Great North Road Solar and Biodiversity Park

Policy Compliance Document

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Contents

1 INTRODUCTION

1.1 INTRODUCTION AND PURPOSE OF THIS REPORT

1 This Policy Compliance Document (PCD) has been prepared by RPS Group (a Tetra Tech Company) on behalf of Elements Green Trent Limited ("the Applicant").

2 This PCD supports an application (the 'Application') to be made to the Secretary of State (SoS) for the 'Department for Energy Security and Net Zero' (DESNZ), under Section 37 of the Planning Act 2008 (PA 2008). The Application is for a Development Consent Order (DCO) for the construction, operation and maintenance and decommissioning of Great North Road Solar and Biodiversity Park; a proposed solar photovoltaic (PV) electricity generating facility and electrical storage facility with a total capacity exceeding 50 megawatts (MW) and an export connection to the National Grid (hereafter referred to as "the Development"). A detailed description of the existing Development Site, the physical characteristics of the Development and the proposed programme of site preparation, construction and decommissioning are described in Chapter 5 – Development Description of the Environmental Statement (ES) [EN010162/APP/6.2.5] and two alternative options are proposed to connect the 400Kv cable to the existing National Grid Staythorpe Substation.

3 The Development will have a Generating Capacity of around 800 MW, which would be equivalent to meeting the electricity requirements of up to 400,000 homes.

4 The total area of the Development Site is approximately 1,765 hectares (ha). Chapter 5 – Development Description of the ES provides further information on the Development.

5 The PCD is intended to provide the Examining Authority (the 'ExA') and interested parties with an understanding of the Applicant's position in regard to the extent to which the Development complies with relevant planning policy, with due regard to other relevant material considerations. This PCD assesses compliance for individual policies within the relevant planning policy documents.

6 This PCD is one of a suite of documents that accompany the DCO Application, including the ES and the associated surveys and assessment work. Chapter 6 – Planning Policy [EN010162/APP/6.2.6] provides a broad overview of national and local planning policies and legislative context to inform Environmental Impact Assessment (EIA). A Planning Statement (PS) [EN010162/APP/5.4] has been submitted with the Application, which assess compliance with relevant policy and reviews relevant national and local planning policy. The PS also provides analysis on the legislative context and the associated hierarchy of Planning Policy in the context of a DCO application. In addition, a separate Statement of Need (Planning Need) [EN010162/APP/7.2] accompanies the Application, to provide an assessment of the need for the Development. This PCD should be read alongside these documents.

7 This PCD demonstrates compliance with the relevant policies of the following documents:

- Overarching National Policy Statement for energy (NPS EN-1, January 2024);
- National Policy Statement for renewable energy infrastructure (NPS EN-3, January 2024);
- National Policy Statement for electricity networks infrastructure (NPS EN-5, January 2024);
- National Planning Policy Framework (NPPF, December 2024);
- Newark and Sherwood District Council Allocations and Development Management DPD (2013);
- Newark and Sherwood District Council Amended Core Strategy DPD (2019);
- Newark and Sherwood District Council Emerging Amended Allocations and Development Management DPD;
- Nottinghamshire and Nottingham Waste Core Strategy (2013);
- Nottinghamshire Minerals Local Plan (2021); and
- Nottinghamshire and Nottingham Draft Waste Local Plan.

8 The Applicant is aware of the recent consultation drafts of the NPSs in response to changing climate change policy. Please refer to the PS [EN010162/APP/5.4] for commentary on the transitional arrangements. The PS also provides the latest position of emerging documents, at the time of writing.

2 OVERARCHING NATIONAL POLICY STATEMENT FOR ENERGY (NPS EN-1)

9 The purpose of the Policy Compliance Tables is to outline the main Policy considerations that are relevant to the Development, as described in the Application and to demonstrate compliance with Policy. Not all Sections of NPS EN-1 are applicable to the Development of a Solar and Biodiversity Park and the tables outline those which are considered relevant in the preparation of the Application, noting that the site is entirely onshore and a significant distance from the Coast. The site is located entirely in the Countryside and outside of the Defined Green Belt. The Policy Compliance Tables cross reference to the relevant Documents/Reports.

Paragraph	Details	Comments
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 order to meet the goal of 70 GW of solar by 2035, and to aide the UK Government in meeting its legally binding net zero obligations, the delivery of the Development will make a significant and important contribution to meeting these targets. The Clean Power 2030 Action Plan has introduced a further Clean Power target, which seeks that by 2030, Great Britain will generate enough clean power to meet the total annual electricity demand, to only be backed up by unabated gas supply only when essential. This means transitioning the electricity system so that in a typical weather year, clean sources will produce at least as much power as Great Britain consumes in total and clean sources will produce at least 95% of Great Britain's generation. The delivery of the clean power system should lead to Great Britain becoming a net exporter of electricity. A Statement of Need (Planning Need) [EN010162/APP/7.2] provides further detail on the planning

		need for the Development. It confirms that the Development will directly help the Government to achieve its Net Zero Targets and in particular deliver against the challenging objectives set out in Clean Power 2030 by providing solar development at 'scale and pace'.
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 Development will directly provide low carbon renewable energy generation, equivalent to meeting the energy requirements of around 400,00 homes, which will significantly contribute to the Government's net zero targets. In order to achieve a Clean Power system Clean Power 2030 states this requires mass deployment of offshore wind, onshore wind and solar developments. Even with the additional 800MW provided by the Development, further projects will be required in order to achieve the Government's target of 70GW by 2035 and to achieve the aims of the Clean Power 2030 Action Plan. Section 3.4 of the Planning Statement [EN010162/APP/5.4] provides an overview of the need for the Development.
2.3.4	'Meeting these objectives necessitates a significant amount of new energy infrastructure, both large nationally significant developments and small-scale developments determined at a local level'	The Development will provide around 800MW of new energy, which will make a notable contribution to the significant amount of energy infrastructure required.
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	Section 1.3.4 of the Statement of Need (Planning Need) [EN010162/APP/7.2] acknowledges the final UK coal-fired plan (Ratcliffe-on-Soar Power Station, Nottinghamshire) closed in

	just over 76 per cent of energy supply in 2020. 26 We need to dramatically increase the volume of energy supplied from low carbon sources'	November 2024. The Development provides a significant amount of energy via solar generation, which is recognised as a low carbon source, to meet the dramatic increase required owing to the changing nature of the supply of energy in Great Britain, which includes moving away from fossil fuels.
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.'	Solar energy generation is a clean source of energy, which is recognised as being low carbon. The Development along with its associated energy storage provision, will significantly contribute to the aims of providing a secure and reliable supply of energy, as detailed in the Statement of Need (Planning Need) [EN010162/APP/7.2].
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 Development contributes to the objectives of providing clean/homegrown British energy to improve resilience and security in the supply of energy as detailed in the Statement of Need (Planning Need) [EN010162/APP/7.2].
2.6.2	'Sustainable development is relevant not just in terms of addressing climate change, but because the way energy infrastructure is deployed affects the well-being of the environment, society and the economy, for both current and future generations. For	Solar development is a renewable form of energy, which is consistent with meeting climate change objectives. Providing a secure source of energy, further contributes to the well-being of the environment, society and

	example, the availability of appropriate infrastructure supports the efficient working of the market so as to ensure competitive prices for consumers. The regulatory framework also encourages the energy industry to protect the more vulnerable.'	economy. The Development has been subject to Environmental Impact Assessment and the Planning Statement [EN010162/APP/5.4] provides an overview of the topics included in the Environmental Statement, which include socio-economic and environmental matters.
3.2.1	'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 .'	The Development contributes to the provision of homegrown energy, which is recognised in Government Policy as secure, affordable and reliable source and it will directly contribute meeting Government Policy on Net Zero, as detailed in the Planning Statement [EN010162/APP/5.4].
3.2.2	'We need a range of different types of energy infrastructure to deliver these objectives. This includes the infrastructure described within this NPS but also more nascent technologies, data, and innovative infrastructure projects consistent with these objectives.'	The Development provides solar generation and associated energy storage provision to contribute to the need for a range of different types of energy infrastructure.
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 .'	The Statement of Need (Planning Need) [EN010162/APP/7.2] acknowledges that there is no ceiling limit on the need for development and confirms that the Applicant considers the Development to be commercially viable. Proximity to existing infrastructure/a Substation which has capacity to accommodate the Development assists commercial viability. The Funding Statement [EN010162/APP/4.2] provides further detail on the Applicant.

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 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 .'	There is no limit set out in EN-1 on the need for low carbon energy development, which includes solar generation as it is recognised that the need is so great. It is anticipated that the Development will be one of a number of Developments, all of which play a vital role to achieve the Governments targets. As recently detailed in the Clean Power 2030 Action Plan, in order to achieve a Clean Power system, this requires mass deployment of offshore wind, onshore wind and solar developments. Even with the additional 800MW provided by the Development, further projects will be required in order to achieve the Government's target of 70GW by 2035 and to achieve the aims of the Clean Power 2030 Action Plan. The Statement of Planning Need outlines the relevance of Section 2.10 of NPS EN-3 which acknowledges that solar farms are one of the cheapest forms of electricity generation and that they can be built quickly. Table 5.11 of Chapter 5 – Development Description of the ES [EN010162/APP/6.2.5] confirms a 24-month implementation programme for construction of the Development. The Statement of Need [EN010162/APP/7.2] outlines matters relevant to Deliverability and concludes in their remit as an experienced solar developer, that there are no known constraints to delivery of the Development.
3.2.6	'The Secretary of State should assess all applications for	Whilst the need for the Development is already

	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.'	confirmed in the NPS, the need for the Development is discussed and demonstrated at in the Planning Statement [EN010162/APP/5.4]. In addition, a Statement of Need (Planning Need) [EN010162/APP/7.2] has also been submitted with the Application which provides further detail on the planning need for the Development and its associated energy storage provisions.
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.'	This is noted. It is acknowledged that this is a matter to be addressed by the Examining Authority in its recommendation and the subsequent Secretary of State in their decision.
3.2.8	'The Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS.'	The urgent Need for low carbon development, is already set out in the NPS, nevertheless the ability of the Development to contribute to this uncapped need is set out in the Statement of Need (Planning Need) [EN010162/APP/7.2]
3.3.1	'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...'	Solar based energy generation is regarded as a reliable source. In addition, the Development includes provision for energy storage as set out in Chapter 5 – Development Description of the Environmental Statement (EN010162/APP/6.2.5] in the form of a Battery Energy Supply System (BESS). The BESS helps to regulate supply to the Grid to meet fluctuating and peak Consumer demand.
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	Section 1.3.4 of the Statement of Need (Planning Need) [EN010162/APP/7.2] acknowledges the final UK coal-fired plan (Ratcliffe-on-

	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.'	Soar Power Station, Nottinghamshire) closed in November 2024. The Development provides a significant amount of energy via solar generation, which is recognised as a low carbon source, to meet the changing needs and associated increased demands for electricity.
3.3.4	'There are several different types of electricity infrastructure that are needed to deliver our energy objectives. Additional generating plants, electricity storage, interconnectors and electricity networks all have a role, but none of them will enable us to meet these objectives in isolation.'	The Development will provide around 800MW of energy, which will form a substantial contribution, alongside other electricity based infrastructure to contribute to these challenging energy objectives.
3.3.6	'Storage and interconnection can provide flexibility, meaning that less of the output of plant is wasted as it can either be stored or exported when there is excess production. They can also supply electricity when domestic demand is higher than generation, supporting security of supply. This means that the total amount of generating plant capacity required to meet peak demand is reduced, bringing significant system savings alongside demand side response (up to £12bn per year by 2050). Storage can also reduce the need for new network infrastructure. However, neither of these technologies, as with demand side response, are sufficient to meet the anticipated increase in total demand, and so cannot fully replace the need for new generating capacity	In order to provide for this flexibility, reliability, efficiency and resilience, the Development incorporates associated energy storage provision. The need for energy storage provision is addressed in the Statement of Need (Planning Need) [EN010162/APP/7.2].

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 statement makes it clear that whilst roof top solar can contribute to the Government's targets, utility scale ground-mounted solar developments will still be required to meet the UK's legal binding net zero goals and to achieve the Governments solar target of 70 GW by 2035. The Development provides large scale infrastructure to meet these objectives. Large scale infrastructure can be facilitated in this location as there is available capacity at the existing Staythorpe Substation to accommodate the energy that will be generated. This is reinforced by a Grid Connection Agreement, as set out in the Grid Connection Statement [EN010162/APP/7.15]. Making good use of existing substation capacity reduces the need for the development of new Grid scale substations.
3.3.14	'Value for money assessments are not required on applications for development consent for energy infrastructure projects. However, government will work to ensure there are market frameworks which promote effective competition and deliver an affordable, secure and reliable energy system and government support for specific technologies and projects will be dependent on clear value for money for consumers and taxpayers.'	Noted. EN-1 more broadly acknowledges that solar generated energy provision is affordable, sure and reliable source.
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	The provision of solar generated energy and the associated storage provision, will directly help to diversify supply, in a secure, reliable and affordable manner as set

	consistent system during the transition to 2050 for a wide range of demand, decarbonisation, and technology scenarios.'	out the Statement of Need (Planning Need) [EN010162/APP/7.2], whilst also making a significant contribution to Net Zero targets.
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.'	Please see Paragraphs 2.2.1, 2.3.3 and 3.3.12 above. The Development will form a crucial role in the delivery of net zero by 2050.
3.3.26	'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. There is currently around 4GW of electricity storage operational in GB, around 3GW of which is pumped hydro storage and around 1GW is battery storage.'	The need for storage set out in Policy is acknowledged by the Applicant and provisions have therefore been made to provide this as associated development, to serve the solar development. The Statement of Need (Planning Need) [EN010162/APP/7.2] addresses the specific need for energy storage provision
3.3.27	'Storage can provide various services, locally and at the national level. These include maximising the usable output from intermittent low carbon generation (e.g. solar and wind), reducing the total amount of generation capacity needed on the system; providing a range of balancing services to the NETSO and Distribution Network Operators (DNOs) to help operate the system; and reducing constraints on the networks, helping to defer or avoid the need for costly network upgrades as demand increases.'	The contribution that energy storage provision makes towards facilitating a balanced supply to the Grid, to meet often fluctuating demands has been acknowledged in the Application and provision of a BESS has been facilitated in the design of Development. The location of the BESS is shown on the Detail Area Masterplans [EN010162/APP/2.12].
3.3.57	'Government has committed to reduce GHG emissions by 78 per cent by 2035 under carbon budget 6.61 According to the Net Zero	The Development will demonstrably contribute to the provision of electricity from a low carbon source.

	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.'	
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 Grid Connection Statement [EN010162/APP/7.15] confirms that a Grid Connection Offer has been secured and accepted, which further demonstrates the Applicants deliverability of the development to meet these ambitious targets. Connection to the Grid is anticipated in 2027 as confirmed in the Statement of Need (Planning Need) [EN010162/APP/7.2].
3.3.59	'All the generating technologies mentioned above are urgently needed to meet the government's energy objectives by: • 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); and • 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).	The Development will directly meet the urgent need and assist in meeting the Government's energy objectives set out. The Statement of Need (Planning Need) [EN010162/APP/7.2] addresses these issues.
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	The Development directly provides nationally significant low carbon infrastructure

	which energy generating technologies are low carbon and are therefore CNP infrastructure.'	(Solar Park) to meet this Critical National Priority.
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 Infrastructure, and it should be progressed as quickly as possible.'	The weight attributed to CNP infrastructure in the planning balance is noted and discussed in Section 4 of the Planning Statement [EN010162/APP/5.4]. The Applicant is not aware of or anticipates any legal impediment which would prevent the Secretary of State taking a positive decision in respect of the Great North Road Solar and Biodiversity Park, as demonstrated throughout the ES. As discussed at Section 4 of the Planning Statement [EN010162/APP/5.4], the Applicant considers that the planning balance is overwhelmingly in favour of the Development.
3.3.65	'There is an urgent need for new electricity network infrastructure to be brought forward at pace to meet our energy objectives.'	The Development includes provisions to allow for connection to Staythorpe Substation as outlined in Chapter 5 – Development Description of the ES [EN010162/APP/6.2.5]. As the development can utilise existing capacity at Staythorpe substation, this allows for efficient connection, to facilitate prompt delivery/implementation of the Development.
3.3.81	'The importance of accelerating coordination does not, however, militate against the need for standalone electricity networks projects, and these projects are supported by this NPS and should continue to be assessed on their own merits.'	The Development is supported by the NPS and the location of development, allows for connection to existing infrastructure to be facilitated, as outlined in Chapter 5 – Development

		Description of the ES [EN010162/APP/6.2.5].
3.3.82	'Government has committed to reduce GHG emissions by 78 per cent by 2035 under CB6.65 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.'	The Development provides 800MW of energy to meet the Government objectives and increasing demands for electricity.
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.'	Table 5.11 of Chapter 5 – Development Description of the ES [EN010162/APP/6.2.5] confirms a 24-month implementation programme for construction of the Development. Prompt delivery of the Development will help to meet this urgent need.
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 presumption in favour of granting consent to applications for energy NSIPs is noted and discussed at section 4 of the Planning Statement [EN010162/APP/5.4]. No policy at either the local or national level indicates that the Development is not supported and therefore the DCO should be made. Furthermore, the Development is regarded as a CNP, as detailed further below. Section 4 of this Planning Statement [EN010162/APP/5.4] details that the planning balance, is overwhelmingly in favour of the Development.
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:	Please see section 4 of the Planning Statement [EN010162/APP/5.4] for further information. This concludes that the Planning

	• 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; and • 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'.	Balance is overwhelmingly in favour of the Development and that the mitigation hierarchy has been applied. The topic specific ES chapters have considered the benefits and any impacts of the Development both in isolation and cumulatively with other developments, with measures provided throughout in accordance with the mitigation hierarchy.
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 .'	Please see section 4 of the Planning Statement [EN010162/APP/5.4] for further information. This concludes that the Planning Balance is overwhelmingly in favour of the Development.
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.'	The Development includes mitigation land and agreements have been entered into with the relevant landowners.
Other documents		
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.'	Please see Section 2 of the Planning Statement [EN010162/APP/5.4] for further information and Chapter 6 of the ES – Planning Policy [EN010162/APP/6.2.6]. The Policy Compliance Tables

		relating to the Development Plan demonstrate compliance with local planning policy. The Development is compliant with relevant Development Plan Policies.
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.'	Please see section 2 of the Planning Statement [EN010162/APP/5.4] for further information and Chapter 6 – Planning Policy [EN010162/APP/6.2.6]. The emerging amended Allocations and Development Management Development Plan Document is gathering weight, due to the stage that it has reached at Examination. However, the Development is substantially compliant with the Policies contained therein. The emerging Nottinghamshire and Nottingham Waste Local Plan is also gathering weight, and at the time of writing, is anticipated due to the adopted shortly. However, the Development is also substantially compliance with the Policies it contains. The Policy Compliance Tables relating to the Development Plan demonstrate compliance with relevant emerging local planning policy.
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.'	Please see section 2 of the Planning Statement [EN010162/APP/5.4] for further information and Chapter 6 – Planning Policy [EN010162/APP/6.2.6] of the Environmental Statement. See above paragraph 4.1.13 above for further details.

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 Development is in substantial compliance with the Development Plan as demonstrated in the Planning Statement and the Policy Compliance Tables and there is no requirement to consider conflicts.
Development consent		
4.1.16	'The Secretary of State should only impose requirements in relation to a development consent that are necessary, relevant to planning, relevant to the development to be consented, enforceable, precise, and reasonable in all other respects.'	A Draft Development Consent Order including Requirements [EN010162/APP/3.1] is included in the Application and includes requirements that accord with these provisions.
The critical national priority for low carbon infrastructure		
4.2.1	'Government has committed to fully decarbonising the power system by 2035, subject to security of supply, to underpin its 2050 net zero ambitions. 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.'	The Development will make a significant contribution to decarbonising the power station by 2035.
4.2.2	'Ensuring the UK is more energy independent, resilient and secure requires the smooth transition to abundant, low-carbon energy. 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.'	The Development will contribute to the UKs strategy to increase the supply of low carbon energy. The Grid Connection Statement [EN010162/APP/7.15] confirms that a Grid Connection Offer has been secured and accepted,
4.2.3	'With smart and strategic planning, the UK can maintain high environmental standards and minimise impacts while increasing the levels of deployment at the scale and pace needed to meet	Please see section 4 of the Planning Statement for further information [EN010162/APP/5.4]. This concludes that the Planning

	our energy security and net zero ambitions.'	Balance is overwhelmingly in favour of the Development.
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 presumption in favour of CNP infrastructure within the planning balance is welcomed, and discussed at section 4 of the Planning Statement [EN010162/APP/5.4]. There are no known constraints which would constrain delivery of the Development in a timely manner.
4.2.5	'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 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 for electricity grid infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure. This is not limited to those associated specifically with a particular generation technology, as all new grid projects will contribute towards greater efficiency in constructing, operating and connecting low carbon infrastructure to the National Electricity Transmission System for other energy infrastructure, fuels, pipelines and storage infrastructure, which fits within the normal definition of "low carbon", such as hydrogen distribution, and carbon dioxide distribution for energy infrastructure which is directed into the NSIP regime under section 35 of the Planning	The Development falls within the definition of low carbon infrastructure.

	Act 2008, and fit within the normal definition of “low carbon”, such as interconnectors, Multi-Purpose Interconnectors, or ‘bootstraps’ to support the onshore network which are routed offshore Lifetime extensions of nationally significant low carbon infrastructure, and repowering of projects.’	
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.’	Please see section 3.4 of the Planning Statement, which details the demonstrable need case and weight attributed to renewable projects, such as the Development, which benefits from this support [EN010162/APP/5.4].
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.’	CNP policy is addressed in the Planning Statement [EN010162A/APP/5.4].
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 considers whether tests requiring clear outweighing of harm, exceptionality, or very special circumstances have been met by a CNP Infrastructure application. Further detail is	CNP policy is addressed in the Planning Statement [EN010162A/APP/5.4].

	provided in paragraphs 4.2.15 to 4.2.17, and Figure 2.'	
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.'	This Planning Statement clarifies this compliance [EN010162/APP/5.4].
4.2.11	'Applicants must apply the mitigation hierarchy and demonstrate that 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.'	The ES has taken this approach throughout. Residual effects are reported in each topic specific chapter of the ES [EN010162/APP/6.2.1 - 19 inclusive].
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 measures may be needed e.g. adaptive management. The cumulative impacts of multiple developments with residual impacts should also be considered.'	The ES has taken this approach throughout. Mitigation is secured through the DCO, to ensure implementation of the Development in accordance with the agreed mitigation measures. A Draft DCO is provided [EN010162/APP/3.1].
4.2.13	'Where residual impacts relate to HRA or MCZ sites then the Applicant must provide a derogation case, if required, in the normal way in compliance with the relevant legislation and guidance.'	There are no residual impacts that relate to HRA sites as outlined in the Planning Statement [EN010162/APP/5.4].
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	Any significant residual impacts do not outweigh the need for CNP and the exceptions do not apply.

	unlikely that consent will be refused on the basis of these residual impacts .'	
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.'	This is noted. Please see section 4 of this Planning Statement [EN01016/APP/5.4] for the Planning Balance and Conclusion.
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'.	This is noted. Please see section 4 of this Planning Statement [EN01016/APP/5.4] for the Planning Balance and Conclusion. The Development does not fall within any Green Belt, nor is it located within any nationally designated landscapes. In addition, the Development does also not cause the substantial loss to or harm of significance of any heritage assets, nor cause permanent impacts on any nearby SSSI.
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	An ES, which provides full details of the Development and the likely significant effect on the environment has been submitted with the Application.

	aspects of the environment likely to be significantly affected by the project.'	
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.'	The ES has taken this approach throughout. The methodology taken throughout the ES is detailed in Chapter 2 – Environmental Impact Assessment [EN010162/APP/6.2.2].
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 has taken this approach throughout. The methodology taken throughout the ES is detailed in Chapter 2 – Environmental Impact Assessment [EN010162/APP/6.2.2].
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 ES has taken this approach throughout. The methodology taken throughout the ES is detailed in Chapter 2 – Environmental Impact Assessment [EN010162/APP/6.2.2] and summarised in the Planning Statement [EN010162A/APP/5.4].
Applicant assessment		
4.3.10	'The applicant must provide information proportionate to the scale of the project, ensuring the information is sufficient to meet the	The ES has taken this approach throughout. The methodology taken throughout the ES is detailed in Chapter 2 – Environmental Impact

	requirements of the EIA Regulations.'	Assessment [EN010162/APP/6.2.2] and is proportionate to the scale of the project.
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'	There is a continual rapid improvement of technology with the solar photovoltaic and energy storage industry; in order to allow the most efficient technology to be utilised at the point of construction, it is essential that flexibility is embedded into the Development description. This has been achieved via the use of the Rochdale Envelope, which has established a parameters range which specify the limits for the Development and allow an assessment to be based upon the worst-case scenario, alongside an illustrative design, which provides a realistic and buildable design within the aforementioned parameters. For further information, please see Chapter 2 – Environmental Impact Assessment [EN010162/APP/6.2.2] and Chapter 5 – Development Description [EN010162/APP/6.2.5] which details the approach taken.
4.3.12	'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.'	The ES has taken this approach throughout. Please see the response to paragraph 4.3.11 above in regard to the use of the Rochdale Envelope.
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 starting point for site selection began with the acceptance of the grid connection application of the

	the applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility.'	Staythorpe substation. A site selection exercise was then undertaken including considering the technical requirements, environmental, social and economic effects and land assembly and included a consideration of alternatives. In addition, alternative technologies for generating the same output and connecting at Staythorpe were also considered and discounted, including consideration given to nuclear or hydroelectric generation and onshore wind turbines. Please see Chapter 4 – Alternatives [EN010162/APP/6.2.4] for further information alongside Design Approach Document [EN010162/APP/5.6].
4.3.16	'In some circumstances, the NPSs may impose a policy requirement to consider alternatives.'	There is no Policy requirement to consider alternatives, in this context.
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.'	Please see response to Paragraph 4.3.15 above.
4.3.18	'The Secretary of State should consider the worst-case impacts in its consideration of the application and consent, providing some flexibility in the consent to account for uncertainties in specific project details.'	Environmental Impact Assessment has taken place in the context of the Rochdale Envelope. Please see the response to paragraph 4.3.11 above. The Development will take place in accordance the parameters set out in the ES.
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	This is noted. Please see response to Paragraph 4.3.15 above. Chapter 4 – Alternatives [EN010162/APP/6.2.4] includes sections on Site Selection, Development

	regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals'.	Design and Consideration of Alternatives.
4.3.27	'Alternative proposals which mean the necessary development could not proceed, for example because the 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.'	This is noted.
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.'	This is noted. Please see response to Paragraph 4.3.15 above. Chapter 4 – Alternatives [EN010162/APP/6.2.4] includes sections on Site Selection, Development Design and Consideration of Alternatives.
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.'	The Consultation Report [EN010162/APP/5.1] details the consultation responses. The provisions for the consideration any alternatives put forward by third parties after the application has been made are noted at this stage.
Health		
4.4.1	'Energy infrastructure has the potential to impact on the health and well-being ("health") of the	Where of relevance, these have been discussed in Chapter 16 – Miscellaneous

	population. Access to energy is clearly beneficial to society and to our health 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.'	Issues [EN010162/APP/6.2.16], which includes a section on Human Health, and draws together findings of other relevant assessments across the Environmental Statement.
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'.	Where of relevance, these have been discussed in Chapter 16 – Miscellaneous Issues [EN010162/APP/6.2.16], which includes a section on Human Health, and draws together findings of other relevant assessments across the Environmental Statement.
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.'	Where of relevance, these have been discussed in Chapter 16 – Miscellaneous Issues [EN010162/APP/6.2.16], which includes a section on Human Health, and draws together findings of other relevant assessments across the Environmental Statement.
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.'	
4.4.5	'The impacts of more than one development may affect people simultaneously, so the applicant should consider the cumulative impact on health in the ES where appropriate.'	
4.4.6	'Opportunities should be taken to mitigate indirect impacts, by promoting local improvements to	Where of relevance, these have been discussed in Chapter 16 – Miscellaneous

	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'	Issues [EN010162/APP/6.2.16], which includes a section on Human Health, and draws together findings of other relevant assessments across the Environmental Statement.
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 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.'	There are no significantly detrimental impacts on health as confirmed in Chapter 16 of the ES – Miscellaneous Issues [EN010162/APP/6.2.16].
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.'	The ability for the Secretary of State to set requirements is acknowledged.
Environmental and Biodiversity Net Gain		
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. Biodiversity net gain is an essential component of environmental net gain. '	The Development is for a Solar and Biodiversity Park and improving and securing biodiversity enhancement is central to the design of the scheme, as outlined in the Design Approach Document [EN010162/APP/5.6].
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	Biodiversity net gain is provided as part of the Development, as outlined in the Ecology and Biodiversity

	natural capital, ecosystem services and the benefits they deliver when planning how to deliver biodiversity net gain.'	Chapter of the ES [EN010162/APP/6.2.8].
4.6.3	'Currently biodiversity net gain policy in England only applies to terrestrial and intertidal components of projects. Principles for Marine Net Gain are currently being rolled out by the Government, who will provide guidance in due course. There are provisions in the Environment Act 2021 to allow Marine Net Gain to be made mandatory for NSIPs in the future.'	
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.'	The Development facilitates notable biodiversity net gain, as outlined in the Chapter 8 – Ecology and Biodiversity of the ES [EN010162/APP/6.2.8] and the Planning Statement [EN01016/APP/5.4].
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.'	A Biodiversity Net Gain (BNG) Assessment is provided as part of the ES (TA A8.13) [EN010162/APP/6.4.8.13] which utilises the latest version of the biodiversity metric.
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.'	Pre-application consultation has taken place as set out in the Consultation Report [EN010162/APP/5.1].
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	The application of biodiversity net gain is outlined in Chapter 8 – Ecology and Biodiversity of the ES [EN010162/APP/6.2.8]

	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.'	
4.6.11	'Biodiversity net gain can be delivered onsite or wholly or partially off-site. We encourage details of any off-site delivery of biodiversity net gain to be set out within the application for development consent.'	Implementation of BNG will be secured by a Landscape Ecological Management Plan (LEMP) which will act as a mechanism to record and monitor ecological data on created or evolving habitats during the operational stage. An Outline LEMP (TA A5.1 [EN010162/APP/6.4.5.1]) is included as part of the Application and a final LEMP will be submitted to and approved by the LPA in accordance with a Requirement imposed through the DCO.
4.6.12	'When delivering biodiversity net gain off-site, developments should do this in a manner that best contributes to the achievement of relevant wider strategic outcomes, for example by increasing habitat connectivity, enhancing other ecosystem service outcomes, or considering use of green infrastructure strategies. Reference should be made to relevant national or local plans and strategies, to inform off-site biodiversity net gain delivery. If published, the relevant strategy is the Local Nature Recovery Strategy (LNRS). If an LNRS has not been published, the relevant consenting body or planning authority may specify alternative plans, policies or strategies to use.'	
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; • improvements to air or water quality;	A holistic approach to delivering wider environmental gains and benefits has been considered as part of the EIA. Wider environmental gains and benefits to communities are outlined in the ES Chapters [EN010162/APP/6.2]. Of particular relevance Chapter 18 - Recreation of the ES [EN010162/APP/6.2.18] outlines improved access to the countryside through the

	• 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.'	provision of permissive routes and landscape connectivity and its associated wider benefits beyond BNG is detailed in Chapter 8 – Ecology and Biodiversity of the ES [EN010162/APP/6.2.8].
4.6.14	'The Environment Act 2021 mandated the preparation of Local Nature Recovery Strategies (LNRSs) across England. They are a new system of spatial strategies for nature recovery and will play a major role in providing detail on the best locations to create, enhance and restore nature and deliver wider environmental benefits. LNRSs will also agree priorities for nature recovery and map the most valuable existing areas for nature. They will be critical in delivering new government targets for species abundance and habitat creation commitments, as well as other pressing environmental outcomes for water and flood risk, carbon and tree planting and woodland creations. LNRSs will also drive the creation of a Nature Recovery Network (NRN), a major commitment in the government's 25 Year Environment Plan.'	Chapter 8 – Ecology and Biodiversity of the ES [EN010162/APP/6.2.8] considers the emerging Nottingham and Nottinghamshire Local Nature Recovery Strategy.
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	The Development is for a Solar and Biodiversity Park and improving and securing biodiversity enhancement is central to the design of the scheme, as outlined in the

	proposals as part of good design (including any relevant operational aspects) of the project.'	Design Approach Document [EN010162/APP/5.6].
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'	The approach to facilitating wider benefits is set out in the ES and in particular Chapter 8 – Ecology and Biodiversity of the ES [EN010162/APP/6.2.8].
Criteria for good design for Energy Infrastructure		
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.'	A Design Approach Document [EN010162/APP/5.6] accompanies the submission and demonstrates that all aspects of good design have been demonstrated.
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 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'	Whilst the Applicant has limited influence over the design of electrical infrastructure associated with the Development, the Application has been submitted with the following documents which relate to the design elements; Chapter 4 – Alternatives [EN010162/APP/6.2.4]; Concept Design Parameters and Principles Document [EN010162/APP/7.14]; Design Approach Document [EN010162/APP/5.6]. These documents detail the design approach taken and how the Development

		complies with policy objectives in the NPSs in this regard. Utilising the Rochdale Envelope, this provides a set of maximum parameters for the Development from which assessments have taken place. Further information on these parameters is provided within Chapter 5 – Development Description [EN010162/APP/6.2.5]. This approach allows flexibility in the design, enabling the use of the best technology available at the time of construction whilst also allowing a set of secure limits from which assessments can be based upon. These parameters ensure the effects assessed will not be exceeded. Final design approval of the relevant elements will be agreed with the relevant planning authority, secured via a Requirement in the DCO.
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.'	Please see response to Paragraph 4.7.2 above. In addition, Chapter 15 – Climate Change [EN010162/APP/6.2.15] also considers the impact of materials and construction method. It concludes that in regard to carbon emissions savings, the Development will have a major significant beneficial effect.
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	Good design as an over-arching consideration has been central from the outset as described in

	early stages of the project lifecycle.'	Chapter 4 – Alternatives [EN010162/APP/6.2.4] and the Design Approach Document, [EN010162/APP/5.6]. These documents demonstrate how the design of the Development has been refined, following consultation and informed by environmental and technical considerations.
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.'	
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.'	
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.'	
4.7.8	'Applicants should consider taking independent professional advice on the design aspects of a proposal. In particular, the Design	

	Council123 can be asked to provide design review for nationally significant infrastructure projects and applicants are encouraged to use this service.124 Applicants should also consider any design guidance developed by the local planning authority.'	
4.7.9	'Further advice on what applicants should demonstrate by way of good design is provided in the technology specific NPSs where relevant.'	
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.'	The design of the Development balances the functional requirements of the Development with broader design objectives as set out in the Design Approach Document [EN010162/APP/5.6].
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.'	
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.'	
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.'	
4.7.14	'The Secretary of State 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.'	
4.7.15	'Further advice on what the Secretary of State should expect applicants to demonstrate by way of good design is provided in the technology specific NPSs where relevant.'	
4.10.1	'Whilst we must continue to accelerate efforts to end our contribution to climate change by reaching Net Zero greenhouse gas emissions, adaptation is also necessary to manage the impacts of current and future climate change. If new energy infrastructure is not sufficiently resilient against the possible impacts of climate change, it will not be able to satisfy the energy needs as outlined in Part 3 of this NPS.'	Climate issues are assessed and reported in Chapter 15 - Climate Change [EN010162/APP/6.2.15]. This chapter evaluates the possible impacts of the Development on the climate throughout its construction, operation, and decommissioning phases. It also examines the Development's ability to withstand the physical impacts of climate change and whether any significant effects may occur. The predicted future climatic baseline conditions have a Very Low risk of affecting the Development due to the design measures.
4.10.2	'Climate change is already altering the UK's weather patterns and this will continue to accelerate depending on global carbon emissions. This means it is likely there will be more extreme weather events. As well as climatic and seasonal changes such as hotter, drier summers and warmer, wetter winters, there is also a likelihood of increased flooding, drought, heatwaves, and intense	

	rainfall events, as well as rising sea levels, increased storms and coastal change. Adaptation is therefore necessary to deal with the potential impacts of these changes that are already happening.'	
4.10.3	'To support planning decisions, the government produces a set of UK Climate Projections as well as hazard-specific tools and guidance like the Environment Agency's climate change allowances for flood risk assessments. In addition, the government's National Adaptation Programme and Adaptation Reporting Power will ensure that reporting authorities (a defined list of public bodies and statutory undertakers, including energy utilities) assess the risks to their organisation presented by climate change.'	Environmental Impact Assessment has considered Climate Change as detailed in the ES and in particular addressed within ES Chapter 15 - Climate Change [EN010162/APP/6.2.15].
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.'	
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.'	
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.'	
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,148 Climate Impacts Tool, 149 and British Standards for climate change adaptation, 150 in accordance with the EIA Regulations.'	
4.10.10	'Applicants should assess the impacts on and from their proposed energy project across a range of climate change scenarios, in line with appropriate expert advice and guidance available at the time.'	
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.'	
4.10.12	'Where energy infrastructure has safety critical elements, the applicant should apply a credible maximum climate change scenario. It is appropriate to take a risk-averse approach with elements of infrastructure which	

	are critical to the safety of its operation.'	
4.11.1	'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 [EN010162/APP/7.15] confirms that a Grid Connection Offer has been secured and accepted and that this makes good use of existing capacity at Staythorpe substation.
4.11.2	'In the market system and in the past, it has been for the applicant to ensure that there will be necessary infrastructure and capacity within an existing or planned transmission or distribution network to accommodate the electricity generated.'	
4.11.3	'To support the achievement of the transition to net zero, government is accelerating the co-ordination of the development of the grid network to facilitate the UK's net zero energy generation development and transmission.'	
4.11.4	'Transmission network infrastructure, and related network reinforcement and upgrade works, associated with nationally significant low carbon infrastructure is considered as CNP Infrastructure. Further guidance can be found in Section 4.2 of this NPS and EN-5.'	
4.12.1	'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 (see paragraph 4.5.6 for more information).'	Environmental management from construction to decommissioning is considered as part of the Environmental Impact Assessment. The ES is accompanied by a series of environmental management plans to prevent pollution including TA A5.3 Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3], TA A5.4 Outline Fire Safety Management Plan (FSMP) [EN010162/APP/6.4.5.4], TA

		A5.5 Outline Operational Environmental Management Plan (OEMP) [EN010162/APP/6.4.5.5], and TA A5.6 Outline Decommissioning and Restoration Plan (DRP) [EN010162/APP/6.4.5.6].
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.'	This is noted. Chapter 17 – Agricultural Land [EN010162/APP/6.2.17] considers the land use, in relation to agricultural land however it should also be noted that the DCO sought is only temporary, with the Development anticipated to be decommissioned after 40 years. In addition, the application is submitted with a Commitments Schedule [EN010162/APP/7.1] alongside a number of Management Plans, which avoid or reduce relevant adverse environmental effects arising from the Development.
Safety		
4.13.1	'In addition to its role in the planning system, the 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.'	Environmental management from construction to decommissioning is considered as part of the Environmental Impact Assessment. The ES is accompanied by a series of environmental management plans to prevent pollution including TA A5.3 Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3], TA A5.4 Outline Fire Safety Management Plan (FSMP) [EN010162/APP/6.4.5.4], TA
4.13.3	'Some energy infrastructure will be subject to the Control of Major Accident Hazards (COMAH) Regulations 2015.165 These Regulations aim to prevent major	

	accidents involving dangerous substances and limit the consequences to people and the environment of any that do occur. COMAH regulations apply throughout the life cycle of the facility, i.e. from the design and build stage through to decommissioning. They are enforced by the Competent Authority comprising HSE or ONR (Office for Nuclear Regulation, for nuclear) and the EA acting jointly in England and by the HSE and NRW acting jointly in Wales, and the HSE and Scottish Environment Protection Agency (SEPA) acting jointly in Scotland.'	A5.5 Outline Operational Environmental Management Plan (OEMP) [EN010162/APP/6.4.5.5], and TA A5.6 Outline Decommissioning and Restoration Plan (DRP) [EN010162/APP/6.4.5.6].
Hazardous Substances		
4.14.1	'All establishments wishing to hold stocks of certain hazardous substances above a threshold need 'Hazardous Substances Consent.'	The Development does not contain quantities of controlled hazardous substances, which would trigger the requirement for Hazardous Substances Consent to be obtained. As such there is no requirement to consider this further.
Common Law Nuisance and Statutory Nuisance		
4.15.1	'Section 158 of the Planning Act 2008 confers statutory authority for carrying out development consented to by, or doing anything else authorised by, a Development Consent Order.'	Statutory Nuisance considerations are outlined in the Statutory Nuisances Statement [EN010162/APP/5.2].
4.15.4	'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 granting development consent (see Section 5.7 on dust, odour, artificial light etc. and Section 5.12 on noise and vibration).'	
Air Quality and Emissions		

5.2.1	'Energy infrastructure development can have adverse effects on air quality. The construction, operation and decommissioning phases can involve emissions to air which could lead to adverse impacts on health, on protected species and habitats, or on the wider countryside and species. Air emissions include particulate matter (for example dust) up to a diameter of ten microns (PM10) and up to a diameter of 2.5 microns (PM2.5) as well as gases such as sulphur dioxide, carbon monoxide and nitrogen oxides (NOx).'	Where of relevance, these have been discussed in Chapter 16 – Miscellaneous Issues [EN010162/APP/6.2.16], which includes a section on Air Quality, and draws together findings of other relevant assessments across the Environmental Statement.
5.2.2	'Legal limits for pollutants in ambient air are set out in the Air Quality Standards Regulations 2010 and for England, national objectives set out in the Air Quality (England) Regulations 2000 reiterated in the Air Quality Strategy, or for Wales, the Air Quality (Wales) Regulations 2000 and the Clean Air Plan for Wales.171 In addition, two fine particulate matter (PM2.5) targets were set under the Environment Act 2021 for England – an annual mean concentration target and a population exposure target. Internationally agreed emissions commitments are set in the National Emission Ceilings Regulations 2018 and establish limits for total UK emissions of key pollutants.'	Please see response to 5.2.1.
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,	Please see response to 5.2.1.

	especially for those who are more susceptible to the impacts of poor air quality.'	
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.'	
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, 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; Overarching National Policy Statement for Energy (EN-1) • 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.	
5.2.10	'In addition, applicants should consider the Environment Targets (Fine Particulate Matter) (England) Regulations 2022 and associated Defra guidance.'	Please see response to 5.2.1.
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 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	
Greenhouse Gas Emissions		
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:	Climate issues are assessed and reported in Chapter 15: Climate Change [EN010162/APP/6.2.15]. This chapter evaluates the possible impacts of the Development on the climate throughout its construction, operation, and decommissioning phases. It also examines the Development's ability to withstand the physical impacts of climate change and whether any significant effects may occur.
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.’	
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’	
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.’	Climate issues are assessed and reported in Chapter 15: Climate Change [EN010162/APP/6.2.15]. This chapter evaluates the possible impacts of the Development on the climate throughout its construction, operation, and decommissioning phases. It also examines the Development's ability to withstand the physical impacts of climate change and

		whether any significant effects may occur. In relation to carbon emissions savings, the Development will have a major significant beneficial effect. When considered cumulatively with UK-wide renewable energy development, it will have a major and significant beneficial effect by actively reversing the risk of severe climate change relative to the baseline scenario.
Biodiversity and Geological Conservation		
5.4.2	In the 25 Year Environment Plan, the government set out its vision for a quarter of-a-century action to help the natural world regain and retain good health. A commitment to review the plan every 5 years was set into law in the Environment Act 2021. The Environmental Improvement Plan was published in 2023, which reinforces the intent of the 25 Year Environment Plan and sets out a plan to deliver on its framework and vision. The government's policy for biodiversity in England is set out in the Environmental Improvement Plan 2023, the National Pollinator Strategy and the UK Marine Strategy. The aim 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. This aim needs to be viewed in the context of the challenge presented by climate change. Healthy, naturally functioning ecosystems and coherent ecological networks will be more resilient and adaptable to climate change effects. Failure to	The Development facilitates notable biodiversity net gain, as outlined in the Chapter 8 – Ecology and Biodiversity of the ES [EN010162/APP/6.2.8] and the Planning Statement [EN01016/APP/5.4].

	address this challenge will result in significant adverse impact on biodiversity and the ecosystem services it provides.	
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.'	A Habitats of Protected Species Plan accompanies the submission [EN010162/APP/2.7].
5.4.12	Sites of regional and local biodiversity and geological interest, which include Regionally Important Geological Sites, Local Nature Reserves and Local Wildlife Sites, are areas of substantive nature conservation value and make an important contribution to ecological networks and nature's recovery. They can also provide wider benefits including public access (where agreed), climate mitigation and helping to tackle air pollution.	Chapter 8 – Ecology and Biodiversity of the ES [EN010162/APP/6.2.8] and the Planning Statement [EN01016/APP/5.4].
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.	
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.	
5.4.15	Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland183. 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 and 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.	
5.4.16	'Many individual species receive statutory protection under a range of legislative provisions.184 Other species and habitats have been identified as being of principal importance for the conservation of biodiversity in England and Wales, as well as for their continued benefit for climate mitigation and adaptation and thereby requiring conservation action.'	
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 principal importance for the conservation of biodiversity, including irreplaceable habitats.'	Chapter 8 – Ecology and Biodiversity of the ES [EN010162/APP/6.2.8] and the Planning Statement [EN01016/APP/5.4].
5.4.19	The applicant should show how the project has taken advantage of opportunities to conserve and	

	enhance biodiversity and geological conservation interests.	
5.4.29	It is vital that applicants consider the need for compensation as early as possible in the design process as ‘retrofitting’ ompensatory measures will introduce delays and uncertainty to the consenting process.	
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 phases	
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.	
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 Environmental Improvement Plan 2023.’	
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, 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 complied with.	
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.’	Please see response above.

5.4.38	‘To further minimise any adverse impacts on geodiversity, where appropriate applicants are encouraged to produce and implement a Geodiversity Management Strategy to preserve and enhance access to geological interest features, as part of relevant development proposals.’	
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.’	
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.’	Chapter 8 – Ecology and Biodiversity of the ES [EN010162/APP/6.2.8] and the Planning Statement [EN01016/APP/5.4] concludes that the Development has been assessed as having no significant adverse effects ad significant beneficial effects for Local Wildlife sites, habitats and breeding birds during the operational stage.
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 for, then the Secretary of State will give significant weight to any residual harm.’	
5.4.44	‘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 for, then the Secretary of State will give significant weight to any residual harm.'	
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.'	
5.4.46	'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.'	
Civil and Military Aviation and Defence Interests		
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 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 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	There are no large expanses of water within the Development. No issues relating to bird strike, which may affect aviation interests and/or safety have been identified during Environmental Impact Assessment and/or Consultation.

	urgent need for new energy developments, which bring about a wide range of social, economic and environmental benefits.'	
5.5.6	'Commercial civil aviation is largely confined to designated corridors of controlled airspace and set approaches to airports. However, other aircraft often fly outside of 'controlled air space'.	
5.5.7	'The approaches and flight patterns to aerodromes can be irregular owing to a variety of factors including the performance characteristics of the aircraft concerned and the prevailing meteorological conditions. It may be possible to adapt flight patterns to work alongside new energy infrastructure without impacting on aviation safety.'	
Flood Risk		
5.8.6	'The aims of planning policy on development and flood risk are 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 areas at risk of flooding, and to steer new development to areas with the lowest risk of flooding.'	Chapter 9 – Water Resources considers flood risk and confirms that the majority of the Development is located within Flood Zone 1 (lowest risk of flooding) and defines flood resilience measures. A Flood Risk Assessment (FRA) along with the Flood Risk Sequential Test and application of the Exceptions Test, supports the Application along with (FRA) TA A9.1 [EN010162/APP/6.4.9.1]
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.'	
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.'	
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 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.'	
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.'	
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 site. Mitigation measures should make as much use as possible of natural flood management techniques.'	
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: • 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.'	A Flood Risk Assessment (FRA) along with the Flood Risk Sequential Test and application of the Exceptions Test, supports the Application along with (FRA) TA A9.1 [EN010162/APP/6.4.9.1]
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;	Chapter 9 – Water Resources considers flood risk and confirms that the majority of the Development is located within Flood Zone 1 (lowest risk of flooding). A Flood Risk Sequential Test supports the Application along with a Flood Risk Assessment (FRA) TA A9.1 [EN010162/APP/6.4.9.1]

	• 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; • 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	The FRA has been conducted in line with the relevant criteria as established within section 5.8.15. The FRA incorporates an Outline Drainage Strategy which deals with the management of water.

	these risks can be safely managed, ensuring people will not be exposed to hazardous flooding; • consider how the ability of water to soak into the ground may change with development, along with how the proposed layout of the project may affect drainage systems. Information should include: i. Describe the existing surface water drainage arrangements for the site ii. Set out (approximately) the existing rates and volumes of surface water run-off generated by the site. Detail the proposals for restricting discharge rates iii. Set out proposals for managing and discharging surface water from the site using sustainable drainage systems and accounting for the predicted impacts of climate change. If sustainable drainage systems have been rejected, present clear evidence of why their inclusion would be inappropriate iv. Demonstrate how the hierarchy of drainage options has been followed. v. Explain and justify why the types of SuDS 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 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 ix. Explain how run-off from the completed development will be prevented from causing an impact elsewhere x. 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 • be supported by appropriate data and information, including historical information on previous events.'	
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;	A Flood Risk Assessment is provided as part of Chapter 9 – Water Resources (FRA) TA A9.1 [EN010162/APP/6.4.9.1]

	• Their standard of protection is not reduced; and • Their condition or structural integrity is not reduced'	
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 owners223 and operators.	Necessary consultation has taken place as confirmed in the Consultation Report [EN010162/APP/5.1]
Historic Environment		
5.9.2	The historic environment includes all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, landscaped and planted or managed flora.	Historic Environment is assessed and reported in Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11]. A Statutory and Non-Statutory features of Historic Environment Plan accompanies the Application [EN010162/APP/2.15].
5.9.4	Some heritage assets have a level of significance that justifies official designation. Categories of designated heritage assets are: • World Heritage Sites; • Scheduled Monuments; • Protected Wreck Sites; • Protected Military Remains; • Listed Buildings; • Registered Parks and Gardens; • Registered Battlefields; • Conservation Areas; and • Registered Historic Landscapes (Wales only).	
5.9.6	Non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to Scheduled Monuments or Protected Wreck Sites should be considered subject to the policies for designated	

	heritage assets. The absence of designation for such heritage assets does not indicate lower significance or necessarily imply that it is not of national importance.	
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 4.3). 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.'	Historic Environment is assessed and reported in Chapter 11: Cultural Heritage and Archaeology [EN010162/APP/6.2.11]. The assessment has not reported any significant effects to heritage assets following the implementation of appropriate mitigation measures. No significant effects to heritage assets arising from change within their setting leading to a reduction in significance have been identified as part of this ES.
Landscape and Visual		
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 7 - Landscape and Visual Impact Assessment Chapter of the ES [EN010162/APP/6.2.7] provides an assessment of the landscape and visual impacts. The Design Approach Document (DAD) [EN010162/APP/5.6] outlines the matters relevant to the design approach.
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.'	
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.'	
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 Development and associated study area, for Landscape and Visual Impact Assessment is located outside of any designated landscape, as outlined in Chapter 7 - Landscape and Visual Impact Assessment Chapter of the ES [EN010162/APP/6.2.7].
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.'	
5.10.9	'The Secretary of State has a duty of to have regard to the statutory purposes of National Parks and AONBs in Wales when making decisions about development schemes within England which affect designated landscapes in Wales. Similar regard should also be had in relation to schemes in England which have impacts on	

	National Parks and National Scenic Areas in Scotland.'	
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 7 - Landscape and Visual Impact Assessment Chapter of the ES [EN010162/APP/6.2.7] confirms that the site selection ensures locally designated landscapes.
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.'	These requirements are assessed in Chapter 7 - Landscape and Visual Impact Assessment Chapter of the ES [EN010162/APP/6.2.7].
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.'	
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 negative effects have been minimised and opportunities for creating positive benefits or enhancement have been recognised and incorporated into	These requirements are assessed in Chapter 7 - Landscape and Visual Impact Assessment Chapter of the ES [EN010162/APP/6.2.7]. Implementation will be secured by a LEMP and an Outline LEMP is provided in the submission [EN010162/APP/6.4.5.1].

	the design, delivery and operation of the scheme.'	
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 the benefits of the mitigation to reduce the landscape and/or visual effects outweigh the marginal loss of function.'	Reductions to panel area have been targeted in areas where reductions are considered necessary to mitigate effects, and where that mitigation can be achieved, without a notable reduction in panel area. Opportunities for offsite mitigation have been considered, during the design development and assessment. See Chapter 7 – Landscape and Visual Impact Assessment [EN010162/APP/6.2.7] for further information.
5.10.27	'Adverse landscape and visual effects may be minimised through appropriate siting of infrastructure within its 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.'	Please see response to 5.10.26 above.
5.10.28	'Depending on the topography of the surrounding terrain and areas of population it may be appropriate to undertake landscaping off site. For example, filling in gaps in existing tree and hedge lines may mitigate the impact when viewed from a more distant vista.'	Please see response to 5.10.26 above.
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	No designated landscapes are affected and the Chapter 7 – Landscape and Visual Impact Assessment [EN010162/APP/6.2.7] of the ES provides an assessment of

	the benefits (including need) of the project.'	the significant effects and the mitigation proposed. Table 6 of Chapter 7 outlines the significant effects for each stage of the Development. Effects are temporary, owing to the lifespan of the Development.
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.'	
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.'	
Land Use, Including Open Space, Green Infrastructure, and Green Belt		
5.11.3	'Although the re-use of previously developed land for new development can make a major contribution to sustainable development by reducing the amount of countryside and undeveloped greenfield land that needs to be used, it may not be possible for many forms of energy infrastructure.'	National Policy recognises that there will be limited opportunities for large scale infrastructure, which includes the Development. The Site Selection rationale to accommodate the Development is addressed in the Statement of Need [EN010162/APP/7.2] and Chapter 4 – Alternatives [EN010162/APP/6.2.4]. .
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 regime, organic matter content, soil biodiversity and soil process.'	Chapter 17 - Agricultural Land Chapter of the ES considers the soil resources [EN010162/APP/6.2.17] and an Outline Soil Management Plan TA A17.2 [EN010162/APP/6.4.17.2].
5.11.5	'Where pre-existing land contamination is being considered	Land contamination issues are assessed and reported in

	within a development, the objective is to ensure that the site is suitable for its intended use. Risks would require consideration in accordance with the contaminated land statutory guidance as a minimum.'	Chapter 10: Ground Conditions [EN010162/APP/6.2.10]. This chapter concludes that no significant effects have been identified and no further mitigation measures are considered necessary. It confirms that ground investigation and geotechnical testing will take place.
5.11.6	The government's policy is to ensure there is adequate provision of high quality open space and sports and recreation facilities to meet the needs of local communities. Connecting people with open spaces, sports and recreational facilities all help to underpin people's quality of life and have a vital role to play in promoting healthy living.	Recreation is assessed and reported in Chapter 18 [EN010162/APP/6.2.18]. This chapter of the ES evaluates the likely significant effects of the Development as on publicly accessible recreation interests resources within and around the Order Limits. Beneficial effects have been identified during the operational phase of the Development on all new permissive routes. This is assessed as a major, and significant, beneficial effect.
5.11.7	Green and blue infrastructure can also enable developments to provide positive environmental, social, health and economic benefits. Green infrastructure includes green space such as parks and woodlands but also other environmental features such as street trees, hedgerows and green walls and roofs. It also includes blue infrastructure such as canals, rivers, streams, ponds, lakes and their borders. Well designed and managed green and blue infrastructure provides multiple benefits at a range of scales. It can contribute to biodiversity recovery, sequester carbon, absorb surface water, cleanse pollutants, absorb noise and reduce high temperatures. The Green Infrastructure Framework – Principles and Standards for England can be used to consider green infrastructure in development and plan for good quality and targeted creation or improvement.	

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 considered the risk posed by land contamination and how it is proposed to address this.	Please see Chapter 4 – Alternatives [EN010162/APP/6.2.4] for a full detailed assessment of existing and proposed land uses in the local area. Further information is included within the Design Approach Document (Parts 1 to 4) [EN010162/APP/5.6].
5.11.9	Applicants will need to consult the local community on their proposals to build on existing open space, sports or recreational buildings and land. Taking account of the consultations, applicants should consider providing new or additional open space including green and blue infrastructure, sport or recreation facilities, to substitute for any losses as a result of their proposal.	Recreation is assessed and reported in Chapter 18 [EN010162/APP/6.2.18]. This chapter evaluates the likely significant effects of the Development on publicly accessible recreation interests resources within and around the Order Limits. Permissive footpaths will be created as part of the Development as outlines in the Chapter.
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).	Chapter 17 – Agricultural Land [EN010162/APP/6.2.17] provides as assessment of the likely significant effect of the Development on agricultural land, soils and agricultural businesses. Technical Appendix A17.2 Outline Soil Management Plan [EN010162/APP/6.4.17.2] has been submitted with the application and contains
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.	details on how the damage to soils will be minimised and ensure that any damage is ameliorated. The requirement for the Development to be situated within this location has been considered in Chapter 4 – Alternatives [EN010162/APP/6.2.4]. See response to 5.11.12.
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.	
5.11.16	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.	A holistic approach to delivering wider environmental gains and benefits has been considered as part of the EIA. Wider environmental gains and benefits to communities are outlined in the ES Chapters [EN010162/APP/6.2].
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.	See response to 5.11.5.
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.	A Minerals Resource Assessment is included as Part of Chapter 10 – Ground Conditions of the ES (TA A10.9) [EN010162/APP/6.4.10.9] which considers addresses Policy relevant to Minerals and concludes there is compliance with Policy.
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 site is located outside of the defined Green Belt and policies relating to the Green Belt are therefore not applicable and have not been considered further.

	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).	
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 area 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 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	Chapter 8 - Ecology and Biodiversity [EN010162/APP/6.2.8] assesses the impacts on existing features and TA A8.12 Arboricultural Impact Assessment [EN010162/APP/6.4.8.12]
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.	A Minerals Resource Assessment is included as Part of Chapter 10 – Ground Conditions of the ES (TA A10.9) [EN010162/APP/6.4.10.9] which considers addresses Policy relevant to Minerals and concludes there is compliance with Policy.
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	Recreation is assessed and reported in Chapter 18 [EN010162/APP/6.2.18]. This chapter evaluates the likely significant effects of the Development as on publicly

	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.”	accessible recreation interests resources. within and around the Order Limits.
5.11.34	‘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.’	Chapter 17 – Agricultural Land [EN010162/APP/6.2.17] provides as assessment of the likely significant effect of the Development on agricultural land, soils and agricultural businesses. Technical Appendices 17.1 Agricultural Land Classification Survey (Parts 1 and 2) [EN010162/APP/6.4.17.1] details the amount of land which falls within the Best and Most Versatile Land (Grades 1-3a) with the rest falling outside of this category. Chapter 17 – Agricultural Land [EN010162/APP/6.2.17] provides as assessment of the likely significant effect of the Development on agricultural land, soils and agricultural businesses. This concludes that there is the potential for BMV land to be adversely affected during the construction and operational phase, however this is reduced to negligible on decommissioning and the restoring of arable soils with grassland for the duration of the operational phase will produce benefits for the soil resource. Technical Appendix 17.2 Soil Management Plan [EN010162/APP/6.4.17.2] has been submitted with the

		application and contains details on how the damage to soils will be minimised and ensure that any damage is ameliorated. The requirement for the Development to be situated within this location has been considered in Chapter 4 – Alternatives [EN010162/APP/6.2.4].
Noise and Vibration		
5.12.1	Excessive noise can have wide-ranging impacts on the quality of human life and health such as annoyance, sleep disturbance, cardiovascular disease and mental ill-health. 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.	Noise and Vibration are assessed in Chapter 12 – Noise and Vibration [EN010162/APP/6.2.12]. This chapter has assessed the significance of potential noise and vibration effects during the construction, operational and decommissioning phases, and concludes that noise or vibration effects are not significant in terms of the EIA Regulations. This has been conducted and assessed in line with the relevant criteria listed in 5.12.6.
5.12.2	The Government's policy on noise is set out in the Noise Policy Statement for England. 259 It promotes good health and good quality of life through effective noise management. Similar considerations apply to vibration, which can also cause damage to buildings. In this section, in line with current legislation, references to "noise" below apply equally to the assessment of impacts of vibration.	
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.	
5.12.5	Factors that will determine the likely noise impact of a proposed development include: • the inherent operational noise from the proposed development, and its characteristics; • the proximity of the proposed development to noise sensitive premises (including residential properties, schools and hospitals) and noise sensitive areas (including certain parks and open spaces); • the proximity of the proposed development to quiet places and other areas that are particularly valued for their soundscape or landscape quality; • the proximity of the proposed development to sites where noise may have an adverse impact on protected species or other wildlife, including migratory species; and • the potential presence of unexploded ordnance on the seabed.	
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 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 are often disproportionately affected by noise-sensitive areas; • if likely to cause disturbance, an assessment of the effect of underwater or subterranean noise; and • all reasonable steps taken to mitigate and minimise potential adverse effects on health and quality of life.	
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.	
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	Not relevant.

	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	
5.12.10	Some noise impacts will be controlled through environmental permits and parallel tracking is encouraged where noise impacts determined by an environmental permit interface with planning issues (i.e. physical design and location of development). The applicant should consult the EA and/or the SNCB, and other relevant bodies, such the MMO or NRW, as necessary, and in particular regarding assessment of noise on protected species or other wildlife. The results of any noise surveys and predictions may inform the ecological assessment. The seasonality of potentially affected species in nearby sites may also need to be considered.	Not relevant.
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 by natural or purpose-built barriers, or other buildings; • administrative: using planning conditions/obligations to restrict	See response to 5.12.61.

	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; and • insulation: mitigating the impact on areas likely to be affected by noise including through noise insulation when the impact is on a building.	
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).	See response to 5.12.1
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; and • where possible, contribute to improvements to health and quality of life through the effective management and control of noise.	See response to 5.12.1.
Socio-Economic Impacts		

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).	Socio-economic impacts are assessed in Chapter 13 – Socioeconomics and Tourism [EN010162/APP/6.2.13]. The Assessment accounts for socio-economic impact across all levels. Taking into account the mitigation measures described within the chapter, significant effects with respect to Socio-Economics and tourism are only likely to occur in relation to construction phase employment, economic output, during all phases and skills and training during construction and operational phase. No significant cumulative effects are likely to occur with respect to Socio-Economics and recreation. With respect to Socio-Economic and recreation, no transboundary effects are likely to occur during construction, operation and maintenance and decommissioning of the Development on the interests of European Economic Area states.
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.	
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; • 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 users 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; and • cumulative effects - if development consent were to be granted 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 potential shortage of construction workers to meet the needs of other industries and major projects within the region.	
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.	
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.	
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.	
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.	
5.13.9	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).	The compelling need for the Development is set out in the Statement of Need (Planning Need [EN010162/APP/7.2].
Traffic and Transport		
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 14 - Traffic and Access [EN010162/APP/6.2.14]. assesses the potential transport related environmental effects of the Development arising during the construction, operation and decommissioning phases. Technical Appendix TA A5.2 Outline Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2] also forms part of the Submission. This assessment has demonstrated that none of the effects associated with traffic movements during the life of the Development, are considered to lead to significant effects on environmental receptors.

		The main traffic effects are associated with the increase in vehicle movements along the local roads leading to the site during the construction phase. Whilst the percentage increases are likely to be high on the local roads, this is as a result of the low base traffic flow numbers along these roads. A final CTMP will be developed and agreed with the relevant stakeholders prior to construction, in order to control and mitigate effects associated with vehicle movements.
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.	Please see response to Paragraph 5.14.1 above.
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. Applicants should consult with National Highways and Highways Authorities as appropriate on the assessment and mitigation to inform the application to be submitted.	Consultation has taken place as outlined in the Consultation Report [EN010162/APP/5.1]
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	Chapter 14 - Traffic and Access [EN010162/APP/6.2.14]. assesses the potential transport related environmental effects of the Development arising during

	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.	the construction, operation and decommissioning phases. Technical Appendix A14.2 Outline Construction Travel Plan (CTP) [EN010162/APP/6.4.14.2] and a Traffic Regulation Measures Plan [EN010162/APP/2.13] also form part of the Submission. This assessment has demonstrated that none of the effects associated with traffic movements during the life of the Development are considered to lead to significant effects on environmental receptors. The main traffic effects are associated with the increase in vehicle movements along the local roads leading to the site during the construction phase. Whilst the percentage increases are likely to be high on the local roads, this is as a result of the low base traffic flow numbers along these roads.
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.	Please see response to Paragraph 5.14.1 above.
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	Please see response to Paragraph 5.14.1 above.

	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; and • ensure satisfactory arrangements for reasonably foreseeable abnormal disruption, in consultation with network providers and the responsible police force.	
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.	Please see response to Paragraph 5.14.1 above. The Traffic and Access Chapter of the ES includes a Construction Traffic Management Plan TA A5.2 Outline Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2]
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.	This is noted. Please see response to Paragraph 5.14.1 above.
Resource and Waste Management		
5.15.1	Government policy on hazardous and non-hazardous waste is intended to protect human health and the environment by producing less waste and by using it as a	An Outline Operational Environmental Management Plan has been provided as part of the submission TA A5.5 Outline Operational

	resource wherever possible. Where this is not possible and disposal is required as a last resort, waste management regulation ensures that waste is disposed of in a way that is least damaging to the environment and to human health.	Environmental Management Plan (OEMP) [EN010162/APP/6.4.5.5] and is capable of providing mechanisms to manage waste through a Site Waste Management Plan and Pollution Prevention Plan. Disposal at the Decommissioning stage can be managed through the Decommissioning and Restoration Plan TA A5.6 Outline Decommissioning and Restoration Plan (DRP) [EN010162/APP/6.4.5.6].
5.15.2	Sustainable waste management is implemented through the waste hierarchy, which sets out the priorities that must be applied when managing waste. These are (in order): • prevention; • preparing for reuse; • recycling; • other recovery, including energy recovery; and • disposal.	Chapter 10 – Ground Conditions [EN010162/APP/6.2.10] assesses waste and natural resources. Waste minimisation measures will be adopted as part of the Technical Appendix 5.6 Outline Decommissioning and Restoration Plan [EN010162/APP/6.4.5.6]. It is concluded that there will be no likely significant effects arising from the Development during the construction, operation and maintenance or decommissioning phases.
5.15.3	Disposal of waste should only be considered where other waste management options are not available or where it is the best overall environmental outcome	

3 NATIONAL POLICY STATEMENT FOR RENEWABLE ENERGY INFRASTRUCTURE (NPS EN-3)

1 The purpose of the Policy Compliance Tables is to outline the main Policy considerations that are relevant to the Development, as described in the Application and to demonstrate compliance with Policy. Not all Sections of NPS EN-3 are applicable to the Development of a Solar and Biodiversity Park and the tables outline those which are considered relevant in the preparation of the Application, noting that the site is entirely onshore and a significant distance from the Coast. The site is located entirely in the Countryside and outside of the Defined Green Belt. The Policy Compliance Tables cross reference to the relevant Documents/Reports.

Paragraph	Details	Comments
2.3 Factors influencing site selection and design		
National Designations		
2.3.6	'When considering applications for CNP Infrastructure in sites with nationally recognised designations (such as SSSIs, National Nature Reserves, National Parks, the Broads, Areas of Outstanding Natural Beauty, Registered Parks and Gardens, and World Heritage Sites), the Secretary of State will take as the starting point that the relevant tests in Sections 5.4 and 5.10 of EN-1 have been met, and any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by the urgent need for this type of infrastructure.'	The Development does not fall within any nationally protected landscapes, registered parks and garden nor a world heritage site however the Order Limits interact with a small number of nationally designated ecological designations. Chapter 8 – Ecology and Biodiversity [EN010162/APP/6.2.8] considers these in detail, and concludes that no significant adverse effects are predicted when mitigation embedded into the design is taken into account. Significant beneficial effects are predicted for some features over the operation phase of the Development. A planning balance is provided at Section 4 of the Planning Statement [EN010162/APP/5.4]. The Planning Statement concludes that the Development is in accordance, or substantially in accordance, with the

		relevant Development Plans and other policy documents.
2.3.8	'In considering the impact on the historic environment as set out in Section 5.9 of EN-1 and whether the Secretary of State is satisfied that the substantial public benefits would outweigh any loss or harm to the significance of a designated heritage asset, the Secretary of State should take into account the positive role that large-scale renewable projects play in the mitigation of climate change, the delivery of energy security and the urgency of meeting the net zero target.'	Chapter 11 – Cultural Heritage and Archaeology [EN010162/APP/6.2.11] details that with mitigation, minor adverse or negligible effects are anticipated, which are not significant in Environmental Impact Assessment (EIA) terms. Mitigation includes preservation in situ or preservation by record. No significant effects to heritage assets arising from change within their setting leading to a reduction in significance has been identified. Commitments are secured via the Commitment Register [EN010162/APP/7.1]. The positive role that the Development will play in the mitigation of climate change, delivery of energy security and the urgency to meet the net zero target weighs heavily in favour of the granting of development consent.
Other Locational Considerations		
2.3.9	'As 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).'	It is noted that there is an absence of any limit on the need however a Statement of Need (Planning Need) [EN010162/APP/7.2] has been submitted with the Application which provides an overview of the strategic need to renewable energy generation embedded in key relevant Legislation and Government Policy. Regarding the avoidance of taking a consecutive approach in the consideration of the location of renewable

		energy development Chapter 4 – Alternatives [EN010162/APP/6.2.4] provides commentary on the approach to alternatives. Further information can also be found in the Design Approach Document [EN010162/APP/5.6].
2.4 Climate change adaption and resilience		
Solar photovoltaic		
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.'	Chapter 9 – Water Resources [EN010162/APP/6.2.9] concludes that there is an anticipated minor to negligible significant effect on water resources, which are not considered to be significant in EIA terms. A Flood Risk Assessment (FRA)has been submitted with the Application (TA A9.1 [EN010162/APP/6.4.9.1]). The BESS units will be elevated from the ground by approximately 300 mm so the Development can remain safe and operational should groundwater emerge. Chapter 15 – Climate Change [EN010162/APP/6.2.15] details as a whole, when considered cumulatively with UK-wide renewable energy development, the Development will have a major and significant positive effect by actively reversing the risk of severe climate change, compared to the baseline scenario.
2.5 Consideration of good design for energy infrastructure		
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-	Chapter 4 – Alternatives [EN010162/APP/6.2.4] provides detail on the development design.

	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.'	In addition, Design Approach Document [EN010162/APP/5.6] and the Concept Design Parameters and Principles Document [EN010162/APP/7.14] details the design process and key principles and parameters that have informed the Development design and the EIA. Final design details will be secured via Requirement in the Development Consent Order.
2.6 Flexibility in the project details		
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.'	It is essential to provide for flexibility in the Development description to allow for the most efficient technology possible to be utilised by the Development at the point of construction. See Chapter 5 – Development Description [EN010162/APP/6.2.5] for further information. The draft DCO includes a list of draft Requirements [EN010162/APP/3.1], which detail the plans which will require subsequent approval from the relevant planning authority.
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.'	This approach has been taken throughout the Environmental Statement. See Chapter 2 – Environmental Impact Assessment [EN010162/APP/6.2.2] for further information of the process and methodology taken. The Rochdale Envelope approach has been adopted throughout the assessment of the Development, which provides for a likely worst case scenario.

2.10 Solar Photovoltaic Generation		
Introduction		
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.	It is acknowledged that solar is a key part of the Governments strategy for low-cost decarbonisation of the energy sector.
2.10.10	'Solar also has an important role in delivering the government's goals for greater energy independence. 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 example, agriculture, onshore wind generation, or storage) to maximise the efficiency of land use".'	The Statement of Need (Planning Need) [EN010162/APP/7.2] provides a summary of the strategic need for renewable energy generation embedded in key relevant Legislation and Government Policy and details how the Development is designed to spearhead the renewable transformation of UK energy generation. The Development is co-located with BESS to provide stabilisation in the supply of energy to maximise efficiency. The Development also intends to continue agricultural use, in the form of sheep grazing and/or cutting production.
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	Please see response to Paragraph 2.10.10 above regarding the urgent need to deliver renewable developments, including solar and BESS. There is a conflict between this statement and paragraph 2.3.9 in terms of the requirement for a consecutive approach to be adopted but as stated above, the Development comprises of solar and complementary agricultural use, with associated environmental improvement.

	production or environmental improvement.	
2.10.13	Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation.	It is acknowledged that solar is a key part of the Government's strategy for low-cost decarbonisation of the energy sector.
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.	The Development can be delivered, efficiently and within the timescales set out in the Application, to contribute to the accelerated pace of delivery that Clean Power 2030 states is urgently required. Chapter 5 – Development Description of the Environmental Statement (ES) [EN010162/APP/6.2.5] confirms a 24-month implementation programme for construction of the Development.
2.10.15	Solar farm proposals are currently likely to consist of solar panel arrays, mounting structures, piles, inverters, transformers and cables.	Chapter 5 – Development Description [EN01016/APP/6.2.5] provides full detail of the Development. Following consent and final detailed design, a final build plan, secured via Requirement in the DCO will be submitted to the relevant authorities for approval.
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, electrolysers associated with the production of low carbon hydrogen, or security arrangements (which may encompass flood defences, fencing, lighting and surveillance).	The Development also comprises of energy storage and support this being appropriately considered as associated infrastructure. Chapter 5 – Development Description [EN01016A/APP/6.2.5] provides a breakdown of all the Development components including all associated infrastructure.
2.10.17	Along with associated infrastructure, a solar farm requires between 2 to 4	The Order Limits total a gross area of approximately 1,765

	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.	ha (4361.4 acres) with the installation of solar panels across a net area of approximately 1,025 ha (2532.8 acres). Calculated on a net basis against the 800MW proposed, this equates to 1.28 ha (3.17 acres) for each MW of output. The rest of the area included within the Order Limits comprises of energy storage and associated development infrastructure along with biodiversity and landscape enhancements including 31 ha of new woodland, 22 ha of woodland ecotone and 50 km of new species-rich hedgerow.
Applicant Assessment		
Factors influencing site selection and designation		
Irradiance and site topography		
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 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'	A south-facing arrangement has been adopted. See Design Approach Document [EN010162/APP/5.6] for further details regarding the Developments design. In addition, the Concept Design Parameters and Principles Document [EN010162/APP/7.14] sets out the design parameters and principles that have informed the Development design and the EIA. It will be secured via a Requirement in the draft DCO which will ensure that the guiding principles and parameters shape the detailed design of the Development. Chapter 4 – Alternatives [EN010162/APP/6.2.4] is also of relevance.

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 further to maximise the solar resource.'	Please see response to paragraph 2.10.19 above. The Design Approach Document [EN010162/APP/5.6] confirms that the solar panels will be tilted at a fixed angle.
Network Connection		
2.10.21	'Applicants should consider important issues relating to network connection at Section 4.11 of EN-1 and in EN-5 ....'	The Development benefits from a grid connection awarded by from National Grid Electricity System Operator Limited (NGESO) to connect to the Development to the National Electricity Transmission System (NETS) with a Stage 1 connection date of May 2027 and a Stage 2 connection date of 2028. A Grid Connection Statement has been submitted as part of the Application and provides further detail [EN010162/APP/7.15].
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 Grid Connection Statement [EN010162/APP/7.15] confirms that the Development has secured a grid connection agreement permitting the export and import of around 800 megawatts (AC) of electricity via the 400kV National Grid Staythorpe Substation. This allows the Development straightforward access to one of the main transmission circuits as well as into the distribution network for local electrical demand in Newark, Nottingham and surrounding villages.
2.10.23	'Larger developments may seek connection to the transmission network if there is available network	Please see response to Paragraph 2.10.21 above.

	capacity and/or supportive infrastructure.'	
2.10.24	'In either case 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.'	Please see Chapter 4 – Alternatives [EN010162/APP/6.2.4] for details on how the grid connection has influenced the location of the Development.
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.'	Please see responses to Paragraphs 2.10.21 and 2.10.24 above. The Development makes use of existing and available capacity at the Staythorpe substation.
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.'	Chapter 2 – Environmental Impact Assessment [EN010162/APP/6.2.2] and Technical Appendix A2.1, Cumulative Assessment Stages 1 and 2 [EN010162/APP/6.4.2.1] details the approach to Cumulative Effects Assessment and Interrelationships. Each ES topic chapter includes a cumulative effects assessment for that specific topic and identified receptors. Chapter 4 – Alternatives [EN01016A/APP/6.2.4] also provides detail on how the cumulative impacts of situating a solar farm in proximity to other energy generating stations and infrastructure was taken into account in the initial site selection stages.
Proximity of a site to dwellings		

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 2.10.93-2.10.101) and Glint and Glare (paragraphs 2.10.102 – 2.10.106) impact sections below'	It has been recognised that landscape and visual impacts are one of the main environmental effects which typically arise from solar development. One of the Project Specific Design Principles (PL5) within the Design Approach Document [EN010162/APP/5.6] is to *"design with local landscape character in mind, providing a legacy of landscape enhancement."* See Chapter 7 – Landscape and Visual Impact Assessment [EN010162/APP/6.2.7], Technical Appendix A16.2, Glint and Glare Assessment [EN010162/APP/6.4.16.1], Design Approach Document [EN010162/APP/5.6] and Technical Appendix A7.6 Residential Visual Amenity Assessment [EN010162/APP/6.4.7.6] for further details.
Agriculture land classification and land type		
2.10.28	'Solar is a highly flexible technology and as such can be deployed on a wide variety of land types'	This is noted.
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	The approach to site selection is detailed in Chapter 4 – Alternatives [EN010162/APP/6.2.4]. Chapter 17 – Agricultural Land [EN010162/APP/6.2.17] provides detail relating to Agricultural Land Classification (ALC) and Best and Most Versatile (BMV) land. The Development seeks to avoid the highest grade land where possible.

	grades 1, 2 and 3a of the Agricultural Land Classification'	Across England, there is an estimated 3,7000,000 hectares of BMV land. The BMV within the Development, excluding the Works No. 2, Cables (which will not be affected other than short-term), represents a reduction of 0.028%. With mitigation measures, as set out in the outline Soil Management Plan (oSMP), the residual effects are as follows: Construction Phase; Agricultural land quality: Minor adverse effects Soils: Minor adverse effects Farm businesses and economics: minor or negligible significance Operation Phase; Agricultural land quality: Negligible significance Soils: Minor significant effects Farm businesses and economics: Minor or negligible significance Food production: Negligible impact Decommissioning Phase; Agricultural land quality: Minor adverse effects Soils: Minor adverse effects Farm businesses and economic effects: Minor or negligible adverse None of the above effects are considered to be significant in EIA terms. No significant

		cumulative effects are assessed as likely to arise. Technical Appendix A17.1 provides an Agricultural Land Classification Survey [EN010162/APP/6.4.17.1]. If a worst-case assessment regarding the substations is taken and are not removed on decommissioning, the loss of impact would be 4.5 ha of BMV (subgrade 3a). This represents a negligible proportion of BMV agricultural land at a District, County and National Level. If the substations are removed, the impact on BMV would only be temporary.
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.'	These impacts are considered within the relevant chapters throughout the ES and within the Planning Statement [EN01016A/APP/5.4].
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.'	The approach to site selection has been discussed in Chapter 4 - Alternatives [EN010162/APP/6.2.4].
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	Sheep grazing and/or grass cutting is proposed in order to maintain field vegetation during the operational phase. In addition, the Development includes a BESS for efficient storage of power for managed release to the grid,

	electrolysers) to maximise the efficiency of land use.'	and therefore seeks to maximise the efficient use of land. See Chapter 5 – Development Description [EN010162/APP/6.2.5] for further details.
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.'	Chapter 17 – Agricultural Land [EN010162/APP/6.2.17] assesses the impacts of the Development by reference to the ALC and details on soil sampling. Technical Appendix A17.2 provides the outline Soil Management Plan (oSMP) [EN010162/APP/6.4.17.2] wh ich details soil types and minimises the effects on soils and land quality. Practices set out in the oSMP will be embedded in the construction methodology. A final SMP is secured via requirement in the draft DCO [EN010162/APP/3.1].
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 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.'	Please see response to Paragraph 2.10.33 above.
Accessibility		
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.'	Chapter 14 – Traffic and Access [EN010162/APP/6.2.14] details the proposed access routes. No significant effects are anticipated. Technical Appendix A5.2, outline Construction Traffic

		Management Plan (oCTMP) [EN010162/APP/6.4.5.2] for ms part of the Application and provides for construction traffic to use specified routes and avoid peak and other sensitive times of the day. A final CTMP, secured via a Requirement in the DCO, will be developed and agreed with the relevant stakeholders prior to construction, and will seek to control and mitigate effects associated with vehicle movements. In regard to the operational phase, the volume of traffic associated with the operational phase will be low, and no significant effects are anticipated.
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.'	Please see response to Paragraph 2.10.35 above.
2.10.37	'Developers will usually need to construct on-site access routes for operation and maintenance activities, such as footpaths, earthworks, or landscaping.'	Access routes will be created during construction. During the operational phase, use will be made of existing farm tracks wherever possible. Full details are provided in Chapter 14 – Traffic and Access [EN010162/APP/6.2.14] and the accompanying technical appendices.
2.10.38	'In addition, sometimes access routes will need to be constructed to connect solar farms to the public road network.'	Prioritization has been given to the use of existing accesses where possible. Where this is not possible, accesses have been identified in locations where highway safety is not compromised. Full details are provided in Chapter 14 – Traffic and Access

		[EN010162/APP/6.2.14] and the accompanying technical appendices.
2.10.39	‘Applications should include the full extent of the access routes necessary for operation and maintenance and an assessment of their effects.’	The Application identifies all access requirements for each stage of the Development’s life and these have been assessed as reported in Chapter 14 – Traffic and Access [EN010162/APP/6.2.14] which provides an assessment of their effects. Details are also provided in Technical Appendix A14.1, Transport Statement [EN010162/APP/6.4.14.1]
Public rights of way		
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.’	Consideration has been given of the effect of the Development on Public Rights of Way (PRoW) in Chapter 18 – Recreation [EN010162/APP/6.2.18]. This includes details of discussions held between the Applicant and Nottinghamshire County Council (the authority responsible for PRoWs). This Chapter concludes that whilst there are some adverse effects on PRoWs during construction and operation, which largely arise due to either partial, temporary closure of PRoWs or diversions, these effects are not considered to be significant in EIA terms. However, beneficial effects have been identified during the operational phase as a consequence of the provision of new permissive routes, which has been assessed as being significant for one route, due to the

		implementation of 12.5km of permissive new route, contributing to the connectivity and recreational amenity in the area. Technical Appendix A18.1, outline Recreational Routes Management Plan (oRRMP) [EN010162/APP/6.4.18.1] has been submitted with the Application, with a final version, which will be in accordance with the outline, to be prepared and submitted to Newark and Sherwood District Council for agreement, following DCO consent. Technical Appendix A4.1 Public Rights of Way Strategy [EN010162/APP/6.4.4.1] sets out the approach undertaken to manage changes to PRoWs, including diversion of existing footpaths and bridleways and creation of new permissive footpaths and bridleways. The above documents also consider the protection of users of PRoWs from construction, operational and decommissioning traffic.
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.'	Please see response to Paragraph 2.10.41 above. The Development both minimises impacts on existing routes and provides 21 new permissive footpaths during the operational phase, to encourage public accessibility to local recreational opportunities.
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	The visual impacts for those using PRoWs are discussed in Chapter 7 – Landscape and Visual Impact Assessment

	have on any other visual amenities in the surrounding landscape.'	[EN010162/APP/6.2.7]. This concludes that the effects on users on 6 PRoWs would be major/moderate adverse and significant during construction and early operation however no significant effects were found for users of long distance recreational routes. It has been assessed that for some of the routes assessed, during operation and decommissioning, there would be a reduction in effects due to mitigation planting screening the Development. After decommissioning, only one PRoW (NT Sutton-on-Trent BW14) would still be subject to major adverse effects as a result of direct and indirect effects from the shared route of the PRoW with the proposed route of decommissioning traffic
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 detailed in Chapter 18 – Recreation [EN010162/APP/6.2.18], 21 new permissive paths and six new permissive bridleways have been proposed, creating 32.6km of new permissive route. A circular recreational route would also be created around the Order Limits, including 12.5km of new permissive path. Technical Appendix A4.1 Public Rights of Way Strategy [EN010162/APP/6.4.4.1] sets out the approach undertaken to manage changes to PRoW, including diversions of existing footpaths and bridleways as well as the creation of new permissive footpaths and bridleways.

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.’	Technical Appendix A18.1 outline Recreational Routes Management Plan (oRRMP) [EN010162/APP/6.4.18.1] has been prepared and submitted with the Application. The oRRMP includes a number of proposed safety measures such as temporary fencing or distancing tactics to form safe corridors of routes in areas adjacent to construction works. In addition, measures such as the provision of banksmen at either end of the PRoW to hold vehicles if a PRoW user is present and advise PRoW users on the potential for construction vehicles to be present have been proposed where a vehicle track crosses a PRoW. Following consent, a final version of the RRMP will be prepared, in accordance with the outline, and submitted to Newark and Sherwood District Council for approval. This will be secured through a DCO requirement.
Security and Lighting		
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.’	See Chapter 5 – Development Description [EN010162/APP/6.2.5] for detail regarding security and lighting. Fencing is proposed, alongside pole-mounted CCTV systems and movement-triggered lighting and passive infra-red sensors at critical infrastructure and construction compounds.
2.10.47	Applicants should assess the visual impact of these security measures, as well as the impacts on local residents, including for example	The movement triggered lighting and infra-red sensors provide security without causing unnecessary impacts

	issues relating to intrusion from CCTV and light pollution in the vicinity of the site.	on receptors including local residents. Fencing and CCTV are not visible above the hedges as far as practicable. The design of security measures is detailed in Chapter 5 - Development Description [EN010162/APP/6.2.5]. The design of CCTV and lighting has been undertaken to minimise the frequency and duration use of lighting and the perceived intrusiveness of CCTV and other security measures.
2.10.48	Applicants should consider the need to minimise the impact on the landscape and the visual impact of security measures.	Please see response to Paragraph 2.10.47 above.
Technical Considerations		
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.	A full Development Description is provided in Chapter 5 [EN010162/APP/6.2.5] and the support for BESS as associated development is acknowledged.
Capacity of a site		
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)) should be used for the purposes of determining solar site capacity.’	The Applicant’s Development is a Nationally Significant Infrastructure Project (NSIP) as the generation capacity exceeds 50 MW. The Applicant therefore seeks development consent, under the Planning Act 2008, to construct, operate, maintain and decommission a solar and biodiversity park and associated development.

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."	Degradation of the panels over time is anticipated and the impacts associated with their replacement are considered in Chapter 15 – Climate Change [EN010162/APP/6.2.15].
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.'	Chapter 5 – Development Description [EN010162/APP/6.2.5] provides tables detailing the design parameters which have been used to assess the likely significant effects of the proposal.
2.10.58	"In particular, any permissions granted on the basis of a DC installed generating capacity should be built on that basis, unless an amendment is made to that permission and the difference in impacts is considered.	The Application seeks consent for a Development with an operational life of 40 years, and the DCO secures submission of a decommissioning plan prior to the expiration of that period. A draft Requirement of the draft DCO details when the decommissioning of the authorised development must take place [EN010162/APP/3.1].
Site layout design, and appearance		
2.10.59	'Applicants should consider the criteria for good design set out in EN-1 Section 4.7 at an early stage when developing projects.'	Please see Policy Compliance Table NPS EN-1 regarding response to Section 4.7 of EN-1.
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.'	Chapter 4 – Alternatives [EN010162/APP/6.2.4] details the site selection process undertaken to identify the Development site as well as providing a description of the evolution of the Development design. The Design Approach Document [EN010162/APP/5.6] also

		provides further design related detail.
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.'	Refinements to the layout of the Development have continued, having regard to planning and environmental considerations and the objective of maximising the power output. The Design Approach Document [EN010162/APP/5.6] also provides further detail regarding design. An Illustrative Layout Plan [EN010162/APP/2.10] has been submitted with the Application. Final design details, within the parameters assessed in the ES will be submitted for approval post consent pursuant to a Requirement of the DCO.
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. 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.	Please see response to Paragraph 2.10.61 above. A south-facing arrangement has been adopted. See Design Approach Document [EN010162/APP/5.6] for further details regarding the Developments design.
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.'	Chapter 5 – Development Description [EN010162/APP/6.2.5] provides detail on the cabling which forms part of the Development, comprising Work No. 2 as defined in the DCO. No overhead cabling is proposed.
Project lifetime		
2.10.65	'Applicants should consider the design life of solar panel efficiency over time when determining the	The Application seeks consent for a Development with an operational life of 40

	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.'	years, and the DCO secures submission of a decommissioning plan prior to the expiration of that period. A Requirement has been included in the draft DCO which provides details on the decommissioning of the Development [EN010162/APP/3.1].
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.'	A temporary consent is sought, for 40 years from the commissioning of the Development. The time-limited nature of the Development will be secured via the DCO, with draft Requirement 20 of the draft DCO [EN010162/APP/3.1] providing the mechanism to secure the decommissioning of the Development.
2.10.67	Solar panel efficiency deteriorates over time and applicants may elect to replace panels during the lifetime of the site.'	The potential for replacement panels during the operational lifetime of the Development has been taken into account in the parameters assessed in the ES, particularly in relation to traffic and transport. See Chapter 14 – Traffic and Access for further details [EN010162/APP/6.2.14].
Decommissioning		
2.10.68	'Solar panels can be decommissioned relatively easily and cheaply. The nature and extent of decommissioning of a site can vary. Generally, it is expected that the panel arrays and mounting structures will be decommissioned, and underground cabling dug out to ensure that prior use of the site can continue.'	Decommissioning proposals are set out in Chapter 5 – Development Description [EN010162/APP/6.2.5]. In addition, Technical Appendix A5.6, outline Decommissioning and Restoration Plan (oDRP) [EN010162/APP/6.4.5.6] also details the decommissioning proposals. A final DRP is secured via Requirement in the draft DCO [EN010162/APP/3.1], will accord with the oDRP and be

		agreed with the relevant authorities.
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.’	Decommissioning proposals are set out in Chapter 5 – Development Description [EN010162/APP/6.2.5]. Technical Appendix 5.6, Outline Decommissioning and Restoration Plan (oDRP) [EN010162/APP/6.4.5.6] also details the decommissioning proposals. The ES has assumed the substations are to remain in situ on the basis of assessing a worst-case environmental effects scenario. A decision on their removal will be made at decommissioning stage and set out in the final DRP which will be secured via Requirement in the DCO. It is likely that access tracks and new access points would also be left in situ, although this depends on landowner preferences at that time.
Flexibility in the project details		
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; 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).’	Please see response to Paragraph 4.3.11 in NPS EN-1 in regard to the use of the Rochdale Envelope. Chapter 4 – Alternatives [EN010162/APP/6.2.4] and Chapter 5 – Development Description [EN010162/APP/6.2.5] provides detail on the project parameters. Details are also provided in the Design Approach Document [EN010162/APP/5.6]. A final design will be subject to agreement of the relevant Local Planning Authorities.
2.10.71	‘Applicants should set out a range of options based on different panel numbers, types and layout, with and without storage.’	Please see response to Paragraph 2.10.70 above.

2.10.72	'Guidance on how applicants should manage flexibility is set out at Section 2.6 of this NPS.'	Please see response to Paragraph 2.10.70 above.
Impacts		
2.10.73	The impacts identified in Part 5 of EN-1 and below, are not intended to be exhaustive.	Please see Policy Compliance Table NPS EN-1 regarding response to relevant paragraphs of Part 5 of EN-1.
2.10.74	Applicants should provide information on relevant impacts as directed by this NPS and the Secretary of State.	This is the approach taken throughout the ES.
Biodiversity, ecological, geological conservation and water management		
2.10.75	Generic environmental, biodiversity, ecology, geological and water management impacts are covered in section 4.3 (Environmental Principles), section 4.6 (Environmental and Biodiversity Net Gain), section 5.4 (Biodiversity and Geological Conservation) and section 5.8 (Flood Risk) of EN-1.	Please see Policy Compliance Table NPS EN-1 regarding response to relevant paragraphs of EN-1.
2.10.76	'The applicant's ecological assessments should identify any ecological risk from developing on the proposed site.'	A full ecology assessment is provided in Chapter 8 – Ecology and Biodiversity [EN010162/APP/6.2.8].
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.'	A full ecology assessment is provided in Chapter 8 – Ecology and Biodiversity [EN010162/APP/6.2.8]. This provides details of the surveys which have taken place. Field surveys have included; habitats and vegetation, White-Clawed Crayfish, Great Crested Newt, Reptiles, Otter, Water vole, Bats, Breeding Birds and Wintering Birds.
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	Chapter 1 – Introduction [EN010162/APP/6.2.1] provides a table of competence of the lead authors for each topic,

	hierarchy, and biodiversity enhancements are maximised.'	including an experienced Ecology and Biodiversity technical lead.
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.'	Chapter 8 – Ecology and Biodiversity [EN010162/APP/6.2.8] provides a full ecological assessment, including impacts and mitigation. All commitments are detailed within the Commitments Register [EN010162/APP/7.1] which also sets out how mitigation is to be secured.
2.10.80	'Applicants should consider earthworks associated with construction compounds, access roads and cable trenching.'	Technical Appendix A17.2 provides an outline Soils Management Plan (oSMP) [EN010162/APP/6.4.17.2] which sets out the key principles and considerations for the handling of sols during construction, operation and decommissioning of the Development. A final SMP will be developed based on detailed design, post consent, and in accordance with the oSMP. This will be submitted to Newark and Sherwood District Council for approval prior to commencement and secured via a DCO Requirement.
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 conditions for site restoration. Further details on minimising impacts on soil and soil handling are above at paragraphs 2.10.33 and 2.10.34.'	Please see response to Paragraph 2.10.80 above.
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	Details on lighting are provided in Chapter 5 – Development Description [EN010162/APP/6.2.5]. The consideration of lighting on habitats is discussed in Chapter 8 – Ecology and

	lighting is necessary, it should be minimised and directed away from areas of likely habitat.'	Biodiversity [EN010162/APP/6.2.8]. Technical Appendix A5.5, Outline Operational Environmental Management Plan (oOEMP) [EN010162/APP/6.4.5.5] provides detail regarding lighting at section A5.5.4.4 and security at section A5.5.4.5. Technical Appendix A5.3, outline Construction Environmental Management Plan (oCEMP) [EN010162/APP/6.4.5.3] provides detail such as Control of Lighting during the construction phase which will be deployed in accordance with good practice to reduce or avoid impacts on ecological receptors.
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 mammal, reptile and other fauna access into the site if required to do so in the ecological report.'	Chapter 5 – Site selection and design [EN010162/APP/6.2.5] along with the Design Approach Document [EN01016A/APP/5.6] provides relevant detail. This includes detail on the type of fencing proposed and details regarding 5m offsets from field boundaries, where there is an assumed presence of hedgerow boundaries to accommodate root protection areas, avoid other physical constraints and remove buffers around features such as open or post and wire fenced field boundaries which can be incorporated within solar areas. Technical Appendix A8.12 Aboricultural Impact Assessment [EN010162/APP/6.4.8.12] details that a total of 98 trees will be affected by the works

		(28 individual trees and 70 trees that are part of groups or partial groups) and a permanent loss of 1,308 m of hedgerows associated with fencing, accesses and new tracks/roads along with 1,908 m of hedgerow losses of a temporary nature due to cable installation. Tree and hedgerow losses will be compensated by the extensive tree planting and hedgerow and woodland creation proposed in the outline Landscape and Ecology Management Plan (oLEMP) (TA A5.1 [EN010162/APP/6.4.5.1], which includes 31 ha of new woodland creation, 8.5 ha of wood pasture creation, 50 km of species-rich hedgerow creation and scattered individual trees. Many of these features are in close proximity to potential losses with the potential to improve landscape connectivity and provide buffers for existing woodlands. A final LEMP will be secured via Requirement in the DCO and be in accordance with the oLEMP.
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 FRA has been undertaken and provided. Technical Appendix 9.1 Flood Risk Assessment [EN010162/APP/6.4.9.1] concludes that surface water run off from Work Area 1: Solar PV will be managed through RSuDS techniques such as grassland/wildflower which will act to bind soils, slow surface water and increase water quality, compared to the baseline scenario. Where Solar PV in

		Work Area 1 is located on slopes of 6% or greater, additional measures such as filters drains and berms will be implemented. The Development is therefore compliant with national and local planning policy.
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 run-off where recommended.'	The Development intends to utilise existing access tracks where possible. Technical Appendix A9.1 Flood Risk Assessment [EN010162/APP/6.4.9.1] provides detail on the use of impermeable or permeable materials, including the limited installation of impermeable surfaces within the Solar PV array to prevent a significant increase in surface water run-off.
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.'	Please see response to Paragraph 2.10.84 above.
2.10.87	'Culverting existing watercourses/drainage ditches should be avoided.'	The design of the scheme reduces as far as possible the need for culverting. Where unavoidable, design measures are incorporated to prevent impediments to flow being created to be agreed alongside the relevant drainage authorities. Further detail is provided in Chapter 9 – Water Resources [EN010162/APP/6.2.9] and Section A5.3.7.4 of Technical Appendix A5.3 outline Construction Environmental Management Plan (oCEMP) [EN010162/APP/6.4.5.3].
2.10.88	'Where culverting for access is unavoidable, applicants should demonstrate that no reasonable alternatives exist and where	The minimisation of the number of proposed watercourse crossings and the re-use of the existing

	necessary it will only be in place temporarily for the construction period.'	watercourse crossings reduces one of the main activities that could give rise to impediment flows. Further detail is provided in Chapter 9 – Water Resources [EN010162/APP/6.2.9] and section A5.3.9.5.4 of Technical Appendix A5.3, outline Construction Environmental Management Plan [EN010162/APP/6.4.5.3] provides detail on the use of culverts and their proposed design. A detailed design will be carried out prior to the construction phase, and agreed with the relevant authorities.
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.'	Substantial Biodiversity Net Gain (BNG) is incorporated into the Development design. The prevailing DEFRA metric has been used to calculate the BNG of the Development, which is proposed to deliver 60% for habitats, 26% for hedgerows and 11% for watercourses. Further details can be found in Biodiversity Net Gain [BNG] Assessment Technical Appendix A8.13 [EN010162/APP/6.4.8.13]. An outline Landscape and Ecological Management Plan (oLEMP) will act as a mechanism to record and monitor ecological data on created, or evolving habitats, during the operation of the Development [TA A5.1 EN010162/APP/6.4.5.1]. A final LEMP will be secured via Requirement in the DCO, accord with the oLEMP and be agreed with the relevant authorities prior to commencement of development.

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.'	Substantial BNG is incorporated into the Development design. The prevailing DEFRA metric has been used to calculate the BNG of the Development, which is proposed to deliver 60% for habitats, 26% for hedgerows and 11% for watercourses. Further details can be found in Biodiversity Net Gain [BNG] Assessment Technical Appendix A8.13 [EN010162/APP/6.4.8.13]. An outline Landscape and Ecological Management Plan (oLEMP) will act as a mechanism to record and monitor ecological data on created, or evolving habitats, during the operation of the Development [EN010162/APP/6.4.5.1]. A final LEMP will be secured via Requirement in the DCO, accord with the oLEMP and be agreed with the relevant authorities prior to commencement of development.
2.10.92	'Applicants should consider whether they need to provide geotechnical and hydrological information (such as identifying the presence of peat at each site) including the risk of landslide connected to any development work.'	Ground conditions are detailed in Chapter 10 [EN010162/APP/6.2.10] and accompanied by Technical Appendices A10.1 to A10.8 which provide Desk Study and Preliminary Risk Assessments [EN010162/APP/6.4.10.1 – 6.4.10.8 (inclusive)]. Soils are considered in Chapter 17 – Agricultural Land [EN010162/APP/6.2.17] and Technical Appendix A17.2 provides an outline Soils Management Plan (oSMP) [EN010162/APP/6.4.17.2] sets out the key principles and considerations for the

		handling of soils during construction, operation and decommissioning of the Development. Hydrology is considered in Chapter 9 – Water Resources [EN010162/APP/6.2.9].
Landscape, visual and residential amenity		
2.10.93	Generic landscape and visual impacts are covered in Section 5.10 of EN-1.	Please see Policy Compliance Table NPS EN-1 regarding response to relevant paragraphs of Part 5 of EN-1.
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.'	Chapter 7 – Landscape and Visual Impact Assessment [EN010162/APP/6.2.7] provides detail on the ZTV studies undertaken with Technical Appendix A7.2 providing the Landscape and Visual Impact Assessment Methodology [EN010162/APP/6.4.7.2].
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.'	As the design and layout of the Development evolved, refinements included removing solar arrays on more exposed high ground have reduced the visual effects of the Development. Chapter 7 - Landscape and Visual Impact Assessment [EN010162/APP/6.2.7] explains the conclusions and the timescales associated with the establishment of screening.
2.10.96	'Landscape and visual impacts should be considered carefully pre-application. Potential impacts on the statutory purposes of nationally designated landscapes should form a part of the pre-application process.'	Notwithstanding that the Development does not fall within any nationally designated landscapes, landscape and visual considerations have steered design approach as detailed in Chapter 7 – Landscape and Visual Impact

		Assessment [EN010162/APP/6.2.7] and site selection decisions, as detailed in Chapter 5 – Development Description [EN010162/APP/6.2.5].
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.'	An assessment of Landscape and Visual matters has been provided at Chapter 7 - Landscape and Visual Impact Assessment [EN010162/APP/6.2.7] Following consultation, a specific heritage viewpoint was undertaken. Please see Figure 11.5 VP [EN010162/APP/6.3.11.5]. A Residential Visual Amenity Assessment is provided at Technical Appendix A7.6 [EN010162/APP/6.4.7.6].
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 effort towards minimising the landscape and visual impact of solar PV arrays especially within nationally designated landscapes.'	Mitigation measures for landscape and visual effects are included within the design for the Development as described in section 7.6 of Chapter 7 – Landscape and Visual Impact Assessment [EN010162/APP/6.2.7]. In addition, the Development does not fall within any nationally designated landscapes. The Design Approach Document [EN010162/APP/5.6] also provides further detail on design related matters alongside the Concept Design Parameters and Principles Document [EN01016A/APP/7.14].
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..'	For details regarding fencing, please see Chapter 5 – Development Description [EN010162/APP/6.2.5]. The Design Approach Document outlines the approach to security fencing in Section 6.2.3 [EN010162/APP/5.6].

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.'	A landscape led approach to the layout and design of the has been adopted, maximising and reinforcing the use of existing landscape features (hedgerows, trees and woodland) when siting development, imposing appropriate buffer distances to protect existing features, proposing substantial new planting in key areas, and stripping development back from higher ground, all in order to avoid or minimise adverse impacts in visual and character terms. As detailed in Chapter 7 - Landscape and Visual Impact Assessment [EN010162/APP/6.2.7]. Root Protection Areas of trees and hedgerows are protected by the detailed design requirements outlined in Chapter 5 - Development Description [EN010162/APP/6.2.5] and the approach explained in Chapter 8 - Ecology and Biodiversity Chapter [EN010162/APP/6.2.8] Technical Appendix A5.1, outline Landscape and Ecological Management Plan (oLEMP) [EN010162/APP/6.4.5.1] and Technical Appendix A5.3 outline Construction Environmental Management Plan (oCEMP) [EN010162/APP/6.4.5.3] outlines the future maintenance provisions to protect vegetation and trees. There will be no loss of or harm to ancient woodland or veteran trees.
2.10.101	'The impact of the proposed development on established trees and hedges should be informed by a	Chapter 8 – Ecology and Biodiversity [EN010162/APP/6.2.8] and

	tree survey and arboricultural/hedge assessment as appropriate.'	Technical Appendix A8.12 Aboricultural Impact Assessment [EN010162/APP/6.4.8.12] provides detail on the arboriculture surveys undertaken to date, and any impact the Development may have on existing trees and hedgerows. Buffers are included to secure the protection of trees and hedgerows. All retained trees will be protected during construction as set out in Technical Appendix A5.3 outline Construction Environmental Management Plan (oCEMP) [EN010162/APP/6.4.5.3] a final version of which will be secured via Requirement in the DCO which will accord with the oCEMP and be agreed with the relevant authorities.
Glint and glare		
2.10.102	Solar panels are specifically designed to absorb, not reflect, irradiation. However, solar panels may reflect the sun's rays at certain angles, causing glint and glare. 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.'	A technical assessment of Glint and Glare has been provided at Technical Appendix A16.1 [EN010162/APP/6.4.16.1] which details how glint and glare effects were considered throughout the preliminary design process, to reduce the requirement for additional mitigation measures and used to inform the detailed mitigation strategy for the ES. This concludes that with typical parameters for tilt, orientation and panel type and additional mitigation, glint and glare effects would be acceptable in all cases. There will be further assessment at detailed design stage to secure that any necessary mitigation is secured.

Cultural Heritage		
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.'	Above and below ground heritage and archaeology have been assessed within Chapter 11 – Cultural Heritage and Archaeology [EN010162/APP/6.2.11]. Following the implementation of appropriate mitigation measures, no significant effects to heritage assets are anticipated.
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.	Chapter 11 – Cultural Heritage and Archaeology [EN010162/APP/6.2.11] provides an assessment of effects to heritage significant arising from change within setting and historic landscape.
2.10.109	'Below ground impacts, although generally limited, may include direct impacts on archaeological deposits through ground disturbance associated with trenching, cabling, foundations, fencing, temporary haul routes etc.'	Phase 1 and 2 Archaeological Trial Trenching has taken place and is presented in a Technical Appendices A11.6 – A11.7 [EN010162/APP/6.4.11.6 - EN010162/APP/6.4.11.7]. Chapter 11 – Cultural Heritage and Archaeology provides an overall assessment of effects [EN010162/APP/6.2.11]. The details of Archaeological fieldwork are set out in, Technical Appendix A11.8 outline Archaeological Mitigation Strategy [EN010162/APP/6.4.11.8]. This details the areas to be subject to further evaluation prior to detailed design and techniques to be used, the rationale behind selection of areas for preservation in situ or by record and the techniques applied. Additionally, an outline programme for mitigation works including post-

		excavation assessment, analysis, publication and archiving is provided.
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.'	Please see response to Paragraph 2.10.109 above.
2.10.112	'Applicant assessments should be informed by information from Historic Environment Records (HERs) or the local authority.	Chapter 11 – Cultural Heritage and Archaeology [EN010162/APP/6.2.11] alon g with the accompanying Technical Appendices have been prepared using desk-based sources, including the Nottinghamshire Historic Environment Record as confirmed in the Chapter.
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.'	Please see response to Paragraph 2.10.109 above.
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.'	Phase 1 and 2 Archaeological Trial Trenching has taken place and is presented in a Technical Appendices A11.6 – A11.7 [EN010162/APP/6.4.11.6 - EN010162/APP/6.4.11.7]. This in turn has informed the approach taken in the ES. Chapter 11 – Cultural Heritage and Archaeology [EN010162/APP/6.2.11] prov ides further detail.

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.'	Please see response to Paragraph 2.10.114 above.
2.10.116	'Applicants should take account of the results of historic environment assessments in their design proposal.'	Chapter 11 – Cultural Heritage and Archaeology [EN010162/APP/6.2.11] confirms that following the implementation of appropriate mitigation measures, there are no significant effects to above ground heritage assets. Minor adverse or negligible effects on archaeological remains, have been reported once mitigation has taken place. No significant effects are reported to heritage assets arising from change within their setting, leading to a reduction in their significance.
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.'	Chapter 11 – Cultural Heritage and Archaeology [EN010162/APP/6.2.11] confirms that following the implementation of appropriate mitigation measures, no significant effects to above ground heritage assets are anticipated. Minor adverse or negligible effects on archaeological remains have been reported once mitigation has taken place. No significant effects are reported to heritage assets arising from change within their setting, leading to a reduction in their significance.
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	Please see response to Paragraph 2.10.116 above.

	scale, design, and prominence, may cause substantial harm to the significance of the asset.'	
2.10.119	'Applicants may need to include visualisations to demonstrate the effects of a proposed solar farm on the setting of heritage assets.'	Following consultation, a specific heritage viewpoint was undertaken. Please see Figure 11.5 VP [EN010162/APP/6.3.11.5] and informs the reporting in the chapter.
Construction including traffic and transport noise and vibration		
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.	From the outset, detailed consideration has been given to vehicular access requirements for construction and operation. In terms of access, the construction phase includes the preparation of the land and construction compounds, installing access tracks. A Construction Traffic Management Plan (CTMP) will manage and minimise the effect of the construction phase on the highway network, local residents and other sensitive receptors such as schools. Technical Appendix A5.2 outline Construction Traffic Management Plan (oCTMP) [EN010162/APP/6.4.5.2] has been submitted with the Application. Regarding Abnormal Indivisible Loads (AILs), these will be delivered under Special Types General Order (STGO) Regulations with access to be from the nearest known heavy load routes. For further information, see Technical Appendix A14.1 Transport Statement [EN010162/APP/6.4.14.1] and Figure 14.7 Abnormal Load Routes

		[EN010162/APP/6.3.14.7] which presents the proposed routes to be used for AIL deliveries. Movements will be managed so potential effects are mitigated accordingly. This may include police escort, temporary localised road closures and plating and packing of kerbs to avoid damage. Further details are provided in Technical Appendix A5.2 outline Construction Traffic Management Plan (oCTMP) [EN010162/APP/6.4.5.2].
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 farms 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.'	Chapter 14 – Traffic and Access [EN010162/APP/6.2.14] has assessed the traffic and transportation effects of the Development. The chapter details the assumptions on which assessment is based, including construction routes for use throughout the construction phase. No significant adverse effects are predicted and Technical Appendix A5.2 outline Construction Traffic Management Plan (oCTMP) [EN010162/APP/6.4.5.2] has been submitted with the application which secures the identified mitigation measures. A final version will be secured by Requirement of the Draft DCO [EN010162/APP/3.1] and agreed with the Highways Authority. The application is also supported by a Traffic Regulation Measures Plan [EN010162/APP/2.13].
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	Please see response to Paragraph 2.10.121 above.

	application and select the route that is the most appropriate.'	
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.'	Please see response to Paragraph 2.10.121 above.
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.'	Regarding AILs, these will be delivered under STGO Regulations with access to be from the nearest known heavy load routes. For further information, see Technical Appendix A14.1 Transport Statement [EN010162/APP/6.4.14.1] and Figure 14.7 Abnormal Load Routes [EN010162/APP/6.3.14.7] which presents the routes to be used for AIL deliveries. Movements will be managed so potential effects are mitigated accordingly including the avoidance of narrow bridges where possible. This may include police escort, temporary localised road closures and plating and packing of kerbs to avoid damage. Further details are provided in Technical Appendix A5.2 outline Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2].
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 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	The approach to cumulative effects assessment and interrelationships is provided in Chapter 2 – Environmental Impact Assessment [EN010162/APP/6.2.2]. A cumulative effects assessment has been undertaken in Chapter 14 – Traffic and Access [EN010162/APP/6.2.14].

	question in combination with those from any other relevant development. Consultation with the relevant local highways authorities is likely to be necessary.'	Cumulative traffic effects have been assessed as being not significant. Traffic movements through the construction phase have been considered in Technical Appendix A5.2, outline Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2]. A final version of the CTMP will be secured by Requirement, and will be agreed with the Highways Authority. Nottinghamshire County Council, as the Highways Authority have been consulted with throughout the pre-application phase. Further detail regarding this can be found in the Consultation Report [EN010162/APP/5.1]. The Application is also supported by a Traffic Regulation Measures Plan [EN010162/APP/2.13].
Mitigations – Agriculture Land classification and land type		
2.10.127	"The Defra Construction code of practice for the sustainable use of soils on construction sites provides guidance on ensuring that damage to soil during construction is mitigated and minimised. Mitigation measures focus on minimising damage to soil that remains in place, and minimising damage to soil being excavated and stockpiled. The measures aim to preserve soil health and soil structure to minimise soil carbon loss and maintain water infiltration and soil biodiversity. Mitigation measures for agricultural soils include use of green cover, multispecies cover crops - especially during the winter-minimising compaction and adding soil organic matter."	Technical Appendix A17.2 provides an outline Soils Management Plan (oSMP) [EN010162/APP/6.4.17.2] sets out the key principles and considerations for the handling of sols during construction, operation and decommissioning of the Development. A final Soil Management Plan (SMP) will be developed based on detailed design, post consent, and in accordance with the oSMP. This will be submitted to Newark and Sherwood District Council for approval prior to commencement and secured via a DCO requirement.

Biodiversity and ecological conservation		
2.10.128	In England, proposed enhancements should take account of the above factors and as set out in Sections 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 in Technical Appendix A8.13, Biodiversity Net Gain [BNG] Assessment [EN010162/APP/6.4.8.13], the following results have been established: 60% habitat gain 26% hedgerow gain 11% watercourse gain
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.	Technical Appendix A8.13, Biodiversity Net Gain [BNG] Assessment [EN010162/APP/6.4.8.13] and the outline Landscape and Ecological Management Plan (LEMP; TA A5.1 [EN010162/APP/6.4.5.1] and accompanying figures describe and show the post-development habitats and how the BNG has been achieved.
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.	The Outline Landscape and Ecological Management Plan (LEMP; TA A5.1 [EN010162/APP/6.4.5.1] provides details on ecological monitoring throughout the lifetime of the Development. A final LEMP will be secured via Requirement in the DCO.
Landscape, visual and residential amenity		
2.10.131	Applicants should consider the potential to mitigate landscape and visual impacts through, for example, screening with native hedges, trees and woodlands.	Significant tree and hedgerow planting is proposed across the Development which will aide in mitigating landscape and visual impacts whilst also having a positive impact on biodiversity. This includes 31 ha of new woodland, 22 ha of woodland ecotone and 50 km

		of new species-rich hedgerows.
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.	Chapter 5 – Development Description [EN010162/APP/6.2.5] provides full details on Fencing and Security Measures
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.	Please see response to Paragraphs 2.10.46 and 2.10.47 above.
Glint and glare		
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.	Whilst the Development will be subject to detailed design post consent, it is typical for panels to be coated with a standard anti-reflective coating and fixed at a tilted angle, for maximum reflection attenuation. Chapter 5 – Development Description [EN010162/APP/6.2.5] provides further detail and Technical Appendix A16.1 Glint and Glare Assessment [EN010162/APP/6.4.16.1] details the assumptions made for the assessment, including anti-reflective coating and angle tilt.
2.10.135	Applicants may consider using screening between potentially affected receptors and the reflecting panels to mitigate the effects.	Significant tree and hedgerow planting is proposed across the Development which will aide in mitigating landscape and visual impacts whilst also having a positive impact on biodiversity. This includes 31 ha of new woodland, 22 ha of woodland ecotone and 50 km of new species-rich hedgerows. Screening is considered further in Chapter 7 – Landscape and Visual

		Impact Assessment [EN010162/APP/6.2.7].
2.10.136	Applicants may consider adjusting the azimuth alignment of, or changing the elevation tilt angle of, a solar panel within the economically viable range, to alter the angle of incidence. In practice this is unlikely to remove the potential impact altogether but in marginal cases may contribute to a mitigation strategy.	Chapter 5 – Development Description [EN010162/APP/6.2.5] provides further detail and Technical Appendix A16.1 Glint and Glare Assessment [EN010162/APP/6.4.16.1] details the assumptions made for the assessment, including anti-reflective coating and angle tilt. The Development will be subject to detailed design, post consent.
Cultural Heritage		
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.	Careful routing of the cable route and siting of the proposed solar array areas, compounds, substations and BESS to avoid or minimise impacts to key areas of archaeological sensitivity based upon the results of the Archaeological Desk-Based Assessment, geophysical survey and trial trenching completed to date. Areas where archaeological remains have been avoided as part of the design will be preserved in situ.
Construction including traffic and transport noise and vibration		
2.10.139	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.	Technical Appendix A5.2 Outline Construction Traffic Management Plan (oCTMP) [EN010162/APP/6.4.5.2] has been submitted with the Application and provides a framework for the management of construction vehicle movements to and from the Development within the Study Area set out in

		Chapter 14 – Traffic and Access [EN010162/APP/6.2.14] to ensure that the construction phase can be undertaken in a safe and efficient manner and disruption to the local highway network is minimal. A final CTMP, which accords with the oCTMP, will be developed based on detailed design and agreed with the relevant authorities. The provision for a final CTMP will be secured by DCO requirement.
2.10.140	Where the Secretary of State agrees that this is necessary, requirements could be imposed on development consent.	Please see response to Paragraph 2.10.139 above.
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 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.	Table 14.23 of Chapter 14 – Traffic and Access [EN010162/APP/6.2.14] provides detail regarding cumulative development traffic generation review. Cumulative traffic effects are assessed as being not significant. Please see response to Paragraph 2.10.139 above regarding the oCTMP and CTMP.
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.	Section 5.2.6 of the oCTMP provides detail on how abnormal loads will be dealt with. Please see response to Paragraph 2.10.139 for further detail on the oCTMP and final CTMP.
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	Please see response to Paragraph 2.10.139 above. It is expected that the Development will enter into a Development Consent Obligation.

	appropriate measures, including restoration of roads and verges.	
Secretary of State decision making – factors influencing site selection and design		
Agriculture land classification and land type		
2.10.145	“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.”	Technical Appendix A17.2 provides an Outline Soil Management Plan (oSMP) [EN010162/APP/6.4.17.2] sets out the key principles and considerations for the handling of sols during construction, operation and decommissioning of the Development. A final Soil Management Plan (SMP) will be developed based on detailed design, post consent, and in accordance with the oSMP. This will be submitted to Newark and Sherwood District Council for approval prior to commencement and secured via a DCO requirement.
Secretary of State decision making		
Factors influencing site selection and design		
Agriculture land classification and land type		
2.10.145	‘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.’	Chapter 17 – Agricultural Land [EN010162/APP/6.2.17] assesses the effects of the Development on BMV. Technical Appendix A17.2 provides an Outline Soil Management Plan (oSMP) [EN010162/APP/6.4.17.2] sets out the key principles and considerations for the handling of sols during construction, operation and decommissioning of the Development. A final SMP will be secured via Requirement in the draft DCO [EN010162/APP/3.1] which will be agreed with the relevant authorities and accord with the oSMP.

		It is anticipated there will be a medium adverse effect from the temporary loss of BMV soils for the lifetime of the Development, however this can be fully restored at decommissioning.
Technical Considerations		
2.10.146	'The Secretary of State should ensure that the applicant has put forward outline plans for decommissioning the generating station when no longer in use and restoring the land to a suitable use (taking into account paragraphs 2.10.68 and 2.10.69)'	Decommissioning proposals are set out in Chapter 5 – Development Description [EN010162/APP/6.2.5]. In addition, Technical Appendix A5.6, Outline Decommissioning and Restoration Plan [EN010162/APP/6.4.5.6] also details the decommissioning proposals, secured via a Requirement.
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.'	Requirement 20 of the draft Development Consent Order [EN010162/APP/3.1] provides detail regarding the time-limits starting from the date at which the Development is commissioned, however also takes account of the possibility of the first phase being commissioned prior to the completion of construction of a later phase.
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.'	The Application includes Technical Appendix A5.6 Outline Decommissioning and Restoration Plan (DRP) [EN010162/APP/6.4.5.6], a final version of which is secured by a Requirement in the draft DCO [EN010162/APP/3.1]. The final DRP is required to be implemented as approved.
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.'	The operational life of the Development is expected to be 40 years as confirmed in Chapter 5 - Development Description [EN010162/APP/6.2.5]. See

		response to Paragraph 2.10.147 above.
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.	The consent sought is temporary as the Application seeks consent for a Development with an operational life of 40 years, and the DCO secures submission of a decommissioning plan prior to the expiration of that period. Therefore, the environmental effects will primarily be temporary as assessed throughout the ES.
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.'	The relevant chapters of the ES have considered these effects, which have also been considered in the Planning Statement [EN010162/APP/5.4].
Impacts		
2.10.152 – 2.10.153	'The impacts identified in Part 5 of EN-1 and below, are not intended to be exhaustive.' 'The Secretary of State should consider any impacts which it determines are relevant and important to its decision.'	It is considered that all relevant impacts and likely significant effects have been assessed and reported in the ES for the purposes of the submission.
Biodiversity, ecological, geological conservation and water management		
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.'	Chapter 8 – Ecology and Biodiversity [EN010162/APP/6.2.8] explains how a reduction in intensive agricultural land and associated use of pesticides and fertilisers will positively impact biodiversity and habitats.

2.10.155	'The Secretary of State must consider the worst-case effects in its consideration of the application and consent.'	The ES has assessed the likely worst case effects arising from the development based on the Rochdale Envelope approach. See Chapter 2 – Environmental Impact Assessment [EN010162/APP/6.2.2] for detail on the approach taken in the Environmental Statement.
2.10.156	Where developments are proposed on peat, to ensure the development will result in minimal disruption to the ecology, or release of CO2, and that the carbon balance savings of the scheme are maximised, the Secretary of State should be satisfied that the solar farm layout and construction methods have been designed to minimise soil disturbance during construction and maintenance of roads, tracks, and other infrastructure and in England should take into account the policies set out in the England Peat Action Plan 2021 ....'	No peat is present across the Development site.
Landscape, visual and residential amenity		
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.'	Chapter 7 – Landscape and Visual Impact Assessment [EN010162/APP/6.2.7] has assessed the effect on landscape character, visual receptors, and designated areas during construction and early operation, operation and decommissioning and decommissioning. Night-time effects, cumulative effects and effects on Residential Visual Amenity have also been assessed. Chapter 7 further confirms there are no designated landscapes in the LVIA Study Area.
Glint and glare		
2.10.158	'Solar PV panels are designed to absorb, not reflect, irradiation.	Technical Appendix A16.1 provides a Glint and Glare

	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).'	Assessment [EN010162/APP/6.4.16.1] which details how glint and glare effects were considered throughout the preliminary design process, to reduce the requirement for additional mitigation measures and used to inform the detailed mitigation strategy for the ES.
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.'	Please see response to Paragraph 2.10.158 above.
Cultural Heritage		
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 impacts of any indirect effect on the historic environment, such as effects on the setting of designated heritage assets.'	A temporary consent is sought, which is to be secured via Requirement with the majority of the infrastructure decommissioned at the end of the operational life of the Development. All topic chapters within the ES have taken this into account, including Chapter 11 – Cultural Heritage and Archaeology [EN010162/APP/6.2.11] when reporting on relevant effects. In the context of indirect effects, Chapter 11 concludes no significant effects to heritage assets arising from change within their setting leading to a reduction in significance have been

		identified. Technical Appendix A11.2, Heritage Settings Assessment Scoping [EN010162/APP/6.4.11.2] provides the Heritage Settings Assessment.
Construction including traffic and transport noise and vibration		
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 replace machine components, this may generate heavier commercial vehicle movements, but these are likely to be infrequent.’	During the operational phase, vehicle movements will general be negligible. There may be some instances where panels require replacement, however this is not anticipated to give rise to a significant effect as concluded in Chapter 14 - Traffic and Access [EN010162/APP/6.2.14]. Chapter 15 - Climate Change [EN010162/APP/6.2.15] considers this from a Climate Change perspective. Technical Appendix A5.5, Outline Operation Environmental Management Plan [EN010162/APP/6.4.5.5] contains provisions for the operational stage
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.’	None of the effects associated with traffic movements during the lifetime of the Development are considered to lead to significant effects on environmental receptors.

4 NATIONAL POLICY STATEMENT FOR ELECTRICITY NETWORKS INFRASTRUCTURE (NPS EN-5)

10 The purpose of the Policy Compliance Tables is to outline the main Policy considerations that are relevant to the Development, as described in the Application and to demonstrate compliance with Policy. Not all Sections of NPS EN-5 are applicable to the Development of a Solar and Biodiversity Park and the tables outline those which are considered relevant in the preparation of the Application, noting that the site is entirely onshore and a significant distance from the Coast. The site is located entirely in the Countryside and outside of the Defined Green Belt. The Policy Compliance Tables cross reference to the relevant Documents/Reports.

Paragraph	Details	Comments
Introduction		
2.1.4	'Decommissioning of electricity networks is not specifically covered in this NPS. Generally, nationally significant electricity networks are likely to have an ongoing function, but will be subject to maintenance, reinforcement works and for assets to be replaced when they come to the end of their lifespan.'	Chapter 5 – Development Description [EN010162/APP/6.2.5] assumes that the 4 Intermediary substations will remain in situ following decommissioning of the other elements of the Development. Technical Appendix 5.6, Outline Decommissioning and Restoration Plan [EN010162/APP/6.4.5.6] has been prepared for the Development and provides further details.
2.1.5	'As stated in Section 4.2 of EN-1, to support the urgent need for new low carbon infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as substations, are considered to be CNP infrastructure ....'	This is noted and reflected in the Planning Statement [EN010162/APP/5.4]. The Applicant is proposing associated electrical infrastructure to enable connection to the NGET substation; this infrastructure will attract CNP status in policy terms. The proposed development comprises four intermediate substations, one main substation and a Battery Storage System Area.
2.1.6	'The assessment principles outlined in Section 4 of EN-1 continue to apply to CNP infrastructure. Applicants must show how any likely	The Environmental Statement [EN010162/APP/6] submitted details the methodologies and outcomes of any likely

	significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy. Early application of the mitigation hierarchy is strongly encouraged, as is engagement with key stakeholders including SNCBs, both before and at the formal pre-application stage'	significant effects arising as a result of the proposed development for all relevant technical consideration matters.
Factors influencing site selection and design		
2.2.1	'The Secretary of State should bear in mind that the initiating and terminating points – or development zone – of new electricity networks infrastructure is not substantially within the control of the applicant.'	In the case of the Development, the main factor is the acceptance of the Development to connect to the National Grid at Staythorpe substation as detailed in Chapter 5 – Development Description [EN010162/APP/6.2.5] Chapter 4 – Alternatives [EN010162/APP/6.2.4] provides further information. The Grid Connection Statement [EN010162/APP/7.15] also provides further detail.
2.2.2	'Siting is determined by: • the location of new generating stations or other infrastructure requiring connection to the network, and/or • system capacity and resilience requirements determined by the Electricity System Operator.'	Please see the response to Paragraph 2.2.1 above.
2.2.3	'These twin constraints, coupled with the government's legislative commitment to net zero by 2050, strategic commitment to new interconnectors with neighbouring North Seas countries and an ambition of up to 50GW of offshore wind generation by 2030, means that very significant amounts of new electricity networks infrastructure is required, including in areas with comparatively little build-out to date.'	This is noted. The Development proposes to connect into the existing substation associated with the neighbouring consented BESS (22/01840/FULM) as this allows for a shared connection, which is efficient and cost effective. Two alternative connection options are proposed and both of these options are assessed within the draft DCO to allow for flexibility. Further detail is provided in Chapter 5 –

		Development Description [EN010162/APP/6.2.5].
2.2.4	'However, a strategic and holistic approach to onshore and offshore network planning, as set out in paragraphs 2.7 – 2.8, will identify the most efficient way of meeting decarbonisation targets and should reduce the overall amount of network infrastructure required.'	This is noted. The Development proposes to connect into the existing substation associated with the consented BESS (22/01840/FULM) as this allows for a shared connection, which is efficient and cost effective. As noted above, optionality is retained in this regard. Further detail is provided in Chapter 5 – Development Description [EN010162/APP/6.2.5].
2.2.5	'Additionally, applicants retain control in managing the identification of routing and site selection between the identified initiating and terminating points or within the development zone.'	The starting point for site selection was the acceptance of the application to connect the Development to the National Grid at Staythorpe. Following this, an initial search area within a 15km radius was identified with greater distances increasing the environmental effects, and reduced efficiencies in terms of electrical transmission to the Grid. The area south and east of the A1 and River Trent were also excluded due to multiple environmental factors. Once the proposed Order Limits area had been identified, the project design principles, environmental factors, physical constraints to solar development and development considerations informed the site selection process. Chapter 4 – Alternatives [EN010162/APP/6.2.4] provides greater detail on the site selection process and consideration of alternatives.

		The Design Approach Document [EN010162/APP/5.6] provides the design principles and approach to the Development.
2.2.6	'Moreover, the locational constraints identified above do not, of course, exempt applicants from their duty to consider and balance the site-selection considerations set out below, much less the policies on good design and impact mitigation detailed in sections 2.4-2.9.'	Details relating to site selection are provided in Chapter 4 – Alternatives [EN010162/APP/6.2.4].
2.2.7	'The connection between the initiating and terminating points of a proposed new electricity line will often not be via the most direct route. Siting constraints, such as engineering, environmental or community considerations will be important in determining a feasible route.'	The starting point for site selection was the acceptance of the application to connect the Development to the National Grid at Staythorpe. Once the search area had been identified, the project design principles, environmental factors, physical constraints to solar development and development considerations informed the site selection process. Details relating to site selection are provided in Chapter 4– Alternatives [EN010162/APP/6.2.4].
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.'	Please see response to Paragraph 2.2.7 above. The Applicant has sought to avoid or reduce any adverse effects, in the siting of the electrical infrastructure. The detailed design of the above ground infrastructure will be subject to approval from the relevant local planning authority, within the established design parameters which informed the EIA.
2.2.9	'In particular, the applicant should consider such characteristics as the local topography, the possibilities for screening of the infrastructure and/or	Relevant characteristics are assessed in the topic chapters and mitigation measures are described in

	other options to mitigate any impacts. (See Section 2.10 below and Section 5.10 in EN-1.)'	the Commitments Register [EN010162/APP/7.1].
Climate Change Adaption and Resilience		
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.'	Climate change effects have been assessed within Chapter 15 – Climate Change [EN010162/APP/6.2.15]. Technical Appendix 9.1, Flood Risk Assessment and Outline Drainage Strategy [EN010162/APP/6.4.9.1] provides details on any potential increase in flood risk, and concludes that the risk of the Development flooding from all sources is Low to Negligible and non-significant.
2.33	'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). Consideration should also be given to coastal change (see sections 5.6 in EN1).'	Climate change effects have been assessed within Chapter 15 – Climate Change [EN010162/APP/6.2.15]. Technical Appendix 9.1, Flood Risk Assessment and Outline Drainage Strategy [EN010162/APP/6.4.9.1] provides details on any potential increase in flood risk, and concludes that the risk of the Development flooding from all sources is Low to Negligible and non-significant.

Consideration of good design for energy infrastructure		
2.4.2	‘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.’	The design of above ground electrical infrastructure will be the subject of detail approval by the relevant planning authority, secured via Requirements within the DCO; a Draft DCO has been submitted with the application [EN010162/APP/3.1]. The final design will be subject to safety and engineering requirements. Cables installed below ground will be restored shortly after installation.
2.4.4	‘While the above principles should govern the design of an electricity networks infrastructure application to the fullest possible extent – including in its avoidance and/or mitigation of potential adverse impacts (particularly those detailed in Sections 2.9 below) – the functional performance of the infrastructure in respect of security of supply and public and occupational safety must not thereby be threatened.’	Please see response to Paragraph 2.4.3 above.
Environmental and Biodiversity Net Gain		
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	The Developments contribution to environmental and biodiversity net gain forms part of Chapter 8 – Ecology and Biodiversity [EN010162/APP/6.2.8]. Technical Appendix 8.13, BNG Assessment [EN010162/APP/6.4.8.13] confirms a significant BNG has been achieved, despite not currently being a statutory requirement for NSIPs. Technical Appendix 5.1, Outline Landscape Ecological Management Plan (LEMP) [EN010162/APP/6.4.5.1] details, inter alia, the habitat management and monitoring

	in tandem with environmental enhancements.'	across the Development, provide detail on the delivery of ecological mitigation, compensation and enhancement. In addition, Technical Appendix 5.3, Outline Construction Environmental Management Plan (CEMP) [EN010162/APP/6.4.5.3] and Technical Appendix 5.5, Outline Operational Ecological Management Plan (OEMP) [EN010162/APP/6.4.5.5] also set out the measures to avoid or reduce the risk of adverse environmental effects during construction and operation. Additionally, the provision of permissive paths ensures that connectivity is facilitated.
Land Rights and Land Interests		
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: i. 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 Book of Reference [EN010162/APP/4.3] details land ownership and rights within the Order Limits. A Pre-application Land and Rights Negotiations Tracker [EN010162/APP/4.4] has also been submitted with the application. It can be seen from that Tracker that the Applicant has successfully secured voluntary agreements with the majority of landowners within Order Limits, and that it expects to complete remaining agreements during the course of the examination. Compulsory acquisition powers are sought in the Draft DCO [EN010162/APP/3.1] to ensure that there are no outstanding land interests which could prejudice delivery of the Development.

2.6.2	'Where the applicant does not own or wish to own the land in question, it should try to reach a voluntary agreement giving it sufficient rights and/or permissions to undertake the relevant work.'	Voluntary agreements have been sought across the Development. Details are provided within the Book of Reference [EN010162/APP/4.3] and the Pre-application Land and Rights Negotiations Tracker [EN010162/APP/4.4] as explained in the response to paragraph 2.6.1 above.
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.'	Voluntary agreements have been sought across the Development. Details are provided within the Book of Reference [EN010162/APP/4.3] and the Pre-application Land and Rights Negotiations Tracker [EN010162/APP/4.4]. In addition, compulsory purchase powers are included in the Draft DCO [EN010162/APP/3.1] and the Application is accompanied by a Statement of Reasons EN010162/APP/4.1] which explains the justification and need for those powers.
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.'	As explained in paragraphs 2.6.1 and 2.6.4 above, compulsory purchase powers are included in the Draft DCO [EN010162/APP/3.1].
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 consider any such application under the	Compulsory purchase powers are set out in the Draft DCO [EN010162/APP/3.1].

	provisions of the Planning Act 2008 and any associated guidance	
Applicant Assessment		
Biodiversity and Geological Conservation		
2.9.3	‘Electricity networks infrastructure pose a particular potential risk to birdlife including large birds, such as swans and geese, and perching birds. These may collide with overhead lines and risk being electrocuted. Large birds may also be electrocuted when landing or taking off by completing an electric circuit between live and ground wires. Even perching birds can be killed as soon as their wings touch energised parts of the infrastructure.’	Technical Appendix 8.5, Wintering Birds Baseline [EN010162/APP/6.4.8.5] and Technical Appendices 4.8, Breeding Birds Baseline [EN010162/APP/6.4.8.4] has been established and informed the ES. Impacts on breeding and wintering birds have been considered in Chapter 8 – Ecology and Biodiversity [EN010162/APP/6.2.8] and concludes that no significant effects are predicted in regard to wintering birds through all stages of the Development and no significant effects found on breeding birds during construction and decommissioning. During operation, the effects on skylark population is likely to be beneficial, although not significant, whilst the effects on the remainder of the breeding bird assemblage will be beneficial and significant at the Local scale.
2.9.6	‘Particular consideration should be given to feeding and hunting grounds, migration corridors and breeding grounds, where they are functionally linked to sites designated or allocated under the ‘national site network’ provisions of the Conservation of Habitats and Species Regulations.’	Where relevant, impacts upon feeding and hunting grounds, migration corridors and breeding grounds have been considered within Chapter 8 – Ecology and Biodiversity [EN010162/APP/6.2.8].
Landscape and Visual Impact		
2.9.7	‘While the government does not believe that the development of overhead lines is incompatible in principle with applicants’ statutory duty under Schedule 9 to the	Chapter 7 – Landscape and Visual Impact Assessment [EN010162/APP/6.2.7] considers landscape and

	Electricity Act 1989, to have regard to visual and landscape amenity and to reasonably mitigate possible impacts thereon, in practice new overhead lines can give rise to adverse landscape and visual impacts.'	visual impacts of the Development and concludes that after decommissioning, no significant effects remain.
2.9.8	'These impacts depend on the type (for example, whether lines are supported by towers or monopole structures), scale, siting, and degree of screening of the lines, as well as the characteristics of the landscape and local environment through which they are routed.'	Please see response to Paragraph 2.9.7 above.
2.9.9	'New substations, sealing end compounds (including terminal towers), and other above-ground installations that serve as connection, switching, and voltage transformation points on the electricity network may also give rise to adverse landscape and visual impacts.'	Chapter 7 – Landscape and Visual Impact Assessment [EN010162/APP/6.2.7], provides a full assessment of the likely significant effects of the Development, including the proposed substations. This concludes that after decommissioning, no significant effects remain.
2.9.10	'Cumulative adverse landscape, seascape and visual impacts may arise where new overhead lines are required along with other related developments such as substations, wind farms, and/or other new sources of generation.'	The approach to cumulative assessment is detailed within Chapter 2 – Environmental Impact Assessment (EIA) [EN010162/APP/6.2.2]. The Cumulative Effects Assessment, which forms part of Chapter 7 – Landscape and Visual Impact Assessment [EN010162/APP/6.2.7] includes existing development and consented developments which are expected to be completed and concludes that if Kelham solar farm were present, the effects of the Development would be slightly reduced in the area immediately northeast and east and in views from Micklebarrow Hill. These reductions would be limited in both extent and degree and would not be

		sufficient to alter the magnitude of impact or level of effects previously summarised in the chapter. Please refer to Figure 7.8 Cumulative Effects with One Earth Solar Farm [EN010162/APP/6.3.7.8], Figure 7.9 Cumulative Effects with Foxholes Solar Farm [EN010162/APP/6.3.7.9], and Figure 7.10 Cumulative Effects with Kelham Solar Farm and SSE BESS [EN010162/APP/6.3.7.10].
2.9.11	'Landscape and visual benefits may arise through the reconfiguration, rationalisation, or undergrounding of existing electricity network infrastructure. Though mitigation of the landscape and visual impacts arising from overhead lines and their associated infrastructure is usually possible, it may not always be so, and the impossibility of full mitigation in these cases does not countermand the need for overhead lines.'	Commitments are provided in the Commitments Register [EN010162/APP/7.1].
2.9.12	'However, in nationally designated landscapes (for instance, National Parks, The Broads and Areas of Outstanding Natural Beauty) even residual impacts may well make an overhead line proposal unacceptable in planning terms. (See Section 2.9.20 below for guidance on this case.)'	The Development is not located within a national designated landscape.
2.9.13	'Where possible, applicants should ensure that the principles detailed in Sections 2.11.16-2.11.19 below are embodied in the design of their proposed overhead line route and its associated infrastructure. Applicants should also offer proposals (for instance those detailed in Section 2.10 below) for additional mitigation.'	Commitments are secured via the Commitments Register [EN010162/APP/7.1].
Undergrounding and subsea cables		

2.9.20	'Although it is the government's position that overhead lines should be the strong starting presumption for electricity networks developments in general, this presumption is reversed when proposed developments will cross part of a nationally designated landscape (i.e. National Park, The Broads, or Area of Outstanding Natural Beauty).'	The Development is not located within a nationally designated landscape, nor are any overhead lines proposed as part of the Development. It may be possible for some of the existing above-ground wooden-pole lines may be re-routed around the edges of fields, or underground. Cable laying activity, where cables are undergrounded, will not give rise to more than negligible visual effects, as detailed within the Chapter 7 – Landscape and Visual Impact Assessment [EN010162/APP/6.2.7].
2.9.21	'In these areas, and where harm to the landscape, visual amenity and natural beauty of these areas cannot feasibly be avoided by re-routing overhead lines, the strong starting presumption will be that the applicant should underground the relevant section of the line.'	Please see response to Paragraph 2.9.20 above.
2.9.22	'However, undergrounding will not be required where it is infeasible in engineering terms, or where the harm that it causes (see section 2.11.4) is not outweighed by its corresponding landscape, visual amenity and natural beauty benefits. Regardless of the option, the scheme through its design, delivery, and operation, should seek to further the statutory purposes of the designated landscape. These enhancements may go beyond the mitigation measures needed to minimise the adverse effects of the scheme.'	Please see response to Paragraph 2.9.20 above.

2.9.23	'Additionally, cases will arise where – though no part of the proposed development crosses a designated landscape – a high potential for widespread and significant adverse landscape and/or visual impacts along certain sections of its route may result in recommendations to use undergrounding for relevant segments of the line or alternatively consideration of using a route including subsea cabling.'	Please see response to Paragraph 2.9.20 above.
2.9.24	'In these cases, and taking account of the fact that the government has not laid down any further rule on the circumstances requiring use of underground or subsea cables, the Secretary of State must weigh the feasibility, cost, and any harm of the undergrounding or subsea option against: • the adverse implications of the overhead line proposal; • the cost and feasibility of re-routing overhead lines or mitigation proposals for the relevant line section; and • the cost and feasibility of the reconfiguration, rationalisation, and/or use of underground or subsea cabling of proximate existing or proposed electricity networks infrastructure.'	Please see response to Paragraph 2.9.20 above.
2.9.25	In such cases the Secretary of State should only grant development consent for underground or subsea sections of a proposed line over an overhead alternative if they are satisfied that the benefits accruing from the former proposal clearly outweigh any extra economic, social, or environmental impacts that it presents, the mitigation hierarchy has been followed, and that any technical obstacles associated with it are surmountable. In this context it should consider: • the landscape and visual baseline characteristics of the	Please see response to Paragraph 2.9.20 above.

	setting of the proposed route, in particular, the impact on high sensitivity visual receptors (as defined in the current edition of the Landscape Institute's Guidelines for Landscape and Visual Impact Assessment), residential areas, designated landscapes, valued landscapes, designated heritage assets and Heritage Coasts (including, where relevant, impacts on the setting of designated features and areas), noting the policy in EN-1 section 5.4.53 on regional and local designations; • the additional cost of the proposed underground or sub-sea alternatives, including their significantly higher lifetime cost of repair and later uprating; • the potentially very disruptive effects of undergrounding on local communities, habitats, archaeological and heritage assets, marine environments, soil (including peat soils), hydrology, geology, and, for a substantial time after construction, landscape and visual amenity. (Undergrounding an overhead line will mean digging a trench along the length of the route, and so such works will often be disruptive – albeit temporarily – to the receptors listed above than would an overhead line of equivalent rating); • the potentially very disruptive effects of subsea cables on the seabed and the species that live in and on it, including physical damage to and full loss of seabed habitats. Cable protection can also be required where cables cross each other, or where they cannot be buried deep enough to protect them from becoming exposed. Such protection causes additional impacts that are often greater than those of the cable	

	itself due to the large areas covered. There can also be issues where subsea cables make landfall, as much coastal land is protected habitat with environmental and heritage designations and landfall connections could cause additional disruption to coastal communities and the environment; • the applicant's commitment, as set out in their ES, to mitigate the potential detrimental effects of undergrounding works on any relevant agricultural land and soils (including peat soils), particularly regarding Best and Most Versatile land, including development and implementation of a Soil Resources and Management Plan. Such a commitment must guarantee appropriate handling of soil, backfilling, and return of the land to the baseline Agricultural Land Classification (ALC), thus ensuring no loss or degradation of agricultural land. Such a commitment should be based on soil and ALC surveys in line with the 1988 ALC criteria and due consideration of the Defra Construction Code of Practice for Sustainable Use of Soils on Construction Sites.'	
Noise and Vibration		
2.9.26	'All high voltage transmission lines have the potential to generate noise under certain conditions.'	Where relevant, noise and vibration has been assessed in Chapter 12 – Noise and Vibration [EN010162/APP/6.2.12]. In addition, the application has been submitted alongside Technical Appendix 2.1, Noise Survey [EN010162/APP/6.4.12.1] and Technical Appendix 12.2, Noise and Vibration Modelling [EN010162/APP/6.4.12.2]. No

		significant effects during construction, operation or decommissioning have been identified. Mitigation measures will be secured as part of the DCO, via Requirements as demonstrated in the Draft DCO [EN010162/APP/3.1] and are also provided in the Commitments Register [EN010162/APP/7.1].
2.9.27	'Line noise is most commonly caused by corona noise when the conductor surface electric stress exceeds the inception level for corona discharge activity which is released as acoustic energy and radiates into the air as sound. Transmission line conductors are normally designed to operate below this threshold.'	Please see response to Paragraph 2.9.26 above.
2.9.28	'Surface contamination on a conductor or accidental damage during transport or installation can cause local enhancement of electric stress and initiate discharge activity leading to the generation of additional noise.'	Please see response to Paragraph 2.9.26 above.
2.9.34	'Transmission line audible noise is generally categorised as 'crackle' or 'hum', according to its tonal content.'	Please see response to Paragraph 2.9.26 above.
2.9.37	'Audible noise effects can also arise from substation equipment such as transformers, quadrature boosters and mechanically switched capacitors.'	Please see response to Paragraph 2.9.26 above.
2.9.38	'Transformers are installed at many substations, and generate low frequency hum. Whether the noise can be heard outside a substation depends on a number of factors, including transformer type and the level of noise attenuation present (either engineered intentionally or provided by other structures).'	Please see response to Paragraph 2.9.26 above.
2.9.39	'For the assessment of noise from substations, standard methods of	Please see response to Paragraph 2.9.26 above.

	assessment and interpretation using the principles of the relevant British Standards[25] are satisfactory.'	
2.9.40	"For the assessment of noise from overhead lines, the applicant must use an appropriate method to determine the sound level produced by the line in both dry and wet weather conditions, in addition to assessing the impact on noise-sensitive receptors.'	Please see response to Paragraph 2.9.26 above.
Electric and Magnetic Fields (EMFs)		
2.9.44 to 2.9.58	Health effects of EMFs	Chapter 16 – Miscellaneous Issues [EN010162/APP/6.2.16] and Technical Appendix 16.2, Health and Mental Wellbeing Impact Assessment Screening [EN010162/APP/6.4.16.2] provides an assessment of EMFs in relation to the cables which exceed 132kV. This concludes that no significant effects are anticipated and also considers the public's concern regarding the perception of EMF's.
Sulphur Hexafluoride		
2.9.59	'Sulphur Hexafluoride (SF6) is an insulating and arc-suppressant gas used in high-voltage switchgear for electricity networks.'	This is noted.
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.'	This is noted.
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.'	The Development seeks to avoid the use of SF6-reliant assets.

Secretary of State decision making		
Impacts Biodiversity and Geological conservation		
2.11.1	'Where biodiversity impacts are identified, including those associated with bird collision with overhead lines, the Secretary of State should be satisfied that all feasible options for mitigation have been considered and evaluated appropriately.'	Biodiversity impacts are assessed within Chapter 8 – Ecology and Biodiversity [EN010162/APP/6.2.8]. No significant adverse effects are predicted.
Landscape and Visual		
2.11.2	'The Secretary of State should be satisfied that the development, so far as is reasonably possible, complies with the Holford and Horlock Rules (please see paragraphs 2.9.16 - 2.9.19) or any updates to them.'	Chapter 7 – Landscape and Visual Impact Assessment [EN010162/APP/6.2.7] considers landscape and visual impacts of the Development and concludes that after decommissioning, no significant effects will remain.
2.11.3	'The Secretary of State should also be satisfied that all feasible options for mitigation – including the rationalisation, reconfiguration, or undergrounding of existing electricity networks infrastructure, have been considered and evaluated appropriately.'	Feasible mitigation options have been evaluated and applied where appropriate.
2.11.4	'In circumstances where it can be demonstrated that a mitigation measure and/ or technological approach is appropriate and/ or necessary for a project, including to limit landscape and visual impact as set out above, the Secretary of State should take this into account in decision making.'	Please see response to Paragraph 2.11.2 above.
2.11.5	'Nationally designated landscapes have specific statutory purposes which help ensure their continued protection. The Secretary of State should have special regard to nationally designated landscapes, where the general presumption in favour of overhead lines should be reversed to favour undergrounding.'	The Development does not fall within a nationally designated landscape, and nor will it have an effect on one.
Noise and vibration		

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 place, the residual noise impacts are unlikely to be significant.'	Where relevant, noise and vibration has been assessed in Chapter 12 – Noise and Vibration [EN010162/APP/6.2.12]. No significant effects during construction, operation or decommissioning have been identified. Mitigation measures will be secured through as part of the DCO, via Requirements as detailed in the Draft DCO [EN010162/APP/3.1]. See also the Commitments Register [EN010162/APP/7.1].
2.11.8	Consequently, noise from overhead lines is unlikely to lead to the Secretary of State refusing an application, but it may need to consider the use of appropriate requirements in the DCO to ensure noise is minimised as far as is practicable'.	Please see response to Paragraph 2.11.7 above.
Electric and Magnetic Fields (EMFs)		
2.11.9	'This NPS does not repeat the detail of the ICNIRP 1998 guidelines on restrictions or reference levels. The government has developed with the electricity industry a Code of Practice, 'Power Lines: Demonstrating compliance with EMF public exposure guidelines – a voluntary Code of Practice', published in February 2011 that specifies the evidence acceptable to show compliance with ICNIRP 1998 guidelines and is also in line with the terms of the 1999 EU Council Recommendation on EMF exposure.'	Chapter 16 – Miscellaneous Issues [EN010162/APP/6.2.16] and Technical Appendix 16.2, Health and Mental Wellbeing Impact Assessment Screening [EN010162/APP/6.4.16.2] provides an assessment of EMFs in relation to the cables which exceed 132kV. These demonstrate that no significant effects are anticipated.
Sulphur Hexafluoride		
2.11.17	'The Secretary of State should grant consent for an electricity networks development only if the applicant has demonstrated either:	The Development seeks to avoid the use of SF6-reliant assets.

	i. that the development will not use SF6; or ii. (a) that there is no proven commercially available alternative to the use of SF6; and (b) that a bespoke SF6-free alternative would be grossly disproportionate in terms of cost; and (c) that emissions monitoring and control measures compliant with the F-gas Regulation and/or its successors are in place.'	

5 NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

11 The purpose of the Policy Compliance Tables is to outline the main Policy considerations that are relevant to the Development, as described in the Application and to demonstrate compliance with Policy. Not all Sections of the National Planning Policy Framework are applicable to the Development of a Solar and Biodiversity Park and the tables outline those which are considered relevant in the preparation of the Application, noting that the Site is entirely onshore and a significant distance from the Coast. The Site is located entirely in the Countryside and outside of the Defined Green Belt. The Policy Compliance Tables cross reference to the relevant Documents/Reports.

Section/ Paragraph Number	Description	Comments
Section 2 – Achieving sustainable development		
Paragraph 2	Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the development plan and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.	This is noted. As detailed within Section 4 of the Planning Statement [EN010162/APP/5.4], the Development has been assessed against all relevant national and local policy alongside material considerations.
Paragraph 5	Highlights that the NPPF does not contain specific policies for NSIPs and that these are to be determined in accordance with the decision-making framework in the PA 2008 and relevant NPSs as well as any other matters that are considered relevant (which may include the NPPF).	As detailed in Section 2 of the Planning Statement [EN010162/APP/5.4], the PA 2008 makes it clear that the NPSs have primacy, and there are no exceptions under Section 104(3) which would merit an alternative approach taken. It is acknowledged however that the NPPF is a material consideration and has been considered throughout the application, including within this Policy Compliance Table.
Paragraph 10	Provides that for sustainable development to be pursued	Paragraph 7 confirms sustainable development should meet future

	positively, at the heart of the NPPF, is a presumption in favour of sustainable development.	needs without prejudicing matters such as climate change. Paragraph 8 also relates to social, economic and environmental objectives. The Development is temporary in nature and has been designed and laid out, and is subject to a number of mitigation measures, which together deliver sustainable development. A Commitments Register [EN010162/APP/7.1] has been submitted as part of the application which confirms the commitments which form part of the Development providing a number of mitigation measures. The Development successfully delivers a vital contribution to the Governments solar targets, as set out in the Clean Power 2030 Action Plan, Net Zero obligations and significant BNG.
Paragraph 11	Sets out the presumption in favour of sustainable development, which for decision-taking means: *"c) approving development proposals that accord with an up-to-date development plan without delay; or* *d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:* *i. the application of policies in this Framework that protects areas or assets of particular importance provides a clear reason for refusing the development proposed; or* *ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."*	Section 2 of the Planning Statement [EN010162/APP/5.4] sets out the decision-making process the Secretary of State will follow in respect of NSIP's. The NPPF and PPG for England, has been taken into account within the energy NPSs where appropriate (Paragraph 4.1.11), and will therefore be taken into account by the SoS. To the extent paragraph 11 is relevant, the Development accords with its provisions.

Section 6 – Building a strong, competitive economy		
Paragraph 85	Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, with wider opportunities to be considered. The approach taken should allow challenges of the future to be addressed. This is particularly important where Britain can be a global leader in driving innovation.	The principle of development is such that the Development will provide economic opportunity for the foreseeable future and be economically viable in line with future renewable energy targets. Chapter 13 – Socioeconomics and Tourism [EN010162/APP/6.2.13] provides further detail on the economic benefits of the Development, and concludes that there will be no significant adverse effects on socioeconomics and tourism during the construction, operation or decommissioning phases of the Developments and there will be significant beneficial effects upon economic output throughout all phases and employment during construction. Volume 4, Technical Appendix 13.2, Employment and Skills Plan [EN010162/APP/6.4.13.2] has been submitted with the application and outlines the employment and training opportunities the Application is seeking to provide to ensure local skills are enhanced. The Development will successfully deliver a vital contribution to the Governments solar targets, as set out in the Clean Power 2030 Action Plan, and Net Zero obligations in the region for the long term.
Section 8 – Promoting Healthy and Safe Communities		
Paragraph 96	Planning policies and decisions should aim to achieve healthy, inclusive and safe places which: a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street	Recreation is assessed and reported in Chapter 18 [EN010162/APP/6.2.18]. This chapter of the ES evaluates the likely significant effects of the Development as on publicly accessible recreation interests resources within and around the Order Limits. Beneficial effects have been identified during the operational

	layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages; b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and c) enable and support healthy 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.	phase of the Development on all new permissive routes. This is assessed as a major, and significant, beneficial effect. Further consideration has been given of the effect of the Development on Public Rights of Way within Chapter 14 – Traffic and Access [EN010162/APP/6.2.14] Chapter 16 – Miscellaneous Issues [EN010162/APP/6.2.16], also includes Human Health considerations, and draws together findings of other relevant assessments across the Environmental Statement.
Paragraph 98	To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should: a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments; b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all	This is noted. See response to paragraph 96.

	sections of the community; c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs; d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.	
Paragraph 99	Planning policies and decisions should consider the social, economic and environmental benefits of estate regeneration. Local planning authorities should use their planning powers to help deliver estate regeneration to a high standard.	This is noted. See response to paragraph 96.
Paragraph 103	Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.	This is noted. See response to paragraph 96.
Paragraph 104	Existing open space, sports and recreational buildings and land, including playing fields and	This is noted. See response to paragraph 96.

	formal play spaces, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.	
Paragraph 105	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.	This is noted. See response to paragraph 96.
Paragraph 106	The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.	This is noted. See response to paragraph 96.
Paragraph 107	The Local Green Space designation should only be used where the green space is:	This is noted. See response to paragraph 96.

	a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land.	
Section 9 – Promoting sustainable transport		
Paragraph 109	Transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This should involve: a) making transport considerations an important part of early engagement with local communities; b) ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places; c) understanding and addressing the potential impacts of development on transport networks; d) realising opportunities from existing or proposed transport infrastructure, and changing transport technology and usage – for example in relation to the scale, location or density of development that can be accommodated; e) identifying and pursuing opportunities to promote walking, cycling and public transport use; and	Transport issues have been considered from the start of the Project in terms of the need to deliver the infrastructure to the Site, whilst taking account of its rural location. Chapter 14 - Traffic and Access [EN010162/APP/6.2.14]. assesses the potential transport related environmental effects of the Development arising during the construction, operation and decommissioning phases. Technical Appendix 5.2 Outline Construction Traffic Management Plan (CTMP) [EN010162/APP/6.4.5.2] also forms part of the Submission, assessing potential vehicle movement impacts arising from the Development and how these will be managed. This assessment has demonstrated that none of the effects associated with traffic movements during the life of the Development are considered to lead to significant effects on environmental receptors. The main traffic effects are associated with the increase in vehicle movements along the local

	f) identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.	roads leading to the site during the construction phase. Whilst the percentage increases are likely to be high on the local roads, this is as a result of the low base traffic flow numbers along these roads. A final CTMP will be developed and agreed with the relevant stakeholders prior to construction, in order to control and mitigate effects associated with vehicle movements.
Paragraph 115	In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location; b) safe and suitable access to the site can be achieved for all users; c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code48; and d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.	This is noted. The Site is not allocated, when identifying it as the right place for the Development, the factors within this paragraph were considered. See response to paragraph 109.
Paragraph 116	*"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual*	The main traffic effects are associated with the increase in vehicle movements along local roads during the construction phase. Consideration has been

	cumulative impacts on the road network would be severe."	given in Chapter 14 – Traffic and Access [EN010162/APP/6.2.14] to, inter alia, highway safety and the cumulative impact on the road network and no significant effects are predicted. Technical Appendix 5.2, Outline Construction Traffic Management Plan [EN010162/APP/6.4.5.2] has been submitted with the application, with a final version to be developed and agreed with the relevant stakeholders prior to construction, which will control and mitigate effects associated with vehicle movements. Consequently, there are no unacceptable impacts as per the policy requirements. At the end of the 40 year operation period, Technical Appendix 5.6, Outline Decommissioning and Restoration Plan [EN010162/APP/6.4.5.6] confirms what infrastructure will remain in situ, which will be subject to final confirmation with the Local Planning Authority. Cables located beneath the public highway are not proposed to be removed following the end of the period of consent. The Development poses minimal impact to highway safety and associated cumulative impact to the wider network.
Paragraph 117	Within this context, applications for development should: a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and	This is noted. See response to paragraph 109.

	appropriate facilities that encourage public transport use; b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport; c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards; d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.	
Paragraph 118	All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored.	This is noted. See response to paragraph 109.
Section 11 – Making effective use of land		
Paragraph 125	Identifies how planning policies and decisions should encourage multiple benefits from both urban and rural land and take opportunities to achieve net environmental gains such as developments that, amongst other things, would enable new habitat creation.	The Development has evolved in a way that positively balances the impacts associated with development at scale in countryside locations, with the very significant benefits the Development will bring. The Development provides for colocation of solar and BESS which delivers effective use of land (as per NPS), plus allows continuation of an agricultural use.

		Importantly, the Development is regarded by Government as being a CNP, providing as it does a vital contribution to the delivery of the Governments solar targets, as set out in the Clean Power 2030 Action Plan; making a positive contribution to its Net Zero obligations and its BNG goals, and by helping to positively address the Climate Change Emergency that NSDC has declared.
Section 12 – Achieving well-designed places		
Paragraph 131	Confirms good design is a key aspect of sustainable development.	Whilst the Applicant has limited influence over the design, especially regarding the electrical infrastructure associated with the Development, the design approach has been considered throughout the Development. Chapter 4 – Alternatives [EN010162/APP/6.2.4] provides detail on the Development's design. Design has been iterative and responded to consultation responses. In addition, the application has been submitted with a Concept Design Parameters and Principles Document [EN010162/APP/3.4] alongside a Technical Appendix 4.1 Design Approach Document [EN010162/APP/5.8], which provide further detail regarding the design approach taken and how this complies with policy objectives in the NPSs and the NPPF.
Paragraph 135	Requires developments to be designed in a manner which is sympathetic to existing conditions, whilst optimising the potential of the site.	Please see response to Paragraph 131 above.
Section 14 – Meeting the challenge of climate change, flooding and coastal change		
Paragraph 161	States *"The planning system should support the transition to net zero by 2050 and take full account of all climate impacts …*	The Planning Statement [EN010162/APP/5.4] sets out how the Development will contribute to delivering net zero targets.

	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."	Climate Change effects are set out within Chapter 15 – Climate Change [EN010162/APP/6.2.15]. Significant beneficial effects in relation to carbon emissions savings from the Great North Road Solar and Biodiversity Park are predicted. When considered cumulatively with UK-wide renewable energy development, a major and significant positive effect is predicted, by actively reversing the risk of severe climate change, relative to the baseline. The Applicant considers the Development complies with the NPPF and represents a unique opportunity to contribute at scale to the resolution of the Climate Change Emergency declared by NSDC.
Paragraph 162	Seeks for plans to pro-actively mitigate and adapt to climate change whilst taking into account long-term implications and for policies to support appropriate measures, ensuring the future health and resilience of communities and infrastructure to climate change impacts.	Whilst the host authorities have not expressly allocated land for renewable energy development, the host Local Planning Authority, NSDC has planning policies which support, in principle, renewable energy development. These are: Spatial Policy 6 – Infrastructure for Growth, of the Newark and Sherwood Amended Core Strategy (2019) and Policy DM4 – Renewable and Low Carbon Energy Generation of the Newark and Sherwood Allocations and Development Management DPD (2013). These are addressed within this Policy Compliance Document [EN010162/APP/5.5]. Whilst Nottinghamshire County Council do not have a specific policy in regard to renewable energy development, of those policies which have been identified as relevant, no conflicts have been identified. The Applicant considers the Development complies with the NPPF and represents a unique

		opportunity to contribute at scale to the resolution of the Climate Change Emergency declared by NSDC.
Paragraph 163	Requires for the need to mitigate and adapt to climate change to also be considered in preparing and assessing planning applications, with the full range of potential climate change impacts taken into account.	Please see the response to Paragraph 161 above.
Paragraph 164	New development should be planned for in ways that avoids increased vulnerability to the range of impacts arising from climate change, in addition to reducing greenhouse gas emissions.	Please see the response to Paragraph 161 above.
Paragraph 165	Seeks for plans to increase the use and supply of renewable and low carbon energy and heat via positive strategies which maximise the potential for suitable development, future re-powering and life extension, whilst ensuring adverse impacts are addressed, including cumulative landscape and visual impacts.	Please see response to Paragraph 162 above. Each ES chapter has assessed the impacts of the Development throughout construction, operation and decommissioning with mitigation proposed and secured where there maybe impacts. Regarding Landscape and Visual Impact, these are addressed at Chapter 7 – Landscape and Visual Impact Assessment [EN010162/APP/6.2.7] which includes a Cumulative Effects Assessment. This concludes that if Kelham Solar Farm were present (south of the Order Limits), the effects of the Development would be slightly reduced in the area immediately northeast and east and in views from Micklebarrow Hill where the Development would be seen in front of open views of Kelham Solar Farm; these reductions in effects would be limited in extent and degree and would not be sufficient to alter the magnitude of impact or level of effects previously summarised in Chapter 7.

Paragraph 168	Confirms that when determining applications for all forms of renewable and low carbon energy developments and their associated infrastructure, applications should not be required to demonstrate the overall need for renewable or low carbon energy, whilst significant weight should be given to their contribution to a net-zero future.	The Applicant notes and welcomes the position on need. Despite there being no requirement to demonstrate the overall need for the Development, a Statement of Need has been submitted with the Application [EN010162/APP/7.2] which outlines the planning need.
Paragraph 170	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.	Climate issues are assessed and reported in ES Chapter 9: Water Resources [EN010162/APP/6.2.9] and Technical Appendix 9.1: Flood Risk Assessment (FRA) [EN010162/APP/6.4.9.1] The FRA has been conducted in line with the relevant criteria, confirming the Development can be made safe from flood risk, without increasing flood risk elsewhere.
Paragraph 171	Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards.	This is noted. See response to paragraph 170. Notwithstanding this, a Flood Risk Assessment [EN010162/APP/6.4.9.1] has been submitted with the Application.
Paragraph 172	All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this,	This is noted. See response to paragraph 170.Also see comments within the Site Selection and Design Chapter [EN010162/APP/6.2.4].

	and manage any residual risk, by: a) applying the sequential test and then, if necessary, the exception test as set out below; b) safeguarding land from development that is required, or likely to be required, for current or future flood management; c) using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management); and d) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.	
Paragraph 173	A sequential risk-based approach should also be taken to individual applications in areas known to be at risk now or in future from any form of flooding, by following the steps set out below.	This is noted. See response to paragraph 170.
Paragraph 174	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.	This is noted. See response to paragraph 170.
Paragraph 175	The sequential test should be used in areas known to be at	This is noted. See response to paragraph 170.

	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 176	Applications for some minor development and changes of use should also not be subject to the sequential test, nor the exception test set out below, but should still meet the requirements for site-specific flood risk assessments set out in footnote.	This is noted. See response to paragraph 170. This is also not minor development.
Paragraph 177	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 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.	This is noted. See response to paragraph 170.
Paragraph 178	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:	This is noted. See response to paragraph 170.

	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	Both elements of the exception test should be satisfied for development to be allocated or permitted	This is noted. See response to paragraph 170.For confirmation, all tests are satisfied.
Paragraph 181	When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that: a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location; b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment; c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate; d) any residual risk can be safely managed; and e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.	This is noted. See response to paragraph 170.

Paragraph 182	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; c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development.	This is noted. See response to paragraph 170.
Paragraph 187	Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.	The Landscape and Visual Impact Assessment Chapter [EN010162/APP/6.2.7] and Ecology and Biodiversity Chapter [EN010162/APP/6.2.7] outlines how the Development enhances ecology and biodiversity in the area, whilst taking steps to reduce visual impacts arising from the Development.

	… 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	
Section 15 – Conserving and enhancing the natural environment		
Paragraph 192	To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.	Geology issues are assessed and reported in Chapter 10: Ground Conditions and Land Contamination [EN010162/APP/6.2.10], with ecology issues addressed in Chapter 8 Ecology and Biodiversity [EN010162/APP/6.2.8]. These chapters of the ES evaluate the possible impacts of the Development on the climate and ecology throughout its construction, operation, and decommissioning phases.
Paragraph 193	When determining planning applications, local planning authorities should consider impacts to biodiversity, SSSIs, ancient woodlands and biodiversity.	The Development does not cause significant harm to biodiversity, SSSIs, avoids irreplaceable habitats and ancient woodlands. To confirm, improvements to biodiversity are integrated in to the

		Development as part of the design.
Paragraph 196	Planning policies and decisions should ensure that: a) a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation); b) after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and c) adequate site investigation information, prepared by a competent person, is available to inform these assessments.	This is noted. See response to paragraph 192.
Paragraph 198	Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should: a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life; b) identify and protect tranquil areas which have remained	Chapter 16 – Miscellaneous Issues [EN010162/APP/6.2.16], which includes a section on Human Health, and draws together findings of other relevant assessments across the Environmental Statement. The conclusion of the assessment confirms compliance. Noise and Vibration are assessed in Chapter 12 – Noise and Vibration [EN010162/APP/6.2.12]. This chapter has assessed the significance of potential noise and vibration effects during the construction, operational and decommissioning phases, and concludes that noise or vibration effects are not significant in terms of the EIA Regulations.

	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.	Furthermore, the Development complies with the policy.
Paragraph 199	Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.	The Air Quality Assessment confirms compliance with the relevant limits.
Paragraph 200	Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a	Socio-economic impacts are assessed in Chapter 13 – Socio-Economics and Tourism [EN010162/APP/6.2.13]. The Assessment accounts for socio-economic impact across all levels. The Development will not unreasonably restrict existing buildings and facilities.

	result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.	Taking into account the mitigation measures described within the chapter, significant effects with respect to Socio-Economics and tourism are only likely to occur in relation to construction phase employment, economic output, during all phases and skills and training during construction and operational phase. No significant cumulative effects are likely to occur with respect to Socio-Economics and recreation. With respect to Socio-Economic and recreation, no transboundary effects are likely to occur during construction, operation and maintenance and decommissioning of the Proposed Development on the interests of European Economic Area states.
Paragraph 201	The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities.	Where other permissions are required, they will be applied for as noted in the Consents and Licenses Required Under Other Legislation report [EN010162/APP/7.3].
Section 17 – Facilitating the sustainable use of minerals		
Paragraph 222	It is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. Since minerals are a finite natural resource, and can only be	As confirmed in the Mineral Resource Assessment [EN010162/APP/6.4.10.9], the Development is seeking consent for 40 years so although the Order Limits includes part of a Mineral

	worked where they are found, best use needs to be made of them to secure their long-term conservation.	Safeguarding Area, it will not be sterilised permanently.
Paragraph 223	Planning policies should: a) provide for the extraction of mineral resources of local and national importance, but not identify new sites or extensions to existing sites for peat extraction; b) so far as practicable, take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials, whilst aiming to source minerals supplies indigenously; c) safeguard mineral resources by defining Mineral Safeguarding Areas and Mineral Consultation Areas7; and adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development where this should be avoided (whilst not creating a presumption that the resources defined will be worked); d) set out policies to encourage the prior extraction of minerals, where practical and environmentally feasible, if it is necessary for non-mineral development to take place; e) safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals; the manufacture of concrete and concrete products; and the handling, processing and distribution of substitute, recycled and secondary aggregate material;	Land contamination issues are assessed and reported in Chapter 10: Ground Conditions and Land Contamination [EN010162/APP/6.2.10]. This chapter of the ES evaluates the possible impacts of the Development on the climate throughout its construction, operation, and decommissioning phases. Potential impacts of ground contamination of groundwater, surface water, future site users and off-site users, associated with the construction, operational and maintenance, and decommissioning phases of the Development, were identified. These impacts result in effects of either negligible or minor adverse significance. Possible impacts on sterilisation of mineral reserves have been subject to review and a Minerals Resource Assessment prepared for the Development and is presented in Minerals Resource Assessment – [EN010162/APP/6.4.10.9].

	f) set out criteria or requirements to ensure that permitted and proposed operations do not have unacceptable adverse impacts on the natural and historic environment or human health, taking into account the cumulative effects of multiple impacts from individual sites and/or a number of sites in a locality; g) when developing noise limits, recognise that some noisy short-term activities, which may otherwise be regarded as unacceptable, are unavoidable to facilitate minerals extraction; and h) ensure that worked land is reclaimed at the earliest opportunity, taking account of aviation safety, and that high quality restoration and aftercare of mineral sites takes place.	
Paragraph 224	When determining planning applications, great weight should be given to the benefits of mineral extraction, including to the economy. In considering proposals for mineral extraction, minerals planning authorities should: a) as far as is practical, provide for the maintenance of landbanks of non-energy minerals from outside National Parks, the Broads, National Landscapes and World Heritage Sites, scheduled monuments and conservation areas; b) ensure that there are no unacceptable adverse impacts on the natural and historic environment, human health or aviation safety, and take into account the cumulative effect of multiple impacts from individual sites and/or from a number of sites in a locality;	This is noted. See response to paragraph 223.

	c) ensure that any unavoidable noise, dust and particle emissions and any blasting vibrations are controlled, mitigated or removed at source, and establish appropriate noise limits for extraction in proximity to noise sensitive properties; d) not grant planning permission for peat extraction from new or extended sites; e) provide for restoration and aftercare at the earliest opportunity, to be carried out to high environmental standards, through the application of appropriate conditions. Bonds or other financial guarantees to underpin planning conditions should only be sought in exceptional circumstances; f) consider how to meet any demand for the extraction of building stone needed for the repair of heritage assets, taking account of the need to protect designated sites; and g) recognise the small-scale nature and impact of building and roofing stone quarries, and the need for a flexible approach to the duration of planning permissions reflecting the intermittent or low rate of working at many sites.	
Paragraph 225	Local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working.	This is noted. See response to paragraph 223. It is worth highlighting the temporary nature of the consent.

6 NEWARK AND SHERWOOD DISTRICT COUNCIL ALLOCATIONS AND DEVELOPMENT MANAGEMENT DPD

12 The purpose of the Policy Compliance Tables is to outline the main Policy considerations that are relevant to the Development, as described in the Application and to demonstrate compliance with Policy. Not all Sections of the Newark and Sherwood Allocations and Development Management DPD are applicable to the Development of a Solar and Biodiversity Park and the tables outline those which are considered relevant in the preparation of the Application, noting that the Site is entirely onshore and a significant distance from the Coast. The Site is located entirely in the Countryside and outside of the Defined Green Belt. The Policy Compliance Tables cross reference to the relevant Documents/Reports.

Policy	Brief Description	Comments
Policy DM3 – Developer Contributions and Planning Obligations	Planning applications will be expected to include appropriate infrastructure provision through Community Infrastructure Levy (CIL), planning obligations and developer contributions.	The Applicants are significantly investing in the Development, which will provide a vital contribution to Critical National Priority infrastructure. The weight attributed to CNP infrastructure in the planning balance is noted and discussed in Section 4 of the Planning Statement [EN010162/APP/5.4].
Policy DM4 – Renewable and Low Carbon Energy Generation	States that permission shall be granted for renewable energy generation schemes unless there are adverse impacts that outweigh the benefits.	Climate Change effects are set out within Chapter 15 [EN010162/APP/6.2.15]. Significant beneficial effects from the Development are predicted. The Applicant considers the Development complies with the Plan and represents a unique opportunity to contribute at scale to the resolution of the Climate Change Emergency declared by the host authorities.
Policy DM5 – Design	All proposals will be assessed against a set of criteria comprising general material planning considerations (in accordance with Core Policy 9 (Sustainable Design)) to ensure it would not result in any unacceptable impacts.	Whilst the Applicant has limited influence over the design of electrical infrastructure associated with the Development, the DCO has been submitted with a Concept Design Parameters and Principles Document [EN010162/APP/7.14], alongside a Design Approach Document

		[EN010162/APP/5.6] which detail the design approach taken and how this complies with policy objectives. The design parameters, from which assessments have taken place, have been established as detailed in Chapter 5 – Development Description [EN010162/APP/6.2.5]. Final design approval of the relevant elements will be agreed with the relevant planning authority, secured via a Requirement in the DCO.
Policy DM7 – Biodiversity and Green Infrastructure	New development, in line with the requirements of Core Policy 12 (Biodiversity and Green Infrastructure), should protect, promote and enhance green infrastructure to deliver multi-functional benefits and contribute to the ecological network both as part of on-site development proposals and through off site provision.	Decommissioning proposals are set out in Chapter 5 – Development Description [EN010162/APP/6.2.5] In addition, an outline Decommissioning and Restoration Plan [TA A5.6 EN010162/APP/6.4.5.6] also details the decommissioning proposals. Any landscape structural planting will be left in situ, including that which is created to deliver biodiversity enhancement. As a result, the Development complies with Policy DM7.
Policy DM8 – Development in the Open Countryside	Silent on the appropriateness of renewable energy in the open countryside. However, the District Council's commitment to tackling climate change is set out in Core Policy 10 (Climate Change). Also states: "proposals resulting in the loss of the most versatile areas of agricultural land, will be required to demonstrate a sequential approach to site selection and demonstrate environmental or	Chapter 7 – Landscape and Visual Impact [EN010162/APP/6.2.7] considers effects upon the landscape. Limited adverse effects cannot be avoided, but these effects have been minimised by following key layout and design principles. The Concept Design Parameters and Principles Document [EN010162/APP/7.14] provides for buffers between existing settlements and the solar arrays, buffers to protect trees hedgerows and woodland. These measures, together with the significant new landscaping

	community benefits that outweigh the land loss.”	proposed, assist is reducing adverse visual effects and effect upon landscape character. Once decommissioned, the Development will leave an important and significant landscape legacy, resulting in a significant enhancement of the area. On balance the Development is considered to comply with Policy DM8.
Policy DM9 – Protecting and Enhancing the Historic Environment	In accordance with the requirements of Core Policy 14 (Historic Environment), all development proposals concerning heritage assets are expected to secure their continued protection or enhancement, contribute to the wider vitality, viability and regeneration of the areas in which they are located and reinforce a strong sense of place.	The assessment of the likely impacts and effects on heritage assets is set out in Chapter 11 – Cultural Heritage and Archaeology [EN010162/APP/6.2.11]. The assessment has not reported any significant effects to heritage assets following the implementation of appropriate mitigation measures. No significant effects to heritage assets arising from change within their setting leading to a reduction in significance have been identified
Policy DM10 – Pollution and Hazardous Materials	Development proposals involving hazardous materials or the potential for pollution should take account of and address their potential impacts in terms of health, the natural environment and general amenity. Any impact should be balanced against the economic and wider social need for the development. Proposals should include necessary mitigation as part of the development or through off site measures where necessary.	Where relevant these matters are addressed in Chapter 16 - Miscellaneous Issues [EN010162/APP/6.2.16].
Policy DM12 – Presumption in Favour of	Confirms a positive approach will be taken where proposals reflect the NPPF presumption in favour of sustainable development and	Chapter 8 – Ecology and Biodiversity EN010162/APP/6.2.8]

Sustainable Development	that the Council will work pro-actively to ensure proposals can be approved wherever possible, whilst improving the economic, social and environmental conditions within the district.	addresses biodiversity net gain requirements across the site. The Development has been designed and laid out, and is subject to a number of mitigation measures, which together deliver sustainable development. The Development successfully delivers a vital contribution to the Governments solar targets and Net Zero obligations, significant BNG, and will leave a significant and positive landscape and biodiversity legacy in the region for the long term.

7 NEWARK AND SHERWOOD DISTRICT COUNCIL AMENDED CORE STRATEGY DPD

1 The purpose of the Policy Compliance Tables is to outline the main Policy considerations that are relevant to the Development, as described in the Application and to demonstrate compliance with Policy. Not all Sections of the Newark and Sherwood Amended Core Strategy DPD are applicable to the Development of a Solar and Biodiversity Park and the tables outline those which are considered relevant in the preparation of the Application, noting that the Site is entirely onshore and a significant distance from the Coast. The Site is located entirely in the Countryside and outside of the Defined Green Belt. The Policy Compliance Tables cross reference to the relevant Documents/Reports.

Policy	Brief Description	Comments
Spatial Policy 1 – Settlement Hierarchy	Identifies which settlements are central to the delivery of Newark and Sherwood's Spatial Strategy and identifies the role of these settlements in delivering that Strategy.	The Development lies within the "Other Villages in Newark & Sherwood" designation in accordance with the Settlement Hierarchy. This is further addressed against Spatial Policy 3.
Spatial Policy 2 – Spatial Distribution of Growth	Outlines what the spatial distribution of growth in Newark and Sherwood District will focus on.	The policy supports renewable energy development in sustainable locations, which is demonstrated through accordance with the relevant policies within the Core Strategy.
Spatial Policy 3 – Rural Areas	Beyond Principal Villages, proposals for new development will be considered against a number of criteria. Development not in villages or settlements, in the open countryside, will be strictly controlled and restricted to uses which require a rural setting.	The Development has evolved in a way that positively balances the impacts associated with development at scale in countryside locations, with the very significant benefits the Development will bring. Importantly, the Development is regarded by Government as being a CNP, providing as it does a vital contribution to the delivery of the Governments solar targets; making a positive contribution to its Net Zero obligations and its BNG goals, and also by helping to positively address the Climate Change Emergencies that the host authorities have declared.
Spatial Policy 6 – Infrastructure for Growth	Ensures the delivery of infrastructure to support growth in the District.	The Development falls within one of the Council's 'priority business sectors', where policy states

		development within said sectors will be encouraged. The Development represents a unique opportunity to secure critical national infrastructure in the form of renewable solar energy. It is also able to contribute at scale to the resolution of the Climate Change Emergency declared by the authority.
Spatial Policy 7 – Sustainable Transport	Development proposals should contribute to the implementation of the Nottinghamshire Local Transport Plan through reducing the need for travel, safe access, be appropriate for the highway network, avoid highway improvements which harm the character of the area, provides appropriate parking and avoids an increase in traffic problems.	Chapter 14 – Traffic and Access [EN010162/APP/6.2.14] assesses the effect of the Development on the highway network. This assessment has demonstrated that none of the effects associated with traffic movements during the life of the Development are considered to lead to significant effects on environmental receptors. The Development with Spatial Policy 7.
Core Policy 6 – Shaping our Employment Profile	The economy of Newark and Sherwood District will be strengthened and broadened to provide a diverse range of employment opportunities. Development of priority business sectors will also be encouraged, which includes sustainable energy and environmental technologies.	The Development falls within one of the Council's 'priority business sectors', where policy states development within said sectors will be encouraged. The Development will provide short term jobs during the construction period, but also longer term opportunities through continued growth of the renewable energy sector. The Development complies with Core Policy 6.
Core Policy 7 – Tourism Development	The Council recognises the economic benefits of sustainable tourism and visitor based development, stating they will view proposals positively which help to realise the tourism potential of the District, support	As confirmed in Chapter 13 – Socio-Economics and Tourism [EN010162/APP/6.2.13], as part of the Development, the Applicant is planning to enhance landscaping areas within the Order Limits, as well as providing

	the meeting of identified tourism needs, complement and enhance existing attractions or that address shortfalls in existing provision, subject to certain considerations being met.	23 permissive footpaths and 6 permissive bridleways, improving access into green / open spaces. Impacts on tourism receptors, and cumulative impacts were all deemed acceptable.
Core Policy 9 – Sustainable Design	States that new development should achieve a high standard of sustainable design and layout that is of an appropriate form and scale to its context complementing the existing built and landscape environments.	Chapter 4 - Alternatives [EN010162/APP/6.2.4] describes the design evolution of the Development and how from the outset, measures were introduced to avoid or minimise potential for significant adverse effects upon amenity and character of the area as shown within the Concept Design Parameters and Principles Document [EN010162/APP/7.14]. The Development complies with Core Policy 9.
Core Policy 10 – Climate Change	Confirms the commitment to tackling the causes and impacts of climate change and to delivering a reduction in the District's carbon footprint through: • Promoting energy generation from renewable and low-carbon sources; • Ensure that development proposals maximise where appropriate use of available local opportunities for district heating and decentralised energy; • Ensuring that new development proposals minimise their potential adverse environmental impacts during the construction and operation phase; • Steer new development away from those areas at highest risk of flooding; • Where appropriate applying the Sequential Test and the	Whilst some limited adverse effects will arise, the benefits of the Development are considered to clearly outweigh these and thus it complies with Core Policy 10. The Development represents a unique opportunity to secure critical national infrastructure in the form of renewable solar energy. It is also able to contribute at scale to the resolution of the Climate Change Emergency declared by the authority. Flood risk is addressed within Chapter 9 – Water Resources [EN010162/APP/6.2.9] A Flood Risk assessment has been undertaken amongst other assessments. No adverse effects are predicted during construction, operation or the decommissioning phases of the Development.

	Exceptions Test, in line with national guidance; and • Ensure that new development positively manages its surface water run-off.	
Core Policy 12 – Biodiversity and Green Infrastructure	Seeks to secure development that maximises the opportunities to conserve, enhance and restore biodiversity through implementing the aims and proposals of the Nottinghamshire Local Biodiversity Action Plan, the Green Infrastructure Strategy and the Nature Conservation Strategy.	The Development presents a unique opportunity for the planning authority to secure significant BNG and landscape enhancements. This will be achieved by retaining an agricultural use beneath the solar arrays and on other undeveloped land, and by managing it in a way to deliver significant BNG. Significant new landscaping proposals also form part of the Development, including the Biodiversity Park. The Development will not only provide overall protection to the existing landscape features but also a substantial enhancement to green infrastructure in the area, supported by long term management Details are set out within the Concept Design Parameters and Principles Document [EN010162/APP/7.14], The Development complies with Core Policy 12.
Core Policy 13 – Landscape Character	New development must positively address the implications of relevant landscape Policy Zone(s) that is consistent with the landscape conservation and enhancement aims for the area(s) ensuring that landscapes, including valued landscapes, have been protected and enhanced.	Chapter 7 – Landscape and Visual Impact Assessment [EN010162/APP/6.2.7] considers effects upon the landscape. The Development will affect landscape character as it introduces a form of development that is not currently common in the landscape. Limited adverse effects cannot be avoided, but these effects have been

		minimised by following key layout and design principles. The Concept Design Parameters and Principles Document [EN010162/APP/7.14] provides for buffers to protect trees hedgerows and woodland. These measures together with the significant new landscaping proposed, assist is reducing adverse visual effects and effect upon landscape character. Once decommissioned, the Development will leave an important and significant landscape legacy, resulting in a significant enhancement of the area. On balance the Development is considered to comply with Core Policy 13.
Core Policy 14 – Historic Environment	Seek to protect the historic environment and ensure that heritage assets are managed in a way that best sustains their significance. The importance of considering the setting of designated heritage assets is expressed in Section 16 of the NPPF and the accompanying PPG.	The assessment of the likely impacts and effects on heritage assets is set out in Chapter 11 – Cultural Heritage and Archaeology [EN010162/APP/6.2.11]. The assessment has not reported any significant effects to heritage assets following the implementation of appropriate mitigation measures. No significant effects to heritage assets arising from change within their setting leading to a reduction in significance have been identified. In Planning terms, there is no substantial harm arising and therefore the Development is substantially in accordance with Core Policy 14.
ShAP 1 – Sherwood Area	Proposals must maintain and enhance the ecological, heritage	The intention of the policy is to promote development that would

and Sherwood Forest Regional Park	and landscape value of the Sherwood Area whilst promoting sustainable and appropriate leisure, tourism and economic regeneration. Development must not have a detrimental impact on national, regional, county and locally designated sites.	provide sustainable leisure, tourism, and economic regeneration. The vision for a Sherwood Forest Regional Park includes objectives like recognising the landscape as a positive asset, generating a sense of place, and promoting the health and well-being of the local population. The policy is broad and all encompassing, and whilst still pertinent to the proposal should be addressed appropriately in line with the location, scale and nature of development. Chapter 7 – Landscape and Visual Impact [EN010162/APP/6.2.7] considers effects upon the landscape. The Development will affect landscape character as it introduces a form of development that is not currently common in the landscape. Limited adverse effects cannot be avoided, but these effects have been minimised by following key layout and design principles. The Concept Design Parameters and Principles Document [EN010162/APP/7.14] provides for buffers to protect trees hedgerows and woodland. These measures together with the significant new landscaping proposed, assist is reducing adverse visual effects and effect upon landscape character. Once decommissioned, the Development will leave an important and significant landscape legacy, resulting in a

		significant enhancement of the area. On balance the Development is considered to comply with Core Policy 13.

8 NEWARK AND SHERWOOD DISTRICT COUNCIL EMERGING AMENDED ALLOCATIONS AND DEVELOPMENT MANAGEMENT DPD

13 The purpose of the Policy Compliance Tables is to outline the main Policy considerations that are relevant to the Development, as described in the Application and to demonstrate compliance with Policy. Not all Sections of the Newark and Sherwood Emerging Amended Allocations and Development Management DPD are applicable to the Development of a Solar and Biodiversity Park and the tables outline those which are considered relevant in the preparation of the Application, noting that the Site is entirely onshore and a significant distance from the Coast. The Site is located entirely in the Countryside and outside of the Defined Green Belt. The Policy Compliance Tables cross reference to the relevant Documents/Reports.

Policy	Brief Description	Comments
DM3 – Developer Contributions and Planning Obligations	Planning applications will be expected to include appropriate infrastructure provision through Community Infrastructure Levy (CIL), planning obligations and developer contributions.	The Applicants are significantly investing in the Development, which will provide a vital contribution to Critical National Priority infrastructure. The weight attributed to CNP infrastructure in the planning balance is noted and discussed in Section 4 of the Planning Statement [EN010162/APP/5.4]. CIL is not applicable in this instance as the Application is an NSIP, whilst it is expected the Development will enter in a Development Consent Obligation.
Policy DM4 – Renewable and Low Carbon Energy Generation	In order to achieve the commitment to carbon reduction set out in Core Policy 10, planning permission will be granted for renewable and low carbon energy generation development, as both standalone projects and part of other development, its associated infrastructure (including battery storage) and the retro-fitting of existing	Climate Change effects are set out within Chapter 15 [EN010162/APP/6.2.15]. Significant beneficial effects from the Development are predicted. There is support for renewable energy schemes, in addition to co-located storage as associated development.

	development, where its benefits are not outweighed by detrimental impact from the operation and maintenance of the development.	The ES and Planning Statement [EN010162/APP/5.4] both demonstrate that the benefits of the Development outweigh any impacts arising from operation and maintenance. The Applicant considers the Development complies with the Plan and represents a unique opportunity to contribute at scale to the resolution of the Climate Change Emergency declared by the host authorities.
Policy DM5(a) – The Design Process	Proposals shall be informed by, and respond to, a robust site and contextual appraisal that will identify constraints and opportunities and satisfy the requirements of the National Design Guide and any locally adopted Design Codes where relevant to the proposal.	Whilst the Applicant has limited influence over the design of electrical infrastructure associated with the Development, the design process has been iterative having regard to identified constraints and the outcome of consultation. Further, the Application has been submitted with a Concept Design Parameters and Principles Document [EN010162/APP/7.14], alongside a Design Approach Document [EN010162/APP/5.6]. These detail the four stages to the design process, where compliance with each is required and engagement is encouraged. The documents detail the design approach taken and how this complies with policy objectives. The design parameters, from which assessments have taken place, have been established as detailed in Chapter 5 – Development Description

		[EN010162/APP/6.2.5] of the Environmental Statement. Final design approval of the relevant elements will be agreed with the relevant planning authority, secured via a Requirement in the DCO.
Policy DM5(b) – Design	All proposals will be assessed against a set of criteria comprising general material planning considerations (in accordance with Core Policy 9 (Sustainable Design) and design principles in the National Design Guide and any Local Design Codes) to ensure it would not result in any unacceptable impacts.	Whilst the Applicant has limited influence over the design of electrical infrastructure associated with the Development, the Application has been submitted with a Concept Design Parameters and Principles Document [EN010162/APP/3.4], alongside a Design Approach Document [EN010162/APP/5.8] which detail the design approach taken and how this complies with policy objectives. The design parameters, from which assessments have taken place, have been established as detailed in Chapter 5 – Development Description [EN010162/APP/6.2.5]. Final design approval of the relevant elements will be agreed with the relevant planning authority, secured via a Requirement in the DCO.
Policy DM5(c) – Sequential Test	In line with Core Policy 10 of the Amended Core Strategy, a sequential approach to development and flood risk will be following, steering new development away from those areas at highest risk. Development will not be permitted if there are reasonably available sites appropriate for	Chapter 9 – Water Resources [EN010162/APP/6.2.9] considers that there is an anticipated negligible significant effect on water resources. This is supplemented by the accompanying Flood Risk Assessment and Outline

	the proposed development in areas at lower risk of flooding.	Drainage Strategy document [[EN010162/APP/6.4.9.1]. It is considered that the Development complies with Policy DM5(c).
Policy DM7 – Biodiversity and Green Infrastructure	New development, in line with the requirements of Core Policy 12 (Biodiversity and Green Infrastructure), should protect, promote and enhance green infrastructure to deliver multi-functional benefits and contribute to the ecological network both as part of on-site development proposals and through off site provision. The enhancement should be a net gain of at least 10% as measured by the applicable DEFRA metric or any successor document. These gains must be guaranteed for a period of at least 30 years.	Substantial Biodiversity Net Gain (BNG) is incorporated into the Development design. The prevailing DEFRA metric has been used to calculate the BNG of the Development, which is proposed to deliver 60% for habitats, 26% for hedgerows and 11% for watercourses. Further details can be found in Biodiversity Net Gain [BNG] Assessment Technical Appendix A8.13 [EN010162/APP/6.4.8.13]. An outline Landscape and Ecological Management Plan (oLEMP) will act as a mechanism to record and monitor ecological data on created, or evolving habitats, during the operation of the Development [TA A5.1 EN010162/APP/6.4.5.1]. Decommissioning proposals are set out in Chapter 5 – Development Description [EN010162/APP/6.2.5] In addition, an Outline Decommissioning and Restoration Plan [EN010162/APP/6.4.5.6] also details the decommissioning proposals. Any landscape structural planting will be left in situ, including that which is created to deliver biodiversity enhancement. As a result, the Development complies with Policy DM7.
Policy DM8 – Development in	Silent on the appropriateness of renewable energy in the open countryside. However, the	Chapter 7 – Landscape and Visual Impact [EN010162/APP/6.2.7]

the Open Countryside	District Council seeks to ensure development away from villages or settlements, in the open countryside, will be strictly controlled and limited.	considers effects upon the landscape. Limited adverse effects cannot be avoided, but these effects have been minimised by following key layout and design principles. The Concept Design Parameters and Principles Document [EN010162/APP/7.14] provides for buffers between existing settlements and the solar arrays, buffers to protect trees hedgerows and woodland. These measures, together with the significant new landscaping proposed, assist is reducing adverse visual effects and effect upon landscape character. Once decommissioned, the Development will leave an important and significant landscape legacy, resulting in a significant enhancement of the area. On balance the Development is considered to comply with Policy DM8.
Policy DM9 – Protecting and Enhancing the Historic Environment	In accordance with the requirements of Core Policy 14 (Historic Environment), all development proposals concerning heritage assets are expected to secure their continued protection or enhancement, contribute to the wider vitality, viability and regeneration of the areas in which they are located and reinforce a strong sense of place.	Chapter 11 – Cultural Heritage and Archaeology [EN010162/APP/6.2.11] details that with mitigation, minor adverse or negligible effects are anticipated, which are not significant in EIA terms. No significant effects to heritage assets arising from change within their setting leading to a reduction in significance has been identified.
Policy DM10 – Pollution and Hazardous Materials	Development proposals involving hazardous materials or the potential for pollution should take account of and address their potential impacts in terms of health, the natural	Where relevant these matters are addressed in Chapter 16 - Miscellaneous Issues [EN010162/APP/6.2.16].

	environment and general amenity. Any impact should be balanced against the economic and wider social need for the development. Proposals should include necessary mitigation as part of the development or through off site measures where necessary.	
Policy DM12 – Presumption in Favour of Sustainable Development	Confirms a positive approach will be taken where proposals reflect the NPPF presumption in favour of sustainable development and that the Council will work pro-actively to ensure proposals can be approved wherever possible, whilst improving the economic, social and environmental conditions within the district.	Chapter 8 - Ecology and Biodiversity [EN010162/APP/6.2.8] addresses biodiversity net gain requirements across the Site. There is substantial support in the NPPF for renewable energy development. The benefits from the Development clearly outweigh potential impacts in terms of supporting renewable energy development and effects on climate change. The Development has been designed and laid out, and is subject to several mitigation measures, such as additional planting, recreational routes and more, which together deliver sustainable development. The Development successfully delivers a vital contribution to the Governments solar targets and Net Zero obligations, significant BNG, and will leave a significant and positive landscape and biodiversity legacy in the region for the long term.

9 NOTTINGHAMSHIRE AND NOTTINGHAM WASTE CORE STRATEGY

14 The purpose of the Policy Compliance Tables is to outline the main Policy considerations that are relevant to the Development, as described in the Application and to demonstrate compliance with Policy. Not all Sections of the Nottinghamshire and Nottingham Waste Core Strategy are applicable to the Development of a Solar and Biodiversity Park and the tables outline those which are considered relevant in the preparation of the Application, noting that the Site is entirely onshore and a significant distance from the Coast. The Site is located entirely in the Countryside and outside of the Defined Green Belt. The Policy Compliance Tables cross reference to the relevant Documents/Reports.

Policy	Brief Description	Comments
Policy WCS2: Waste Awareness, prevention and re-use	Requires all new development to be designed, constructed and implemented to minimise the creation of waste, maximise the use of recycled materials and assist the collection, separation, sorting, recycling and recovery of waste arising from the development.	Chapter 10 – Ground Conditions [EN010162/APP/6.2.10] assesses waste and natural resources. Waste minimisation measures will be adopted as part of the Technical Appendix 5.6 Outline Decommissioning and Restoration Plan EN010162/APP/6.4.5.6]. It is concluded that there will be no likely significant effects arising from the Development during the construction, operation and maintenance or decommissioning phases.
Policy WCS10: Safeguarding Waste Management Sites	Outlines where sites will be safeguarded for waste management facilities. The policy goes on to confirm safeguarding will only apply to the above identified sites and any land immediately adjacent to the site where a need to safeguard has been clearly demonstrated.	Nottinghamshire County Council confirmed there are no waste management facilities within the Draft Order Limits, with the closest being Dean Hall Anaerobic Digestion Plant over 700m away. As such, they stated there would be no safeguarding issues arising from the Development.

10 NOTTINGHAMSHIRE MINERALS LOCAL PLAN

15 The purpose of the Policy Compliance Tables is to outline the main Policy considerations that are relevant to the Development, as described in the Application and to demonstrate compliance with Policy. Not all Sections of the Nottinghamshire Minerals Local Plan are applicable to the Development of a Solar and Biodiversity Park and the tables outline those which are considered relevant in the preparation of the Application, noting that the Site is entirely onshore and a significant distance from the Coast. The Site is located entirely in the Countryside and outside of the Defined Green Belt. The Policy Compliance Tables cross reference to the relevant Documents/Reports.

Policy	Brief Description	Comments
Policy SP7: Minerals Safeguarding, Consultation Areas and Associated Minerals Infrastructure	Non-minerals development within minerals safeguarding areas will have to demonstrate that mineral resources will not be needlessly sterilised as a result of the development and that the development would not pose a serious hindrance to future extraction in the vicinity. Where this cannot be demonstrated, and where there is a clear and demonstrable need for the non-minerals development, prior extraction will be sought where practicable.	Mineral Safeguarding Areas for brick clay, sand and gravel has been identified within the Development area. In accordance with local planning policy, a Mineral Resource Assessment (MRA) has been undertaken that demonstrates that although there are deposits of potential commercial interest, the Development will not result in the permanent sterilisation of these resources. The MRA is presented as technical appendices to the Environmental Assessment, [EN010162/APP/6.4.10.9] Notwithstanding, the Applicant considers the Development to be substantially in accordance with Policy SP7.
Policy DM6: Historic Environment	Confirms it is important to protect, conserve and enhance the historic environment of the County, the enjoyment of which contributes to the quality of life of present and future generations. Point 6 of this policy states: "*No development shall take place within the archaeological*	An Archaeological Resource Area (ARA) is identified across the east and south-east of Study Area 4. There is a presumption against mineral extraction within such areas for the Plan period. Compliance is shown in Section A10.9.4.6 of the MRA

	resource area at South Muskham."	[EN010162/APP/6.4.10.9]. The extent of South Muskham Archaeological Resource Area is presented within Figure A10.9.34: Extracts of NMLP Inset 9 extent of South Muskham ARA and its location with respects to the Study Areas. The policy, therefore, places greater importance on such archaeological features and is considered to outweigh the importance of mineral extraction in such areas. As such, the Development does not conflict with this policy, as it provides a more appropriate use which would better preserve the Resource Area, compared to if it were used for mineral extraction.
Policy MP2: Sand and Gravel Provision	An adequate supply of sand and gravel (7 years of reserves) will be identified to meet expected demand over the plan period from continued extraction of quarries and extensions of existing quarries.	Compliance is demonstrated in Section A10.9.6.4 of the MRA [EN010162/APP/6.4.10.9]. The demand for sand and gravel extraction sites should primarily be met within the established Newark and Idle Valley quarries. These quarries are expected to continue serving as the main sources for meeting regional aggregate needs, thereby minimising the need to open new extraction sites. Specifically, active sites Besthorpe Quarry and Langford Lowfield's, located in Newark-on-Trent (NG23 7HQ and NG23 7QL respectively), and approximately 1.9 and 1.1

		km east of the easternmost border of Study Area 6. Nottinghamshire's current landbank for sand and gravel reserves, bolstered by existing quarries in Newark and Idle Valley, is well-positioned to meet regional demands until 2036. The geographical and logistical challenges presented by the River Trent further emphasise the focus on utilising existing permitted sites rather than extending extraction operations into new areas. Given the temporary nature of the Development, it is unlikely that the available sand and gravel reserves will be considered sterilised. This means that the underlying sand and gravel reserves remain accessible and can be extracted in the future if there is a need to meet demand. The installation of solar parks does not permanently alter the land, meaning the valuable sand and gravel resources beneath will remain available for future use, only temporarily unavailable.

11 NOTTINGHAMSHIRE AND NOTTINGHAM DRAFT WASTE LOCAL PLAN

16 The purpose of the Policy Compliance Tables is to outline the main Policy considerations that are relevant to the Development, as described in the Application and to demonstrate compliance with Policy. Not all Sections of the Nottinghamshire and Nottingham Draft Waste Local Plan are applicable to the Development of a Solar and Biodiversity Park and the tables outline those which are considered relevant in the preparation of the Application, noting that the Site is entirely onshore and a significant distance from the Coast. The Site is located entirely in the Countryside and outside of the Defined Green Belt. The Policy Compliance Tables cross reference to the relevant Documents/Reports.

Policy	Brief Description	Comments
Policy SP1: Waste prevention and re-use	All new development should be designed, constructed, and operated to minimise the creation of waste, maximise the use of recycled materials, and assist with the collection, separation, sorting, recycling and recovery of waste arising from the development during its use.	Chapter 10 – Ground Conditions [EN010162/APP/6.2.10] assesses waste and natural resources. Waste minimisation measures will be adopted as part of the Technical Appendix 5.6 Outline Decommissioning and Restoration Plan [EN010162/APP/6.4.5.6]. It is concluded that there will be no likely significant effects arising from the Development during the construction, operation and maintenance or decommissioning phases.
Policy SP8: Safeguarding Waste Management Sites	Confirms the County Council will seek to avoid the loss of existing authorised waste management facilities, including potential extensions; sites which have an unimplemented planning permission; and facilities to transport waste, such as rail or water. Proposals for non-waste uses near existing or permitted waste management facilities will need to provide suitable mitigation before the	Nottinghamshire County Council confirmed there are no waste management facilities within the Draft Order Limits, with the closest being Dean Hall Anaerobic Digestion Plant over 700m away. As such, they stated there would be no safeguarding issues arising from the Development.

	development is completed, to address significant adverse impacts and demonstrate that the waste management uses can operate without unreasonable restrictions being placed upon them.	