

Environmental Statement

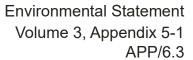
Volume 3, Appendix 5-1: National Policy Statement Requirements

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Appendix 5-1: National Policy Statement Requirements

1.1 Introduction

- 1.1.1 This Environmental Statement (ES) appendix supports and should be read alongside ES Volume 1, Chapter 5: Energy Need, Legislative Context and Energy Policy [EN010168/APP/6.1] of the ES which sets out the legislative and policy framework relevant to the Scheme.
- 1.1.2 This appendix identifies the relevant policy set out within the National Policy Statements (NPSs) which are considered to 'have effect' in respect of the Scheme, under s104(2) of the Planning Act 2008.
- 1.1.3 The relevant NPSs are:
 - Overarching National Policy Statement for Energy (EN-1) (Ref 1);
 - National Policy Statement for Renewable Energy (EN-3) (Ref 2); and
 - National Policy Statement for Electricity Networks (EN-5) (Ref 3).
- 1.1.4 This appendix specifies the policies within the above NPSs that relate to the assessment undertaken to identify the likely significant effects in relation to the environmental topics set out in **ES Volume 1, Chapters 7 to 20** [EN010168/APP/6.1].
- 1.1.5 This appendix does not assess the Scheme against the policy and guidance set out within the NPSs, instead, this assessment is presented in the Planning Statement [EN010168/APP/7.2].



Table 1: Relevant NPS Policy for ES Volume 1 Chapter 7: Climate Change

Key NPS Policy and Guidance Location of information provided to address

NPS EN-1

Section 4.10 Climate Change Adaptation and Resilience

The Applicant's assessment should:

- Consider the direct and indirect impacts of climate change when planning the location, design, build, operation and, where appropriate, decommissioning of new energy infrastructure (para 4.10.8)
- Take account of the projected impacts of climate change using government guidance and industry standard benchmark, in accordance with the EIA Regulations (para 4.10.9)
- Assess the impacts on and from their proposed energy project across a range of climate scenarios, in line with appropriate expert advice and guidance available at the time (para 4.10.10)
- Demonstrate that proposals have a high level of climate resilience built-in from the outset and demonstrate how proposals can be adapted over their predicted lifetimes to remain resilient to a credible maximum climate change scenario (para 4.10.11)
- Where energy infrastructure has safety critical elements, the applicant should apply a credible maximum climate change scenario (para 4.10.12)

ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1] considers the direct and indirect impacts of climate change. Table 7-32 sets out the potential impacts and embedded mitigation measures during construction and decommissioning. Table 7-33 sets out the potential impacts and embedded mitigation measures during operation and maintenance.

key provision of the NPS

Paragraph 7.6.2 of **ES Volume 1**, **Chapter 7**: **Climate Change [EN010168/APP/6.1]** sets out the sources of information used to prepare the assessment of projects impacts of climate change. This includes government guidance and industry standard benchmark in accordance with the EIA Regulations.

Section 7.10 of **ES Volume 1**, **Chapter 7**: **Climate Change [EN010168/APP/6.1]** assesses the impacts on and from the Scheme across a range of climate scenarios.

Section 7.9 of **ES Volume 1**, **Chapter 7**: **Climate Change [EN010168/APP/6.1]** sets out the mitigation measures embedded into the Scheme design to build-in climate resilience from the outset and ensure the Scheme remains resilient to the credible maximum climate change scenario throughout its lifetime.

The assessment in Section 7.10 of **ES Volume** 1, Chapter 7: Climate Change [EN010168/APP/6.1] has considered a 'worst-case' scenario.

Section 5.3 Greenhouse Gas Emissions

Para 5.3.4: Proposals for energy infrastructure should include a Greenhouse Gas assessment as part of the ES. This should include:

- A whole life GHG assessment showing construction, operational and decommissioning GHG impacts, including impacts from change of land use.
- An explanation of the steps that have been taken to drive down the climate change impacts at each of those stages.

Section 7.10 of **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** presents a whole life GHG assessment showing construction, operational and decommissioning GHG impacts.

Section 7.9 of ES Volume 1, Chapter 7: Climate Change [EN010168/APP/7.1] sets out the measures embedded into the Scheme design to drive down climate change impacts at each stage of the Scheme.



- Measurement of embodied GHG impact from the construction stage.
- How reduction in energy demand and consumption during operation has been prioritised in comparison with other measures.
- How operational emissions have been reduced as much as possible through the application of best available techniques for that type of technology.
- Calculation of operational energy consumption and associated carbon emissions.
- Whether and how any residual GHG emissions will be (voluntarily) offset or removed using a recognised framework.
- Where there are residual emissions, the level of emissions and the impact of those on national and international efforts to limit climate change, both alone and where relevant in combination with other developments at a regional or national level, or sector level, if sectoral targets are developed

Location of information provided to address key provision of the NPS

Table 7-22 of **ES Chapter 7: Climate Change [EN010168/APP/6.1]** provides a measurement of the embodied GHG impact from the construction stage of the Scheme.

The measures to reduce energy demand and consumption are set out in Table 1 of the Outline Operational Environmental Management Plan (Outline OEMP) [EN010168/APP/7.13].

Section 7.9 of **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** sets out measures embedded into the design to reduce emissions during the operation of the Scheme.

Table 7-26 of **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** sets out the operational GHG emissions.

Section 7.12, Table 7-36 and Table 7-37 of **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** sets out a summary of the significant residual effects during the construction and decommissioning, and operation of the Scheme.

NPS EN-3

Section 2.4 Climate change adaptation and resilience

Para 2.4.11: Solar photovoltaic sites may be proposed in low lying exposed sites. For these proposals, applicants should consider, in particular, how plant will be resilient to:

- Increased risk of flooding; and
- Impact of higher temperatures

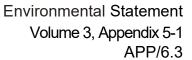
The likely significant effects of flooding have been considered in Section 11.10 of ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]. Measures setting out how the Scheme will be resilient to flood are described in Section 11.9 of ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1].

ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1] has considered the direct and indirect impacts of climate change in terms of higher temperatures including heatwaves and wildfires. Table 7-34 and Table 7-35 of ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1] set out the measures embedded into Scheme design to ensure resilience to higher temperatures.

NPS EN-5

Section 2.3 Climate change adaptation and resilience

ES Volume 1, Chapter 7: Climate Change of the ES [EN010168/APP/6.1] sets out how the effects of climate change have been considered





Key NPS Policy and Guidance	Location of information provided to address key provision of the NPS
Para 2.3.2: 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:	in the design of the Scheme and during the construction, operation and decommissioning of the Scheme.
 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; 	Section 7.9 of ES Volume 1, Chapter 7: Climate Change of the ES [EN010168/APP/6.1] sets out the measures embedded into the Scheme design to ensure resilience to flooding.
 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. 	Table 7-32 and Table 7-33 of ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1] set out how the Scheme design has considered the impact of increased temperatures during construction and decommissioning, and operation and maintenance.



Table 2: Relevant NPS Policy for ES Volume 1 Chapter 8: Landscape and Visual

Key NPS Policy and Guidance	Location of information provided to address key provision of the NPS
NPS EN-1	
Section 5.10 Landscape and Visual The LVIA should: Include reference to any landscape character assessment and associated studies, and take account of any relevant policies based on these assessments in local development documents (para 5.10.17) Consider landscape and visual matters in the early stages of siting and design, where site choices and design principles are being established (para 5.10.19) include the effects on landscape components and character during construction and operation. For projects which may affect a National Park, The Broads or an AONBs the assessment should include effects on the natural beauty and special qualities of these areas' (para 5.10.20) include the visibility and conspicuousness of the project during construction and of the presence and operation of the project and potential impacts on views and visual amenity (para 5.10.21) address the landscape and visual effects of noise and light pollution, and other emissions from construction and operational activities on residential amenity and on sensitive locations, receptors and views, how these will be minimised (para 5.10.22) consider how landscapes can be enhanced using landscape management plans, as this will help to enhance environmental assets where they contribute to landscape and townscape quality (para 5.10.24) draw attention, in the supporting evidence to their applications, to any examples of existing permitted infrastructure they are aware of with a similar magnitude of impact on equally sensitive receptors (para 5.10.25)	Section 8.3 of ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] considers the relevant studies and local development documents. ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] describes the consideration of alternatives carried out by the Applicant in relation to the Site for the Scheme, layouts and choice of technology. The Site Selection Methodology is discussed in Section 4.3 of ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]. ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] includes an assessment of effects in 8.10, including the Cotswolds National Landscape assessment, the visibility and conspicuousness of the project during construction and of the presence and operation of the project, and noise and light pollution. ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] outlines enhancement measures in Section 8.9. ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] provides a cumulative effects assessment in Section 8.13.

NPS EN-3



- Applicants should aim to reduce visual impacts on public rights of way, while also considering the effect on surrounding landscape views (para 2.10.43)
- Applicants should assess the visual impact of these security measures, as well as the impacts on local residents, including for example issues relating to intrusion from CCTV and light pollution in the vicinity of the site (para 2.10.47)
- Applicants should refer to the general guidance on landscape and visual impacts in Section 5.10 of NPS EN-1, which applies across all types of energy infrastructure and sets out principles for landscape protection. (para 2.10.93)
- The cumulative landscape and visual impact of large-scale solar farms should be assessed in the same way as other onshore energy developments. However, because solar farms are often located in open, low-lying areas, they may have a broader visual impact than other infrastructure types. (para 2.10. 94)
- Although ground-mounted solar farms may cover a large area, their visual impact can be effectively reduced through good screening and careful use of the site's topography. (para 2.10. 95)
- Landscape and visual impacts must be carefully considered before applying, especially in relation to the purposes of nationally designated landscapes. (para 2.10. 96)
- Applicants must include a Landscape and Visual Impact Assessment in the Environmental Statement, with visualisations where needed to show effects on heritage settings, nearby homes, or key viewpoints. (para 2.10. 97).
- Applicants should follow EN-1's good design principles and make strong efforts to minimise the landscape and visual impact of solar PV developments, particularly in nationally designated landscapes. (para 2.10. 98)
- 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 (see paragraphs 2.10.46 – 2.10.48 above). (para 2.10. 99)

An assessment of PRoW is included in ES Volume 1, Chapter 8: Landscape and Visual, [EN010168/APP/6.1] and supported by the Outline Public Rights of Way and Permissive Paths Management Plan [EN010168/APP/7.17].

ES Volume 1, Chapter 8: Landscape and Visual, [EN010168/APP/6.1] includes an assessment of effects including CCTV, light pollution and fencing.

ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] considers the relevant policies in Section 8.3, including Section 5.10 of NPS EN-1.

Cumulative effects are included in Section 8.13 of ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1].

Section 8.9 of ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] includes embedded mitigation including screening.

ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] provides a landscape and visual impact assessment with visualisations.

ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] considers the relevant policies are outlined in Section 8.3.

ES Volume 3, Appendix 8-6 Assessment of Effects on the Special Qualities of the Cotswold National Landscape provides an assessment of the effects of the Lime Down Solar Park on the Cotswolds National Landscape (CNL) and its Special Qualities.

ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] includes an assessment of effects including CCTV, light pollution and fencing.

A tree survey and arboricultural/hedge assessment is included in ES Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1] and ES Volume 1, Appendix 10-1: Arboricultural Impact



Environmental Statement Volume 3, Appendix 5-1 APP/6.3

•	Applicants should plan the design,
	construction, and maintenance to protect
	and preserve boundary vegetation,
	hedges, and mature trees, allowing them
	to grow to maturity where possible. (para
	2.10. 100)

The impact of the proposed development on established trees and hedges should be informed by a tree survey and arboricultural/hedge assessment as appropriate. (para 2.10.101)

Assessment and Outline Method Statement [EN010168/APP/6.3].

NPS EN-5

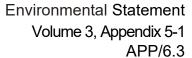
 While the government does not believe that the development of overhead lines is incompatible in principle with applicants' statutory duty under Schedule 9 to the Electricity Act 1989, to have regard to visual and landscape amenity and to reasonably mitigate possible impacts thereon, in practice new overhead lines can give rise to adverse landscape and visual impacts. (para 2.9.7) No new overhead lines are proposed.



Table 3: Relevant NPS Policy for Volume 1 Chapter 9: Ecology and Biodiversity

Key NPS Policy and Guidance	Location of information provided to address key provision of the NPS
NPS EN-1	
Section 5.4: Biodiversity and Geological Conservation The applicant's assessment should: • show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests (para 5.4.19) • consider wider ecosystem services and benefits of natural capital when designing enhancement measures (para 5.4.20) • 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 (para 5.4.32) • 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 (para 5.4.33)	ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] provides information on how the Scheme has taken opportunities to conserve and enhance biodiversity conservation interests. ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] provides information on how the Scheme has considered wider ecosystem services when designing enhancement measures, with proposed ecological enhancement measures shown in ES Volume 2, Figure 3-4 Landscape and Ecology Mitigation Plan [EN010168/APP/6.2]. ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] sets out the likely effects on habitats including ancient woodland, and concludes that with careful design and embedded mitigation, there will be no adverse effects on ancient woodland. Embedded mitigation measures include the provision of suitably protective buffer zones as set out in Section 9.9 of ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. For further details of impacts on ancient woodland and veteran trees, see ES Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1]. ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]. ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1].
NPS EN-3	
Section 2.10 Solar Photovoltaic Generation The applicant's assessment:	Sections 9.8 and 9.10 of ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] identify potential risks to ecological features arising from the Scheme.

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- should identify any ecological risk from developing on the proposed site (para 2.10.76)
- 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 (para 2.10.79)
- When designing solar PV sites, applicants must assess how security measures, particularly CCTV and lighting, might affect local ecosystems. CCTV cameras should be sited thoughtfully to reduce ecological disturbance, and any necessary lighting should be kept to a minimum and directed away from sensitive habitats to mitigate environmental impact. (para 2.10.82)
- Applicants must carefully manage site boundaries, especially when hedges or scrub are involved. If vegetation is removed, additional surveys may be required to assess ecological impacts. Designs should include buffer zones between fencing and existing vegetation, and fencing should be structured to allow safe passage for animals like mammals and reptiles, as guided by ecological assessments. (para 2.10.83).

The assessment contained within ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] evaluates how the Scheme may impact ecological features and identifies appropriate mitigation measures to avoid or minimise identified impacts. Desk study information has been used to inform the assessment, as described in Section 9.6 of the chapter. Further details of the desk study findings are provided in ES Volume 3, Appendix 9-1: Ecological Baseline Report [EN010168/APP/6.3].

Section 9.9 and 9.10 of ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] consider security measures.

Section 9.9 of ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1] provides a description of buffer zones.



Table 4: Relevant NPS Policy for ES Volume 1, Chapter 10: Arboriculture

Key NPS Policy and Guidance	Location of information provided to address key provision of the NPS
NPS EN-1	
Section 5.4: Biodiversity and Geological Conservation The applicant's assessment 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	Section 10.8 and Section 10.10 of ES Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1] and ES Volume 3, Appendix 10-1: Arboricultural Impact Assessment and Outline Method Statement [EN010168/APP/6.3] include the applicant's assessment of effects on ancient woodland, ancient and veteran trees or other irreplaceable habitats.
construction and operational phases (para 5.4.32) Section 5.11: Land Use, Including Open	
Space, Green Infrastructure, and Green Belt The applicant's assessment should:	
assess 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 (para 5.11.27)	
NPS EN-3	
Section 2.10 Solar Photovoltaic Generation The impact of the proposed development on established trees and hedges should be informed by a tree survey and arboricultural/hedge assessment as appropriate (para 2.10.101)	Section 10.6 of ES Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1] and ES Volume 3, Appendix 10-1: Arboricultural Impact Assessment and Outline Method Statement [EN010168/APP/6.3] sets out the assessment of effects on trees and hedges informed by a tree survey and arboricultural

assessment.



Table 5: Relevant NPS Policy for ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage

and Drainage

NPS EN-1

Section 5.8: Flood Risk

Key NPS Policy and Guidance

The applicant should:

- A site-specific flood risk assessment (FRA) for all energy projects located in Flood Zones 2 or 3 in England and Zones B or C in Wales is required. Even in lower-risk areas (Flood Zone 1 in England or Zone A in Wales) an FRA is still needed if the site is 1 hectare or more, has been identified as having critical drainage issues, is at increased future flood risk, is vulnerable to other forms of flooding such as surface water, or where relevant authorities (e.g. the Environment Agency, Lead Local Flood Authority, or Internal Drainage Board) have flagged potential drainage concerns (para 5.8.13).
- ensure the development (including construction works) accounts 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 (para 5.8.17)
- applicants should arrange preapplication discussions before the official pre-application stage of the NSIP process with the EA or NRW, and, where relevant, other bodies such as Lead Local Flood Authorities, Internal Drainage Boards, sewerage undertakers, navigation authorities, highways authorities and reservoir owners and operators (para 5.8.18). Such discussions should identify the likelihood and possible extent and nature of the flood risk, help scope the FRA, and identify the information that will be required by the Secretary of State to reach a decision on the application when it is submitted (para 5.8.19)
- discuss any reasonable concerns about the proposal on flood risk grounds raised by the EA or another flood risk management authority with the EA and

The Flood Risk Assessment is provided in the following documents:

Location of information provided to address

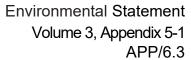
key provision of the NPS

- ES Volume 3, Appendix 11-1 Flood Risk Assessment and Drainage Strategy Covering Report
- ES Volume 3, Appendix 11-2 Flood Risk Assessment and Drainage Strategy - Lime Down A
- ES Volume 3, Appendix 11-3 Flood Risk Assessment and Drainage Strategy - Lime Down B
- ES Volume 3, Appendix 11-4 Flood Risk Assessment and Drainage Strategy - Lime Down C1
- ES Volume 3, Appendix 11-5 Flood Risk Assessment and Drainage Strategy - Lime Down C2
- ES Volume 3, Appendix 11-6 Flood Risk Assessment and Drainage Strategy - Lime Down D / BESS
- ES Volume 3, Appendix 11-7 Flood Risk Assessment and Drainage Strategy - Lime Down E1
- ES Volume 3, Appendix 11-8 Flood Risk Assessment and Drainage Strategy - Lime Down E2
- ES Volume 3, Appendix 11-9 Flood Risk Assessment and Drainage Strategy -Cable Route Corridor

ES Volume 3, Appendix 11-1: Flood Risk Assessment (FRA) and Drainage Strategy [EN010168/APP.6.3] takes account of existing watercourses and flood risk management structures or features, or land likely to be needed for future structures or features.

Section 11.2 of ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] sets out where preapplication discussions have been undertaken.

Section 11.2 of ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage





Key NPS Policy and Guidance	Location of information provided to address key provision of the NPS
take all reasonable steps to agree ways in which the proposal might be amended, or additional information provided, which would satisfy the authority's concerns (para 5.8.20) • ensure that where it is not possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites with medium risk areas and then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas (para 5.8.21) • when seeking development consent on a site allocated in a development plan through the application of the Sequential Test, informed by a strategic flood risk assessment, not apply the Sequential Test, provided the proposed development is consistent with the use for which the site was allocated and there is no new flood risk information that would have affected the outcome of the test (para 5.8.22) • take account of the policy on alternatives set out in Section 4.3 of EN1 when considering alternative sites. All projects should apply the Sequential Test to locating development within the site (para 5.8.23)	[EN010168/APP/6.1] sets out the matters discussed with the Environment Agency. ES Volume 3, Appendix 11-1: Flood Risk Assessment (FRA) and Drainage Strategy [EN010168/APP.6.3] explains how the Sequential Test has been applied in accordance with policy.
NPS EN-3	
Applicants must include any FRA with their Environmental Statement. The assessment should evaluate drainage impacts, though typically, solar PV installations are unlikely to cause significant drainage issues because the panels drain directly onto the underlying ground (para.2.10.84)	ES Volume 3, Appendix 11-1: Flood Risk Assessment (FRA) and Drainage Strategy [EN010168/APP.6.3] takes account of drainage impacts.



Table 6: Relevant NPS Policy for ES Volume 1, Chapter 12: Cultural Heritage

Key NPS Policy and Guidance

Location of information provided to address key provision of the NPS

NPS EN-1

Section 5.9: Historic Environment

The applicant's assessment should:

- assess 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 (para 5.9.9)
- include reference to any historic landscape or seascape character assessment and associated studies as a means of assessing impacts relevant to the proposed project (para 5.9.9)
- provide a description of the significance of the heritage assets affected by the proposed development, including any contribution made by their setting. The detail should be proportionate to the importance of the heritage asset (para 5.9.10)
- consult the relevant Historic Environment Record (para 5.9.10)
- carry out an appropriate desk-based assessment where a site on which development is proposed includes, or potentially includes heritage assets with an archaeological interest, and, where such desk-based research is insufficient to properly assess the interest, a field evaluation (para 5.9.11)
- ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents (para 5.9.12).

The Heritage Statement in ES Volume 3, Appendix 12-1 Heritage Statement [EN010168/APP/6.3] and Desk-Based Assessments in ES Volume 3, Appendix 12-2a Archaeological Desk Based Assessment Solar PV Sites [EN010168/APP/6.3] and ES Volume 3, Appendix 12-2b Archaeological Desk Based **Assessment Cable Route Corridor IEN010168/APP/6.31**, supported by the results of Air Photo and LiDAR Mapping and interpretation (ES Volume 3, Appendix 12-3 Air Photo and **LiDAR Mapping and Interpretation** [EN010168/APP/6.3]), geophysical survey (ES Volume 3, Appendix 12.4 Archaeological **Geophysical Survey Report** [EN010168/APP/6.3]) and evaluation trial trenching (ES Volume 3, Appendix 12-5 Interim **Evaluation Trial Trenching Reports** [EN010168/APP/6.3]) consider significant heritage impacts, where potential impact has been identified the mitigation hierarchy has been applied to identify appropriate mitigation to reduce harm. Section 12.9 and Section 12.11 of ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1] set out embedded and additional mitigation. Archaeological mitigation is set out in ES Volume 3 Appendix 12-6 Outline Archaeological Mitigation Strategy [EN010168/APP/6.3].

ES Volume 3, Appendix 12-7 Historic Landscape Character Assessment [EN010168/APP/6.3] provides an assessment to the historic landscape character. Potential impacts as a result of the Scheme to the historic landscape are discussed in Section 12.8 of ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1].

The Heritage Statement in **ES Volume 3 Appendix 12-1 Heritage Statement [EN010168/APP/6.3]** provides a description of the significance of the heritage assets, including any contribution made by their setting.

The Heritage Statement in ES Volume 3
Appendix 12-1 Heritage Statement
[EN010168/APP/6.3], Desk-Based Assessments
in ES Volume 3, Appendix 12-2a



Key NPS Policy and Guidance	Location of information provided to address key provision of the NPS
	Archaeological Desk Based Assessment Solar PV Sites [EN010168/APP/6.3] and ES Volume 3, Appendix 12-2b Archaeological Desk Based Assessment Cable Route Corridor [EN010168/APP/6.3] and Historic Landscape Character Assessment in ES Volume 3, Appendix 12-7 Historic Landscape Character Assessment [EN010168/APP/6.3] which inform the assessment provided in ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1], are informed by information provided by the Historic Environment Record. The Desk-Based Assessments in ES Volume 3, Appendix 12-2a Archaeological Desk Based Assessment Solar PV Sites [EN010168/APP/6.3] and ES Volume 3, Appendix 12-2b Archaeological Desk Based Assessment Cable Route Corridor [EN010168/APP/6.3] considers heritage assets with an archaeological interest and is supported by an appropriate field evaluation including an Air Photo and LiDAR Mapping and interpretation (ES Volume 3, Appendix 12-3 Air Photo and LiDAR Mapping and Interpretation [EN010168/APP/6.3]), geophysical survey (ES Volume 3, Appendix 12-4 Archaeological Geophysical Survey Report [EN010168/APP/6.3]) and evaluation trial trenching (ES Volume 3, Appendix 12-5 Interim Evaluation Trial Trenching Reports [EN010168/APP/6.3]).
NPS EN-3	
Section 2.10: Solar Photovoltaic Generation The applicant's assessments should: • be informed by information from Historic Environment Records (HERs) or the local authority (para 2.10.112)	The Heritage Statement in Appendix 12.1, Desk-Based Assessments in Appendix 12.2 and Historic Landscape Character Assessment in Appendix 12.7, which inform the assessment provided in ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1] , are informed by information provided by the Historic Environment Record.



Table 7: Relevant NPS Policy for ES Volume 1, Chapter 13: Transport and Access

Key NPS Policy and Guidance Location of information provided to address key provision of the NPS

NPS EN-1

Section 5.14: Traffic and Transport

The applicant's assessment should:

- include a transport appraisal if a project is likely to have significant transport implications (para 5.14.5)
- consult with National Highways and Highways Authorities as appropriate on the assessment and mitigation to inform the application to be submitted (para 5.14.6)
- prepare a travel plan and provide details of proposed measures to improve access by active, public and shared transport (para 5.14.7)

•

 consider any possible disruption to services and infrastructure in the assessment (para 5.14.8) Significance of transport implications is assessed in Section 13.10 of ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1].

The consultation undertaken with National Highways, Wiltshire Council and South Gloucestershire Council is summarised in Table 13-2 in ES Volume 1, Chapter 13: Transport and Access [EN010168/APP6.1].

A Construction Worker Travel Plan is provided in Annex C of the **Outline Construction Traffic Management Plan (Outline CTMP)** [EN010168/APP/7.22].

Proposed measures to improve access by active, public and shared transport is set out in **Outline CTMP [EN010168/APP/7.22]** and the Construction Worker Travel Plan in Annex C of the **Outline CTMP [EN010168/APP/7.22]**.

Further assessment of the impact on transport infrastructure is provided at ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3].

NPS EN-3

Section 2.10: Solar Photovoltaic Generation

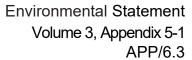
The applicant's assessment should:

- consider the suitability of the access routes to the proposed site for both the construction and operation of the solar farm (para 2.10.35)
- include the full extent of the access routes necessary for operation and maintenance and an assessment of their effects. (para 2.10.39).
- assess the various potential routes to the site for delivery of materials and components where the source of the materials is known at the time of the application, and select the route that is the most appropriate (para 2.10.123)
- assess the worst-case impact of additional vehicles on the likely potential routes, where the exact

Suitability of the access routes site is assessed in ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3] and also presented in the Outline CTMP [EN010168/APP/7.22].

Site access for operation and maintenance is set out in ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]. Appropriate routes are identified in ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3] and also presented in the Outline CTMP [EN010168/APP/7.22].

A cumulative assessment is included in Section 13.13 of ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1] and in Section 1.10 of ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3].





Key NPS Policy and Guidance	Location of information provided to address key provision of the NPS
location of the source of construction materials, such as crushed stone or concrete is not known at the time of the application (para 2.10.124) • 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 (para 2.10.125)	Section 13.9 of ES Volume 1, Chapter 13: Transport and Access confirms all sections of roads and bridges on the proposed delivery route can accommodate the weight and volume of the loads and width of vehicles, with Highway Improvement Areas in place.
include a cumulative transport assessment as part of the ES, 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 (para 2.10.126)	



Table 8: Relevant NPS Policy for ES Volume 1, Chapter 14: Noise and Vibration

Key NPS Policy and Guidance Location of information provided to address key provision of the NPS

NPS EN-1

Section 5.12: Noise and Vibration

Para 5.12.6: The applicant's assessment should include:

- a description of the noise generating aspects of the development proposal leading to noise impacts
- 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
- an assessment of the effect of predicted changes in the noise environment on any noise-sensitive receptors
- all reasonable steps taken to mitigate and minimise potential adverse effects on health and quality of life

The applicant's assessment should:

- be proportionate to the likely noise impact (para 5.12.7)
- consider the noise impact of ancillary activities associated with the development (5.12.8)
- assess operational noise with respect to human receptors using the principles of the relevant British Standards and other guidance (5.12.9)

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 (para 5.12.10)
- submit a detailed impact assessment and mitigation plan as part of any development plan (para 5.12.12)

A description of noise generating aspects is set out in Section 14.10 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] and supplemented by ES Volume 3, Appendix 14-4: Noise Modelling [EN010168/APP/6.3].

Identification of noise sensitive receptors is set out in Section 14.5 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1].

The characteristics of the existing noise environment are set out in Section 14.7 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1].

Predicted changes are set out in Section 14.10 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1].

Mitigation is set out in Section 14.9 and Section 14.11 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1].

Proportionality, ancillary activities and British Standards are set out in Section 14.6 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1].

Consultation undertaken is set out in Section 14.2 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1].

An assessment is set out in Section 14.10 and mitigation plan in Section 14.9 of ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1].

NPS EN-5



Key NPS Policy and Guidance	Location of information provided to address key provision of the NPS
Section 2.9: Strategic Network Planning For the assessment of noise from substations, standard methods of assessment and interpretation using the principles of the relevant British Standards are satisfactory (para 2.9.39)	Section 14.6 of the ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] and ES Volume 3, Appendix 14-4: Noise Modelling [EN010168/APP/6.3] set out assessment methodology.

Page 19



Table 9: Relevant NPS Policy for ES Volume 1, Chapter 15: Air Quality

Key NPS Policy and Guidance	Location of information provided to address key provision of the NPS	
NPS EN-1		
Section 5.2: Air Quality and Emissions The applicant's assessment should: • describe existing air quality concentrations and the relative change in air quality from existing levels (Para 5.2.9) • describe 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 (para 5.2.9) • describe the predicted absolute emissions, concentration change and absolute concentrations as a result of the proposed project, after mitigation methods have been applied (para 5.2.9) • describe any potential eutrophication impacts (para 5.2.9) • consider the Environment Targets (Fine Particulate Matter) (England) Regulations 2022 and associated Defra guidance (para 5.2.10) • be consistent with Defra's future national projections of air quality, but may include more detailed modelling and evaluation to demonstrate local and national impacts (para 5.2.11)	Baseline air quality conditions have been considered in Section 15.7 of ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]. Mitigation measures are summarised in Section 15.9 and 15.11 of ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]. An assessment of air quality effects has been undertaken to determine where the Scheme is likely to have adverse impacts on air quality for each phase of the Scheme which is presented in Section 15.10 and 15.12 of ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]. This has included the prediction of concentrations with and without the Scheme, and the change in concentrations as a result of the Scheme, where required. Effects on ecological receptors have been determined as not significant. As such, eutrophication as a result of the Scheme would not be significant and has not been considered further in the assessment. All the relevant legislation and guidance, including the Environment Targets (Fine Particulate Matter) (England) Regulations 2022 and associated Defra guidance has been considered as outlined in Section 15.3 of ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]. Current and future Defra air quality background concentrations, as well as local air quality monitoring, have been used in the assessment of air quality effects to determine where the Scheme is likely to have adverse impacts on air quality. The background concentrations are reported in Section 15.7 of ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]. Detailed modelling of BESS fire emissions has been undertaken, as detailed in Section 15.10 of ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1].	



Table 10: Relevant NPS Policy for ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation

Key NPS Policy and Guidance Location of information provided to address key

provision of the NPS

NPS EN-1

Section 5.13: Socio-Economic Impacts

The applicant is strongly encouraged to engage with relevant local authorities to gain a better understanding of local or regional issues and opportunities (para 5.13.3)

The applicant's assessment should consider all relevant socio-economic impacts which may include:

- creation of jobs and opportunities, including info on the sustainability of jobs created (para 5.13.4)
- contribution to the development of lowcarbon industries (para 5.13.4)
- provision of additional local services and improvements to local infrastructure (para 5.13.4)
- indirect beneficial impacts for the region (para 5.13.4)
- positive and negative effects on tourism and other users of the area impacted (para 5.13.4)
- the impact of a changing influx of workers during the different construction, operation and decommissioning phases of the energy infrastructure (para 5.13.4)
- cumulative effects (para 5.13.4)

The applicant's assessment 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 (para 5.13.5)
- where possible, demonstrate that local suppliers have been considered in any supply chain (para 5.13.6)
- consider developing accommodation strategies where appropriate, especially during construction and decommissioning phases, that would include the need to provide temporary

Current engagement with the local authority is set out at Section 16.2 of ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation IEN010168/APP/6.11.

Preliminary impacts on all scoped-in socio-economic receptors are set out in Section 16.10 of ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1] and supporting ES Volume 3, Appendix 16-1 Legislation, Policy, Guidance and Supporting Information [EN010168/APP/6.3].

Cumulative effects are set out in Section 16.12 of ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1].

Existing socio-economic conditions are set out in Section 16.7 of ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1] and supporting Appendix 16-1 Legislation, Policy, Guidance and Supporting Information [EN010168/APP/6.3].

Socio-economic policy considerations are set out in Section 16.3 of ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1] and supporting Appendix 16-1 Legislation, Policy, Guidance and Supporting Information [EN010168/APP/6.3].

Supply chains and local supply and employment is considered in relation to proposed mitigation in Section 16.9 of ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1].

Accommodation requirements are considered in "socio-demographic" effects in Section 16.10 of ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1] and supporting Appendix 16-1 Legislation, Policy, Guidance and Supporting Information [EN010168/APP/6.3].



Key NPS Policy and Guidance	Location of information provided to address key provision of the NPS
accommodation for construction workers if required (para 5.13.7)	



Table 11: Relevant NPS Policy for ES Volume 1, Chapter 17: Soils and Agriculture

Key NPS Policy and Guidance

Location of information provided to address key provision of the NPS

NPS EN-1

Section 5.11: Land Use, Including Open Space, Green Infrastructure, and Green Belt

The applicant's assessment should:

- The ES should identify existing and planned land uses near the project and assess how the proposed development may impact them - whether by replacing an existing use or preventing neighbouring or planned developments. This assessment should be proportionate to the scale and impact of the project (para.5.11.8).
- Applicants must engage with local communities when proposing to build on existing open spaces, sports facilities, or recreational land. Based on the feedback received during consultation, they should consider providing replacement or additional open space, including green and blue infrastructure (such as parks, green corridors, water features), or new sports and recreational facilities to compensate for any loss resulting from the development. (para 5.11.9)
- In pre-application discussions, the LPA must express any concerns regarding the proposed development's impact on land use. This includes considering how the development aligns with the local development plan, noting any relevant planning applications, and indicating whether they agree with independent assessments that the land may be surplus to current needs (para.5.11.11).
- identify any effects and seek to minimise impacts on soil health and protect and improve soil quality taking into account any mitigation measures proposed (para 5.11.13)
- be 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

ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]

describes the consideration of alternatives carried out by the Applicant in relation to the Site for the Scheme, layouts and choice of technology. Land use is considered in the site selection methodology.

The Applicant has undertaken extensive consultation throughout the development of the Scheme, including with the local community and LPA. This is described in the **Consultation Report [EN010168/APP/5.1]**.

Section 17.8, 17.9 and 17.10 of **ES Volume 1**, **Chapter 17: Soils and Agriculture** [**EN010168/APP/6.1**] identify effects and provide mitigation measures for impacts on soil health and quality.

Section 17.9 of **ES Volume 1**, **Chapter 17: Soils and Agriculture [EN010168/APP/6.1]** sets out the measures taken by the scheme to protect soil and minimise contamination.

Section 17.9 of **ES Volume 1**, **Chapter 17: Soils and Agriculture [EN010168/APP/6.1]** sets out measures taken by the Scheme to present unacceptable risks relating to soils.

ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1] sets out measures taken by the Scheme to prevent unacceptable risks relating to air quality.

ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] sets out measures taken by the Scheme to prevent unacceptable risks relating to noise pollution.

ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1] sets out measures taken by the Scheme to prevent unacceptable risks relating to land instability.



Key NPS Policy and Guidance	Location of information provided to address key provision of the NPS
requirements or are affected by contamination (para 5.11.14)	
contribute to and enhance the natural and local environment by preventing new and existing developments from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability (para 5.11.15)	
NPS EN-3	

Section 2.10: Solar-Photovoltaic Generation 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 (para 2.10.29)
- note that 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 (para 2.10.30)
- explain their choice of site, noting the preference for development to be on suitable brownfield, industrial and low and medium grade agricultural land (para 2.10.31)
- where sited on agricultural land, consideration may be given as to whether the proposal allows for continued agricultural use and/or can be co-located with other functions (for example, onshore wind generation, storage, hydrogen electrolysers) to maximise the efficiency of land use (para 2.10.32)
- note that 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

ES Volume 3, Appendix 4-1 Site Selection Assessment Report [EN010168/APP/6.3] details the assessment undertaken for the site selection of the Scheme, considering previously developed land, brownfield land, contaminated land and industrial land, and avoiding BMV land where possible. It sets out the reason why the Scheme's location was chosen.

Section 17.10 of ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1] sets out the impacts of the Scheme on BMV land.

ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1], and ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1] consider impacts of the Scheme on ecological features and archaeological features, retrospectively.

Section 17.10 of ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1] considers opportunities for continued agricultural use.

Section 17.7 of ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1] and ES Volume 3, Appendix 17-1 Agricultural Land Classification and Soil Resource Survey Report [EN010168/APP/6.3] provides details of the ALC grading for the Scheme, informed by site surveys.

Section 17.9 of ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1] and the Outline Soil Resources Management Plan [EN010168/APP/7.15] explain that a Soil Resources Management Plan will be used to manage soil.



Key NPS Policy and Guidance	Location of information provided to address key provision of the NPS
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 (para 2.10.33) • be 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 (para 2.10.34)	
NPS EN-5	
A case-by-case assessment is required to determine whether the benefits of underground cabling - compared to overhead lines -clearly outweigh any additional economic, social, or environmental impacts. This	ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1] describes the consideration of alternatives carried out by the Applicant in relation to the choice of technology.
assessment should consider the landscape and visual baseline characteristics of the proposed route, the additional cost, and the potentially disruptive environmental effects of undergrounding. It should also take into	Section 17.10 of ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1] considers the construction and operational effects, including the effect on BMV land use.
account the applicant's commitments, as set out in their ES, to mitigate any adverse impacts on agricultural land and soils arising from undergrounding works (para 2.9.25).	Section 17.9 of ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1] sets out mitigation measures incorporated into the Scheme design in relation to agricultural land and soils.



Table 12: Relevant NPS Policy for ES Volume 1, Chapter 18: Human Health

Key NPS Policy and Guidance	Location of information provided to address key provision of the NPS
NPS EN-1	
Section 4.4: Health The applicant's assessment: • 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 (para 4.4.4) • consider the cumulative impact on health in the ES where appropriate (para 4.4.5) • should take opportunities to mitigate indirect impacts, by promoting local improvements to encourage health and wellbeing, this includes potential impacts on vulnerable groups within society and impacts on those with protected characteristics under the Equality Act 2010 (para 4.4.6)	The assessment of all human health receptors scoped in for assessment are set out in Section 18.10 of ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1] and supporting ES Volume 3, Appendix 18-2 Human Health Legislation, Policy and Guidance [EN010168/APP/6.3]. Cumulative effects are set out in Section 18.13 of ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1] and supporting ES Volume 3, Appendix 18-2 Human Health Legislation, Policy and Guidance [EN010168/APP/6.3]. Existing human health conditions and identification of vulnerable groups, including those with protected characteristics under the Equality Act are set out in Section 18.7 of ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1] and supporting ES Volume 3, Appendix 18-2 Human Health Legislation, Policy and Guidance [EN010168/APP/6.3]. Mitigation requirements for human health impacts are set out in Sections 18.9 and 18.11 of ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1] with additional supporting assessment on impacts to groups with protected characteristics set out in the supporting Equality Impact Assessment [EN010168/APP/7.23].



Table 13: Relevant NPS Policy for ES Volume 1, Chapter 19: Ground Conditions

Key NPS Policy and Guidance	Location of information provided to address key provision of the NPS
NPS EN-1	
 Section 5.11: Land Use, Including Open Space, Green Infrastructure, and Green Belt The applicant should: for developments on previously developed land, the applicant ensure that they have considered the risk posed by land contamination and how it is proposed to address this (para 5.11.8) ensure that a site is suitable for its proposed use, taking account of ground conditions and any risks arising from land instability and contamination (para 5.11.17) ensure that they have considered the risk posed by land contamination, and where contamination is present, consider opportunities for remediation where possible (para 5.11.18) 	The risk posed by land contamination is considered in the Annex's to ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1] and is summarised in Table 19-5 of ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1]. The suitability of the land for the proposed use, in the context of the development, is considered in Section 19.11of ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1]. The mitigations for the proposed use, in the context of the development, is considered in Sections 19.10 and 19.12 of ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1].



Table 14: Relevant NPS Policy for ES Volume 1, Chapter 20: Other Environmental Matters

Key NPS Policy and Guidance	Location of information provided to address key provision of the NPS

Major Accidents and Disasters

NPS EN-1

Section 4.13: Safety

The applicant should:

- consult with the HSE on matters relating to safety (para 4.13.5)
- note that applicants seeking to develop infrastructure subject to the COMAH regulations should make early contact with the Competent Authority (para 4.13.6)
- note that if a safety report is required it is important to discuss with the Competent Authority the type of information that should be provided at the design and development stage, and what form this should take. This will enable the Competent Authority to review as much information as possible before construction begins, in order to assess whether the inherent features of the design are sufficient to prevent, control and mitigate major accidents (para 4.13.7)

The Applicant has consulted with HSE as part of the statutory consultation process. This is recorded in Table 20-18 within Section 20.7 of ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1].

The Applicant confirms that the Scheme is not subject to the COMAH Regulations (2015). This is confirmed within the legislation section of Section 20.7 of ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]. This therefore negates the need for a safety report.

Light Pollution

NPS EN-1

Section 5.7 Dust, Odour, Artificial Light, Smoke, Steam and Insect Infestation

The applicant should assess the potential for insect infestation and emissions of odour, dust, steam, smoke, and artificial light to have a detrimental impact on amenity, as part of the ES (para 5.7.5)

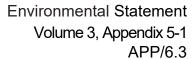
The assessment should describe:

- the type, quantity and timing of emissions
- aspects of the development which may give rise to emissions
- premises or locations that may be affected by the emissions
- effects of the emission on identified premises or locations

ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1] provides an assessment of the likely significant effects on air quality as a result of the Scheme.

Section 15.8 of **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]** sets out the potential impacts on air quality as a result of the Scheme. This includes the type, quantity and timing of emissions.

Section 15.8 of **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]** sets out the aspects of the development which may give rise to emissions.





- measures to be employed in preventing or mitigating the emission (para 5.7.6)
- consult the relevant local planning authority and, where appropriate, the EA about the scope and methodology of the assessment (para 5.7.7)

Location of information provided to address key provision of the NPS

Section 15.10 of **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]** sets out the receptors that may be affected by emissions and the effects of the emissions.

Section 15.9 of **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]** sets out the measures embedded into the Scheme to mitigate against effects from emissions.

Section 15.2 of **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]** outlines the consultation that has taken place with the relevant local planning authority on the scope and methodology of the assessment.

The impacts of artificial light from the Scheme on sensitive receptors are assessed in ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1].

NPS EN-3

Section 2.10: Solar Photovoltaic Generation The applicant should:

 assess the visual impact of security measures, as well as the impacts on local residents, including for example issues relating to intrusion from CCTV and light pollution in the vicinity of the site (para 2.10.47) Security measures, including fencing and CCTV are set out in ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]. Details of site security during the construction and operation of the Scheme is also set out in Section 2.11 the Outline Construction Environmental Management Plan (Outline CEMP) [EN010168/APP/7.12] and Section 2.16 of the Outline OEMP [EN010168/APP/7.13].

Section 8.7 of and Table 8-11 of **ES Volume 1**, **Chapter 8: Landscape and Visual** [EN010168/APP/6.1] consider lighting.

Minerals

NPS EN-1

Section 5.11 Land Use, Including Open Space, Green Infrastructure, and Green Belt

The applicant 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 (para 5.11.19) **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** Section 2 Minerals, paragraphs 20.2.49 to 20.2.60 sets out the assessment of the Scheme in relation to minerals.

Materials and Waste



Lime	Down
	Solar Park

Location of information provided to address key provision of the NPS

NPS EN-1

Section 5.15 Resource and Waste Management

The applicant's assessment:

- should set out the arrangements that are proposed for managing any waste produced and prepare a report that sets out the sustainable management of waste and use of resources throughout any relevant demolition, excavation and construction activities (para 5.15.8)
- note that the arrangements described and a report setting out the sustainable management of waste and use of resources should include information on how re-use and recycling will be maximised in addition to the proposed waste recovery and disposal system for all waste generated by the development. They should also include an assessment of the impact of the waste arising from development on the capacity of waste management facilities to deal with other waste arising in the area for at least five years of operation (para 5.15.9)
- is encouraged to refer to the Waste Prevention Programme for England: Maximising Resources Minimising Waste and should seek to minimise the volume of waste produced and the volume of waste sent for disposal unless it can be demonstrated that this is the best overall environmental outcome (para 5.15.10)
- The UK is committed to moving towards a more 'circular economy'. Where possible, applicants are encouraged to source materials from recycled or reused sources and use low carbon materials, sustainable sources and local suppliers. Construction best practices should be used to ensure that material is reused or recycled onsite where possible (para 5.15.12)
- is encouraged to use construction best practices in relation to storing materials in an adequate and protected place on site to prevent waste, for example, from damage or vandalism. The use of Building Information Management tools (or similar) to record the materials used in construction can help to reduce waste in future decommissioning of facilities, by

Section 1.6 of the Outline Site Waste Management Plan [EN010168/APP/7.16] sets out the arrangements that are proposed for managing any waste produced and the sustainable management of waste and use of resources throughout any relevant demolition, excavation and construction activities.

Section 1.6 of the Outline Site Waste Management Plan [EN010168/APP/7.16] sets out the sustainable management of waste and use of resources and provides information on reuse and recycling. Section 20.4 of **ES Volume** 1, Chapter 20: Other Environmental Topics [EN010168/APP/6.1], provides an assessment of the impact of waste arising from the Scheme.

Section 20.4 of ES Volume 1, Chapter 20: Other Environmental Topics [EN010168/APP/6.1] and Section 1.2 of the Outline Site Waste Management Plan [EN010168/APP/7.16] set out the legislation and planning policy considered as part of the waste assessment, this includes the Waste Prevention Plan for England.

Section 1.6 of the Outline Site Waste Management Plan [EN010168/APP/7.16] sets out the construction materials and waste management measures for the Scheme, including the reuse and recycling and ensuring construction best practices.

Section 1.6 of the Outline Site Waste Management Plan [EN010168/APP/7.16] outlines the material and waste storage and segregation options for the Scheme.



Key NPS Policy and Guidance	Location of information provided to address key provision of the NPS
identifying materials that can be recycled or reused (para 5.15.13)	
Telecommunications	
There is no legislation, policy or guidance considered relevant to the assessment of telecommunications set out within the adopted relevant NPS documents.	n/a
Electromagnetic Fields	
NPS EN-5	
Power frequency EMFs are generated during electricity generation, transmission, distribution, and usage, notably around power lines, cables, and electrical equipment. (para 2.9.44)	ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1] includes a summary of the Applicant's assessment of EMF to those receptors likely to be impacted by EMF.
EMFs consist of electric and magnetic fields. Electric fields are caused by voltage and can be easily blocked by objects like fences or buildings. Magnetic fields result from electric current and are not easily blocked. Both types of fields weaken with distance from their source. (para 2.9.45)	Section 20.1 of ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1] sets out the mitigation measures embedded into the Scheme design.
All overhead power lines generate EMFs, with the strongest levels directly beneath them, decreasing with distance. While undergrounding removes electric fields, magnetic fields remain and are strongest directly above the cable. EMFs may have both direct and indirect impacts on human health. (para 2.9.46).	
 Section 2.10: Mitigation Para 2.10.11: The applicant should consider the following factors: height, position, insulation and protection (electrical or mechanical as appropriate) measures subject to ensuring compliance with the Electricity Safety, Quality and Continuity Regulations 2002; that optimal phasing of high voltage overhead power lines is introduced wherever possible and practicable in accordance with the Code of Practice to minimise EMFs; and any new advice emerging from the Department of Health and Social Care relating to government policy for EMF exposure guidelines. 	

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Key NPS	Policy	and	Guidanco
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Location of information provided to address key provision of the NPS

Glint and Glare

NPS EN-3

Section 2.10: Solar Photovoltaic Generation The applicant:

- should map receptors qualitatively to identify potential glint and glare issues and determine if a glint and glare assessment is necessary as part of the application (para 2.10.103)
- when a quantitative glint and glare assessment is necessary, applicants are expected to consider the geometric possibility of glint and glare affecting nearby receptors, and provide an assessment of potential impact and impairment based on the angle and duration of incidence and the intensity of the reflection (para 2.10.104)
- The depth and detail of any reflectivity (glint and glare) analysis should be tailored to the particular characteristics of your project—its location, layout, and panel design. If your proposal includes solar panels with tracking systems (which move throughout the day or between seasons), you must specifically evaluate how this tracking could create changing patterns of reflection over time (para 2.10.105).
- when a glint and glare assessment is undertaken, the potential for solar PV panels, frames and supports to have a combined reflective quality may need to be assessed, although the glint and glare of the frames and supports is likely to be significantly less than the panels (para 2.10.106)
- 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 (para 2.10.134)
- may consider using screening between potentially affected receptors and the reflecting panels to mitigate the effects (para 2.10.135)
- should minimise the use of security lighting. Any lighting should utilise a

An assessment of the potential impacts of glint and glare is detailed within ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1].

Section 20.1 of ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1] provides an assessment of likely impacts and effects of glint and glare on nearby receptors.

Section 20.1 of **ES Volume 1, Chapter 20: Other Environmental Topics [EN010168/APP/6.1]** sets out the mitigation measures embedded into the design to minimise impacts from glint and glare.

Paragraph 20.1.34 of Section 20.1 of **ES Volume** 1, Chapter 20: Other Environmental Topics [EN010168/APP/6.1] sets out how screening has been considered.

ES Volume 3, Appendix 20-4 Solar Photovoltaic Glint and Glare Study [EN010168/APP/6.3] assesses both fixed south facing and single axis tracking solar panels.

ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1] describes the security measures including lighting that will be incorporated into the Scheme.



Key NPS Policy and Guidance	Location of information provided to address key provision of the NPS
passive infra-red (PIR) technology and should be designed and installed in a manner which minimises impact (para 2.10.133)	



Table 15: Other Documents: Flood Risk Assessment

Key NPS Policy and Guidance

Location of information provided to address key provision of the NPS

NPS EN-1

Section 5.8: Flood Risk

A site-specific flood risk assessment should be provided for all energy projects in Flood Zones 2 and 3 in England (para 5.8.13)

The assessment should:

- identify and assess the risks of all forms of flooding to and from the project and demonstrate how these flood risks will be managed, taking climate change into account (para 5.8.14)
- be proportionate to the risk and appropriate to the scale, nature and location of the project (para 5.8.15)
- consider the risk of flooding arising from the project in addition to the risk of flooding to the project (para 5.8.15)
- 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 (para 5.8.15)
- be undertaken by competent people, as early as possible in the process of preparing the proposal (para 5.8.15)
- 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 (para 5.8.15)
- consider the vulnerability of those using the site, including arrangements for safe access and escape (para 5.8.15)
- 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-ofonset, depth, velocity, hazard and duration (para 5.8.15)
- 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

ES Volume 3, Appendices 11-1 to 11-9: FRA and Drainage Strategy [EN010168/APP/6.3] provide site specific flood risk assessments which include consideration of each Solar PV Site and the Cable Route Corridor.

Section 2 of ES Volume 3, Appendices 11-2 to 11-9: FRA and Drainage Strategy [EN010168/APP/6.3] provides an assessment of flood risk from all forms of flooding and sets out mitigation measures embedded into the Scheme design to manage this.

Section 2 of ES Volume 3, Appendices 11-2 to 11-9: FRA and Drainage Strategy [EN010168/APP/6.3] considers the risk of flooding arising from the Scheme in addition to the risk of flooding to the Scheme.

Section 2.4 of ES Volume 3, Appendix 11-1: FRA and Drainage Strategy – Covering Report [EN010168/APP/6.3] sets out how climate change has been taken into account and paragraph 2.4.6 states the lifetime of the Scheme over which the assessment has been made.

Section 3.2 of ES Volume 3, Appendix 11-1: FRA and Drainage Strategy – Covering Report [EN010168/APP/6.3] considers the flood risk management infrastructure proposed as part of the Scheme.

Safe access and escape will be set out in an emergency escape plan as described in Section 2.12 of the **Outline CEMP** [EN010168/APP/7.12].

Section 2 of ES Volume 3, Appendices 11-2 to 11-9: FRA and Drainage Strategy [EN010168/APP/6.3] considers the different types of flood risk whether from natural or human sources. Section 11.13 of ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] considers the cumulative effects of flood risk.



approach to flood risk management (para 5.8.15)

- 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 (para 5.8.15)
- include the assessment of the remaining (known as 'residual') risk after risk reduction measures have been taken into account and demonstrate that these risks can be safely managed, ensuring people will not be exposed to hazardous flooding (para 5.8.15)
- 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: (para 5.8.15)
- Describe the existing surface water drainage arrangements for the site
- Set out (approximately) the existing rates and volumes of surface water run-off generated by the site. Detail the proposals for restricting discharge rates
- 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
- Demonstrate how the hierarchy of drainage options has been followed.
- Explain and justify why the types of SuDS and method of discharge have been selected and why they are considered appropriate.
- 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
- Describe the multifunctional benefits the sustainable drainage system will provide
- 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

Location of information provided to address key provision of the NPS

Mitigation measures embedded into the design of the Scheme to reduce the causes and impacts of flooding are set out in Section 11.9 of ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] and 3.2 of ES Volume 3, Appendix 11-1: FRA and Drainage Strategy – Covering Report [EN010168/APP/6.3].

The assessment in ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] and ES Volume 3, Appendix 11-1 to 11-9: FRA and Drainage Strategy [EN010168/APP/6.3] considers the effects of a range of flooding events.

Section 11.12 of ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] provides a summary of the residual risks from flooding.

Section 11.7 of ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] describes the existing surface water drainage arrangements and existing rates of surface water run-off.

Section 11.9 of ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] details the proposals for restricting discharge through embedded drainage and surface water management measures.

Section 11.9 of **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** sets out the proposals for managing and discharging surface water from the site using SuDS.

Section 6.3 of ES Volume 3, Appendix 11-1: FRA and Drainage Strategy – Covering Report [EN010168/APP/6.3] sets out how the hierarchy of drainage options has been followed.

The Drainage Strategy in Section 6 of ES Volume 3, Appendix 11-1: FRA and Drainage Strategy – Covering Report [EN010168/APP/6.3] explains and justifies



- Explain how run-off from the completed development will be prevented from causing an impact elsewhere
- 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 (para 5.8.15)
- identify and secure opportunities to reduce the causes and impacts of flooding overall during the period of construction (para 5.8.15)
- be supported by appropriate data and information, including historical information on previous events (para 5.8.15)
- Applicants should begin early engagement with relevant flood risk authorities. Including EA, Lead Local Flood Authorities, Internal Drainage Boards, and other stakeholders like sewerage undertakers or reservoir operators (para 5.8.18).
- If a flood risk authority raises legitimate concerns about a project's potential to cause or be affected by flooding, the applicant is expected to respond constructively. This involves taking reasonable steps to revise the proposal or provide additional evidence to address and resolve those concerns during the application process (para 5.8.20).

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why the types of SuDS and method of discharge have been selected and why they are considered appropriate.

Measure setting out how SuDS have been integrated with other aspects of the Scheme and opportunities to reduce the causes and impacts of flooding are outlined in Section 11.9 of ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] and Section 3.2 of ES Volume 3, Appendix 11-1: FRA and Drainage Strategy – Covering Report [EN010168/APP/6.3].

The operation and maintenance of the SuDS throughout the lifetime of the Scheme is detailed in the **Outline OEMP** [EN010168/APP/7.13].

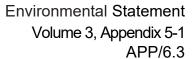
Measures that will ensure the Scheme is safe and remains operational during flooding are set out in Section 11.9 of ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] and Section 3.2 of ES Volume 3, Appendix 11-1: FRA and Drainage Strategy – Covering Report [EN010168/APP/6.3].

Opportunities to reduce the causes and impacts of flooding overall during the period of construction are set out in the Section 11.9 of ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1], Section 3.2 of ES Volume 3, Appendix 11-1: FRA and Drainage Strategy – Covering Report [EN010168/APP/6.3] and the Outline CEMP [EN010168/APP/7.12].

Section 11.6 of ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] sets out the sources of information used to inform the assessment.

Section 11.2 of ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] sets out the preapplication discussions have been undertaken.

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- When a FRA is required, it must be included with the ES. The assessment should consider drainage impacts; however, because solar panels typically drain directly onto the ground, significant drainage issues are unlikely in most solar PV developments. (para 2.10.84)
- Given their temporary nature, solar PV farms should be designed or located to avoid disrupting existing drainage systems and watercourses wherever possible. (para 2.10.86).
- Solar farm developers are advised to avoid culverting existing watercourses or drainage ditches during construction or operation. (para 2.10.87).
- If culverting is unavoidable for access purposes, applicants must demonstrate that no reasonable alternatives exist. Culverting should be limited to the construction phase only and be temporary. (para 2.10.88).

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ES Volume 3, Appendix 11-1: Flood Risk Assessment (FRA) and Drainage Strategy [EN010168/APP.6.3] takes account of drainage impacts and is supported by ES Volume 3, Appendices 11-1 to 11-9: FRA and Drainage Strategy [EN010168/APP/6.3] which provides site specific flood risk assessments which include consideration of each Solar PV Site and the Cable Route Corridor.

ES Volume 3, Appendix 11-1: Flood Risk Assessment (FRA) and Drainage Strategy [EN010168/APP.6.3] addresses culverting.



Table 16: Other documents: Habitat Regulations Assessment

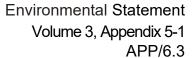
Key NPS Policy and Guidance	Location of information provided to address key provision of the NPS
NPS EN-1	
Section 5.4: Applicant's Assessment – Habitats Regulations • The applicant should seek the advice of the appropriate SNCB and provide the Secretary of State with such information as	Natural England have been consulted for advice on the approach to HRA, as set out in Section 3 of the Habitat Regulations Assessment Report [EN010168/APP/7.10]. Sections 4 to 6 of this report provide
the Secretary of State may reasonably require, to determine whether an HRA Appropriate Assessment (AA) is require (para 5.4.25)	information to determine whether an HRA Appropriate Assessment is required. The Habitat Regulations Assessment
If, during the pre-application stage, the SNCB indicate that the proposed development is likely to adversely impact the integrity of habitat sites, the applicant must include with their application such information as may reasonably be required.	Report [EN010168/APP/7.10] concludes that with the adoption of mitigation measures, no derogation under the Habitat Regulations is required. The Habitat Regulations Assessment
to assess a potential derogation under the Habitats Regulations (para 5.4.26)	Report [EN010168/APP/7.10] concludes that compensation will not be required.
if an applicant disputes the likelihood of adverse impacts, it can provide this information as part of its application 'without prejudice' to the Secretary of State's final decision on the impacts of the potential development (para 5.4.28)	
 compensation will need to be considered as early as possible in the design process as 'retrofitting' measures will introduce delays and uncertainty to the consenting process (para 5.4.29) 	
Applicants should work closely at an early stage in the pre-application process with SNCB and Defra to develop a compensation plan for all protected sites adversely affected by the development. Applicants should engage with the relevant Local Planning Authority at an early stage regarding the proposed location of compensatory measures. Applicants should also take account of any strategic plan level compensation plans in developing project level compensation plans (para 5.4.30)	
Before submitting an application, applicants should seek the views of the SNCB and Defra as to the suitability, securability and effectiveness of the compensation plan to ensure the development will not hinder the achievement of the conservation objectives for the protected site. In cases where such views are provided, the applicant should include a copy of this information with the	

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compensation plan in their application for	
further consideration by the Examining	
Authority (para 5.4.31)	





1.2 References

- Ref 1 Department of Energy Security and Net Zero (DESNZ) (2024) Overarching National Policy Statement for Energy (EN-1). Available at: https://assets.publishing.service.gov.uk/media/65bbfbdc709fe1000f63705 2/overarching-nps-for-energy-en1.pdf
- Ref 2 Department of Energy Security and Net Zero (DESNZ) (2024) National Policy Statement for Renewable Energy Infrastructure (EN-3). Available at: https://www.gov.uk/government/publications/national-policy-statement-for-renewable-energy-infrastructure-en-3
- Ref 3 Department of Energy Security and Net Zero (DESNZ) (2024) National Policy Statement for Electricity Networks Infrastructure (EN-5). Available at: https://www.gov.uk/government/publications/national-policy-statement-for-electricity-networks-infrastructure-en-5