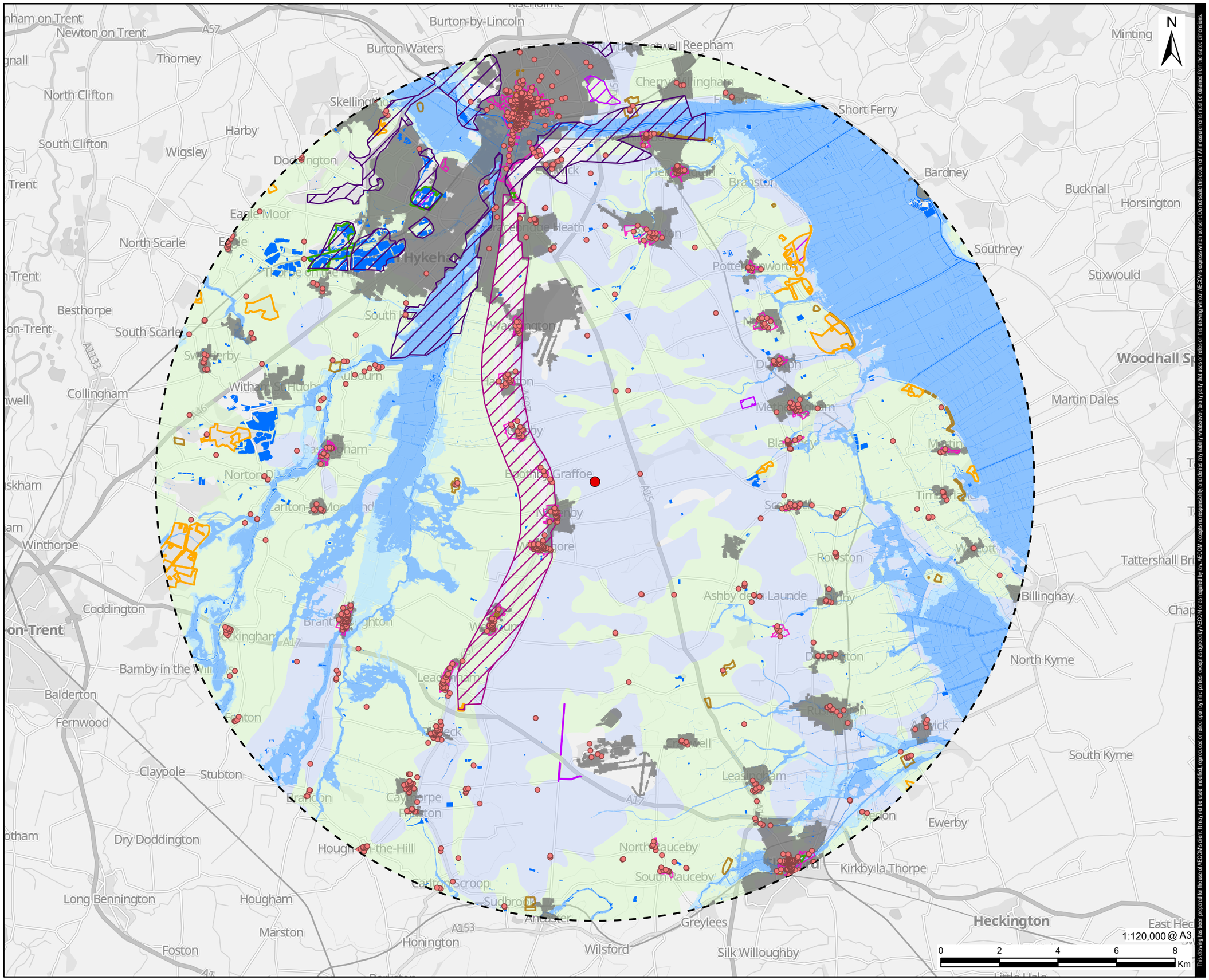
Point of Connection at the Proposed National Grid Substation near Navenby and Area of Search

FIGURE NUMBER

Figure 1

Revision: 01 Drawn: HW Checked: AM Approved: LR Date: 2025-07-03

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Fosse Green Energy

PROJECT

Fosse Green Energy

CLIENT

Fosse Green Energy Ltd

CONSULTANT

AECOM Limited
Sunley House
4 Bedford Park
Surrey, CR0 2AP, UK
www.aecom.com

LEGEND

- Proposed National Grid substation near Navenby (Approximate Location)
- 15km Area of Search From the Point of Connection at the Proposed National Grid substation near Navenby
- Listed Buildings
- Conservation Areas
- Site of Special Scientific Interest (SSSI)
- Green Wedges (Policy S63) Waddington to Bracebridge Heath Green Wedge
- Area of Great Landscape Value (Policy S62) Lincoln Cliff Area of Great Landscape Value
- Scheduled Monument
- Local Nature Reserve
- Ancient Woodland
- Natural England ALC Grade 2
- Natural England ALC Grade 3
- Flood Zone 2
- Flood Zone 3
- Built Up Area
- Surface Water Bodies

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ISSUE PURPOSE

Site Selection Report

PROJECT NUMBER

60700987

FIGURE TITLE

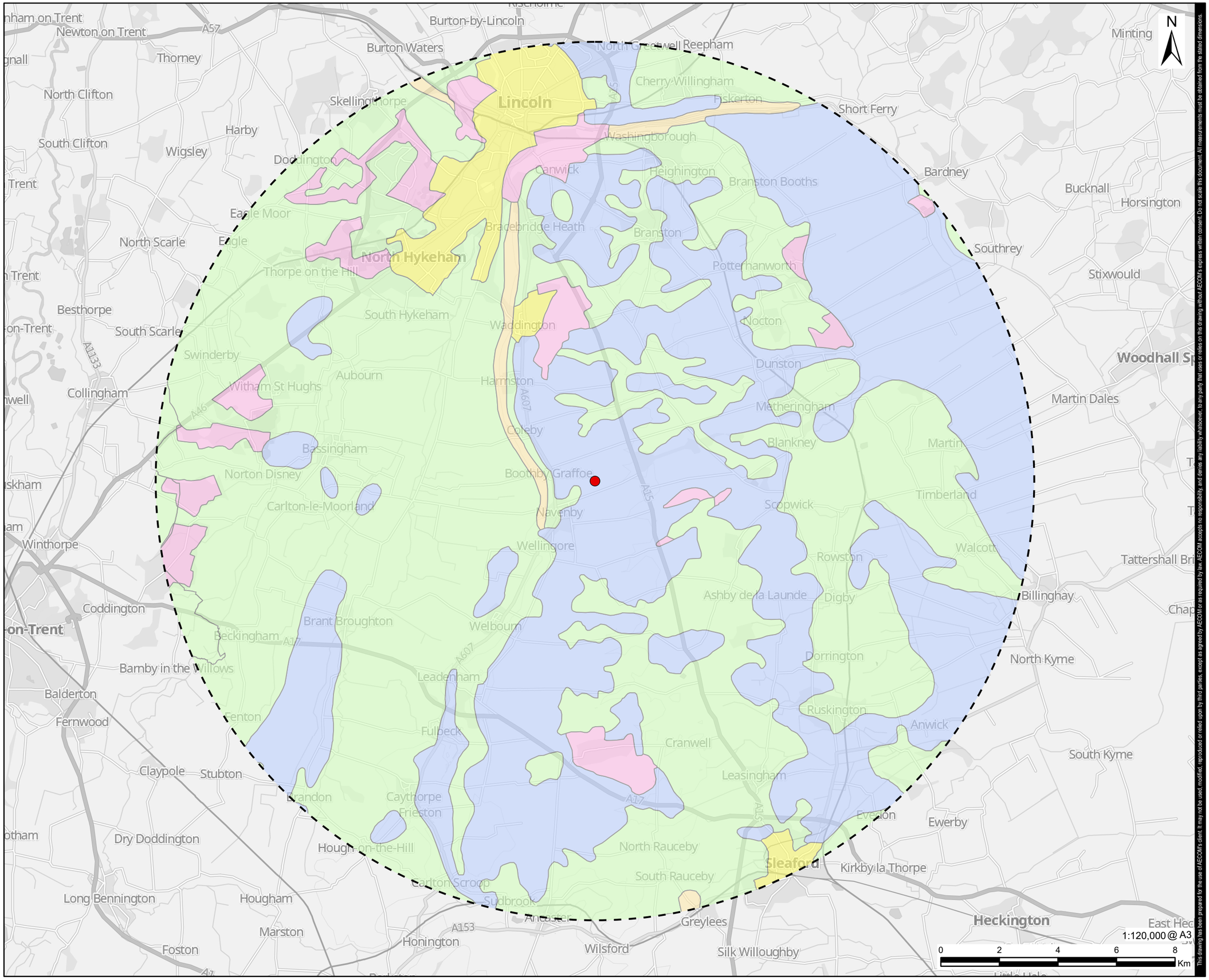
Planning, Environmental and Land Use Constraints for the Point of Connection at the Proposed National Grid Substation near Navenby

FIGURE NUMBER

Figure 2

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4 Bedford Park
Surrey, CR0 2AP, UK
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LEGEND

- Proposed National Grid substation near Navenby (Approximate Location)
- 15km Area of Search From the Point of Connection at the Proposed National Grid substation near Navenby

Natural England Agricultural Land Classification

- Grade 2
- Grade 3
- Grade 4
- Non Agricultural
- Urban

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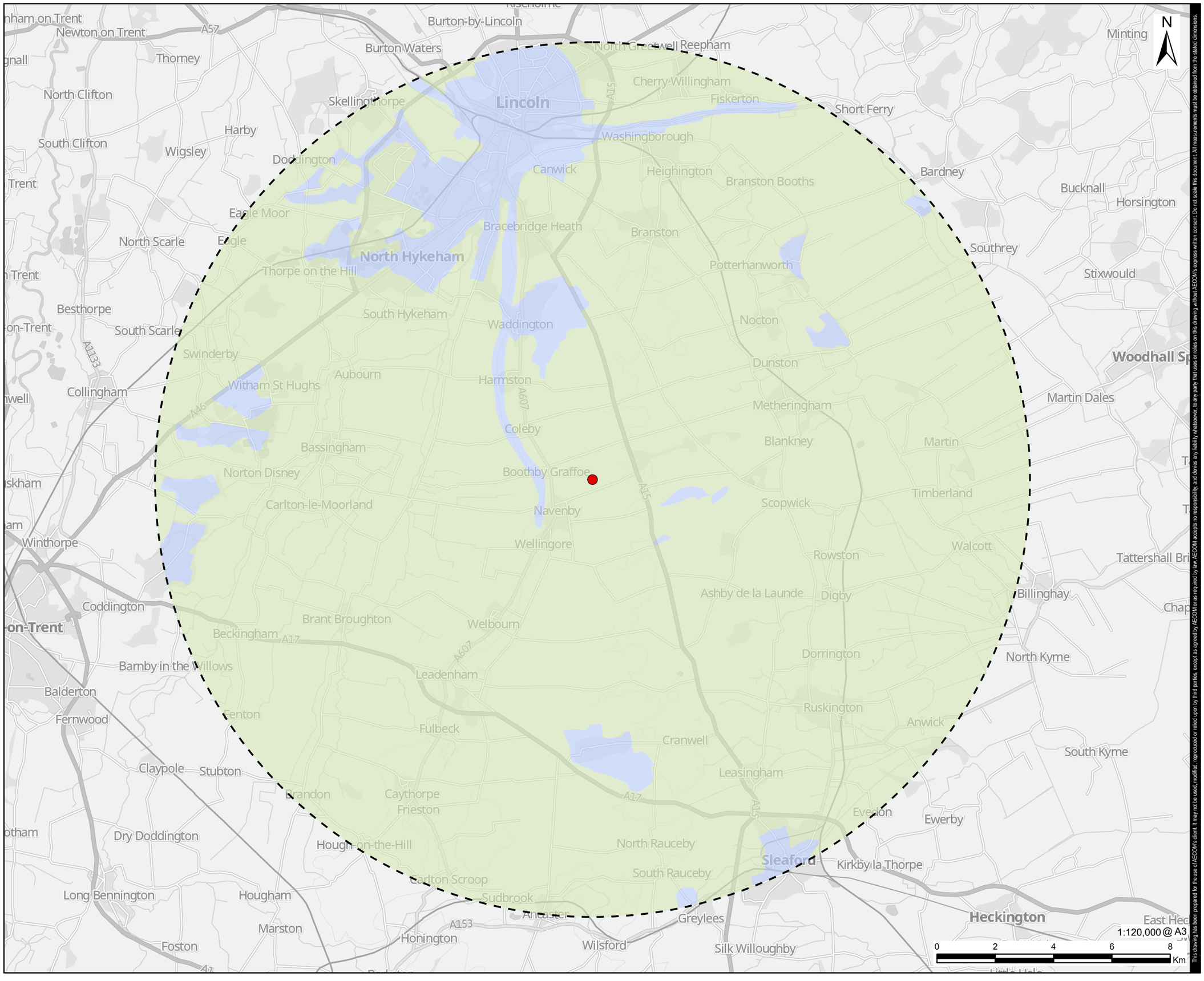
Agricultural Land Classification within the Area of Search for the Point of Connection at the Proposed National Grid Substation near Navenby

FIGURE NUMBER

Figure 3

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LEGEND

- Proposed National Grid substation near Navenby (Approximate Location)
- 15km Area of Search From the Point of Connection at the Proposed National Grid substation near Navenby

Natural England Agricultural Land Classification

- Best and Most Versatile Excluded Land
- Available Land

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Best and most versatile excluded land includes Grades 1-3. Subgrades 3a and 3b could not be distinguished in this dataset so grade 3 has been used.

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FIGURE TITLE

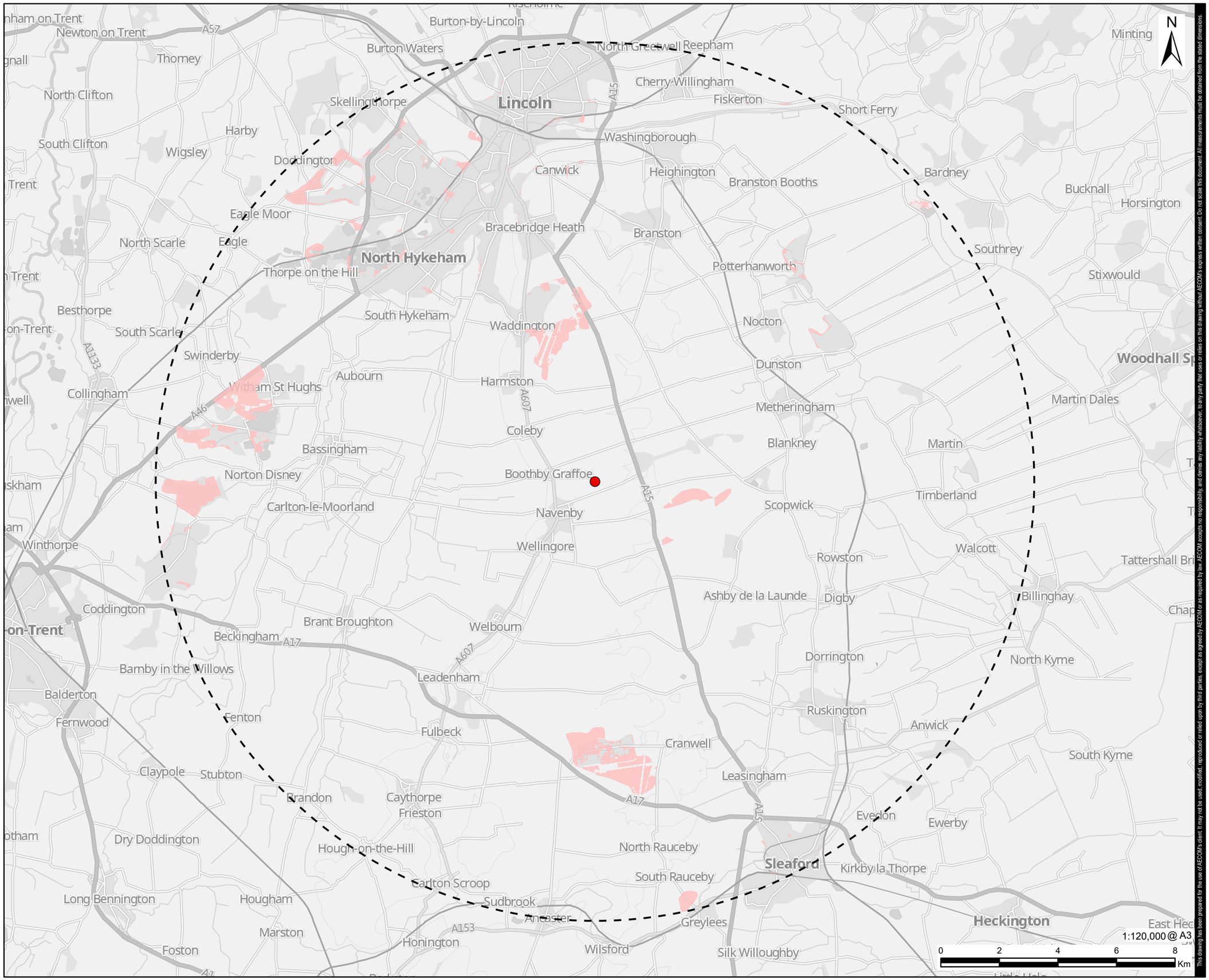
Best and Most Versatile Land Excluded within the Area of Search for the Point of Connection at the Proposed National Grid Substation near Navenby

FIGURE NUMBER

Figure 4

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CONSULTANT

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Sunley House
4 Bedford Park
Surrey, CR0 2AP, UK
www.aecom.com

LEGEND

- Proposed National Grid substation near Navenby (Approximate Location)
- 15km Area of Search From the Point of Connection at the Proposed National Grid substation near Navenby
- Unconstrained Land

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ISSUE PURPOSE

Site Selection Report

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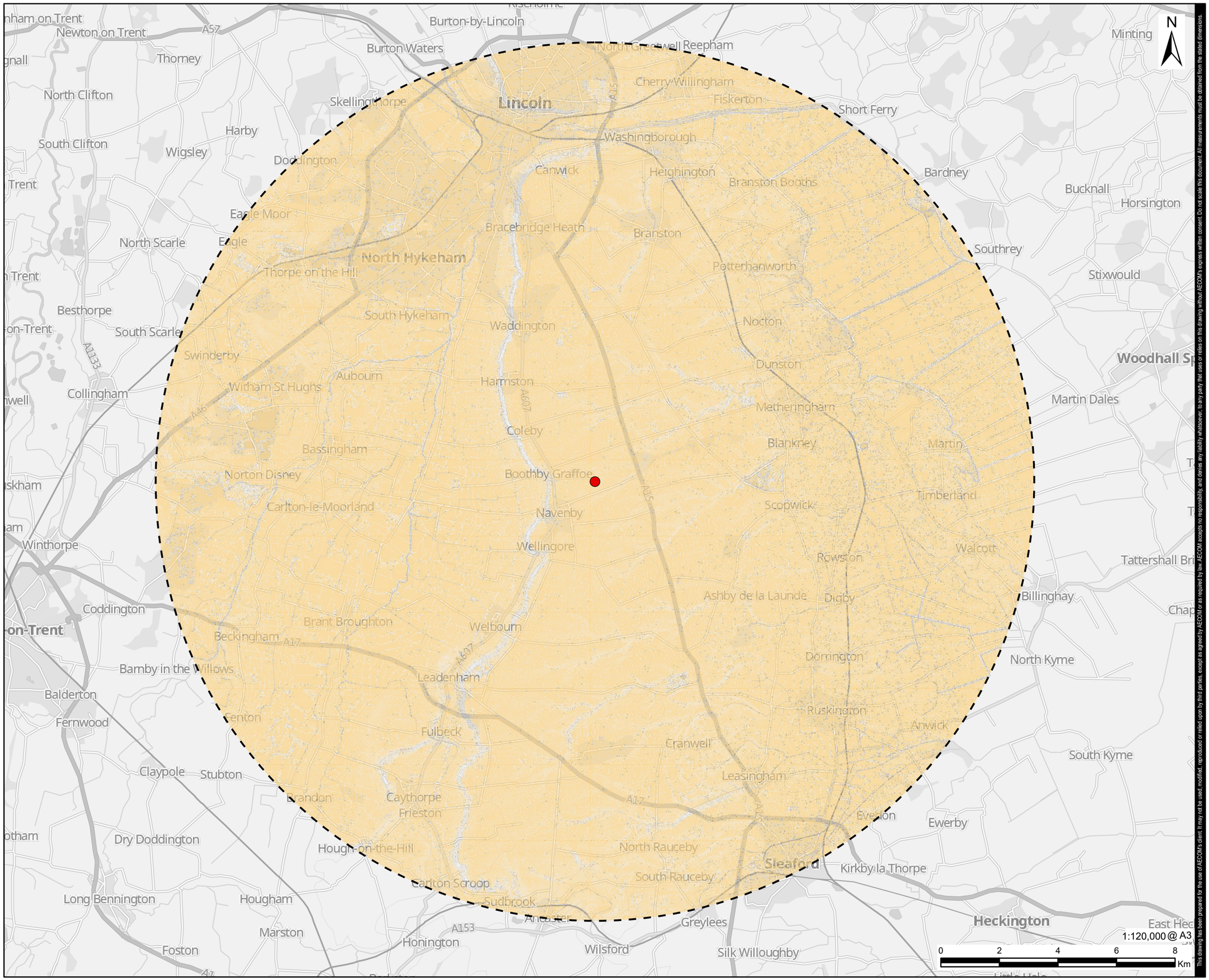
60700987

FIGURE TITLE

Unconstrained Land within the Area of Search for the Point of Connection at the Proposed National Grid Substation near Navenby

FIGURE NUMBER

Figure 5



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AECOM Limited
Sunley House
4 Bedford Park
Surrey, CR0 2AP, UK
www.aecom.com

LEGEND

- Proposed National Grid substation near Navenby (Approximate Location)
- 15km Area of Search From the Point of Connection at the Proposed National Grid substation near Navenby

Elevation

- 3% or Less Gradient

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FIGURE TITLE

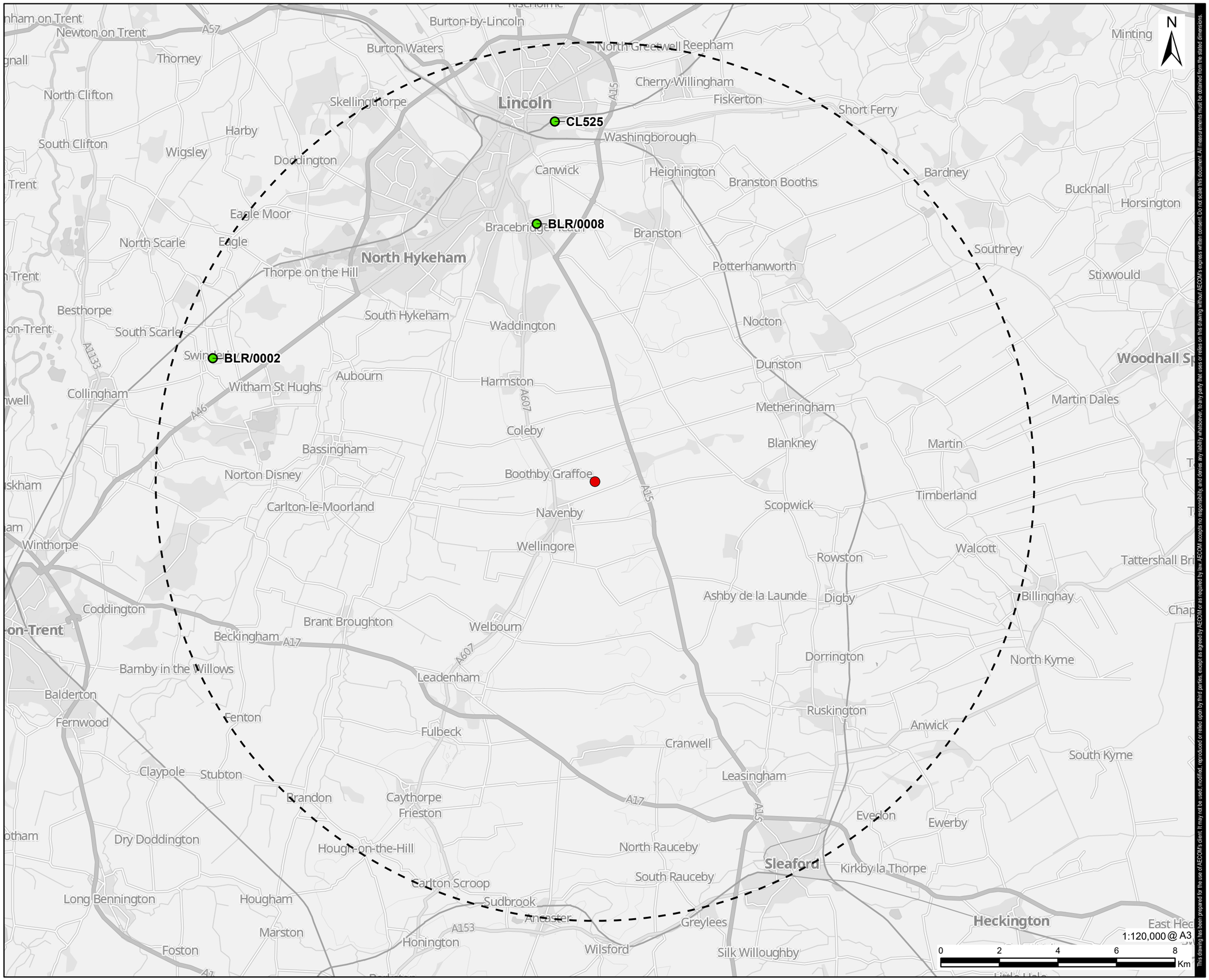
Topography within the Area of Search for the Point of Connection at the Proposed National Grid Substation near Navenby

FIGURE NUMBER

Figure 6

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CONSULTANT

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4 Bedford Park
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www.aecom.com

LEGEND

- Proposed National Grid substation near Navenby (Approximate Location)
- 15km Area of Search From the Point of Connection at the Proposed National Grid substation near Navenby
- Brownfield Site

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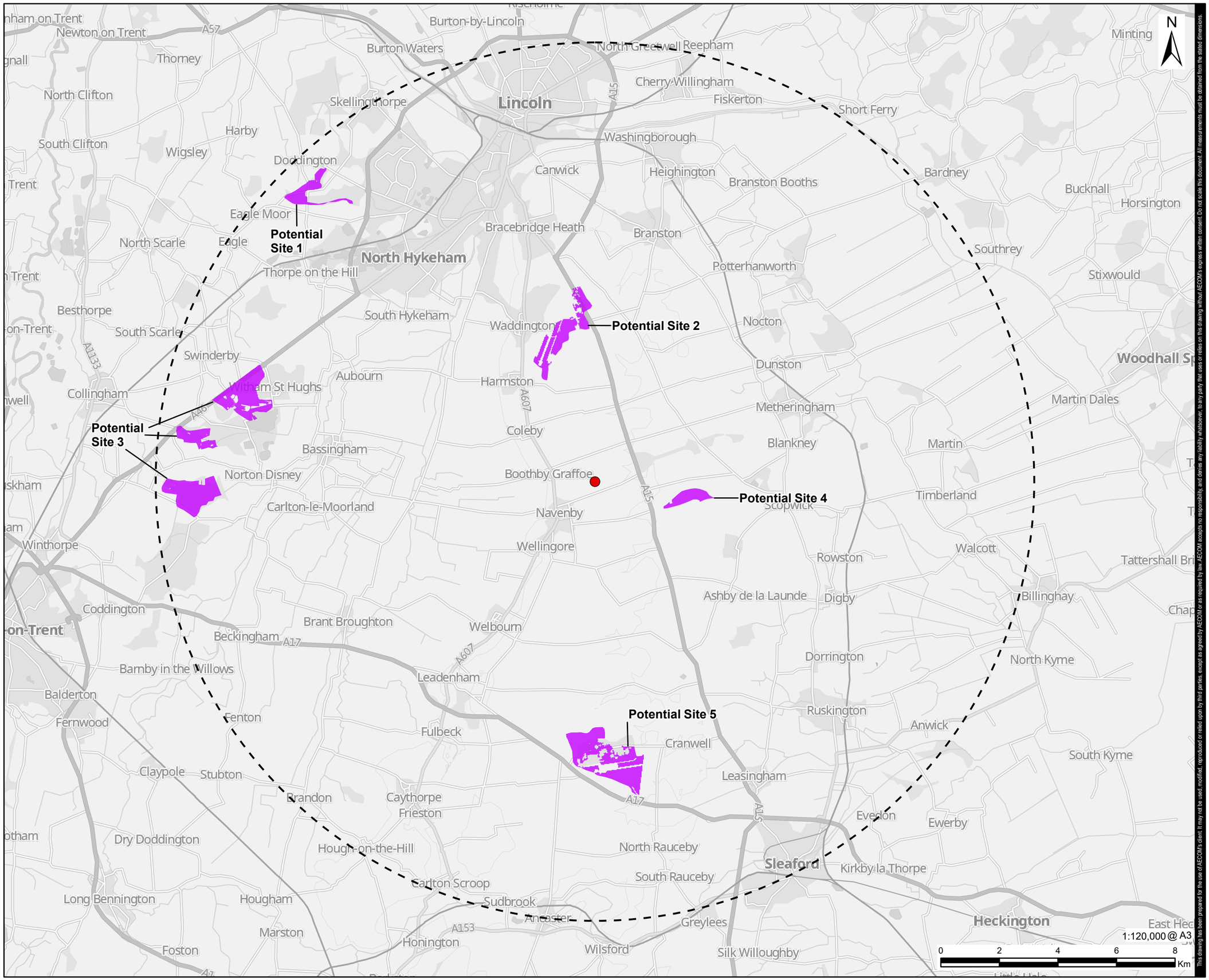
Brownfield Sites within the Area of Search for the Point of Connection at the Proposed National Grid Substation near Navenby

FIGURE NUMBER

Figure 7

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4 Bedford Park
Surrey, CR0 2AP, UK
www.aecom.com

LEGEND

- Proposed National Grid substation near Navenby (Approximate Location)
- 15km Area of Search From the Point of Connection at the Proposed National Grid substation near Navenby
- Potential Sites over 40 Hectares in Area

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Potential Development Areas generated based on Figure 5 Constrained Land and filtered to show sites 40 hectares or larger in area.

ISSUE PURPOSE

Site Selection Report

PROJECT NUMBER

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FIGURE TITLE

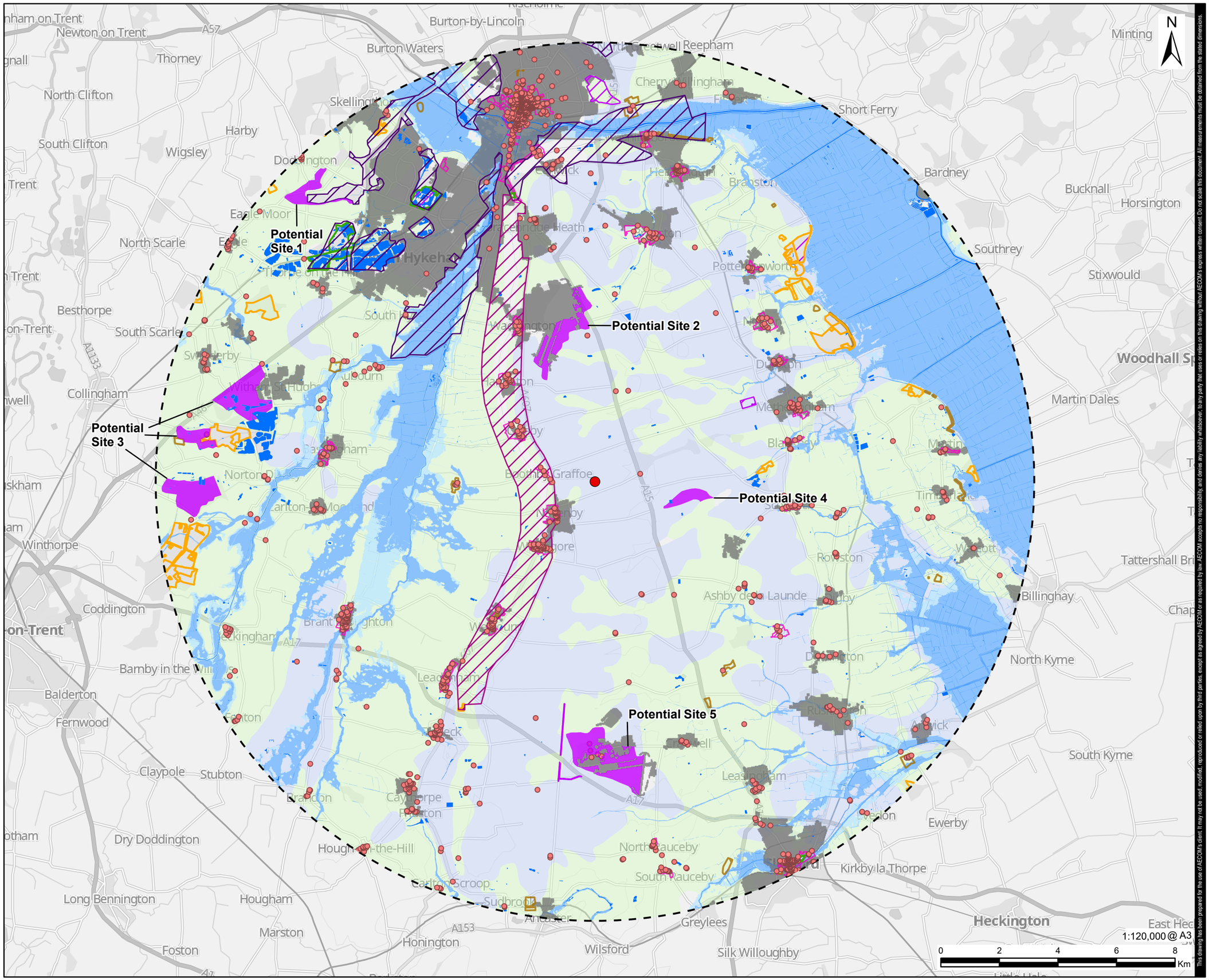
Potential Alternative Sites within the Area of Search for the Point of Connection at the Proposed National Grid Substation near Navenby

FIGURE NUMBER

Figure 8

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Surrey, CR0 2AP, UK
www.aecom.com

LEGEND

- Proposed National Grid substation near Navenby (Approximate Location)
- 15km Area of Search From the Point of Connection at the Proposed National Grid substation near Navenby
- Potential Sites over 40 Hectares in Area
- Listed Buildings
- Conservation Areas
- Site of Special Scientific Interest (SSSI)
- Green Wedges (Policy S63) Waddington to Bracebridge Heath Green Wedge
- Area of Great Landscape Value (Policy S62) Lincoln Cliff Area of Great Landscape Value
- Scheduled Monument
- Local Nature Reserve
- Ancient Woodland
- Natural England ALC Grade 2
- Natural England ALC Grade 3
- Flood Zone 2
- Flood Zone 3
- Built Up Area
- Surface Water Bodies

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ISSUE PURPOSE

Site Selection Report

PROJECT NUMBER

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FIGURE TITLE

Planning, Environmental and Land Use Constraints for Potential Alternative Sites within the Area of Search for the Point of Connection at the Proposed National Grid Substation near Navenby

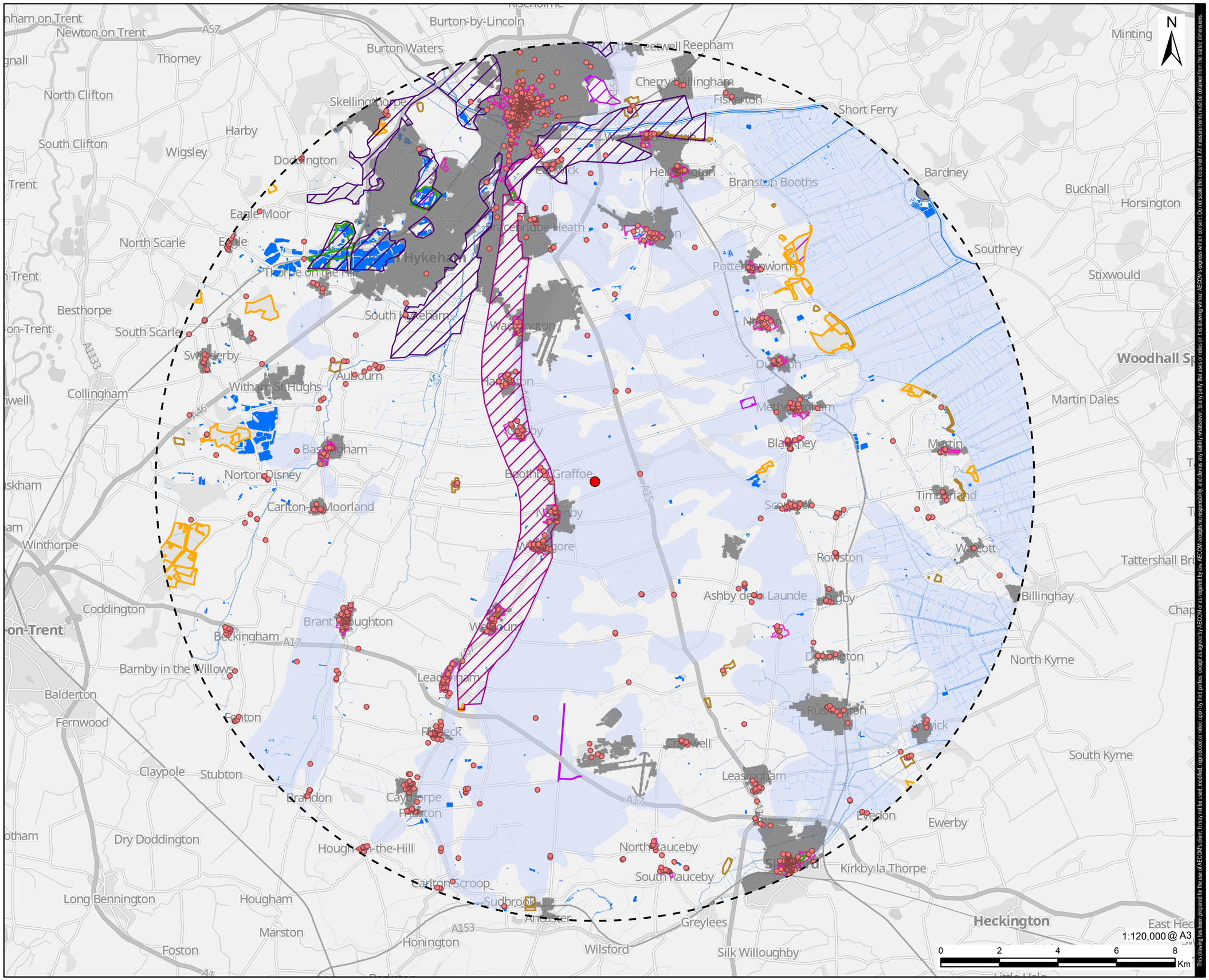
FIGURE NUMBER

Figure 9

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Fosse Green Energy Ltd

CONSULTANT

AECOM Limited
Sunley House
4 Bedford Park
Surrey, CR0 2AP, UK
www.aecom.com

LEGEND

- Proposed National Grid substation near Navenby (Approximate Location)
- 15km Area of Search From the Point of Connection at the Proposed National Grid substation near Navenby
- Listed Buildings
- Conservation Areas
- Site of Special Scientific Interest (SSSI)
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ISSUE PURPOSE

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FIGURE TITLE

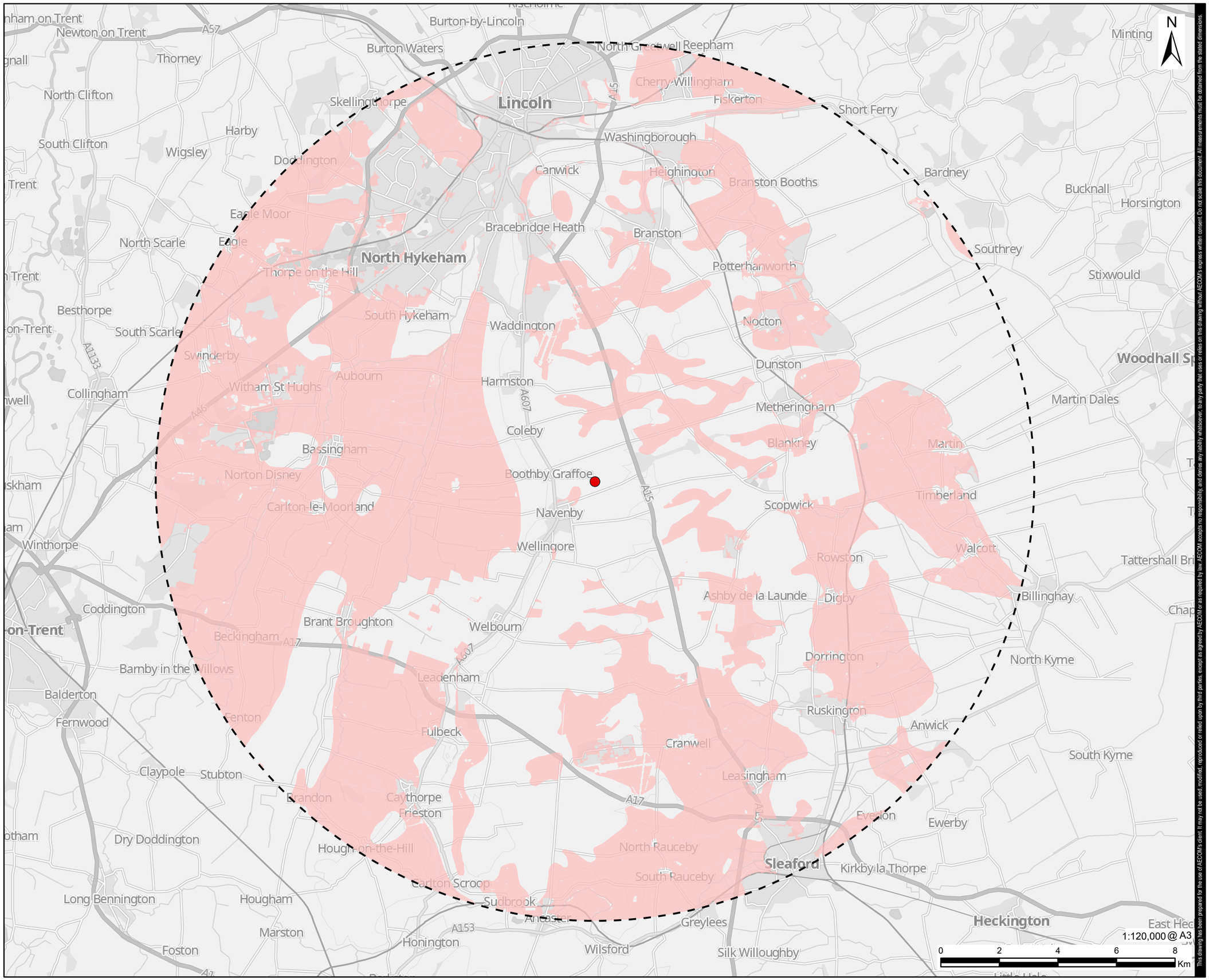
Planning, Environmental and Land Use Constraints (Including Grade 3 Agricultural Land and Flood Zones 2 and 3) within the Area of Search for the Point of Connection at the Proposed National Grid Substation near Navenby

FIGURE NUMBER

Figure 10

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AECOM Limited
Sunley House
4 Bedford Park
Surrey, CR0 2AP, UK
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LEGEND

- Proposed National Grid substation near Navenby (Approximate Location)
- 15km Area of Search From the Point of Connection at the Proposed National Grid substation near Navenby
- Unconstrained Land

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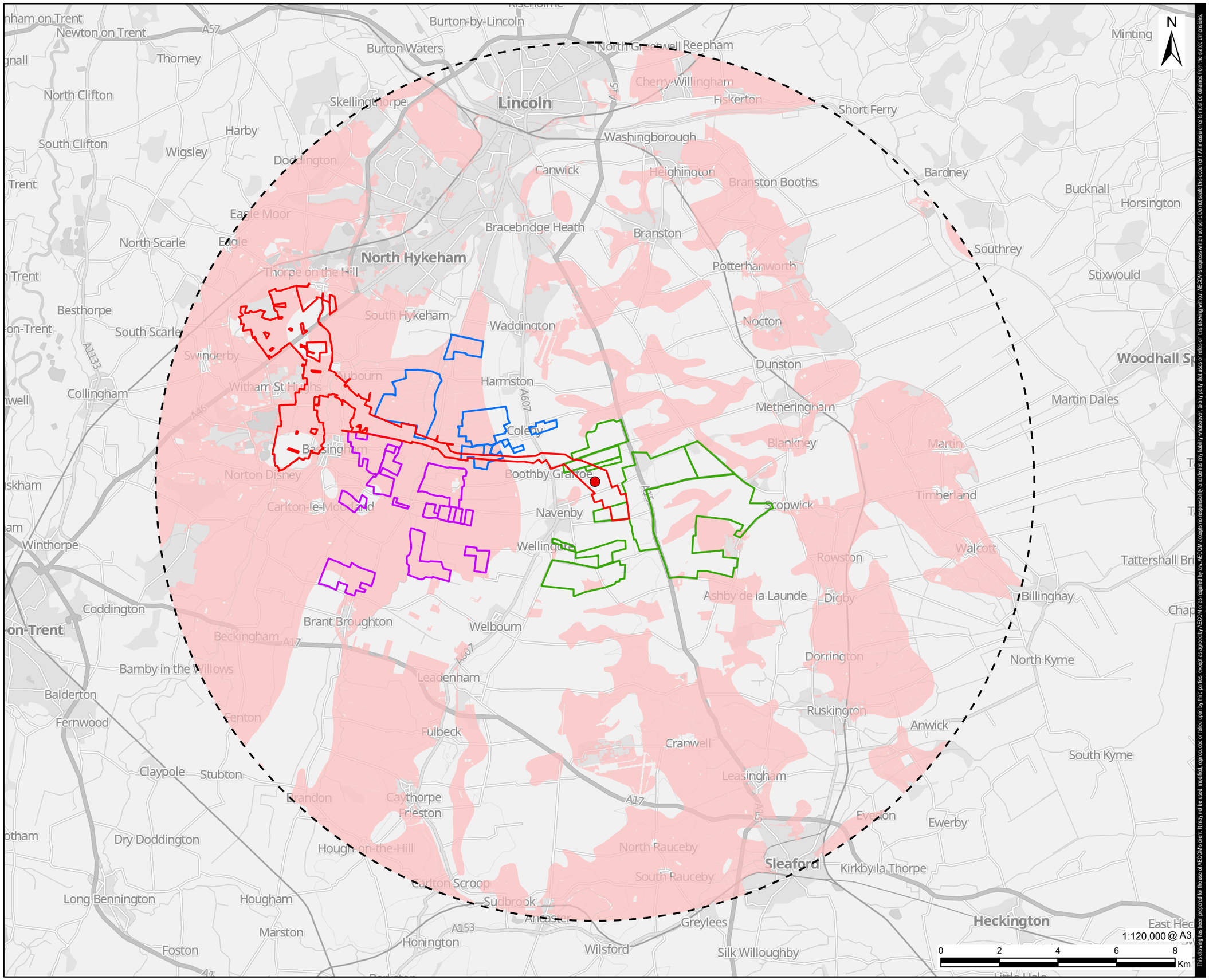
Unconstrained Land within the Area of Search for the Point of Connection at the Proposed National Grid Substation near Navenby

FIGURE NUMBER

Figure 11

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LEGEND

- Proposed National Grid substation near Navenby (Approximate Location)
- 15km Area of Search From the Point of Connection at the Proposed National Grid substation near Navenby
- Unconstrained Land

Potential Sites

- Potential Site 6
- Potential Site 7
- Potential Site 8
- Potential Site 9

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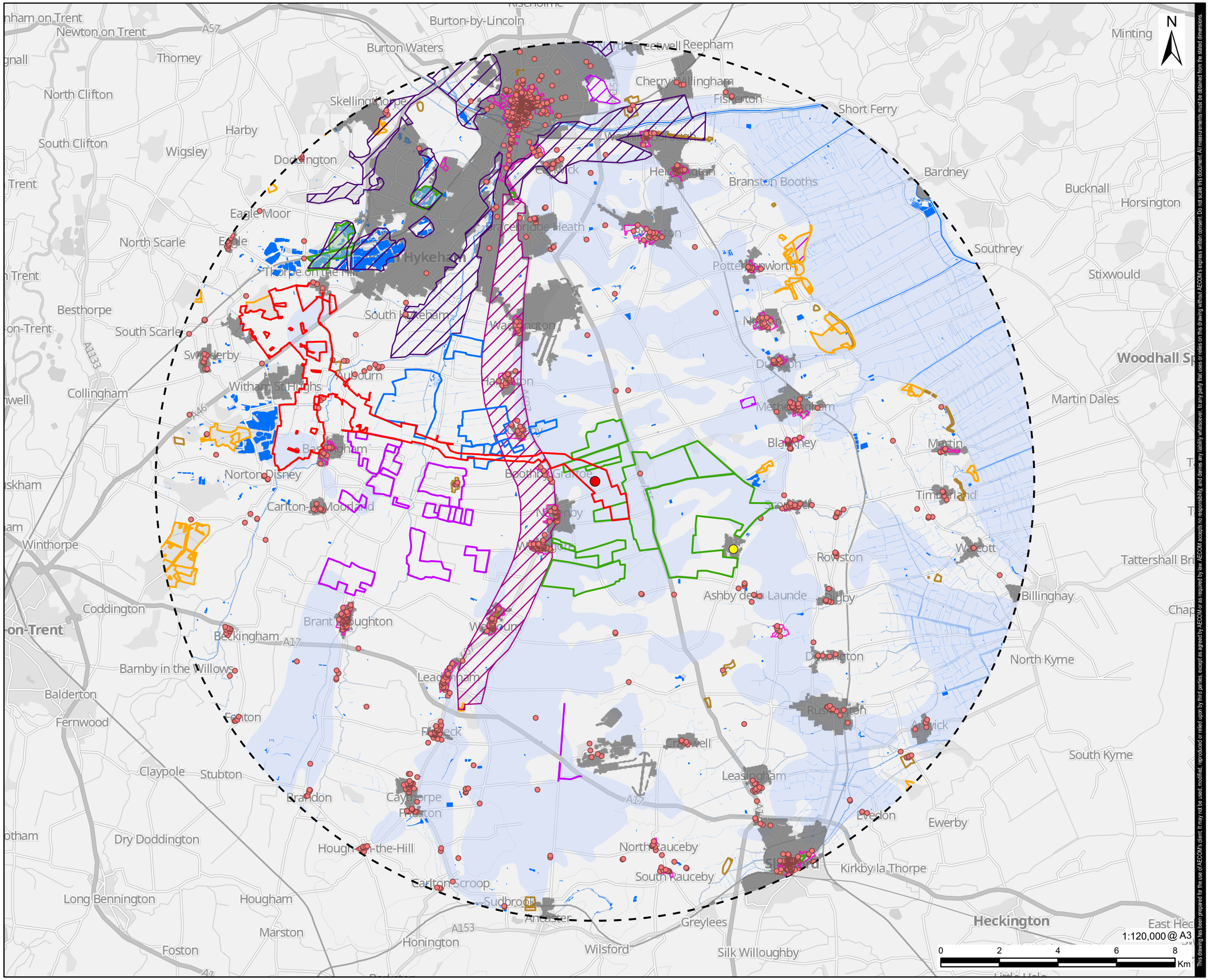
Potential Alternative Sites within the Area of Search for the Point of Connection at the Proposed National Grid Substation near Navenby

FIGURE NUMBER

Figure 12

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Sunley House
4 Bedford Park
Surrey, CR0 2AP, UK
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LEGEND

- Proposed National Grid substation near Navenby (Approximate Location)
- 15km Search Area From the Point of Connection near Navenby Substation

Potential Sites

- Potential Site 6
- Potential Site 7
- Potential Site 8
- Potential Site 9
- Listed Buildings
- RAF Digby
- Conservation Areas
- Site of Special Scientific Interest (SSSI)
- Green Wedges (Policy S63) Waddington to Bracebridge Heath Green Wedge
- Area of Great Landscape Value (Policy S62) Lincoln Cliff Area of Great Landscape Value
- Scheduled Monument
- Local Nature Reserve
- Ancient Woodland
- Natural England ALC Grade 2
- Surface Water Bodies
- Built Up Area

NOTES

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ISSUE PURPOSE

Site Selection Report

PROJECT NUMBER

60700987

FIGURE TITLE

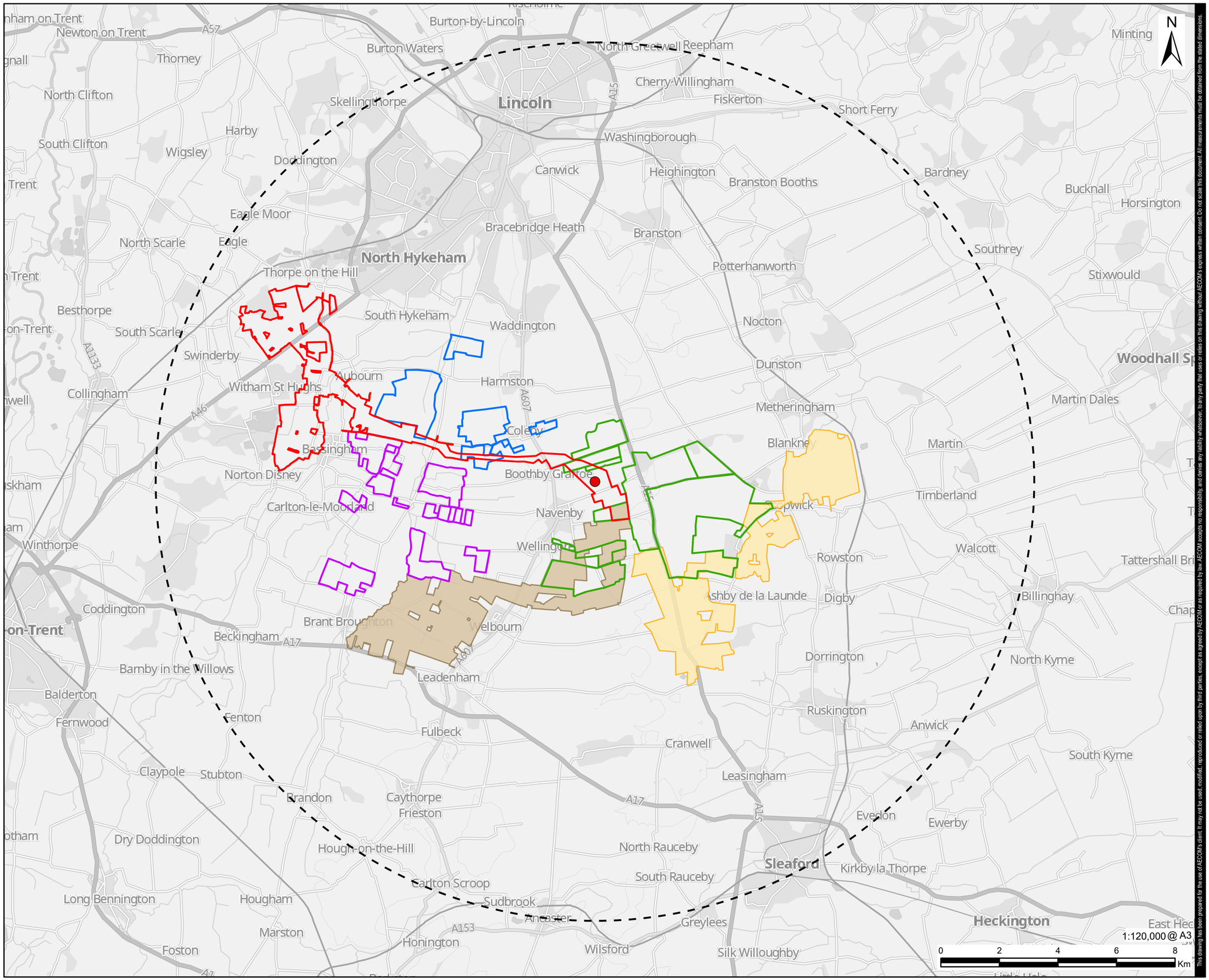
Planning, Environmental and Land Use Constraints for Potential Alternative Sites within the Area of Search for the Point of Connection at the Proposed National Grid Substation near Navenby

FIGURE NUMBER

Figure 13

Revision: 01 Drawn: HW Checked: AM Approved: LR Date: 2025-07-03

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PROJECT

Fosse Green Energy

CLIENT

Fosse Green Energy Ltd

CONSULTANT

AECOM Limited
Sunley House
4 Bedford Park
Surrey, CR0 2AP, UK
www.aecom.com

LEGEND

- Proposed National Grid substation near Navenby (Approximate Location)
- 15km Area of Search From the Point of Connection at the Proposed National Grid substation near Navenby
- Springwell Solar Farm
- Leoda Solar Farm

Potential Sites

- Potential Site 6
- Potential Site 7
- Potential Site 8
- Potential Site 9

NOTES

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ISSUE PURPOSE

Site Selection Report

PROJECT NUMBER

60700987

FIGURE TITLE

Potential Alternative Sites and Solar Infrastructure that Comprises a Nationally Significant Infrastructure Project

FIGURE NUMBER

Figure 14

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Appendix D: Site Assessment Results

Table D-1: Assessment Results for Potential Alternative Sites assessed at Stage 4

Indicator	Site 3	
Site Size (ha) (approximately)	385 ha	
Site Description	Hawdin's Wood	
Indicator	**RAG**	**Justification**
Land Use		The northern parcel of the site boundary borders the western edge of the village of Witham St Hughs. The southern parcel of Site 3 is in close proximity to the settlement of Norton Disney. There are no Conservation Areas located within the site or within 500m of Site 3. The northern parcel of the site is a disused RAF airfield (former RAF Swinderby) and borders the village of Witham St Hughs. The airfield still remains and there are a number of relevant approved planning applications in relation to the land, including: • PL/0153/15 - a logistics compound for parking of heavy commercial vehicles, office accommodation, mess room facilities, and car park was submitted and approved in 2016 by Lincolnshire County Council. It would appear from satellite imagery that this development has been constructed. • Several applications in relation to the extraction of sand and gravel from part of the airfield have been made to Lincolnshire County Council. Notably application reference PL/0048/08 was approved in 2011 for the extraction of sand and gravel involving the erection of processing, reading mix concrete, mortar and recycling plant and the siting of associated infrastructure. Additionally, in 2014 the application PL/0259/13 for the construction of a workshop and compound for ancillary use of sand and gravel extraction was approved. This forms an existing use on site. • There are a number of applications for residential development approved and constructed to the east of RAF Swinderby. The central parcel of Site 3 comprises predominantly agricultural fields currently used for arable crops, and the southern parcel of Site 3 comprises a vast area of woodland, Stapleford Moor and Woods which is partly dedicated as open access land under the Countryside and Rights of Way Act 2000 (CROW Act 2000). The southern parcel of Site 3 also borders the Norton Bottoms Quarry at its eastern extent. The site is not intersected by any PRoWs however a bridleway passes through Stapleford Woods within the southern parcel of Site 3. From online mapping, the majority of the area of Site 3 is Grade 3 Agricultural Land Classification land. From a planning history search of the past 5 years, within Site 3, there are three sites with extant planning permission however these have all been developed. • 17/1544/FUL is for the erection of an artist's studio, a tree house, and a toilet/shower/sauna block; • 08/0606/CCC is to extract sand and gravel from part of Swinderby Airfield, involving the erection of processing, ready mix concrete, mortar and recycling plant and the siting of associated infrastructure and the creation of a new access onto Camp Road with restoration to wet woodland, reedbeds, conservation grassland and lakes suitable for nature conservation and public recreation after-uses; and • 23/1078/CCC is to install a solar PV array development and associated infrastructure to generate electricity for the operation of Swinderby Quarry plant machinery and site offices. Site 3 is located in a Minerals Safeguarding Area for sand and gravel, as set out in the Lincolnshire Minerals and Waste Local Plan (adopted June 2016).

Indicator	Site 3	
Grid Connection		Site 3 is located within approximately 10km of the POC. There would be the requirement to cross both the River Brant and River Witham as well as various other smaller watercourses. Local roads would also require crossing to reach the grid connection point.
Ecology and Biodiversity **Study Area:** • 500m Local Nature Reserves, Ancient Woodland • 2km - National Designations • 5km – International Designations		There are no International Designations within 5km of Site 3. There are no National ecological statutory designated sites within the Site 3 boundary or within the 2km study area. The closest statutory designated site is Besthorpe Meadows Site of Special Scientific Interest (SSSI) which is located approximately 5.25km north west of Site 3 at its closest point. There are no Local Nature Reserves within 500m of Site 3. Hawdin's Wood, which is located immediately to the east of the central parcel of Site 3 is designated as Ancient Woodland and covers a substantial area to the east of Site 3. There is a further large area of Ancient Woodland located to the south of the southern most parcel of Site 3. The majority of the southern parcel of Site 3 is woodland and therefore is likely to support notable species such as bats.
Landscape and Visual **Study Area:** • Within the site – ProW • 1km – Other Receptors 5km – National Landscape Designations		The site is not located within or in close proximity to a National Landscape designation. Site 3 is not intersected by any PRoWs within any of the three land parcels that make up Site 3, a bridleway passes through Stapleford Woods within the southern parcel of Site 3. The southern parcel of Site 3 comprises a vast area of woodland, Stapleford Moor which is partly dedicated as open access land under the CROW Act 2000. Residential Receptors are located within the village of Witham St Hughs, which borders the northern parcel of Site 3, to the east. Oakhill Leisure caravan site is located within the northern parcel of Site 3. There are also several scattered residential properties located within the central parcel of Site 3.
Cultural Heritage **Study Area:** 500m - Listed buildings, Registered Parks and Garden, Conservation Areas, Registered Battlefields, Archaeological Priority Areas (APA) 2km - Scheduled Monuments		There are two Grade II listed buildings within the central parcel of Site 3, suitable buffers from which would need to be accounted for in the siting of solar infrastructure. Site 3 is located in close proximity to the A46 which is a Roman Heritage Asset and may have associated buried heritage constraints. There are no Conservation Areas, Registered Parks and Gardens or Registered Battlefields within 500m of Site 3. Site 3 is not located within an APA. The 'West of Hill Holt Farm' Scheduled Monument is located immediately south west of the central parcel of Site 3. Appropriate mitigation and buffers would be needed to avoid impacting this heritage asset. Due to the heritage constraints present within and adjacent to Site 3, accounting for the appropriate buffers that would be required from heritage assets, this would substantially reduce the feasible area for solar infrastructure.
Access for Construction Traffic		Site 3 is in close proximity to the strategic road network and has good access links to the A46, a major road linking Lincoln to Newark. Due to the proximity of the A46, it is unlikely that construction traffic would need to pass through villages and settlements. Some mitigation may be required on minor roads to enable traffic to exit the A46 and travel to the site.
Flood Risk **Study Area:** Within and adjacent to the site - flood risk data. 500m - main rivers		Site 3 is located within Flood Zone 1 however there are multiple surface water bodies within the site that could be prone to flooding. There are no main rivers within the site however, the cable route corridor to connect Site 3 to the grid connection point would involve crossing two main rivers, the Brant and Witham. Site 3 comprises some small areas of high risk of surface water flooding, but the area is predominantly at a low risk of surface water flooding across all three parcels.
Field Shading		There are substantial areas of woodland associated with Stapleford Woods in the southern parcel of Site 3 which would provide significant shading to any solar infrastructure proposed in this area. Ancient Woodland is located in close proximity to the northern and southern parcels.
Topography		Less than 3% gradient.

Indicator	Site 3	
Site Size		The site is approximately 385ha and contains woodland areas that would not be feasible for solar development, therefore the site would not, on its own, be large enough to accommodate the Proposed Development. It is isolated from other potential alternative sites so would not be able to be easily linked to another site without the entirety of the site being fragmented, however this would be subject to further technical assessment to confirm.

Table D-2: Assessment Results for Potential Alternative Sites assessed at Stage 5 for Navenby

Indicator	Site 6		Site 7		Site 8		Site 9	
Site Size (ha) (approximately)	650		790		1,920		1,065	
Site Description	Harmston		Bassingham Fen		Scopwick Heath		The Proposed Development (Fosse Green Energy)	
Indicator	**RAG**	**Justification**	**RAG**	**Justification**	**RAG**	**Justification**	**RAG**	**Justification**
Land Use		The eastern parcel of the site surrounds the settlement of Coleby. The remaining parcels are situated further from settlements and nearby villages, but are still located in proximity to Aubourn, Harmston, Waddington and Coleby. The land is held in multiple ownerships and does not comprise a contiguous site, impacting the technical viability of delivering a viable project. There are no Conservation Areas located within the site or within 500m of Site 6. The surrounding land use is predominantly agricultural land currently used for arable crops. The site is intersected by multiple PRoW, particularly within the western most parcel of the site. From online mapping, it is understood that the majority of the area of Site 6 is Grade 3 Agricultural Land Classification (ALC) land however, within the eastern most parcel of Site 6 there is an area of Grade 2 ALC land which is classed as 'best and most versatile' land. From a planning history search of the past 5 years, within Potential Site 6, there are two sites with planning permission. These are 23/1447/CCC		The north western parcel of the site is located in close proximity to the village of Bassingham. The remaining parcels are situated further from settlements and nearby villages but are in proximity to Brant Broughton and Cartlon-le-Moorland. The land is held in multiple ownerships and does not comprise a contiguous site, impacting the technical viability of delivering a viable project. There are no Conservation Areas located within the site or within 500m of Site 7. The surrounding land use is predominantly agricultural land currently used for arable crops. The site is intersected by multiple PRoW, within the majority of land parcels of Site 7. From online mapping, it is understood that the majority of the area of Site 7 is Grade 3 ALC land however, there are some areas of Grade 2 ALC land within the southern-most and central parcels which is classed as 'best and most versatile' land. From a planning history search of the past 5 years, within Potential Site 7, there are six sites with planning		The western parcels of the site are located in proximity to the villages of Navenby, Boothby Graffoe and Wellingore and the eastern parcels are located in proximity to Scopwick and Ashby-de-la-Launde. The land is held in multiple ownerships and does not comprise a contiguous site, impacting the technical viability of delivering a viable project. There are no Conservation Areas located within the site or within 500m of Site 8. The surrounding land use is predominantly agricultural land currently used for arable crops. The site also borders RAF Digby at the south eastern extent which is an operational airfield and now would also overlap with the location of the proposed Leoda and Springwell Solar Farms, both nationally significant infrastructure projects. The site is intersected by multiple PRoW, particularly within the southern part of Site 8. From online mapping, it is understood that the vast majority		The site is located in close proximity to the villages of Thorpe on the Hill, Witham St Hughs, Bassingham, Aubourn and Boothby Graffoe. The land is held in relatively few ownerships and forms a contiguous site. There is a Conservation Area located within Bassingham which is within 500m of Site 9. The surrounding land use is predominantly agricultural land currently predominantly used for arable crops. The site also borders residential areas. The site is intersected by multiple PRoW and bridleways, as well as permissive paths. From online mapping, it is understood that the vast majority of the area of Site 9 is Grade 3 ALC, with some areas showing to be Grade 2 land which is classed as 'best and most versatile' land. From a planning history search of the past 5 years, within Potential Site 9, there are six sites with planning permission. The applications are as follows:

Indicator	Site 6	Site 7	Site 8	Site 9
	and 19/0614/PNND. The applications are as follows: • 19/0614/PNND Prior approval for a proposed change of use from agricultural barn to dwelling (Class C3) and for associated operational development. (Resubmission of 18/1633/PNND); and • 23/1447/CCC - For the construction of the North Hykeham Relief Road (NHRR) between the A46 Hykeham Roundabout and the A15 Sleaford Road Roundabout at the end of the Lincoln Eastern Bypass, with junctions at South Hykeham Road, Brant Road and Grantham Road. The Proposed Scheme will comprise 8km of dual all-purpose carriageway with a 70mph speed limit (120kph design speed) and associated structures, earthworks, drainage, street lighting, traffic signals, utility diversions and installations, pipeline diversion, temporary materials processing, landscaping, and highway features.	permission. The applications are as follows: • 22/0476/PNREN Installation of solar PV system; • 25/0058/PNAGR Alterations and extension to current track to access fields to the south-west and the breeding and tractor sheds to the south and west of the cottage; • 24/0551/PNAGR Erection of agricultural building over hardstanding; • 23/0037/FUL Erection of 17.8m (tip height) wind turbine; • 24/0303/LBC Erection of building containing energy centre (incorporating integrated solar panelled roof), stables and studio to replace existing Dutch Barn; • 24/0302/HOUS Erection of building containing energy centre (incorporating integrated solar panelled roof), stables and studio to replace existing Dutch Barn.	of the area of Site 8 is Grade 2 ALC land which is classed as 'best and most versatile' land. The remaining areas are classed as Grade 3 ALC land. From a planning history search of the past 5 years, within Potential Site 8, there are nine sites with planning permission. The applications are as follows: • 24/0950/FUL Erection of a new office and training building, together with associated ancillary buildings, access; • 24/0377/EIASCR Proposed office and training building - Request for Screening Opinion; • 21/1268/FUL Demolition of existing and erection of replacement agricultural store; • 21/1309/FUL Erection of agricultural machinery store; • 20/1049/PNAGR Construction of two agricultural irrigation ponds; • 24/1080/EIASCR Erection of new 400kv Air Insulated Switchgear (AIS) substation and associated development; • 24/0720/PNAGR Extension to existing grain store; • 22/0412/PNAGR Erection of grain store/machinery shed; and • 21/1245/FUL Installation of a 100.3kW ground mounted solar PV installation comprising of 264 solar panels.	• 21/1486/FUL Erection of 9 no. dwellings and associated garages/outbuildings, vehicular and pedestrian access, internal road, drainage and landscaping; • 22/1405/OUT Outline planning application (with all matters reserved except means of access) for the erection of a 22 no. dwelling • 23/0390/EIASCO Erection of 400MW Battery Storage Development incorporating 324no. Containerised Battery Storage Units- Request for Scoping Opinion; • 24/1080/EIASCR Erection of new 400kv Air Insulated Switchgear (AIS) substation and associated development; • 21/1051/OHL Installation of a free standing pole mounted transformer; • 21/0824/PNAGR Proposed Covered Digestate Storage Lagoon. .
Grid Connection	Site 6 is located within approximately 2.5km of a POC. There would be the requirement to cross various smaller watercourses to reach	Site 7 is located within approximately 4km of a POC. There would be the potential requirement to cross the River Brant	Site 8 is located within 500m of a POC. There would be minimal requirements to cross	Site 9 is located approximately 10km from the POC at its closest point. There would be the requirement to cross the River Witham and River

Indicator	Site 6		Site 7		Site 8		Site 9	
		the connection point. Local roads and the A607 would also require crossing to reach the grid connection point.		and various smaller watercourses to reach the connection point. Local roads and the A607 would also require crossing to reach the grid connection point.		watercourses to reach the connection point however, the A15 may need to be crossed.		Brant and various smaller watercourses to reach the grid connection point. Local roads and the A46 would also require crossing to reach the grid connection point.
Ecology and Biodiversity		There are no International Designations within 5km of Site 6. There are no National ecological statutory designated sites within the Site 6 boundary or within the 2km study area. The closest statutory designated site is Metheringham Heath Quarry Site of Special Scientific Interest (SSSI) which is located approximately 7km east of Site 6 at its closest point. There are no Local Nature Reserves within 500m of Site 6. There are no Ancient Woodland designations within 500m of Site 6. There is an area of woodland located within the western parcel of Site 6, the River Brant also passes through this parcel and therefore the area is likely to support notable species such as bats and riparian mammals such as otters.		There are no International Designations within 5km of Site 7. There are no National ecological statutory designated sites within the Site 7 boundary or within the 2km study area. The closest statutory designated site is Metheringham Heath Quarry Site of Special Scientific Interest (SSSI) which is located approximately 9.6km north east of Site 7 at its closest point. There are no Local Nature Reserves within 500m of Site 7. There are no Ancient Woodland designations within 500m of Site 7. Within the north eastern parcel of Site 7 there is an area surrounding Somerton Castle that comprises a number of clusters of trees. The River Brant also passes adjacent to this parcel and therefore the area is likely to support notable species such as bats and riparian mammals such as otters.		There are no International Designations within 5km of Site 8. There are no National ecological statutory designated sites within the Site 8 boundary or within the 2km study area. The closest statutory designated site is Metheringham Heath Quarry Site of Special Scientific Interest (SSSI) which is located approximately 2km north east of Site 8 at its closest point. There are no Local Nature Reserves within 500m of Site 8. There is an Ancient Woodland within 500m of Site 8 to the east of the eastern most extent of the site. There are some scattered wooded areas within the north eastern parcel of Site 8 however much of the site is open agricultural land which may support ground nesting bird species.		There are no International Designations within 5km of Site 9. There are no National ecological statutory designated sites within the Site 9 boundary or within the 2km study area. The closest statutory designated site is 'Swanholme Lakes' Site of Special Scientific Interest (SSSI) which is located approximately 4.0km to the north-east of Site 9 at its closest point. Whisby Nature Park Local Nature Reserve (LNR) is located approximately 340m north of Site 9. There is an area of Ancient Woodland immediately north of Site 9 (Tunman Wood). There are some scattered trees within Site 9, there are also areas of woodland bordering the site, much of the site is open agricultural land which may support ground nesting bird species.
Landscape and Visual		The site is not located within or in close proximity to a National Landscape designation. However, the eastern extents of Site 6 are located within and adjacent to the 'Lincoln Cliff Area of Great Landscape Value'. Site 6 is intersected by a number of PRoWs, particularly within the western most parcel.		The site is not located within or in close proximity to a National Landscape designation. However, the eastern extents of Site 7 are located within 1km of the 'Lincoln Cliff Area of Great Landscape Value'. Site 7 is intersected by a number of PRoWs, within the majority of land parcels.		The site is not located within or in close proximity to a National Landscape designation. However, the western extents of Site 8 border of the 'Lincoln Cliff Area of Great Landscape Value'. The site is intersected by multiple PRoW, particularly within the southern part of Site 8.		The site is not located within or in close proximity to a National Landscape designation. The site is intersected by multiple PRoW and existing permissive paths. Residential Receptors are located within the villages of Thorpe on the Hill, Witham St Hughs, Aubourn, and Bassingham, which are in close

Indicator	Site 6		Site 7		Site 8		Site 9	
		Residential Receptors are located within the villages of Coleby, Harmston and Aubourn, which are in close proximity to the site, particularly the south eastern extent of the site surrounds the village of Coleby. There are also several scattered residential properties located throughout the site.		Residential Receptors are located within the villages of Bassingham, Cartlon-le-Moorland and Brant Broughton, which are in close proximity to the site, particularly the western most extent of the site borders the village of Bassingham which lies to the west. There are also several scattered residential properties located throughout the site.		Residential Receptors are located within the villages of Navenby, Wellingore, Boothby Graffoe, Scopwick and Ashby-de-la-Launde, which are in close proximity to the site, particularly the western and eastern most extents of Site 8 which border villages. The eastern extent of the site also surrounds RAF Digby which would be an important consideration. There are also several scattered residential properties located throughout the site.		proximity to Site 9. There is a caravan park immediately adjacent to the northern section of Site 9. There are also several scattered residential properties located throughout the site.
Cultural Heritage		There are no listed buildings within the Site 6 parcels, however a number of Grade II listed buildings are located within Coleby which is bordered by the southern and eastern parcels of Site 6. Suitable buffers would need to be accounted for in the siting of solar infrastructure, to ensure there is no impact on the setting of these heritage assets. There are no Conservation Areas, Registered Parks and Gardens or Registered Battlefields within 500m of Site 6. Site 6 is not located within an APA. The 'Somerton House' Scheduled Monument is located to the south west of the southern parcel of Site 6. Appropriate mitigation and buffers would be needed to avoid impacting this heritage asset. Due to the heritage constraints in proximity to Site 6, and accounting for the appropriate buffers that would be required from heritage assets to avoid impacting their setting, this would reduce the feasible area for solar infrastructure particularly in the south eastern extent of the site.		There are a number of Grade II listed buildings within the north eastern parcel of Site 7, associated with Somerton Castle. There are also clusters of Grade II Listed Buildings within Bassingham which borders the western most parcels. Suitable buffers would need to be accounted for in the siting of solar infrastructure, to ensure there is no impact on the setting of these heritage assets. There are no Conservation Areas, Registered Parks and Gardens or Registered Battlefields within 500m of Site 7. Site 7 is not located within an APA. The 'Somerton House' Scheduled Monument is located within the western most parcel of Site 7. Appropriate mitigation and buffers would be needed to avoid impacting this heritage asset and its setting. Due to the heritage constraints in proximity to Site 7, and accounting for the appropriate buffers that would be required from heritage assets to avoid impacting their setting, this would substantially reduce the feasible area		There is one Grade II listed building within the eastern extent of Site 8. There are also several listed buildings within Scopwick which borders Site 8 to the east, some of which are immediately adjacent to the eastern most parcels. Suitable buffers would need to be accounted for in the siting of solar infrastructure, to ensure there is no impact on the setting of these heritage assets. There are no Conservation Areas, Registered Parks and Gardens or Registered Battlefields within 500m Site 8 however there are Conservation Areas within Navenby, Boothby Graffoe, Wellingore and Scopwick which are in proximity to Site 8. Site 8 is not located within an APA. There are no Scheduled Monuments within or within 500m of Site 8. Due to the heritage constraints in proximity to Site 8, and accounting for the appropriate buffers that would be required from heritage		A single Grade II listed building is located within a land parcel excluded from but surrounded by Site 9. There are other listed buildings in proximity to Site 9, scattered around the boundary of the site and within Bassingham, Aubourn and Thorpe on the Hill. Suitable buffers would need to be accounted for in the siting of solar infrastructure, to ensure there is no impact on the setting of these heritage assets. Site 9 passes across the A46 which is a Roman Heritage Asset and may have associated buried heritage constraints. There are no Registered Parks and Gardens or Registered Battlefields within 500m of Site 9, however the Bassingham Conservation Area is located within 500m. Site 9 is not located within an APA. The 'Hall Close' Scheduled Monument is located immediately east of the eastern extent of Site 9. Appropriate mitigation and buffers would be needed to avoid impacting this heritage asset.

Indicator	Site 6		Site 7		Site 8		Site 9	
				for solar infrastructure particularly in the north eastern extent of the site.		assets to avoid impacting their setting, this may reduce the feasible area for solar infrastructure particularly in the eastern extent of the site.		Due to the heritage constraints present within and adjacent to Site 9, accounting for the appropriate buffers that would be required from heritage assets, this may reduce the feasible area for solar infrastructure particularly in the eastern extent of the site.
Access for Construction Traffic		Site 6 is largely accessible via local roads but is in proximity to the A607 and the A15. Although construction traffic would be able to use the nearby A Roads, travel along minor local roads would also be required to reach the Site. Mitigation would likely be required on minor roads to enable traffic to travel to the Site.		Site 7 is largely accessible via local roads but is in proximity to the A607 and the A15. Although construction traffic would be able to use the nearby A Roads, traffic movements along minor local roads would be required to reach the site. Mitigation would likely be required on minor roads to enable traffic to travel to the site.		Site 8 is largely accessible via the A15, there would also be some travel to Site required via local roads. Mitigation may be required to ensure construction traffic is able to access the Site safely from the A15.		Site 9 is largely accessible via the A46, there would be some travel to Site required via local roads. Mitigation may be required to ensure construction traffic is able to access the site safely from the A46 but overall construction traffic access links to the strategic road network are accessible.
Flood Risk		The majority of the western parcel of Site 6 is located within Flood Zone 3, which constitutes a large part of Site 6. Solar infrastructure such as batteries and substations should not be located within Flood Zone 3 where possible. The remaining parcels are located within Flood Zone 1. The River Brant passes through the western extent of Site 6 and may have associated flooding.		The majority of Site 7 is located within Flood Zones 2 and 3. Part of the site is also located within a water storage area. The River Brant passes in proximity to the eastern parcels of Site 7; therefore flooding may occur near to these parcels of the site. There are no other notable surface waterbodies within the site.		The majority of Site 8 is located within Flood Zone 1. Part of the south eastern extent of the site is located within Flood Zone 3, near Scopwick. There are no notable surface waterbodies within Site 8.		The majority of Site 9 is located within Flood Zone 1 and there are some areas of Flood Zone 2 and 3 across the site, particularly in the south west and eastern extents. The River Witham and River Brant pass through Site 9 and there are other watercourses within the site.
Solar Array Shading		There are areas of woodland associated with the western parcel of Site 6 which would provide shading to any solar infrastructure proposed in this area. This parcel of the site is the largest and so shading in this area would present a constraint to the amount of solar that could feasibly be built in this area. However, much of the remaining land parcels in Site 6 are open agricultural land with minimal nearby woodland.		There are limited areas of dense woodland within Site 7. There are some scattered clusters of trees within the north eastern parcel associated with Somerton Castle but overall the site comprises mainly open agricultural land.		There are limited areas of woodland within Site 8. There are some scattered clusters of trees within the north eastern parcel but overall the site comprises mainly open agricultural land.		There are limited areas of woodland within Site 9, though there is a large woodland area which borders part of the northern boundary of Site 9 which may shade part of the site. There are some scattered clusters of trees throughout Site 9 however, site comprises mainly open agricultural land.
Topography		Less than 3% gradient.		Less than 3% gradient.		Less than 3% gradient.		Less than 3% gradient.
Site Size		The site is approximately 650 ha and therefore the site would not, on its own, be large enough to accommodate the Proposed Development. It is however in close proximity to Sites 7, 8 and 9 so		The site is approximately 790 ha and therefore it would not, on its own, and accounting for environmental constraints, be large enough to accommodate the Proposed		The site is approximately 1,920 ha and therefore it would be large enough to accommodate the Proposed Development. However, the site is made up of many land		The site is approximately 1,065 ha and therefore it is considered to be of sufficient size to accommodate the Proposed Development. Site 9 is also

Indicator	Site 6		Site 7		Site 8		Site 9	
		could be combined with another site however this would cause the site to be fragmented. Further technical assessment to confirm this would be required.		Development. It is however in close proximity to Sites 7, 8 and 9 so could be combined with another site however as the site is made up of many smaller land parcels and is fragmented, combining the site would cause the site to be further fragmented. Further technical assessment to confirm this would be required.		parcels and is fragmented. Further technical assessment to confirm this would be required.		one continuous site and is not fragmented.

Appendix B National Policy Accordance Tables

Overarching National Policy Statement for Energy (EN-1) (November 2023)

Policy paragraph	Policy description	Compliance commentary
Paragraph 2.1.3	To produce the 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 a local and national scale. High quality infrastructure is crucial for economic growth, boosting productivity and competitiveness. Part 3 of this NPS provides further details on the need for - and importance of - energy to economic prosperity and social well-being.	NPS EN-1 acknowledges the significant amount of high quality infrastructure required to provide the energy the UK requires. As set out in the **Statement of Need [EN010154/APP/7.1]** the Proposed Development comprises infrastructure defined as being of critical national priority and provides substantial benefits. These include the production of urgently needed low carbon renewable electricity which contributes to the government's net zero obligations and decarbonisation aims, the provision of ecological enhancements and permissive paths, and job creation and economic growth, as set out in Section 5.3 of the **Planning Statement [EN010154/APP/7.2].** The **Design Approach Document [EN010154/APP/7.3]** demonstrates how the design of the Proposed Development has evolved with a clear Design Vision and Design Principles, resulting in positive outcomes including the delivery of sustainable infrastructure that is sensitive to place.
Net Zero by 2050		
Paragraph 2.2.1	In June 2019, the UK became the first major economy to legislate for a 2050 net zero Greenhouse Gases ('GHG') emissions target through the Climate Change Act 2008 (2050 Target Amendment) Order 2019. In December 2020, the UK communicated its Nationally Determined	In accordance with the UK's established need to reduce greenhouse gas (GHG) emissions, the Proposed Development demonstrates the positive contribution it makes towards reducing GHG emissions as detailed within Section 6 of the **Statement of Need**

Policy paragraph	Policy description	Compliance commentary
	Contributions to reduce GHG emissions by at least 68 per cent from 1990 levels by 2030. In April 2021, the government legislated for the sixth carbon budget (CB6), which requires the UK to reduce GHG emissions by 78 per cent by 2035 compared to 1990 levels.	**[EN010154/APP/7.1]** and Section 5.3 of the **Planning Statement [EN010154/APP/7.2]**. **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** presents a lifecycle GHG impact assessment over the lifetime of the Proposed Development and demonstrates the Proposed Development substantially exceeds net zero requirements, reducing GHG emissions to have an overall positive climate impact. The operational phase of the Proposed Development is shown to have a significant beneficial residual effect with regard to GHG impacts. This demonstrates the contribution the Proposed Development makes to the UK's transition to net zero.
Meeting Net Zero		
Paragraph 2.3.1	Energy underpins almost every aspect of our way of life. It enables us to heat and light our homes; to manufacture goods; to produce and transport food; and to travel to work and for leisure. Our businesses and jobs rely on the use of energy. Energy is essential for the critical services we rely on – from hospitals to traffic lights and mobile devices. It is difficult to overestimate the extent to which our quality of life is dependent on adequate energy supplies.	The vital need for energy is supported by the Proposed Development given its ability to contribute towards meeting the growing energy demand. Section6 of the **Statement of Need [EN010154/APP/7.1]** details the benefits of solar power in meeting this need as a scalable technology capable of rapid deployment. Section 5.3 of the **Planning Statement [EN010154/APP/7.2]** further highlights the contribution

Policy paragraph	Policy description	Compliance commentary
		the Proposed Development will make to low carbon renewable energy generation.
Paragraph 2.3.2	In October 2021 the government published the Net Zero Strategy. This set out our vision for transitioning to a net zero economy and the policies and proposals for decarbonising all sectors of the UK economy to meet our net zero target by 2050, making the most of new growth and employment opportunities across the UK.	Paragraph 5.1.3 of the **Statement of Need [EN010154/APP/7.1]** states *"without a substantial increase in additional low-carbon electricity generating capacity, the urgent requirement for decarbonisation of transport, heating, and industry infrastructure is unlikely to be achieved, threatening the UK's ability to achieve its legally binding target of net zero by 2050. Increasing solar generation is critical to the provision of adequate low-carbon electricity to meet increasing demands."* To achieve net zero by 2050 in accordance with the Net Zero Strategy: Build Back Greener, adequate low-carbon electricity is required. Section 5.3 of the **Planning Statement [EN010154/APP/7.2]** further demonstrates the benefits of the Proposed Development, including those in relation to job creation and economic growth.
Paragraph 2.3.3	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 Nationally Determined Contribution. This will require a step change in the decarbonisation of our energy system	The Proposed Development contributes positively to energy security, reliability, and affordability of supply. Sections 5 and 6 of the **Statement of Need [EN010154/APP/7.1]** explains how the Proposed Development, as solar photovoltaic (PV) infrastructure, will contribute towards the government's net zero obligations and decarbonisation aims. Sections 6.2 and

Policy paragraph	Policy description	Compliance commentary
		6.3 of the **Statement of Need [EN010154/APP/7.1]** detail the benefits the Proposed Development, as solar PV infrastructure, will have on affordability, reliability, and security of supply. This is also summarised in Section 5.2 of the **Planning Statement [EN010154/APP/7.2]**. **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** presents a lifecycle GHG impact assessment with consideration of the carbon budgets over the lifetime of the Proposed Development. The assessment demonstrates the Proposed Development contributes positively to the UK meeting its legally binding carbon budgets.
Paragraph 2.3.4	Meeting these objectives necessitates a significant amount of new energy infrastructure, both large national significant developments and small-scale developments determined at a local 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 primary fuels and energy carriers 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	The Proposed Development will contribute to meeting the government's objectives to ensure the supply of energy remains secure, reliable, affordable as it comprises a nationally significant infrastructure project that will generate low carbon renewable energy and also store energy through the inclusion of a Battery Energy Storage System (BESS). Jobs will be created as a result of construction and operation of the Proposed Development. **Chapter 12: Socio-Economic and Land Use** of the ES **[EN010154/APP/6.1]** states that it is estimated that the Proposed Development will require a peak of 600 full-time equivalent (FTE) jobs, and an average of 350 gross direct FTE jobs onsite over the 24-month construction

Policy paragraph	Policy description	Compliance commentary
		period, although in practice the number will vary across the period. The jobs created will be in the renewable energy sector, specifically relating to solar installation, but also electricity transmission and supply chain. As such, they will contribute to the development of skills needed for the UK's transition to net zero by 2050 (as required by the Climate Change Act 2008 (2050 Target Amendment) Order) 2019 and described within the Net Zero Strategy: Build Back Greener. Further opportunities that could be taken forward post consent are set out within the **Framework Employment, Skills and Supply Chain Plan (ESSCP) [EN010154/APP/7.16]**. Section 5.3 of the **Planning Statement [EN010154/APP/7.2]** also explain the benefits arising from the Proposed Development regarding job creation and economic growth. Section 8 of the **Statement of Need [EN010142/APP/7.1]** notes the meaningful and timely contributions offered by the Proposed Development to UK decarbonisation and security of supply, while helping lower bills for consumers throughout its operational life, which will be critical on the path to net

Policy paragraph	Policy description	Compliance commentary
		zero beyond delivery of the government's 'Clean Power by 2030' mission.
Paragraph 2.3.5	The sources of energy we use are changing. Since the industrial revolution, our energy system has been dominated by fossil fuels. That remains the case today. Although representing a record low, fossil fuels still accounted for just over 76 per cent of energy supply in 2020. We need to dramatically increase the volume of energy supplied from low carbon sources.	The Proposed Development would contribute towards the production of low-carbon electricity generation in order to order to dramatically increase the volume of energy from low carbon supplies. Section 8 of the **Statement of Need [EN010154/APP/7.1]** notes that the Proposed Development is required to ensure that the UK remains on track to meet its legally binding carbon emissions reduction targets, while enhancing national security of supply, at a cost which, in relation to other electricity generation infrastructure developments, provides value for money for end-use consumers.
Paragraph 2.3.6	We need to transform the energy system, tackling emissions while continuing to ensure secure and reliable supply, and affordable bills for households and businesses. This includes increasing our supply of clean energy from renewables, nuclear and hydrogen manufactured using low carbon processes (low carbon hydrogen), and, where we still emit carbon, developing the industry and infrastructure to capture, transport and store it.	The Proposed Development will contribute towards increasing the UK's supply of clean energy from renewables, whilst contributing to decarbonisation, and energy security and reliability of supply. Sections 5 and 6 of the **Statement of Need [EN010154/APP/7.1]** highlight the role of the Proposed Development in meeting decarbonisation aims, increasing production of renewable energy sources, and providing increased energy security. Section 5 of the **Statement of Need [EN010154/APP/7.1]** notes new solar developments

Policy paragraph	Policy description	Compliance commentary
		such as the Proposed Development are not only needed to decarbonise electricity supply but also to ensure generation capacity keeps pace with the expected growth in demand, as surface transport, heating and industrial process energy end uses will be required to be electrified. Government and industry forecasts expect UK annual electricity demand to approximately double by 2050. Enabling electrification also supports security of supply by helping reduce the national dependency on imported hydrocarbon source fuels. As such, the Proposed Development will therefore also help reduce the UK's exposure to volatile international energy prices. The inclusion of a BESS within the Proposed Development will help it to operate flexibly as an essential part of a zero-carbon electricity and energy system. The Proposed Development will provide opportunities for the National Energy System Operator (NESO) to manage any potential power flow constraints on the National Electricity Transmission System (NETS) in the vicinity of the Proposed Development over its operational life. Hence, the meaningful and timely contributions offered by the Proposed Development 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

Policy paragraph	Policy description	Compliance commentary
		beyond delivery of the government's 'Clean Power by 2030' mission.
Paragraph 2.3.7	Decarbonisation 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. Low carbon hydrogen is also likely to play an increasingly significant role	As renewable energy development, the Proposed Development will contribute towards meeting electricity demand, whilst also helping to facilitate decarbonisation. The benefits of the Proposed Development including the production of low carbon renewable energy, decarbonisation are set out in Section 5.3 of the **Planning Statement [EN010154/APP/7.2]**. Section 5 of the **Statement of Need [EN010154/APP/7.1]** explains how electrification will contribute towards achieving net zero, and how solar PV such as the Proposed Development will contribute to achieving electrification. It further notes the Proposed Development is required to ensure that the UK remains on track to meet its legally binding carbon emissions reduction targets, while enhancing national security of supply, and at a cost which, in relation to other electricity generation infrastructure developments, provides value for money for end-use consumers.
Paragraph 2.5.1	Given the vital role of energy to economic prosperity and social well-being, it is important that our supplies of energy remain secure, reliable and affordable.	The Proposed Development will contribute towards increasing the UK's supply of clean energy from renewables, whilst contributing to decarbonisation, and security, reliability and affordability of supply.

Policy paragraph	Policy description	Compliance commentary
		Section 6.2 of the **Statement of Need [EN010154/APP/7.1]** highlights how the Proposed Development will contribute towards security of supply and Section 6.3 of the **Statement of Need [EN010154/APP/7.1]** highlights how the Proposed Development will contribute towards affordability.
Paragraph 2.5.5	However as global energy costs rise due to demand soaring as the economy reopened after COVID-19 and the Russian invasion of Ukraine, security of supply requires a greater focus on domestic energy production.	As set out in Section 6.2of the **Statement of Need [EN010154/APP/7.1]** recent geopolitical events, including the global energy price crisis of 2022–2023, have underscored the need to enhance domestic energy resilience. Solar generation strengthens energy security by producing electricity close to demand, using a UK-based, renewable resource that is not subject to global fuel markets.
Paragraph 2.5.6	The British Energy Security Strategy emphasises the importance of addressing our underlying vulnerability to international energy prices by reducing our dependence on imported oil and gas, improving energy efficiency, remaining open minded about our onshore reserves including shale gas, and accelerating deployment of renewables, nuclear, hydrogen, CCUS, and related network infrastructure, so as to ensure a domestic supply of clean, affordable, and secure power as we transition to net zero.	The Proposed Development will contribute towards reducing reliance on imported oil and gas by increasing the UK's supply of clean energy from renewables, whilst contributing to decarbonisation, energy security and reliability of supply. Sections 5 and 6 of the **Statement of Need [EN010154/APP/7.1]** highlight the role of the Proposed Development in meeting decarbonisation aims, increasing production of renewable energy sources, and providing increased energy security.

Policy paragraph	Policy description	Compliance commentary
Paragraph 3.1.2	However, it will not be possible to develop the necessary amounts of such infrastructure without some significant residual adverse impacts. These effects will be minimised by the application of policy set out in Parts 4 and 5 of this NPS. See also Part 2 of each technology specific NPS.	As acknowledged in NPS EN-1, developing the required infrastructure to meet the UK's energy objectives will not be possible without some significant residual adverse impacts. The Applicant has considered impacts to the environment from an early design phase. A summary of environmental effects is found within **Chapter 16: Summary of Significant Environmental Effects** of the ES **[EN010154/APP/6.1]**. As explained in **Chapter 5: EIA Methodology and Consultation** of the ES **[EN010154/APP/6.1]** the Applicant has applied the mitigation hierarchy and sought to minimise adverse impacts through embedded and additional mitigation measures. Efforts to minimise adverse effects through design are set out in Section 4.5 of the **Design Approach Document [EN010154/APP/7.3]**, whilst details of impact specific mitigation measures are summarised in the **Environmental Commitments Register [EN010154/APP/6.5]**. The need and benefits of the Proposed Development have been weighed against any residual adverse impacts in Section 7 of the **Planning Statement [EN010154/APP/7.2].** This demonstrates there are no adverse impacts of sufficient weight, either on their own or collectively, that would mean that the DCO should not be made. The harm identified to designated and non-designated heritage assets, landscape character, and visual amenity, from the temporary loss of agricultural land used for food production, is clearly outweighed by

Policy paragraph	Policy description	Compliance commentary
		the substantial public benefit that would arise from the provision of low carbon energy to meet the need identified in the NPSs. The Applicant notes that, in accordance with this policy, the need for infrastructure such as the Proposed Development is urgent, and the Secretary of State should give substantial weight to this need in decision-making
Paragraph 3.2.3	It is not the role of the planning system to deliver specific amounts or limit any form of infrastructure covered by this NPS. It is for industry to propose new energy infrastructure projects that they assess to be viable within the strategic framework set by government. This is the nature of a market-based energy system. With the exception of new coal or large-scale oil-fired electricity generation, the government does not consider it appropriate for planning policy to set limits on different technologies but planning policy can be used to support the government's ambitions in energy policy and other policy areas.	The Proposed Development has been brought forward by a partnership of Windel Energy and Recurrent Energy on the basis that it is a viable project, as anticipated by paragraph 3.2.3. The **Statement of Need [EN010154/APP/7.1]** demonstrates that utility-scale solar generation is economically and technically viable in the UK, and that it is an economically and technically preferable source of low-carbon energy for electricity consumers. The **Statement of Need [EN010154/APP/7.1]** also reviews the existing legislative and policy situation as it affects the development of new electricity generation and storage capacity, with specific reference to the urgent need to decarbonise the United Kingdom power supply in support of the UK's legally binding emissions reduction targets.
Paragraph 3.2.4	It is not the government's intention in presenting any of the figures or targets in this NPS to propose limits on any	It is noted that the government's intention is not to propose limits on new infrastructure. The definition of

Policy paragraph	Policy description	Compliance commentary
	new infrastructure that can be consented in accordance with the energy NPSs. 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. Consenting new projects also enables projects utilising more advanced technology and greater efficiency to come forward. 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.	Critical National Priority (CNP) infrastructure is provided at Paragraph 4.2.5 of NPS EN-1 and includes all onshore and offshore electricity generation that does not involve fossil fuel combustion, such as the Proposed Development. As set out within the **Statement of Need [EN010154/APP/7.1]**, the Proposed Development, as solar PV, will offer one of the most cost-effective electricity generation technologies with low running costs and long-term price stability. Additionally, competitiveness continues to improve due to improved efficiencies, declining module costs, and operational simplicity. Section 6 of the **Statement of Need [EN010154/APP/7.1]** details the importance of solar power in the achievement of the UK's energy objectives. This section demonstrates how the Proposed Development will contribute towards delivering an affordable electricity system with competitive advantages relating to provision when compared to other low-carbon technologies.
Paragraph 3.2.5	The government has other mechanisms to influence the delivery of its energy objectives and imposing limits on the consenting of different types of energy infrastructure would reduce competition, increase costs, and disincentivise newer, more efficient solutions coming forward. This does not reduce the need for individual	The **ES [EN010154/APP/6.1/6.2/6.3]** and Section 2 of the **Planning Statement [EN010154/APP/7.2]** note the legislative and policy requirements relevant to the Proposed Development.

Policy paragraph	Policy description	Compliance commentary
	projects to demonstrate compliance with planning and environmental requirements or mean that everything that obtains development consent will get built.	Sections 6 and 7 of the **Planning Statement [EN010154/APP/7.2]** demonstrate how the Proposed Development complies with the requirements of national and local planning policy detailed in Section 2.
Paragraph 3.2.6	**The Secretary of State should assess all applications for development consent for the types of infrastructure covered by the energy this NPSs on the basis that the government has demonstrated that there is a need for those types of infrastructure which is urgent, as described for each of them in this Part.** [Bold formatted in NPS EN-1]	The Applicant notes that, in accordance with paragraph 3.2.6, the need for infrastructure such as the Proposed Development is acknowledged and is urgent. The definition of CNP infrastructure is provided at Paragraph 4.2.5 of NPS EN-1 and includes all onshore and offshore electricity generation that does not involve fossil fuel combustion, such as the Proposed Development. This need for is set out within the **Statement of Need [EN010154/APP/7.1]** which concludes that the Proposed Development as CNP is required to ensure that the UK remains on track to meet its legally binding carbon emissions reduction targets, while enhancing national security of supply, and at a cost which, in relation to other electricity generation infrastructure developments, provides value for money for end-use consumers. The urgent need for the Proposed Development, as development to be consented under the Planning Act 2008 (PA 2008), should be afforded substantial weight as indicated by paragraph 3.2.7.
Paragraph 3.2.7	**In addition, 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.** [Bold formatted in NPS EN-1]	

Policy paragraph	Policy description	Compliance commentary
		The **Statement of Need [EN010154/APP/7.1]** demonstrates the contribution the Proposed Development will make to the UK's energy objectives through helping to ensure that the UK remains on track to meet its legally binding carbon emissions reduction targets, while enhancing national security of supply, and at a cost which, in relation to other electricity generation infrastructure developments, provides value for money for end-use consumers. Section 6 of the **Planning Statement [EN010154/APP/7.2]** provides an appraisal of the Proposed Development against national and local planning policy and Section 7 of the **Planning Statement [EN010154/APP/7.2]** considers the planning balance. This concludes that the substantial benefits of the Proposed Development clearly and demonstrably outweigh the harms that would arise with the proposed mitigation measures in place. Adverse effects would be localised, short-term, temporary and/or reversible at the end of the Proposed Development's lifetime. Hence, the Proposed Development is in accordance with national energy policy, national planning policy and the relevant development plan documents when considered as a whole.
Paragraph 3.2.8	**The Secretary of State is not required to consider separately the specific contribution of any individual**	It is noted that the Secretary of State is not required to consider the specific contribution of any individual project to satisfying the need established in NPS EN-1.

Policy paragraph	Policy description	Compliance commentary
	project to satisfying the need established in this NPS. [Bold formatted in NPS EN-1]	Notwithstanding, the **Statement of Need [EN010154/APP/7.1]** clearly sets out the need for the Proposed Development, stating that it will provide an essential contribution to meeting the governmental objectives of delivering utility-scale infrastructure to enable decarbonisation. By doing so, the Proposed Development will address the climate emergency that affects everyone's lives and the environment, by ensuring the UK's energy supply is secure, low-carbon and low-cost. The Proposed Development will contribute to the UK remaining on track to meet its legally binding carbon emissions reduction targets, while enhancing national security of supply, and at a cost which, in relation to other electricity generation infrastructure developments, provides value for money for end-use consumers. Section 8 of the **Statement of Need [EN010154/APP/7.1]** also sets out that new solar developments such as the Proposed Development are not only needed to decarbonise electricity supply but also ensure generation capacity keeps pace with the expected growth in demand, as surface transport, heating and industrial process energy end uses will be required to be electrified. Government and industry forecasts expect UK annual electricity demand to approximately double by 2050.

Policy paragraph	Policy description	Compliance commentary
		Furthermore, Section 8 of the **Statement of Need [EN010154/APP/7.1]** goes on to state that enabling electrification also supports security of supply by helping reduce the national dependency on imported hydrocarbon source fuels. As such, the Proposed Development will therefore also help reduce the UK's exposure to volatile international energy prices. Inclusion of a BESS within the Proposed Development will help it operate flexibly as an essential part of a zero-carbon electricity and energy system. The Proposed Development will provide opportunities for NESO to manage any potential power flow constraints on the NETS in the vicinity of the Proposed Development over its operational life.
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.	The Proposed Development contributes towards meeting the expected increase in electricity demand as explained in Section 5 of the **Statement of Need [EN010142/APP/7.1]** and Section 5 of the **Planning Statement [EN010154/APP/7.2].** The **Statement of Need [EN010154/APP/7.1]** recognises this increase in demand and demonstrates in Section 5 that new solar developments such as the Proposed Development are not only needed to decarbonise electricity supply but also ensure generation capacity keeps pace with the expected growth in demand, as surface transport, heating and

Policy paragraph	Policy description	Compliance commentary
		industrial process energy end uses will be required to be electrified.
Paragraph 3.3.12	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. 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.	This policy clearly sets out that while decentralised and community energy schemes, such as rooftop solar, can contribute to targets, it will not replace the need for new large-scale electricity infrastructure. The Proposed Development comprises a large-scale energy generation facility and as detailed within Section 6.2 of the **Statement of Need [EN010154/APP/7.1]**, it will contribute to the security of energy supply. The Proposed Development also includes for provision of a distributed BESS or centralised BESS. The distributed BESS would increase the operational efficiency of the solar PV panels by ensuring that energy generated can be stored when demand is low. The centralised BESS will also have the ability to import power from the grid directly, to allow the BESS system to help support the grid through grid balancing mechanisms.
Paragraph 3.3.13	The Net Zero Strategy sets out the government's ambition for increasing the deployment of low carbon energy infrastructure consistent with delivering our carbon budgets and the 2050 net zero target. This made clear the commitment that the cost of the transition to net zero should be fair and affordable.	The Proposed Development comprises low carbon energy infrastructure that contributes towards the delivery of the UK's carbon budgets and the 2050 net zero target. Section 6 of the **Statement of Need [EN010154/APP/7.1]** details the importance of solar power in the delivery of net zero and the achievement of the UK's carbon targets. Section 6.1 of the **Statement**

Policy paragraph	Policy description	Compliance commentary
		of Need [EN010154/APP/7.1] demonstrates that solar power is a key enabler of this shift. It is a proven, scalable technology capable of rapid deployment with minimal environmental impact and low operational emissions. Section 5.2 of the **Statement of Need [EN010154/APP/7.1]** considers affordability. and it comments on the unique benefits of solar energy, which make it advantageous in comparison to other low-carbon technologies and therefore beneficial to closing the UK's emissions gap in the 2030s. Section 6.3 of the **Statement of Need [EN010154/APP/7.1]** expresses the favourability of solar energy regarding its contribution to improving energy affordability as one of the most cost-effective methods of electricity generation. It further notes that analysis by the government and independent institutions consistently shows that utility-scale solar has a lower levelised cost of energy than fossil gas generation, new nuclear, offshore wind, or emerging technologies such as hydrogen-fired turbines.
Paragraph 3.3.16	If demand for electricity doubles by 2050, we will need a fourfold increase in low carbon generation and significant expansion of the networks that transport power to where it is needed. In addition, we committed in the Net Zero Strategy to take action so that by 2035, all our electricity will come from low carbon sources, subject to security of	Section 6 of the **Statement of Need [EN010154/APP/7.1]** and Section 5 of the **Planning Statement [EN010154/APP/7.2]** demonstrate that the Proposed Development will make a contribution to

Policy paragraph	Policy description	Compliance commentary
	supply, whilst meeting a 40-60 per cent increase in electricity demand. This means that the majority of new generating capacity needs to be low carbon.	increasing energy supply and security whilst contributing to the delivery of net zero. The **Statement of Need [EN010154/APP/7.1]** concludes that new solar developments such as the Proposed Development are not only needed to decarbonise electricity supply but also to ensure generation capacity keeps pace with the expected growth in demand, as surface transport, heating and industrial process energy end uses will be required to be electrified. It further details how the inclusion of energy storage within the Proposed Development enhances its contribution to system security by increasing the utilisation of solar capacity; reducing curtailment; and supporting frequency response and reserve services. The GHG assessment contained within **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** identifies a significant beneficial residual effect for the Proposed Development during operation. It further concludes the payback period for the whole lifecycle carbon of the Proposed Development is twelve years of operation, with further carbon savings delivered for each subsequent year of operation. This demonstrates the contribution that the Proposed Development will have towards the UK meeting its legally binding carbon budgets over its 60-year operational phase.

Policy paragraph	Policy description	Compliance commentary
Paragraph 3.3.19	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 [EN010154/APP/7.1]**, large scale solar is expected to be an important part of the diverse energy mix as required by this policy. Section 6.2 of the **Statement of Need [EN010154/APP/7.1]** notes that solar generation provides complementary output to other renewable sources, particularly wind. This generation diversity improves the overall reliability of the renewable fleet. Additionally, when solar is deployed as part of a geographically dispersed portfolio, its output becomes more predictable and contributes to the adequacy of the national electricity supply. The integration of solar into the broader energy system therefore somewhat strengthens supply-side resilience and reduces dependence on individual technologies.
Paragraph 3.3.20	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.	It is noted that the policy acknowledges solar as one of the predominant sources of electricity generation to contribute to a secure, reliable, affordable, net zero consistent system. The Proposed Development would produce low carbon renewable energy. Section 6.2 of the **Statement of Need [EN010154/APP/7.1]** explains the ability of solar power to improve the security of supply. Section 6.3 of the **Statement of Need [EN010154/APP/7.1]** details that Solar PV is one of the most cost-effective electricity generation technologies

Policy paragraph	Policy description	Compliance commentary
		available in the UK today. It further explains competitiveness continues to improve due to declining module costs, improved efficiencies, and operational simplicity. Additionally, the low operational costs, enable long-term price stability and reduced exposure to commodity price risk. **The Statement of Need [EN010154/APP/7.1]** concludes that enabling electrification also supports security of supply by helping reduce the national dependency on imported hydrocarbon source fuels. As such, the Proposed Development will therefore also help reduce the UK's exposure to volatile international energy prices.
Paragraph 3.3.57	Government has committed to reduce GHG emissions by 78 per cent by 2035 under carbon budget 6. According to the Net Zero Strategy this means that by 2035, all our electricity will need to come from low carbon sources, subject to security of supply, whilst meeting a 40-60 per cent increase in demand.	Section 6 of the **Statement of Need [EN010154/APP/7.1]** and Section 5 of the **Planning Statement [EN010154/APP/7.2]** demonstrate the contribution that the Proposed Development will make to increasing energy supply and security whilst facilitating the delivery of net zero. Development consent is sought for the Proposed Development to have an operational term of 60 years. Subject to development consent being granted, the Proposed Development is planned for completion prior to the agreed connection date of 2033, meaning the Proposed Development will contribute towards the 2035 target set out in the Net Zero Strategy: Build Back Greener.

Policy paragraph	Policy description	Compliance commentary
		Chapter 6: Climate Change of the ES **[EN010154/APP/6.1]** considers the UK carbon budgets within its assessment and demonstrates that GHG savings will be achieved throughout the lifetime of the Proposed Development. **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** concludes that the Proposed Development is considered to align with the UK's overall trajectory to net zero. It explains that while some GHG impacts arise from construction and decommissioning, these are determined to have a non-significant effect on the climate and that the Proposed Development is doing enough to align with and contribute to the relevant transition scenario keeping the UK on track towards net zero. Additionally, **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** demonstrates that the Proposed Development results in a significant beneficial effect during operation, with a reduction in atmospheric GHG emissions. **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** further states that the National Grid cannot decarbonise without investment in low carbon electricity generation projects like the Proposed Development, and that without projects such as the Proposed Development the average grid GHG intensity will not decrease, which would adversely affect the UK's ability to meet carbon reduction targets.

Policy paragraph	Policy description	Compliance commentary
Paragraph 3.3.58	Given the urgent 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.	The Proposed Development will contribute to meeting the urgent need for low carbon electricity. Section 5.4 of the **Statement of Need [EN010154/APP/7.1]** highlights that in every scenario a pathway to net zero includes a significant future increase in solar capacity which exceeds that which is installed or developed today. This further demonstrates the particular need for solar energy as part of low carbon renewable energy generation. Section 6.1 of the **Statement of Need [EN010154/APP/7.1]** makes clear the benefits of solar, being one of the few technologies that can realistically support the Government's commitment to 'Clean Power by 2030'. Unlike other low-carbon technologies that face long lead times, complex consenting, or dependency on supply chain development (such as nuclear or carbon capture and storage), solar PV benefits from a short construction window and scalability due to modularity. This enables near-term capacity additions which are essential to closing the UK's emissions gap in the 2030s.
Paragraph 3.3.59	All the generating technologies mentioned above are urgently needed to meet the Government's energy objectives by:	The Proposed Development will contribute to the delivery of net zero, whilst increasing energy supply, security, and affordability, as specified within the government's energy objectives. Section 5 of the **Statement of Need [EN010154/APP/7.1]** explains the substantial benefits

Policy paragraph	Policy description	Compliance commentary
	- providing security of supply (by reducing reliance on imported oil and gas, 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)	of solar energy in relation to security of supply, affordability, and alignment with the UK carbon budgets and decarbonisation. It notes the market competitiveness of Solar PV as one of the most cost-effective electricity generation technologies available in the UK today, which can deliver consumer savings thus reducing the cost of decarbonisation. It further explains how solar energy contributes to energy security through independence from supply chains and global fuel markets, as well as how the inclusion of energy storage within the Proposed Development enhances system security. The **Statement of Need [EN010154/APP/7.1]** concludes that the Proposed Development is required to ensure that the UK remains on track to meet its legally binding carbon emissions reduction targets, while enhancing national security of supply, and at a cost which, in relation to other electricity generation infrastructure developments, provides value for money for end-use consumers. Furthermore, the meaningful and timely contributions offered by the Proposed Development 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 beyond delivery of the government's 'Clean Power by 2030' mission.

Policy paragraph	Policy description	Compliance commentary
Paragraph 3.3.60	Known generation technologies that are included within the scope of this NPS (and would be classed as an NSIP if above the relevant capacity thresholds set out under the Planning Act 2008) include: … Solar PV.	The Proposed Development, as solar PV, has a generating capacity in excess of 50 MW, as set out under the PA 2008. Therefore, the Proposed Development is within the scope of NPS EN-1.
Paragraph 3.3.61	The need for all these types of infrastructure is established by this NPS and is a combination of many or all of them is urgently required for both energy security and Net Zero.	In addition to the need established within NPS EN-1, Section 5 of the **Statement of Need [EN010154/APP/7.1]** demonstrates that the Proposed Development can quickly and affordably contribute to decarbonisation and energy security whilst contributing towards meeting future energy demand.
Paragraph 3.3.62	Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. Section 4.2 states which energy generating technologies are low carbon and are therefore CNP infrastructure.	In accordance with paragraph 3.3.62, the Proposed Development comprises infrastructure to produce low carbon renewable energy and is therefore considered as being of CNP. Section 5 of the **Statement of Need [EN010154/APP/7.1]** outlines the importance of solar power in delivering net zero and its role as a key enabler of this shift.
Paragraph 3.3.63	Subject to any legal requirements, the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP	The policy recognises residual impacts may remain from the provision of CNP infrastructure, but that the benefits will typically outweigh these impacts and should therefore not prevent the quick progression and delivery of such infrastructure. This is the case with the Proposed Development.

Policy paragraph	Policy description	Compliance commentary
	Infrastructure and it should be progressed as quickly as possible.	Section 5 of the **Planning Statement [EN010154/APP/7.2]** sets out the benefits that the Proposed Development delivers, whilst the **Statement of Need [EN010154/APP/7.1]** demonstrates the need for the Proposed Development as CNP infrastructure capable of contributing to the delivery of the government's energy objectives. The **Statement of Need [EN010154/APP/7.1]** concludes that the Proposed Development is required to ensure that the UK remains on track to meet its legally binding carbon emissions reduction targets, while enhancing national security of supply, and at a cost which, in relation to other electricity generation infrastructure developments, provides value for money for end-use consumers. Section 7 of the **Planning Statement [EN010154/APP/7.2]** considers the planning balance including the residual impacts that remain following the application of the mitigation hierarchy. The **Planning Statement [EN010154/APP/7.2]** concludes that the substantial benefits of the Proposed Development clearly and demonstrably outweigh the harms that would arise with the proposed mitigation measures in place. Adverse effects would be localised, short-term, temporary and/or reversible at the end of the Proposed Development's lifetime. As a result, the Proposed Development is in accordance with national energy

Policy paragraph	Policy description	Compliance commentary
		policy, national planning policy and the relevant development plan documents when taken as a whole.
Paragraph 3.3.65	There is an urgent need for new electricity network infrastructure to be brought forward at pace to meet our energy objectives.	This Proposed Development comprises infrastructure that will contribute to a new electricity network and is therefore urgently needed. The ability of the Proposed Development to quickly and effectively meet this need is set out within Section 5 of the **Statement of Need [EN010154/APP/7.1]** which notes the benefits of solar energy as capable of rapid deployment and capable of providing essential near-term capacity additions for closing the UK's emissions gap in 2030. Section 5 of the **Statement of Need [EN010154/APP/7.1]** also sets out the advantageous nature of solar energy in contributing to the delivery of net zero, and increasing affordability and security of supply, in line with the UK's energy objectives.
Paragraph 3.3.66	The security and reliability of the UK's current and future energy supply is highly dependent on having an electricity network which will enable new renewable electricity generation, storage, and interconnection infrastructure that our country needs to meet the rapid increase in electricity demand required to transition to net zero while maintaining energy security. The delivery of this important infrastructure also needs to balance cost to consumers, accelerated timelines for delivery and the minimisation of community and environmental impacts.	As set out in Section 8 of the **Statement of Need [EN010154/APP/7.1]**, the Proposed Development is required to ensure that the UK remains on track to meet its legally binding carbon emissions reduction targets, while enhancing national security of supply, and at a cost which, in relation to other electricity generation infrastructure developments, provides value for money for end-use consumers. Section 6.3 of the **Statement of Need [EN010154/APP/7.1]** specifically addresses how the Proposed Development will contribute towards

Policy paragraph	Policy description	Compliance commentary
		affordability such as through low running costs and no fuel inputs, which enable solar projects to offer long-term price stability and reduced exposure to commodity price risk. The **Statement of Need [EN010154/APP/7.1]** concludes in Section 8 that the meaningful and timely contributions offered by the Proposed Development 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 beyond delivery of the government's 'Clean Power by 2030' mission. The impacts of the Proposed Development have been assessed and considered within the relevant chapters of the ES **[EN010154/APP/6.1/6.2/6.3]**. In particular, **Chapter 5: EIA and Methodology and Consultation** of the ES **[EN010154/APP/6.1]** explains the approach taken. Mitigation measures have been embedded within the design of the Proposed Development to minimise impacts. Where further mitigation is required, this is set out in the **Framework Landscape and Ecological Management Plan (LEMP) [EN010154/APP/7.15], Framework Construction Environmental Management Plan (CEMP) [EN010154/APP/7.7], Framework Operational Environmental Management Plan (OEMP) [EN010154/APP/7.8]**, and **Framework Decommissioning Environmental**

Policy paragraph	Policy description	Compliance commentary
		Management Plan (DEMP) [EN010154/APP/7.9]. The development of a detailed LEMP, CEMP, OEMP, and DEMP is secured under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]** in Requirements 8, 12, 13, and 20**.**
Paragraph 3.3.82	Government has committed to reduce GHG emissions by 78 per cent by 2035 under carbon budget 6. According to the Net Zero Strategy this means that by 2035, all our electricity will need to come from low carbon sources, subject to security of supply, whilst meeting a 40-60 per cent increase in demand.	As acknowledged within the policy, the time sensitive need for low carbon energy generation sources will be vital for the government to remain compliant with the carbon budgets. The contribution of the Proposed Development in facilitating this transition is demonstrated within **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** which shows the operation of the Proposed Development has a residual significant positive effect on GHG emissions. This demonstrates the alignment of the Proposed Development with the UK's Carbon Budgets. Development consent is sought for the Proposed Development to have an operational term of 60 years. Subject to development consent being granted, the Proposed Development is planned for completion prior to the agreed connection date of 2033, meaning the Proposed Development will contribute towards the 2035 target set out in the Net Zero Strategy: Build Back Greener. Section 6.1 of the **Statement of Need [EN010154/APP/7.1]** explains the vital role of solar energy specifically in enabling the transition to net zero. Hence showing the positive contribution the Proposed

Policy paragraph	Policy description	Compliance commentary
		Development will make to the government's energy objectives.
Paragraph 3.3.83	Given the urgent 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.	The Proposed Development comprises CNP infrastructure capable of providing low carbon energy in a timely manner, in accordance with the UK's energy objectives. Should development consent be granted for the Proposed Development, it is anticipated that construction would commence in 2031 with completion of the Proposed Development planned for the agreed connection date of 2033. If construction of the proposed National Grid substation near Navenby is progressed quicker than anticipated, the Proposed Development may commence operation sooner.
Assessment Principles		
Paragraph 4.1.3	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.	The Proposed Development comprises an energy NSIP in accordance with sections 14(1)(a), s15(1) and s15(2) of the PA 2008. Accordingly, the Proposed Development benefits from the presumption in favour of granting consent. Section 6 of the **Planning Statement [EN010154/APP/7.2]** presents an appraisal against national and local planning policy which demonstrates how the Proposed Development complies with relevant policy. As made clear, there are no policy- based grounds for refusing development consent.

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Paragraph 4.1.5	In considering any proposed development, in particular when weighing its adverse impacts against its benefits, the Secretary of State should take into account: - its potential benefits including its contribution to meeting the need for energy infrastructure, job creation, reduction of geographical disparities, environmental enhancements, and any long-term or wider benefits -its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy	The benefits of the Proposed Development are set out in Section 5.3 of the **Planning Statement [EN010154/APP/7.2]** and in summary comprise the production of low carbon renewable energy generation to contribute to the delivery of net zero and the governments decarbonisation aims, ecological enhancements, the provision of permissive paths, job creation, and economic growth. The benefits resulting from the Proposed Development include, but are not limited to: **Decarbonisation** – As set out in **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]**, the Proposed Development indicates an overall lifetime carbon saving, relative to the counterfactual grid average without decarbonisation, of 3,302,906 tCO_2e. The carbon payback period for the whole life carbon emissions (including replacements) is approximately 12 years of operation, with the payback period for construction emissions being approximately 4 years of operation. This will help the UK meet its national and international binding targets including the UK's Carbon Budget and the Nationally Determined Contributions in line with the Paris Agreement. **Environmental Benefits** – The Proposed Development would provide a number of environmental and ecological enhancements, with areas of habitat and biodiversity mitigation and enhancement as well as

Policy paragraph	Policy description	Compliance commentary
		permissive paths delivered as part of the Proposed Development remaining in-situ following decommissioning as set out within the **Framework DEMP [EN010154/APP/7.9]**. The environmental and ecological enhancement measures are set out in the **Framework LEMP [EN010154/APP/7.15]** and **Framework CEMP [EN010154/APP/7.7]**. Additionally, the Proposed Development will provide a minimum 10% Biodiversity Net Gain (BNG), as confirmed in the **Biodiversity Net Gain Report [EN010154/APP/7.12]**. The provision and management of permissive paths is detailed within the **Framework Public Right of Way Management Plan (PRoW-MP) [EN010154/APP/7.14].** The development of a detailed LEMP, CEMP, PRoW-MP and DEMP is secured under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]** at Requirements 8, 12, 18 and 20. **Economic Benefits** – **Chapter 12: Socio-Economic and Land Use** of the ES **[EN010154/APP/6.1]** demonstrates that the Proposed Development will generate a number of jobs through the construction, operation, and decommissioning of the Proposed Development with minor beneficial effects relating to employment and Gross Value Added (GVA) during the construction and decommissioning phases. Additionally, a **Framework ESSCP [EN010154/APP/7.16]** identifies opportunities to upskill the workforce through the consideration of

Policy paragraph	Policy description	Compliance commentary
		apprenticeships, workforce training, and STEM education and careers. The development of skills will contribute towards building the skill set for the renewable energy and low carbon energy sector. These skills are needed for the UK's transition to net zero by 2050, as described within the Net Zero Strategy: Build Back Greener. The **Framework ESSCP [EN010154/APP/7.16]** also considers opportunities to utilise local resources where possible. The development of a detailed **Framework ESSCP [EN010154/APP/7.16]** is secured under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]** at Requirement 19. The potential adverse impacts resulting from the Proposed Development have been assessed and evaluated throughout the **ES [EN010154/APP/6.1/6.2/6.3]**. **Chapter 5: EIA Methodology and Consultation** of the ES **[EN010154/APP/6.1]** confirms that the mitigation hierarchy has been applied, and the **Design Approach Document [EN010154/APP/7.3]** demonstrates how application of the mitigation hierarchy has led to positive design outcomes. **Chapter 15: Cumulative Effects and Interactions** of the ES **[EN010154/APP/6.1]** addresses the potential for cumulative effects and effect interactions as a result of the Proposed Development. It is acknowledged there

Policy paragraph	Policy description	Compliance commentary
		are likely residual cumulative adverse effects in terms of landscape and visual amenity as a result of the Proposed Development. As set out in paragraph 4.2.16 of NPS EN-1 after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. Section 7 of the **Planning Statement [EN010154/APP/7.2]** considers the planning balance, concluding that the substantial benefits of the Proposed Development clearly and demonstrably outweigh the harms that would arise with the proposed mitigation measures in place. Adverse effects would be localised, short-term, temporary and/or reversible at the end of the Proposed Development's lifetime.
Paragraph 4.1.6	In this context, the Secretary of State should take into account environmental, social and economic benefits and adverse impacts, at national, regional and local levels. These may be identified in this NPS, the relevant technology specific NPS, in the application or elsewhere (including in local impact reports, marine plans, and other material considerations as outlined in Section 1.1).	The impacts of the Proposed Development have been assessed and considered within the relevant chapters of the ES **[EN010154/APP/6.1/6.2/6.3]**. Section 5.3 of the **Planning Statement [EN010154/APP/7.2]** sets out the benefits of the Proposed Development which, in summary, include the provision of urgently needed low carbon renewable electricity generation and contribution to the transition to net zero, contribution to the UK's decarbonisation aims, ecological enhancements such as woodland and hedgerow planting, provision of permissive paths to improve connectivity, job creation and economic benefits.

Policy paragraph	Policy description	Compliance commentary
		Section 6 of the **Planning Statement [EN010154/APP/7.2]** provides an appraisal of the Proposed Development against national and local planning policy and Section 7 **considers** the planning balance. This concludes that the substantial benefits of the Proposed Development clearly and demonstrably outweigh the harm that would arise with the proposed mitigation measures in place. Adverse effects would be localised, short-term, temporary and/or reversible at the end of the Proposed Development's lifetime. Hence, the Proposed Development is in accordance with national energy policy, national planning policy and the relevant development plan documents when considered as a whole.
Paragraph 4.1.7	Where this NPS or the relevant technology specific NPSs require an applicant to mitigate a particular impact as far as possible, but the Secretary of State considers that there would still be residual adverse effects after the implementation of such mitigation measures, the Secretary of State should weigh those residual effects against the benefits of the proposed development. For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases. This presumption, however, does not apply to residual impacts which presents an unacceptable risk to, or interference with, human health and public safety, defence, irreplaceable	Section 7.4 of the **Planning Statement [EN010154/APP/7.2]** considers the application of the CNP presumption in relation to the Proposed Development. This demonstrates that the CNP presumption applies as a result of compliance of the Proposed Development with the energy NPSs', application of the mitigation hierarchy, and compliance with other legal and regulatory requirements. In addition, as stated in Section 7 of the **Planning Statement [EN010154/APP/7.2]**, there are no residual impacts as a result of the Proposed Development which would outweigh the need, nor are there any residual impacts which present an unacceptable risk to, or

Policy paragraph	Policy description	Compliance commentary
	habitats or unacceptable risk to the achievement of net zero.	unacceptable interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero.
Paragraph 4.1.8	Where the use of land at a specific location is required to facilitate the development by providing for mitigation and landscape enhancement, an applicant may, as part of its application to the Secretary of State, seek the compulsory acquisition of that land, or rights over that land.	Compulsory acquisition powers are sought where land cannot be secured through voluntary agreement, to clean the title where option agreements are in place and to cover the eventuality of an option agreement being breached. Further details are contained within the **Statement of Reasons [E010154/APP/4.1]**
Paragraph 4.1.12	Other matters that the Secretary of State may consider both important and relevant to their decision-making may include Development Plan documents or other documents in the Local Development Framework.	The Development Plan is set out in Section 2.7 of the **Planning Statement [EN010154/APP/7.2**]. Development Plan policies are considered where relevant in the appraisal of the Proposed Development against national and local planning policy set out in Section 6 of the **Planning Statement [EN010154/APP/7.2]**. Section 2 of the **Planning Statement [EN010154/APP/7.2]** details the legislative and policy context for the Proposed Development including emerging local planning policy which is noted within section 2.7 as being: a. Draft Minerals and Waste Local Plan (Lincolnshire County Council) b. Eagle and Swinethorpe Neighbourhood Plan (draft plan in preparation)
Paragraph 4.1.13	Where the project conflicts with a proposal in a draft Development Plan, the Secretary of State 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.	
Paragraph 4.1.14	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.	

Policy paragraph	Policy description	Compliance commentary
		c. Swinderby Neighbourhood Plan (draft plan in preparation) Section 2.7 of the **Planning Statement [EN010154/APP/7.2]** acknowledges that the Draft Minerals and Waste Local Plan currently has limited weight. Development Plan policies are considered where relevant in the appraisal of the Proposed Development against national and local planning policy set out in Section 6 of the **Planning Statement [EN010154/APP/7.2]**.
Paragraph 4.1.15	In the event of a conflict between these documents and an NPS, the NPS prevails for the purpose of Secretary of State decision making given the national significance of the infrastructure.	The Applicant acknowledges and understands the NPSs' will prevail in the decision-making process. Consideration of the NPSs' is outlined within Section 2.3 of the **Planning Statement [EN010154/APP/7.2]**.
Paragraph 4.1.19	Early engagement both before and at the formal pre-application stage between the applicant and key stakeholders, including public regulators, Statutory Consultees (including Statutory Nature Conservation Bodies (SNCBs)), and those likely to have an interest in a proposed energy infrastructure application, is strongly encouraged in line with the Government's pre-application guidance. This means that only applications which are fully prepared and comprehensive can be accepted for examination, enabling them to be properly assessed by	As required by Regulation 10 of the EIA Regulations 2017, an EIA Scoping Report was submitted to the Planning Inspectorate on 19 June 2023. The Planning Inspectorate issued a Scoping Opinion on 25 July 2023 including formal responses received by the Planning Inspectorate from consultees. Further to this, the Applicant undertook a Non-Statutory Consultation which ran for a period of 39 days from 11 September 2023 to 20 October 2023. Feedback on early proposals for the Proposed Development was sought from a wide range of organisations including the

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	the Examining Authority and leading to a clear recommendation report to the Secretary of State.	Environment Agency, Historic England and Natural England, the host local authorities, North Kesteven District Council and Lincolnshire County Council, as well as landowners and the local community. The feedback provided informed the design of the Proposed Development presented at Statutory Consultation. Further details are provided within the **Consultation Report [EN010154/APP/5.1]** and its supporting **Appendices [EN010154/APP/5.2].**
Paragraph 4.2.4	Government has therefore concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure.	The Proposed Development comprises nationally significant low carbon infrastructure where the CNP presumption applies. Section 4.1 of the **Statement of Need [EN010154/APP/7.1]** details the nature of the Proposed Development as CNP Infrastructure, and Section 7.4 of the **Planning Statement [EN010154/APP/7.2]** demonstrates that the CNP presumption can be applied to the Proposed Development.
Paragraph 4.2.5	This does not extend the definition of what counts as nationally significant infrastructure: the scope remains as set out in the Planning Act 2008. Low carbon infrastructure for the purposes of this policy means: - for electricity generation, all onshore and offshore generation that does not involve fossil fuel combustion (that is, renewable generation, including anaerobic digestion and other plants that convert residual waste into	The Proposed Development comprises low carbon infrastructure for electricity generation that does not involve fossil fuel combustion and therefore comprises infrastructure that is defined as being CNP.

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	energy, including combustion, provided they meet existing definitions of low carbon; and nuclear generation), as well as natural gas fired generation which is carbon capture ready	
Paragraph 4.2.6	The overarching need case for each type of energy infrastructure and the substantial weight which should be given to this need in assessing applications, as set out in paragraphs 3.2.6 to 3.2.8 of EN-1, is the starting point for all assessments of energy infrastructure applications.	It is noted that the need case for the Proposed Development is set out in NPS EN-1. In addition, the **Statement of Need [EN010154/APP/7.1]** describes how the Proposed Development is consistent with the relevant aspects of UK Government policy as it relates to the provision of energy infrastructure and provides evidence that utility-scale ground-mounted solar is a key part of the government's strategy for a secure, affordable and decarbonised energy system. It is noted that the CNP policy does not create an additional need case. Section 7.4 of the **Planning Statement [EN010154/APP/7.2]** considers the application of the CNP presumption in relation to the Proposed Development. This demonstrates that the CNP presumption applies as a result of compliance of the Proposed Development with the energy NPSs', application of the mitigation hierarchy, and compliance with other legal and regulatory requirements.
Paragraph 4.2.7	The CNP policy **does not** create an additional or cumulative need case or weighting to that which is already outlined for each type of energy infrastructure. The policy applies following the normal consideration of the need case, the impacts of the project, and the application of the mitigation hierarchy. As such, it is relevant during Secretary of State decision making and specifically in reference to any residual impacts that have been identified. It should therefore also be given consideration by the Examining Authority when it is making its recommendation to the Secretary of State. [Bold formatted in NPS EN-1]	
Paragraph 4.2.8	During decision making, the CNP policy will influence how non-HRA and non-MCZ residual impacts are considered in the planning balance. The policy will therefore also influence how the Secretary of State	Non-HRA and non-MCZ impacts are appraised in Section 6 of the **Planning Statement [EN010154/APP/7.2]**. Section 7 of the **Planning Statement [EN010154/APP/7.2]** considers the

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	considers whether tests requiring clear outweighing of harm, exceptionality, or very special circumstances have been met by a CNP Infrastructure application. Further detail is provided in paragraphs 4.2.15 to 4.2.17, and Figure 2.	planning balance and concludes that the substantial benefits of the Proposed Development clearly and demonstrably outweigh the harm that would arise with the proposed mitigation measures in place. Adverse effects would be localised, short-term, temporary and/or reversible at the end of the Proposed Development's lifetime. Hence, the Proposed Development is in accordance with national energy policy, national planning policy and the relevant development plan documents when considered as a whole.
Paragraph 4.2.9	During decision making, the CNP policy also explains the Secretary of State's approach to HRA derogations and MCZ assessments. Specifically, the policy explains how the alternative solutions and IROPI tests are considered by the Secretary of State. Further detail is provided in paragraphs 4.2.18 to 4.2.22, and Figure 3.	There are no Marine Conservation Zones (MCZs) relevant to the Proposed Development. A **Habitats Regulations Assessment (HRA) Report [EN010154/APP/7.13]** has been prepared, with the 'no significant effects statement' set out in Section 4 concluding that there will be no significant effects to any European site or sites from any phase of the Proposed Development individually or in combination with other plans and projects.
Paragraph 4.2.10	Applicants for CNP infrastructure must continue to show how their application meets the requirements in this NPS and the relevant technology specific NPS, applying the mitigation hierarchy, as well as any other legal and regulatory requirements.	Section 6 of the **Planning Statement [EN010154/APP/7.2]** demonstrates how the Proposed Development complies with the relevant energy NPSs'. **Chapter 5: EIA Methodology and Consultation** of the ES **[EN010154/APP/6.1]** confirms that the mitigation hierarchy has been applied, and the **Design Approach Document [EN010154/APP/7.3]** demonstrates how

Policy paragraph	Policy description	Compliance commentary
		application of the mitigation hierarchy has led to positive design outcomes. Section 7.4 of the **Planning Statement [EN010154/APP/7.2]** considers the application of the CNP presumption in relation to the Proposed Development. This demonstrates that the CNP presumption applies as a result of compliance of the Proposed Development with the energy NPSs', application of the mitigation hierarchy, and compliance with other legal and regulatory requirements.
Paragraph 4.2.11	Applicants must apply the mitigation hierarchy and demonstrate it has been applied. They should also seek the advice of the appropriate SNCB or other relevant statutory body when undertaking this process. Applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated.	**Chapter 5: EIA Methodology and Consultation** of the ES **[EN010154/APP/6.1]** confirms that the mitigation hierarchy has been applied, and the **Design Approach Document [EN010154/APP/7.3]** demonstrates how application of the mitigation hierarchy has led to positive design outcomes. Section 3.5 of the **Consultation Report [EN010154/APP/5.1]** sets out how the applicant has consulted with the appropriate Statutory Nature Conservation Bodies, including Natural England and the Environment Agency.
Paragraph 4.2.12	Applicants should set out how residual impacts will be compensated for as far as possible. Applicants should also set out how any mitigation or compensation measures will be monitored and reporting agreed to ensure success and that action is taken. Changes to	The **ES [EN010154/APP/6.1/6.2/6.3]** provides details of the embedded and additional mitigation measures, including compensation measures for residual impacts. Mitigation and compensation measures are set out in the following framework plans, detailed versions of

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	measures may be needed e.g. adaptive management. The cumulative impacts of multiple developments with residual impacts should also be considered.	which will be secured under the Requirements set out in Schedule 2 the **Draft Development Consent Order [EN010154/APP/3.1]:** The **Framework LEMP [EN010154/APP/7.15]** contains measures to mitigate the effects of the Proposed Development on the landscape, and biodiversity features; the enhancement of biodiversity, landscape value within the DCO Site boundary; securing compliance with relevant national and local planning policies; and habitat creation and management with the aim of providing significant ecological enhancements while strengthening green infrastructure within the area. Section 7 of the **Framework LEMP [EN010154/APP/7.15]** provides details regarding monitoring. The **Framework CEMP [EN010154/APP/7.7]**, **Framework OEMP [EN010154/APP/7.8]**, and **Framework DEMP [EN010154/APP/7.9]** contain frameworks for environmental management to provide a clear and consistent approach to environmental mitigation during the construction, operation, and decommissioning phases of the Proposed Development respectively. Section 6 of each plan sets out monitoring procedures. The **Framework Battery Safety Management Plan (BSMP) [EN010154/APP/7.17]** contains measures in relation to the management of the BESS. The

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		Framework Soil Management Plan (SMP) [EN010154/APP/7.10] sets out measures in relation to soil management. The **Framework PRoW-MP [EN010154/APP/7.14]** sets out measures in relation to the management of PRoW. The **Framework Construction Traffic Management Plan (CTMP) [EN010154/APP/7.18]** sets out measures in relation to construction traffic. The **Framework ESSCP [EN010154/APP/7.16]** sets out opportunities to maximise benefits in relation to skills, supply chain, and employment. The **ES [EN010154/APP/6.1]** considers cumulative impacts within each chapter, and **Chapter 15: Cumulative Effects and Interactions** addresses the potential for cumulative effects and effect interactions as a result of the Proposed Development. It is acknowledged there are likely residual cumulative adverse effects in terms of heritage and landscape and visual amenity as a result of the Proposed Development. As set out in paragraph 4.2.16 of NPS EN-1 after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. The substantial public benefits of the Proposed Development, described within this Planning Statement, including the delivery of CNP infrastructure outweighs the harm.

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Paragraph 4.2.14	The Secretary of State will continue to consider the impacts and benefits of all CNP Infrastructure applications on a case-by-case basis. The Secretary of State must be satisfied that the applicant's assessment demonstrates that the requirements set out above have been met.	Section 6 of the **Planning Statement [EN010154/APP/7.2]** provides an appraisal of the Proposed Development against national and local planning policy. Section 7 considers the planning balance, concluding that the Proposed Development is in accordance with national energy policy, national planning policy and the relevant development plan documents when considered as a whole. The overall substantial benefits of the Proposed Development clearly and demonstrably outweigh the harm that would arise with the proposed mitigation measures in place. Adverse effects would be localised, short-term, temporary and/or reversible at the end of the Proposed Development's lifetime. Section 7.4 of the **Planning Statement [EN010154/APP/7.2]** considers the application of the CNP presumption in relation to the Proposed Development, demonstrating that the CNP presumption applies due to the Proposed Development's compliance with the energy NPSs', as well as compliance with other legal and regulatory requirements and application of the mitigation hierarchy.
Paragraph 4.2.15	Where residual non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. Therefore, in all but the most exceptional circumstances, it is unlikely that consent will	As stated in Section 7 of the **Planning Statement [EN010154/APP/7.2]**, there are no residual impacts as a result of the Proposed Development which would outweigh the need, nor are there any residual impacts which present an unacceptable risk to, or unacceptable

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	be refused on the basis of these residual impacts. The exception to this presumption of consent are residual impacts onshore and offshore which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero. Further, the same exception applies to this presumption for residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk.	interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero. Given the Proposed Development is not located on the coast, there will be no unacceptable risk to, or unacceptable interference offshore to navigation and coastal erosion risk. The Flood Risk Assessment, **Appendix 9-C: Flood Risk Assessment** of the ES **[EN010154/APP/6.3]** demonstrates that the Proposed Development would remain safe for its lifetime and does not increase flood risk elsewhere.
Paragraph 4.2.16	As a result, the Secretary of State will take as the starting point for decision-making that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances.	Section 6 of the **Planning Statement [EN010154/APP/7.2]** provides an appraisal of the Proposed Development against national and local planning policy whilst Section 7 considers the planning balance. It is acknowledged there are likely residual adverse effects in terms of heritage and landscape and visual amenity as a result of the Proposed Development. However, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure, as described in paragraph 4.2.15 of NPS EN-1. The substantial public benefits of the Proposed Development, described within the **Planning Statement [EN010154/APP/7.2]**, including the delivery of CNP infrastructure, outweigh the harm. The **Planning Statement [EN010154/APP/7.2]** concludes that since,

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		the substantial benefits of the Proposed Development, clearly and demonstrably outweigh the harm, with the proposed mitigation measures in place, when considered as a whole, the Proposed Development is in accordance with national energy policy and national planning policy.
Paragraph 4.2.17	This means that the Secretary of State will take as a starting point that CNP Infrastructure will meet the following, non-exhaustive, list of tests: -where development within a Green Belt requires very special circumstances to justify development; -where development within or outside a Site of Special Scientific Interest (SSSI) requires the benefits (including need) of the development in the location proposed to clearly outweigh both the likely impact on features of the site that make it a SSSI, and any broader impacts on the national network of SSSIs. -where development in nationally designated landscapes requires exceptional circumstances to be demonstrated; and -where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional.	The Proposed Development is not within the Green Belt, an SSSI or within or in close proximity to a nationally designated landscape. The Proposed Development has also been assessed to have less than substantial harm (at the lower end) on heritages assets as set out in **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]**. **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** confirms that the Proposed Development is not situated within a SSSI, and that there are no impacts on SSSI's as a result of the Proposed Development. **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** further notes the Proposed Development is not located within the setting of any nationally designated landscape. **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]** demonstrates the application of the mitigation hierarchy in relation to impacts to heritage assets. Section 7 of the **Planning Statement [EN010154/APP/7.2]** explains how the harm identified

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		with regard to heritage assets is clearly outweighed by the substantial public benefit that would arise from the provision of low carbon energy to meet the need identified within the NPS'.
Paragraph 4.3.1	All proposals for projects that are subject to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) must be accompanied by an Environmental Statement (ES) describing the aspects of the environment likely to be significantly affected by the project.	An **ES [EN010154/APP/6.1/6.2/6.3]**, that has been prepared in accordance with the EIA Regulations, accompanies the DCO application. The ES includes figures and appendices along with a **Non-Technical Summary [EN010154/APP/6.4].** The **ES [EN010154/APP/6.1/6.2/6.3]** sets out the likely significant effects arising from the Proposed Development. The scope and methodology of the EIA is set out in **Chapter 5: EIA Methodology and Consultation** of the ES **[EN010154/APP/6.1]**. The Scoping Opinion, published by the Planning Inspectorate on 25 July 2023 **(Appendix 1-B: EIA Scoping Opinion** of the ES **[EN010154/APP/6.3])** forms the basis of the assessments undertaken.
Paragraph 4.3.3	The Regulations require an assessment of the likely significant effects of the proposed project on the environment, covering the direct effects and any indirect, secondary, cumulative, transboundary, short, medium, and long-term, permanent and temporary, positive and negative effects at all stages of the project, and also of the measures envisaged for avoiding or mitigating significant adverse effects.	An assessment of the likely significant effects of the Proposed Development has been undertaken and the conclusions are presented within the **ES [EN010154/APP/6.1/6.2/6.3]**. **Chapter 1: Introduction** and **Chapter 5: EIA and Methodology and Consultation** of the ES **[EN010154/APP/6.1]** detail the approach and compliance of the ES

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		[EN010154/APP/6.1/6.2/6.3] with relevant legislation, regulations and policy.
Paragraph 4.3.4	To consider the potential effects, including benefits, of a proposal for a project, the applicant must set out information on the likely significant environmental, social and economic effects of the development, and show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy. This information could include matters such as employment, equality, biodiversity net gain, community cohesion, health and well-being.	The **ES [EN010154/APP/6.1/6.2/6.3]** sets out the likely significant effects arising from the Proposed Development. As explained in **Chapter 5: EIA Methodology and Consultation** of the ES **[EN010154/APP/6.1]** the Applicant has applied the mitigation hierarchy and sought to minimise adverse impacts through embedded and proposed additional mitigation measures. Efforts to minimise adverse effects through design are set out in Section 4.5 of the **Design Approach Document [EN010154/APP/7.3]**, whilst details of mitigation measures in relation to specific impacts are summarised in the **Environmental Commitments Register [EN010154/APP/6.5]**. Additional enhancement measures are set out within the **Framework LEMP [EN010154/APP/7.15]** and the development of a detailed plan is secured by Requirement 8 under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1].**
Paragraph 4.3.5	For the purposes of this NPS and the technology specific NPSs the ES should cover the environmental, social and economic effects arising from pre-construction, construction, operation and decommissioning of the project.	The impacts of the Proposed Development have been assessed and considered within the relevant chapters of the ES **[EN010154/APP/6.1/6.2/6.3]**. **Chapter 5: EIA and Methodology and Consultation** of the ES **[EN010154/APP/6.1]** explains the approach taken. The assessment of effects covers each stage of the

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		Proposed Development, considering in turn, the construction phase, the operation (and maintenance) phase and the decommissioning phase. The findings of the assessment are summarised in **Chapter 16: Summary of Environmental Effects** of the ES **[EN010154/APP/6.1]**.
Paragraph 4.3.10	The applicant must provide information proportionate to the scale of the project, ensuring the information is sufficient to meet the requirements of the EIA Regulations	**Chapter 5: EIA and Methodology and Consultation** of the ES **[EN010154/APP/6.1]** presents the approach and methodology applied to the Environmental Impact Assessment, which has been prepared in accordance with the EIA Regulations. The Scoping Opinion, published by the Planning Inspectorate on 25 July 2023 **(Appendix 1-B: EIA Scoping Opinion** of the ES **[EN010154/APP/6.3])** forms the basis of the assessments undertaken.
Paragraph 4.3.19	The Secretary of State should consider how the accumulation of, and interrelationship between, effects might affect the environment, economy, or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place.	The **ES [EN010154/APP/6.1]** considers cumulative impacts within each chapter, and **Chapter 15: Cumulative Effects and Interactions** addresses the potential for cumulative effects and effect interactions as a result of the Proposed Development. It is acknowledged there are likely residual cumulative adverse effects in terms landscape and visual amenity as a result of the Proposed Development. As set out in paragraph 4.2.16 of NPS EN-1 after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of

Policy paragraph	Policy description	Compliance commentary
		infrastructure. The substantial public benefits of the Proposed Development, described within this Planning Statement, including the delivery of CNP infrastructure outweighs the harm. Mitigation measures have been embedded within the design of the Proposed Development to minimise impacts. Where further mitigation is required, this is set out in the **Framework LEMP [EN010154/APP/7.15], Framework CEMP [EN010154/APP/7.7], Framework OEMP [EN010154/APP/7.8]**, and **Framework DEMP [EN010154/APP/7.9].** The development of a detailed LEMP, CEMP, OEMP, and DEMP is secured under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]** at Requirements 8, 12, 13, and 20**.**
Alternatives		
Paragraph 4.3.9	As in any planning case, the relevance or otherwise to the decision making process of the existence (or alleged existence) of alternatives to the proposed development is, in the first instance, a matter of law. This NPS does not contain any general requirement to consider alternatives or to establish whether the proposed project represents the best option from a policy perspective. Although there are specific requirements in relation to compulsory acquisition and habitats sites, the NPS does not change	It is noted there is no policy requirement to consider alternatives to the Proposed Development. However, in accordance with Regulation 14 (2)(d) of the EIA Regulations, **Chapter 4: Alternatives and Design Evolution** of the ES **[EN010154/APP/6.1]** describes alternatives which were considered, as well as the design evolution of the Proposed Development and provides a summary of the site selection process undertaken.

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	requirements in relation to compulsory acquisitions and habitats sites.	In terms of compulsory acquisition, the Applicant is seeking compulsory acquisition powers over land which cannot be secured through voluntary agreement. Further details are contained within the **Statement of Reasons [EN010154/APP/4.1]**. **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** concludes that there will be no potential for significant effects on ecology, and as set out in the **Biodiversity Net Gain Report [EN010154/APP/7.12]**, there will be a net gain in biodiversity as a result of the Proposed Development
Paragraph 4.3.10	The applicant must provide information proportionate to the scale of the project, ensuring the information is sufficient to meet the requirements of the EIA Regulations.	**Chapter 5: EIA and Methodology and Consultation** of the ES **[EN010154/APP/6.1]** presents the approach and methodology applied to the Environmental Impact Assessment, which has been prepared in accordance with the EIA Regulations.
Paragraph 4.3.11	In some instances, it may not be possible at the time of the application for development consent for all aspects of the proposal to have been settled in precise detail. Where this is the case, the applicant should explain in its application which elements of the proposal have yet to be finalised, and the reasons why this is the case	As described in **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]**, the technology for solar PV and BESS continues to evolve rapidly; and as a result, the design parameters of the Proposed Development need to maintain some degree of flexibility to allow the most appropriate technology to be utilised at the time of construction. To account for flexibility and enable the optimal design of the Proposed Development post consent, the Rochdale Envelope approach has been adopted for

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		environmental assessment. The result is that the impacts of the Proposed Development will be equal to or less than those concluded in the assessments of the ES **[EN010154/APP/6.1]**. Accordingly, the **Draft Development Consent Order [EN010154/APP/3.1]** secures the worst-case parameters via the **Works Plans [EN010154/APP/2.2]**, **Streets, Rights of Way and Access Plans [EN010154/APP/2.3]** and the **Proposed Development Parameters [EN010154/APP/7.4]**. This provides certainty that the impacts of the Proposed Development will be no worse than those determined in the Environmental Impact Assessment (EIA).
Paragraph 4.3.15	Applicants are obliged to include in their ES, information about the reasonable alternatives they have studied. This should include an indication of the main reasons for the applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility.	The **ES [EN010154/APP/6.1]** demonstrates reasonable alternatives have been studied and these are reported within **Chapter 4: Alternatives and Design Evolution** of the ES **[EN010154/APP/6.1]**, which describes the consideration of alternatives, the design evolution of the Proposed Development and provides a summary of the site selection process undertaken.
Paragraph 4.3.17	Where there is a policy or legal requirement to consider alternatives, the applicant should describe the alternatives considered in compliance with these requirements.	Section 4.2 of **Chapter 4: Alternatives and Design Evolution** of the ES **[EN010154/APP/6.1]** contains details of how the consideration of alternatives required by legislation and policy has been undertaken for the Proposed Development.

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		In terms of compulsory acquisition, the Applicant is seeking compulsory acquisition powers over land if it cannot be secured through voluntary agreement. Further details are contained within the **Statement of Reasons [EN010154/APP/4.1]**. In terms of habitats, the **HRA Report [EN010154/APP/7.13]** concludes that there will be no significant effects to any European site or sites either from the construction, operation and maintenance and decommissioning of the Proposed Development or in combination with other plans and projects. Therefore, the consideration of alternatives has not been required.
Paragraph 4.3.20	The Government has set 13 legally binding targets for England under the Environment Act 2021, covering the areas of: biodiversity; air quality; water; resource efficiency and waste reduction; tree and woodland cover; and Marine Protected Areas. Meeting the legally binding targets will be a shared endeavour that will require a whole of government approach to delivery. The Secretary of State have regard to the ambitions, goals and targets set out in the Government's Environmental Improvement Plan 2023 for improving the natural environment and heritage. This includes having regard to the achievement of statutory targets set under the Environment Act.	The **ES [EN010154/APP/6.1]** provides a comprehensive assessment in accordance with the EIA regulations as to the impacts of the Proposed Development on the environment. **Chapter 5: EIA Methodology and Consultation** of the ES **[EN010154/APP/6.1]** details the assessment methodology noting in Section 5.9 the consideration of environmental quality standards, environmental policies, and legislation in determining the significance of effects. Where effects are considered unacceptable despite the implementation of the embedded mitigation measures, additional mitigation measures are implemented to minimise any adverse effects. This demonstrates the Applicant's consideration of the wider

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		ambitions, goals, and targets of the UK government with regard to each examined environmental factor.
Paragraph 4.3.22	Given the level and urgency of need for new energy infrastructure, the Secretary of State should, subject to any relevant legal requirements (e.g. under the Habitats Regulations) which indicate otherwise, be guided by the following principles when deciding what weight should be given to alternatives: • the consideration of alternatives in order to comply with policy requirements should be carried out in a proportionate manner; and • only alternatives that can meet the objectives of the proposed development need to be considered.	The consideration of alternatives in order to comply with policy requirements is detailed within Section 4.2 of **Chapter 4: Alternatives and Design Evolution** of the ES **[EN010154/APP/6.1]**. Where necessary in order to comply with policy requirements set out in NPS EN-1, the consideration of alternatives has been undertaken, in relation to compulsory acquisition, air quality. Biodiversity and geological conservation interests, and flood risk. Section 6.2 of the **Planning Statement [EN010154/APP/7.2]** sets out how alternatives in the context of these matters have been considered. In terms of habitats, the **HRA Report [EN010154/APP/7.13]** concludes that there will be no significant effects to any European site or sites either from the construction, operation and maintenance and decommissioning of the Proposed Development or in combination with other plans and projects. Therefore, the consideration of alternatives has not been required.
Paragraph 4.3.23	The Secretary of State should be guided in considering alternative proposals by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security, climate	Section 4.5 of **Chapter 4: Alternatives and Design Evolution** of the ES **[EN010154/APP/6.1]** sets out consideration of alternative solar infrastructure technologies with Sections 4.6 to 4.8 providing further consideration of alternative development proposals.

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	change, and other environmental benefits) in the same timescale as the proposed development	Consideration has been given to the environmental impacts and ability for the Proposed Development to deliver the same capacity/energy security as other developments and the maximum benefit in accordance with the Design Vision set out in Section 3 of the **Design Approach Document [EN010154/APP/7.3]**.
Paragraph 4.3.24	The Secretary of State should not refuse an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site, and should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals	**Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]** demonstrates how the Applicant has sought to identify a suitable site that is as least environmentally constrained as possible, whilst also taking into account operational factors. It is considered that the site identified is suitable for the purposes of the Proposed Development.
Paragraph 4.3.25	Alternatives not among the main alternatives studied by the applicant (as reflected in the ES) should only be considered to the extent that the Secretary of State thinks they are both important and relevant to the decision	The consideration of alternatives has been undertaken and reported in **Chapter 4: Alternatives and Design Evolution** of the ES **[EN010154/APP/6.1] Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]**. Environmental assessment of the selected site is presented within the **ES [EN010154/APP/6.1]** and the overall compliance of the Proposed Development with the NPSs' is set out within the planning appraisal in Section 6 of the **Planning Statement [EN010154/APP/7.2]**, which demonstrates the suitability of the selected site.
Paragraph 4.3.27	Alternative proposals which mean the necessary development could not proceed, for example because the	**Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]** considers alternative

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	alternative proposals are not commercially viable or alternative proposals for sites would not be physically suitable, can be excluded on the grounds that they are not important and relevant to the Secretary of State's decision.	sites against a range of criteria including planning, environmental and operational factors. A number of sites were discounted based on their viability and/or environmental constraints. It is considered that the site selected is suitable for the Proposed Development.
Paragraph 4.3.28	Alternative proposals which are vague or immature can be excluded on the grounds that they are not important and relevant to the Secretary of State's decision.	Noted. **Chapter 4: Alternatives and Design Evolution** of the ES **[EN010154/APP/6.1]** considers alternatives, including that proposed by local stakeholders, which has been discounted.
Paragraph 4.3.29	It is intended that potential alternatives to a proposed development should, wherever possible, be identified before an application is made to the Secretary of State (so as to allow appropriate consultation and the development of a suitable evidence base in relation to any alternatives which are particularly relevant). Therefore, where an alternative is first put forward by a third party after an application has been made, the Secretary of State may place the onus on the person proposing the alternative to provide the evidence for its suitability as such and the Secretary of State should not necessarily expect the applicant to have assessed it.	Feedback provided following the Statutory Consultation proposed that an alternative layout be considered in the area north of the A46. **Chapter 4: Alternatives and Design Evolution** of the ES **[EN010154/APP/6.1]** considers the proposed alternative, which is discounted as it would result in a reduction in generation capacity, the alternative layout did not align with the Design Vision and some of the proposed layout was not within the DCO Site boundary. Further information is set out in Section 4.9 of **Chapter 4: Alternatives and Design Evolution** of the ES **[EN010154/APP/6.1].**
Health		
Paragraph 4.4.1	Energy infrastructure has the potential to impact on the health and well-being ("health") of the population. Access to energy is clearly beneficial to society and to our health	It is acknowledged that energy infrastructure has the potential to impact on the health and well-being of the population. As described in the EIA Scoping Report

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	as a whole. However, the construction of energy infrastructure and the production, distribution and use of energy may have negative impacts on some people's health.	(**Appendix 1-A: EIA Scoping Report** of the ES **[EN010154/APP/6.3]**) and accepted in the Scoping Opinion (**Appendix 1-B: EIA Scoping Opinion** of the ES **[EN010154/APP/6.3]**), potential effects to human health are considered in the ES technical chapters with a standalone assessment scoped out of the EIA.
Paragraph 4.4.2	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	Health impacts are considered within the **ES [EN010154/APP/6.1]** technical chapters where relevant. This includes **Chapter: 10 Landscape and Visual Amenity**, **Chapter 11: Noise and Vibration**, **Chapter 13: Traffic and Transport**, **Chapter 9: Water Environment**, and **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** specifically within Chapter 14, Section 14.2, which considers air quality. Section 6.2 of the **Planning Statement [EN010154/APP/7.2]** considers the effects of the Proposed Development on human health in the context of planning policy.
Paragraph 4.4.3	New energy infrastructure may also affect the composition and size 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.	Health impacts are considered within the **ES [EN010154/APP/6.1]** and suitable mitigation measures have been incorporated where appropriate to minimise significant adverse effects. **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]** presents the findings of an assessment of the likely significant effects of the Proposed Development upon traffic and transport

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		during construction, operation and decommissioning of the Proposed Development including impacts on PRoW.
Paragraph 4.4.4	As described in the relevant sections of this NPS and in the technology specific NPSs, where the proposed project has an effect on humans, the ES should assess these effects for each element of the project, identifying any potential adverse health impacts, and identifying measures to avoid, reduce or compensate for these impacts as appropriate.	Health impacts are considered within the **ES [EN010154/APP/6.1]** technical chapters where relevant, including: **Chapter: 10 Landscape and Visual Amenity**, **Chapter 11: Noise and Vibration**, **Chapter 13: Traffic and Transport**, **Chapter 9: Water Environment**, and Section 14.2 Air Quality within **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]**. As set out in **Chapter 11: Noise and Vibration** of the ES **[EN010154/APP/6.1]** a significant adverse effect has been predicted in relation to vibration during construction. However, with the mitigation measures proposed within the **Framework CEMP [EN010154/APP/7.7]** and the development of a detailed CEMP secured under Requirement 12 under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**, the significant adverse vibration impacts during construction would be unlikely to occur and if they did would be temporary, short-term and minimised as far as reasonably practicable.
Paragraph 4.4.5	The impacts of more than one development may affect people simultaneously, so the applicant should consider	**Chapter 15: Cumulative Effects and Interactions** of the ES **[EN010154/APP/6.1]** addresses the potential for cumulative effects and effect interactions as a result of

Policy paragraph	Policy description	Compliance commentary
	the cumulative impact on health in the ES where appropriate	the Proposed Development. It is acknowledged there are likely residual cumulative adverse effects in terms of landscape and visual amenity as a result of the Proposed Development. As set out in paragraph 4.2.16 of NPS EN-1 after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. The substantial public benefits of the Proposed Development, described within this Planning Statement, including the delivery of CNP infrastructure outweighs the harm.
Paragraph 4.4.6	Opportunities should be taken to mitigate indirect impacts, by promoting local improvements to encourage health and wellbeing, this includes potential impacts on vulnerable groups within society and impacts on those with protected characteristics under the Equality Act 2010, i.e. those groups which may be differentially impacted by a development compared to wider society as a whole.	As set out in the **Design Approach Document [EN010154/APP/7.3]**, the Proposed Development has been designed to deliver positive outcomes in relation to landscape and green infrastructure through measures proposed in the **Framework LEMP [EN010154/APP/7.15]** such as the community orchard. The **Design Approach Document [EN010154/APP/7.3]** also sets out positive outcomes in terms of accessibility as a result of the proposed permissive paths which will be operational for the duration of the operation of the Proposed Development. It is considered that these measures encourage health and well-being.
Paragraph 4.4.7	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	Section 14.2 of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** details the consideration of legislation, policy, and guidance in

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	for air pollution) which will constitute effective mitigation of them, so that it is unlikely that health concerns will either by themselves constitute a reason to refuse consent or require specific mitigation under the Planning Act 2008.	relation to air quality, which is also set out within Section 14.2 of **Appendix 14-A: Other Environmental Topics Policy and Legislation** of the ES **[EN010154/APP/6.3]**. As concluded within Section 14.2 of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** which relates to the impacts on air quality, following the implementation of embedded mitigation measures there are no residual significant adverse effects and therefore no further mitigation measures are required. This demonstrates the effective mitigation of any impacts and therefore there is no reason to refuse consent or require specific mitigation under the Planning Act 2008.
Paragraph 4.4.8	However, not all potential sources of health impacts will be mitigated in this way and the Secretary of State may want to take account of health concerns when setting requirements relating to a range of impacts such as noise.	Health impacts are considered within the **ES [EN010154/APP/6.1]** technical chapters where relevant. This includes the consideration of noise within **Chapter 11: Noise and Vibration** of the ES **[EN010154/APP/6.1]**. There are no significant adverse effects anticipated as a result of the Proposed Development in relation to noise, following the implementation of embedded mitigation measures. It is not considered that further requirements in relation to health impacts are necessary.
Biodiversity Net Gain		

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Paragraph 4.6.1	Environmental net gain is an approach to development that aims to leave the natural environment in a measurably better state than beforehand. Projects should therefore not only avoid, mitigate and compensate harms, following the mitigation hierarchy, but also consider whether there are opportunities for enhancements.	As explained in **Chapter 5: EIA Methodology and Consultation** of the ES **[EN010154/APP/6.1]** the Applicant has applied the mitigation hierarchy and sought to minimise adverse impacts through embedded and additional mitigation measures. Efforts to minimise adverse effects through design are set out in Section 4.5 of the **Design Approach Document [EN010154/APP/7.3]**, whilst details of impact specific mitigation measures are summarised in the **Environmental Commitments Register [EN010154/APP/6.5]**. Additional enhancement measures are set out within the **Framework LEMP [EN010154/APP/7.15],** and the development of a detailed LEMP is secured under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]** under Requirement 8**.** In addition, the Proposed Development will create approximately 9.5km of new permissive paths across the Principal Site to supplement the existing PRoW network, link existing routes as well as enhancing existing and creating new connections to surrounding villages.
Paragraph 4.6.2	Biodiversity net gain is an essential component of environmental net gain. Projects in England should consider and seek to incorporate improvements in natural	The design of the Proposed Development has evolved with consideration to Design Principle 9, set out in the **Design Approach Document [EN010154/APP/7.3]**,

Policy paragraph	Policy description	Compliance commentary
	capital, ecosystem services and the benefits they deliver when planning how to deliver biodiversity net gain.	which seeks to avoid adverse impacts and to enhance existing biodiversity through the creation of new green infrastructure and the creation of new habitat for wildlife to achieve a minimum 10% in BNG. As is typical for ground-mounted solar projects, the Proposed Development delivers biodiversity net gain, given the change from intensively managed agricultural land to a grassland habitat underneath and around solar panels, which is sensitively managed to maximise ecological value. As detailed within the **Biodiversity Net Gain Report [EN010154/APP/7.12]**, the Applicant has committed to deliver a minimum of 30% biodiversity net gain in habitat units, 50% biodiversity net gain in hedgerow units and 10% biodiversity net gain in watercourse units which is secured under Requirement 8 in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. Measures for the enhancement of natural capital, BNG, and ecosystem services are set out within the **Framework LEMP [EN010154/APP/7.15]**, which details the measures and prescriptions for: mitigation against the effects of the Proposed Development on the landscape, and biodiversity features; the enhancement of biodiversity and landscape value within the DCO Site; securing compliance with relevant national and local planning policies; and habitat creation and management with the aim of providing significant ecological
Paragraph 4.6.6	Energy NSIP proposals, whether onshore or offshore, should seek opportunities to contribute to and enhance the natural environment by providing net gains for biodiversity, and the wider environment where possible.	

Policy paragraph	Policy description	Compliance commentary
		enhancements while strengthening green infrastructure within the area. Additionally, some measures are managed through the **Framework CEMP [EN010154/APP/7.7]**, **Framework OEMP [EN010154/APP/7.8]**, and **Framework DEMP [EN010154/APP/7.9]**. Detailed versions of the framework LEMP, CEMP, OEMP and DEMP will be developed and are secured under Requirements 8, 12, 13 and 20 under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. As demonstrated in Section 3 of the **Design Approach Document [EN010154/APP/7.3],** the Proposed Development has taken opportunities to contribute to and enhance the natural environment through the provision of BNG and the wider environment where possible.
Paragraph 4.6.7	In England applicants for onshore elements of any development are encouraged to use the latest version of the biodiversity metric to calculate their biodiversity baseline and present planned biodiversity net gain outcomes. This calculation data should be presented in full as part of their application.	The biodiversity metric is set out in **Appendix H: Statutory Biodiversity Metric Calculation** of the **Biodiversity Net Gain Report [EN010154/APP/7.12]**. As detailed within the **Biodiversity Net Gain Report [EN010154/APP/7.12]**, the Applicant has committed to deliver a minimum of 30% BNG in habitat units, 50% BNG in hedgerow units and 10% BNG in watercourse units which is secured under Requirement 8 in

Policy paragraph	Policy description	Compliance commentary
		Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 4.6.8	Where possible, this data should be shared, alongside a completed biodiversity metric calculation with the Local Authority and Natural England for discussion at the pre-application stage as it can help to highlight biodiversity and wider environmental issues which may later cause delays if not addressed.	The Applicant has engaged with the host authorities, North Kesteven District Council and Lincolnshire County Council along with Natural England throughout the pre-application stage and has discussed matters relating to BNG. The calculation will be publicly available to these organisations should the DCO application be accepted for Examination.
Paragraph 4.6.10	Biodiversity net gain should be applied after compliance with the mitigation hierarchy and does not change or replace existing environmental obligations, although compliance with those obligations will be relevant to the question of the baseline for assessing net gain and if they deliver an additional enhancement beyond meeting the existing obligation, that enhancement will count towards net gain	As detailed within the **Biodiversity Net Gain Report [EN010154/APP/7.12]**, the Applicant has committed to deliver a minimum of 30% BNG in habitat units, 50% BNG in hedgerow units and 10% BNG in watercourse units which is secured under Requirement 8 in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 4.6.13	In addition to delivering biodiversity net gain, developments may also deliver wider environmental gains and benefits to communities relevant to the local area, and to national policy priorities, such as • reductions in GHG emissions, • reduced flood risk,	In addition to the Applicant's commitments to deliver BNG, consideration has been given to how the Proposed Development may deliver wider environmental gains and benefits to local communities, as well as the potential to contribute to relevant national policy priorities. As demonstrated in Section 3 of the **Design Approach Document [EN010154/APP/7.3]** the Proposed Development has taken opportunities to deliver wider environmental gains and benefits where

Policy paragraph	Policy description	Compliance commentary
	• improvements to air or water quality, • climate adaptation, • landscape enhancement, • increased access to natural greenspace or • The enhancement, expansion or provision of trees and woodlands The scope of potential gains will be dependent on the type, scale, and location of specific projects. Applicants should look for a holistic approach to delivering wider environmental gains and benefits through the use of nature-based solutions and Green Infrastructure.	possible. Section 5.3 of the **Planning Statement [EN010154/APP/7.2]** sets out the benefits of the Proposed Development. Measures for the enhancement of natural capital, BNG, and ecosystem services are set out within the **Framework LEMP [EN010154/APP/7.15]**, which details the measures and prescriptions for: mitigation against the effects of the Proposed Development on the landscape and biodiversity features; the enhancement of biodiversity and landscape value within the DCO Site boundary; securing compliance with relevant national and local planning policies; as well as habitat creation and management with the aim of providing significant ecological enhancements while strengthening green infrastructure within the area. Details of wider environmental gains and benefits are set out within the relevant chapters of the ES **[EN010154/APP/6.1]**. **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** sets out that the carbon payback period for construction emissions is approximately 4 years of operation. The Proposed Development results in net GHG impacts being below zero. Additionally, some measures are managed through the **Framework CEMP [EN010154/APP/7.7]**, **Framework**

Policy paragraph	Policy description	Compliance commentary
		OEMP [EN010154/APP/7.8], and **Framework DEMP [EN010154/APP/7.9]**. The development of a detailed LEMP, CEMP, OEMP and DEMP is secured under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]** under Requirements 8, 12, 13 and 20.
Paragraph 4.6.15	Applications for development consent should be accompanied by a statement demonstrating how opportunities for delivering wider environmental net gains have been considered, and where appropriate, incorporated into proposals as part of good design (including any relevant operational aspects) of the project.	Opportunities for delivering wider environmental net gains have been extensively considered within the design process. The design of the Proposed Development has evolved with consideration to Design Principle 9, set out in the **Design Approach Document [EN010154/APP/7.3]**, which seeks to avoid adverse impacts and to enhance existing biodiversity through the creation of new green infrastructure and the creation of new habitat for wildlife, to achieve a minimum 10% in BNG. The provision for good design is reflected through the embedded mitigation measures detailed within the **ES [EN010154/APP/6.1]**. The amount of net gain achieved is set out within the **Biodiversity Net Gain Report [EN010154/APP/7.12]**. Measures for delivering these environmental net gains are set out within the **Framework LEMP [EN010154/APP/7.15]**, **Framework SMP [EN010154/APP/7.10]**, **Framework CEMP [EN010154/APP/7.7]**, **Framework OEMP**

Policy paragraph	Policy description	Compliance commentary
		[EN010154/APP/7.8], and **Framework DEMP [EN010154/APP/7.9]**. The development of a detailed LEMP, SMP, CEMP, OEMP and DEMP is secured under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]** under Requirements 8, 15, 12, 13 and 20
Paragraph 4.6.16	Applicants should make use of available guidance and tools for measuring natural capital assets and ecosystem services, such as the Natural Capital Committee's 'How to Do it: natural capital workbook', the government's guidance on Enabling a Natural Capital Approach (ENCA), and other tools that aim to enable wider benefits for people and nature.	Section 1.4 of the **Biodiversity Net Gain Report [EN010154/APP/7.12]** which has been prepared to quantify the overall effect of the Proposed Development upon biodiversity value sets out the legislation and guidance which has informed the assessment. Section 2 of the **Biodiversity Net Gain Report [EN010154/APP/7.12]** sets out that the biodiversity values are calculated and compared using the Statutory Biodiversity Metric. The biodiversity metric is set out in **Appendix H: Statutory Biodiversity Metric Calculation** of the **Biodiversity Net Gain Report [EN010154/APP/7.12]**.
Paragraph 4.6.17	Where environmental net gain considerations have featured as part of the strategic options appraisal process to select a project, applicants should reference that information to supplement the site-specific details.	**Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]** demonstrates how the Applicant has sought to identify a suitable site that is as least environmentally constrained as possible, whilst also taking into account operational factors. The provision for good design is also reflected through the embedded mitigation measures detailed within the **ES [EN010154/APP/6.1]**.

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		Furthermore, achieving a BNG has been integral to the design evolution of the Proposed Development. The **Design Approach Document [EN010154/APP/7.3]** demonstrates that the design has evolved with consideration to Design Principle 9, which seeks to avoid adverse impacts and to enhance existing biodiversity through the creation of new green infrastructure and the creation of new habitat for wildlife to achieve a minimum 10% in BNG. The provision for good design is also reflected through the embedded mitigation measures detailed within the **ES [EN010154/APP/6.1]**.
Paragraph 4.6.1	Although achieving biodiversity net gain is not currently an obligation on applicants, Schedule 15 of the Environment Act 2021 contains provisions which, when commenced, mean the Secretary of State may not grant an application for Development Consent Order unless satisfied that a biodiversity gain objective is met in relation to the onshore development in England to which the application relates.	It is noted that it is not yet mandatory to provide BNG. However, as is typical for ground-mounted solar projects, the Proposed Development can be expected to deliver BNG, given the change from intensively managed agricultural land to a grassland habitat underneath and around solar panels, which is sensitively managed to maximise ecological value. The Proposed Development will meet a minimum 10% BNG, as detailed within the **Biodiversity Net Gain Report [EN010154/APP/7.12].** In particular, the Applicant has committed to deliver a minimum of 30% BNG in habitat units, 50% BNG in hedgerow units and 10% BNG in watercourse units which is secured under Requirement 8 in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.

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Paragraph 4.6.3	The Secretary of State should give appropriate weight to environmental and biodiversity net gain, although any weight given to gains provided to meet a legal requirement (for example under the Environment Act 2021) is likely to be limited.	It is considered that appropriate positive weight should be given to the BNG being delivered as part of the Proposed Development. Section 7 of the **Planning Statement [EN010154/APP/7.2]** considers the planning balance and concludes that substantial positive weight should be given to the BNG delivered by the Proposed Development.
Design		
Paragraph 4.7.1	The visual appearance of a building, structure, or piece of infrastructure, and how it relates to the landscape it sits within, 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.	The **Design Approach Document [EN010154/APP/7.3]** demonstrates how the design of the Proposed Development has evolved to reflect: the site context and outcomes of the environmental assessment; input from technical engagement with stakeholders; the feedback received at both Statutory and Non-Statutory consultation; and how it aligns with the design vision and design principles. The **Design Approach Document [EN010154/APP/7.3]** demonstrates the Applicant's commitment to high quality and good design in order to deliver sustainable infrastructure that is sensitive to place.
Paragraph 4.7.2	Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is	As set out in the **Design Approach Document [EN010154/APP/7.3]**, the application of the Design Vision and Design Principles has resulted in sustainable infrastructure that is sensitive to place, has minimal impacts on heritage assets (specifically Sections 4.2, 4.3 and 4.4 of the **Design Approach Document**

Policy paragraph	Policy description	Compliance commentary
	acknowledged, however that the nature of energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area	**[EN010154/APP/7.3]**), demonstrates efficient use of natural resources (specifically Section 4.5 of the **Design Approach Document [EN010154/APP/7.3]**), and is matched by an appearance that demonstrates good aesthetic as far as possible.
Paragraph 4.7.3	Good design is also a means by which many policy objectives in the NPSs can be met, for example the impact sections show how good design, in terms of siting and use of appropriate technologies, can help mitigate adverse impacts such as noise. Projects should look to use modern methods of construction and sustainable design practices such as use of sustainable timber and low carbon concrete. Where possible, projects should include the reuse of material.	The design of the Proposed Development has evolved in response to the outcomes of non-statutory and statutory consultation, technical feedback, ongoing surveys, desk-based analysis and environmental assessment. The design evolution of the Proposed Development is set out in the **Design Approach Document [EN010154/APP/7.3]**. As set out in Section 4 of the **Design Approach Document [EN010154/APP/7.3],** design measures have been used to mitigate adverse effects, such as the provision of additional planting, screening measures, and buffers to reduce visual impacts. Section 14.5 the Materials and Waste section of **Chapter 14 Other Environmental Topics** of the ES **[EN010154/APP/6.1]** confirms that opportunities have been taken to prevent or reduce impacts in terms of materials and waste resulting from the Proposed Development. Measures for the appropriate management of waste and materials are set out within the **Framework CEMP [EN010154/APP/7.7]**, **Framework OEMP [EN010154/APP/7.8]**, and **Framework DEMP [EN010154/APP/7.9]**. Detailed

Policy paragraph	Policy description	Compliance commentary
		versions of these framework plans will be provided and are secured via Requirements 12, 13 and 20 under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 4.7.4	Given the benefits of good design in mitigating the adverse impacts of a project, applicants should consider how good design can be applied to a project during the early stages of the project lifecycle.	The Applicant has sought to achieve positive design outcomes from an early stage. Achieving good design was considered in the site selection process as set out in the **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]** which sets out the process to identify a site that was as least environmentally constrained as possible, whilst also meeting operational requirements. Following this, the Design Vision and Design Principles were established which provided a clear framework for design evolution as demonstrated in the **Design Approach Document [EN010154/APP/7.3].**
Paragraph 4.7.5	To ensure good design is embedded within the project development, a project board level design champion could be appointed, and a representative design panel used to maximise the value provided by the infrastructure. Design principles should be established from the outset of the project to guide the development from conception to operation. Applicants should consider how their design principles can be applied post-consent.	Section 3.4 of the **Design Approach Document [EN010154/APP/7.3]** sets out the multi-disciplinary team responsible for developing the design of the Proposed Development. The team is very experienced in the development of large scale large-scale solar projects, with a good understanding of the role that good design has in mitigating adverse effects and delivering positive outcomes. The Design Vision and Design Principles were established at an early stage which provided a clear

Policy paragraph	Policy description	Compliance commentary
		framework for design evolution as demonstrated in the **Design Approach Document [EN010154/APP/7.3].** The application of the design principles post-consent has been considered and detailed within **Appendix A: Design Commitments** of the **Design Approach Document [EN010154/APP/7.3]** through a series of design commitments.
Paragraph 4.7.6	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, land form and vegetation. Furthermore, the design and sensitive use of materials in any associated development such as electricity substations will assist in ensuring that such development contributes to the quality of the area. Applicants should also, so far as is possible, seek to embed opportunities for nature inclusive design within the design process.	As set out in the **Design Approach Document [EN010154/APP/7.3]**, the Proposed Development has sought opportunities to implement good design through sensitive consideration of the existing landscape, area, and nature inclusive design which facilitates the integration of the Proposed Development into its landscape setting. These measures are set out within the **Framework LEMP [EN010154/APP/7.15]** and include: a. aiming to avoid or minimise adverse effects on the landscape, biodiversity, heritage and visual effects as much as possible; b. the diversification of the ecological value of existing habitats through initiatives such as hedgerow restoration, riparian corridor management and the creation of an array of diverse habitats; and

Policy paragraph	Policy description	Compliance commentary
		c. the design and management of landscape and biodiversity elements that respond to and enhance the character of the landscape, reinforce local distinctiveness, and strengthen the sense of place. A detailed version of the **Framework LEMP [EN010154/APP/7.15]** is secured under Requirement 8 in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 4.7.7	Applicants must 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.	**The Design Approach Document [EN010154/APP/7.3]** demonstrates how the design of the Proposed Development has evolved as a result of an understanding of the site context, the outcomes of environmental assessment, technical engagement with stakeholders and the feedback received at Non-Statutory and Statutory Consultation, and how it aligns with the Design Vision and Design Principles. **Chapter 4: Alternatives and Design Evolution** of the ES **[EN010154/APP/6.1]** provides an overview of the design development and reasoning for the selected design.
Paragraph 4.7.8	Applicants should consider taking independent professional advice on the design aspects of a proposal. In particular, the Design Council can be asked to provide design review for nationally significant infrastructure projects and applicants are encouraged to use this	Independent advice has not been sought on the design of the Proposed Development. An experienced multi-disciplinary team has developed the design of the Proposed Development as set out within Section 3.4 of the **Design Approach Document [EN010154/APP/7.3]**. The team is very experienced in

Policy paragraph	Policy description	Compliance commentary
	service. Applicants should also consider any design guidance developed by the local planning authority.	the development of large-scale solar projects, with a good understanding of the role that good design has in mitigating adverse effects and delivering positive outcomes. National and local policy and guidance has been reviewed, and this informed the design development of the Proposed Development. Section 2 of the **Design Approach Document [EN010154/APP/7.3]** sets out the relevant national and local policy in relation to the design. It should be noted that the Applicant has taken account of the advice published in October 2024 by the Planning Inspectorate, titled "Nationally Significant Infrastructure Projects: Advice on Good Design" and the structure of the **Design Approach Document [EN010154/APP/7.3]** is based on this guidance.
Paragraph 4.7.10	In the light of the above and given the importance which the Planning Act 2008 places on good design and sustainability, the Secretary of State 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.	As demonstrated in the **Design Approach Document [EN010154/APP/7.3]** a Design Vision and Design Principles have provided the framework for design evolution, resulting in a Proposed Development comprised of sustainable infrastructure which is sensitive to place, minimises impacts on heritage assets and efficiently uses natural resources, matched by an appearance that demonstrates good aesthetic as far as possible. The **Design Approach Document [EN010154/APP/7.3]** sets out how the application of a clear design framework has resulted in sustainable infrastructure that is sensitive to place. The design of

Policy paragraph	Policy description	Compliance commentary
		the Proposed Development has also been informed by the Flood Risk Assessment, in **Appendix 9-C: Flood Risk Assessment** of the ES **[EN010154/APP/6.3]** which demonstrates that the Proposed Development would remain safe for its lifetime and does not increase flood risk elsewhere.
Paragraph 4.7.11	In doing so, the Secretary of State should be satisfied that the applicant has considered 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, any potential amenity benefits, and visual impacts on the landscape or seascape) as far as possible.	Functionality, aesthetic, and visual impacts have been considered from the early design stages of the Proposed Development as set out in the **Design Approach Document [EN010154/APP/7.3]** which sets out details how the application of a clear design framework has resulted in sustainable infrastructure that is sensitive to place. Additionally, **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]** details how the impacts of the Proposed Development to the area were considered during the selection of the site. **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** presents an assessment with mitigation that seeks to minimise visual impacts as far as possible. Embedded mitigation measures include, but are not limited to, the careful siting of solar PV panels and associated infrastructure; the introduction of grassland beneath the solar PV panels; and low-level lighting on specific operational units. The measures to be implemented are set out within the **Framework LEMP [EN010154/APP/7.15]**, **Framework CEMP**

Policy paragraph	Policy description	Compliance commentary
		[EN010154/APP/7.7] and **Framework DEMP [EN010154/APP/7.9]**. Detailed versions of these framework plans are secured under Requirements 8, 12, and 20 under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 4.7.12	In considering applications, the Secretary of State 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. Many of the wider impacts of a development, such as landscape and environmental impacts, will be important factors in the design process.	Operational factors have been taken into account from an early stage. At site selection, alongside the consideration of planning and environmental constraints, operational factors were considered, as detailed in the **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2].** The **Design Approach Document [EN010154/APP/7.3]** demonstrates how landscape and other environmental impacts have been considered and taken into account in the design process. In terms of safety, as the Proposed Development includes BESS a **Framework BSMP [EN010154/APP/7.17]** has been prepared which sets out the key fire safety provisions to ensure the safe management and operation of the BESS. The development of a detailed BSMP is secured under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]** at Requirement 7. Section 3.2 of **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]** provides details of security measures, which include fencing, inward facing

Policy paragraph	Policy description	Compliance commentary
		CCTV and operational lighting, to ensure that the site is secure. Fencing provisions are secured at Requirement 9 under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 4.7.13	The Secretary of State should consider such impacts under the relevant policies in this NPS. Assessment of impacts must be for the stated design life of the scheme rather than a shorter time period.	Section 6 of the **Planning Statement [EN010154/APP/7.2]** sets out the compliance of the Proposed Development with the relevant NPSs'. This draws upon the assessment of the impacts of the Proposed Development as presented in the **ES [EN010154/APP/6.1]** which covers the design life of the Proposed Development.
Climate Change Adaptation and Resilience		
Paragraph 4.10.5	In certain circumstances, measures implemented to ensure a scheme can adapt to climate change may give rise to additional impacts, for example as a result of protecting against flood risk, there may be consequential impacts on coastal change. In preparing measures to support climate change adaptation applicants should take reasonable steps to maximise the use of nature-based solutions alongside other conventional techniques.	The Applicant has sought to incorporate integrated approaches where possible. **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** presents a CCR assessment and an ICCI assessment. The ICCI has been considered by all other technical disciplines within the ES and did not identify any significant ICCI's as part of their assessment. The in-combination assessment concludes no residual significant effects. The **Framework LEMP [EN010154/APP/7.15]**. includes nature-based measures and, where possible, integrated approaches to take account of and build in resilience to climate change, including proposed
Paragraph 4.10.6	Integrated approaches, such as looking across the water cycle, considering coordinated management of water storage, supply, demand, wastewater, and flood risk can provide further benefits to address multiple infrastructure needs, as well as carbon sequestration benefits.	

Policy paragraph	Policy description	Compliance commentary
		woodland and tree belts, new species rich hedgerows with trees, and the provision of a community orchard. In addition, **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** sets out a range of water related mitigation measures to address the impact of the Proposed Development on climate change. This includes measures to mitigate flood risk, such as restricting development in Flood Zone 3 and measures to manage flood risk during construction as set out in the **Framework CEMP [EN010154/APP/7.7]**. **Appendix 9-D**: **Surface Water Drainage Strategy** of the ES **[EN010154/APP/6.3]** sets out measures to attenuate surface run off during construction and operation to minimise flood risk within both the DCO Site and the surrounding areas.
Paragraph 4.10.7	In addition to avoiding further GHG emissions when compared with more traditional adaptation approaches, nature-based solutions can also result in biodiversity benefits and net gain, as well as increasing absorption of carbon dioxide from the atmosphere	Nature based mitigation is set out in the **Framework LEMP [EN010154/APP/7.15]**. The measures have benefits in relation to BNG. As set out in the **Biodiversity Net Gain Report [EN010154/APP/7.12]** the Applicant has committed to deliver a minimum of 30% BNG in habitat units, 50% BNG in hedgerow units and 10% BNG in watercourse units. Therefore, the Proposed Development will meet a minimum 10% BNG, as set out in the **Biodiversity Net Gain Report [EN010154/APP/7.12]**.

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Paragraph 4.10.8	New energy infrastructure will typically need to remain operational over many decades, in the face of a changing climate. Consequently, applicants must consider the direct (e.g. site flooding, limited water availability, storms, heatwave and wildfire threats to infrastructure and operations) and indirect (e.g. access roads or other critical dependencies impacted by flooding, storms, heatwaves or wildfires) impacts of climate change when planning the location, design, build, operation and, where appropriate, decommissioning of new energy infrastructure	**Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** presents an assessment of the likely significant effects on climate change resulting from the proposed construction, operation, and decommissioning of the Proposed Development. The chapter details the findings from the CCR assessment, which assessed the resilience of the Proposed Development to the impacts of future climate change, and the ICCI assessment, which assessed the resilience of receptors in the surrounding environment to the combined impact of future climate conditions and the Proposed Development. There were no significant effects identified in the ICCI assessments, which were also considered within the other technical disciplines of the **ES [EN010154/APP/6.1]**. The CCR identified three significant adverse effects in relation to temperature and additional mitigation measures are proposed as a result. The **Flood Risk Assessment, Appendix 9-C** of the ES **[EN010154/APP/6.3]** takes account of climate change allowances and includes an assessment which considers the H++ scenario, which is a sensitivity test to ensure that infrastructure can operate in extreme events. The **Flood Risk Assessment, Appendix 9-C** of the ES **[EN010154/APP/6.3]** concludes that the flood risk to permanent above ground infrastructure and the risk to people associated with sea level rise is considered a low residual risk, with no further mitigation

Policy paragraph	Policy description	Compliance commentary
		required, in both the Humber and Anglian River Basin Districts. Flood risk was taken into account at an early stage as demonstrated in **Appendix A: Site Selection Report** to the **Planning Statement [EN010154/APP/7.2]** which sets out how the Applicant applied the sequential test by seeking to identify a suitable site in an area at the lowest risk of flooding. Measures in relation to climate change impacts to the Proposed Development are also set out within Section 3 of the **Framework CEMP [EN010154/APP/7.7]**, **Framework OEMP [EN010154/APP/7.8]**, and **Framework DEMP [EN010154/APP/7.9]**. Measures include, but are not limited to, minimising the creation of waste, implementing a Travel Plan, and conducting regular planned maintenance of plant and machinery.
Paragraph 4.10.9	The ES should set out how the proposal will take account of the projected impacts of climate change, using government guidance and industry standard benchmarks such as the Climate Change Allowances for Flood Risk Assessments, Climate Impacts Tool, and British Standards for climate change adaptation, in accordance with the EIA Regulations.	**Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** presents an assessment of the likely significant effects on climate change resulting from the construction, operation, and decommissioning of the Proposed Development. Section 6.2 of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** sets out the legislation, national and local planning policy and relevant guidance relating to climate change which has informed the assessment. The methodology set out in sections 6.4 and 6.5 of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** sets out the

Policy paragraph	Policy description	Compliance commentary
		sources of information which have been used, including projection tools. The outcome of this assessment has informed mitigation measures proposed in the **Framework CEMP [EN010154/APP/7.7]**, **Framework OEMP [EN010154/APP/7.8]**, and **Framework DEMP [EN010154/APP/7.9]**. **Flood Risk Assessment Appendix 9-C** of the ES **[EN010154/APP/6.3]** takes account of climate change allowances and includes an assessment which considers the H++ scenario, a sensitivity test to ensure that infrastructure can operate in extreme events. The **Flood Risk Assessment Appendix 9-C** of the ES **[EN010154/APP/6.3]** concludes that the flood risk to permanent above ground infrastructure and the risk to people associated with sea level rise is considered a low residual risk, with no further mitigation required, in both the Humber and Anglian River Basin Districts.
Paragraph 4.10.11	Applicants should demonstrate that proposals have a high level of climate resilience built-in from the outset and should also 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.	**Appendix 6-B: Climate Change Risk Assessment** of the ES **[EN010154/APP/6.3]** sets out the climate change resilience measures that are embedded within the Proposed Development. The Climate Change Risk Assessment at **Appendix 6-B: Climate Change Risk Assessment** of the ES **[EN010154/APP/6.3]** includes consideration of all infrastructure and assets associated with the Proposed Development, covering resilience against both gradual climate change, and the risks associated with an increased frequency of extreme

Policy paragraph	Policy description	Compliance commentary
		weather events as per the UK Climate Projections 2018 (UKCP18) projections. This includes consideration of variables such as extreme rainfall events, increase in temperatures, and the risk of wildfires (amongst other variables) across construction, operation, and decommissioning, and sets out planned controls and adaption measures for each.
Paragraph 4.10.13	The Secretary of State 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 and associated research and expert guidance (such as the EA's Climate Change Allowances for Flood Risk Assessments or the Welsh Government's Climate change allowances and flood consequence assessments) 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, including any decommissioning period.	**Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** confirms that UK Climate Projections data was obtained to determine the future baseline conditions and allow for the identification of appropriate mitigation measures. Section 6.2 of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** sets out the legislation, national and local planning policy and guidance that has informed the assessment. The assessment in **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** covers the lifetime of the Proposed Development, covering construction, operation and decommissioning.
Network Connection		
Paragraph 4.11.4	Transmission network infrastructure, and related network reinforcement and upgrade works, associated with nationally significant low carbon infrastructure is	The Proposed Development is defined as CNP Infrastructure as it relates to electricity generation that does not involve fossil fuel combustion.

Policy paragraph	Policy description	Compliance commentary
	considered as CNP Infrastructure. Further guidance can be found in Section 4.2 of this NPS and EN-5.	
Paragraph 4.11.8	On some occasions it may not be possible to coordinate applications. For example, different elements of a project may have different lead-in times and be undertaken by different legal entities subject to different commercial and regulatory frameworks (for example grid companies operate within OFGEM controls) making it inefficient from a delivery perspective to submit one application. Applicants may therefore decide to submit separate applications for each element. Where this is the case, the applicant should include information on the other elements and explain the reasons for the separate application confirming that there are no obvious reasons for why other elements are likely to be refused.	The DCO application includes all elements required to deliver the Proposed Development. The point of connection for the Proposed Development is the proposed National Grid substation near Navenby. Whilst the proposed National Grid substation near Navenby does not form part of this DCO application and is subject to a separate decision-making process under the Town and County Planning Act 1990, there is no indication that this development will not come forward, with the website for the project stating planning submission will be in "Late 2025"[3] (at the time of writing).
Paragraph 4.11.9	If this option is pursued, the applicant accepts the implicit risks involved in doing so and must ensure they provide sufficient information to comply with the EIA Regulations including the indirect, secondary, and cumulative effects, which will encompass information on grid connections	
Paragraph 4.11.12	The Secretary of State should be satisfied that appropriate network connection arrangements are/will	A Grid Connection Agreement with National Grid Electricity System Operator Limited (NGESO) to connect the Proposed National Grid Substation near

[3] https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/infrastructure-projects/navenby-substation [accessed June 2025]

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	be in place for a given project regardless of whether one or multiple (linked) applications are submitted.	Navenby has been secured for the Proposed Development. Details of the agreement, including the responsibilities of the relevant parties, are set out in Sections 2 and 4 of the **Grid Connection Statement [EN010154/APP/7.5]**.
Pollution Control and Other Environmental Regulatory Regimes		
Paragraph 4.12.6	Many projects covered by this NPS will be subject to the Environmental Permitting Regulations, which also incorporates operational waste management requirements for certain activities. When an applicant applies for an Environmental Permit, the relevant regulator (usually the EA or NRW but sometimes the local authority) requires that the application demonstrates that processes are in place to meet all relevant Environmental Permitting Regulations requirements.	The principal consent for the Proposed Development will be a DCO which will have the effect of providing consent for the authorised development described in Schedule 1 of the **Draft Development Consent Order [EN010154/APP/3.1]**. In addition to the **Draft Development Consent Order [EN010154/APP/3.1]** there are a range of other consents, licences and permits that may be required to construct and operate the Proposed Development. These other consents, licences and permits are set out in the **Consents and Agreements Position Statement [EN010154/APP/3.3].**
Paragraph 4.12.7	Applicants should make early contact with relevant regulators, including EA or NRW and the MMO, to discuss their requirements for Environmental Permits and other consents, such as marine licences.	The Applicant engaged with the Environment Agency during Non-Statutory and Statutory Consultation and through ongoing technical engagement. The **Consultation Report [EN010154/APP/5.1]** provides details of this engagement. The **Potential Main Issues for Examination [EN010154/APP/7.11]** demonstrates that the

Policy paragraph	Policy description	Compliance commentary
		engagement has been productive, and the Applicant has been pro-active in resolving issues throughout the pre-application stage.
Paragraph 4.12.8	Wherever possible, applicants should submit applications for Environmental Permits and other necessary consents at the same time as applying to the Secretary of State for development consent	The **Consents and Agreements Position Statement [EN010154/APP/3.3]** provides information on the additional consents and licences that are, or may be, required to construct and operate the Proposed Development.
Paragraph 4.12.9	In considering an application for development consent the Secretary of State should focus on whether the development itself is an acceptable use of the land or sea, and the impact of that use, rather than the control of processes, emissions or discharges themselves.	The application for development consent for the Proposed Development demonstrates that the development is an acceptable use of the land. **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]** sets out how a suitable site was identified taking into account a range of planning, environmental and operational factors. The impacts of the Proposed Development are set out in the **ES [EN010154/APP/6.1]** which provides an assessment of the likely significant effects of the Proposed Development on the environment, and inputs into the development of the design of the Proposed Development, including embedded mitigation measures, and the identification of any additional mitigation or monitoring required. The outcomes of the assessment informed the design evolution of the Proposed Development, as set out in the **Design Approach Document [EN010154/APP/7.3]**.

Policy paragraph	Policy description	Compliance commentary
		The **Statement of Need [EN010154/APP/7.1]** details the need for the Proposed Development, as CNP infrastructure, demonstrating the meaningful and timely contributions offered by the Proposed Development 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 beyond delivery of the government's 'Clean Power by 2030' mission. This demonstrates the development itself to be of significant benefit.
Paragraph 4.12.10	The Secretary of State should work on the assumption that the relevant pollution control regime and other environmental regulatory regimes, including those on land drainage, water abstraction and biodiversity, will be properly applied and enforced by the relevant regulator. The Secretary of State should act to complement but not seek to duplicate them.	The Applicant has engaged with the Environment Agency, water and sewage undertakers and the relevant internal drainage boards during Non-Statutory and Statutory Consultation and through ongoing technical engagement. The **Consultation Report [EN010154/APP/5.1]** provides details of this engagement.
Paragraph 4.12.15	Working in close cooperation with the EA or NRW and/or the pollution control authority, and other relevant bodies, such as the MMO, the SNCB, Drainage Boards, and water and sewerage undertakers, the Secretary of State 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	The **Potential Main Issues for Examination [EN010154/APP/7.11]** demonstrates that the engagement has been productive, and the Applicant has been pro-active in resolving issues raised throughout the pre-application stage. Potential impacts arising from the Proposed Development have been assessed as part of the EIA process, with the results presented in the **ES [EN010154/APP/6.1/6.2/6.3].** The assessments and conclusions have been informed by the relevant

Policy paragraph	Policy description	Compliance commentary
	• 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	policies, legislation, and guidance for the topics assessed. Embedded and additional mitigation measures and enhancements have been implemented to minimise the adverse effects of the Proposed Development. The impacts of the Proposed Development in relation to materials and waste will be appropriately controlled through management plans including applying the waste hierarchy and commitment to recycling as set out in the **Framework CEMP [EN010154/APP/7.7] Framework OEMP [EN010154/APP/7.8]** and the **Framework DEMP [EN010154/APP/7.9]** detailed versions of which are secured via Requirements 12, 13 and 20 under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. The **Consents and Agreements Position Statement [EN010154/APP/3.3]** provides information on the additional consents and licences that are, or may be, required to construct and operate the Proposed Development.
Safety		
Paragraph 4.13.5	Applicants should consult with the HSE on matters relating to safety.	The Applicant consulted with the HSE as part of the Statutory Consultation which commenced on 21 October 2024 and ran until 2 December 2024. The HSE submitted feedback to the consultation on 12 November 2024 stating that the assessment of significant effects

Policy paragraph	Policy description	Compliance commentary
		should include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. The **Consultation Report [EN010154/APP/5.1]** sets out the Applicant's response to the HSE. The risk of Major Accidents and Disasters has been assessed in Section 14.6 (Major Accidents and Disasters) of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** in accordance with The EIA Regulations 2017.
Paragraph 4.13.6	Applicants seeking to develop infrastructure subject to the COMAH regulations should make early contact with the Competent Authority.	The Proposed Development is not subject to the COMAH regulations, and a safety report is not required.
Paragraph 4.13.7	If a safety report is required it is important to discuss with the Competent Authority the type of information that should be provided at the design and development stage, and what form this should take. This will enable the Competent Authority to review as much information as possible before construction begins, in order to assess whether the inherent features of the design are sufficient to prevent, control and mitigate major accidents	
Paragraph 4.13.8	The Secretary of State should be satisfied that a safety assessment has been prepared, where required, and that the Competent Authority has raised no safety objectives.	

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Hazardous Substances		
Paragraph 4.14.5	Applicants must consult the (HSA) and HSE at pre-application stage if the project is likely to need hazardous substances consent. Hazardous substances consents are a part of the planning regime which contributes to public safety.	The Applicant consulted with the HSE as part of the Statutory Consultation which commenced on 21 October 2024 and ran until 2 December 2024. The HSE submitted feedback to the consultation on 12 November 2024 stating that the assessment of significant effects should include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. The **Consultation Report [EN010154/APP/5.1]** sets out the Applicant's response to the HSE. The risk of Major Accidents and Disasters has been assessed in Section 14.6 (Major Accidents and Disasters) of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** in accordance with The EIA Regulations 2017.There is no requirement for hazardous substances to be utilised in relation to the Proposed Development, and therefore, Hazardous Substance Consent is not required.
Common Law Nuisance and Statutory Nuisance		
Paragraph 4.15.5	At the application stage of an energy NSIP, possible sources of nuisance under section 79(1) of the EPA 1990 and how they may be mitigated or limited should be identified by the applicant so that appropriate requirements can be included in any subsequent order	A **Statutory Nuisance Statement [EN010154/APP/7.6]** has been included with the application which assesses any possible sources of nuisance under section 79(1) of the Environmental Protection Act 1990. This concludes that neither the

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	granting development consent (see Section 5.7 on dust, odour, artificial light etc. and Section 5.12 on noise and vibration).	construction, operation (and maintenance), nor decommissioning of the Proposed Development are expected to cause a statutory nuisance.
Security Considerations		
Paragraph 4.16.4	Government policy is to ensure that, where possible, proportionate protective security measures are designed into new infrastructure projects at an early stage in the project development. Where applications for development consent for infrastructure covered by this NPS relate to potentially 'critical' infrastructure, there may be national security considerations.	The Applicant has not identified any relevant considerations relating to national security in relation to the Proposed Development. Security measures including fencing, CCTV and lighting are described in **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]**. In particular, fencing provisions are secured via Requirement 9 under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Air Quality and emissions		
Paragraph 5.2.3	For many air pollutants there is not a threshold below which there is no health impact so it is important that energy infrastructure schemes consider not just how a scheme may impact statutory air quality limits, objectives or targets but also measures to mitigate all emissions in order to minimise human exposure to air pollution, especially for those who are more susceptible to the impacts of poor air quality.	There are no significant adverse effects identified in relation to air quality, as confirmed within **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1].** Nonetheless, embedded mitigation measures in accordance with good site practice, and dust management measures in accordance with the Institute of Air Quality Management (IAQM) guidance will be provided through a **Framework CEMP [EN010154/APP/7.7]**, **Framework OEMP [EN010154/APP/7.8],** and **Framework DEMP [EN010154/APP/7.9]** for which the development of

Policy paragraph	Policy description	Compliance commentary
		detailed versions is secured via Requirements 12, 13, and 20 under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 5.2.4	In addition, a particular effect of air emissions from some energy infrastructure may be eutrophication, which is the excessive enrichment of nutrients in the environment. Eutrophication from air pollution results mainly from emissions of NOx and ammonia. The main emissions from energy infrastructure are from generating stations. Eutrophication can affect plant growth and functioning, altering the competitive balance of species and thereby damaging biodiversity. In aquatic ecosystems it can cause changes to algal composition and lead to algal blooms, which remove oxygen from the water, adversely affecting plants and fish. The effects on ecosystems can be short term or irreversible and can have a large impact on ecosystem services such as pollination, aesthetic services and water supply.	The **Framework CEMP [EN010154/APP/7.7]** outlines the standard embedded good practice measures that will be implemented during construction of the Proposed Development, such as dust suppression and pollution prevention. The **Framework CEMP [EN010154/APP/7.7]** also details the measures required to mitigate any construction related effects on habitats (and any species using them), including those associated with dust deposition, changes in air pollution, air quality and lighting. The implementation of these measures is secured via Requirement 12, under Schedule 2 of the **Draft Development Consent [EN010154/APP/3.1]** which requires the preparation of a detailed CEMP, which is to be substantially in accordance with the **Framework CEMP [EN010154/APP/7.7]**.
Paragraph 5.2.7	Proximity to emission sources can have significant impacts on sensitive receptor sites for air quality, such as education or healthcare sites, residential use or sensitive or protected ecosystems. Projects near a sensitive receptor site for air quality should only be proposed in exceptional circumstances if no viable alternative site is available. In these instances, substantial mitigation of any	The Applicant has demonstrated consideration of sensitive receptors in Section 3.2 of the **Design Approach Document [EN010154/APP/7.3],** noting the exclusion of areas close to sensitive human receptors in stage 2 of the site selection process. As confirmed within the air quality section of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]**,

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	expected emissions will be required (see paragraph 5.2.12 below)	the Proposed Development is not located near to a sensitive receptor site for air quality. Nonetheless, good practice measures have been adopted and implemented through embedded mitigation measures, such as appropriate communication, preparation, maintenance, and monitoring of the site, as set out within **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]**. These measures are provided through the **Framework CEMP [EN010154/APP/7.7], Framework OEMP [EN010154/APP/7.8]**, and **Framework DEMP [EN010154/APP/7.9].** A detailed version of each of these plans is secured via Requirements 12, 13 and 20 under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1].**
Paragraph 5.2.8	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 ES.	There are no significant adverse effects identified in relation to air quality, as confirmed within **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1].** Nonetheless, embedded mitigation measures in accordance with good site practice, and dust management measures in accordance with the Institute of Air Quality Management (IAQM) guidance are provided through the **Framework CEMP [EN010154/APP/7.7]**, **Framework OEMP [EN010154/APP/7.8],** and **Framework DEMP [EN010154/APP/7.9]** of which detailed versions are

Policy paragraph	Policy description	Compliance commentary
		secured via Requirements 12, 13, and 20 under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 5.2.9	The ES should describe: • existing air quality concentrations and the relative change in air quality from existing levels; • any significant air quality effects, their mitigation action taken 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 emissions, concentration change and absolute concentrations as a result of the proposed project, after mitigation methods have been applied; • and any potential eutrophication impacts.	**Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** contains an assessment of air quality in accordance with the requirements of the policy set out in paragraph 5.2.9. The chapter concludes that there are no significant adverse effects anticipated as a result of the Proposed Development, however embedded mitigation measures are implemented in accordance with good site practice as a precautionary approach. These will be provided through the Framework **CEMP [EN010154/APP/7.7]**, **Framework OEMP [EN010154/APP/7.8],** and **Framework DEMP [EN010154/APP/7.9]** of which detailed plans will be secured via Requirements 12, 13, and 20 under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 5.2.10	In addition, applicants should consider the Environment Targets (Fine Particulate Matter) (England) Regulations 2022 and associated Defra guidance.	The assessment of air quality impacts set out in Section 14.2 of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** considers the Environment Targets (Fine Particulate Matter) and associated guidance alongside DEFRA's future national projections of air quality.
Paragraph 5.2.11	Defra publishes future national projections of air quality based on estimates of future levels of emissions, traffic, and vehicle fleet. Projections are updated as the evidence base changes and the applicant should ensure	

Policy paragraph	Policy description	Compliance commentary
	these are current at the point of an application. The applicant's assessment should be consistent with this but may include more detailed modelling and evaluation to demonstrate local and national impacts. If an applicant believes they have robust additional supporting evidence, to the extent they could affect the conclusions of the assessment, they should include this in their representations to the Examining Authority along with the source	
Paragraph 5.2.12	Where a proposed development is likely to lead to a breach of any relevant statutory air quality limits, objectives or targets, or affect the ability of a non-compliant area to achieve compliance within the timescales set out in the most recent relevant air quality plan /strategy at the time of the decision, the applicant should work with the relevant authorities to secure appropriate mitigation measures to ensure that those statutory limits, objectives or targets are not breached.	No breach of air quality limits is predicted, as set out in the air quality section (14.2) of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]**.
Paragraph 5.2.13	The Secretary of State 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. In doing so the Secretary of State should have	Defra's $PM_{2.5}$ Targets: Interim Planning Guidance[4] confirms that "pending publication of the new guidance, applicants are advised to provide evidence in their planning applications that they have identified key sources of air pollution within their schemes and taken

[4] https://uk-air.defra.gov.uk/pm25targets/planning

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	regard to the Air Quality Strategy in England, or the Clean Air Plan for Wales in Wales, or any successors to these and should consider relevant advice within Local Air Quality Management guidance and PM2.5 targets guidance.	appropriate action to minimise emissions of $PM_{2.5}$ and its precursors as far as is reasonably practicable". Consideration of exposure to $PM_{2.5}$ has been demonstrated by: Selecting a location in a rural area with low population density and with a large offset from areas of proposed solar infrastructure to the nearest residential, health care or educational properties. Selecting a site with low levels of $PM_{2.5}$ and precursors, with agricultural activities being the main baseline source. Recognising the inherently very low level of emissions of $PM_{2.5}$ and precursors associated with the operation of the Proposed Development and seeking to minimise construction phase exposure through good practice control measures set out in the **Framework CEMP [EN010154/APP/7.7].** The Proposed Development considers both actions and mitigation measures to minimise cumulative $PM_{2.5}$ exposure for development users and nearby residents by: Managing road vehicle movements associated with the Proposed Development through the **Framework CTMP [EN010154/APP/7.18].**
Paragraph 5.2.15	Many activities involving air emissions are subject to pollution control. The considerations set out in Section 4.12 on the interface between planning and pollution control therefore apply. The Secretary of State must also consider duties under other legislation including duties under the Environment Act 2021 in relation to environmental targets and have regard to policies set out in the Government's Environmental Improvement Plan 2023.	

Policy paragraph	Policy description	Compliance commentary
		Managing emissions from Non-Road Mobile Machinery and construction works through good practice measures included in the **Framework CEMP [EN010154/APP/7.7].** Most exposure to $PM_{2.5}$ is associated with the contribution from long range transport. By producing electrical power from renewable sources, the Proposed Development will reduce the regional $PM_{2.5}$ and precursor emission footprint of the national grid. As described in **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]**, there are no significant adverse effects identified on air quality arising from the Proposed Development. Since no significant adverse effects have been identified, no additional mitigation or enhancement measures are required, beyond the good practice measures described. The adoption of good site practice will be implemented via the detailed CEMP and DEMP which build on the **Framework CEMP [EN010154/APP/7.7]** and **Framework DEMP [EN010154/APP/7.9]** through measures to control dust as outlined within the IAQM guidance. This is a precautionary approach and involves adopting widely used good practice measures, without any additional site-specific mitigation.

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		The development of a detailed CTMP, CEMP and DEMP is secured by Requirements 14, 12 and 20, under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 5.2.16	The Secretary of State should give air quality considerations substantial weight where a project would lead to a deterioration in air quality. This could for example include where an area breaches any national air quality limits or statutory air quality objectives. 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 statutory limits, objectives or targets.	**Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** demonstrates that no significant adverse effects are expected to arise as result of the Proposed Development, and in particular, no substantial changes to air quality are expected. Additionally, no statutory limits, objectives, or targets are breached. The Proposed Development is not located within an Air Quality Management Area (AQMA).
Paragraph 5.2.17	The Secretary of State should give air quality considerations substantial weight where a project is proposed near a sensitive receptor site, such as an education or healthcare facility, residential use or a sensitive or protected habitat.	The Applicant has demonstrated consideration of sensitive receptors in Section 3.2 of the **Design Approach Document [EN010154/APP/7.3],** noting the exclusion of areas close to sensitive human receptors in stage 2 of the site selection process. As confirmed within the air quality section of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]**, the Proposed Development is not located near to a sensitive receptor site for air quality.
Paragraph 5.2.18	Where a project is proposed near to a sensitive receptor site for air quality, if the applicant cannot provide justification for this location, and a suitable mitigation plan, the Secretary of State should refuse consent.	
Paragraph 5.2.19	In all cases, the Secretary of State must take account of any relevant statutory air quality limits, objectives and	**Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** demonstrates that no significant

Policy paragraph	Policy description	Compliance commentary
	targets. If a project will lead to non-compliance with a statutory limit, objective or target the Secretary of State should refuse consent.	adverse effects arise as result of the Proposed Development, and no statutory limits, objectives, or targets are breached.
Paragraph 5.7.1	During the construction, operation and decommissioning of energy infrastructure there is potential for the release of a range of emissions such as odour, dust, steam, smoke, artificial light and infestation of insects. All have the potential to have a detrimental impact on amenity or cause a common law nuisance or statutory nuisance under Part III, Environmental Protection Act 1990. However, they are not regulated by the environmental permitting regime, so mitigation of these impacts will need to be included in the Development Consent Order.	**Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** assesses the Proposed Development against sensitive receptors. This assessment concludes that with the implementation of the good practice measures, as detailed in the **Framework CEMP [EN010154/APP/7.7]** the impact of the construction phase would be negligible. The effects of decommissioning are expected to be similar, if not less than construction, and with the implementation of the measures set out in the **Framework DEMP [EN010154/APP/7.9]** these are also assessed as negligible. There will be no activities during operation expected to generate dust or air quality emissions, demonstrating that no significant adverse effects will arise as result of the Proposed Development. However, embedded mitigation measures are implemented in accordance with good site practice as a precautionary approach, via the **Framework OEMP [EN010154/APP/7.8].**
Paragraph 5.7.3	Because of the potential effects of these emissions and infestation, and in view of the availability of the defence of statutory authority against nuisance claims described in Section 4.15, it is important that the potential for these impacts is considered by the applicant and Secretary of State.	
Paragraph 5.7.4	For energy NSIPs of the type covered by this NPS, some impact on amenity for local communities is likely to be unavoidable. The aim should be to keep impacts to a minimum, and at a level that is acceptable.	

Policy paragraph	Policy description	Compliance commentary
Paragraph 5.7.5	The applicant should assess the potential for…. emissions of odour, dust,... and artificial light, to have a detrimental impact on amenity, as part of the ES.	**Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** contains a Dust Risk Assessment (DRA), which follows IAQM guidance. This provides a robust worst-case assessment, ensuring that if works are undertaken in a different location than anticipated, then the assessment has adequately covered this possibility in establishing the potential for likely significant air quality effects. This risk level is used to apply the appropriate level of good practice such that there is no significant effect. Details of the DRA are in **Appendix 14-B: Dust Risk Assessment** of the ES **[EN010154/APP/6.3].** The good practice measures are secured via the **Framework CEMP [EN010154/APP/7.7]** a detailed version of which is secured via Requirement 12 under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1].** No areas of the Proposed Development are proposed to be continuously lit. For security reasons, operational lighting would include Passive Infra-red Detector (PID) systems which would be installed around the perimeter of the Proposed Development. Mitigation measures are proposed to minimise the impacts of light pollution, including measures set out within the **Framework CEMP [EN010154/APP/7.7]** and **Framework DEMP [EN010154/APP/7.9]**, detailed versions of which are secured under of Requirements 12 and 20 in Schedule

Policy paragraph	Policy description	Compliance commentary
		2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 5.7.6	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 • measures to be employed in preventing or mitigating the emissions	**Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** contains an assessment of air quality in accordance with the requirements of the policy set out in paragraph 5.7.6. The chapter concludes that there are no significant adverse effects anticipated as a result of the Proposed Development, however embedded mitigation measures are implemented in accordance with good site practice as a precautionary approach. These will be provided through the **Framework CEMP [EN010154/APP/7.7]**, **Framework OEMP [EN010154/APP/7.8],** and **Framework DEMP [EN010154/APP/7.9]** of which detailed plans are secured under Requirements 12, 13, and 20 in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 5.7.7	The applicant is advised to consult the relevant local planning authority and, where appropriate, the EA about the scope and methodology of the assessment.	The Applicant consulted with North Kesteven District Council, Lincolnshire County Council and the Environment Agency as part of the Statutory Consultation which commenced on 21 October 2024 and ran until 2 December 2024. The **Consultation Report [EN010154/APP/5.1]** sets out the Applicant's response to the comments provided.

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Paragraph 5.7.8	Mitigation measures may include one or more of the following: • engineering: prevention of a specific emission at the point of generation; control, containment and abatement of emissions if generated • lay-out: adequate distance between source and sensitive receptors; reduced transport or handling of material • administrative: limiting operating times; restricting activities allowed on the site; implementing management plans	Mitigation measures relating to air quality and lighting are provided through the **Framework CEMP [EN010154/APP/7.7]**, **Framework OEMP [EN010154/APP/7.8],** and **Framework DEMP [EN010154/APP/7.9]** of which detailed plans are secured under Requirements 12, 13, and 20 in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 5.7.9	Construction should be undertaken in a way that reduces emissions, for example the use of low emission mobile plant during the construction, and demolition phases as appropriate, and consideration should be given to making these mandatory in Development Consent Order requirements.	Measures to reduce emissions during construction and decommissioning are set out in the **Framework CEMP [EN010154/APP/7.7]** and **Framework DEMP [EN010154/APP/7.9]** and include the following**:** a. Switching vehicles and plant off when not in use and ensuring construction vehicles conform to current EU emissions standards; b. Conducting regular planned maintenance of the construction plant and machinery to optimise efficiency; and c. Developing and implementing a Dust Management Plan (DMP) as part of the

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		detailed CEMP, which may include measures to control other emissions, approved by the Local Authority. Production of a detailed CEMP and DEMP are secured under Requirements 12 and 20 in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 5.7.11	A construction management plan may help clarify and secure mitigation	The **Framework CEMP [EN010154/APP/7.7]** sets out mitigation measures during construction and isa detailed CEMP is to be secured in detail under Requirement 12 in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 5.7.12	The Secretary of State should satisfy itself that: • an assessment of the potential for ….dust, odour…, to have a detrimental impact on amenity has been carried out • that all reasonable steps have been taken, and will be taken, to minimise any such detrimental impacts	A full assessment of potential air quality impacts has been carried out for the Proposed Development. **Appendix 14-B: Dust Risk Assessment** of the ES **[EN010154/APP/6.3]** provides an assessment of dust and **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** for air quality. The assessments have demonstrated there are no significant effects as a result of the Proposed Development in relation to air quality. Good practice measures have been described through the **Framework CEMP [EN010154/APP/7.7]**, the **Framework OEMP [EN010154/APP/7.8]**, and the **Framework DEMP [EN010154/APP/7.9]** to be secured

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		in detail via Requirements 12, 13 and 20 in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Greenhouse Gas Emissions		
Paragraph 5.3.4	All proposals for energy infrastructure projects should include a GHG assessment as part of their ES (See Section 4.3). This should include: • A whole life GHG assessment showing construction, operational and decommissioning GHG impacts, including impacts from change of land use. • An explanation of the steps that have been taken to drive down the climate change impacts at each of those stages. • Measurement of embodied GHG 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 techniques for that type of technology.	**Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** contains a Greenhouse Gas Emissions Assessment, undertaken in line with the Institute of Environmental Management and Assessment (IEMA) Guidance. The GHG assessment represents a 'worst-case scenario' based on the parameters defined in **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]**. Fixed south facing panels have been selected as a worst-case scenario because they require a higher number of panels, may produce a potential lower annual yield, and have higher embodied carbon in comparison to tracking panels. Two battery options have been considered, distributed and centralised BESS. As both options have the same power capacity of 480MWh, both options are assumed to result in the same GHG estimate This is considered in line with best practice and IEMA guidance on assessing GHGs. The assessment methodology is detailed within Section 6.4 of **Chapter 6: Climate Change** of the ES

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	• Calculation of operational energy consumption and associated carbon emissions. • Whether and how any residual GHG emissions will be (voluntarily) offset or removed using a recognised framework. • 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	**[EN010154/APP/6.1]**. The assessment considers all phases of the Proposed Development. A number of embedded mitigation measures have been integrated into the design of the Proposed Development to ensure GHG emissions are minimised. This includes specific measures for the operational phase to ensure energy demand and consumption are reduced. The operational phase of the Proposed Development results in a reduction in GHG emissions when compared to the do-nothing scenario, demonstrating the positive impact it has on energy demand. The GHG emissions have been considered against the UK Carbon budgets. During the operational phase it is shown that the Proposed Development will not exceed 0.1% of the respective UK Carbon Budget. Measures for reducing construction GHG impacts are suggested in the **Framework CEMP [EN010154/APP/7.7]** and **Framework DEMP [EN010154/APP/7.9]** to be secured by Requirements 12 and 20 as part of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. The consideration of energy generation yield is demonstrated within the design evolution of the Proposed Development which is detailed within

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		Chapter 4: Alternatives and Design Evolution of the ES **[EN010154/APP/6.1]**.
Paragraph 5.3.5	A GHG assessment should be used to drive down GHG emissions at every stage of the proposed development and ensure that emissions are minimised as far as possible for the type of technology, taking into account the overall objectives of ensuring our supply of energy always remains secure, reliable and affordable, as we transition to net zero.	As set out in **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]**, a Lifecycle GHG Impact Assessment has been undertaken. The assessment covers all direct GHG emissions arising from activities undertaken at the DCO Site during the construction, operation (including maintenance), and decommissioning of the Proposed Development. It also includes indirect emissions embedded within the construction products (e.g. solar PV Panels, BESS and cables) and construction materials (e.g. the steel required to construct the PV mounting structures) arising from their production, as well as emissions arising from the transportation of products and materials, waste and construction workers. As identified in **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]**, the GHG savings achieved throughout the lifetime of the Proposed Development demonstrate the role solar energy generation has to play in the transition to, and longer-term maintenance of, a low carbon economy. Without low-carbon energy generation projects such as the Proposed Development, the average grid GHG intensity will not decrease as is projected, which would adversely affect the UK's ability to meet its carbon reduction targets.

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Paragraph 5.3.6	Applicants should look for opportunities within the proposed development to embed nature-based or technological solutions to mitigate or offset the emissions of construction and decommissioning.	A full breakdown of the embedded mitigation measures of the Proposed Development is provided in Section 5 of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]**. This includes measures relating to flood risk, climate change predictions and a consideration of future climate conditions when selecting species for use in green infrastructure.
Paragraph 5.3.7	Steps taken to minimise and offset emissions should be set out in a GHG Reduction Strategy, secured under the Development Consent Order. The GHG Reduction Strategy should consider the creation and preservation of carbon stores and sinks including through woodland creation, hedgerow creation and restoration, peatland restoration and through other natural habitats.	
Paragraph 5.3.8	The Secretary of State must be satisfied that the applicant has as far as possible assessed the GHG emissions of all stages of the development.	**Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** presents a lifecycle GHG impact assessment over the lifetime of the Proposed Development. The assessment methodology, results, and associated mitigation measures are detailed in Section 6.4 of the Chapter.
Paragraph 5.3.9	The Secretary of State should be content that the applicant has taken all reasonable steps to reduce the GHG emissions of the construction and decommissioning stage of the development.	Consideration of every stage of development is set out in **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** and also the accompanying Framework Plans, to be secured by Requirement 12 (**Framework CEMP [EN010154/APP/7.7]**), 13 (**Framework OEMP [EN010154/APP/7.8]**), and 20 (**Framework DEMP [EN010154/APP/7.9]**) under

Policy paragraph	Policy description	Compliance commentary
		Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**
Paragraph 5.3.10	The Secretary of State should give appropriate weight to projects that embed nature-based or technological processes to mitigate or offset the emissions of construction and decommissioning within the proposed development. However, in light of the vital role energy infrastructure plays in the process of economy wide decarbonisation, the Secretary of State must accept that there are likely to be some residual emissions from construction and decommissioning of energy infrastructure.	**Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** notes the annual emissions from construction are consistent with applicable existing and emerging policy requirements and result in non-significant minor adverse effects. Emissions from decommissioning are anticipated to be similar, resulting in non-significant minor adverse effects on the climate. The Applicant has sought to reduce GHG emissions in the construction and decommissioning stages of the development through measures which are secured within the **Framework CEMP [EN010154/APP/7.7]** and **Framework DEMP [EN010154/APP/7.9]**. Measures set out within the **Framework CEMP [EN010154/APP/7.7]** and **Framework DEMP [EN010154/APP/7.9]** include but are not limited to minimising waste through the design, construction, and implementation of the Proposed Development; implementing a Travel Plan as part of the **Framework CTMP [EN010154/APP/7.18]**; and switching vehicles and plant off when not in use. Section 6.8 of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** concludes that the payback period for the whole lifecycle carbon of the Proposed Development is twelve years of operation, with further carbon savings delivered for each subsequent year of

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		operation. This demonstrates the contribution that the Proposed Development will have towards the UK meeting its legally binding carbon budgets over the estimated 60-year operational phase. This highlights the vital role the Proposed Development will play in the decarbonisation of the economy.
Biodiversity and Geological Conservation		
Paragraph 5.4.4	The highest level of biodiversity protection is afforded to sites identified through international conventions. 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.	The **HRA Report [EN010154/APP/7.13]** concludes that there will be no significant effects to any European site or sites either from the construction, operation and maintenance and decommissioning of the Proposed Development or in combination with other plans and projects.
Paragraph 5.4.5	As a matter of policy, the following should be given the same protection as sites covered by the Habitats Regulations and an HRA will also be required: (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 any of the other sites covered by this paragraph.	

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Paragraph 5.4.7	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. Most National Nature Reserves are notified as SSSIs.	**Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** demonstrates consideration of SSSI's and all ecological designations. Section 8.6 of the chapter identifies designated ecologically important sites. The chapter concludes no significant adverse effects are identified for Important Ecological Features (IEF's) during any phase of the Proposed Development.
Paragraph 5.4.8	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 site is not located within an SSSI although there is a SSSI within the 5km study area. **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** confirms, as concluded in the **HRA Report [EN010154/APP/7.13]**, there will be no likely significant effects on European sites or SSSIs arising from the Proposed Development. This includes consideration of construction traffic and pollution prevention. The **Framework CTMP [EN010154/APP/7.18]** confirms there is no risk of sensitive habitats being degraded due to vehicle pollutants from construction traffic. Embedded mitigation measures contained within the **Framework CEMP [EN010154/APP/7.7]** ensure no impact on the integrity or functioning of the SSSI.
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	**Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** includes consideration of sites of regional and local biodiversity importance.

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	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.	Whisby Nature Park LNR is approximately 410m north of the Order Limits and Swanholme Lakes LNR / SSSI is approximately 4km north-east of the Order Limits. The design of the Proposed Development has also sought to avoid impacts to Local Wildlife Sites (LWSs)'. For example, Stocking Wood LWS was removed from the Order Limits. The design evolution of the Proposed Development is described in full in the **Design Approach Document [EN010154/APP/7.3]**.
Paragraph 5.4.13	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 Proposed Development avoids direct impacts to statutorily designated sites as they are outside of the Order Limits. No significant adverse effects have been identified during construction, operation or decommissioning of the Proposed Development. As stated in **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1],** the Proposed Development has the potential to generate beneficial effects for a number of the Important Ecological Features (IEFs) identified in occurring in both aquatic and terrestrial habitats, from the cessation of farming practices including agricultural chemical inputs to watercourses and pesticide use on crops, as well as the extensive creation of grassland habitats and positive management of existing boundary features.

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Paragraph 5.4.14	Irreplaceable habitats are habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity.	No irreplaceable habitats are proposed to be lost as part of the Proposed Development.
Paragraph 5.4.15	Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Keepers of Time, the government's policy for ancient and native trees and woodlands in England sets out the government's commitment to maintain and enhance the existing area of ancient woodland, maintain and enhance the existing resource of known ancient and veteran trees, excluding natural losses from disease and death, and to increase the percentage of ancient woodland in active management. Ancient or veteran trees found outside ancient woodland are also particularly valuable. Other types of irreplaceable habitats include blanket bog, limestone pavement, coastal sand dunes, spartina salt marsh swards, mediterranean saltmarsh scrub, and lowland fen.	No Ancient Woodland is within the Order Limits and an assessment of the potential impacts on broadleaved woodland or Ancient Woodland adjacent to the Order Limits is included in **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]**. Veteran and ancient trees were recorded within the Order Limits and will be retained and protected (see **Appendix 10-G: Arboricultural Impact Assessment** of the ES **[EN010154/APP/6.3].** As presented in **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]**, there will be no direct or indirect impacts to woodland habitats or veteran/ancient trees.
Paragraph 5.4.17	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 (including those outside England), on protected species and on habitats and other species identified as being of	**Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** assesses the 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

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	principal importance for the conservation of biodiversity, including irreplaceable habitats.	conservation of biodiversity, including irreplaceable habitats. The assessment methodology is detailed in Section 5 of the chapter.
Paragraph 5.4.18	The applicant should provide environmental information proportionate to the infrastructure where EIA is not required to help the Secretary of State consider thoroughly the potential effects of a proposed project.	**Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** concludes there are no significant adverse effects identified in the construction, operation or decommissioning of the Proposed Development.
Paragraph 5.4.19	The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests.	Section 3.9 of the **Design Approach Document [EN010154/APP/7.3]** notes how the design of the Proposed Development set out to maximise opportunities to create appropriate multifunctional spaces to achieve energy generation, continued agricultural use, biodiversity enhancements, water and flood management, and green spaces, in addition to delivering project wide BNG. Section 4.4 notes how the design has changed in consideration to increasing opportunities for BNG. The **Framework LEMP [EN010154/APP/7.15]** contains details of the ecological mitigation and enhancement to biodiversity. Additionally, the Proposed Development will meet a minimum of 10% BNG, as set out within the **Biodiversity Net Gain Report [EN010154/APP/7.12]**. **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** states the Proposed
Paragraph 5.4.20	Applicants should consider wider ecosystem services and benefits of natural capital when designing enhancement measures.	
Paragraph 5.4.21	As set out in Section 4.7, the design process should embed opportunities for nature inclusive design. Energy infrastructure projects have the potential to deliver significant benefits and enhancements beyond Biodiversity Net Gain, which result in wider environmental gains (see Section 4.6 on Environmental and Biodiversity Net Gain). The scope of potential gains will be dependent on the type, scale, and location of each project.	

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		Development has the potential to generate beneficial effects for a number of the IEF's assessed. It is considered that the Applicant demonstrates the Proposed Development has taken advantage of opportunities to conserve and enhance biodiversity and accords with policy.
Paragraph 5.4.22	The design of Energy NSIP proposals will need to consider the movement of mobile / migratory species such as birds, fish and marine and terrestrial mammals and their potential to interact with infrastructure. As energy infrastructure could occur anywhere within England and Wales, both inland and onshore and offshore, the potential to affect mobile and migratory species across the UK and more widely across Europe (transboundary effects) requires consideration, depending on the location of development.	As set out in **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]**, surveys for breeding and non-breeding birds have been undertaken across the Order Limits. The ES Chapter assesses the impacts on breeding and non-breeding birds including displacement, with appropriate bird mitigation land provided. The risk of collision between birds and solar panels was not raised as a concern by Natural England during statutory consultation and there is little conclusive evidence on the impacts of glint and glare from operational solar farms on birds. It is accepted industry practice that solar panel installation does not require a collision risk assessment. In the context of existing vegetation in the landscape, e.g. hedgerows, trees and woodland, the solar PV panels will not cause a physical impediment to bird movements across the landscape. Equally, birds transiting across the landscape are doing so on a broad front, i.e., there are no topographical or geographical

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		features in the landscape to 'funnel' or concentrate bird movements.
Paragraph 5.4.25	The applicant should seek the advice of the appropriate Statutory Nature Conservation Bodies (SNCB) and provide the Secretary of State with such information as the Secretary of State may reasonably require, to determine whether an HRA Appropriate Assessment (AA) is required. Applicants can request and agree 'Evidence Plans' with SNCBs, which is a way to record upfront the information the applicant needs to supply with its application, so that the HRA can be efficiently carried out. If an AA is required, the applicant must provide the Secretary of State with such information as may reasonably be required to enable the Secretary of State to conduct the AA. This should include information on any mitigation measures that are proposed to minimise or avoid likely significant effects	The Applicant engaged with Natural England during Non-Statutory and Statutory Consultation and through ongoing technical engagement. The **Consultation Report [EN010154/APP/5.1]** provides details of this engagement. In response to the HRA report submitted with the Preliminary Environmental Information (PEI) Report, Natural England agreed with the assessment and within their response to statutory consultation confirmed their agreement with the conclusion of the HRA Report, that the Proposed Development would not impact upon European sites. Lincolnshire County Council also agreed with the conclusion of the HRA report, as presented in **Table 8-2** of **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1],**
Paragraph 5.4.26	If, during the pre-application stage, the SNCB indicate that the proposed development is likely to adversely impact the integrity of habitat sites, the applicant must include with their application such information as may reasonably be required to assess a potential derogation under the Habitats Regulations.	The **HRA Report [EN010154/APP/7.13]** determines there will be no significant effects to any European site or sites either from the construction, operation and maintenance and decommissioning of the Proposed Development or in combination with other plans and projects.
Paragraph 5.4.27	If the SNCB gives such an indication at a later stage in the development consent process, the applicant must provide this information as soon as is reasonably	The procedure, should more information be required, is noted.

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	possible and before the close of the examination. This information must include assessment of alternative solutions, a case for Imperative Reasons of Overriding Public Interest (IROPI) and appropriate environmental compensation.	
Paragraph 5.4.28	Provision of such information will not be taken as an acceptance of adverse impacts and if an applicant disputes the likelihood of adverse impacts, it can provide this information as part of its application 'without prejudice' to the Secretary of State's final decision on the impacts of the potential development. If, in these circumstances, an applicant does not supply information required for the assessment of a potential derogation, there will be no expectation that the Secretary of State will allow the applicant the opportunity to provide such information following the examination.	
Paragraph 5.4.29	It is vital that applicants consider the need for compensation as early as possible in the design process as 'retrofitting' compensatory measures will introduce delays and uncertainty to the consenting process.	As set out in **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]**, the assessment concludes there are no significant adverse effects identified in the construction, operation or decommissioning of the Proposed Development, therefore no compensatory measures are considered.
Paragraph 5.4.30	Applicants should work closely at an early stage in the pre-application process with SNCB and Defra/Welsh Government to develop a compensation plan for all protected sites adversely affected by the development.	During statutory consultation and following the HRA Report submitted during the PEI, Natural England have agreed that the Proposed Development would not impact upon European sites. Lincolnshire County

Policy paragraph	Policy description	Compliance commentary
	Applicants should engage with the relevant Local Planning Authority at an early stage regarding the proposed location of compensatory measures. Applicants should also take account of any strategic plan level compensation plans in developing project level compensation plans.	Council were further consulted and further agreed with the conclusions of the HRA Report. The Applicant was therefore not required to submit any compensation plans.
Paragraph 5.4.32	Applicants should include measures to mitigate fully the direct and indirect effects of development on ancient woodland, ancient and veteran trees or other irreplaceable habitats during both construction and operational phase.	As presented in **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]**, there will be no direct or indirect impacts to woodland habitats or veteran/ancient trees. There is no Ancient Woodland within the Order Limits, however, veteran and ancient trees were recorded within the Order Limits. Veteran and ancient trees will be retained and protected, as set out in **Appendix 10-G: Arboricultural Impact Assessment** of the ES **[EN010154/APP/6.3].** Section 3.16 of the **Framework CEMP [EN010154/APP/7.7]** contains environmental protection measures which to minimise impacts to veteran and ancient trees.
Paragraph 5.4.33	Applicants should consider any reasonable opportunities to maximise the restoration, creation, and enhancement of wider biodiversity, and the protection and restoration of the ability of habitats to store or sequester carbon as set out under Section 4.6.	Section 3.9 of the **Design Approach Document [EN010154/APP/7.3]** notes how the design of the Proposed Development set out to maximise opportunities to create appropriate multifunctional spaces to achieve energy generation, continued

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Paragraph 5.4.34	Consideration should be given to improvements to, and impacts on, habitats and species in, around and beyond developments, for wider ecosystem services and natural capital benefits, beyond those under protection and identified as being of principal importance. This may include considerations and opportunities identified through Local Nature Recovery Strategies, and national goals and targets set through the Environment Act 2021 and the Environment Improvement Plan 2023.	agricultural use, biodiversity enhancements, water and flood management and green spaces. The design of the Proposed Development includes habitat creation and enhancement. The mitigation hierarchy has been applied to avoid impacts and minimise those which are unavoidable. Additionally, where practicable, habitats have been enhanced through measures as stated in the **Framework LEMP [EN010154/APP/7.15]** and **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]**. This includes: a. Woodland planting; b. The natural regeneration of hedgerows; c. Scrub to provide shelter and food resources for birds and other wildlife; d. Natural regeneration areas; e. Species-rich grassland and arable field margins; f. Pond restoration and planting around; g. A range of artificial bird and bat boxes; and h. Creation of habitat piles. The **Framework LEMP [EN010154/APP/7.15]** sets out the measures for delivering landscape and ecological enhancements. A detailed LEMP is secured under

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		Requirement 8 in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. BNG is proposed as part of the Proposed Development.
Paragraph 5.4.35	Applicants should include appropriate avoidance, mitigation, compensation and enhancement 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 • 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 • opportunities will be taken to enhance existing habitats rather than replace them, and where practicable, create new habitats of value within the site landscaping proposals. Where habitat creation is required as mitigation, compensation,	**Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]** notes the identification and avoidance of internationally and nationally designated biodiversity sites due to the high level of protection they are afforded within nationally planning policy. Section 3.9 of the **Design Approach Document [EN010154/APP/7.3]** notes how the design of the Proposed Development will maximise opportunities to create appropriate multifunctional spaces to achieve energy generation, continued agricultural use, biodiversity enhancements, water and flood management and green spaces. A range of embedded mitigation measures as outlined in Section 8.10 of **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** and set out within the **Framework CEMP [EN010154/APP/7.7]**, **Framework OEMP [EN010154/APP/7.8], Framework DEMP [EN010154/APP/7.9],** and **Framework LEMP [EN010154/APP/7.15],** have been included within the design of the Proposed Development. A detailed version of the framework plans will be secured via Requirements 12, 13, 20 and 8 under Schedule 2 of the

Policy paragraph	Policy description	Compliance commentary
	or enhancement, the location and quality will be of key importance. In this regard habitat creation should be focused on areas where the most ecological and ecosystems benefits can be realised. • Mitigations required as a result of legal protection of habitats or species will be compiled with	**Draft Development Consent Order [EN010154/APP/3.1]**. Additionally, a number of measures for habitat creation and enhancement have been included within the design of the Proposed Development for the purpose of enhancing biodiversity. These are presented in Annex A of the **Framework LEMP [EN010154/APP/7.15].**
Paragraph 5.4.36	Applicants should produce and implement 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 adverse impacts on biodiversity during the construction and operation stages.	The **Framework CEMP [EN010154/APP/7.7]**, **Framework OEMP [EN010154/APP/7.8], Framework DEMP [EN010154/APP/7.9], and Framework LEMP [EN010154/APP/7.15],** provides for the management of biodiversity with regard to the Proposed Development. A detailed version of these framework plans will be provided and secured via Requirement 12, 13, 20, and 8 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]. The Framework CEMP [EN010154/APP/7.7]** sets out that the detailed CEMP will include training requirements for relevant personnel on environmental topics.
Paragraph 5.4.39	The government's 25 Year Environment Plan and the Environment Act 2021 mark 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 Environmental Improvement Plan and any	The Applicant has considered the Environment Act 2021 and includes provision for BNG as part of the Proposed Development.

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	relevant measures and targets, including statutory targets set under the Environment Act or elsewhere	**Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** demonstrates the Proposed Development has the potential to generate beneficial effects for a number of the important ecological features. As demonstrated within the **Biodiversity Net Gain Report [EN010154/APP/7.12]**, on the basis of the illustrative design, the Proposed Development could achieve a net gain of 30% for area-based habitat units, 50% for hedgerow units, and 10% for watercourse units. BNG contributions are secured via the **Framework LEMP [EN010154/APP/7.15]** and under Requirement 8 in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 5.4.41	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.	
Paragraph 5.4.42	As a general principle, and subject to the specific policies below, development should, in line with the mitigation hierarchy, aim to avoid significant harm to biodiversity and geological conservation interests, including through consideration of reasonable alternatives (as set out in Section 4.3 above). Where significant harm cannot be avoided, impacts should be mitigated and as a last resort, appropriate compensation measures should be sought.	The mitigation hierarchy has been applied to the design and development of the Proposed Development as described in Section 7 of the **Planning Statement [EN010154/APP/7.2]**. Benefits of the Proposed Development, as identified in Section 5, include the enhancement of habitats where practicable. The **Design Approach Document [EN010154/APP/7.3]** demonstrates how consideration of biodiversity, habitat, and species has been reflected within the design of the Proposed Development. Measures taken to minimise any impacts are detailed within **Chapter 8: Ecology and Nature Conservation**
Paragraph 5.4.43	If significant harm to biodiversity resulting from a development cannot be avoided (for example through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated	

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	for, then the Secretary of State will give significant weight to any residual harm.	of the ES **[EN010154/APP/6.1]** in Section 10 of the chapter. The embedded mitigation measures are also set out within the **Framework CEMP [EN010154/APP/7.7]**, **Framework OEMP [EN010154/APP/7.8]** and **Framework DEMP [EN010154/APP/7.9]** to be secured in final by Requirements 12, 13 and 20 as set out under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** concludes the Proposed Development has the potential to generate beneficial effects for a number of the important ecological features identified. In addition, the assessment concludes there are no significant adverse effects identified in the construction, operation or decommissioning of the Proposed Development.
Paragraph 5.4.44	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 including linkages with existing habitats for compensation or biodiversity net gain should generally be maintained for a	The **Framework LEMP [EN010154/APP/7.15], Framework CEMP [EN010154/APP/7.7]**, and **Framework OEMP [EN010154/APP/7.8]** details measures for the mitigation and enhancement of habitats and biodiversity over the lifetime of the project Proposed Development, which are secured in detail by

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	minimum period of 30 years, or for the lifetime of the project, if longer.	Requirements 8, 12 and 13 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 5.4.45	The Secretary of State will need to take account of what mitigation measures may have been agreed between the applicant and the SNCB and the MMO/NRW (where appropriate). The Secretary of State will also need to consider whether the SNCB or the MMO/NRW has granted or refused, or intends to grant or refuse, any relevant licences, including protected species mitigation licences	Section 3.5 of the **Consultation Report [EN010154/APP/5.1]** sets out how the applicant has consulted with the appropriate Statutory Nature Conservation Bodies, including Natural England and the Environment Agency
Paragraph 5.4.46	Development proposals provide many opportunities for building-in beneficial biodiversity or geological features as part of good design. The Secretary of State should give appropriate weight to environmental and biodiversity enhancements, although any weight given to gains provided to meet a legal requirement (for example under the Environment Act 2021) is likely to be limited.	As demonstrated within the **Biodiversity Net Gain Report [EN010154/APP/7.12]**, on the basis of the illustrative design, the Proposed Development could achieve a net gain of 30% for area-based habitat units, 50% for hedgerow units, and 10% for watercourse units which are secured under the **Framework LEMP [EN010154/APP/7.15]** and by Requirement 8 in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 5.4.47	When considering proposals, the Secretary of State should maximise such reasonable opportunities in and around developments, using requirements or planning obligations where appropriate. This can help towards delivering biodiversity net gain as part of or in addition to the approach set out at Section 4.6.	The BNG for the Proposed Development is to be secured by Requirement 8 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.

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Paragraph 5.4.48	In taking decisions, the Secretary of State 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.	The assessment of the Proposed Development's impact on features referred to is set out in **Chapter 8: Ecology and Nature Conservation of** the ES **[EN010154/APP/6.1]**.
Paragraph 5.4.49	The Secretary of State must consider whether the project is likely to have a significant effect on a protected site which is part of the National Site Network (an habitat site), a protected marine 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.	As concluded within the **HRA Report [EN010154/APP/7.13]** there are no significant effects to any European site or sites from the construction, operation and maintenance, and or decommissioning of the Proposed Development or in combination with other plans and projects. **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** concludes there are no significant adverse effects identified in the construction, operation or decommissioning of the Proposed Development. **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** concludes there are no significant adverse effects identified in the construction, operation or decommissioning of the Proposed Development on the National Site Network.
Paragraph 5.4.50	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	**Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** details how the Proposed Development has sought to avoid significant harm to biodiversity and taken advantage of opportunities to

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	conservation and enhancement of the site's biodiversity or geological interest.	conserve and enhance biodiversity. Section 8.10 of **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** outlines the embedded mitigation measures which aim to conserve and enhance biodiversity conservation interests, which are secured by Requirements in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 5.4.52	The Secretary of State should give due consideration to 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.	**Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** assess impacts on ecological features which includes those designated at a local and regional level. It concludes there are no significant adverse effects identified in the construction, operation or decommissioning of the Proposed Development.
Paragraph 5.4.53	The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists.	No loss or deterioration of irreplaceable habitats is predicted. As presented in **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]**, there will be no direct or indirect impacts to woodland habitats or veteran/ancient trees. There is no Ancient Woodland within the Order Limits, however, veteran and ancient trees were recorded within the Order Limits. Veteran and ancient trees will be retained and protected, as set out in **Appendix 10-G: Arboricultural Impact Assessment** of the ES **[EN010154/APP/6.3].**

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Paragraph 5.4.54	The Secretary of State should ensure that species and habitats identified as being of importance for the conservation of biodiversity are protected from the adverse effects of development by using requirements, planning obligations, or licence conditions where appropriate.	Section 8.12 of **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** assesses Important Ecological Features (IEFs) through desk study and field surveys. Following the inclusion of embedded mitigation measures, which are set out within the **Framework CEMP [EN010154/APP/7.7]**, **Framework DEMP [EN010154/APP/7.9]**, **Framework OEMP [EN010154/APP/7.8]**, and **Framework LEMP [EN010154/APP/7.15]**, and which are secured by Requirements in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1],** it concludes there are no significant adverse effects identified in the construction, operation or decommissioning of the Proposed Development.
Paragraph 5.4.55	The Secretary of State should refuse consent where harm to a protected species and relevant habitats would result, unless there is an overriding public interest and other relevant legal tests are met. In this context the Secretary of State should give substantial weight to any such harm to the detriment of biodiversity features of national or regional importance or the climate resilience and the capacity of habitats to store carbon, which it considers may result from a proposed development	
Aviation		
Paragraph 5.5.5	UK airspace is important for both civilian and military aviation interests. It is essential that new energy infrastructure is developed collaboratively alongside aerodromes, aircraft, air systems and airspace so that safety, operations and its capabilities are not adversely affected by new energy infrastructure. Likewise, it is essential that aerodromes, aircraft, air systems and airspace operators work collaboratively with energy	All the relevant aviation interests were consulted during the Statutory Consultation. Further details can be found within the **Consultation Report [EN010154/APP/5.1]** and its **appendices [EN010154/APP/5.2].** Comments received by aviation interests, such as from the Ministry of Defence, have been taken into account in the design of the Proposed Development, as explained in the **Design Approach Document [EN010154/APP7.3]**.

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	infrastructure developers essential for net zero. Aerodromes can have important economic and social benefits, particularly at the regional and local level, but their needs must be balanced with the urgent need for new energy developments, which bring about a wide range of social, economic and environmental benefits.	
Paragraph 5.5.37	Where the proposed development may affect the performance of civil or military aviation CNS, meteorological radars and/or other defence assets an assessment of potential effects should be set out in the ES (see Section 4.3).	Section 14.3 of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** assesses the impact of glint and glare regarding on aviation. This section concludes that the residual impacts upon aviation are acceptable and not significant. Section 14.3 of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** assesses aircraft and ministry of defence assets. It is concluded that with the embedded mitigation measures set out in Section 14.3, there would be no effect on these receptors.
Paragraph 5.5.39	The applicant should consult the MOD, Met Office, Civil Aviation Authority (CAA), NATS and any aerodrome – licensed or otherwise – likely to be affected by the proposed development in preparing an assessment of the proposal on aviation, meteorological or other defence interests.	The Applicant has engaged with the MOD, CAA and NATS during the statutory consultation The **Consultation Report [EN010154/APP/5.1]** provides details of this engagement.
Paragraph 5.5.40	Any assessment of effects on aviation, meteorological or other defence interests should include potential impacts	Section 14.3 of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** assesses the

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	of the project upon the operation of CNS infrastructure, flight patterns (both civil and military), generation of weather warnings and forecasts, other defence assets (including radar) and aerodrome operational procedures. It should also assess the demonstratable cumulative effects of the project with other relevant projects in relation to aviation, meteorological and defence.	impact of glint and glare on aviation. This section concludes that the residual impacts upon aviation are acceptable and not significant. Section 14.3 of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** assesses aircraft and ministry of defence assets. It is concluded that with the embedded mitigation measures set out in Section 14.3 of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** there would be no effect on these receptors.
Paragraph 5.5.41	In addition, consideration of developments near aerodromes should take into account the following– factors - Bird Strike Risk - Aircraft are vulnerable to wildlife strike, in particular bird strike. Birds and other wildlife may be attracted to the vicinity of an aerodrome by various types of development, for example, large buildings with perching/roosting opportunities for birds. It is therefore important that infrastructure, buildings and other elements from energy installations, as well as environmental mitigation are designed in such a way so as not to increase the bird strike risk to the airport for developments within 13km (this can vary)200. - Building Induced Turbulence - If a significant building or structure is proposed close to the	The approach to the design of bird mitigation was informed by the Ministry of Defence's response to Statutory Consultation, where their principal concern was the creation of new wetland features or the creation of new vegetative habitats that may attract and support populations of large and/or flocking birds hazardous to air traffic. The Ministry of Defence considered that the design of any solar development should take this into account and where possible limit the potential. As shown in the **Design Approach Document [EN010154/APP/7.3]**, the managed arable land and the grassland areas are well distributed throughout the site which, along with ensuring the mitigation land is well integrated into its surroundings and allows for rotation, is an approach that prevents bird flocking. There are no wetlands and large waterbodies proposed as part of the Proposed Development that might have had the potential to

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	airport/runways, there is potential for building induced turbulence/wind shear to be created which has the potential to impact on aircraft on take-off and landing. Studies may be required to identify the extent of any turbulence resulting from the energy infrastructure. - –Thermal Plume Turbulence - This is caused under certain conditions by the release of hot air from a power plant equipped with a dry cooling system. The plumes generated by these facilities have the potential to create invisible turbulence that can affect the manoeuvrability of aircraft.	increase the number of birds and create flocks that become an obstacle to aircraft. The new hedges and trees to accommodate birds are well dispersed across the DCO Site and the bird mitigation areas are required to mitigate impacts on ground nesting birds associated with the solar PV rather than creating areas that would support large, new flocks. In summary, there is no envisaged change to the risk of flocking birds to cause potential issues for aircraft, and the assessment of potential glint and glare has found similarly there are no expected issues. Similarly, with regards to turbulence, the Proposed Development does not include any significant building or structures close to the airport/runways. The **Proposed Development Parameters Document [EN010154/APP/7.4]** provides the parameters for the detailed design of the Proposed Development, including the maximum height of structures, and is secured by Requirement 6 in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. There is also no thermal plume generated by the Proposed Development; the solar PV panels are designed to absorb light, and the small increase in air temperatures that may be generated above the panels would not cause a noticeable thermal plume affecting the aviation industry.

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Paragraph 5.5.49	The Secretary of State should be satisfied that the effects on meteorological radars, civil and military aerodromes, aviation technical sites and other defence assets or operations have been addressed by the applicant and that any necessary assessment of the proposal on aviation, NSWWS or defence interests has been carried out.	Section 14.3 of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** assesses the impact of glint and glare regarding on aviation. This section concludes that the residual impacts upon aviation are acceptable and not significant. Section 14.3 of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** assesses aircraft and ministry of defence assets. It is concluded that with the embedded mitigation measures set out in Section 14.3, there would be no effect on these receptors.
Paragraph 5.5.50	In particular, the Secretary of State should be satisfied that the proposal has been designed, where possible, to minimise adverse impacts on the operation and safety of aerodromes and that realistically achievable mitigation is carried out on existing surveillance systems such as radar / tracking technologies. It is incumbent on Operators of aerodromes to regularly review the possibility of agreeing to make reasonable changes to operational procedures	All the relevant aviation interests were consulted during the Statutory Consultation. Further details can be found within the **Consultation Report [EN010154/APP/5.1]** and its **appendices [EN010154/APP/5.2].** Comments received by aviation interests, have been taken into account in the design of the Proposed Development, to minimise adverse impacts on the operation and safety of aerodromes. Section 14.3 of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** assesses the impact of glint and glare including on aviation. This section concludes that the residual impacts upon aviation are acceptable and not significant. Section 14.3 of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** assesses aircraft and ministry of defence assets. It is concluded

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		that with the embedded mitigation measures set out in Section 14.3 of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]**, there would be no effect on these receptors.
Paragraph 5.5.55	Lighting must also be designed in such a way as to ensure that there is no glare or dazzle to pilots and/or ATC, aerodrome ground lighting is not obscured and that any lighting does not diminish the effectiveness of aeronautical ground lighting and cannot be confused with aeronautical lighting. Lighting may also need to be compatible with night vision devices for military low flying purposes.	**Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]** confirms that no areas of the Proposed Development are proposed to be continuously lit. For security requirements, operational lighting would include Passive Infra-red Detector (PID) systems which would be installed around the perimeter of the Proposed Development.
Flood Risk		
Paragraph 5.8.7	Where new energy infrastructure is, exceptionally, necessary in flood risk areas (for example where there are no reasonably available sites in areas at lower risk), policy aims to make it safe for its lifetime without increasing flood risk elsewhere and, where possible, by reducing flood risk overall. It should also be designed and constructed to remain operational in times of flood.	**Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]** assesses all impacts on the water environment, which includes the consideration of flood risk throughout the lifetime of the Proposed Development. Section 9.6 in **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]** lists mitigation measures which will make the Proposed Development safe for its lifetime without increasing flood risk elsewhere and, reduce flood risk. With this mitigation in place, the Proposed Development would result in no likely significant effects resulting from any

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		stage of development as a result of the Proposed Development. Flood risk sensitivity is discussed in the Flood Risk Assessment in **Appendix 9-C: Flood Risk Assessment** of the ES **[EN010154/APP/6.3],** which reflects the comments from consultation with the Environment Agency. Climate change resilience is accounted for in **Appendix 9-D: Framework Surface Water Drainage Strategy** of the ES **[EN010154/APP/6.3].** Measures to prevent and reduce flood risk are detailed in the **Framework CEMP [EN010154/APP/7.7].**
Paragraph 5.8.9	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 defined in *https://www.gov.uk/guidance/flood-risk-and-coastal-change#table2*. 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	**Appendix 9-C: Flood Risk Assessment** of the ES **[EN010154/APP/6.3]** demonstrates the Principal Site passes both the Sequential and Exception Test. Further details are provided in Section 6 of **Appendix 9-C: Flood Risk Assessment** of the ES **[EN010154/APP/6.3].** The role of the Sequential Test in the site selection process is further detailed in Section 3 of **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2].**
Paragraph 5.8.10	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	Section 6 of the **Planning Statement [EN0154/APP/7.2]** sets out the Proposed Development's compliance with the Sequential and Exception tests.

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	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	
Paragraph 5.8.11	Both elements of the Exception Test will have to be satisfied for development to be consented. To pass the Exception Test it should be demonstrated that: • The project would provide wider sustainability benefits to the community that outweigh flood risk; and • the project 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 5.8.12	Development should be designed to ensure there is no increase in flood risk elsewhere, accounting for the predicted impacts of climate change throughout the lifetime of the development. There should be no net loss of floodplain storage and any deflection or constriction of flood flow routes should be safely managed within the	As set out in the **Design Approach Document [EN010154/APP/7.3]**, considering flood risk was a key part in the design and site selection of the Proposed Development. Only the solar PV arrays will be in Flood Zone 2 or 3.

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	site. Mitigation measures should make as much use as possible of natural flood management techniques.	Flood risk sensitivity is discussed in the Flood Risk Assessment in **Appendix 9-C: Flood Risk Assessment** of the ES **[EN010154/APP/6.3]** and concludes that flood risk from all sources will not increase as a result of the Proposed Development, within the DCO Site or elsewhere, with the proposed embedded mitigation measures in place. There will also be no net loss of floodplain storage or any deflection or constriction of flood flow routes. Climate change resilience is accounted for in **Appendix 9-D: Framework Surface Water Drainage Strategy** of the ES **[EN010154/APP/6.3].** This Framework Surface Water Drainage Strategy (Drainage Strategy) for the Principal Site aims to mimic the natural drainage conditions as far as possible, by using Sustainable Drainage Systems (SuDS) to manage surface water flows generated by the Proposed Development infrastructure. Flood risk during construction and decommissioning is managed with measures detailed in the **Framework CEMP [EN010154/APP/7.7]** and **Framework DEMP [EN010154/APP/7.9]**.
Paragraph 5.8.13	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:	A site-specific flood risk assessment is provided in **Appendix 9-C: Flood Risk Assessment** of the ES **[EN010154/APP/6.3]** due to the Proposed Development being located within Flood Zones 2 and 3 and being over 1 hectare in size.

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	• 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.	The assessment considers flood risk across all stages of development.
Paragraph 5.8.14	This assessment 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 **Appendix 9-C: Flood Risk Assessment** of the ES **[EN010154/APP/6.3]**. considers flood risk across all stages of development and future scenarios. It considers the impact of off-site flooding on third parties, and the impact of climate change. Further the mitigation requirements of design and any residual risk are considered. **Appendix 9-D: Framework Surface Water Drainage Strategy** of the ES **[EN010154/APP/6.3]**, the **Framework CEMP [EN010154/APP/7.7]**, **Framework OEMP [EN010154/APP/7.8]** and the **Framework DEMP [EN010154/APP/7.9]** include measures for how the management of flood risk will be implemented across the different stages of development. These will

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		be secured in detail by Requirements 12, 13 and 20 under Schedule 2 in the **Draft Development Consent Order [EN010154/APP/3.1]**
Paragraph 5.8.15	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 channels, flood storage areas and other artificial features, together with the consequences of their failure and exceedance;	Section 1 **of Appendix 9-C: Flood Risk Assessment** of the ES **[EN010154/APP/6.3]** provides details as to the nature of the FRA. The compliance of the FRA with the relevant policy is further demonstrated in Section 2 of **Appendix 9-C: Flood Risk Assessment** of the ES **[EN010154/APP/6.3**]. As set out in Paragraph 2.2.5 of **Appendix 9-C: Flood Risk Assessment** of the ES **[EN010154/APP/6.3]**, the objectives of the FRA are in line with paragraph 5.8.15 and include the following: a. is proportionate to the risk and appropriate to the scale, nature and location of the project; b. considers the risk of flooding arising from the project in addition to the risk of flooding to the project; c. takes the impacts of climate change into account; d. has been undertaken by competent people; e. considers both the potential adverse and beneficial effects of flood risk management infrastructure;

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	• 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	f. considers the vulnerability of those using the site; g. Considers different types of flooding; h. Identifies mitigation to reduce the impacts of flooding using natural flood management techniques (SuDS); i. Considers the effects of a range of flooding events including extreme events; and j. Considers residual risk. **Appendix 9-D: Framework Surface Water Drainage Strategy** of the ES **[EN010154/APP/6.3]**, considers the existing ability for rainfall to soak into the ground and sets out the framework Surface Water Drainage Strategy for the Principal Site which aims to mimic the natural drainage conditions as far as possible, by using SuDS to manage surface water flows generated by the Proposed Development infrastructure. **Appendix 9-C: Flood Risk Assessment o**f the ES **[EN010154/APP/6.3]** sets out at Section 8 the mitigation proposed to reduce residual flood risk. This includes having the panels at a fixed height of 800mm above the ground and ensuring that there are no buildings location within the flood plain.

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	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 has been followed. v. Explain and justify why the types of SuDS217 and method of discharge have been selected and why they are considered appropriate. vi. Explain how sustainable drainage systems have been integrated with other aspects of the development such as open space or green	

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infrastructure, so as to ensure an efficient use of the site

vii. Describe the multifunctional benefits the sustainable drainage system will provide viii. 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;
- identify and secure opportunities to reduce the causes and impacts of flooding overall during the period of construction; and

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	• be supported by appropriate data and information, including historical information on previous events	
Paragraph 5.8.17	Development (including construction works) will need to account for any existing watercourses and flood and coastal erosion risk management structures or features, or any land likely to be needed for future structures or features so as to ensure: • • Access, clearances and sufficient land are retained to enable their maintenance, repair, operation, and replacement, as necessary • Their standard of protection is not reduced • •Their condition or structural integrity is not reduced	Watercourses and flood risk are considered in **Appendix 9-C: Flood Risk Assessment** of the ES **[EN010154/APP/6.3]** and **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1].** **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]** considers all impacts on the water environment including flood risk and existing watercourses. As set out in Section 4.3 of **Appendix 9-C: Flood Risk Assessment** of the ES **[EN010154/APP/6.3]**, there are existing flood defences along the River Witham and River Brant that are within the Principal Site. The Proposed Development will not impact on these flood defences. Details of flood risk are provided in **Appendix 9-C: Flood Risk Assessment** of the ES **[EN010154/APP/6.3].** Consideration of access and the condition of existing watercourses is considered as detailed in **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]** with the management of watercourses during development detailed in the **Framework CEMP [EN010154/APP/7.7], Framework DEMP [EN010154/APP/7.9], and Framework OEMP [EN010154/APP/7.8].** Further consideration to watercourses is demonstrated in Section 3.3 of **Chapter 3: The Proposed Development** of the ES

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		[EN010154/APP/6.1] and Chapter 4: Alternatives and Design Evolution of the ES **[EN010154/APP/6.1].** **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]** concludes that no risks are proposed to arise from coastal erosion risk management structures or features and therefore no management measures are required.
Paragraph 5.8.18	Applicants for projects which may be affected by, or may add to, flood risk should arrange pre-application discussions before the official pre-application stage of the NSIP process with the EA or NRW, and, where relevant, other bodies such as Lead Local Flood Authorities, Internal Drainage Boards, sewerage undertakers, navigation authorities, highways authorities and reservoir owners and operators.	During the Statutory Consultation and preparation of the ES, key stakeholders were consulted, with any comments made accounted for in **Appendix 9-C: Flood Risk Assessment** of the ES **[EN010154/APP/6.3]**. The key stakeholders included the Lead Local Flood Authority – (Lincolnshire County Council), the Environment Agency, the Upper Witham Internal Drainage Board, and the Trent Valley Internal Drainage Board. A table containing details of how the Applicant has addressed consultee's' comments in relation to flood risk is provided in Section 9.3 of **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]**.
Paragraph 5.8.19	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 Secretary of State to reach a decision on the application when it is submitted. The Secretary of State should advise applicants to undertake these steps where they appear necessary but have not yet been addressed.	
Paragraph 5.8.20	If the EA, NRW or another flood risk management authority has reasonable concerns about the proposal on flood risk grounds, the applicant should discuss these	

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	concerns with the EA or NRW and take all reasonable steps to agree ways in which the proposal might be amended, or additional information provided, which would satisfy the authority's concerns.	
Paragraph 5.8.21	The Sequential Test ensures that a sequential, risk-based approach is followed to steer new development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account. Where it is not possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites with medium risk areas and then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas	**Appendix 9-C: Flood Risk Assessment** of the ES **[EN010154/APP/6.3]** contains details as to the compliance of the Proposed Development with the Sequential Test. The role of the Sequential Test in the site selection process is further detailed in Section 3 of **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]**.
Paragraph 5.8.23	Consideration of alternative sites should take account of the policy on alternatives set out in Section 4.3 above. All projects should apply the Sequential Test to locating development within the site	**Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]** sets out the approach to assessing the suitability of the site for the Proposed Development and potential alternative sites against a range of planning, environmental and operational criteria for generating stations with capacity of more than 50MW. The site selection process for the consideration of potential alternative sites was undertaken in five stages. Following identification of an area of search (Stage 1), all planning and environmental constraints including areas at risk of flooding (Flood Zones 2 and 3) were excluded in order to seek to identify a site with no constraints (Stage 2). Following identification of

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		potential sites with all constraints excluded (Stage 3) and their evaluation (Stage 4), it was concluded that the search needed to be widened as it was not possible to identify an appropriate site within the parameters defined for Stages 1 to 4 (Stage 5). Alongside other criteria, land within Flood Zones 2 and 3 was reintroduced back into the area of search. With constraints reintroduced, **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]** concludes that the location of the Proposed Development comprises the preferred site when compared with other potential alternative sites when taking into account planning and environmental constraints and operational considerations. Given the efforts made to identify a suitable site in initial consideration of areas at low risk of flooding and then higher risk areas, it has been demonstrated that the sequential test has been applied and satisfied as part of site selection.
Paragraph 5.8.24	To satisfactorily manage flood risk, arrangements are required to manage surface water and the impact of the natural water cycle on people and property.	Sections 9.7 and 9.9 of **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]** identifies the potential impacts and effects of all stages of development on surface water features, water quality, flood risk, drainage, and potential effects on hydrogeology. Where appropriate, arrangements are made to mitigate and manage the risks. The chapter concludes that following the implementation of standard and

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		embedded mitigation as detailed in Section 9.6, there are no likely significant effects resulting from any stage of the Proposed Development. Further consideration of maintenance activities such as panel cleaning is given, with no likely significant effects identified. Specific details on the consideration of surface water are provided in **Appendix 9-D: Surface Water Drainage Strategy** of the ES **[EN010154/APP/6.3]**. The consideration of people is detailed within **Appendix 9-C: Flood Risk Assessment** of the ES **[EN010154/APP/6.3]**.
Paragraph 5.8.25	In this NPS, the term SuDS refers to the whole range of sustainable approaches to surface water drainage management including, where appropriate: a. source control measures including rainwater recycling and drainage b. infiltration devices to allow water to soak into the ground, that can include individual soakaways and communal facilities c. filter strips and swales, which are vegetated features that hold and drain water downhill mimicking natural drainage patterns d. filter drains and porous pavements to allow rainwater and run-off to infiltrate into permeable	Section 4 of **Appendix 9-D: Framework Surface Water Drainage** of the ES **[EN010154/APP/6.3]**, provides the details of the surface water drainage strategy. The strategy adopts the use of Sustainable Drainage Systems (SuDS) as far as possible to manage surface water flows generated by the Proposed Development infrastructure. Runoff, discharge routes, and exceedance flows are detailed within **Appendix 9-D: Framework Surface Water Drainage** of the ES **[EN010154/APP/6.3]** to ensure severe rainfall flooding is considered.

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	material below ground and provide storage if needed e. basins, ponds and tanks to hold excess water after rain and allow controlled discharge that avoids flooding f. flood routes to carry and direct excess water through developments to minimise the impact of severe rainfall flooding	
Paragraph 5.8.26	Site layout and surface water drainage systems should cope with events that exceed the design capacity of the system, so that excess water can be safely stored on or conveyed from the site without adverse impacts	**Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]** assesses flood risk and drainage in the context of EIA. Section 4 of **Appendix 9-D: Framework Surface Water Drainage Strategy** of the ES **[EN010154/APP/6.3]** contains the surface water drainage strategy, including consideration of exceedance flows. Accordingly, the surface water drainage network has been designed to accommodate runoff from all storms up to and including the 100 year + 40% climate change event.
Paragraph 5.8.27	The surface water drainage arrangements for any project should, accounting for the predicted impacts of climate change throughout the development's lifetime, 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 5.8.28	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	The provision of surface water storage is detailed in Section 9.6 of **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]** as part of the embedded mitigation measures. Section 9.6 of the chapter

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	appropriate for infiltration facilities or attenuation storage to be provided outside the project site, if necessary, through the use of a planning obligation.	proposes the use of swales to drain surface water from proposed impermeable areas. The water will be discharge following a hierarchy with infiltration as the priority. The rate of discharge will be maintained at existing greenfield runoff rates by restricting rates using a flow control. Further details of the surface water storage are provided in **Appendix 9-D: Framework Surface Water Drainage Strategy** of the ES **[EN010154/APP/6.3].**
Paragraph 5.8.29	The sequential approach should be applied to the layout and design of the project. Vulnerable aspects of the development should be located on parts of the site at lower risk 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	Section 6 of the **Planning Statement [EN010154/APP/7.2]** demonstrates that where possible, all major infrastructure associated with the Proposed Development is situated outside of Flood Zones 2 and 3 in line with the sequential approach. The Proposed Development will include habitat creation and enhancement as set out in **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** and detailed in the **Framework LEMP [EN010154/APP/7.15]**. Section 4 of **Appendix 9-D: Framework Surface Water Drainage** of the ES **[EN010154/APP/6.3]**, provides the details of the surface water drainage strategy. The strategy adopts the use of SuDS as far as possible to manage surface water flows generated by the Proposed Development infrastructure.

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Paragraph 5.8.30	Where a development may result in an increase in flood risk elsewhere through the loss of flood storage, on-site level-for-level compensatory storage, accounting for the predicted impacts of climate change over the lifetime of the development, should be provided.	**Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]** assesses the potential impacts of the Proposed Development on flood risk through an impacts assessment. The assessment considers the predicted impacts of climate change. Measures to prevent an increase in flood risk resulting from the Proposed Development are detailed in the **Framework CEMP [EN010154/APP/7.7], Framework OEMP [EN010154/APP/7.8],** and **Framework DEMP [EN010154/APP/7.9].** Flood Risk will not increase as a result of the Proposed Development, within the DCO Site or elsewhere, with the proposed embedded mitigation in place, and therefore no compensatory storage is required. Overall **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]** concludes, following the implementation of standard and embedded mitigation as outlined in Section 9.6 of the chapter, there are no likely significant effects resulting from any of the stages of development of the Proposed Development. It adds that provided that all the mitigation measures are implemented for all Cumulative Schemes, then the cumulative impacts from the Proposed Development and any cumulative developments would not be anticipated to produce any significant effects during operation.
Paragraph 5.8.31	Where it is not possible to provide compensatory storage on site, it may be acceptable to provide it off-site if it is hydraulically and hydrologically linked. Where development may cause the deflection or constriction of flood flow routes, these will need to be safely managed within the site.	
Paragraph 5.8.32	Where development may contribute to a cumulative increase in flood risk elsewhere, the provision of multifunctional sustainable drainage systems, natural flood management and green infrastructure can also make a valuable contribution to mitigating this risk whilst providing wider benefits.	

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Paragraph 5.8.33	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.	Flood warning and evacuation plans are referred to in Section 9.6 of **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]**. The chapter confirms an Emergency Response Plan (ERP) will be in place as set out within Section 2.12 of the **Framework CEMP [EN010154/APP/7.7]** and secured via Requirement 12 under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. Section 2.12 of **The Framework CEMP [EN010154/APP/7.7]** provides that the ERP will be developed in consultation with the relevant local authority emergency planning officer, emergency services and Environment Agency in relation to responding to flood warnings and events.
Paragraph 5.8.34	The applicant should take advice from the local authority emergency planning team, emergency services and, where appropriate, from the local resilience forum 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.	
Paragraph 5.8.35	Flood resistant and resilient materials and design should be adopted to minimise damage and speed recovery in the event of a flood.	The Proposed Development has been designed to be resilient to flood risk, with further detail included in Section 5.5 of the **Design Approach Document [EN010154/APP/7.3]**. The Proposed Development has been designed with flood resilience in mind and in accordance with Design Principle 6 set out in the **Design Approach Document [EN010154/APP/7.3],** which seeks to ensure that "*The Proposed Development will be designed to be resilient to flood risk now and in the future, with close engagement with the Environment Agency."* The location of solar infrastructure in accordance with Design Principle 6 will be secured via the Design

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		Commitments set out in the **Design Approach Document [EN010154/APP/7.3**], which are themselves secured by Requirement 6 at Schedule 2 to the **Draft Development Consent Order [EN010154/APP/3.1],** which state: a. No solar stations or other major electrical infrastructure to be located in Flood Zone 2 or 3. b. No above ground solar development within Flood Zone 3.
Paragraph 5.8.36	In determining an application for development consent, the Secretary of State should be satisfied that where relevant: • the application is supported by an appropriate FRA • the Sequential Test has been applied and satisfied 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 • the proposal is in line with any relevant national and local flood risk management strategy	An FRA is provided in **Appendix 9-C: Flood Risk Assessment** of the ES **[EN010154/APP/6.3]**. The Sequential Test has been applied and utilised as part of the site selection process as mentioned in Section 6 of the **Planning Statement [EN010154/APP/7.2]** and the **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]**. Section 4 of **Appendix 9-C: Flood Risk Assessment** of the ES **[EN010154/APP/6.3]** notes how the location of the key components of the Proposed Development accords with a sequential approach in relation to flood risk. **Appendix 9-C: Flood Risk Assessment** of the ES **[EN010154/APP/6.3]** and Section 9.8 of **Chapter 9:**

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	• SuDS (as required in the next paragraph on National Standards) have been used unless there is clear evidence that their use would be inappropriate • 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 paragraph 5.8.42) • the project includes safe access and escape routes where required, as part of an agreed emergency plan, and that any residual risk can be safely managed over the lifetime of the development • land that is likely to be needed for present or future flood risk management infrastructure has been appropriately safeguarded from development to the extent that development would not prevent or hinder its construction, operation or maintenance.	**Water Environment** of the ES **[EN010154/APP/6.1]** demonstrates flood risk, from all sources, will not increase as a result of the Proposed Development, within the DCO Site or elsewhere, with the proposed embedded mitigation in place. The **Framework CEMP [EN010154/APP/7.7]** contains details of an Emergency Response Plan at Section 3.5 that will be produced as part of the detailed CEMP which is secured under Requirement 12 at Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1].** Sections 9.6 and 9.8 of **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]** presents the mitigations and measures taken to ensure that present and future flood risk is managed.
Paragraph 5.8.38	In addition, the Development Consent Order, or any associated planning obligations, will need to make provision for appropriate operation and maintenance of any SuDS throughout the project's lifetime. Where this is secured through the adoption of any SuDS features, any necessary access rights to property will need to be granted.	**Appendix 9-D: Framework Surface Water Drainage Strategy** of the ES **[EN010154/APP/6.3]** details the adoption and use of SuDS, where possible, throughout the lifetime of the Proposed Development. The strategy confirms that SuDS features will not be on publicly accessible land. Surface water runoff during the construction of the Proposed Development is to be managed by the onsite contractors through the Construction Environment Management Plan. A **Framework CEMP** is submitted with the DCO
Paragraph 5.8.39	Where relevant, the Secretary of State should be satisfied that the most appropriate body is being given the	

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	responsibility for maintaining any SuDS, taking into account the nature and security of the infrastructure on the proposed site. Responsible bodies could include, for example the landowner, the relevant lead local flood authority or water and sewerage company (through the Ofwat-approved Sewerage Sector Guidance), or another body, such as an Internal Drainage Board.	application **[EN010154/APP/7.7]**. Surface Water during the operational phase of the Proposed Development is to be managed by the Operator, as set out in the **Framework OEMP [EN010154/APP/7.8]** and no access rights will need to be granted. A detailed Surface Water Drainage Strategy will be secured by a Requirement 10 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1].**
Paragraph 5.8.41	Energy projects should not normally be consented within Flood Zone 3b, or Zone C2 in Wales, or on land expected to fall within these zones within its predicted lifetime. This may also apply where land is subject to other sources of flooding (for example surface water). However, where essential energy infrastructure has to be located in such areas, for operational reasons, they should only be consented if the development will not result in a net loss of floodplain storage, and will not impede water flows.	**The Statement of Need [EN010154/APP/7.1]** demonstrates the need for the Proposed Development as a development considered of CNP. As set out in **Appendix 9-C: Flood Risk Assessment** of the **ES [EN010154/APP/6.3]** the vast majority of the Principal Site lies within Flood Zone 1. Small areas of Flood Zone 2 and 3 associated with main rivers are present in areas near the boundary of the Principal Site, including the Witham Washlands Flood Storage Area. The Principal Site also has flood plain associated with ordinary watercourses (Mill Dam Dyke) and along field boundaries. Areas where the extents of Flood Zone 2 overlap with solar PV Panels in the Principal Site have been identified within **Appendix 9-C: Flood Risk Assessment** of the ES **[EN010154/APP/6.3]**and are referred to as “interaction zones”. No other permanent built development is located within Flood Zone 2 or 3.

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		Small sections of the Cable Corridor lie within Flood Zone 2 and 3 extents, including the Witham Washlands Flood Storage Area; however, the cable route will not involve permanent above ground, built development during the operational phase of the Proposed Development within these areas.
Paragraph 5.8.42	Exceptionally, where an increase in flood risk elsewhere cannot be avoided or wholly mitigated, the Secretary of State may grant consent if they are satisfied that the increase in present and future flood risk can be mitigated to an acceptable and safe level and taking account of the benefits of, including the need for, nationally significant energy infrastructure as set out in Part 3 above. In any such case the Secretary of State should make clear how, in reaching their decision, they have weighed up the increased flood risk against the benefits of the project, taking account of the nature and degree of the risk, the future impacts on climate change, and advice provided by the EA or NRW and other relevant bodies.	A **Flood Risk Assessment** (**Appendix 9-C** of the ES **[EN010154/APP/6.3]**) has been prepared in accordance with the requirements of paragraphs Section 5.8 of EN-1. The likely effects of the Proposed Development associated with flood risk have been assessed in **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]**. The FRA demonstrates flood risk, from all sources, will not increase as a result of the Proposed Development, within the DCO Site or elsewhere, with the proposed embedded mitigation in place.
Historic Environment		
Paragraph 5.9.7	The Secretary of State should also consider the impacts on other non-designated heritage assets (as identified either through the development plan making process by plan-making bodies, including 'local listing', or through the application, examination and decision making process). This is on the basis of clear evidence that such	An assessment of potential impacts resulting from the Proposed Development on the historic environment for each phase of development is included within Section 7.7 of **Chapter 7: Cultural Heritage** of the ES

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	heritage assets have a significance that merits consideration in that process, even though those assets are of lesser significance than designated heritage assets.	**[EN010154/APP/6.1]**. The assessment considers both designated and non-designated assets.
Paragraph 5.9.9	The applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA, and describe these along with how the mitigation hierarchy has been applied in the ES (see Section 4.32). This should include consideration of heritage assets above, at, and below the surface of the ground. Consideration will also need to be given to the possible impacts, including cumulative, on the wider historic environment. The assessment should include reference to any historic landscape or seascape character assessment and associated studies as a means of assessing impacts relevant to the proposed project.	**Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]** includes a clear and detailed assessment of the likely impacts and effects of the Proposed Development on heritage assets, both above and below ground, and their setting. Within the chapter, both heritage assets and the historic landscape are considered. Sections 7.6 and 7.8 of the chapter provide further detail on embedded mitigation measures and additional mitigation and enhancement respectively. Historic England have been consulted on the Proposed Development prior to submission.
Paragraph 5.9.10	As part of the ES the applicant should provide a description of the significance of the heritage assets affected by the proposed development, including any contribution made by their setting. 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 their significance. As a minimum, the applicant should have consulted the relevant Historic Environment Record (or, where the development is in English or Welsh waters, Historic	The settings of designated heritage assets of the highest value (i.e. World Heritage Sites, Scheduled Monuments, Grade I and II* Listed Buildings, Grade I and II* Registered Parks and Gardens and Conservation Areas (containing assets of the highest value)) have been considered up to 5km from the Principal Site. This is due to the Proposed Development having the potential to result in long-term change to the settings of the highest value designated heritage assets, some of which may be located at distance from the Principal Site.

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	England or Cadw) and assessed the heritage assets themselves using expertise where necessary according to the proposed development's impact.	Following the assessment, it is acknowledged that there would be some assets adversely affected by the Proposed Development (Grade II Listed River Farmhouse and Grange Cottage, as well as the non-designated Tonge's Farm). A detailed analysis of planning policy is provided in the historic environment paragraphs of Section 6 of the **Planning Statement [EN010154/APP/7.2]**.
Paragraph 5.9.11	Where a site on which development is proposed 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, accurate representative visualisations may be necessary to explain the impact.	**Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]** notes the mitigation strategy developed through the ES was informed by the results of desk-based assessments and field surveys. **Table 4-2** in **Chapter 4: Alternatives and Design Evolution** of the ES **[EN010154/APP/6.1]** details the use of a desktop study which included the consideration of heritage factors in informing both the Principal Site and Cable Corridor location for the PEI Report. **Appendix 7-B: Cultural Heritage Desk-Based Assessment [EN010154/APP/6.3]** identifies all known designated and non-designated terrestrial heritage assets located within the DCO Site and the defined study areas. It assesses the potential for the survival of previously unknown heritage assets and archaeological remains and provides an assessment of the significance of the known heritage assets and potential archaeological remains that have the potential to be affected by the Proposed Development. It concludes

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		with an assessment of potentially affected heritage assets within the Site and study area. Trial trenching has also been undertaken across the Principal Site, the interim results of which can be found in **Appendix 7-I: Trial Trenching Report (Interim)** of the ES **[EN010154/APP/6.3]**.
Paragraph 5.9.12	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 extent and detail of these studies will be proportionate to the significance of the heritage asset affected.	**Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]** provides an assessment of the phases of development of the Proposed Development on heritage assets. Section 7.7 of **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]** concludes that following the implementation of the embedded and additional mitigation measures, it is considered that in the worst-case scenario, the residual effect on buried archaeological remains would be a minor adverse effect (not significant). The suite of mitigation options available during the detailed design phase will allow for this already non-significant adverse effect to be further reduced or potentially avoided completely. The mitigation measures built into the Proposed Development minimise the changes to surrounding designated and built heritage assets and the historic landscape resource. No additional mitigation is proposed, and the effects have been assessed, in the worst-case scenario, as minor or negligible adverse (not

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		significant) and thus the residual effect remains as such (not significant). Further details regarding measures taken to minimise effects are provided in the **Framework CTMP [EN010154/APP/7.18]**, **Framework CEMP [EN010154/APP/7.7]**, **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]**, **Framework OEMP [EN010154/APP/7.8]**, **Framework DEMP [EN010154/APP/7.9]**, and **Framework LEMP [EN010154/APP/7.15]**.
Paragraph 5.9.13	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: • enhancing, through a range of measures such a sensitive design, the significance of heritage assets or setting affected • considering where required the development of archive capacity which could deliver significant public benefits • considering how visual or noise impacts can affect heritage assets, and whether there may be opportunities to enhance access to, or interpretation, understanding	Design Principle 5 in Section 3.9 of the **Design Approach Document [EN010154/APP/7.3]** states "*The Proposed Development will be sensitive to heritage assets, providing suitable offsets, and including protecting views to Lincolnshire Cathedral."* The measures incorporated into the Proposed Development relevant to designated heritage assets and the historic environment comprise: a. The appropriate siting of Solar PV Panels and offsets/buffers, to maintain a degree of separation between the Proposed Development and surrounding heritage assets in order to avoid or minimise potential changes to the setting of designated heritage assets which could affect their value (heritage significance). This includes Grade I, Grade II* and Grade II Listed Buildings,

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	and appreciation of, the heritage assets affected by the scheme	Scheduled Monuments, Conservation Areas and non-designated assets located in the surroundings of the DCO Site (including in Morton, Thorpe on the Hill, Haddington, Thurlby, Bassingham); The removal of all above ground infrastructure to create a set back from the Grade II Listed River Farmhouse (NHLE 1168186), including additional planting of new hedges around the Solar PV Areas; b. The retention of existing hedgerows and woodland wherever possible and new planting (including new hedgerows, trees and tree belts), to provide screening of Solar PV Panels and other infrastructure (such as BESS and Substation in relation to assets in Haddington and Aubourn); and c. The exclusion of development to maintain a view corridor to and from Lincoln Cathedral on land north of the A46 and the placement of the Solar PV Panels and associated infrastructure to preserve views towards the Cathedral from Tunman Hill. The above mitigation is secured through Design Commitments (set out in the **Design Approach Document [EN010154/APP/7.3])** which are secured under Requirement 6 as detailed in Schedule 2 of the

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		Draft Development Consent Order [EN010154/APP/3.1]. Any impacts upon the designated heritage assets during construction and decommissioning would be temporary and would not lead to significant effects. However, for the avoidance of doubt, mitigation measures relevant to impacts such as traffic, noise and dust during construction and decommissioning are addressed within the **Framework CEMP [EN010154/APP/7.7]**, **Framework CTMP [EN010154/APP/7.18]** and **Framework DEMP [EN010154/APP/7.9]**. These incorporate measures to ensure any effects on designated historic assets are avoided or minimised.
Paragraph 5.9.14	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	**Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]** assesses the likely impacts of the Proposed Development on cultural heritage, and the majority of effects are of a long term but, reversible nature.
Paragraph 5.9.15	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.	There are no World Heritage Sites affected by the Proposed Development. Section 7.6 of **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]** notes the baseline conditions and concludes that there are three conservation areas within the study area**. Section 7.8 of Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]** assesses the

Policy paragraph	Policy description	Compliance commentary
		likely impacts of the Proposed Development on these conservation areas and concludes that following decommissioning the landscape would likely be returned to its original use indicating that no permanent harm to the conservation area would result from the Proposed Development. During operation, it has been assessed through a detailed settings assessment that the proposed change within the settings of the conservation areas as a result of the Proposed Development would not affect their value (heritage significance), due to lack of relevant associations, intervisibility or as a result of the embedded mitigation measures.
Paragraph 5.9.24	In considering the impact of a proposed development on any heritage assets, the Secretary of State should consider 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 their conservation and any aspect of the proposal.	The particular nature of the significance of the heritage assets and the value they hold is set out in Section 7.5 of **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]**. **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]** provides details on how the impacts from the Proposed Development on designated heritage assets have been mitigated and managed. The chapter demonstrates that, following the implementation of mitigation measures, there are no significant effects on designated heritage assets.
Paragraph 5.9.27	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	

Policy paragraph	Policy description	Compliance commentary
	potential harm amounts to substantial harm, total loss, or less than substantial harm to its significance.	
Paragraph 5.9.28	The Secretary of State should give considerable importance and weight to the desirability of preserving all heritage assets. 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.	**Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]** concludes that there will be no residual significant effects on any designated or other heritage assets as result of the Proposed Development. Where there are effects, the justification for this, as provided in the **Planning Statement [EN010154/APP/7.2]**, is that electricity generation is identified as being of CNP and is urgently needed to help meet the Government's energy objectives.
Paragraph 5.9.29	Substantial harm to or loss of significance of a grade II Listed Building or a grade II Registered Park or Garden should be exceptional.	There is no substantial harm anticipated to any listed buildings, parks or gardens or scheduled monuments as detailed in Section 7.7 of **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]**.
Paragraph 5.9.30	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	
Paragraph 5.9.31	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	Section 7.10 of **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]** concludes there will be no residual significant effects on any designated heritage assets or their setting as a result of the Proposed Development. Embedded mitigation measures have

Policy paragraph	Policy description	Compliance commentary
	to achieve substantial public benefits that outweigh that harm or loss, or all the following apply: • the nature of the heritage asset prevents all reasonable uses of the site • no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation • conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible • the harm or loss is outweighed by the benefit of bringing the site back into use	reduced any significant adverse effects on heritage assets. There is no substantial harm to any heritage assets as a result of the Proposed Development, However, Section 7.7 in **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]** concludes less than substantial harm on the lower end of the scale for two designated (River Farmhouse and Grange Cottage) and one non designated asset (Tonge's Farm). This status is concluded to be reversible in both instances. Section 6.3 of the **Planning Statement [EN010154/APP/7.2]** concludes that the substantial benefits of the Proposed Development outweigh the less than substantial harm to the two designated and one non-designated heritage assets.
Paragraph 5.9.32	Where the proposed development will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate securing its optimum viable use.	Section 7.7 of **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]** concludes less than substantial harm on the lower end of the scale for two designated and one non designated asset. This status is concluded to be reversible in both instances. The **Statement of Need [EN010154/APP/7.1]** and **Planning Statement [EN010154/APP/7.2]** presents rationale on the need and benefits of the Proposed Development respectively. **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]** concludes that there will be no residual significant effect on any non-designated heritage assets as result of the Proposed Development.
Paragraph 5.9.33	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	

Policy paragraph	Policy description	Compliance commentary
		The impact of the Proposed Development on non-heritage assets is assessed in Section 7.7 of the chapter. A full analysis of this is provided in Section 6 and 7 of the **Planning Statement [EN010154/APP/7.2]**.
Paragraph 5.9.34	Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 5.9.30 or less than substantial harm under paragraph 5.9.32 as appropriate, considering the relative significance of the element affected and its contribution to the significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.	There are no World Heritage Sites to be affected by the Proposed Development. As described in Sections 7.7 and 7.9 of **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]**, no effects are anticipated on any conservation areas, including Bassingham conservation area (detailed in Section 7 of the chapter).
Paragraph 5.9.36	When considering applications for development affecting the setting of a designated heritage asset, the Secretary of State should give appropriate weight to the desirability of preserving the setting such assets and 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 Secretary of State should give great weight to any negative effects, when weighing them	The significance of heritage assets, contribution made by their setting, and assessment of impacts from the Proposed Development are discussed in **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]** with detail provided within **Appendix 7-D: Detailed Heritage Asset Setting Assessment** of the ES **[EN010154/APP/6.3]** at **Section 4.** **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]** and Section 4 of **Appendix 7-D:**

Policy paragraph	Policy description	Compliance commentary
	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.	**Detailed Heritage Asset Setting Assessment** of the ES **[EN010154/APP/6.3]** conclude that there would be no adverse effects to designated heritage assets and their settings. The Proposed Development will lead to less than substantial harm (at the lower end of the scale) to the significance of two designated heritage assets and one non-designated asset as described above. However, it has been demonstrated within the **Planning Statement [EN010154/APP/7.2]** that the substantial benefits of the Proposed Development outweigh the harm to these assets.
Landscape and Visual		
Paragraph 5.10.1	The landscape and visual effects of energy projects will vary on a case by case basis according to the type of development, its location and the landscape setting of the proposed development. In this context, references to landscape should be taken as covering seascape and townscape where appropriate.	**Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** presents the findings of the assessment of the likely significant effects of the Proposed Development on the landscape character and visual amenity.
Paragraph 5.10.4	Landscape effects arise not only from the sensitivity of the landscape but also the nature and magnitude of change proposed by the development, whose specific siting and design make the assessment a case-by-case judgement.	**Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** assesses the magnitude of impact and significance of effect for construction, key phases of operation, and decommissioning of the Proposed Development. The assessment methodology is detailed in Section 10.4 of the Chapter.

Policy paragraph	Policy description	Compliance commentary
Paragraph 5.10.5	Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation.	Consideration of the landscape was a key driver in the design of the Proposed Development, Design Principle 1 states "T*he Proposed Development will be sensitively integrated into its landscape setting, to minimise adverse landscape and visual effects as far as possible*", as set out in Section 3.9 of the **Design Approach Document [EN010154/APP/7.3]**. This details the iterative approach taken to minimise harm to the landscape through the appropriate siting and layout of infrastructure, design, and development of the **Framework LEMP [EN010154/APP/7.15]**. **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** has identified the landscape receptors and assessed the potential impacts of the Proposed Development on them. Where impacts have been identified, embedded mitigation measures and additional mitigation, and enhancement measures have been implemented to minimise the impacts as much as possible. The results of the assessment have been used to inform the design process. **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]** and the **Framework LEMP [EN010154/APP/7.15]** provide further details as to the landscape measures embedded into the design of the Proposed Development to minimise harm.

Policy paragraph	Policy description	Compliance commentary
		A full assessment of policy compliance on landscape and visual amenity is provided in Section 6 of the **Planning Statement [EN010154/APP/7.2].**
Paragraph 5.10.6	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.	Consideration of the landscape was a key driver in the Proposed Development's design which included being part of the Design Principles, set out in the **Design Approach Document [EN010154/APP/7.3]**. This details the iterative approach taken to minimise harm to the landscape through the appropriate siting and layout of infrastructure, design, and development of the **Framework LEMP [EN010154/APP/7.15]**. **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** has identified the landscape receptors and assessed the potential impacts of the Proposed Development on them. Where impacts have been identified embedded mitigation measures and additional mitigation, and enhancement measures have been implemented to minimise the impacts as much as possible. The results of the assessment have been used to inform the design process. **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]** and the **Framework LEMP [EN010154/APP/7.15]** provide further details as to the landscape measures embedded into the design of the Proposed Development to minimise harm.

Policy paragraph	Policy description	Compliance commentary
		A full assessment of policy compliance on landscape and visual amenity is provided in Section 6 of the Planning Statement.
Paragraph 5.10.7	National Parks, the Broads and AONBs have been confirmed by the government as having the highest status of protection in relation to landscape and natural beauty. Each of these designated areas has specific statutory purposes. Projects should be designed sensitively given the various siting, operational, and other relevant constraints. For development proposals located within designated landscapes the Secretary of State should be satisfied that measures which seek to further purposes of the designation are sufficient, appropriate and proportionate to the type and scale of the development.	The Proposed Development is not located within a National Park, the Broads or a National Landscape (previously known as an AONB).
Paragraph 5.10.8	The duty to seek to further the purposes of nationally designated landscapes also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. In these locations, projects should be designed sensitively given the various siting, operational, and other relevant constraints. The Secretary of State should be satisfied that measures which seek to further the purposes of the designation are sufficient, appropriate and proportionate to the type and scale of the development.	

Policy paragraph	Policy description	Compliance commentary
Paragraph 5.10.12	Outside nationally designated areas, there are local landscapes that may be highly valued locally. Where a local development document in England or a local development plan in Wales has policies based on landscape or waterscape character assessment, these should be paid particular attention. However, locally valued landscapes should not be used in themselves to refuse consent, as this may unduly restrict acceptable development.	**Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** considers local landscapes within its assessment. A Local Landscape Character Assessment has been undertaken as part of the chapter in accordance with industry guidelines. **Appendix 10-C: Landscape Baseline** of the ES **[EN010154/APP/6.3]** details consideration of valued local landscape areas. An Area of Great Landscape Value as allocated in the Central Lincolnshire Local Plan has been avoided except for underground cabling in the Cable Corridor.
Paragraph 5.10.13	All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites.	**Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** provides a Landscape and Visual Impacts Assessment. A Zone of Theoretical Visibility was used to help identify sensitive visual receptor groups within the assessment. Where impacts were identified on identified visual receptors, mitigation measures and embedded mitigation and enhancements are implemented. The Proposed Development would result in 17 significant adverse landscape and visual effects at construction, operation and decommissioning. While these are temporary and reversible on decommissioning, it is noted that 5 residual significant effects would be experienced during operation after year 15 of the Proposed Development. However, landscape and visual effects have been minimised and would reduce over time as mitigation planting matures.
Paragraph 5.10.14	The Secretary of State 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.	

Policy paragraph	Policy description	Compliance commentary
		Some non-significant effects are identified on certain receptors however the need for the Proposed Development is justified in both the **Statement of Need [EN010154/APP/7.1]** and Sections 5, 6, 7, and 8 of the **Planning Statement [EN010154/APP/7.2]**. Additionally, the **Design Approach Document [EN010154/APP/7.3]** demonstrates how the Proposed Development has been designed to minimise any impacts on sensitive receptors.
Paragraph 5.10.16	The applicant should carry out a landscape and visual impact assessment and report it in the ES, including cumulative effects (see Section 4.3). Several guides have been produced to assist in addressing landscape issues.	A Landscape and Visual Impact Assessment has been undertaken and included within **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** which includes cumulative effects in Section 10.10 of the chapter. This includes references to local and national landscape character assessments and associated studies as a means of assessing landscape impacts. Section 10.5 of **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** sets out the baseline conditions including Published Landscape Character Assessments, which have been taken into account in the assessment.
Paragraph 5.10.17	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.	
Paragraph 5.10.19	The applicant should consider landscape and visual matters in the early stages of siting and design, where site choices and design principles are being established. This will allow the applicant to demonstrate in the ES how	**Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** contains an assessment of landscape and visual impacts which has been used to inform the development of Design Principles within

Policy paragraph	Policy description	Compliance commentary
	negative effects have been minimised and opportunities for creating positive benefits or enhancement have been recognised incorporated into the design, delivery, and operation of the scheme.	Section 3.9 of the **Design Approach Document [EN010154/APP/7.3]** which underpins the evolution of design from the early stages. Section 10.6 of **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** details how landscape and visual impacts have been considered within the iterative design process and outlines the landscape strategy and embedded mitigations. Additional mitigation and enhancement is detailed in Section 10.8 and full details on the design rationale and intent are set out in **Chapter 4: Alternatives and Design Evolution** of the ES **[EN010154/APP/6.1]**. The **Planning Statement [EN010154/APP/7.2]** further discusses the benefits and consideration of landscape and visual impacts with reference to the **Framework LEMP [EN010154/APP/7.15]**, which sets out parameters for delivering the indicative landscape and ecological enhancements.
Paragraph 5.10.20	The assessment should include the effects on landscape components and character during construction and operation. For projects which may affect a National Park, The Broads or an Areas of Outstanding Natural Beauty the assessment should include effects on the natural beauty and special qualities of these areas'	The effects on landscape components and character during the construction and operation phases of the Proposed Development are assessed in Section 10.7 of **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1].** The Proposed Development is not located within, and will not affect, a National Park, the Broads or an AONB (now known as National Landscapes).

Policy paragraph	Policy description	Compliance commentary
Paragraph 5.10.21	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 dark skies, local amenity, and nature conservation.	This is assessed for each phase of the Proposed Development in Section 10.7 – Assessment of Effects of **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1].** Lighting is considered for both the Principal Site and Cable Corridor in Section 10.5 of **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]**.
Paragraph 5.10.22	The assessment should also address the landscape and visual effects of noise and light pollution, and other emissions (see Section 5.2 and Section 5.7), from construction and operational activities on residential amenity and on sensitive locations, receptors and views, how these will be minimised.	**Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** assesses landscape and visual effects, which includes consideration of noise and light pollution as well as other emissions from construction and operational activities. Section 10.10 of the chapter assesses the cumulative schemes where the spatial extent of the schemes change the landscape character of a district area; or where perceptual qualities are affected by elements such as construction at a more intensive level and/or across a more extensive area. Any impacts identified are minimised through the use of mitigation measures detailed within Section 10.6 and 10.8 of **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]**. These measures include provision for the successful establishment and future management of biodiversity, habitat creation, and landscaping works. It sets out the short and long-term measures and practices that will be implemented to establish, monitor, and manage landscape and ecology

Policy paragraph	Policy description	Compliance commentary
		mitigation and enhancement (BNG) measures embedded in the design. Additionally, a **Framework LEMP [EN010154/APP/7.15]** has been produced to ensure the implementation of landscape measures which is secured under Requirement 8 in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 5.10.24	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.	A **Framework LEMP [EN010154/APP/7.15]** has been produced which sets out measures and prescriptions for: a. Mitigation against the effects of the Proposed Development on the landscape, and biodiversity features; b. The enhancement of biodiversity, landscape value within the DCO Site boundary; c. Securing compliance with relevant national and local planning policies; and d. Habitat creation and management with the aim of providing significant ecological enhancements while strengthening green infrastructure within the area. It outlines the landscape and biodiversity impact avoidance measures that will be implemented prior to and during construction of the Proposed Development,

Policy paragraph	Policy description	Compliance commentary
		as well as the habitat restoration, enhancement, management, and monitoring measures to be implemented once the Proposed Development is operational. The **Framework LEMP [EN010154/APP/7.15]** will be secured in detail by Requirement 8 under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**
Paragraph 5.10.25	In considering visual effects it may be helpful for applicants to draw attention, in the supporting evidence to their applications, to any examples of existing permitted infrastructure they are aware of with a similar magnitude of impact on equally sensitive receptors. This may assist the Secretary of State in judging the weight they should give to the assessed visual impacts of the proposed development.	The Order Limits of the Proposed Development do not overlap with the boundaries of either the Springwell or Leoda projects, both nationally significant solar projects requiring consent under the PA 2008 (not consented at the time of writing) alongside the Proposed Development, however they do propose to connect into the proposed National Grid Substation near Navenby.
Paragraph 5.10.26	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, 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 Secretary of State may decide that	**Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]**, the size of the site needs to take into account the following: the land required for solar infrastructure (e.g. solar panels, battery storage etc), the extent of environmental mitigation land required given the known large numbers of ground nesting birds in Lincolnshire, the need to retain flexibility and ensure sufficient land for biodiversity enhancements, and accommodate landowner requests. Given these considerations, the

Policy paragraph	Policy description	Compliance commentary
	the benefits of the mitigation to reduce the landscape and/or visual effects outweigh the marginal loss of function.	scale of the Proposed Development is considered to the proportionate. Furthermore, the vital need for low carbon renewable energy is supported by the Proposed Development given its ability to contribute towards meeting the growing energy demand. Section 5 of the **Statement of Need [EN010154/APP/7.1]** details the benefits of solar power in meeting this need as a scalable technology capable of rapid deployment. Section 5.3 of the **Planning Statement [EN010154/APP/7.2]** further highlights the contribution the Proposed Development will make to low carbon renewable energy generation. **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** details the appropriate siting of the Proposed Development which includes locating the solar PV panels and associated infrastructure to minimise instances of development on both sides of a PRoW; and situating the Cable Corridor alongside existing pylons to avoid affecting new areas within the sensitive landscape area of Lincoln Cliff. **The Design Approach Document [EN010154/APP/7.3]** further details how the siting and layout of infrastructure formed a key part of the iterative design. These are detailed in Section 4.3.
Paragraph 5.10.27	Adverse landscape and visual effects may be minimised through appropriate siting of infrastructure within its	The **Design Approach Document [EN010154/APP/7.3]** details how the siting and layout

Policy paragraph	Policy description	Compliance commentary
	development site and wider setting. The careful consideration of colours and materials will support the delivery of a well-designed scheme, as will sympathetic landscaping and management of its immediate surroundings.	of infrastructure, formed a key part of the iterative design process. This document demonstrates the considerations which have informed the evolution of design for the Proposed Development in relation to landscape and visual impact which provided both constraints and opportunities for the Proposed Development as set out in Section 3.7. A detailed description of the Proposed Development and its components is set out in **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]**. Section 10.6 of **Chapter 10: Landscape and Visual Impact Assessment** of the ES **[EN010154/APP/6.1]** details the embedded mitigation measures incorporated into the Proposed Development, which include careful siting in the landscape, conserving existing vegetation patterns, creating new green infrastructure sensitive and careful lighting design and management measures (to provide management and maintenance in order to provide the intended effect). These measures will support the delivery of a well-designed scheme.
Paragraph 5.10.30	The Secretary of State should be satisfied that local authorities will have sufficient design content secured to ensure future consenting will meet landscape, visual and good design objectives.	There is sufficient design content secured to ensure future consenting will meet landscape, visual and good design objectives. Detailed Design approval is secured under Requirement 6 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**,

Policy paragraph	Policy description	Compliance commentary
		which sets out that no part of the authorised development may commence until details of— a. the layout; b. scale; c. proposed finished ground levels; d. external appearance; e. hard surfacing materials; f. drainage, water, electrical, power and communication cables and pipelines; g. vehicular and pedestrian access, parking and circulation areas, junction improvements and passing places; and h. refuse or other storage units, signs and lighting, have been approved by the local authorities. The details submitted above must accord with: a. the design commitments b. the proposed development parameters; and c. any details approved under other requirements in the DCO in relation to the

Policy paragraph	Policy description	Compliance commentary
		LEMP, fencing, surface and foul water and archaeology.
Paragraph 5.10.34	The duty to seek to further the purposes of nationally designated landscapes 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 harming the purposes of designation or to minimise adverse effects on designated landscapes, and such projects should be designated sensitively given the various siting, operational, and other relevant constraints. The fact that a proposed project will be visible from within a designated area should not in itself be a reason for the Secretary of State to refuse consent	No nationally designated landscapes will be impacted by the Proposed Development as set out in Section 10.5 of **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]**.
Paragraph 5.10.35	The scale of energy projects means that they will often be visible across a very wide area. The Secretary of State 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	**Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** provides an assessment of the landscape and visual impacts resulting from the Proposed Development. Any impacts identified are minimised through the implementation of embedded mitigation measures and additional mitigations and enhancements as detailed in Sections 10.6 and 10.8 of the chapter. The chapter concludes there will be residual significant effects, although these are primarily concentrated in the construction and decommissioning phases with effects reducing during the operational phase as the mitigation planting becomes established over time.

Policy paragraph	Policy description	Compliance commentary
		The overall need and benefit of the Proposed Development is established and justified within the **Statement of Need [EN010154/APP/7.1]** and Section 5 of the **Planning Statement [EN010154/APP/7.2]**.
Paragraph 5.10.36	In reaching a judgement, the Secretary of State 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 Secretary of State considers reasonable.	As a result of the mitigation measures implemented, as set out within Sections 10.6 and 10.8 of **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1],** all the residual significant are reduced to either short-term or temporary effects. Notably, as confirmed in Section 10.9 of **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** the number of significant effects to the landscape and visual receptors will reduce and drop by half, respectively, once the Proposed Development is operational. There are further reductions in significant effects for landscape receptors as mitigation planting is established in year 15. The mitigation measures are provided through the **Framework LEMP [EN010154/APP/7.15],** which sets out the measures and prescriptions for: a. Mitigation against the effects of the Proposed Development on the landscape, and biodiversity features; b. The enhancement of biodiversity, landscape value within the DCO Site boundary;

Policy paragraph	Policy description	Compliance commentary
		c. Securing compliance with relevant national and local planning policies; and d. Habitat creation and management with the aim of providing significant ecological enhancements while strengthening green infrastructure within the area A detailed LEMP with be provided and secured via Requirement 8 under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1].**
Paragraph 5.10.37	The Secretary of State 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 appropriate mitigation	Section 3.9 of the **Design Approach Document [EN010154/APP/7.3]** details the Design Principles which have underpinned the design evolution of the Proposed Development. Design Principles 1, 3, 4 and 8 relate to designing to minimise impacts to the landscape and visual amenity. Section 10.7 of **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** further demonstrates how the results of the Landscape and Visual Impacts Assessment have informed the embedded mitigation measures, and additional mitigations and enhancements to minimise impacts to the landscape and visual amenity. This is further supported through the **Framework LEMP [EN010154/APP/7.15]**, which sets out the measures and prescriptions for:

Policy paragraph	Policy description	Compliance commentary
		a. Mitigation against the effects of the Proposed Development on the landscape, and biodiversity features; b. The enhancement of biodiversity, landscape value within the DCO Site boundary; c. Securing compliance with relevant national and local planning policies; and d. Habitat creation and management with the aim of providing significant ecological enhancements while strengthening green infrastructure within the area.
Paragraph 5.10.38	The Secretary of State should consider whether requirements to the consent are needed requiring the incorporation of particular design details that are in keeping with the statutory and technical requirements for landscape and visual impact.	The **Proposed Development Parameters Document [EN010154/APP/7.4]** provides guiding parameters for the detailed design of the Proposed Development and is secured by Requirement 6 in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1].** Further design details are secured by reference to the Design Commitments, compliance with which is secured under Requirement 6 as detailed in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1].** Section 1.3 of **The Framework LEMP [EN010154/APP/7.15]** sets out measures in relation to the objectives to:

Policy paragraph	Policy description	Compliance commentary
		a. for the Integration of the Proposed Development into its landscape setting, aiming to avoid or minimise adverse effects on the landscape, biodiversity, heritage and visual effects as much as possible; b. the diversification of Diversify the ecological value of existing habitats through initiatives such as hedgerow restoration, riparian corridor management and the creation of an array of diverse habitats; and c. Guide the design and management of landscape and biodiversity elements that respond to and enhance the character of the landscape, reinforce local distinctiveness, and strengthen the sense of place. A detailed version of the LEMP will be secured via Requirement 8 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Land Use, Including Open Space, Green Infrastructure and Green Belt		
Paragraph 5.11.4	Development of land will affect soil resources, including physical loss of and damage to soil resources, through land contamination and structural damage. Indirect impacts may also arise from changes in the local water	**Chapter 12: Socio-Economics and Land Use** of the ES **[EN010154/APP/6.1]** provides an assessment of how the Proposed Development will affect soils resources during each phase of the Proposed

Policy paragraph	Policy description	Compliance commentary
	regime, organic matter content, soil biodiversity and soil process.	Development. There were no significant adverse effects have been identified in relation to soil. As part of the embedded mitigation measures set out in **Chapter 12: Socio-Economics and Land Use** of the ES **[EN010154/APP/6.1],** a **Framework SMP [EN010154/APP/7.10]** has been produced which contains industry standard good practice mitigation measures to reduce impacts on soil. Mitigation and enhancement measures in relation to soil are further detailed within Section 3 of the **Framework CEMP [EN010154/APP/7.7]**, **Framework OEMP [EN010154/APP/7.8],** and **Framework DEMP [EN010154/APP/7.9].** these will be secured in detail via Requirements 12, 13 and 20 as part of Schedule 2 in the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 5.11.8	The ES (see Section 4.3) 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. The assessment should be proportionate to the scale of the preferred scheme and its likely impacts on such receptors. For developments on previously developed land, the applicant should ensure that they have	Section 12.7 of **Chapter 12: Socio-Economics and Land Use** of the ES **[EN010154/APP/6.1]** contains the assessment of effects which considers local amenities and land use. The areas examined include agricultural land; temporary use; permanent loss; residential properties, business premises and community facilities; recreational receptors and visitor attractions; and development land. The chapter further includes a Cumulative Assessment in Section 12.10, which assesses the potential for cumulative effects between the Proposed Development and other proposed and

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	considered the risk posed by land contamination and how it is proposed to address this.	committed plans and projects including other developments within the surrounding area. Additionally, Section 3 of the **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]** details consideration of relevant Brownfield Registers for understanding existing and proposed land uses. This is supported by a planning history search, the relevant findings of which are reported in **Appendix D: Site Assessment Results** to of the **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]**. The Proposed Development is not located on previously developed land.
Paragraph 5.11.12	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).	**Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]**) sets out the approach to assessing the suitability of the site for the Proposed Development and potential alternative sites against a range of planning, environmental and operational criteria, including best and most versatile agricultural land, for a generating station with capacity of more than 50MW. The site selection process was undertaken in five stages. Following identification of an area of search (Stage 1), all planning and environmental constraints including best and most versatile agricultural land (grades 1, 2 and 3) were excluded in order to seek to

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		identify a site with no constraints (Stage 2). Following identification of potential sites with all constraints excluded (Stage 3) and their evaluation (Stage 4), it was concluded that the search needed to be widened as it was not possible to identify an appropriate site within the parameters defined for Stages 1 to 4 (Stage 5). Alongside other criteria, grade 3 best and most versatile agricultural land was reintroduced back into the area of search. **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]**) sets out how BMV agricultural land was appropriately considered. **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]**) sets out that the vast majority of land within the Proposed Development is Grade 3b agricultural land. It should be noted that a potential alternative site that was closer to the point of connection at the proposed National Grid Substation near Navenby was discounted on the basis that it was comprised principally of Grade 2 BMV land. In addition to being taken into account in site selection, BMV agricultural land has been taken into account in the design of the Proposed Development. Design Principle 2 as detailed in Section 3.9 of the Design Approach Document [EN010154/APP/7.3], which informed the iterative design evolution of the Proposed Development, relates to being sensitive to existing

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		agricultural land and reducing development on BMV land. In terms of the amount of BMV agricultural land within the Principal Site, **Appendix 12-B: Agricultural Land Classification Report** of the ES **[EN010154/APP/6.3]** sets out the results of the ALC survey, as follows: a. There is no Grade 1 or 2 BMV agricultural land within the Principal Site. b. Subgrade 3a - 27.8% c. Subgrade 3b - 68.9% d. Non-agricultural land – 1.5%
Paragraph 5.11.13	Applicants should also identify any effects and seek to minimise impacts on soil health and protect and improve soil quality taking into account any mitigation measures proposed.	**Chapter 12: Socio-Economics and Land Use** of the ES **[EN010154/APP/6.1]** considers soil health and quality as part of its assessment. Measures and mitigations are embedded into the design and a **Framework SMP [EN010154/APP/7.10]** has been prepared which sets out the principles on how the soils will be managed and protected during the construction, phase of the Proposed Development. The **Framework OEMP [EN010154/APP/7.8]** and **Framework DEMP [EN010154/APP/7.9]** further include details of mitigation measures taken to protect soils during these phases.
Paragraph 5.11.14	Applicants are encouraged to develop and implement a Soil Management Plan which could help minimise potential land contamination. The sustainable reuse of soils needs to be carefully considered in line with good practice guidance where large quantities of soils are surplus to requirements or are affected by contamination	

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		The **Framework SMP [EN010154/APP/7.10]** aims to: a. Avoid reducing soil quality due to mixing soil types (limits options for allocation); b. Avoid contamination with construction waste; c. Avoid damaging through compaction or any loss of soils due to poor handling, haulage and stockpiling methodology; d. Avoid contaminating soil as a result of accidental spillage; and e. Avoid loss of soils due to erosion. This is to be secured by Requirement 15 under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1].**
Paragraph 5.11.15	Developments should contribute to and enhance the natural and local environment by preventing new and existing developments 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.	As confirmed within Section 14.4: Ground Conditions of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]**, following the implementation of mitigation measures there are no likely significant effects anticipated in relation to ground conditions and land instability. Section 14.2 of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** concludes that there are no significant adverse effects upon air quality

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		predicted during construction, operation and decommissioning of the Proposed Development. **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]** assesses all potential effects of the Proposed Development upon water bodies which concludes that no significant adverse effects are predicted, following the incorporation of the standard and embedded measures described in Section 9.6 of **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]**. **Chapter 11: Noise and Vibration** of the ES **[EN010154/APP/6.1]** concludes that there are no likely significant effects during construction with the exception of residual precautionary likely significant construction vibration effects identified at three residential receptors (R26 (Grange Cottage), R35 (Housham Grange) and R50 (19 Park Crescent)) during piling for solar structures. The effect is precautionary as calculations are based on percussive piling rigs from BS 5228-2 as vibration data for mini-piling rigs used for solar PV structures is not available. As such, construction vibration effects are likely to be overestimated. No likely significant effects are predicted for the operation and decommissioning stages.
Paragraph 5.11.16	Development should, wherever possible, help to improve local environmental conditions such as air and water	Section 14.2 of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** concludes that there are no significant adverse effects upon air quality

Policy paragraph	Policy description	Compliance commentary
	quality, taking into account relevant information such as river basin management plans.	predicted during construction, operation and decommissioning of the Proposed Development. **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]** assesses all potential effects of the Proposed Development upon water bodies which concludes that no significant adverse effects are predicted, following the incorporation of the standard and embedded measures described in Section 9.6 of **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]**.
Paragraph 5.11.17	Applicants should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination.	As confirmed within Section 14.4: Ground Conditions of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]**, following the implementation of mitigation measures there are no likely significant effects anticipated in relation to ground conditions.
Paragraph 5.11.19	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 Mineral Safeguarding Assessment in **Appendix 12-C: Mineral Safeguarding Assessment** of the ES **[EN010154/APP/6.3]** concludes that no sterilisation of mineral resources will occur due to the Proposed Development.
Paragraph 5.11.20	The general policies controlling development in the countryside apply with equal force in Green Belts but there is, in addition, a general presumption against inappropriate development within them. Such development should not be approved except in very	The Proposed Development is not within the Green Belt.

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	special circumstances. Applicants should therefore determine whether their proposal, or any part of it, is within an established Green Belt and if it is, whether their proposal may be inappropriate development within the meaning of Green Belt policy (see paragraph 5.11.36 below).	
Paragraph 5.11.23	Although in the case of most 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 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 and the protection of soils during construction.	The existing use of the site is mainly agricultural land. Agricultural land quality was a key consideration in the Applicant's site selection process. As set out in the **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]** and**, Chapter 4: Alternatives and Design Evolution** of the ES **[EN010154/APP/6.1]**. The **Design Approach Document [EN010154/APP/7.3]** sets out the Design Vision and Principles of the Proposed Development at Sections 3.8 and 3.9 respectively. The purpose of the **Design Approach Document [EN010154/APP/7.3]** is to demonstrate how the design of the Proposed Development has evolved as a result of an understanding of the site context, the outcomes of environmental assessment, technical engagement with stakeholders and the feedback received at Non-Statutory and Statutory Consultation, and how it aligns with the Design Vision and Principles in order to minimise the negative impacts of the Proposed Development.

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		Chapter 12: Socio-Economics and Land Use of the ES **[EN010154/APP/6.1]** demonstrates consideration of the existing use of the proposed site. The chapter confirms that the agricultural land required for the construction and operation of the Proposed Development will be returned to its original use upon decommissioning. The embedded mitigation measures set out in Section 12.6 of **Chapter 12: Socio-Economics and Land Use** of the ES **[EN010154/APP/6.1]**, such as positioning above ground infrastructure to avoid best and most versatile agricultural land, locating noise emitting equipment away from residential receptors, providing additional planting to integrate the Proposed Development into the local area and avoiding closure of public rights of way, minimise impacts during the construction, operational and decommissioning stages which will mitigate effects on the local community and existing facilities from a socio-economic and land use perspective.
Paragraph 5.11.27	Existing trees and woodlands should be retained wherever possible. In the EIP, the Government committed to increase the tree canopy and woodland cover to 16.5% of total land areas of England by 2050. The applicant should assess the impacts on, and loss of, all trees and woodlands within the project boundary and develop mitigation measures to minimise adverse	The **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]** details the consideration of trees in the selection of the site. Consideration towards the protection of trees is further noted within Section 5.1 of the **Design Approach Document [EN010154/APP/7.3]**, which has informed

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	impacts and any risk of net deforestation as a result of the scheme. Mitigation may include, but is not limited to, the use of buffers to enhance resilience, improvements to connectivity, and improved woodland management. Where woodland loss is unavoidable, compensation schemes will be required, and the long-term management and maintenance of newly planted trees should be secured.	the development of the design of the Proposed Development, including the use of buffers and offsets. In line with the **Figure 7.15-1: Landscape Mitigation Plan** (presented within the **Framework LEMP [EN010154/APP/7.15]**), the Proposed Development design includes undeveloped areas of at least 15m between woodlands, and appropriate buffers between veteran or ancient trees (based on tree root protection areas) and the Proposed Development, thereby avoiding any direct impacts on these habitat types. Tunman / Housham Woods are immediately adjacent to the Order Limits but as described in **Table 8-15** of **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]**, there will be no direct or indirect impacts to these habitats. An assessment of trees is provided in **Appendix 10-G: Arboricultural Impact Assessment** of the ES **[EN010154/APP/6.3]** which concludes that part of one group of high quality (Category A); six individual trees, one tree group, part of three groups and part of two hedgerows of moderate quality (Category B); and seven individual trees, part of four tree groups, one hedgerow and part of 81 hedgerows of low quality (Category C) are likely to be removed to facilitate the Proposed Development. In addition, two individual trees and part of one hedgerow, identified as unsuitable for retention for more than ten years as living trees in the context of

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		the current land use (Category U) are likely to be removed to facilitate the Proposed Development. Tree removals are assessed on a worst-case scenario and are required due to a direct conflict with the footprint of proposed new structures, areas of hard surfacing, security fencing and the associated working space requirements to install these features. No trees subject to Tree Preservation Order or within a Conservation Area are to be removed. Mitigation measures, such as excluding significant areas of broad-leaved woodland, such as Stocking Wood, which is now outside of the Order Limits, are set out in the **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1].** The **Framework LEMP [EN010154/APP/7.15]** and **Framework CEMP [EN010154/APP/7.7]** are to be secured by Requirements 8 and 12 under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 5.11.28	Where a proposed development has an impact upon a Mineral Safeguarding Area (MSA), the Secretary of State should ensure that appropriate mitigation measures have been put in place to safeguard mineral resources.	**Appendix 12-C: Mineral Safeguarding Assessment** of the ES **[EN010154/APP/6.3]** confirms that whilst the Proposed Development is partially located with an MSA, no permanent sterilisation of the mineral resource will occur. It further concludes the ability of future generations to extract the resource over the long term will not be compromised.

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Paragraph 5.11.30	Public 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 Secretary of State should expect applicants to take appropriate mitigation measures to address adverse effects on coastal access, National Trails, other rights of way and open access land and, where appropriate, to consider what opportunities there may be to improve or create new access. In considering revisions to an existing right of way, consideration should be given to the use, character, attractiveness, and convenience of the right of way	The Proposed Development has considered existing PRoW in the site selection and evolution of design. **Appendix D: Site Assessment Results** of the **Appendix A: Site Selection Report** to the **Planning Statement [EN010154/APP/7.2]** details how existing PRoW were considered in site selection. **Chapter 12: Socio-Economics and Land Use** of the ES **[EN010154/APP/6.1]** assesses the impacts of the Proposed Development on PRoW in Section 12.5. The Proposed Development would require the long term closure and diversion of the following PRoW: a. LL/Aubo/10/1 PRoW; b. LL/TOTH/13/1 PRoW; and c. LL/ThuN/2/1. Given the large network of PRoWs, roads and existing permissive paths in the area that could be used as substitutes, the sensitivity of the PRoWs being assessed is considered to be low and given the short diversions, the effects would be negligible. Section 12.6 notes embedded mitigation measures implemented in relation minimising impacts to PRoW, including avoiding closure of PRoW and existing permissive paths and keeping any PRoW diversions as localised as reasonably practicable. Additional permissive paths are proposed to further enhance local

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		connectivity. Details on the management of PRoW, which includes the mitigation measures taken, are provided in a **Framework PRoW-MP [EN010154/APP/7.14]** to be secured in detail by Requirement 18 of the **Draft Development Consent Order [EN010154/APP/3.1].** The **Framework PRoW-MP [EN010154/APP/7.14]** details consideration of the use, character, attractiveness, and convenience of the PRoW. Detailed PRoW mitigation measures are provided within the **Framework CEMP [EN010154/APP/7.7], Framework DEMP [EN010154/APP/7.9]** and **Framework OEMP [EN010154/APP/7.8],** to be secured in detail by Requirements 12, 20 and 13 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
	The Secretary of State should ensure that applicants do not site their scheme on the best and most versatile agricultural land without justification. Where schemes are to be sited on best and most versatile agricultural land the Secretary of State should take into account the economic and other benefits of that land. Where development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.	**Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]** details how the site was selected with consideration given to avoiding agricultural land where possible. The Order Limits avoid Grade 1 and 2 land entirely. The **Statement of Need [EN010154/APP/7.1]** demonstrates that there is a critical need for the Proposed Development. Whilst Section 5 of the **Planning Statement [EN010154/APP/7.2]** sets out the benefits of the Proposed Development which go alongside support the justification for inclusion of BMV

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		land (Grade 3a) as these to enable the Proposed Development to contribute to supporting net zero and the security of supply in addition to contributing to affordability and the reduction of costs for consumers.
Noise and Vibration		
Paragraph 5.12.4	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 Secretary of State in accordance with the Biodiversity and Geological Conservation section of this NPS at Section 5.4. This should consider underwater noise and vibration especially for marine developments. Underwater noise can be a significant issue in the marine environment, particularly in regard to energy production.	**Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** includes an assessment of the likely effects from disturbance – indirect impacts resulting from a change in normal conditions (e.g., light, noise, vibration and human activity) that result in individuals or populations of species changing behaviour or range. No significant adverse effects from noise on ecological receptors have been reported in Section 8.12 of **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1].** Mitigation measures are proposed to minimise these, including measures are included within the **Framework CEMP [EN010154/APP/7.7]** and **Framework DEMP [EN010154/APP/7.9]**, secured as part of the DCO Requirements of the **Draft Development Consent Order [EN010154/APP/3.1]**. These measures include retention and avoidance (where practicable) of habitats and pollution (e.g. spillages, noise, light) control.

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Paragraph 5.12.6	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 characteristics, if the noise is impulsive, whether the noise contains particular high or low frequency content or any 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 o in the shorter term, such as during the construction period o in the longer term, during the operating life of the infrastructure o 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	**Chapter 13: Noise and Vibration** of the ES **[EN010154/APP/6.1]** presents a noise assessment in accordance with the requirements of this policy. The assessment has considered noise impacts from all phases of the Proposed Development as well as traffic and transport associated with it. The methodology adopted for the assessment is detailed within Section 11.4. Noise sensitive receptors and the respective impacts on health and quality of life are also considered.

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	receptors, including an assessment of any likely impact on health and quality of life / well-being where appropriate, particularly among those disadvantaged by other factors who ae often disproportionately affected by noise-sensitive areas • if likely to cause disturbance, an assessment of the effect of underwater or subterranean noise • all reasonable steps taken to mitigate and minimise potential adverse effects on health and quality of life	
Paragraph 5.12.7	The nature and extent of the noise assessment should be proportionate to the likely noise impact.	The noise assessment is proportionate to the likely noise impacts set out in **Chapter 11: Noise and Vibration** of the ES **[EN010154/APP/6.1]**. The scope of the assessment and associated justification is set out in paragraphs 11.4.8 and 11.4.9 of **Chapter 11: Noise and Vibration** of the ES **[EN010154/APP/6.1].**
Paragraph 5.12.8	Applicants should consider the noise impact of ancillary activities associated with the development, such as increased road and rail traffic movements, or other forms of transportation.	In accordance with this policy, Sections 11.7 and 11.9 of **Chapter 11: Noise and Vibration of the** ES **[EN010154/APP/6.1]** confirms the consideration of noise impacts in accordance with this policy. Changes in road traffic noise due to construction traffic are identified at worst as minor and not significant and therefore no adverse impacts on receptors are predicted. Appropriate routing of construction traffic on public roads and along access tracks will be implemented to avoid sensitive areas where practicable. This approach is set out in the **Framework**

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		CTMP [EN0101054/APP/7.18] and secured by Requirement 14 under Schedule 2 of the **Draft Development Consent Order [EN0101054/APP/3.1]**.
Paragraph 5.12.9	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 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.	**Chapter 11: Noise and Vibration** of the ES **[EN010154/APP/6.1]** assesses operational noise at the identified sensitive noise receptors following BS 4142 guidance whereby the rating level of noise emissions from activities is compared against the background level of the pre-developed noise climate. Further reference is made to: a. Planning Practice Guidance Noise (PPGN); b. British Standard (BS) 5228-1:2009+A1:2014 – Code of practice for noise and vibration control on construction and open sites. Part 1: Noise; c. BS 5228-2:2009+A1:2014 – Code of practice for noise and vibration control on construction and open sites. Part 2: Vibration; d. BS 7445-1:2003 – Description and environment of environmental noise – Part 1: Guide to quantities and procedures;

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		e. BS 4142:2014+A1:2019 – Methods for rating and assessing industrial and commercial sound; f. BS 8233:2014 – Guidance on sound insulation and noise reduction for buildings; g. World Health Organization Guidelines for Community Noise; h. Calculation of Road Traffic Noise; and i. Institute of Environmental Management and Assessment Guidelines for Environmental Noise Impact Assessment (IEMA Guidelines).
Paragraph 5.12.12	Applicants should submit a detailed impact assessment and mitigation plan as part of any development plan, including the use of noise mitigation and noise abatement technologies during construction and operation	**Chapter 11: Noise and Vibration** of the ES **[EN010154/APP/6.1]** provides a detailed impact assessment and mitigation plan for noise and vibration impacts. The measures to control noise represent Best Practicable Means (BPM) as defined in Annex B of BS 5228-1 and Section 72 of the Control of Pollution Act 1974). Measures to control noise are secured within the **Framework CEMP [EN010154/APP/7.7]** and **Framework DEMP [EN010154/APP/7.9]** as well as within the **Framework CTMP [EN010154/APP/7.18]**.
Paragraph 5.12.13	The Secretary of State 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 Secretary of State may wish to impose mitigation measures. Any such mitigation measures should take account of the NPPF or any successor to it and the Planning Practice Guidance on Noise.	

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		Requirement 16 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]** states that the Proposed Development may not be operational until an operational noise assessment has been submitted to and approved by the planning authority. The operational noise assessment must demonstrate how the design of the Proposed Development has incorporated mitigation to comply with the operational noise rating levels set out in the ES. In line with the NPPF, the Proposed Development has been designed following the mitigation hierarchy, as far as practicable, to avoid or reduce noise and vibration impacts and effects. With the implementation of design measures, along with other control measures noted above, potential significant adverse effects for noise during construction and noise and vibration during operation and decommissioning can be avoided.
Paragraph 5.12.14	Mitigation measures may include one or more of the following: • engineering: reducing the noise generated at source and/or containing the noise generated • lay-out: where possible, optimising the distance between the source and noise sensitive receptors and/or incorporating good design to minimise noise transmission through the use of screening	Section 11.7 of **Chapter 11: Noise and Vibration** of the ES **[EN010154/APP/6.1]** details the embedded mitigation measures that have been embedded in the Proposed Development design and construction methodology to minimise adverse effects where practicable. These include embedded design measures representing Best Practicable Means (BPM) during construction and decommissioning works and secured within the **Framework CEMP [EN010154/APP/7.7]** and **Framework DEMP [EN010154/APP/7.9]**. The BPM

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	by natural or purpose-built barriers, or other buildings • administrative: using planning conditions/obligations to restrict activities allowed on the site at certain times and/or specifying permissible noise limits/ noise levels, differentiating as appropriate between different times of day, such as evenings and late at night, and taking into account seasonality of wildlife in nearby designated sites • insulation: mitigating the impact on areas likely to be affected by noise including through noise insulation when the impact is on a building.	measures include a range of engineering, lay-out, administrative, and insulation techniques. Embedded mitigation measures applied during the operational phase include: a. Plant selection (noise emissions will be one of the criteria evaluated when procuring equipment for use on the site) and; b. Design, location and orientation of Solar Stations, BESS and the Onsite Substation to minimise noise at receptors.
Paragraph 5.12.15	The project should demonstrate good design through selection of the quietest or most acceptable cost-effective plant available; containment of noise within buildings wherever possible, taking into account any other adverse impacts that such containment might cause (e.g. on landscape and visual impacts; optimisation of plant layout to minimise noise emissions; and, where possible, the use of landscaping, bunds or noise barriers to reduce noise transmission)	Section 4.4 of The **Design Approach Document [EN010154/APP/7.3]** sets out how the design of the Proposed Development which has included sensitive siting of plant equipment, including the BESS, to minimise noise impacts where possible.
Paragraph 5.12.16	A development must be undertaken in accordance with statutory requirements for noise. Due regard must be given to the relevant sections of the Noise Policy	Section 11.2 of **Chapter 11: Noise and Vibration** of the ES **[EN010154/APP/6.1]** considers relevant sections of the Noise Policy Statement for England (NPSE), the NPPF, and the government's associated planning

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	Statement for England, the NPPF, and the government's associated planning guidance on noise.	guidance on noise, set out within Section 11.2 of the chapter.
Paragraph 5.12.17	The Secretary of State should not grant development consent unless they are satisfied that the proposals will meet the following aims, through the effective management and control of noise: • 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 • where possible, contribute to improvements to health and quality of life through the effective management and control of noise	**Chapter 11: Noise and Vibration** of the ES **[EN010154/APP/6.1]** concludes that with the implementation of mitigation measures significant noise and vibration impacts will be avoided during the construction, operation, and decommissioning of the Proposed Development will be avoided, the exception is save for three precautionary likely significant construction vibration effects. Although the conclusion acknowledges that these vibration effects are likely to be overestimated. Mitigation measures have been embedded into the Proposed Development design and construction methodology to minimise adverse effects where practicable, as set out in Section 11.6 of **Chapter 11: Noise and Vibration** of the ES **[EN010154/APP/6.1].** These include embedded design measures representing Best Practicable Means (BPM) during construction and decommissioning. Measures are managed through a **Framework CEMP [EN010154/APP/7.7]** and **Framework DEMP [EN010154/APP/7.9]**. Efforts to ensure the Proposed Development responds sensitively to sensitive receptors in relation to noise are further outlined in Requirement 16 under Schedule 2 of the **Draft Development Consent Order**
Paragraph 5.12.18	When preparing the Development Consent Order, the Secretary of State should consider including measurable requirements or specifying the mitigation measures to be put in place to ensure that noise levels do not exceed any limits specified in the development consent. These requirements or mitigation measures may apply to the construction, operation, and decommissioning of the energy infrastructure development.	

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		[EN010154/APP/3.1] which requires a detailed operational noise plan to be submitted and approved by the local authorities detailing how the design of the Proposed Development has incorporated mitigation to ensure that the operational noise rating levels set out in the Environmental Statement are to be complied with. As set out in Section 11.9 of **Chapter 11: Noise and Vibration** of the ES **[EN010154/APP/6.1]** no significant noise or vibration effects are identified with the exception of precautionary significant vibration effects due to solar PV structure piling; however, it is expected that these significant effects would not occur. As such, the noise and vibration assessment demonstrates compliance with the first aim of the NPSE by avoiding significant effects on health and quality of life. Mitigation measures covered in Section 11.6 and Section 11.8 cover all reasonable measures to mitigate adverse effects on health and quality of life. As such, the noise and vibration assessment demonstrate compliance with the second aim of the NPSE. Although the Proposed Development does result in adverse noise effects, all reasonable measures have been applied to reduce the impact on nearby communities to an acceptable level. This has been achieved through appropriate design and locating of noise generating plant. Measures to effectively manage and control noise emissions throughout the lifespan of

Policy paragraph	Policy description	Compliance commentary
		the project are secured in the **Framework OEMP [EN010154/APP/7.8]**. As such, the noise and vibration assessment demonstrate compliance with the third aim of the NPSE.
Socio-Economic Impacts		
Paragraph 5.13.2	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 4.3)	An assessment of these impacts is undertaken in **Chapter 12: Socio-Economics and Land Use** of the ES **[EN010154/APP/6.1]**. In summary, the chapter identifies some minor beneficial effects in relation to employment and Gross Value Added (GVA) during in construction and decommissioning.
Paragraph 5.13.3	The applicant is strongly encouraged to engage with relevant local authorities during early stages of project development so that the applicant can gain a better understanding of local or regional issues and opportunities.	The Applicant has engaged with relevant local authorities, throughout the pre-application period as set out in the **Consultation Report [EN010154/APP/5.1]**.
Paragraph 5.13.4	The applicant's 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	**Chapter 12: Socio-Economics and Land Use** of the ES **[EN010154/APP/6.1]** provides an assessment of all potential socio-economic impacts of the Proposed Development, in accordance with this policy. The impacts and effects are assessed for each phase of the Proposed Development as detailed in Section 12.7 of the chapter. The construction period is expected to take approximately 24 to 30 months. During this period, it is

Policy paragraph	Policy description	Compliance commentary
	• 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 (positive and negative) on tourism and other uses of the area impacted • 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, there could be some short-term negative effects, for example a	estimated that the Proposed Development will support, on average, 394 total net jobs per annum. As per the **Framework ESSCP [EN010154/APP/7.16]** the peak number of staff required across the Proposed Development is estimated at 600 FTE jobs. **Chapter 12: Socio-Economic and Land Use** of the ES **[EN010154/APP/6.1]** sets out that it is estimated that construction activity will contribute approximately £27.4 million to the national economy, of which approximately £12.3 million would likely be within the local area (see paragraph 12.7.16 of **Chapter 12: Socio-Economic and Land Use** of the ES **[EN010154/APP/6.1]** describes how this figure has been calculated based on the average GVA per construction worker in the East Midlands). During the operational phase, the Proposed Development will generate long-term jobs. The Applicant has estimated that to operate and maintain the Proposed Development there will be a gross number of four permanent jobs generated. It is noted that there is expected to be two visiting workers per week and additional staff occasionally when the solar infrastructure needs replacing or cleaning, totalling up to 20 staff per day. As stated in **Chapter 12: Socio-Economic and Land Use** of the ES **[EN010154/APP/6.1]**, it is expected that when the rent revenues from the land start, then there will be

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	potential shortage of construction workers to meet the needs of other industries and major projects within the region	additional jobs created on their farms offsite as landowners diversify their land further with the underlying financial stability of the rental income. Analysis of the hotel, bed and breakfast and inns accommodation sector has been undertaken and reported in **Chapter 12: Socio-Economic and Land Use** of the ES **[EN010154/APP/6.1]** to assess the likely capacity against the demand from the potential peak construction workforce. **Chapter 12: Socio-Economic and Land Use** of the ES **[EN010154/APP/6.1]** concludes that there would be no effect on the hotel, bed and breakfast, and inns accommodation sector arising from the Proposed Development. It is anticipated that accommodation providers would be able to accommodate employees working at the Proposed Development without any adverse effects on the sector. Additional information in relation to the contribution of the Proposed Development to the economy and energy industry at both a local and national level is available in the **Framework ESSCP [EN010154/APP/7.16]**.
Paragraph 5.13.5	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.	**Chapter 12: Socio-Economics and Land Use** of the ES **[EN010154/APP/6.1]** describes the existing socio-economic baseline conditions of the study area, which are detailed in Section 12.5 of the chapter. The Proposed Development's compliance with local policies is considered in **Appendix C: Local Policy**

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		Accordance Tables of the **Planning Statement [EN010154/APP/7.2]**.
Paragraph 5.13.6	Socio-economic impacts may be linked to other impacts, for example visual impacts considered in Section 5.10 but may also have an impact on tourism and local businesses. Applicants are encouraged, where possible, to demonstrate that local suppliers have been considered in any supply chain.	**Chapter 12: Socio-Economics and Land Use** of the ES **[EN010154/APP/6.1]** provides an assessment of the Proposed Development's impact on socio-economics and land use. This includes consideration of supply chains and local suppliers. Consideration of local suppliers in the supply chain is detailed in the **Framework ESSCP [EN010154/APP/7.16]**, which confirms the Applicant will take measures to maximise benefits to local businesses from spending on goods and services during each phase of the Proposed Development. As stated in **Chapter 12: Socio-Economic and Land Use** of the ES **[EN010154/APP/6.1]**, it is expected that when the rent revenues from the land commence, then there will be additional jobs created on their farms offsite as landowners diversify their land further with the underlying financial stability of the rental income. Analysis of the hotel, bed and breakfast and inns accommodation sector has been undertaken and reported in **Chapter 12: Socio-Economic and Land Use** of the ES **[EN010154/APP/6.1]** to assess the likely capacity against the demand from the potential peak construction workforce. **Chapter 12: Socio-Economic and Land Use** of the ES **[EN010154/APP/6.1]** concludes that there would be no effect on the hotel,
Paragraph 5.13.7	Applicants should consider developing accommodation strategies where appropriate, especially during construction and decommissioning phases, that would include the need to provide temporary accommodation for construction workers if required.	

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		bed and breakfast, and inns accommodation sector arising from the Proposed Development. It is anticipated that accommodation providers would be able to accommodate employees working at the Proposed Development without any adverse effects on the sector.
Paragraph 5.13.8	The Secretary of State 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.	Section 3 of the **Design Approach Document [EN010154/APP/7.3]** details how the Proposed Development has sought to achieve a high quality design through the Design Principles. **Appendix A: Design Commitments** of the **Design Approach Document [EN010154/APP/7.3]** sets out a series of design commitments to support these Design Principles. Examples include: a. AM1 - A minimum offset of 50m from solar infrastructure will be included around all residential properties to minimise impacts to their visual amenity. b. AM2 - Temporary construction compounds in the cable corridor will be located so as not to create a significant impact to visual, noise and lighting impacts and not have a higher impact than that assessed within the ES. **Chapter 12: Socio-Economics and Land Use** of the ES **[EN010154/APP/6.1]** demonstrates that the Applicant has implemented mitigation measures to minimise adverse impacts including the layout of the

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		Proposed Development whereby infrastructure is located to avoid BMV land and PRoWs, as far as possible. Additional embedded mitigation measures set out in **Chapter 12: Socio-Economics and Land Use** of the ES **[EN010154/APP/6.1]** include: a. avoiding the closure of PRoW and existing permissive paths and keeping any PRoW diversions as localised as reasonably practicable. b. Provision of approximately 9.5km of additional permissive paths to enhance local connectivity c. Development of an optimal access strategy for construction, operation and decommissioning to mitigate effects relating to transport, which in turn will mitigate the effects on the local community and existing facilities from a socio-economic and land use perspective. As set out in **Chapter 12: Socio-Economics and Land Use** of the ES **[EN010154/APP/6.1]**, following the implementation of embedded mitigation measures, there are no significant adverse effects in relation to socio-economics, with some minor beneficial effects in relation to employment and GVA during construction and decommissioning identified.
Paragraph 5.13.9	The Secretary of State should have regard to the potential socio-economic impacts of new energy	**Chapter 12: Socio-Economics and Land Use** of the ES **[EN010154/APP/6.1]** provides an assessment of all

Policy paragraph	Policy description	Compliance commentary
	infrastructure identified by the applicant and from any other sources that the Secretary of State considers to be both relevant and important to its decision.	potential socio-economic impacts of the Proposed Development. With mitigation measures in place, **Chapter 12: Socio-Economic and Land Use** of the ES **[EN010154/APP/6.1]** concludes there are negligible, not significant, effects for all phases of development in relation to socio-economics and land use.
Paragraph 5.13.10	The Secretary of State may conclude that limited weight is to be given to assertions of socio-economic impacts that are not supported by evidence (particularly in view of the need for energy infrastructure as set out in this NPS).	**Chapter 12: Socio-Economic and Land Use** of the ES **[EN010154/APP/6.1]** identifies some minor beneficial effects in relation to employment and GVA during construction and decommissioning. Mitigation is provided through the **Framework CEMP [EN010154/APP/7.7]**, **Framework CTMP [EN010154/APP/7.18]**, **Framework PRoW-MP [EN010154/APP/7.14]**, **Framework ESSCP [EN010154/APP/7.16]**, **Framework LEMP** [**EN010154/APP/7.15**], **Framework OEMP [EN010154/APP/7.8]**, and **Framework DEMP** [**EN010154/APP/7.9]**.
Paragraph 5.13.11	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.	In terms of legacy benefits, should the Proposed Development be consented, the Applicant will provide a sum of £400/MWac per annum during its operational life, in line with guidance. Whilst this does not form part of the DCO application and does not comprise a benefit in the context of the planning balance, it does comprise a benefit of the Proposed Development to the wider community.

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Paragraph 5.13.12	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.	The Applicant has included a **Framework ESSCP [EN010154/APP/7.16],** which demonstrates consideration towards opportunities to promote local employment and develop skills. This will be secured by Requirement 19 under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Traffic and Transport		
Paragraph 5.14.1	The transport of materials, goods and personnel to and from a development during all project phases can have a variety of impacts on the surrounding transport infrastructure and potentially on connecting transport networks, for example through increased congestion. Impacts may include economic, social and environmental effects.	**Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]** provides an assessment of the impact of the Proposed Development on traffic and transport during the construction, operation, and decommissioning phases, including a transport appraisal. With the embedded mitigation measures in the **Framework CTMP [EN010154/APP/7.18]**, **Framework CEMP [EN010154/APP/7.7], Framework PRoW-MP [EN010154/APP/7.14],** and **Framework OEMP [EN010154/APP/7.8],** there are no residual significant effects of the Proposed Development on any of the Traffic and Transport receptors. Note there are slight adverse, or neutral (not significant) cumulative effects expected on Traffic and Transport receptors which refers to the construction phase of the Proposed Development only, and similar effects are expected in decommissioning. A significant beneficial impact is
Paragraph 5.14.2	Environmental impacts may result particularly from trips generated on roads which may increase noise and air pollution as well as greenhouse gas emissions.	

Policy paragraph	Policy description	Compliance commentary
		identified with regard to enhancements created through PRoW. Section 11.9 within **Chapter 11 Noise and Vibration** of the ES **[EN010154/APP/6.1]** concludes that there will be no likely significant effects as a result of traffic noise during construction. Section 14.2 (**Table 14-9**) of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** concludes there are no significant effects from emissions during construction and decommissioning, including emissions from road traffic. **Table 6-24** in **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** sets out that during construction of the Proposed Development, there will be unavoidable GHG emissions due to the use of materials, energy, fuel, and transportation. However, additional GHG savings are expected to be achieved by implementing the GHG mitigation measures referenced in Section 6.4 of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** which for transport include: a. Liaising with construction personnel for the potential to implement staff minibuses and car sharing options; b. Implementing a Travel Plan in the Construction Traffic Management Plan (CTMP)

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		c. Switching vehicles and plant off when not in use and ensuring construction vehicles conform to current EU emissions standards.
Paragraph 5.14.3	Disturbance caused by traffic and abnormal loads generated during the construction phase will depend on the scale and type of the proposal.	The Proposed Development will require abnormal vehicles during construction. A specialised haulage service will be employed to allow these components to be transported with the necessary escort, permits and traffic management, with the Applicant consulting the relevant highways authorities to ensure the correct permits are obtained. The police will also be given advanced notification under the Road Vehicle Authorisation of Special Types Order 2003. The abnormal vehicles will be required to follow the abnormal vehicle routing strategy (**Figure 13-5** of the ES **[EN010154/APP/6.2]**) when travelling to/ from the Site. It should be noted that the assessment of the AIL routing is not expected to change any of the conclusions set out within the **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]**). The Proposed Development is not expected to require a significant number of AILs and the peak construction assessment focuses explicitly on the movements of construction worker trips and materials (HGV and LGV).
Paragraph 5.14.4	The consideration and mitigation of transport impacts is an essential part of Government's wider policy objectives	**Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]** assesses the impacts of the Proposed Development on traffic and transport and details in Section 13.6 how mitigation measures have

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	for sustainable development as set out in Section 2.6 of this NPS.	been embedded within the design of the Proposed Development. With the embedded mitigation measures in the **Framework CTMP [EN010154/APP/7.18]**, **Framework CEMP [EN010154/APP/7.7], Framework PRoW-MP [EN010154/APP/7.14],** and **Framework OEMP [EN010154/APP/7.8],** there are no residual significant effects of the Proposed Development on any traffic and transport receptors.
Paragraph 5.14.5	If a project is likely to have significant transport implications, the applicant's ES (see Section 4.3) should include a transport appraisal. The DfT's Transport Analysis Guidance (TAG) and Welsh Governments WelTAG provides guidance on modelling and assessing the impacts of transport schemes.	**Appendix 13-F: Transport Assessment Note (TAN)** of the ES **[EN010154/APP/6.3]** has been prepared in place of a standard Transport Assessment (TA). This approach is designed to reduce repetition and provide consistency between the submission documents and cross-references have been made to relevant sections of **Chapter 13: Traffic and Transport [EN010154/APP/6.1]** where necessary. This approach follows agreement with LCC Highways and National Highways. The TAN in combination with **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]**, the **Framework CTMP [EN010154/APP/7.18]**, and the **Framework PRoW-MP [EN010154/APP/7.14]** set out the transport effects of the Proposed Development.
Paragraph 5.14.6	National Highways and Highways Authorities are statutory consultees on NSIP applications including energy infrastructure where it is expected to affect the strategic road network and / or have an impact on the local road network., and Application network. Applicants	National Highways and local authorities have been consulted on prior to submission. **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]** details

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	should consult with National Highways and Highways Authorities as appropriate on the assessment and mitigation to inform the application to be submitted.	the responses to the statutory consultation in relation to traffic and transport in **Table 13-2**.
Paragraph 5.14.7	The applicant should prepare a travel plan including demand management and monitoring measures to mitigate transport impacts. The applicant should also provide details of proposed measures to improve access by active, public and shared transport to: • reduce the need for parking associated with the proposal; • contribute to decarbonisation of the transport network; and • Improve user travel options by offering genuine modal choice	A Travel Plan is included within the **Framework CTMP [EN010154/APP/7.18]** in support of the Proposed Development. The **Framework CTMP [EN010154/APP/7.18]** is secured under Requirement 14 in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. This includes reducing the volume of construction staff associated with construction; maximising the safe and efficient movement of materials; minimising the effect on PRoW; and minimising impacts to the local community and visitors to the area. As stated in the **Framework CTMP [EN010154/APP/7.18]** in relation to the shuttle bus service provision, if additional demand is identified by the monitoring carried out as part of the detailed CTMP (which will be secured through the **Draft Development Consent Order [EN010154/APP/3.1]**) then additional shuttle services will be provided to further reduce the number of construction staff vehicles on the network. Given the locations of the nearest rail and bus services/ stops to the Proposed Development and considering the public transport timetables in relation to the construction staff working hours, there will be limited
Paragraph 5.14.8	The assessment should also consider any possible disruption to services and infrastructure (such as road, rail and airports).	

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		opportunity for construction staff to travel to the Principal Site by rail or bus. Nevertheless, sustainable travel will be promoted for usage by construction staff travelling to/ from the Principal Site with further details set out within this document. The above mode share is considered to provide a robust assessment in terms of the number of construction staff vehicles forecast.
Paragraph 5.14.9	If additional transport infrastructure is needed or proposed, it should always include good quality walking, wheeling and cycle routes, and associated facilities (changing/storage etc.) needed to enhance active transport provision.	**Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]** considers the existing transport infrastructure. The **Framework PRoW-MP [EN010154/APP/7.14]** outlines how Public Rights of Way (PRoW) will be managed within the DCO Site to ensure they have been suitably considered and will continue to operate effectively throughout the construction, operation and decommissioning of the Proposed Development. During the operational phase, access to all existing PRoW within the DCO Site will be maintained, with existing width retained, if not increased. There will be at least 5 metres spacing either side of the centreline of each PRoW, creating a minimum width of 10 metres, to avoid the perception of 'tunnelling' into narrow passages between PV panels. The Proposed Development will also create approximately 9.5km of new permissive paths across the Principal Site.

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		Additionally, the Proposed Development aims to minimise impacts on traffic and transport through its design and siting as detailed within the **Design Approach Document [EN010154/APP/7.3]** and **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]**.
Paragraph 5.14.11	Where mitigation is needed, possible demand management measures must be considered. This could include identifying opportunities to: • reduce the need to travel by consolidating trips, • locate development in areas already accessible by active travel and public transport, • provide opportunities for shared mobility, • re-mode by shifting travel to a sustainable mode that is more beneficial to the network, • retime travel outside of the known peak times, • reroute to use parts of the network that are less busy	**Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]** has assessed impacts on traffic and transport and contains detailed of the embedded mitigation measures which manage and mitigate these impacts. The siting of the Proposed Development, in terms of access to the strategic and local road network which provides good access for construction traffic, was a consideration in the site selection process as detailed within **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]** and supported by the **Design Approach Document [EN010154/APP/7.3]**. The mitigation measures set out in **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]** and provided for in the **Framework CTMP [EN010154/APP/7.18]** include consideration of opportunities such as those identified within Paragraph 5.14.11 of the NPS, these are detailed within Section 13.6 of the chapter. This includes reducing vehicle trips where possible such as encouraging local construction staff to car share through an incentivised approach to

Policy paragraph	Policy description	Compliance commentary
		reduce vehicle trips on the surrounding highway network. These measures will be managed through the **Framework CTMP [EN010154/APP/7.18]**, **Framework CEMP [EN010154/APP/7.7], Framework DEMP [EN010154/APP/7.9]**, and **Framework PRoW-MP [EN010154/APP/7.14]**. These measures include restricting HGV movements to certain routes and deliveries to certain times of day; maintaining access to and along PRoWs; and implementing and a Temporary Traffic Management (TTM) plan.
Paragraph 5.14.12	If feasible and operationally reasonable, such mitigation should be required, before considering requirements for the provision of new inland transport infrastructure to deal with remaining transport impacts. All stages of the project should support and encourage a modal shift of freight from road to more environmentally sustainable alternatives, such as rail, cargo bike, maritime and inland waterways, as well as making appropriate provision for and infrastructure needed to support the use of alternative fuels including charging for electric vehicles.	Consideration of environmentally sustainable practices is given in **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1].** This includes reducing vehicle trips where possible such as encouraging local construction staff to car share through an incentivised approach to reduce vehicle trips on the surrounding highway network. These measures cover the construction and decommissioning periods and are provided in the **Framework CTMP [EN010154/APP/7.18]**, **Framework CEMP [EN010154/APP/7.7]**, and **Framework DEMP [EN010154/APP/7.9].** The **Framework CTMP [EN010154/APP/7.18]** includes measures in relation to promoting cycling through the provision of cycle parking spaces. These Framework Plans will be secured in detail by Requirements under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.

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		Given the locations of the nearest rail and bus services/ stops to the Proposed Development and considering the public transport timetables in relation to the construction staff working hours, there will be limited opportunity for construction staff to travel to the Principal Site by rail or bus. Due to the location of the Proposed Development, the use of maritime or inland waterways for freight is not possible.
Paragraph 5.14.13	Regard should always be given to the needs of freight at all stages in the construction and operation of the development including the need to provide appropriate facilities for HGV drivers as appropriate.	Freight is considered within the assessment in Chapter **13: Traffic and Transport** of the ES **[EN010154/APP/6.1],** which contains a number of embedded mitigation measures in relation to the management of HGV vehicles. These measures are managed through the **Framework CTMP [EN010154/APP/7.18]**, which identifies the management of freight and construction traffic including HGVs and LGVs. This includes consideration of HGV access and transport, coordination of deliveries, and parking. The measures, such as the provision of mobile welfare units at the main construction compound, are provided in the **Framework CEMP [EN010154/APP/7.7]**, and **Framework DEMP [EN010154/APP/7.9]** and secured in detail by Requirements 12 and 20 under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.

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Paragraph 5.14.14	The Secretary of State 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, and associated high quality drive facilities either on the site or at dedicated facilities elsewhere, to support driver welfare, avoid 'overspill' parking on public roads, prolonged queuing on approach roads and uncontrolled on-street HGV parking in normal operating conditions • ensure satisfactory arrangements for reasonably foreseeable abnormal disruption, in consultation with network providers and the responsible police force.	HGVs are considered within the assessment in **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1],** which contains a number of embedded mitigation measures in relation to the management of HGV vehicles. This includes restricting HGV movements to certain routes, managing HGV movements to avoid peak network hours (8am–9am and 5pm–6pm), reducing HGV deliveries to certain times, implementing a Delivery Management System and monitoring system to control HGV deliveries and monitor HGV travel. With these mitigation measures in place, **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]** concludes that there will be no significant effects relating to HGV's and therefore additional control measures are not considered to be required. These measures are managed through the **Framework CTMP [EN010154/APP/7.18]**, which is responsible for the management of HGVs and LGVs. The **Framework CTMP [EN010154/APP/7.18]** details measures for HGV movements. The measures are provided in the **Framework CEMP [EN010154/APP/7.7]**, and **Framework DEMP [EN010154/APP/7.9]** along with the **Framework CTMP [EN010154/APP/7.18]** are secured in detail by Requirements 12 (CEMP), 20 (DEMP) and 14 (CTMP) under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.

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		A detailed assessment of the abnormal vehicles required for the Principal Site and/or the Cable Corridor will be carried out post consent once an appropriate haulage company has been identified and the specific dimensions of the abnormal loads are known. The haulage company will assess the movement associated with the delivery of a transformer as well as cable drums once the point of entry has been confirmed (this will most likely be Immingham Port, however this is not confirmed at this current stage). The nature of the delivery is such that an abnormal load will only be required when the transformer is transported to the Principal Site, as the vehicle will be dissembled and take the form of a standard vehicle prior to its departure. A preliminary assessment has been undertaken, which comprises a review of the routing from the A46 to construction access C-009, in order to test the viability of the route, as presented in **Annex C of** the **Framework CTMP [EN010154/APP/7.18]**. Similarly, an assessment of the routing for the cable drums from the A15 has been undertaken to highlight any potential constraints and pinch points along the route.
Paragraph 5.14.15	The Secretary of State 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.	Given the locations of the nearest rail and bus services/ stops to the Proposed Development and considering the public transport timetables in relation to the construction staff working hours, there will be limited opportunity for construction staff to travel to the Principal Site by rail or bus. As stated in the **Framework CTMP**

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		[EN010154/APP/7.18] if there is additional demand for the shuttle bus service, (identified by the monitoring carried out as part of the detailed CTMP (which will be secured through the DCO)) then additional shuttle services will be provided to further reduce the number of construction staff vehicles on the network. This is a cost-effective approach. Nevertheless, sustainable travel will be promoted for usage by construction staff travelling to/ from the Principal Site with further details set out within the **Framework CTMP [EN010154/APP/7.18]**
Paragraph 5.14.16	Applicants should consider the DfT policy guidance "Water Preferred Policy Guidelines for the movement of abnormal indivisible loads" when preparing their application.	While there is no mention of this DfT policy in this DCO application, abnormal indivisible loads have been considered in **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]** and the **Framework CTMP [EN010154/APP/7.18].**
Paragraph 5.14.18	A new energy NSIP may give rise to substantial impacts on the surrounding transport infrastructure and the Secretary of State should therefore ensure that the applicant has sought to mitigate these impacts, including during the construction phase of the development and by enhancing active, public and shared transport provision and accessibility.	Section 13.6 of **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]** confirms the Applicant has implemented mitigation measures to address impacts in relation to transport for the construction phase. These measures are set out within the **Framework CTMP [EN010154/APP/7.18], Framework PRoW-MP [EN010154/APP/7.14].** and **Framework CEMP [EN010154/APP/7.7]** with detailed plans to be provided and secured via Requirements 14, 18, and 12 under Schedule 2 of the **Draft Development Consent Order**

Policy paragraph	Policy description	Compliance commentary
		[EN010154/APP/3.1]. Section 13.8 of **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]** concludes, following the implementation of these embedded mitigation measures there are no significant adverse effects in relation to transport for the construction phase. A **Framework PRoW-MP [EN010154/APP/7.14]** has been prepared as part of the DCO application which details the mitigation measures which will be used to reduce the impacts of the Proposed Development on PRoW. This will be secured via Requirement 18 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1].** As stated in Section 5.3 of the **Planning Statement [EN010154/APP/7.2],** the Proposed Development will also create new permissive paths across the Principal Site. Approximately 9.5km of new permissive paths are proposed to supplement the existing PRoW network, link existing routes and create new and enhance existing connections to surrounding villages. **Figure 3-3: Proposed Permissive Paths** of the ES **[EN010154/APP/6.2]** and Sheets 1-5, 7 and 9 of the **Streets, Right of Way and Access Plans [EN010154/APP/2.3]** show the location of the proposed permissive paths.
Paragraph 5.14.20	Development consent should not be withheld provided that the applicant is willing to enter into planning obligations for funding new infrastructure or requirements	**Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]** sets out that there are no residual

Policy paragraph	Policy description	Compliance commentary
	can be imposed to mitigate transport impacts. In this situation the Secretary of State should apply appropriately limited weight to residual effects on the surrounding transport infrastructure.	significant effects of the Proposed Development on any traffic and transport receptors. It is considered there are no reasons for refusal on highway grounds, with further mitigation measures to reduce impacts provided in the accompanying **Framework CTMP [EN010154/APP/7.18], Framework PRoW-MP [EN010154/APP/7.14]**, **Framework CEMP [EN010154/APP/7.7] Framework DEMP [EN010154/APP/7.9]**, to be secured in detail by Requirements 14, 18, 12 and 20 under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 5.14.21	The Secretary of State should only consider refusing development on highways grounds if there would be an unacceptable impact on highway safety, residual cumulative impacts on the road network would be severe, or it does not show how consideration has been given to the provision of adequate active public or shared transport access and provision.	
Resource and Waste Management		
Paragraph 5.15.6	Applicants must demonstrate that development proposals are in line with Defra's policy position on the role of energy from waste in treating residual waste.	The Proposed Development does not comprise an energy from waste facility.
Paragraph 5.15.8	The applicant should set out the arrangements that are proposed for managing any waste produced and prepare a report that sets out the sustainable management of waste and use of resources throughout any relevant demolition, excavation and construction activities.	The impacts of the Proposed Development in relation to materials and waste will be appropriately controlled through management plans including applying the waste hierarchy and commitment to recycling as set out in the **Framework CEMP [EN010154/APP/7.7] Framework OEMP [EN010154/APP/7.8]** and the **Framework DEMP [EN010154/APP/7.9] and** secured via Requirements 12,13 and 20 under Schedule 2 in the

Policy paragraph	Policy description	Compliance commentary
		Draft Development Consent Order [EN010154/APP/3.1]. **Appendix 14-A Other Environmental Topics Legislation and Policy; and [EN010154/APP/6.3]** contains further details in relation to the consideration of policy associated with the assessment of waste contained within **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]**. This includes consideration of the relevant DEFRA policies. **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** further notes that a Site Waste Management Plan (SWMP) will be prepared in accordance with the **Framework CEMP [EN010154/APP/7.7]** by the construction contractor, with a Materials Management Plan in accordance with the CL: AIRE DoW CoP, exemption or environmental permit, also prepared for excavated material reuse.
Paragraph 5.15.9	The arrangements described and a report setting out the sustainable management of waste and use of resources should include information on how re-use and recycling will be maximised in addition to the proposed waste recovery and disposal system for all waste generated by the development. They should also include an assessment of the impact of the waste arising from development on the capacity of waste management	The Proposed Development has considered the sustainable management of waste and use of resources in accordance with this policy, as set out within **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1].** Section 14.5 details the assessment of waste management facilities and capacity. The commitment of the Applicant to maximise recycling and reuse of the Proposed Development components at

Policy paragraph	Policy description	Compliance commentary
	facilities to deal with other waste arising in the area for at least five years of operation.	the end of their life is set out within the **Framework OEMP [EN010154/APP/7.8]** and **Framework DEMP [EN010154/APP/7.9]**, secured under Requirements 13 and 20 of the **Draft Development Consent Order [EN010154/APP/3.1]**. As stated in Section 14.5 of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** it is likely that the solar PV panels and battery waste generated by the Proposed Development, during the operation and maintenance and decommissioning phases, would be managed by specialist regional or national facilities; these facilities would be developed over the operation and maintenance phase of the Proposed Development in response to demand generated by the UK-wide solar energy industry. The capacity of such facilities is not expected to be influenced by other non-solar farm projects in the surrounding area because the facilities will only be managing specific solar PV panel waste. In addition, private sector waste companies will develop these facilities to respond to market demands. At present, solar PV panel waste generation is low, therefore there is a limited demand for facilities and their associated limited available capacity. It is therefore expected that the facilities which reuse, recycle, or recover end of-life solar PV panels will be developed as the quantities of this waste stream increase. The Waste

Policy paragraph	Policy description	Compliance commentary
		Electrical and Electronic Equipment (WEEE) Regulations and The Waste Batteries and Accumulators (Amendment) Regulations place obligations on those who place solar PV panels and batteries on the market to finance the costs of collection, treatment, recovery and environmentally sound disposal; and the landfill tax strongly incentivise reuse, recycling and recovery.
Paragraph 5.15.10	The applicant is encouraged to refer to the 'Waste Prevention Programme for England', 'Maximising Resources Minimising Waste' and 'Towards Zero Waste: Our Waste Strategy for Wales' and 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.	The legislation, regulations, and policy in relation to waste is set out within **Appendix 14-A: Other Environmental Topics Legislation and Policy [EN010154/APP/6.3].** Measures secured in the **Framework CEMP [EN010154/APP/7.7]** include increasing recyclability by segregating construction waste to be re-used and recycled where reasonably practicable and designing, constructing and implementing the Proposed Development in such a way as to minimise the creation of waste and maximise the use of alternative materials with lower embodied carbon, such as locally sourced products and materials with a higher recycled content where feasible An overarching waste management strategy including applying the waste hierarchy and designing out waste as per circular principles is contained within **Chapter 14: Other Environmental Topics [EN010154/APP/6.1]** with measures set out within the **Framework CEMP [EN010154/APP/7.7]**, **Framework**

Policy paragraph	Policy description	Compliance commentary
		OEMP [EN010154/APP/7.8] and **Framework DEMP [EN010154/APP/7.9]**. Detailed versions of these plans will be provided and secured via Requirements 12, 13, and 20 under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1].**
Paragraph 5.15.11	If the applicant's assessment includes dredged material, the assessment should also include other uses of such material before disposal to sea, for example through re-use in the construction process.	Due to the terrestrial location of the Proposed Development, a dredged materials assessment is not required.
Paragraph 5.15.12	The UK is committed to moving towards a more 'circular economy'. Where possible, applicants are encouraged to source materials from recycled or reused sources and use low carbon materials, sustainable sources and local suppliers. Construction best practices should be used to ensure that material is reused or recycled onsite where possible.	Confirmation of measures to ensure the implementation of construction best practice in relation to waste and resource management is provided within Section 14.5 of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1].** These measures are secured in the **Framework CEMP [EN010154/APP/7.7]** and include increasing recyclability by segregating construction waste to be re-used and recycled where reasonably practicable and designing, constructing and implementing the Proposed Development in such a way as to minimise the creation of waste and maximise the use of alternative materials with lower embodied carbon, such as locally sourced products and materials with a higher recycled content where feasible.
Paragraph 5.15.13	Applicants are also encouraged to use construction best practices in relation to storing materials in an adequate and protected place on site to prevent waste, for	The **Framework CEMP [EN010154/APP/7.7]** sets out that a Site Waste Management Plan will be prepared that considers construction best practices in relation to

Policy paragraph	Policy description	Compliance commentary
	example, from damage or vandalism. The use of Building Information Management tools (or similar) to record the materials used in construction can help to reduce waste in future decommissioning of facilities, by identifying materials that can be recycled or reused.	waste. The production of a Site Waste Management Plan is secured under Requirement 12 in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 5.15.14	The Secretary of State 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.	**Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** provides an assessment of waste, which considers hazardous and non-hazardous waste and concludes that with embedded mitigation measures in place there are no significant impacts arising from hazardous or non-hazardous waste during construction, operation, or decommissioning. All management of waste will be in accordance with the relevant regulations (as outlined in **Appendix 14-A: Other Environmental Topics Legislation and Policy** of the ES**[EN010154/APP/6.3]**) and waste will be transported by licensed waste hauliers to waste management sites which hold the necessary regulatory authorisation and/or permits for those wastes consigned to them. The construction of the Proposed Development will be subject to measures and procedures defined within a CEMP and Site Waste Management Plan (SWMP). The CEMP is secured by Requirement 12 at Schedule 2 to the **Draft Development Consent Order [EN010154/APP/3.1]**, and the SWMP is secured through the CEMP. These plans will include the

Policy paragraph	Policy description	Compliance commentary
		implementation of industry standard and best practice measures and control measures for environmental impacts arising during construction, including the approach for materials and waste management on-site. These measures are set out in the **Framework CEMP [EN010154/APP/7.7]** submitted with the DCO application. The Applicant will use the **Framework CEMP [EN010154/APP/7.7]** as the basis for producing their CEMP and SWMP respectively, prior to works commencing on-site. Any excavated material reuse would be implemented via a Materials Management Plan (if required) in accordance with the CL: AIRE DoW CoP, exemption or environmental permit. The operation of the Proposed Development will be subject to measures and procedures defined within an OEMP secured by Requirement 13 at Schedule 2 to the **Draft Development Consent Order [EN010154/APP/3.1]**. The OEMP will include the implementation of industry standard practice and control measures for environmental impacts arising during operation, such as the approach for materials and waste management on-site. These measures are set out in the **Framework OEMP [EN010154/APP/7.8]** submitted with the DCO application. The Applicant will use the **Framework OEMP [EN010154/APP/7.8]** as the

Policy paragraph	Policy description	Compliance commentary
		basis for producing an OEMP prior to the operation of the Proposed Development. The decommissioning of the Proposed Development will be subject to measures and procedures defined within a DEMP secured by Requirement 20 in the DCO. A **Framework DEMP [EN010154/APP/7.9]** is submitted with the DCO application which includes the approach for materials and waste management on-site. The decommissioning contractor will use the **Framework DEMP [EN010154/APP/7.9]** as the basis for producing a DEMP prior to decommissioning works on-site.
Paragraph 5.15.15	The Secretary of State 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. • 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.	Embedded mitigation measures in the form of industry standard practice and control measures in relation to waste are set out in the **Framework CEMP [EN010154/APP/7.7]**, **Framework OEMP [EN010154/APP/7.8]**, and **Framework DEMP [EN010154/APP/7.9]**. The **Framework CEMP [EN010154/APP/7.7]** includes the production of a Site Waste Management Plan (SWMP) which will be prepared by the Principal Contractor and will provide a waste estimate and specify key responsibilities, reporting and auditing requirements and waste recovery targets. The SWMP will be finalised with specific measures to be implemented prior to the start of construction. These framework plans are secured under Requirements 12,13, and 20 under Schedule 2 of the

Policy paragraph	Policy description	Compliance commentary
		Draft Development Consent Order [EN010154/APP/3.1]. As per paragraph 2.8.3 of the **Framework CEMP [EN010154/APP/7.7]** all waste to be removed from the DCO Site will be undertaken by fully licensed waste carriers and taken to licensed waste facilities and managed in line with the requirements of the Waste (England and Wales) Regulations (2011) and the Hazardous Waste (England and Wales) Regulations. The Proposed Development will apply the waste hierarchy, in priority order; prevention, preparation for reuse, recycled, other recovery and disposal. If required, a Materials Management Plan (MMP) would be developed by the Principal Contractor to support the reuse of excavated materials, minimise off-site disposal; and to demonstrate the necessary lines of evidence to support the proper reuse/offsite disposal of materials and ensure compliance with regulatory guidance. Section 14.5 of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** confirms there are no significant adverse impacts in relation to materials and waste as a result of the Proposed Development.
Paragraph 5.15.16	Where necessary, the Secretary of State should use requirements or obligations to ensure that appropriate measures for waste management are applied.	With the proposed waste management measures in place, additional requirements are not considered necessary. The production of a Site Waste Management Plan is secured within the Framework CEMP, which is

Policy paragraph	Policy description	Compliance commentary
		secured in Requirement 12 under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 5.15.17	The Secretary of State may wish to include a condition on revision of waste management plans at reasonable intervals when giving consent.	This is noted by the Applicant.
Paragraph 5.15.18	Where the project will be subject to the Environmental Permitting regime, waste management arrangements during operations will be covered by the permit and the considerations set out in Section 4.12 will apply.	
Paragraph 5.15.19	The Secretary of State should have regard to any potential impacts on the achievement of resource efficiency and waste reduction targets set under the Environment Act 2021 or wider goals set out in the government's Environmental Improvement Plan 2023.	Measures to reduce waste through reuse and recycling during construction, operation and decommissioning are set out in the **Framework CEMP [EN010154/APP/7.7]**, **Framework OEMP [EN010154/APP/7.8]**, and **Framework DEMP [EN010154/APP/7.9]**. As outlined in Waste Targets in **Appendix 14-E: Materials and Waste Impact Assessment Methodology and Baseline** of the ES **[EN010154/APP/6.3]**, the national waste recovery target is 70% and was exceeded in 2022 in England at 94.3% (most recent year for which data is available). Therefore, a recovery rate of 70% is assumed to be achievable for the purpose of the waste assessment.

Policy paragraph	Policy description	Compliance commentary
		As stated in Section 14.5 of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** a Site Waste Management Plan (SWMP) will be prepared by the Principal Contractor as part of the detailed CEMP to be produced. This will provide a waste estimate and specify key responsibilities (e.g. applying the waste hierarchy, waste classification and waste duty of care), reporting and auditing requirements and waste recovery targets.
Water Quality and Resources		
Paragraph 5.16.3	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, and how this might change due to the impact of climate change on rainfall patterns and consequently water availability across the water environment, as part of the ES or equivalent (see Section 4.3 and 4.10)	Sections 9.5 and 9.7 of **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]** present an assessment of the potential impacts and effects of the construction, operation, and decommissioning phases of the Proposed Development on surface water features (rivers, streams, ditches, canals, ponds, and lakes) including water quality and hydromorphology, flood risk and drainage. Climate change, including precipitation, has been taken into account in this chapter and **Appendix 9-C: Flood Risk Assessment** of the ES **[EN010154/APP/6.3].** Drainage, including quantity and quality has been assessed. This has been taken into account in **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]** and **Appendix 9-D: Framework Surface Water Drainage Strategy [EN010154/APP/6.3]. Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]** concludes that following

Policy paragraph	Policy description	Compliance commentary
		the implementation of standard and embedded mitigation, there are no likely significant effects resulting from the construction, operation or decommissioning of the Proposed Development.
Paragraph 5.16.4	The applicant should make early contact with the relevant regulators, including the local authority, the Environment Agency and Marine Management Organisation, where appropriate, for relevant licensing and environmental permitting requirements.	The Applicant has made early contact with the relevant regulators. Section 9.3 of **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]** details that engagement has been undertaken with the Environment Agency and relevant regulators. Further details are provided in the accompanying **Consultation Report [EN010154/APP/5.1]**.
Paragraph 5.16.5	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.	Surface water is considered within **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]** with mitigation measures including the use of SuDS outlined through **Appendix 9-D: Framework Surface Water Drainage Strategy [EN010154/APP/6.3].** Measures also include attenuation of surface water runoff from the Proposed Development, whilst minimising flood risk to the Proposed Development and surrounding areas. Furthermore, runoff from the Proposed Development will be attenuated to ensure no increase in surface water discharge rates and to provide water quality treatment of runoff water. Additional embedded mitigation measures such as planting to intercept and absorb rainfall running off the panels, preventing it from concentrating and potentially
Paragraph 5.16.6	Applicants are encouraged to consider protective measures to control the risk of pollution to groundwater beyond those outlined in River Basin Management Plans and Groundwater Protection Zones - this could include, for example, the use of protective barriers	

Policy paragraph	Policy description	Compliance commentary
		forming channels in the ground, are contained with the **Framework LEMP [EN010154/APP/7.15]** and measures in relation to fire water runoff are detailed within the **Framework BSMP [EN010154/APP/7.17]** both to be secured in detail by Requirements 8 and 7 under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1].** Measures include ensuring that firewater run-off is contained and tested before release or, if necessary, removed by tanker and treated offsite. **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]** considers pollution risks in relation the water environment. Section 9.6 details the embedded mitigation measures which manage pollution risk to ensure no significant effects are identified for any phase of the Proposed Development. These measures alongside best practice control measures are detailed within the **Framework CEMP [EN010154/APP/7.7], Framework DEMP [EN010154/APP/7.9],** and **Framework OEMP [EN010154/APP/7.8]**. To note, once the detailed CEMP is produced, which will be secured by Requirement 12 under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**, it will be supported by a Water Management Plan (WMP). The potential for adverse impacts would be minimised by the adoption of the general mitigation measures described within the WMP.

Policy paragraph	Policy description	Compliance commentary
Paragraph 5.16.7	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 Abstraction Licensing 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 baseline conditions with regard to the water environment are assessed within Section 9.5 of **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]**. The existing baseline considers the topography, land use, and climate, of both the Principal Site and Cable Corridor, and assesses surface water features, hydrology, and water quality. This includes aquatic ecology, nature conservation sites, geology and soils, groundwater, water resources, and flood risk for all sources. A cumulative assessment is provided within Section 9.10 of **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]**. The impacts of climate change are considered within the assessment and all mitigation measures proposed. The chapter is supported by: a. **Appendix 9-C: Flood Risk Assessment [EN010154/APP/6.3]** which assess current and future flood risk to the Proposed Development from all sources; and b. **Appendix 9-B: Water Framework Directive Assessment [EN010154/APP/6.3]**, which assess the impacts of the Proposed Development on

Policy paragraph	Policy description	Compliance commentary
	• how climate change could impact any of the above in the future • any cumulative effects	water bodies or protected areas under the Water Framework Directive (WFD). Section 9.9 of **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]** concludes that following the implementation of standard and embedded mitigation, there are no likely significant effects resulting from the construction, operation or decommissioning of the Proposed Development.
Paragraph 5.16.8	The Secretary of State should consider whether mitigation measures are needed over and above any which may form part of the project application. A construction management plan may help codify mitigation at that stage	Sections 9.6 and 9.8 of **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]** details the mitigation measures implemented in relation to the water environment, which result in no significant effects being identified as a result of the Proposed Development. Where appropriate, these measures are provided in the **Framework CEMP [EN010154/APP/7.7]** with a detailed version of the plan to be secured via Requirement 12 under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 5.16.9	The risk of impacts on the water environment can be reduced through careful design to facilitate adherence to good pollution control practice. For example, designated areas for storage and unloading, with appropriate drainage facilities, should be clearly marked.	Measures to address impacts to the water environment during construction are set out in the **Framework CEMP [EN010154/APP/7.7]** including trenchless crossings of the River Witham and River Brant using a horizontal directional drill technique. The **Framework CEMP [EN010154/APP/7.7]** sets out that a Water Management Plan (to be produced post-consent) will set out details of water quality monitoring to be undertaken during construction. Furthermore, the
Paragraph 5.16.10	The impact on local water resources can be minimised through planning and design for the efficient use of water, including water recycling. If a development needs new	

Policy paragraph	Policy description	Compliance commentary
	water infrastructure, significant supplies or impacts other water supplies, the applicant should consult with the local water company and the EA or NRW.	**Framework DEMP [EN010154/APP/7.9]** also includes measures to prevent pollution and flooding during the decommissioning phase. A Water Resources Assessment was submitted to Anglian Water outlining water requirements for the Proposed Development. Anglian Water confirmed on 28 May 2025 that they are able to meet all of the Proposed Development's requirements during construction and during operation.
Paragraph 5.16.12	The Secretary of State will 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 Environment (Water Framework Directive) (England and Wales) Regulations 2017.	**Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]** confirms that, following the implementation of embedded mitigation measures, there are no significant adverse effects in relation to the water environment. Section 9.2 of **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1],** confirms the consideration of the WFD in the assessment of the water environment. Full details of the WFD assessment are provided within **Appendix 9-B: Water Framework Directive Assessment [EN010154/APP/6.3]** in which outlines the assessment demonstrates that the Proposed Development is compliant with the objectives of the WFD; it would not cause deterioration in status of the water bodies and would not prevent the water bodies achieving Good Ecological Status and Good Ecological Potential. It adds that the Proposed Development would

Policy paragraph	Policy description	Compliance commentary
		not prevent the achievement of the wider WFD objectives in the Anglian River Basin Management Plan (RBMP) or Humber RBMP and is not predicted to have an impact on any other water body within the Humber or Anglian River Basin District (RBD) or the mitigation measures developed to achieve Good status.
Paragraph 5.16.16	The Secretary of State should consider proposals to mitigate adverse effects on the water environment and any enhancement measures put forward by the applicant and whether appropriate requirements should be attached to any development consent and/or planning obligations are necessary.	As confirmed in Section 9.9 of **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]**, following the implementation of embedded mitigation measures there are no significant adverse effects in relation to the water environment. Mitigation measures are set out within the **Framework CEMP [EN010154/APP/7.7], Framework LEMP [EN010154/APP/7.15], Framework BSMP [EN010154/APP/7.17], Framework OEMP [EN010154/APP/7.8],** and **Framework DEMP [EN010154/APP/7.9]** with the construction of the Proposed Development to be undertaken in accordance with good practice. Measures include but are not limited to the management of flood risk, spillage risk, and surface water. These Plans will be secured in detail by Requirements 12, 8, 7, 13 and 20 under Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.

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Policy paragraph	Policy description	Compliance commentary
Climate Change Adaption		
Paragraph 2.4.11	Solar photovoltaic (PV) sites may also be proposed in low lying exposed sites. For these proposals, applicants should consider, in particular, how plant will be resilient to: • increased risk of flooding; and • impact of higher temperatures.	The Proposed Development has considered the site in detail, the **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]** sets out the potential sites that were considered, and how they were assessed against a range of planning, environmental (including flood risk), and operational criteria in order to identify a suitable location for a generating station with capacity more than 50MW.
Good Design		
Paragraph 2.5.2	Proposals for renewable energy infrastructure should demonstrate good design, particularly in respect of landscape and visual amenity, opportunities for co-existence/co-location with other marine and terrestrial uses, and in the design of the project to mitigate impacts such as noise and effects on ecology and heritage.	The design of the Proposed Development follows a clear framework based on good design criteria from Paragraphs 4.7.5 to 4.7.9 of NPS EN-1 and the Planning Inspectorate's Advice on Good Design. It also incorporates advice from the NPS, NPPF, local planning policy, and design guidance, using project-level principles to ensure good design outcomes. As set out in Section 6 of the **Design Approach Document [EN010154/APP/7.3]**, the design of the Proposed Development submitted as part of this DCO application is considered to respond to the Design Principles, resulting in a good quality design.

Policy paragraph	Policy description	Compliance commentary
Flexibility		
Paragraph 2.6.1	Where details are still to be finalised applicants should explain in the application which elements of the proposal have yet to be finalised, and the reason why this is the case	The design of the Proposed Development includes some flexibility as the technology for solar PV and BESS continues to evolve rapidly; for example, solar PV panels are becoming increasingly powerful year on year and better at minimising shading losses, which affects how developers space the rows of solar PV and the amount of land needed to achieve the proposed export capacity. To ensure a robust assessment of the likely significant environmental effects, the Environmental Impact Assessment (EIA) has been undertaken adopting the principles of the 'Rochdale Envelope', which involves assessing the maximum (and where relevant, minimum) parameters, including the limits of deviation (e.g., development extents or specific maximum heights) as relevant, for the Proposed Development where flexibility needs to be retained. Where this approach is applied to the specific aspects of the EIA, this has been confirmed within the relevant chapters of the ES (**Chapters 6–14**, **[EN010154/APP/6.1]**). This approach sets worst-case parameters for the purpose of the assessment but does not constrain the Proposed Development from being built in a manner that would lead to lesser environmental and social impacts. The use of 'design parameters' is therefore adopted to present a likely worst-case assessment of potential environmental effects of elements of the Proposed Development that require flexibility.
Paragraph 2.6.2	Where flexibility is sought in the consent as a result, applicants should, to the best of their knowledge, assess the likely worst-case environmental, social and economic effects of the proposed development to ensure that the impacts of the project as it may be constructed have been properly assessed	

Policy paragraph	Policy description	Compliance commentary
		As a result, the design parameters of the Proposed Development maintain a degree of flexibility to allow the most appropriate technology to be utilised at the time of construction. These design elements are set out in the **Proposed Development Parameters [EN010154/APP/7.4]** and will be confirmed at the detailed design stage through discharge of Requirement 6 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. Section 3.3 of **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]** contains further detail on the energy infrastructure and technology.
Need/Principle		
Paragraph 2.10.9	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 by 2050. As such, solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector.	Section 5 of the **Planning Statement [EN010154/APP/7.2]** and the **Statement of Need [EN010154/APP/7.1]** set out the comprehensive need for the Proposed Development. The Proposed Development is defined as CNP infrastructure (as per Paragraph 4.2.5 of NPS EN-1) and in summary, the Proposed Development will provide a significant amount of low carbon electricity over its 60-year lifetime, supporting resilience, security, and affordability of electricity supplies. It would be a critical part of the national portfolio of renewable energy generation that is required to decarbonise UK energy supply quickly.
Paragraph 2.10.10	Solar also has an important role in delivering the government's goals for greater energy independence and the British Energy Security Strategy states that government expects a five-fold increase in combined ground and rooftop solar deployment by 2035 (up to 70GW). It sets out that government is supportive of solar that is "co-located with other functions (for	

Policy paragraph	Policy description	Compliance commentary
	example, agriculture, onshore wind generation, or storage) to maximise the efficiency of land use".	
Paragraph 2.10.11	The Powering Up Britain: Energy Security Plan states that government seeks large scale ground-mount solar deployment across the UK, looking for development mainly on brownfield, industrial and low and medium grade agricultural land. It sets out that solar and farming can be complementary, supporting each other financially, environmentally and through shared use of land and encourages deployment of solar technology that delivers environmental benefits, with consideration for ongoing food production or environmental improvement.	
Paragraph 2.10.13	Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation.	
Paragraph 2.10.14	Solar farms can be built quickly and, coupled with consistent reductions in the cost of materials and improvements in the efficiency of panels, large-scale solar is now viable in some cases to deploy subsidy-free.	
Paragraph 2.10.15	Solar farm proposals are currently likely to consist of solar panel arrays, mounting structures, piles, inverters, transformers and cables	**Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]** describes all elements of the Proposed Development to be included as the authorised development as part of Schedule 1 of the **Draft Development Consent Order [EN010154/APP/3.1]**. The authorised development, and any associated development,
Paragraph 2.10.16	Associated infrastructure may also be proposed and may be treated, on a case by case basis as associated development, such as energy storage,	

Policy paragraph	Policy description	Compliance commentary
	electrolysers associated with the production of low carbon hydrogen, or security arrangements (which may encompass flood defences, fencing, lighting and surveillance).	is also explained in the **Explanatory Memorandum [EN010154/APP/3.2]**. This includes the associated development which is discussed in Section 2.2 of the **Planning Statement [EN010154/APP/7.2]** and shown on the **Works Plans [EN010154/APP/2.2]**.
Paragraph 2.10.17	Along with associated infrastructure, a solar farm requires between 2 to 4 acres for each MW of output. A typical 50MW solar farm will consist of around 100,000 to 150,000 panels and cover between 125 to 200 acres. However, this will vary significantly depending on the site, with some being larger and some being smaller. This is also expected to change over time as the technology continues to evolve to become more efficient. Nevertheless, this scale of development will inevitably have impacts, particularly if sited in rural areas.	The site selection process is detailed in **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]** which sets out the sites that were considered and assessed against a range of planning, environmental, and operational criteria. It is acknowledged, as the policy suggests, the *"scale of development will inevitably have impacts"* and these are captured and reported on throughout the accompanying **ES [EN010154/APP/6.1]**.
Paragraph 2.10.18	The key considerations involved in the siting of a solar farm are likely to be influenced by factors set out in the following paragraphs, in addition to considerations specific to individual projects.	The key considerations were considered and are described in **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]**.
Irradiance and site Topography		
Paragraph 2.10.19	Irradiance will be a key consideration for the applicant in identifying a potential site as the amount of electricity generated on site is directly affected by irradiance levels. Irradiance of a site will in turn be	The Applicant concurs and understands that large-scale solar developments require relatively flat land as this is ideal for construction and helps reduce visual impact. Flat land

Policy paragraph	Policy description	Compliance commentary
	affected by surrounding topography, with an uncovered or exposed site of good elevation and favourable south-facing aspect more likely to increase year-round irradiance levels. This in turn affects the carbon emission savings and the commercial viability of the site.	also limits the shading between arrays and enables the panels to be configured for higher energy production levels. Irradiance and site topography were considered in the site selection for the Proposed Development, which has a relatively low lying and flat landscape (less than 3% gradient).
Paragraph 2.10.20	In order to maximise irradiance, applicants may choose a site and design its layout with variable and diverse panel types and aspects, and panel arrays may also follow the movement of the sun in order to further maximise the solar resource.	Further detail can be found in **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]**. Flexibility is built into the Proposed Development, and the design parameters maintain some degree of flexibility to allow the most appropriate technology to be utilised at the time of construction. These design elements are set out in the **Proposed Development Parameters [EN010154/APP/7.4]** and will be confirmed at the detailed design stage through discharge of Requirement 6 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Network Connection		
Paragraph 2.10.21	Applicants should consider important issues relating to network connection at Section 4.11 of EN-1 and in EN-5. In particular, and where appropriate, applicants should proceed in a manner consistent with the regulatory regime for offshore transmission networks established by Ofgem, details of which are set out in EN-5.	The Applicant has considered the network connection as part of the design of the Proposed Development including the constraints of the grid connection and the length of the cable route to the point of connection. Further detail can be found in **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]**.

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Paragraph 2.10.22	Many solar farms are connected into the local distribution network. The capacity of the local grid network to accept the likely output from a proposed solar farm is critical to the technical and commercial feasibility of a development proposal.	The Proposed Development will connect to the national electricity transmission network at the proposed National Grid substation near Navenby. Please see the **Grid Connection Statement [EN010154/APP/7.5]** for more detail. The proposed National Grid substation near Navenby is subject to a separate planning application by National Grid (not submitted at the time of writing) and does not form part of the Proposed Development. Cumulative effects of the Proposed Development are considered in **Chapter 15: Cumulative Effects and Interactions** of the ES **[EN010154/APP/6.1]**.
Paragraph 2.10.25	To maximise existing grid infrastructure, minimise disruption to existing local community infrastructure or biodiversity and reduce overall costs applicants may choose a site based on nearby available grid export capacity.	
Paragraph 2.10.26	Where this is the case, applicants should consider the cumulative impacts of situating a solar farm in proximity to other energy generating stations and infrastructure.	
Proximity to Dwellings		
Paragraph 2.10.27	Utility-scale solar farms are large sites that may have a significant zone of visual influence. The two main impact issues that determine distances to sensitive receptors are therefore likely to be visual amenity and glint and glare. These are considered in Landscape, Visual and Residential Amenity (paragraphs 2.10.84-2.10.92) and Glint and Glare (paragraphs 2.10.93 – 2.10.97) impact sections below.	**Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** sets out in Section 10.5 the visual receptors likely to experience views of the construction or operation of the DCO Site, including residents, recreational users on PRoW, promoted Walking Routes and Cycle Routes, people travelling on roads, and commercial users. A Glint and Glare Assessment has also been undertaken and is included in Section 14.3 of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]**.
Agriculture and Land Classification		

Policy paragraph	Policy description	Compliance commentary
Paragraph 2.10.28	Solar is a highly flexible technology and as such can be deployed on a wide variety of land types.	Agricultural land was considered in site selection process as detailed in **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]** with the initial search focussed on non-Best and Most Versatile (BMV) land. Due to the scale of the Proposed Development, which seeks to maximise renewable energy generation, there is some BMV agricultural land within the Order Limits, however, this is acknowledged by Paragraph 2.10.31 of NPS EN-3 which states *"it is recognised that at this scale, it is likely that applicants' developments will use some agricultural land"*. Use of BMV agricultural land has been minimised through careful design, which has taken account of the results of the detailed study of the agricultural land quality, at **Appendix 12-B: Agricultural Land Classification Report** of the ES **[EN010154/APP/6.3]**. In the case of the Proposed Development, as outlined in Section 12.5 of **Chapter 12: Socio-Economics and Land Use** of the ES **[EN010154/APP/6.1]**, there is no Grade 1 or 2 agricultural land within the Principal Site, with approximately 27.8% Subgrade 3a and 68.9% Subgrade 3b (non-BMV).
Paragraph 2.10.29	While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land (avoiding the use of "Best and Most Versatile" agricultural land where possible). 'Best and Most Versatile agricultural land is defined as land in grades 1, 2 and 3a of the Agricultural Land Classification.	
Paragraph 2.10.30	Whilst the development of ground mounted solar arrays is not prohibited on Best and Most Versatile agricultural land, or sites designated for their natural beauty, or recognised for ecological or archaeological importance, the impacts of such are expected to be considered and are discussed under paragraphs 2.10.73 – 92 and 2.10.107 – 2.10.126.	
Paragraph 2.10.31	It is recognised that at this scale, it is likely that applicants' developments will use some agricultural land. Applicants should explain their choice of site, noting the preference for development to be on suitable brownfield, industrial and low and medium grade agricultural land.	

Policy paragraph	Policy description	Compliance commentary
Paragraph 2.10.32	Where sited on agricultural land, consideration may be given as to whether the proposal allows for continued agricultural use and/or can be co-located with other functions (for example, onshore wind generation, storage, hydrogen electrolysers) to maximise the efficiency of land use.	Consideration has been given to continuing existing agricultural uses, as detailed in the **Design Approach Document [EN010154/APP/7.3]**. The managed arable land would be rotated within the areas of the Order Limits where there is no solar PV infrastructure and the fields will continue to be used for maize, barley or wheat, as well as providing mitigation for the reversible long-term loss of arable farmland for ground nesting birds. The locations of these areas are illustrated in **Figure 8-5: Bird Mitigation Land Allocation** of this ES **[EN010154/APP/6.2]**. This demonstrates how the Proposed Development has sought to co-exist with existing land uses, ensuring the continuation of current farming practices.
Paragraph 2.10.33	The Agricultural Land Classification (ALC) is the only approved system for grading agricultural quality in England and Wales and, if necessary, field surveys should be used to establish the ALC grades in accordance with the current, or any successor to it, grading criteria and identify the soil types to inform soil management at the construction, operation, and decommissioning phases in line with the Defra Construction Code.	Field surveys have been carried out for the Proposed Development and detail can be found in **Appendix 12-B: Agricultural Land Classification Report** of the ES **[EN010154/APP/6.3]** and the reporting of the results in Section 12.5 of **Chapter 12: Socio-Economics and Land Use** of the ES **[EN010154/APP/6.1]**.
Paragraph 2.10.34	Applicants are encouraged to develop and implement a Soil Resources and Management Plan which could help to use and manage soils sustainably and minimise adverse impacts on soil health and potential land contamination. This should be in line with the	A **Framework Soil Management Plan** (SMP**) [EN010154/APP/7.10]** has been prepared as part of the Application. A detailed SMP is to be secured under Requirement 15 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1].**

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	ambition set out in the Environmental Improvement Plan to bring at least 40% of England's agricultural soils into sustainable management by 2028 and increase this up to 60% by 2030.	The SMP will include: a. Areas of soil to be protected from earthworks and construction activities; b. Areas and types of topsoil/subsoil to be stripped, haulage routes and stockpile locations; c. Methods for stripping, stockpiling, respreading and ameliorating landscape soils. The construction phase objectives are to: a. Avoid reducing soil quality due to mixing soil types (limits options for allocation); b. Avoid contamination with construction waste; c. Avoid damaging through compaction or any loss of soils due to poor handling, haulage and stockpiling methodology; d. Avoid contaminating soil as a result of accidental spillage; and e. Avoid loss of soils due to erosion.
Paragraph 2.10.145	Factors influencing site selection and design The Secretary of State should take into account the economic and other benefits of the best and most versatile agricultural land. The Secretary of State should ensure that the applicant has put forward appropriate mitigation measures to minimise impacts on soils or soil resources.	The Proposed Development has been designed to take into account sensitive receptors, such as by positioning the above ground infrastructure to avoid BMV land as far as practicable. Further information on the process is set out in **Chapter 4: Alternatives and Design Evolution** of the ES **[EN010154/APP/6.1]**.

Policy paragraph	Policy description	Compliance commentary
		These measures have been incorporated in each stage of the design of the Proposed Development as demonstrated in **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]. T**he **Framework SMP [EN010154/APP/7.10]** which includes further mitigation measures for soils to be secured under Requirement 15 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Accessibility		
Paragraph 2.10.35	Applicants will need to consider the suitability of the access routes to the proposed site for both the construction and operation of the solar farm with the former likely to raise more issues.	As described in **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]**, access for construction traffic has been a key consideration as part of the Proposed Development's site selection. This includes looking at the general suitability of the public highway, distance to the primary road network, sensitivity of land uses along the route to the primary road network, physical or engineering constraints (bridges, level crossings, visibility, access points etc.) and access to fields without having to remove hedgerows where possible. A full Traffic and Transport assessment of the Proposed Development is provided in **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]**. It is supported by a **Framework Construction Traffic Management Plan** (CTMP) **[EN010154/APP/7.18]** which sets out the Applicant's proposals to manage construction traffic and staff vehicles within the vicinity of the Proposed Development along the local highway network during the
Paragraph 2.10.36	Given that potential solar farm sites are largely in rural areas, access for the delivery of solar arrays and associated infrastructure during construction can be a significant consideration for solar farm siting	
Paragraph 2.10.37	Developers will usually need to construct on-site access routes for operation and maintenance activities, such as footpaths, earthworks, or landscaping.	
Paragraph 2.10.38	In addition, sometimes access routes will need to be constructed to connect solar farms to the public road network.	
Paragraph 2.10.39	Applications should include the full extent of the access routes necessary for operation and maintenance and an assessment of their effects.	

Policy paragraph	Policy description	Compliance commentary
		peak construction period of the works, in order to limit any potential disruptions and implications on the wider transport network. It identifies the management of freight, construction traffic i.e. Heavy Goods Vehicles (HGVs), Light Goods Vehicles (LGVs) as well as staff (construction worker) trips. Construction HGVs will travel to/from the Principal Site primarily via the A46 and will then utilise the local highway network to reach the access points. The routing strategy reflects the most suitable routes available. Local highway improvements (e.g. verge clearance, hedge cutting and/ or local carriageway realignment) will be carried out at each site access where required and a 6.0m carriageway width will be provided along internal construction routes for HGVs. The **Framework CTMP [EN010154/APP/7.18]** has been informed by consultation with Lincolnshire County Council (LCC) as the local highway authority and National Highways who manage the Strategic Road Network, as well as North Kesteven District Council (NKDC). The **Framework CTMP [EN010154/APP/7.18]** sets out the principles that will be adhered to in the detailed CTMP, which will be secured under Requirement 14 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
PRoW		

Policy paragraph	Policy description	Compliance commentary
Paragraph 2.10.40	Proposed developments may affect the provision of public rights of way networks.	As set out in Section 12.6 of **Chapter 12: Socio-Economics and Land Use** of the ES **[EN010154/APP/6.1]**, the design of the Proposed Development has included mitigation measures to avoid closure of PRoW and existing permissive paths and keep any PRoW diversions as localised as reasonably practicable, with additional permissive paths proposed to further enhance local connectivity. Included with the Application is a **Framework Public Rights of Way Management Plan** (PRoW-MP) **[EN010154/APP/7.14]** which outlines how PRoWs will be managed to ensure they have been suitably considered and will continue to operate effectively throughout the Proposed Development's construction, operation, and decommissioning. The report reviews both user safety and accessibility, during the complete life-cycle of the Proposed Development, considering the potential interaction and impact on the PRoW associated with works and day-to-day functioning of the Proposed Development. A detailed PRoW Plan is to be secured under Requirement 18 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 2.10.41	Public rights of way may need to be temporarily closed or diverted to enable construction, however, applicants should keep, as far as is practicable and safe, all public rights of way that cross the proposed development site open during construction and protect users where a public right of way borders or crosses the site.	
Paragraph 2.10.42	Applicants are encouraged to design the layout and appearance of the site to ensure continued recreational use of public rights of way, where possible during construction, and in particular during operation of the site.	
Paragraph 2.10.43	Applicants are encouraged where possible to minimise the visual impacts of the development for those using existing public rights of way, considering the impacts this may have on any other visual amenities in the surrounding landscape.	Visual impacts on the PRoW network have been considered in **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]**.

Policy paragraph	Policy description	Compliance commentary
		The siting of solar PV panels and associated infrastructure seeks to minimise instances of development on both sides of PRoW. Where development is proposed adjacent to a PRoW, an offset of a minimum of 10m either side of the centre line has been incorporated. Where development is proposed on both sides of a PRoW, sections of wider offsets have also been integrated to avoid a 'canyon effect' and vary the extent of views experienced across the Principal Site where practicable. This is provided for as a Design Commitment set out in **Appendix A: Design Commitments** of the **Design Approach Document [EN010154/APP/7.3]** which are secured under Requirement 6 (detailed design approval) of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 2.10.44	Applicants should consider and maximise opportunities to facilitate enhancements to the public rights of way and the inclusion, through site layout and design of access, of new opportunities for the public to access and cross proposed solar development sites (whether via the adoption of new public rights of way or the creation of permissive paths), taking into account, where appropriate, the views of landowners.	As described in Section 5.3 of this **Planning Statement [EN010154/APP/7.2]**, the Proposed Development seeks to create permissive paths within the Principal Site and details relating to permissive paths during the operational phase are provided within the **Framework Operational Environmental Management Plan** (OEMP) **[EN010154/APP/7.8]** and are also shown on the Proposed Permissive Path Plan, **Figure 3-3: Proposed Permissive Paths** of the ES **[EN010154/APP/6.2]**. Requirement 17 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]** states that 'prior to the construction of a permissive path, the undertaker must submit details of that permissive path to the relevant planning authority'.

Policy paragraph	Policy description	Compliance commentary
		These will help create greater accessibility and connectivity to the area.
Paragraph 2.10.45	Applicants should set out detail on how public rights of way would be managed to ensure they are safe to use in an outline Public Rights of Way Management Plan.	As set out in the **Framework PRoW-MP [EN010154/APP/7.14],** the key aim of the document is to maintain public safety while minimising disruption to users. This plan will be secured in detail under Requirement 18 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Security and Lighting		
Paragraph 2.10.46	Security of the site is a key consideration for developers. Applicants may wish to consider not only the availability of natural defences such as steep gradients, hedging and rivers but also perimeter security measures such as fencing, electronic security, CCTV and lighting, with the measures proposed on a site-specific basis.	As described in Section 3.3 of **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]**, the Proposed Development comprises fencing and security. A fence will enclose the operational areas of the Proposed Development – the Solar PV Array Areas, the Onsite Substation, and the centralised BESS Compound. The fence is likely to be a stock proof mesh-type security fence with wooden posts and up to 2m in height. The final details of the fencing are to be secured under Requirement 9 (Fencing and other means of enclosure) of Schedule 2 to the **Draft Development Consent Order [EN010154/APP/3.1].**
Paragraph 2.10.47	Applicants should assess the visual impact of these security measures, as well as the impacts on local residents, including for example issues relating to intrusion from CCTV and light pollution in the vicinity of the site.	
Paragraph 2.10.48	Applicants should consider the need to minimise the impact on the landscape and the visual impact of security measures	Pole mounted inward facing closed circuit television (CCTV) systems installed at a height of up to 3.5m are also likely to be deployed around the perimeter of the operational areas facing along the fence line and into the Principal Site.

Policy paragraph	Policy description	Compliance commentary
		Lighting sensors for security purposes would be implemented on other critical electrical infrastructure. No areas are proposed to be permanently lit. The design has sought to minimise the impact whilst recognising the need for safety on the DCO Site. The visual impacts have been considered in **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]**. Detail on security for the Proposed Development is set out in the **Framework CEMP [EN010154/APP/7.7]**, **Framework OEMP [EN010154/APP/7.8],** and **Framework Decommissioning Environmental Management Plan** (DEMP) **[EN010154/APP/7.9]**. These will be secured in detail under Requirements 12, 13 and 20 respectively of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1].**
Technical considerations		
Paragraph 2.10.49	Applications for solar farms are likely to comprise a number of elements including solar panel arrays, piling, inverters, mounting structures, cabling, earthworks, and measures associated with site security, and may also include associated infrastructure such as energy storage and electrolysers associated with the production of low carbon hydrogen.	The Proposed Development is described in **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]** and shown spatially on the **Work Plans [EN010154/APP/2.2]**. The **Proposed Development Parameters [EN010154/APP/7.4]** sets out the detail of the components of the Proposed Development. The authorised development is set out in Schedule 1 of the **Draft Development Consent Order [EN010154/APP/3.1]**. Work Nos. 2 to 9 comprise associated development in accordance with the DCLG

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		guidance and within the provisions of Section 115(2) of the PA 2008, as explained in the **Explanatory Memorandum [EN010154/APP/3.2]**.
Paragraph 2.10.50	Solar panels generate electricity in direct current (DC) form. A number of panels feed an external inverter, which is used to convert the electricity to alternating current (AC). After inversion a transformer will step-up the voltage for export to the grid. Because the inverter is separate from the panels, the total capacity of a solar farm can be measured either in terms of the combined capacity of installed solar panels (measured in DC) or in terms of combined capacity of installed inverters (measured in AC).	The Proposed Development is described in **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]** and the components in Section 3.3 of the Chapter. The Proposed Development will require approximately 168 central inverters (i.e., two at each Solar Station), each measuring up to 6m x 2.5m and up to 3m in height. Each PV panel of the Proposed Development would likely have a DC generating capacity of between 600 and 850 watts (W), or potentially more depending on advances in technology at the time of construction. The electricity generated by the Proposed Development is expected to be exported via a 400kV Grid Connection Cable between the Onsite Substation and a new proposed National Grid substation near Navenby (not part of this DCO application). The grid connection offer (a Bilateral Connection Agreement (BCA)) to the Applicant was originally received on 09 September 2022 and this was accepted by the Applicant. Full details on this are provided in the **Grid Connection Statement [EN010154/APP/7.5]**.
Paragraph 2.10.51	For the purposes of determining the capacity thresholds in Section 15 of the 2008 Act, all forms of generation other than solar are currently assessed on an AC basis, while a practice has developed where solar farms are assessed on their DC capacity	
Paragraph 2.10.52	Having reviewed this matter, the Secretary of State is now content that this disparity should end, particularly as electricity from some other forms of generation is switched between DC and AC within a generator before it is measured.	
Paragraph 2.10.53	From the date of designation of this NPS, for the purposes of Section 15 of the Planning Act 2008, the maximum combined capacity of the installed inverters (measured in alternating current (AC))	

Policy paragraph	Policy description	Compliance commentary
	should be used for the purposes of determining solar site capacity.	
Paragraph 2.10.55	The installed generating capacity of a solar farm will decline over time in correlation with the reduction in panel array efficiency. There is a range of sources of degradation that developers need to consider when deciding on a solar panel technology to be used. Applicants may account for this by overplanting solar panel arrays.	The **Statement of Need [EN0101054/APP/7.1]** explains that the Proposed Development will have an overplanting ratio of up to 1.6 for fixed south facing PV arrays. This means that for an indicative grid connection capacity of 240MWac, the Proposed Development with fixed south facing arrays would have an installed capacity of 384MWdc. The ratio is likely to be 1.33 for a single axis tracker arrangement, equating to approximately 319MWdc peak generation for a 240MWac export capacity. There are a number of reasons why a PV installation may benefit from overplanting to this extent, in addition to compensating for a loss of generation capacity due to PV module degradation over time. One key reason is that the generation profile for a solar installation means that overplanting makes much better use of the grid connection and transmission infrastructure. It would have a substantially higher output over the course of a day than would be the case for an installation with the same grid connection that was not overplanted. An April 2025 High Court ruling in the case of Ross v Secretary of State for Housing, Communities and Local Government and Renewable Energy Systems Ltd [2025] EWHC 1183 (Admin), concluded that overplanting of solar farms was justified for reasons not only of offsetting panel

Policy paragraph	Policy description	Compliance commentary
		degradation over time but also to account for real-world performance vs. lab-rated capacity, and to maximise energy export to the grid during peak sunlight hours. The ruling further concluded that a potential loss of energy due to clipping (when generation exceeds grid connection capacity) is not a material planning issue.
Paragraph 2.10.56	AC installed export capacity should not be seen as an appropriate tool to constrain the impacts of a solar farm. Applicants should use other measurements, such as panel size, total area and percentage of ground cover to set the maximum extent of development when determining the planning impacts of an application.	As described in Sections 3.2 of **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]**, to ensure a robust assessment of the likely significant environmental effects, the Environmental Impact Assessment (EIA) has been undertaken adopting the principles of the 'Rochdale Envelope' which involves assessing the maximum (and where relevant, minimum) parameters, including the limits of deviation (e.g., development extents or specific maximum heights) as relevant, for the Proposed Development where flexibility needs to be retained. By requiring that the detailed design of the Proposed Development must be in substantial accordance with the development parameters, the environmental effects will be the same as or no worse than those assessed and reported in the ES. This is based on the parameters of the components and not the installed capacity. The **Proposed Development Parameters [EN010154/APP/7.4]** sets out the details of the components of the Proposed Development.
Site layout design and appearance		

Policy paragraph	Policy description	Compliance commentary
Paragraph 2.10.60	As set out above applicants will consider several factors when considering the design and layout of sites, including, proximity to available grid capacity to accommodate the scale of generation, orientation, topography, previous land–use and ability to mitigate environmental impacts and flood risk.	As set out in **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]** and the **Design Approach Document [EN010154/APP/7.3]**, the Applicant identified Lincolnshire as an optimal area within the UK to locate a large-scale solar development due to its good levels of irradiation and large areas of open, flat land. Following engagement with National Grid, the Applicant secured a point of connection at the proposed National Grid substation near Navenby. More detail on the connection can be found in the **Grid Connection Statement [EN010154/APP/7.5]**.
Paragraph 2.10.61	For a solar farm to generate electricity efficiently the panel array spacing should seek to maximise the potential power output of the site. The type, spacing and aspect of panel arrays will depend on the physical characteristics of the site such as site elevation.	As set out in Section 4 of **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]**, the site had suitable topography for the Proposed Development. Design was considered in the site selection which sought to identify a site that was as least environmentally constrained as possible, whilst also meeting operational requirements. Aspects such as type, spacing and aspect of panel arrays have been influenced by the physical characteristics of the site. Further detail and justification on each component of the Proposed Development can be found in **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1].**
Paragraph 2.10.62	In terms of design and layout, applicants may favour a south-facing arrangement of panels to maximise output although other orientations may be chosen.	The Proposed Development, and assessments presented in the ES (**Chapters 6–14**, **[EN010154/APP/6.1]**), allow for

Policy paragraph	Policy description	Compliance commentary
	For example, an east-west layout, whilst likely to result in reduced output compared to south-facing panels on a panel-by-panel basis, may allow for a greater density of panels to compensate and therefore for generation to be spread more evenly throughout the day.	the installation of fixed south facing or single axis tracker configurations. For a fixed south facing configuration, the PV tables would be aligned east to west with the panels sloping towards the south at a fixed angle of 5 to 45 degrees from horizontal. For a single axis tracker configuration, the strings of PV will be secured on single axis tracker mounting structures that are configured in rows generally orientated north-south and which will track the position of the sun.
Paragraph 2.10.63	It is likely that underground and overhead cabling will be required to connect the electrical assets of the site, such as from the substation to the panel arrays or storage facilities.	As set out in Section 3.3 of **Chapter 3: The Proposed Development** of the ES [**EN010154/APP/6.1],** low voltage cabling between PV panels and the inverters (typically via 1.5/1.8kV cables) will typically be located above ground level (along a row of racks), fixed to the mounting structure, and then underground (between solar PV array tables and in the central inverters and or transformer input). Medium voltage cables (around 33kV) are required between the transformers, switchgear and the Onsite Substation. These buried interconnecting cables will be located within the Solar PV Array Areas and within the Interconnecting Cable Corridors between the Solar PV Array Areas. The trench will typically be up to 1m wide with a maximum depth of 1.2m and will be dependent on the method of installation, ground conditions and number of cables laid in parallel. A minimum backfill of 0.8m will be on top of the cable.
Paragraph 2.10.64	In the case of underground cabling, applicants are expected to provide a method statement describing cable trench design, installation methodology, as well as details of the operation and maintenance regime.	

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		Horizontal directional drilling (HDD) within the Principal Site will be required for the onsite cabling to cross under the A46 and the River Witham. Cables will be installed at the following depths: (a) trenchless crossing of the export cable circuit 5m beneath Main Rivers (i.e. Brant and Witham) and (b) 2m beneath minor/ordinary watercourses, except where minor/ordinary watercourses have minimal or no water flow and water management is easily managed. Cables to connect to the proposed National Grid substation near Navenby are not proposed as part of the Proposed Development. Section 3.3 of **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]**, sets out the construction methodology. **Figure 3-11: Typical Trenched Crossings Cross-Sections** of the ES **[EN010154/APP/6.2],** **Figure 3-12: Indicative Trenchless Crossing Locations** of the ES **[EN010154/APP/6.2],** **Figure 3-13: Typical Trenchless Crossings Cross Section** of the ES **[EN010154/APP/6.2],** **Figure 3-14: Typical 400kV Jointing Bay** of the ES **[EN010154/APP/6.2],Figure 3-16: Typical 400kV Cable Cross Section** of the ES **[EN010154/APP/6.2]** provide further detail on construction methodology. The existing above ground powerlines across the Principal Site are not proposed to be altered by the Proposed

Policy paragraph	Policy description	Compliance commentary
		Development, and the appropriate offsets from the above ground infrastructure will be maintained. Details of the operation and maintenance of the Proposed Development are provided in the **Framework OEMP [EN010154/APP/7.8]**. The **Framework OEMP [EN010154/APP/7.8]** sets out how commitments made in the EIA will be translated into actions during operation of the Proposed Development and includes a process from implementing the actions to allocation of key roles and responsibilities. The **Framework OEMP [EN010154/APP/7.8]** is secured via Requirement 13 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Project Lifetime and decommissioning		
Paragraph 2.10.65	Applicants should consider the design life of solar panel efficiency over time when determining the period for which consent is required. An upper limit of 40 years is typical, although applicants may seek consent without a time-period or for differing time-periods of operation.	As described in **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]**, the operational life of the Proposed Development will be 60 years from the point of commissioning of the entirety of the Proposed Development. The Applicant is seeking a time limited consent for the Proposed Development to be in operation for 60 years, with decommissioning to take place following cessation of operation. A 60-year time limited consent will maximise the renewable energy generation of the Proposed Development and allow for replacement halfway through if there is a loss in output capacity. A 60-year time period also allows

Policy paragraph	Policy description	Compliance commentary
		flexibility for technological advancements in PV arrays after a few decades, should it be available. The operational life of the Proposed Development is anticipated to be from 2033 to 2093. As set out in the **Framework DEMP [EN010154/APP/7.9]**, during decommissioning, all infrastructure associated with the Proposed Development will be removed and recycled or disposed of in accordance with good practice and market conditions at that time. This is with the exception of the cabling and/or cable ducting in the Cable Corridor, which may remain in-situ. Requirement 20 of the **Draft Development Consent Order [EN010154/APP/3.1]** provides that decommissioning works must commence no later than 60 years following the date of final commissioning. Decommissioning is expected to take between 12 and 24 months and would be undertaken in phases. Section 3.6 of **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]** describes the decommissioning activities. The decommissioning of the Proposed Development is supported by the **Framework DEMP [EN010154/APP/7.9]** and to be detailed in full as per Requirement 20 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. The **Framework DEMP [EN010154/APP/7.9]** helps ensure compliance with the relevant environmental mitigation measures set out within the ES.

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		As set out in **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]**, the majority of the Principal Site would be returned to the landowner after decommissioning and will be available for its original use and any planting would be retained as far as practicable. Areas of landscape and biodiversity mitigation and enhancement, as well as permissive paths delivered as part of the Proposed Development, would remain up until the land is returned to the previous landowners. Following this, the landowners would choose how the land is to be used and managed.
Paragraph 2.10.66	Time limited consent, where granted, is described as temporary because there is a finite period for which it exists, after which the project would cease to have consent and therefore must seek to extend the period of consent or be decommissioned and removed.	As described in **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]**, The operational life of the Proposed Development is 60 years, with decommissioning to start 60 years after the commercial operation date.
Paragraph 2.10.69	Applicants should set out what would be decommissioned and removed from the site at the end of the operational life of the generating station, considering instances where it may be less harmful for the ecology of the site to keep or retain certain types of infrastructure, for example underground cabling, and where there may be socio-economic benefits in retaining site infrastructure after the operational life, such as retaining pathways through the site or a site substation	As set out in the **Framework DEMP [EN010154/APP/7.9],** during decommissioning, all infrastructure associated with the Proposed Development will be removed and recycled or disposed of in accordance with good practice and market conditions at that time. This is with the exception of the cabling and/or cable ducting in the Cable Corridor, which may remain in-situ. Decommissioning is expected to take between 12 and 24 months and would be undertaken in phases. Section 3.6 of

Policy paragraph	Policy description	Compliance commentary
Paragraph 2.10.147	Where the consent for a solar farm is to be time-limited, the DCO should impose a requirement setting that time-limit from the date the solar farm starts to generate electricity.	**Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]** describes the decommissioning activities. The decommissioning of the Proposed Development is supported by the **Framework DEMP [EN010154/APP/7.9]** and to be detailed in full as per Requirement 20 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. The **Framework DEMP [EN010154/APP/7.9]** will help ensure compliance with the relevant environmental mitigation measures set out within the ES. As set out of **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]**, the majority of the Principal Site would be returned to the landowner after decommissioning and will be available for its original use and any planting would be retained as far as practicable. Areas of landscape and biodiversity mitigation and enhancement, as well as permissive paths delivered as part of the Proposed Development, would remain up until the land is returned to the previous landowners. Following this, the landowners would choose how the land is to be used and managed.
Paragraph 2.10.148	Such a requirement should also secure the decommissioning of the generating station after the expiration of its permitted operation to ensure that inoperative plant is removed after its operational life	
Paragraph 2.10.149	An upper limit of 40 years is typical, although applicants may seek consent without a time period or for differing time-periods for operation	
Paragraph 2.10.150	The time limited nature of the solar farm, where a time limit is sought as a condition of consent, is likely to be an important consideration for the Secretary of State.	
Paragraph 2.10.151	The Secretary of State should consider the period of time the applicant is seeking to operate the generating station as well as the extent to which the site will return to its original state when assessing impacts such as landscape and visual effects and potential effects on the settings of heritage assets and nationally designated landscapes	
Flexibility		
Paragraph 2.10.70	In many cases, not all aspects of the proposal may have been settled in precise detail at the point of application. Such aspects may include: • the type, number and dimensions of the panels;	As set out in **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]**, the technology for solar PV and BESS continues to evolve rapidly; for example, solar PV panels are becoming increasingly powerful year on year

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	• layout and spacing; • the type of inverter or transformer; and • whether storage will be installed (with the option to install further panels as a substitute).	and better at minimising shading losses, which affects how developers space the rows of solar PV and the amount of land needed to achieve the proposed export capacity. As a result, the design parameters of the Proposed Development maintain some degree of flexibility for example through development extents or specific maximum heights to allow the most appropriate technology to be utilised at the time of construction. Further detail on this is set out in Section 3.2 of **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]** and the **Proposed Development Parameters [EN010154/APP/7.4]**, providing certainty that the impacts of the Proposed Development will be no worse than those assessed as part of the EIA.
Paragraph 2.10.71	Applicants should set out a range of options based on different panel numbers, types and layout, with and without storage.	
Paragraph 2.10.74	Guidance on how applicants should manage flexibility is set out at Section 2.6 of this NPS.	
Biodiversity and Ecological Conservation		
Paragraph 2.10.76	The applicant's ecological assessments should identify any ecological risk from developing on the proposed site.	**Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** presents the findings of an assessment of the potential significant effects of the construction, operational (including maintenance), and decommissioning phases of the Proposed Development on ecology and nature conservation (collectively referred to as biodiversity). The assessment is based upon the maximum parameters of design for the Proposed Development and the design information (see **Chapter 3: The Proposed Development** of this ES **[EN010154/APP/6.1]**).
Paragraph 2.10.77	Issues that need assessment may include habitats, ground nesting birds, wintering and migratory birds, bats, dormice, reptiles, great crested newts, water voles and badgers	
Paragraph 2.10.78	The applicant should use an advising ecologist during the design process to ensure that adverse impacts are avoided, minimised or mitigated in line with the mitigation hierarchy, and biodiversity enhancements are maximised	

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Paragraph 2.10.79	The assessment may be informed by a 'desk study' of existing ecological records, an evaluation of the likely impacts of the solar farm upon ecological features and should specify mitigation to avoid or minimise these impacts, and any further surveys required	The assessment included a comprehensive desk study and field survey data that informed species-specific assessments to identify priority habitats and presence of any protected and notable species. In summary, **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** assesses there to be no significant adverse effects have been identified during construction, operation or decommissioning of the Proposed Development. Ecology has been considered throughout the design process, as described in Sections 3 and 4 of the **Design Approach Document [EN010154/APP/7.3]**, and mitigation measures are proposed where appropriate including replacing habitats lost during construction and enhancing habitats within the Order Limits through the creation of grasslands, tree belts and areas of scrub. Further measures are outlined in the **Framework Landscape and Ecological Management Plan** (LEMP) **[EN010154/APP/7.15]** to be secured under Requirement 8 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 2.10.80	Applicants should consider earthworks associated with construction compounds, access roads and cable trenching.	A **Framework SMP [EN010154/APP/7.10]** supports this application and a detailed SMP is to be secured under Requirement 15 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 2.10.81	Where soil stripping occurs, topsoil and subsoil should be stripped, stored, and replaced separately to minimise soil damage and to provide optimal	

Policy paragraph	Policy description	Compliance commentary
	conditions for site restoration. Further details on minimising impacts on soil and soil handling are above at 2.10.33 and 2.10.34.	As set out in the **Framework SMP [EN010154/APP/7.10]**, the plan will help protect soil resources by identifying: a. Areas of soil to be protected from earthworks and construction activities; b. Areas and types of topsoil/subsoil to be stripped, haulage routes and stockpile locations; and c. Methods for stripping, stockpiling, respreading and ameliorating landscape soils. This will support the following objectives: a. Avoid reducing soil quality due to mixing soil types (limits options for allocation); b. Avoid contamination with construction waste; c. Avoid damaging through compaction or any loss of soils due to poor handling, haulage and stockpiling methodology; d. Avoid contaminating soil as a result of accidental spillage; and e. Avoid loss of soils due to erosion.
Paragraph 2.10.82	Applicants should consider how security and lighting installations may impact on the local ecology. Where pole mounted CCTV facilities are proposed the location of these facilities should be carefully considered to minimise impact. If lighting is necessary, it should be minimised and directed away from areas of likely habitat.	Whilst there are security features for the Proposed Development as outlined in Sections 3.3 and 3.4 of **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]**, no areas of the Proposed Development are proposed to be continuously lit. For security requirements, operational lighting would include Passive Infra-red Detector (PID) systems which would be installed around the perimeter of the Proposed

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		Development. All lighting would seek to limit any impact on sensitive receptors following guidance from the Bat Conservation Trust among others. As set out in Section 2.5 of the **Framework CEMP [EN010154/APP/7.7]**, all construction lighting will be deployed in accordance with the following recommendations to prevent or reduce the impact on human and ecological receptors: a. The use of lighting will be minimised to that required for safe site operations b. Lighting will utilise directional fittings to minimise outward light spill and glare (e.g. via the use of light hoods/cowls which direct light below the horizontal plane, preferably at an angle greater than 20° from horizontal); and c. Lighting will be directed towards the middle of the DCO Site Boundary rather than towards land outside of the boundaries. The **Framework CEMP [EN010154/APP/7.7]** is secured in detail under Requirement 12 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 2.10.83	Applicants should consider how site boundaries are managed. If any hedges/scrub are to be removed, further surveys may be necessary to account for impacts. Buffer strips between perimeter fencing and hedges may be proposed, and the construction and design of any fencing should account for enabling	Effects on flora and fauna are set out in **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]**. Fencing will be permeable for most animals and offset from roads to ensure that fauna is not put at risk from road traffic as well as not putting road users at risk. The fence design will include gaps to allow mammals to pass underneath at strategic locations to maintain ecological connectivity.

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	mammal, reptile and other fauna access into the site if required to do so in the ecological report.	Details of the proposed perimeter fencing are provided within **Chapter 3: The Proposed Development** of this ES **[EN010154/APP/6.1]** and included in the **Framework LEMP [EN010154/APP/7.15]**. Surveys of hedgerows have been undertaken, and the results are set out in **Appendix 8-B: Terrestrial Habitats and Notable Flora** of the ES **[EN010154/APP/6.3]**. The outcome of the surveys has been taken into account in assessment present in **Chapter 8 Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** which concludes that there are no significant adverse effects identified during construction, operation or decommissioning of the Proposed Development.
Paragraph 2.10.89	Solar farms have the potential to increase the biodiversity value of a site, especially if the land was previously intensively managed. In some instances, this can result in significant benefits and enhancements beyond Biodiversity Net Gain, which result in wider environmental gains which is encouraged.	The Proposed Development would provide a number of environmental and ecological enhancements, with areas of habitat and biodiversity mitigation and enhancement as well as approximately 9.5km of permissive paths delivered as part of the Proposed Development, which would remain in-situ following decommissioning as set out within the **Framework DEMP [EN010154/APP/7.9]**. The environmental and ecological enhancement measures are set out in the **Framework LEMP [EN010154/APP/7.15]** and **Framework CEMP [EN010154/APP/7.7].** The provision and management of permissive paths is detailed within the **Framework PRoW-MP [EN010154/APP/7.14].**
Paragraph 2.10.90	For projects in England, applicants should consider enhancement, management, and monitoring of biodiversity in line with the ambition set out in the Environmental Improvement Plan and any relevant measures and targets, including statutory targets set under the Environment Act or elsewhere.	

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Paragraph 2.10.128	In England, proposed enhancements should take account of the above factors and as set out in Section 4.6 and 5.4 of EN-1 aim to achieve environmental and biodiversity net gain in line with the ambition set out in the Environmental Improvement Plan and any relevant measures and targets, including statutory targets set under the Environment Act or elsewhere.	As detailed within the **Biodiversity Net Gain** (BNG) **Report [EN010154/APP/7.12]**, the Applicant has committed to delivering a minimum of 30% BNG in habitat units, 50% BNG in hedgerow units and 10% BNG in watercourse units. The delivery of BNG is secured under Requirement 8 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 2.10.129	This might include maintaining or extending existing habitats and potentially creating new important habitats, for example by installing cultivated strips/plots for rare arable plants, rough grassland margins, bumble bee plant mixes, and wild bird seed mixes.	
Paragraph 2.10.130	Applicants are advised to develop an ecological monitoring programme to monitor impacts upon the flora of the site and upon any particular ecological receptors (such as bats and wintering birds). Results of the monitoring will then inform any changes needed to the land management of the site, including, if appropriate, any livestock grazing regime.	Habitat creation, management and monitoring details are set out in the **Framework LEMP [EN010154/APP/7.15],** secured as DCO Requirement 8 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**, to ensure mitigation and enhancement measures are delivered successfully. The **Framework LEMP [EN010154/APP/7.15]** sets out landscaping and monitoring measures including: a. Pre-construction monitoring including surveys of breeding and non-breeding birds, bats, riparian mammals and badgers undertaken a year prior to construction to identify any ecological constraints,

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		including any protected species licensing requirements. b. A post-construction monitoring programme that will be formalised, agreed and included within the detailed LEMP (secured under Requirement 8 as detailed in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. Walkover surveys of the DCO Site will be undertaken between April and June in years 2, 4, 6, 10 and then every 5 years post-construction until year 60. This monitoring will also be used for the purposes of BNG Condition Assessment that requires a 30-year management plan. c. Post construction monitoring for flora, birds (breeding and non-breeding), riparian mammals, badgers and bats (bat box roosting and activity survey), will be undertaken in the respective seasons, in years 1, 3, 5, 10 and 15 post-construction and thereafter every ten years from years 20 to 60. These surveys are likely to involve similar methods to those used to determine the ecological baseline of the Proposed Development and will be overseen by an Ecological Advisory Group or similar.

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		d. Maintenance checks of wildlife features (e.g. bat and bird boxes etc.) will be made annually to ensure that these features are still in position and secure. Results from the post-construction monitoring will feed into the management plan and, if required, management may be amended accordingly based on this monitoring. For example, replacement planting and/or changes to planting species where planting has failed to establish.
Drainage		
Paragraph 2.10.84	Where a Flood Risk Assessment has been carried out this must be submitted alongside the applicant's ES. 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.	A Flood Risk Assessment (FRA) has been carried out and can be found in full in **Appendix 9-C: Flood Risk Assessment** of the ES **[EN010154/APP/6.3]**. The FRA concludes that the area of the Proposed Development remains safe for its lifetime, does not increase flood risk elsewhere, and fulfils the Government's wider criteria for sustainable development. As set out in Section 4 of **Appendix 9-D: Framework Surface Water Drainage Strategy** of the ES **[EN010154/APP/6.3]**, the proposed solar PV panels will be mounted a minimum of 800mm above ground level, typically on narrow diameter piled legs. This prevents sealing the ground with an impermeable surface beneath the solar panels, allowing rainfall/runoff to infiltrate to ground throughout the Principal Site.
Paragraph 2.10.85	Where access tracks need to be provided, permeable tracks should be used, and localised Sustainable Drainage Systems (SuDS), such as swales and infiltration trenches, should be used to control any runoff where recommended.	
Paragraph 2.10.86	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.	
Paragraph 2.10.87	Culverting existing watercourses/drainage ditches should be avoided.	

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Paragraph 2.10.88	Where culverting for access is unavoidable, applicants should demonstrate that no reasonable alternatives exist and where necessary it will only be in place temporarily for the construction period.	**Appendix 9-D: Framework Surface Water Drainage Strategy** of the ES **[EN010154/APP/6.3]** also sets out that new access roads will be permeable, (this is secured within **Appendix A: Design Commitments** of the **Design Approach Document [EN010154/APP/7.3]** under Requirement 6 as detailed in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. Therefore, the Principal Site's access roads will not lead to an increase in impermeable area. Furthermore, **Appendix 9-D: Framework Surface Water Drainage Strategy** of the ES **[EN010154/APP/6.3]**, considers the existing ability for rainfall to soak into the ground and sets out the framework Surface Water Drainage Strategy for the Principal Site which aims to mimic the natural drainage conditions as far as possible, by using Sustainable Drainage Systems (SuDS) to manage surface water flows generated by the Proposed Development infrastructure. Flood risk during construction and decommissioning of the Proposed Development across the Principal Site and Cable Corridor is to be managed in-situ for the duration of works via flood risk and pollution management mitigation measures documented within the **Framework CEMP [EN010154/APP/7.7]**, secured via Requirement 12 as detailed in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.

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		No new culverts are proposed as part of the Proposed Development. Impacts of surface and groundwater quality, groundwater resources and hydrology will be controlled by the **Framework CEMP [EN010154/APP/7.7]**, **Framework OEMP [EN010154/APP/7.8]** and **Framework DEMP EN010154/APP/7.9]**, secured by Requirements 12,13, and 20 as detailed in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. A detailed surface and foul water drainage strategy is also secured by Requirement 10 which will require approval from the relevant planning authority and lead local flood authority in NKDC and LCC, as outlined in the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 2.10.154	Water management is a critical component of site design for ground mount solar plants. Where previous management of the site has involved intensive agricultural practice, solar sites can deliver significant ecosystem services value in the form of drainage, flood attenuation, natural wetland habitat, and water quality management.	The detailed CEMP secured by Requirement 12 as detailed in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]** will be supported by a Water Management Plan (WMP), that will provide greater detail regarding the mitigation to be implemented to protect the water environment from adverse effects during construction. The potential for adverse impacts would be minimised by the adoption of the general mitigation measures, which will be described in the WMP and **Framework CEMP [EN010154/APP/7.7]**, which will include details such as pre, during and post-construction water quality monitoring.

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Landscape, Visual and Residential Amenity		
Paragraph 2.10.94	The approach to assessing cumulative landscape and visual impact of large-scale solar farms is likely to be the same as assessing other onshore energy infrastructure. Solar farms are likely to be in low lying areas of good exposure and as such may have a wider zone of visual influence than other types of onshore energy infrastructure.	Consideration of the landscape and visual effects for the Proposed Development started at the site selection stage, described in full in **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]**. In summary, the site assessment recognised that the Lincoln Cliff Area of Great Landscape Value (AGLV) is located within the proposed area of search and thus sought to avoid this. As set out in the **Design Approach Document [EN010154/APP/7.3]**, the landscape and visual impacts have been considered from the outset, the design has sought to respect the wider landscape and the intrinsic value of the countryside and natural environment. **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** provides an assessment of the likely significant effects of the Proposed Development during construction, operation and maintenance, and decommissioning. This is supported by **Appendix 10-E: Landscape Assessment** of the ES **[EN010154/APP/6.3]** and **Appendix 10-F: Visual Assessment** of the ES **[EN010154/APP/6.3]**. Visualisations are shown in **Figure 10-10: Photomontages** of the ES **[EN010154/APP/6.2]**.
Paragraph 2.10.95	However, whilst it may be the case that the development covers a significant surface area, in the case of ground-mounted solar panels it should be noted that with effective screening and appropriate land topography, the area of a zone of visual influence could be appropriately minimised	
Paragraph 2.10.96	Landscape and visual impacts should be considered carefully preapplication. Potential impacts on the statutory purposes of nationally designated landscapes should form a part of the pre application process.	
Paragraph 2.10.97	Applicants should carry out a landscape and visual assessment and report it in the ES. Visualisations may be required to demonstrate the effects of a proposed solar farm on the setting of heritage assets and any nearby residential areas or viewpoints.	
Paragraph 2.10.98	Applicants should follow the criteria for good design set out in Section 4.7 of EN-1 when developing projects and will be expected to direct considerable	As set out in the **Design Approach Document [EN010154/APP/7.3]**, the Applicant has sought to achieve good design outcomes from an early stage. At the site

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	effort towards minimising the landscape and visual impact of solar PV arrays especially within nationally designated landscapes.	selection stage, as set out in **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]**, a site was identified that was as least environmentally constrained as possible, and through the production of a clear Design Vision and Principles, the design of the Proposed Development has evolved within a clear structure, based on the site context and national and local policy including the criteria for good design set out in Paragraphs 4.7.5 to 4.7.9 of NPS EN-1. The application of the Design Vision and Principles has resulted in sustainable infrastructure that is sensitive to place, matched by an appearance that demonstrates good aesthetic as far as possible, in accordance with paragraph 4.7.2 of NPS EN-1.
Paragraph 2.10.99	Whilst there is an acknowledged need to ensure solar PV installations are adequately secured, required security measures such as fencing should consider the need to minimise the impact on the landscape and visual impact.	Fencing and security are considered in Section 3.3 of **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1].** Section 10.6 in **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** considers fencing, stating that this will consist of wooden posts with stock proof fencing, measuring up to 2m high around the Principal Site, which allows for visual permeability and minimises visual impact. The security measures have been designed to minimise impact where possible with no permanent lighting proposed. The lighting strategy is described in **Chapter 3: The**

Policy paragraph	Policy description	Compliance commentary
		Proposed Development of the ES **[EN010154/APP/6.1]** and the sensitive design of lighting and embedded mitigation measures are discussed in section 10.6 of **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]**. Measures comprise the following: a. No areas of the Proposed Development will be continuously lit. b. Operational lighting will be triggered by Passive Infra-red Detector (PID) systems, which will be installed around the perimeter of the Proposed Development. c. Lighting will be directional with care to minimise potential for light spillage beyond the Site particularly towards neighbouring properties, habitats, highways or waterways. d. Lights installed will be of the minimum brightness and/or power rating capable of performing the desired function. e. Light fittings will be used to reduce the amount of light emitted above the horizontal (reduce upward lighting). f. The lighting of the primary substation will be motion sensor triggered, similar to street lighting, that would operate from dusk. g. Low level lighting on specific operational units will be triggered by motion sensors, from dusk.

Policy paragraph	Policy description	Compliance commentary
		h. The inward facing CCTV cameras will typically use infra-red night-vision technology and will not require additional lighting or areas to be continuously lit. i. During maintenance, the cleaning of the solar PV panels will require tractor mounted lighting, which is similar to that used during night-time arable harvesting operations currently undertaken within the Principal Site. These measures are set out in the **Framework CEMP [EN010154/APP/7.7]** secured via Requirement 12 as detailed in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 2.10.100	The applicant should consider as part of the design, layout, construction, and future maintenance plans how to protect and retain, wherever possible, the growth of vegetation on site boundaries, as well as the growth of existing hedges, established vegetation, including mature trees within boundaries. Applicants should also consider opportunities for individual trees within the boundaries to grow on to maturity.	Delivery of the Landscape Strategy set out in the **Framework LEMP [EN010154/APP/7.15]** is integral to achieving good design outcomes. The Landscape Strategy seeks to: a. Integrate the Proposed Development into the existing landscape pattern by utilising and aligning with existing features, including vegetation where feasible; b. Replace habitats lost during construction and enhance habitats within the DCO Site Boundary through the creation of grasslands, tree belts and areas of scrub; and
Paragraph 2.10.101	The impact of the proposed development on established trees and hedges should be informed by a tree survey and arboricultural/hedge assessment as appropriate.	

Policy paragraph	Policy description	Compliance commentary
Paragraph 2.10.131	Applicants should consider the potential to mitigate landscape and visual impacts through, for example, screening with native hedges, trees and woodlands.	c. Filter and screen more prominent components of the Proposed Development in views from sensitive receptors. Managed arable land would be provided within the areas of the DCO Site where there is no solar PV infrastructure to benefit ground nesting birds. These areas are indicatively illustrated as Arable fields A to F on **Figure 8-5: Bird Mitigation Land Allocation** of the ES **[EN010154/APP/6.2]**. These would provide habitat for important ground nesting birds such as Skylark and Lapwing. The likely direct and indirect impacts of the Proposed Development on trees, along with suitable mitigation measures, are considered in the **Appendix 10-H: Arboricultural Impact Assessment** of the ES **[EN010154/APP/6.3]**. As set out in the conclusion of the assessment, the impacts of tree removals will be compensated by the proposed tree planting and associated landscaping works as detailed in the **Framework LEMP [EN010154/APP/7.15]**. No veteran or ancient trees or ancient woodland are to be removed, nor are any trees subject to Tree Preservation Order or within a Conservation Area are to be removed (based on TPO and CA information available at the time of writing). Measures included in the **Framework LEMP [EN010154/APP/7.15]** include the retention of existing
Paragraph 2.10.132	Applicants should aim to minimise the use and height of security fencing. Where possible applicants should utilise existing features, such as hedges or landscaping, to assist in site security or screen security fencing.	

Policy paragraph	Policy description	Compliance commentary
		habitats including individual trees, shrubs and woodland, hedgerows, and arable land and ponds which will maintain visual amenity, reinforce the character of the landscape, provide a structure for the addition of new planting, provide land for bird mitigation, and enhance the biodiversity value of aquatic species. A range of new habitats are proposed including woodland and tree belts, hedgerows with trees, scrub, individual trees, various forms of grassland, community orchard, localised features and arable flora. These measures will provide biodiversity enhancements providing value to wildlife, screen sensitive areas and supplement existing retained features. The **Framework LEMP [EN010154/APP/7.15]** is secured in detail under Requirement 8 as detailed in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. As set out in the **Design Approach Document [EN010154/APP/7.3]**, the landscape design has sought to integrate the Proposed Development into its surrounding landscape by utilising existing features and avoiding or minimising adverse landscape and visual effects as much as possible. This is evident in the retained hedgerows, trees and woodland, arable fields and ponds and the proposed hedgerows, woodlands and tree belts, grassland and community orchards located at the site boundary and throughout the DCO Site itself.

Policy paragraph	Policy description	Compliance commentary
Paragraph 2.10.157	The Secretary of State will consider the landscape and visual impact of any proposed solar PV farm, taking account of any sensitive visual receptors, and the effect of the development on landscape character, together with the possible cumulative effect with any existing or proposed development. Nationally designated landscapes (National Parks, The Broads and Areas of Outstanding Beauty) are afforded extra protection due their statutory purpose. Development in these areas needs to satisfy policy as set out in EN-1 Section 5.10.	Whilst there are no statutory designated landscapes impacted by the Proposed Development, as concluded in **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]**, it is evident that there will be an adverse impact on the surrounding landscape and visual impact caused by the Proposed Development during the operational phase and there will be long-term moderate to major adverse effects on landscape character and visual amenity. In most instances, these impacts can be adequately mitigated but, in some instances, there will be residual adverse impacts resulting in harm which needs to be weighed in the planning balance. This harm is tempered by other instances where current landscape and visual impacts are improved such as hedgerow gapping up, strengthening field boundaries and biodiversity improvements. A full assessment of effects is presented in **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1].** These effects are weighed in detail in the appraisal at Section 6 and the planning balance considered at Section 7 of the **Planning Statement [EN010154/APP/7.2].**
Glint and Glare		
Paragraph 2.10.102	Solar PV panels are designed to absorb, not reflect, irradiation. However, solar panels may reflect the sun's rays at certain angles, causing glint and glare.	The design of the Proposed Development includes embedded design mitigation for glint and glare, including landscaping to screen the Proposed Development from

Policy paragraph	Policy description	Compliance commentary
	Glint is defined as a momentary flash of light that may be produced as a direct reflection of the sun in the solar panel. Glare is a continuous source of excessive brightness experienced by a stationary observer located in the path of reflected sunlight from the face of the panel. The effect occurs when the solar panel is stationed between or at an angle of the sun and the receptor.	view of receptors to glint and glare, as well as landscape and visual impacts. This is described in detail in **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]**. The embedded mitigation measures include: a. Careful siting of the Proposed Development in the landscape with offsets from existing residential areas, vegetation patterns, and road networks; b. Conserving existing vegetation patterns; and c. Creating new Green Infrastructure (i.e., vegetation planting) within the Principal Site with extensive planting proposals. A full glint and glare assessment which considers the potential impacts on ground-based receptors such as roads, rail and residential dwellings as well as aviation assets is set out in the **Appendix 14-D: Glint and Glare Assessment** of the ES **[EN010154/APP/6.3]**. The assessment concludes that overall impacts on aviation receptors are acceptable and not significant.
Paragraph 2.10.103	Applicants should map receptors to qualitatively identify potential glint and glare issues and determine if a glint and glare assessment is necessary as part of the application.	
Paragraph 2.10.104	When a quantitative glint and glare assessment is necessary, applicants are expected to consider the geometric possibility of glint and glare affecting nearby receptors and provide an assessment of potential impact and impairment based on the angle and duration of incidence and the intensity of the reflection.	
Paragraph 2.10.105	The extent of reflectivity analysis required to assess potential impacts will depend on the specific project site and design. This may need to account for ‘tracking’ panels if they are proposed as these may cause differential diurnal and/or seasonal impacts.	
Paragraph 2.10.106	When a glint and glare assessment is undertaken, the potential for solar PV panels, frames and supports to have a combined reflective quality may	

Policy paragraph	Policy description	Compliance commentary
	need to be assessed, although the glint and glare of the frames and supports is likely to be significantly less than the panels.	
Paragraph 2.10.133	Applicants should minimise the use of security lighting. Any lighting should utilise a passive infra-red (PIR) technology and should be designed and installed in a manner which minimises impact.	Lighting sensors for security purposes would be implemented on critical electrical infrastructure only. No areas are proposed to be permanently lit. As set out in **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]**, operational lighting would include Passive Infra-red Detector (PID) systems which would be installed around the perimeter of the Proposed Development.
Paragraph 2.10.134	Applicants should consider using, and in some cases the Secretary of State may require, solar panels to comprise of (or be covered with) anti-glare/anti-reflective coating with a specified angle of maximum reflection attenuation for the lifetime of the permission.	As set out in section 3.3 of **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]**, currently individual panels are typically up to 2.4m in height by 1.3m in width and consist of a series of PV cells beneath a layer of toughened glass with an anti-reflective coating.
Paragraph 2.10.135	Applicants may consider using screening between potentially affected receptors and the reflecting panels to mitigate the effects.	As set out in section 3.3 of **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]**, the Proposed Development will include new planting, field boundary enhancement and planting of seed mixes within the Solar PV Array Areas and within the wider Principal Site. Planting will be used to provide screening for visual and glint and glare mitigation, mitigation for wildlife, and habitat enhancement.

Policy paragraph	Policy description	Compliance commentary
Paragraph 2.10.158	Solar PV panels are designed to absorb, not reflect, irradiation. However, the Secretary of State should assess the potential impact of glint and glare on nearby homes, motorists, public rights of way, and aviation infrastructure (including aircraft departure and arrival flight paths).	As set out in Section 14.3 of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1],** with the proposed embedded design mitigation within the **Framework LEMP [EN010154/APP/7.15]**, no significant residual effects are anticipated from glint and glare as a result of the Proposed Development. The full assessment is presented in **Appendix 14-D Glint and Glare Assessment** of the ES **[EN010154/APP/6.3]**. The effects of glint and glare and their impact on local receptors is predicted to be Low at 36 residential receptors, and Low at 10 bridleway receptors, whilst the remaining ground-based receptors are expected to have no impacts once mitigation measures have been considered. Impacts upon aviation receptors are predicted to be Acceptable. Therefore, overall impacts are Not Significant.
Paragraph 2.10.159	Whilst there is some evidence that glint and glare from solar farms can be experienced by pilots and air traffic controllers in certain conditions, there is no evidence that glint and glare from solar farms results in significant impairment on aircraft safety. Therefore, unless a significant impairment can be demonstrated, the Secretary of State is unlikely to give any more than limited weight to claims of aviation interference because of glint and glare from solar farms	
Cultural Heritage		
Paragraph 2.10.107	The impacts of solar PV developments on the historic environment will require expert assessment in most cases and may have effect both above and below ground.	**Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]** outlines the assessment of potential impacts and likely significant effects arising from the Proposed Development on cultural heritage, during the construction, operation, and decommissioning stages. This encompasses buried archaeological remains, built heritage and the historic landscape (cultural heritage assets).
Paragraph 2.10.108	Above ground impacts may include the effects on the setting of Listed Buildings and other designated heritage assets as well as on Historic Landscape Character.	
Paragraph 2.10.109	Below ground impacts, although generally limited, may include direct impacts on archaeological	

Policy paragraph	Policy description	Compliance commentary
	deposits through ground disturbance associated with trenching, cabling, foundations, fencing, temporary haul routes etc.	A full appraisal of the Proposed Development against planning policy, including EN-3, is provided in Section 6 of the **Planning Statement [EN010154/APP/7.2]**.
Paragraph 2.10.110	Equally, solar PV developments may have a positive effect, for example archaeological assets may be protected by a solar PV farm as the site is removed from regular ploughing and shoes or low-level piling is stipulated.	In summary, the mitigation measures built into the Proposed Development minimise the changes to surrounding designated and built heritage assets and the historic landscape resource. It is acknowledged however that the Proposed Development would lead to less than substantial harm (at the lower end of the scale) to two designated heritage assets and one non-designated heritage asset. However, it should be noted that the effects would be both temporary and reversible, albeit long term.
Paragraph 2.10.112	Applicant assessments should be informed by information from Historic Environment Records (HERs) or the local authority.	Details of the HERs are provided in **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]** and **Appendix 7-B: Cultural Heritage Desk Based Assessment** of the ES **[EN010154/APP/6.3]** contains an appropriate desk-based assessment that identifies all known designated and non-designated terrestrial heritage assets located within the Site and the defined study areas, and establishes the archaeological and historical background. The approach to trial trench evaluation and methodology is set out in **Appendix 7-H: Written Scheme of Investigation for an Archaeological Evaluation** of the ES **[EN010154/APP/6.3]**. The WSI was agreed with the County Archaeologist at Lincolnshire County Council prior to the commencement of trial trenching, and the County Archaeologist has been on site prior to trenches being
Paragraph 2.10.113	Where a site on which development is proposed includes, or has the potential to, include heritage assets with archaeological interest, the applicant should submit an appropriate desk-based assessment and, where necessary, a field evaluation. These should be carried out, using expertise where necessary and in consultation with the local planning authority, and should identify archaeological study areas and propose appropriate schemes of investigation, and design measures, to ensure the protection of relevant heritage assets.	

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		backfilled. The results of the trial trenching undertaken to date are presented within **Appendix 7-I: Trial Trenching Report (Interim)** of the ES **[EN010154/APP/6.3].** As set out in Section 7.3 of **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]** consultation has been undertaken with key stakeholders including Historic England and Lincolnshire County Council. Requirement 11 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]** requires a written scheme of archaeological investigation to have been submitted to and approved by the relevant planning authority.
Paragraph 2.10.114	In some instances, field studies may include investigative work (and may include trial trenching beyond the boundary of the proposed site) to assess the impacts of any ground disturbance, such as proposed cabling, substation foundations or mounting supports for solar panels on archaeological assets.	The scope of fieldwork, such as the location and amount of trenching, has been consulted on and approved by the County Archaeologist at LCC, which includes the trial trench evaluation and the methodology included within the WSI (**Appendix 7-H: Written Scheme of Investigation for an Archaeological Evaluation** of the **ES [EN010154/APP/6.3]**). The results of which are presented within **Appendix 7-I: Trial Trenching Report (Interim)** of the **ES [EN010154/APP/6.3]**.
Paragraph 2.10.115	The extent of investigative work should be proportionate to the sensitivity of, and extent of proposed ground disturbance in, the associated study area	
Paragraph 2.10.116	Applicants should take account of the results of historic environment assessments in their design proposal	**Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]** presents the results of the assessment and the impact of the Proposed Development

Policy paragraph	Policy description	Compliance commentary
Paragraph 2.10.117	Applicants should consider what steps can be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting.	on the baseline environment in order to determine the anticipated magnitude of impact and significance of effect. Mitigation measures are presented and discussed to minimise the effects of the Proposed Development to acceptable levels and the findings of an assessment of the likely significant effects on cultural heritage as a result of the Proposed Development are presented. Mitigation measures have taken into account archaeological remains, designated assets and the historic landscape, as set out in Section 7.6 of **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]**. In summary, an iterative process, informed by assessment and survey work, has informed the development of the design of the Proposed Development in order to avoid or minimise potential significant adverse effects on the identified sensitive heritage receptors as far as practicable during the construction, operation and decommissioning of the Proposed Development. As set out in **Appendix 7-D: Detailed Heritage Asset Setting Assessment** of the **ES [EN010154/APP/6.3]**, an assessment of the potential effects of the Proposed Development upon the significance of designated and non-designated heritage assets, through the alteration of their settings, in accordance with Historic England's guidance on the Setting of Heritage Assets (2017a), has been carried out. The assessment concludes that the Proposed
Paragraph 2.10.118	As the significance of a heritage asset derives not only from its physical presence but also from its setting, careful consideration should be given to the impact of large-scale solar farms which depending on their scale, design and prominence, may cause substantial harm to the significance of the asset.	

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		Development will result in less than substantial harm (lower end) to the heritage significance of two designated heritage assets located within close vicinity of the DCO Site; Grade II Listed River Farmhouse (NHLE 1168186) and Grade II Listed Grange Cottage (NHLE 1061951. The assessment has also concluded that the Proposed Development will result in very limited harm to a non-designated heritage asset, Tonge's Farm (MLI119774). As set out in Section 4.3 of the **Design Approach Document [EN010154/APP/7.3]**, the design of the Proposed Development has taken account of the setting of heritage assets. Prior to the commencement of Statutory Consultation, a design change was made that resulted in the realignment of solar infrastructure around the Grade II listed River Farmhouse to follow historic field boundaries and maintain intervisibility between River Farmhouse and Church Farm (a non-designated monument) which forms the setting of these two heritage assets.
Paragraph 2.10.137	The ability of the applicants to microsite specific elements of the proposed development during the construction phase should be an important consideration by the Secretary of State when assessing the risk of damage to archaeology.	As set out in Section 7.8 of **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1],** the results of the archaeological excavations will be published and disseminated to the public in a manner proportionate to the nature of the importance of the discovered remains. The unavoidable loss of evidential value would be offset by the advancement of our understanding (enhanced historical
Paragraph 2.10.138	Where requested by the applicant, the Secretary of State should consider granting consents which allow for the micrositing within a specified tolerance of	

Policy paragraph	Policy description	Compliance commentary
	elements of the permitted infrastructure so that precise locations can be amended during the construction phase if unforeseen circumstances, such as the discovery of previously unknown archaeology, arise.	value) and the public benefits the dissemination of the results would deliver. These are industry standard (mitigation) and good practice responses to discovered (and important) buried archaeological remains and these responses are secured by Requirement 11 as detailed in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. The approximate 10km cable corridor is expected to require a 30m to 40m wide working area for the purposes of construction with a small number of wider areas up to 60m width, for example at the location of any required HDD entry and exit pits. The current proposed Cable Corridor is shown in **Figure 1-2: DCO Site** of the ES **[EN010154/APP/6.2].** The Cable Corridor has been subject to an iterative design process. A range of likely constraints have determined the final optimal cable routing. The Cable Corridor will be further refined during detailed design post consent of the DCO to take account of any unexpected, localised issues, including but not limited to archaeological finds, implications with respect to protected species and reducing impacts upon trees and hedgerows, for example. The strategy and approach for appropriate measures to mitigate the identified impacts from construction of the Proposed Development upon heritage assets of archaeological value, will be agreed with Lincolnshire

Policy paragraph	Policy description	Compliance commentary
		County Council, in consultation with Historic England, as provided for under Requirement 11 as detailed in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. Those measures could include: a. Areas where no components of the Proposed Development are proposed with appropriate measures in place to ensure no below ground impacts would be incurred. This is relevant to parts of the Principal Site devoid from any infrastructure, but also to Site Cabling, Cable Corridor and HDD areas (the detailed design of which would seek to avoid impacts on known archaeological remains where feasible); b. In exceptional cases, localised use of 'no-dig' construction solutions. These could comprise excluding discrete areas from Solar PV Arrays and associated infrastructure as well as creating 'archaeology exclusion zones' during construction. The 'no-dig' complimentary techniques involve ballast footings (such as concrete shoes) to avoid piling completely, or areas where cabling is excluded (to reduce any impacts to the low level piling only).
Paragraph 2.10.160	Solar farms are generally consented on the basis that they will be time-limited in operation. The Secretary of State should therefore consider the length of time for which consent is sought when considering the	The Proposed Development is proposed to be operational for 60 years and will be supported by an OEMP throughout that time as per Requirement 13 as detailed in Schedule 2

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	impacts of any indirect effect on the historic environment, such as effects on the setting of designated heritage assets	of the **Draft Development Consent Order [EN010154/APP/3.1]**. It is acknowledged that the Proposed Development would lead to less than substantial harm (at the lower end of the scale) to two designated heritage assets (River Farmhouse, Grange Cottage and one non-designated heritage asset (Tonge's Farm). However, as the policy acknowledges, the effects would be both temporary and reversible (albeit long term).
Construction including traffic and transport noise and vibration		
Paragraph 2.10.120	Modern solar farms are large sites that are mainly comprised of small structures that can be transported separately and constructed on-site, with developers designating a compound on-site for the delivery and assemblage of the necessary components.	**Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]** sets out the potential sites considered and assessed against a range of planning, environmental and operational criteria, including access. This includes the acknowledgement that due to the rural nature of the surrounding area, a number of the local roads are subject to restrictions (such as weight restrictions of below 7.5 tonnes). These factors have been considered when reviewing potential routes to minimise the impact of the Proposed Development on local roads. During the construction phase the Proposed Development will be served by several proposed Principal Site accesses. The Principal Site will have 13 different access points, and the Cable Corridor will be served by seven access points. The proposed access locations for the Proposed
Paragraph 2.10.121	Many solar farms will be sited in areas served by a minor road network. Public perception of the construction phase of solar farm will derive mainly from the effects of traffic movements, which is likely to involve smaller vehicles than typical onshore energy infrastructure but may be more voluminous.	
Paragraph 2.10.123	Applicants should assess the various potential routes to the site for delivery of materials and components where the source of the materials is known at the time of the application, and select the route that is the most appropriate.	

Policy paragraph	Policy description	Compliance commentary
Paragraph 2.10.124	Where the exact location of the source of construction materials, such as crushed stone or concrete is not be known at the time of the application applicants should assess the worst-case impact of additional vehicles on the likely potential routes.	Development are illustrated on **Figure 3-1: Construction Compound and Access Locations** of the ES **[EN010154/APP/6.2]**. The construction effects on traffic and transport are assessed in **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]**. Section 13.6 of this chapter outlines the embedded mitigation for the Proposed Development. This includes providing suitable points of access for construction vehicles with adequate visibility, with any supporting improvements (e.g. vegetation clearance) to take place within the highway boundary and the DCO Site if required, and delivering internal construction routes through the Principal Site, to allow vehicles to access all areas via the site access points. Further details of the construction process will be secured via the **Framework CEMP [EN010154/APP/7.7]** and secured under Requirement 12 in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]** and a detailed CTMP substantially in accordance with the **Framework CTMP [EN010154/APP/7.18]** secured under Requirement 14 in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 2.10.125	Applicants should ensure all sections of roads and bridges on the proposed delivery route can accommodate the weight and volume of the loads and width of vehicles. Although unlikely, where modifications to roads and/or bridges are required, these should be identified, and potential effects addressed in the ES	
Paragraph 2.10.126	Where a cumulative impact is likely because multiple energy infrastructure developments are proposing to use a common port and/or access route and pass through the same towns and villages, applicants	Section 13.10 of **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]** identifies those areas where the predicted effects of the Proposed Development could interact with effects arising from other plans or projects

Policy paragraph	Policy description	Compliance commentary
	should include a cumulative transport assessment as part of the ES. This should consider the impacts of abnormal traffic movements relating to the project in question in combination with those from any other relevant development. Consultation with the relevant local highways authorities is likely to be necessary	based on a spatial and/ or temporal basis. Section 13.10 concludes the peak hour and daily cumulative traffic flows fall below the 30% impact threshold defined by Rule 1 of the IEMA Guidelines for non-sensitive receptors. Therefore, the significance category is Neutral and the cumulative effects are considered to be Not Significant. Consultation has been ongoing with relevant highway authorities as described in the **Consultation Report [EN010154/APP/5.1]** and further mitigation measures are proposed for construction in the **Framework CEMP [EN010154/APP/7.7]** and **Framework CTMP [EN010154/APP/7.18]**, to be secured by requirements 12 and 14 in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 2.10.127	In some cases, the local highway authority may request that the Secretary of State impose controls on the number of vehicle movements to and from the solar farm site in a specified period during its construction and, possibly, on the routeing of such movements particularly by heavy vehicles	The **Framework CEMP [EN010154/APP/7.7]** and **Framework CTMP [EN010154/APP/7.18]**, to be secured by requirements 12 and 14 as detailed in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]** set out the proposed controls for traffic and transport construction. This includes timing restrictions, appropriate site access arrangements and necessary escorts (as set out in Section 7.3 of the **Framework CTMP [EN010154/APP/7.18]**).
Paragraph 2.10.140	Where the Secretary of State agrees that this is necessary, requirements could be imposed on development consent.	
Paragraph 2.10.141	Where cumulative effects on the local road network or residential amenity are predicted from multiple solar farm developments, it may be appropriate for	As described in Section 13.10 of **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]**, the cumulative effects expected on Traffic and Transport receptors within

Policy paragraph	Policy description	Compliance commentary
	applicants for various projects to work together to ensure that the number of abnormal loads and deliveries are minimised, and the timings of deliveries are managed and coordinated to ensure that disruption to residents and other highway users is reasonably minimised.	the Study Area during the construction phase are not significant. Although solar panels typically have a lifespan of 30-40 years and may therefore need to be replaced during the operational life of the Proposed Development, this would be programmed in stages over a much longer period than the construction phase with lower levels of daily vehicle activity. It is therefore not anticipated that there would be significant cumulative effects when considering this alongside the other schemes.
Paragraph 2.10.142	It may also be appropriate for the highway authority to set limits for and coordinate these deliveries through active management of the delivery schedules through the abnormal load approval process.	
Paragraph 2.10.143	Once consent for a scheme has been granted, applicants should liaise with the relevant local highway authority (or other coordinating body) regarding the start of construction and the broad timing of deliveries. Applicants may need to agree a planning obligation to secure appropriate measures, including restoration of roads and verges.	Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]** sets out the proposed requirements should consent be granted. This includes a detailed OEMP as per Requirement 13 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**, a detailed CTMP as per Requirement 14 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]** and detailed PRoW plan as per Requirement 18 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. The detailed CTMP will be submitted to and approved by the relevant planning authority, with approval given in consultation with the highway authority. Within the **Framework CTMP [EN010154/APP/7.18]**, Section 7.3 it sets out that a separate road condition survey may be carried out to identify any defects that arise to highways
Paragraph 2.10.144	Further it may be appropriate for any non-permanent highway improvements carried out for the development (such as temporary road widening) to be made available for use by other subsequent solar farm developments	

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		assets/ verges as a result of abnormal loads for re-instatement. Section 5.2 of the **Framework CTMP [EN010154/APP/7.18]** sets out all construction access points associated with the Principal Site are expected to be permanently in place during the operational phase for the lifetime of the development. The accesses to the Cable Corridor will be temporary, in use only during the construction phase and are expected to be reinstated to their original use during the operational phase. The proposed site layout for the construction phase, as well as the temporary construction compounds and the internal access tracks, are shown in **Figure 3-2A: Indicative Fix South Facing Layout** of the ES **[EN010154/APP/6.2]** and **Figure 3-2B: Indicative Single Axis Tracker Layout** of the ES **[EN010154/APP/6.2]**. Further details relating to the above are shown on the **Streets, Right of Way and Access Plans [EN010154/APP/2.3]**.
Paragraph 2.10.161	Once solar farms are in operation, traffic movements to and from the site are generally very light, in some instances as little as a few visits each month by a light commercial vehicle or car. Should there be a need to	Section 13.8 of **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]** supports this paragraph, stating effects are not expected during the operational phase of the

Policy paragraph	Policy description	Compliance commentary
	replace machine components, this may generate heavier commercial vehicle movements, but these are likely to be infrequent.	Proposed Development as the number of trips associated with this phase are expected to be minimal.
Paragraph 2.10.162	The Secretary of State is unlikely to give any more than limited weight to traffic and transport noise and vibration impacts from the operational phase of a project.	

National Policy Statement for Electricity Networks Infrastructure (EN-5) (November 2023)

Policy paragraph	Policy description	Compliance commentary
Paragraph 2.1.1	As set out in Section 1.3, this NPS is additional to EN-1. Therefore, applicants and the Secretary of State should consider this NPS and EN-1 together. Applicants should show how their application meets the requirements in EN-1 and this NPS, applying the mitigation hierarchy, as well as any other legal and regulatory requirements. This includes the assessment principles as set out in Part 4 of EN-1, and the consideration of impacts as set out in Part 5 of EN-1.	The Applicant has included consideration of NPS EN-5 throughout the application and within this part of the National Policy Accordance Tables. Consideration of NPS EN-1 is also provided at Appendix B of the **Planning Statement [EN010154/APP/7.2]**.
Site selection and design		
Paragraph 2.2.8	There will usually be a degree of flexibility in the location of the development's associated substations, and applicants should consider carefully their location, as well as their design.	The Applicant seeks to retain flexibility in the design as set out in Section 4.1 of the **Planning Statement [EN010142/APP/7.2]**. Detail on the flexibility sought is described in **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]**. To account for this flexibility and enable the optimal design of the Proposed Development post consent, the Rochdale Envelope approach has been adopted for environmental assessment. The Rochdale Envelope provides a framework for assessing the maximum (and where relevant, minimum) parameters, including the limits of deviation (e.g. development extents or specific maximum heights) as relevant, for the Proposed Development where
Paragraph 2.2.9	In particular, the applicant should consider such characteristics as the local topography, the possibilities for screening of the infrastructure and/or other options to mitigate any impacts. (See Section 2.10 below and Section 5.10 in EN-1.)	

Policy paragraph	Policy description	Compliance commentary
		flexibility needs to be retained. This approach also ensures that the worst-case scenario is assessed. A full explanation of site selection is set out in **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]**. The report concludes that the location of the Proposed Development comprises a suitable site taking into account planning and environmental constraints and operational considerations. The **Design Approach Document [EN010154/APP/7.3]** and **Chapter 4: Alternatives and Design Evolution** of the ES **[EN010154/APP/6.1]** explain the design evolution of the Proposed Development. Section 10.6 of **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** details the embedded mitigation measures incorporated into the Proposed Development, which include: a. Careful siting in the landscape; b. Conserving existing vegetation patterns; c. Creating new green infrastructure; d. Sensitive design of lighting; e. Careful design of lighting; and f. Management measures (to provide management and maintenance in order to provide the intended effect).

Policy paragraph	Policy description	Compliance commentary
		These measures will be implemented using the **Framework Landscape and Ecological Management Plan** (LEMP) **[EN010154/APP/7.15]** and will be secured via Requirement 8 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 2.2.10	As well as having duties under Section 9 of the Electricity Act 1989, (in relation to developing and maintaining an economical and efficient network), applicants must take into account Schedule 9 to the Electricity Act 1989, which places a duty on all transmission and distribution licence holders, in formulating proposals for new electricity networks infrastructure, to "*have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and …do what [they] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects.*"	While noting that the Applicant is not a transmission and distribution licence holder, footnote 9 of this paragraph notes that in the rare case that the developer is not a licence-holder, the developer will nonetheless be influenced by the duties laid out in Section 9, even though they are not themselves under obligation. The Proposed Development has had regard to such flora, fauna, features, sites, features, buildings or objects**. Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]** explains that the site selection process sought to avoid impacts to designated ecological and geological sites. It is considered that the location of the Proposed Development comprises a suitable site taking into account planning and environmental constraints and operational considerations. There are no statutory ecology designations such as Sites of Special Scientific Interest (SSSIs), Special Areas of Conservations (SACs), Special Protection Areas (SPAs) located within the Order Limits. Additionally, there are no Local Wildlife Sites (LWS). Further details of ecology within and surrounding the Order Limits is reported in **Chapter 8:**

Policy paragraph	Policy description	Compliance commentary
		Ecology and Nature Conservation of the ES **[EN010154/APP/6.1]**. **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** assesses the 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, including irreplaceable habitats. The assessment methodology is detailed in Section 8.5 of the chapter. **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** concludes there are no significant adverse effects identified in the construction, operation or decommissioning of the Proposed Development. Opportunities to conserve and enhance biodiversity are demonstrated throughout **Chapter 8 Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** which describes how biodiversity has been integral to the design and layout of the Proposed Development. It will safeguard protected species, and habitat features through the use of buffers and offsets which has allowed the Proposed Development to protect species and avoid direct or indirect impacts to habitats. The Order Limits have been refined to exclude sensitive areas of ancient woodland, such as Stocking Wood, which is outside of the Order Limits. The Proposed Development also makes provision bird mitigation comprising 64ha of permanent grassland and 181ha of retained arable for Skylark and Lapwing, as presented in

Policy paragraph	Policy description	Compliance commentary
		Figure 8-5: Bird Mitigation Land Allocation of the ES **[EN010154/APP/6.2]** and secured in the **Framework LEMP [EN010154/APP/7.15]**. **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]** presents the assessment findings of the likely significant effects on cultural heritage, as a result of the Proposed Development; which includes impacts to archaeology and designated heritage assets, historic buildings and historic landscape elements. Embedded mitigation measures are set out in Section 7.6 of this chapter and include the use of offsets/buffers, containing the Proposed Development within existing field boundaries, new tree and hedgerow planting and good practice measures regarding the protection of buried archaeological remains during construction and decommissioning works. The assessment set out in **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]** concludes that there would be no adverse effects. Notwithstanding, the Proposed Development will lead to less than substantial harm (at the lower end of the scale) to the significance of two designated heritage assets and one non-designated asset. However, it has been demonstrated that the substantial benefits of the Proposed Development outweigh the harm to these assets.
Climate Change adaption and resilience		
Paragraph 2.3.1	Section 4.10 of EN-1 sets out the generic considerations that applicants and the Secretary of State should take into account in order to ensure that	**Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** demonstrates how residual effects during operation and decommissioning can be mitigated as far as possible. The in-

Policy paragraph	Policy description	Compliance commentary
	electricity networks infrastructure is resilient to the effects of climate change.	combination assessment concludes no residual significant effects.
Paragraph 2.3.2	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 has been designed to be resilient to: • flooding, particularly for substations that are vital to the network; and especially in light of changes to groundwater levels resulting from climate change; • the effects of wind and storms on overhead lines; • higher average temperatures leading to increased transmission losses; • earth movement or subsidence caused by flooding or drought (for underground cables); and • coastal erosion – for the landfall of offshore transmission cables and their associated substations in the inshore and coastal locations respectively	Measures to reduce and provide resilience to climate change and mitigate the impact of the Proposed Development on the climate are set out in the **Framework Construction Environmental Management Plan** (CEMP) **[EN010154/APP/7.7], Framework Operational Environmental Management Plan** (OEMP) **[EN010154/APP/7.8],** and **Framework Decommissioning Environmental Management Plan** (DEMP) **[EN010154/APP/7.9],** from which detailed versions of these plans will be secured via Requirements 12, 13 and 20 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Paragraph 2.3.3	Section 4.10 of EN-1 advises that the resilience of the project to the effects of climate change must 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 Sections 5.8 in EN-1).	**Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** assesses the climate change impacts of the Proposed Development and includes a Change Resilience Review and an In-Combination Climate Change Impact Assessment. The likely effects of the Proposed Development associated with flood risk have been assessed in **Chapter 9: Water**

Policy paragraph	Policy description	Compliance commentary
	Consideration should also be given to coastal change (see section 5.6 in EN-1).	**Environment** of the ES **[EN010154/APP/6.1]**. **Appendix 9-C: Flood Risk Assessment** of the ES **[EN010154/APP/6.3]** includes a Flood Risk Assessment (FRA) which has been prepared in accordance with the requirements of Section 5.8 of EN-1 (and the NPPF). As discussed in **Appendix 9-C: Flood Risk Assessment** of the ES **[EN010154/APP/6.3]**, there is no permanent above ground infrastructure, other than solar PV panels, that will be located within Flood Zone 2 and 3. All other permanent above ground infrastructure and operational phase site compounds within the Principal Site will be located in Flood Zone 1. The FRA demonstrates flood risk, from all sources, will not increase as a result of the Proposed Development, within the DCO Site or elsewhere, with the proposed embedded mitigation in place. In summary, fluvial flood risk is not increased as a result of the Proposed Development, to the Proposed Development or elsewhere. A Framework Surface Water Drainage Strategy in **Appendix 9-D: Framework Surface Water Drainage Strategy** of the ES **[EN010154/APP/6.3]** demonstrates how surface water drainage will be managed effectively to ensure there is no increase in surface water runoff from the Proposed Development above the existing regime.
Consideration of good design for energy infrastructure		
Paragraph 2.4.2	Applicants should consider the criteria for good design set out in EN-1 Section 4.7 at an early stage when developing projects.	The **Design Approach Document [EN010154/APP/7.3]** and **Chapter 4: Alternatives and Design Evolution** of the ES **[EN010154/APP/6.1]** explain the design evolution of the Proposed Development. The compliance of the Proposed

Policy paragraph	Policy description	Compliance commentary
		Development with the NPS EN-1 policy in relation to good design is set out in **Appendix B: National Policy Accordance Tables** of the **Planning Statement [EN010154/APP/7.2].** This includes detail of the Applicant's compliance with the criteria in 4.7 of NPS EN-1, which relates to the achievement of good design. Section 2.2 of the **Design Approach Document [EN010154/APP/7.3]** details the key considerations for good design as stated in NPS EN-1. The accordance of the design process with good design as defined in EN-1 is subsequently set out within Section 3 of the **Design Approach Document [EN010154/APP/7.3]**, which includes but is not limited to, the appointment of a design champion; establishment of Design Principles; and consideration of the site context.
Paragraph 2.4.3	However, the Secretary of State should bear in mind that electricity networks infrastructure must in the first instance be safe and secure, and that the functional design constraints of safety and security may limit an applicant's ability to influence the aesthetic appearance of that infrastructure.	As set out in **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]**, safety has been an important consideration in the design of the Proposed Development. This includes providing security measures such as CCTV and fencing and a **Framework Battery Safety Management Plan [EN010154/APP/7.17]** to support the DCO application which sets out the parameters for the management of fire risk associated with the BESS. It is acknowledged there are constraints associated with the external appearance of infrastructure, however, as set out in the **Design Approach Document [EN010154/APP/7.3]**,through carefully developing the design of the Proposed Development in response to the

Policy paragraph	Policy description	Compliance commentary
		baseline analysis and the opportunities identified, the Applicant has achieved a design that responds positively to its location, delivers substantial benefits, keeps negative impacts to a minimum and makes valuable enhancements to the local area. This includes an appearance that demonstrates good aesthetic as far as possible.
Environmental and Biodiversity Net Gain		
Paragraph 2.5.1	When planning and evaluating the proposed development's contribution to environmental and biodiversity net gain, it will be important – for both the applicant and the Secretary of State – to supplement the generic guidance set out in EN-1 (Section 4.6) with recognition that the linear nature of electricity networks infrastructure can allow for excellent opportunities to: i. reconnect important habitats via green corridors, biodiversity stepping zones, and reestablishment of appropriate hedgerows; and/or ii. connect people to the environment, for instance via footpaths and cycleways constructed in tandem with environmental enhancements.	In line with **Figure 7.15 Landscape Mitigation Plan** (presented within the **Framework LEMP [EN010154/APP/7.15]**), one of the overarching aims in the **Framework LEMP [EN010154/APP/7.15]** is to deliver habitat creation and management with the aim of providing significant ecological enhancements while strengthening green infrastructure within the area. This will be achieved through improvements to hedgerows, tree and shrub planting and restoration of ponds which will improve landscape structure and ecological connectivity. Measures proposed in the **Framework LEMP [EN010154/APP/7.15]** such as the management of existing trees, shrubs and woodland, and species choice in the implementation of new habitats (woodland, tree belts, hedgerows and the community orchard) will improve resilience to climate change. The Proposed Development will also create a number of new permissive paths across the Principal Site to link existing routes and create new and enhance existing connections to surrounding villages:

Policy paragraph	Policy description	Compliance commentary
		a. Route from Tunman Wood linking to PRoW LL/TOTH/11/1 to the east of Morton. b. Route from Tunman Wood to Fosse Lane including a link to the Cathedral View Caravan Park linking with PRoW LL/TOTH/6A/1. c. Cathedral View Caravan Park to Fosse Lane, providing a circular walk and safer route and access to Thorpe-on-the-Hill for residents. d. East of Witham St Hughs, providing a circular walk around the proposed community orchard and linking to PRoW LL/AUbo/11/2. e. Route south of Thurlby linking to PRoW LL/ThuN/2/1. f. West of Bassingham providing a circular walk and linking to PRoW LL/NoDi/1/2. The Proposed Development will minimise construction impacts by maintaining access to and along PRoW and the existing permissive paths or otherwise providing temporary or permanent PRoW and permissive path diversion routes where necessary to avoid any closures or potential conflicts with the Proposed Development where possible. However, it is acknowledged that the Proposed Development would require the long-term closure and diversion of the following PRoW: a. LL/Aubo/10/1 PRoW; b. LL/TOTH/13/1 PRoW; and

Policy paragraph	Policy description	Compliance commentary
		c. LL/ThuN/2/1. Given the large network of PRoWs, roads and existing permissive paths in the area that could be used as substitutes, the sensitivity of the PRoWs being assessed to be low and the short journey increases, the effects would be negligible. A **Framework Public Rights of Way Management Plan [EN010154/APP/7.14]** has been prepared as part of the DCO application which details the mitigation measures which will be used to reduce the impacts of the Proposed Development on PRoW.
Land Rights and Land Interests		
Paragraph 2.6.1	In order to be lawfully able to install, inspect, maintain, repair, adjust, alter, replace or remove an electricity line (above or below ground), its related equipment (such as monopoles, pylons/transmission towers, transformers and cables), and/or its associated mitigation or enhancement schemes, applicants must: own the land on, over, or under which the relevant activity is to take place; or ii. hold sufficient rights over or interests in that land (typically in the form of an easement); or . iii. have permission for the activity from the present owner or occupier of that land (typically in the form of a wayleave).	The Applicant has sought to secure the rights over land (temporary and permanent) through voluntary negotiations. The **Draft Development Consent Order [EN010154/APP/3.1]** also seeks compulsory acquisition powers over land if it cannot be secured through voluntary agreement. The rights being sought to construct, operate and decommission the Proposed Development are set out in the **Draft Development Consent Order [EN010154/APP/3.1], Schedule of Negotiations and Powers Sought at Annex A to** the **Statement of Reasons [EN010154/APP/4.1]** and the **Book of Reference [EN010154/APP/4.3]**. Temporary land rights were secured to allow surveys to be undertaken which have informed and are described within the ES.
Paragraph 2.6.2	Where the applicant does not own or wish to own the land in question, it should try to reach a voluntary	The cable easements the Applicant is seeking will have a fixed term and no break clause from the landowner side i.e.

Policy paragraph	Policy description	Compliance commentary
	agreement giving it sufficient rights and/or permissions to undertake the relevant work	the landowner will not be able to serve notice and terminate the easement.
Paragraph 2.6.3	As a last resort, where it does not succeed in reaching the agreement that it requires, the network company may, as part of its application to the Secretary of State, seek to acquire rights compulsorily over the land in question by means of a provision in the DCO.	
Paragraph 2.6.4	In such cases (i.e. where the compulsory acquisition of rights is sought) permanent arrangements are strongly preferred over voluntary wayleaves (which could, for example, be terminable on notice by the landowner) in virtue of their greater reliability and economic efficiency and reflecting the importance of the relevant infrastructure to the nation's net zero goals	
Paragraph 2.6.5	The applicant may also seek the compulsory acquisition of land. This will not normally be necessary where lines and cables are installed but may be sought where other forms of electricity networks infrastructure (such as new substations) are required.	
Paragraph 2.6.6	As detailed in Section 4.1.8 of EN-1, where the use of land at a specific location is required to facilitate the development by providing for mitigation, landscape enhancement and biodiversity net gain, an applicant may, as part of its application to the Secretary of State, seek the compulsory acquisition of that land, or rights over that land. The Secretary of State will	

Policy paragraph	Policy description	Compliance commentary
	consider any such application under the provisions of the Planning Act 2008 and any associated guidance.1	
Paragraph 2.6.7	Ahead of securing land rights or interests for transmission infrastructure development itself, an applicant will, in many cases, need to obtain access to land to conduct technical and environmental surveys to inform their development proposals. Some of these will be seasonal species surveys meaning there are limited opportunities during the course of the year in which they can be undertaken; timely access for surveys can have a significant impact on overall project timelines.	
Strategic Network Planning		
Paragraph 2.8.4	The Secretary of State should also take into account that Transmission Owners (TOs) and 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.	The Applicant submitted an application for the grid connection and received a grid connection offer from National Grid Electricity System Operator Limited (NGESO) to connect the Proposed Development to the National Electricity Transmission System (NETS) at the proposed National Grid Substation near Navenby. Further details are included in the **Grid Connection Statement [EN010142/APP/7.5]**.
Paragraph 2.8.5	TOs and DNOs are also required to facilitate competition in the generation and supply of electricity, and electricity distributors have a statutory duty to provide a connection where requested.	
Paragraph 2.9.38	Audible noise effects can also arise from substation equipment such as transformers, quadrature boosters and mechanically switched capacitors.	**Chapter 11: Noise and Vibration** of the ES **[EN010154/APP/6.1]** provides an assessment of the noise and vibration impacts from construction, operation and decommissioning of the Proposed Development. **Chapter 11: Noise and Vibration** of the ES **[EN010154/APP/6.1]**
Paragraph 2.9.38	Transformers are installed at many substations, and generate low frequency hum. Whether the noise can	

Policy paragraph	Policy description	Compliance commentary
	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).	concludes that there are no likely significant effects during construction with the exception of residual precautionary likely significant construction vibration effects identified at three residential receptors during piling for solar structures. The effect is precautionary as calculations are based on percussive piling rigs from BS 5228-2 as vibration data for mini-piling rigs used for solar PV structures is not available. As such, construction vibration effects are likely to be overestimated. No likely significant effects are predicted for the operation and decommissioning stages. For the purpose of the assessment in **Chapter 11: Noise and Vibration** of the ES **[EN010154/APP/6.1]**, plant are assumed to operate continuously so there will not be any noticeable impulsive or intermittent characteristics from plant noise emissions experienced at the surrounding receptors. Transformers can have tonal features, although noise emissions from central inverters will be dominated by the cooling fans such that any tonal features of the transformers will not be noticeable. Measures to mitigate noise and vibration impacts are embedded into the design of the Proposed Development and further management of potential impacts is secured through measures identified in the **Framework CEMP [EN010154/APP/7.7]**, **Framework OEMP [EN010154/APP/7.8], Framework Construction Traffic Management Plan** (CTMP) **[EN0101054/APP/7.18]** and **Framework DEMP [EN010154/APP/7.9] ,** detailed versions

Policy paragraph	Policy description	Compliance commentary
		of these plans will be secured via Requirements 12, 13, 14 and 20 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. These all include standard good practice measures such as use of Best Practical Means to reduce disturbance associated with noise and vibration during construction as far as reasonably practicable.
Applicants Assessment		
Paragraph 2.9.39	For the assessment of noise from substations, standard methods of assessment and interpretation using the principles of the relevant British Standards are satisfactory.	The assessment of noise impacts set out in **Chapter 11: Noise and Vibration** of the ES **[EN010154/APP/6.1]** has been undertaken in accordance with British Standards guidance.
Paragraph 2.9.59	Sulphur Hexafluoride (SF6) is an insulating and arc-suppressant gas used in high-voltage switchgear for electricity networks.	The Applicant has designed the Proposed Development to avoid the use of SF6-reliant assets as far as possible. For example, the Proposed Development has been designed to include an air insulated switchgear and transformers at the substation, which do not include SF6 instead of a gas insulated switchgear that does. The Greenhouse Gas (GHG) Assessment set out in **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** covers the construction, operation and decommissioning GHG impacts and considers the potential for leakage of SF6 and other potent GHGs during manufacture of component parts and operation of the Proposed Development. **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** concludes that the effects of GHG emissions arising from construction and decommissioning are anticipated to result
Paragraph 2.9.60	It is also an extraordinarily potent greenhouse gas, and fugitive emissions from electricity networks infrastructure are an object of increasing environmental concern, especially in light of the UK's commitment to net zero by 2050.	
Paragraph 2.9.61	Applicants should at the design phase of the process consider carefully whether the proposed development could be reconceived to avoid the use of SF6-reliant assets	
Paragraph 2.9.62	Where the development cannot be so conceived, the applicant must provide evidence of their reasoning on this point. Such evidence will include, for instance, an explanation of the alternatives considered, and a case why these alternatives are technically infeasible	

Policy paragraph	Policy description	Compliance commentary
	or require bespoke components that are grossly disproportionate in terms of cost.	in minor adverse, but with mitigation measures, non-significant effects. The operational phase of the Proposed Development is considered to have one significant effect which is beneficial. This is due to the net GHG impacts being below zero and resulting in a reduction in the atmospheric GHG concentration when compared to a without-project baseline, where net zero is substantially exceeded.
Paragraph 2.9.63	In particular, an accounting of the cost differential between the SF6-reliant asset and the appropriate SF6-free alternative should be provided.	
Paragraph 2.9.64	Where applicants, having followed the above procedure, do propose to put new SF6-reliant assets onto the electricity system, they should design a plan for the monitoring and control of fugitive SF6 emissions consistent with the Fluorinated gas (F-gas) Regulation and its successors.	
Paragraph 2.10.14	The climate-warming potential of SF6 is such that applicants should, as a rule, avoid the use of SF6 in new developments.	
Paragraph 2.10.15	Where no proven SF6-free alternative is commercially available, and where the cost of procuring a bespoke alternative is grossly disproportionate, the continued use of SF6 is acceptable, provided that emissions monitoring and control measures compliant with the F-gas Regulation and/or its successors are in place.	
Paragraph 2.10.8	Furthermore, since long-term management of the selected mitigation schemes is essential to their mitigating function, a management plan, developed at least in outline at the conclusion of the examination, and which sets out proposals within a realistic timescale, should secure the integrity and benefit of these schemes. This should also uphold the	As part of the design process, a range of additional habitat creation and enhancement measures have also been identified. Measures seek to strengthen existing habitat networks and maximise benefits to local wildlife, with a focus on protected species and those targeted for conservation action. These are set out in the **Framework LEMP [EN010154/APP/7.15]**. The **Biodiversity Net Gain Report**

Policy paragraph	Policy description	Compliance commentary
	landscape commitments made to achieve consent, alongside any pertinent commitments to environmental and biodiversity net gain.	**[EN010154/APP/7.12]** demonstrates that on the basis of the illustrative design, the Proposed Development will deliver 30% Biodiversity Net Gain (BNG) in habitat units, 50% BNG in hedgerow units and 10% BNG in watercourse units which is secured via Requirement 8 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Electric and Magnetic Fields		
Paragraph 2.10.11	The applicant should consider the following factors: • height, position, insulation and protection (electrical or mechanical as appropriate) measures subject to ensuring compliance with the Electricity Safety, Quality and Continuity Regulations 2002; • that optimal phasing of high voltage overhead power lines is introduced wherever possible and practicable in accordance with the Code of Practice to minimise EMFs; and any new advice emerging from the Department of Health and Social Care relating to government policy for EMF exposure guidelines	Relevant up to date legislation, planning policy and guidance has been taken into account in the assessment of Electric and EMF in **Appendix 14-F: Electromagnetic Fields Assessment** of the ES **[EN010154/APP/6.3].** **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]** confirms there are no overhead power lines used or constructed as part of the Proposed Development.
Secretary of State decision making		
Paragraph 2.11.7	The Secretary of State should ensure that appropriate assessment methodologies have been used in the evidence presented to it, and that the appropriate mitigation options have been considered and adopted. Where the applicant can demonstrate that appropriate mitigation measures will be put in	**Chapter 11: Noise and Vibration** of the ES **[EN010154/APP/6.1]** provides an assessment of the noise and vibration impacts from construction, operation and decommissioning, of the Proposed Development. **Chapter 11: Noise and Vibration** of the ES **[EN010154/APP/6.1]** concludes that there are no likely significant effects during

Policy paragraph	Policy description	Compliance commentary
	place, the residual noise impacts are unlikely to be significant.	construction with the exception of residual precautionary likely significant construction vibration effects identified at three residential receptors during piling for solar structures. The effect is precautionary as calculations are based on percussive piling rigs from BS 5228-2 as vibration data for mini-piling rigs used for solar PV structures is not available. As such, construction vibration effects are likely to be overestimated. No likely significant effects are predicted for the operation and decommissioning stages. Measures to mitigate noise and vibration impacts are embedded into the design of the Proposed Development and further management of potential impacts is secured through measures identified in the **Framework CEMP [EN010154/APP/7.7]**, **Framework OEMP [EN010154/APP/7.8],** **Framework CTMP [EN0101054/APP/7.18]** and **Framework DEMP [EN010154/APP/7.9]** and as secured via Requirements 12, 13, 14 and 20 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. These all include standard good practice measures such as use of Best Practical Means to reduce disturbance associated with noise and vibration during construction as far as reasonably practicable.
Paragraph 2.11.13	Undergrounding of a line would reduce the level of EMFs experienced, but high magnetic field levels may still occur immediately above the cable. It is the government's policy that power lines should not be	With regard to the impact of EMFs, Section 14.8 of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** concludes the assets associated with

Policy paragraph	Policy description	Compliance commentary
	undergrounded solely for the purpose of reducing exposure to EMFs	the Proposed Development would be fully compliant with the relevant Government policy. Specifically, all the EMFs produced would be below the relevant exposure limits. Therefore, no significant EMF effects are anticipated as a result of the Proposed Development.
Paragraph 2.11.14	In order to avoid unacceptable adverse impacts of EMFs from electricity network infrastructure on aviation, the Secretary of State will take account of statutory technical safeguarding zones defined in accordance with Planning Circular 01/03, or any successor, when considering recommendations for DCO applications. More detail on this issue can be found in Section 5.5 of EN-1.	
Paragraph 2.11.15	Where a statutory consultee on the safeguarding of technical facilities identifies a risk that the EMF effect of electricity network infrastructure would compromise the effective and safe operation of such facilities, the potential impact and siting and design alternatives will need to have been fully considered as part of the application	
Paragraph 2.14.2	In the assessments of their designs, applicants should demonstrate: • how environmental, community and other impacts have been considered and how adverse impacts have followed the mitigation hierarchy i.e. avoidance, reduction and mitigation of adverse impacts through good design; • how enhancements to the environment post construction will be achieved including demonstrating consideration of how proposals can contribute towards biodiversity net gain (as set out	The design approach for the Proposed Development is explained in full in the **Design Approach Document [EN010154/APP/7.3]**. The design seeks to balance the need to maximise renewable energy generation from the Proposed Development, whilst minimising potential adverse impacts and providing mitigation and enhancement measures through the mitigation hierarchy. Design Commitments are secured via Requirement 6 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.

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	in Section 4.5 of EN-1 and the Environment Act 2021), as well as wider environmental improvements in line with the Environmental Improvement Plan and environmental targets (paragraph 4.2.29 of EN-1); • how the construction planning for the proposals has been co-ordinated with that for other similar projects in the area on a similar timeline; • how enhancements to the landscape and environmental assets may contribute to overall landscape and townscape quality as set out in EN 14.6.13 and 5.10.23; • how the mitigation hierarchy has been followed, in particular to avoid the need for compensatory measures for coastal, inshore and offshore developments affecting SACs SPAs, and Ramsar sites and MCZs as set out in EN-3 2.8; • For designated landscapes the principal mitigation measure, as established by the Holford Rules, should be to seek to avoid landfall in these areas.	Through the application of a clear Design Vision and Design Principles which provided a framework for design evolution, as set out in the **Design Approach Document [EN010154/APP/7.3]**, the Proposed Development delivers positive design outcomes in terms of delivery of sustainable infrastructure that is sensitive to place, the provision of a landscape strategy, enhanced green infrastructure and BNG, and through increased opportunities for accessibility. The **Design Approach Document [EN010154/APP/7.3]** also demonstrates how good design measures are secured in the **Draft Development Consent Order [EN010154/APP/3.1],** the **Works Plans [EN010154/APP/2.2],** the **Proposed Development Parameters [EN010154/APP/7.4]**, and the **Framework LEMP [EN010154/APP/7.15]** secured via requirements 6 and 8 of Schedule 2 of **the Draft Development Consent Order [EN010154/APP/3.1]**.

National Planning Policy Framework (2024)

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Section 2: Achieving Sustainable Development	The NPPF sets out that planning policies and decisions should play an active role in guiding development towards sustainable solutions. Paragraph 10 of the NPPF states that at its heart is a "*presumption in favour of sustainable development*". Paragraph 7 sets out "*At a very high level the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own need.*" in reference to Resolution 42/187 of the United Nations General Assembly. Paragraph 11 expands on this, stating: "*…For decision-taking this means:* *c) approving development proposals that accord with an up-to-date development plan without delay."*	The **Statement of Need [EN010154/APP/7.1]** and Section 5 of the **Planning Statement [EN010154/APP/7.2]** demonstrates the contribution the Proposed Development, if consented, will have in sustainable development, through generating a significant amount of low carbon electricity over its 60-year lifetime thus supporting the resilience, security, and affordability of electricity supplies. It would be a critical part of the national portfolio of renewable energy generation that is required to decarbonise its energy supply quickly.
Section 8: Promoting Health and Safe Communities	Paragraph 96 states that "*Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:* *…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 well-designed, clear and legible pedestrian and cycle*	Potential effects to human health are considered in the ES technical chapters, with no adverse impacts anticipated. The benefits of the Proposed Development, as detailed in Section 5 of the **Planning Statement [EN010154/APP/7.2]**, include ecological enhancements, provision of permissive paths, job creation and economic benefits.

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	routes, and high quality public space, which encourage the active and continual use of public areas; and *c) enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities – 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*." Section 8 also relates to Public Rights of Way and states at Paragraph 105 that "*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".*	Section 3.3 of **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]** provides details of security measures, which include fencing, inward facing CCTV and operational lighting, to ensure that the site is secure. As set out in Design Principle 10 of the **Design Approach Document [EN010154/APP/7.3]**, the design of the Proposed Development has sought to enhance the existing connectivity within the network of PRoW. The **Framework Public Rights of Way Management Plan (PRoW Management Plan) [EN010154/APP/7.14]** confirms the betterment of user facilities through having taken opportunities to enhance PRoWs; this includes the creation of approximately 9.5km of new permissive paths to provide new links within, and additional links to, the existing network. A detailed version of the **Framework PRoW Management Plan [EN010154/APP/7.14]** will be produced and secured via Requirement 18 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. The measures will be managed through the **Framework Construction Environmental Management Plan (CEMP) [EN010154/APP/7.7]**, **Framework Construction Traffic Management Plan (CTMP) [EN010154/APP/7.18]**, **Framework Operational Environmental Management Plan (OEMP) [EN010154/APP/7.8]** and **Framework**

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		Decommissioning Environmental Management Plan (DEMP) [EN010154/APP/7.9]. Detailed versions of these plans will be produced and secured via requirements 12, 14, 13, and 20 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Section 12: Achieving Well Designed Places	Paragraph 131 states that "*The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.*"	The **Design Approach Document [EN010154/APP/7.3]** demonstrates the Applicant's commitment to high quality and good design and how the design of the Proposed Development has evolved to reflect the site context and outcomes of the environmental assessment; technical engagement with stakeholders; the feedback received at both Statutory and Non-Statutory consultation; and how it aligns with the design vision. Section 3.8 of the **Design Approach Document [EN010154/APP/7.3]** sets out the Design Principles which have been adopted to ensure good design has been embedded within the Proposed Development from inception and to explain how the design has evolved having regard to relevant policy, characteristics of the site, and feedback from consultation. The Applicant undertook a review of national and local policy and guidance to ensure good design principles were embedded into the Proposed Development at an early stage. The site selection process is set out in **Appendix A: Site Selection Report** of the **Planning Statement**

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		[EN010154/APP/7.2]. Sections 4.5 to 4.9 of **Chapter 4: Alternatives and Design Evolution** of the ES **[EN010154/APP/6.1]** present consideration of alternative proposals for the infrastructure associated with the Proposed Development. **Table 4-2**: Design Layout Iterations for the Principal Site and Cable Corridor, of this chapter explains the evolution of the design and the rationale for key decisions in accordance with the design principles as set out within Section 3.8 of the **Design Approach Document [EN010154/APP/7.3]**.
Section 12: Achieving Well Designed Places	Paragraph 135 states that "*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*	The Proposed Development demonstrates accordance with this policy through a number of design considerations and measures. The following response addresses each section of this paragraph individually. **Section A** Section 4.5 of the **Design Approach Document [EN010154/APP/7.3]** sets out how the design of the Proposed Development will deliver positive outcomes as sustainable infrastructure which is sensitive to its place. These will be realised in several ways and include, but are not limited to the Proposed Development's: a. Landscape strategy; b. Green infrastructure; c. Biodiversity Net Gain (BNG); and

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	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.*"	d. Enhancements to accessibility across and within the DCO Site. These measures are set out within the **Framework Landscape and Ecology Management Plan (LEMP) [EN010154/APP/7.15]**, **Framework CEMP [EN010154/APP/7.7],** and the **Streets, Rights of Way and Access Plans [EN010154/APP/2.3]**. Detailed versions of these framework plans will be produced and secured via requirements 8 and 12 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. **Section B** In accordance with NPS EN-1, the design of the Proposed Development has resulted in sustainable infrastructure that is sensitive to place, matched by an appearance that demonstrates good aesthetic as far as possible. Paragraph 4.7.2 of NPS EN-1 recognises that the nature of energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area. **Section C** Section 3.9 of the **Design Approach Document [EN010154/APP/7.3]** demonstrates how the local character and history of the area were considered from an

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		early design phase through their inclusion within the Design Principles, in particular Design Principles 1 and 5. As set out within Section 6 of the **Planning Statement [EN010154/APP/7.2]**, early consideration of landscape and visual effects was further made through the site selection process, as detailed within **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2],** with this having considered the outcomes of the landscape and visual assessments as detailed within **Appendix 10-E: Landscape Assessment** of the ES **[EN010154/APP/6.3]** and **Appendix 10-F: Visual Assessment** of the ES **[EN010154/APP/6.3].** These assessments included consideration of both natural and historic elements of the landscape and visual amenity with regard to the local character of the area; resultantly during the site selection process sites located within the AGLV were afforded less weight. The sympathetic nature of the design, and evolution of the Proposed Development is presented within **Chapter 4: Alternatives and Design Evolution** of the ES **[EN010154/APP/6.1]**; with key changes set out in **Table 4-2** and summarised in Section 4.11, which detail how the design evolved to minimise impacts to the landscape and visual amenity. Details of specific embedded and additional mitigation measures in relation to minimising

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		impacts to the landscape and visual amenity, including the local character and history, are set out within Section 10.6 and 10.8 of **Chapter 10 Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]**; and Section 7.6 and 7.8 of **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]**. These measures collectively are set out and managed within the **Framework LEMP [EN010154/APP/7.15]**, **Framework CEMP [EN010154/APP/7.7]**, and **Framework DEMP [EN010154/APP/7.9]**, and include the careful siting of the Proposed Development in the landscape; conserving existing vegetation patterns through ensuring their longevity is not compromised; and creating new green infrastructure, including grassland, hedgerows, trees and shrubs. Detailed versions of these plans will be produced in accordance with the framework plans and secured via requirements 8, 12, and 20 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. As confirmed within Section 6.3 of the **Planning Statement [EN010154/APP/7.2]**, all reasonable steps have been taken to avoid, reduce, and where necessary mitigate impacts to the landscape and visual amenity, and whilst some moderate to adverse impacts to the landscape character and visual amenity do remain, the harm is

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		tempered by other instances where existing landscape and visual impacts are improved. **Section D** It is acknowledged there are constraints associated with the external appearance of infrastructure, however, as set out in the **Design Approach Document [EN010154/APP/7.3]**, through carefully developing the design in response to the baseline analysis and the opportunities identified, the Applicant has achieved a design that responds positively to its location, delivers substantial benefits, keeps negative impacts to the minimum and makes valuable enhancements to the local area. This includes an appearance that demonstrates good aesthetic as far as possible. **Section E** In terms of a mix of developments, the Proposed Development includes both energy generation and BESS, as well as providing and retaining public and green space, and enhancing biodiversity and soil quality within the Order Limits. The Proposed Development also provides enhancements to green infrastructure through improvements to hedgerows, tree and shrub planting and restoration of ponds which are set out within the

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		Framework LEMP [EN010154/APP/7.15], of which a detailed version in accordance with the framework plan will be produced and secured via Requirement 8 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. Embedded mitigation measures in relation to agricultural land use within the Order Limits are set out within **Chapter 12: Socio-Economics and Land Use** of the ES **[EN010154/APP/6.1]**, which details the design of panels to accommodate sheep grazing to improve soil structure during the operational phase of the Proposed Development. Further to this, the **Framework PRoW Management Plan [EN010154/APP/7.14]** sets out how the Proposed Development will protect existing PRoW as well as expanding the network through the addition of new routes. **Section F** Additionally, these measures contribute to ensuring the design of the Proposed Development is safe, inclusive, and accessible, as well as promoting health and well-being. For further details on how environmental impacts in relation to health have been assessed, mitigated, and managed, refer to the relevant chapters of the **ES [EN010154/APP6.1],** which includes: a. **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]**;

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		b. **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]**; c. **Chapter 11: Noise and Vibration** of the ES **[EN010154/APP/6.1]**; d. **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]**; and e. **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]**, Section 14.2: Air Quality. Section 6.2 of the **Planning Statement [EN010154/APP/7.2]** confirms that suitable mitigation measures have been incorporated into the design where adverse effects are anticipated in relation to health. Measures in relation to health and wellbeing are set out across the **Framework PRoW Management Plan [EN010154/APP/7.14]**, **Framework CEMP [EN010154/APP/7.7]**, **Framework CTMP [EN010154/APP/7.18]**, **Framework DEMP [EN010154/APP/7.9], and Framework LEMP [EN010154/APP/7.15]** and include, but are not limited to, mitigations such as temporary traffic management; the creation of new PRoW; the adoption of Best Practice Measures; and planting. Detailed versions of these plans will be produced and secured via requirements 18,12,14,20, and 8 as detailed in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. Additionally, consideration to the safety of BESS has been given, and includes the implementation of a **Framework**

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		Battery Safety Management Plan (BSMP) [EN010154/APP/7.17], of which a detailed plan will be produced substantially in accordance with the framework plan and secured via Requirement 7 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Section 12: Achieving Well Designed Places	Paragraph 136 acknowledges that "*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-lined52, 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."*	**Appendix 10-H Arboricultural Impact Assessment** of the ES **[EN010154/APP/6.3]** details the assessment on arboriculture that has been undertaken, which demonstrates the consideration of trees, and confirms no trees subject to Tree Preservation Orders or within a Conservation Area are to be removed. **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** further confirms that veteran and ancient trees within the Order Limits will be retained and protected with suitable buffers, presented in the **Works Plans [EN010154/APP/2.2]**. Buffers and offsets are included in the Design Commitments at **Appendix A: Design Commitments** of the **Design Approach Document [EN010154/APP/7.3]** and secured by Requirement 6 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1].** Consideration to trees from an early design phase has been given, with the Order Limits having been refined to

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		excluded sensitive areas of ancient woodland as part of the iterative design process, as detailed within **Design Approach Document [EN010154/APP/7.3]**. A **Framework LEMP [EN010154/APP/7.15]** has been produced for this application which sets out the management of existing trees and woodland, and new trees, including the community orchard. Section 4.3 of the **Framework LEMP [EN010154/APP/7.15]** sets out the Arboricultural Strategy for the Proposed Development, which includes the provision of new trees and details how minimising adverse effects to existing trees has been considered. The establishment and maintenance of new trees is set out in an Arboricultural Method Statement which will be secured by the **Framework CEMP [EN010154/APP/7.7]**. A detailed version of this plan is secured via Requirement 12 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. A detailed version of the **Framework LEMP [EN010154/APP/7.15]** will be prepared as secured by Requirement 8 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Section 12: Achieving Well Designed Places	Paragraph 137 states that "*Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local*	Section 2 of the **Design Approach Document [EN010154/APP/7.3]** sets out the consideration of both national and local policy in the design of the Proposed Development. Section 6 of the **Design Approach**

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	community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should, where applicable, provide sufficient information to demonstrate how their proposals will meet the design expectations set out in local and national policy, and 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."	**Document [EN010154/APP/7.3]** sets out how good design has been secured, including details of the ongoing engagement with the community through the establishment of a Community Liaison Group (CLG). Further details of how the design has considered policy is set out in Section 4.2 of **Chapter 4: Alternatives and Design Evolution of the ES [EN010154/APP/6.1]**. Consultation with the local authority and relevant stakeholders is set out within the **Consultation Report [EN010154/APP/5.1],** which sets out how the Applicant has engaged with the required stakeholders. The Applicant demonstrates consideration of the outcomes from Statutory Consultation as set out through the design changes listed in Section 11.3 of the **Consultation Report [EN010154/APP/5.1].** Evidence of continued consultation and engagement with the local community and relevant representatives is documented in Section 12.3 of the **Consultation Report [EN010154/APP/5.1].** This includes setting out the establishment of the Community Liaison Group (CLG), following discussions with host authorities during the statutory consultation. As a result, one meeting of the CLG has already taken place, and further planned meetings will take place during the consenting process, should be consent be granted and into construction. The first CLG meeting was held on 28 April 2025. The Applicant

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		has demonstrated early and continued engagement with the local community and LPA, with the outcomes of consultation having been reflected through the evolution of the design of the Proposed Development.
Section 14: Meeting the Challenge of Climate Change, Flooding and Coastal Change	Paragraph 161 states that "*The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks 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.*" Paragraph 163 states that "*The need to mitigate and adapt to climate change should also be considered in preparing and assessing planning applications, taking into account the full range of potential climate change impacts.*" Paragraph 164 states that "*New development should be planned for in ways that:* *a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care*	The **Statement of Need [EN010154/APP/7.1]** and Section 5 of the **Planning Statement [EN010154/APP/7.2]** demonstrate the Proposed Development's significant contribution to the urgent need for low carbon electricity generation and its role in helping provide the energy required for the UK. **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** presents the findings of an assessment of the likely significant effects on climate change as a result of the Proposed Development. A number of embedded mitigation measures have been implemented within the design of the Proposed Development in relation to climate change, which include nature-based solutions where possible, as detailed in Section 6.4 of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]**. **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** presents an assessment of climate change through a Lifecycle Greenhouse Gas (GHG) Impact Assessment; Climate Change Risk (CCR)

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	should be taken to ensure that risks can be managed through suitable adaptation measures, including through incorporating green infrastructure and sustainable drainage systems; and *b) help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings in plans should reflect the Government's policy for national technical standards*".	Assessment, and In-combination Climate Change Impact (ICCI) Assessment. The CCR assesses the resilience of the Proposed Development to the impacts of future climate change, whilst the ICCI assesses the resilience of receptors in the surrounding environment to the combined impact of future climate conditions and the Proposed Development. Through embedded and additional mitigation measures any significant effects in relation to climate change have been minimised and reduced as far as possible. There are three significant adverse effects in relation to the CCR as the risk of the climatic event cannot be controlled, however mitigation measures have reduced the consequence rating to either minor or moderate. Section 4.5 of the **Design Approach Document [EN010154/APP/7.3]** details how climate change has been considered within the design. This includes measures in relation to the control of flood risk, surface water drainage, and management of extreme weather conditions. Measures to protect against the adverse effects of climate change on the natural environment are set out in the **Framework LEMP [EN010154/APP/7.15]** and include consideration of future climate conditions when selecting species for use in green infrastructure; and protecting

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		against increased soil erosion and degradation due to increased precipitation. The **Framework CEMP [EN010154/APP/7.7]** contains measures which include but are not limited to: preventing increases in flood risk; minimising the creation of waste; and monitoring annual temperatures. With regards to GHG emissions, **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** concludes the Proposed Development is considered to be aligned with the UK's overall trajectory to net zero. It explains that while some GHG impacts arise from construction and decommissioning, these are determined to have a non-significant effect on the climate and that the Proposed Development aligns with and contributes to the relevant transition scenario keeping the UK on track towards Net Zero. Additionally, it is shown that the Proposed Development results in a significant beneficial effect during operation, with a reduction in atmospheric GHG emissions. As set out in **Table 6-13:** Assessment of effects – GHG assessment of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1],** this results in a residual (beneficial) significant effect for GHG emissions, thus offsetting the non-significant minor adverse GHG impact anticipated from construction and decommissioning.

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	Paragraph 168 states that "*When determining planning applications for all forms of renewable and low carbon energy developments and their associated infrastructure, local planning authorities should:* *a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future;* *b) recognise that small-scale and community-led projects provide a valuable contribution to cutting greenhouse gas emissions;* *c) in the case of applications for the repowering and life-extension of existing renewable sites, give significant weight to the benefits of utilising an established site.*"	The **Statement of Need [EN010154/APP/7.1]** sets out the need for the Proposed Development in the context of Government policy on net zero. Section 7 of the **Planning Statement [EN010154/APP/7.2]** demonstrates the Proposed Development seeks to avoid and mitigate impacts on the environment and sensitive receptors where possible, with the benefits outweighing any impact. There are no sensitive designations to prevent the Proposed Development from helping to deliver the CNP infrastructure to contribute to the UK's urgent requirement for the delivery of new renewable energy generation capacity and infrastructure.
	Paragraph 170 states that "*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*." Paragraph 173 states that "*A sequential risk-based approach should also be taken to individual applications*	A site-specific flood risk assessment is provided in **Appendix 9-C: Flood Risk Assessment (FRA)** of the ES **[EN010154/APP/6.3]**. The assessment considers flood risk across all stages of development. The FRA considers the potential sources of flooding and assesses the risk of flooding to the Proposed Development. The FRA concludes that flood risk from all sources will not increase as a result of the Proposed Development, within the DCO

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	in areas known to be at risk now or in future from any form of flooding, by following the steps set out below." Paragraph 174 states that "*Within this context the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test.*" Paragraph 175 states that "*The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk)*." Paragraph 177 states that "*Having applied the sequential test, 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*	Site or elsewhere, with the proposed embedded mitigation measures in place. **Appendix 9-C: FRA** of the ES **[EN010154/APP/6.3]** demonstrates the Principal Site passes both the Sequential and Exception Test. The Site Selection Report at **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2],** and **Statement of Need [EN010154/APP/7.1]** further detail the consideration of flood risk and need for the Proposed Development on the land selected. **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]** sets out the approach to assessing the suitability of the site for the Proposed Development and potential alternative sites against a range of planning, environmental and operational criteria for generating stations with capacity of more than 50MW. The site selection process for the consideration of potential alternative sites was undertaken in five stages. Following identification of an area of search (Stage 1), all planning and environmental constraints including areas at risk of flooding (Flood Zones 2 and 3) were excluded in order to seek to identify a site with no constraints (Stage 2). Following identification of potential sites with all constraints excluded (Stage 3) and their evaluation (Stage 4), it was concluded that the search needed to be widened

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	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." Paragraph 178 states that "*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* *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 179 states that "*Both elements of the exception test should be satisfied for development to be allocated or permitted*." Paragraph 181 states that "*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*	as it was not possible to identify an appropriate site within the parameters defined for Stages 1 to 4 (Stage 5). Alongside other criteria, land within Flood Zones 2 and 3 was reintroduced back into the area of search. With constraints reintroduced, **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]** concludes that the location of the Proposed Development comprises the preferred site when compared with other potential alternative sites when taking into account planning and environmental constraints and operational considerations. Given the efforts made to identify a suitable site in initial consideration of areas at low risk of flooding and then higher risk areas, it has been demonstrated that the sequential test has been applied and satisfied as part of site selection The Applicant has also applied the Exception Test as the sequential test has demonstrated that, at a site-specific level, there are no reasonably available lower risk sites to locate the required solar PV development that would deliver the same amount of renewable energy. Regarding wider sustainability benefits, the Proposed Development delivers substantial benefits as set out in Section 5.3 of the **Planning Statement [EN010154/APP/7.2]** and considered further in the planning balance in Section 7, that would outweigh the flood risk. In relation to whether the development would be safe for its lifetime, **Appendix 9-C: FRA** of the ES **[EN010154/APP/6.3]** concludes flood

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	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"*	risk, from all sources, will not increase as a result of the Proposed Development, within the DCO Site or elsewhere, with the proposed embedded mitigation in place. **Appendix 9-D: Framework Surface Water Drainage Strategy** of the ES **[EN010154/APP/6.3]** demonstrates surface water drainage will be manged effectively to ensure there is no increase in surface water runoff from the Proposed Development above the existing regime. Thus, the Proposed Development satisfies the Exception Test. As stated above, **Appendix 9-C: FRA** of the ES **[EN010154/APP/6.3]** and Section 9.8 of **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]** demonstrates flood risk, from all sources, will not increase as a result of the Proposed Development, within the DCO Site or elsewhere, and that there are no significant residual effects anticipated, with the implementation of proposed mitigation measures, as set out within Section 9.6 of **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]**. These measures include, but are not limited to, a number of design and siting choices such as minimum height above ground for the Solar PV panels; a surface water drainage strategy to minimise flood risk as set out in **Appendix 9-D: Framework Surface Water Drainage Strategy** of the ES **[EN010154/APP/6.3]**; and measures to manage any temporary effects from construction and decommissioning through the

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		Framework CEMP [EN010154/APP/7.7] and **Framework DEMP [EN010154/APP/7.9].** Additionally, the **Framework CEMP [EN010154/APP/7.7]** contains details of an Emergency Response Plan in Section 3.5, that will be produced as part of the detailed CEMP. The measures in both the **Framework CEMP [EN010154/APP/7.7]** and **Framework DEMP [EN010154/APP/7.9]** include additional good practice guidance from the Construction Industry Research and Information Association (CIRCA) and British Standards (BS) documents, and detailed versions of both plans are to be secured in accordance with the framework plans via requirements 12 and 20 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]** assesses all impacts on the water environment. Section 9.6 lists mitigation measures taken following the assessment of impacts on the water environment. Following the implementation of standard and embedded mitigations, there are no likely significant effects resulting from any stage of development as a result of the Proposed Development. Climate change resilience is accounted for in **Appendix 9-D: Framework Surface Water Drainage Strategy** of the ES **[EN010154/APP/6.3]** which sets out measures to manage surface water generated within the Principal Site

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		during operation through the design of drainage. These measures are set out in Section 4 of the strategy and include, but are not limited to, attenuation features; discharge routes; SuDS; fire water runoff, and foul water. A detailed version of **Appendix 9-D: Framework Surface Water Drainage Strategy** of the ES **[EN010154/APP/6.3]** is secured via Requirement 10 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
	Paragraph 182 states that *"Applications which could affect drainage on or around the site should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, and which are proportionate to the nature and scale of the proposal. These should provide multifunctional benefits wherever possible, through facilitating improvements in water quality and biodiversity, as well as benefits for amenity. Sustainable drainage systems provided as part of proposals for major development should:* *a) take account of advice from the Lead Local Flood Authority;* *b) have appropriate proposed minimum operational standards; and*	Specific details on the consideration of surface water drainage are provided in **Appendix 9-D: Framework Surface Water Drainage Strategy** of the Environmental Statement **[EN010154/APP/6.3]**. A summary of the proposed surface water drainage strategy is provided below: a. The proposed solar PV panels will be mounted a minimum of 800mm above ground level to prevent sealing the ground with an impermeable surface beneath the solar panels, allowing rainfall/runoff to infiltrate to ground throughout the Principal Site; b. The areas between, under and surrounding the solar PV panels will be planted with suitable planting such as native grassland and wildflower mix in order to absorb rainfall running off the panels, preventing it from

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	c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development"	concentrating and potentially forming channels in the ground; c. New access roads will be permeable; d. A swale will be constructed around the Solar Station Compounds, the centralised BESS area and Onsite Substation. The swales will collect and treat surface water before discharge; and e. Edge swales are proposed to capture excess runoff from the PV fields to reduce existing surface water risk running off the fields. This includes edge swales implemented as part of a voluntary enhancement, which the Applicant has chosen to provide to fields 25,30, and 34 to reduce the volume of overland flow received by the properties adjacent to these fields. This commitment is set out in Section 4.7 of **Appendix 9-D: Framework Surface Water Drainage Strategy** of the ES **[EN010154/APP/6.3]**, which is secured via Requirement 10 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. Where possible, surface water will drain from the Proposed Development's swale-based drainage system to local receiving watercourses via a new open green ditch.

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		SuDS features will not be on publicly accessible land. Consequently, the potential amenity benefit provided by the proposed drainage is not considered relevant to the design. The proposed Surface Water Drainage Strategy will be maintained by the Applicant, or another private operator to be confirmed, and secured through the DCO. All proposed drainage features should be maintained according to standard practice. A detailed surface and foul water drainage strategy is also to be secured by Requirement 10 which will require approval from the relevant planning authorities and lead local flood authorities in North Kesteven District Council (NKDC) and Lincolnshire County Council (LCC), as outlined in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Section 15: Conserving and Enhancing the Natural Environment	Paragraph 187 states that "*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);*	**Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** presents the findings of the assessment of the likely significant effects of the Proposed Development on the landscape character and visual amenity, the conclusions of which are explained below. Section 10.6 of **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** details how landscape and visual impacts have been considered

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	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;* *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 and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;* *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."*	within the iterative design process and outlines the landscape strategy and embedded mitigations. As described in Section 10.6 of **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]**, this includes careful siting in the landscape, conserving existing vegetation patterns, creating new green infrastructure, sensitive design in relation to form and materials and sensitive design of lighting. The **Design Approach Document [EN010154/APP/7.3]** further details how the Applicant considers landscape and visual matters as part of the Proposed Development's design including through Design Principles 1, 4 and 8. These set out that the Proposed Development will be designed to minimise adverse landscape and visual effects as far as possible through its sensitive integration into the landscape; use of buffers and offsets to manage potential impacts on protected specifies and habitat features; alignment with existing landscape features, field boundaries; and its retention of existing vegetation, and siting to minimise watercourse crossings where practicable. **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** confirms there are no national landscape designations that are impacted by the Proposed Development.

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	Paragraph 189 states that "*Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues*."	Careful siting and offsets have been used to reduce impacts. Further to this, a **Framework LEMP [EN010154/APP/7.15]** is secured under Requirement 8 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]** which includes provision for the successful establishment and future management of biodiversity, habitat creation, and landscaping works. Even with this mitigation in place, as concluded in **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]**, it is evident that there will be an adverse impact on the surrounding landscape and visual impact caused by the Proposed Development during the operational phase and there will be long-term moderate to major adverse effects on landscape character and visual amenity. In most instances, these impacts can be adequately mitigated but, in some instances, there will be residual adverse impacts resulting in harm which needs to be weighed in the planning balance. This harm is tempered by other instances where current landscape and visual impacts are improved such as hedgerow gapping up, strengthening field boundaries, and biodiversity improvements. It is demonstrated through the Proposed Development that all reasonable steps have been taken to avoid, reduce,

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		and where necessary, mitigate these impacts. The majority of these effects are of a long term, reversible nature. The Proposed Development is committed to delivering ecological enhancements and net gain. As detailed within the **Biodiversity Net Gain Report [EN010154/APP/7.12]**, based on the illustrative design, the Proposed Development will achieve a net gain of 30% for area-based habitat units; 50% for hedgerow units; and 10% for watercourses. This will be managed through the **Framework LEMP [EN010154/APP/7.15]**, of which a detailed version is secured via Requirement 8 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1],** which also provides the Applicant's commitment to secure the BNG % referred to above. The design of the Proposed Development seeks to protect species and habitat features through the use of buffers and offsets, as well as through the provision of undeveloped areas of at least 15m between woodlands. Appropriate buffers, based on tree root protection areas, between ancient/veteran trees are further included. These measures are set out in the **Framework CEMP [EN010154/APP/7.7]**, of which a detailed version in accordance with the framework plan, will be secured via Requirement 12 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.

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		Chapter 8: Ecology and Nature Conservation of the ES **[EN010154/APP/6.1]** presents the findings of an assessment of the potential significant effects of the construction, operational, and decommissioning phases of the Proposed Development on biodiversity. The chapter concludes that the Proposed Development will not result in any significant adverse effects to biodiversity and any measures to protect species are embedded in the **Framework LEMP [EN010154/APP/7.15]** and the **Framework CEMP [EN010154/APP/7.7]** to be secured by requirements 8 and 12 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. With regard to sub section e, as set out within the Design Principles contained within Section 3.8 of the **Design Approach Document [EN010154/APP/7.3]**, the Proposed Development has sought to improve local environmental conditions where possible. As detailed within the relevant chapters of the **ES [EN010154/APP/6.1]**, there are not expected to be any significant adverse effects in relation to air quality, noise, water, or soil, pollution following the implementation of mitigation measures where required. Further details are provided in the Section 14.2 (Air Quality)**,** and Section 14.4 (Ground Conditions) of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]**, **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]**, and **Chapter 11: Noise and**

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		Vibration of the **ES [EN010154/APP/6.1]**. Measures are also provided to mitigate any potential effects, as set out within the **Framework CEMP [EN010154/APP/7.7], Framework OEMP [EN010154/APP/7.8]**, and **Framework DEMP [EN010154/APP/7.9],** as secured by requirements 12, 13, and 20 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. Additionally, a **Soil Management Plan [EN010154/APP/7.10]** supports the management of soil, through measures to help reduce impacts on soil. A detailed plan, substantially in accordance with this framework plan will be secured via Requirement 15 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. Regarding sub section f, as set out in the Section 14.4 (Ground Conditions) of **Chapter 14: Other Environmental Topics** of the **ES [EN010154/APP/6.1]**, there are no anticipated significant adverse effects in relation to ground conditions following the implementation of embedded and additional mitigation measures. These measures are set out within **Appendix 14-C: Phase 1 Preliminary Risk Assessment** of the ES **[EN010154/APP/6.3]** and will be managed through the **Framework CEMP [EN010154/APP/7.7]** and **Framework OEMP [EN010154/APP/7.8]** from which detailed plans will be produced and secured via requirements 12 and 13 of

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		Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. As confirmed within **Chapter 10: Landscape and Visual Amenity** of the **ES [EN010154/APP/6.1]**, the Proposed Development is not located within a National Park, the Broads, or National Landscape, and hence no further consideration is needed. Although as set out in Section 3.8 in Design Principle 1 of the **Design Approach Document [EN010154/APP/7.3]**, the design of the Proposed Development has sought to minimise adverse landscape and visual impacts as far as possible.
	Footnote 65 states 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*."	The Applicant has sought to avoid the use of agricultural BMV land where possible, starting from the site selection process, as set out within Section 3.3 of **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]**. Although the selected site contained BMV land, as detailed within section 4 of **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2],** this was minimised as far as practicable. As set out in Design Principle 2, shown at Section 3.8 of the **Design Approach Document [EN010154/APP/7.3]**, the Proposed Development has been designed to be sensitive to, and minimise development on, BMV land. Embedded mitigation measures are included in the

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		design, such as the siting of the above ground infrastructure to avoid BMV land as far as practicable, as set out within Section 12.6 of **Chapter 12: Socio-Economics and Land Use** of the **ES [EN010154/APP/6.1]**. This chapter also confirms, following the implementation of these embedded mitigation measures, no significant adverse effects are anticipated on land use.
	Paragraph 193 states that "*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;*	The design of the Proposed Development seeks to protect species and habitat features, through the use of buffers and offsets, as well as through the provision of undeveloped areas of at least 15m between woodlands. The design also includes appropriate buffers between ancient/veteran or ancient trees (based on tree root protection areas), thereby avoiding any direct impact. Buffers and offsets are included in the Design Commitments at **Appendix A: Design Commitments** of the **Design Approach Document [EN010154/APP/7.3]** and secured by Requirement 6 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. As confirmed within **Chapter 8: Ecology and Nature Conservation** of the **ES [EN010154/APP/6.1]** and the **Habitats Regulations Assessment (HRA) Report [EN010154/APP/7.13]**, the Proposed Development is not located within a SSSI and there are no residual significant adverse effects on the assessed Important Ecological

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	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 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.*" Paragraph 195 states that "*the presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site*".	Features (IEF's), including SSSI's, anticipated at any stage during the life-time of the Proposed Development. **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** presents the findings of an assessment of the potential significant effects of the construction, operational, and decommissioning phases of the Proposed Development on biodiversity. The chapter concludes that the Proposed Development will not result in any significant adverse effects to biodiversity and any measures to protect species are embedded in the **Framework LEMP [EN010154/APP/7.15]** and the **Framework CEMP [EN010154/APP/7.7]** to be secured by requirements 8 and 12 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. The measurable net gains for biodiversity are detailed within the **BNG Report [EN010154/APP/7.12]** which confirms, based on the illustrative design, the Proposed Development will achieve a net gain of 30% of area-based habitat units; 50% for hedgerow units; and 10% for watercourses. This will be managed through the **Framework LEMP [EN010154/APP/7.15]** as secured by Requirement 8 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. The **Habitats Regulation Assessment No Significant Effects Report [EN010154/APP/7.13]** included with the

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		DCO submission has been undertaken to inform the ES. The HRA concludes there will be no significant effects to European Sites either from the construction, operation and decommissioning of the Proposed Development or in combination with other plans and projects. Therefore, information regarding a derogation under the Habitats Regulations is not required. There is no ancient woodland within the Order Limits although Tunman Wood, to the east of Morton, is located adjacent to the boundary. **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** sets out that veteran and ancient trees were recorded within the Order Limits and will be retained and protected with suitable buffers as presented in the **Works Plans [EN010154/APP/2.2]**.
	Paragraph 196 states that "*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);*	Section 14.4 of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** assesses the impact of the Proposed Development on ground conditions. A Preliminary Risk Assessment (PRA) has been undertaken to assess the land condition and identify potential environmental land quality liabilities and constraints prior to the construction of the Proposed Development. Following the implementation of embedded and additional mitigation measures, as set out in Sections 11, 12, 14, and

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	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*." Paragraph 197 states *"Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner."*	15 of **Appendix 14-C: Phase 1 Preliminary Risk Assessment** of the ES **[EN010154/APP/6.3]** and summarised in the **Framework CEMP [EN010154/APP/7.7]**, Section 14.4 Ground Conditions of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** no likely significant effects are anticipated in relation to ground conditions. In summary, impacts of the Proposed Development on ground conditions can be appropriately controlled to acceptable standards and further investigation will be undertaken if required to understand potential areas of contamination. Whilst Horizontal Directional Drilling is required for the Proposed Development, the **Framework CEMP [EN010154/APP/7.7]** sets out in Section 3.7, how construction vibrations will be managed through best practice measures, which will be implemented subject to a detailed CEMP secured under Regulation 12 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
	Paragraph 198 states that "*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*	**Chapter 11: Noise and Vibration** of the ES **[EN010154/APP/6.1]** provides an assessment of the noise and vibration impacts from construction, operation and maintenance, and decommissioning. Section 11.9 of the chapter confirms, following the implementation of mitigation measures, to be secured through requirements 6 (detailed design), 12 (CEMP), 13 (OEMP), 14 (CTMP),

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	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*."	16 (operational noise), and 20 (DEMP) of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**; there are no residual significant effects anticipated in relation to noise and vibration from the Proposed Development at any stage of development, with the exception of precautionary likely significant construction vibration effects identified at residential receptors R26, R35, R50 during pilling for solar structures. The effect is precautionary as calculations are based on percussive piling rigs from BS 5228-2 as vibration data for mini-piling rigs used for solar PV structures is not available. As such, construction vibration effects are likely to be overestimated. Section 10.6 of **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** details the embedded mitigation measures incorporated into the Proposed Development, which include careful lighting design. This includes: a. No areas of the Proposed Development will be continuously lit. b. Operational lighting will be triggered by Passive Infra-red Detector (PID) systems, which will be installed around the perimeter of the Proposed Development.

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		c. Lighting will be directional with care to minimise potential for light spillage beyond the Site particularly towards neighbouring properties, habitats, highways or waterways. d. Lights installed will be of the minimum brightness and/or power rating capable of performing the desired function. e. Light fittings will be used to reduce the amount of light emitted above the horizontal (reduce upward lighting). f. The lighting of the primary substation will be motion sensor triggered, that would operate from dusk. g. Low level lighting on specific operational units will be triggered by motion sensors, from dusk. h. The inward facing CCTV cameras will typically use infra-red night-vision technology and will not require additional lighting or areas to be continuously lit.
Section 16: Conserving and Enhancing the	Paragraph 207 states that *"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'*	A description of the significance of the relevant heritage assets is set out in **Table 7-9:** Summary of sensitive heritage receptors and their value of **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]** and accompanying appendices including **Appendix 7-B:**

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Historic Environment	*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.*" Paragraph 212 states that "*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*." Paragraph 213 states that "*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;*	**Cultural Heritage Desk Based Assessment** and **Appendix 7-H: Written Scheme of Investigation for an Archaeological Evaluation [EN010154/APP/6.3]**. As set out in Section 7.4 of **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]**, the principles of the impact methodology rest upon independently evaluating the value of the cultural heritage resources and the magnitude of impact upon that value. The cultural heritage assessment includes an assessment of the heritage value of potentially affected assets, in line with NPS EN-1. This requires the provision of information sufficient to enable adequate understanding of the potential impacts on the value (heritage significance) of any heritage asset, which is consistent with the requirements of the NPPF and is proportionate to the importance of the asset. The assessment takes account of changes to both the physical asset and its setting. Using professional judgement and the results of consultations, the assessment of the values has been informed by guidance and takes account of paragraph 213 of the NPPF which defines heritage assets of the 'highest significance', namely: World Heritage Sites, Scheduled Monuments, Protected Wreck Sites, Registered Battlefields, Grade I and II* Listed Buildings, and Grade I and II* Registered Parks and Gardens. Heritage assets have been assessed on an individual basis and regional

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	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*". Paragraph 214 states that "*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 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.*" Paragraph 215 states that "*Where a development proposal will lead to less than substantial harm to the*	variations and individual qualities taken into account where applicable **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]** presents the assessment findings of the likely significant effects on cultural heritage as a result of the Proposed Development. In terms of impacts to archaeology and designated heritage assets, historic buildings and historic landscape elements, the assessment of the Proposed Development has concluded that there would be no adverse effects. Notwithstanding, the Proposed Development will lead to less than substantial harm (at the lower end of the scale) to the significance of two designated heritage assets and one non-designated asset. However, it has been demonstrated that the substantial benefits of the Proposed Development outweigh the harm to these assets. As set out in Section 7.6 of **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1],** there are a number of embedded mitigation measures, such as the siting of the Proposed Development, to manage impacts to the setting of historic assets**.** This includes measures to manage impacts on designated heritage assets during construction and decommissioning, despite any impacts to them during these phases being non-significant and temporary. These measures are set out within the **Framework CEMP [EN010154/APP/7.7]**, **Framework**

Policy Reference	Policy description	Compliance commentary
	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." Paragraph 216 states that "*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*".	**CTMP)[EN010154/APP/7.18]** and **Framework DEMP [EN010154/APP/7.9],** as secured by requirements 12, 14 and 20 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. For further detail please see Section 6 of this **Planning Statement [EN010154/APP/7.2]** and **Appendix 7-D: Detailed Heritage Asset Setting Assessment** of the ES **[EN010154/APP/6.3].**
Section 17: Facilitating the Sustainable Use of Minerals	Paragraph 227 states that "*Minerals planning authorities should plan for a steady and adequate supply of industrial minerals by:* *…b) encouraging safeguarding or stockpiling so that important minerals remain available for use*".	**Appendix 12-C Minerals Safeguarding Assessment** of the ES **[EN010154/APP/6.3]** concludes that no permanent sterilisation of mineral resources will occur due to the Proposed Development and the ability of future generations to extract the resource over the long term will not be compromised.

Appendix C Local Policy Accordance Tables

Lincolnshire Minerals and Waste Local Plan, Core Strategy and Development Management Policies (adopted June 2016)

Policy reference	Policy description	Compliance commentary
Policy DM1: Presumption in favour of sustainable development	When considering development proposals, the County Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area. Planning applications that accord with the policies in this Local Plan will be approved without delay, unless material considerations indicate otherwise. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the County Council will grant permission unless material considerations indicate otherwise - taking into account whether:	The presumption in favour of sustainable development is noted. In the **Planning Statement [EN010154/APP/7.2]** is concluded that there are no adverse impacts of sufficient weight, either on their own or collectively, that would mean that the DCO should not be made. The harm identified to designated and non-designated heritage assets, landscape character and visual amenity, from the temporary loss of agricultural land is clearly outweighed by the substantial public benefits that would arise from the provision of low carbon energy. As a result, the Proposed Development is in accordance with national energy policy, national planning policy and the relevant development plan documents, including the Lincolnshire Minerals and Waste Local Plan, Core Strategy and Development Management Policies (adopted June 2016), when considered as a whole.

Policy reference	Policy description	Compliance commentary
	• Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or • Specific policies in that Framework indicate that development should be restricted.	
Policy M11: Safeguarding of Mineral Resources	Sand and gravel, blown sand and limestone resources that are considered to be of current or future economic importance within the Minerals Safeguarding Areas shown on Figure 1, together with potential sources of dimension stone for use in building and restoration projects connected to Lincoln Cathedral/Lincoln Castle within the areas shown on Figure 2, and chalk resources included on Figure 3, will be protected from permanent sterilisation by other development. Applications for non-minerals development in a minerals safeguarding area must be accompanied by a Minerals Assessment. Planning permission will be granted for development within a Minerals Safeguarding Area provided that it would not sterilise	The Proposed Development is partially located within a Mineral Safeguarding Area for sand and gravel and limestone and lies in proximity to sand and gravel minerals sites at Whisby Quarry, Swinderby Airfield and Norton Bottoms Quarry. For this reason, a Minerals Safeguarding Assessment is provided in **Appendix 12-C: Minerals Safeguarding Assessment** of the ES **[EN010154/APP/6.3].** The Proposed Development is a long-term, reversible development, in operation for a period of 60 years before it is decommissioned and the land restored to its original use. Given the reversible nature of the Proposed Development, there will be no permanent sterilisation of the mineral resource, and the ability of future generations to extract the resource over the long term will not be

Policy reference	Policy description	Compliance commentary
	mineral resources within the Mineral Safeguarding Areas or prevent future minerals extraction on neighbouring land. Where this is not the case, planning permission will be granted when: a. the applicant can demonstrate to the Mineral Planning Authority that prior extraction of the mineral would be impracticable, and that the development could not reasonably be sited elsewhere; or b. the incompatible development is of a temporary nature and can be completed and the site restored to a condition that does not inhibit extraction within the timescale that the mineral is likely to be needed; or c. there is an overriding need for the development to meet local economic needs, and the development could not reasonably be sited elsewhere; or d. the development is of a minor nature which would have a negligible impact with respect to sterilising the mineral resource; or	compromised. This is further supported by the Lincolnshire Local Aggregate Assessment which demonstrates that with a combination of current and allocated sites and planning applications to be determined, there should be sufficient sand and gravel and limestone resources to last beyond the Lincolnshire Minerals and Waste Local Plan period. The Proposed Development will temporarily sterilise mineral resources for the period that it is in operation. As such the criteria in Policy M11 are addressed below: a. If prior extraction of the mineral were to be undertaken, this could delay the start of construction of the Proposed Development, depending on the amount of mineral that is required to be extracted. The urgent need for and the status of the Proposed Development as critical national priority is established in NPS EN-1. A site selection process has been undertaken and reported in **Appendix A: Site Selection Report** of the

Policy reference	Policy description	Compliance commentary
	e. the development is, or forms part of, an allocation in the Development Plan. **Exemptions** This policy does not apply to the following: a. Applications for householder development b. Applications for alterations to existing buildings and for change of use of existing development, unless intensifying activity on site c. Applications for Advertisement Consent d. Applications for Listed Building Consent e. Applications for reserved matters including subsequent applications after outline consent has been granted f. Prior Notifications (telecommunications; forestry; agriculture; demolition)	**Planning Statement [EN010154/APP/7.2]**, which takes into account a range of environmental, planning and access factors, including liaison with landowners. It is therefore considered that the Proposed Development could not be reasonably sited elsewhere. Furthermore, review of geological maps and borehole information indicate that the presence of economically viable deposits of Sand and Gravel within the DCO Site are negligible to limited. Therefore, the available information indicates that it is unlikely that an economic proposal to extract mineral from within the DCO Site would be expected. For further details please see Section 5.4 of **Appendix 12-C: Minerals Safeguarding Assessment** of the ES **[EN010154/APP/6.3].** b. The Proposed Development is long term but reversible in nature and land would be restored to a condition that does not inhibit extraction of the mineral resource.

Policy reference	Policy description	Compliance commentary
	g. Certificates of Lawfulness of Existing or Proposed Use or Development (CLEUDS and CLOPUDs) h. Applications for Tree Works	c. The urgent need for low carbon generation is established in NPS EN-1 which identifies solar as a critical national priority. The point about siting the Proposed Development elsewhere is addressed in paragraph a. above. d. Whilst the Proposed Development is not minor in nature, being a Nationally Significant Infrastructure Project, it has a negligible impact on the mineral resource as it would be operational for a temporary period and the land will be returned to its original use after 60 years. e. The Proposed Development does not form part of the Development Plan. None of the exemptions set out in Policy M11 apply.
Policy M12: Safeguarding of Existing Mineral Sites and Associated Minerals Infrastructure	Mineral sites (excluding dormant sites) and associated infrastructure that supports the supply of minerals in the County will be safeguarded against development that would unnecessarily sterilise the sites and infrastructure or prejudice or jeopardise their use by creating incompatible land uses	There are three existing minerals sites, Whisby Quarry, Swinderby Airfield, and Norton Bottoms Quarry, located outside of the DCO Site and shown in **Figure 1: Existing Minerals Sites and Site Allocations** of **Appendix 12-C: Minerals**

Policy reference	Policy description	Compliance commentary
	nearby. Exemptions This policy does not apply to the following: a. Applications for householder development b. Applications for alterations to existing buildings and for change of use of existing development, unless Intensifying activity on site c. Applications for Advertisement Consent d. Applications for Listed Building Consent e. Applications for reserved matters including subsequent applications after outline consent has been granted f. Prior Notifications (telecommunications; forestry; agriculture; demolition) g. Certificates of Lawfulness of Existing or Proposed Use or Development (CLEUDs and CLOPUDs) h. Applications for Tree Works	**Safeguarding Assessment** of the ES **[EN010154/APP/6.3].** Given the Proposed Development does not encroach into these sites and is located more than 300m from Whisby Quarry and Swinderby Airfield and 1,700m from Norton Bottoms Quarry, it would not unnecessarily sterilise them or prejudice or jeopardise their use by creating incompatible land uses, such as housing, nearby. Furthermore, the Proposed Development would not impact the ability of the sites to operate or extend in the future, as anticipated by the Lincolnshire Minerals and Waste Local Plan. A further former minerals site, Harmston limestone quarry, is recorded as inactive and the site is not expected to recommence limestone extraction.

Policy reference	Policy description	Compliance commentary

Lincolnshire Minerals and Waste Local Plan Site Locations (December 2017)

Policy SL1: Mineral Site Allocations	A steady and adequate supply of sand and gravel for aggregate purposes, in accordance with Policy M2 of the Core Strategy and Development Management Policies document, will be provided through: • the continued provision of sand and gravel from the remaining permitted reserves at the following sites: o Baston No 1 Quarry; o Baston No 2 Quarry; o Baston Manor Pit Quarry; o Kettleby Quarry; o King Street Quarry; o Kirkby on Bain Quarry; o North Kelsey Road Quarry; o Norton Bottoms Quarry; o Norton Disney Quarry; o Red Barn Pit Quarry; o Swinderby Airfield Quarry; o Tattershall (Park Farm) Quarry; o West Deeping Quarry; and o Whisby Quarry • the provision of sand and gravel from extensions to the following sites which have a resolution to grant planning permission subject to a s.106 Planning Obligation: o Whisby Quarry; and	As demonstrated in response to Policy M12 above and set out in **Appendix 12-C: Minerals Safeguarding Assessment** of the ES **[EN010154/APP/6.3]**, the Proposed Development will not impact the ability of the sites at Whisby Quarry, Norton Bottoms Quarry and Swinderby Airfield to operate or extend in the future as anticipated by the Lincolnshire Minerals and Waste Local Plan.

	o Kirkby on Bain Quarry and • the granting of planning permission for sand and gravel working from the following allocated sites where the applicant can demonstrate that the proposal is in accordance with the development plan… The allocated sites shall be developed in accordance with the Development Briefs in Appendix 1 of this plan.	
Policy SL2: Safeguarding Mineral Allocations	Allocated sites, as set out in Policy SL1, including an area of 250 metres surrounding each site, will be safeguarded against development that would unnecessarily sterilise the sites or prejudice or jeopardise their use by creating incompatible land uses nearby. <u>Exemptions</u> This policy does not apply to the following: • Applications for householder development • Applications for alterations to existing buildings and for change of use of existing development, unless intensifying activity on site • Applications for Advertisement Consent • Applications for Listed Building Consent • Applications for reserved matters including subsequent applications after outline consent has been granted • Prior Notifications (telecommunications; forestry; agriculture; demolition)	There are a number of exemptions to the policy, which do not include development, such as the Proposed Development. However, the Proposed Development does not encroach into the safeguarding areas for Whisby Quarry, Norton Bottoms Quarry and Swinderby Airfield, as shown on **Figure 1: Existing Minerals Sites and Site Allocations** of **Appendix 12-C: Minerals Safeguarding Assessment** of the ES **[EN010154/APP/6.3]** therefore it would not sterilise the sites or prejudice or jeopardise their use.

- Certificates of Lawfulness of Existing or Proposed Use or Development (CLUEDS and CLOPUDs)
- Applications for Tree Works

Central Lincolnshire Local Plan (Adopted April 2023)

Only the relevant parts of policies are included in this table. All policy text that is not relevant to the Proposed Development has been removed.

Policy reference	Policy description	Compliance commentary
Policy S1: The Spatial Strategy and Settlement Hierarchy	The spatial strategy will focus on delivering sustainable growth for Central Lincolnshire that meets the needs for homes and jobs, regenerates places and communities, and supports necessary improvements to facilities, services and infrastructure. Development should create strong, sustainable, cohesive and inclusive communities, making the most effective use of previously developed land and enabling a larger number of people to access jobs, services and facilities locally. Development should provide the scale and mix of housing types and a range of new job opportunities that will meet the identified needs of Central Lincolnshire in order to secure balanced communities. Decisions on investment in services and facilities, and on the location and scale of development, will be assisted by the Central Lincolnshire Settlement Hierarchy. The hierarchy is as follows:	The Proposed Development is located within the countryside. As acknowledged by Part 8 (b) of this policy, development within the countryside is not allowed unless it is for renewable energy generation (amongst other types of development). The **Statement of Need [EN010154/APP/7.1]** and Section 5 of the **Planning Statement [EN010154/APP/7.2]** set out how the Proposed Development would be a critical part of the national portfolio of renewable energy generation that is required for the nation to decarbonise its energy supply quickly. The Site Selection Process is presented within **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]**. **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]** describes the potential sites considered which have been assessed against a range of planning, environmental and operational criteria in order to identify a suitable location for a generating station with capacity more than 50MW. This report concludes that the location of the Proposed Development comprises a suitable site taking into

Policy reference	Policy description	Compliance commentary
	1. Lincoln Urban Area 2. Main Towns 3. Market Towns 4. Large Villages 5. Medium Villages 6. Small Villages 7. Hamlets 8. Countryside Unless allowed by: a) policy in any of the levels 1-7 above; or b) any other policy in the Local Plan (such as Policies S4, S5, S34, or S43) or a relevant policy in a neighbourhood plan, development will be regarded as being in the countryside and as such restricted to: • that which is demonstrably essential to the effective operation of agriculture, horticulture, forestry, outdoor recreation, transport or utility services; • delivery of infrastructure; • renewable energy generation; and • minerals or waste development in accordance with separate Minerals and Waste Local Development Documents.	account planning and environmental constraints and operational considerations. The Proposed Development is therefore considered to represent an acceptable form of development within the countryside and would therefore comply with this policy.
Policy S5: Development in the Countryside	**Part E: Non-residential development in the countryside**	A response to the points in Part E of this Policy are set out below:

Policy reference	Policy description	Compliance commentary
	Proposals for non-residential development will be supported provided that: a. The rural location of the enterprise is justifiable to maintain or enhance the rural economy or the location is justified by means of proximity to existing established businesses or natural features; b. The location of the enterprise is suitable in terms of accessibility; c. The location of the enterprise would not result in conflict with neighbouring uses; and d. The development is of a size and scale to commensurate with the proposed use and with the rural character of the location.	a. The Site Selection Process is presented within Appendix A: Site Selection Report of the Planning Statement [EN010154/APP/7.2]. Appendix A: Site Selection Report of the Planning Statement [EN010154/APP/7.2] describes the potential sites considered which have been assessed against a range of planning, environmental and operational criteria in order to identify a suitable location for a generating station with capacity more than 50MW. This report concludes that the location of the Proposed Development comprises a suitable site taking into account planning and environmental constraints and operational considerations. b. **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]** provides an assessment of impacts from the Proposed Development on traffic and transport, which as set out in Section 13.4 includes consideration of access and safety. Section 13.9 of **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]** concludes there are no significant residual effects on any

Policy reference	Policy description	Compliance commentary
		traffic or transport receptors anticipated. Hence there are no unacceptable impacts on highway safety anticipated. c. The Order Limits and surrounding context are described in **Chapter 2: Site and Surroundings** of the ES **[EN010154/APP/6.1]** and summarised within Section 3 of the **Planning Statement [EN010154/APP/7.2].** There are no uses within or surrounding the Order Limits that are considered to conflict with the Proposed Development. d. The Government has identified through its energy policies, most recently in the NPS EN-1 and NPS EN-3, that there is an urgent need for large scale capacity low-carbon energy generation in the UK. As discussed in the **Planning Statement [EN010154/APP/7.2]** and **Statement of Need [EN010154/APP/7.1]**, EN-1 and EN-3 identify large-scale solar energy generation as being required to meet this need. Developing the Proposed Development at this size and scale will therefore be an important contribution to meeting this urgent need and, as such, there is a clear and accepted case for the

Policy reference	Policy description	Compliance commentary
		Proposed Development. The **Design Approach Document [EN010154/APP/7.3]** demonstrates how the design of the Proposed Development has evolved with a clear Design Vision and Design Principles, resulting in positive outcomes including the delivery of sustainable infrastructure that is sensitive to place.
Policy S10: Supporting the Circular Economy	The Joint Committee is aware of the high energy and material use consumed on a daily basis, and, consequently, is fully supportive of the principles of a circular economy. Accordingly, and to complement any policies set out in the Minerals and Waste Development Plan, proposals will be supported, in principle, which demonstrate their compatibility with, or the furthering of, a strong circular economy in the local area (which could include cross-border activity elsewhere in Lincolnshire).	Section 14.5 of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** sets out the arrangements, such as the reuse of excavated material which would be implemented via a Materials Management Plan (if required) in accordance with the CL:AIRE DoW CoP, exemption or environmental permit, that are proposed for managing any waste produced by the Proposed Development, in accordance with the waste hierarchy. Measures and procedures to reduce impacts of waste are set out in the following: a. The **Framework Construction Environmental Management Plan (CEMP) [EN010154/APP/7.7]** which will be secured under Requirement 12, and the **Framework Operational Environmental Management Plan (OEMP) [EN010154/APP/7.8]** which will be secured under Requirement 13 of

Policy reference	Policy description	Compliance commentary
		Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]** include the implementation of industry standard practice and control measures for environmental impacts arising during construction and operation respectively. b. The **Framework Decommissioning Environmental Management Plan (DEMP) [EN010154/APP/7.9]**, which will be secured under Requirement 20 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]** includes the removal and recycling or disposal, in accordance with good practice measures, of all the infrastructure associated with the Proposed Development.
Policy S11: Embodied Carbon	All development should, where practical and viable, take opportunities to reduce the development's embodied carbon content, through the careful choice, use and sourcing of materials. **Presumption against demolition**: To avoid the wastage of embodied carbon in existing buildings and avoid the creation of new embodied carbon in replacement buildings, there is a presumption in favour of repairing, refurbishing, re-using and re-purposing	A Greenhouse Gas Assessment (GHG) is set out in **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** and includes consideration of embodied carbon. It is noted that the Proposed Development does not include the demolition of any buildings. Measures for reducing construction GHG impacts are suggested in the **Framework CEMP [EN010154/APP/7.7]** and **Framework DEMP [EN010154/APP/7.9]** to be secured in detail via

Policy reference	Policy description	Compliance commentary
	existing buildings over their demolition. Proposals that result in the demolition of a building (in whole or a significant part) should be accompanied by a full justification for the demolition. For non-listed buildings demolition will only be acceptable where it is demonstrated to the satisfaction of the local planning authority that: 1. the building proposed for demolition is in a state of such disrepair that it is not practical or viable to be repaired, refurbished, re-used, or re-purposed; or 2. repairing, refurbishing, re-using, or re-purposing the building would likely result in similar or higher newly generated embodied carbon than if the building is demolished and a new building is constructed; or 3. repairing, refurbishing, re-using, or re-purposing the building would create a building with such poor thermal efficiency that on a whole life cycle basis (i.e. embodied carbon and in-use carbon emissions) would mean a lower net carbon solution would arise from demolition and re-build; or 4. demolition of the building and construction of a new building would, on an exceptional basis, deliver other significant public benefits that outweigh the carbon savings which would arise from the building being repaired, refurbished, re-used, or re-purposed.	requirements 12 and 20 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. The Proposed Development has been designed, constructed and implemented in such a way as to minimise the creation of waste and maximise the use of alternative materials with lower embodied carbon, such as locally sourced products and materials with a higher recycled content where feasible. The assessment concludes that the effects of GHG emissions arising from construction and decommissioning are anticipated to result in minor adverse, but with mitigation measures, non-significant effects. The operational phase of the Proposed Development is considered to have one significant effect which is beneficial due to the net GHG impacts being below zero and resulting in a reduction in the atmospheric GHG concentration when compared to a without-project baseline, where net zero is substantially exceeded.

Policy reference	Policy description	Compliance commentary
	Applications within the countryside relating to the re-use or conversion of existing buildings will only be acceptable where they also meet the requirements of Policy S5, S34, or S43 as applicable.	
Policy S14: Renewable Energy	The Central Lincolnshire Joint Strategic Planning Committee is committed to supporting the transition to a net zero carbon future and will seek to maximise appropriately located renewable energy generated in Central Lincolnshire (such energy likely being wind and solar based). Proposals for renewable energy schemes, including ancillary development, will be supported where the direct, indirect, individual and cumulative impacts on the following considerations are, or will be made, acceptable. To determine whether it is acceptable, the following tests will have to be met: a. The impacts are acceptable having considered the scale, siting and design, and the consequent impacts on landscape character; visual amenity; biodiversity; geodiversity; flood risk; townscape; heritage assets, their settings and the historic landscape; and highway safety and rail safety; and b. The impacts are acceptable on aviation and defence navigation system/communications; and	The **Statement of Need [EN010154/APP/7.1]** and Section 5 of the **Planning Statement [EN010154/APP/7.2]** demonstrate the role the Proposed Development, if consented, will play in producing the energy required for the UK as a result of its significant contribution to the urgent need for low carbon electricity generation. The Proposed Development would be a critical part of the national portfolio of renewable energy generation that is required for the nation to decarbonise its energy supply quickly. The **Design Approach Document [EN010154/APP/7.3]** outlines details of how the design has developed prior to submission. The design presented at the DCO application stage represents the outcome of several design iterations, including feedback from non-statutory and statutory consultation, ongoing technical engagement with stakeholders, discussions with landowners and the outcomes of environmental assessment. Assessments of the impacts on landscape character; visual amenity; biodiversity; geodiversity; flood risk; townscape; heritage assets, their settings and the

Policy reference	Policy description	Compliance commentary
	c. The impacts are acceptable on the amenity of sensitive neighbouring uses (including local residents) by virtue of matters such as noise, dust, odour, shadow flicker, air quality and traffic; Testing compliance with part (i) above will be via applicable policies elsewhere in a development plan document for the area (i.e. this Local Plan; a Neighbourhood Plan, if one exists; any applicable policies in a Minerals or Waste Local Plan); and any further guidance set out in a Supplementary Planning Document. In order to test compliance with part (ii) above will require, for relevant proposals, the submission by the applicant of robust evidence of the potential impact on any aviation and defence navigation system/communication, and within such evidence must be documented areas of agreement or disagreement reached with appropriate bodies and organisations responsible for such infrastructure. In order to test compliance with part (iii) above will require, for relevant proposals, the submission by the applicant of a robust assessment of the potential impact on such users, and the mitigation measures proposed to minimise any identified harm.	historic landscape; and highway safety and rail safety, aviation and amenity are set out in the following chapters of the ES **[EN010154/APP/6.1]**: a. **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]** which concludes that there are anticipated to be no adverse effects to archaeology and designated heritage assets, historic buildings and historic landscape elements; b. **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** which concludes that the construction, operation and decommissioning of the Proposed Development are unlikely to result in any significant adverse effects to biodiversity; c. **Chapter 9: Water Environment of** the ES **[EN010154/APP/6.1]** and **Appendix 9-C: Flood Risk Assessment** of the ES **[EN010154/APP/6.3],** demonstrates that flood risk, from all sources, will not increase as a result of the Proposed Development, within the DCO Site or elsewhere, with the proposed embedded mitigation in place;

Policy reference	Policy description	Compliance commentary
	For all matters in (i)-(iii), the applicable local planning authority may commission its own independent assessment of the proposals, to ensure it is satisfied what the degree of harm may be and whether reasonable mitigation opportunities are being taken. Where significant adverse effects are concluded by the local planning authority following consideration of the above assessment(s), such effects will be weighed against the wider environmental, economic, social and community benefits provided by the proposal. In this regard, and as part of the planning balance, significant additional weight in favour of the proposal will arise for any proposal which is community-led for the benefit of that community. In areas that have been designated for their national importance, as identified in the National Planning Policy Framework, renewable energy infrastructure will only be permitted where it can be demonstrated that it would be appropriate in scale, located in areas that do not contribute positively to the objectives of the designation, is sympathetically designed and includes any necessary mitigation measures. **Additional matters for solar based energy proposals**	d. **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** which concludes that there will be an adverse impact on the surrounding landscape and visual amenity caused by the Proposed Development during the operational phase and there will be long-term moderate to major adverse effects on landscape character and visual amenity. In most instances, these impacts can be adequately mitigated but, in some instances, there will be residual adverse impacts resulting in harm which needs to be weighed in the planning balance. e. **Chapter 11: Noise and Vibration** of the ES **[EN010154/APP/6.1]** which confirms that no significant effects are anticipated in relation to noise and vibration from the Proposed Development; f. **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]** concludes that there are no residual significant effects of the Proposed Development on any of the Traffic and Transport receptors; and

Policy reference	Policy description	Compliance commentary
	Proposals for solar thermal or photovoltaics panels and associated infrastructure to be installed on existing property will be under a presumption in favour of permission unless there is clear and demonstrable significant harm arising. Proposals for ground based photovoltaics and associated infrastructure, including commercial large scale proposals, will be under a presumption in favour unless: a. there is clear and demonstrable significant harm arising; or b. the proposal is (following a site specific soil assessment) to take place on Best and Most Versatile (BMV) agricultural land and does not meet the requirements of Policy S67; or c. the land is allocated for another purpose in this Local Plan or other statutory based document (such as a nature recovery strategy or a Local Transport Plan), and the proposal is not compatible with such other allocation. Proposals for ground based photovoltaics should be accompanied by evidence demonstrating how opportunities for delivering biodiversity net gain will be maximised in the scheme taking account of soil, natural features, existing habitats, and planting proposals	g. **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** and **Appendix 14-D: Glint and Glare Assessment** of the ES **[EN010154/APP/6.3]** concludes that there are no significant residual effects anticipated as a result of the Proposed Development due to glint and glare. As set out in Sections 7 and 8 of the **Planning Statement [EN010154/APP/7.2]**, the substantial benefits of the Proposed Development clearly and demonstrably outweigh the harms that would arise with the proposed mitigation measures in place. Adverse effects would be localised, short-term, temporary and/or reversible at the end of the Proposed Development's lifetime. <u>Additional matters for solar based energy proposals:</u> The Applicant notes that there is a presumption in favour of ground mounted solar photovoltaics subject to the following points: a. Effects from the Proposed Development are weighed in detail in the appraisal in Section 6 of the **Planning Statement [EN010154/APP/7.2]** and in the planning balance in Section 7 of the **Planning Statement [EN010154/APP/7.2]** and there

Policy reference	Policy description	Compliance commentary
	accompanying the scheme to create new habitats linking into the nature recovery strategy. **Decommissioning renewable energy infrastructure** Permitted proposals will be subject to a condition that will require the submission of an End of Life Removal Scheme within one year of the facility becoming non-operational, and the implementation of such a scheme within one year of the scheme being approved. Such a scheme should demonstrate how any biodiversity net gain that has arisen on the site will be protected or enhanced further, and how the materials to be removed would, to a practical degree, be re-used or recycled.	is no clear or demonstrable significant harm arising. b. The Proposed Development has been designed to take into account sensitive receptors, such as by positioning the above ground infrastructure to avoid BMV land as far as practicable. Further information on the process is set out in **Chapter 4: Alternatives and Design Evolution** of the ES **[EN010154/APP/6.1]**. These measures have been incorporated in each stage of the design of the Proposed Development from site selection as detailed in **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]** to the **Framework Soil Management Plan [EN010154/APP/7.10]** which includes further mitigation measures for soils to be secured under Requirement 15 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. c. The land is not allocated for other development. In terms of Biodiversity Net Gain (BNG), as detailed within the **BNG Report [EN010154/APP/7.12]**, based on the illustrative design, the Proposed Development

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		will achieve a net gain of 30% for area-based habitat units; 50% for hedgerow units; and 10% for watercourses. This will be managed through the **Framework Landscape and Ecological Management Plan (LEMP) [EN010154/APP/7.15]** and will be secured via Requirement 8 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. For decommissioning renewable energy infrastructure, as described in **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]**, the operational life of the Proposed Development will be 60 years from the point of commissioning of the entirety of the Proposed Development. The **Framework DEMP [EN010154/APP/7.9]** sets out during decommissioning, all infrastructure associated with the Proposed Development will be removed and recycled or disposed of in accordance with good practice and market conditions at that time. This is with the exception of the cabling and/or cable ducting in the Cable Corridor, which may remain in-situ. A detailed DEMP will be secured via Requirement 20 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1].**

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Policy S15: Protecting Renewable Energy Infrastructure	Development should not significantly harm: a. the technical performance of any existing or approved renewable energy generation facility; b. the potential for optimisation of strategic renewable energy installations; c. the availability of the resource, where the operation is dependent on uninterrupted flow of energy to the installation.	Section 3.4 of the **Planning Statement [EN010154/APP/7.2]** sets out the relevant planning history for the Proposed Development. The Order Limits of the Proposed Development overlap with the Springwell and Leoda projects at the proposed National Grid substation near Navenby. Engagement between the Applicant for Fosse Green Energy and the applicants for the Springwell and Leoda projects has been undertaken during the pre-application stage and will continue as the project progresses.
Policy S16: Wider Energy Infrastructure	The Joint Committee is committed to supporting the transition to net zero carbon future and, in doing so, recognises and supports, in principle, the need for significant investment in new and upgraded energy infrastructure. Where planning permission is needed from a Central Lincolnshire authority, support will be given to proposals which are necessary for, or form part of, the transition to a net zero carbon sub-region, which could include: energy storage facilities (such as battery storage or thermal storage); and upgraded or new electricity facilities (such as transmission facilities, sub-stations or other electricity infrastructure. However, any such proposals should take all reasonable opportunities to mitigate any harm arising from such	The **Statement of Need [EN010154/APP/7.1]** and Section 5 of the **Planning Statement [EN010154/APP/7.2]** set out how the Proposed Development would be a critical part of the national portfolio of renewable energy generation that is required for the nation to decarbonise its energy supply quickly. The mitigation hierarchy has been applied to the design and development of the Proposed Development as discussed in Section 7 of the **Planning Statement [EN010154/APP/7.2]**. The site selection process is presented within **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]**. **Appendix A: Site**

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	proposals, and take care to select not only appropriate locations for such facilities, but also design solutions (see Policy S53) which minimises harm arising.	**Selection Report** of the **Planning Statement [EN010154/APP/7.2]** describes the potential sites considered which have been assessed against a range of planning, environmental and operational criteria in order to identify a suitable location for a generating station with capacity more than 50MW. This report concludes that the location of the Proposed Development comprises a suitable site taking into account planning and environmental constraints and operational considerations. **Chapter 4: Alternatives and Design Evolution** of the ES **[EN010154/APP/6.1]** details the consideration of alternatives and the evolution of design with regard to the required policy considerations.
Policy S21: Flood Risk and Water Resources	**Flood Risk** All development proposals will be considered against the NPPF, including application of the sequential and, if necessary, the exception test. Through appropriate consultation and option appraisal, development proposals should demonstrate: a. that they are informed by and take account of the best available information from all sources of flood risk and by site specific flood risk assessments where appropriate;	**Flood Risk** A site-specific flood risk assessment is provided in **Appendix 9-C: Flood Risk Assessment (FRA)** of the ES **[EN010154/APP/6.3]**. **Appendix 9-C: FRA** of the ES **[EN010154/APP/6.3]** contains details as to the compliance of the Proposed Development with the Sequential Test. The role of the Sequential Test in the site selection process is further detailed in Section 3 of **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]**.

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	b. that the development does not place itself or existing land or buildings at increased risk of flooding; c. that the development will be safe during its lifetime taking into account the impacts of climate change and will be resilient to flood risk from all forms of flooding such that in the event of a flood the development could be quickly brought back into use without significant refurbishment; d. that the development does not affect the integrity of existing flood defences and any necessary flood mitigation measures have been agreed with the relevant bodies, where adoption, ongoing maintenance and management have been considered and any necessary agreements are in place; e. how proposals have taken a positive approach to reducing overall flood risk and have considered the potential to contribute towards solutions for the wider area; and f. that they have incorporated Sustainable Drainage Systems (SuDS)/ Integrated Water Management into the proposals unless they can be shown to be inappropriate.	The Planning Statement appraisal in Section 6 of the **Planning Statement [EN010154/APP/7.2]** sets out how the Proposed Development passes the test. To summarise, **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]** concludes that the location of the Proposed Development comprises the preferred site when compared with other potential alternative sites when taking into account planning and environmental constraints and operational considerations. In accordance with the sequential approach, all proposed buildings, compound areas, the Onsite Substation and BESS and the majority of the solar PV panels will be located in Flood Zone 1. **Appendix 9-C: FRA** of the ES **[EN010154/APP/6.3]** demonstrates the following: a. The FRA is informed by the latest data and guidance available. b. The FRA concludes that flood risk from all sources will not increase as a result of the Proposed Development, within the DCO Site or elsewhere, with the proposed embedded mitigation measures in place. c. The FRA concludes that the area of the Proposed Development remains safe for its
	Protecting the Water Environment	

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	Development proposals that are likely to impact on surface or ground water should consider the requirements of the Water Framework Directive. Development proposals should demonstrate: that water is available to support the development proposed; a. that adequate mains foul water treatment and disposal already exists or can be provided in time to serve the development. Non mains foul sewage disposal solutions should only be considered where it can be shown to the satisfaction of the local planning authority that connection to a public sewer is not feasible; b. that they meet the Building Regulation water efficiency standard of 110 litres per occupier per day or the highest water efficiency standard that applies at the time of the planning application (see also Policy S12); c. that water reuse and recycling and rainwater harvesting measures have been incorporated wherever possible in order to reduce demand on mains water supply as part of an integrated approach to water management (see also Policy S11);	lifetime taking into account the impact of Climate Change. d. There are existing flood defences along the River Witham and River Brant that are within the Principal Site. The Proposed Development will not impact on these flood defences. e. The Proposed Development has been designed positively with considerations of flood risk being a Design Principle, as set out in the **Design Approach Document [EN010154/APP/7.3]**. f. Surface water is considered within **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]** with mitigation measures including the use of SuDS outlined through **Appendix 9-D: Framework Surface Water Drainage Strategy [EN010154/APP/6.3].** The assessment considers flood risk across all stages of development. The FRA considers the potential sources of flooding and assesses the risk of flooding to the Proposed Development. The FRA concludes that flood risk from all sources will not increase as a result of the Proposed Development, within the DCO Site or elsewhere, with the proposed embedded mitigation measures in place.

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	d. that they have followed the surface water hierarchy for all proposals: i. surface water runoff is collected for use; ii. discharge into the ground via infiltration; iii. discharge to a watercourse or other surface water body; iv. discharge to a surface water sewer, highway drain or other drainage system, discharging to a watercourse or other surface water body; v. discharge to a combined sewer; k. that no surface water connections are made to the foul system; l. that surface water connections to the combined or surface water system are only made in exceptional circumstances where it can be demonstrated that there are no feasible alternatives (this applies to new developments and redevelopments) and where there is no detriment to existing users; m. that no combined sewer overflows are created in areas served by combined sewers, and that foul and surface water flows are separated; n. that development contributes positively to the water environment and its ecology where possible and does not adversely affect surface and ground water	**Protecting the Water Environment** **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]** assesses all impacts on the water environment. Section 9.6 lists mitigation measures taken following the assessment of impacts on the water environment. Following the implementation of standard and embedded mitigations, there are no likely significant effects resulting from any stage of development as a result of the Proposed Development. The Proposed Development is compliant with the objectives of the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 as it would not cause deterioration in the status of the water bodies and would not prevent the water bodies achieving Good Ecological Status and Good Ecological Potential. Impacts of surface and groundwater quality, groundwater resources and hydrology are sought to be controlled by the **Framework CEMP [EN010154/APP/7.7]**, **Framework OEMP [EN010154/APP/7.8]** and **Framework DEMP EN010154/APP/7.9].** Detailed versions of these plans will be produced and secured via requirements 12,13,

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	quality in line with the requirements of the Water Framework Directive; o. that development with the potential to pose a risk to groundwater resources is not located in sensitive locations to meet the requirements of the Water Framework Directive; p. how Sustainable Drainage Systems (SuDS)/ Integrated Water Management to deliver improvements to water quality, the water environment and to improve amenity and biodiversity net gain wherever possible have been incorporated into the proposal unless they can be shown to be impractical; q. that relevant site investigations, risk assessments and necessary mitigation measures for source protection zones around boreholes, wells, springs and water courses have been agreed with the relevant bodies (e.g. the Environment Agency and relevant water companies); r. that suitable access is safeguarded for the maintenance of watercourses, water resources, flood defences and drainage infrastructure; and s. that adequate provision is made to safeguard the future maintenance of water bodies to which surface water and foul water treated on the site of the development is discharged, preferably by an appropriate authority (e.g. Environment Agency,	and 20 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. A detailed surface and foul water drainage strategy is also to be secured by Requirement 10 which will require approval from the relevant planning authorities and lead local flood authorities in North Kesteven District Council and Lincolnshire County Council, as outlined in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. **Appendix 9-D: Framework Surface Water Drainage Strategy** of the ES **[EN010154/APP/6.3]** details the drainage of the Proposed Development, including the drainage design of the Principal Site and handling surface water generated by new impermeable areas within the Principal Site. This includes consideration of the Surface Water Hierarchy. As set out in the **Consultation Report [EN010154/APP/5.1],** the Applicant has engaged with the Environment Agency and internal drainage boards during the statutory consultation and through ongoing technical engagement.

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	Internal Drainage Board, Water Company, the Canal and River Trust or local Council). In order to allow access for the maintenance of watercourses, development proposals that include or abut a watercourse should ensure no building, structure or immovable landscaping feature is included that will impede access within 8m of a watercourse, or within 16m of a tidal watercourse. Conditions may be included where relevant to ensure this access is maintained in perpetuity and may seek to ensure responsibility for maintenance of the watercourse including land ownership details up to and of the watercourse is clear and included in maintenance arrangements for future occupants.	
Policy S45: Strategic Infrastructure Requirements	New Development should be supported by, and have good access to infrastructure. **Infrastructure** Planning permission will only be granted if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet all the necessary requirements arising from the proposed development. Development proposals must consider all of the infrastructure implications of a scheme; not just those on the site or its immediate vicinity. Conditions or planning obligations, as part of a package or combination of infrastructure delivery measures, are likely to be required	**Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]** considers the impact of the Proposed Development on the existing road infrastructure and concludes that there are no residual significant effects of the Proposed Development found on any of the Traffic and Transport receptors during construction and decommissioning. A **Framework Construction Traffic Management Plan (CTMP) [EN010154/APP/7.18]** has also been prepared which sets out the measures to manage construction traffic and staff vehicles within the vicinity of the Proposed Development along the local highway network during the peak construction period of the works, in order to limit any potential disruptions and implications on the

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	for many proposals to ensure that new development meets this principle. Consideration must be given to the likely timing of infrastructure provision. As such, development may need to be phased. Conditions or a planning obligation may be used to secure this phasing arrangement. **Development Contributions** Developers will be expected to contribute towards the delivery of relevant infrastructure, either through direct provision or contribution towards the provision of local and strategic infrastructure to meet the needs arising from the development either alone or cumulatively with other developments.	wider transport network. Production of a detailed CTMP is secured under Requirement 14 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1].**
Policy S47: Accessibility and Transport	Development proposals which contribute towards an efficient and safe transport network that offers a range of transport choices for the movement of people and goods will be supported. All developments should demonstrate, where appropriate, that they have had regard to the following criteria: g. Located where travel can be minimised and the use of sustainable transport modes maximised; h. Minimise additional travel demand through the use of measures such as travel planning, safe and convenient public transport, car clubs, walking and	As described in **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]**, access for construction traffic has been a key consideration as part of the Proposed Development's site selection. This includes looking at the general suitability of the public highway, distance to the primary road network, sensitivity of land uses along the route to the primary road network, physical or engineering constraints (bridges, level crossings, visibility, access points etc.) and access to fields without having to remove hedgerows where possible.

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	cycling links and integration with existing infrastructure; i. Making allowance for low and ultra-low emission vehicle refuelling infrastructure. To demonstrate that developers have considered and taken into account the requirements of this policy, an appropriate Transport Statement/ Assessment and/ or Travel Plan should be submitted with proposals, with the precise form dependent on the scale and nature of development and agreed through early discussion with the local planning or highway authority and external bodies where relevant. Any development that has severe transport implications will not be granted planning permission unless deliverable mitigation measures have been identified, and arrangements secured for their implementation, which will make the development acceptable in transport terms.	Consultation undertaken with relevant stakeholders is set out in **Table 13-1: Scoping Opinion Responses** of **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1].** This consultation informed the traffic and transport assessment of the Proposed Development is provided in **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]**. Section 6 of this chapter outlines the embedded mitigation for the Proposed Development which includes providing suitable points of access for construction vehicles with adequate visibility, with any supporting improvements (e.g. vegetation clearance) to take place within the highway boundary and the DCO Site if required and delivering internal construction routes through the Principal Site, to allow vehicles to access all areas via the site access points. A detailed CTMP, substantially in accordance with the **Framework CTMP [EN010154/APP/7.18],** is secured under Requirement 14 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. As described in Section 13.10 of **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]**, cumulative effects during the operational phase of the Proposed Development are not expected as the number of trips associated with the operational phase of the Proposed Development is expected to be minimal.

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Policy S48: Walking and Cycling Infrastructure	Development proposals should facilitate active travel by incorporating measures suitable for the scheme from the design stage. Plans and evidence accompanying applications will demonstrate how the ability to travel by foot or cycle will be actively encouraged by the delivery of well designed, safe and convenient access for all both into and through the site. Priority should be given to the needs of pedestrians, cyclists, people with impaired mobility and users of public transport by providing a network of high quality pedestrian and cycle routes and green corridors, linking to existing routes and public rights of way where opportunities exist, that give easy access and permeability to adjacent areas. Proposals will: a. protect, maintain and improve existing infrastructure, including closing gaps or deficiencies in the network and connecting communities and facilities; b. provide high quality attractive routes that are safe, direct, legible and pleasant and are integrated into the wider network; c. ensure the provision of appropriate information, including signposting and way-finding to encourage the safe use of the network; d. encourage the use of supporting facilities, especially along principle cycle routes;	The Proposed Development has considered existing Public Rights of Way (PRoW) in the site selection and evolution of design, seeking to retain them where possible. This is discussed in further detail within the **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]**. **Chapter 12: Socio-Economics and Land Use** of the ES **[EN010154/APP/6.1]** assesses the impacts of the Proposed Development on PRoW in Section 12.5. The Proposed Development would require the long term closure and diversion of the following PRoW: a. LL/Aubo/10/1 PRoW; b. LL/TOTH/13/1 PRoW; and c. LL/ThuN/2/1. Given the large network of PRoWs, roads and existing permissive paths in the area that could be used as substitutes, the sensitivity of the PRoWs being assessed to be low and the short journey increases, the effects would be negligible. A **Framework Public Rights of Way Management Plan (PRoW-MP) [EN010154/APP/7.14]** has been prepared as part of the DCO application which details the mitigation measures which will be used to reduce the impacts of the Proposed Development on PRoW. The Proposed Development will also create a number

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	e. make provision for secure cycle parking facilities in new developments and in areas with high visitor numbers across Central Lincolnshire; and f. consider the needs of all users through inclusive design	of new permissive paths across the Principal Site totalling approximately 9.5km in length. Further mitigation measures are provided in the **Framework CEMP [EN010154/APP/7.7]**, **Framework OEMP [EN010154/APP/7.8],** and the **Framework DEMP [EN010154/APP/7.9]**. With the embedded mitigation measures implemented **Chapter 12: Socio-Economics and Land Use** of the ES **[EN010154/APP/6.1]** concludes all impacts upon PRoW to be not significant for all phases of development. The Principal Site has been designed to fit within the network of PRoW and existing permissive paths to further enhance the local connectivity. The provision and management of permissive paths is detailed within the **Framework PRoW-MP [EN010154/APP/7.14]** and is to be secured by requirements 17 (Permissive Paths) and 18 (Public right of way) of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Policy S53: Design and Amenity	All development, including extensions and alterations to existing buildings, must achieve high quality sustainable design that contributes positively to local character, landscape and townscape, and supports diversity, equality and access for all.	As set out in the **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]** and Section 3.2 of the **Design Approach Document [EN010154/APP/7.3]**, the Applicant identified Lincolnshire as an optimal area within the UK to locate a large-scale solar development due to its good levels

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	Good design will be at the centre of every development proposal and this will be required to be demonstrated through evidence supporting planning applications to a degree proportionate to the proposal. Design Codes may be produced for parts of Central Lincolnshire or in support of specific developments. The approach taken in these Design Codes should be informed by the National Model Design Code and where these codes have been adopted, developments will be expected to adhere to the Code. All development proposals will be assessed against, and will be expected to meet the following relevant design and amenity criteria. All development proposals will: **1. Context** a. Be based on a sound understanding of the context, integrating into the surroundings and responding to local history, culture and heritage; b. Relate well to the site, its local and wider context and existing characteristics including the retention of existing natural and historic features wherever possible and including appropriate landscape and boundary treatments to ensure that the development can be satisfactorily assimilated into the surrounding area; c. Protect any important local views into, out of or through the site; **2. Identity**	of irradiation and large areas of open flat land. Following engagement with National Grid, the Applicant secured a point of connection at the proposed National Grid substation near Navenby. The proposed National Grid substation near Navenby does not form part of this application and is subject to a separate decision-making process under the Town and County Planning Act 1990. Design is considered in the site selection which sought to identify a site that was as least environmentally constrained as possible, whilst also meeting operational requirements. The **Design Approach Document [EN010154/APP/7.3]** outlines details of how the design has developed prior to submission. The design presented at the DCO application stage represents the outcome of several design iterations, including feedback from non-statutory and statutory consultation, ongoing technical engagement with stakeholders, discussions with landowners and the outcomes of environmental assessment. **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** and **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]** consider the impacts of the Proposed Development on the local character and history, including important views. A

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	a. Contribute positively to the sense of place, reflecting and enhancing existing character and distinctiveness; b. Reflect or improve on the original architectural style of the local surroundings, or embrace opportunities for innovative design and new technologies which sympathetically complement or contrast with the local architectural style; c. Use appropriate, high quality materials which reinforce or enhance local distinctiveness; d. Not result in the visual or physical coalescence with any neighbouring settlement nor ribbon development; **3. Built Form** a. Make effective and efficient use of land that contribute to the achievement of compact, walkable neighbourhoods; b. Be appropriate for its context and its future use in terms of its building types, street layout, development block type and size, siting, height, scale, massing, form, rhythm, plot widths, gaps between buildings, and the ratio of developed to undeveloped space both within a plot and within a scheme; c. Achieve a density not only appropriate for its context but also taking into account its accessibility;	summary of this appraisal is contained with Section 6.3 of the Planning Statement. The impact of the Proposed Development upon the landscape and heritage assets has been a key consideration in the design evolution of the Proposed Development as demonstrated with the focussed Design Principles on landscape and the historic environment, as set out in Section 3.8 of the **Design Approach Document [EN010154/APP/7.3]**. The Principal Site has been designed to fit within the network of PRoW and existing permissive paths to further enhance the local connectivity. The provision and management of permissive paths is detailed within the **Framework PRoW-MP [EN010154/APP/7.14]** and are to be secured by Requirement 18 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. The Applicant has sought to provide habitat enhancement on site. Habitat creation, management and monitoring details are set out in the **Framework LEMP [EN010154/APP/7.15],** secured as Requirement 8 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**, to ensure mitigation and enhancement measures are delivered successfully. The **Framework LEMP [EN010154/APP/7.15]** includes the landscaping and

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	d. Have a layout and form that delivers efficient and adaptable homes in accordance with Policy S6 and Policy S20. **4. Movement** a. Form part of a well-designed and connected travel network with consideration for all modes of transport offering genuine choices for non-car travel and prioritising active travel and where relevant demonstrate this through evidence clearly showing connectivity for all modes and a hierarchy of routes (also see Policy S47 and Policy S48); b. Maximise pedestrian and cycle permeability and avoid barriers to movement through careful consideration of street layouts and access routes both within the site and in the wider context contributing to the delivery of walkable and cyclable neighbourhoods in accordance with Policy S48; c. Ensure areas are accessible, safe and legible for all including people with physical accessibility difficulties; d. Deliver well-considered parking, including suitable electric vehicle charging points, with appropriate landscaping provided in accordance with the parking standards set out in Policy NS18 and Policy S49; e. Deliver suitable access solutions for servicing and utilities;	monitoring measures. Specific details on ecological enhancement proposed are set out in Section 5.3 of the **Planning Statement [EN010154/APP/7.2]**. As set out in **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1],** consideration has been given to materials used in the Proposed Development. The Applicant has sought to design the Proposed Development in such a way as to minimise the creation of waste and maximise the use of alternative materials with lower embodied carbon, such as locally sourced products and materials with a higher recycled content where feasible. As described in **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]**, the operational life of the Proposed Development will be 60 years from the point of commissioning of the entirety of the Proposed Development. As set out in the **Framework DEMP [EN010154/APP/7.9],** during decommissioning, all infrastructure associated with the Proposed Development will be removed and recycled or disposed of in accordance with good practice and market conditions at that time. This is with the exception of the cabling and/or cable ducting in the Cable Corridor, which may remain in-situ.

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	5. Nature a. Incorporate and retain as far as possible existing natural features including hedgerows, trees, and waterbodies particularly where these features offer a valuable habitat to support biodiversity, aligned with policies in the Natural Environment chapter of the Local Plan; b. Incorporate appropriate landscape and boundary treatments to ensure that the development can be satisfactorily assimilated into the surrounding area, maximising opportunities to deliver diverse ecosystems and biodiverse habitats, strengthening wildlife corridors and green infrastructure networks, and helping to achieve wider goals for biodiversity net gain, climate change mitigation and adaptation and water management; **6. Public Spaces** a. Ensure public spaces are accessible to all, are safe and secure and will be easy to maintain with clear definition of public and private spaces; b. Form part of a hierarchy of spaces where relevant to offer a range of spaces available for the community and to support a variety of activities and encourage social interaction; c. Be carefully planned and integrated into the wider community to ensure spaces feel safe and are safe through natural surveillance, being flanked by	

Policy reference	Policy description	Compliance commentary
	active uses and by promoting activity within the space; d. Maximise opportunities for delivering additional trees and biodiversity gains through the creation of new habitats and the strengthening or extending wildlife corridors and the green infrastructure network in accordance with policies in the Natural Environment chapter; **7. Uses** a. Create or contribute to a variety of complementary uses that meet the needs of the community; b. Be compatible with neighbouring land uses and not result in likely conflict with existing uses unless it can be satisfactorily demonstrated that both the ongoing use of the neighbouring site will not be compromised, and that the amenity of occupiers of the new development will be satisfactory with the ongoing normal use of the neighbouring site; c. Not result in adverse noise and vibration taking into account surrounding uses nor result in adverse impacts upon air quality from odour, fumes, smoke, dust and other sources; **...9. Resources** a. Minimise the need for resources both in construction and operation of buildings and be easily adaptable to avoid unnecessary waste in accordance with Policies S10 and S11;	

Policy reference	Policy description	Compliance commentary
	b. Use high quality materials which are not only suitable for the context but that are durable and resilient to impacts of climate change in accordance with the requirements of Policy S20; **10. Lifespan** a. Use high quality materials which are durable and ensure buildings and spaces are adaptive; and b. Encourage the creation of a sense of ownership for users and the wider community with a clear strategy for ongoing management and stewardship Development proposals will be expected to satisfy requirements of any adopted local design guide or design code where relevant to the proposal.	
Policy S54: Health and Wellbeing	The potential for achieving positive mental and physical health outcomes will be taken into account when considering all development proposals. Where any potential adverse health impacts are identified, the applicant will be expected to demonstrate how these will be addressed and mitigated. The Central Lincolnshire authorities will expect development proposals to promote, support and enhance physical and mental health and wellbeing, and thus contribute to reducing health inequalities. This will be achieved by:	Health impacts are considered within the **ES [EN010154/APP/6.1]** for each relevant environmental aspect. Health impacts are considered within **Chapter 9: Water Environment**, **Chapter 10: Landscape and Visual Amenity**, **Chapter 11: Noise and Vibration**, **Chapter 12: Socio-Economic and Land Use, Chapter 13: Traffic and Transport**, and **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]**. The benefits of the Proposed Development, as detailed in Section 5 of the **Planning Statement [EN010154/APP/7.2]**, include ecological

Policy reference	Policy description	Compliance commentary
	a. Seeking, in line with the Central Lincolnshire Developer Contributions SPD, developer contributions towards new or enhanced health facilities from developers where development results in a shortfall or worsening of provision, as informed by the outcome of consultation with health care commissioners; b. In the case of development of 150 dwellings or more, or 5ha or more for other development, developers submitting a fit for purpose Health Impact Assessment (HIA) as part of the application or master planning stage where applicable, and demonstrating how the conclusions of the HIA have been taken into account in the design of the scheme. The HIA should be commensurate with the size of the development; c. Development schemes safeguarding and, where appropriate, creating or enhancing the role of allotments, orchards, gardens and food markets in providing access to healthy, fresh and locally produced food; and d. Ensuring quality green infrastructure provides adequate access to nature for its benefits to mental and physical health and wellbeing and potential to overcome health inequalities.	enhancements, provision of permissive paths, job creation, and economic benefits. Health impacts have been considered within the design of the Proposed Development through the inclusion of mitigation measures such as the following: a. Through the provision of offsets to residential properties to reduce noise and visual impacts; and b. The implementation of mitigation measures within the **Framework CTMP [EN010154/APP/7.18]** to reduce impacts from transport and traffic during construction. In addition, the Proposed Development will also create approximately 9.5km of new permissive paths. This will help to support mental and physical health and wellbeing and has the potential to overcome health inequalities as per section d. Section 6.2 of the **Planning Statement [EN010154/APP/7.2]** provides an appraisal of the effects of the Proposed Development on human health which includes physical and mental health and wellbeing. As demonstrated, health impacts have been considered in relevant assessments of the Proposed Development and suitable mitigation

Policy reference	Policy description	Compliance commentary
		measures have been incorporated where appropriate to minimise significant adverse effects. It is noted that significant adverse effects are predicted for three receptors due to noise and vibration from piling during construction. With the mitigation measures proposed within the **Framework CEMP [EN010154/APP/7.7]** and a detailed CEMP is to be provided and secured via Requirement 12 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**, the significant adverse vibration impacts during construction would be unlikely to occur and if they did would be temporary, short-term and minimised as far as reasonably practicable. Measures proposed in the **Framework LEMP [EN010154/APP/7.15]** such as the management of existing trees, shrubs and woodland, and species choice in the implementation of new habitats (woodland, tree belts, hedgerows and the community orchard) will support access to nature and therefore help to provide the associated benefits to mental and physical health and wellbeing. A Community Liaison Group (CLG) has been established for the Proposed Development where project updates and news will be shared directly by the Applicant to the community. This will help provide the local community with advance warning for some activities (such as the delivery of abnormal loads) and

Policy reference	Policy description	Compliance commentary
		progress updates on the works. It is anticipated this will assist the well-being of residents through introducing a mechanism, whereby residents can raise concerns, share information, and mediate conflicts. It is also anticipated that residents will be able to tolerate potential impacts better if they have an awareness of when certain activities are occurring and their duration. Requirement 5 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]** provides the framework for the established CLG.
Policy S56: Development on Land Affected by Contamination	Development proposals must take into account the potential environmental impacts on people, biodiversity, buildings, land, air and water arising from the development itself and any former use of the site, including, in particular, adverse effects arising from pollution. Where development is proposed on a site which is known to be or has the potential to be affected by contamination, a preliminary risk assessment should be undertaken by the developer and submitted to the relevant Central Lincolnshire Authority as the first stage in assessing the risk of contamination. Proposals will only be permitted if: a. it can be demonstrated that the site is suitable for its proposed use;	Impacts on biodiversity, air and water contamination are covered within the following chapters of the ES: a. **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]**; b. **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]**; and c. **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** As set out in **Appendix 14-C: Phase 1 Preliminary Risk Assessment,** based on a review of historical maps, the DCO Site has consisted of undeveloped land/agricultural fields since the earliest available historical maps (late 1800's). Potential contaminative

Policy reference	Policy description	Compliance commentary
	b. layout and drainage have taken adequate account of ground conditions, contamination and gas risks arising from previous uses and any proposed sustainable land remediation and c. there are no significant impacts on future users, neighbouring users, groundwater or surface water.	sources identified locally on-site may be associated with former pits which may have been filled with a variety of (potentially unlicensed) waste materials. Farmland, including current farm buildings and yards with fuel and agricultural materials storage, are also shown at various locations within or adjacent to the DCO Site. Swinderby Airfield is indicated within the central part of the Principal Site, to the east of Witham St Hughs (and extending off-site to the west). Section 14.4 of **Chapter 14: Other Environmental Topics** of the ES **[EN010154/APP/6.1]** assesses the impact of the Proposed Development on ground conditions (land) including from existing or historic uses. A Preliminary Risk Assessment (PRA) has been undertaken to assess the land condition and identify potential environmental land quality liabilities and constraints prior to the construction of the Proposed Development. As set out in **Appendix 14-C: Phase 1 Preliminary Risk Assessment** of the ES [**EN010154/APP/6.3]**, the potential risks from existing/historic uses of the DCO Site identified have been assessed as being very low to moderate / low, with the highest risks associated with the former Swinderby Airfield.The **Framework CEMP [EN010154/APP/7.7]** includes a commitment to stop works if potentially contaminated land is encountered during construction works (including

Policy reference	Policy description	Compliance commentary
		groundwater), while further investigation is carried out in order to reduce the potential for contamination to be spread further before its extent and severity is identified, and appropriate remediation is agreed. Taking into account that the embedded mitigation and the additional mitigation measures are implemented as indicated in Sections 11, 12, 14 and 15 of the Phase 1 Preliminary Risk Assessment (PRA) (**Appendix 14-C: Phase 1 Preliminary Risk Assessment** of the ES **[EN010154/APP/6.3]**), and as summarised in the **Framework CEMP [EN010154/APP/7.7]**, no likely significant effects are anticipated. In summary, impacts of the Proposed Development on ground conditions can be appropriately controlled to acceptable standards and further investigation will be undertaken if required to understand potential areas of contamination.
Policy S57: The Historic Environment	Development proposals should protect, conserve and seek opportunities to enhance the historic environment of Central Lincolnshire. In instances where a development proposal would affect the significance of a heritage asset (whether designated or non-designated), including any contribution made by its setting, the applicant will be required to undertake and provide the following, in a manner proportionate to the asset's significance:	A description of the significance of the relevant heritage assets is set out in **Table 7-9: Summary of sensitive heritage receptors and their value** of **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]** and accompanying appendices including **Appendix 7-B: Cultural Heritage Desk-Based Assessment**. There are no Scheduled Monuments, Listed Buildings, Conservation Areas, or other designated heritage

Policy reference	Policy description	Compliance commentary
	a. describe and assess the significance of the asset, including its setting, to determine its architectural, historical or archaeological interest; and b. identify the impact of the proposed works on the significance and special character of the asset, including its setting; and c. provide a clear justification for the works, especially if these would harm the significance of the asset, including its setting, so that the harm can be weighed against public benefits. Development proposals will be supported where they: a. protect the significance of heritage assets (including where relevant their setting) by protecting and enhancing architectural and historic character, historical associations, landscape and townscape features and through consideration of scale, design, architectural detailing, materials, siting, layout, mass, use, and views and vistas both from and towards the asset; b. promote opportunities to better reveal significance of heritage assets, where possible; c. take into account the desirability of sustaining and enhancing non-designated heritage assets and their setting.	assets, including World Heritage Sites, Registered Parks and Gardens or Registered Battlefields, located within the Order Limits as reported in **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]**. The impact of the Proposed Development upon heritage assets has been a key consideration in the design evolution of the Proposed Development as demonstrated with the focussed Design Principle on the historic environment, as set out in Section 3.8 of the **Design Approach Document [EN010154/APP/7.3]**. **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]** presents the assessment findings of the likely significant effects on cultural heritage as a result of the Proposed Development. In terms of impacts to archaeology and designated heritage assets (Listed buildings and conservation areas), historic buildings and historic landscape elements, the assessment of the Proposed Development has concluded that there would be no adverse effects. A full appraisal of the Proposed Development against planning policy is provided in Section 6 of the **Planning Statement [EN010154/APP/7.2]**. In summary, the mitigation measures built into the Proposed Development minimise the changes to

Policy reference	Policy description	Compliance commentary
	Development proposals that will result in substantial harm to, or the total loss of, a designated heritage asset will only be granted permission where it is necessary to achieve substantial public benefits that outweigh the harm or loss, and the following criteria can be satisfied: 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. Where a development proposal would result in less than substantial harm to a designated heritage asset, permission will only be granted where the public benefits, including, where appropriate, securing its optimum viable use, outweigh the harm. Where a non-designated heritage asset is affected by development proposals, there will be a presumption in favour of its retention, though regard will be had to the scale of any harm or loss and the significance of the heritage asset. Any special features which contribute to an	surrounding designated and built heritage assets and the historic landscape resource. It is acknowledged however that the Proposed Development would lead to less than substantial harm (at the lower end of the scale) to two designated heritage assets and one non-designated heritage asset. However, it should be noted that the effects would be both temporary and reversible, albeit long term. The harm identified to designated and non-designated heritage assets, is clearly outweighed by the substantial public benefits that would arise from the provision of low carbon energy to meet the need identified in the NPSs. With regards to impacts on Archaeology, **Chapter 7: Cultural Heritage** of the ES [**EN010154/APP/6.1**], concludes that there are no significant adverse effects anticipated in relation to archaeological assets, with a WSI to be secured through Requirement 11 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. Trial trenching has also been undertaken across the Principal Site, as stated in **Appendix 7-I: Trial Trenching Report (Interim)** of the ES **[EN010154/APP/6.3]**, to date, a number of distinct clusters of archaeological remains can be identified. Across the majority of the trenching areas investigated to date, relatively thin topsoil cover was observed in many of the fields, leading to relatively poor

Policy reference	Policy description	Compliance commentary
	asset's significance should be retained and reinstated, where possible. **Listed Buildings** Development proposals that affect the setting of a Listed Building will, in principle, be supported where they make a positive contribution to, or better reveal the significance of the Listed Building. **Conservation Areas** Significant weight will be given to the protection and enhancement of Conservation Areas. Development within, affecting the setting of, or affecting views into or out of, a Conservation Area should conserve, or where appropriate enhance, features that contribute positively to the area's special character, appearance and setting, including as identified in any adopted Conservation Area appraisal. Proposals should: a. retain buildings/groups of buildings, existing street patterns, historic building lines and ground surfaces and architectural details that contribute to the character and appearance of the area; b. where relevant and practical, remove features which have a negative impact on the character and appearance of the Conservation Area;	preservation levels of some of the features, particularly furrows. However, despite extensive evidence for relatively shallow features which were likely affected by ploughing, the topsoil was relatively sterile and did not produce many unstratified finds. This may suggest that the features were not particularly finds rich and that plough truncation, while damaging to the cut features themselves, has not disturbed stratified finds on any great scale.

Policy reference	Policy description	Compliance commentary
	c. retain and reinforce local distinctiveness with reference to height, massing, scale, form, materials and plot widths of the existing built environment; d. assess, and mitigate against, any negative impact the proposal might have on the townscape, roofscape, skyline and landscape; and e. aim to protect trees, or where losses are proposed, demonstrate how such losses are appropriately mitigated against. **Archaeology** Development affecting archaeological remains, whether known or potential, designated or undesignated, should take every practical and reasonable step to protect and, where possible, enhance their significance. Planning applications for such development should be accompanied by an appropriate and proportionate assessment to understand the potential for and significance of remains, and the impact of development upon them. If initial assessment does not provide sufficient information, developers will be required to undertake field evaluation in advance of determination of the application. This may include a range of techniques for both intrusive and non-intrusive evaluation, as appropriate to the site.	

Policy reference	Policy description	Compliance commentary
	Wherever possible and appropriate, mitigation strategies should ensure the preservation of archaeological remains in-situ. Where this is either not possible or not desirable, provision must be made for preservation by record according to an agreed written scheme of investigation submitted by the developer and approved by the planning authority. Any work undertaken as part of the planning process must be appropriately archived in a way agreed with the local planning authority.	
Policy S58: Protecting Lincoln, Gainsborough and Sleaford's Setting and Character	All development proposals should contribute to the realisation of the following key principles: Lincoln a. Protect the dominance and approach views of Lincoln Cathedral, Lincoln Castle and uphill Lincoln on the skyline; b. Protect Lincoln's distinct built heritage and townscape character as set out in the Lincoln Townscape Character Assessment; c. Respect Lincoln's unique character and setting and relationship with surrounding villages by maintaining and enhancing a strategic green infrastructure network around and into the City, including Green Wedges (see Policy S63) to protect the City's green character and to maintain the setting and integrity of surrounding villages;	The impact of the Proposed Development upon heritage assets has been a key consideration in the design evolution of the Proposed Development as demonstrated with the focussed Design Principle on the historic environment, as set out in Section 3.8 of the **Design Approach Document [EN010154/APP/7.3]** which requires the Proposed Development to *"be sensitive to heritage assets, providing suitable offsets, and including protecting views to Lincolnshire Cathedral".* Accordingly, the design of the Proposed Development has considered protecting heritage assets at each step of the design process. As noted in **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** the solar PV panels and associated infrastructure have been sited

Policy reference	Policy description	Compliance commentary
	d. Proposals within, adjoining or affecting the setting of the 11 Conservation Areas and 3 historic parks and gardens within the built up area of Lincoln, should preserve and enhance their special character, setting, appearance and respect their special historic and architectural context; e. Support the development of art, cultural and leisure assets and facilities, such as the Collection, the Theatre Royal, the Engine Shed, Arboretum and Whisby Nature Park, and improve access to such assets and facilities; and f. Do not detract from the open character of Lincoln's Brayford Pool and waterways, protecting and enhancing them as a major focal points in and through the City.	to preserve, as far as possible, views towards Lincoln Cathedral available from Tunman Hill. **Chapter 7: Cultural Heritage** of the **ES [EN010154/APP/6.1]** sets out in section 7.6 how embedded mitigation measures have sought to protect the special character and setting of the Conservation Areas and the Registered Historic Park and Garden, impacted by the Proposed Development. These measures include siting elements of the Proposed Development to minimise potential changes to the setting of the assets; and the retention of existing and planting of new vegetation to screen elements of the Proposed Development. Additional measures to ensure effects on designated historic assets are avoided or minimised during construction and decommissioning are set out within the **Framework CEMP [EN010154/APP/7.7]**, **Framework CTMP [EN010154/APP/7.18]** and **Framework DEMP [EN010154/APP/7.9],** which are to be secured via requirements 12, 14, and 20 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. **Chapter 7: Cultural Heritage** of the **ES [EN010154/APP/6.1]** sets out that there will be no residual significant effects to heritage assets, following

Policy reference	Policy description	Compliance commentary
		the implementation of embedded and additional mitigation measures and considered based on the worst-case scenario. This includes measures to minimise changes to the historic landscape resources and built heritage assets. The special character of Whisby Nature Park as a Local Nature Reserve (LNR) and hence valuable asset to the local area, is not directly impacted by the Proposed Development as detailed within **Table 8-13: Summary of embedded avoidance and mitigation measures** within **Chapter 8: Ecology and Nature Conservation** of the **ES [EN010154/APP/6.1]**. It has been assessed through a detailed settings assessment that the proposed change within the setting of Lincoln Cathedral would not affect its value (heritage significance) due to lack of relevant associations, intervisibility, or as a result of the embedded mitigation measures (Section 7.6 of **Chapter 7: Cultural Heritage** of the **ES [EN010154/APP/6.1]**).
Policy S59: Green and Blue Infrastructure Network	The Central Lincolnshire Authorities will safeguard green and blue infrastructure in Central Lincolnshire from inappropriate development and work actively with partners to maintain and improve the quantity, quality, accessibility and management of the green infrastructure network.	The impact of the Proposed Development upon green infrastructure has been a key consideration in the design evolution of the Proposed Development as demonstrated with the focussed Design Principle on biodiversity (Principle 9), as set out in Section 3.8 of

Policy reference	Policy description	Compliance commentary
	Proposals that cause loss or harm to the green and blue infrastructure network will not be supported unless the need for and benefits of the development demonstrably outweigh any adverse impacts. Where adverse impacts on green infrastructure are unavoidable, development will only be supported if suitable mitigation measures for the network are provided. Development proposals should ensure that existing and new green and blue infrastructure is considered and integrated into the scheme design from the outset. Where new green infrastructure is proposed, the design and layout should take opportunities to: a. incorporate a range of types and sizes of green and blue spaces, green routes and environmental features that are appropriate to the development and the wider green and blue infrastructure network to maximise the delivery of multi-functionality; b. deliver biodiversity net gain and support ecosystem services; c. respond to landscape/townscape and historic character; d. support climate change adaptation and resilience including through use of appropriate habitats and species; and e. encourage healthy and active lifestyles.	the **Design Approach Document [EN010154/APP/7.3]** which requires the Proposed Development to '*seek to avoid adverse impacts and to enhance existing biodiversity through the creation of new green infrastructure and the creation of new habitat for wildlife to achieve a minimum 10% in Biodiversity Net Gain'*. This Principle has been incorporated into the design through habitat creation, management, and monitoring. Details of this are set out in the **Framework LEMP [EN010154/APP/7.15], from** which a detailed version will be produced and secured via Requirement 8 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**, to ensure mitigation and enhancement measures are delivered successfully. A summary of ecological enhancement is provided at Section 5.3 of the **Planning Statement [EN010154/APP/7.2]** and includes woodland planting, natural regeneration of hedgerows, pond restoration and a range of artificial bird and bat boxes. **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** concludes that the Proposed Development has the potential to generate beneficial effects for a range of important ecological features occurring in both aquatic and terrestrial habitats. This

Policy reference	Policy description	Compliance commentary
	Development proposals must protect the linear features of the green and blue infrastructure network that provide connectivity between green infrastructure assets, including public rights of way, bridleways, cycleways and waterways, and take opportunities to improve and expand such features. Development will be expected to make a contribution proportionate to their scale towards the establishment, enhancement and on-going management of green and/or blue infrastructure by contributing to the development of the strategic green infrastructure network within Central Lincolnshire, in accordance with the Developer Contributions SPD.	includes the cessation of farming practices including agricultural chemical inputs to watercourses and pesticide use on crops as well as the extensive creation of grassland habitats and positive management existing boundary features. **Chapter 8 Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** also sets out the additional mitigation and enhancement measures including the following: a. Woodland planting which provides ecological value through forming important wildlife corridors between existing woodlands; b. The natural regeneration of hedgerows to encourage a broad mosaic of successional habitats forming broad habitat corridors throughout the Proposed Development; c. Scrub to provide shelter and food resources for birds and other wildlife, enhancing biodiversity; d. Natural regeneration areas to further increase biodiversity and provide an opportunity to observe the gradual

Policy reference	Policy description	Compliance commentary
		structural transition from grassland canopy to woodland habitats; e. Species-rich grassland and arable field margins to increase biodiversity, enhancing value for wildlife such as providing food resource; f. Pond restoration and planting around ponds to maximise wildlife value; g. A range of bird and bat boxes will be installed to increase the availability of nesting and roosting features, enhancing the value of habitats for species; and h. Creation of habitat piles to provide refuge and hibernation opportunities for amphibians and reptiles as well as dead wood habitat for invertebrates, which ultimately benefit fauna like bats and birds. The **Framework LEMP [EN010154/APP/7.15]** sets out the measures for delivering landscape and ecological enhancements. A detailed LEMP will be secured under Requirement 8 of Schedule 2 the **Draft Development Consent Order [EN010154/APP/3.1]**.

Policy reference	Policy description	Compliance commentary
		The **Framework LEMP [EN010154/APP/7.15]** includes the landscaping and monitoring measures. Vegetation would be established through natural regeneration or in the case of grasslands from seed collection from the grasslands identified within the Order Limits and through a suitable long-term habitat management regime. Consideration will be paid to microclimatic conditions when identifying appropriate species. Management will be undertaken in a variety of ways to ensure maximum biodiversity gains, with grassland managed by either low intensity grazing or infrequent mowing or hay cutting to allow plant species to flower and seed. The Proposed Development is committed to delivering a net gain in biodiversity in accordance with Requirement 8 (2) of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]** and as set out in the **Biodiversity Net Gain Report [EN010154/APP/7.12]**. The Proposed Development is predicted to result in a net gain of 30% for area-based habitat units, 50% for hedgerow units, and 10% for watercourse units. The report demonstrates the Proposed Development has the potential to deliver a significant BNG on Site, which is significantly higher than the Government's target for 10% BNG as set out in the Environment Act 2021.

Policy reference	Policy description	Compliance commentary
		The Principal Site has been designed to fit within the network of PRoW and existing permissive paths to further enhance the local connectivity. The provision and management of permissive paths is detailed within the **Framework PRoW-MP [EN010154/APP/7.14]** and is to be secured by Requirement 18 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Policy S60: Protecting and Biodiversity and Geodiversity	All development should: a. protect, manage, enhance and extend the ecological network of habitats, species and sites of international, national and local importance (statutory and non-statutory), including sites that meet the criteria for selection as a Local Site; b. minimise impacts on biodiversity and features of geodiversity value; c. deliver measurable and proportionate net gains in biodiversity in accordance with Policy S61; and d. protect and enhance the aquatic environment within or adjoining the site, including water quality and habitat. **Part One: Designated Sites** The following hierarchy of sites will apply in the consideration of development proposals:	**Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** presents the findings of an assessment of the potential significant effects of the construction, operational (including maintenance), and decommissioning phases of the Proposed Development on ecology and nature conservation (collectively referred to as biodiversity). The assessment is based upon the maximum parameters of design for the Proposed Development and the design information (see **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]**). **Part one:** **1. International Sites-** A **Habitats Regulation Assessment No Significant Effects Report [EN010154/APP/7.13]** has been submitted. The report concludes that there will be no

Policy reference	Policy description	Compliance commentary
	1. International Sites The highest level of protection will be afforded to internationally protected sites. Development proposals that will have an adverse impact on the integrity of such areas, will not be supported other than in exceptional circumstances, in accordance with the NPPF. Development proposals that are likely to result in a significant adverse effect, either alone or in combination with other proposals, on any internationally designated site, must satisfy the requirements of the Habitats Regulations (or any superseding similar UK legislation). Development requiring Appropriate Assessment will only be allowed where it can be determined, taking into account mitigation, that the proposal would not result in significant adverse effects on the site's integrity. **2. National Sites** (NNRs and SSSIs) Development proposals should avoid impact on these nationally protected sites. Development proposals within or outside a national site, likely to have an adverse effect, either individually or in combination with other developments, will not normally be supported unless the benefits of the development, at this site, clearly outweigh both the adverse impacts on the features of the site and any adverse impacts on the wider network of nationally protected sites.	significant effects to any European site or sites either from the construction, operation and maintenance and decommissioning of the Proposed Development or in combination with other plans and projects. **2. National Sites** The Proposed Development is not located within or an outside an SSSI. **3. Irreplaceable Habitat** There is no ancient woodland within the Order Limits although Tunman Wood, to the east of Morton, is located adjacent to the boundary. **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** sets out that veteran and ancient trees were recorded within the Order Limits and will be retained and protected with suitable buffers as presented in the **Works Plans [EN010154/APP/2.2]**. **4. Local Sites** The Proposed Development is not located within any Local Wildlife Sites. **Part two:** Opportunities to conserve and enhance biodiversity are demonstrated throughout **Chapter 8: Ecology**

Policy reference	Policy description	Compliance commentary
	3. Irreplaceable Habitats Planning permission will be refused for development resulting in the loss, deterioration or fragmentation of irreplaceable habitats, including ancient woodland and aged or veteran trees, unless there are wholly exceptional reasons and a suitable compensation strategy will be delivered. **4. Local Sites** (LNR, LWS and LGS) Development likely to have an adverse effect on locally designated sites, their features or their function as part of the ecological network, will only be supported where the benefits of the development clearly outweigh the loss, and the coherence of the local ecological network is maintained. Where significant harm cannot be avoided, the mitigation hierarchy should be followed. **Part Two: Species and Habitats of Principal Importance** All development proposals will be considered in the context of the relevant Local Authority's duty to promote the protection and recovery of priority species and habitats. Development should seek to preserve, restore and re-create priority habitats, ecological networks and the protection and recovery of priority species set out in the	**and Nature Conservation** of the ES **[EN010154/APP/6.1]** which describes how biodiversity has been integral to the design and layout of the Proposed Development. The iterative design process in relation to biodiversity, focussed on Design Principle 4 outlined in Section 3.8 of the **Design Approach Document [EN010154/APP/7.3]** which states that the Proposed Development will "*recognise the potential impact on protected species and habitat features*. *It will safeguard these through the use of buffers, offsets and construction measures to minimise impacts".* It has enabled the Proposed Development to protect species and avoid direct or indirect impacts to habitats. The assessment within **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** included a comprehensive desk study and field survey data that informed species-specific assessments to identify priority habitats and presence of any protected and notable species. In summary, **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** assesses there to be no significant adverse effects have been identified during construction, operation or decommissioning of the Proposed Development. **Part three:**

Policy reference	Policy description	Compliance commentary
	Natural Environment and Rural Communities Act 2006, Lincolnshire Biodiversity Action Plan, Lincolnshire Geodiversity Strategy and Local Nature Recovery Strategy. Where adverse impacts are likely, development will only be supported where the need for and benefits of the development clearly outweigh these impacts. In such cases, appropriate mitigation or compensatory measures will be required. **Part Three: Mitigation of Potential Adverse Impacts** Development should avoid adverse impact on existing biodiversity and geodiversity features as a first principle, in line with the mitigation hierarchy. Where adverse impacts are unavoidable they must be adequately and proportionately mitigated. If full mitigation cannot be provided, compensation will be required as a last resort where there is no alternative. Development will only be supported where the proposed measures for mitigation and/or compensation along with details of net gain are acceptable to the Local Planning Authority in terms of design and location, and are secured for the lifetime of the development with appropriate funding mechanisms that are capable of being secured by condition and/or legal agreement. If significant harm to biodiversity resulting from development cannot be avoided, adequately mitigated, or,	The mitigation hierarchy has been followed, and appropriate mitigation implemented. The design of the Proposed Development seeks to protect species and habitat features through the use of buffers and offsets, hereby avoiding any direct impact. Buffers and offsets are included as a design commitment in **Appendix A: Design Commitments** of the **Design Approach Document [EN010154/APP/7.3]** and will be secured by Requirement 6 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. The Proposed Development also includes bird mitigation comprising 64 ha of permanent grassland and 181 ha of retained arable land for Skylark and Lapwing, as presented in **Figure 8-5: Bird Mitigation Land Allocation** of the ES **[EN010154/APP/6.2]** and secured in the **Framework LEMP [EN010154/APP/7.15]**. As set out in **the BNG Report [EN010154/APP/7.12],** the Applicant has committed to deliver a minimum of 30% BNG in habitat units, 50% BNG in hedgerow units and 10% BNG in watercourse units. This is secured by Requirement 8 at Schedule 2 to the **Draft Development Consent Order [EN010154/APP/3.1]**.

Policy reference	Policy description	Compliance commentary
	as a last resort, compensated for, then planning permission will be refused.	
Policy S61: Biodiversity Opportunity and Delivering Measurable Net Gains	Following application of the mitigation hierarchy, all development proposals should ensure opportunities are taken to retain, protect and enhance biodiversity and geodiversity features proportionate to their scale, through site layout, design of new buildings and proposals for existing buildings with consideration to the construction phase and ongoing site management. Development proposals should create new habitats, and links between habitats, in line with Central Lincolnshire Biodiversity Opportunity and Green Infrastructure Mapping evidence, the biodiversity opportunity area principles set out in Appendix 4 to this Plan and the Local Nature Recovery Strategy (once completed), to maintain and enhance a network of wildlife sites and corridors, to minimise habitat fragmentation and provide opportunities for species to respond and adapt to climate change. Proposals for major and large scale development should seek to deliver wider environmental net gains where feasible. **Biodiversity Net Gain**	The mitigation hierarchy has been followed, taking into consideration the principles of avoidance, mitigation, compensation and enhancement and appropriate mitigation implemented. Embedded avoidance and mitigation measures are presented in Section 8.10 of **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]**. A summary of these measures is included below: a. There are no routes for construction traffic that pass within 200m of the Swanholme Lakes SSSI, thus avoiding any potential degradation to sensitive habitats from vehicle pollutants. b. The Proposed Development has been designed to ensure that the River Witham is crossed using trenchless methods (e.g. Horizontal Directional Drilling (HDD)). c. The Proposed Development has to unavoidably cross this LWS to facilitate the Cable Corridor. Laying of cabling will be required within this LWS, along a working area of approximately 30m. However, the Proposed Development

Policy reference	Policy description	Compliance commentary
	The following part of the policy applies unless, and until, subsequently superseded, in whole or part, by national regulations or Government policy associated with the delivery of mandatory biodiversity net gain arising from the Environment Act 2021. Where conflict between the policy below and the provisions of Government regulations or national policy arises, then the latter should prevail. All qualifying development proposals must deliver at least a 10% measurable biodiversity net gain attributable to the development. The net gain for biodiversity should be calculated using Natural England's Biodiversity Metric. Biodiversity net gain should be provided on-site wherever possible. Off-site measures will only be considered where it can be demonstrated that, after following the mitigation hierarchy, all reasonable opportunities to achieve measurable net gains on-site have been exhausted or where greater gains can be delivered off-site where the improvements can be demonstrated to be deliverable and are consistent with the Local Nature Recovery Strategy. All development proposals, unless specifically exempted by Government, must provide clear and robust evidence for biodiversity net gains and losses in the form of a biodiversity gain plan, which should ideally be submitted with the planning application (or, if not, the submission and approval of a biodiversity gain plan before development commences will form a condition of any planning application approval), setting out:	has been designed to minimise impacts on this LWS as much as is practicable, as shown on the **Works Plans [EN010154/APP/2.2]**. The **Framework CEMP [EN010154/APP/7.7]** outlines the standard embedded good practice measures that will be implemented during construction of the Proposed Development, such as dust suppression and pollution prevention. d. The Proposed Development has been designed to retain and avoid development within these arable fields where feasible. Further mitigation measures are set out in Section 8.10 of **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]**. Habitat creation, management and monitoring details are set out in the **Framework LEMP [EN010154/APP/7.15],** which will be secured via Requirement 8 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**, to ensure mitigation and enhancement measures are delivered successfully.

Policy reference	Policy description	Compliance commentary
	a. information about the steps to be taken to minimise the adverse effect of the development on the biodiversity of the onsite habitat and any other habitat; b. the pre-development biodiversity value of the onsite habitat; c. the post-development biodiversity value of the onsite habitat following implementation of the proposed ecological enhancements/interventions; d. the ongoing management strategy for any proposals; e. any registered off-site gain allocated to the development and the biodiversity value of that gain in relation to the development; and f. exceptionally any biodiversity credits purchased for the development through a recognised and deliverable offsetting scheme. Demonstrating the value of the habitat (pre and post-development) with appropriate and robust evidence will be the responsibility of the applicant. Proposals which do not demonstrate that the post-development biodiversity value will exceed the pre-development value of the onsite habitat by a 10% net gain will be refused. Ongoing management of any new or improved onsite and offsite habitats, together with monitoring and reporting, will	As set out in **the BNG Report [EN010154/APP/7.12]**, the Applicant has committed to deliver a minimum of 30% BNG in habitat units, 50% BNG in hedgerow units and 10% BNG in watercourse units. This will be secured by Requirement 8 at Schedule 2 to the **Draft Development Consent Order [EN010154/APP/3.1]**.

Policy reference	Policy description	Compliance commentary
	need to be planned and funded for 30 years after completion of a development.	
Policy 62: Area of Outstanding Natural Beauty and Areas of Great Landscape Value	**Areas of Great Landscape Value** Areas of Great Landscape Value (AGLV) are locally designated landscape areas recognised for their intrinsic character and beauty and their natural, historic and cultural importance. A high level of protection will be afforded to AGLV reflecting their locally important high scenic quality, special landscape features and sensitivity. Development proposals within, or within the setting of, AGLV shall: a. conserve and enhance the qualities, character and distinctiveness of locally important landscapes; and b. protect, and where possible enhance, specific landscape, wildlife and historic features which contribute to local character and landscape quality; and c. maintain landscape quality and minimise adverse visual impacts through high quality building and landscape design; and d. demonstrate how proposals have responded positively to the landscape character in relation to siting, design, scale and massing and where appropriate have retained or enhanced important	**Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** presents the findings of an assessment of the likely significant effects of the Proposed Development upon the landscape character and visual amenity. As concluded in **Chapter 10 Landscape and Visual Impact Assessment** of the ES **[EN010154/APP/6.1]**, there will be an adverse impact on the surrounding landscape and visual impact caused by the Proposed Development during the operational phase and there will be long-term moderate to major adverse effects on landscape character and visual amenity. In most instances, these impacts can be adequately mitigated but, in some instances, there will be residual adverse impacts resulting in harm which needs to be weighed in the planning balance. This harm is tempered by other instances where current landscape and visual impacts are improved such as hedgerow gapping up, strengthening field boundaries and biodiversity improvements. This should be read alongside **Appendix 10-E: Landscape Assessment** of the ES **[EN010154/APP/6.3]** and **Appendix 10-F: Visual Assessment** of the ES **[EN010154/APP/6.3]**. Consideration of the landscape and visual effects for

Policy reference	Policy description	Compliance commentary
	views, and natural, historic and cultural features of the landscape; and i. where appropriate, restore positive landscape character and quality. Where a proposal may result in adverse impacts, it may exceptionally be supported if the overriding benefits of the development demonstrably outweigh the harm – in such circumstances the harm should be minimised and mitigated through design and landscaping	the Proposed Development started at the site selection stage, described in full in **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]**. There is a designation for an Area of Great Landscape Value (AGLV), the Lincoln Cliff Area of Great Landscape Value, which runs from Lincoln to Leadenham, passing through the Cable Corridor around Coleby and Boothby Graffoe. Section 4.2 of **Appendix 10-E: Landscape Assessment** of the ES **[EN010154/APP/6.3]** and **Appendix 10-F: Visual Assessment** of the ES **[EN010154/APP/6.3]** states The Waddington to Bracebridge Heath Green Wedge and Lincoln Cliff Area of Great Landscape Value were excluded in order to help minimise the landscape impacts of the Proposed Development. The Principal Site of the Proposed Development is not located in the AGLV (although it does intersect the Cable Corridor, but the cable is buried and not visible). The Proposed Development has been designed in such a way that the Cable Corridor will be buried below ground and has been sited alongside existing large-scale pylons, which are themselves detracting features in the landscape, to avoid affecting new areas within the sensitive landscape character of Lincoln Cliff. Impacts on the landscape character of the Lincoln Cliff Area of Great Landscape Value have been assessed

Policy reference	Policy description	Compliance commentary
		at Section 10.7 of **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]**, as part of the Lincoln Cliff landscape character areas. During operation, with the Cable Corridor below ground, there would be no perception of the equipment, with any area of vegetation removal or localised alteration to vegetation patterns not impacting the character of the area. Any perception of the Principal Site would not alter the character, due to distance and intervening features. Therefore, there would be no change to the character. Effects during construction would be short-term and temporary. **Chapter 7: Cultural Heritage** of the **ES [EN010154/APP/6.1]** presents the approach and findings of the assessment of potential impacts and likely significant effects arising from the Proposed Development on cultural heritage, during the construction, operation (including maintenance), and decommissioning stages. In terms of impacts to archaeology and designated heritage assets, historic buildings and historic landscape elements, the assessment of the Proposed Development has concluded that there would be no adverse effects.
Policy S66: Trees, Woodland and Hedgerows	Development proposals should be prepared based on the overriding principle that:	Measures included in the **Framework Landscape and Ecology Management Plan [EN010154/APP/7.15]** include the retention of existing

Policy reference	Policy description	Compliance commentary
	a. the existing tree and woodland cover is maintained, improved and expanded; and b. opportunities for expanding woodland are actively considered, and implemented where practical and appropriate to do so. **Existing Trees and Woodland** Planning permission will only be granted if the proposal provides evidence that it has been subject to adequate consideration of the impact of the development on any existing trees and woodland found on-site (and off-site, if there are any trees near the site, with 'near' defined as the distance comprising 12 times the stem diameter of the off-site tree). If any trees exist on or near the development site, 'adequate consideration' is likely to mean the completion of a British Standard 5837 Tree Survey and, if applicable, an Arboricultural Method Statement. Where the proposal will result in the loss or deterioration of: a. ancient woodland; and/or b. the loss of aged or veteran trees found outside ancient woodland,	habitats including individual trees, shrubs and woodland, hedgerows, arable land, and ponds. The retention of these will maintain visual amenity, reinforce the character of the landscape, provide a structure for the addition of new planting, provide land for bird mitigation, and enhance the biodiversity value of aquatic species. A range of new habitats are proposed including woodland and tree belts, hedgerows with trees, scrub, individual trees, various forms of grassland, community orchard, localised features, and arable flora. These measures will provide biodiversity enhancements providing value to wildlife, screen sensitive areas and supplement existing retained features. The **Framework LEMP [EN010154/APP/7.15]** is to be secured in detail under Requirement 8 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. As set out in the **Design Approach Document [EN010154/APP/7.3]**, the landscape design has sought to integrate the Proposed Development into its surrounding landscape by utilising existing features and avoiding or minimising adverse landscape and visual effects as much as possible. This is evident in the retained hedgerows, trees and woodland, arable fields and ponds and the proposed hedgerows, woodlands and tree belts, grassland and community

Policy reference	Policy description	Compliance commentary
	permission will be refused, unless and on an exceptional basis the need for, and benefits of, the development in that location clearly outweigh the loss. Where the proposal will result in the loss or deterioration of a tree protected by a Tree Preservation Order or a tree within a Conservation Area, then permission will be refused unless: a. there is no net loss of amenity value which arises as a result of the development; or c. the need for, and benefits of, the development in that location clearly outweigh the loss. Where the proposal will result in the loss of any other tree or woodland not covered by the above, then the Council will expect the proposal to retain those trees that make a significant contribution to the landscape or biodiversity value of the area, provided this can be done without compromising the achievement of good design for the site. **Mitigating for loss of Trees and Woodland** Where it is appropriate for higher value tree(s) (category A or B trees (BS5837)) and/or woodland to be lost as part of a development proposal, then appropriate mitigation, via compensatory tree planting, will be required. Such tree planting should be on-site wherever possible and should:	orchards located at the site boundary and throughout the DCO Site itself. There is no ancient woodland within the Order Limits although Tunman Wood, to the east of Morton, is located adjacent to the boundary. **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** sets out that veteran and ancient trees were recorded within the Order Limits and will be retained and protected with suitable buffers as presented in the **Works Plans [EN010154/APP/2.2]**. An **Arboricultural Impact Assessment (AIA)** is provided at **Appendix 10-H: Arboricultural Impact Assessment** of the ES **[EN010154/APP/6.3].** The AIA considers the likely direct and indirect arboricultural impacts of the Proposed Development on trees within or immediately adjacent to the Order Limits, along with suitable mitigation measures. As set out in the conclusion of the assessment, the impacts of tree removals will be compensated by the proposed tree planting and associated landscaping works as detailed in the **Framework LEMP [EN010154/APP/7.15]**. No veteran or ancient trees or ancient woodland are to be removed, nor are any trees subject to Tree Preservation Order or within a

Policy reference	Policy description	Compliance commentary
	take all opportunities to meet the six Tree Planting Principles (see supporting text); and unless demonstrably impractical or inappropriate, provide the following specific quantity of compensatory trees:	Conservation Area are to be removed (based on TPO and CA information available at the time of writing).

Trunk Diameter(mm) at 1.5m above ground of tree lost to development	Number of replacement trees required, per tree lost*
75-200	1
210-400	4
410-600	6
610-800	9
810-1000	10
1000+	11

*replacement based on selected standards 10/12cm girth at 1m

New Trees and Woodland

Where appropriate and practical, opportunities for new tree planting should be explored as part of all development proposals (in addition to, if applicable, any necessary compensatory tree provision). Where new trees are

Policy reference	Policy description	Compliance commentary
	proposed, they should be done so on the basis of the five Tree Planting Principles. Proposals which fail to provide practical opportunities for new tree planting will be refused. Planting schemes should include provision to replace any plant failures within five years after the date of planting. Planting of trees must be considered in the context of wider plans for nature recovery which seeks to increase biodiversity and green infrastructure generally, not simply planting of trees, and protecting / enhancing soils, particularly peat soils. Tree planting should only be carried out in appropriate locations that will not impact on existing ecology or opportunities to create alternative habitats that could deliver better enhancements for people and wildlife, including carbon storage. Where woodland habitat creation is appropriate, consideration should be given to the economic and ecological benefits that can be achieved through natural regeneration. Any tree planting should use native and local provenance tree species suitable for the location. **Management and Maintenance** In instances where new trees and/or woodlands are proposed, it may be necessary for the council to require appropriate developer contributions to be provided, to ensure provision is made for appropriate management and maintenance of the new trees and/or woodland.	

Policy reference	Policy description	Compliance commentary
	Hedgerows Proposals for new development will be expected to retain existing hedgerows where appropriate and integrate them fully into the design having regard to their management requirements. Proposals for new development will not be supported that would result in the loss of hedges of high landscape, heritage, amenity or biodiversity value unless the need for, and benefits of, the development clearly outweigh the loss and this loss can be clearly demonstrated to be unavoidable. Development requiring the loss of a hedgerow protected under The Hedgerow Regulations will only be supported where it would allow for a substantially improved overall approach to the design and landscaping of the development that would outweigh the loss of the hedgerow. Where any hedges are lost, suitable replacement planting or restoration of existing hedges, will be required within the site or the locality, including appropriate provision for maintenance and management.	
Policy S67: Best and Most Versatile Agricultural Land	Proposals should protect the best and most versatile agricultural land so as to protect opportunities for food production and the continuance of the agricultural economy.	The Proposed Development comprises infrastructure defined as being of critical national priority (CNP) and provides substantial benefits. These include the production of urgently needed low carbon renewable electricity which contributes to the government's net zero obligations and decarbonisation aims, the

Policy reference	Policy description	Compliance commentary
	With the exception of allocated sites, significant development resulting in the loss of the best and most versatile agricultural land will only be supported if: a. The need for the proposed development has been clearly established and there is insufficient lower grade land available at that settlement (unless development of such lower grade land would be inconsistent with other sustainability considerations); and b. The benefits and/or sustainability considerations outweigh the need to protect such land, when taking into account the economic and other benefits of the best and most versatile agricultural land; and c. The impacts of the proposal upon ongoing agricultural operations have been minimised through the use of appropriate design solutions; and d. Where feasible, once any development which is supported has ceased its useful life the land will be restored to its former use (this condition will be secured by planning condition where appropriate). Where proposals are for sites of 1 hectare or larger, which would result in the loss of best and most versatile agricultural land, an agricultural land classification report should be submitted, setting out the justification for such a loss and how criterion b has been met.	provision of ecological enhancements and permissive paths, and job creation and economic growth, as set out in Section 5 of the **Statement of Need [EN010154/APP/7.1]** and Section 5.3 of the **Planning Statement [EN010154/APP/7.2].** The Proposed Development has been designed to take into account sensitive receptors, such as positioning the above ground infrastructure to avoid BMV land as far as practicable. Further information on the design evolution of the Proposed Development is set out in **Chapter 4: Alternatives and Design Evolution** of the ES **[EN010154/APP/6.1]**. These measures have been incorporated in each stage of the design of the Proposed Development from site selection as detailed in **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]** to soil management as outlined in the **Framework Soil Management Plan [EN010154/APP/7.10].** The Framework Soil Management Plan is to be secured under Requirement 15 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. Best and most versatile agricultural land was considered in the site selection process. The Site Selection Report is set out **Appendix A: Site Selection Report** of the **Planning Statement**

Policy reference	Policy description	Compliance commentary
		[EN010154/APP/7.2] and explains the Applicant's approach to site selection. The identification of the site for the Proposed Development was driven by the availability of deliverable land and site suitability in accordance with the requirements of policy. Following a formal application to National Grid for a connection into the 400kV Overhead Line at Whisby, National Grid informed the Applicant that this point of connection was not available and instead the Applicant was offered and subsequently secured a point of connection at the proposed National Grid substation near Navenby. Having secured land with willing landowners, and in recognition of the need to consider reasonable alternatives, the Applicant sought to assess the site against other potential alternative sites to ensure it was the most suitable taking into account operational requirements, national and local planning policy and planning and environmental constraints. **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]** sets out the approach to assessing the suitability of the site for the Proposed Development and potential alternative sites against a range of planning, environmental and operational criteria for a generating station with capacity of more than 50MW. The site selection process was undertaken in five stages. Following identification of an area of search

Policy reference	Policy description	Compliance commentary
		(Stage 1), all planning and environmental constraints including best and most versatile agricultural land (grades 1, 2 and 3) were excluded in order to seek to identify a site with no constraints (Stage 2). Following identification of potential sites with all constraints excluded (Stage 3) and their evaluation (Stage 4), it was concluded that the search needed to be widened as it was not possible to identify an appropriate site within the parameters defined for Stages 1 to 4 (Stage 5). Alongside other criteria, grade 3 best and most versatile agricultural land was reintroduced back into the area of search. With constraints reintroduced, **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]** concludes that the location of the Proposed Development comprises the preferred site when compared with other potential alternative sites when taking into account planning and environmental constraints, including BMV agricultural land, and operational considerations. On the basis of the provisional mapping used in **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]**, the vast majority of land within the Proposed Development was shown to be Grade 3 agricultural land. Subsequent Agricultural Land Classification surveys have shown that there is no Grade 1 or 2 agricultural land within the Order Limits, as reported in **Appendix 12-B: Agricultural**

Policy reference	Policy description	Compliance commentary

Land Classification Report of the ES **[EN010154/APP6.3]**. Furthermore, it should be noted that a potential alternative site that was closer to the point of connection at the proposed National Grid substation near Navenby, known locally as The Heath, was discounted on the basis that it was comprised principally of Grade 2 BMV land.

Results of the detailed study of the agricultural land quality, can be found in **Appendix 12-B: Agricultural Land Classification Report** of the ES **[EN010154/APP/6.3]**. For the Principal Site, the ALC survey concluded the following agricultural land use classifications:

a. Subgrade 3a - 27.8%
b. Subgrade 3b - 68.9%
c. Non-agricultural land – 1.5%
d. 1.8 ha was inaccessible.

Therefore, the ALC survey concluded that land within the Principal Site is predominantly subgrade 3b (moderate quality agricultural land), although some BMV land of subgrade 3a (good quality agricultural land), and some non-agricultural land, is present. There were no areas of ALC Grade 1 or 2 identified within the Principal Site, (Grades 1 and 2 are highest

Policy reference	Policy description	Compliance commentary
		quality of BMV land). An ALC survey of the Cable Corridor has not been undertaken, but based on Natural England online mapping resource, it is located within predominantly Grade 3 ALC land, with a small area of Grade 4 land located to the west of Navenby. The Proposed Development allows for shared use of land, recognising the need to allow current farming practices to continue, as well as the critical national priority of solar generation. The Order Limits include areas of new grassland for bird mitigation and a significant portion of retained arable land (the Proposed Development commits to providing 181ha of retained arable land), which provides mitigation for ground nesting birds whilst also allowing current farming practices to continue. This retained arable land includes approximately 116ha of Subgrade 3a BMV land. **Chapter 12 Socio-Economics and Land Use** of the ES **[EN010154/APP/6.1]** sets out that while the development is operational the soil resource within the Principal Site would remain under a perennial grass cover, before being returned to its original use following decommissioning. Section 6.3 of **Chapter 12: Socio-Economic and Land Use** of the ES **[EN010154/APP/6.1]** sets out that it is estimated that construction activity will

Policy reference	Policy description	Compliance commentary
		contribute approximately £27.4 million to the national economy, of which approximately £12.3 million would likely be within the local area (see paragraph 12.7.16 of **Chapter 12: Socio-Economic and Land Use** of the ES **[EN010154/APP/6.1]** describes how this figure has been calculated based on the average GVA per construction worker in the East Midlands). During the operational phase, the Proposed Development will generate long-term jobs. The Applicant has estimated that to operate and maintain the Proposed Development there will be a gross number of four permanent jobs generated by the Proposed Development during the operational phase. It is noted that there is expected to be two visiting workers per week and additional staff occasionally when the solar infrastructure needs replacing or cleaning, totalling up to 20 staff per day. As stated in **Chapter 12: Socio-Economic and Land Use** of the ES **[EN010154/APP/6.1]**, it is expected that when the rent revenues from the land start, then there will be additional jobs created on their farms offsite as landowners diversify their land further with the underlying financial stability of the rental income.

Thorpe on the Hill Neighbourhood Plan

Policy reference	Policy description	Compliance commentary
Policy 3: Biodiversity	Development should minimise its impact on biodiversity and provide net gains in biodiversity where possible. The following measures to protect and enhance local biodiversity will be supported: a) the preservation of ecological networks, especially those between built-up areas; b) the protection of ancient trees or trees of arboricultural value; c) the preservation, restoration and re-creation of wildlife habitats, and the protection and recovery of priority species; and, d) the provision of a net gain in flora and fauna.	**Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** presents the findings of an assessment of the potential significant effects of the construction, operational (including maintenance), and decommissioning phases of the Proposed Development on ecology and nature conservation (collectively referred to as biodiversity). The assessment is based upon the maximum parameters of design for the Proposed Development and the design information (see **Chapter 3: The Proposed Development** of the ES **[EN010154/APP/6.1]**). With the embedded mitigation measures incorporated into the design of the Proposed Development, as set out in Section 8.10 of **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** the assessment concludes that the construction, operation and decommissioning of the Proposed Development are unlikely to result in any significant adverse effects on all important species habitats and designated sites. Opportunities to conserve and enhance biodiversity are demonstrated throughout **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** which describes

Policy reference	Policy description	Compliance commentary
		how biodiversity has been integral to the design and layout of the Proposed Development. The iterative design process in relation to biodiversity, focussed on Design Principle 4 which is outlined in Section 3.8 of the **Design Approach Document [EN010154/APP/7.3].** This states that the Proposed Development will "*recognise the potential impact on protected species and habitat features*. *It will safeguard these through the use of buffers and offsets".* This design principle has enabled the Proposed Development to minimise impacts on biodiversity and protected species and avoid direct or indirect impacts to habitats The Order Limits have been refined to exclude sensitive areas of ancient woodland, such as Stocking Wood, which is outside of the Order Limits. Tunman/Housham Woods (part of Tunman Wood Local Wildlife Site and also including Stocking Wood), are immediately adjacent to the Principal Site however no adverse effects are anticipated. The design of the Proposed Development also seeks to protect species and habitat features through the use of buffers and offsets and through the provision of undeveloped areas of at least 15m between woodlands, and appropriate buffers between ancient/veteran or ancient trees (based on tree root protection areas), thereby avoiding any direct impact. Buffers and offsets are included

Policy reference	Policy description	Compliance commentary
		in the Design Commitments at **Appendix A: Design Commitments** of the **Design Approach Document [EN010154/APP/7.3]** and will be secured by Requirement 6 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. The Proposed Development also makes provision for bird mitigation comprising 64ha of permanent grassland and 181ha of retained arable for Skylark and Lapwing, as presented in **Figure 8-5: Bird Mitigation Land Allocation** of the ES **[EN010154/APP/6.2]** and secured in the **Framework LEMP [EN010154/APP/7.15]**. This land will be utilised to provide an important contribution to the ecological networks, with habitat creation and enhancement to offset the impact of loss of arable farmland for breeding ground-nesting birds as well as provide extensive benefits for other important ecological features and wider biodiversity. In summary, **Chapter 8: Ecology and Nature Conservation** of the ES **[EN010154/APP/6.1]** assesses there to be no significant adverse effects as a result of the construction, operation or decommissioning of the Proposed Development. In terms of BNG, as detailed within the **BNG Report [EN010154/APP/7.12]**, based on the

Policy reference	Policy description	Compliance commentary
		illustrative design, the Proposed Development could achieve a net gain of 30% for area-based habitat units; 50% for hedgerow units; and 10% for watercourses. This will be managed through the **Framework LEMP [EN010154/APP/7.15]** and will be secured via Requirement 8 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
Policy 4: Green Spaces and Green Infrastructure	1. Development should protect public rights of way and the enhancement of public rights of way will be supported. 2.Where necessary to mitigate the impact of a development proposal, proportionate contributions will be sought to improve existing or deliver new green spaces or other green infrastructure. The delivery of new, or improvements to, green spaces or green infrastructure will be supported.	The Principal Site has been designed to fit within the network of PRoW and existing permissive paths to further enhance local connectivity through the provision of permissive paths and circular routes to be available for public use during the operation of the authorised development to improve accessibility. The Proposed Development will also create a number of new permissive paths across the Principal Site. The provision and management of permissive paths is detailed within the **Framework PRoW-MP [EN010154/APP/7.14]** and will be secured by Requirement 18 in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. The impact of the Proposed Development upon green infrastructure has been a key consideration in the design evolution of the Proposed Development. This is demonstrated by Design

Policy reference	Policy description	Compliance commentary
		Principle 9 which focusses on biodiversity and is set out in Section 3.8 of the **Design Approach Document [EN010154/APP/7.3].** The design principle requires the Proposed Development to '*seek to avoid adverse impacts and to enhance existing biodiversity through the creation of new green infrastructure and the creation of new habitat for wildlife to achieve a minimum 10% in Biodiversity Net Gain'*. As set out in **the BNG Report [EN010154/APP/7.12]**, the Applicant has committed to deliver a minimum of 30% BNG in habitat units, 50% BNG in hedgerow units and 10% BNG in watercourse units. This is to be provided through measures including woodland planting, natural regeneration of hedgerows and the provisions of species-rich grassland and arable field margins. The BNG will be secured under Requirement 8 at Schedule 2 to the **Draft Development Consent Order [EN010154/APP/3.1]**. Habitat creation, management and monitoring details are set out in the **Framework LEMP [EN010154/APP/7.15],** which will be secured via Requirement 8 in Schedule 2 of the **Draft Development Consent Order** [**EN010154/APP/3.1]**, to ensure mitigation and

Policy reference	Policy description	Compliance commentary
		enhancement measures are delivered successfully.
Policy 5: Landscape and Views	Development outside the village curtilage should not reduce the separate identity of Thorpe on the Hill by reducing the existing gap between the village curtilage and the A46; and must respect the unique layout and pattern of the enclosure landscape of Thorpe on the Hill, as well as field boundaries such as hedges and trees. Development must also take account of the important views identified on Map 5. The preservation and enhancement of these views will be supported.	**Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** presents the findings of an assessment of the likely significant effects of the Proposed Development upon the landscape character and visual amenity. The extent of the LVIA Study Area is shown on **Figure 10-1: Landscape and Visual Impact Assessment Study Area** of the ES **[EN010154/APP/6.2]**, covering land between Morton in the north west, Thorpe on the Hill in the north east, Aubourn in the east and Norton Disney in the south west. A summary of these effects is presented in Section 6.3 of the **Planning Statement [EN010154/APP/7.2]**. The following visual receptors will experience residual moderate adverse effects during year 15 of operation of the Proposed Development: a. Recreational users of PRoW west of Thorpe on the Hill (TOTH/7/2, TOTH/21/1, TOTH/6/2, TOTH/6/3). Moderate adverse (significant) in summer. b. Recreational users of TOTH/11/1. Moderate adverse (significant) in winter.

Policy reference	Policy description	Compliance commentary

c. Recreational users of TOTH/12/3. Moderate adverse (significant) in winter and summer.

d. Recreational users of TOTH/15/1. Moderate adverse (significant) in winter.

The following visual receptors will experience residual major adverse effects during year 15 of operation of the Proposed Development:

a. Recreational users of PRoW west of Thorpe on the Hill (TOTH/7/2, TOTH/21/1, TOTH/6/2, TOTH/6/3). Major adverse (significant) in winter.

Chapter 10: Landscape and Visual Amenity of the ES **[EN010154/APP/6.1]** states the solar PV panels and associated infrastructure have been sited to preserve, as far as possible, cross valley views from Thorpe on the Hill. The Principal Site is mostly set back from settlement boundaries, such as fields immediately adjacent to Thorpe on the Hill. Where this has not been possible, offsets (typically measuring in excess of 100m) and new planting have been incorporated to retain a sense of openness whilst screening the solar PV panels. As per Section 10.7 of **Chapter 10: Landscape and Visual Amenity** of the ES

Policy reference	Policy description	Compliance commentary
		[EN010154/APP/6.1], during year 15 of operation of the Proposed Development, there would be a higher scenic quality from the vegetation being in leaf and increased opportunities for biodiversity for the Thorpe in the Hill Local Landscape Character Area. Effects experience during construction would be short term and temporary.

Bassingham Neighbourhood Plan

Policy reference	Policy description	Compliance commentary
HG4: Settlement Boundary	The Bassingham Settlement Boundary is defined in the Key Diagram. Development proposals outside the Settlement Boundary will be regarded as being in the countryside.	The Applicant notes that the Proposed Development is considered to be located within the countryside.
T1: Transport considerations in new development	Where it is appropriate and proportionate, planning applications should be accompanied by information which demonstrates how the following considerations have been addressed: • Provision of safe walking and cycling routes in the immediate area of the site with consideration given to the need to maintain and enhance walkable access to services and facilities in the village, and to the surrounding open countryside; • Opportunities to extend existing routes for walkers and cyclists, including routes linking into the surrounding countryside, as well as into the village, and to accommodate people of all ages and abilities, including those with pushchairs and wheelchairs; • How use of materials, provision of off road parking and shared services and traffic calming measures can encourage low vehicle speeds throughout the development; • How the proposals link with public transport; • Impacts of the traffic arising from the development; and	The Principal Site has been designed to fit within the network of PRoW and existing permissive paths to further enhance local connectivity. The Proposed Development will also create a number of new permissive paths across the Principal Site. The provision and management of permissive paths is detailed within the **Framework PRoW-MP [EN010154/APP/7.14]** and will be secured by Requirement 18 in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. **Chapter 13: Traffic and Transport** of the ES **[EN010154/APP/6.1]** assesses the impacts of the Proposed Development on traffic and transport including access. The chapter concludes that there are no residual significant effects of the Proposed Development on any of the traffic and transport receptors and therefore no unacceptable impact on highway safety.

Policy reference	Policy description	Compliance commentary
	• Identified impacts that will result in an unacceptable reduction in highway safety	
ES1: Achieving Design Quality	Planning applications for new development which plans positively for the achievement of high quality and inclusive design which conserves local distinctiveness and the character and aesthetic qualities of Bassingham as a traditional Lincolnshire rural settlement will be supported. Planning applications should demonstrate how development proposals design out crime where a Design and Access Statement is required.	The Design Principles take into account site context and national and local planning policy and seek to provide a balance between the need to maximise renewable energy generation whilst minimising potential adverse impacts and providing mitigation and enhancement measures. The Design Principles along with feedback received at Non-Statutory and Statutory Consultation, technical engagement with stakeholders and ongoing environmental assessment provide a framework for evolution of the design. The design of the Proposed Development is a result of this iterative process which is explained in the **Design Approach Document [EN010154/APP/7.3].** Through protective and mitigation design measures the Proposed Development has taken appropriate consideration of public safety. These are set out in the **Framework CEMP [EN010154/APP/7.7]**, **Framework OEMP [EN010154/APP/7.8]** and **Framework DEMP [EN010154/APP/7.9]** submitted with the DCO application, and will be secured by requirements 12, 13 and 20 of Schedule 2 of the **Draft**

Policy reference	Policy description	Compliance commentary
		Development Consent Order [EN010154/APP/3.1].
ES3: Heritage Assets	Heritage assets and their settings will be conserved and, where appropriate, enhanced, to maintain the quality of Bassingham's built heritage and historic environment. Any development proposal affecting heritage asset or its setting should contribute positively to conserving and enhancing the asset. Where a Design and Access Statement is required it should provide sufficient detail for proposals to be properly understood and a Heritage Statement may be necessary depending on the scale and significance of the impacts of the proposal. Requirements for information supporting such proposals may include: · Drawings showing the proposal in relation to surroundings including elevations and sections; · Three-dimensional drawings from single multiple viewpoints; and · Rendered elevations to demonstrate the proposed palette of materials. Design and Access Statements should include detail of how the proposal has taken account of the content of the latest Conservation Area appraisal.	A description of the significance of the relevant heritage assets is set out in **Table 7-9: Summary of sensitive heritage receptors and their value** of **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]** and accompanying appendices including **Appendix 7-B: Cultural Heritage Desk-Based Assessment** of the ES **[EN010154/APP/6.3]**. The impact of the Proposed Development upon heritage assets has been a key consideration in the design evolution of the Proposed Development as demonstrated with Design Principle 5 which focusses on the historic environment and is set out in Section 3.8 of the **Design Approach Document [EN010154/APP/7.3].** Design Principle 5 states that "*The Proposed Development will be sensitive to heritage assets, providing suitable offsets, and including protecting views to Lincolnshire Cathedral".* This has been incorporated into the design of the Proposed Development through the embedded mitigation measures set out in Section 7.6 of **Chapter 7: Cultural Heritage** of the **ES [EN010154/APP/6.1].**

Policy reference	Policy description	Compliance commentary
		Chapter 7: Cultural Heritage of the **ES [EN010154/APP/6.1]** presents the assessment findings of the likely significant effects on cultural heritage as a result of the Proposed Development. In terms of impacts to archaeology and designated heritage assets (Listed buildings and conservation areas), historic buildings and historic landscape elements, the assessment of the Proposed Development has concluded that there would be no adverse effects. A full appraisal of the Proposed Development against planning policy is provided in Section 6 of the **Planning Statement [EN010154/APP/7.2]**. In summary, the mitigation measures as set out in Section 7.6 of **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]** built into the Proposed Development minimise the changes to surrounding designated and built heritage assets and the historic landscape resource. It is acknowledged however that the Proposed Development would lead to less than substantial harm (at the lower end of the scale) to two designated heritage assets and one non-designated heritage asset. However, it should be noted that the effects would be both temporary and reversible, albeit long term. In Section 7.7 of **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]** it has been

Policy reference	Policy description	Compliance commentary
		assessed through a detailed settings assessment that the proposed change within the settings of the designated and non-designated heritage assets considered in the assessment would not affect their value (heritage significance), due to lack of relevant associations, intervisibility or as a result of the embedded mitigation measures (Section 7.6 of **Chapter 7: Cultural Heritage** of the ES **[EN010154/APP/6.1]**). These assets include the Bassingham Conservation Area and associated Grade II and II* Listed Buildings and non-designated assets.
ES4: Landscape and Countryside Surrounding the Village	Planning applications for new development outside the Settlement Boundary will be supported which are consistent with the Local Plan Policy LP2 and Policy LP55 and which demonstrates how the following considerations have been addressed; • Contribution to a green infrastructure network; • Utilising soft boundaries, such as tree lined native hedges; • Including characteristic landscape features, including scattered trees, farmsteads and copses, in new landscape design; • Conserving hedges and the field pattern they create or provide replacement planting where their loss cannot be avoided;	It is noted that Policies LP2 and LP55 are not within the most recently adopted Central Lincolnshire Plan (2023) but refer to the settlement hierarchy and development in the countryside from the 2017 Central Lincolnshire Local Plan. Policy S1 (The Spatial Strategy and Settlement Hierarchy) and S5 (Development in the Countryside) are considered to be the most similar policies to these in the most recently adopted Central Lincolnshire Local Plan. The Proposed Development's compliance with these policies is considered in detail underneath the Central Lincolnshire Local Plan heading in this appendix. In summary, the Proposed Development is considered to represent an acceptable form of

Policy reference	Policy description	Compliance commentary
	• Exploring opportunities for landscaping and planting to connect to existing routes and green infrastructure within the village; and/or • Avoidance of the best and most versatile agricultural land (Grades 1,2 and 3a) in preference for use of poorer quality land.	development within the countryside and would therefore comply with these policies. **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** presents the findings of an assessment of the likely significant effects of the Proposed Development upon landscape character and visual amenity. The extent of the LVIA Study Area is shown on **Figure 10-1: Landscape and Visual Impact Assessment Study Area** of the ES **[EN010154/APP/6.2].** A summary of these effects is presented in Section 6.3 of the **Planning Statement [EN010154/APP/7.2]**. Measures included in the **Framework LEMP [EN010154/APP/7.15]** include: a. A range of new habitats are proposed including woodland and tree belts, hedgerows with trees, scrub, individual trees, various forms of grassland, community orchard, localised features and arable flora which will contribute to the Green Infrastructure Network, utilise soft boundaries and include characteristic landscape features. b. The retention of existing habitats including individual trees, shrubs and woodland, hedgerows, arable land, and ponds. These

Policy reference	Policy description	Compliance commentary
		measures will maintain visual amenity, reinforce the character of the landscape, provide a structure for the addition of new planting, provide land for bird mitigation, and enhance the biodiversity value of aquatic species, maintain existing green infrastructure and create soft field boundaries. These measures will provide biodiversity enhancements providing value to wildlife, screen sensitive areas and supplement existing retained features. The **Framework LEMP [EN010154/APP/7.15]** will be secured in detail under Requirement 8 in Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. As set out in the **Design Approach Document [EN010154/APP/7.3]**, through Design Principles 1, 3, 4, 8, 9 and 10, the landscape design has sought to integrate the Proposed Development into its surrounding landscape by utilising existing features and avoiding or minimising adverse landscape and visual effects as much as possible. The design has sought to retain hedgerows, trees and woodland where possible. This is demonstrated by the retained hedgerows, trees and woodland, arable fields and ponds and the proposed hedgerows, woodlands and tree belts,

Policy reference	Policy description	Compliance commentary
		grassland and community orchards located at the site boundary and throughout the DCO Site itself. The **Framework Landscape and Ecological Management Plan [EN010154/APP/7.15]** sets out the landscape strategy and the measures that will be implemented to minimise impacts on the landscape. The Proposed Development has been designed to avoid BMV land as far as practicable. Further information on the process is set out in **Chapter 4: Alternatives and Design Evolution** of the ES **[EN010154/APP/6.1]** and **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2].** Whilst finding a site without some BMV land take was not possible due to the need for a point of connection at the proposed National Grid substation near Navenby, this was minimised through careful design, using results of the detailed study of the agricultural land quality, which can be found in **Appendix 12-B: Agricultural Land Classification Report** of the ES **[EN010154/APP/6.3]**. **Appendix A: Site Selection Report** of the **Planning Statement [EN010154/APP/7.2]** sets out how BMV agricultural land was appropriately considered; ultimately the vast majority of land within the Proposed Development is Grade 3 agricultural

Policy reference	Policy description	Compliance commentary
		land. It should be noted that a potential alternative site that was closer to the point of connection at the proposed National Grid substation near Navenby was discounted on the basis that it was comprised principally of Grade 2 BMV land. In the case of the Proposed Development, as outlined in Section 5 of **Chapter 12: Socio-Economics and Land Use** of the ES **[EN010154/APP/6.1]**, there is no Grade 1 or 2 agricultural land within the Principal Site, with approximately 27.8% being Subgrade 3a land and 68.9% being Subgrade 3b land.
ES5: Renewable Energy Schemes	Any proposal requiring a planning application for energy generating schemes and infrastructure using renewable energy sources, and new Renewal Energy Scheme development will be supported in the Neighbourhood Plan Area provided that: • On householder/domestic schemes, and any other schemes located within the Settlement Boundary, the energy generating infrastructure is located as close as practicable and is proportionate to the scale of the existing buildings and proposed development it is intended to serve. • The siting, scale and design of any energy generating infrastructure does not compromise public safety, allows continued safe use of public rights of way, and does not adversely affect existing amenities.	As set out in Section 3 of the **Planning Statement [EN010154/APP/7.2]** the Order Limits do not fall within an area designated as the settlement boundary. The Proposed Development does not comprise a householder/domestic scheme. The Applicant notes that renewable energy schemes, will be supported subject to being acceptable with regards to location, scale, siting and design, impacts on the rural, visual and historic character, and impacts on adjoining land uses. The **Design Approach Document [EN010154/APP/7.3]** and **Appendix A: Site Selection Report** of the **Planning Statement**

Policy reference	Policy description	Compliance commentary
	• Any technologies and infrastructure used to generate energy should not detract from the rural, visual and historic character of the village and the surrounding landscape setting and environment. • Adjoining land uses are not adversely impacted in terms of noise, vibration, or electromagnetic interference. • Where appropriate the energy generating infrastructure and its installation complies with the Microgeneration Certification Scheme (*).	**[EN010154/APP/7.2]** outline how the siting, scale and design has developed prior to submission. The design presented at the DCO application stage represents the outcome of several design iterations, including feedback from Non-Statutory and Statutory Consultation, ongoing technical engagement with stakeholders, discussions with landowners and the outcomes of environmental assessment. The potential changes to views during construction and operation could impact the amenity of visitor attractions and recreational facilities in the local area. The villages of Coleby, Bassingham, Navenby and Aubourn have been identified as having visitor and recreational attractions. **Chapter 10: Landscape and Visual Amenity** of the ES **[EN010154/APP/6.1]** finds that views of construction activity will be visible from these villages at a distance however activity will be largely screened by vegetation. Overall, the Proposed Development is considered to have a negligible effect on the amenity of visitor attractions and recreational facilities. The Proposed Development would require the long term closure and diversion of the following PRoW: a. LL/Aubo/10/1 PRoW;

Policy reference	Policy description	Compliance commentary

b. LL/TOTH/13/1 PRoW; and

c. LL/ThuN/2/1.

Given the large network of PRoWs, roads and existing permissive paths in the area that could be used as substitutes, the sensitivity of the PRoWs being assessed to be low and the short journey increases, the effects would be negligible.

A **Framework PRoW-MP [EN010154/APP/7.14]** has been prepared as part of the DCO application which details the mitigation measures which will be used to reduce the impacts of the Proposed Development on PRoW. The Proposed Development will also create a number of new permissive paths across the Principal Site

Assessments of the impacts on rural, visual and historic character and impacts on adjoining land uses are set out in the following chapters of the **ES [EN010154/APP/6.1]**:

a. **Chapter 7: Cultural Heritage;**

b. **Chapter 10: Landscape and Visual Amenity**;

c. **Chapter 11: Noise and Vibration**; and

d. **Chapter 12: Socio-Economics and Land Use**.

Policy reference	Policy description	Compliance commentary
		As set out in Sections 7 and 8 of the **Planning Statement [EN010154/APP/7.2],** the substantial benefits of the Proposed Development clearly and demonstrably outweigh the harms that would arise with the proposed mitigation measures in place. Adverse effects would be localised, short-term, temporary and/or reversible at the end of the Proposed Development's lifetime.

Coleby Parish Neighbourhood Plan

Relevant policy	Policy description	Compliance commentary
Policy 1: Appropriate Location for Development	1. Development proposals within the developed footprint of the village, as presented in Figure 10 of this Plan, will be supported where they comply with the criteria set out below and all relevant development plan policies. a) Development will need to demonstrate that it can be carried out without resulting in an unacceptable impact on: I. the setting of the village within the wider landscape; II. the character and appearance of the Conservation Area; III. the character, extent, setting and use of any heritage asset; IV. the landscape character within the Parish; and V. the levels of amenity that occupiers of adjacent premises may reasonably expect to enjoy. b) Development should provide safe road access and sufficient off-street parking in a form that is consistent with the established character of the village. 2. Where there is insufficient land within the developed footprint of the village to meet the growth level of the parish as set out in the Central Lincolnshire Local Plan 2012- 2036, priority should be given to development on sites within the areas considered appropriate for development in the Coleby Capacity Study and which meet the requirements of the Development Plan.	The Proposed Development, as shown in **Figure 1-1: Proposed Development Location** of the ES **[EN010154/APP/6.2]**, is not located within the developed footprint of the village.

Relevant policy	Policy description	Compliance commentary
Policy 3: Design and Character of Development	1. Development proposals will be supported where they have regard to the Coleby Character Assessment, and particularly where they: a) Respect the archaeological, historic and natural assets of the surrounding area, and take every opportunity, through design and materials, to reinforce local character and a strong sense of place; b) Recognise and reinforce local character in relation to height, scale and space between buildings; c) Would not result, either in isolation or cumulatively with any other development proposals, in the area of separation between the village and the A607 being unacceptably reduced either physically or visually; d) Respect local landscape quality ensuring that the views and vistas shown on Figure 12 are maintained wherever possible; e) Retain mature or important trees of good arboricultural and / or amenity value; and f) Respond to and enhance the setting of Local Green Spaces and other valued green spaces, such as green verges.	The Applicant has sought to embed good design principles from an early stage in the development process, as outlined in Section 1.3 of the **Design Approach Document [EN010154/APP/7.3]**. The approach responds directly to the requirements of the Coleby Character Assessment: a. As set out in **Appendix A: Site Selection Report of the Planning Statement [EN010154/APP/7.2]**, the site has been carefully selected to avoid environmentally sensitive areas, with due regard given to archaeological and historic constraints. The Design Vision and Principles (Sections 3.7 and 3.8 of the **Design Approach Document [EN010154/APP/7.3]**) guide the proposal in reinforcing the rural character and distinctiveness of the area through appropriate use of materials and integration with the existing landscape character. b. The design has been developed within a clearly defined framework that considers the height, scale, and massing of structures in the context of their surroundings as set out in **Chapter 4: Alternatives and Design Evolution** of the ES **[EN010154/APP/6.1]**. The

Relevant policy	Policy description	Compliance commentary
		Proposed Development avoids introducing built form that would be out of character with the spatial qualities of the area and ensures sufficient separation and proportionate scale. c. The location and layout of the Proposed Development have been carefully designed to maintain a physical and visual separation between the village of Coleby and the A607. The site boundary and development envelope ensure that this important area of separation is preserved. d. The design of the Proposed Development takes account of key views and vistas identified in the Coleby Character Assessment, ensuring that these are preserved wherever possible. Landscape buffers have been integrated into the layout to mitigate visual impact and protect the rural setting. Buffers and offsets are included as a design commitment in **Appendix A: Design Commitments** of the **Design Approach Document [EN010154/APP/7.3]** and will be

Relevant policy	Policy description	Compliance commentary
		secured by Requirement 6 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**.
		e. As set out in the **Design Approach Document [EN010154/APP/7.3]**, the landscape design has sought to integrate the Proposed Development into its surrounding landscape by utilising existing features and avoiding or minimising adverse landscape and visual effects as much as possible. This is evident in the retained hedgerows, trees and woodland, arable fields and ponds and the proposed hedgerows, woodlands and tree belts, grassland and community orchard, localised features, and arable flora. These measures will provide biodiversity enhancements providing value to wildlife, screen sensitive areas and supplement existing retained features.
		f. The Proposed Development would not adversely affect the function of Local Green Spaces listed in this Policy 4.

Relevant policy	Policy description	Compliance commentary
Policy 4: Local Green Space and Green Infrastructure	1. The Neighbourhood Plan designates the following locations as Local Green Spaces as shown on Figure 13 of this Plan: a) Blind Lane Green b) Coronation Crescent Green c) Tempest Green d) Far Lane Cemetery e) All Saints Church garden f) Lowfield cemetery 2. Applications for development that would adversely affect the function of a Local Green Space will not be permitted other than in very special circumstances.	The Proposed Development would not adversely affect the function of Local Green Spaces listed in this policy.
Policy 5: Access to the Countryside	1. In order to maintain and enhance access to the countryside, links to existing footpaths and rights of way shown in Figure 15 as well as improvements to footpath surfaces and signage will be sought in connection with new development for appropriate uses, where feasible. 2. Development resulting in an unacceptable adverse impact on existing footpaths and rights of way will not be supported.	The Principal Site has been designed to fit within the network of PRoW and existing permissive paths to further enhance the local connectivity. The provision and management of approximately 9.5km of new permissive paths is detailed within the **Framework PRoW-MP [EN010154/APP/7.14]** and will be secured by Requirement 18 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. The siting of solar PV panels and associated infrastructure seeks to minimise instances of development on both sides of PRoW. Where development is proposed adjacent to a PRoW, an

Relevant policy	Policy description	Compliance commentary
		offset of a minimum of 10m either side of the centre line has been incorporated as a design commitment in **Appendix A: Design Commitments** of the **Design Approach Document [EN010154/APP/7.3]** and will be secured by Requirement 6 of Schedule 2 of the **Draft Development Consent Order [EN010154/APP/3.1]**. The Proposed Development would require the long term closure and diversion of the following PRoW: a. LL/Aubo/10/1 PRoW; b. LL/TOTH/13/1 PRoW; and c. LL/ThuN/2/1. Given the large network of PRoWs, roads and existing permissive paths in the area that could be used as substitutes, the sensitivity of the PRoWs being assessed to be low and the short journey increases, the effects would be negligible. A **Framework PRoW-MP [EN010154/APP/7.14]** has been prepared as part of the DCO application which details the mitigation measures which will be used to reduce the impacts of the Proposed Development on PRoW. The Proposed Development will also create a number of new permissive paths across the Principal Site.

Appendix D Planning History

Table D-1 Planning History

Reference	Description	Location	Status (at the time of writing)	Approximate distance from the Proposed Development (in metres)
15/1347/OUT Associated applications: 24/0456/RESM 22/0174/RESM 21/0276/RESM	Erection of up to 1,100 dwellings and 150 care/retirement units (C2/C3), the formation of a roundabout to Camp Road, A46 junction improvement works, public open spaces and associated service infrastructure (outline with means of access) Associated applications: - Reserved matters application for construction of private access road to Sheepwalks Farm pursuant to outline application 15/1347/OUT-Erection of up to 1,100 dwellings and 150 care/retirement units (C2/C3), the formation of a roundabout to Camp Road, A46 junction improvement works, public open spaces and associated service infrastructure (outline with means of access) - Reserved matters application for the erection of 154 dwellings (Cell 6) with layout, scale, appearance, landscaping and access to be considered pursuant to outline planning application 15/1347/OUT - Erection of up to 1,100 dwellings and 150 care/retirement units (C2/C3), the formation of a roundabout to Camp Road, A46 junction improvement works, public open spaces and associated service infrastructure (outline with means of access) (Resubmission of 20/1659/RESM) - Application for approval of reserved matters for 181 dwellings (Cells 2a, 3a and 3b) comprising details of appearance, landscaping,	489524, 363116	Approved	123

Reference	Description	Location	Status (at the time of writing)	Approximate distance from the Proposed Development (in metres)
	layout and scale pursuant to Outline Planning Permission 15/1347/OUT - Erection of up to 1,100 dwellings and 150 care/retirement units (C2/C3), the formation of a roundabout to Camp Road, A46 junction improvement works, public open spaces and associated service infrastructure (outline with means of access).			
18/0760/OUT / 21/1045/RESM	Residential development of up to 144 dwellings and associated works (outline with means of access) / Reserved matters application for the erection of 144 no. dwellings and associated works with details of internal access road layout, appearance, landscaping, layout & scale pursuant to outline permission 18/0760/OUT.	492087, 365777	Approved	Adjacent
18/1560/EIASCO	Development of a 55km potable water pipeline from Lincoln to Grantham with associated infrastructure including partially buried 20 million litre bulk potable water storage tank, 3km connecting pipeline to Anglian Water (AWS) site at Bracebridge Heath (Bracebridge Spur), connecting sections of pipeline to the existing Central Lincs Trunk Main, partially buried 3million litre break tank and the erection of 3 pumping stations (the Grantham Resilience Pipeline Project).	Various	Scoping Opinion	Within Order Limits
20/1523/FUL	Hybrid planning application consisting of full planning permission for Phase 4 - the erection of four units comprising uses E, B2 and B8 with associated access,	488971, 361934	Approved	615

Reference	Description	Location	Status (at the time of writing)	Approximate distance from the Proposed Development (in metres)
	car parking and landscaping and outline permission with all matters reserved for phases 5 to 7 consisting of the proposed erection of commercial units comprising use classes E, B2 and B8.			
20/1736/RESM	Residential development of 70 no. affordable dwellings (Cell 2B). Reserved Matters application comprising details of appearance, landscaping, layout and scale pursuant to outline planning permission 15/1347/OUT - Erection of up to 1,100 dwellings and 150 care/retirement units (C2/C3), the formation of a roundabout to Camp Road, A46 junction improvement works, public open spaces and associated service infrastructure (outline with means of access).	489549, 363104	Approved	258
21/1245/FUL	Installation of a 100.3kW ground mounted solar PV installation comprising of 264 solar panels.	500663, 360215	Approved	943
22/0520/FUL	Installation of a ground based solar PV array (approximately 6KW)	491112, 359699	Approved	364
22/0899/FUL	Proposed hybrid planning application for the proposed Elsham to Lincoln Pipeline Scheme (potable water supply) with full planning consent sought for a proposed 57 kilometre pipeline between Elsham and Lincoln, a 1.5 kilometre spur at Welton and associated above ground infrastructure at Elsham; and outline consent for associated above ground infrastructure at Welton	Various	Approved	Adjacent

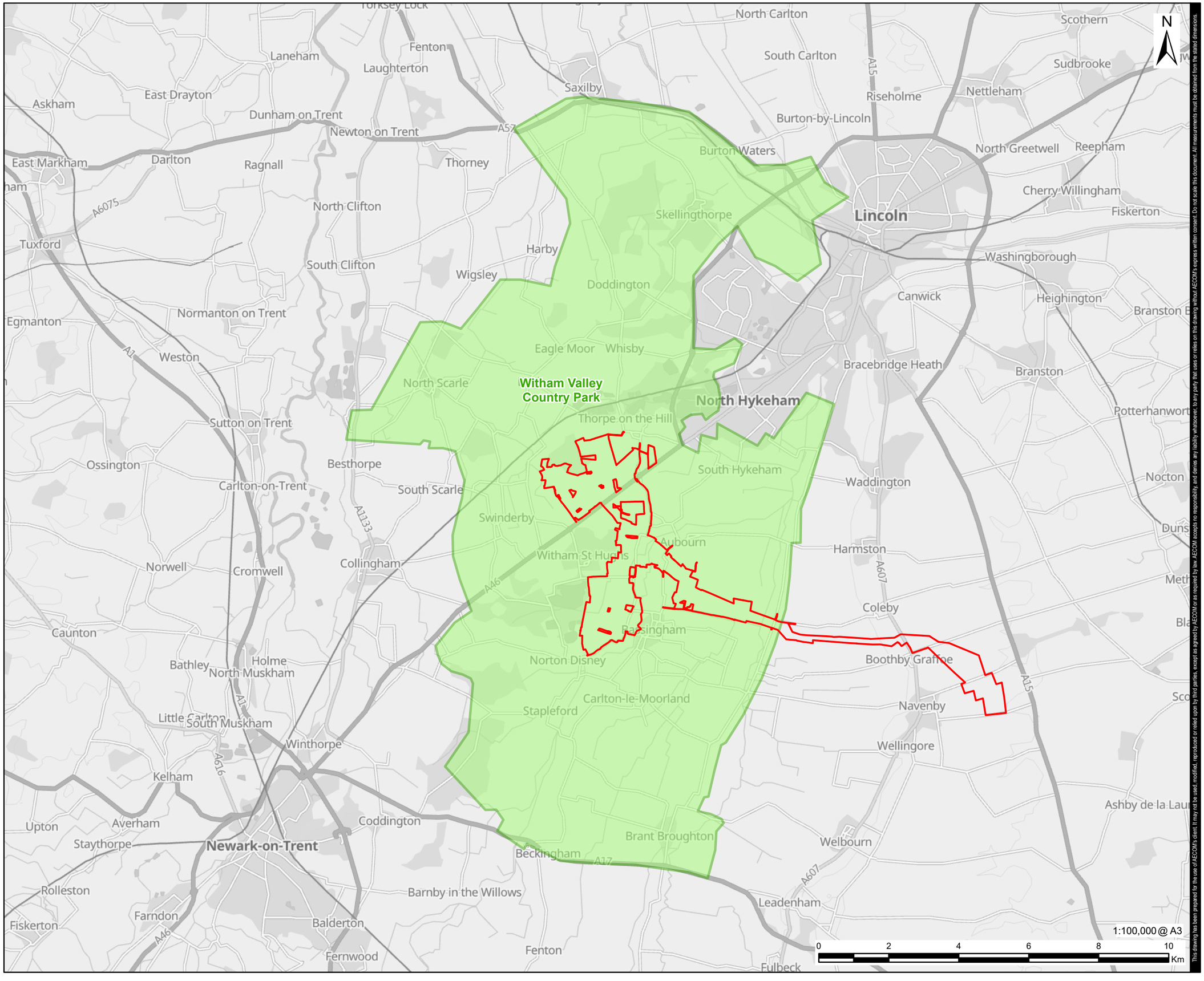
Reference	Description	Location	Status (at the time of writing)	Approximate distance from the Proposed Development (in metres)
	with all matters reserved except for access.			
22/1376/FUL	Erection of 148 dwellings with associated outbuildings/garages and landscaping/open space and affordable housing and including conversion of existing (retained) building to shop and offices	487168, 363124	Approved	1314
22/1785/FUL	Erection of 18 no. affordable houses with associated infrastructure	491297, 359653	Approved	528
EN010149	Springwell Solar Farm is a proposed new solar farm with battery storage and supporting grid connection infrastructure in North Kesteven, Lincs.	505700, 356900	Pre-Examination	Connects into Proposed National Grid substation near Navenby (no overlap with Order Limits)
25/0491/FUL	Battery Energy Storage System (BESS) and associated infrastructure	500175, 358808	Awaiting decision	Within Cable Corridor
EN010162	Solar photovoltaic array generating station, battery energy storage system and grid connection infrastructure, with a maximum generation capacity of 800MW.	479472, 360798	Pre-application	8800
EN010159	The project comprises the construction of a Solar Farm and collated Battery Energy Storage System (BESS) that would allow for the generation, export and storage of electricity exceeding 50 MW. The project include works to facilitate the construction, operation, maintenance and decommissioning of a solar photovoltaic (PV) array electricity generating facility and BESS including PV modules and mounting structures, on-site supporting equipment including inverters,	482786, 371077	Pre-application	8173

Reference	Description	Location	Status (at the time of writing)	Approximate distance from the Proposed Development (in metres)
	transformers and switchgears, on-site substations and underground cabling to connect to the National Grid substation, associated infrastructure including fencing, drainage and storage containers and biodiversity and landscaping enhancement measures, together with temporary development during the construction phase.			
PL/0055/23	To install a solar PV array development and associated infrastructure to generate electricity for the operation of Swinderby Quarry plant machinery and site offices.	487441, 361680	Approved	500
23/0628/OUT	Residential development of up to 120 no. dwellings (outline with all matters reserved)	492891, 366058	Awaiting decision	1839
PL/0087/23	For construction of the North Hykeham Relief Road (NHRR) between the A46 Hykeham Roundabout and the A15 Sleaford Road Roundabout at the end of the Lincoln Eastern Bypass, with junctions at South Hykeham Road, Brant Road and Grantham Road. The Proposed Scheme will comprise 8km of dual all-purpose carriageway with a 70mph speed limit (120kph design speed) and associated structures, earthworks, drainage, street lighting, traffic signals, utility diversions and installations, pipeline diversion, temporary materials processing, landscaping, and highway features	various (immediately adjacent at closest point)	Approved	Adjacent

Reference	Description	Location	Status (at the time of writing)	Approximate distance from the Proposed Development (in metres)
EIA/02/04	For variation of conditions 2, 28 and 29 under planning permission 14/0385/CCC - to enable a proposed revision of the restoration scheme and a change to the silt management arrangements approved at Whisby Quarry	489628, 366088	Screening Opinion	600
EIA/03/24	For the installation of floating Solar PV arrays plus terrestrial based ancillary infrastructure and equipment, cable route and access	489868, 366056	Screening Opinion	500
24/0075/EIASCR	Erection of 240MW Battery Storage Development incorporating approximately 75no. inverter skids, approximately 75 no. battery skids, approximately 4no. switchrooms, DNO equipment compound, CCTV Security Cameras, internal access road and DNO access road Request for Screening Opinion	501322, 356631	Screening Opinion	840
24/0959/FUL	Erection of a new office and training building, together with associated ancillary buildings, access (including the provision of a haul road), parking, landscaping, and all other associated works (e.g. the erection of boundary fences, external lighting, drainage, installation of a ground-mounted solar panel array and solar electrical substation as well as associated engineering, and ground modelling work).	504349, 356601	Awaiting decision	3628
EN0110016	Ground-mounted solar electricity generating station with a targeted	494373, 353368	Pre-application	6365

Reference	Description	Location	Status (at the time of writing)	Approximate distance from the Proposed Development (in metres)
	gross output of 500 to 600 Megawatts (MW) and associated grid connection infrastructure.			
PL/0097/17	To extend Norton Bottoms Quarry for the extraction of sand and gravel, together with the retention of all existing ancillary operations for the duration of the extended operations to provide a single consolidated consent for the entire site and a revised restoration strategy	487200, 357900	Granted	2538
24/1080/EIASCR	Erection of new 400kv Air Insulated Switchgear (AIS) substation and associated development	500888, 357883	Screening	0
PL/0002/25	For use of an additional area of the quarry for the recycling of construction, demolition and excavation wastes (part retrospective)	505215, 363155	Registered	6090
25/0533/FUL	Proposed battery energy storage system (BESS) together with associated infrastructure, engineering works and landscaping	495528, 359533	Awaiting decision	Within Limits Order

Appendix E Witham Valley Country Park in relation to the Proposed Development



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Project No.: 60700987 Drawn: BF Checked: AM Approved: LR Date: 2025-08-29

Fosse Green Energy

PROJECT

Fosse Green Energy

CLIENT

Fosse Green Energy Ltd

CONSULTANT

AECOM Limited
Sunley House
4 Bedford Park
Surrey, CR0 2AP, UK
www.aecom.com

LEGEND

- DCO Site Boundary
- The Witham Valley Country Park Boundary

NOTES

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Boundaries are approximate

ISSUE PURPOSE

Planning Statement

PROJECT NUMBER

60700987

FIGURE TITLE

The location of the Witham Valley Country Park and the Proposed Development

FIGURE NUMBER

Appendix E