Lime Down
Solar Park

Planning Statement (Clean)

October 2026
Revision 5

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Revision	Section Reference	Description of Changes	Reason for Revision
2	[cover]	Updated to Revision 2	As required for submission at Deadline 1.
	[throughout]	References to Solar PV Sites total area amended to 749.1 ha from 749.3 ha.	Applicant due diligence.
	[throughout]	References to draft National Policy Statement (NPS) updated to 2025 NPS.	Updated due to the adoption of the 2025 version of the NPS on 06 January 2026.
	Paragraph 2.1.5	Amended text to clarify that the design parameters are secured via the draft DCO.	Applicant due diligence.
	Section 6.6	Updated text on the adoption of the 2025 NPS and the transitional arrangements which apply.	Updated due to the adoption of the 2025 version of the NPS on 06 January 2026.
	Paragraph 6.6.24	Updated text to reflect the status of Wiltshire Council's Local Plan review.	Updated to reflect the status of the Local Plan following examination.
	Section 8.3	Amended text to include an appraisal of the Scheme's compliance with NPS EN-1 paragraphs 5.10.32 and 5.10.33.	Applicant due diligence.
	Section 8.3	Updated text to reflect the submission of the Tranquillity Technical Note [PDA-010] at Procedure Deadline A.	Applicant due diligence.
	Section 8.3	Amended text to account for cumulative impacts as a result of the Scheme.	Applicant due diligence.
	Section 8.3	Amended text on food security to account for the now published Land Use Framework (March 2026)	Updated following publication of the Land Use Framework March 2026
	Paragraph 9.4.16	Amended text to account for cumulative impact amendments within the Planning Balance.	Applicant due diligence.
	Annex A Policy Accordance Table	Updated text from the 2025 NPS including clarification of policy wording in accordance with the adopted 2025 NPSs.	Updated due to the adoption of the 2025 version of the NPS on 06 January 2026.
	Annex A Policy Accordance Table	Amended text to include an appraisal of the Scheme's compliance with NPS EN-1 paragraphs 5.10.32 and 5.10.33.	Applicant due diligence.

	Annex A and B Policy Accordance Tables	Amended text to account for cumulative impacts as a result of the Scheme.	Applicant due diligence.
	Annex E - Cotswolds National Landscape Policy and Guidance Accordance Note	Addition in response to the Cotswolds National Landscape Board's relevant representation. Includes further consideration of the Scheme's compliance with relevant Cotswolds National Landscape policy and guidance documents.	Applicant due diligence
3	[cover]	Updated to Revision 3	As required for submission at deadline 2
	[throughout]	Update to paragraph references where planning statement paragraph numbering has changed	Applicant due diligence
	Paragraph 5.3.3	Updated to account for additional information provided in **Written Summary of the Applicant's Oral Submissions and Responses at ISH1 [REP1A-012]** regarding the changes to the Climate Change conclusions if the Scheme were to be operational for 40 years, not 60.	Updated to include details provided at Deadline 1A
	Paragraph 8.2.81	As above	Updated to include details provided at Deadline 1A
	Paragraphs 8.3.17-8.3.24	As above	Updated to include details provided at Deadline 1A
	Paragraph 9.4.6	Update to Planning Balance regarding Climate Change conclusions if the Scheme were to be operational for 40 years, not 60 (conclusions unchanged)	Updated to include details provided at Deadline 1A
	Paragraphs 8.3.220-8.3.225	Clarified text regarding the Scheme's compliance with NPS EN-1 paragraphs 5.10.32 and 5.10.33.	Applicant due diligence
	Annex A: National Policy Accordance Tables	Update to NPS EN-1 accordance table to clarify text regarding paragraph 5.10.32	Applicant due diligence

	Annex E: Cotswolds National Landscape Policy and Guidance Accordance Note	Update to clarify visual effects on receptors within or adjacent to the CNL	Applicant due diligence
4	[cover]	Updated to Revision 4	As required for submission at deadline 3
	Paragraphs 8.3.17 and 9.4.6	Updated to refer to further sensitivity analysis carried out in Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [REP3-132] (submitted at Deadline 3)	As required for submission at deadline 3
	Annex C, paragraphs 5.2.8 to 5.2.11	Updated to reflect additional information provided in response to Written Question FHW1.8 regarding wider sustainability benefits proposed to assist with reducing flood risk in the wider community	In response to Written Question FHW1.8
	Paragraph 1.1.2 and throughout annexes	References to 50 MW updated to 100 MW	Updated to reflect updated NSIP threshold from 50 to 100 MW
5	Various	Updates to references to NPPF to accord with new August 2026 NPPF	Updated for newly published NPPF
	Various	Updates examination library references	To reflect updated versions of documents in the examination library
	Paragraphs 3.4.1 to 3.4.3 including tables 3-1 and 3-2	Updates to ALC survey figures across the Solar PV Sites and the Cable Route Corridor to reflect adjusted figures in Chapter 17: Soils and Agriculture [REP3-021] (updated at deadline 3)	To reflect updated ES chapter
	Paragraph 6.6.25 and various	Removal of references to Wiltshire's Draft Local Plan following its withdrawal from examination	To reflect withdrawal of draft local plan
	Paragraphs 4.5.9 to 4.5.13 and 8.3.342	Updates to reflect updated transport movement numbers in ES Chapter	To reflect updated ES chapter submitted at deadline 7

	Paragraphs 4.6.3, 4.6.6, 5.3.14, 8.2.42, 8.2.53, and 9.4.7	Updated to include most up to date BNG calculations as per the Biodiversity Net Gain Assessment Report [REP6-024] submitted for deadline 6	To reflect updated ES chapter
	Paragraph 5.3.3, 5.3.5, 8.3.18-8.3.21 and 8.3.24	Figures updated to reflect updated version of Chapter 7: Climate Change [REP5-022] submitted at Deadline 5	To reflect updated ES chapter
	Paragraph 8.3.125	Updated reference to number of archaeological assets with significant effects before mitigation to reflect Chapter 12: Cultural Heritage [REP3-017]	Applicant due diligence
	Paragraph 8.3.177	Updated to reflect reduction in number of transport receptors experiencing significant adverse visual effects following design evolution during examination (removal of panels)	To reflect other updated Application documents following change request
	Paragraphs 8.3.183 and 9.4.12	Updated references to clarify that only parts of Lime Down A, B and C are within the setting of the Cotswolds National Landscape	Applicant due diligence
	Paragraphs 8.3.185 and 9.4.12	Wording amended to “barely discernible” to mirror wording used in ES Volume 3 Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [REP6B-007] and Chapter 8: Landscape and Visual [REP6B-005]. Paragraph 8.3.185 also updated to mirror wording in Chapter 8.	To reflect ES chapters
	Paragraph 8.3.188	Amended to account for removal of significant effects 3 roads through design evolution during examination, thereby reducing number of roads affected from 5 to 2.	As per updated version of ES Volume 3 Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [REP6B-007] submitted at deadline 6B.
	Paragraph 8.3.190	Updated to reflect that solar panels are no longer proposed in fields A1 and C9 following consultation with the CNLB during examination.	To reflect updated documents

	Paragraph 8.3.223 and table 8-1	Amended to reflect removal of significant visual effects through design evolution during examination, thereby reducing number of receptors which have a visual relationship with the CNL and experience significant visual effects from 8 to 5.	Now in line with updated version of ES Volume 3 Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [REP6B-007] submitted at deadline 6B.
	Paragraphs 8.3.253, 8.3.257 and 8.3.260	Updates to reflect changes in the NPPF including removal of Written Ministerial Statement on food security, together with updates to reflect the additional Farming and Food Security Technical Note [REP4-079] submitted at Deadline 4 of the Examination	To reflect updated NPPF and additional documents submitted during examination
	Paragraph 8.3.309	Updated to reference the Equine Business Report [REP5-105] and the Technical Note on Impacts to Non-Equine Businesses [REP5-511] submitted at Deadline 5.	To reflect new documents
	Paragraph 9.4.12	Updated to clarify that 10 PRoW experience significant adverse visual effects, not 11	Applicant due diligence
	Annex A	Updated NPPF Planning Policy Accordance Table. **Please note that other accordance tables have not been updated, but should be read against this planning statement and the most recent versions of the Application documents including ES chapters and management plans**	To reflect August 2026 version of the NPPF
	Annex B	Removal of Accordance Table for Wiltshire's Draft Local Plan following its withdrawal from examination. **Please note that other accordance tables have not been updated, but should be read against this planning statement and the most recent versions of the Application documents including ES chapters and management plans**	To reflect the withdrawal of Wiltshire's Draft Local Plan
	Annex C	updates generally to accord with new August 2026 NPPF. Update to paragraph 4.1.2 to align with updated wording in paragraph 11.9.2 of ES Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012] (as updated for Deadline 4).	In line with updated documents

	Annex E	Amended to reflect reduction in number of visual effects as per updated version of ES Volume 3 Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [REP6B-007] submitted at deadline 6B. Amendments to footnotes 1,2 and 3 to reflect the new August 2026 NPPF. Updates to account for adjusted figures in Chapter 7: Climate Change submitted at Deadline 5	In line with updated documents

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Executive Summary

E-1. This Planning Statement has been prepared by Lime Down Solar Park Limited (the Applicant) in relation to an application for a Development Consent Order (DCO Application) for Lime Down Solar Park (the Scheme).

E-2. It provides an assessment of the Scheme against the relevant policy and legislative framework. It draws upon the conclusions of the Environmental Statement (ES) and other reports forming the DCO Application to appraise whether the Scheme complies with planning policy.

E-3. **Section 5** sets out the needs and benefits of the Scheme. The government has confirmed that there is a critical national priority (CNP) for nationally significant low carbon infrastructure such as the Scheme and government policy supports the development of large-scale solar projects to meet its targets for decarbonisation, security of supply and affordability to end users. The Scheme will significantly contribute to the government meeting these aims through the provision of low carbon and affordable electricity and in doing so, it would be a critical part of the national portfolio of renewable energy generation. The Scheme will also deliver more localised economic and environmental benefits. These include employment generation, the creation of 12.8 km of new permissive paths and ecological and landscape enhancements.

E-4. The DCO Application will be determined in accordance with section 104(2) of the Planning Act 2008, which provides that in deciding the application, the Secretary of State must have regard to "*any national policy statement which has effect in relation to development of the description to which the application relates (a "relevant national policy statement")"* together with any local impact reports, any prescribed matters and any other matters which the Secretary of State thinks are important and relevant to the decision.

E-5. The relevant National Policy Statements (NPS) in relation to the Scheme are the Overarching National Policy Statement for Energy (NPS EN-1), the National Policy Statement for Renewable Energy Infrastructure (NPS EN-3) and the National Policy Statement for Electricity Networks Infrastructure (NPS EN-5). This Planning Statement demonstrates the Scheme's compliance in relation to national policy.

E-6. Wiltshire Council and South Gloucestershire Council are the host local authorities for the Scheme and will have the opportunity to prepare local impact reports following submission of the DCO Application. This Planning Statement also considers local planning policy.

E-7. Prescribed matters that are relevant to the DCO Application are set out in the Infrastructure Planning (Decisions) Regulations 2010 (as amended) (the Decisions Regulations) and include Regulation 3 (regard to preserving listed buildings, conservation areas and scheduled monuments) and Regulation 7 (regard to the United Nations Environmental Programme Convention on Biological Diversity of 1992). This Planning Statement demonstrates the Scheme's compliance with the relevant prescribed matters.

E-8. Other national and local policies considered relevant are explained in **Section 6** of this Planning Statement including relevant local plans, and the Scheme's compliance with them is appraised in **Section 8.**

E-9. **Section 9** of this Planning Statement applies the planning balance in relation to the beneficial and adverse effects of the Scheme. It concludes that adverse effects have been appropriately managed and that the residual adverse effects are outweighed by the benefits. **Section 9** also considers the CNP presumption and concludes that given the Applicant has demonstrated the Scheme is in accordance with national policy, the mitigation hierarchy has been applied and compliance with other legal and regulatory requirements has been demonstrated, the CNP presumption applies to the Scheme and accordingly should be taken into account in decision making.

E-10. Given the urgent need for large scale solar development and the substantial benefits of the Scheme, there is a clear and compelling case for the DCO to be made.

1 Introduction

1.1 Background

1.1.1 This Planning Statement has been prepared by Lime Down Solar Park Limited (the Applicant) in relation to an application for a Development Consent Order (DCO Application) for Lime Down Solar Park (the Scheme). The DCO Application is submitted to the Planning Inspectorate, with the decision on whether to grant a Development Consent Order (DCO) being made by the Secretary of State for Energy Security and Net Zero (the Secretary of State) pursuant to the Planning Act 2008 (Ref-1) (PA 2008).

1.1.2 The Scheme comprises a solar photovoltaic (PV) electricity generating station of over 100 megawatts (MW) and associated development comprising Battery Energy Storage System (BESS) with an export capacity of approximately 500 MW, substations, grid connection infrastructure, and other infrastructure integral to the construction, operation and maintenance, and decommissioning phases.

1.1.3 The PV electricity generating station and BESS would be contained within five land parcels referred to as Lime Down A, B, C, D and E (hereafter collectively referred to as the 'Solar PV Sites').

1.1.4 The Cable Route Corridor is the area within which the export connection cables (hereafter referred to as the 'Grid Connection Cables') would be located to connect the Solar PV Sites to the National Grid at the existing Melksham Substation (hereafter referred to as the 'Existing National Grid Melksham Substation') and the area within which cables connecting the Solar PV Sites would be located (hereafter referred to as 'Interconnecting Cables').

1.1.5 The Scheme location and the Order Limits are shown in **ES Volume 2, Figure 1-1: Scheme Location [APP-075].** The Scheme would be contained within the Order Limits (also referred to as 'the Site') which comprises the Solar PV Sites, the Cable Route Corridor, the works at Existing National Grid Melksham Substation and the Highways Improvements Areas, as shown in **ES Volume 2, Figure 2-1: Elements of the Site [APP-077]**. The land within the Order Limits and its surroundings are described in **ES Volume 1, Chapter 2: The Order Limits [APP-054].**

1.1.6 The Order limits comprise a total area of 1,237 hectares (ha) of land. Of this, the Solar PV Sites comprise a total area of 749.1ha.

1.1.7 The Order Limits are predominantly located within the administrative area of Wiltshire Council. Two small areas of existing highway (being junctions onto the A46), totalling 0.15 ha, are located within the administrative area of South Gloucestershire Council.

1.1.8 As discussed further in this Planning Statement, the Scheme provides an opportunity to substantially contribute to the UK's portfolio of renewable energy generation, which is urgently needed to meet the Government's decarbonisation targets. National planning policy identifies a critical national priority for low carbon generation infrastructure and solar is identified in Government policy documents as a critical part of the UK's strategy to achieve net zero by 2050, with the ambition to triple solar generation by 2030 (for more information, see the **Statement of Need [REP1-085]**). The Scheme will help to ensure that the UK remains on track to meet its legally binding carbon emissions reduction targets, while enhancing security of supply, and, given that solar is among the cheapest form of electricity generation in the UK, provides value for money for end-use consumers.

1.1.9 The Scheme has evolved iteratively in consideration of the Applicant's design principles (discussed further in the **Design Approach Document [APP-268]**), consultation responses and the Environmental Impact Assessment (EIA) process including additional surveys and fieldwork as the project has progressed. As a result, the Scheme is anticipated to have few significant adverse environmental impacts relative to the benefits projected to be delivered. An appraisal of the effects of the Scheme, proposed mitigation measures and the Scheme's overall compliance with planning policy is dealt with in **Section 8** of this Planning Statement, and **Section 9** sets out the planning balance.

1.2 The Applicant

1.2.1 The Scheme is being developed by the Applicant. The Applicant is part of Island Green Power Limited (IGP), which was established in 2013.

1.2.2 IGP has more than 11 years' worth of experience in delivering renewable energy projects in 8 countries including England, Scotland, Northern Ireland, Wales, Spain, Australia and New Zealand. IGP has successfully delivered 38 projects worldwide with a total of more than 2.5G W of energy capacity. This includes 21 projects in the UK. These range in size from below 5 MW to Nationally Significant Infrastructure Projects (NSIPs). Further information on the Applicant can be found in the **Funding Statement [REP5-016]**.

1.2.3 IGP has a proven track record with the DCO application process. IGP is the recipient of a granted DCO for the Cottam Solar Project in Lincolnshire and Nottinghamshire, which was consented on 5 September 2024 (Planning Inspectorate Case Reference: EN010133) and of a granted DCO for the West Burton Solar Project in Lincolnshire and Nottinghamshire, which was consented on 24 January 2025 (Planning Inspectorate Case Reference: EN010132).

1.3 Legislative Context Review

1.3.1 The Scheme is an onshore generating station in England (which does not generate electricity from wind) with a generating capacity exceeding 100 MW and is therefore classed as a NSIP under sections 14(1)(a), 15(1) and 15(2) of the PA 2008. The PA 2008 requires a DCO to be obtained for the development of NSIPs.

1.3.2 Section 115(1)(b) of the PA 2008 provides that a DCO can include consent for 'associated development', which is development that is not an NSIP in its own right, but that is associated with the delivery of a NSIP. The elements of the Scheme that constitute the NSIP and the elements that constitute associated development are defined in Schedule 1 of the **Draft DCO [REP6-005]** and are summarised in **Section 4.3** of this Planning Statement.

1.3.3 The Scheme is 'EIA Development' as defined by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations') (Ref-2). An EIA has been undertaken and is reported in the **Environmental Statement [EN010168/APP/6.1 to EN010168/APP/6.4]** submitted with the DCO Application. In undertaking the EIA and preparing the **ES [EN010168/APP/6.1 to EN010168/APP/6.4]**, the Applicant has taken account of the EIA Scoping Opinion received adopted by the Secretary of State on 22 August 2024, which can be found in **Appendix B: EIA Scoping to the Consultation Report [APP-024]**.

1.4 Pre-Application Consultation

1.4.1 The Applicant has undertaken extensive consultation throughout the development of the Scheme. This is described in the **Consultation Report [APP-022]** and includes the stages listed below.

- Early engagement with local authorities and statutory consultees during quarter 4 of 2023;
- Non-statutory public consultation for 6 weeks between 14 March and 26 April 2024;
- Statutory Consultation for 7 weeks between 29 January and 19 March 2025; and
- Targeted consultation regarding localised changes (comprising of changes to the development boundary to include highway improvement areas and other minor adjustments) for 5 weeks between 3 June and 11 July 2025.

1.4.2 The Applicant has had regard to all feedback received in response to the consultations when developing the Scheme, as set out in the **Consultation Report [APP-022]**.

1.4.3 In particular, the Applicant has adapted the Scheme following feedback from Wiltshire Council and the Cotswolds National Landscape Board to minimise adverse effects on the Cotswolds National Landscape (CNL). The Applicant has adopted a "landscape led" approach to design, giving due weight to the intrinsic character and beauty of the surrounding countryside (discussed in the **Design Approach Document [APP-268]**). In line with that approach and consultation feedback, the Applicant has removed fields from the Order Limits in areas close to the CNL, and removed panels from retained fields in others, in order to minimise adverse effects on the CNL and to seek to further the purposes of conserving and enhancing the natural beauty of the CNL. Compliance with the Cotswolds National Landscape Management Plan 2025-2030 and the relevant CNL position statements has been demonstrated, as set out in **Annex E** of this Planning Statement.

1.5 Supporting Documents

1.5.1 This Planning Statement draws on the evidence and information set out in the other documents that accompany the DCO Application when assessing the Scheme against planning policy and drawing conclusions on planning compliance. This Planning Statement should be read alongside the following documents:

- **Draft Development Consent Order (Draft DCO) [REP6-005]**;
- **Consultation Report APP-022]**;
- **Environmental Statement [EN010168/APP/6.1], Figures EN010168/APP/6.2], Appendices [EN010168/APP/6.3] and Non-Technical Summary [EN010168/APP/6.4]**;
- **Statement of Need [REP1-085]**;
- **Design Approach Document [APP-268]**;
- **Design Principles and Parameters [REP4-043]**;
- **Statutory Nuisance Statement [APP-271]**;
- **Biodiversity Net Gain (BNG) Assessment Report [REP6-024]**;
- **Outline Construction Environmental Management Plan (CEMP) [REP6-029]**;
- **Outline Operational Environmental Management Plan (OEMP) [REP6-031]**;
- **Outline Decommissioning Strategy [REP6-033]**;
- **Outline Soil Resources Management Plan [REP6-035]**;

- **Outline Public Rights of Way (PRoW) and Permissive Paths Management Plan [REP1-104]**;
- **Outline Landscape and Ecological Management Plan (LEMP) [REP6-037]**;
- **Outline Skills, Supply Chain and Employment Plan (SSCEP) [REP3-104]**;
- **Outline Battery Safety Management Plan [REP3-106]**; and
- **Outline Construction Traffic Management Plan (CTMP) [REP6-041]**.

1.6 Purpose and Structure of this Planning Statement

1.6.1 This Planning Statement is submitted to support the DCO application, in accordance with regulation 5(2)(q) of the Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 (as amended) (the APFP Regulations) (Ref-3).

1.6.2 The purpose of this document is to provide an overview of the Scheme and its impacts, and to present the Applicant's consideration of the Scheme against the provisions of the legislation and policies considered relevant to the Secretary of State's decision.

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

- **Section 2:** describes the design approach which has informed the design development of the Scheme;
- **Section 3:** describes the site context, including land within the Order Limits and surrounding areas, and summarises the relevant planning history;
- **Section 4:** provides a summary of the Scheme and its components;
- **Section 5:** describes the need for, and benefits of, the Scheme;
- **Section 6:** provides an overview of the decision-making framework including legislation and policy context as well as other important considerations;
- **Section 7:** sets out plans for ongoing engagement through statements of common ground post-submission;
- **Section 8:** provides an assessment of the Scheme against the relevant legislative and policy context as well as other important and relevant considerations;

- **Section 9:** applies the planning balance of the Scheme and sets out how the Scheme complies with the PA 2008;
- **Section 10:** provides an overall conclusion in terms of the Scheme's compliance with relevant legislation and policy;
- **Annex A: National Policy Accordance Tables:** sets out an appraisal of the Scheme against the policies in the relevant NPS;
- **Annex B: Local Policy Accordance Tables:** sets out an appraisal of the Scheme against relevant and important local policies;
- **Annex C: Sequential and Exception Test:** sets out how the sequential test has been applied at site selection and in the layout of the Scheme, and how the Scheme meets the exception test;
- **Annex D: Planning History**: sets out the relevant planning applications that are located close to the Scheme; and
- **Annex E: Cotswolds National Landscape Policy and Guidance Accordance Note**: sets out the Scheme's compliance with the Cotswolds National Landscape Management Plan 2025-2030 and other relevant guidance relating to the Cotswolds National Landscape.

2 Design Approach

2.1.1 The achievement of good design for NSIPs is a key requirement of national planning policy and the Applicant fully recognises the importance of achieving good design outcomes for the Scheme. The key policy documents that have informed the approach to good design include Overarching National Policy Statement for Energy (NPS EN-1), (Ref-5) the National Policy Statement for Renewable Energy Infrastructure (NPS EN-3) (Ref-6), the Planning Inspectorate's guidance note 'Nationally Significant Infrastructure Projects: Advice on Good Design" (Ref-48), the Wiltshire Core Strategy (Ref-23), and Made Neighbourhood Plans (Ref-27). The full list of planning policies regarding design and an analysis of the Scheme's compliance with them is set out in **Section 8: Planning Appraisal, Annex A: National Policy Accordance Tables, and Annex B: Local Policy Accordance Tables** of this Planning Statement.

2.1.2 IGP has adopted eight company-wide 'global design principles' for its projects, intended to ensure that the design of IGP projects deliver direct benefits to communities, enhance biodiversity, control any adverse effects on the local environment throughout the lifecycle of projects, and help tackle climate change by harnessing and storing renewable energy. These IGP company-wide design principles are discussed further in the **Design Approach Document [APP-268].**

2.1.3 In line with IGP's company-wide design principles, the Applicant also developed a set of nine project-level Design Principles early in the Scheme's development which have been used to inform design development for the Scheme (the Design Principles). These Design Principles were developed in response to the Design Vision of the Scheme, which is:

"To efficiently deliver low-carbon, renewable energy and make a substantial contribution to the Government's solar deployment target (45-47GW by 2030) and legal obligations to deliver net zero and achieve energy security whilst being sensitive to, and exploring opportunities to enhance, the surrounding communities and land uses in Wiltshire."

2.1.4 The main purpose of the Design Vision was to ensure that the Scheme comprises sustainable infrastructure that is sensitive to place, and to ensure that the design is held together by a clear goal.

2.1.5 The Design Principles are based on an understanding of the Scheme's context, the people it would affect, and the potential benefits and outcomes it can deliver. The Design Principles drive design-related decision making throughout the Scheme's lifecycle, providing a framework for development of the design over the course of the pre-application

stage. Furthermore, the Design Principles informed the design parameters which are secured in the **Draft DCO [REP6-005]** and will be applied to the detailed design of the Scheme post consent.

2.1.6 The Scheme specific Design Principles are set out below:

1. The design of the Scheme will be 'Landscape Led' and give due weight to the intrinsic character and beauty of the surrounding countryside;
2. Adherence to the mitigation hierarchy to reduce impacts and control any adverse effects on the environment throughout the lifecycle of the Scheme from construction through to operation and maintenance and decommissioning;
3. The Scheme will deliver a minimum 10% net gain for biodiversity through strategic habitat creation and enhancement measures;
4. The Scheme design will retain a degree of flexibility to enable it to adapt over time, be functional and fit for purpose, and respond to innovative and new technologies as well as building resilience to climate change;
5. The Scheme will be carefully designed to minimise where practicable impacts on amenity from air quality, traffic and noise effects and safeguard the health and safety of local residents by securing suitable control measures during construction, operation and maintenance and decommissioning of the Scheme;
6. The Scheme will protect the water environment by adhering to good pollution control practice and be resilient from flooding both now and in the future and not increase the risk of flooding elsewhere;
7. The design of the Scheme will be sensitive to above and below ground heritage assets and their setting, by locating infrastructure at a suitable distance and through appropriate landscape screening;
8. The Scheme will be sensitive to existing land uses where practicable and maximise opportunities to strengthen green and blue infrastructure; and
9. The Scheme will seek to minimise the effects of the development on PRoW by incorporating measures to maintain, and where practicable, explore opportunities to improve the local footpath network.

2.1.7 These Design Principles were consulted upon during the Scheme's Statutory Consultation. The responses to these are set out in the **Consultation Report Appendices [APP-023 to APP-051]**, however the design principles did not change as a result of the comments made**.** The Design Principles are set out in full in the **Design Approach Document**

[APP-268] together with commentary on how they have influenced design evolution of the Scheme to date.

3 Site Context

3.1 Introduction

3.1.1 The following sections summarise: the existing context, the environmental designations, and other planning considerations of the land within and surrounding the Order Limits; and relevant planning history.

3.1.2 A detailed description of the Order Limits is set out in **ES Volume 1, Chapter 2: The Order Limits [APP-054]**.

3.2 Site Description

3.2.1 The Order Limits comprise a total area of 1,237 ha of land located largely within the administrative area of Wiltshire Council, with two small areas of existing highway within the administrative area of South Gloucestershire Council. The Order Limits are made up of the Solar PV Sites, the Cable Route Corridor, the Existing National Grid Melksham Substation and the Highway Improvement Areas. Each is discussed below.

Solar PV Sites

3.2.2 The Solar PV Sites comprise a total area of 749.1 ha and is presented on **ES Volume 2, Figure 2-1: Elements of the Site [APP-077]**. The area and National Grid Reference (NGR) for each individual Solar PV Site is as follows:

- Lime Down A comprises an area of 94.3 ha and is centred on NGR ST 86281 84700;
- Lime Down B comprises an area of 70 ha and is centred on NGR ST 88571 85010;
- Lime Down C comprises an area of 241 ha and is centred on NGR ST 86198 83092;
- Lime Down D comprises an area of 212.5 ha and is centred on NGR ST 89705 83780; and
- Lime Down E comprises an area of 131.3 ha and is centred on NGR ST 92698 81906.

3.2.3 The land within the Solar PV Sites primarily comprise agricultural fields with gently undulating topography, delineated by hedgerows, hedgerow trees, scattered woodland and woodland blocks. The Fosse Way, a Roman road built between Exeter and Lincoln (now part road and part PRoW), runs southwest-northeast through Lime Down C and on the border of Lime Down B. Various PRoW cross the Solar PV Sites. Watercourses within the Solar PV Sites include Gauze Brook running

through the eastern extent of Lime Down D and Gabriel's Well River running through the centre of Lime Down E, as well as various unnamed drains.

3.2.4 The landscape surrounding the Solar PV Sites comprises further fields, woodland and nearby rural villages and hamlets, including Sherston (approximately 300 m north of Lime Down A), Luckington (approximately 830 m west of Lime Down C), Corston (approximately 480 m east of Lime Down D), Hullavington (approximately 700 m south of Lime Down D), and Rodbourne (approximately 150 m northeast of Lime Down E). The town of Malmesbury is located approximately 3 km northeast of Lime Down B. There are also several individual farm holdings, rural dwellings and small commercial business properties in the vicinity of the Solar PV Sites. The Great Western Railway South Wales Main Line runs east to west to the south of Lime Down D and intersects Lime Down C and Lime Down E. The River Avon is located approximately 240 m north of Lime Down A.

Cable Route Corridor

3.2.5 The Cable Route Corridor has a width of 50 m but broadens to up to 665 m in some limited locations to provide sufficient space for use of trenchless construction techniques and temporary construction compounds or to provide a wider area to allow space to avoid features such as trees, hedgerows and field boundaries. It runs for approximately 22 km from Lime Down D to the Existing National Grid Melksham Substation, as well as connecting each of the Solar PV Sites. It covers a total area of approximately 463.2 ha centred on approximately NGR ST 88369 73688. The Cable Route Corridor is presented in **ES Volume 2, Figure 2-1: Elements of the Site [APP-077]**.

3.2.6 The land within the Cable Route Corridor predominantly comprises agricultural fields, bordering hedgerows and short sections of road and railway line where crossings are required (including a crossing of the M4 motorway). The Cable Route Corridor is intersected by various tributaries associated with the River Avon.

3.2.7 The landscape surrounding the Cable Route Corridor comprises further agricultural fields, hedgerows, woodland and villages such as Grittleton (bordering to the west), Yatton Keynell (approximately 220 m to the west) and the towns of Chippenham, Corsham and Melksham towards the southern section of the Cable Route Corridor.

Existing National Grid Melksham Substation

3.2.8 The Existing National Grid Melksham Substation is owned and operated by National Grid. The works required at the Existing National Grid Substation in relation to the Scheme will require a total area of 12.8 ha.

3.2.9 The Existing National Grid Melksham Substation is immediately bordered by trees. Open fields, further trees and hedgerows and Whitley Golf Club separate the substation compound from the nearby settlements of Whitley (to the west), Beanacre (to the east) and Melksham (to the south).

Highway Improvement Areas

3.2.10 The Highway Improvement Areas comprise various sections of existing highway within the administrative areas of Wiltshire Council and South Gloucestershire Council to facilitate access to the Solar PV Sites and Cable Route Corridor. The total area of the Highways Improvement Areas is approximately 17.8 ha (5.9 ha of which overlaps with the Cable Route Corridor) and 0.15 ha of the Highways Improvement Areas are within the administrative area of South Gloucestershire Council. Works within the Highways Improvement Areas comprise improvements to the existing highway, minor works to enable construction vehicle movements, and provision of visibility splays.

3.3 Environmental Designations Within and Surrounding the Order Limits

3.3.1 Key environmental planning constraints within and surrounding the Order Limits are shown on **ES Volume 2, Figure 2-3: Environmental and Planning Constraints [APP-079]**. Further details regarding the Order Limits and the surrounding areas are provided in **ES Volume 1, Chapter 7** to **Chapter 20 [REP5-028]**.

Landscape

3.3.2 The Order Limits are situated within and in proximity to a number of local to national landscape character areas. The northern boundary of Lime Down A and western boundary of Lime Down B and Lime Down C are located within 10 m of the Cotswolds National Landscape (CNL). Minor highway improvement works within the Highway Improvement Areas would be undertaken within the CNL (refer to **ES Volume 2, Figure 8-6: Landscape Receptors [APP-095]**).

3.3.3 Lime Down A, C, the western part of Lime Down B and the most westerly part of Lime Down D are situated within the Cotswolds National Character Area (NCA Profile: 107 Cotswolds (NE420). The remainder of Lime Down B D, and the entirety of Lime Down E are situated within the Avon Vales National Character Area (NCA Profile: 117 – Avon Vales (NE522). The National Character Areas are shown on **ES Volume 2, Figure 8-5-1: National and Regional Landscape Character Areas [APP-094].**

3.3.4 A full baseline description, including details of all national, regional and local character assessments, is provided within **ES Volume 1, Chapter 8: Landscape and Visual [REP3-026]**.

Ecology and Biodiversity

3.3.5 There are no statutory internationally designated ecological sites located within 10 km of the Order Limits. There are four statutory internationally designated ecological sites located within 30 km. These include the Bath and Bradford on Avon Bats Special Area of Conservation (SAC), Severn Estuary Special Protection Area (SPA) and Ramsar, and Salisbury Plain SPA (refer to **ES Volume 2, Figure 9-1-1: International Statutorily Designated Sites within the Search Area [APP-107]**).

3.3.6 There are four statutory nationally designated ecological sites located outside of, but within 5 km of the Order limits. These are Harries Ground, Rodbourne Site of Special Scientific Interest (SSSI); Corston Quarry and Pond Local Nature Reserve (LNR); Sutton Lane Meadows SSSI; and Conygre Mead LNR.

3.3.7 There are 37 non-statutory locally designated sites located outside of, but within 2 km of, the Order Limits. These comprise 36 Local Wildlife Sites (LWS) and one Protected Road Verge.

3.3.8 A full baseline description is provided within **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010]** and associated appendices.

Flood Risk

3.3.9 The Order Limits are situated within the Severn River Basin Management Plan (RBMP) area, specifically within the Avon Bristol and North Somerset Streams Management Catchment. The majority of the Solar PV Sites and Cable Route Corridor are located within Flood Zone 1 with a low risk of fluvial flooding. However, there are also limited areas of Flood Zone 2 and Flood Zone 3 with a medium and high risk of fluvial flooding, respectively, within Lime Down B, C, D and E and the Cable Route Corridor. The Solar PV Sites and Cable Route Corridor are generally at a very low risk to surface water flooding with limited areas of low to high risk along watercourses and drains. The risk of fluvial and surface water flooding is described in the Flood Risk Assessment and Drainage Strategy at **ES Volume 3, Appendix 11-1 to Appendix 11-9 [REP4-021 to REP4-035 and REP3-064]**.

3.3.10 A full baseline description is provided within **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012]** and a Flood Risk Assessment and Drainage Strategy is presented as **ES Volume 3, Appendix 11-1 to Appendix 11-9 [REP4-021 to REP4-035 and REP3-064]**.

Cultural Heritage

3.3.11 There are no World Heritage Sites, Registered Battlefields, or Protected Wrecks within 2 km of the Solar PV Sites and 250 m of the Cable Route Corridor. No designated heritage assets are located within the Solar PV Sites, however, various Listed Buildings, Scheduled Monuments, Conservation Areas are located within 2 km of the Solar PV Sites. There are also various designated heritage assets within 250 m of the Cable Route Corridor, including two Grade II Listed Buildings within the Cable Route Corridor as shown on **ES Volume 2, Figure 12-1: Designated and Non Designated Heritage Assets Scoped in for Assessment [APP-143]**.

3.3.12 Forty-seven records of non-designated archaeological assets are present within the Solar PV Sites according to the Wiltshire Historic Environment Records (HER), as well as an additional 53 areas of potential archaeological interest and 37 Historic Landscape Character (HLC) units. There are 588 records of non-designated archaeological assets present within the Cable Route Corridor.

3.3.13 A full baseline description is provided within **ES Volume 1, Chapter 12: Cultural Heritage [REP3-017]** and associated appendices.

3.4 Other Planning Considerations Within and Surrounding the Order Limits

Agricultural Land

3.4.1 . The majority of the land in the Solar PV Sites is agricultural land. Across the Solar PV Sites, the land is primarily in arable use, with some areas of grassland in Lime Down B, C and E. The ALC grading for the Solar PV Sites, as informed by soil surveys, is set out in **Table 3-1** below. The majority of the Solar PV Sites (505 ha, 68%) comprise land within Subgrades 3b and 4 and therefore is not best and most versatile (BMV) agricultural land. Approximately 233 ha (32%) of the Solar PV Sites is classified as BMV quality, mostly in Subgrade 3a (the lowest grade of BMV land) with a small proportion of Grade 2. There is no Grade 1 land (being the highest grade) within the Solar PV Sites.

Table 3-1: ALC Areas of the Solar PV Sites

Grade	Description	Area (ha)	Area (%)
Grade 1	Excellent quality	0.0	0
Grade 2	Very good quality	30.8	4
Subgrade 3a	Good quality	202.5	27
Subgrade 3b	Moderate quality	245.6	33

Grade	Description	Area (ha)	Area (%)
Grade 4	Poor quality	204.2	28
Grade 5	Very poor quality	0.0	0
Non-agricultural		10.8	1

3.4.2 The mitigation area in the west of Lime Down C extends to 55.5 ha (7%). This land was not surveyed as part of the ALC surveys as it is not anticipated to be subject to disturbance. However, having regard to the survey findings for immediately adjoining parcels, and the professional judgement of the soil surveyors, this area is considered highly likely to comprise predominantly of Subgrade 3b and Grade 4 land.

3.4.3 The agricultural land within the Cable Route Corridor is mostly arable in the north and mostly grassland in the south. Soil surveys have been completed within the Cable Route Corridor where permission was able to be obtained for access. Where ground data has not yet been possible to obtain, the land grading has been predicted based on interpolation of actual survey data in light of mapped soil types and climatic parameters. The ALC grading for the Cable Route Corridor is set out in below.

Table 3-2: ALC Areas for the Cable Route Corridor

Grade	Description	Area (ha)	Area (%)
Grade 1	Excellent quality	0.0	0
Grade 2	Very good quality	10.8	3
Subgrade 3a	Good quality	178	49
Subgrade 3b	Moderate quality	62.8	17
Grade 4	Poor quality	34.4	9
Grade 5	Very poor quality	0.0	0
Non-agricultural		79.8	22

3.4.4 The ALC land types for the Order Limits are mapped on **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172].**

Public Rights of Way

3.4.5 PRoW and highways within and surrounding the Order limits are shown on **ES Volume 2, Figure 2-4: PRoW and Highways [REP3-034]**.

3.4.6 There are 19 Footpaths, 7 Bridleways and 3 Byways Open to All Traffic (BOAT) distributed reasonably evenly within the Solar PV Sites, with the densest concentration being in and around Lime Down D and E.

3.4.7 There are 19 Footpaths, 2 Bridleways, and 1 BOAT running through the Cable Route Corridor.

Minerals

3.4.8 There are no mining areas or mineral safeguarding areas (MSA) recorded within the Solar PV Sites but the Cable Route Corridor does pass through:

- two small areas of the Bristol Avon Valley Mineral Resource Zone and MSA which cover approximately 3.7 ha in total; and
- a MSA identified for building stone between Corsham and Whitley which extends to 27.2 ha.

3.4.9 The likely effects of the Scheme on minerals have been assessed in the ES and is summarised in the planning appraisal section of this Planning Statement.

3.5 Cumulative Assessment

3.5.1 For the purposes of EIA, a search of cumulative developments has been carried out and a 'long list' of developments has been compiled which lists all relevant developments within a particular maximum Zone of Influence (ZoI) from the Scheme. The ZoI is defined by each technical topic in their responsive assessment methodologies, and the full list of ZoI per topic is set out in **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-073].**

3.5.2 Developments appearing in the long list have then been screened to determine their potential to interact with the Scheme in a manner that might generate cumulative effects and a 'short list' of developments has been created which lists the developments screened for further assessment. The short list has been prepared in consultation with Wiltshire Council and appears in **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-073]** and, for ease, has been replicated in **Annex D: Planning History** of this Planning Statement. The location of those developments is shown in **ES Volume 2, Figure 21-1: Location of Short List Cumulative Developments [APP-178]**.

3.6 Relevant Planning History and Allocations

3.6.1 A summary of the most relevant planning permissions surrounding the Order Limits is provided below.

Solar

3.6.2 Other solar farm developments have been approved or proposed within close proximity to the Scheme. The Eden RB Solar Farm (Ref: PL/2023/08481), located around the A350 to the east of Kington Saint

Michael and approximately 3.3 km east from the Cable Route Corridor, was approved in January 2025 and comprises a 40 MW solar array with associated battery storage and grid connection infrastructure. A second solar scheme (Land East of Battens Farm, Allington, SN14 6LT Ref: PL/2024/09410) is proposed to be located to the east of Yatton Keynell and is immediately to the east of the Cable Route Corridor. The application was submitted in late 2024 and is currently pending determination. Additionally, planning permission was granted in December 2021 for a solar farm and battery storage facility at land north of Melksham Substation (Ref: 20/06840/FUL), the nearest panels for which are approximately 90 m from the Order Limits (specifically, from the Existing National Grid Melksham Substation).

3.6.3 Other solar schemes further away from the Order Limits but within the Zone of Influence (which differs for various environmental topics) are set out in **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-073]**.

Battery Energy Storage Systems, Substations and Cable Routing

3.6.4 Several planning applications for BESS and associated infrastructure have recently been brought forward in close proximity to the Scheme. These include two consented schemes within 0.3 km of the Cable Route Corridor: a 10 MW BESS (Ref: 19/10628/FUL) approved in December 2019 and a 20 MW BESS (Ref: PL/2021/07610) approved in January 2022. More recently, a screening opinion was issued for a proposed 50 MW BESS (Ref: PL/2024/10434) located just 0.2 km from the Order Limits, confirming that an EIA was not required. Another screening opinion (Ref: PL/2024/10089) for a 99.9 MW BESS scheme 1.3 km from the Cable Route Corridor also concluded that EIA was not necessary.

3.6.5 In terms of grid connection infrastructure, two cable routing applications have been submitted within the Order Limits. An underground cable installation (Ref: PL/2022/09253) was approved in April 2023, while a further application (Ref: PL/2024/01560) remains under consideration as of July 2025. These directly relate to energy infrastructure delivery within the Cable Route Corridor. In addition, the Eden RB Solar Farm (Ref: PL/2023/08481), referenced above, also includes associated BESS.

Other

3.6.6 A number of residential schemes have recently come forward in proximity to the Order Limits. This includes a full application (Ref: 19/01490/FUL) relating to land east of Farells Field, Yatton Keynell, for 31 dwellings, public open space, landscaping and associated infrastructure, located approximately 0.5 km from the Cable Route Corridor, which was approved

in August 2021. An approved scheme (Ref: PL/2022/06908) relating to land at Hunters Moon, Chippenham for 56 dwellings with parking, open space, and drainage infrastructure is located approximately 0.6 km away in Chippenham. Further applications for residential development include 24 dwellings at land south of Dicketts Road, Corsham (Ref: PL/2023/10560), currently pending consideration, and 45 dwellings at land off Sopworth Lane, Sherston (Ref: PL/2024/00865), also under determination. A larger scheme for 41 dwellings including 40% affordable housing and highways improvements at land east of Patterdown Road, Rowden (Ref: PL/2024/02998) has been submitted nearby and is currently under review.

3.6.7 Also of note is an outline application (Ref: 20/10972/OUT), permitted in February 2023, for up to 71 dwellings and a community car park, which also reserves land for school expansion, on a site that lies directly adjacent to Lime Down D.

3.6.8 A number of mixed-use allocations and permissions lie near the Order Limits. The Rowden Park allocation (Policy CH1: South West Chippenham of the Chippenham Site Allocations Plan (Ref-25) includes 1,000 dwellings, 18 ha of employment land, a primary school, local centre, and 100 ha of country park. This is located approximately 0.9 km from the Cable Route Corridor. A permitted mixed-use scheme (Ref: 18/08271/OUT) allows for up to 44,150 sqm. of floorspace including R&D, offices, logistics, and test areas, alongside access improvements. This site is at Hullavington Airfield, close to Lime Down D and E.

3.6.9 There are also employment allocations under Policy CP35: Existing Employment Sites of the Wiltshire Core Strategy (Ref-23), including Bumpers Farm and Methuen Park, which designate up to 26.5 ha of employment land (across three Chippenham sites) for B1, B2, and B8 uses. Methuen Park, in particular, lies directly adjacent to the Cable Route Corridor.

3.6.10 A final application of note is the A350 Chippenham Bypass Phase 4 and 5 scheme (PL/2023/04993), being brought forward by Wiltshire Council, which underwent an EIA Screening Opinion in 2023. This road is 1.1 km to the Order Limits (Cable Route Corridor).

4 The Scheme

4.1 Introduction

4.1.1 This section describes the Scheme, its main components and the activities that would take place during the construction, operation and maintenance and decommissioning phases of the Scheme.

4.1.2 A full description of the proposed Scheme is provided in **ES Volume 1, Chapter 3: The Scheme [APP-055].**

4.2 Definition of the Scheme in the DCO

4.2.1 Article 3 of the **Draft DCO [REP6-005]** provides that, subject to the provisions of the DCO including the Requirements in Schedule 2, development consent is granted for the *"authorised development".*

4.2.2 For this purpose, *"authorised development"* is defined in Article 2 of the **Draft DCO [REP6-005]** and means *"the development described in Schedule 1 (authorised development) and any other development within the meaning of section 32 (meaning of "development") of the 2008 Act authorised by this Order".*

4.2.3 If consented, the DCO would permit the authorised development defined in Schedule 1 of the **Draft DCO [REP6-005]** within the limits shown on the **Works Plan [REP6-004]**. Schedule 1 of the **Draft DCO [REP6-005]** defines the NSIP (Work **No.1**) and the associated development (Work numbers **2 to 10**). This includes all works associated with the construction, operation and maintenance, and decommissioning of the Solar PV Panels; BESS; on-site substations (132 kV and 400 kV); National Grid connection works; electrical cabling (up to 400 kV); internal access tracks, ramps, bridges and permissive paths; temporary and permanent access and laydown areas; security measures; boundary treatments; acoustic barriers; earthworks; drainage; utility infrastructure; landscaping and biodiversity enhancements; habitat creation and management; works to watercourses and irrigation systems; signage; and other associated and ancillary works required to enable the construction, operation and maintenance and decommissioning of the authorised development.

4.2.4 The following schedules of the **Draft DCO [REP6-005]** and related plans define, and secure, works related to streets:

- Schedules 4, 5, 6 and 7 of the **Draft DCO [REP6-005]** and the **Streets Plan [REP5-007], and Public Rights of Way Plan [REP5-008]** illustrates any new or altered means of access and any diversions of PRoW; and

- Schedule 8 of the **Draft DCO [REP6-005]** and the **Streets Plan [REP5-008]** show details of traffic regulation measures that may be required for the construction of the Scheme.

4.2.5 The plans set out above are certified documents as set out in Schedule 13 of the **Draft DCO [REP6-005]**.

4.3 Components of the Scheme

4.3.1 This section provides a summary of the Work numbers as specified in Schedule 1 of the **Draft DCO [REP6-005]**. A full description of the Scheme is provided in **ES Volume 1, Chapter 3: The Scheme [APP-055].** An indicative layout for the Scheme appears at **ES Volume 2, Figure 3-1: Indicative Site Layout Plan [REP3-035]** and the areas for each of the Works is set out on the **Works Plans [REP6-004].**

4.3.2 The main components of the Scheme would include:

- **Solar PV Infrastructure (Work No.1)**, comprising:
  - Ground mounted bifacial solar photovoltaic (PV) panels (Solar PV Panels) which would convert sunlight into electrical current;
  - Solar PV mounting structures upon which the Solar PV Panels would be mounted (Solar PV Mounting Tables). The Applicant seeks consent for both tracker and fixed Solar PV Mounting Table options;
  - 33 kV Sub-distribution Switch Rooms, which would be located throughout the Solar PV Sites to collect the generated power and manage its delivery to the 132 kV and 400 kV Substations;
  - Conversion Units, which incorporate inverters, transformers and switchgear. These are required to convert the direct current (DC) electricity collected by the Solar PV Panels into alternating current (AC), which allows it to be exported to the grid. The equipment would either be standalone, or housed together within a container; and
  - Electrical and communications cabling required to connect the Solar PV Panels to other components of the Scheme.
- **Battery Storage System (BESS) Area (Work No.2)**. The BESS will be designed to provide peak generation and grid balancing services to the electricity grid. The BESS Area will include: battery energy storage system units each containing fire protection systems and components; containers for housing the cells; interconnection

units including heating, ventilation and air conditioning, liquid cooling systems; conversion units including inverters, transformers and switchgear; monitoring and control systems; cabling between the BESS containers and other infrastructure within the BESS Area; together with other associated infrastructure including surface water management infrastructure and fire safety infrastructure such as provision for fire water supply and containment;

- **Substations (Work No.3)** to include:
  - 132kV Substations: located in Lime Down A, C, D and E, which would take power from the 33kV Sub-distribution Switch Rooms and feed power to the 400kV Substation. The 132kV Substations would include external electrical infrastructure and a separate control building with welfare facilities;
  - 400kV Substation: One 400kV Substation would be located in Field D22 of Lime Down D (refer to **ES Volume 2, Figure 3-1: Indicative Site Layout Plan [REP3-035]**) and would be used to step up the electrical voltage to 400kV ready to be exported to the Existing National Grid Melksham Substation. It would also step down the voltage from 400kV to allow for both excess electricity from the grid and Solar PV Sites to be stored within the BESS. The 400kV substation would consist of external electrical infrastructure such as transformers, switchgear and metering equipment, together with a separate control building and may incorporate a metering room; and
  - Associated works such as cabling and earthworks.
- **Grid Connection Works at the Existing National Grid Substation (Work No.4)**. This is required to connect the Scheme to the infrastructure at the Existing National Grid Melksham Substation and is anticipated to include the installation of a circuit breaker, current transformers, a disconnector/earth switch, sealing ends and cables and busbar modifications. An additional building may be required to house protection, control and ancillary apparatus. At this stage the location of the bay to be used by the Scheme within the Existing National Grid Melksham Substation is not known;
- **Cabling and associated works in the Cable Route Corridor (Work No. 5, 5A and 5B).** The Cable Route Corridor consists of the area required for the Interconnecting Cables (which connect the Solar PV Sites) and the Grid Connection Cables (which connect the Solar PV Sites to the Existing National Grid Melksham Substation).

The Cable Route Corridor is typically 50 m wide but widens to up to 665 m wide in a number of locations such as utility or road and rail crossings to allow additional working space for horizontal directional drilling (HDD). Cabling between Solar PV panels will also be required, together with other associated cabling such as data cables to allow for data monitoring during operation, CCTV cabling, and cabling to connect substations to the local electricity distribution network (to provide power to the substation equipment for use in the event of technical problems). Work Nos 5A and 5B also include temporary construction and decommissioning laydown areas associated with laying the cables;

- **Supporting infrastructure (Work No. 6)** including fencing, gates and boundary treatments; security and monitoring measures (e.g. CCTV, lighting, communication equipment); landscaping and biodiversity works; improvements to private tracks; internal access tracks, ramps, bridges and footpaths; temporary footpath diversions and signage; earthworks; sustainable drainage and irrigation infrastructure; acoustic barriers; utility connections; and secondary temporary construction and decommissioning laydown areas;
- **Temporary construction and decommissioning laydown areas (Work No. 7)**, including hardstanding, car parking, offices, security and welfare facilities, storage facilities, site drainage and utility connections;
- **Site Accesses (Work No. 8, 8A and 8B)** comprising the creation of temporary and permanent access from the public highway to enable construction, operation and decommissioning, including visibility splays, temporary and permanent highway alterations, and offsite works (e.g. to structures, boundaries and drainage) to accommodate abnormal load movements;
- **Landscaping, Ecological Mitigation and Enhancement (Work No.9)** such as landscape and biodiversity enhancement measures and habitat creation including associated works;
- **Permissive Paths (Work No.10, 10A and 10B).** These will contribute to the wider network of footpaths in the area and facilitate greater public access to the countryside. The design and implementation of the permissive paths is set out in the **Outline PRoW and Permissive Paths Management Plan [REP1-104]** and **Outline LEMP [REP6-037]** and secured by Requirement 16 in the **Draft DCO [REP6-005]**; and
- **Further associated development in connection with the above works.** This is set out further in the **Draft DCO [REP6-005]**.

4.3.3 Further details regarding the Scheme and the design process undertaken are discussed in the **Design Approach Document [APP-268]**. The Design Approach Document (DAD) sets out how good design has been embedded into the Scheme from the outset of the project, and how it will continue to be achieved through to detailed design, to ensure that the Scheme achieves well-designed project outcomes and mitigates adverse effects.

Associated Development

4.3.4 Section 115(2) of the PA 2008 states that a DCO can include consent for development which *"is associated with the development"* for which development consent is required.

4.3.5 The Department for Communities and Local Government issued guidance on associated development (Ref-4) which states that:

"It is expected that associated development will, in most cases, be typical of development brought forward alongside the relevant type of principal development."

4.3.6 This can include necessary infrastructure (e.g. grid connections, which solar could not function without), impact mitigation measures, innovative ideas aligned with policy guidance, and proportionate supporting facilities (like retail or business space for transport schemes).

4.3.7 Accordingly, Work Numbers 2 to 10 listed above constitute associated development as they are typical development brought forward alongside and are necessary to deliver the NSIP (Work No. 1).

4.4 Flexibility

4.4.1 Paragraph 4.3.11 of NPS EN-1 (Ref-5) recognises that:

"In some instances, it may not be possible at the time of the application for development consent for all aspects of the proposal to have been settled in precise detail."

4.4.2 Paragraph 4.3.12 of NPS EN-1 continues that:

"Where some details are still to be finalised, the ES should, to the best of the applicant's knowledge, assess the likely worst-case environmental, social and economic effects of the proposed development to ensure that the impacts of the project as it may be constructed have been properly assessed."

4.4.3 Section 2.6 of NPS EN-3 (Ref-6) sets out national policy with respect to flexibility in details of schemes. Paragraph 2.6.1 states:

"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."

4.4.4 NPS EN-3 paragraph 2.10.70 also states that it is likely that flexibility will be needed in relation to schemes for solar development with respect to aspects which 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."*

4.4.5 The extent of flexibility required by the Scheme is described in **ES Volume 1, Chapter 3: The Scheme [APP-055]**. To maintain flexibility in the design and layout at this stage in the process and ensure maximum effects are assessed in the EIA and considered by the Secretary of State, the Scheme has adopted the Rochdale Envelope approach in accordance with the Planning Inspectorate's Advice Note 9 (Ref-7). This involves specifying parameter ranges, including details of the maximum and where relevant minimum size (footprint, width, height), technology, and locations of the different elements of the Scheme where flexibility needs to be retained. The use of the Rochdale Envelope has therefore been adopted to ensure that the likely worst-case scenario is presented in the assessment of potential environmental effects from the Scheme.

4.5 Construction Phase Activities

Overview

4.5.1 A detailed description of the construction activities that are likely to be required is set out in **ES Volume 1, Chapter 3: The Scheme [APP-055].**

4.5.2 Subject to being granted development consent and following a final investment decision, the earliest construction could start is in 2027. Construction of the Solar PV Sites and Cable Route Corridor is likely to start in tandem. The installation of cable within the Cable Route Corridor would require up to approximately 18 months and the construction of the Solar PV Sites would require an estimated 24 months. The operation and maintenance phase is anticipated to commence in 2029. Potential construction durations across the different parts of the Scheme are set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]**, and show a series of overlapping stages.

4.5.3 A CEMP will be implemented to manage the environmental impacts of construction activities. This is secured by Requirement 13 in Schedule 2 of the **Draft DCO [REP6-005]**. The Applicant has produced an **Outline CEMP [REP6-029]** which is submitted with the DCO Application and with which the final CEMP will need to substantially accord.

4.5.4 An **Outline CTMP [REP6-041]** has also been submitted with the DCO Application detailing the measures to manage construction traffic during the construction phase, in order to minimise disruption and implications on the wider road network surrounding the Scheme. Production of a final CTMP is secured by Requirement 15 in Schedule 2 of the **Draft DCO [REP6-005]** and will need to substantially accord with the Outline CTMP.

Construction Staff

4.5.5 It is currently estimated that the Scheme would generate a peak of 692 on-site construction workers and 268 Full Time Equivalent (FTE) jobs during the construction phase. The size of the workforce is based on the activities required and would fluctuate during the construction phase. During operation, 15 permanent jobs would be generated. In a peak replacement scenario, 125 FTE are required and in the decommissioning phase up to a gross of 214 FTE employees per annum are estimated.

Construction Hours of Work

4.5.6 The core construction hours (not including start-up and shut-down works) are Monday-Friday 7:00 to 18:00 and Saturday 8:00 to 13:30. There will be no Sunday or Bank Holiday working unless it is crucial to construction (for example for horizontal directional drilling (HDD) which must be a continuous activity) or in an emergency.

4.5.7 Start-up and shut-down activities on site will involve low-noise tasks, including security checks, unlocking and locking gates, and conducting toolbox talks.

4.5.8 Some activities may be required outside of these times such as delivery of abnormal loads, concrete pours for foundations, night working for cable construction works in public highways and/or HDD activities.

Construction Traffic, Plant and Site Access

4.5.9 At this stage, based on the preliminary construction material and equipment requirements, the following vehicle movements are anticipated during the construction phase, spread out around the different areas of the Solar PV Sites and the different access routes to the Solar PV Sites:

- Average HGV deliveries per day: 57 (114 movements); and
- Peak HGV deliveries per day: 85 (171 movements).

- Construction worker arrivals (car and shuttle bus): 398 arrivals (796 movements)

4.5.10 It is anticipated that during construction, the Cable Route Corridor will generate the following trips on an average day:

- Average HGV deliveries per day: 16 (32 movements)
- Average LGV deliveries per day: 16 (32 movements)
- Construction worker arrivals: 40 (80 movements)

4.5.11 Where practicable, construction deliveries would be coordinated to avoid HGV movements during traditional peak morning (8:00 - 9:00) and afternoon (17:00 – 18:00) hours.

4.5.12 Construction traffic and Site access is discussed further in **ES Volume 1, Chapter 13: Transport and Access [REP4-014]** and measures to manage construction traffic are set out in the **Outline CTMP [REP6-041]**.

Construction Compounds and Lighting

4.5.13 Temporary construction compounds would be established within the Solar PV Sites and comprise temporary portacabins, perimeter security fencing (typical maximum height 3 m), parking areas, secure storage compound, temporary hardstanding, wheel washing facilities, temporary gates compound, storage bins for recycling and other waste and lighting.

4.5.14 In addition, temporary laydown areas would be progressively established across the Solar PV Sites to service local works. These will typically be set up ahead of installation and decommissioned as the relevant works in their locality progress and become completed.

4.5.15 Temporary compounds would also be located along the Cable Route Corridor, to include parking bays, portacabins, welfare facilities, unloading and storage areas and power generators. These will be secured using temporary heras-type fencing and security cameras. The compounds will be removed and the land reinstated upon completed of construction.

4.5.16 Temporary site lighting would be used during construction to enable safe working during construction in hours of darkness or where natural lighting is unable to reach (such as sheltered/confined areas). Mobile lighting towers with a power output of 8 kilo volt-amperes (kVA) would be used for construction work, along with lighting at the construction compounds whilst construction is underway. Measures to control lighting are set out in the **Outline CEMP [REP6-029]**, including measures to minimise lighting to that required for safe site operations, use of directional fittings to avoid

light spill, and directing lighting into the Order Limits rather than towards the boundaries.

4.6 Biodiversity and Landscaping

4.6.1 Embedded mitigation measures for the construction phase are set out in the **Outline CEMP [REP6-029]**, including measures such as construction and exclusion zones in relation to retained vegetation, ensuring a tidy and neat working area, covering stockpiles and storing topsoil in accordance with good practice measures. Following construction, a programme of site reinstatement will commence.

4.6.2 In accordance with the project Design Principles outlined in the **Design Approach Document [APP-268],** the Scheme adopted a 'landscape led' approach to design, giving due weight to the intrinsic character and surrounding beauty of the surrounding countryside. In line with this principle, the Scheme has been designed to integrate with, and where practicable enhance, the landscape and local green infrastructure network, to improve biodiversity and ecological connectivity across the Solar PV Sites. The proposed landscaping design is set out in **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [REP6-037].** This has been developed with regard to feedback from the Cotswolds National Landscape Board and Wiltshire Council, including measures to protect and enhance the setting of the CNL (specific consultation feedback and responses is set out in **ES Volume 1, Chapter 8: Landscape and Visual [REP3-025]** and the **Consultation Report [APP-022]**).

4.6.3 As set out in the **BNG Assessment Report [EN010168/EXAM/7.8 as updated for Deadline 7]** and shown on the indicative layout for the Solar PV Sites at **ES Volume 2, Figure 3-1: Indicative Site Layout Plan [REP3-035]**, the proposed new planting will include:

- 11.04 ha of new native broadleaved woodland;
- 9.43 km of new lines of trees;
- 15.90 km of new native hedgerows;
- 619 ha of new improved grassland; and
- 4.43 ha of mixed scrub planting.

4.6.4 The design also incorporates species mitigation and enhancement features in the form of:

- Ground Nesting Bird Habitat: This comprises 54 ha of hay-cut grassland habitat on field numbers A1, B12, C1 and C6 and 63.2 ha of set aside on field numbers A11, A12, C10, and C24 to provide

structural and species diversity and improve the suitability of this habitat for foraging and nesting birds; and

- Habitat boxes and wildlife enhancement features: this will comprise bird and bat boxes, log piles and other areas providing hibernation opportunities, and bee banks. Initial details are provided in the **Outline LEMP [REP6-037]** and is anticipated that the finalised location and specification plan will be produced as part of the final LEMP.

4.6.5 The above measures are outlined in **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [REP5-039]** and the **Outline LEMP [REP6-037]**, to be secured through Requirement 7 in Schedule 2 to the **Draft DCO [REP6-005]**.

4.6.6 The Applicant is committed to delivering BNG. The Scheme will deliver, as a minimum, 10% BNG, which is secured via Requirement 9 in Schedule 2 to the **Draft DCO [REP6-005].** The **BNG Assessment Report [EN010168/EXAM/7.8 as updated for Deadline 7]** indicates that BNG in excess of 10% will be achieved, with a total net gain of 65.35% for area habitat units, 19.39% for hedgerow units and 25.30% for watercourse units in relation to the Solar PV Sites. The total net gain for the whole Scheme (i.e. Solar PV Sites and Cable Route Corridor combined) is 37.64% for area habitat units, 12.77% for hedgerow units and 19.89% for watercourse units.

4.7 Operational and Maintenance Activities

Overview

4.7.1 The operational life of the Scheme is anticipated to be 60 years. Activities during that time can be categorised as: general operational and maintenance activities, and programme of replacement activities.

4.7.2 The **Outline OEMP [REP6-031]** sets out the general environmental principles to be followed during the operation of the Scheme. The **Outline OEMP [REP6-031]** will be used as the basis for a detailed OEMP to be prepared prior to commencement of operation, which is secured via Requirement 14 in Schedule 2 to the **Draft DCO [REP6-005].**

General Operational Maintenance

4.7.3 During operation, day to day activity on the Solar PV Sites would be principally vegetation management, equipment maintenance and servicing, ad hoc replacement and renewal of failed components and general monitoring. Along the Cable Route Corridor, operational activity will consist of routine inspections and ad hoc maintenance of cables where required.

4.7.4 No permanent on-site staff will be required to operate the Scheme and relay and monitoring equipment is likely to be accessed remotely (with occasional physical access during routine visits). A further 15 FTE staff jobs would be created per annum during the operational phase, which would not be based on site.

4.7.5 Regular maintenance visits are likely to be limited to no more than five visits per month to any of the Solar PV Sites. Limited use of HGVs may be required for ad hoc replacement of components.

4.7.6 Existing field accesses are proposed for the operational access where this is practicable and would reuse construction accesses. This excludes the access taken from the Fosse Way to Lime Down B which would only be used during operational programme of replacement activities. The proposed operational accesses are shown on **ES Volume 2, Figure 3-1: Indicative Site Layout Plan [REP3-035]**.

4.7.7 Lighting is largely not required within the Solar PV Sites during the operation of the Scheme. Motion sensing security lighting would be provided within substations and within the BESS Area to be used to maintain safe working conditions in winter months and for security purposes.

4.7.8 The volume of stored fire water will be maintained to ensure there is sufficient water for firefighting purposes. Details of fire water supply and storage are provided within the **Outline Battery Safety Management Plan [REP3-106]** which supports the DCO Application.

Replacement

4.7.9 During the anticipated 60-year operational life of the Scheme, it is expected that periodic replacement of some or all of the electrical infrastructure will be required. A programme of replacement is anticipated to be staged to maintain the electrical export to the National Grid. Details of the assumptions made regarding replacement for the purpose of EIA are set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]**.

4.8 Decommissioning Activities and Reinstatement

4.8.1 Decommissioning is expected to take between 12 and 24 months, will be carried out in phases, and is expected to occur in 2089, after the 60-year design life of the Scheme. It. An **Outline Decommissioning Strategy [REP6-033]** has been prepared as part of the EIA and submitted with the DCO Application. Decommissioning would be prepared substantially in accordance with the **Outline Decommissioning Strategy [REP6-033]**, secured by Requirement 20 in Schedule 2 to the **Draft DCO [REP6-005]**, and agreed with relevant authorities at the time of decommissioning.

4.8.2 The Solar PV Sites would be decommissioned and the land returned to its original use and condition as far as practicable and returned to the landowner. All Solar PV Panels, mounting piles, cabling, inverters, transformers, switchgear, BESS and substations would be removed from within the Solar PV Sites and recycled or disposed of in accordance with good practice and market conditions at that time. This will include the areas of agricultural land where the soil health, quality and structure may have improved, and the established habitats. Foundations and other below ground infrastructure will be cut to 1.2 m below the surface to enable future ploughing. Any piles would be removed.

4.8.3 Post-decommissioning, the landowners would choose how the land is to be used and managed, the landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. Permissive paths would be removed during decommissioning, with the precise timing to be determined by the contractor(s) and communicated to Wiltshire Council in accordance with the **Outline Decommissioning Strategy [REP6-033]**.

4.8.4 In the Cable Route Corridor, the current most environmentally acceptable option is considered to be leaving the cables in situ, as this avoids disturbance to overlying land and habitats and to neighbouring communities. Alternatively, the cables can be removed by opening up the ground at regular intervals and pulling the cable through to the extraction point, leaving the ducting and jointing bays in place, avoiding the need to open up the entire length of the cable route.

4.8.5 Some soil profiling may be required, and the land will be contoured in agreement with the landowner and in accordance with the **Outline Decommissioning Strategy [REP6-033]**.

4.8.6 All work done to the Existing National Grid Melksham Substation as a result of the Scheme (e.g. the installation of a new feeder bay and connection works) would remain under National Grid's control.

5 The Need for and Benefits of the Scheme

5.1 Introduction

5.1.1 This section of the Planning Statement summarises the need for the Scheme and the benefits it will deliver.

5.2 The Need for the Scheme

5.2.1 The Scheme addresses three key requirements of the UK energy market:

- Decarbonisation: The Climate Change Act 2008 (2050 Target Amendment) Order 2019 established the net zero by 2050 target, which is a target for the UK to reduce its greenhouse gas (GHG) emissions by 100% from 1990 levels by 2050. Carbon budgets set out the Government's framework of actions to meet this commitment. The Climate Change Committee's (CCC) recommendations for the seventh carbon budget (CB7) (2025) suggest a commitment for the UK to reduce greenhouse gas emissions by 87 per cent by 2042 compared to 1990 levels (Ref-8);
- The demand for affordable electricity: the UK's demand for electricity is expected to double by 2050 as the country moves away from reliance on imported fossil fuels and towards renewable sources of energy for transport, industry, agriculture and powering homes. Due to the increased demand, sources of cheap electricity are now more important than ever; and
- The security of supply: "Security of supply" generally means ensuring there is enough electricity generation capacity available and operational to meet demand.

5.2.2 National planning policies and government policy papers support the achievement of the above requirements and must be viewed in the context of the ever-increasing demand for electricity.

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

5.2.4 Paragraph 3.2.6 of NPS EN-1 states that:

"The Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is a need for those types of infrastructure which is urgent, as described for each of them in this Part."

5.2.5 Paragraph 3.2.7 goes on to state that:

"The Secretary of State has determined that substantial weight should be given to this need when considering applications for development consent under the Planning Act 2008."

5.2.6 Paragraph 3.2.8 of NPS EN-1 notes that:

"The Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established by this NPS."

5.2.7 These key paragraphs in NPS EN-1 demonstrate the urgent need for nationally significant renewable energy projects such as the Scheme.

5.2.8 Further, low carbon infrastructure such as solar power has been identified as critical national priority (CNP) infrastructure (NPS EN-1 paragraph 4.2.5). This means that if residual impacts remain after application of the mitigation hierarchy, the urgent need for solar and other forms of CNP infrastructure is likely to outweigh those residual impacts of development in all but the most exceptional circumstances (NPS EN-1 paragraph 4.1.7).

5.2.9 The government's Clean Power 2030 Action Plan (December 2024) (Ref-9), is the most up to date policy paper and reinforces the urgent need for low carbon generation schemes to come forward to pave the way to decarbonising the wider economy by 2050. The Clean Power 2030 Action Plan provides a foundation to prioritise the most critical infrastructure to meet Clean Power by 2030. 'Clean Power by 2030' means that, in a typical weather year, the 2030 power system will see clean sources produce:

- At least as much power as Great Britain consumes in total over the whole year; and
- At least 95% of Great Britain's generation.

5.2.10 Mass deployment of solar generation is identified in the Clean Power 2030 Action Plan as critical to achieving this aim, with 45-47 GW of solar power generation required to be installed by 2030 to meet the target (up from a current installed capacity of 16.6 GW as at quarter 2 of 2024).

5.2.11 The climate crisis has also been recognised at a local level. In February 2019 (Ref-10) Wiltshire Council resolved to acknowledge the climate emergency and to seek to make the county of Wiltshire carbon neutral by 2030. Similarly, in July 2019 South Gloucestershire Council declared a climate emergency (Ref-11) and also pledged to enable South Gloucestershire to become carbon neutral by 2030, through measures outlined in its Climate Emergency Strategy (Ref-12).

5.2.12 The **Statement of Need [REP1-085]** provides a detailed explanation of why the Scheme is urgently needed, and how the Scheme addresses the relevant aspects of established and emerging government energy and climate change policy and commitments.

5.2.13 The following sections outline how the Scheme meets the key requirements of the UK energy market, in line with government policy.

Need for Decarbonisation

5.2.14 The global climate is rapidly changing as a result of human-induced warming, which in turn increases the risks of extreme weather events. There is therefore a compelling need for global action to decarbonise in order to limit global temperature increases. The Paris Agreement (Ref-13), a legally binding international treaty on climate change entered into on 4 November 2019, aims to hold the increase in the global average temperature to well below 2°C above pre-industrial levels and pursue efforts to limit the temperate increase to 1.5°C above pre-industrial levels.

5.2.15 As a result of its commitments to the Paris Agreement, in June 2019, the UK became the first major economy to legislate for a 2050 net zero greenhouse gas (GHG) emissions target through the Climate Change Act 2008 (2050 Target Amendment) Order 2019 (Ref-14). As a result, decarbonisation is a UK legal requirement. As set out in the **Statement of Need [REP1-085],**the CCC made clear in its Progress Report to Parliament in 2019 that the UK is not on track to meet its fourth (2023-2027) or fifth (2028 – 2032) carbon budgets, highlighting the urgent need to rapidly accelerate carbon emission reductions if the 2050 net zero target is to be met. The CCC's recommendations for the seventh carbon budget (CB7) (2025) (Ref-8) suggest a commitment for the UK to reduce greenhouse gas emissions by 87 per cent by 2042 compared to 1990 levels. Further, the CCC recommendations provide that to achieve the government's ambitions in the Clean Power 2030 Action Plan, total operational capacity of renewables will need to more than double by 2030.

5.2.16 As set out in paragraph 4.2.1 of NPS EN-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."

5.2.17 Paragraph 4.2.1 of 2025 NPS EN-1 includes an update to replace the 2035 target with the Clean Power 2030 Mission (which requires clean power by 2030, not 2035), highlighting that the requirement to decarbonise is more urgent than ever.

5.2.18 Without a rapid increase in the supply of low carbon electricity, the urgent requirement to decarbonise other sectors such as transport (as will be required to meet future carbon budgets) is unlikely to be achieved. NPS EN-3 paragraph 2.10.9 confirms that solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector in order to meet the 2050 net zero target. Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation (NPS EN-3 paragraph 2.10.13). They can also be built quickly (NPS EN-3 paragraph 2.10.14), making them ideally placed to meet the UK's decarbonisation targets which requires rapid change, at scale, if they are to be achieved. Therefore, the Scheme is an opportunity to significantly contribute towards the country's targets of clean power by 2030 and net zero by 2050.

Meeting an Increasing Demand for Affordable Electricity

5.2.19 As the country moves towards its Clean Power 2030 Mission and net zero 2050 target, reliance on electricity as a form of power is set to rapidly increase, and new nationally significant electricity infrastructure is needed to meet this increase in demand. NPS EN-1 paragraph 3.3.3 recognises that demand in 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."

5.2.20 As set out above, the Clean Power Action Plan 2030 identifies mass deployment of solar generation as critical to achieving this aim of clean power by 2030, with 45-47 GW of solar power generation required to be installed by 2030 to meet the target.

5.2.21 As set out in the **Statement of Need [REP1-085]**, the capacity of new low carbon schemes which will need to come online prior to 2030 to achieve "clean power by 2030" is unprecedented. In addition, an even greater capacity of new low carbon schemes will need to come on-line in the 2030s to keep power clean through to 2040 as other sectors also decarbonise. The Scheme will significantly contribute to meeting the country's growing electricity demand and therefore will be a critical

enabler in achieving the UK's wider decarbonisation aims of clean power by 2030 and net zero by 2050.

5.2.22 It is acknowledged (as set out above and in the **Statement of Need [REP1-085]**) that solar farms are one of the cheapest forms of electricity generation to deploy and large-scale solar power lowers the price of electricity by generating power so that expensive and more carbon intensive forms of generations do not need to generate as much. Further details are set out in the benefits section below. Therefore, the Scheme would help to provide affordable electricity to meet the ever increasing demand from consumers.

Need to Provide Security of Supply

5.2.23 In addition to meeting decarbonisation targets, government policy requires that security of energy supply is maintained. NPS EN-1 paragraph 3.3.1 provides that the government needs to ensure:

"There is always 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."

5.2.24 Paragraph 3.3.2 provides that, the larger the margin (and, according to 2025 NPS EN-1 paragraph 3.3.2, the more flexible the system), the more resilient the system is to dealing with unexpected events, which helps to protect users, including vulnerable households, from volatile prices and service interruptions which might affect essential services.

5.2.25 NPS EN-1 paragraph 3.3.20 continues that:

"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."

5.2.26 NPS EN-1 also recognises that ensuring system reliability means that wind and solar need to be complemented with technologies which supply electricity, or reduce demand, when the wind is not blowing, or the sun does not shine (NPS EN-1 paragraph 3.3.22). Storage is acknowledged to have a key role to play in achieving new zero and providing flexibility to the energy system, by storing surplus electricity in times of low demand, to be release when demand is higher (NPS EN-1 paragraph 3.3.25).

5.2.27 The Scheme would significantly contribute to an adequate and dependable generation mix through enabling more UK based, low carbon power production. Further, the inclusion of a BESS as associated development in the Scheme allows the Scheme to help store surplus

electricity to be released at times of higher demand, thereby providing flexibility and supporting the transition to a fully low carbon electricity system, and therefore helping to ensure security of supply.

Summary

5.2.28 In summary, decarbonisation is a legally-binding climate change target for the UK and is of global significance. Urgent actions are required in the UK and abroad to keep decarbonisation on track to limit global warming. NPS EN-1 and EN-3 establish a critical national priority for the provision of nationally significant low carbon infrastructure, which includes large-scale solar farms, because a combination of many or all types of such infrastructure is urgently required for both energy security and to meet the 2050 net zero target.

5.2.29 The UK Government's Clean Power 2030 Action Plan reinforces the urgent need for low carbon generation schemes to come forward to pave the way to decarbonising the wider economy by 2050 as the UK pursues the electrification of heat in buildings, transport, and industry.

5.2.30 The Scheme will help the UK to meet its legally binding carbon emissions reduction targets, while enhancing national security of supply, and providing low-cost electricity to meet the increasing demand.

5.3 The Benefits of the Scheme

Overview

5.3.1 This section summarises the benefits of the Scheme.

Decarbonisation

5.3.2 As set out above, the Scheme addresses three key requirements of the UK energy market; decarbonisation, the demand for electricity and security of supply.

5.3.3 **ES Volume 1, Chapter 7: Climate Change [REP5-022]** sets out the likely greenhouse gas (GHG) emissions arising from the Scheme construction, operation and decommissioning and the potential impacts of the Scheme on climate change. It concludes that, over its lifespan, the Scheme will result in an estimated net saving of 65,916 tCO_2e if tracker panels are used or 266,507 tCO2e for fixed panels in comparison with a scenario whereby the Scheme does not come into effect and emissions from the grid in the baseline year of operation were used (with greater net savings when Well-To-Tank emissions are excluded). It is likely that a combination of tracker and fixed panels would be utilised and under such circumstances, the total emissions, and savings, would be within the ranges presented in the assessment in Chapter 7. The overall GHG

impact of the Scheme is beneficial and significant**.** As set out further in section 8.3 below, the Applicant has also considered how its calculations may change if the Scheme is operational for 40 years, and concludes that there will still be a net saving.

5.3.4 Therefore, if consented, the Scheme would make a significant and timely contribution to meeting the government's targets of Clean Power by 2030 and net zero by 2050 and therefore represents a benefit to the UK and its decarbonisation targets.

Nationally Significant Electricity Generation

5.3.5 The Scheme has a grid connection agreement with the National Energy System Operator (NESO) for connection at the Existing National Grid Melksham Substation. The actual amount of electricity generated by the Scheme will depend on the final design, layout and technology adopted. However, for the purposes of assessment, as set out in **ES Volume 1, Chapter 7: Climate Change [REP5-022],** renewable energy generation from the Scheme during the first year of operation is estimated to be around 442,300 MWh/year if tracker panels are used and around 560,000 MWh/year if fixed panels are implemented. To account for product degradation, a 1% degradation factor for the first year has been applied, followed by a 0.35% degradation factor for each subsequent year. This results in an estimated energy generation figure of 395,543 MWh in the final year of operation for tracker panels and 500,801 MWh for fixed panels. The total energy generated by the Scheme would be around 25.07 TWh and 31.75 TWh over the 60-year Scheme lifespan for tracker and fixed panels respectively.

5.3.6 Given that Ofgem estimates the average medium usage household uses 2,700 (kWh) of electricity per year (Ref-15), the Scheme could provide enough electricity to power around 144,000 homes per year for tracker panels and 148,000 homes per year for fixed panels. This represents a significant contribution towards delivery of the government's energy objectives and target of net zero by 2050.

Low Cost Electricity

5.3.7 The **Statement of Need [REP1-085]** provides that large-scale solar power lowers the price of electricity by generating power so that expensive and more carbon intensive forms of generations do not need to generate as much.

5.3.8 Due to technological advances, solar farms are already among the cheapest forms of electricity generation in the UK and government produced forecasts indicate that costs will continue to reduce in the future.

5.3.9 Scale is also important, because maximising the generating capacity of a scheme improves its economic efficiency and so brings electricity generation to the market at a lower cost.

5.3.10 Larger solar schemes deliver more quickly and at a lower unit cost than multiple independent schemes which make up the same total capacity, bringing forward carbon reduction and energy security benefits as well as helping provide affordability, in line with government policy.

5.3.11 The Scheme will be a NSIP which, if consented, will deliver large amounts of cheap, secure, and low carbon electricity which will help the UK to achieve net zero by 2050.

Ecological and Landscape Enhancements

5.3.12 As set out in **ES Volume 2, Figure 3-1 Indicative Site Layout Plan [REP3-035], ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [REP6-037], ES Volume 1, Chapters 8: Landscape and Visual [REP3-025] and 9: Ecology and Biodiversity [REP4-010]**, and the **Outline LEMP [REP6-037]**, the Scheme proposes to deliver substantial new hedgerow and tree planting, reinforcement planting at existing hedgerows and field boundaries, extensive grassland habitat creation and sympathetic management both within buffers and under the Solar PV arrays, as well as discrete, valuable habitat creation away from the Solar PV Panels. This includes connective woodland planting, mixed grassland/wildflower planting; enhanced riparian native planting; reinforced road-side screening; hedgerow reinforcement and enhancements to ponds. Further, the reversion of the arable fields which dominate the Solar PV Sites to grassland (for the lifetime of the Scheme) is considered likely to result in a significant beneficial effect by improving the extent and quality of grassland habitats within the Solar PV Sites which may provide supporting habitat for species. Beneficial effects to the soil may also be derived from the cessation of cultivation, chemical treatments and soil inputs.

5.3.13 Whilst some significant adverse effects on landscape and biodiversity are anticipated, these are outweighed by the substantial enhancements that are proposed. Further details are provided in the policy appraisal at **Section 8** and the planning balance set out in **Section 9** of this Planning Statement.

Biodiversity Net Gain

5.3.14 The Scheme will deliver, as a minimum, 10% BNG, which is secured via Requirement 9 in Schedule 2 to the **Draft DCO [REP6-005].** The **BNG Assessment Report [EN010168/EXAM/7.8 and as updated for Deadline 7]** indicates that BNG in excess of 10% will be achieved, with a

total net gain of 65.35% for area habitat units, 19.39% for hedgerow units and 25.30% for watercourse units in relation to the Solar PV Sites. The total net gain for the whole Scheme (i.e. Solar PV Sites and Cable Route Corridor combined) is 37.64% for area habitat units, 12.77% for hedgerow units and 19.89% for watercourse units.

Permissive Paths

5.3.15 The Scheme includes the creation of 12.8 km of new non-vehicular permissive paths on each of the Solar PV Sites for the lifetime of the Scheme to provide pedestrians and horse and bicycle riders improved accessibility to the countryside and improved connectivity of the wider PRoW network. The permissive paths will provide a beneficial impact on PRoW use for local users and visitors through mitigating adverse impacts on other PRoWs and providing alternative access routes to the use of the local highway network. These measures, when implemented, will enhance connectivity in the local area for recreation purposes, secondarily benefitting the health and wellbeing of the local population in the long-term.

5.3.16 The location of the proposed permissive paths is outlined on the **Works Plan [REP6-004]** as Work No.10B and indicated on **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [REP6-031].**

5.3.17 The design and implementation of the proposed permissive paths is set out in the **Outline PRoW and Permissive Paths Management Plan [REP1-104]** and their creation and maintenance are secured through Requirement 16 in Schedule 2 to the **Draft DCO [REP6-005]**.

Employment Generation

5.3.18 It is currently estimated that the Scheme would generate a peak of 692 construction workers and 268 Full Time Equivalent (FTE) jobs during the construction phase. Employment opportunities are also anticipated during the operation and decommissioning phases of the Scheme, as set out in **ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068]** and discussed further in **Section 8.3** of this Planning Statement.

Economic benefits

5.3.19 **ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068]** sets out the anticipated economic growth in the construction, operation and decommissioning phases of the Scheme. The net direct employment generated by the Scheme during construction is anticipated to induce an uplift of £15.7 million Gross Value Added (GVA) per annum within 20 km of the Scheme. The Scheme is anticipated to induce a

further uplift of £10.2 million GVA per annum more generally within 20 km of the Scheme, through indirect and induced economic benefits associated with the Scheme's construction. During operation, the net direct employment generated by the Scheme is anticipated to create an uplift of £2.12 million GVA per annum, of which approximately £564,000 GVA per annum is anticipated to be generated within 20 km of the Scheme. A further uplift of £388,000 per annum is anticipated within 20 km of the Scheme as a result of indirect and induced economic benefits resulting from operation of the Scheme. During the peak replacement scenario, the net direct employment from the Scheme is anticipated to generate an uplift of £7.34 million GVA within 20 km of the Scheme, with an additional £2.13 million GVA elsewhere in the UK and indirect and induced economic benefits of £4.77 million per annum within 20km of the Scheme. During decommissioning, the net direct employment generated is anticipated to induce an estimated uplift of £12.6 million GVA per annum within 20 km of the Scheme. As a result of decommissioning the Scheme, an uplift of £8.17 million per annum is anticipated as a result of indirect and induced economic benefits within 20 km of the Scheme. Therefore in total, accounting for the number of years at each phase, the Scheme is anticipated to generate an uplift of in excess of £161 million GVA (chained to 2023 value) within 20 km of the Scheme alone (with further benefits nationally).

Skills training

5.3.20 The Scheme is likely to produce a modest number of skills and education opportunities during its construction, such as through construction apprenticeships. The **Outline SSCEP [EN010168/APP/7.20]** sets out the proposals to promote apprenticeship and training schemes to enhance local skills and qualification rates and help retrain people in work displaced by the Scheme, and decrease the proportion of workers required to be brought in from further afield. This is intended to enhance local education, skills and attainment during construction and for periods of onsite infrastructure replacement during operation of the Scheme. The **Outline SSCEP [EN010168/APP/7.20]** also provides measures to secure opportunities for re-skilling of employees into new industries, including the energy sector, and include supporting the local agricultural industry in diversified agricultural practices.

5.4 Community Liaison Group

5.4.1 A Community Liaison Group (CLG) will be established, to facilitate liaison between representatives of people living in the vicinity of the Order Limits and other relevant organisations in relation to the construction of the Scheme. It will continue to meet until the date of final commissioning of

the Scheme. Its delivery is secured through Requirement 4 in Schedule 2 to the **Draft DCO [REP6-005].**

5.4.2 A Community Liaison Officer will be appointed to lead discussions with local communities, and also act as the primary point of contact should there be any queries or complaints. Details of the Community Liaison Officer are set out in the **Outline CEMP [REP6-029]**.

5.5 Community Benefit Fund

5.5.1 The Applicant has committed to a Community Benefit Fund (CBF). The CBF does not form part of the DCO application and this funding is not required to mitigate the impacts of the Scheme. Therefore it cannot be taken into account in the decision making process for determining the DCO application. However, it will be available to fund local projects.

6 Legislation and Policy Framework

6.1 Introduction

6.1.1 This section summarises the legislative and planning policy context for the Scheme. It outlines the relationship of Scheme with the PA 2008; sets out the relevant policy considerations from the NPSs; and summarises other legislation, policy and documents that the Secretary of State is required to consider and may consider to be important and relevant in their decision making.

6.2 Legislative Context and Policy

The Definition of a NSIP

6.2.1 The PA 2008 defines the application process under which development consent for NSIPs is sought.

6.2.2 The Scheme is defined as a NSIP under Section 14(1)(a) and 15(2) of the PA 2008 (as amended) as it meets the following criteria:

- The Scheme comprises the construction of a generating station (Section 14(1)(a));
- It would be located in England (Section 15(2)(a));
- It would not generate electricity from wind (Section 15(2)(aa));
- It would not be an offshore generating station (Section 15(2)(b)); and
- Its capacity would be more than 100 MW (Section 15(2)(c)).

6.2.3 In accordance with Part 4 of the PA 2008, a DCO is required for the development of a NSIP. This DCO Application primarily seeks consent for the construction, operation and maintenance, and decommissioning of a generating station with a capacity of more than 100 MW, as the principal development. This includes solar PV panels fitted to mounting structures and the field stations which provide the transformers, inverters and switchgear.

Associated Development

6.2.4 Section 115 of the PA 2008 provides that a DCO can include consent for development which is not an NSIP in its own right, but is associated with the principal development for which development consent is required. Examples of associated development might include development that

supports construction, operation or decommissioning or which helps to address the impacts of the NSIP.

6.2.5 The associated development proposed to be authorised is defined in Schedule 1 of the **Draft DCO [REP6-005]** and explained in the **Explanatory Memorandum [REP5-014]**.

Framework for Determining DCO Applications

6.2.6 Part 6 of the PA 2008 sets out the procedure for deciding applications for DCOs.

6.2.7 Section 104(2) of the PA 2008 provides the basis for determining an application for a DCO in cases where a NPS has effect in relation to the type of development proposed. It states that, in deciding an application, the Secretary of State must have regard to:

- Any relevant NPSs;
- The appropriate marine policy documents (if any);
- Any Local Impact Report submitted to the Secretary of State;
- Any matters prescribed in relation to development of the description to which the application relates; and
- Any other matters which the Secretary of State thinks are both important and relevant to the secretary of State's decision.

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

6.2.9 The following sections provide further detail on the other factors listed in Section 104(2) of the PA 2008.

6.3 Relevant National Planning Policy Statements

6.3.1 The relevant NPSs for determination of the DCO Application in accordance with Section 104(2) of the PA 2008 are:

- NPS EN-1: Overarching National Policy Statement for Energy (January 2024);
- NPS EN-3: National Policy Statement for Renewable Energy Infrastructure (January 2024); and

- NPS EN-5: National Policy Statement for Electricity Networks Infrastructure (January 2024) (Ref-16).

6.3.2 The following paragraphs summarise each NPS. The relevant NPS policies are discussed further in **Section 8** of this Planning Statement and the accompanying **Annex A: National Policy Accordance Tables**, both of which appraise the Scheme's compliance with the relevant policies.

NPS EN-1: Overarching National Policy Statement for Energy

6.3.3 NPS EN-1 sets out the overarching national policy for the submission and assessment of applications relating to energy infrastructure, including solar renewable electricity generation. It covers government policy on the need for NSIPs (including projects determined to be of critical national priority (CNP)) how applications for energy infrastructure will be assessed, and the way in which impacts and mitigations will be judged.

6.3.4 Part 3, paragraph 3.2.6 of NPS EN-1 confirms that the Secretary of State should assess all applications for development consent for the infrastructure covered by NPS EN-1 on the basis that there is an established and urgent need for those types of infrastructure. This includes solar PV developments such as the Scheme. NPS EN-1 paragraphs 3.2.7 and 3.2.8 confirm that substantial weight should be given to this need when considering applications, and the Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in NPS EN-1.

6.3.5 Further, the government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure (NPS EN-1 paragraph 3.3.62), which includes solar PV projects such as the Scheme (NPS EN-1 paragraph 4.2.5). NPS EN-1 paragraph 3.3.63 confirms that, subject to any legal requirements, the urgent need for CNP Infrastructure to achieving the government's energy objects, together with national security, economic, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. NPS EN-1 paragraph 3.3.63 further confirms that the government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible.

6.3.6 NPS EN-1 paragraph 4.1.7 provides further guidance on how the impacts and benefits of a proposal should be weighed by the Secretary of State in the decision-making process. It confirms that, where the application is for CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional circumstances. This presumption, however, does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety,

defence, irreplaceable habitats, the achievement of net zero and onshore flood risk. NPS EN-1 paragraph 4.2.7 also confirms that the presumption applies *following* the normal consideration of the needs case, the impacts of the project, and the application of the mitigation hierarchy. Paragraph 4.2.10 confirms that applicants for CNP Infrastructure must continue to show how their application meets the requirements in the NPSs, together with any other legal and regulatory requirements, and must demonstrate how the mitigation hierarchy has been applied, to show that all residual impacts are those that cannot be avoided, reduced, or mitigated. **Section 9** of this Planning Statement demonstrates how the application meets these tests.

NPS EN-3: National Policy Statement for Renewable Energy Infrastructure

6.3.7 NPS EN-3 provides the technology-specific policy to be considered by the Secretary of State alongside NPS EN-1 when determining applications for renewable energy NSIPs, including solar PV infrastructure. It covers themes such as factors influencing site selection and design, technical considerations for solar PV infrastructure, and particular impacts usually associated with solar sites in terms of ecology, landscape, glint and glare, heritage, construction, agricultural land and decommissioning.

NPS EN-5: National Policy Statement for Electricity Networks Infrastructure

6.3.8 NPS EN-5 principally concerns high voltage long distance transmission and distribution infrastructure, but also applies to other kinds of electricity infrastructure including underground cables at any voltage, and associated development linked to an NSIP. It is therefore considered relevant due to the inclusion of underground cabling, inverters, transformers, switchgear, cabling, and substations within the Scheme.

6.4 Local Impact Reports

6.4.1 As host local authorities, Wiltshire Council and South Gloucestershire Council will have the opportunity to prepare a Local Impact Report (LIR) following submission of the DCO Application, with reference to Section 60 of the PA 2008 and the Planning Inspectorate's NSIP Advice Page for Local Authorities: Local Impact Reports (Ref-17).The LIRs will address relevant local planning policies and set out details of the likely impact of the Scheme on the councils' administrative area (or part of it). It will be considered by the Secretary of State in determining the DCO Application.

6.5 Prescribed Matters

6.5.1 The prescribed matters referred to in Section 104(2)(c) of the PA 2008 are set out in the Infrastructure Planning (Decisions) Regulations 2010 (as amended) (Ref-18). The relevant regulations for the Scheme are as follows:

- Regulation 3: this regulation sets out obligations on the Secretary of State to have regard to the desirability of preserving and listed building and schedule monuments (and their settings) and preserving or enhancing the character of conservation areas. Details of the heritage assets relevant to the Order Limits are considered in **Section 8.3** (Historic Environment) of this Planning Statement and **ES Volume 1, Chapter 12: Cultural Heritage [REP3-017]**;and
- Regulation 7: this regulation states that the Secretary of State must have regard to the United Nations Environmental Programme Convention on Biological Diversity 1992. This is discussed in **Section 8.3**: (Biodiversity and Geological Conservation) of this Planning Statement.

6.6 Other Important and Relevant Matters

Introduction

6.6.1 While the above NPSs set out the principal policy considerations for decision making in relation to NSIPs, other national and local policy may also be considered 'important and relevant' to the Secretary of State's decision making in accordance with Section 105(2)(c) of the PA 2008. This includes the 2025 NPSs, parts of the National Planning Policy Framework (NPPF) (Ref-19), the associated Planning Practice Guidance (Ref-20) and the local development plans for Wiltshire (Ref-21) and South Gloucestershire (Ref-31). This section sets out the context of these other important and relevant policy documents.

2025 Revisions to National Policy Statements

6.6.2 In July 2024, the Chancellor announced a review of the energy NPS to align them with current energy policy and support delivery of Clean Power by 2030 and Net Zero by 2050. This was followed by the Clean Power 2030 Action Plan and proposed updates to the energy NPSs, which were published for consultation in April 2025.

6.6.3 The December 2025 versions of NPS EN-1, EN-3 and EN-5 came into force on 6 January 2026. Transitional provisions apply for the 2025 NPSs which confirm that, for any application accepted for examination before the final publication of the approved 2025 amendments, the November

2023 suite of NPSs (adopted January 2024) should have effect in accordance with the terms of those NPSs. The DCO application was accepted by the Planning Inspectorate on 17 October 2025 **[PD-003],** prior to designation of the December 2025 NPSs. Therefore, under transitional arrangements, the November 2023 NPSs apply to the DCO Application.

6.6.4 Notwithstanding the above, the Applicant considers that the December 2025 NPSs are important and relevant matters to the Secretary of State's decision under section 104(2)(d) of the Planning Act 2008. On this basis, the December 2025 NPSs have been considered in the planning appraisal where relevant, and references to paragraphs of the December 2025 NPSs are included in the planning appraisal at **Section 8** below. Furthermore, **Annex A: National Policy Accordance Tables** accompanying this Planning Statement, sets out a detailed analysis of how the Scheme complies with both the November 2023 NPSs and December 2025 NPSs.

6.6.5 The key updates to each NPS are set out below.

December 2025 NPS EN-1: Overarching National Policy Statement for Energy

6.6.6 The key updates to NPS EN-1 relate to the introduction of the Clean Power Action Plan 2030 and ensuring it is embedded in policy. For example, paragraph 3.3.22 of 2025 NPS EN-1 sets out that, as part of the Clean Power 2030 Action Plan, the UK government has ambitions to deliver *"a range of possible installed capacities for each technology in 2030".* Additionally, paragraph 3.3.25 highlights the key role of electricity storage in meeting the Clean Power 2030 Mission by reducing the amount of generation and associated network that needs to be built to meet peak demand. The added references to the Clean Power Action Plan 2030 further support the need to deliver low carbon energy generation and to rapidly increase the deployment of relevant infrastructure.

6.6.7 2025 NPS EN-1 also refers to the Strategic Spatial Energy Plan which should become a consideration in due course once it has been published and consulted on.

6.6.8 There are also additions relating to the requirements around pre-application consultation, with paragraph 4.2.6 stating that only one such statutory consultation is required by the Planning Act 2008, and paragraph 4.2.9 states where further non-statutory consultation is undertaken:

"Applicants should avoid using these repeated consultations to test the minimum level of mitigation and compensation for impacts. Instead, mitigations should be built in from the start."

6.6.9 2025 NPS EN-1 also emphasises the need for early engagement with all stakeholders to identify issues at an early stage.

6.6.10 In terms of generic impacts on infrastructure projects, there are a few additions within the 2025 NPS EN-1 that may be relevant to the Scheme. Paragraph 5.3.3 includes the need to mitigate climate change impacts:

"Including by improving resource and energy efficiency in the construction, operation, and decommissioning of energy infrastructure where possible."

6.6.11 Paragraph 5.10.19 notes that landscape and visual matters should be considered in the early stages of siting and design, allowing the applicant to demonstrate in the ES how negative effects have been minimised and opportunities for creating positive benefits or enhancement, as has been done with this application.

6.6.12 Paragraph 5.15.12 adds that:

"Applicants are encouraged to prepare a materials management plan to inform the use of construction best practices in relation to storing materials in an adequate and protected place on site to prevent waste, or degeneration of valuable materials, for example, from accidental damage or excessive weathering."

December 2025 NPS EN-3: National Policy Statement for Renewable Energy Infrastructure

6.6.13 There have also been updates to NPS EN-3 to reflect current energy policy. 2025NPS EN-3 places greater emphasis on the Clean Power 2030 Mission, with paragraph 2.10.2 stating that *"Solar energy is at the heart of our Clean Power 2030 Mission".* The draft states that the government is committed to working with industry to radially increase solar capacity by 2030 to boost growth, create jobs and tackle the climate crisis.

6.6.14 2025 NPS EN-3 also reinforces the target deployment range for solar PV of between 45 – 47 GW by 2030 as part of the Clean Power 2030 Action Plan, with scope to exceed the clean power capacity range.

December 2025 NPS EN-5: National Policy Statement for Electricity Networks Infrastructure

6.6.15 Again, 2025 NPS EN-5 reflects alignment with the Clean Power 2030 Action Plan, rather than just 2050 net zero targets.

6.6.16 The 2025 NPS also highlights the need for grid infrastructure to match distributed and spatially diverse generation including in rural parts of the UK.

6.6.17 As identified in 2025 NPS EN-1, the government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure, including electricity grid infrastructure. Paragraph 1.1.17 reflects a step-change in priorities in relation to this, now noting that the appropriate investment and right kind of technology to support CNP infrastructure should be brought in *"as soon as possible".*

National Planning Policy Framework (August 2026)

6.6.18 The NPPF (August 2026) sets out the government's planning policies for England and is a material planning consideration in determination of planning applications under the Town and Country Planning Act 1990 (TCPA 1990) (Ref-22).

6.6.19 NPPF paragraph 13 confirms that the NPPF does not contain specific policies for NSIPs and that applications for NSIPs are to be determined in accordance with the decision-making framework set out in the PA 2008 and relevant NPSs. On this basis, the NPPF is of less relevance to the Secretary of State's decision that the relevant NPSs.

6.6.20 The NPPF is however supported by the Planning Practice Guidance (PPG) and NPS EN-1 does include footnote references to the PPG. Therefore, the NPPF and PPG have been considered in relation to the Scheme, but only where relevant.

6.6.21 It should be noted that this Planning Statement has been updated at Deadline 7 to account for the newly published August 2026 NPPF, including a revised accordance table at **Annex A: National Policy Accordance Tables** to demonstrate the Scheme's compliance with the August 2026 NPPF. However, references to the previous NPPF will appear in other documents, including appendices to the Environmental Statement. To the extent that they are still relevant, these sections should be read together with the wording of the August 2026 NPPF and the policy accordance analysis in Annex A to understand the most up to date policy context.

Local Planning Policy

6.6.22 Policies in adopted and emerging Local Plans are frequently considered important and relevant matters and can influence the content of Local Impact Reports, which the Secretary of State will have regard to in their decision making in accordance with s104(2)(b) of the PA 2008.

6.6.23 **Annex B: Local Policy Accordance Tables** of this Planning Statement sets out local policies that the Secretary of State may consider to be important and relevant in decision-making, and contains an appraisal of the Scheme's compliance against the relevant local policies.

6.6.24 With the exception of the Highways Improvement Areas, the Scheme lies within the administrative area of Wiltshire Council. The adopted Local Plan for Wiltshire comprises:

- The Wiltshire Core Strategy (adopted 2015) (Ref-23);
- Saved local policies from previous local plans (Ref-24);
- The Chippenham Site Allocations Plan (adopted 2017) (Ref-25);
- The Wiltshire Housing Site Allocations Plan (adopted 2020) (Ref-26);
- Made Neighbourhood Plans (Ref-27); and
- The Minerals Core Strategy (adopted 2009) (Ref-28) and supporting minerals and waste documents (Ref-29).

6.6.25 The Wiltshire Local Plan Pre-Submission Draft 2020-2038 (Regulation 19) ('Wiltshire's Draft Local Plan') (Ref-30) was submitted to the Secretary of State for Housing, Communities and Local Government for independent examination on 28 November 2024. However, councillors voted to withdraw the Wiltshire's Draft Local Plan from examination at a full council meeting on 19 May 2026. It is therefore no longer considered to be important and relevant to decision making for this Application. Following withdrawal, Wiltshire Council has published a timetable for a new local plan, with scoping carried out in September 2026 and adoption scheduled for April 2029. However, a draft local plan has not yet been released for consultation (expected in April 2027) and therefore has not been considered in relation to this Application..

6.6.26 The Highways Improvement Areas partially lie within the administrative area of South Gloucestershire Council. The adopted Local Plan for South Gloucestershire comprises:

- The South Gloucestershire Core Strategy (adopted 2013) (Ref-31);
- Policies, Sites and Places Plan (adopted 2017) (Ref-32); and
- The Joint Waste Core Strategy (adopted 2011) (Ref-33).

6.6.27 The adopted Local Plan is currently under review. The Draft South Gloucestershire New Local Plan (Regulation 19) (Ref-34) underwent consultation between February 2025 and April 2025. Following a review of feedback, submission to the Planning Inspectorate for examination is anticipated to take place in September 2025.

6.6.28 Given that only 0.15 ha of the Order limits are located in the administrative area of South Gloucestershire Council (comprising a small section of the Highway Improvement Areas), local planning policy for South Gloucestershire has only been considered in the context of the Highway

Improvement Areas falling within its administrative boundaries, for example, in relation to transport, climate change, and design.

6.7 Other Policy and Legislation

6.7.1 There are other national legislation and policy documents relating to energy and climate change which are considered to be important and relevant considerations. Some of these are discussed in more detail within the **Statement of Need [REP1-085]** and are summarised in the following paragraphs.

The Climate Change Act 2008 and the Climate Change Act 2008 (2050 Target Amendment) Order 2019

6.7.2 The Climate Change Act 2008 (Ref-35) set up a framework for the UK to achieve its long-term goals of reducing greenhouse gas emissions and to ensure steps are taken towards adapting to the impact of climate change. The Climate Change Act committed the UK to reducing its greenhouse gas emissions by at least 80% by 2050 when compared with 1990 levels.

6.7.3 In June 2019, the Climate Change Act 2008 (2050 Target Amendment) Order 2019 was passed to amend the Climate Change Act 2008 and to set a new target requiring the UK to bring all greenhouse gas emissions to net zero (i.e. 100% reduction by 2050, compared with the previous target of at least 80% reduction from 1990 levels).

National Infrastructure Strategy (2020)

6.7.4 The National Infrastructure Strategy (NIS) (Ref-36) was published on 25 November 2020 and sets out plans to transform UK Infrastructure in order to level up the country, strengthen the Union and achieve net zero emissions by 2050. The Government acknowledges in the NIS that to deliver net zero, the share of generation from renewables needs to dramatically increase. It identifies that this can be achieved by the provision of greater generation capacity from onshore wind and solar and sets out commitments for supporting solar generation.

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

6.7.5 The Energy White Paper: Powering our Net Zero Future (2020) (Ref-37) was published in December 2020 and outlines a strategy to transform the energy system, tackling emissions while continuing to ensure secure and reliable supply, and affordable bills for households and businesses.

Net Zero Strategy: Building Back Greener (2021)

6.7.6 The Net Zero Strategy (Ref-38), published in October 2021, sets out a long-term plan for the economy-wide transition to net zero that will take place over the next three decades. On power generation, it confirms that:

"By 2035 the UK will be powered entirely by clean electricity, subject to security of supply; […] 40 GW of offshore wind by 2030, with more onshore, solar and other renewables - with a new approach to onshore and offshore electricity networks to incorporate new local carbon generation and demand in the most efficient manner that takes account of the needs of local communities […]"

British Energy Security Strategy (2022)

6.7.7 The British Energy Security Strategy (Ref-39) sets out the government's ambition to reach 70 GW of solar power by 2035.

Mission Zero – The Skidmore Review (January 2023)

6.7.8 The Skidmore Review (Ref-40) is an independent review of net zero and one of the largest engagement exercises on net zero in the UK. The Review conclusions recognise that net zero is the economic opportunity of the 21st century and that the UK is well placed to take advantage. It confirms that a double down is required on the production of renewables, nuclear and hydrogen and other low carbon fuels to give the UK's future energy system a homegrown, secure platform. Recommendations in the Review show how action can be taken in the short, medium and long term to turbocharge delivery, set clear roadmaps that provide the certainty needed for investment and research and development, and deliver net zero in a pro-growth, pro-business, low-cost way. This includes recommendations on streamlining the planning process, and deployment of a roadmap for solar power including clear milestones to reach 70 GW of solar power by 2035.

Powering Up Britain (March 2023)

6.7.9 Powering Up Britain (March 2023) (Ref-41) presents the Government's ambition to double Britain's electricity generation capacity by the late 2030s and to deploy 70 GW of solar energy generation by 2035, made up of both ground-mounted and rooftop solar. It recognises that ground-mounted solar is one of the cheapest forms of electricity generation and is readily deployable at scale. It confirms that the government considers meeting energy security and climate change goals as urgent and of critical importance to the country, and that these goals can be achieved together with maintaining food security for the UK. Whilst this policy paper was published under the 2022-2024 Sunak Conservative Government and the

current Labour Government has since published a subsequent policy paper (see the Clean Power 2030 Action Plan), the broad aims of both are consistent.

Clean Power 2030 Action Plan: A New Era of Clean Electricity (December 2024)

6.7.10 Clean Power 2030 Action Plan: A New Era of Clean Electricity (December 2024) sets out how the Government will deliver on the Prime Minister's Plan for Change to build an energy system that can bring down bills for households and businesses for good. The Action Plan provides that electricity generated by renewables and nuclear power will be the backbone of a clean electricity system by 2030, and sets out actions to support the delivery of renewable generation projects (include BESS) including by de-risking the existing pipeline, accelerating new projects through the pipeline, and maximising the potential of existing capacity as assets approach end-of-life. It sets out the government's target of 45-47 GW of operational solar by 2030.

Planning and Infrastructure Bill (2024-2025)

6.7.11 The Planning and Infrastructure Bill (2024-2025) (Ref-43) aims to accelerate critical housing and infrastructure delivery by reducing delays and legal hurdles. It is of particular relevance to NSIPs in that it includes reforms that aim to shorten the overall timeline for DCOs by reducing pre-application consultation requirements, limiting judicial review stages and simplifying minor amendments to applications post-submission. It is also important for solar projects as it aims to introduce a shift to a "first ready, first connected" grid access system which means that schemes of earlier readiness are able to connect to the grid and avoid long delays due to grid queue backlogs. The Bill also indicates support for projects that help balance the grid through energy storage systems, such as BESS, which is included as Work No.2 as part of the Associated Development in the Scheme. It should be noted that this is a bill, meaning it is currently only proposed legislation and has not yet become law, so its provisions are subject to change during the parliamentary process.

Infrastructure Planning (Onshore Wind and Solar Generation) Order 2025

6.7.12 The Infrastructure Planning (Onshore Wind and Solar Generation) Order 2025 (Ref-44) is a statutory instrument set to come into force on 31 December 2025 that amends the PA 2008 to adjust the thresholds and planning processes for onshore wind and solar energy projects. The key amendment for solar generation is that the threshold for solar projects to be considered NSIPs has been increased from 50 MW to 100 MW. Whilst

even with this change the Scheme remains well beyond the new threshold, it is of note that this represents the Government's broader strategy to support new solar generation schemes and streamline the planning process.

Progress Report to Parliament Climate Change Committee (June 2025)

6.7.13 The 2025 Progress Report (Ref-42) was laid before Parliament on 25 June 2025 pursuant to Section 36(1) of the Climate Change Act 2008 to provide an update on the UK's position in meeting its carbon budgets and targets. It reports that solar capacity is currently off track, with around 18 GW of solar capacity installed, and a further 5 GW contracted to bring total capacity up to 23 GW in 2027. To meet the government's target of 45-47 GW of operational solar by 2030 as set out in its Clean Power 2030 Action Plan, operational solar capacity will need to increase four-fold compared to the average rate seen since the start of the decade.

Solar Roadmap

6.7.14 The government's Solar Roadmap (Ref-45), published in June 2025, outlines a comprehensive strategy to accelerate solar energy deployment, aiming for 45-47 GW of installed capacity by 2030, with scope to exceed the 47 GW upper limit. The key action in the roadmap in relation to the Scheme is the aim to streamline the grid connection process for solar. The roadmap focuses on reforms to improve capacity and connection timelines, which is critical for NSIP schemes that need stable and predictable grid access to be viable. Additionally, the document is another indication of the Government's broad policy alignment with support for solar schemes, demonstrating how this Scheme is central to the UK's broader clean energy strategy.

6.8 Additional Consents

6.8.1 A DCO, if granted, has the effect of providing consent for development in addition to a range of other consents and licences where specified as well as removing the need for some consents such as planning permission. Details of the consents and licences included in the **Draft DCO [REP6-005]** are explained in the **Explanatory Memorandum [REP5-014]** and the **Consents and Agreement Position Statement [APP-272]**. The latter also includes a list of likely consents to be sought outside the DCO process.

7 Ongoing Engagement

7.1.1 Details of the engagement carried out by the Applicant in relation to the Scheme are set out in the **Consultation Report [APP-022]**. Pre-application consultation activities are also detailed in **Section 1.4** of this Planning Statement.

7.1.2 The Applicant has prepared and maintained an Issues Tracker during the pre-application stage to identify and track key issues, identify affected parts, encourage engagement on matters and where possible, achieve resolution prior to submission of the DCO Application.

7.1.3 The Issues Tracker has been used to inform the production of the **Potential Main Issues for the Examination [APP-289]** document, which has been submitted into the Examination as an application document.

7.1.4 The Applicant also intends to use the Issues Tracker to inform production of a number of Statements of Common Ground (SoCGs) to document matters between the Applicant and the stakeholder which are agreed, not agreed, and which are the subject of ongoing discussion. The Applicant expects the Examining Authority to request the following SoCGs after acceptance of the DCO Application:

- Wiltshire Council;
- South Gloucestershire Council;
- Natural England;
- Historic England;
- Environment Agency;
- Cotswolds National Landscape Board;
- National Highways;
- Network Rail;
- Wessex Water;
- Severn Trent Water; and
- National Grid.

8 Planning Appraisal

8.1 Introduction

8.1.1 This section sets out the Applicant's appraisal of the Scheme's compliance with the main relevant policy and legislative requirements, as identified in **Section 6** of this Planning Statement. The appraisal considers the construction, operation and maintenance, and decommissioning phases of the Scheme. This section considers the following matters, following the topics set out in NPS EN-1 and NPS EN-3

8.1.2 The following Assessment Principles, as set out in NPS EN-1:

- General Principles;
- The Critical National Priority for Low Carbon Infrastructure;
- Habitats and Species Regulations;
- Environmental Effects/Considerations;
- Alternatives and Site Selection;
- Health;
- Environmental and Biodiversity Net Gain;
- Good Design for Energy Infrastructure;
- Climate Adaptation and Resilience;
- Network Connection;
- Pollution Control and Other Environmental Regulatory Regimes;
- Safety;
- Hazardous Substances;
- Common Law Nuisance and Statutory Nuisance; and
- Security Considerations.

8.1.3 The following Generic Impacts, as outlined in NPS EN-1 and NPS EN-3:

- Air Quality and Emissions;
- Greenhouse Gas Emissions;
- Biodiversity and Geological Conservation;
- Civil and Military Aviation and Defence Interests;
- Dust, Odour and Artificial Light;

- Flood Risk;
- Historic Environment;
- Landscape and Visual;
- Land Use, including Open Space, Green Infrastructure, Green Belt and Agricultural Land;
- Noise and Vibration;
- Socio-economic Impacts;
- Traffic and Transport;
- Resource and Waste Management;
- Water Quality and Resources;
- Mineral Safeguarding;
- Glint and Glare; and
- Cumulative Impacts.

8.1.4 This section is not intended to list all relevant planning policy but instead focus on the Scheme's compliance with the main policies relevant to decision making. **Annex A: National Policy Accordance Tables** and **Annex B: Local Policy Accordance Tables**, accompanying this Planning Statement, set out a more detailed analysis of the specific policies relevant to the Scheme and how the Scheme accords with them.

8.2 Assessment Principles

8.2.1 This subsection sets out an appraisal of the Scheme's compliance with the assessment principles set out in NPS EN-1 and NPS EN-3. This includes the general and solar-specific policies for the submission and assessment of energy infrastructure applications. Where appropriate, consideration has been given to the weighting that might be applied in the planning balance.

General Principles

8.2.2 NPS EN-1 Part 4.1 sets out the general considerations that the Secretary of State should consider when assessing applications. These are summarised briefly below.

Presumption in favour of development

8.2.3 NPS EN-1 paragraph 4.1.3 provides that, given the level of urgency of need for energy infrastructure (including solar), 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.

8.2.4 There is a clear and urgent need for the Scheme as set out in **Section 5** of this Planning Statement. As set out in the remainder of this Planning Statement, the Applicant considers that this presumption should apply and that there are no other relevant policies that should disapply it.

Weighing impacts and benefits

8.2.5 NPS EN-1 paragraph 4.1.5 sets out the types of potential impacts and benefits that the Secretary of State should take into account when considering a proposed development, including benefits and impacts at national, regional and local levels. Any residual adverse effects that remain after proposed mitigation measures should be weighed against the benefits of the proposed development. For projects that qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional circumstances.

8.2.6 The substantial benefits of the Scheme are summarised in **Section 5** of this Planning Statement. Potential residual adverse impacts are discussed in the relevant topic chapter of the **ES [EN010168/APP/6.1 to EN010168/APP/6.4]**, summarised in this Section and the planning balance is applied in **Section 9** of this Planning Statement.

Land Rights

8.2.7 NPS EN-1 paragraph 4.1.8 includes provision for compulsory acquisition of land or rights over that land, applications for which will be considered by the Secretary of State under the usual compulsory acquisition principles (NPS EN-1 paragraph 4.1.9). The rights being sought to construct, operate and decommission the Scheme are set out in the **Statement of Reasons [APP-018]** and the **Book of Reference [APP-020]**.

Development Consent Obligations

8.2.8 The Secretary of State may consider any development consent obligations that an applicant agrees with local authorities (NPS EN-1 paragraph 4.1.18). The Applicant does not envisage development consent obligations under section 106 of the Town and Country Planning Act 1990 (as amended by section 174 of the Planning Act 2008) applying to the Scheme.

Early engagement

8.2.9 Paragraph 4.1.19 of NPS EN-1 strongly encourages early engagement in line with the government's pre-application guidance between the applicant, key stakeholders and those likely to have an interest in the application. Only applications which are fully prepared and comprehensive can be accepted for examination. Details of the pre-application consultation carried out by the Applicant are set out in the **Consultation Report [APP-022].**

Financial and technical feasibility

8.2.10 NPS EN-1 paragraph 4.1.22 confirms that where the Secretary of State considers that the financial viability and technical feasibility of the proposal has been properly assessed by the applicant, it is unlikely to be of relevance in Secretary of State decision making except in limited circumstances. The **Funding Statement [APP-019]** which accompanies this application considers the financial and technical viability of the Scheme.

The Critical National Priority for Low Carbon Infrastructure

8.2.11 As set out in **Section 5** of this Planning Statement, the Scheme is classed as CNP Infrastructure. Paragraph 4.2.4 of NPS EN-1 sets out that the:

"Government has therefore concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure."

8.2.12 The definition of CNP Infrastructure is provided at paragraph 4.2.5 of NPS EN-1 and includes all onshore and offshore electricity generation that does not involve fossil fuel production, such as the Scheme. Paragraph 4.2.6 of NPS EN-1 is clear that:

"The overarching need case for each type of energy infrastructure and the substantial weight which should be given to this need in assessing applications, as set out in paragraphs 3.2.6 to 3.2.8 of EN-1, is the starting point for all assessments of energy infrastructure applications."

8.2.13 Whilst the urgent need for the Scheme is established, paragraph 4.2.10 of NPS EN-1 makes clear that:

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

8.2.14 Paragraph 4.2.11 of NPS EN-1 clarifies that applicants must show how the mitigation hierarchy has been applied and paragraph 4.2.12 of NPS EN-1 states that applicants should set out how residual impacts will be compensated. In line with this, the mitigation hierarchy has been applied and the Scheme has been appraised against planning policy *before* the CNP presumption has been considered. **ES Volume 1, Chapter 6: EIA Methodology [EN010168/APP/6.1]** sets out the mitigation hierarchy approach adopted in the wider **ES [EN010168/APP/6.1 to EN010168/APP/6.4]** and demonstrates how this has been applied. **Section 9.5** of this Planning Statement then goes on to consider the application of the CNP presumption in the context of any residual adverse effects, following consideration of the need case, the impacts of the Scheme, and the application of the mitigation hierarchy.

Habitats and Species Regulations

8.2.15 NPS EN-1 paragraph 4.2.18 confirms that any Habitats Regulations Assessment (HRA) residual impacts will be considered under the framework set out in the Habitats Regulations (under the Conservation of Habitats and Species Regulations 2017).

8.2.16 The Applicant's **Habitats Regulations Assessment Report [REP3-090]** is discussed in further detail in **Section 8.3** (Biodiversity and Geological Conservation) of this Planning Statement and concludes that no significant adverse effects on the site integrity of the relevant protected sites are deemed likely, either in isolation or in combination with other projects.

Environmental Effects/Considerations

8.2.17 All proposals subject to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) must be accompanied by an ES describing the aspects of the environment likely to be significantly affected by the project (NPS EN-1 paragraph 4.3.1). Paragraph 4.3.4 of NPS EN-1 provides that the applicant must set out information on the likely environmental, social and economic effects of a development, and show how any negative effects would be avoided, reduced or mitigated. Where precise details of the proposed development have not been defined, the applicant should explain this, and assess the likely worst-case scenario of effects (the Rochdale Envelope) to ensure the impacts of the project have been properly assessed (NPS EN-1 paragraph 4.3.12) and, in decision making, the Secretary of State should consider those worst-case impacts (NPS EN-1 paragraph 4.2.18). The Secretary of State should also have regard to the ambitions, goals and targets set out in the government's Environmental Improvement Plan for improving the natural environment and heritage, including achievement of

statutory targets set under the Environment Act 2021 (NPS EN-1 paragraph 4.3.20).

8.2.18 In accordance with the above assessment principles, the **ES [EN010168/APP/6.1 to EN010168/APP/6.4]** sets out the likely significant effects arising from the Scheme. The scope and methodology of the EIA is set out in **ES Volume 1, Chapter 6: EIA Methodology [EN010154/APP/6.1]**. The Scoping Opinion, published by the Planning Inspectorate on 22 August 2024 (**ES Volume 3, Appendix A: EIA Scoping [EN010168/APP/6.3]**) forms the basis of the assessments undertaken. The **ES [EN010168/APP/6.1 to EN010168/APP/6.4]** has been prepared in accordance with paragraphs 4.3.4 and 4.3.12 of NPS EN-1.

Alternatives and Site Selection

General Planning Policy Context

8.2.19 Part 4.3 of NPS EN-1 and Part 2.3 of NPS EN-3 set out the assessment principles applicable to the consideration of alternatives. There is no prescribed methodology in national planning policy or guidance for site selection in relation to solar development. Paragraph 4.3.9 of NPS EN-1 states that:

"This NPS does not contain any general requirement to consider alternatives or to establish whether the proposed project represents the best option from a policy perspective."

8.2.20 And paragraph 2.3.5 of NPS EN-3 is clear that, in general, the government does not seek to direct applicants for renewable energy infrastructure to specific sites. Instead, NPS EN-3 Paragraph 2.3.9 recognises that:

"most renewable energy resources can only be developed where the resource exists and where economically feasible, and because there are no limits on the need established in Part 3 of EN-1, the Secretary of State should not use a consecutive approach in the consideration of renewable energy projects (for example, by giving priority to the re-use of previously developed land for renewable technology developments)".

8.2.21 Whilst there is no general legal or planning policy requirement to consider alternatives, applicants are obliged to include information about the reasonable alternatives they have studied in their ES (NPS EN-1 paragraph 4.3.15) and where there is a specific policy requirement to do so. Paragraph 4.3.22 of NPS EN-1 provides that, given the level of urgency for new energy infrastructure, the Secretary of State should (subject to any specific policy indicating otherwise), be guided by the

following principles when deciding what weight should be given to alternatives:

- Consideration of alternatives to comply with policy requirements should be carried out in a proportionate manner; and
- Only alternatives that can meet the objectives of the proposed development need to be considered.

8.2.22 The Secretary of State should not refuse an application simply because fewer adverse impacts would result from developing another suitable site, and should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future energy proposals (NPS EN-1 paragraph 4.3.24).

8.2.23 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 (NPS EN-1 paragraph 4.2.27).

Appraisal

8.2.24 **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** describes the consideration of alternatives carried out by the Applicant in relation to the Site for the Scheme, layouts and choice of technology. This includes an appraisal of alternatives suggested in responses to the Scoping Request (see **ES Volume 3, Appendix A: EIA Scoping [EN010168/APP/6.3]**) and Statutory Consultation. It is supported by **ES Volume 3, Appendix 4-1: Site Selection Assessment Report (SSAR) [APP-185]** which provides an appraisal of alternative sites within a 20 km radius of the Existing National Grid Melksham Substation. The SSAR concludes that there are no more suitable and available locations within the 20 km search area than the proposed location for the Scheme, based on the criteria identified. A summary of the Applicant's site selection assessment is provided below (for full details, see **ES Volume 3, Appendix 4-1: Site Selection Assessment Report (SSAR) [APP-185]**).

Stage 1: identification of the Area of Search near the available grid connection point

8.2.25 Following discussions with National Grid, a point of connection was identified at the Existing National Grid Melksham Substation which has available capacity for a utility scale energy project. This is the last major grid connection available in the area that can be delivered pre-2030 in line with the government's Clean Power 2030 Action Plan targets and can be realised quickly and efficiently by utility scale solar. It is therefore ideally

placed as a point of connection for the Scheme as the Scheme can be constructed and commissioned by 2030.

8.2.26 Once the point of connection was identified, the Applicant set an area of search, in which to consider available sites for the Scheme. An initial search area was identified at a 5 km radius from the Existing National Grid Melksham Substation, however, this was later expanded as no suitable and available sites within 5 km were identified in the Applicant's initial high-level searches. The search area was enlarged incrementally to a 20 km radius, which is considered by the Applicant to be a viable cable connection distance for a solar project of this scale.

Stage 2: exclusion of various planning, environmental and spatial constraints to identify the most unconstrained land

8.2.27 Stage 2 involved a high-level assessment of the 20 km area of search, using publicly available data to identify any planning, environmental and spatial constraints to be excluded from the 20 km search area. This was informed by planning policy, for instance, regarding the preference to site development on poorer quality and non-BMV agricultural land where possible (NPS EN-3 paragraph 2.10.29) and use sites at a lower risk of flooding (NPs EN-1 paragraph 5.8.21). See **ES Volume 3, Appendix 4-1: Site Selection Assessment Report (SSAR) [APP-185]**) for further details of the policy considerations that informed the exclusion of the various constraints at stage 2.

8.2.28 Land constrained by the following categories were excluded: Grade 1, 2 and 3 agricultural land; Flood Zones 2 and 3; nationally designated landscapes; Sites of Special Scientific Interest; Special Areas of Conservation; Special Protection Areas (SPA); SPA protection buffers; Ramsar Sites; National Nature Reserves; ancient and non-ancient woodland; Scheduled Monuments; World Heritage Sites; Registered Battlefields; Registered Parks and Gardens; dense concentrations of listed buildings; conservation areas; and the Bath Green Belt. Consideration was also given to the proximity of nearby sensitive human receptors which include residential dwellings and populated areas/villages.

Stage 3: Application of considerations around site size and land assembly, use of previously developed land and topography to identify potential development areas on the remaining land

8.2.29 At stage 3 of the assessment, key operational criteria were applied to remaining land within the 20 km search area to identify alternative potential development areas for the Scheme.

8.2.30 This included consideration of previously developed land including brownfield land and commercial rooftops, however, no land was identified

that would be of an adequate area to facilitate a utility-scale solar project (either individually or in combination with other sites).

8.2.31 At this stage, a topography limitation was applied to the search area on the basis that flatter land is preferred for solar development. Only land with a gradient of 3% or less was taken forward to stage 4. However, land at a higher gradient was considered later in the process.

8.2.32 As to site size, areas of unconstrained land of at least 40 ha were taken forward to stage 4, except where the land parcels were isolated and therefore not viable to join with other parcels. Areas in proximity to each other that offered around 1,100 ha in total were preferred, but smaller areas (approximately 250 ha and above) were also included and assessed, particularly where there was potential to join sites with others.

8.2.33 At the end of stage 3, four potential development areas (PDAs) were identified as possible alternative locations for the Scheme, and these were taken forward for stage 4 assessment.

Stage 4: evaluation of the identified potential development areas against assessment indicators as assess suitability for a project equivalent to the Scheme

8.2.34 At stage 4, the four PDAs identified were subject to a desktop assessment using set evaluation criteria to assess their suitability as alternatives for the Scheme. Ultimately, none of the four PDAs were considered suitable alternatives for the reasons set out in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report (SSAR) [APP-185].** Therefore, the search was widened to consider previously discounted land within the 20 km search area, being Grade 3 agricultural land and land within Floods Zones 2 and 3.

Stage 5: widening the search to consider further potential development areas on parcels of Grade 3 agricultural land, and land within flood zones 2 and 3

8.2.35 At stage 5, Grade 3 agricultural land and land within Floods Zones 2 and 3 were considered. The search for sites at Stage 5 was undertaken with the help of land agents. It was considered desirable to compile a site in as few land ownerships as possible to minimise legal complexities and project costs. The land agents therefore used their professional knowledge to provide details of potentially willing landowners with large scale land holdings within the 20 km search area.

8.2.36 Six PDAs were identified at Stage 5 adopting the above methodology. These were then assessed against the same planning, environmental and operational considerations that were applied at Stages 2 to 4 to assess the Stage 4 PDAs. It should be noted that, in places, the Stage 5 PDAs

encroach into areas of Grade 2 agricultural land and land with a greater topographic gradient, that would not have been considered applying the Stage 2 and 3 criteria. In order to incorporate entire land parcels suggested by land agents, these areas have not been excluded from the PDAs, but have been considered and rated accordingly in the Stage 5 assessment.

8.2.37 As a check and balance, other Grade 3 land and land within Flood Zones 2 and 3 that has not been identified by land agents was mapped and given high level consideration against environmental constraints.

8.2.38 None of the sites identified at this stage were considered to offer a more suitable and available location than the proposed location for the Scheme.

Stage 6: widening the search to consider further potential development areas on parcels of land with a higher gradient (5% or less)

8.2.39 Finally, the search within the 20 km search area was widened to capture any additional available unconstrained land with a gradient of 5% or less. This has been carried out in acknowledgement of ongoing discussions and design work across IGP projects, where land at a steeper gradient has been included within the search for sites. The Stage 6 assessment applies the same methodology of stages 1-5 (including the re-introduction of Grade 3 agricultural land and land within Flood Zones 2 and 3), with the exception of topography.

8.2.40 None of the sites identified at this stage were considered to offer a more suitable and available location than the proposed location for the Scheme.

Summary of Site Selection Assessment

8.2.41 In summary, the Applicant has demonstrated that it has carried out an extensive site selection assessment as detailed in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report (SSAR) [APP-185]**.

Topic specific requirements to consider alternatives

8.2.42 Within the remainder of NPS EN-1 and NPS EN-3, there are also the following specific topic references to the consideration of alternatives:

- **Compulsory acquisition**: NPS EN-1 paragraph 4.3.9 confirms there are specific requirements to consider alternatives regarding compulsory acquisition. The Applicant is seeking compulsory acquisition powers over land if it cannot be secured through voluntary agreement. Further details are contained within the **Statement of Reasons [EN010168/APP/4.1]**;
- **Air quality**: NPS EN-1 paragraph 5.2.7 provides that projects near a sensitive receptor site for air quality should only be proposed in

exceptional circumstances if no viable alternative is available. **ES Volume 1, Chapter 15: Air Quality [REP2-008]** details the relevant air quality sensitive receptors and concludes there are no likely significant effects identified as a result of the Scheme in relation to air quality and no need for additional mitigation measures beyond embedded mitigation;

- **Biodiversity and geological conservation interests**: NPS EN-1 paragraph 5.4.42 provides that development should aim to avoid significant harm to biodiversity and geological conservation interests, including through consideration of reasonable alternatives. As set out in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010]**, there is anticipated to be residual significant adverse effects on hedgerows and 'breeding birds - ground nesting birds of open habitats', but there are also residual significant beneficial effects anticipated for various other important ecological features including but not limited to grassland, woodland, ponds, other hedgerows, ditches and watercourses, badgers, bats, dormice, hare, amphibians, reptiles, terrestrial invertebrates, and other species of breeding birds. Further, the Scheme will deliver, as a minimum, 10% BNG, which is secured via Requirement 9 in **Schedule 2 to the Draft DCO [REP6-005].** The **BNG Assessment Report [EN010168/EXAM/7.8 and as updated for Deadline 7]** indicates that BNG in excess of 10% will be achieved, with a total net gain of 65.35% for area habitat units, 19.39% for hedgerow units and 25.30% for watercourse units in relation to the Solar PV Sites. The total net gain for the whole Scheme (i.e. Solar PV Sites and Cable Route Corridor combined) is 37.64% for area habitat units, 12.77% for hedgerow units and 19.89% for watercourse units;
- **Flood risk**: paragraph 5.8.21 of NPS EN-1 details the Sequential Test and the requirement to follow a sequential, risk based approach to site selection, steering new development to areas with lowest risk of flooding. Where it is not possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites within medium risk areas and then, only where there are no reasonably available sites in low and medium-risk areas, within high-risk areas. **Annex C: Sequential and Exception Test** of this Planning Statement assesses alternative sites and design in the context of flood risk. It identifies no more suitable sites in areas of lower flood risk and concludes that the Scheme meets the Sequential and Exception Test;
- **Development within National Parks, the Broads and National Landscapes**: NPS EN-1 paragraph 5.10.32 confirms that developments within National Landscapes may be granted

development consent in exceptional circumstances and that such applications should include an assessment of alternatives which would see the development placed outside of the National Landscape. In such cases, the conservation and enhancement of the natural beauty of the landscape should be given substantial weight (changed in 2025 NPS EN-1 to 'great' weight). The majority of the Scheme is located outside of, the CNL, but one of the proposed construction vehicle routes for the Solar PV Sites passes through the CNL and four Highways Improvement Areas are located within the CNL where works are required to existing roads and junctions to make them suitable for construction traffic. **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** sets out the alternative locations for the Scheme that have been assessed, together with alternative construction route options to avoid routing construction traffic through the CNL. It concludes that there are no locations within the 20 km radius search area from the Existing National Grid Melksham Substation that are more suitable than the Solar PV Sites for the Scheme, and that none of the alternative construction routes considered to avoid the CNL are viable. It also sets out the design alternatives and evolution from the Scheme's inception, including details of how the Order Limits and layout of the Solar PV Sites has evolved to seek to further the purpose of conserving and enhancing the natural beauty of the CNL, including the removal of Solar PV Panels in areas closest to the CNL boundary. Further details on the application of NPS EN-1 paragraph 5.10.32 are provided in section 8.3: Landscape and Visual Impact below; and

- **Agricultural Land**: NPS EN-3 acknowledges that ground mounted solar is not prohibited on BMV land (NPS EN-3 paragraph 2.10.30), and states that while land type should not be a predominating factor in determining a site's suitability for solar development, poorer quality land should be preferred and BMV land avoided where possible (NPS EN-3 paragraph 2.10.29). The choice of site should be explained by the Applicant, noting a preference for development to be situated on suitable brownfield, industrial and low and medium grade agricultural land. As set out above, the Applicant has sought to avoid BMV land in its site selection process, initially preferring non-BMV land in its search for alternative sites for the Scheme, before exploring BMV land. Further appraisal of the use of BMV land, and why this is justified, is set out in **Section 8.3** (Land Use) of this Planning Statement.

8.2.43 In summary, reasonable alternatives have been studied in line with the above policy requirements.

Health

8.2.44 NPS EN-1 paragraphs 4.4.1 and 4.4.2 sets out some of the potential impacts of energy infrastructure on health, including increased traffic, air or water pollution, dust, odour, hazardous waste and substances, noise, exposure to radiation and increase in pests. New energy infrastructure may also affect the size and composition of the local population, which can have impacts on access to public services, transport and access to recreation spaces (NPS EN-1 paragraph 4.4.3). Where a proposed project has an effect on humans, the ES should assess these effects and identify measures to avoid, reduce or compensate for these impacts (NPS EN-1 paragraph 4.4.4).

8.2.45 In decision making, generally those impacts which are most likely to have a significantly detrimental impact on health are subject to separate regulation which will constitute effective mitigation of them, and therefore it is unlikely that health concerns by themselves will constitute a reason to refuse consent or require specific mitigation under the Planning Act 2008 (NPS EN-1 paragraph 4.4.7). However, not all impacts will be mitigated in this way and NPS EN-1 paragraph 4.4.8 confirms that the Secretary of State may want to take account of health concerns when setting requirements relating to a range of impacts such as noise.

8.2.46 **ES Volume 1, Chapter 18: Human Health [APP-070]** provides an assessment of the likely significant effects on human health as a result of the Scheme including on social environment (housing, open space leisure and play, transport modes access and connections, community identity culture resilience and influence) economic environment (education and training, employment and income), bio-physical environment (air quality, water quality or availability, land quality, noise and vibration), and institutional built environment (health and social care services). It concludes that no residual significant effects from the Scheme on human health are anticipated at any stage of the Scheme following the implementation of embedded and additional mitigation. Non-significant residual effects are anticipated, including temporary effects on transport modes, access and connections, housing, open space, leisure and play, education and training, and air quality. A full list is provided in **ES Volume 3, Appendix 18-3: Human Health Summary of Non-Significant Effects [APP-246]**. As a result, it is considered that effects on human health should be afforded neutral weight in the planning balance.

Environmental and Biodiversity Net Gain

8.2.47 NPS EN-1 paragraph 4.6.6 provides that:

"Energy NSIP proposals… should seek opportunities to contribute to and enhance the natural environment by providing net gains for biodiversity and the wider environment where possible."

8.2.48 Applicants are encouraged to calculate the BNG outcomes in line with the latest version of the biodiversity metric and present the calculation data in full as part of their application (NPS EN-1 paragraph 4.6.7).

8.2.49 Applicants for development consent should be accompanied by a statement demonstrating how opportunities for delivering wider environmental net gains have been considered and, where appropriate, incorporated into proposals as part of good design (including any relevant operational aspects) of the project (NPS EN-1 paragraph 4.6.15). Examples of wider environmental gains are set out in NPS EN-1 paragraph 4.6.13 and include reduction in GHG emissions, reduction in flood risk, improvements to air or water quality, climate adaptation, landscape enhancement, increased access to natural greenspace and or the enhancement, expansion or provision of trees and woodland.

8.2.50 NPS EN-1 paragraph 4.6.19 confirms that BNG is not currently an obligation on applicants, but Schedule 15 of the Environment Act 2021 contains provisions which, when it comes into effect, the Secretary of State may not grant an application for a DCO unless satisfied that a biodiversity gain objective is met in relation to the onshore development in England to which the application relates. NPS EN-1 paragraph 4.6.21 confirms that, in decision making:

"The Secretary of State should give appropriate weight to environmental and biodiversity net gain, although any weight given to gains provided to meet a legal requirement (for example under the Environment Act 2021) is likely to be limited."

8.2.51 Solar farms are typically a good opportunity for BNG due to the change of land use from intensively managed agriculture to a grassland habitat under and around the solar PV panels, which can be sensitively managed to maximise ecological value. The **Design Approach Document [APP-268]** summarises how the design for the Scheme has evolved iteratively, in line with the project's design principles, including the design principle to achieve a minimum of 10% net gain for biodiversity through strategic habitat creation and enhancements measures. As set out in **Section 5.3** of this Planning Statement, a variety of habitat creation and landscape enhancements are proposed as part of the Scheme, including new hedgerow and tree planting, reinforcement planting at existing hedgerows and field boundaries, extensive grassland habitat creation and sympathetic management both within buffers and under the Solar PV arrays, as well as discrete, valuable habitat creation away from the Solar PV Panels. Details of the enhancements are set out in the **ES Volume 2,**

Figure 3-4: Landscape and Ecology Mitigation Plan [REP6-037] and measures to ensure implementation are set out in **Outline LEMP [REP6-037],** to be secured by Requirement 7 in Schedule 2 to the **Draft DCO [REP6-005]**.

8.2.52 The Scheme will deliver, as a minimum, 10% BNG, which is secured via Requirement 9 in **Schedule 2 to the Draft DCO [REP6-005]. The BNG Assessment Report [EN010168/EXAM/7.8 as updated for Deadline 7]** indicates that BNG in excess of 10% will be achieved, which is secured via Requirement 9 in Schedule 2 to the **Draft DCO [[REP6-005]**, with a total net gain of 65.35% for area habitat units, 19.39% for hedgerow units and 25.30% for watercourse units in relation to the Solar PV Sites. The total net gain for the whole Scheme (i.e. Solar PV Sites and Cable Route Corridor combined) is 37.64% for area habitat units, 12.77% for hedgerow units and 19.89% for watercourse units.

8.2.53 In summary, the Scheme accords within the relevant policies in NPS EN-1 paragraph 4.6.6 and 4.6.15 in relation to BNG, with a Requirement in the **Draft DCO [REP6-005]** (Requirement 9) to deliver at least 10% BNG (Requirement 9), and it is anticipated that the Scheme will provide significant BNG in excess of 10%. On that basis, it is considered that the Scheme's contribution to BNG should be afforded moderate positive weight in the planning balance.

Good Design for Energy Infrastructure

8.2.54 NPS EN-1 Part 4.7 sets out the criteria for good design for energy infrastructure. Paragraph 4.7.2 NPS EN-1 provides that:

"Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is acknowledged, however that the nature of energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area."

8.2.55 NPS EN-1 paragraph 4.7.6 provides that whilst applicants may not have any or very limited choice in the physical appearance of some energy infrastructure, there are still opportunities to demonstrate good design in terms of siting relative to existing landscape character, landform and vegetation, the use of sensitive materials, and incorporating nature inclusive design.

8.2.56 Good design is also a means by which many policy objectives of the NPSs can be met, as good design can help mitigate adverse impacts of a

project such as measures to reduce noise, and use of sustainable materials (NPS EN-1 paragraph 4.7.3).

8.2.57 As set out in NPS EN-1 paragraph 4.7.5, design principles should be established from the outset of the project to guide the development from conception to operation, and applications should consider how their design principles can be applied post-consent. NPS EN-1 paragraph 4.7.7 confirms that applicants must demonstrate in their application documents how the design process was conducted and how the design has evolved. Where a number of different designs were considered, applicants should set out the reasons why the favoured choice has been selected.

8.2.58 In decision making, the Secretary of State must 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 (NPS EN-1 paragraph 4.7.10). Paragraph 4.7.11 of NPS EN-1 outlines that the Secretary of State:

"Should be satisfied the applicant has considered both functionality (including fitness for purpose and sustainability) and aesthetics (including its contribution to the quality of the area in which it would be located, any potential amenity benefits, and visual impacts on the landscape as far as possible."

8.2.59 In addition to the general principles for energy infrastructure outlined above, NPS EN-3 contains technology specific policy on good design for solar projects. NPS EN-3 paragraph 2.5.2 provides that:

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

8.2.60 NPS EN-3 paragraphs 2.10.18 to 2.10.48 set out factors influencing the site selection and design of solar projects. This includes irradiance and topography; network connection; proximity to dwellings; agricultural land classification and land type; accessibility; PRoW and security and lighting. Paragraphs 2.10.49 to 2.10.69 of NPS EN-3 set out further technical considerations regarding the design and layout of sites.

8.2.61 Paragraphs 2.10.70 to 2.10.72 of NPS EN-3 discuss the flexibility in the project details. This is also set out in paragraphs 2.2.1 to 2.2.8 of NPS EN-5 which consider factors influencing site selection and design for electricity networks infrastructure:

"There will usually be a degree of flexibility in the location of the development's associated substations, and applicants should consider carefully their location, as well as their design." (paragraph 2.2.8)

8.2.62 The Applicant is seeking flexibility in the design of the Scheme, as explained in **Section 4.4** of this Planning Statement.

8.2.63 In addition to national planning policy, there are various guidance documents relating to good design for infrastructure projects. The National Infrastructure Commission (NIC) (now replaced with the National Infrastructure Service Transformation Authority) released Design Principles for National Infrastructure (Ref-46) which include four pillars of good design: climate, people, place and value. In addition, the National Design Guide (Ref-47) (January 2021) sets out components of good design.

8.2.64 The Planning Inspectorate's NSIP Advice Page on Good Design (Ref-48) (last updated 16 April 2025) explains why good design is important, what success might look like and how it might be delivered in applications for NSIPs. This re-emphasises that good design is not primarily about how infrastructure looks (although aesthetics are important), but instead is about a holistic approach incorporating effective process, collaboration with stakeholders, understanding the context of the site, its environment and opportunities for social value, incorporating clear design principles, and explaining how the approach to design has evolved and the reason choices have been made.

8.2.65 The National Fire Chiefs Council also provides guidance on the design of BESS (Ref-49), including advice on design and siting, aimed at removing or reducing potential fire and safety risks.

8.2.66 In line with the above policy and guidance, the **Design Approach Document [APP-268]** sets out the Applicant's design vision for the Scheme, as well as its evolution since inception to DCO Application submission. It has been prepared in accordance with the Planning Inspectorate's NSIP Advice Page on Good Design (2025) (Ref-48) and clearly sets out the design decisions taken at each step of the Scheme's development, and the rationale for these decisions, as well as the mechanisms by which good design will be secured post consent. It explains how the project specific Design Principles have been embedded into Scheme and its design iterations to ensure that the design of the Scheme is sensitive to place (particularly in the context of the CNL), has minimal impacts on heritage assets, represents an efficient use of natural resources and has demonstrated good aesthetic appearance as far as possible, in accordance with paragraph 4.7.2 of NPS EN-1. Appendix C of the **Design Approach Document [APP-268]** sets out the Scheme's compliance with the specific guidance in the Planning Inspectorate's NSIP

Advice Page on Good Design (Ref-48). Further details of the design evolution for the Scheme, together with a discussion on alternative sites, design layouts and technologies, can be found in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**.

8.2.67 In addition to the project specific design principles, the design evolution of the Scheme has also been influenced by feedback received during Non-statutory and Statutory Consultation, technical feedback and through further surveys, desk-based analysis and environmental assessment, to ensure that the design of the Scheme is sensitive to its environment and the views of those who have an interest in the Scheme, in line with the above requirements of NPS EN1, EN-3,the Planning Inspectorate's NSIP Advice Page on Good Design (Ref-48), NIC's Design Principles for National Infrastructure (Ref-46), and the National Design Guide (Ref-47).

8.2.68 The proposals for the BESS Area align with the NFCC guidance referenced above (Ref-49), such as the incorporation of fire water containment measures, provision of fire water, and other measures outlined in the **Outline Battery Safety Management Plan (BSMP) [REP3-106]**. The Applicant has consulted with Dorset & Wiltshire Fire and Rescue Service during pre-application and Statutory Consultation to inform the design of the BESS Area and engagement will continue across the project lifecycle.

8.2.69 The **Design Approach Document [APP-268]** sets out how good design measures are secured for the Scheme, including through Requirements in Schedule 2 of the **Draft DCO [REP6-005]** the **Works Plan [REP6-004],** and the various management plans including the **Outline LEMP [REP6-037]**, and the **Outline Ecological Protection and Mitigation Strategy [REP6-039]**.

8.2.70 In summary, the Scheme accords within the relevant policies in NPS EN-1 Part 4.7, the above policies in NPS EN-3 and EN-5, and the relevant national guidance on good design.

Climate Change Adaptation and Resilience

8.2.71 NPS EN-1 paragraph 4.10.1 acknowledges that whilst the country continues to accelerate efforts to end its contribution to climate change, the new energy infrastructure constructed must itself be resilient against the possible impacts of climate change so that it can satisfy the energy needs outlined in Part 3 of NPS EN-1.

8.2.72 In preparing measures to support climate change adaptation, applicants should take reasonable steps to maximise the use of nature-based solutions alongside other conventional techniques (NPS EN-1 paragraph 4.10.5). Nature based solutions can also result in biodiversity benefits and

net gain, as well as increasing absorption of carbon dioxide from the atmosphere (NPS EN-1 paragraph 4.10.7).

8.2.73 NPS EN-1 paragraph 4.10.8 confirms that applicants must consider the direct and indirect impacts of climate change when planning the location, design, build, operation and, where appropriate, decommissioning of new energy infrastructure. Assessments should be set out in the ES to cover various scenarios, in line with NPS EN-1 paragraphs 4.10.9 to 4.10.12.

8.2.74 In decision making, the Secretary of State should be satisfied that applicants have taken into account the potential impacts of climate change based on the guidance the latest UK Climate Projections and associated research and expert guidance available at the time the ES is prepared together with any later updates to the UK Climate Projections, or further scientific evidence, if deemed appropriate (NPS EN-1 paragraphs 4.10.13 to 4.10.15).

8.2.75 NPS EN-3 also contains solar-specific policy relating to climate change. NPS EN-1 paragraph 2.4.11 confirms that solar PV sites may be proposed in low lying exposed sites and for these proposals, applicants should consider, in particular, how plant will be resilient to increasing risk of flooding and the impact of higher temperatures.

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

8.2.77 As noted in **Section 5.2** above, both Wiltshire Council (Ref 10) and South Gloucestershire Council (Ref 11) have declared a climate emergency, with pledges to become carbon neutral by 2030.

8.2.78 **ES Volume 1, Chapter 7: Climate Change [REP5-022]** presents the findings of the assessment of potential climate change impacts as a result of the Scheme. In line with NPS EN-1, it considers direct and indirect impacts across the lifetime of the Scheme (constructions, operation and decommissioning). It includes a Climate Change Risk Assessment, which provides a description of how the Scheme will be affected by climate change impacts, taking into consideration the embedded mitigation measures that have been designed into the Scheme so that it will be more resilient to the impacts identified during the review of the UK Climate Projections 2018 (UKCP18) data.

8.2.79 **ES Volume 1, Chapter 7: Climate Change [REP5-022]** concludes that during the different stages of the Scheme (construction, operation and decommissioning), inevitable greenhouse gas (GHG) emissions will be

generated with associated products, transport, energy and fuel-use. However, the GHG assessment shows that the emissions generated during construction of the Scheme will be totally offset by the clean energy generated during the operational phase, and the Scheme itself will provide beneficial impacts through a net reduction in GHG emissions compared to a scenario without the Scheme where energy must be generated by the baseline grid means and without the capacity for energy storage. Therefore, overall, there are beneficial significant residual effects on climate change anticipated as a result of the Scheme.

8.2.80 During Issue Specific Hearing 1, the ExA questioned whether the GHG assessment would change if the Scheme was only operational for 40 years instead of the proposed 60 years. This is considered further at paragraph 8.3.17 of this Planning Statement.

8.2.81 The Scheme also incorporates embedded and additional mitigation to ensure it is resilient to climate change, in line with NPS EN-1 and NPS EN-3. In particular:

- The Scheme has been designed carefully to ensure it is resilient to flooding, including siting the most vulnerable elements are located in areas of lower flood risk, taking account of various climate change scenarios. Further detail on the mitigation proposed is provided in **Annex C: Sequential and Exception Test** accompanying this Planning Statement, **ES Volume 3, Appendix 11-2: Flood Risk Assessment [REP5-047]** and **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-013]**;
- The **Outline CEMP [REP6-029]**and **Outline Decommissioning Strategy [REP6-033]** contain measures to reduce waste, maximise reuse and recycling and reduce emissions from construction activities and transportation;
- The **Outline CEMP [REP6-029]** contains measures to ensure contractors monitor weather forecast and plan work to protect workers from extreme weather conditions; and
- The **Outline OEMP [REP6-031]** includes a commitment to embed resilience to projected increases in temperature by selecting inverters and BESS with an adequate cooling and ventilation system to control the temperature and enable efficient operation in warmer conditions.

8.2.82 In summary, the Scheme accords within the relevant policies in NPS EN-1 and NPS EN-3 in relation to climate change and there are anticipated beneficial significant residual effects on climate change as a result of the clean energy produced by the Scheme. On that basis, it is considered that

the Scheme's contribution to reducing the effects of climate change should be afforded substantial positive weight in the planning balance.

Network Connection

8.2.83 NPS EN-1 paragraph 4.11.1 acknowledges the importance of the availability of a grid connection for the construction of a generation plant. As set out at NPS EN-1 paragraph 4.11.5, the onus is on the applicant to secure the relevant grid connection. If applicants have not yet secured a connection, this should be set out in their application (NPS EN-1 paragraph 4.11.6).

8.2.84 Paragraph 4.11.4 of NPS EN-1 states the:

"Transmission network infrastructure, and related network reinforcement and upgrade works, associated with nationally significant low carbon infrastructure is considered as CNP Infrastructure."

8.2.85 In decision making, the Secretary of State should be satisfied that the appropriate network connection arrangements are/will be in place for a given project (NPS EN-1 paragraph 4.11.12).

8.2.86 NPS EN-3 provides further policy on network connection specific to solar schemes. NPS EN-3 paragraph 2.10.24 acknowledges that the connection voltage, availability of network capacity and the distance from the solar farm to the existing network can have a significant effect on the commercial feasibility of a development proposal. NPS EN-3 paragraph 2.10.25 continues that:

"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."

8.2.87 And NPS EN-3 paragraph 2.10.26 confirms that in such cases, applicants should assess the cumulative impacts of situating the solar farm in close proximity to other generating stations and infrastructure.

8.2.88 NPS EN-5 contains policy regarding strategic network planning. Paragraph 2.8.4 confirms that transmission owners (TOs) and Distribution Network Operators (DNOs) are required under **Section 9** of the Electricity Act 1989 to bring forward efficient and economical proposals in terms of network design. Paragraph 2.8.5 continues that TOs and DNOs are also required to facilitate competition in the generation and supply of electricity, and electricity distributors have a statutory duty to provide connection where requested.

8.2.89 The **Grid Connection Statement [APP-270]** confirms that the Applicant has secured a connection to the Existing National Grid Melksham

Substation and therefore the appropriate network arrangements are in place to satisfy NPS EN-1 paragraph 4.11.12.

8.2.90 The Order Limits include land within the Existing National Grid Melksham Substation to allow reinforcements and upgrades to the existing infrastructure which are required to connect the Scheme to the transmission network. The works involve the addition of new electrical infrastructure and associated civil works to comprise a new 400kV feeder bay to receive the Grid Connection Cables for the Scheme.

8.2.91 As set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** and accompanying **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the availability of a grid connection at the Existing National Grid Melksham Substation was a key consideration and starting point in the site selection for the Scheme. In its assessment of alternative available sites, the Applicant has considered sites closer to the Existing National Grid Melksham Substation, but none of the sites assessed were considered appropriate to accommodate the Scheme due to various constraints (see **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**). Further, the Applicant has considered alternative grid connections raised in responses to Non-statutory and Statutory Consultation, which are detailed in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**. However, the alternative put forward at the Minety Substation in Malmesbury does not have an available connection for the Scheme, and the alternative at the Rodden Road Substation in Frome does not offer sufficient capacity to accommodate the Scheme. Due to the distance between the Scheme and the Existing National Grid Melksham Substation, NPS EN-3 paragraph 2.10.26 is of less relevance in terms of the existing infrastructure situated around the point of connection, however, the Applicant has considered cumulative developments as part of its EIA as set out in **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-073]**.

Pollution Control and Other Environmental Regulatory Regimes

8.2.92 NPS EN-1 paragraph 4.12.1 provides that:

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

8.2.93 In decision making, the Secretary of State should not refuse consent on the basis of pollution impacts unless there is good reason to believe that

any relevant necessary operational pollution control permits or licences or other consents will not subsequently be granted (paragraph 4.12.16 of NPS EN-1).

8.2.94 The **Consents and Agreements Position Statement [APP-272]** details the additional consents and licences that are, or may be, required to construct and operate the Scheme. The **Outline CEMP [REP6-029]**, the **Outline OEMP [REP6-031]** and the **Outline Decommissioning Strategy [REP6-033]** provide the framework for management of environmental impacts at construction, operation and decommissioning. The measures contained within these documents is secured by Requirements in Schedule 2 of the **Draft DCO [REP6-005].**

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

Safety

8.2.96 NPS EN-1 paragraphs 4.13.5 to 4.13.7 confirm that applicants should consult with the Health and Safety Executive on matters relating to safety. Where the proposed development is subject to the Control of Major Accidents Hazards (COMAH) Regulations 2015, the applicant should also make early contact with the relevant Competent Authority, including providing a safety report to the Competent Authority if required. NPS EN-1 paragraph 4.13.8 confirms that in decision making, the Secretary of State should be satisfied that a safety assessment has been prepared, where required, and the Competent Authority has raised no concerns.

8.2.97 The COMAH Regulations do not apply to solar development and therefore the requirements of the COMAH Regulations (and the policy relating to them set out in NPS EN-1 paragraphs 4.13.6 and 4.13.7) have not been considered further in relation to the Scheme.

8.2.98 The Applicant has consulted the Health and Safety Executive on matters relating to safety (as required by NPS EN-1 paragraph 4.13.5) during Statutory Consultation. The HSE highlighted that the positioning of the Scheme is inside the zone of a major accident hazard high pressure gas pipeline (14 Feeder Wormington / Pucklechurch: HSE ref 7227, Transco ref 1497). The Applicant has assessed the pipeline as part of the EIA and the results are presented in **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072].** The **Outline CEMP [REP6-029]** and **Outline Decommissioning Strategy [REP6-033]** set out mitigation to prevent incidents regarding the pipeline including locating the Scheme outside of utilities protected zones, use of safe working practices and agreement of construction/demobilisation methods prior to works

commencing. All works will be undertaken in accordance with relevant health and safety legislation and guidance. The **Draft DCO [REP6-005]** includes protective provisions for the protection of electronic communication networks and utilities.

8.2.99 In addition to the above NPS policy requirements, Schedule 4, Paragraph 5(d) of the EIA Regulations requires that the EIA must provide a description of the likely significant effects of the development on the environment resulting from the:

"Risks to human health, cultural heritage or the environment (for example due to accidents or disasters)."

8.2.100 And Schedule 4, Paragraph 8 requires that the EIA provides:

"A description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters which are relevant to the project concerned."

8.2.101 **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072]** Section 20.7 sets out the assessment of the likely effects related to major accidents and disasters which are relevant to the Scheme, notably risks regarding: flooding; building failure, fire and associated explosions; air quality events; rail accidents; road accidents; aviation incidents; damage to/cut off of utilities; unstable ground conditions; and plant disease. The Scheme has been designed, as far as practicable, to avoid and reduce impacts and effects on major accidents and disasters, including measures such as siting vulnerable infrastructure away from areas at greater risk of flooding, and incorporating fire suppression into the design of the BESS containers. Mitigation measures have also been incorporated into how the Scheme will be constructed, operated and maintained and decommissioned to manage and minimise environmental effects, as set out in the **Outline CEMP [REP6-029]**; **Outline OEMP [REP6-031]**; **Outline Decommissioning Strategy [REP6-033]; Outline Battery Safety Management Plan (BSMP) [REP3-106]**; **Outline CTMP [REP6-041]**; and **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [REP4-021 – REP4-036 and REP3-063]**. These measures include, but are not limited to, minimising spills, applying relevant offsets from sensitive receptors and utilities, and preparation of relevant risk assessments prior to construction. The implementation of these plans will be secured via Requirements in Schedule 2 to the **Draft DCO [REP6-005]**.

8.2.102 Fire risk has been considered for the BESS element of the Scheme. The BESS containers proposed for the Scheme will have built in safety features for fire avoidance, detection and suppression and the Scheme

layout incorporates separation distances between battery containers to ensure an isolated fire would not become widespread and lead to a major incident. As per **ES Volume 2, Figure 3-1: Indicative Site Layout Plan [REP3-035]** the battery containers will be located more than 350 m from the nearest PRoW and more than 600 m from any residential receptors. An **Outline BSMP [REP3-106]** has been prepared for the Scheme, using the guidance provided by Dorset & Wiltshire Fire and Rescue Service and fully incorporating the recommendations of the National Fire Chiefs Council (NFCC), to ensure that any risks relating to batteries are properly mitigated. This will be updated and maintained as a 'live document' throughout the operational phase of the Scheme. The implementation of the strategy will be secured via Requirement 6 in Schedule 2 of the **Draft DCO [REP6-005]**.

8.2.103 It is considered that all Major Accident and Disaster risk events associated with the construction, operation and maintenance, and decommissioning phases of the Scheme can be appropriately mitigated through design, measures described in **ES Volume 1, Chapter 20: Other Environmental Matters [REP5-028]** and the application of management plans submitted as part of the DCO Application. No likely significant major accident and disaster effects are predicted to arise.

8.2.104 The Scheme is therefore considered to accord with NPS EN-1 in relation to safety, and it is considered that safety considerations should be afforded neutral weight in the planning balance.

Hazardous Substances

8.2.105 Paragraph 4.14.1 of NPS EN-1 states that:

"All establishments wishing to hold stocks of certain hazardous substances above a threshold need 'Hazardous Substances Consent."

8.2.106 As stated at **Section 6.5** of this Planning Statement, Regulation 6 of the Infrastructure Planning (Decisions) Regulations 2010 is a prescribed matter to which the Secretary of State will have regard in decision making. In addition to NPS EN-1, Regulation 6 contains considerations that should inform the Secretary of State's decision making in certain applications involving hazardous substances.

8.2.107 At Statutory Consultation, the Applicant confirmed to the HSE that Hazardous Substance Consent is not required for the Scheme because there are no in-scope hazardous substances as per Schedule 1 of The Planning (Hazardous Substances) Regulations 2015 on site. Therefore, Hazardous Substance Consent has not been considered further. Regulation 6 of the Infrastructure Planning (Decisions) Regulations 2010 is not applicable.

Common Law Nuisance and Statutory Nuisance

8.2.108 Paragraph 4.15.6 of NPS EN-1 states that:

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

8.2.109 The Applicant has prepared a **Statutory Nuisance Statement [APP-271]** as required by Regulation 5(2)(f) of the APFP Regulations which requires that an application for a DCO must be accompanied by:

"A statement setting out whether the proposal engages one or more of the matters in section 79(1) of the Environmental Protection Act 1990 (as amended) and if so how the applicant proposes to mitigate or limit them."

8.2.110 The relevant matters in section 79(1) that are engaged by the Scheme are: general site condition, air quality emissions, artificial light, and noise and vibration during construction, operation and maintenance, and decommissioning.

8.2.111 Mitigation measures are detailed within the **Outline CEMP [REP6-029]**, the **Outline OEMP [REP6-031]** and the **Outline Decommissioning Strategy [REP6-033]** which will prevent impacts from having the potential to result in statutory nuisance. The **Statutory Nuisance Statement [APP-271]** concludes that it is not expected that the construction, operation (and maintenance), and decommissioning of the Scheme would cause a statutory nuisance.

Security Considerations

8.2.112 NPS EN-1 paragraph 4.16.1 confirms that national security considerations apply across all national infrastructure sectors.

8.2.113 Where national security implications have been identified, the applicant should consult with the relevant security experts from the National Protective Security Authority (NPSA), the Office for Nuclear Regulation (ONR), and or the Department for Energy Security and Net Zero (DESNZ) to ensure security measures have been adequately considered in the design process and that adequate consideration has been given to the management of security risks (NPS EN-1 paragraph 4.16.6).

8.2.114 The Applicant has not identified any relevant considerations of national security in relation to the Scheme.

8.2.115 Regarding security more generally, NPS EN-1 paragraph 4.16.4 states that:

"Where possible, proportionate protective security measures should be designed into new infrastructure projects at an early stage in the project development."

8.2.116 Regarding solar specifically, NPS EN-3 paragraph 2.10.47 sets out that:

"Applicants should assess the visual impact of security measures, as well as the impacts on local residents, including for example issues relating to intrusion from CCTV and light pollution in the vicinity of the site."

8.2.117 NPS EN-3 paragraph 2.10.48 adds:

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

8.2.118 Security measures including fencing, CCTV and lighting are described in **ES Volume 1, Chapter 3: The Scheme [APP-055].** The visual impact of these works is assessed in **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]**.

8.2.119 In summary, the Scheme demonstrates compliance with NPS EN-1 paragraphs 4.16.6 and 4.16.4 and NPS EN-3 paragraphs 2.10.47 and 2.10.48.

8.3 Generic Impacts

8.3.1 This subsection considers the Scheme's compliance with planning policy requirements regarding the generic impacts that arise from energy infrastructure, as set out in the energy NPSs. As above, this section is not intended to list all relevant planning policy but instead focuses on the Scheme's general compliance with the main policies relevant to decision making. **Annex A: National Policy Accordance Tables** and **Annex B: Local Policy Accordance Tables**, appended to this Planning Statement, set out a more detailed analysis of the specific policies relevant to the Scheme and how the Scheme demonstrates compliance with them.

Air Quality and Emissions

Planning Policy Context

8.3.2 As set out in NPS EN-1 paragraph 5.2.1, energy infrastructure development can have adverse effects on air quality, which can lead to adverse impacts on health, protected species and habitats, or on the wider countryside and species.

8.3.3 Paragraphs 5.2.8 to 5.2.14 of NPS EN-1 set out how the applicant should assess effects on air quality, including how effects should be described in the ES and other environmental regulations and guidance that should be considered in the assessment. NPS EN-1 paragraph 5.2.12 confirms that

where a proposed development is likely to lead to a breach of any relevant statutory air quality limits, objectives or targets, the applicant should work with the relevant authorities to secure mitigation to ensure they are not breached.

8.3.4 Paragraphs 5.2.15 to 5.2.19 of NPS EN-1 set out the approach the Secretary of State should take in decision making. The Secretary of State should give air quality considerations substantial weight where a project would lead to a deterioration in air quality, for example if there is a breach of national air quality limits or statutory air quality objectives (in which case, consent should be refused). Even in cases where such limits and objectives are not breached, air quality will still be an important consideration where substantial changes in air quality are expected (NPS EN-1 paragraph 5.2.16). Paragraph 5.2.18 of NPS EN-1 confirms that where a project is proposed near to a sensitive receptor site for air quality, if the applicant cannot provide justification for this location, and a substantial mitigation plan, the Secretary of State should refuse consent.

8.3.5 Paragraph 5.7.1 of NPS EN-1 requires mitigation of impacts from a range of emissions, including dust, to be included, as they:

"Have the potential to have a detrimental effect on amenity or cause a common law nuisance or statutory nuisance."

8.3.6 Paragraph 5.7.5 of NPS EN-1 states the applicant should assess *"the potential for…dust impacts and the effect on amenity… as part of the ES"* and paragraph 5.7.6 of NPS EN-1 sets out the criteria to assess this. At a local level, Policy 55 of the Wiltshire Core Strategy (2015) provides that:

"Developments which are likely to exacerbate areas of poor air quality will need to demonstrate that measures can be taken to effectively mitigate emission levels in line with Wiltshire Air Quality Strategy (Ref-50) and Air Quality Action Plan (Ref-51)."

Assessment Conclusions

8.3.7 **ES Volume 1, Chapter 15: Air Quality [REP2-008]** identifies that there are number of air quality sensitive receptors in the vicinity of the Scheme. These include, inter alia, residential properties in Farleaze, Grittleton, Sevington, Chippenham, Corsham, Whitley, Gastard and schools in Shaw, Yatton Keynell and Hullavington. Some of these properties lie within one or more of the assessment Study Areas highlighted in Chapter 15, as presented in **ES Volume 2, Figure 15-1: Construction Dust Emissions Study Area [APP-162], Figure 15-3: Non-Road Mobile Machinery (NRMM) Emissions Study Area [APP-164] and Figure 15-5: BESS Fire Emissions Study Area, Receptors and Modelled BESS Locations [APP-166].**

8.3.8 **ES Volume 1, Chapter 15: Air Quality [REP2-008]** identifies that, prior to the implementation of any mitigation (embedded or additional) the Scheme has the potential to affect air quality due to dust, vehicle emissions, generator emissions and potential emissions associated with BESS fires. Embedded mitigation measures have been incorporated into the Scheme design to avoid and reduce impacts on air quality during construction, operation and maintenance and decommissioning. These are set out in the **Outline CEMP [REP6-029]** (including measures to control dust and vehicle emissions during construction); the **Outline CTMP [REP6-041]** (including measures to control construction traffic and worker vehicle numbers); the **Outline BSMP [REP3-106]** (including measures to deal with emissions in the event of fire); and the **Outline OEMP [REP6-031]** and **Outline Decommissioning Strategy [REP6-033]** (which both include the same air quality mitigation proposed in the Outline CEMP). Compliance with the final management plans, which will substantially accord with the outline management plans, is secured via Requirements in Schedule 2 of the **Draft DCO [REP6-005]**.

8.3.9 The assessment concludes that, with embedded mitigation, no likely significant effects are identified in relation to air quality as a result of the Scheme. No additional mitigation or monitoring is proposed.

Appraisal

8.3.10 The Applicant has assessed potential effects in relation to air quality in accordance with the assessment criteria set out in paragraphs 5.2.8 to 5.2.14 of NPS EN-1, including effects at the construction, operation and maintenance, and decommissioning phases of the Scheme and taking account of any significant emissions from any road traffic generated by the Scheme (NPS EN-1 paragraph 5.2.9).

8.3.11 Given there are no significant adverse effects on air quality anticipated, the Scheme will not lead to a deterioration in air quality and therefore is considered to comply with national and local planning policy. On that basis, it is considered that the Secretary of State should give neutral weight to effects on air quality in the planning balance.

Greenhouse Gas Emissions

Planning Policy Context

8.3.12 Paragraphs 5.3.4 to 5.3.7 of NPS EN-1 set out how the applicant should assess effects on GHG emissions including the requirement for the Applicant to produce a GHG assessment as part of their assessment which covers the whole life of the scheme and meets the requirements set out in NPS EN-1 paragraph 5.3.4. NPS EN-1 paragraph 5.3.7 requires applicants to produce a GHG Reduction Strategy, secured under the

DCO, which should consider the creation and preservation of carbon stores and sinks (e.g. through woodland creation and other nature-based enhancements).

8.3.13 In decision making, the Secretary of State must be satisfied that the applicant has as far as possible assessed the GHG emissions of all stages of the development (NPS EN-1 paragraph 5.3.8) and should be content that the applicant has taken *"all reasonable steps to reduce the GHG emissions of the construction and decommissioning stage of the development"* (NPS EN-1 paragraph 5.3.9). Paragraph 5.3.10 of NPS EN-1 continues that the Secretary of State should give:

"Appropriate weight to projects that embed nature-based or technological processes to mitigate or offset the emissions of construction and decommissioning within the proposed development. However, in light of the vital role energy infrastructure plays in the process of economy wide decarbonisation, the Secretary of State must accept that there are likely to be some residual emissions from construction and decommissioning of energy infrastructure."

8.3.14 As to operational emissions, NPS EN-1 paragraphs 5.3.11 and 5.3.12 confirm that operational GHG emissions are not reasons to prohibit the consenting of energy projects or to impose more restrictions on them in the planning policy framework than are set out in the energy NPSs, and the Secretary of State does not need to assess projects against operational carbon emissions and their contribution to carbon budgets, net zero and international climate commitments.

8.3.15 NPPF part 10 highlights the importance of integrating climate change considerations and net zero objectives into the planning system by supporting development and operation of energy infrastructure in ways which align with wider development, clean power and new zero objectives (including the delivery of clean power by 2030).. Policy W3 states that when determining applications for renewable and low carbon energy developments, local planning authorities should not require applicants to demonstrate the overall need for renewable or low carbon energy, and give substantial weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future.

Assessment Conclusions

8.3.16 The Applicant's GHG assessment is set out in **ES Volume 1, Chapter 7: Climate Change [REP5-023]**. The conclusion of the assessment is that, overall, the Scheme is likely to result in significant and beneficial residual effects for the whole Scheme lifecycle due to the clean energy produced

by the Scheme, which will provide a net reduction in GHG emissions compared to a scenario without the Scheme.

8.3.17 As set out at paragraph 8.2.81 above, during Issue Specific Hearing 1, the ExA questioned whether the GHG assessment would change if the Scheme was only operational for 40 years instead of the proposed 60 years. As confirmed in the **Written Summary of the Applicant's Oral Submissions and Responses at ISH1 [REP1A-012]**, For the purposes of assessment, the Applicant considers that assessing a 60-year operational period represents the reasonable worst case as it takes into account the GHG emissions during the maximum operational period which includes emissions associated with replacement activities. If a 40-year operational period were assessed instead then the calculations in **ES Volume 1, Chapter 7: Climate Change [APP-059]** would differ. In a 40-year scenario, the total GHG emissions are predicted to be lower as it is assumed that full replacement of the panels would not take place during the operational phase (total emissions estimated to be 736,869 tCO2e instead of 933,140 tCO2e). However, there would also be less renewable energy generated during the operational life of the Scheme and this would reduce the net saving over the Scheme's lifetime from 253,839 tCO2e to 14,256 tCO2e using the methodology set out in **ES Volume 1, Chapter 7: Climate Change [APP-059].** Further detailed sensitivity checks, including calculations to account for the maximum potential panels within the Scheme parameters and a 50% transport uplift, are provided in the Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 **[REP3-132]** submitted at Deadline 3.

Appraisal

8.3.18 In compliance with NPS EN-1, the Applicant's assessment in **ES Volume 1, Chapter 7: Climate Change [REP5-022]** covers the potential for GHG impacts for the construction, operation and decommissioning phases of the Scheme. Regarding the requirement in NPS EN-1 paragraph 5.3.7 to produce a GHG Reduction Strategy, the relevant measures are included within the **Outline CEMP [REP6-029]** and **Outline OEMP [REP6-031]**, rather than as a standalone document.

8.3.19 The GHG assessment concludes that the predicted GHG emissions for the construction phase (2027-2029) are 391,984 tCO_2e made up of emissions from products (BESS containers, solar PV panels and mounting structures, inverters, transformers, and cables), transportation of materials, worker transportation and delivery vehicles, waste, energy usage, packaging, concrete feet and water usage. GHG emissions from the construction of the Scheme are considered to have a minor adverse effect on the climate.

8.3.20 For the operation phase (2029 – 2089), GHG emissions will be generated thorough activities such as transportation of operational workers, water consumption, energy usage, and replacement and maintenance activities including associated replacement products, packaging and waste. Operational GHG emissions are expected to be 880,624 tCO_2e.

8.3.21 For the decommissioning phase (2089 – 2091), there is uncertainty over the total estimate of GHG emissions that will be produced and the available technology. However, GHG emissions are expected to be significantly lower than the construction phase. This is because the decommissioning activities do not require the extensive manufacturing, transportation, and installation of new equipment. The GHG emissions for the decommissioning phase are estimated to be 13,875 tCO2e based on emission produced from removal of products, worker transportation, waste, energy usage, and water usage.

8.3.22 In accordance with paragraphs 5.3.8 to 5.3.9 of NPS EN-1, the Applicant has sought to minimise GHG emissions where possible. Measures for reducing GHG impacts are included in the **Outline CEMP [REP6-029]**, the **Outline Site Waste Management Plan [REP1-102]**, and the **Outline OEMP [REP6-031]** and include measures such as:

- Measures to reduce waste through reuse of materials, use of prefabricated products and segregation of waste at source to facilitate recycling; and
- Reduction in vehicle emissions through good working practices (e.g. not allowing vehicles and plant to idle) and encouraging lower carbon forms of transport.

8.3.23 In addition, the Scheme incorporates nature-based solutions into its design. The rationale for all nature-based mitigation is set out in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010]**, with enhancements further detailed in the **Outline LEMP [REP6-037]**. Measures include substantial new hedgerow and tree planting, reinforcement planting at existing hedgerows and field boundaries, extensive grassland habitat creation and sympathetic management both within buffers and within the arrays, as well as discrete, valuable habitat creation (e.g. ponds and meadows) in appropriate locations.

8.3.24 **ES Volume 1, Chapter 7: Climate Change [REP5-022]** goes on to compare the likely GHG emissions from the operation and maintenance phase against the renewable energy likely to be generated from the Scheme, to assess the overall impact on the climate. The total energy generated by the Scheme would be around 25.07TWh and 31.75TWh over the 60-year Scheme lifespan for tracker and fixed panels respectively. Over the Scheme's lifespan, it is estimated the Scheme will

result in a net saving of 65,916 tCO2e if tracker panels are used or 266,507 tCO2e for fixed panels in comparison with a scenario whereby the Scheme does not come into effect and emissions from the grid in the baseline year of operation were used (with greater net savings when Well-To-Tank emissions are excluded). It is likely that a combination of tracker and fixed panels would be preferred and under such circumstances, the total emissions, and savings, would be within the ranges presented in the assessment in Chapter 7. It is considered that the overall GHG impact of the Scheme is beneficial and significant and will play a part in achieving the rate of transition required by nationally set policy commitments and supporting the trajectory towards net zero. The without-project baseline alternative would result in higher GHG emissions. The Applicant has also considered how its assessment would change if the Scheme was operational for 40 years instead of 60 years, which would still result in a net saving, albeit the saving is lower because there is a shorter period over which emissions from construction and materials are recouped.

8.3.25 NPS EN-1 paragraph 5.3.10 provides that the Secretary of State should give appropriate weight to projects that embed processes to mitigate or offset the emissions of construction and decommissioning within the proposed development. However, it is recognised that some residual emissions are likely and must be accepted by the Secretary of State in light of the vital role energy infrastructure plays in the process of economy wide decarbonisation. As set out above, the Scheme is expected to have minor adverse effects on the climate during the operation and decommissioning phases of the Scheme due to the likely GHG emissions created during those phases. These are reduced through embedded mitigation measures. However, overall, the Scheme is likely to result in significant and beneficial residual effects for the whole Scheme lifecycle due to the clean energy produced by the Scheme, which will provide a net reduction in GHG emissions compared to a scenario without the Scheme.

8.3.26 As a result, the Scheme demonstrates compliance with NPS EN-1 in relation to GHG emissions, which weighs in favour of granting development consent and it is considered that the Secretary of State should give substantial positive weight to GHG emissions in the planning balance.

Biodiversity and Geological Conservation

8.3.27 NPS EN-1 Part 5.4 sets out planning policy regarding biodiversity and geological conservation, covering policy relating to the Habitats Regulations, SSSIs, regional and local wildlife and geological sites, ancient trees and irreplaceable habitats, and the protection and enhancement of species. The Scheme's compliance with each topic has been appraised separately in this section.

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

8.3.29 At a local level, the Wiltshire Core Strategy contains policy regarding the preservation and enhancement of biodiversity. Core Policy 42 of the Wiltshire core Strategy requires proposals for standalone energy schemes to demonstrate how impacts on biodiversity have been assessed, and Core Policy 50 requires developments to show how effects have been avoided and mitigated to ensure no net loss of local biodiversity resource (with enhancements where possible).

Habitats Regulations

8.3.30 NPS EN-1 paragraph 5.4.4 acknowledges that a Habitats Regulations Assessment is required for certain sites, as set out in the Habitats Regulations, including Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). NPS EN-1 paragraphs 5.4.25 to 5.4.31 set out how HRAs should be dealt with in applicant's assessments, including details of the information applicants should present to help the Secretary of State determine if a HRA Appropriate Assessment is required. In decision making, NPS EN-1 paragraph 5.4.49 provides that the Secretary of State must consider whether the project is likely to have a significant effect on a protected site.

8.3.31 In compliance with the above policy, the Applicant has submitted a **Habitats Regulation Assessment Report [REP3-090]** which identifies SPAs, SACs and Ramsar sites (referred to as 'European sites') which could be affected by the Scheme. There are no European Sites within the Order Limits or within 10 km of the Solar PV Sites, but five sites were identified in the wider area, being the Bath and Bradford on Avon (BaBOA) Bats SAC, the Severn Estuary SAC, the Severn Estuary SPA, the Severn Estuary Ramsar, and the Salisbury Plain SPA. In accordance with the Planning Inspectorate's Scoping Response dated August 2024, the Salisbury Plain SPA was scoped out of the assessment on the basis that significant effects upon it are unlikely. The **Habitats Regulation Assessment Report [REP3-090]** includes a screening for likely significant effects which confirms that no likely significant effects are anticipated on the Severn Estuary SAC or Severn Estuary SPA. The remaining sites, Bath and Bradford on Avon (BaBOA) Bats SAC and Severn Estuary Ramsar, were carried forward to an Appropriate Assessment.

8.3.32 The **Habitats Regulation Assessment Report [REP3-090]** concludes that, with the adoption of mitigation measures, no adverse effects on the site integrity of the Bath and Bradford-on-Avon Bats SAC or the Severn Estuary Ramsar site are deemed likely, either in isolation or in combination with other projects.

8.3.33 Mitigation measures which are secured within the **Draft DCO [REP6-005]** for avoiding identified potential significant effects on the Bath and Bradford-on-Avon Bats SAC include the sensitive siting of Temporary Construction Compounds outside of Core Areas/Impact Zones, the narrowing of construction widths at field boundary habitats within the Cable Route Corridor to avoid fragmentation of habitat, control of lighting, and adequate mitigation for loss of potential bat roost sites to avoid killing/injury to individual bats and ensure no net loss of roost sites.

8.3.34 Mitigation measures which are secured within the **Draft DCO [REP6-005]** for avoiding significant effects on the Severn Estuary Ramsar include the adoption of trenchless techniques (e.g. HDD) for cable installation crossing watercourses likely to be used by qualifying fish species, and the burial of cables under watercourses to sufficient depths to minimise potential risks of EMFs impacts sensitive fish species.

8.3.35 On that basis, there are no likely significant effects on any protected European sites, and it is considered that the Habitats Regulations should be afforded neutral weight in the planning balance.

Sites of Special Scientific Interest (SSSI)

8.3.36 NPS EN-1 paragraph 5.4.8 provides that development on land within or outside an SSSI, and which is likely to have an adverse effect on it, should not normally be permitted except in certain circumstances. In decision making, the Secretary of State should use requirements to mitigate the harmful aspects of development and where possible, ensure conservation and enhancement of the SSSI (NPS EN-1 paragraph 5.4.50).

8.3.37 There are no SSSIs located on the land within the Order Limits. Two SSSIs are located within 5 km of the Solar PV Sites, being Harries Ground, Rodbourne SSSI, which is located immediately adjacent to Lime Down E and Sutton Lane Meadows SSSI, which is located 3.67 km south of Lime Down E. A further SSSI (Stanton St Quinton Motorway Cutting SSSI) is designated solely for its geological features and has been scoped out of assessment.

8.3.38 **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010]** includes an assessment of the likely significant effects on Harries Ground, Rodbourne SSSI and Sutton Lane Meadows SSSI.

8.3.39 The proximity of the Harries Ground, Rodbourne SSSI to Lime Down E makes it potentially susceptible to adverse impacts during the construction phase from the discharge of sediments, dusts and contaminants and through the potential loss of linked habitat within Lime Down E for the marsh fritillary butterflies which could affect the population within the SSSI. However, the assessment concludes that, with embedded mitigation such as control measures in the **Outline CEMP [REP6-029]** and **Outline Ecological Protection and Mitigation Strategy (EPMS) [REP6-039]**, no significant adverse effects are anticipated. During the operation and maintenance phase, impacts on the SSSI are likely to be negligible and the creation of habitats within the Solar PV Sites may compliment habitats and species supported by the SSSI.

8.3.40 No direct or indirect impacts on Sutton Lane Meadows SSSI are anticipated for the construction, operation or maintenance phases of the Scheme, given its distance from the Order Limits.

8.3.41 On that basis, the Scheme demonstrates compliance with NPS EN-1 paragraph 5.4.8 and it is considered that the likely adverse effects on SSSIs should be afforded neutral weight in the planning balance.

Regional and Local Sites

8.3.42 Sites of regional and local biodiversity and geological interest include Regionally Important Geological Sites, Local Nature Reserves (LNR) and Local Wildlife Sites. The Secretary of State should give due consideration to regional and local designations, but NPS EN-1 paragraph 5.4.52 makes clear that, given the need for new nationally significant infrastructure, these designations should not be used in themselves to refuse development consent.

8.3.43 The Order Limits do not contain any regional or local sites. There are two Local Nature Reserves within 5 km of the Scheme, being Corston Quarry and Pond LNR and Conygre Mead LNR, and a number of Local Wildlife Sites within 32 km of the Solar PV Sites. These have been assessed as reported in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010]** and, with implementation of embedded mitigation, no significant adverse effects are anticipated.

8.3.44 Further, enhancement measures have been identified to contribute to and strengthen the connectivity between a number of the Local Wildlife Sites located close to the Solar PV Sites and the local landscape. This will be achieved through the provision of new hedgerows, tree and woodland planting in the vicinity of the sites, and through the creation of areas of species rich grassland and scrub planting within the Solar PV Sites, which may provide ecological ‘stepping stones’ for various species within the local, largely arable landscape. These enhancement measures are

outlined in the **Outline LEMP [REP6-037]**, which is to be secured through Requirement 7 in the **Draft DCO [REP6-005].**

8.3.45 On that basis, the Scheme meets the policy test of NPS EN-1 and, given the enhancements proposed, it is considered that effects on regional and local sites should be afforded moderate positive weight in the planning balance.

Ancient Woodland, Ancient Trees, Veteran Trees and Other Irreplaceable Habitats

8.3.46 NPS EN-1 paragraph 5.4.32 provides that:

"Applicants should include measures to mitigate fully the direct and indirect effects of development on ancient woodland, ancient and veteran trees or other irreplaceable habitats during the construction and operational phases."

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

8.3.48 The relevant irreplaceable habitats in relation to the Scheme are ancient woodland, ancient trees and veteran trees. **ES Volume 1, Chapter 10: Arboriculture [APP-062]** reports the Applicant's assessment of likely significant effects on trees, based on a worst-case scenario of arboricultural impacts that could occur within the Order Limits.

8.3.49 Based on a desk-top study and a more in-depth tree survey, there are no ancient trees, and 52 veteran trees, within the Order Limits. Six parcels of ancient woodland are recorded outside of, but immediately adjoining or close to, sections of Lime Down C (Lords Wood and Surrendell Wood), Lime Down D (Bradfield Wood) and Lime Down E (North Bincombe Wood, Bincombe Wood and Seagry Wood).

8.3.50 Mitigation is proposed to avoid and reduce impacts on existing woodland features. The Scheme layout has been carefully designed to avoid veteran trees and embedded mitigation has been included such as tree buffer zones to avoid soil disturbance, micrositing to avoid root and canopy impacts, and demarcation fencing.

8.3.51 No direct loss of category A trees or veteran trees will occur within the Solar PV Sites, with likely removals limited to category B and C trees/tree groups. Some tree removals may be required in the Cable Route Corridor, but this will preferentially target trees of lower quality and no ancient or veteran trees will be removed from the Cable Route Corridor.

8.3.52 With embedded mitigation, no residual significant adverse effects are anticipated in relation to ancient and veteran trees (with only neutral and non-significant impacts anticipated in the Cable Route Corridor).

8.3.53 Residual significant adverse effects are anticipated in relation to the following:

- Residual moderate adverse effects on category B trees in the Cable Route Corridor as a result of potential removals after the application of micro-siting. However, a precautionary approach to assessment has been adopted and it is likely that the majority of the trees assessed as experiencing residual moderate adverse effects will not require removal due to the implementation of micro-siting to avoid them; and
- Moderate adverse residual effects on category A trees along the Cable Route Corridor as a result of potential root protection area incursions and pruning. However, as above, a precautionary approach to assessment has been adopted and it is likely that the majority of the trees assessed as experiencing residual moderate adverse effects will be fully protected through implementation of appropriate construction measures as outlined in **ES Volume 3, Appendix 10-1 Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206]**.

8.3.54 Further, significant tree and woodland planting is proposed within the Solar PV Sites as outlined in the **Outline LEMP [REP6-037],** which will result in the creation of 11.04 ha of new native broadleaved woodland within the Order Limits. Locations for planting have been directed by the need for landscaping and visual impact mitigation, but opportunities have also been taken to connect habitat parcels. Once established, this level of woodland planting will result in a significant beneficial effect on the extent of woodland within the Order Limits, which would, by extension, contribute to the connectivity of woodland stands and Green Infrastructure across the local landscape.

8.3.55 Woodland habitats are likely currently subject to spray drift from the use of pesticides and herbicides as part of intensive arable farming practices. The cessation of these processes is likely to benefit the woodland habitat edges during the life span of the Scheme, encouraging woodland ground flora.

8.3.56 **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010]** presents the conclusions on the likely significant effects on woodland in the wider context of ecological effects of the Scheme. It concludes that proposed woodland and tree planting, in combination with the cessation of intensive arable farming practices adjacent to the woodland identified

within the Solar PV Sites, would likely constitute a significant long-term beneficial effect to ecology at the local level.

8.3.57 In summary, the Scheme complies with NPS EN-1 paragraph 5.4.32 by protecting ancient and veteran trees, ancient woodland and other irreplaceable habitats. Some residual significant adverse effects are anticipated in relation to category A and B trees along the Cable Route Corridor, albeit these are not ancient, veteran or other irreplaceable habitats, and it is likely that the majority of the category A and B trees identified will be fully protected through appropriate mitigation such as micro-siting and other appropriate construction methods. Further, the Scheme offers an opportunity to provide substantial improvements to existing woodland through further tree planting and the integration of habitats. Therefore, in recognition of the potential loss of some category A and B trees, and the opportunities for replacement and enhancement, it is considered that impacts on woodland should be afforded neutral weight overall in the planning balance.

Protection and Enhancement of Habitats and Species

8.3.58 As set out in NPS EN-1 paragraph 5.4.16, many individual species receive statutory protection under a range of legislative provisions, and other species and habitats have been identified as being of principal importance for the conservation of biodiversity. NPS EN-1 paragraph 5.4.34 provides 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.

8.3.59 In decision making, the Secretary of State should ensure that species and habitats identified as being of importance for the conservation of biodiversity are protected from the adverse effects of development (NPS EN-1 paragraph 5.4.54). NPS EN-1 paragraph 5.4.55 provides that:

"The Secretary of State should refuse consent where harm to a protected species and relevant habitat would result, unless there is an overriding public interest and other relevant legal tests are met. In this context the Secretary of State should give substantial weight to any such harm to the detriment of biodiversity features of national or regional importance or the climate resilience and the capacity of habitats to store carbon, which they consider may result from a proposed development."

8.3.60 Impacts of the Scheme on relevant habitats and species have been considered as reported in **ES Volume 1, Chapter 9: Ecology and**

Biodiversity [REP4-010]. This includes a number of habitats such as grassland, hedgerows, woodland and watercourses, and the following species: badgers**,** bats, dormice, beavers, otters, water voles, brown hares, harvest mice, hedgehogs, polecat, deer, reptiles, amphibians, breeding birds, overwintering birds, terrestrial invertebrates, white-clawed crayfish, freshwater fish, plants, and invasive and non-native species.

8.3.61 Regarding embedded mitigation, the Scheme has been designed to retain the most valuable habitats and protect these with undeveloped buffer zones. The selection of access locations has been carefully considered to utilise existing field entrances and gaps in hedgerows wherever possible. Internal access tracks have been sited to avoid ecological buffer zones wherever possible. In the Cable Route Corridor, HDD will be implemented for selected Avoidance Areas to minimise effects on particularly sensitive features. Temporary construction compounds in the Cable Route Corridor have also been sited sensitively to avoid impact zones for bat species. Measures to protect ecological features are set out in the **Outline Ecological Protection and Mitigation Strategy (Outline EPMS) [REP6-039]**, the **Outline LEMP [REP6-037]**, the **Outline CEMP [REP6-029],** the **Outline OEMP [REP6-031]** and the **Outline Decommissioning Strategy [REP6-033]** to be secured by Requirements in the **Draft DCO [REP6-005]**.

8.3.62 With embedded and additional mitigation as summarised in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010],** residual significant adverse effects are anticipated to be neutral and non-significant except in the case of:

- Hedgerows within the Cable Route Corridor, where it is anticipated there will be temporary loss of habitat. However, the residual significant adverse effect is short term in nature and limited to a local level; and
- Breeding birds – ground nesting birds of open habitats, where it anticipated there will be displacement of ‘breeding birds - ground nesting birds of open habitats’ from the Solar PV Sites. This is assessed to result in a residual significant adverse effect at local level for skylark, and a residual significant adverse effect at site level for yellow wagtail, corn bunting, grey partridge and quail.

8.3.63 Whilst residual adverse significant effects are anticipated in relation to the above two receptors, the effects are localised and not regional or national. Further, the Scheme incorporates a number of enhancements to improve upon the current environment, resulting in a number of significant beneficial effects. These are set out in further detail in Table 9-13 of **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010]** and include (but are not limited to):

- Overall significant beneficial effects at local level on grassland and various species as a result of the reversion of the arable fields which currently dominate the Solar PV Sites to grassland for the lifetime of the Scheme;
- Significant long term beneficial effects at local level relation to hedgerow and woodland habitats (as discussed in the previous section), as a result of the proposed hedgerow, woodland and tree planting outlined in the **Outline LEMP [REP6-037]**;
- A significant beneficial effect at site-to-local level on the extent of standing water habitat as a result of the creation of new ponds. Details of the proposed ponds are set out in **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [REP6-009]** and measures for their creation are set out in the **Outline LEMP [REP6-037]**; and
- A significant beneficial effect at site level on the quality of the local ditch and watercourse network.

8.3.64 As a result of additional and embedded mitigation and enhancement measures, residual significant beneficial effects as a result of the Scheme are anticipated in relation to the following ecological features: other neutral grassland; woodland; ponds; hedgerows and lines of trees; ditches and watercourses; badgers; foraging/commuting bats; dormice; brown hare; harvest mouse, hedgehog and polecat; amphibians; reptiles; breeding birds – other species; overwintering birds and terrestrial invertebrates.

8.3.65 In summary, the Scheme is likely to result in residual adverse significant effects in relation to hedgerows in the Cable Route Corridor at a local level in the short term, becoming neutral and not significant in the medium to long term. On 'breeding birds - ground nesting birds of open habitat' at the Solar PV Sites, significant adverse effects are also identified at a local and site level. However, the residual significant adverse effects are far outweighed by the residual significant beneficial effects anticipated in relation to habitats and other species. On that basis, it is considered that effects on habitat and species should be afforded moderate positive weight in the planning balance.

Decisions Regulations

8.3.66 In addition to the above provisions of NPS EN-1, regulation 7 of the Infrastructure Planning (Decisions) Regulations 2010 provides that:

"When deciding an application for development consent the Secretary of State must have regard to the United Nations Environmental Programme Convention on Biological Diversity of 1992."

8.3.67 Regulation 7 principally relates to sustainable development. This Planning Statement demonstrates how sustainable development has been achieved through the outcomes of the EIA, through good design and delivery of economic benefits. It is therefore considered the Decisions Regulations do not materially alter Secretary of State decision making in relation to the Scheme.

Summary of Biodiversity and Geological Conservation

8.3.68 In summary, it is demonstrated that the majority of adverse effects on biodiversity as a result of the Scheme are avoided through the careful use of embedded (including overall Scheme design) and additional mitigation. Whilst two residual significant adverse effects are identified in relation to hedgerows and 'breeding birds - ground nesting birds of open habitat', the effects are localised and the Scheme also delivers ecological enhancements in accordance with national and local policy. On that basis, it is considered that the overall effects on Biodiversity and Geological conservation should be given moderate positive weight in the planning balance.

Civil and Military Aviation and Defence Interests

Planning Policy Context

8.3.69 NPS EN-1 part 5.5 sets out the potential impacts that energy infrastructure can have on civil, military aviation and defence interests including on communications, navigations and surveillance (CNS) infrastructure. NPS EN-1 paragraph 5.5.37 provides that:

"Where a proposed development may affect the performance of civil or military CNS, meteorological radars and/or other defence assets, an assessment of potential effects should be set out in the ES."

8.3.70 When preparing its assessment, the applicant should consult with the Ministry of Defence, Met Office, Civil Aviation Authority (CAA), National Air Traffic Services (NATS) and any aerodrome likely to be affected by the proposed development (NPS EN-1 paragraph 5.5.39).

8.3.71 NPS EN-1 paragraph 5.5.41 provides that, where development is proposed near to an aerodrome, the applicant should consider the increased risk of bird strike. This is because birds and wildlife may be attracted to the proposed development due to habitat creation or increased perching/roosting opportunities created by the infrastructure, which can in turn increase the risk of birds being struck by aircraft using the nearby aerodrome.

8.3.72 NPS EN-5 paragraph 2.11.14 provides that:

"In order to avoid unacceptable adverse impacts of electro-magnetic fields (EMF) from electricity network infrastructure on aviation, the Secretary of State will take account of statutory technical safeguarding zones defined in accordance with Planning Circular 01/03, or any successor, when considering recommendations for DCO applications."

8.3.73 NPS EN-5 paragraph 2.11.13 provides that undergrounding of a line would reduce the levels of EMFs experienced, but high magnetic field levels may still occur immediately above the cable.

Assessment Conclusions

8.3.74 The Applicant's glint and glare assessment set out in **ES Volume 1, Chapter 20: Other Environmental Matters [REP5-028]** concludes that there are no anticipated significant effects on aviation assets.

Appraisal

8.3.75 Aviation assets near to the Scheme are: Hullavington Airfield, approximately 1.1 km west (which is understood to not be operational as flying activities ceased in 2016); Badminton Airfield approximately 4.6 km west, Langley House Airfield, approximately 5.2 km south; Charlton Park Airfield, approximately 5.8 km northeast; and Bowldown Farm Airfield, approximately 7 km northwest. The Applicant has carried out an assessment of potential effects on civil and military CNS in accordance with NPS EN-1 and no significant effects are anticipated on nearby aviation assets in relation to glint and glare.

8.3.76 In relation to the potential for bird strike, as shown on **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [REP6-009]** the managed arable land and the grassland areas are well distributed throughout the Order Limits which helps to prevent bird flocks of a size that could pose an obstacle to aircraft, as well as ensuring the mitigation land is well integrated into its surroundings. Further, there are no large wetland areas being created where birds may congregate and then take flight together which could cause an issue for aircraft (the proposed ponds outlined on **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [REP6-009]** are not large enough for bird flocking). Therefore, there is no envisaged change to the risk of flocking birds to cause potential issues for aircraft and the assessment of potential glint and glare has found similarly there are no expected issues.

8.3.77 With regard to the effects of EMF on aviation, no overhead cables are proposed as part of the Scheme. **ES Volume 1, Chapter 20: Other Environmental Matters [REP5-028]** includes a summary of the Applicant's assessment of EMF to those receptors likely to be impacted by EMF. Given the Scheme's EMF emitting infrastructure is close to

ground level, or underground, levels of EMF experienced by potential aviation receptors have not been included in the assessment.

8.3.78 In summary, there are anticipated to be no glint and glare impacts to any civil, military aviation and defence interests and no envisaged increase in risk of bird strike. As a result, the Scheme is in accordance with NPS EN-1 in relation to civil, military aviation and defence interests, and should be afforded neutral weight in the planning balance.

Dust, Odour and Artificial Light

Planning Policy Context

8.3.79 NPS EN-1 paragraph 5.7.5 provides that:

"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."

8.3.80 In decision making, the Secretary of State should satisfy itself that an assessment of the potential detrimental impacts on amenity as a result of these factors has been carried out and that all reasonable steps have been taken, and will be taken, to minimise such detrimental impacts (NPS EN-1 paragraph 5.7.12).

Assessment Conclusions

8.3.81 The Applicant has assessed the likely impact of dust and other emissions (for instance, smoke and emissions from potential battery fires) as set out in **ES Volume 1, Chapter 15: Air Quality [REP2-008]**. The assessment conclusions are summarised above in the appraisal of air quality and emissions. No likely significant effects are identified in relation to air quality as a result of the Scheme.

8.3.82 **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** contains an assessment of likely impacts of artificial lighting. It confirms that lighting during the operational phase is limited to motion sensor security lighting within substations and the BESS Area, with no lighting required for the Solar PV Panels. Temporary site lighting during construction will be designed as far as reasonably practicable to minimise potential for light spill, particularly towards houses, traffic and ecological habitats. Standard good practice measures would be employed to minimise light spill, including glare during construction, operation and decommissioning. No likely significant effects are reported as a result of lighting.

Appraisal

8.3.83 In accordance with NPS EN-1 paragraph 5.7.5, the Applicant has assessed the potential impact of dust and emissions as a result of the Scheme and has implemented appropriate measures in the **Outline CEMP [REP6-029], Outline CTMP [REP6-041], Outline BSMP [REP3-106], Outline OEMP [REP6-031]** and **Outline Decommissioning Strategy [REP6-033]** (which both include the same air quality mitigation proposed in the Outline CEMP). Compliance with the final management plans, which will substantially accord with the outline management plans, is secured via Requirements in Schedule 2 of the **Draft DCO [REP6-005]**. As a result of such mitigation, no likely significant effects are identified in relation to air quality.

8.3.84 With regard to artificial light, the lighting proposed for operation of the Scheme is minimal, limited only to motion sensor security lighting at substations compounds and the BESS. Measures to control lighting during construction are set out in the **Outline CEMP [REP6-029]**, including measures to minimise lighting to that required for safe site operations, use of directional fittings to avoid light spill, and directing lighting into the Order Limits rather than towards the boundaries. The Applicant has prepared a **Statutory Nuisance Statement [APP-271]** which confirms that no nuisance is envisaged as a result of artificial light sources used by the Scheme.

8.3.85 The Scheme is not anticipated to cause any effects from insect infection, steam, other effluvia.

8.3.86 In summary, the Scheme demonstrates compliance with NPS EN-1 5.7.5 and 5.7.12 on the basis that no detrimental impacts on amenity are envisaged as a result of dust, odour and artificial light. It is therefore considered that dust, odour and artificial light should be afforded neutral weight in the planning balance.

Flood Risk

Planning Policy Context

8.3.87 NPS EN-1 Part 5.8 sets out the policy tests for assessing flood risk. NPS EN-1 paragraph 5.8.13 provides that a *"site specific flood risk assessment (FRA) should be provided for all energy projects in Flood Zones 2 and 3 in England"* involving *"sites of 1 hectare or more".* This assessment should identify and assess the risks from all sources of flooding to and from the project to demonstrate how these flood risks will be managed, taking climate change into account (NPS EN-1 paragraph 5.8.14).

8.3.88 NPS EN-1 paragraph 5.8.36 provides that in decision making, the Secretary of State should be satisfied that:

- The application is supported by an appropriate FRA;
- The Sequential Test has been applied and satisfied as part of site selection;
- A sequential approach has been applied at the site level to minimise flood risk;
- The proposal is in line with any relevant national and local flood risk management strategy;
- Sustainable Drainage Systems (SuDS) have been used unless there is clear evidence that their use would be inappropriate;
- In flood risk areas, the project is designed and constructed to be safe and operational in its lifetime, without increasing flood risk elsewhere;
- The project includes safe access and escape routes where required, as part of an agreed emergency plan, and that any residual risk can be safely managed over the lifetime of the development; and
- Land that is likely to be needed for present or future flood risk management infrastructure has been appropriately safeguarded from development.

8.3.89 NPS EN-3 contains solar-specific policy in relation to flooding. This includes NPS EN-3 paragraph 2.10.84 which re-emphasises the requirement to produce a FRA and drainage strategy as part of the ES and goes on to state that:

"As solar PV panels will drain to the existing ground, the impact will not, in general, be significant."

8.3.90 As set out in NPS EN-1 paragraph 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 of 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. Applicants are required to apply the Sequential Test, which ensures that:

8.3.91 *"A sequential, risk-based approach is followed to steer new development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account. Where it is not possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites with medium risk areas and then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas."* (NPS EN-1 paragraph 5.8.21).

8.3.92 NPS EN-1 paragraph 5.8.9 provides that 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 set out in NPS EN-1 paragraph 5.8.11, 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.

8.3.93 Annex F, Table 2 of the NPPF classifies the flood risk vulnerability of various land uses. Solar Schemes are specifically identified and classified as *"Essential Infrastructure"*, which means that they are generally considered as appropriate development within Flood Zones 1 and 2 and, provided the Exception Test is satisfied, within Flood Zone 3.

8.3.94 At a local level, Core Policy 67 of the Wiltshire Core Strategy deals with flood risk and require the Sequential Test to be applied in line with national policy requirements.

Assessment Conclusions

8.3.95 The Flood Risk Assessment (FRA) and Drainage Strategy is included at **ES Volume 3, Appendices 11-1 to 11-9 [REP4-021 – REP4-036 and REP3-063]**. It concludes that flood risk from all sources to the Scheme is negligible to low and embedded mitigation has been incorporated into the Scheme design to increase its flood resilience, such as siting critical infrastructure in Flood Zone 1, where there is less risk of flooding, and incorporating a minimum 8m buffer between infrastructure and all Main Rivers and Ordinary Watercourses. Full details of the embedded mitigation are contained within **ES Volume 3, Appendices 11-1 to 11-9 [REP4-021 – REP4-036 and REP3-063]**. Further, the Scheme is not anticipated to increase the risk of flooding elsewhere, because:

- The design of the Solar PV Panels and mounting structures will allow flood water to flow freely underneath. Potential for erosion where water drips from the Solar PV Panels is mitigated by the grassland planting beneath the panels. Therefore, the Solar PV Panels are not expected to increase flooding elsewhere;
- Smaller electrical infrastructure associated with the Solar PV Panels will be sited on concrete pads, surrounded by gravel filled filter trenches, to replace the loss of natural infiltration caused by the concrete bases themselves;

- For the BESS Area at Lime Down D (which includes 132 kV and 400 kV substations and incorporates an impermeable area of 63,715 m²), a Drainage Strategy has been provided within **ES Volume 3, Appendix 11.6: Flood Risk Assessment and Drainage Strategy – Lime Down D [REP5-055]** to address the increase in hardstanding resulting from the facilities. For areas with increased hardstanding, the peak surface water discharge rate will be limited to the existing 1 in 2 year greenfield runoff rate with a 30% betterment provided. This is a significant betterment of surface water runoff rates generated during a 1 in 2 year storm event at these Sites, in line with NPS EN-1 and guidance received from Wiltshire Council Lead Local Flood Authority;
- Access tracks will be designed to be permeable, allowing surface water to percolate into the ground below;
- The Interconnecting Cables and Grid Connection Cables will be underground once constructed, and therefore will not increase the risk of flooding; and
- Temporary increases in the risk of flooding from the Scheme during construction have been addressed by embedded and additional mitigation.

8.3.96 **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012]** has been informed by the FRA and Drainage Strategy (see **ES Volume 3, Appendices 11-1 to 11-9 [REP4-021 – REP4-036 and REP3-063]**) and assesses the likely impacts and effects of the Scheme in relation to hydrology, flood risk and drainage for the whole lifecycle of the development. It concludes that with embedded and additional mitigation, in addition to the measures described in the **Outline CEMP [REP6-029]** and **Outline Decommissioning Strategy [REP6-033]**, no significant residual effects are anticipated. The two forms of additional mitigation proposed are intended to address the potential for the pollution of surface water runoff in the case of a battery fire, and to provide a temporary drainage system for the construction stage to address the temporary increase in impermeable construction areas such as around the substation and BESS Area.

Appraisal

8.3.97 The following paragraphs demonstrate how the Scheme meets the policy requirements of NPS EN-1 paragraph 5.8.36.

8.3.98 Whilst the Scheme is primarily located within Flood Zone 1, some areas are within Flood Zones 2 and 3. Therefore, the application is supported by site-specific FRAs at **ES Volume 3, Appendix 11-1: FRA and Drainage**

Strategy [REP4-021]. for each section of the Order Limits in compliance with NPS EN-1 paragraphs 5.8.13 and 5.8.36.

8.3.99 The Sequential Test has been applied and satisfied as part of site selection. This is described in **Annex C: Sequential and Exception Test** to this Planning Statement and demonstrates that priority has been given to areas of lower flood risk in the site selection assessment, with areas in Flood Zones 2 and 3 initially excluded from the search for alternative sites. None of the alternative sites at lower risk of flooding were assessed to be suitable for the Scheme and therefore further areas were explored within Flood Zones 2 and 3. The Scheme has been designed so that areas of more vulnerable infrastructure have been sited in areas of lower flood risk.

8.3.100 It is considered that the Scheme is aligned with the aims and intentions of the Wiltshire Local Flood Risk Management Strategy. However, whilst its aims are policy-led, it is noted that the strategy is focussed on the roles and responsibilities of stakeholders and consultees rather than specific policy requirements.

8.3.101 Sustainable Urban Drainage Systems (SuDS) have been incorporated into the Scheme to manage surface water flows and an overview of the proposed SuDS features and their maintenance is provided in the Flood Risk Assessment and Drainage Strategy at **ES Volume 3, Appendices 11-1 to 11-9 [REP4-021 – REP4-036 and REP3-063].** In summary, for areas siting Solar PV panels, water will freely drain through perimeter gaps around all the Solar PV panels and there will be minimal increase in impermeable area and the managed grassland beneath will reduce the risk of ground erosion as a result of water discharging from the solar PV panels at a higher velocity. Access tracks will be designed to be permeable to allow surface water to percolate to the ground below. Smaller electrical infrastructure will be surrounded by gravel filter trenches to limit the lateral flow of water away from the equipment and to replace the loss of natural infiltration caused by the concrete bases themselves.

8.3.102 As set out above, a Drainage Strategy has been provided for the BESS Area at Lime Down D (which includes 132 kV and 400 kV substations), (**Appendix 11-6: Flood Risk Assessment and Drainage Strategy – Lime Down D [REP5-055])** to address the increase in hardstanding and provides significant betterment of surface water runoff rates in line with NPS EN-1 and guidance received from Wiltshire Council Lead Local Flood Authority. For construction, temporary measures to manage surface water runoff and potential soil compaction (which could lead to surface water flooding) are included in the **Outline CEMP [REP6-029]** and the **Outline Soil Resources Management Plan [REP6-035]**.

8.3.103 Due to the presence of flood risk areas within the Solar PV Sites, the Scheme has been designed and will be constructed to be safe and operational for its lifetime, without increasing flood risk elsewhere. The FRA and Drainage Strategy at **ES Volume 3, Appendices 11-1 to 11-9 [REP4-021 – REP4-036 and REP3-063]** confirm that the Scheme is not anticipated to increase the risk of flooding elsewhere and sets out the measures that have been incorporated into the Scheme to ensure it is safe for its lifetime. Further, on the basis that the Sequential Test confirmed there to be no reasonably available lower risk areas for the Solar PV Sites, the Exception Test has been applied and is set out in **Annex C: Sequential and Exception Test** to this Planning Statement. This demonstrates that the Scheme meets the Exception Test and sets out the substantial benefits that the Scheme would deliver in the event it is consented. This is also in compliance with NPS EN-1 5.8.42 (which allows the Secretary of State to grant consent where the Exception Test is met) and aligns with NPPF Annex F, Table 2, which defines solar infrastructure as Essential Infrastructure and permissible in Flood Zone 3 where the Exception Test can be demonstrated.

8.3.104 The Scheme includes safe access and escape routes where required, as part of an agreed emergency plan, and that any residual risk can be safely managed over the lifetime of the development. This is provided in the **Outline CEMP [REP6-029]** which requires that an emergency response plan will be developed in consultation with the relevant local authority emergency planning officer, emergency services including the local fire service, as well as the Environment Agency in relation to responding to flood warnings and events. The plan will detail the procedures for responding to incidents and emergencies on site, and any reporting.

8.3.105 Land that is likely to be needed for present or future flood risk management infrastructure has been appropriately safeguarded from development. Although land within the Order Limits is rural in nature and close to watercourses, none of the assessments or the consultation undertaken to date (including discussion with Wiltshire Council and the Environment Agency) have revealed the land to be needed for present or future flood risk management infrastructure.

8.3.106 In summary, the Scheme complies with the relevant policies in relation to flood risk and drainage. As a result, it is considered that flood risk and drainage should be given neutral weight in the planning balance.

Historic Environment

Planning Policy Context

8.3.107 NPS EN-1 Part 5.9 sets out the requirements of applicant assessment and the policy tests that inform decision making in relation to effects on

the historic environment. Applicants are required to assess likely significant heritage impacts as part of the ES, including an application of the mitigation hierarchy and consideration of possible impacts, including cumulative, on the wider historic environment. NPS EN-1 provides further details of what the Applicant should assess at paragraphs 5.9.9 to 5.9.21.

8.3.108 In decision making, the Secretary of State should seek to identify and assess the particular significance of any heritage asset that may be affected by the proposed development (either directly or through an effect on its setting, taking into account the relevant information in the application and the other information sources set out in NPS EN-1 paragraph 5.9.22.

8.3.109 NPS EN-1 paragraph 5.9.25 provides that the Secretary of State should consider:

"The desirability of sustaining and, where appropriate, enhancing the significant of heritage assets, the contribution of their settings and the positive contribution that their conservation can make to sustainable communities, including to their quality of life, their economic vitality, and to the public's enjoyment of these assets."

8.3.110 NPS EN-1 paragraph 5.9.27 provides that when considering the impact of a proposed development on a designated heritage asset, the Secretary of State should give great weight to the asset's conservation, and:

"The more important the asset, the greater the weight should be. This is irrespective of whether the potential harm amounts to substantial harm, total loss, or less than substantial harm to its significance."

8.3.111 NPS EN-1 paragraphs 5.9.28 to 5.9.30 provide guidance on the weighting that should be applied for each category of designated heritage asset, as summarised below:

- Any harm to or loss of significance of a designated heritage asset should require clear and convincing justification;
- Substantial harm to or loss of significance of a grade II Listed Building or a grade II Registered Park or Garden should be exceptional; and
- Substantial harm to or loss of significance of the assets of the highest significance, including Scheduled Monuments, Protected Wreck Sites; Registered Battlefields; Grade I and II* Listed Buildings; Grade I and II* Registered Parks and Gardens, and World Heritages Sites, should be wholly exceptional.

8.3.112 Where a proposed development will lead to substantial harm to or loss of significance of a designated heritage asset, the Secretary of State should

refuse consent unless the tests set out in NPS EN-1 paragraph 5.9.31 can be met (for instance, that the harm is outweighed by the substantial public benefits of the development).

8.3.113 Where the development will lead to *less than* substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate, securing its optimum viable use (NPS EN-1 paragraph 5.9.32).

8.3.114 For non-designated heritage assets, a balanced judgment will be required, having regard to the scale of harm or loss and the significance of the heritage asset (NPS EN-1 paragraph 5.9.33).

8.3.115 NPS EN-3 contains solar specific policy regarding impacts on heritage assets. NPS EN-3 paragraph 2.10.107 acknowledges that solar PV developments can have an effect on the historic environment, both above and below ground, and the subsequent paragraphs set out the assessments required to ensure impacts are adequately considered. NPS EN-3 paragraph 2.10.110 recognises that solar PV developments can also have a positive effect, for example, archaeological assets may be protected by a solar PV farm as the site is removed from regular ploughing.

8.3.116 NPS EN-3 paragraphs 2.10.137-2.10.138 provide that the ability to microsite specific elements of the development during construction should be an important consideration by the Secretary of State when assessing the risk of damage to archaeology (i.e. to avoid previously unknown archaeology when discovered).

8.3.117 NPS EN-3 paragraph 2.10.160 provides that, given the time limited nature of solar farms, the Secretary of State should consider the length of time for which consent is sought when considering the impacts of any indirect effect on the historic environment, such as the setting of designated heritage assets.

8.3.118 At a local level, Wiltshire Core Strategy policies adopt a similar significance-led approach to protection as outlined in NPS EN-1 (and reflected in the NPPF).

Other Relevant Legislation and/or Policy

8.3.119 Regulation 3 of the Infrastructure Planning (Decisions) Regulations 2010 provides as follows:

- When deciding an application which affects a listed building or its setting, the Secretary of State must have regard to the desirability

of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses;

- When deciding an application relating to a conservation area, the Secretary of State must have regard to the desirability of preserving or enhancing the character or appearance of that area; and
- When deciding an application for development consent which affects or is likely to affect a scheduled monument or its setting, the Secretary of State must have regard to the desirability of preserving the scheduled monument or its setting.

Assessment Conclusions

8.3.120 **ES Volume 1, Chapter 12: Cultural Heritage [REP3-017]** and its accompanying appendices sets out the assessment of the Scheme's impact on the historic environment, in line with the assessment criteria required by the NPSs and other relevant policy and legislation.

8.3.121 The impact on each asset, and the relevant embedded and additional mitigation measures are set out in full within **ES Volume 3, Appendix 12-8: Cultural Heritage Impact Assessment Tables [APP-232]**.

8.3.122 With embedded mitigation, no significant effects are anticipated in relation to conservation areas, registered parks and gardens, or scheduled monuments during each phase of the Scheme.

8.3.123 For Listed buildings, with embedded mitigation, no significant adverse effects are anticipated for each phase of the Scheme, although non-significant effects are expected in relation to some assets.

8.3.124 For non-designated heritage assets, with embedded mitigation, no significant adverse effects are anticipated for each phase of the Scheme.

8.3.125 Significant adverse effects, in the absence of additional mitigation, have been identified for 23 archaeological assets. However, following application of additional mitigation, the residual effect would be reduced to negligible, which is not significant.

8.3.126 The proposed embedded mitigation includes: design decisions to remove Solar PV Panels from various fields (or parts of them) within the Solar PV Sites as a result of heritage or archaeological sensitivities; the incorporation of enhanced visual screening through planting and distance offsets between the Scheme and heritage assets; and appropriate construction methods such as HDD in order to protect archaeological remains. Additional mitigation proposed includes an overarching Archaeological Mitigation Strategy, which details the additional mitigation during the construction phase of the Scheme (see **Volume 3, Appendix 12-6: Archaeological Mitigation Strategy [REP6-012]**).

8.3.127 There are areas of the Cable Route Corridor that have not been surveyed for archaeological assets. Within those areas, a worst-case scenario of a significant effect with a high magnitude of impact has been implemented. However, mitigation in the form of HDD or Strip, Map and Sample would reduce the residual effect to negligible, which is not significant. Where archaeological mitigation in the form of a programme of excavation and recording will occur or re-instatement of earthworks, it should be noted that physical impact will still occur to archaeological assets identified. However, the archaeological mitigation works proposed are considered sufficient to preserve the asset by record, and as such compensate for their loss.

Appraisal

8.3.128 In line with the requirements of NPS EN-1 paragraphs 5.9.9-5.9.10, the ES includes an assessment of the likely significant heritage impacts of the Scheme, explains how the mitigation hierarchy has been applied, and considers cumulative impacts of the Scheme.

8.3.129 Through sensitive design, the Applicant has taken care to avoid, reduce and mitigate impacts on heritage assets and their setting, in accordance with the mitigation hierarchy. Mitigation specific to each heritage asset is set out in **ES Volume 3, Appendix 12-8: Cultural Heritage Impact Assessment Tables [APP-232]** and includes:

- The removal of solar panels from fields close to heritage assets (such as close to Conservation Areas and various Listed Buildings);
- The inclusion of offsets between the Scheme's infrastructure and heritage assets to act as heritage buffers;
- Enhanced screening of existing hedgerows between the Scheme and identified heritage assets, such as between the Scheme and Rodbourne and between the Scheme and various Listed Buildings such as Norton Manor;
- Creation of new tree belts, for instance between the Scheme and Bradfield Manor Farmhouse and Surrendell Farmhouse;
- Routing construction traffic along routes to minimise impacts on conservation areas and various Listed Buildings such as Westlands Farmhouse; and
- Measures for in-situ preservation of archaeological assets.

8.3.130 **ES Volume 3, Appendix 12-8: Cultural Heritage Impact Assessment Tables [APP-232]** provides an assessment of the impacts to above-ground and below-ground assets as required by NPS EN-1 paragraph 5.9.11. The results of these assessments are set out in the conclusions of

ES Volume 1, Chapter 12: Cultural Heritage [REP3-017]. A full list of assets considered (including those scoped out of further assessment for the ES, because no harm to them is anticipated) is set out in **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]** and **ES Volume 3, Appendix 12-2: Archaeological Desk-Based Assessments [APP-220 and APP-221]**.

8.3.131 A summary of the effects on each category of heritage asset is set out below, including an appraisal against the policy requirements for each type of heritage asset as set out in NPS EN-1.

Designated Heritage Assets

8.3.132 There is no anticipated substantial harm to, or loss of, designated heritage assets as a result of the Scheme. Therefore, the policy tests regarding substantial harm set out in NPS EN-1 paragraphs 5.9.29 to 5.9.31 do not apply.

8.3.133 The Heritage Statement at **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]** identifies seven designated heritage assets where there is potential for *less than substantial harm* which is assessed at the lower end of the scale. These are Bradfield Manor Farmhouse, Barn to the East of Surrendell Farmhouse, Fosse Lodge, Surrendell Farmhouse, Widley's Farmhouse, Shelter Barn to the South East of Surrendell Farmhouse and New Barn at Widley's Farmhouse. However, these have been further assessed in **ES Volume 3, Appendix 12-8: Cultural Heritage Impact Assessment Tables [APP-232]** and with implementation of embedded mitigation measures, no significant adverse effects have been identified. Applying the balancing exercise between the harms and the potential benefits of the proposed development as set out in NPS EN-1 paragraph 5.9.32, the substantial public benefits and need for the Scheme, set out in **Section 5.3** of this Planning Statement, clearly and demonstrably outweigh the less than substantial harm to any of the identified designated heritage assets, which is on the lower end of the scale.

Non-designated Heritage Assets

8.3.134 It is not anticipated that the Scheme will lead to substantial harm to the significance of any non-designated heritage assets.

8.3.135 As with designated assets, **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]** does identify five non-designated heritage assets where there is potential for *less than substantial* harm which is assessed at the lower end of the scale. These are Outfarm East of Lords Wood Cottage, Lords Wood Cottage, Outfarm East-northeast of Widley's Farm, Otfarm North-northwest of Avil's Farm and Townleaze Barn. These have been further assessed the ES, as reported in **ES Volume 3, Appendix**

12-8: Cultural Heritage Impact Assessment Tables [APP-232] and with implementation of embedded mitigation measures, no significant effects have been identified. Applying the balancing exercise set out in NPS EN-1 paragraph 5.9.33, the scale of harm has been assessed at the lower end of the scale and no significant adverse effects are anticipated. Therefore, it is considered that the less than substantial harm identified should not weigh against consent in the planning balance.

Archaeological Assets

8.3.136 The Applicant has carried out desk-based assessments for the Solar PV Sites and Cable Route Corridor to assess archaeological assets in line with NPS EN-1 paragraph 5.9.11 and NPS EN-3 paragraph 2.10.113. These are reported in **ES Volume 3, Appendix 12-2: Archaeological Desk-Based Assessments [APP-220 and APP-221]** and conclude that there may be potential for the survival of buried remains dating to the pre-historic, Roman and medieval periods within specific areas of the Solar PV Sites and Cable Route Corridor that could be impacted by the Scheme. These have been further assessed in the ES, as reported in **ES Volume 3, Appendix 12-8: Cultural Heritage Impact Assessment Tables [APP-232]** and **ES Volume 1, Chapter 12: Cultural Heritage [REP3-017]** concludes that the Scheme would lead to significant adverse effects on 23 archaeological assets in the absence of additional mitigation. Additional mitigation has therefore been proposed, in the form of an overarching AMS (see **ES Volume 3, Appendix 12-6: Archaeological Mitigation Strategy [REP6-012]**) and measures in the **Outline CEMP [REP6-029]** which together provide a framework for protection and monitoring of archaeological assets during the construction phase and reduces the risk to negligible and not significant.

8.3.137 On that basis, the requirements of NPS EN-1 paragraphs 5.9.11 and NPS EN-3 paragraph 2.10.113 regarding archaeological assets have been met, and with the proposed mitigation, no harm is envisaged.

8.3.138 With regard to regulation 3 of the Infrastructure Planning (Decisions) Regulations 2010, the assessment of likely impacts on the historic environment have not revealed any residual significant effects on any listed buildings or their settings, or on conservation areas or scheduled monuments. On that basis, the duties imposed on the Secretary of State by regulation 3 can be discharged.

8.3.139 In summary, the Scheme complies with the relevant policies in relation to historic environment and no residual significant effects are anticipated. As a result, it is considered that historic environment should be given neutral weight in the planning balance.

Landscape and Visual Impact

Planning Policy Context

8.3.140 Section 5.10 of NPS EN-1 sets out the landscape and visual policy considerations for energy NSIPs. Paragraph 5.10.1 explains that:

"The landscape and visual effects of energy projects will vary on a case-by-case basis according to the type of development, its location and he landscape setting of the proposed development". Paragraph 5.10.4 continues that "landscape effects arise not only from the sensitivity of the landscape but also the nature and magnitude of change proposed by the development, whose specific siting and design make the assessment a case-by-case judgment."

8.3.141 NPS EN-1 paragraph 5.10.5 states that:

"Virtually all nationally significant energy infrastructure projects will have adverse effects on landscape, but there may also be beneficial landscape character impacts arising from mitigation."

8.3.142 NPS EN-1 Paragraph 5.10.6 confirms that:

"Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints, the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate."

8.3.143 NPS EN-1 Paragraphs 5.10.7 and 5.10.8 contain specific policies for projects located within designated landscapes including National Landscapes, or projects located outside of their boundaries, but which may have impacts within them. These designated landscapes are confirmed by government as having the highest status of protection in relation to landscape and natural beauty. NPS EN-1 paragraph 5.10.7 confirms that:

"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 the purposes of the designation are sufficient, appropriate and proportionate to the type and scale of the development."

8.3.144 Paragraphs 5.10.8 and 5.10.34 confirm that this duty to seek to further the purposes of nationally designated landscapes also applies when considering applications for projects outside of the boundaries of

designated landscapes but which may have impacts within them, and the same test outlined above applies in such cases.

8.3.145 For developments located within designated landscapes, NPS EN-1 paragraph 5.10.32 the Secretary of State must give substantial weight to the conservation and enhancement of the natural beauty of the national landscape and may only grant consent in these areas in exceptional circumstances. Paragraph 5.10.32 continues that "*such development should be demonstrated to be in the public interest and consideration of such applications should include an assessment of:*

- *The need for the development, include in terms of national considerations and the impact of consenting or not consenting it upon the local economy;*
- *The cost of, and scope for, developing all or part of the development elsewhere outside the designated area or meeting the need for it in some other way, taking account of the policy on alternatives set out in Section 4.3; and*
- *Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated."*

8.3.146 NPS EN-1 paragraph 5.10.33 provides that:

"For development proposals located within designated landscapes 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. The Secretary of State should ensure that any projects consented in these designated areas should be carried out to high environmental standards, including through the application of appropriate requirements where necessary."

8.3.147 Paragraphs 5.10.32 and 5.10.33 are considered further from paragraph 8.3.211 of this Planning Statement.

8.3.148 NPS EN-1 paragraph 5.10.12 refers to local landscapes that may be highly valued and states that where a local development document:

"Has policies based on landscape… 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."

8.3.149 With regard to visual effects, NPS EN-1 paragraph 5.10.13 acknowledges that:

"All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites."

8.3.150 Paragraph 5.10.14 provides that the Secretary of State:

"Will have to judge whether the visual effects on sensitive receptors such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the project."

8.3.151 NPS EN-3 paragraphs 2.10.42 to 2.10.44 seek to ensure that the design of new development allows the continued recreational use of public rights way, for schemes to minimise the visual outlook from existing public rights of way and for Applicant's to:

"consider and maximise opportunities to facilitate enhancements" to public rights of way and for "new opportunities for public access and cross proposed solar development sites." (paragraph 2.10.44)

8.3.152 NPS EN-3 paragraphs 2.10.94 and 2.10.95 recognise that solar farms by their nature located on low lying land will have a wider visual influence than other types of onshore energy infrastructure but that, subject to screening, potential visual impacts can be minimised.

8.3.153 NPS EN-3 paragraphs 2.10.96 to 2.10.97 confirm that *"landscape and visual impacts should be considered carefully"* including the *"potential impacts on the statutory purposes of nationally designated landscapes."*

8.3.154 NPS EN-3 paragraph 2.10.98 reaffirms the importance of good design, which includes *"minimising the landscape and visual impact"* of a scheme *"especially within nationally designated landscapes."*

8.3.155 Paragraph 2.10.99 of NPS EN-3 confirms the need to minimise the landscape and visual impact of security measures, including fencing.

8.3.156 NPS EN-3 paragraphs 2.10.100 and 101 explain that a Scheme should protect and retain existing vegetation, including its future growth and *"consider opportunities for individual trees within the boundaries to grow on to maturity"* and that the impact of the Scheme on existing trees and hedges should be informed by a tree survey.

8.3.157 NPS EN-3 paragraphs 2.10.131 to 133 sets out mitigation relating to landscape and visual impacts. This confirms that Applicant's should minimise the *"use and height of security fencing"* utilising existing landscape features to support site security and that the use of security lighting should be minimised and where it is used for this to incorporate passive infra-red technology to minimise landscape impacts.

8.3.158 NPS EN-3 paragraph 2.10.157 confirms how the Secretary of State will consider landscape and visual impacts with respect to solar farms,

including consideration of sensitive visual receptors, the effect of the development on landscape character and cumulative effects. Paragraph 2.10.15 also confirms the extra protection afforded to national landscapes confirming the need to comply with the policy tests set out in Section 5.10 of NPS EN-1.

Other Relevant Legislation and/or Policy

Section 85 Countryside Rights of Way Act

8.3.159 Section 85 of the Countryside Rights of Way Act 2000 (CROWA) was amended by section 245 of the Levelling up and Regeneration Act 2023 (Ref-57) places a duty to *"seek to further"* the purpose of conserving and enhancing the natural beauty of the National Landscape.

8.3.160 Natural England and the relevant local planning authorities as public bodies are required to enforce the powers of the CROWA. This includes consideration of the impact of development upon the conservation and enhancement of National Landscapes. In addition, the Secretary of State in determining the application for development consent has a duty to have regard to the statutory purposes of National Landscapes ensuring that the Scheme would seek to further the purposes of the CNL. This duty requires relevant authorities to be pro-active in their consideration of the impact of proposed development within or within the setting of National Landscapes and on their ability to conserve and enhance the statutory purpose and function of the National Landscape.

Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes

8.3.161 The Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes (Department for Environment, Food & Rural Affairs, December 2024) (Ref-59) sets out how the duty to seek to further the conservation and enhancement of Protected Landscapes[1] is to be complied with ensuring that the purposes for which Protected Landscapes are designated for is taken into account in decision making.

8.3.162 The duty is an active one requiring a relevant authority to *"explore measures which further the statutory purposes of Protected Landscapes."* In addition, relevant authorities should seek to:

[1] The definition of Protected Landscapes in the Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes (Department for Environment, Food & Rural Affairs, December 2024) includes National Parks, the Norfolk and Suffolk Broads and National Landscapes in England.

- Avoid harm and contribute to the conservation and enhancement of the natural beauty, special qualities, and key characteristics of Protected Landscapes, as far as reasonably practicable;
- Demonstrate with proportionate, reasoned, and documented evidence the measures to which consideration has been given when seeking to further the statutory purposes of Protected Landscapes; and
- Seek to further the purposes of the Protected Landscape when designing, *"where reasonably practical."*

8.3.163 The guidance sets out advice on the statutory purpose of Protected Landscapes. It confirms that the statutory purpose for National Landscapes with Conservation Boards, which is applicable to the CNL, are:

- *"Conserving and enhancing the natural beauty of the area of outstanding natural beauty"*; and
- *"Increasing the understanding and enjoyment by the public of the special qualities of the area of outstanding natural beauty."*

8.3.164 The guidance confirms that the duty also applies to the setting of Protected Landscapes acknowledging that the:

"Natural beauty, special qualities, and key characteristics can be highly dependent on the contribution provided by the setting of a Protected Landscape."

8.3.165 The guidance refers to matters such as long views from and into the Protected Landscape which *"may draw upon landscape character and quality of the setting."*

8.3.166 Further, the guidance clarifies that:

"Functional connectivity is also important where there are flows or close interconnection between the Protected Landscape and its setting."

8.3.167 This can include Public Rights of Way and recreational links joining the Protected Landscape and the non-designated area. The guidance confirms that development located in the setting of a Protected Landscape has:

"The potential to adversely affect the natural beauty, special qualities and key characteristics of a Protected Landscape."

8.3.168 The guidance explicitly states that the duty:

"does not prevent relevant authorities from undertaking their statutory functions and discharging their legal duties and other responsibilities. The duty is intended to complement these requirements by ensuring that the purposes for which Protected Landscapes are designated for are recognised in reaching decisions and undertaking activities that impact these areas. Consideration of what is reasonable and proportionate in the context of fulfilling the duty is decided by the relevant authority and should take account of the context of the specific function being exercised."

8.3.169 The Applicant's position is that the Secretary of State, when considering the application of the duty, must also comply with the legal obligation under s104(3) of the Planning Act 2008 to determine the DCO application in accordance with the relevant national policy statements. The Secretary of State must exercise judgment when determining whether the measures proposed as part of the Scheme to avoid and reduce impacts on the statutory purposes of the National Landscape are sufficient, appropriate, and proportionate and whether it would be sufficient, appropriate, and proportionate to require any further measures (NPS EN-1 paragraph 5.10.33). This includes consideration of: the scale, extent and significance of any harm to the CNL; the relevant planning policies including NPS EN-1 regarding minimising and mitigating landscape effects and Critical National Priority Infrastructure; and whether the development has been designed sensitively taking into account siting, engineering, operational and other relevant constraints.

Cotswold National Landscape Management Plan

8.3.170 **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** at paragraphs 8.3.66 to 8.3.67 sets out key measures and the special qualities of the Cotswolds National Landscape Management Plan 2025-2030. In addition, in response to the CNL Board's relevant representation, **Annex E** of this Planning Statement (added for Deadline 1) includes further consideration of the Scheme's compliance with the following:

- Cotswolds National Landscape Management Plan 2025-2030
- Cotswolds National Landscape Board Position Statement – Renewable Energy (2023)
- Cotswolds Conservation Board Position Statement – Development in the setting of the Cotswolds AONB (2016)
- Cotswolds Conservation Board Position Statement – Tranquillity (2019)
- Cotswolds Conservation Board Position Statement – Dark Skies and Artificial Light (2019)

- Cotswolds Conservation Board Position Statement – Woodland Creation and Tree Planting in the Cotswold AONB - Tree Species and Provenance (2023)

Assessment Conclusions

8.3.171 **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** presents an assessment of the Scheme's impact on the existing landscape character and its potential visual effects. **ES Volume 3, Appendix 8-1: LVIA Methodology [REP5-067]** includes a full detailed LVIA methodology, which has informed **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]**. This is in general accordance with the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition, 2013 (LVIA) (Ref-60).

Landscape Effects

8.3.172 With regard to the landscape effects of the Solar PV Sites, Table 8-17: Significant Landscape Effects of **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** confirms that there would be significant landscape effects upon the landscape fabric during construction or operation in Year 1. Once mitigation measures are established, significant beneficial effects would occur at operation in Year 15 and at decommissioning through enhancement to the landscape fabric. Embedded mitigation measures are designed to strengthen the existing landscape and include the reinforcement of existing hedgerows, the retention of existing woodland/scrub and hedgerow cover, new riparian planting and new planting, including new woodland, shelterbelts and grassland margins. The reinforced landscape would be established and mature at Year 15 and retained following decommissioning providing an overall benefit to the landscape character of the area creating a landscape fabric that would be in better condition than the existing baseline.

8.3.173 Table 8-17: Significant Landscape Effects of **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** also sets out that there will be significant adverse effects in the 1 km local study area during construction and in Year 1 of operation which is primarily related to the change in land use from agriculture to the Scheme. However, at Year 15 and decommissioning, the effect reduces to not significant. Further, following decommissioning, the site would benefit from the significantly enhanced legacy landscape, with tree and hedgerow planting that has matured to create a much stronger and robust landscape, retaining, and enhancing the overall character and providing considerable biodiversity benefits over the years. Due to the Scheme, the landscape would be left in a better condition than current day. This improvement is established as a

consequence of the landscape proposals resulting in greater species variety, greater age depth, enhanced structure, resilience to pest and disease and reinforcement of local landscape character across the Solar PV Sites, as well positive enhancements within the setting of the CNL.

8.3.174 With regard to the Cable Route Corridor, no significant landscape effects would occur within the Cable Route Corridor Study Area with all effects being short term and temporary in nature with cables placed underground.

Visual Effects

8.3.175 For the Solar PV Sites, **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** sets out that significant visual effects would be experienced by 9 private receptors during construction and at Year 1 Operation. These significant effects would fall away in Operation Year 15 and at decommissioning once landscaping has become established.

8.3.176 For public receptors (PRoW) during each phase of the Scheme, **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** (Table 8-20) concludes that during construction and at Operation Year 1, 27 public receptors would experience significant visual effects. As planting matures, at Operation – Year 15 and at decommissioning, significant effects would be reduced to 10 affected public receptors. Where significant long-term effects on public receptors remain at Year 15, this is primarily because mitigation is not proposed as it would not be appropriate to long-term landscape character and the legacy landscape. For example, where footpaths diagonally cross fields, new hedgerows to screen views of infrastructure would not be consistent with the regular pattern of fields which is characteristic of the existing landscape. Other instances of significant long-term visual effects on public receptors relate to the local topography where there are views from higher ground to infrastructure which cannot be fully alleviated by mitigation. In effect, the temporary harm is accepted in favour of the benefits of the long-term legacy landscape.

8.3.177 **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** confirms that during construction significant visual effects would occur to nine transport receptors, reducing to eight receptors during Year 1 of operation and no significant visual effects occurring during operation at Year 15 or during decommissioning.

8.3.178 In terms of visual effects in the Cable Route Corridor, significant effects would occur to six private receptors (Foscote RS022,Easton RS024, Westlands Farm RG064, Thingly RG087, Parkview Boyds Farm Gastard RI186, and Drumcovitt Bords Farm Gastard RI137) during construction and to seven public receptors (Bridleway and Footpath) as set out in Table 8-25 of **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]**.

These receptors are located close to the Cable Route Corridor and would experience a change in views and visual amenity. No significant visual effects within the Cable Route Corridor Study Area would occur during operation or decommissioning. These receptors are not located within the CNL.

8.3.179 In relation to cumulative visual effects **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** confirms no combined significant effects are anticipated on private receptors. Significant cumulative effects would occur to four public receptors and one transport receptor during construction and operation Year 1. These effects would be reduced at Year 15 Operation, although significant combined visual effects remain at two public receptors TP097.WT/SHER/16 (Lime Down A and C) and TP158.WT/HULL/8 (nearest Lime Down D and E) across all phases of the Scheme.

8.3.180 In terms of sequential effects, no sequential visibility would occur on major roads within the Scheme. A number of recreational routes pass through the Scheme utilising a combination of PRoW and Public Highway. Sequential effects for users of these recreational routes would not be any greater than those effects for individual sections as set out in **ES Volume 3, Appendix 8-3 ES LVIA Assessment Sheets [REP6-018 to REP6-021]**.

Effects of Abnormal Loads

8.3.181 Construction routes for Abnormal Indivisible Loads (AILS) would include road widening in the form of passing bays. **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** confirms that these works would relate to three small sections on the route to accommodate the cutting back or trimming of hedgerows. The works would not involve the removal of hedgerows and would not comprise a significant landscape impact. Table 8-26: Summary of Abnormal Indivisible Loads of **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** confirms the three locations and describes in full the works and landscape effect.

Effects on the Cotswold National Landscape

8.3.182 For ease in assessing the effects on the tranquillity of the CNL, the Tranquillity Technical Note **[PDA-010]** was submitted at Procedural Deadline A and summarises which parts of the Environmental Statement refer to relevant receptors within and/or adjacent to the CNL, the effects that are anticipated on these receptors and the mitigation measures proposed.

8.3.183 Parts of Lime Down A, B and C of the Scheme are within the setting of the CNL. **ES Volume 3, Appendix 8-6 LVIA Assessment of the Special Qualities of the Cotswold National Landscape [REP6B-006]** comprises

an assessment of the Scheme on the CNL and its special qualities. This includes consideration of the effects of the Scheme on surrounding landscape character and quality of the CNL and in visual terms assesses the effect of the development on views to and from the CNL.

8.3.184 Section 3 of **ES Volume 3, Appendix 8-6 LVIA Assessment of the Special Qualities of the Cotswold National Landscape [REP6B-006]** includes an assessment of effects on the 14 special qualities of the CNL. This includes consideration of other ES chapters where relevant and assesses how each special quality would be affected by the Scheme. The assessment considers visual effects on each special quality whilst having regard to landscape character.

Landscape Effects on the CNL

8.3.185 The significant landscape effect within the 1 km study area primarily relates to the change in land use from agriculture to a solar farm. This change does not directly affect the CNL as the buffer provided by avoidance measures and proposed mitigation planting would contain the development away from the edge of the CNL. The Scheme would be barely discernible from within the CNL with harm to the CNL being minimal with beneficial landscape effects within the setting of the CNL, which would further the purposes of the CNL.

Visual Effects on the CNL

8.3.186 There are two residential properties that have a visual relationship with the CNL (including views to and from) (Widley's Farm, Sherston (RI014) and Fosse Lodge (RI024), located in Grittleton. RI014 has a visual relationship with Lime Down A and RI024 with Lime Down C. Once embedded mitigation has established, at Year 15 the change would not be significant.

8.3.187 Footpath WT/NORT/1 (TP037) has a visual relationship with the CNL providing views to and from the CNL between the footpath and the CNL at its northern end. Whilst significant effects are identified during construction, there is no infrastructure proposed in field B12 closest to the CNL. Paragraph 8.10.128 of **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** confirms that there would be no change in views to and from the CNL from the footpath at its northern end confirming no significant effects on public receptors associated with the Scheme and the CNL.

8.3.188 There would be temporary significant construction effects upon two roads which have a visual relationship with the CNL (including views to and from the CNL). Once mitigation planting matures, there would be no significant long-term effects on the CNL.

Special Qualities of the CNL

8.3.189 **ES Volume 3, Appendix 8-6: Assessment of the Effects on the Cotswolds National Landscape and it's Special Qualities [REP6B-006]** provides an assessment of the Scheme on the CNL and its special qualities. Table 8-27 of **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** includes a summary of the effects of the Scheme on the relevant special qualities of the CNL confirming that there are no significant effects on the special qualities of the CNL as a result of the Scheme.

8.3.190 **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** sets out how the Scheme would 'seek to further' the purpose of the CNL and the mitigation measures are summarised in **ES Volume 3, Appendix 8-6: Assessment of the Effects on the Cotswolds National Landscape and it's Special Qualities [REP6B-006]**. Embedded mitigation measures include:

- Avoidance – avoiding infrastructure close to the CNL boundary where parts of Sites A, B and C are within its setting and to maintain views to and from the CNL such as Alderton and Sherston Church. In addition to the avoidance of infrastructure proposed at application submission, this includes the further removal of panels from the entirety of field A1 and field C9 following consultation with the Cotswold National Landscape Board during examination;
- Protection – Buffers and offsets have been embedded into the design of the Scheme to protect the existing landscape fabric of the Sites within the setting of the CNL (and throughout the wider Scheme);
- Retention and Enhancement - Retention and enhancement of the existing landscape framework to gap up existing hedgerows and provide new tree lines to increase age and species diversity. The embedded mitigation also includes new planting to both mitigate the visual effects of the Scheme and provide landscape benefits. This includes the re-establishment of historic hedgerows within the setting of the CNL, new areas of native woodland, trees, scrub and grassland, new planting within riparian corridors to enhance rivers and wetland, as well the restoration of dry-stone walls and creation of new ponds; and
- Positive Enhancements – Positive enhancements to further the purpose of the CNL are incorporated into the Scheme, particularly within avoidance areas. This includes:

- The creation of wildflower meadows on the edge of the CNL within the northern part of A1, C1, C6, C8, the southwestern part of C9 and B12;
- The creation of wildflower meadow verges on the edge of set aside land in A11, A12 and C10 to provide attractive buffers in views from public roads on the edge of the CNL; and
- Maintaining hedgerows at their current height of c1.5m (or as existing if greater) bordering the CNL within Site C (including the northern boundary of C1 to maintain open views of the landscape within the setting of the CNL.

8.3.191 As a result of the above mitigation, moderate significant beneficial effects on the landscape fabric are anticipated (as noted above), including within the setting of the CNL. The anticipated landscape effects within a 1 km Study Area (reported above) do not directly affect the CNL due to appropriate buffers, and the Scheme would be barely discernible from the CNL. As to visual effects, some short term significant adverse effects are anticipated during Construction and Operation Year 1 on some receptors which have a visual relationship with the CNL (including views to and from the CNL). However, once mitigation planting matures the magnitude of change would reduce and the effects at Year 15 would not be significant, with no effects identified during decommissioning. As such, there would be no significant long-term visual effects on the CNL.

8.3.192 It is recognised that it is not possible for the Scheme to further the purpose of some special qualities of the CNL, such Special Quality 10: Dark Skies, because not all special qualities are capable of having their understanding and enjoyment increased by the Scheme. However, the Scheme has been designed to ensure that no significant adverse effects on the CNL are anticipated and therefore those special qualities that cannot be furthered remain intact.

Summary of Residual Landscape and Visual Effects

8.3.193 **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** confirms there would be significant beneficial landscape effects at Year 15 and decommissioning. Significant adverse visual effects would remain during all phases to 10 public receptors (PRoW) as set out in Table 8-19 in **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]**.

Appraisal

8.3.194 As set out in the **Design Approach Document [APP-268]**, the Applicant has undertaken an iterative design process to ensure good design and to minimise the impacts of the Scheme. Design matters relating to landscape and visual elements has been informed by desk studies, detailed fieldwork

and having regard to feedback from consultation responses (as set out in Tables 8-1 and 8-2 of **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** and in the **Consultation Report [APP-022]**). These activities enabled an early understanding of the Site and its context with respect to landscape and visual matters.

8.3.195 The landscape and visual impact assessment has been produced in general accordance with the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition, 2013 (LVIA) and informed by published landscape character assessments and management plans. This included early consideration of the location of the Site partially within the setting of CNL and the application of the mitigation hierarchy to avoid and reduce impacts. This approach informed subsequent design iteration having regard to views in and out of the CNL. Early consideration was given to the special qualities of the CNL and the need for the scheme design to 'further the purpose' of the CNL informed by the Cotswold National Landscape Management Plan (Ref-61) and the Draft Wiltshire and Swindon Local Nature Recovery Strategy (March 2025) (Ref-62) as important and relevant documents. Compliance with the Cotswolds National Landscape Management Plan 2025-2030 and the relevant CNL position statements has been demonstrated, as set out in **Annex E** of this Planning Statement.

8.3.196 The iterative design process has minimised landscape and visual effects including having regard to the special qualities of the CNL and to 'further the purpose' of the CNL. This has included:

- The removal of panels within the setting of the CNL in Lime Down A, B and C where there is a strong relationship between the CNL and the Scheme;
- Incorporation of embedded mitigation into the Scheme design with respect to offsets and buffers;
- Inclusion of embedded landscape design parameters as set out **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]**;
- Enhancement measures to 'further the purpose' of the CNL; and
- Specific management regimes with respect to Lime Down A, B and C including wildflower meadow verges and maintaining hedgerows at their current height of approximately 1.5 m (or as existing if greater) bordering the CNL within Lime Down C.

8.3.197 In addition, **ES Volume 3, Appendix 8-6 LVIA Assessment of the Special Qualities of the Cotswold National Landscape [REP6-B-006]** identifies ecological, hydrological, lighting and recreational measures that further the purposes of the CNL including:

- Proposed calcareous grassland meadows that are appropriate to the underlying geology and the provision of approximately 119.7 ha of flower-rich neutral grassland;
- SuDS and embedded pollution prevention measures operate to prevent any change to water flows or quality entering CNL catchments;
- The minimal use of lighting to required safe site operations as set out in the **Outline CEMP [REP6-029]**. Lighting associated with the substations and BESS Area would not be perceptible form the CNL due to distance and directional shielding;
- In Lime Down A, fields A11 and A12 would remain in agricultural land but would be managed as set aside for Skylark mitigation. Wildflower margins along verges to public areas would provide an attractive area for recreation; and
- The provision of non-vehicular permissive paths on each of the Solar PV Sites, as shown on the **Works Plan [REP6-004]** (Work No.10).

8.3.198 These embedded mitigation and enhancement measures are incorporated into the Scheme as shown within **ES Volume 2, Chapter 3: The Scheme [APP-055]** and **Figure 3-4: Landscape and Ecology Mitigation Plan [REP6-009],** which forms part of the **Outline Landscape and Ecological Management Plan [EN010168/APP/7.18]**. Requirement 7 of the **Draft DCO [REP6-005]** requires the submission and approval of a landscape and ecological management plan to be substantially in accordance with the **Outline Landscape and Ecological Management Plan [REP6-037]** and for the landscape and ecological management plan to be implemented as approved. These measures and controls will ensure that the detailed design of the Scheme incorporates the landscape mitigation and enhancements included within the **Outline Landscape and Ecological Management Plan [REP6-037]**.

8.3.199 The above demonstrates compliance with paragraphs 5.10.6 of NPS EN-1 and paragraphs 2.10.94, 2.10.95, 2.10.96, 2.10.97 and 2.10.98 of NPS EN-3 illustrating a sensitive and careful approach to design that has sought to minimise landscape and visual impacts from the outset.

8.3.200 The iterative design process has also had particular consideration to the setting of the Site to and from the CNL to ensure that there would be no impact on its special qualities and that the Scheme would further its purpose. This demonstrates compliance with paragraphs 5.10.7, 5.10.8, and 5.10.34 of NPS EN-1 and paragraph 2.10.157 of NPS EN-3. The Scheme is also in accordance with Section 85 of the Countryside and Rights of Way Act 2000, Section 245 (Protected Landscapes) of the

Levelling-up and Regeneration Act 2023 (LURA 2023) and the Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes (Department for Environment, Food & Rural Affairs, December 2024). Compliance with NPS EN-1 paragraphs 5.10.32 and 5.10.33 is considered further at paragraph 8.3.211 of this Planning Statement.

8.3.201 Of particular note is that in terms of landscape effects, the Scheme would result in significant beneficial effects for the landscape fabric which are secured into the Scheme through Requirements in the **Draft DCO [REP6-005]**. This is in accordance with paragraph 5.10.5 of NPS EN-1, which recognises that there may be beneficial landscape effects from mitigation associated with solar development.

8.3.202 **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** sets out how landscape and visual impacts have been minimised as far as practicable. Through the application of good design principles including the application of the mitigation hierarchy, a robust approach to secure good design would be achieved. Despite this approach, some significant residual visual effects would remain to 10 public receptors as summarised above, where any additional mitigation measures would not accord with the long-term landscape character and legacy landscape. No adverse residual landscape and visual effects relate to those parts of the Site within the setting of the CNL.

8.3.203 It is acknowledged in NPS EN-1 paragraph 5.10.5 that virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape. Paragraphs 5.10.13 and 5.10.14 of NPS EN-1 and paragraph 2.10.157 of NPS EN-3 acknowledges that all proposed energy infrastructure is likely to have visual effects and that in decision making, the Secretary of State will have to judge whether the visual impact outweighs the benefits of the Scheme.

8.3.204 The Applicant has applied the mitigation hierarchy through the design of the Scheme, the Scheme includes significant landscape enhancements secured through the **Draft DCO [REP6-005]**, and all residual effects have been reduced as far as practicable.

8.3.205 The Scheme comprises critical national priority (CNP) infrastructure for which there is an urgent and critical need. Paragraph 4.2.15 of NPS EN-1 explains how CNP policy is to be applied where there are residual impacts. This confirms that residual impacts are *"unlikely to outweigh the urgent need"* for the Scheme in all but the most exceptional circumstances. The exceptional circumstances test required under 5.10.32 is considered from para 8.3.211 of this Planning Statement and for the reasons stated is considered to be met.

8.3.206 There is urgent need for the Scheme as confirmed by NPS EN-1 and substantial weight should be given to this in the planning balancing exercise. There is a presumption in favour of granting consent due to the Scheme being CNP infrastructure. The Scheme is in accordance with landscape policies set out in NPS EN-1 and EN-3 as set out in this chapter and expanded within the Planning Accordance Tables included in Annex A and Annex B of this Planning Statement. The Scheme has sought to minimise impacts through good design and it is therefore considered that the Scheme accords with paragraph 5.10.6 of NPS EN-1. In addition, the Scheme would also be in accordance with other important and relevant local landscape planning policy. This includes Core Policy 42: Standalone renewable energy installations, Core Policy 51: Landscape, Core Policy 52: Green Infrastructure, Core Policy 57: Ensuring high quality design and place shaping of the adopted Wiltshire Core Strategy and Policy 90: Woodland, Policy 91: Conserving and enhancing Wiltshire's landscapes and Policy 93: Green and blue infrastructure of the emerging draft Wiltshire Local Plan.

8.3.207 Overall, the Scheme accords with national and local landscape and visual amenity policies with the iterative design process having minimised impacts as far as possible. Whilst there are significant residual adverse visual impacts, these would not outweigh the substantial benefits associated with the Scheme, which includes significant landscape enhancements that would 'further the purpose' of the CNL.

8.3.208 Given the combination of significant beneficial landscape effects on the landscape fabric from Operation Year 15 and at decommissioning and significant adverse landscape effects in the Local Study Area (1 km) for construction and Operation Year 1 (reducing to non-significant in Operation Year 15 and at decommissioning), it is considered that the landscape effects of the Scheme should be afforded moderate negative weight in the planning balance.

8.3.209 With regard to visual effects, there are residual adverse visual effects for the lifetime of the Scheme, however, as explained above, this is primarily because mitigation in these areas is inappropriate as it would not accord with the long-term landscape character and legacy landscape. In effect, the temporary visual harm is accepted in favour of the benefits of the long-term legacy landscape. On that basis, it is considered that the visual effects of the Scheme should be afforded moderate negative weight in the planning balance.

8.3.210 Therefore, overall, it is considered that landscape and visual impacts should be afforded moderate negative weight in the planning balance.

Appraisal of the policy tests for development within and close to National Landscapes (NPS EN-1 paragraphs 5.10.32 and 5.10.33)

8.3.211 The vast majority of the Scheme is outside of the boundaries of the CNL. However, proposed construction vehicle routes for the Solar PV Sites pass through the CNL and four Highways Improvement Areas (2.16 ha) are located within the CNL where works are required to existing roads and junctions to make them suitable for construction traffic. This represents 0.17% of the total Scheme area. Alternative routes to avoid the CNL have been considered, but discounted, as set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** and the **Technical Note on Construction Routes in the Cotswolds National Landscape [REP1-131]**, as discussed further below**.** On this basis, the tests in NPS EN-1 paragraphs 5.10.32 and 5.10.33 (set out in paragraphs 8.3.145 and 8.3.146 of this Planning Statement) have been applied.

8.3.212 The Scheme is considered to meet the public interest test set out in NPS EN-1 paragraph 5.10.32 for the reasons set out in the following paragraphs.

The need for the development

8.3.213 The need for the Scheme is well established in policy and further details are set out in Section 5 of this Planning Statement and the **Statement of Need [REP1-085]**. Decarbonisation is a legally-binding climate change target for the UK and urgent actions are required to keep decarbonisation on track to limit global warming. NPS EN-1 establishes a critical national priority for the provision of nationally significant low-carbon infrastructure, which includes large-scale solar farms such as the Scheme, and a combination of many or all types of low-carbon infrastructure is urgently required for energy security and to meet the Government's 2050 net zero target. If consented, the Scheme would help the UK to meet its legally binding carbon emissions reduction targets, while enhancing national security of supply, and providing low-cost electricity to meet the increasing demand.

8.3.214 The Scheme will also have a positive impact on both the national and local economies. As set out in **ES Volume 1, Chapter 16: Socio-economics, Tourism and Recreation [APP-068]**, the Scheme is anticipated to result in some non-significant beneficial effects in relation to employment, increased local training opportunities and Gross Value Added (GVA). The Scheme is anticipated to create 268 Full Time Equivalent (FTE) jobs per annum with the on-site construction workforce expected to peak at approximately 692 employees during the construction phase. During operation, 15 permanent jobs would be generated. In a peak replacement scenario, 125 FTE are required and in the

decommissioning phase up to a gross of 214 FTE employees per annum are estimated. There is anticipated to be a reduction of up to 20 FTE jobs in the agricultural sector as a result of direct effects on farmers and indirect effects on suppliers. The Scheme's construction is also anticipated to have a negative impact on tourism spending locally, which is estimated could lead to the loss of approximately 50 FTE jobs in the worst-case scenario.

8.3.215 The net direct employment generated by the Scheme during construction is anticipated to induce an uplift of £15.7 million Gross Value Added (GVA) per annum within 20 km of the Scheme. The Scheme is anticipated to induce a further uplift of £10.2 million GVA per annum more generally within 20 km of the Scheme, through indirect and induced economic benefits associated with the Scheme's construction. During operation, the net direct employment generated by the Scheme is anticipated to create an uplift of £2.12 million GVA per annum, of which approximately £564,000 GVA per annum is anticipated to be generated within 20 km of the Scheme. A further uplift of £388,000 per annum is anticipated within 20 km of the Scheme as a result of indirect and induced economic benefits resulting from operation of the Scheme. During the peak replacement scenario, the net direct employment from the Scheme is anticipated to generate an uplift of £7.34 million GVA within 20 km of the Scheme, with an additional £2.13 million GVA elsewhere in the UK and indirect and induced economic benefits of £4.77 million per annum within 20 km of the Scheme. During decommissioning, the net direct employment generated is anticipated to induce an estimated uplift of £12.6 million GVA per annum within 20 km of the Scheme. As a result of decommissioning the Scheme, an uplift of £8.17 million per annum is anticipated as a result of indirect and induced economic benefits within 20 km of the Scheme. Therefore in total, accounting for the number of years at each phase, the Scheme is anticipated to generate an uplift of in excess of £161 million GVA (chained to 2023 value) within 20 km of the Scheme alone (with further benefits nationally).

8.3.216 In summary, the Scheme is considered to meet this limb of the test set out in NPS EN-1 paragraph 5.10.32 as there is a demonstrated need for the Scheme and the impacts of the Scheme on the national and local economy have been appropriately assessed, with some non-significant beneficial effects anticipated.

The cost of, and scope for, developing all or part of the Scheme elsewhere

8.3.217 As set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**, and **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185],** the Applicant has considered alternative

sites for the Scheme and has assessed various potential development areas within a 20 km radius to consider their suitability as alternative sites for the Scheme. The Applicant's assessment concludes that there are no more suitable and available locations within the 20 km search area than the proposed location for the Scheme, based on the criteria identified.

8.3.218 At a site level, the Applicant has also considered whether there is scope for construction routes to be outside of the CNL. This would avoid the need for the Highways Improvement Areas within the CNL and mean that no part of the Order Limits sits within the CNL boundary. **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056],** sets out four alternative construction routes have been assessed, but none were considered suitable due to various factors including narrow roads, the requirement to route through towns and villages, and alternative routes also being within the CNL (and therefore offering no benefit in terms of avoiding the CNL). **The Technical Note on Construction Routes in the Cotswolds National Landscape [REP1-131]** submitted at Deadline 1 provides further details on the justification for the routes through the CNL, including details of additional routes that were considered and reasons why they were discounted. Further, Wiltshire Council has confirmed in its relevant representation (Appendix A) **[RR-4934]** that the chosen route to/from the M4 via the A46, B4040, B4039 and Fosse Way (i.e. through the CNL) is the best of the alternatives considered.

8.3.219 On that basis, it is considered that there is no scope for developing all or part of the Scheme elsewhere, and therefore it is demonstrated that this limb of the test is met.

Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated

8.3.220 The effects of the Scheme on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated, have been assessed and reported in the relevant chapters of the **Environmental Statement [EN010168/APP6.1 to EN010168/APP/6.3]**. **ES Volume 1, Chapter 22: Summary of Residual Effects [APP-074]** summarises the residual significant effects of the Scheme as a whole.

8.3.221 Regarding effects on the CNL, a specific assessment of landscape and visual impacts on the CNL and its special qualities is provided in **ES Volume 3, Appendix 8-6: Assessment of the Effects on the Cotswolds National Landscape and its Special Qualities [REP6B-007]** and concludes that there are no direct significant effects on the special qualities of the CNL. Harm to the CNL itself would be minimal and beneficial landscape fabric effects within the setting of the CNL in the longer term would further the purposes of the CNL.

8.3.222 Further, the **Tranquillity Technical Note [PDA-010]** provides a summary of which application documents refer to relevant receptors location within or adjacent to the CNL and the effects that have been reported in these. This confirms that no significant effects are anticipated on receptors within or directly adjacent to the CNL in relation to landscape, cultural heritage, transport and access, and noise and vibration. Compliance with the Cotswolds National Landscape Management Plan 2025-2030 and the relevant CNL position statements has been demonstrated, as set out in **Annex E** of this Planning Statement.

8.3.223 Significant visual effects are anticipated in relation to five receptors which have a visual relationship with the CNL, and significant tourism and recreation effects are anticipated in relation to seven tourism and recreation receptors within or directly adjacent to the CNL, as set out in the tables below.

Table 8-1 Significant visual effects within or directly adjacent to the CNL

Receptor	Significant Effect
Construction Phase and Operation Phase Year 1 (reducing to not significant at Operation Year 15 and Decommissioning)	
RI014 Widley's Farm, Sherston	Moderate adverse
RI024 Fosse Lodge, Grittleton	Moderate adverse
TP037 Footpath WT/NORT/1	Major/moderate adverse
TR145 Fosse Way	Moderate adverse
TR154 Road Junction Southfields South East Y Junction, Sherston	Moderate adverse

Table 8-2Significant socio-economic, tourism and recreation effects within or directly adjacent to the CNL

Receptor	Significant Effect
Construction Phase	
Unsurfaced highway, Track crossing railway, Rodbourne	Medium term temporary moderate adverse
Unsurfaced highway, Track parallel to railway, Rodbourne	Medium term temporary moderate adverse

Receptor	Significant Effect
Fosse Way	Medium-term temporary moderate adverse
Long Path	Medium-term temporary moderate adverse
Palladian Way	Medium-term temporary moderate adverse
Wiltshire Way	Medium-term temporary moderate adverse
Equestrian facilities: Park Farm	Medium-term temporary moderate adverse
Operation and Maintenance Phase	
Fosse Way	Long-term temporary moderate adverse
Decommissioning	
Fosse Way	Medium-term temporary moderate adverse
Long Path	Medium-term temporary moderate adverse
Palladian Way	Medium-term temporary moderate adverse
Wiltshire Way	Medium-term temporary moderate adverse

8.3.224 Proposed mitigation measures to mitigate the visual effects of the Scheme on the CNL are set out in the **Outline CEMP [REP6-029], Outline OEMP [REP6-031], Outline Decommissioning Strategy [REP6-033] and Outline Landscape and Ecological Management Plan [APP-283].** Proposed mitigation measures to mitigate the socio-economic, tourism and recreation effects of the Scheme on the CNL during the construction, operation and maintenance, and decommissioning phases are detailed in the **Outline CEMP [REP6-029], Outline OEMP [REP6-031], Outline Decommissioning Strategy [REP6-033], Outline PRoW and Permissive Paths Management Plan [REP1-104]** and the **Outline Skills, Supply Chain and Employment Plan [REP3-104]**.

8.3.225 The above significant effects have been considered by the Applicant in the application of the planning balance, with landscape and visual being afforded moderate negative weight overall and tourism and recreation having been afforded limited negative weight overall. More generally, it is considered that these effects are far outweighed by the wider benefits of

the Scheme, including proposed enhancements to PRoW, and the provision of 12.8 km of new permissive paths as set out in the **Outline PRoW and Permissive Paths Management Plan [REP1-104],** which will enhance connectivity in the local area and will help to improve recreation in the immediate vicinity, and also benefitting local population health and wellbeing in the long term.

8.3.226 It is considered that the third limb of the test has been satisfied. The Applicant has assessed the effects of the Scheme on the environment, the landscape and recreational opportunities, and sought to mitigate the effects where possible. As a result, the only residual significant adverse effects on receptors within and directly adjacent to the CNL relate to the socio-economic, tourism and recreation receptors listed above. It is considered that the benefits of the Scheme far outweigh the residual significant adverse effects on receptors within and directly adjacent to the CNL.

8.3.227 In conclusion, it is considered that the Scheme meets the exceptional circumstances test set out in NPS EN-1 paragraph 5.10.32.

8.3.228 NPS EN-1 paragraph 5.10.33 continues that for proposals within national landscapes, *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 [and] that any projects in these designated areas should be carried out to high environmental standards, including through the application of appropriate requirements where necessary."* It is considered that the Scheme meets this test for the reasons set out in the following paragraphs.

8.3.229 With regard to the obligation to seek to further the purposes of the CNL generally, **ES Volume 3, Appendix 8-6: Assessment of the Effects on the Cotswolds National Landscape and its Special Qualities [REP6B-007**sets out the measures that have been implemented in the design of the Scheme to seek to further the CNL's purposes. Further details are set out in the appraisal at paragraph 8.3.195 above. It is considered that the Scheme complies with the duty.

8.3.230 With regard to the specific elements of the Scheme within the CNL (being four Highway Improvement Areas comprising 2.16 ha), these will be carried out to high environmental standards. The **Technical Note on Construction Routes in the Cotswolds National Landscape [REP1-131**submitted at Deadline 1 provides further details, including that the Applicant will utilise appropriate construction materials, such as conservation kerbs, to be secured through the technical approval process and final CTMPs. The preparation, approval and implementation of the final CTMPs, substantially in accordance with the **Outline CTMP [REP6-**

041], are secured through Requirement 15 of Schedule 2 of the **Draft DCO [REP6-005]**, ensuring construction traffic impacts are appropriately managed throughout the construction phase of the Scheme.

8.3.231 In conclusion, it is considered that the Scheme meets the requirements of NPS EN-1 paragraph 5.10.33.

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

8.3.232 NPS EN-1 paragraph 5.11.1 recognises that:

"An energy infrastructure project will have a direct effect on the existing use of the proposed site and may have indirect effects on the use, or planned use, of land in the vicinity for other types of development. Given the likely locations of energy infrastructure projects there may be particular effects on open space including green and blue infrastructure."

8.3.233 NPS EN-1 Part 5.11 sets out policy guidance that should be considered in relation to Green Belt, previously developed land, soil resources, contamination, green infrastructure, agricultural land, food security, and PRoW. The Scheme's compliance with each topic has been appraised separately below.

Green Belt

8.3.234 NPS EN-1 paragraphs 5.11.36 – 5.11.38 set out the policy tests the Secretary of State should apply for applications located in the Green Belt. The Scheme is not located in the Green Belt and, as set out in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the Bath Green Belt was specifically excluded from the search area for reasonably available alternative sites for the Scheme.

Previously Developed Land

8.3.235 NPS EN-1 paragraph 5.11.3 recognises that the re-use of previously developed land may not be possible for many forms of energy infrastructure. NPS EN-1 paragraph 5.11.18 continues that where developments are proposed on previously developed land, applicants should ensure they have considered the risks posed by land contamination and opportunities for remediation. NPS EN-3 includes solar-specific policy regarding previously developed land and provides that while land type should not be a predominating factor in site selection for a development, applicants should, where possible utilise suitable previously developed land (NPS EN-3 paragraph 2.10.29).

8.3.236 **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** sets out how previously developed land has been considered in the search for alternative sites for the Scheme through a review of the relevant local brownfield land registers. It concludes that no brownfield land sites are available at a sufficient size to accommodate the Scheme, either individually or in combination with other sites. On this basis, the Applicant considers that the policy test to consider previously developed land has been met.

Soil Resources

8.3.237 NPS EN-1 paragraph 5.11.4 provides that development:

"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 local water regime, organic matter content, soil biodiversity and soil process."

8.3.238 NPS EN-3 also contains solar specific policy regarding soil resources and NPS EN-3 paragraph 2.10.34 states that applicants are encouraged to develop and implement a Soil Resources and Management Plan which could help use and manage soils sustainably and minimise adverse impacts on soil health and potential contamination.

8.3.239 As set out in, **ES Volume 1, Chapter 17: Soils and Agriculture [REP3-021],** due to the temporary nature of the Scheme, and the measures in place to restore the land to its original use and condition as far as practicable after the Scheme is decommissioned, there are no permanent significant effects anticipated. Instead, the anticipated residual significant effects are temporary and limited mainly to the construction and decommissioning phases of the Scheme.

8.3.240 In compliance with NPS EN-3 paragraph 2.10.34, the **Outline Soils Resources Management Plan (SRMP) [REP6-035]** sets out the overall approach for managing soil resources affected by the Scheme during its construction, any monitoring, maintenance or replacement works, and during decommissioning of the Scheme. This includes details of soil handling methods for stripping, stockpiling and reinstatement of soils, land restoration methods, and monitoring procedures. For instance, soils would only be handled or tracked across when in a dry and friable condition and topsoils and subsoils would be handled separately. Such measures will help to mitigate the potential damage to and compaction of soil resources during construction and decommissioning in compliance with NPS EN-1 paragraph 5.11.13. With such embedded mitigation in place, temporary moderate adverse effects on soil resources are anticipated, which are considered to be significant residual effects.

8.3.241 During operation, **ES Volume 1, Chapter 17: Soils and Agriculture [REP3-021]** confirms that no further intrusive disturbance to the land or soil resources is anticipated. It is assumed that any maintenance and replacement activities will adhere to good practices as set out in the **Outline SRMP [REP6-035]** with regard to tracking across the land in appropriate conditions. As a result, no significant effects are anticipated to arise during the operational phase of the Scheme.

8.3.242 Further, by leaving the land undisturbed under long-term grassland, soil health, quality and structure within the Solar PV Sites are likely to improve during the lifetime of the scheme. This results in a temporary, moderate beneficial significant effect on soil resources in the decommissioning phase.

8.3.243 In summary, whilst temporary moderate significant adverse effects on soil resources are anticipated during the construction of the Scheme, this is balanced by the temporary moderate significant beneficial effect which results from taking land out of intensive arable production for 60 years. As a result, it is considered that soil resources should be given neutral weight in the planning balance.

Agricultural Land

8.3.244 NPS EN-1 paragraph 5.11.34 provides that the Secretary of State should:

"Ensure that applicants do not site their scheme on the best and most versatile (BMV) 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 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 higher quality."

8.3.245 NPS EN-3 acknowledges that ground mounted solar is not prohibited on BMV land (NPS EN-3 paragraph 2.10.30), and states that while land type should not be a predominating factor in determining a site's suitability for solar development, poorer quality land should be preferred and BMV land avoided where possible (NPS EN-3 paragraph 2.10.29). NPS EN-3 paragraph 2.10.31 states that it is recognised that at this scale, it is likely that applicants' development will use some agricultural land; the choice of site should be explained by the Applicant, noting a preference for development to be situated on suitable brownfield, industrial and low and medium grade agricultural land. NPS EN-3 paragraph 2.10.145 reiterates that the Secretary of State should take into account the economic and other benefits of any BMV land within a proposed development, and that it should ensure there are appropriate mitigation measures to minimise impact on soil resources.

8.3.246 At a local level, Core Policy 42 of the Wiltshire Core Strategy provides that proposals for standalone renewable energy installations need to demonstrate how impacts on BMV land have been assessed and taken into account.

8.3.247 Due to the size and nature of the Scheme, the Order Limits are predominantly located on agricultural land. The proportions of BMV land within the Order Limits is set out in **Section 3.4** of this Planning Statement, **ES Volume 1 Chapter 17: Soils and Agriculture [REP3-021]** and are mapped on **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172].** Agricultural Land Classification surveys have confirmed that the majority (68%) of land within the Solar PV Sites comprises non-BMV Land. 33% of the l land within the Solar PV Sites is BMV Land, made up of 27% Subgrade 3a (202.5 ha) and 4% Grade 2 (30.8 ha). There are no areas of Grade 1 land within the Solar PV Sites. For the Cable Route Corridor, 69% of the land is classed as BMV (49% Grade 3a and 3% Grade 2). There are no areas of Grade 1 land within the Cable Route Corridor. 22% of land within the Cable Route Corridor is non-agricultural.

8.3.248 The remainder of this subsection sets out why the use of BMV land is justified, in line with relevant planning policy.

Site Selection

8.3.249 In compliance with NPS EN-3 paragraph 2.10.29, the Applicant has sought to identify non-BMV agricultural land in its site selection for the Scheme. **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** sets out the methodology adopted when assessing other suitable alternative sites for the Scheme and confirms that, in the initial search for sites, agricultural land within a classification of Grade 3, Grade 2 or Grade 1 was excluded from the search in order to identify sites on non-BMV land. It also sets out how the Applicant considered non-agricultural land, such as rooftops and previously developed land. Ultimately, none of the alternative sites (on non-agricultural land or lower quality agricultural land) were assessed to be viable for the Scheme and therefore Grade 3 agricultural land was added to the search area. On that basis, it can be demonstrated that the Applicant has taken a sequential approach site selection in order to minimise impacts on BMV land, in accordance with NPS EN-1, NPS EN-3 and local policy.

Design Evolution of the Solar PV Sites

8.3.250 In compliance with paragraphs 2.10.29 to 2.10.31, the Applicant has been mindful of the use of BMV land during the design evolution of the Scheme and has sought to limit the amount of BMV used wherever practicable. Further, reductions in the Order Limits for other reasons, such as

landscape constraints to protect the setting of the CNL and limit views from the Fosse Way and heritage constraints, have resulted in the reduction of BMV land required for the Scheme overall. This includes the removal of fields C2, C3 and C4 from the Order Limits to protect the setting of the CNL, which resulted in the removal of approximately 25 ha of Grade 3 land (based on publicly available 1970's provisional ALC mapping as detailed soil surveys have not been undertaken on these fields) and removal of a total of 5.85 ha of Grade 3a land across Fields B2, B3 and B9 (based on detailed soil surveys).

8.3.251 As shown on **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]**, the majority of the Grade 3a BMV land (and some smaller pockets of Grade 2 BMV Land) located within the Solar PV Sites is intermingled with sections of non-BMV land (Subgrade 3b and Grade 4). In several instances, fields contain a mixture of both BMV and non-BMV land. In such circumstances, designing the Scheme to remove those areas of Grade 3a BMV land from the Order Limits would not be practicable and would adversely affect the Scheme's overall viability.

Consideration of farming circumstances

8.3.252 The Applicant has considered the effect on farming circumstances as a result of the inclusion of BMV land within the Solar PV Sites. The inclusion of BMV land is necessary for the operation of the Scheme, particularly in light of other removals from the Order Limits and design changes during the design evolution which required a reduction in the areas identified for Solar PV Panels. The reasoning behind the reduction in areas for Solar PV Panels is detailed in the **Design Approach Document [APP-268]** and include exclusion of Solar PV Panels in parts of:

- Lime Down A to protect the setting of the CNL;
- Lime Down B to minimise impacts to the heritage features of the Fosse Way, to minimise impacts on users of the Fosse Way and to minimise landscape impacts;
- Lime Down C to protect the setting of the CNL;
- Lime Down D to minimise heritage impacts on Bradfield Manor, minimise impacts on PRoW and minimise impacts on sensitive receptors; and
- Lime Down E due to landscape and visibility matters.

8.3.253 In line with NPS EN-1 paragraph 5.11.34, the Applicant has taken account of the productivity and economic benefits of the BMV land proposed to be used for the Scheme. The Applicant is aware that the tenant farmers

affected by the loss of BMV land from their farm businesses are in discussions with the relevant landowners about alternative land that could be utilised for farming in place of the BMV land proposed to be used for the Scheme. The Applicant understands that the solutions being explored would utilise land outside of the Solar PV Sites. The likely socio-economic effects on tenant farmers (in terms of job losses) has been assessed in **ES Volume 1, Chapter 16: Socio-economics, Tourism and Recreation [APP-068].** Further, the Applicant submitted the additional **Farming and Food Security Technical Note [REP4-079]** at Deadline 4 of the Examination, which confirms that there will be little to no change to the farming operations of affected landholdings within the Solar PV Sites.

8.3.254 In addition to the above, the use of BMV land is justified because:

- The parcels of Grade 2 land in Lime Down E are optimal for siting Solar PV Panels due to being south facing and their proximity to the rest of the Scheme, and their inclusion is required to offset the loss of locations for Solar PV Panels in other areas of the Scheme detailed above;
- The Scheme is temporary and reversible in nature and therefore will not affect the long-term agricultural resource. Upon decommissioning, all land (including the BESS Area and substations) will be returned to its previous use and condition as far as is practicable. The decommissioning measures set out in the **Outline Decommissioning Strategy [REP6-033]** are secured by Requirement 20 in Schedule 2 of the **Draft DCO [REP6-005].** The exception to this is established habitats such as hedgerows and woodland, which it is assumed would be retained by the relevant landowner given their potential benefits to agricultural land and the wider farming estate;
- In compliance with NPS EN-3 paragraph 2.10.32, the design of the Solar PV Sites is compatible with certain farming practices, such as sheep grazing, which could continue during operation of the Scheme. Therefore, whilst the land would not be available for crop production, there may be an opportunity to limit the effects on agricultural production during the Scheme's lifetime through other forms of agricultural practice;
- Mitigation is proposed as set out in the **Outline Soil Resources Management Plan [REP6-035]** to reduce the effects on soils as a result of the Scheme. Whilst the construction of the Scheme is anticipated to result in temporary moderate adverse residual significant effects on soil resources (through construction site activities), there are also anticipated temporary moderate benefits to soil health at decommissioning as a result of removing the land

from intensive agricultural practices for the Scheme's lifetime. Further details are provided in **ES Volume 1, Chapter 17: Soils and Agriculture [REP3-021]**; and

- The substantial benefits of the Scheme justify the inclusion of BMV land, namely the Scheme's contribution to meeting the established and urgent need for renewable energy infrastructure such as solar, which has been identified as a critical national priority in NPS EN-1 Part 4.2. Paragraph 4.2.6 of NPS EN-1 is clear that:

  "The overarching need case for each type of energy infrastructure and the substantial weight which should be given to this need in assessing applications, as set out in paragraphs 3.2.6 to 3.2.8 of EN-1, is the starting point for all assessments of energy infrastructure applications."

  This, together with the other wider economic and environmental benefits set out in **Section 5** of this Planning Statement, justify the use of some BMV land, which is necessary in order to deliver a Scheme of this scale and to ensure its viability.

8.3.255 In summary, the Scheme demonstrates compliance with NPS EN-1, NPS EN-3 and local policy. Although the Scheme does include BMV land, the Applicant has sought to minimise the amount of BMV land by adopting a sequential approach in its site selection and can justify its inclusion for the reasons set out above, including the significant wider benefits that the Scheme will bring. Further, NPS EN-3 acknowledges that ground mounted solar is not prohibited on BMV land and should not be a predominating factor in site selection. However, in acknowledgement that the Scheme does require use of some BMV land, it is considered that agricultural land should be afforded moderate negative weight in the planning balance.

Food Security

8.3.256 The NPSs do not contain specific policy in relation to food security, but it has been mentioned in various consultation comments.

8.3.257 In the context of local plan making, the August 2026 NPPF does not contain any specific policies regarding protection of agricultural land in the context of food security and the 2024 Written Ministerial Statement on Solar and protecting our Food Security and Best and Most Versatile Agricultural Land" (Ref-52) has been revoked. The NPPF (Policy N2) does make clear, in line with NPS EN-1, that development proposals should take into account the quality of agricultural land and if significant development of agricultural land is necessary, developments should use areas of poorer quality land where possible.

8.3.258 Ed Miliband, the then Secretary of State for Energy Security and Net Zero's statement to Parliament on 18 July 2024 called "Clean Energy Superpower Mission" (Ref-53) stated:

"Credible external estimates suggest that ground mounted solar used just 0.1% of our land in 2022. The biggest threat to nature and food security and to our rural communities is not solar panels or onshore wind; it is the climate crisis, which threatens our best farmland, food production and the livelihoods of farms."

8.3.259 Similarly, analysis in the Land Use Framework (March 2026) (Ref-56) confirms that there is enough land to deliver the government's objectives for nature restoration and development without reducing domestic food production or compromising on these objectives. In relation to renewable energy infrastructure, the Land Use Framework estimates that the amount of land in England required to meet renewable energy objectives in 2050 would be around 1% of England's total land and around 2% of the Utilised Agricultural Area. The Framework accepts that there is inherent uncertainty in forecasting the electricity mix to 2050 and that this land use figure for renewables could be over 2%, but it still represents a very small proportion or the total Utilised Agricultural Area. On that basis, it is not considered that the Scheme will compromise the nation's food security.

8.3.260 In response to the Examining Authority's First Written Questions LSF1.1 (see **[REP3-128]**), the Applicant produced a **Farming and Food Security Technical Note [REP4-079],** which further explores the policy on land use and provides details of Government subsidies in agriculture; puts UK food security in the context of other funding, land use decisions and other trade considerations; details the local context of the Scheme in relation to land use in Wiltshire; and provides commentary on the cumulative losses of agricultural land to solar developments. The report concludes that there will be little to no change to the farming operations of the affected land holdings comprising the Solar PV Sites and therefore little to no change to local food production resulting from the Scheme. Further, the report concludes that the area occupied by the Scheme amounts to 0.26% of the agricultural land in Wiltshire, showing that the loss of agricultural land use is not significant at county scale. The Applicant also considers that the Scheme will have a negligible effect in terms of local and national food security when taken in consideration among other factors across all spatial, social and political scales.

8.3.261 On that basis, the inclusion of BMV land with the Scheme is in line with the relevant NPSs, the current NPPF and the most recent government guidance.

Contamination

8.3.262 NPS EN-1 paragraph 5.11.5 states that where pre-existing land contamination is being considered within a development, the objective is to ensure the site is suitable for its intended use. NPS EN-1 paragraph 5.11.17 provides that applicants should ensure that a site is suitable for its proposed use, taking account of ground conditions and any risks arising from land instability and contamination.

8.3.263 Ground conditions and contamination are assessed in **ES Volume 1, Chapter 19: Ground Conditions [REP5-026]**. Preliminary Risk Assessments (PRA) have been undertaken for each of the Solar PV Sites and the Cable Route Corridor to assess the current land condition within the Order Limits and identify any potential contaminants. The PRAs are set out at **ES Volume 3, Appendices 19-1 to 19-8 [REP3-068 to REP3-080]** and the key findings are set out in **ES Volume 1, Chapter 19: Ground Conditions [REP5-026]**.

8.3.264 The potential risks that have been identified from potential contaminated land have been assessed by the PRAs across the Solar PV Sites as typically very low to low risk from contaminated land to human health and controlled water receptors, albeit there may be unforeseen ground conditions or contamination from farming practices, infilled ground (such as former ponds) and/or historic quarry operations (these risks are unlikely to pose a material risk to the Scheme). The PRAs in relation to the Cable Route Corridor conclude that there is a low risk from contaminated land to human health however a moderate risk of ground gas associated with infilled quarries and sewage gas. A moderate risk to controlled waters has also been identified due to agricultural runoff. There is also a potential for a moderate/low risk to Secondary A Aquifers and source protection zones if made ground or pollution incidents are encountered. The cable route presents a potential contaminant pathway.

8.3.265 **ES Volume 1, Chapter 19: Ground Conditions [REP5-026]** concludes that, with implementation of the embedded mitigation set out in Chapter 19, no likely significant effects are anticipated. The proposed mitigation includes the measures set out in the **Outline CEMP [REP6-029], Outline Site Waste Management Plan (SWMP) [REP1-102]** and **Outline SRMP [REP6-035]** to manage the hazards associated with contaminants during the construction phase of the development, and similarly measures in the **Outline OEMP [REP6-031]** and **Outline Decommissioning Strategy [REP6-033]** for the operation and maintenance and decommissioning phases. The measures outlined in the outline management plans will be secured by Requirements in Schedule 2 of the **Draft DCO [REP6-005]**.

8.3.266 In summary, the Applicant has assessed the current ground conditions of the Order Limits for pre-existing ground contamination and the likely

effects of the Scheme in relation to ground conditions. The impacts of the Scheme on ground conditions can be appropriately controlled to acceptable standards and measures have been put in place to monitor and further investigate potential areas of contamination. The Applicant considers the Scheme to be incompliance with NPS EN-1 in relation to ground conditions, which should be given neutral weight in the planning balance.

Green Infrastructure

8.3.267 NPS EN-1 paragraph 5.11.7 recognises the role that green and blue infrastructure can have in developments to provide positive environmental, social, health and economic benefits.

8.3.268 The Scheme, being located largely on existing agricultural land, is not anticipated to directly impact on the use and accessibility of dedicated recreational spaces such as parks, open spaces and playing fields, with the exception of Whitley Golf Club which is discussed further below under "Existing Open Space". Further, the **Outline LEMP [REP6-037]** sets out the Applicant's proposals to substantially strengthen green and blue infrastructure within the Order Limits including enhancements to hedgerows, tree planting and creation of ponds which will improve landscape structure and ecological connectivity, demonstrating compliance with NPS EN-1. Green Infrastructure has been considered further in the context of Biodiversity and Geological Conservation and Landscape, as set out above.

Existing Open Space

8.3.269 NPS EN-1 paragraphs 5.11.9 – 5.11.10 provides that applicants will need to consult the local community on their proposals to build on existing open space, sports or recreational buildings and land. In decision making, NPS EN-1 paragraph 5.11.32 provides that the Secretary of State should not grant consent for development on existing open space, sports and recreational buildings and land unless an assessment has been undertaken to show the facilities are surplus to requirements, and that the benefits of the development outweigh the potential loss of the facilities.

8.3.270 The Order Limits intersect a small area of the existing Whitley Golf Club (part of the tee-ff area for Hole 2/11), immediately west of the Existing National Grid Melksham Substation. This area is included within the Order Limits to allow flexibility for access and cabling works required to connect the Scheme into the Existing National Grid Melksham Substation. However, it is not yet known which bay the Scheme will connect into and depending on final design decisions at the detailed design stage, it may not be required. In the event that development is required in that area, this will be temporary during the construction phase and will relate to the

laying of underground cables which, once installed, will not affect the use of the Golf Club. The likely effects on Whitley Golf Club have been assessed in **ES Volume 1, Chapter 16: Socio-economics, Tourism and Recreation [APP-068]** which confirms that no significant effects are anticipated and embedded safety measures will ensure that Scheme construction staff and golf players are suitably separated by temporary barriers. Subject to detailed design of the finalised Grid Connection Cable routing, and in co-ordination with the operators of Whitley Golf Club, the tee off areas for Hole 2/11 may if required be temporarily moved during construction of the cable in this section to ensure the use of the facility is not interrupted. Therefore, no loss of the facilities is anticipated as a result of the Scheme and an independent assessment required under NPS EN-1 paragraphs 5.11.9 and 5.11.10 has accordingly not been undertaken.

Existing and Proposed Uses

8.3.271 NPS EN-1 paragraph 5.11.8 provides that the ES should identify existing and proposed land uses near the project and assess the likely effects of the proposed development on that use, including any effects of precluding a new development or use proposed in the development plan.

8.3.272 Land within the Order Limits is largely used for agriculture, and the effect on agricultural land has been considered separately above.

8.3.273 The Applicant has ensured in its site selection for the Scheme that local site allocations within the Wiltshire development plan are avoided, with none being present within the Order Limits (discussed further in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185])**. Therefore the Scheme will not preclude proposed land uses within the Order Limits.

8.3.274 With regard to proposed land uses nearby, **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-073]** considers other nearby proposed developments and the potential for cumulative effects and effect interactions as a result of the Scheme. It concludes that, taking a conservative worst case approach, significant cumulative effects with the short list of developments are identified at a limited and discrete number of receptors comprising tourism and recreation impacts during the construction phase for example, on Corsham Park, PRoW WT|CORM|122, WT|HULL|29, and Sustrans Cycle Route 403, and on skylark at a District level.

Public Rights of Way

8.3.275 NPS EN-1 paragraph 5.11.30 provides that the Secretary of State should expect applicants to take appropriate mitigation measures to address adverse effects on rights of way and, where appropriate, to consider

opportunities for improvements or new accesses. Where mitigation is proposed, the Secretary of State should consider whether they are appropriate and whether the DCO should include requirements or other measures to secure them.

8.3.276 With regard to solar specific policy, NPS EN-3 contains similar provisions regarding the protection and enhancement of PRoW (NPS EN-3 paragraph 2.10.44) and also encourages Applicants to ensure the continued recreational use of PRoW where possible during construction and, in particular, operation of the site (NPS EN-3 paragraph 2.10.42). NPS EN-3 paragraph 2.10.41 acknowledges that PRoW may need to be temporarily closed or diverted to enable construction, and states that applicants should keep, as far as is practicable and safe, all PRoW that cross the proposed development site open during construction and protect users where a public right of way crosses the site.

8.3.277 In accordance with NPS EN-3 paragraph 2.10.45 the Applicant has set out how PRoW would be managed in the **Outline PRoW and Permissive Paths Management Plan [REP1-104]**.

8.3.278 In compliance with NPS EN-3 paragraph 2.10.41, it is anticipated that PRoW which cross the Order Limits will generally remain open during the construction, operation and maintenance and decommissioning phases of the Scheme and will be managed in accordance with the measures in the **Outline PRoW and Permissive Paths Management Plan [REP1-104]** to ensure user safety, for instance at construction vehicle crossings. However, the following temporary closures/diversions are envisaged (see the **Public Rights of Way Plan [REP5-008]** for the locations of the closures/diversions):

- PRoW MALW54 will be temporarily diverted for the duration of the construction phase for health and safety reasons and to avoid conflict with construction vehicles accessing Lime Down E, at Access 18. The diversion will run adjacent to the existing alignment. Once construction is complete, the PRoW will return to its existing alignment;
- PRoW GRIT20 (located in the Cable Route Corridor) will be temporarily diverted for the duration of the construction phase for health and safety reasons and to avoid conflict with construction vehicle access at Access 102. The diversion will run adjacent to the construction compound to the north and east. Once construction is complete, the PRoW will return to its existing alignment; and
- Temporary closures may also be required during construction for installation of Grid Connection Cables, but this will likely last not more than one day (or overnight). Where temporary closures are

deemed to be necessary, these will be prioritised for overnight work (when there are unlikely to be PRoW users), and sufficient notice will be given to users and the local highway authority so far as practicable.

8.3.279 **ES Volume 1, Chapter 13: Transport and Access [REP4-014]** includes an assessment of likely effects on PRoW from a transport and access perspective and concludes that there are no residual significant effects anticipated on PRoW as a result of the Scheme. Socio-economic effects on PRoW are dealt with separately in the appraisal of socio-economic impacts below (see paragraph 8.3.257) and **ES Volume 1, Chapter 16: Socio-economics, Tourism and Recreation [APP-068]** concludes that there will be residual adverse effects on long distance recreational routes (during construction, peak replacement activities and decommissioning) together with adverse effects on public bridleway WT/MALW/54 during the construction phase. **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-005]** assesses the impacts on PRoW from a landscape and visual perspective and concludes that during construction and at Operation Year 1, 27 public receptors would experience significant visual effects. As planting matures, at Operation – Year 15 and at de-commissioning, significant effects would be reduced to 10 affected public receptors.

8.3.280 In recognition of the residual adverse significant effects anticipated on PRoWs from a socio-economic and visual perspective, it is considered that effects on PRoW should be afforded moderate negative weight in the planning balance.

8.3.281 However, in compliance with NPS EN-3 paragraph 2.10.44, the Scheme will enhance and improve connectivity in line with NPS EN-1 and the project design principles outlined in the **Design Approach Document [APP-268]** through the creation of 12.8 km of new permissive paths, which will be open up to 365 days per calendar year throughout the proposed 60-year operational lifetime of the Scheme. The location of the permissive paths is shown on the **Works Plan [REP6-004]** as Work No.10B, indicated on **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [REP6-009]** and they are listed in the **Outline PRoW and Permissive Paths Management Plan [REP1-104]**. Their creation and maintenance is secured through Requirement 16 in Schedule 2 to the **Draft DCO [REP6-005]**. In recognition of this beneficial effect, it is considered that the creation of permissive paths should be afforded substantial positive weight in the planning balance.

Noise and Vibration

Planning Policy Context

8.3.282 NPS EN-1 part 5.12 recognises the effect that excessive noise from energy developments can have on human health, wildlife and biodiversity and provides that applicants should carry out a noise assessment. The noise assessment should cover the requirements set out in NPS EN-1 part 5.12, which includes a requirement to assess effects on human receptors in line with the principles of the relevant British Standards and other guidance, and consider ancillary increases in noise such as from increased traffic movements.

8.3.283 In decision making, NPS EN-1 paragraph 5.12.17 provides that the Secretary of State should not grant development consent unless they are satisfied that the proposals:

"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."

8.3.284 NPS EN-1 paragraph 5.12.16 requires applicants to have due regard to statutory requirements, the NPPF and the Noise Policy Statement for England (Ref-54) (NPSE). The NPSE mirrors the decision-making requirements of NPS EN-1 paragraph 5.12.17 and sets out definitions for significant adverse and lowest adverse effects levels to be used in noise assessments. These are described as:

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

8.3.285 The NPSE outlines in paragraph 2.24 that:

"Where the impact lies somewhere between LOAEL and SOAEL. It requires that all reasonable steps should be taken to mitigate and minimise adverse effects on health and quality of life."

8.3.286 Policy P3(2)(b) of the NPPF states that proposals should:

"not give rise to or contribute to an unacceptable level of … noise… or other forms of pollution on or beyond the site."

8.3.287 NPPF Policy P3(2)(d) continues that proposals should:

"mitigate and reduce to a minimum potential adverse impacts resulting from noise, not result in levels of noise exposure which would have a significant observed adverse effect, and maintain the character of tranquil areas (those areas that have remained relatively undisturbed by noise from human sources and are prized for their recreational amenity value for this reason."

8.3.288 At a local level, Core Policy 42: Standalone Renewable Energy Installations of the Wiltshire Core Policy provides that standalone renewable energy schemes will need to demonstrate how impacts on residential amenity, including noise, have been satisfactorily assessed. Core Policy 51: Landscape provides that developments will need to demonstrate how the tranquillity of the landscape has been preserved through protection against noise.

Assessment Conclusions

8.3.289 **ES Volume 1, Chapter 14: Noise and Vibration [REP5-024]** identifies and proposes measures to address potential impacts and likely significant effects noise as a result of the Scheme. It concludes that, with embedded mitigation, there are no significant effects anticipated in relation to noise during the construction, operation and maintenance, or decommissioning phases of the Scheme.

8.3.290 Without mitigation, construction noise created by the main activities of construction at receptors around the Solar PV Sites and Cable Route Corridor remain below the daytime SOAEL except for one receptor relating to the Cable Route Corridor (R58: Silver Street), where the calculated construction noise levels are equal to the SOAEL and therefore represent a significant moderate adverse effect without mitigation. However, this is based on the worst-case scenario (without mitigation and not taking account of the sequential nature of works), and it is expected that, with the inclusion of embedded mitigation measures, construction noise levels would be below the SOAEL at R58 resulting in no significant effects. Measures to control noise are outlined in the **Outline CEMP [REP6-029]**, to be secured through Requirement 13 in Schedule 2 of the **Draft DCO [REP6-005]**.

8.3.291 Without mitigation, noise relating to horizontal directional drilling (HDD) during the construction phase has been identified as likely to result in significant adverse effects (an exceedance of SOAEL) during the night at the majority of identified sensitive receptors within 500 m of activities. However, it should be noted that this identification of a likely significant effect is precautionary as it is expected that HDD activities outside of the daytime period would only be required if there is a clear and obvious benefit, such as for safety reasons or to avoid daytime disruption to many people. Additionally, it should be noted that HDD activities are, at worst,

expected to last three days and, as such, the predicted noise levels will be short-term and temporary in nature. With mitigation, the anticipated effect is reduced to not significant.

8.3.292 No significant effects regarding noise are anticipated as a result of construction traffic.

8.3.293 As to vibration, it is anticipated that with embedded and additional mitigation, all construction vibration effects would be not significant at sensitive receptors. Additional mitigation in the form of a detailed and bespoke communications strategy, is required in relation to four receptors (R52 Ivy House, R56 the Roebuck, R58 Silver Street, and R66 Thingley Farm) to mitigate against vibration effects during compaction works in the Cable Route Corridor in the construction phase. This strategy would include a requirement to inform occupants on the precise timing and duration of the associated construction activity that could lead to high noise and vibration levels for a short period.

Appraisal

8.3.294 In line with the policy requirements of NPS EN-1, the Applicant has assessed the likely noise and vibration impacts of the Scheme including consideration of the existing noise environment, proximity to noise sensitive receptors, and wildlife habitats that might be sensitive to noise and how the noise environment will change as a result of the Scheme.

8.3.295 The assessment methodology considers the LOAEL and SOAEL assessment indicators outlined in the NPSE, demonstrating compliance with NPS EN-1 paragraph 5.12.16, and threshold noise levels have been determined in accordance with the relevant British Standards in line with NPS EN-1 paragraph 5.12.9.

8.3.296 The noise and vibration impacts from construction traffic are also assessed as required by NPS EN-1 paragraph 5.12.8 and NPS EN-3 paragraphs 2.10.161 – 2.10.162 and the assessment concludes that no significant effects are anticipated as a result of construction traffic. The **Outline CTMP [REP6-041]** provides a framework for the management of construction vehicle movements to and from the Scheme, to ensure that the effects of the temporary construction phase on the local highway network are minimised, including those associated with noise and vibration. Compliance with the final CTMP, which will substantially accord with the **Outline CTMP [REP6-041]**, is secured via Requirement 15 in Schedule 2 of the **Draft DCO [REP6-005]**.

8.3.297 Effects on human health as a result of noise and vibration are specifically assessed in **ES Volume 1, Chapter 18: Human Health [APP-070],** including consideration of the potential effects on vulnerable people such as those with sensory impairments, mental disabilities and those less able

to move around or leave their properties. It states that, on the basis of the noise assessment provided in **ES Volume 1, Chapter 14: Noise and Vibration [REP5-024]**, the resultant effect to human health for those at highest risk is anticipated to be up to a short to medium term minor/negligible adverse effect (and not significant) on their health and wellbeing.

8.3.298 **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010]** provides an assessment of the likely impacts of noise from the Scheme upon ecological receptors, particularly in the context of bats. With embedded mitigation, no significant adverse effects are identified in relation to noise.

8.3.299 In accordance with NPS EN-1 paragraph 5.12.12, mitigation has been incorporated to minimise potential adverse effects on health and quality of life. Mitigation measures are summarised in **ES Volume 1, Chapter 14: Noise and Vibration [REP5-024]** and include the following (in line with the possible mitigation measures outlined in NPS EN-1 paragraph 5.12.14):

- Engineering mitigation to reduce the noise generated at source: This includes, for example, a 2 m bund with additional 3 m barrier around the eastern and southern boundary of the BESS Area to attenuate noise and to reduce visual impacts as shown in **ES Volume 2, Figure 3-3: 400kV Substation and BESS Layout [APP-083],** use of silencer units on BESS Containers, BESS Inverters and some Conversion Units, and housing all 132 kV and 400 kV Substation transformers in enclosures;
- Lay-out: For example, the BESS Area has been sited in a position away from noise sensitive areas, as far as practicable;
- Administrative measures: For example, as far as practicable, timing work to avoid noisy operations occurring simultaneously near to the same sensitive receptor, adherence to core working hours (except in certain defined circumstances) to avoid noisy work at unsociable hours, and the provision of information to the local authority and local residents about noisy or vibration causing works that are due to take place; and
- Insulation measures: Control measures during the construction and decommissioning phases to minimise noise and vibration, including the use of temporary screens where practicable when working close to sensitive receptors, and the use of silenced and properly maintained equipment to reduce noise at source.

8.3.300 A construction noise monitoring scheme will be developed in line with the **Outline CEMP [REP6-029]** and agreed with appropriate stakeholders

following appointment of a principal contractor and prior to commencement of construction works as part of any Section 61 consent applications. Requirements for monitoring during the Decommissioning phase will be undertaken in line with the requirements of the **Outline Decommissioning Strategy [REP6-033]**.

8.3.301 The Scheme demonstrates compliance with the decision-making requirements of NPS EN-1 paragraph 5.12.17 as follows:

- It avoids significant adverse impacts on health and quality of life from noise and vibration: as reported in **ES Volume 1, Chapter 14: Noise and Vibration [REP5-024],** the design of the Scheme avoids significant adverse impacts except at a small number of noise sensitive receptors when certain temporary construction activities are being carried out (e.g. HDD). Where potential significant adverse effects have been identified, these have been avoided through the implementation of appropriate mitigation, or are assessed as not significant due to the short-term nature of the works. As a result, there are no residual significant adverse effects anticipated as a result of the Scheme; and
- It mitigates and minimises other adverse impacts on health and quality of life from noise and vibration: embedded mitigation measures as outlined in **ES Volume 1, Chapter 14: Noise and Vibration [REP5-024]** will mitigate and minimise other non-significant adverse impacts where predicted noise levels are anticipated to be either below LOAEL or between LOAEL and SOAEL.

8.3.302 In summary, the Scheme demonstrates compliance with NPS EN-1, the NPPF and local policy in relation to noise and it is considered that noise and vibration should be given a neutral weight in the planning balance.

Socio-economic Impacts

Planning Policy Context

8.3.303 NPS EN-1 paragraph 5.13.2 provides that where a project is likely to have socio-economic impacts at local or regional levels, the applicant should assess the impacts in their ES, which should consider all relevant socio-economic impacts such as those listed in NPS EN-1 paragraph 5.13.4. This includes job creation, the contribution to the development of low carbon industries, additional local services and improvements to local infrastructure, indirect beneficial impacts such as increased income for local supply chains, effects on tourism, effects resulting from the influx of construction workers, and cumulative effects.

8.3.304 In decision making, NPS EN-1 paragraph 5.13.10 states that the Secretary of State may decide to give limited weight to assertions of socio-economic impacts that are not supported by evidence (particularly in view of the need for energy infrastructure).

8.3.305 NPS EN-1 paragraph 5.13.11 provides that the Secretary of State should consider any relevant positive provisions proposed to mitigate impacts and any legacy benefits that may arise.

8.3.306 NPS EN-1 paragraph 5.13.12 adds that an *"employment and skills plan detailing arrangements to promote local employment and skills development opportunities…"* may be included as a Requirement to development consent if the Secretary of State wishes.

8.3.307 Policy W3(1)(a) of the NPPF states, in considering proposals for renewable energy development, substantial weight should be given to *"the benefits of improving energy security, supporting economic development and or the transition to a net zero future"..*

8.3.308 At a local level, the Wiltshire Core Strategy contains policies relevant to socio-economic impacts, which are set out in **ES Volume 1, Chapter 16: Socio-economics, Tourism and Recreation [APP-068]** and appraised further in **Annex B: Local Policy Accordance Tables** to this Planning Statement.

Assessment Conclusions

8.3.309 In line with the requirements of NPS EN-1 paragraph 5.13.2 and 5.13.4, **ES Volume 1, Chapter 16: Socio-economics, Tourism and Recreation [APP-068]** presents the findings of the assessment of likely effects on socio-economics, tourism and recreation as a result of the Scheme in relation to socio-demographic effects, economic effects (employment and GVA), attractions and visitor locations, PRoW, and recreational venues. The assessment conclusions on residual significant effects are listed below for each category. Further, during examination, the Applicant has also specifically considered effects on equine businesses and non-equine businesses as set out in the **Equine Business Report [REP5-105]** and the **Technical Note on Impacts to Non-Equine Businesses [REP5-511]**. Neither of those additional documents alter the conclusions of Chapter 16.

Socio economic: socio demographic effects

8.3.310 During construction, the assessment concludes that inbound workers coming to work on the Scheme from other areas can be adequately accommodated by the private accommodation market without substantially increasing competition and therefore no significant adverse effects are anticipated on the local accommodation market.

8.3.311 The Scheme is likely to produce a modest number of skills and education opportunities during its construction, such as through construction apprenticeships, which is anticipated to result in a medium-term temporary minor beneficial effect (not significant) on skills and qualification attainment.

8.3.312 Socio demographic effects during the operation and maintenance and decommissioning phases of the Scheme are not considered to be significant.

8.3.313 In addition to the embedded mitigation, enhancement measures are proposed and set out in the **Outline SSCEP [REP3-104]** to enhance local education through promoting apprenticeship and training schemes, to promote local recruitment and procurement, and to support agricultural workers in moving to diversified farming practises (such as sheep grazing) which can continue alongside operation of the Scheme. These are anticipated to result in a beneficial but not significant socio-demographic effect.

Socio economic: economic effects (employment and Gross Value Added (GVA))

8.3.314 The Scheme is anticipated to create 268 Full Time Equivalent (FTE) per annum with the estimated on-site construction workforce expected to peak at approximately 692 total employees (gross direct employment) during the construction phase. During operation, 15 permanent jobs would be generated. In a peak replacement scenario, 125 FTE are required and in the decommissioning phase up to a gross of 214 FTE employees per annum are estimated.

8.3.315 The net direct employment generated by the Scheme during construction is anticipated to induce an uplift of £15.7 million Gross Value Added (GVA) per annum within 20 km of the Scheme. The Scheme is anticipated to induce a further uplift of £10.2 million GVA per annum more generally within 20 km of the Scheme, through indirect and induced economic benefits associated with the Scheme's construction. During operation, the net direct employment generated by the Scheme is anticipated to create an uplift of £2.12 million GVA per annum, of which approximately £564,000 GVA per annum is anticipated to be generated within 20 km of the Scheme. A further uplift of £388,000 per annum is anticipated within 20 km of the Scheme as a result of indirect and induced economic benefits resulting from operation of the Scheme. During the peak replacement scenario, the net direct employment from the Scheme is anticipated to generate an uplift of £7.34 million GVA within 20 km of the Scheme, with an additional £2.13 million GVA elsewhere in the UK and indirect and induced economic benefits of £4.77 million per annum within 20 km of the Scheme. During decommissioning, the net direct

employment generated is anticipated to induce an estimated uplift of £12.6 million GVA per annum within 20 km of the Scheme. As a result of decommissioning the Scheme, an uplift of £8.17 million per annum is anticipated as a result of indirect and induced economic benefits within 20 km of the Scheme. Therefore in total, accounting for the number of years at each phase, the Scheme is anticipated to generate an uplift of in excess of £161 million GVA (chained to 2023 value) within 20 km of the Scheme alone (with further benefits nationally).

8.3.316 There is anticipated to be a reduction of up to 20 FTE jobs in the agricultural sector as a result of direct effects on farmers and indirect effects on suppliers. The Scheme's construction is also anticipated to have a negative impact on tourism spending locally, which is estimated could lead to the loss of approximately 50 FTE jobs in the worst-case scenario.

8.3.317 For construction, the uplift in employment as a result of the Scheme is assessed as providing a medium term temporary negligible beneficial effect (not significant). The increase in economic performance locally is also deemed to result in medium term negligible beneficial effects (not significant). For the operation and maintenance and decommissioning phases, no significant effects are anticipated.

Tourism and recreation: attractions and visitor locations

8.3.318 During construction, no significant adverse effects are anticipated in relation to nationally and regionally important tourism destinations (such as the CNL), localised attractions or publicly accessible parks and nature reserves.

8.3.319 Once operational, the Scheme is not anticipated to directly impact upon attractions and visitor locations, including the CNL, and proposed mitigation measures to protect its setting including those set out in the **Outline LEMP [REP6-037]** mean that the overall effect is expected to be not significant.

Tourism and recreation: public rights of way and recreational routes

8.3.320 Adverse residual significant effects on certain PRoWs and a long distance recreational routes are anticipated during construction and decommissioning of the Scheme and during peak replacement activities. The specific residual adverse effects are noted in the summary to this section. However, the overall impact of the Scheme on the 120 individual PRoW routes assessed is not anticipated to result in significant effects during these periods, demonstrating that the Scheme is not anticipated to have an overall significant effect on the local and wider PRoW network.

8.3.321 Additional mitigation measures are provided in the **Outline PRoW and Permissive Path Management Plan [REP1-104]** and **Outline CTMP [REP6-041]** to reduce the level of effect on PRoW and recreational routes. This includes measures targeting driver behaviours and providing banksmen to control sensitive points on HGV routes where there is interaction with PRoW. There are also specific measures for the diversion of footpath WT|GRIT|20 and bridleway WT|MALW|54, where access to Cable Route Corridor works east of Grittleton, and HGV access to Lime Down E are taken respectively. These diversions are proposed to reduce the number of instances in which PRoW users and construction traffic are in conflict, such as crossing points, or using the same route, to ensure PRoW users are not exposed to significant effects on their use of the PRoW or their health and safety. Similar measures will be introduced during replacement activities and during decommissioning.

8.3.322 Further, the proposed enhancements to PRoW, including the provision of 12.8 km of new permissive paths as set out in the **Outline PRoW and Permissive Paths Management Plan [REP1-104]**, will enhance connectivity in the local area and will help to improve recreation in the immediate vicinity, secondarily benefitting local population health and wellbeing in the long term.

Tourism and recreation: recreational venues

8.3.323 During construction and decommissioning, there is anticipated to be a medium term temporary moderate adverse significant effect on Grittleton Village Hall and its use for children and youth groups as a result of increased traffic. No other adverse effects on recreational venues are anticipated during construction and decommissioning and overall, with embedded mitigation, the effect on accessibility of recreational facilities for children and youth groups is assessed as not significant. During operation and maintenance, no significant effects are anticipated.

Residual significant effects

8.3.324 After application of embedded and additional mitigation, some medium term, temporary moderate adverse residual effects are anticipated in relation to:

- PRoW and permissive routes during construction only, namely bridleway WT|MALW|54, Unsurfaced highway, Track crossing railway, Rodbourne, Unsurfaced highway, Track parallel to railway, Rodbourne, due to the direct impacts of cabling works, Lime Down E and increased HGV traffic at road crossings;
- Long distance recreational routes during construction, operation and decommissioning, namely the Fosse Way, Long Path, Palladian

Way and Wiltshire Way, due to impacts from access to Lime Down B, cabling works, potential for short term diversions or closures, immediate views of Lime Down B, C, D and construction compounds, and increased HGV traffic using the route and at road crossings; and

- Equestrian facilities during construction only, namely Park Farm, due to direct impacts from cabling works on the use of equestrian facilities, immediate views of cabling works on hacking routes, and increased HGV traffic on access routes and hacking routes.

Appraisal

8.3.325 The Applicant has carried out an assessment of socio-economic impacts, which has been informed by engagement with relevant local authorities (in accordance with NPS EN-1 paragraph 5.13.3) to understand local and regional issues and opportunities. The consultation carried out is summarised in **ES Volume 1, Chapter 16: Socio-economics, Tourism and Recreation [APP-068]** and includes engagement with the Wiltshire Council's Economic and Regeneration Team and Public Rights of Way Officer, as these represent the host authority on socio-economic, tourism and recreation matters.

8.3.326 The Scheme is considered to accord with all relevant policy having conducted a socio-economic assessment in accordance with NPS EN-1 paragraph 5.13.2, and minimised adverse impacts including through positive measures in compliance with NPS EN-1 5.13.8, the NPPF, and the relevant local policies. With mitigation measures in place, **ES Volume 1, Chapter 16: Socio-economics, Tourism and Recreation [APP-068]** concludes there are no significant effects for all phases of development in relation to socio-economics, tourism and recreation apart from three residual adverse effects in relation to a limited number of PRoWs, recreational routes and an equestrian facility. However, adverse impacts have been minimised as far as possible through embedded and additional mitigation, leaving only medium-term temporary moderate adverse residual effects.

8.3.327 As set out above, the Scheme is anticipated to result in some non-significant beneficial effects in relation to employment, increased local training opportunities, and GVA.

8.3.328 It is considered that socio-economic effects regarding employment, skills and training and economic growth should be afforded limited positive weight, effects on tourism and recreation should be afforded limited negative weight in the planning balance.

Traffic and transport

Planning Policy Context

8.3.329 NPS EN-1 paragraphs 5.14.5 to 5.14.17 set out matters which should inform the applicant's assessment of transport impacts. The ES should include a transport appraisal (NPS EN-1 paragraph 5.14.5) and applicants should consult with National Highways and Highways Authorities as appropriate on the assessment and mitigation to inform the application (NPS EN-1 paragraph 5.14.6). The Applicant should also prepare a travel plan with details of measures to improve access by active, public and shared transport (NPS EN-1 paragraph 5.14.7). The assessment should consider any possible disruption to services such as road, rail and airports (NPS EN-1 paragraph 5.14.8). NPS EN-1 paragraph 5.14.11 sets out possible mitigation measures such as through the consolidation of trips, sustainable modes of transport, and reducing movements in peak travel times. Paragraphs 5.14.13 to 5.14.14 of NPS EN-1 provide that regard should be given to the needs of freight at all stages of the development and the Secretary of State may attach requirements to a consent to control the numbers of HGV movements, make sufficient provision for HGV parking and/or ensure satisfactory arrangements are in place for reasonably foreseeable abnormal disruption.

8.3.330 In decision making, the Secretary of State should ensure that the applicant has sought to mitigate impacts on surrounding transport infrastructure including during the construction phase *"by enhancing active, public and shared transport provision and accessibility*" (NPS EN-1 paragraph 5.14.18). Paragraph 5.14.21 of NPS EN-1 provides that:

"The Secretary of State should only consider refusing development on highways grounds if there would be an unacceptable impact on highway safety, residual cumulative impacts on the road network would be severe, or it does not show how consideration has been given to the provision of adequate active public or shared transport access and provision."

8.3.331 NPPF Policy TR6(4) states that development proposals should be refused if they would have a severe adverse impact on the transport network or an unacceptable impact on highway safety.

8.3.332 2025 NPS EN-1 proposes changes to Part 5.14 on traffic and transport to emphasise that the applicant should adopt a vision-led approach, namely:

- The assessment in the applicant's ES should include a *"vision for transport and an assessment of potential transport impacts",* as opposed to a transport appraisal (2025 NPS EN-1 paragraph 5.14.5); and

- The applicant's travel plan should show how the applicant has adopted a *"vision-led approach"* to identify demand management and monitoring *"and fall-back measures that proactively mitigate transport impacts"*.

8.3.333 Paragraph 2.10.35 to 2.10.39 of NPS EN-3 discusses specific accessibility considerations for solar infrastructure. NPS EN-3 paragraph 2.10.35 states that:

"Applicants will need to consider the suitability of the access routes to the proposed site for both the construction and operation of the solar farm with the former likely to raise more issues."

8.3.334 Paragraph 2.10.36 of NPS EN-3 adds that:

"Access for the delivery of solar arrays and associated infrastructure during construction can be a significant consideration for solar farm siting."

8.3.335 Paragraphs 2.10.120 to 2.10.126 of NPS EN-3 outline considerations for construction including traffic and transport noise and vibration. Paragraph 2.10.123 of NPS EN-3 sets out that:

"Applicants should assess the various potential routes to the site for delivery of materials and components where the source of the materials is known at the time of the application, and select the route that is the most appropriate."

8.3.336 At a local level, the Wiltshire Core Strategy contains policy aimed at reducing the impacts of development on the wider transport network and the environment. Wiltshire Core Strategy Core Policy 42: Standalone Renewable Energy Installations requires Applicants to demonstrate that impacts are satisfactorily assessed, including cumulative effects, on various factors including the local transport network.

8.3.337 The Scheme includes Highways Improvement Areas, 0.15 ha of which falls within the administrative boundary of South Gloucestershire Council. Policy CS36: Proposals for Major Infrastructure Projects of the South Gloucestershire Local Plan: Core Strategy (2013) requires applications for major infrastructure projects to include a comprehensive assessment of transport impacts, with mitigation measures to avoid and reduce harm. Policy LPS14: Nationally Significant Infrastructure Projects and Related Development of South Gloucestershire's Draft Local Plan contains similar wording.

Assessment Conclusions

8.3.338 **ES Volume 1, Chapter 13: Transport and Access [REP4-014]** confirms that, without embedded mitigation, the Scheme has the potential to affect transport and access during the lifecycle of the Scheme through: severance (i.e. the perceived division which is seen to separate people from places, such as difficulties crossing roads, or the physical barrier created by the infrastructure itself); driver delay; delay or loss of amenity to non-motorised users (e.g. users of PRoW); fear and intimidation; road user and pedestrian safety; and hazardous/large loads.

8.3.339 **ES Volume 1, Chapter 13: Transport and Access [REP4-014]** concludes that, with mitigation, the likely effects during the construction phase will be temporary and short term and therefore not result in significant residual effects on transport and access. For the operation and maintenance phase, the residual effects will be negligible and not significant. Where replacement of Solar PV Panels or BESS Containers is required during the operation and maintenance phase, the residual effects of such activities is expected to be less than the residual effects of the construction phase and will also be short term and temporary. For decommissioning, the residual effects will be the same as the residual effects for the construction phase, and will be short term and temporary.

Appraisal

8.3.340 In accordance with paragraph 5.14.5 of NPS EN-1, the Applicant has carried out a transport assessment as reported in **ES Volume 1, Chapter 13: Transport and Access [REP4-014]** and accompanying **ES Volume 3, Appendix 13-1: Transport Assessment [REP6-014]**.

8.3.341 In line with NPS EN-1 paragraph 5.14.5, the Applicant's ES includes an appraisal of impacts on transport at **ES Volume 1, Chapter 13: Transport and Access [REP4-014],** which covers likely impacts on traffic and transport for the whole lifecycle of the Scheme. The Applicant has engaged with National Highways and Wiltshire Council in the preparation of the assessment (as per NPS EN-1 paragraph 5.14.6) and in selecting the most appropriate routes for the Scheme. Key consultation comments are summarised in the chapter and further details on consultation are included in the **Consultation Report [APP-022]**.

8.3.342 **ES Volume 1, Chapter 13: Transport and Access [REP4-014]** and **ES Volume 3, Appendix 13-1: Transport Assessment [REP6-014]** set out the expected vehicle numbers for the construction phase of the Scheme. The total peak traffic flow to/from the Solar PV Sites is expected to be 603 movements (including arrivals and departures for HGVs and cars/LGVs) during a peak day of the construction phase.. During operation and maintenance, there is anticipated to be around 5 visits to each Solar PV

Site per month of maintenance purposes. Replacement activities during the operation and maintenance phase will require higher numbers of vehicles movements, but will generate significantly fewer HGV movements on the local highway network compared to the construction phase of the Scheme. The number of vehicles for the decommissioning phase are not expected to exceed the number set out for the construction phase.

8.3.343 As reported in **ES Volume 3, Appendix 13-1: Transport Assessment [REP6-014],** all points of access have been assessed and designed to accommodate the relevant vehicles that will use them. During the construction phase, banksmen will be provided at the access points to ensure the safe movement of construction vehicles when accessing and exiting the Order Limits.

8.3.344 The Applicant has assessed the impacts of traffic and transport from the Scheme, including the suitability of access roads, active, public or shared transport access, cumulative traffic impacts and opportunities to facilitate PRoW. With embedded mitigation measures, no residual significant effects are anticipated in relation to traffic and transport.

8.3.345 Embedded mitigation has been incorporated into the Scheme design to avoid and reduce impacts and effects on transport and access in accordance with NPS EN-1 and NPS EN-3. The **Outline CTMP [REP6-041]** provides a framework for the management of construction vehicle movements to and from the Scheme, sets out construction access arrangements, construction vehicle routing, construction vehicle trip generation and management/mitigation measures. It also includes details on the requirements for vehicles to transport abnormal indivisible loads (AILs), for larger elements such as transformers. Additional mitigation measures for the construction and operation stages are set out in **ES Volume 1, Chapter 13: Transport and Access [REP4-014]**. A requirement for a Decommissioning Traffic Management Plan (DTMP), to be approved by the local highway authority, will form part of the decommissioning plan and will sit underneath the broader Decommissioning Strategy to be secured through Requirement 20 of the **Draft DCO [REP6-005]**. The DTMP will follow the principles of the **Outline CTMP [REP6-041]**.

8.3.346 The Applicant has prepared a travel plan incorporating options to enhance active, public and shared transport provision and accessibility as required by NPS EN-1 paragraph 5.14.18. An **Outline Construction Worker Travel Plan (CWTP)** has also been prepared as part of the **Outline CTMP [REP6-041]** and will be secured through Requirement 15 in Schedule 2 of the **Draft DCO [REP6-005]**. This includes measures for the provision of shuttle buses to transport construction workers to and from

the Order Limits. This is particularly important for non-local workers, who are expected to stay in local accommodation and be transported to the Order Limits. It will also be utilised by other workers as appropriate. It is expected that the shuttle bus will be able to accommodate 20 workers on average (shuttle buses are likely to be varying size). In addition, workers who drive will be encouraged to car share where possible.

8.3.347 In line with paragraph 5.14.17 of NPS EN-1, the cost of meeting any obligations or requirements is not considered to make the Scheme economically unviable. The Applicant considers, in accordance with paragraph 5.14.19 of NPS EN-1, that the embedded mitigation set out above is sufficient to reduce the impacts of the Scheme on transport infrastructure to acceptable levels.

8.3.348 With regard to the vision-led approach referenced in paragraph 5.14.8 of 2025 NPS EN-1, the **Design Approach Document [APP-268]** explains the Applicant's overall design vision for the Scheme. One of the project Design Principles is to ensure that the Scheme is carefully designed to minimise where practicable impacts on amenity, including traffic impacts, demonstrating that transport impacts have been part of the overall design vision for the Scheme and have shaped its design evolution. In particular, applying the vision-led approach, **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** provides details of the alternative construction routes that have been considered in the Scheme's design evolution of avoid impacts on the CNL, with details of why the route chosen through the CNL is considered to be most appropriate to minimise traffic impacts (in line with NPS EN-3 paragraph 2.10.123).

8.3.349 Regarding suitability of siting, in line with NPS EN-3 paragraph 2.10.36, **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** sets out the Applicant's assessment of the suitability of the Site and other alternatives within a 20 km radius of the Existing National Grid Melksham Substation, which includes an assessment of the traffic and transport constraints and opportunities for each potential site. As set out in the site selection report and confirmed in the more detailed transport assessment for the Scheme at **ES Volume 3, Appendix 13-1: Transport Assessment [REP6-014]**, the Order Limits are considered to be in a suitable location in terms of transport, due to its location near the strategic road network, connected by a number of local roads, which helps to facilitate the movement of construction vehicles to and from the Order Limits. Whilst there is not a significant level of walking, cycling or public transport accessibility in the area, the operational phase of the Scheme generates very few trips.

8.3.350 In compliance with NPS EN-3 paragraph 2.10.141, cumulative effects related to transport and traffic are considered in **ES Volume 1, Chapter**

13: Transport and Access [REP4-014], which confirms that during construction the cumulative effects expected on traffic and transport receptors is not significant

8.3.351 The Scheme therefore demonstrates compliance with the relevant NPSs, the NPPF and local policy and the Applicant considers that traffic and transport should be afforded neutral weight in the planning balance.

Resource and Waste Management

Planning Policy Context

8.3.352 NPS EN-1 Section 5.15 sets out the assessment criteria regarding resource and waste management. Applicants are required to 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 through any relevant demolition, excavation and construction activities (NPS EN-1 paragraph 5.15.8).

8.3.353 NPS EN-1 Paragraph 5.15.9 requires developers to show how they will manage waste sustainably by maximising re-use and recycling, and by setting out waste recovery and disposal plans. They must also assess how the project's waste will affect local waste facility capacity over at least five years of operation.

8.3.354 In decision making, the Secretary of State should *"consider the extent to which the applicant has proposed an effective system for managing hazardous and non-hazardous waste"* for each stage of the development (NPS EN-1 paragraph 5.15.14). As set out in NPS EN-1 paragraph 5.15.15, the Secretary of State should be satisfied that: any such waste will be properly managed, both on-site and off-site; the waste from the proposed facility can be dealt with appropriately by the waste infrastructure; and that adequate steps have been taken to minimise the volume of waste arisings.

8.3.355 2025 NPS EN-1 contains new wording to re-emphasise the importance of the circular economy and to ensure that the applicant demonstrates that the applicant has given consideration to it.

8.3.356 At a local level, Policy WCS5 of the Wiltshire and Swindon Waste Core Strategy 2006-2026 confirms similar aims and requires developers to demonstrate the most sustainable option for waste management has been promoted, in line with the waste hierarchy.

Assessment Conclusions

8.3.357 **ES Volume 1, Chapter 20: Other Environmental Matters [REP5-028]** presents the findings of the assessment of likely effects of the Scheme on

materials and waste for the construction, operation and maintenance and decommissioning phases. The chapter concludes that no residual significant effects are anticipated.

Appraisal

8.3.358 In accordance with NPS EN-1 paragraph 5.15.15, **ES Volume 1, Chapter 20: Other Environmental Matters [REP5-028]** sets out the Applicant's proposals for the management of waste and demonstrates that waste will be properly managed, both on-site and off-site. In particular, waste management measures have been set out in the **Outline SWMP [REP1-102]** for the waste generated by the construction of the Scheme, as required by paragraph 5.15.8 and 5.15.9 of NPS EN-1. This includes a requirement to apply the waste hierarchy, targets for non-hazardous waste recovery and recycling, recording requirements for the transfer of waste, and methods of reporting. The **Outline SWMP [REP1-102]** will be updated by the Principal Contractor into a detailed SWMP prior to commencement of works, as secured through Requirement 19 in Schedule 2 to the **Draft DCO [REP6-005]**. **ES Volume 1, Chapter 20: Other Environmental Matters [REP5-028]** confirms that all waste management will be undertaken in accordance with the relevant regulations (as outlined in **ES Volume 3, Appendix 20-2: Materials and Waste Legislation, Policy and Guidance [APP-259]**) and waste would be transported by licensed waste hauliers to waste management sites which hold the necessary regulatory authorisation and/or permits for those wastes consigned to them. The **Outline SWMP [REP1-102]** also sets out good practice measures which go beyond statutory compliance, including measures such as the safe sealing and storage of hazardous materials on site, in accordance with NPS EN-1 paragraph 5.15.13. For decommissioning, the relevant measures for the management of waste are set out in the **Outline Decommissioning Strategy [REP6-033],** to be secured by Requirement 20 in Schedule 2 of the **Draft DCO [REP6-005].**

8.3.359 Further, in accordance with NPS EN-1 paragraph 5.15.15, the Applicant has demonstrated that the waste from the proposed facility can be dealt with appropriately by the waste infrastructure. **ES Volume 1, Chapter 20: Other Environmental Matters [REP5-028]** provides that with embedded mitigation measures in place, the quantities of waste to be disposed of to landfill are anticipated to be below 1% of regional inert and non-hazardous landfill capacity and less than 0.1% of national hazardous landfill capacity. Therefore, the magnitude of impact is negligible and not significant. During operation, waste generation is expected to be negligible, as solar PV panels do not generate any direct waste as part of the energy production process, however, there will be a need to periodically replace some or all of the electrical infrastructure. It is likely that the solar PV panels and battery waste generated by the Scheme, during operation and

maintenance and decommissioning phases, would be managed by specialist regional or national facilities; these facilities would be developed over the operation and maintenance phase of the Scheme in response to demand generated by the UK-wide solar energy industry. The overall quantities of operational and decommissioning waste to be disposed of to landfill are anticipated to be below 1% of regional inert and non-hazardous landfill capacity, and less than 0.1% of national hazardous landfill capacity. Therefore, the magnitude of impact is negligible, and the effect is slight, which is considered to be not significant.

8.3.360 In relation to minimising the volume of waste arisings from both hazardous and non-hazardous waste (as required by NPS EN-1 paragraph 5.15.14 and 5.15.15), **ES Volume 1, Chapter 20: Other Environmental Matters [REP5-028]** and the **Outline SWMP [REP1-102]** provide that excavated material reuse of suitable excavated materials on-site would be determined via a Materials Management Plan (MMP), developed post-consent in accordance with the Contaminated Land: Applications in Real Environments Definition of Waste: Development Industry Code of Practice (CL:AIRE DoW CoP) (Ref-55), exemption from a permit or an environmental permit.

8.3.361 As demonstrated above, the Applicant has met the requirements of NPS EN-1 in relation to the management of waste and materials and it is considered that it should be afforded neutral weight in the planning balance.

Water Quality and Resources

Planning Policy Context

8.3.362 NPS EN-1 paragraph 5.16.2 provides that during the construction, operation and decommissioning phases, development can lead to increased demand for water, involve discharges of water, and cause adverse ecological effects resulting from physical modifications to the water environment. It also highlighted the increased risk of pollutants entering the water environment, which could lead to adverse impacts on human health or the environment.

8.3.363 Where the project is likely to have effects on the water environment, NPS EN-1 paragraph 5.16.3 requires that the applicant undertake:

"An assessment of the existing status of, and impacts of the proposed project on water quality, water resources and physical characteristics of the water environment and how this might change due to the impact of climate change on rainfall patterns and consequently water availability across the water environment, as part of the ES or equivalent."

8.3.364 NPS EN-1 Paragraph 5.16.7 sets out the criteria for assessment in further detail, requiring consideration of any impacts non water bodies or protected areas under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017, source protection zones around potable groundwater abstractions and consideration of any cumulative effects.

8.3.365 NPS EN-1 paragraph 5.16.8 requires the Secretary of State to consider whether mitigation measures are needed over and above those that are included in the application and that a construction management plan may help codify mitigation. Consideration of the design of the Scheme to reduce impacts on the water environment is included in Paragraph 5.16.9 which states impacts can be minimised through *"careful design to facilitate adherence to good pollution control practice."*

8.3.366 In decision making, NPS EN-1 paragraph 5.16.11 acknowledges that activities that discharge to the water environment are subject to pollution control and confirms that NPS Part 4.12 is applicable to decision-making. In short, this means that the Secretary of State should work on the assumption that the relevant pollution control regime will be properly applied and enforced by the relevant regulator (NPS EN-1 paragraph 4.12.10). The Secretary of State should not refuse consent on the basis of pollution impacts unless there is good reason to believe that any necessary operational pollution control permits, licences or other consents will not subsequently be granted (NPS EN-1 paragraph 4.12.16).

8.3.367 NPS EN-1 paragraph 5.16.12 provides that:

"The Secretary of State will need to give impacts on the water environment more weight when the project would have an adverse effect on the achievement of the environmental objectives established under the Water Framework (Water Framework Directive) (England and Wales) Regulations 2017."

8.3.368 NPS EN-1 paragraph 5.16.14 provides that the Secretary of State must refuse consent where a project is likely to cause deterioration of a water body or its failure to achieve good status or good potential, unless the requirements set out in Regulation 19 of the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 are met.

8.3.369 The Secretary of State should be satisfied the proposal has regard to current River Basin Management Plans (NPS EN-1 paragraph 5.16.14) and other plans such as Water Resources Management Plans (NPS EN-1 paragraph 5.16.15).

8.3.370 Paragraphs 2.10.85 and 2.10.87 of NPS EN-3 recommend the use of sustainable drainage systems and avoiding the use of culverts.

8.3.371 At a local level, the Wiltshire Core Strategy contains policy aimed at protecting the water environment, specifically Core Policy 68: Water Resources which contains provisions requiring development not to prejudice any relevant River Basin or Catchment Management Plan, to incorporate water efficiency measures, and to assess and protect groundwater resources. Assessment Conclusions

8.3.372 **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012]** reports on the assessment of likely effects on the water environment as a result of the Scheme, including risks associated with surface water and drainage. It concludes that, with the embedded mitigation and additional mitigation outlined in Chapter 11, and the measures described in the **Outline CEMP [REP6-029]** and **Outline Decommissioning Strategy [REP6-033]**, no significant residual effects are anticipated during the construction, operation and maintenance and decommissioning phases of the Scheme.

Appraisal

8.3.373 In compliance with NPS EN-1 paragraphs 5.16.3 and 5.16.7 the Applicant has undertaken an assessment of the likely effects on the water environment as reported in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012]** including of the impacts on water quality, water resources, the characteristics of the water environment, the impact of climate change, and any cumulative effects. The **Outline Water Resources Strategy [APP-290]** provides an early-stage evaluation of quantities of water required for the Scheme during the construction and operation and maintenance phases, and where the Applicant is likely to resource these demands.

8.3.374 The Applicant has also assessed the likely effects of the Scheme on water quality and resources to ensure its compliance with the relevant pollution control regime. With embedded and additional mitigation, no residual significant effects on water quality and resources are anticipated, therefore in accordance with NPS EN-1 paragraph 5.16.8 the Applicant does not consider that further mitigation measures are necessary, over and above those which form part of the application. The mitigation measures embedded into the design of the Scheme, and additional mitigation proposed, demonstrate how impacts on the water environment have been considered and reduced through careful design and adherence to good pollution control practice, in accordance with NPS EN-1 paragraph 5.16.9.

8.3.375 The additional mitigation proposed is intended to address the potential for the pollution of surface water runoff in the case of a battery fire, and to provide a temporary drainage system for the construction stage to

address the temporary increase in impermeable construction areas such as around the substation and BESS Area.

8.3.376 With regard to the potential for pollution runoff in the case of battery fire, **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012]** sets out the proposed mitigation measures including the use of local bunding and attenuation, to be incorporated into the BESS Area, which would allow fire water to be contained in gravel filled attenuation basins, where it will be tested for pollutants and either treated and released into the local drainage network or tankered off site as necessary. Local fire water provision will also be included within the BESS Area in line with NFCC Grid Scale Battery Energy Storage System planning guidance (Ref-49), to be used for cooling the boundary to reduce the risk of fire spreading. The Applicant has consulted with Dorset & Wiltshire Fire and Rescue Service during pre-application and Statutory Consultation to inform the design of the BESS Area and engagement will continue across the project lifecycle. Further, an Emergency Response Plan will be finalised with the local fire service at detailed design stage and will reflect any updated NFCC guidance. These control measures are set out further in the **Outline Battery Safety Management Plan (BSMP) [REP3-106]**.

8.3.377 Construction within the Cable Route Corridor will include several watercourse crossings which are described and mapped within **ES Volume 3, Appendix 11-9: FRA and Drainage Strategy - Lime Down Cable Route Corridor [REP3-063]**. Cable installation will involve multiple crossings of watercourses, including both Main Rivers and ordinary watercourses. These crossings relate specifically to the cable installation works. Horizontal Directional Drilling (HDD), open cut trenching, or other suitable techniques may be employed depending on site-specific conditions, including ecological sensitivity, ground conditions and flood risk. The final method for each crossing will be selected based on environmental, engineering and permitting considerations, with appropriate mitigation implemented to manage potential impacts.

8.3.378 In compliance with NPS EN-1 paragraph 5.16.12 and paragraph 5.16.14, a **Water Framework Directive (WFD) Assessment [REP1-094]** has been undertaken and concludes that, with the embedded and additional mitigation measures proposed, all identified effects on WFD designated waterbodies have been reduced to levels assessed as negligible or minor adverse. No residual effects are considered likely to result in deterioration of waterbody status or to prevent the achievement of relevant environmental objectives set out in the Severn River Basin Management Plan. On that basis, the Scheme is compliant with the objectives of the WFD.

8.3.379 With regard to the Scheme's impact on water resources, an **Outline Water Resources Assessment [APP-290]** has been undertaken to provide an early-stage evaluation of quantities of water required for the Scheme during construction and operation, and the likely resource for these demands. The assessment considers possible water supply from mains water, water tankering, borehole water and surface water (watercourses and runoff), and concludes that the water requirements of the Scheme can be appropriately met via a mains water connection in Lime Down A (which has been confirmed by Bristol Water) or water tankering.

8.3.380 In summary, the Scheme demonstrates compliance with NPS EN-1, local planning policy, and the objectives of the WFD. Through implementation of embedded and additional mitigation no residual adverse significant effects are anticipated. It is therefore considered that impacts on water quality and resources should be afforded neutral weight in the planning balance.

Mineral Safeguarding

Planning Policy Context

8.3.381 NPS EN-1 paragraph 5.11.19 provides that applicants:

"Should safeguard any mineral resources on the proposed site as far as possible, taking into account the long-term potential of the land use after any future decommissioning."

8.3.382 In decision making, 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 (NPS EN-1 paragraph 5.11.28).

8.3.383 The NPPF equally recognises the importance in protecting minerals as a finite natural resource and Policy M6 of the NPPF advises local planning authorities to avoid permitting other development proposals in Mineral Safeguarding Areas (MSA) if it might constrain future mineral extraction.

8.3.384 At a local level, the Wiltshire and Swindon Minerals Core Strategy Development Plan Document (June 2009) and the Materials and Waste Development Control Policies Development Plan Document (September 2009) set out the relevant core objectives and specific policies regarding minerals safeguarding including the creation of Minerals Resource Zones (MRZs) (i.e. preferential areas where developments for sand and gravel extraction should be located) and MSAs (i.e. areas of viable mineral resources which should be safeguarded from development, except as permitted by policy).

8.3.385 Policy MDC4 of the Wiltshire and Swindon Minerals Development Control Policies Development Plan Document (September 2009) provides that proposals within MSAs that may prevent or adversely affect current of possible future mineral extraction will be opposed unless:

- An appropriate quantity of the mineral can be extracted prior to or in phase with the development;
- It can be proven that the mineral deposit is unlikely to be worked due to its quality or quantity;
- The development is temporary in nature and the site can be restored to a condition that does not inhibit extraction; or
- There is an overriding need for the proposed non-minerals development to commence without delay.

Assessment Conclusions

8.3.386 The Applicant's assessment of the Scheme's effect on mineral resources is contained within **ES Volume 1, Chapter 20: Other Environmental Matters [REP5-028]**. It confirms that the likely impact on mineral resources identified within the Order Limits is moderate/minor and not significant. Following the implementation of embedded mitigation, no significant residual effects have been identified.

Appraisal

8.3.387 There are no identified MRZs or MSAs within the Solar PV Sites.

8.3.388 The Cable Route Corridor affects two peripheral areas of the Bristol Avon Valley MRZ and MSA which cover approximately 3.7 ha in total. Paragraph 1.9 of the Wiltshire and Swindon Aggregate Minerals Site Allocations Plan (May 2013) acknowledges that the sand and gravel deposits in the Bristol Avon MRZ are typically shallow and of poorer quality than elsewhere in Wiltshire. The plan goes on to add that the minerals industry has indicated they are not keen to move to this area in the foreseeable future unless market conditions dictate otherwise.

8.3.389 The Cable Route Corridor passes through a MSA identified for building stone between Corsham and Whitley. The affected area extends to 27.2 ha. Within this MSA, the Cable Route Corridor also crosses the permitted area of Monks Park Mine, where oolitic limestone is worked for building stone. The Cable Route Corridor affects approximately 10.4 ha of the permitted area although the mine entrance, associated yard and vehicular access lie outside the Cable Route Corridor. The Monks Park Mine has inactive since 2017, with the majority of extractions ending in 2006.

8.3.390 As set out in **ES Volume 1, Chapter 20: Other Environmental Matters [REP5-028],** embedded mitigation has been incorporated into the Scheme design and construction to avoid and reduce impacts and effects on mineral resources. In particular:

- The **Outline CEMP [REP6-029]** sets out construction methods to protect minerals, including limiting the depth of trenching of the Grid Connection Cables to be no more than 2 m below the surface within the areas of the relevant MSA and Monks Park Mine. Use of appropriate equipment and reporting requirements are also included; and
- The **Outline Decommissioning Strategy [REP6-033]** sets out measures for the removal of plant and structures at the end of the Scheme's life, to ensure that the site is restored in a manner that does not prevent future extraction of minerals.

8.3.391 No significant residual effects on minerals have been identified in the ES, and the Scheme is considered to meet the test in policy MDC4 of the Wiltshire and Swindon Minerals Development Control Policies Development Plan Document (September 2009) because:

- The Cable Route Corridor for the Scheme affects only limited sections of the identified MRZ and MSAs;
- The building stone deposit at the MSA between Corsham and Whitley (also comprising Monks Park Mine) is at a depth which would be unaffected by installation of the Grid Connection Cables;
- Regarding the sand and gravel deposits found at the Bristol Avon Valley MRZ and MSA, the mineral resource is acknowledged to be of poorer quality, and the periphery of the deposits is already highly constrained by existing land uses to the extent that the mineral is not considered to be available to be worked;
- The Scheme is temporary in nature. Upon completion of the decommissioning phase, all surface development associated with the Scheme would be removed. Any below ground infrastructure that is left in situ is not anticipated to present a significant constraint to future mineral extraction and could be removed as part of any future mineral working; and
- As established by **Section 5.2** of this Planning Statement and the **Statement of Need [REP1-085],** there is an overriding need for the Scheme to commence without delay. Solar infrastructure such as the Scheme has been identified as CNP infrastructure in NPS EN-1, because such infrastructure is urgently required for both energy security and to meet the UK's legally binding 2050 net zero target.

Therefore, it is considered that the overriding need for the Scheme outweighs any minor impact it might have on the identified MRZ and MSAs.

8.3.392 In summary, it is considered that the Scheme satisfies national and local policy regarding minerals safeguarding and that minerals should be afforded neutral weight in the planning balance.

Glint and Glare

Planning Policy Context

8.3.393 NPS EN-3 paragraph 2.10.102 highlights the potential for solar panels to create glint (being a momentary flash of light that may be produced as a direct reflection of the sun in the solar panel) and glare (being a continuous source of excessive brightness experienced by a stationary observer). NPS EN-3 paragraphs 2.10.103 – 2.10.106 set out requirements for applicants to assess glint and glare.

8.3.394 In decision making, paragraph 2.10.158 provides that:

"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)."

8.3.395 NPS EN-3 paragraph 2.10.159 recognises that there is no evidence that glint and glare from solar farms results in significant impairment on aircraft safety, and unless significant impairment can be demonstrated the Secretary of State is unlikely to give any more than limited weight to claims of aviation interference as a result of glint and glare.

Assessment Conclusions

8.3.396 **ES Volume 1, Chapter 20: Other Environmental Matters [REP5-028]** concludes that no residual significant effects in relation to glint and glare are anticipated following the implementation of embedded and additional mitigation.

Appraisal

8.3.397 In accordance with NPS EN-3, the Applicant has carried out an assessment of glint and glare as set out in **ES Volume 1, Chapter 20: Other Environmental Matters [REP5-0281].** As well as fixed panels, the assessment accounts for single axis tracking panels (in compliance with NPS EN-3 paragraph 2.10.105, which specifically mentions tracking panels because they can cause differential diurnal and/or seasonal impacts), on the basis that these are included within the EIA assessment parameters of the Scheme.

8.3.398 In compliance with NPS EN-3 paragraph 2.10.158, the Applicant has assessed potential impacts on nearby homes, roads, PRoW, rail and aviation infrastructure. The assessment concludes that, following implementation of embedded and additional mitigation, there are no residual significant effects anticipated for all receptors assessed.

8.3.399 Embedded mitigation has been incorporated into the Scheme design to, as far as practicable, avoid and reduce the effects of glint and glare, including setbacks from dwellings where possible, and the incorporation of anti-reflective coating on the solar PV panels. Additional mitigation is also incorporated into the **Outline LEMP [REP6-037]** in the form of vegetative screening, to be secured by Requirement 7 in the **Draft DCO [REP6-005]**, to remove any significant impact identified to the receptors outlined in **ES Volume 1, Chapter 20: Other Environmental Matters [REP5-028].**

8.3.400 In summary, the Scheme complies with the provisions of NPS EN-3 and it is considered that the effects of glint and glare should be afforded neutral weight in the planning balance.

Cumulative Impacts

Planning Policy Context

8.3.401 NPS EN-1 paragraph 4.1.5 provides that, when weighing the adverse impacts of a proposal against its benefits, the Secretary of State should take into account *"cumulative adverse impacts"* in its decision making. NPS EN-1 paragraph 4.2.12 confirms that, in regard to residual impacts:

"The cumulative impacts of multiple developments with residual impacts should also be considered."

8.3.402 Further, paragraph 4.3.3 of NPS EN-1 confirms that the EIA Regulations require that the assessment of the likely significant effects of a proposed development also covers cumulative effects. Policy in NPS EN-1, on the generic impacts and how these should be assessed and then factored into decision making, also sets out when and how cumulative impacts should be assessed for each of the generic impacts.

8.3.403 NPS EN-3 contains similar policy specific to solar infrastructure. Paragraph 2.10.26 of NPS EN-3 provides that:

"Applicants should consider the cumulative impacts of situating a solar farm in proximity to other energy generating stations and infrastructure."

8.3.404 NPS EN-5 reiterates the policy positions of NPS EN-1 and NPS EN-3, confirming the need to consider cumulative impacts within the ES and this being an overall consideration as part of the planning balance exercise.

8.3.405 At a local level, Core Policy 42 of the Wiltshire Core Strategy states that standalone renewable energy installations:

"Need to demonstrate how impacts… have been satisfactorily assessed, including any cumulative effects."

Assessment Conclusions

8.3.406 **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-073]** addresses the potential for cumulative and in combination effects as a result of the Scheme. 'Cumulative effects' mean where there is the potential for two or more developments that are reasonably foreseeable and/or consented, but not yet forming part of the baseline environment, within close enough proximity to the Scheme to lead to significant cumulative effects on the same receptor. 'In-combination effects' are the combined effect of individual impacts from the Scheme, which have been identified as part of the assessments reported within **ES Chapters 7 to 20 [EN010168/APP/6.1]** that are considered likely to result in a new or different likely significant effect, or an effect of greater significance, than any one of the impacts on their own.

8.3.407 Regarding In-combination effects, Table 21-7 of **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-073]** sets out an assessment of potential in-combination effects and confirms that for each potential in-combination effect identified, the effect interaction is not expected to increase the significance of effects predicted in the Environmental Statement and therefore no additional mitigation is required.

8.3.408 Regarding cumulative effects, Table 21-9 of **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-073]** summarises the assessment of potential cumulative effects with the nearby developments identified in Table 21-5: Short List of Developments (also within **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-073]).** It concludes that, taking a conservative worst-case approach, significant cumulative effects with the short list of developments are identified at a limited and discrete number of receptors comprising tourism and recreation impacts during the construction phase for example, on Corsham Park, PRoW WT|CORM|122, WT|HULL|29, and Sustrans Cycle Route 403, and on skylark at a District level. Where possible, inter project communication will take place to minimise tourism and recreation effects, for example through the co-ordination of construction planning and construction vehicle deliveries and routes. In terms of the cumulative significant adverse effects in relation to skylarks, this is on the basis that the adverse effects anticipated as a result of the Scheme may be compounded by the nearby proposed development 18/08271/OUT (an

outline application relating to Hullavington Airfield for up to 44,150 sq.m. of development space including research and office floorspace and ancillary development). However, as 18/08271/OUT is an outline planning application, full details of the mitigation measures proposed in relation to skylarks is yet to be provided and an application has not yet been made to discharge the relevant conditions of the outline planning permission (condition 1 relating to landscaping and layout and condition 8 regarding compliance with the ecological assessment). Given the lack of detail available regarding the proposals for skylark mitigation within 18/08271/OUT so far, a conservative approach has been adopted to the identification of potential residual cumulative effects on skylark for EIA purposes. However, as and when further details of mitigation are proposed in any application to discharge the relevant conditions of 18/08271/OUT (which would be required before any development could take place), the effect is likely to be reduced to not significant.

Appraisal

8.3.409 In compliance with NPS EN-1 paragraph 4.3.3 as assessment of likely significant cumulative effects has been carried out as part of the EIA for the Scheme. The assessment of likely cumulative effects is provided in each of the topic chapters of the **ES [EN010168/APP/6.1]** and is summarised in **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-073]**. This concludes that no significant in-combination effects are anticipated in relation to the Scheme. Regarding cumulative effects, taking a conservative worst-case approach, significant cumulative effects are identified at a limited and discrete number of receptors comprising tourism and recreation impacts and impacts to skylark. However, it must be noted that these significant cumulative effects have only been identified during the construction phase and do not continue into the operation of the Scheme. Accordingly, significant cumulative effects are limited to the short-term. Furthermore, inter project communication will take place to minimise tourism and recreation impacts whilst the impact to skylark is likely to reduce to not significant as and when skylark mitigation is proposed for 18/08271/OUT in any discharge of condition application. The Scheme therefore demonstrates compliance with NPS EN-1 paragraph 4.3.3, and NPS EN-3 paragraph 2.10.26. In line with NPS EN-1 paragraph 4.1.5. Given significant adverse effects are anticipated, albeit in the short term only, it is considered that cumulative effects should be afforded limited negative weight in the planning balance.

9 Decision-making and Planning Balance

9.1 Introduction

9.1.1 The determination of this DCO application will be made in accordance with Section 104 of the PA 2008. The following section sets out the relevant sections of the PA 2008 with regard to decision making, the application of the planning balance taking account of the positive, neutral and negative impacts of the Scheme, and finally applies the CNP presumption.

9.2 Section 104(2) of the PA 2008

9.2.1 Section 104(2) of the PA 2008 provides that, in deciding an application for development consent, the Secretary of State must have regard to:

- Any relevant NPS: the relevant NPSs for the Scheme are NPS EN-1, NPS EN-3 and NPS EN-5. **Section 8** and **Annex A: National Policy Accordance Tables** of this Planning Statement demonstrate the Scheme's compliance with the NPSs;
- Any appropriate marine policy documents: none are relevant for the Scheme;
- Local impact reports: local impact reports are expected to be prepared by the host authorities and submitted into the Examination at the appropriate time;
- Prescribed matters: the relevant prescribed matters are Regulations 3 and 7 of the Infrastructure Planning (Decisions) Regulations 2010 which have been addressed in the planning appraisal sections regarding biodiversity and historic environment above; and
- Any other matters which the Secretary of State thinks are both important and relevant to the Secretary of State's decision: for example, policies within the local development plan. **Annex B: Local Policy Accordance Tables** demonstrates the Scheme's compliance with the relevant local policies.

9.3 Section 104(3) of the PA 2008

9.3.1 Section 104(3) of the PA 2008 provides that:

"Applications for development consent must be decided by the Secretary of State in accordance with any relevant NPS except to the extent that one of more of subsections 104(4) to 104(8) apply."

9.3.2 There are no exceptions in sections 104(4) to 104(8) that apply to the Scheme because there is no evidence that:

- in deciding the DCO for the Scheme in accordance with any relevant NPS would lead to the UK being in breach of any of its international obligations (section 104(4));
- Deciding the application in accordance with the relevant NPSs would lead to the Secretary of State being in breach of any duty imposed by the Secretary of State by or under any enactment (section 104(5));
- Deciding the application in accordance with any relevant national policy would be unlawful by virtue of any enactment (section 104(6));
- The adverse impacts of the Scheme would outweigh its benefits (section 104(7)). This Planning Statement sets out how the adverse impacts of the Scheme are outweighed by the substantial benefits; and
- There are any conditions relevant to the Scheme which are prescribed for deciding the application otherwise in accordance with a NPS (section 104(8)).

9.4 Planning Balance

9.4.1 NPS EN-1 paragraph 4.1.3 provides that, given the level and urgency of need for energy infrastructure, there will be a presumption in favour of granting consent to applications for energy NSIPs, unless any more specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused. Therefore, it is still necessary to apply the planning balance to determine whether any specific policy tests indicate that consent should be refused, with the need to weigh adverse impacts against benefits overall.

9.4.2 Paragraph 4.1.5 of NPS EN-1 sets out how the Secretary of State, when making a decision, will weigh a project's *"adverse impacts against its benefits"*.

9.4.3 The glossary to NPS EN-1 sets out that the hierarchy of weight is defined as 1) limited 2) moderate 3) great 4) significant and 5) substantial.

9.4.4 The following paragraphs summarise the outcomes of the planning appraisal at **Section 8** of this Planning Statement, applying the hierarchy of weight.

Positive Impacts

9.4.5 In line with the legally binding targets to reach net zero by 2050, the Scheme will make a substantial positive contribution to meeting the urgent need for renewable electricity generation as established in NPS EN-1 and

would help to ensure security of supply for the country. On that basis, it is considered that the need for renewable energy infrastructure, and the contribution the Scheme would make to electricity generation and security of supply should be afforded substantial positive weight in the planning balance.

9.4.6 Linked to the above, the Scheme would result in GHG emissions savings over its lifetime as a result of the low carbon renewable electricity that will be generated during the operational phase. This far outweighs the GHGs and impacts on climate change that are anticipated in the construction, operation and decommissioning of the Scheme. On that basis, it is considered that climate change and GHG emissions should be afforded substantial positive weight in the planning balance. It is acknowledged by the Applicant that, if the Scheme was operational for 40 years instead of 60, both the GHG emissions and the amount of energy generated during the operational life of the Scheme would be lower (see **Written Summary of the Applicant's Oral Submissions and Responses at ISH1 [REP1A-012] and Climate Response to Wiltshire Council Appendix B of Written Rep and SLD Appendix J1 [EN010168/EXAM/9.33])**. However, the Applicant considers that assessing a 60 year operational period represents the reasonable worst case scenario for GHG emissions. Further, with a 40 year operation period, there would still be a net saving over the Scheme's lifetime.

9.4.7 Further, the Scheme is committed to delivering ecological enhancements and net gain by providing a minimum of 10% BNG in habitat units, hedgerow units and watercourse units during its lifetime, secured via Requirement 9 in the **Draft DCO [REP6-005]**. The **BNG Assessment Report [EN010168/EXAM/7.8 as updated for Deadline 7]** indicates that BNG in excess of 10% will be achieved, with a total net gain of 65.35% for area habitat units, 19.39% for hedgerow units and 25.30% for watercourse units in relation to the Solar PV Sites. The total net gain for the whole Scheme (i.e. Solar PV Sites and Cable Route Corridor combined) is 37.64% for area habitat units, 12.77% for hedgerow units and 19.89% for watercourse units. Whilst two residual significant adverse effects are identified during the construction and decommissioning phases in relation to hedgerows and 'breeding birds - ground nesting birds of open habitat', these adverse effects are limited to the site and local level and are far outweighed by the residual significant beneficial effects anticipated in relation to habitats and other species, together with the overwhelming need for and other benefits of the Scheme. On that basis, it is considered that the overall effects on biological conservation should be given moderate positive weight in the planning balance and that BNG should be afforded moderate positive weight.

9.4.8 The Scheme will enhance and improve connectivity in line with NPS EN-1 and the project design principles through the creation of 12.8 km of new permissive paths, which will be open up to 365 days per calendar year throughout the proposed 60-year operational lifetime of the Scheme. It is therefore considered that permissive paths should be afforded substantial positive weight in the planning balance. Note that, from a visual and socio-economic perspective, some residual adverse effects on PRoW and long-distance recreational routes have been identified. These are assessed separately as a negative impact on visual and tourism and recreation below.

9.4.9 The Scheme is anticipated to create 268 Full Time Equivalent (FTE) per annum with the estimated on-site construction workforce expected to peak at approximately 692 total employees (gross direct employment) during the construction phase. During operation, 15 permanent jobs would be generated. In a peak replacement scenario, 125 FTE are required and in the decommissioning phase up to a gross of 214 FTE employees per annum are estimated. Job creation provides employment and skills benefits and further enhancement measures are proposed and set out in the **Outline SSCEP [REP3-104]** to enhance local education through promoting apprenticeship and training schemes, to promote local recruitment and procurement, and to support agricultural workers in moving to diversified farming practises (such as sheep grazing) which can continue alongside operation of the Scheme. It is considered that job creation and employment and skills training should be afforded limited positive weight in the planning balance.

9.4.10 In addition to job creation and skills training, the Scheme is anticipated to generate a total uplift of in excess of £161 million GVA (chained to 2023 value) over its lifetime within 20 km of the Scheme alone (with further benefits nationally). It is considered that the GVA generated by the Scheme should be afforded limited positive weight in the planning balance.

Neutral Impacts

9.4.11 The following topics set out in EN-1 and assessed in the ES confirm there will be no significant effects from the Scheme, demonstrate general compliance with the relevant planning policies, and are therefore considered to have neutral weight in the planning balance:

- Air Quality **(ES Volume 1, Chapter 15: Air Quality [REP2-008])**;
- Woodland **(ES Volume 1, Chapter 10: Arboriculture [APP-062])**;
- Flood Risk and Drainage **(ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012])**;

- Historic Environment **(ES Volume 1, Chapter 12: Cultural Heritage [REP3-135])**;
- Soils **(ES Volume 1, Chapter 17: Soils and Agriculture [REP3-021])**;
- Noise and Vibration **(ES Volume 1, Chapter 14: Noise and Vibration [REP5-024])**;
- Traffic and Transport **(ES Volume 1, Chapter 13: Transport and Access [REP4-014])**;
- Resource and Waste Management **(ES Volume 1, Chapter 20: Other Environmental Matters [REP5-028])**;
- Water Quality and Resources **(ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012])**;
- Ground Conditions **(ES Volume 1, Chapter 19: Ground Conditions [REP5-026])**;
- Glint and Glare **(ES Volume 1, Chapter 20: Other Environmental Matters [REP5-028])**;
- Civil Aviation and Defence Interests **(ES Volume 1, Chapter 20: Other Environmental Matters [REP5-028])**;
- Battery Safety **(ES Volume 1, Chapter 20: Other Environmental Matters [REP5-028])**; and
- Human Health **(ES Volume 1, Chapter 18: Human Health [APP-070])**.

Negative Impacts

9.4.12 The Scheme is anticipated to result in a combination of significant beneficial and significant adverse landscape and visual effects. There is a significant beneficial effect on the landscape fabric as a result of the Scheme, but adverse landscape effects within the 1 km study area due to the change in land use and adverse visual effects to some receptors. Parts of the Scheme are within the setting of the CNL, however the Scheme is barely discernible from within the CNL and there are no significant effects on the special qualities of the CNL as a result of the Scheme. Given the outcome of the landscape and visual impact assessment, which concludes both beneficial and adverse landscape effects, on balance it is considered that landscape effects should be afforded moderate negative weight in the planning balance. As to visual effects, the landscape and visual impact assessment concludes that there will be significant adverse visual effects on 10 PRoW throughout the

lifetime of the Scheme, where mitigation is not appropriate as it would not accord with the long-term landscape character and legacy landscape. It is therefore considered that visual effects should be afforded moderate negative weight in the planning balance. Therefore, overall, it is considered that landscape and visual impacts should be afforded moderate negative weight in the planning balance.

9.4.13 Whilst there is a potential for some agricultural practices to continue, it is acknowledged that there would be a temporary removal of BMV agricultural land from use for the 60 year lifetime of the Scheme. This effect would be both temporary and reversible and soil resource would improve over the lifetime of the Scheme due to its removal from intensive agriculture. Further, for the reasons set out in the planning appraisal, it is considered that the use of BMV agricultural land can be justified. However, in acknowledgement of the temporary removal of BMV land from agriculture, it is considered that agricultural land should be afforded moderate negative weight in the planning balance.

9.4.14 From a socio-economic perspective, some temporary residual adverse effects are anticipated in relation to tourism and recreation due to effects on a PRoW, some recreational routes and an equestrian facility. However, adverse impacts have been minimised as far as possible through embedded and additional mitigation, leaving only medium-term temporary moderate adverse residual effects. It is considered that tourism and recreation should be afforded limited negative weight in the planning balance.

9.4.15 In relation to PRoW specifically, due to the visual and socio-economic impacts anticipated in relation to PRoW, it is considered that PRoW should be afforded moderate negative weight in the planning balance when considered in isolation. However, on the basis that the visual and socio-economic effects on PRoW have already been considered in the wider weightings above for visual effects and effects on tourism and recreation, this weighting should not be double counted.

Cumulative Impacts

9.4.16 The assessment of likely cumulative effects is provided in each of the topic chapters of the **ES [EN010168/APP/6.1]** and is summarised in **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-073]**. This concludes that no significant in-combination effects are anticipated in relation to the Scheme. Regarding cumulative effects, taking a conservative worst-case approach, significant cumulative effects are identified at a limited and discrete number of receptors comprising tourism and recreation impacts and impacts to skylark. However, it must be noted that these significant cumulative effects have only been identified during the construction phase and do not continue into the operation of the

Scheme. Accordingly, significant cumulative effects are limited to the short-term. Furthermore, inter project communication will take place to minimise tourism and recreation impacts whilst the impact to skylark is likely to reduce to not significant as and when skylark mitigation is proposed for 18/08271/OUT in any discharge of condition application. Therefore, it is considered that cumulative effects should be afforded limited negative weight in the planning balance.

Summary of planning balance

9.4.17 Taking the above factors into account and having regard to all important and relevant matters, it is concluded that there are no adverse impacts of sufficient weight, either on their own or collectively, that would mean the DCO should not be made. The adverse impacts identified are clearly outweighed by the substantial public benefits that would arise from the provision of low carbon energy to meet the need identified in NPS EN-1.

9.5 CNP Infrastructure

9.5.1 NPS EN-1 paragraph 4.2.5 confirms that solar development is considered to be CNP infrastructure and therefore the CNP presumption set out in NPS EN-1 paragraph 3.3.63 applies to this Scheme. This states that:

"Subject to any legal requirements, the urgent need for CNP Infrastructures 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 the application of the mitigation hierarchy."

9.5.2 However, for the CNP presumption to apply, applicants are required to demonstrate:

"How their application meets the requirements in this NPS and the relevant technology specific NPS, applying the mitigation hierarchy, as well as any other legal and regulatory requirements." (NPS EN-1 paragraph 4.2.10).

9.5.3 NPS EN-1 paragraph 4.2.14 provides that:

"The Secretary of State will continue to consider the impacts and benefits of all CNP infrastructure applications on a case-by-case basis. The Secretary of State must be satisfied that the applicant's assessment demonstrates that the requirements set out above have been met. Where the Secretary of State is satisfied that they have been met, the CNP presumptions… will apply."

9.5.4 Paragraphs 4.2.15 to 4.2.22 of NPS EN-1 then go on to list specific presumptions in relation to CNP Infrastructure, including how impacts on

Green Belt, SSSIs, designated landscapes, heritage assets, HRA derogations and marine conservation zone assessments would be dealt with.

9.5.5 The following section summarises how the Scheme complies with the tests set out in NPS EN-1 and therefore why the CNP presumption applies to the DCO Application.

Compliance with the Energy NPSs

9.5.6 As demonstrated in this Planning Statement, overall, the Scheme accords with the relevant NPSs and, where required, it has been demonstrated that any harm caused by the Scheme is outweighed by the substantial benefits that are delivered. It is considered that even without applying the CNP presumption, the planning case is firmly in favour of development consent being granted.

Application of the Mitigation Hierarchy

9.5.7 The mitigation hierarchy has been applied, in satisfaction of NPS EN-1 paragraph 4.2.10.

9.5.8 **ES Volume 1, Chapter 6: EIA Methodology [EN010168/APP/6.1]** sets out the mitigation hierarchy adopted for the ES. Where significant effects have been identified, the Applicant has sought to avoid, reduce and mitigate those effects through embedded mitigation and where necessary, additional mitigation. Such mitigation measures are addressed in the various Outline Management Plans which are secured via Requirements in Schedule 2 of the **Draft DCO [REP6-005]**. However, residual significant adverse effects which cannot be avoided, reduced, or mitigated, remain as outlined in **ES Volume 1, Chapter 22: Summary of Residual Effects [APP-074]**.

Compliance with other legal and regulatory requirements

9.5.9 As summarised below, the DCO Application has been prepared in compliance with other legal and regulatory requirements, in satisfaction of NPS EN-1 paragraph 4.2.10.

Habitats Regulation Assessment

9.5.10 A Habitats Regulation Assessment has been undertaken as set out in the **Habitats Regulations Assessment Report [REP3-090]** which confirms that no significant adverse effects on the site integrity of the relevant European sites are deemed likely, either in isolation or in combination with other projects.

Water Framework Directive

9.5.11 A **Water Framework Directive (WFD) Assessment [REP1-094]** has been undertaken and concludes that the Scheme will not result in deterioration of waterbody status or to prevent the achievement of relevant environmental objectives set out in the Severn River Basin Management Plan. On that basis, the Scheme is compliant with the objectives of the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017.

Infrastructure Planning (Application: Prescribed Forms and Procedures) Regulations 2009

9.5.12 The DCO Application has been prepared in accordance with the requirements of the APFP Regulations 2009 as evidenced in the **Consultation Report [APP-022]** and the **Consultation Report Appendices [APP-023 to APP-051]** and in the content of the application itself.

The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

9.5.13 The EIA has been undertaken in accordance with the EIA Regulations, as explained in **ES Volume 1, Chapter 6: EIA Methodology [APP-058]**.

Application of the CNP Presumption

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

9.5.15 Paragraph 4.2.15 of NPS EN-1 provides that:

"Where residual non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. Therefore, in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts."

9.5.16 The exceptions to the presumption of consent are defined as:

"Residual impacts onshore and offshore which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero. Further, the same exception applies to this presumption for residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk."

9.5.17 As demonstrated in this Planning Statement, there are no residual impacts as a result of the Scheme which would outweigh the need, nor are there any residual impacts which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, irreplaceable habitats, the achievement of net zero, offshore navigation or onshore flood and coastal erosion.

9.5.18 As a result, decision making will be in accordance with NPS EN-1 paragraph 4.2.16 which states:

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

9.5.19 As demonstrated in this Planning Statement, the tests that require a clear outweighing of harm have been met.

9.5.20 Paragraph 4.2.17 of NPS EN-1 states that:

"The Secretary of State will take as a starting point that CNP Infrastructure will meet the following, non-exhaustive, list of tests:

- *Where development within a Green Belt requires very special circumstances to justify development;*
- *Where development within or outside a Site of Special Scientific Interest (SSSI) requires the benefits (including need) of the development in the location proposed to clearly outweigh both the likely impact on features of the site that make it a SSSI, and any broader impacts on the national network of SSSIs;*
- *Where development in nationally designated landscapes requires exceptional circumstances to be demonstrated; and*
- *Where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional."*

9.5.21 The Scheme is not located within Green Belt and no substantial harm to or loss of significance to heritage assets is anticipated.

9.5.22 There are no SSSIs located on the land within the Order Limits. Two relevant SSSIs are located within 5 km of the Solar PV Sites, being Harries Ground, Rodbourne SSSI, which is located immediately adjacent to Lime Down E and Sutton Lane Meadows SSSI, which is located 3.67 km south of Lime Down E. A further SSSI (Stanton St Quinton Motorway Cutting SSSI) is designated solely for its geological features and has been scoped out of assessment. **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010]** includes an assessment of the likely significant

effects on Harries Ground, Rodbourne SSSI and Sutton Lane Meadows SSSI and concludes that, with appropriate mitigation, no significant adverse effects are anticipated.

9.5.23 Only a small section of the Scheme is located within the CNL, comprising 2.16 ha of the Highways Improvement Areas. This represents 0.17% of the total Scheme. The vast majority of the Scheme is located outside the CNL, albeit sections of the Solar PV Sites are considered to be within its setting. It has been demonstrated that the Scheme does not impact the special qualities of the CNL and through the enhancement measures proposed the Scheme has sought to further its purposes. Some short-term adverse effects are anticipated during Construction and Operation Year 1 on some receptors which have a visual relationship with the CNL (including views to and from the CNL). However, once mitigation planting matures, the magnitude of change would reduce, with no significant effects anticipated by Operation Year 15 and no effects identified during decommissioning. As such, there would be no significant long-term visual effects on the CNL. There are also anticipated beneficial effects within the setting of the CNL in the long term in relation to landscape fabric. The Applicant has demonstrated how the exceptional circumstances test has been met, in Section 8 of this Planning Statement (paragraph 8.3.211). On application of the CNP presumption, there is an overarching presumption that the benefits of the Scheme will meet the exceptional circumstances test for impacts on national landscapes and therefore, despite the anticipated short-term adverse effects, it is considered that the balance still weighs in favour of granting consent for the Scheme.

9.6 Summary

9.6.1 In summary, it has been demonstrated that for decision making in accordance with Section 104 of the PA 2008, the Scheme seeks to avoid and mitigate impacts on the environment and sensitive receptors where possible, with the benefits outweighing any impact. There are no sensitive designations to prevent the Scheme help deliver the CNP infrastructure to contribute to the UK's urgent requirement for the delivery of new renewable energy generation capacity and infrastructure.

10 Conclusion

10.1.1 This Planning Statement has been prepared to support the application for a DCO for the construction, operation and maintenance and decommissioning of the Lime Down Solar Park.

10.1.2 The Scheme will make a significant and timely contribution to the UK's renewable energy mix. By providing low carbon renewable electricity over its 60 year lifetime, it will help to ensure resilience, security of supply, and the provision of affordable electricity to the country, whilst contributing to meeting the UK government's legally binding target of achieving net zero by 2050 and Clean Power by 2030. As set out in NPS EN-1, nationally significant solar projects, such as the Scheme, have been identified as of critical national priority and NPS EN-1 paragraph 3.3.63 confirms that the:

"Government strongly supports the delivery of CNP Infrastructure, and it should be progressed as quickly as possible."

10.1.3 The mitigation hierarchy has been appropriately applied to avoid, reduce and mitigate wherever practicable any likely significant adverse effects of the Scheme. As summarised in **ES Volume 1, Chapter 22: Summary of Residual Effects [APP-074],** significant adverse effects remain in relation to: landscape effects on the 1 km local study area during construction and year 1 operation; visual effects on a number of private, public and transport receptors for the lifetime of the development; effects on hedgerows during the construction phase; effects on breeding birds – ground nesting birds of open habitats during construction; effects on some category A and B trees within the Cable Route Corridor during the construction phase; socio-economic effects on an equestrian facility and bridleway WT|MALW|54 (during construction only) and long distance recreational routes (during construction, peak replacement activities and decommissioning); and effects on soils and agriculture during construction. However, the residual adverse effects would be localised, are largely short-term (with the majority of adverse effects limited to the construction phase), and temporary and/or reversible at the end of the Scheme's lifetime. Further, the substantial benefits of the Scheme clearly outweigh the residual harms that would arise, including the Scheme's contribution to meeting Government targets on Clean Power by 2030 and Net Zero by 2050, together with more localised beneficial effects that are anticipated during operation and maintenance such as beneficial effects to ecology and biodiversity and heritage assets, and longer terms beneficial effects on soil health at decommissioning. Finally, the CNP presumption requires that the residual impacts are outweighed by the urgent need.

10.1.4 As a result, the Scheme is in accordance with national energy policy, national planning policy, and the relevant development plan documents

when considered as a whole. None of the exceptions in section 104(4) to 104(8) of the PA 2008 apply.

10.1.5 The overall planning balance is therefore overwhelmingly in favour of the grant of development consent for the Scheme.

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Glossary

Term	Acronym	Definition
Battery Energy Storage System	BESS	Technology that stores energy for later use, helping to balance supply and demand in the electricity grid.
Biodiversity Net Gain	BNG	An approach to development, land and marine management that leaves biodiversity in a measurably better state than before the development took place
Carbon Budget	CB	A cap on the amount of greenhouse gases emitted over a specific period.
Carbon Capture Utilisation and Storage	CCUS	Technologies that capture carbon dioxide emissions and either reuse or store it to prevent it from entering the atmosphere.
Clean Power 2030	CP2030	The UK government's action plan to achieve a clean power system by 2030.
Construction Environmental Management Plan	CEMP	A document outlining how environmental impacts will be controlled during the construction phase.
Cotswolds National Landscape	CNL	A designated landscape area in the Cotswolds designated for its distinctive character and natural beauty. Previously known as an Area of Natural Beauty (AONB).
Critical National Priority	CNP	Infrastructure projects deemed essential for achieving national energy objectives, security, and economic benefits within NPS EN-1.
Department of Energy Security and Net Zero	DESNZ	The UK government department responsible for energy security and achieving net zero emissions.
Design Approach Document	DAD	A document that sets out the overarching design vision, principles, and rationale for a development, explaining how good design has been considered and embedded throughout the project lifecycle.
Development Consent Order	DCO	A legal order granting permission for the development of a Nationally Significant Infrastructure Project.
Energy White Paper	EWP	A UK government document outlining the strategy for the energy system to achieve net zero.
Environmental Impact Assessment	EIA	The process that evaluates the environmental effects of the Scheme.
Environmental Statement	ES	A document presenting the findings of the Environmental Impact Assessment for a project.
Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009	APFP Regulations	The regulations setting out what must be included in a Development Consent Order application.

Term	Acronym	Definition
Landscape and Ecological Management Plan	LEMP	A plan setting out how landscaping and ecological enhancements will be delivered and maintained over time.
Ministry of Housing, Communities and Local Government, previously: Department for Levelling Up, Housing and Communities; and Department for Communities and Local Government	MHCLG (2018-2021, 2024-) DLUHC (2021-2024) DCLG (2006-2018)	Government department responsible for national planning policy, housing delivery and the support of local government structure
National Planning Policy Framework	NPPF	A framework that sets out the government's planning policies for England and how they should be applied.
National Policy Statement	NPS	Documents that set out national policy for major infrastructure projects.
Nationally Significant Infrastructure Project	NSIP	Projects that meet certain thresholds defined in the Planning Act 2008, requiring development consent from the Secretary of State.
Net Zero Strategy	NZS	The UK government's plan to achieve net zero greenhouse gas emissions by 2050.
Outline Decommissioning Strategy	n/a	A document explaining how the project will be safely removed and land restored at end of life.
Permissive Path	n/a	A route provided by the landowner for public access, not a legally protected Right of Way.
Planning Inspectorate	n/a	The executive agency, sponsored by the Ministry of Housing, Communities and Local Government, that deals with national infrastructure planning applications.
Design Principles	n/a	Site-specific design objectives used to guide the evolution of a project.
Public Rights of Way	PRoW	Legal routes over land which the public can use for walking, cycling, horse riding, or driving, depending on the classification.
Rochdale Envelope	n/a	A flexible approach to assess a range of possible development scenarios within the EIA.
Secretary of State	SoS	A senior official in the UK government responsible for determining a DCO application.
Statement of Common Ground	SoCG	A written statement summarising agreed and outstanding matters between the applicant and stakeholders.

Lime Down
Solar Park

Annex A : National Policy Accordance Tables

Overarching National Policy Statement for energy EN-1
National Policy Statement for renewable energy infrastructure EN-3
National Policy Statement for electricity networks infrastructure EN-5
2025 National Policy Statement EN-1
2025 National Policy Statement EN-3
National Planning Policy Framework

Overarching National Policy Statement for Energy (EN-1)

Relevant Paragraph	Detail	Scheme Compliance
Government policy on energy and energy infrastructure development		
Paragraph 2.1.3	To produce the energy required for the UK and ensure it can be transported to where it is needed, a significant amount of infrastructure is needed at both local and national scale. High quality infrastructure is crucial for economic growth, boosting productivity and competitiveness. Part 3 of this NPS provides further details on the need for, and importance of, energy to economic prosperity and social well-being.	As explained in the **Statement of Need [EN010168/APP/7.1]** the Scheme will be a substantial infrastructure asset, which, if consented, will deliver large amounts of cheap, secure and low-carbon electricity. This will help meet the need for new infrastructure at both a local and national scale, boosting productivity and competitiveness. Solar infrastructure can also be constructed relatively quickly, compared to other technologies, as explained in the **Statement of Need [EN010168/APP/7.1]** which states that the Scheme would generate power ahead of other potential technologies, which may have longer construction timeframes or have potentially not yet been proven at scale.
Paragraph 2.2.1	In June 2019, the UK became the first major economy to legislate for a 2050 net zero Greenhouse Gases ('GHG') emissions target through the Climate Change Act 2008 (2050 Target Amendment) Order 2019. In December 2020, the UK communicated its Nationally Determined Contributions to reduce GHG emissions by at least 68 per cent from 1990 levels by 2030. In April 2021, the government legislated for the sixth carbon budget (CB6), which requires the UK to reduce GHG emissions by 78 per cent by 2035 compared to 1990 levels.	The **Statement of Need [EN010168/APP/7.1]** sets out that the Scheme, if consented, will deliver large amounts of cheap, secure, and low carbon electricity which will help the UK achieve its Sixth Carbon Budget commitments and stay on track to achieve net zero by 2050. **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** assesses the GHG emissions likely produced through the construction, operation and maintenance and decommissioning phases of the

Relevant Paragraph	Detail	Scheme Compliance
		Scheme. **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** confirms that over the 60 year lifespan of the Scheme, the total energy generated would be around 23.54 TWh and 24.26 TWh for tracker and fixed panels respectively. Accordingly, whilst the Scheme's construction does result in increased GHG emissions, the conclusion of the assessment is that, overall, the Scheme is likely to result in significant and beneficial residual effects for the whole Scheme lifecycle due to the clean energy produced by the Scheme, which will provide a net reduction in GHG emissions compared to a scenario without the Scheme. Over the Scheme's lifespan, which is estimated to be 60 years for the purpose of this assessment, it is estimated the Scheme will result in a net saving of 218,611 tCO2e if tracker panels are used or 253,839 tCO2e for fixed panels in comparison with a scenario whereby the Scheme does not come into effect and emissions from the grid in the baseline year of operation were used.
Paragraph 2.3.3	Our objectives for the energy system are to ensure our supply of energy always remains secure, reliable, affordable, and consistent with meeting our target to cut GHG emissions to net zero by 2050, including through delivery of our carbon budgets and Nationally Determined Contribution. This will require a step change in the decarbonisation of our energy system.	The **Statement of Need [EN010168/APP/7.1]** explains that the Scheme produces urgently needed low carbon solar generation and, if consented, will contribute to the achievement of government objectives to deliver sustainable development that enables decarbonisation. By doing so, the Scheme will provide energy that is secure, low carbon and low-cost. Furthermore, the **Statement of Need [EN010168/APP/7.1]** sets out that the Scheme is required to ensure that the UK remains on track to meet its legally binding carbon emissions

Relevant Paragraph	Detail	Scheme Compliance
		reduction targets, including the Sixth Carbon Budget and Nationally Determined Contribution. As also explained in the **Statement of Need [EN010168/APP/7.1],** the Scheme, if consented as a leading large-scale solar scheme in the UK, represents approximately 2% of the new large-scale solar generation capacity required to achieve the bottom of the 2035 Future Energy Scenarios (identified by the National Energy System Operator) derived Capacity Range. Therefore, the Scheme is essential to move the UK towards the future of efficient decarbonisation through the deployment of large-scale, technologically and geographically diverse low carbon generation assets. As demonstrated in **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** the Scheme is likely to result in significant and beneficial residual effects for the whole Scheme lifecycle due to the clean energy produced by the Scheme, which will provide a net reduction in GHG emissions compared to a scenario without the Scheme.
Paragraph 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. This includes the infrastructure needed to convert primary sources of energy (e.g. wind) into energy carriers (e.g. electricity or hydrogen), and to store and transport primary fuels and	The **Statement of Need [EN010168/APP/7.1]** explains that the Scheme, if consented, will be a substantial infrastructure asset, which will deliver large amounts of cheap, secure, and low carbon electricity which will help the UK achieve its Sixth Carbon Budget commitments and stay on track to achieve net zero by 2050.

Relevant Paragraph	Detail	Scheme Compliance
	energy carriers into and around the country. It also includes the infrastructure needed to capture, transport and store carbon dioxide. The requirement for new energy infrastructure will present opportunities for the UK and contributes towards our ambition to support jobs in the UK's clean energy industry and local supply chains.	As acknowledged within the **Statement of Need [EN010168/APP/7.1]**, integration technologies, which provide flexibility, will play an essential role in achieving the decarbonisation of the energy system, enhancing the benefits brought by low carbon generation. The Scheme includes Battery Energy Storage Systems (BESS) which provide flexibility to the electricity network as they are able to import power when supply outstrips demand, and export power when demand outstrips supply. **ES Volume 1, Chapter 16: Socio-economic Tourism, and Recreation [EN010168/APP/6.1]** estimates that the Scheme will create 268 Full Time Equivalent (FTE) per annum with the estimated on-site construction workforce expected to peak at approximately 692 total employees (gross direct employment) during the construction phase. During operation, 15 permanent jobs would be generated. **ES Volume 1, Chapter 16: Socio-economic Tourism, and Recreation [EN010168/APP/6.1]** sets out that in a peak replacement scenario, 125 FTE are required and in the decommissioning phase up to a gross of 214 FTE employees per annum are estimated. The jobs created will be in the renewables sector, specifically relating to solar installation, but also electricity transmission and the supply chain. As such the Scheme will contribute towards the ambition of

Relevant Paragraph	Detail	Scheme Compliance
		supporting jobs in the UK's clean energy industry and local supply chains.
Paragraph 2.3.5	The sources of energy we use are changing. Since the industrial revolution, our energy system has been dominated by fossil fuels. That remains the case today. Although representing a record low, fossil fuels still accounted for just over 76 per cent of energy supply in 2020. We need to dramatically increase the volume of energy supplied from low carbon sources.	This policy notes the need to dramatically increase the volume of energy supplied from low carbon sources, requiring an increase in the amount of energy supplied from low-carbon infrastructure such as the Scheme. As explained in the **Statement of Need [EN010168/APP/7.1]**, the Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure, and low carbon electricity.
Paragraph 2.3.6	We need to transform the energy system, tackling emissions while continuing to ensure secure and reliable supply, and affordable bills for households and businesses. This includes increasing our supply of clean energy from renewables, nuclear and hydrogen manufactured using low carbon processes (low carbon hydrogen), and, where we still emit carbon, developing the industry and infrastructure to capture, transport and store it.	The **Statement of Need [EN010168/APP/7.1]** explains that the Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure, and low carbon electricity which will help the UK achieve its Sixth Carbon Budget commitments and stay on track to achieve net zero by 2050.
Paragraph 2.3.7	Decarbonisation means we are likely to become more dependent on some forms of energy compared to others. Using electrification to reduce emissions in large parts of transport, heating and industry could lead to more than half of final energy demand being met by electricity in 2050, up from 17 per cent in 2019, representing a doubling in demand for electricity.	The **Statement of Need [EN010168/APP/7.1]** recognises the contribution that the Scheme, and other low carbon schemes, will make to the UK's decarbonisation policy objectives. The **Statement of Need [EN010168/APP/7.1]** also sets out that decarbonisation is a legally binding climate change target of the UK and of global significance and that urgent action is needed to keep globalisation on track

Relevant Paragraph	Detail	Scheme Compliance
		to limit global warming. Accordingly, if consented, the Scheme would comprise an essential component of the UK's plan to deliver a future of efficient and geographically diverse low carbon generation schemes.
Paragraph 2.5.1	Given the vital role of energy to economic prosperity and social well-being, it is important that our supplies of energy remain secure, reliable and affordable.	The **Statement of Need [EN010168/APP/7.1]** addresses how the Scheme contributes to the provision of secure, reliable and affordable low carbon energy. In terms of energy security, the **Statement of Need [EN010168/APP/7.1]** explains that the Scheme, if consented, would contribute to an adequate and dependable GB generation mix, through enabling the generation of more low carbon power from indigenous and renewable resources. Therefore, the Scheme will make a significant contribution to energy security needs, and the decarbonisation needs of the UK. Regarding reliability, the **Statement of Need [EN010168/APP/7.1]** states that UK solar has generated over 10 TWh annually since 2016, rising to over 14 TWh in 2023. Therefore, UK solar makes an important and reliable annual contribution to meeting national demand for energy. In relation to affordability, the **Statement of Need [EN010168/APP/7.1]** sets out that the Scheme will be a substantial infrastructure asset, which if consented

Relevant Paragraph	Detail	Scheme Compliance
		will deliver large amounts of cheap, secure, and low carbon electricity in support of the government's energy policy aims to ensure that the national energy system always remains secure, reliable, affordable, and low carbon.
The need for new nationally significant infrastructure projects		
Paragraph 3.1.1	This Part of the NPS explains why the government sees a need for significant amounts of new large-scale energy infrastructure to meet its energy objectives and why the government considers that the need for such infrastructure is urgent.	In line with the government recognising a need for significant amounts of new large-scale energy infrastructure, the **Statement of Need [EN010168/APP/7.1]** explains that the Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure, and low carbon electricity which will help the UK achieve its Sixth Carbon Budget commitments and stay on track to achieve net zero by 2050.
Paragraph 3.1.2	However, it will not be possible to develop the necessary amounts of such infrastructure without some significant residual adverse impacts. These effects will be minimised by the application of policy set out in Parts 4 and 5 of this NPS. See also Part 2 of each technology specific NPS.	Given the Scheme comprises EIA development as defined by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, an EIA has been undertaken to assess the environmental impacts of the Scheme, with the findings presented in the **Environmental Statement (ES) [EN010168/APP/6.1/6.2/6.3/6.4]**. The mitigation hierarchy has been appropriately applied to avoid, reduce and mitigate wherever practicable any likely significant adverse effects of the Scheme. Although a small number of localised and short term residual significant adverse effects remain, given the relative large-scale nature of the Scheme

Relevant Paragraph	Detail	Scheme Compliance
		and the substantial benefits it will provide, it is considered that these residual effects are outweighed. Section 8 of the **Planning Statement [EN010168/APP/7.2]** considers the compliance of the Scheme with national and local planning policy taking into account significant effects identified in the **ES [EN010168/APP/6.1/6.2/.6.3/6.4]**, and Section 9 of the **Planning Statement [EN010168/APP/7.2]** sets out the planning balance of the Scheme, considering both its benefits and effects. The **Planning Statement [EN010168/APP/7.2]** concludes that there are no adverse impacts of sufficient weight, either on their own or collectively, that would mean the DCO should not be made. In accordance with this paragraph 3.1.2 of NPS EN-1, and the acknowledgement that some significant adverse impacts may arise, it is considered the SoS should give substantial weight to the urgent need for this type of energy infrastructure in the decision-making process.
Paragraph 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, including through delivery of our carbon budgets and National Determined Contributions.	The **Statement of Need [EN010168/APP/7.1]** explains that the Scheme, if consented, will be a substantial infrastructure asset, which will deliver large amounts of cheap, secure, and low carbon electricity which will help the UK achieve its Sixth Carbon Budget commitments and stay on track to achieve net zero by 2050.

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 3.2.3	It is not the role of the planning system to deliver specific amounts or limit any form of infrastructure covered by this NPS. It is for industry to propose new energy infrastructure projects that they assess to be viable within the strategic framework set by government. This is the nature of a market-based energy system. With the exception of new coal or large-scale oil-fired electricity generation, the government does not consider it appropriate for planning policy to set limits on different technologies but planning policy can be used to support the government's ambitions in energy policy and other policy areas.	As noted by this policy, planning policy does not set limits on different technologies proposed, with the exception of new coal or large-scale oil-fired electricity generation. Therefore, the presence of additional low carbon technologies in the area, or the growing competition in the energy sector should not affect the need for the Scheme.
Paragraph 3.2.4	It is not the government's intention in presenting any of the figures or targets in this NPS to propose limits on any new infrastructure that can be consented in accordance with the energy NPSs. A large number of consented projects can help deliver an affordable electricity system, by driving competition and reducing costs within and amongst different technology and infrastructure types. Consenting new projects also enables projects utilising more advanced technology and greater efficiency to come forward. The delivery of an affordable energy system does not always mean picking the least cost technologies. A diversity of supply can aid in ensuring affordability for the system overall and relative costs can change over time, particularly for new and emerging technologies. It is not the role of the planning system to compare the costs of individual developments or technology types.	In accordance with this policy, the Scheme contribute towards the delivery of an affordable electricity system, alongside other schemes, helping to drive competition and reduce costs amongst different technology and infrastructure types. The Scheme also provides for flexibility in design to utilise more advanced technology and provide greater efficiency should this be available at detailed design, and contributes towards a more diverse energy supply.

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 3.2.5	The government has other mechanisms to influence the delivery of its energy objectives and imposing limits on the consenting of different types of energy infrastructure would reduce competition, increase costs, and disincentivise newer, more efficient solutions coming forward. This does not reduce the need for individual projects to demonstrate compliance with planning and environmental requirements or mean that everything that obtains development consent will get built.	In accordance with this policy the Scheme has demonstrated compliance with planning policy in Section 8 of the **Planning Statement [EN010168/APP/7.2]** and environmental requirements in the **ES [EN010168/APP/6.1/6.2/6.3/6.4]**.
Paragraph 3.2.6	**The Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is a need for those types of infrastructure which is urgent, as described for each of them in this Part.** [Bold in NPS]	In accordance with this policy, the Applicant notes that the government has demonstrated there is an urgent need for infrastructure such as the Scheme. The **Statement of Need [EN010168/APP/7.1]** and **Planning Statement [EN010168/APP/7.2]** clearly set out the urgent need for the Scheme. The Applicant notes that, in accordance with this policy, the application should be considered on the basis that need has already been demonstrated.
Paragraph 3.2.7	**In addition, the Secretary of State has determined that substantial weight should be given to this need when considering applications for development consent under the Planning Act 2008.** [Bold in NPS]	This Policy emphasises that the established urgent need for the Scheme should be given substantial weight in the decision-making process. The Applicant notes that, in accordance with this policy, the urgent need for infrastructure such as the Scheme should be given substantial weight by the Secretary of State.
Paragraph 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.** [Bold in NPS]	The **Statement of Need [EN010168/APP/7.1]** sets out the need for the Scheme. It is considered to be an important and relevant matter that policy considers this need to be demonstrated.

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 3.3.3	To ensure that there is sufficient electricity to meet demand, new electricity infrastructure will have to be built to replace output from retiring plants and to ensure we can meet increased demand. Our analysis suggests that even with major improvements in overall energy efficiency, and increased flexibility in the energy system, demand for electricity is likely to increase significantly over the coming years and could more than double by 2050 as large parts of transport, heating and industry decarbonise by switching from fossil fuels to low carbon electricity. The Impact Assessment for CB6 shows an illustrative range of 465- 515TWh in 2035 and 610-800TWh in 2050.	As explained in the **Statement of Need [EN010168/APP/7.1]** and Section 5 of the **Planning Statement [EN010168/APP/7.2]** the Scheme will contribute towards meeting the demand for energy which is expected to rise in the future.
Paragraph 3.3.8	The government has considered alternatives to the need for new largescale electricity infrastructure and concluded that these would be limited to reducing total demand for electricity through efficiency measure or through greater use of low carbon hydrogen in decarbonising the economy; reducing maximum demand through demand side response; and increasing the contribution of decentralised and smaller-scale electricity infrastructure. In addition, there are alternative ways of decarbonising heating and transportation, which are being developed alongside electrification of these sectors.	The **Statement of Need [EN010168/APP/7.1]** explains why large-scale solar schemes are needed alongside other forms of generation. The **Statement of Need [EN010168/APP/7.1]** sets out that as part of a diverse generation mix, solar generation improves the stability of capacity utilisations which in turn improves generation dependability and when developed alongside other renewable technologies, large-scale solar will help smooth out seasonal variations and more closely match anticipated seasonal average levels of demand. In accordance with paragraph 3.2.6 above the Scheme should be considered on the basis that its need is established, and this established and urgent need should be given substantial weight in the decision making process.

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 3.3.10	The precise level of electricity demand during the transition to net zero is uncertain and could be affected by alternative means of decarbonising these sectors, such as the use of low carbon hydrogen, and the pace of that decarbonisation. However, it is prudent to plan on a conservative basis to ensure that there is a sufficient supply of electricity to meet demand across a wide range of future scenarios, including where the use of hydrogen is limited.	The **Statement of Need [EN010168/APP/7.1]** considers the current and future generation mix and how the Scheme is well-suited to help meet this demand, alongside other technologies. In accordance with paragraph 3.2.6 above the Scheme should be considered on the basis that its need is established, and this established and urgent need should be given substantial weight in the decision making process.
Paragraph 3.3.12	Decentralised and community energy systems such as micro-generation contribute to our targets on reducing carbon emissions and increasing energy security. These technologies could also lead to some reduction in demand on the main generation and transmission system. However, the government does not believe they will replace the need for new large-scale electricity infrastructure to meet our energy objectives. This is because connection of large-scale, centralised electricity generating facilities via a high voltage transmission system enables the pooling of both generation and demand, which in turn offers a number of economic and other benefits, such as more efficient bulk transfer of power and enabling surplus generation capacity in one area to be used to cover shortfalls elsewhere.	This policy sets out that while decentralised and community energy schemes such as rooftop solar contribute towards targets on reducing carbon emissions and increasing energy security, they do not replace the need for new large-scale electricity infrastructure such as the Scheme. As explained in the **Statement of Need [EN010168/APP/7.1]** the Scheme will connect to the National Electricity Transmission System (NETS) with sufficient capacity to transmit the energy the Scheme will generate to consumers nationally as well as into local distribution networks. The Scheme should be considered on the basis that its need is established, and this established need should be given substantial weight in the decision, as per paragraph 3.2.6 of NPS EN-1.

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 3.3.13	The Net Zero Strategy sets out the government's ambition for increasing the deployment of low carbon energy infrastructure consistent with delivering our carbon budgets and the 2050 net zero target. This made clear the commitment that the cost of the transition to net zero should be fair and affordable.	The **Statement of Need [EN010168/APP/7.1]** explains that large-scale solar power reduces the energy generated by more expensive and more carbon intensive forms of generation. Solar therefore decarbonises the electricity system and lowers the market price of electricity. The **Statement of Need [EN010168/APP/7.1]** sets out that due to technological advances, solar facilities are already among the cheapest form of electricity generation in the UK and government produced forecasts indicate that costs will continue to reduce in the future.
Paragraph 3.3.16	If demand for electricity doubles by 2050, we will need a fourfold increase in low carbon generation and significant expansion of the networks that transport power to where it is needed. In addition, we committed in the Net Zero Strategy to take action so that by 2035, all our electricity will come from low carbon sources, subject to security of supply, whilst meeting a 40-60 per cent increase in electricity demand. This means that the majority of new generating capacity needs to be low carbon.	The **Statement of Need [EN010168/APP/7.1]** explains that the Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure, and low carbon electricity which will help the UK achieve its Sixth Carbon Budget commitments and stay on track to achieve net zero by 2050.
Paragraph 3.3.19	Given the changing nature of the energy landscape, we need a diverse mix of electricity infrastructure to come forward, so that we can deliver a secure, reliable, affordable, and net zero consistent system during the transition to 2050 for a wide range of demand, decarbonisation, and technology scenarios.	The **Statement of Need [EN010168/APP/7.1]** considers the current and future generation mix and how the Scheme is well-suited to help meet this demand, alongside other technologies. As explained in the **Statement of Need [EN010168/APP/7.1]** the Scheme would be an essential component of the UK's plan to deliver a future of efficient decarbonisation

Relevant Paragraph	Detail	Scheme Compliance
		through the deployment of large-scale, technologically and geographically diverse low carbon generation.
Paragraph 3.3.20	Wind and solar are the lowest cost ways of generating electricity, helping reduce costs and providing a clean and secure source of electricity supply (as they are not reliant on fuel for generation). Our analysis shows that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar.	The **Statement of Need [EN010168/APP/7.1]** sets out conclusions on affordability of solar and explains that due to technological advances, solar facilities are already among the cheapest form of electricity generation in the UK and government produced forecasts indicate that costs will continue to reduce in the future. The Scheme contributes to an energy system that is secure, reliable, affordable and consistent with meeting net zero, therefore is in direct compliance with this policy.
Paragraph 3.3.25	Storage has a key role to play in achieving net zero and providing flexibility to the energy system, so that high volumes of low carbon power, heat and transport can be integrated.	This paragraph recognises the role that energy storage has in providing flexibility to the energy system. In accordance with this, the Scheme includes a Battery Energy Storage System (BESS) to provide flexibility and release energy to the NETS when it is required most.
Paragraph 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.	This paragraph recognises the role that energy storage has in providing flexibility to the energy system. In accordance with this, the Scheme includes a BESS to provide flexibility, releasing energy to the NETS when it is required most. Storage integrated within the Scheme will contribute towards reduced electricity costs and increased reliability.
Paragraph 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	This paragraph recognises the role that energy storage has in providing flexibility to the energy system. In accordance with this, the Scheme includes a co-located BESS to provide flexibility, releasing energy to

Relevant Paragraph	Detail	Scheme Compliance
	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 NETS when it is required most. Furthermore, as set out in the **Statement of Need [EN010168/APP/7.1]**, the BESS will also help the Scheme operate flexibly as an essential part of a zero-carbon electricity and energy system.
Paragraph 3.3.57	Government has committed to reduce GHG emissions by 78 per cent by 2035 under carbon budget 6. According to the Net Zero Strategy this means that by 2035, all our electricity will need to come from low carbon sources, subject to security of supply, whilst meeting a 40-60 per cent increase in demand.	The **Statement of Need [EN010168/APP/7.1]** explains that the Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure, and low carbon electricity which will help the UK achieve its Sixth Carbon Budget commitments and stay on track to achieve net zero by 2050.
Paragraph 3.3.58	Given the urgent need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation, there is an urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy.	As explained in the **Statement of Need [EN010168/APP/7.1]** the Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure, and low carbon electricity, for which need is established. The Scheme should be considered on the basis that its need is established, and this established need should be given substantial weight in the decision making process, as per paragraph 3.2.6 of NPS EN-1.
Paragraph 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	As explained in the **Statement of Need [EN010168/APP/7.1]** the Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure, and low carbon electricity, and contribute to the UK meeting its carbon

Relevant Paragraph	Detail	Scheme Compliance
	concentration risk and not relying on one fuel or generation type) • providing an affordable, reliable system (through the deployment of technologies with complementary characteristics) • ensuring the system is net zero consistent (by remaining in line with our carbon budgets and maintaining the options required to deliver for a wide range of demand, decarbonisation and technology scenarios, including where there are difficulties with delivering any technology)	reduction targets and support the 2050 net zero GHG emissions target. The Scheme should be considered on the basis that its need is established, and this established need should be given substantial weight in the decision making process, as per paragraph 3.2.6 of NPS EN-1.
Paragraph 3.3.60	Known generation technologies that are included within the scope of this NPS (and would be classed as an NSIP if above the relevant capacity thresholds set out under the Planning Act 2008) include:… Solar PV.	This paragraph confirms that Solar PV generation facilities, such as the Scheme, are included in the designated suite of Energy NPSs.
Paragraph 3.3.61	The need for all these types of infrastructure is established by this NPS and a combination of many or all of them is urgently required for both energy security and Net Zero, as set out above.	This confirms that the need for Solar PV is established by NPS EN-1. This established need should be given substantial weight in the decision making process, as per paragraph 3.2.6 of NPS EN-1.
Paragraph 3.3.62	Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. Section 4.2 states which energy generating technologies are low carbon and are therefore CNP infrastructure.	The **Statement of Need [EN010168/APP/7.1]** set out that the Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure, and low carbon electricity which will help the UK achieve its Sixth Carbon Budget commitments and stay on track to achieve net zero by 2050. Section 9 of the **Planning Statement [EN010168/APP/7.2]** confirms that the CNP

Relevant Paragraph	Detail	Scheme Compliance
		presumptions apply in the case of the Scheme, given that the Applicant has demonstrated that the Scheme is in accordance with the NPSs, the mitigation hierarchy has been applied and compliance with other legal and regulatory requirements has been demonstrated. Therefore, it can be concluded the CNP presumption applies to the Scheme and accordingly should be taken into account in the decision making process.
Paragraph 3.3.63	Subject to any legal requirements, the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible.	Section 9 of the **Planning Statement [EN010168/APP/7.2]** considers the legal and regulatory requirements (Habitats Regulation Assessment, Water Framework Directive, the Infrastructure Planning (Application: Prescribed Forms and Procedures) Regulations 2009 and the EIA Regulations) and concludes that along with demonstrating compliance with the energy NPSs and application of the mitigation hierarchy, the CNP presumption applies to the Scheme.
Paragraph 3.3.65	There is an urgent need for new electricity network infrastructure to be brought forward at pace to meet our energy objectives.	This paragraph confirms the urgent need for the Scheme. The Scheme will deliver large amounts of cheap, secure, and low carbon electricity and has the potential to be operational by 2029.
Paragraph 3.3.82	Government has committed to reduce GHG emissions by 78 per cent by 2035 under CB6. 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 **Statement of Need [EN010168/APP/7.1]** sets out that the Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure, and low carbon electricity which will help the UK achieve its Sixth Carbon Budget commitments and stay on track to achieve net zero by 2050.

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 3.3.83	Given the urgent need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation, there is an urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy.	This paragraph confirms the urgent need for the Scheme. The Scheme will deliver large amounts of cheap, secure, and low carbon electricity and has the potential to be operational by 2029.
Assessment Principles		
Paragraph 4.1.5	In considering any proposed development, in particular when weighing its adverse impacts against its benefits, the Secretary of State should take into account: • its potential benefits including its contribution to meeting the need for energy infrastructure, job creation, reduction of geographical disparities, environmental enhancements, and any long-term or wider benefits • its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy	The Applicant has assessed the impacts associated with the Scheme, along with the benefits it will provide. Section 5.3 of the **Planning Statement [EN010168/APP/7.1]** sets out the benefits of the Scheme, while its contribution to meeting the need for energy infrastructure is detailed in the **Statement of Need [EN010168/APP/7.1]** and Section 5.2 of the **Planning Statement [EN010168/APP/7.2]**. The benefits of the Scheme are summarised below. **Low Cost Electricity** – The Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure, and low carbon electricity which will help the UK stay on track to achieve net zero by 2050. **Ecological and Landscape Enhancements** – The Scheme proposes to deliver substantial new hedgerow and tree planting, reinforcement planting at existing hedgerows and field boundaries, extensive grassland

Relevant Paragraph	Detail	Scheme Compliance
		habitat creation and sympathetic management both within buffers and under the Solar PV arrays, as well as discrete, valuable habitat creation away from the Solar PV Panels. **Biodiversity Net Gain** – The Scheme will deliver, as a minimum, 10% BNG, which is secured via Requirement 9 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**. The **BNG Assessment Report [EN010168/APP/7.8]** indicates that BNG in excess of 10% will be achieved, with a total net gain of 63.80% for area habitat units, 19.35% for hedgerow units and 25.30% for watercourse units in relation to the Solar PV Sites. The total net gain for the whole Scheme (i.e. Solar PV Sites and Cable Route Corridor combined) is 34.75% for area habitat units, 12.31% for hedgerow units and 20.08% for watercourse units, as set out in the **BNG Assessment Report [EN010168/APP/7.8]**. **Permissive Paths** – The Scheme includes the creation of 12.8 km of new non-vehicular permissive paths on each of the Solar PV Sites for the lifetime of the Scheme to provide pedestrians and riders improved accessibility to the countryside and improved connectivity of the wider PRoW network. **Employment Generation** – The Scheme is anticipated to create 268 Full Time Equivalent (FTE) per annum with the estimated on-site construction workforce expected to peak at approximately 692 total

Relevant Paragraph	Detail	Scheme Compliance
		employees (gross direct employment) during the construction phase. During operation, 15 permanent jobs would be generated. In a peak replacement scenario, 125 FTE are required and in the decommissioning phase up to a gross of 214 FTE employees per annum are estimated. **Economic Benefits** – The net direct employment generated by the Scheme during construction is anticipated to induce an uplift of £15.7 million Gross Value Added (GVA) per annum to the area within 20km of the Scheme. The Scheme is anticipated to induce a further uplift of £10.2 million GVA per annum more generally in the economy of the Study Area through indirect and induced economic benefits associated with the Scheme's construction. During operation, the net direct employment generated by the Scheme is anticipated to create an uplift of £2.12 million GVA per annum, of which approximately £564,000 GVA per annum is anticipated to be generated within 20km of the Scheme. During the peak replacement scenario, the net direct employment from the Scheme is anticipated to generate an uplift of £7.34 million GVA in the Study Area, with an additional £2.13 million GVA elsewhere in the UK. During decommissioning, the net direct employment generated is anticipated to induce an estimated uplift of £12.6 million GVA per annum within 20km of the Scheme. **Skills Training** – The **Outline Skills, Supply Chain**

Relevant Paragraph	Detail	Scheme Compliance
		and Employment Plan [EN010168/APP/7.20], which is secured via Requirement 18 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**, sets out the proposals to promote apprenticeship and training schemes to enhance local skills and qualification rates and help retrain people in work displaced by the Scheme, and decrease the proportion of workers required to be brought in from further afield. The potential adverse impacts of the Scheme, 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 are assessed in the relevant chapters, figures and appendices of the **ES [EN010168/APP/6.1/6.2/6.3]**. They are also summarised in the **Planning Statement [EN010168/APP/7.2]** and have been taken into account in the overall planning balance, which concludes that the benefits of the Scheme outweigh the localised and short term residual effects.
Paragraph 4.1.6	In this context, the Secretary of State should take into account environmental, social and economic benefits and adverse impacts, at national, regional and local levels.	The environmental, social and economic benefits of the Scheme are set out in Section 5.3 of the **Planning Statement [EN010168/APP/7.2]**. The adverse impacts of the Scheme are set out in the relevant chapters, figures and appendices of the **ES [EN010168/APP/6.1/6.2/6.3]**.
Paragraph 4.1.7	Where this NPS or the relevant technology specific NPSs require an applicant to mitigate a particular impact as far as possible, but the Secretary of State	Section 9 of the **Planning Statement [EN010168/APP/7.2]** summarises the benefits and adverse effects of the Scheme and applies the

Relevant Paragraph	Detail	Scheme Compliance
	considers that there would still be residual adverse effects after the implementation of such mitigation measures, the Secretary of State should weigh those residual effects against the benefits of the proposed development. For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases. This presumption, however, does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero. Further, the same exception applies to this presumption for residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk.	planning balance, which concludes that the benefits of the Scheme outweigh the localised and short term residual effects. Section 9 of the **Planning Statement [EN010168/APP/7.2]** considers the CNP presumption, in accordance with this policy, and confirms that the CNP presumption will apply in relation to the Scheme. Given that the Applicant has demonstrated that the Scheme is in accordance with the NPSs, the mitigation hierarchy has been applied and compliance with other legal and regulatory requirements has also been demonstrated. Therefore, it can be concluded the CNP presumption applies to the Scheme and accordingly should be taken into account in the decision making process. It concludes that, following application of the planning balance and CNP presumption, there is an overwhelming case in favour of granting development consent for the Scheme.
Paragraph 4.1.12	Other matters that the Secretary of State may consider both important and relevant to their decision-making may include Development Plan documents or other documents in the Local Development Framework.	Other matters considered both important and relevant by the Secretary of State to their decision-making including Development Plan documents and other documents in the Local Development Framework have been considered in the **Planning Statement [EN010168/APP/7.2]** and **Annex B: Local Policy Accordance Tables** to the Planning Statement, which provides an assessment of the Scheme's compliance with the relevant Development Plan Policies.

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 4.1.13	Where the project conflicts with a proposal in a draft Development Plan, the Secretary of State should take account of the stage which the Development Plan document in England or Local Development Plan in Wales has reached in deciding what weight to give to the plan for the purposes of determining the planning significance of what is replaced, prevented, or precluded.	**Annex B: Local Policy Accordance Tables** to the **Planning Statement [EN010168/APP/7.2]** set out the Scheme's compliance with local development plans, including draft development plans. It should be noted that emerging local plans for Wiltshire Council and South Gloucestershire Council have been considered in **Annex B: Local Policy Accordance Tables** to the **Planning Statement [EN010168/APP/7.2]**.
Paragraph 4.1.14	The closer the Development Plan document in England or Local Development Plan in Wales is to being adopted by the LPA, the greater weight which can be attached to it.	The Wiltshire Core Strategy (2015) and the South Gloucestershire Local Plan (2013) are adopted and therefore afforded full weight. An assessment of the Scheme's compliance against the planning policies in the Wiltshire Core Strategy and the South Gloucestershire Local Plan is set out at **Annex B: Local Policy Accordance Tables** of the **Planning Statement [EN010168/APP/7.2]**.
Paragraph 4.1.15	In the event of a conflict between these documents and an NPS, the NPS prevails for the purpose of Secretary of State decision making given the national significance of the infrastructure.	The Applicant notes that in the event of a conflict between the Development Plan and the NPS, the NPS prevails for the purpose of the Secretary of State decision making given the national significance of the Scheme.
Paragraph 4.2.4	Government has therefore concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure.	This paragraph confirms that nationally significant low carbon infrastructure, such as the Scheme, is a CNP.

Relevant Paragraph	Detail	Scheme Compliance
		The **Planning Statement [EN010168/APP/7.2]** confirms that the CNP presumption applies in relation to the Scheme.
Paragraph 4.2.5	This does not extend the definition of what counts as nationally significant infrastructure: the scope remains as set out in the Planning Act 2008. Low carbon infrastructure for the purposes of this policy means: • for electricity generation, all onshore and offshore generation that does not involve fossil fuel combustion (that is, renewable generation, including anaerobic digestion and other plants that convert residual waste into 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	This paragraph confirms that Solar PV generation facilities, such as the Scheme, are classified as low carbon infrastructure and as such are covered by the definition of "CNP". The need for the Scheme is set out in the **Statement of Need [EN010168/APP/7.1]** and in Section 5 of the **Planning Statement [EN010168/APP/7.2]**.
Paragraph 4.2.6	The overarching need case for each type of energy infrastructure and the substantial weight which should be given to this need in assessing applications, as set out in paragraphs 3.2.6 to 3.2.8 of EN-1, is the starting point for all assessments of energy infrastructure applications.	This confirms that substantial weight should be afforded to the Scheme in the decision-making process due to its need being established as a CNP. The need for the Scheme is set out in the **Statement of Need [EN010168/APP/7.1]** and Section 5 of the **Planning Statement [EN010168/APP/7.2]**. Section 9 of the **Planning Statement [EN010168/APP/7.2]** sets out the planning balance and confirms that the CNP presumption applies in the case of the Scheme, concluding that there is an overwhelming case in favour of granting development consent for the Scheme.
Paragraph 4.2.7	The CNP policy **does not** create an additional or cumulative need case or weighting to that which is	The **Statement of Need [EN010168/APP/7.1]** and Section 5 of the **Planning Statement**

Relevant Paragraph	Detail	Scheme Compliance
	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.	**[EN010168/APP/7.2]** set out the need for the Scheme and note the established need for low-carbon infrastructure as a CNP and that such schemes should be brought forwards with urgency. In compliance with this policy, the **Planning Statement [EN010168/APP/7.2]** sets out the need case, the impacts of the Scheme, the application of the mitigation hierarchy, and applies the planning balance in consideration of any benefits and residual adverse impacts before applying the CNP presumption at Section 9. Section 9 of the **Planning Statement [EN010168/APP/7.2]** confirms that the CNP presumption applies in the case of the Scheme.
Paragraph 4.2.8	During decision making, the CNP policy will influence how non-HRA and non-MCZ residual impacts are considered in the planning balance. The policy will therefore also influence how the Secretary of State considers whether tests requiring clear outweighing of harm, exceptionality, or very special circumstances have been met by a CNP Infrastructure application. Further detail is provided in paragraphs 4.2.15 to 4.2.17, and Figure 2.	This paragraph emphasises that when consenting a CNP Scheme, consideration should be given to CNP policy when considering whether tests are met by the application. The urgent need for CNP infrastructure will outweigh any residual effects in all but the most exceptional cases. Section 9 of the **Planning Statement [EN010168/APP/7.2]** confirms that the CNP presumption applies in the case of the Scheme.
Paragraph 4.2.9	During decision making, the CNP policy also explains the Secretary of State's approach to HRA derogations and MCZ assessments. Specifically, the policy explains how the alternative solutions and IROPI tests are considered by the Secretary of State. Further detail is provided in paragraphs 4.2.18 to 4.2.22, and Figure 3.	There are no Marine Conservation Zones (MCZs) relevant to the Scheme. A **Habitats Regulation Assessment Report [EN010168/APP/7.10]** has been prepared and submitted by the Applicant which assesses the

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		implications of the Scheme on sites set out in the Habitats Regulations including SACs and SPAs. It concludes that with the adoption of mitigation measures, no adverse effects on site integrity of the Bath and Bradford-on-Avon Bats SAC, Severn Estuary SAC, Severn Estuary SPA or the Severn Estuary Ramsar site are deemed likely, either in isolation or in combination with other projects. Given the **Habitats Regulation Assessment Report [EN010168/APP/7.10]** concludes no adverse effects on site integrity there is therefore no IROPI or Alternative Solutions assessment stages in the process.
Paragraph 4.2.10	Applicants for CNP infrastructure must continue to show how their application meets the requirements in this NPS and the relevant technology specific NPS, applying the mitigation hierarchy, as well as any other legal and regulatory requirements.	The **Planning Statement [EN010168/APP/7.2]** demonstrates how the Scheme meets the requirements of the relevant technology NPSs, including NPS EN-1, EN-3 and EN-5. This has been done before application of the CNP presumption. **Annex A: National Policy Accordance Tables** of the **Planning Statement [EN010168/APP/7.2],** takes account of relevant policy in NPS eN-1, NPS EN-3 and NPS En-5.
Paragraph 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.	**ES Volume 1: Chapter 6: EIA Methodology [EN010168/APP/6.1]** confirms that the mitigation hierarchy (avoid or prevent, reduce and offset) has been applied throughout the design and development of the Scheme. Application of the mitigation hierarchy has resulted in a Scheme with limited significant and

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	Applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated.	residual effects, with those that cannot be avoided, reduced or mitigated set out in the **ES [EN010168/APP/6.1/6.2/6.3/6.4]**. The **Design Approach Document [EN010168/APP/7.3]** sets out the design principles that apply to the Scheme, including Design Principle 2 which seeks to adhere to the mitigation hierarchy to reduce and control any adverse effects on the environment throughout the lifecycle of the Scheme from construction through to operation and maintenance and decommissioning. As set out in the **Design Approach Document [EN010168/APP/7.3]** examples of application of the mitigation hierarchy include the removal of solar PV panels in parts of Lime Down A, B, C, D and E to reduce potential landscape and heritage impacts and applying offset buffers to sensitive receptors. **ES Volume 1: Chapter 22: Summary of Residual Effects** sets out that with appropriate mitigation implemented, a relatively limited number of short and long term significant adverse effects are anticipated on landscape and visual, ecology, arboriculture, socio-economics and soils and agriculture. These effects are considered to be limited relative to the scale of the Scheme and outweighed by the need for the Scheme. Residual beneficial effects are also anticipated, in relation to climate change, the landscape fabric,

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		ecology and biodiversity at a local scale, cultural heritage and soil resources.
Paragraph 4.2.12	Applicants should set out how residual impacts will be compensated for as far as possible. Applicants should also set out how any mitigation or compensation measures will be monitored and reporting agreed to ensure success and that action is taken. Changes to measures may be needed e.g. adaptive management. The cumulative impacts of multiple developments with residual impacts should also be considered.	The **Commitments Register [EN010168/APP/7.26]** sets out the Scheme's mitigation measures, including any monitoring requirements, as well as how mitigation measures are secured in the DCO application. Requirements set out in Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**, secure the following management plans which set out mitigation measures, the outlines of which are submitted with the DCO application: • **Outline Construction Environmental Management Plan** (Outline CEMP) **[EN010168/APP/7.12]**; • **Outline Operational Environmental Management Plan** (Outline OEMP) **[EN010168/APP/7.13]**; • **Outline Decommissioning Strategy [EN010168/APP/7.14]**; • **Outline Soil Resources Management Plan** (Outline SRMP) **[EN010168/APP/7.15]**; • **Outline Public Rights of Way and Permissive Paths Management Plan [EN010168/APP/7.17]**. • **Outline Landscape Ecological Management Plan** (Outline LEMP) **[EN010168/APP/7.18]**; • **Outline Ecological Protection and Mitigation Strategy** (Outline EPMS) **[EN010168/APP/7.19]**; • **Outline Skills, Supply Chain and Employment Plan** (Outline SSCEP) **[EN010168/APP/7.20]**;

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		• **Outline Battery Safety Management Plan** (Outline BSMP) **[EN010168/APP/7.21]**; and • **Outline Construction Traffic Management Plan** (Outline CTMP) **[EN010168/APP/7.22].** Other control mechanisms include the **Works Plans [EN010168/APP/2.3]** and the parameters set out in the **Design Principles and Parameters [EN010168/APP/7.4]** which are secured by Requirement 5 of the **Draft DCO [EN010168/APP/3.1]**. **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1]** sets out an assessment of the potential for cumulative and in-combination effects as a result of the Scheme. **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1]** concludes that, taking a conservative worse case approach, significant cumulative effects with the short list of developments are identified at a limited and discrete number of receptors comprising tourism and recreation impacts during the construction phase for example, on Corsham Park, PRoW WT|CORM|122, WT|HULL|29, and Sustrans Cycle Route 403, and on skylark at a District level. However as set out in the **Planning Statement [EN010168/APP/7.2]**, these significant cumulative effects have only been identified during the construction phase and do not continue into the operation of the Scheme. Accordingly, significant cumulative effects are limited to the short-term.

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		Furthermore, inter project communication will take place to minimise tourism and recreation impacts whilst the impact to skylark is likely to reduce to not significant as and when further details of mitigation are proposed in any application to discharge the relevant conditions of 18/08271/OUT (which would be required before any development could take place). Within the majority of technical chapters, no likely significant effects have been identified through the cumulative effects assessment where they were not already predicted for the Scheme in isolation.
Paragraph 4.2.14	The Secretary of State will continue to consider the impacts and benefits of all CNP Infrastructure applications on a case-by-case basis. The Secretary of State must be satisfied that the applicant's assessment demonstrates that the requirements set out above have been met. Where the Secretary of State is satisfied that they have been met, the CNP presumptions set out below apply.	The assessment undertaken within the **ES [EN010168/APP/6.1/6.2/6.3]** demonstrates that the requirements of this policy have been met and the CNP presumptions should apply in the decision-making process. Section 9 of the **Planning Statement [EN010168/APP/7.2]** confirms that the CNP presumption applies in the case of the Scheme.
Paragraph 4.2.15	Where residual non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. Therefore, in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts. The exception to this presumption of consent are residual impacts onshore and offshore which present an unacceptable risk to, or unacceptable interference with, human health and public safety,	Section 9 of the **Planning Statement [EN010168/APP/7.2]** confirms that the CNP presumption applies in the case of the Scheme. As summarised in the **Planning Statement [EN010168/APP/7.2]**, there are no residual impacts as a result of the Scheme which would outweigh the need, nor are there any residual impacts which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence,

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	defence, irreplaceable habitats or unacceptable risk to the achievement of net zero. Further, the same exception applies to this presumption for residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk.	irreplaceable habitats, the achievement of net zero, offshore navigation, flood and coastal erosion.
Paragraph 4.2.16	As a result, the Secretary of State will take as the starting point for decision-making that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances.	It is demonstrated within the **Planning Statement [EN010168/APP/7.2]** that any harm caused by the Scheme is outweighed by the substantial benefits that are delivered. It is considered that even without applying the CNP presumption, the planning case is firmly in favour of development consent being granted.
Paragraph 4.2.17	This means that the Secretary of State will take as a starting point that CNP Infrastructure will meet the following, non-exhaustive, list of tests: • where development within a Green Belt requires very special circumstances to justify development; • where development within or outside a Site of Special Scientific Interest (SSSI) requires the benefits (including need) of the development in the location proposed to clearly outweigh both the likely impact on features of the site that make it a SSSI, and any broader impacts on the national network of SSSIs. • where development in nationally designated landscapes requires exceptional circumstances to be demonstrated; and	It is acknowledged in this policy that the Secretary of State will consider than CNP infrastructure such as the Scheme will meet the list of tests outlined. Section 9 of the **Planning Statement [EN010168/APP/7.2]** assesses the Scheme against each of these tests, confirming that: • the Scheme is not located in Green Belt; • There are no SSSIs on land within the Order Limits; and • A very small section (2.16 ha) of the Scheme is located within the Cotswolds National Landscape (CNL) (Highways Improvement Areas), which is a nationally designated landscape. The remainder is outside of the CNL, but sections of the Solar PV Sites are considered to be within its setting. However, on application of the CNP presumption, there is an

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	• where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional.	overarching presumption that the benefits of the Scheme will meet the exceptional circumstances test for impacts on national landscapes and therefore, despite the anticipated adverse effects, it is considered that the balance still weighs in favour of granting consent for the Scheme. • It is not anticipated that the Scheme will lead to substantial harm to or loss of significance to any designated or non-designated heritage assets.
Paragraph 4.3.1	All proposals for projects that are subject to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) must be accompanied by an Environmental Statement (ES) describing the aspects of the environment likely to be significantly affected by the project.	The application for the Scheme is accompanied by an **ES [EN010168/APP/6.1/6.2/6.3/6.4]** that describes aspects of the environment likely to be significantly affected by the Scheme.
Paragraph 4.3.5	For the purposes of this NPS and the technology specific NPSs the ES should cover the environmental, social and economic effects arising from preconstruction, construction, operation and decommissioning of the project.	The **ES [EN010168/APP/6.1/6.2/6.3/6.4]** covers the environmental, social and economic effects arising from preconstruction, construction, operation and decommissioning of the Scheme.
Paragraph 4.3.9	As in any planning case, the relevance or otherwise to the decision making process of the existence (or alleged existence) of alternatives to the proposed development is, in the first instance, a matter of law. This NPS does not contain any general requirement to consider alternatives or to establish whether then proposed project represents the best option from a	There is no general requirement in the relevant national planning policy to consider alternatives or establish that the proposed Scheme represents the 'best option' from a policy perspective. The **Design Approach Document [EN010168/APP7.3]** sets out the design vision and the design principles that provided a clear framework for evolution of the

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	policy perspective. Although there are specific requirements in relation to compulsory acquisition and habitats sites, the NPS does not change requirements in relation to compulsory acquisition and habitats sites.	Scheme's design since inception to ensure that good design is embedded and sets out the design evolution of the Scheme. Regulation 14(1)(d) of the EIA Regulations requires that an environmental statement should include a description of the reasonable alternatives studied. Accordingly, **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]**, provides an assessment of the alternatives considered including the consideration of alternative sites, layouts, construction routes, cable routes, BESS areas, construction compounds, and solar infrastructure technologies. Further detail on the alternative sites considered for the Scheme is set out in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3]** which concludes that there are no more suitable and available locations within the 20km search area than the proposed location for the Scheme, based on the criteria identified, and that the Scheme's location is therefore assessed to be suitable for the scale of solar development proposed. The **Planning Statement [EN010168/APP/7.2]** sets out how the Scheme accords with policies and legislation where alternatives are relevant. In terms of compulsory acquisition, the Applicant would only seek to exercise compulsory acquisition powers over land which cannot be secured through voluntary

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		agreement. Further details are contained within the Statement of Reasons **[EN010168/APP/4.1]**.
Paragraph 4.3.10	The applicant must provide information proportionate to the scale of the project, ensuring the information is sufficient to meet the requirements of the EIA Regulations.	The **ES [EN010168/APP/6.1/6.2/6.3/6.4]** meets the requirements of the EIA Regulations and provides information proportionate to the scale of the Scheme.
Paragraph 4.3.11	In some instances, it may not be possible at the time of the application for development consent for all aspects of the proposal to have been settled in precise detail. Where this is the case, the applicant should explain in its application which elements of the proposal have yet to be finalised, and the reasons as to why this is the case.	The Applicant wishes to retain flexibility in the design of the Scheme at the time of submission so that the detailed design of the Scheme can be informed by technical considerations, post-consent work, and take advantage of innovation in technology. The extent of the flexibility is detailed in **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** and set out in the **Design Principles and Parameters [EN010168/APP/7.4]** and **Design Approach Document [EN101068/APP/7.3]**. Aspects of the Scheme that require design flexibility include, but are not limited to, the arrangement of the: • Solar PV Panels and panel type/specification; • Conversion Units/33 kV Sub-distribution Switch Rooms; • Associated Development such as the BESS Area and Substations; and • Grid Connection Cables and Interconnecting Cables, i.e the routing of the cables within the Cable Route Cable.

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Paragraph 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 EIA presented within the **ES [EN010168/APP/6.1/6.2/6.3/6.4]** has been undertaken adopting the principles set out in the Planning Inspectorate's Advice Note Nine: Rochdale Envelope which provides guidance regarding the degree of flexibility that may be considered appropriate within an application for development consent under the Planning Act 2008. **ES Volume 1 Chapter 6: EIA Methodology** sets out for each technical discipline, the maximum (and where relevant, minimum) parameters for the elements where flexibility needs to be retained have been assessed under the Rochdale Envelope approach. The approach also recognises that the worst-case parameter for one technical assessment may differ from another, ensuring that worst case overall impacts are predicted. Each technical chapter **(ES Volume 1, Chapter 7 to Chapter 20 [EN010168/APP/6.1]**) describes the parameters applied in relation to the relevant assessment.
Paragraph 4.3.15	Applicants are obliged to include in their ES, information about the reasonable alternatives they have studied. This should include an indication of the main reasons for the applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility.	Regulation 14(1)(d) of the EIA Regulations requires that an environmental statement should include a description of the reasonable alternatives studied. Accordingly, **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]**, provides an assessment of the alternatives considered including the consideration of alternative sites, layouts, construction routes, cable routes, BESS areas, construction compounds, and solar infrastructure technologies.

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		ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3] sets out the Applicants assessment methodology during the site selection process. The Applicant followed a six-stage approach to identify and evaluate the proposed Scheme location and other potential areas for solar development, as follows: • Stage 1: Identification of an area of search near the available grid connection point. • Stage 2: Exclusion of various planning, environmental and spatial constraints, in accordance with policy considerations (such as a preference not to site on best and most versatile agricultural land), to identify the most unconstrained land. • Stage 3: Application of considerations around site size and land assembly, use of previously developed land and topography to identify potential development areas on the remaining land. • Stage 4: Evaluation of the identified potential development areas against assessment indicators such as ecology and biodiversity, land use, landscape and visual, flood risk etc. • Stage 5: Widening the search to consider further potential development areas on parcels of Grade 3 agricultural land, and land within flood zones 2 and 3.

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		• Stage 6: Widening the search to consider further potential development areas on parcels of land with a higher gradient (5% or less). **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3]** set out that the site comprised a collection of land parcels to the north of the M4, between the villages of Corston, Hullavington, Luckington and Sherston, and is between 15-20 km from the point of connection at the Existing National Grid Melksham Substation. In addition, **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3]** set out that the site comprised Grade 3 agricultural land, with some smaller sections of Grade 4 and one small section of Grade 2 land (approximately 5%), there were no listed buildings or conservation areas and the site had small sections of Flood Zone 3. Overall, there were no major constraints identified which would render the site unviable for the Scheme and initial approaches to landowners were positively received and sufficient land was made available by landowners to accommodate the Scheme. On this basis, the site represented the preferred location for the Scheme. **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3]** concludes that there are no more suitable and available locations within the 20km search area than the proposed location for the Scheme, based on the criteria identified, and that the Scheme's location is therefore

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		assessed to be suitable for the scale of solar development proposed. Further detail on the alternative sites considered for the Scheme is set out in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3]**. .
Paragraph 4.3.17	Where there is a policy or legal requirement to consider alternatives, the applicant should describe the alternatives considered in compliance with these requirements.	**ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** sets out the policy and legal requirements to consider alternatives, including as part of an applicant's EIA. On this basis, alternatives have been considered, as set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]**.
Paragraph 4.3.22	Given the level and urgency of need for new energy infrastructure, the Secretary of State should, subject to any relevant legal requirements (e.g. under the Habitats Regulations) which indicate otherwise, be guided by the following principles when deciding what weight should be given to alternatives: • the consideration of alternatives in order to comply with policy requirements should be carried out in a proportionate manner; and • only alternatives that can meet the objectives of the proposed development need to be considered.	**ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** sets out an assessment of the alternatives considered. The **Planning Statement [EN010168/APP/7.2]** sets out a consideration of alternatives in relation to relevant policy requirements. The assessment in the ES and consideration of policy in the **Planning Statement [EN010168/APP/7.2]** has been carried out in a proportionate manner. The assessment has also only considered alternatives that can meet the objectives of the Scheme, and sets out why these considered alternatives are not feasible.
Paragraph 4.3.23	The Secretary of State should be guided in considering alternative proposals by whether there is a realistic prospect of the alternative delivering the same	The assessment of alternatives in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** has been guided by this policy.

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	infrastructure capacity (including energy security, climate change, and other environmental benefits) in the same timescale as the proposed development.	The Applicant has assessed alternative sites for the Scheme as set out in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3]** based on a methodology to identify sites within a 20km radius from the Existing National Grid Melksham Substation which might realistically offer the same infrastructure capacity and benefits as the Scheme. Once identified, the alternative sites were rated against assessment criteria to determine their suitability. The assessment concludes that there are no more suitable and available locations within the 20km search area than the proposed location for the Scheme, based on the criteria identified, and that the Scheme's location is therefore assessed to be suitable for the scale of solar development proposed. In addition to the sites identified in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3]**, the Applicant has also considered sites put forward by consultees at EIA Scoping and statutory consultation such as: • Salisbury Plain – constrained due to its classification as a Special Protection Area, a Site of Special Scientific Interest, a Special Area of Conservation and a Special Landscape Area. • Westbury Chalk Quarry – covered by the Salisbury Plain Special Protection Area mitigation zone and the Special Landscape Area for the Salisbury Plain. Also, the current

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		topography of the quarry (with steep walls that would likely affect irradiance levels) makes it an unsuitable site for solar development in its current state, with the site requiring significant remediation to become usable for solar. • Westbury Cement Works - covered by the Salisbury Plain Special Protection Area mitigation zone and is only 15 hectares (ha) and therefore falls below the Applicant's requirement for individual land parcels which are at least 40 ha in size. • Minety Substation – the Applicant has undertaken extensive engagement with National Grid throughout the scoping and development of the Scheme to determine the appropriate point of connection. The Existing National Grid Melksham Substation was identified as having available capacity for a utility scale energy project such as the Scheme. Whilst Minety substation does house 400kV infrastructure, the Applicant's discussions with National Grid confirmed there was no connection available at Minety for the Scheme. **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** also sets out alternative generation technologies, but Solar PV is considered the most suitable for the Site and none of the other technologies considered would offer the same capacity and benefits as the Scheme (in the same timescale), and/or would result in adverse effects

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		that the Scheme avoids (such as landscape effects of onshore wind generation).
Paragraph 4.3.24	The Secretary of State should not refuse an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site, and should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals.	The Applicant notes that 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. In accordance with this policy is it noted that sites considered as an alternative may be needed for future proposals. **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3]** sets out alternatives sites that have been considered. The assessment concludes that there are no more suitable and available locations within the 20km search area than the proposed location for the Scheme, based on the criteria identified, and that the Scheme's location is therefore assessed to be suitable for the scale of solar development proposed.
Paragraph 4.3.25	Alternatives not among the main alternatives studied by the applicant (as reflected in the ES) should only be considered to the extent that the Secretary of State thinks they are both important and relevant to the decision.	The Applicant notes that any alternatives not studied by the Applicant as reflected in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** should only be considered to the extent the Secretary of State thinks they are both relevant and important to the decision. The Applicant considers that the assessment of alternatives has been carried out in a proportionate manner and has

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		considered alternatives that can meet the objectives of the Scheme.
Paragraph 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.	The assessment of alternatives in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** sets out alternatives that may be capable of providing the same infrastructure capacity and the reasons these were discounted. This includes the consideration that some sites are not commercially viable due to size, or not physically suitable due to low irradiance.
Paragraph 4.3.28	Alternative proposals which are vague or immature can be excluded on the grounds that they are not important and relevant to the Secretary of State's decision.	The Applicant notes in accordance with this policy that alternative proposals which are vague or immature can be excluded. The assessment of alternatives in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** is considered proportionate to the Scheme.
Paragraph 4.3.29	It is intended that potential alternatives to a proposed development should, wherever possible, be identified before an application is made to the Secretary of State (so as to allow appropriate consultation and the development of a suitable evidence base in relation to any alternatives which are particularly relevant). Therefore, where an alternative is first put forward by a third party after an application has been made, the Secretary of State may place the onus on the person proposing the alternative to provide the evidence for its suitability as such and the Secretary of State should not necessarily expect the applicant to have assessed it.	The assessment of alternatives in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** and the accompanying **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3]** has been undertaken prior to submission of the application to the Secretary of State. The assessment has also considered alternatives sites put forward by third parties during consultation in the pre-application stage of the Scheme including the Salisbury Plain, Westbury Chalk Quarry, and Westbury

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		Cement Works. These were considered and discounted as follows: • The Salisbury Plain is a constrained site due to its classification as a Special Protection Area, a Site of Special Scientific Interest, a Special Area of Conservation, a Special Landscape Area under the Wiltshire Local Plan (and protected under saved policy C3 from the previous West Wiltshire District Plan), the presence of a number of scheduled monuments (including in the area close to Westbury) and its use for military training exercises (including a military firing range in the area close to Westbury). • Westbury Chalk Quarry is also covered by the Salisbury Plain Special Protection Area mitigation zone and the Special Landscape Area for the Salisbury Plain. Also, the current topography of the quarry (with steep walls that would likely affect irradiance levels) makes it an unsuitable site for solar development in its current state, with the site requiring significant remediation to become usable for solar. Given the current disused status of the quarry, any timescales for quarry restoration do not align with the grid connection date, therefore it is not a realistically available site for the Scheme. • The Westbury Cement Works are covered by the Salisbury Plain Special Protection Area mitigation zone. The site is flat and could offer good irradiance levels and topography.

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		However, it cannot be used in combination with the two other sites identified by consultees due to the unsuitability of those other sites. More generally, the site itself is only 15 hectares (ha) and therefore falls below the Applicant's requirement for individual land parcels which are at least 40 ha in size, as set out in **ES Volume 3, Appendix 4-1 Site Selection Assessment Report [EN010168/APP/.6.3]**.
Health		
Paragraph 4.4.4	As described in the relevant sections of this NPS and in the technology specific NPSs, where the proposed project has an effect on humans, the ES should assess these effects for each element of the project, identifying any potential adverse health impacts, and identifying measures to avoid, reduce or compensate for these impacts as appropriate.	**ES Volume 1, Chapter 18: Human Health [EN010168/APP6.1]** provides an assessment of effects on human health using IEMA guidance, throughout the construction, operation and decommissioning of the Scheme. Section 18.8 of **ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]** identifies the potential adverse health impacts that may occur as a result of the Scheme, while Section 18.9 sets out embedded mitigation measures and Section 18.11 sets out additional mitigation measures necessary to avoid, reduce or compensate for impacts on health as appropriate. Following the implementation of embedded and additional mitigation measures set out in the **Outline CEMP [EN010168/APP/7.12]**, **Outline OEMP [EN010168/APP/7.13]** and the **Outline**

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		Decommissioning Strategy [EN010168/APP/7.14], which are secured by Requirements in Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**, no residual significant effects from the Scheme on human health are anticipated at any stage.
Paragraph 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.	Section 18.13 of **ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]** sets out the cumulative impact of the Scheme on health including an assessment of the inter-project cumulative effects and in-combination cumulative effects. **ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]** concludes that there are no significant adverse cumulative effects or in-combination cumulative effects anticipated during the construction, operation and decommissioning of the Scheme in relation to human health.
Paragraph 4.4.6	Opportunities should be taken to mitigate indirect impacts, by promoting local improvements to encourage health and wellbeing, this includes potential impacts on vulnerable groups within society and impacts on those with protected characteristics under the Equality Act 2010, i.e. those groups which may be differentially impacted by a development compared to wider society as a whole.	The **Equality Impact Assessment [EN010168/APP/7.23]** considers how the Scheme may affect people with protected characteristics as defined by the Equality Act 2010. The **Equality Impact Assessment [EN010168/APP/7.23]** concludes that the Applicant has given due regard to the requirements of the Equality Act 2010 and the Public Sector Equality Duty and that with mitigation measures and inclusive practices in place, the potential for significant negative equality impacts is unlikely. The Scheme presents opportunities to generate positive outcomes, particularly in relation to employment and inclusive engagement, and is not expected to cause major

Relevant Paragraph	Detail	Scheme Compliance
		equality effects to people with protected characteristics.
Paragraph 4.4.7	Generally, those aspects of energy infrastructure which are most likely to have a significantly detrimental impact on health are subject to separate regulation (for example 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.	**ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]** provides an assessment of the likely significant effects of human health as result of the Scheme using IEMA guidance on health. The effects on human health during the construction, operation and maintenance and decommissioning phases are assessed within the ES. Relevant chapters of **ES Volume 1 [EN010168/APP/6.1]** that have considered the effects of the Scheme on human health include: • **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1];** • **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1];** • **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1];** • **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1];** • **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1];** • **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1];** • **ES Volume 1, Chapter 16: Socio-economics, Tourism and Recreation [EN010168/APP/6.1];** • **ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1];**

Relevant Paragraph	Detail	Scheme Compliance
		• **ES Volume 1, Chapter 20: Other Environmental Matters – Section 20.6: Electromagnetic Fields [EN010168/APP/6.1]; and** • **Chapter 20: Other Environmental Matters – Section 20.7: Major Accidents and Disasters [EN010168/APP/6.1].** Appropriate mitigation is outlined both within these chapters and also within the **Outline CEMP [EN010168/APP/7.12]**, **Outline OEMP [EN010168/APP/7.13]**, and the **Outline Decommissioning Strategy [EN010168/APP/7.14],** which are secured by Requirements in Schedule 2 of the **Draft DCO [EN010168/APP/3.1],** and includes (but is not limited to) the following: • Phasing and staggering works during the construction phase to reduce impacts on environmental receptors. • Embedded offsets and planting buffers in the Scheme design from roads, PRoW, recreation facilities, and neighbouring buildings and land uses to minimise the visual impact of the Scheme on the desirability of these receptors for leisure and play, and local perceptions of community identity. • Construction workers will be given additional support by the Applicant or Scheme operator to find and register with GPs across the Wider Baseline Study Area in reasonable proximity to their temporary or full-time accommodation and

Relevant Paragraph	Detail	Scheme Compliance
		where such GP surgeries have reasonable capacity to take on additional patients. Following the implementation of embedded and additional mitigation measures, no residual significant effects from the Scheme on human health are anticipated at any stage.
Paragraph 4.4.8	However, not all potential sources of health impacts will be mitigated in this way and the Secretary of State may want to take account of health concerns when setting requirements relating to a range of impacts such as noise.	**ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]** concludes that following the implementation of embedded mitigation such as phasing and staggering works during the construction phase to reduce impacts on environmental receptors and additional mitigation measures such as construction workers will be given additional support by the Applicant or Scheme operator to find and register with GPs, along with those outlined in the **Outline CEMP [EN010168/APP/7.12]**, **Outline OEMP [EN010168/APP/7.13]**, and the **Outline Decommissioning Strategy [EN010168/APP/7.14]**, which are secured by Requirements in Schedule 2 of the **Draft DCO [EN010168/APP/3.1],** no residual significant effects from the Scheme are anticipated on human health at any stage of the Scheme.
Biodiversity Net Gain		
Paragraph 4.6.1	Environmental net gain is an approach to development that aims to leave the natural environment in a measurably better state than beforehand. Projects should therefore not only avoid, mitigate and compensate harms, following the mitigation hierarchy,	**ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168APP/6.1]** confirms that with the adoption of additional mitigation measures as set out in Section 9.12 of the chapter, it is considered that the majority of significant adverse effects identified in the assessment in Section 9.10, can be reduced to neutral, non-

Relevant Paragraph	Detail	Scheme Compliance
	but also consider whether there are opportunities for enhancements.	significant levels. Significant residual effects only remain for hedgerows and breeding birds; however, this is only for construction and decommissioning and at a site and local level with beneficial significant effects determined for the operation and maintenance phase. This has been achieved through a considered and iterative design informed by a design team with qualified professional ecologists and includes avoidance, buffers and mitigation measures that will be secured through management plan requirements. In addition to protecting existing ecological sites and features, the Applicant has also taken opportunities to provide mitigation and enhancement measures within the Order Limits to increase biodiversity and provide overall net gains in habitat. The **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]** sets out how a minimum of 10% net gain will be achieved for the Scheme (using the Defra Statutory Biodiversity Metric). This sets out the net gains in biodiversity that the Scheme will deliver. The Scheme has taken advantage of opportunities to conserve and enhance biodiversity and incorporate improvements in biodiversity and therefore accords with this policy. The Scheme will deliver, as a minimum, 10% BNG, which is secured via Requirement 9 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**. The **BNG Assessment Report [EN010168/APP/7.8]** indicates that BNG in excess of 10% will be achieved, with a

Relevant Paragraph	Detail	Scheme Compliance
		total net gain of 63.80% for area habitat units, 19.35% for hedgerow units and 25.30% for watercourse units in relation to the Solar PV Sites. The total net gain for the whole Scheme (i.e. Solar PV Sites and Cable Route Corridor combined) is 34.75% for area habitat units, 12.31% for hedgerow units and 20.08% for watercourse units, as set out in the **BNG Assessment Report [EN010168/APP/7.8]**.
Paragraph 4.6.2	Biodiversity net gain is an essential component of environmental net gain. Projects in England should consider and seek to incorporate improvements in natural capital, ecosystem services and the benefits they deliver when planning how to deliver biodiversity net gain.	A Biodiversity Net Gain (BNG) Assessment has been provided within the DCO application (**Biodiversity Net Gain Assessment Report [EN010168/APP/7.8**]). This sets out the net gains in biodiversity that the Scheme will provide. Furthermore, the **Outline LEMP [EN010168/APP/7.18]** sets out the landscaping and ecological mitigation and enhancement measures for the Scheme. The overarching aim of the **Outline LEMP [EN010168/APP/7.18]** is to set out prescriptions for habitat creation and management in order to provide ecological enhancements, strengthen the green infrastructure within the local area, and to provide landscape and visual mitigation through screening of the Scheme, where necessary. Measures include planting of hedgerows and trees, woodland copses and shelterbelts, native shrub planting as well as the creation of ground nesting bird mitigation habitat and habitat boxes and wildlife enhancement features such as log piles and hibernacula. Accordingly, these

Relevant Paragraph	Detail	Scheme Compliance
		measures will contribute to improvements in natural capital and ecosystem services.
Paragraph 4.6.6	Energy NSIP proposals, whether onshore or offshore, should seek opportunities to contribute to and enhance the natural environment by providing net gains for biodiversity, and the wider environment where possible.	The Applicant is committed to achieving the Government's target of at least 10% biodiversity net gain as set out in the Environment Act 2021. The **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]** sets out how a minimum of 10% net gain will be achieved for the Scheme (using the Defra Statutory Biodiversity Metric). This sets out the net gains in biodiversity that the Scheme will provide. The Scheme will deliver, as a minimum, 10% BNG, which is secured via Requirement 9 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**. The **BNG Assessment Report [EN010168/APP/7.8]** indicates that BNG in excess of 10% will be achieved, with a total net gain of 63.80% for area habitat units, 19.35% for hedgerow units and 25.30% for watercourse units in relation to the Solar PV Sites. The total net gain for the whole Scheme (i.e. Solar PV Sites and Cable Route Corridor combined) is 34.75% for area habitat units, 12.31% for hedgerow units and 20.08% for watercourse units, as set out in the **BNG Assessment Report [EN010168/APP/7.8]**.
Paragraph 4.6.7	In England applicants for onshore elements of any development are encouraged to use the latest version of the biodiversity metric to calculate their biodiversity	The **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]** sets out how a minimum of 10% net gain will be achieved for the Scheme using the

Relevant Paragraph	Detail	Scheme Compliance
	baseline and present planned biodiversity net gain outcomes. This calculation data should be presented in full as part of their application.	Statutory Biodiversity Metric which has been used to complete the calculation which accompanies this document (**ES Volume 7: Biodiversity Net Gain Assessment Appendix – Statutory Biodiversity Metric Calculation [EN010168/APP/7.9]** refers), with mapping carried out on QGIS Version 3.34 or later.
Paragraph 4.6.8	Where possible, this data should be shared, alongside a completed biodiversity metric calculation, with the Local Authority and Natural England for discussion at the pre-application stage as it can help to highlight biodiversity and wider environmental issues which may later cause delays if not addressed.	Details of the engagement carried out by the Applicant in relation to the Scheme are set out in the **Consultation Report [EN010168/APP/5.1]**. Pre-application consultation activities are also detailed in section 1.4 of the Planning Statement, which highlights early engagement with local authorities and statutory consultees during quarter 4 of 2023. The BNG Assessment for the Scheme has not been shared with the LPA nor NE principally as surveys to underpin the assessment were ongoing until close to submission of the DCO Application and the results could change quite considerably as more survey data is collected. An earlier version of the BNG Assessment was not shared either, due to the uncertainty until the final design was established.
Paragraph 4.6.10	Biodiversity net gain should be applied after compliance with the mitigation hierarchy and does not change or replace existing environmental obligations, although compliance with those obligations will be relevant to the question of the baseline for assessing net gain and if they deliver an additional enhancement beyond meeting the existing obligation, that enhancement will count towards net gain.	As confirmed in paragraph 1.2.2 of the **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]**, the BNG assessment presented within this report follows the guidance set out within *Biodiversity Net Gain Report & Audit Templates (Version 1). CIEEM. July 2021*. It is also in line with the *British Standard 8683:2021 (Process for Designing and Implementing Biodiversity Net Gain).* The stages of Scheme design

Relevant Paragraph	Detail	Scheme Compliance
		and application of the mitigation hierarchy have followed *Biodiversity Net Gain: Good Practice Principles for Development (CIEEM, CIRA, IEMA 2016)*, where the first principle is the application of the mitigation hierarchy (Table 5 of the **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8])**. The Scheme will meet a minimum 10% BNG, consistent with the terms of the **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]** and aligned with the proposals in the **Outline LEMP [EN010168/APP/7.18]** to be secured through Requirement 7 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**.
Paragraph 4.6.13	In addition to delivering biodiversity net gain, developments may also deliver wider environmental gains and benefits to communities relevant to the local area, and to national policy priorities, such as: • reductions in GHG emissions • reduced flood risk • improvements to air or water quality, • climate adaptation, • landscape enhancement • increased access to natural greenspace, or • the enhancement, expansion or provision of trees and woodlands The scope of potential gains will be dependent on the type, scale, and location of specific projects. Applicants should look for a holistic approach to delivering wider	The Scheme will deliver significant reductions in greenhouse gas emissions over its lifetime, as detailed in **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]**. As the Scheme contributes to the delivery of low carbon, it will lead to reductions in greenhouse gas emissions and the need for fossils fuels which may result in an indirect improvement in air quality. The Scheme's climate adaption measures are set out in **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]**, **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**, and **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage Environment [EN010168/APP/6.1]**.

Relevant Paragraph	Detail	Scheme Compliance
	environmental gains and benefits through the use of nature-based solutions and Green Infrastructure.	The Scheme has taken other opportunities to provide enhancements, including by providing and connecting green infrastructure (as set out by the **Outline LEMP [EN010168/APP/7.18]** to be secured through Requirement 7 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**).
Paragraph 4.6.15	Applications for development consent should be accompanied by a statement demonstrating how opportunities for delivering wider environmental net gains have been considered, and where appropriate, incorporated into proposals as part of good design (including any relevant operational aspects) of the project.	The **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]** provides an assessment of how effective measures have been incorporated into the Scheme to deliver environmental net gains. The Scheme will meet a minimum 10% BNG, consistent with the terms of the **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8**] and aligned with the proposals in the **Outline LEMP [EN010168/APP/7.18]** to be secured through Requirement 7 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1],** which demonstrates that the Scheme has achieves biodiversity net gain on site. Opportunities to enhance other environmental gains are outlined by topic in the relevant sections of the **ES [EN010168/APP/6.1/6.2/6.3]** and the **Outline LEMP [EN010168/APP/7.18]** to be secured through Requirement 7 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**. How these measures contribute to the delivery of good design is set out in the **Design and Approach Document [EN010168/APP/7.3**] and

Relevant Paragraph	Detail	Scheme Compliance
		Section 6 of the **Planning Statement [EN010168/APP/7.2]**.
Paragraph 4.6.16	Applicants should make use of available guidance and tools for measuring natural capital assets and ecosystem services, such as the Natural Capital Committee's 'How to Do it: natural capital workbook', the government's guidance on Enabling a Natural Capital Approach (ENCA), and other tools that aim to enable wider benefits for people and nature.	The **Outline LEMP [EN010168/APP/7.18]** to be secured through Requirement 7 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]** sets out the landscape and ecological management strategy for the Scheme. The following documents have been consulted in the preparation of the **Outline LEMP [EN010168/APP/7.18]**, with key policies and objectives considered: • Wiltshire Core Strategy (adopted January 2025); • Wiltshire's Natural Environment Plan 2022-2030: A Green & Blue Infrastructure Strategy for Wiltshire; • Local Nature Recovery Strategy for Wiltshire and Swindon Public Consultation Draft March 2025; • Natural England Habitat Network Mapping; • Wiltshire Landscape Biodiversity Areas; • Buglife's 'B-Lines' Initiative; and • Bristol Avon Catchment Plan.
Paragraph 4.6.17	Where environmental net gain considerations have featured as part of the strategic options appraisal process to select a project, applicants should reference that information to supplement the site-specific details.	**ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** details how alternative options for the Scheme were considered during design development.

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 4.6.1 (Secretary of State decision making)	Although achieving biodiversity net gain is not currently an obligation on applicants, Schedule 15 of the Environment Act 2021 contains provisions which, when commenced, mean the Secretary of State may not grant an application for a Development Consent Order unless satisfied that a biodiversity gain objective is met in relation to the onshore development in England to which the application relates.	The Scheme will provide a minimum 10% BNG, as secured by the **Draft DCO [EN010168/APP/3.1]** and set out in the **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8**] which aligns with the proposals in the **Outline LEMP [EN010168/APP.7.18]** to be secured through Requirement 7 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**. The **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8**] demonstrates that the Scheme achieves biodiversity net gain on site.
Paragraph 4.6.2 (Secretary of State decision making)	The biodiversity gain objective will be set out in a biodiversity gain statement (as defined under the Environment Act 2021). Normally these statements would be included within an NPS, but the Act allows for the statement to be published separately where a review of an NPS has begun before the provisions are commenced, as is the case with these energy NPSs. Under the provision of the Environment Act 2021, any such separate biodiversity gain statement will be regarded as being contained within these NPSs.	The Scheme will deliver, as a minimum, 10% BNG, which is secured via Requirement 9 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**. The **BNG Assessment Report [EN010168/APP/7.8]** indicates that BNG in excess of 10% will be achieved, with a total net gain of 63.80% for area habitat units, 19.35% for hedgerow units and 25.30% for watercourse units in relation to the Solar PV Sites. The total net gain for the whole Scheme (i.e. Solar PV Sites and Cable Route Corridor combined) is 34.75% for area habitat units, 12.31% for hedgerow units and 20.08% for watercourse units, as set out in the **BNG Assessment Report [EN010168/APP/7.8]**. The **BNG Assessment Report [EN010168/APP/7.8]** aligns with the proposals in the **Outline LEMP [EN010168/APP.7.18]** to be secured through Requirement 7 in Schedule 2 to the **Draft DCO**

Relevant Paragraph	Detail	Scheme Compliance
		[EN010168/APP/3.1]. The **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8**] demonstrates that the Scheme has the potential to achieve significant biodiversity net gain on site.
Paragraph 4.6.3 (Secretary of State decision making)	The Secretary of State should give appropriate weight to environmental and biodiversity net gain, although any weight given to gains provided to meet a legal requirement (for example under the Environment Act 2021) is likely to be limited.	The delivery of a minimum of 10% of biodiversity net gain is afforded moderate positive weight in the planning balance, as set out within the **Planning Statement [EN010168/APP/7.2]**.
Design		
Paragraph 4.7.1	The visual appearance of a building, structure, or piece of infrastructure, and how it relates to the landscape it sits within, is sometimes considered to be the most important factor in good design. But high quality and inclusive design goes far beyond aesthetic considerations. The functionality of an object – be it a building or other type of infrastructure – including fitness for purpose and sustainability, is equally important.	As detailed in the **Design Approach Document [EN010168/APP/7.3]** and Section 2 of the Planning Statement, the Scheme has undergone an iterative design process which has resulted in the delivery of a functional and efficient Scheme design which will deliver large amounts of renewable and low carbon energy while being sensitive to local context and surroundings. The **Design Approach Document [EN010168/APP/7.3]** sets out the design principles that the Scheme has adopted to frame design-related decision making. These demonstrate how the Scheme has considered the landscape within which is sits, through the design being 'Landscape Led', but also the functionality of the Scheme, with a degree of flexibility in the design to enable it to adapt over time, be functional and fit for purpose.

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 4.7.2	Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is 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.	While it is acknowledged through this policy 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, the Scheme has been designed to be sensitive to place in accordance with this policy. The **Design Approach Document [EN010168/APP/7.3]** sets out the Applicant's design vision for the Scheme, as well as its evolution since inception to DCO Application submission. It has been prepared in accordance with the Planning Inspectorate's NSIP Advice Page on Good Design (2025) and clearly sets out the design decisions taken at each step of the Scheme's development, and the rationale for these decisions, as well as the mechanisms by which good design will be secured post consent. Section 5.2 of the **Design Approach Document [EN010168/APP/7.3]** sets out how the Scheme comprises sustainable infrastructure that is sensitive to place. Measures include integration of the Scheme with the landscape, the provision of 12.8 km of new permissive paths, which will be open up to 365 days per calendar year throughout the proposed 60-year operational lifetime of the Scheme as well as measures to ensure the Scheme is resilient to flooding. Furthermore, through sensitive design impacts have been reduced on heritage assets through the removal

Relevant Paragraph	Detail	Scheme Compliance
		of panels in a number of locations, the inclusion of offsets, screening and the creation of tree belts. Section 5.2 of the **Design Approach Document [EN010168/APP/7.3]** also sets out how the Scheme has been efficient in the use of natural resources through measures that lead to improvements to soil health, the majority of the Scheme being non-BMV land and the exclusion of the Bath Green Belt from the site selection process. Furthermore, greenhouse gas emissions have been minimised in the construction and operation phases where possible through the reduction of waste through re-use of materials and a reduction in vehicle emissions. Given the design of the Scheme is landscape led, Section 5.2 of the **Design Approach Document [EN010168/APP/7.3]** sets out how the Scheme delivers an appearance that demonstrates good aesthetic as far as possible through integration into the surrounding landscape, and enhancement of existing natural ecological and landscape features, as well as the provision of 12.8 km of new permissive paths. Further measures to screen the Scheme set out in the **Outline LEMP [EN010168/APP/7.18]** to be secured through Requirement 7 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**.
Paragraph 4.7.3	Good design is also a means by which many policy objectives in the NPSs can be met, for example the impact sections show how good design, in terms of	As detailed in the **Design Approach Document [EN010168/APP/7.3]** and Section 2 of the Planning Statement, the Scheme has undergone an iterative

Relevant Paragraph	Detail	Scheme Compliance
	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.	design process which has resulted in the delivery of a functional and efficient Scheme design which will deliver large amounts of renewable and low carbon energy while being sensitive to local context and surroundings, and minimising impacts on the environment as far as practicable. The **Design Approach Document [EN010168/APP/7.3]** explains how the design of the Scheme has helped to mitigate adverse effects as the Scheme has evolved up to the point of DCO submission. The Scheme includes embedded mitigation measures such as a number of Avoidance Areas in the cable corridor where non-intrusive installation methods will be used to avoid impact to sensitive features such as watercourses, hedgerows and mature vegetation. Measures such as these will help mitigate adverse impacts. Embedded mitigation measures are set out in topic specific ES Chapters in **ES Volume 1 [EN010168/APP/6.1]**, the **Outline CEMP [EN010168/APP/7.12]**, **Outline OEMP [EN010168/APP/7.13]**, and the **Outline Decommissioning Strategy [EN010168/APP/7.14]** which are secured through Requirements in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**.
Paragraph 4.7.4	Given the benefits of good design in mitigating the adverse impacts of a project, applicants should consider how good design can be applied to a project during the early stages of the project lifecycle.	The **Design Approach Document [EN010168/APP/7.3]** sets out how good design has been embedded into the Scheme from the outset of the Scheme, and how it will continue to be achieved through to detailed design, to ensure that the Scheme

Relevant Paragraph	Detail	Scheme Compliance
		achieves well-designed project outcomes. This has included appointing a Design Champion and adopting a design vision and design principles that drive design-related decision making throughout the Scheme's lifecycle, providing a framework for development of the design over the course of the pre-application stage, and informing the local community of the design development ahead of the statutory consultation.
Paragraph 4.7.5	To ensure good design is embedded within the project development, a project board level design champion could be appointed, and a representative design panel used to maximise the value provided by the infrastructure. Design principles should be established from the outset of the project to guide the development from conception to operation. Applicants should consider how their design principles can be applied post-consent.	As detailed in the **Design Approach Document [EN010168/APP/7.3]** a Design Champion has been appointed to ensure good design is embedded into the Scheme to advocate a good practice design approach and share lessons learned. In addition to the Applicants' board level Design Champion, the Applicant also appointed a project level Design Champion to lead the design process and ensure a multi-disciplinary approach. The appointed Design Champion for the Scheme was the landscape architect, who has prior experience in leading the design of other DCO solar projects. The project level Design Champion was responsible for leading the development of the indicative masterplans presented at the Preliminary Environmental Information Report (PEIR) stage and subsequent iterations following feedback received during statutory consultation, resulting in the Indicative Masterplans submitted with this DCO. These plans outline the site layout and proposed mitigation for the Scheme, which has been

Relevant Paragraph	Detail	Scheme Compliance
		developed in close coordination with the Applicant's design team. As also detailed in the **Design Approach Document [EN010168/APP/7.3]** design principles were also established from the outset of the Scheme to guide the development from conception to operation. The design principles adopted by the Scheme are as follows: 1. The design of the Scheme will be 'Landscape Led' and give due weight to the intrinsic character and beauty of the surrounding countryside; 2. Adherence to the mitigation hierarchy to reduce impacts and control any adverse effects on the environment throughout the lifecycle of the Scheme from construction through to operation and maintenance and decommissioning; 3. The Scheme will deliver a minimum 10% net gain for biodiversity through strategic habitat creation and enhancement measures; 4. The Scheme design will retain a degree of flexibility to enable it to adapt over time, be functional and fit for purpose, and respond to innovative and new technologies as well as building resilience to climate change; 5. The Scheme will be carefully designed to minimise where practicable impacts on amenity from air quality, traffic and noise effects and safeguard the health and safety of local

Relevant Paragraph	Detail	Scheme Compliance
		residents by securing suitable control measures during construction, operation and maintenance and decommissioning of the Scheme; 6. The Scheme will protect the water environment by adhering to good pollution control practice and be resilient from flooding both now and in the future and not increase the risk of flooding elsewhere; 7. The design of the Scheme will be sensitive to above and below ground heritage assets and their setting, by locating infrastructure at a suitable distance and through appropriate landscape screening; 8. The Scheme will be sensitive to existing land uses where practicable and maximise opportunities to strengthen green and blue infrastructure; and 9. The Scheme will seek to minimise the effects of the development on PRoW by incorporating measures to maintain, and where practicable, explore opportunities to improve the local footpath network. The design principles have informed the parameters, as set out in **Design Principles and Parameters [EN010168/APP/7.4]**. The parameters contained within the **Design Principles and Parameters [EN010168/APP/7.4]** are secured under Requirement 5 (detailed design approval) in the **Draft DCO**

Relevant Paragraph	Detail	Scheme Compliance
		[EN010168/APP/3.1] and apply to the detailed design of the Scheme, post consent.
Paragraph 4.7.6	Whilst the applicant may not have any or very limited choice in the physical appearance of some energy infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting relative to existing landscape character, land form and vegetation. Furthermore, the design and sensitive use of materials in any associated development such as electricity substations will assist in ensuring that such development contributes to the quality of the area. Applicants should also, so far as is possible, seek to embed opportunities for nature inclusive design within the design process.	As detailed in the **Design Approach Document [EN010168/APP/7.3]** and Section 2 of the Planning Statement, the Scheme has undergone an iterative design process which has resulted in the delivery of a functional and efficient Scheme design which will deliver large amounts of renewable and low carbon energy while being sensitive to local context and surroundings, and minimising impacts on the environment as far as practicable. As recognised within the design policies set out in the NPSs, the context of any design decisions must reflect the need to efficiently deliver large scale renewable energy infrastructure and therefore the extent to which a Scheme is able to enhance the quality of the local area may be limited. The Scheme has undergone a site selection process as detailed in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3]**, and has adopted relevant design principles that enhance the environment within which it is located. As set out in the **Design Approach Document [EN010168/APP/7.3]** the Scheme is 'Landscape Led' and gives due weight to the intrinsic character and beauty of the surrounding area. The design also adheres to the mitigation hierarchy to reduce impacts

Relevant Paragraph	Detail	Scheme Compliance
		and control any adverse effects on the environment throughout the lifecycle of the Scheme. It will also deliver a minimum 10% net gain for biodiversity through strategic habitat creation and enhancement measures. The landscape and ecological mitigation proposed for the Scheme is further detailed in the **Outline LEMP [EN010168/APP/7.18]** and the **Outline Ecological Protection and Mitigation Strategy [EN010168/APP/7.19]** to be secured through Requirements 7 and 8 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**.
Paragraph 4.7.7	Applicants must demonstrate in their application documents how the design process was conducted and how the proposed design evolved. Where a number of different designs were considered, applicants should set out the reasons why the favoured choice has been selected.	**ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** and the **Design Approach Document [EN010168/APP/7.3]** detail how the design process was conducted and how the proposed design evolved, including the reasons for why the Scheme exists in its current proposed form.
Paragraph 4.7.8	Applicants should consider taking independent professional advice on the design aspects of a proposal. In particular, the Design Council can be asked to provide design review for nationally significant infrastructure projects and applicants are encouraged to use this service. Applicants should also consider any design guidance developed by the local planning authority.	The Applicant has not sought independent design review given the design of the Scheme has evolved through input from a team of experienced solar NSIPs professionals including highways engineers, planners, landscape architects, ecologists, heritage specialists and other relevant environmental professionals. The Applicant has engaged with a wide variety of stakeholders when considering the design of the Scheme and has had regard to relevant responses received in accordance with the PA 2008 and Ministry of Housing, Communities and Local Government guidance. The Applicant has continually engaged with

Relevant Paragraph	Detail	Scheme Compliance
		key stakeholders throughout the pre-application process including (but not limited to) heritage, landscape, highway, ecology and planning officers on behalf of Wiltshire Council; South Gloucestershire Council in relation to the Highway Improvements Areas, Historic England; Natural England; and the Environment Agency. As set out in the **Design Approach Document [EN010168/APP/7.3]** design guidance prepared by Wiltshire Council and South Gloucestershire has been taken into account in the development of the design principles for the Scheme.
Paragraph 4.7.10	In the light of the above and given the importance which the Planning Act 2008 places on good design and sustainability, the Secretary of State needs to be satisfied that energy infrastructure developments are sustainable and, having regard to regulatory and other constraints, are as attractive, durable, and adaptable (including taking account of natural hazards such as flooding) as they can be.	As demonstrated in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3]** environmental and planning factors have been taken into account from the outset to avoid and reduce impacts. The Scheme has undergone an iterative design process which has resulted in the delivery of a functional and efficient Scheme design which will deliver large amounts of renewable and low carbon energy while being sensitive to local context and surroundings, and minimising impacts on the environment as far as practicable. The **Design Approach Document [EN010168/APP/7.3]** demonstrates how the application of the design vision and design principles has provided a framework for development of the design of the Scheme which has resulted in the Scheme being as attractive, durable and adaptable as it can be.

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Paragraph 4.7.11	In doing so, the Secretary of State should be satisfied that the applicant has considered both functionality (including fitness for purpose and sustainability) and aesthetics (including its contribution to the quality of the area in which it would be located, any potential amenity benefits, and visual impacts on the landscape or seascape) as far as possible.	Although the appearance of solar PV infrastructure is largely determined by its function, the design of the Scheme has evolved and been informed by design principles that have resulted in good design. As detailed in the **Design Approach Document [EN010168/APP/7.3]** the applicant has considered the functionality, aesthetics, amenity and visual impacts of the Scheme during the iterative design process. Furthermore, as demonstrated in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3]** environmental and planning factors have been taken into account from the outset to avoid and reduce impacts. **Appendix 4-1: Site Selection Assessment Report** **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.**1 confirms there would be significant beneficial effects at Year 15 and decommissioning relating to the landscape fabric. Table 1-21 of **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** includes a summary of the effects of the Scheme on the special qualities of the CNL confirming that there are no significant effects as a result of the Scheme. Paragraphs 8.10.130 to 8.10.131 **of ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** set out how the Scheme would 'seek to further' the purpose of the CNL. This includes multiple design principles incorporated into the Scheme including avoidance measures on the edge of the CNL, offsets to landscape features, extensive new tree, hedgerow and

Relevant Paragraph	Detail	Scheme Compliance
		meadow planting and measures to improve the character of landscape and maintain views on the edge of the CNL. Table 1-22 of **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** sets out the quantum of measures proposed to 'seek to further' the purpose of the CNL, which includes the retention and enhancement of existing vegetation, proposed grassland and grassland margins, proposed ground nesting bird mitigation, proposed woodland and tree planting, proposed riparian corridors and hedgerow reinforcement. These embedded mitigation and enhancement measures are incorporated into the Scheme as shown within **ES Volume 2, Chapter 3: Scheme Description** and **Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2]**, which forms part of the **Outline Landscape and Ecological Management Plan [EN010168/APP/7.18]**. Requirement 7 of the **Draft DCO [EN010168/APP/3.1]** requires the submission and approval of a landscape and ecological management plan to be substantially in accordance with the **Outline Landscape and Ecological Management Plan [EN010168/APP/7.18]** and for the landscape and ecological management plan to be implemented as approved. These measures and controls will ensure that the detailed design of the Scheme incorporates the landscape mitigation and enhancements included within the **Outline Landscape and Ecological Management Plan [EN010168/APP/7.18]**.

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Paragraph 4.7.12	In considering applications, the Secretary of State should take into account the ultimate purpose of the infrastructure and bear in mind the operational, safety and security requirements which the design has to satisfy. Many of the wider impacts of a development, such as landscape and environmental impacts, will be important factors in the design process.	As explained in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3]**, operational factors were a consideration at an early stage, alongside the consideration of planning and environmental constraints. The **Design Approach Document [EN010168/APP/7.3]** demonstrates how the design principles have provided a framework to minimise landscape and environmental impacts through good design. In terms of safety, as the Scheme includes BESS, an **Outline BSMP [EN010168/APP/7.21]** outlines the key fire safety provisions for the Scheme including measures to reduce BESS failure risks and mitigate credible failure incident scenarios. In addition, the **Outline BSMP [EN010168/APP/7.21]** provides a summary of the safety related information requirements which will be provided in advance of construction of the BESS. The purpose of **Outline BSMP [EN010168/APP/7.21]** is to identify how the Applicant will use good industry practice to reduce risk to life, property, and the environment from the BESS. The **Outline BSMP [EN010168/APP/7.21]** will be secured through Requirement 6 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**. **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** provides further details on fencing and security measures such as CCTV systems which will be used around the operational perimeter of

Relevant Paragraph	Detail	Scheme Compliance
		the operational elements of the Scheme. Requirement 10 (fencing and other means of enclosed) of the **Draft DCO [EN010168/APP/3.1]** sets out the provisions relating to fencing.
Climate Change Adaptation and Resilience		
Paragraph 4.10.5	In certain circumstances, measures implemented to ensure a scheme can adapt to climate change may give rise to additional impacts, for example as a result of protecting against flood risk, there may be consequential impacts on coastal change. In preparing measures to support climate change adaptation applicants should take reasonable steps to maximise the use of nature-based solutions alongside other conventional techniques.	In preparing measures to support climate change adaptation, consideration has been given to incorporating nature-based solutions into the Scheme. Proposals for Sustainable Drainage Systems (SuDS) have been included as part of the Scheme design, as set out in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**.
Paragraph 4.10.6	Integrated approaches, such as looking across the water cycle, considering coordinated management of water storage, supply, demand, wastewater, and flood risk can provide further benefits to address multiple infrastructure needs, as well as carbon sequestration benefits.	**ES Volume 1, Chater 7: Climate Change [EN010168/APP/6.1]** and **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** considers the supply, demand, wastewater and flood risk associated with the Scheme. In terms of supply and demand of water, **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** sets out that embedded mitigation includes coordination with the appointed contractor and utilities provider to ensure continuity of supply and avoid disruption to other users. Where needed, tankered supply may be used as a contingency. These controls are addressed further in the **Outline Water Resources Strategy**

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		[EN010168/APP/7.25] and secured through the **Outline CEMP [EN010168/APP/7.12]** to be secured through Requirement 13 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].** In terms of wastewater, as there are no public foul water sewers within the vicinity of the Scheme, welfare facilities used during construction will rely on self-contained units managed and maintained by a licensed contractor. These units are sealed, require no connection to on-site drainage infrastructure, and will be emptied and removed from site as required. This approach prevents any discharge of wastewater to land, surface water, or groundwater. The risk of pollution is therefore eliminated at source. These arrangements are secured through the **Outline CEMP [EN010168/APP/7.12],** which includes provisions for welfare facility management and waste handling. Flood risk has been minimised in a number of ways including through embedded mitigation measures, as set out in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**. Embedded mitigation measures include the following: • The use of permeable surfacing for operational access routes and compound areas. • Panel layouts are designed to retain vegetation beneath and between rows, which intercepts and attenuates runoff.

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		• Areas of formal hardstanding, such as the BESS Area and substations, incorporate SuDS-based drainage measures, including permeable sub-bases and lined infiltration trenches or soakaways where appropriate. The Solar PV Sites are expected to drain in a manner consistent with pre-development conditions. The **Outline Water Resource Strategy [EN010168/APP/7.25]** provides an early-stage evaluation of quantities of water required for the Scheme during construction and operation, and the likely resource for these demands. The **Outline Water Resource Strategy [EN010168/APP/7.25]** concludes that there is a possibility of mains water connection and water tankering for the Scheme, and therefore options for borehole water, surface water abstraction and surface water harvesting are not considered a priority for the Scheme.
Paragraph 4.10.7	In addition to avoiding further GHG emissions when compared with more traditional adaptation approaches, nature-based solutions can also result in biodiversity benefits and net gain, as well as increasing absorption of carbon dioxide from the atmosphere.	The Scheme incorporates nature-based solutions into its design. The rationale for all nature-based mitigation is set out in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168APP/6.1]**, with enhancements further detailed in the **Outline LEMP [EN010168/APP/7.18]** to be secured through Requirement 7 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**. Measures include substantial new hedgerow and tree planting, reinforcement planting at existing hedgerows and field boundaries, extensive grassland habitat creation and sympathetic management both within buffers and within the arrays,

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		as well as discrete, valuable habitat creation (e.g. ponds and meadows) in appropriate locations.
Paragraph 4.10.8	New energy infrastructure will typically need to remain operational over many decades, in the face of a changing climate. Consequently, applicants must consider the direct (e.g. site flooding, limited water availability, storms, heatwave and wildfire threats to infrastructure and operations) and indirect (e.g. access roads or other critical dependencies impacted by flooding, storms, heatwaves or wildfires) impacts of climate change when planning the location, design, build, operation and, where appropriate, decommissioning of new energy infrastructure.	**ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** has considered the direct and indirect impacts of climate change in terms of water shortages, storms, heatwaves and wildfires. Table 7-34 and 7-35 of **ES Volume 1, Chapter 7: Climate Change** set out that following the implementation of embedded mitigation measures, such as sequentially locating electrical infrastructure to areas of low flood risk; protecting workers and resources from extreme weather conditions through appropriate PPE and working practices; including Heating, Ventilation and Cooling (HVAC) systems in BESS Area; and those set out in the **Outline CEMP [EN010168/APP/7.12]** to be secured through Requirement 13 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**, no significant effects will occur from these direct impacts during the construction, operation and decommissioning of the Scheme. Impacts on the Scheme from flooding have been considered in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**. Following the implementation of embedded mitigation measures in the design of the Scheme, such as sequentially locating sensitive infrastructure to areas of low flood risk and sensitive and electrical equipment mounted on the Solar PV Panels will be elevated by the supporting legs or frame so that it is no less than

Relevant Paragraph	Detail	Scheme Compliance
		0.6 metres above the surrounding peak flood level, the effects from flooding are considered not significant. Further mitigation measures regarding flood risk and drainage are set out in the **Outline CEMP [EN010168/APP/7.12],** the **Outline LEMP [EN010168/APP/7.18],** the **Outline OEMP [EN010168/APP/7.13],** the **Outline Decommissioning Strategy [EN010168/APP/7.14],** the **Outline Soil Resources Management Plan [EN010168/APP/7.15]** and the **Outline BSMP [EN010168/APP/7.21]** to be secured through Requirements in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].**
Paragraph 4.10.9	The ES should set out how the proposal will take account of the projected impacts of climate change, using government guidance and industry standard benchmarks such as the Climate Change Allowances for Flood Risk Assessments, Climate Impacts Tool, and British Standards for climate change adaptation, in accordance with the EIA Regulations	Section 7.3 of **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** sets out the legislation, planning policy and guidance relevant to the climate change assessment. **ES Volume 1, Chapter 7: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** confirms that the latest Environment Agency guidance (Flood Risk Assessments: Climate Change Allowances, Environment Agency, February 2023) has been used in the assessment. As set out in **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** climate change resilience measures embedded into the Scheme design include: • Associated electrical infrastructure, including substations and Conversion Units sequentially

Relevant Paragraph	Detail	Scheme Compliance
		located to areas with a 'Low' probability of flooding, where practicable; • Less-flood sensitive infrastructure forming the wider Scheme (Solar PV Panels and cabling) will be sequentially located outside the 1 in 100 plus climate change annual probability extent (1% +CC) or where this is not practicable restricted to areas which would experience less than 1m depth of flooding during the same event; • For both fixed and tracker panels, all sensitive and electrical equipment on the Solar PV Panel will be elevated by the legs (including the solar panel face itself) so that it is no less than 0.6 metres above the above the 0.1% Annual Exceedance Probability (AEP) flood level; • Tracker panel units will be mounted on raised frames (raised a minimum of 0.4 metres when on maximum rotation angle) and will therefore be raised above surrounding ground levels and fitted with a tracking system. During times of flooding, solar panels may be stowed by the tracking system algorithm onto a horizontal plane, to the minimum post height of 2.5 metres above ground level. This ensures that all sensitive and electrical equipment on the solar panel is raised to a minimum of 2.5 metres above ground level in the horizontal position;

Relevant Paragraph	Detail	Scheme Compliance
		• Protecting workers and resources from extreme weather conditions through appropriate PPE and working practices as set out in the **Outline CEMP [EN010168/APP/7.12]** and secured through the detailed CEMP under Requirement 13 in the D**raft DCO [EN010168/APP/3.1]**; and • Monitoring weather forecasts and the news for Environment Agency flood warnings, relevant weather warnings, and water levels of the local waterways as set out in the **Outline CEMP [EN010168/APP/7.12]** and secured through the detailed CEMP under Requirement 13 in the D**raft DCO [EN010168/APP/3.1].** • During operation: ○ Using equipment's cooling systems where necessary, i.e. for the BESS Area and for the standalone conversion units, and adapting working practices and equipment used based on current weather conditions; and, ○ BESS Area to include Heating, Ventilation and Cooling (HVAC) systems which would be contained within the individual equipment containers. These measures are considered an adequate response to the projected climate change impacts to which the Scheme would be exposed.

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Paragraph 4.10.11	Applicants should demonstrate that proposals have a high level of climate resilience built-in from the outset and should also demonstrate how proposals can be adapted over their predicted lifetimes to a credible maximum climate change scenario. These results should be considered alongside relevant research which is based on the climate change projections.	**ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** has taken account of the projected impacts of climate change and sets out mitigation measures embedded into the design of the Scheme during construction, operation and decommissioning. This includes (but is not limited to): • Locating associated electrical infrastructure, including substations and conversion units sequentially to areas with a 'low' probability of flooding where practicable; • Less-flood sensitive infrastructure forming the wider Scheme (Solar PV Panels and cabling) will be sequentially located outside the 1 in 100 plus climate change annual probability extent (1% +CC) or where this is not practicable restricted to areas which would experience less than 1m depth of flooding during the same event; • For both fixed and tracker panels, all sensitive and electrical equipment on the Solar PV Panel will be elevated (including the solar panel face itself) so that it is no less than 0.6 metres above the surrounding peak flood level; • Tracker panel units will be mounted on raised frames (raised a minimum of 0.4 metres when on maximum rotation angle) and will therefore be raised above surrounding ground levels and fitted with a tracking system. During times of flooding, solar panels may be stowed by the tracking system algorithm onto a horizontal plane, to the minimum post height of 2.5 metres

Relevant Paragraph	Detail	Scheme Compliance
		above ground level. This ensures that all sensitive and electrical equipment on the solar panel is raised to a minimum of 2.5 metres above ground level in the horizontal position; and • BESS will include heating, ventilation and cooling systems to control the temperature and allow efficient operation during warmer conditions. As described in paragraph 7.9.9 of **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** the Scheme itself mitigates against the effects of climate change. There is a need to generate electricity and generating this through solar power results in less GHG emissions than other conventional methods. Similar measures will be developed prior to the decommissioning phase for the use of lower-carbon and more climate change resilient methods as set out in the **Outline Decommissioning Statement [EN010168/APP/7.14]** to be secured through Requirement 20 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**.
Paragraph 4.10.13	The Secretary of State should be satisfied that applicants for new energy infrastructure have taken into account the potential impacts of climate change using the latest UK Climate Projections and associated research and expert guidance (such as the EA's Climate Change Allowances for Flood Risk	The Climate Change Risk Assessment undertaken in **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** provides a description of how the Scheme will be affected by climate change impacts, taking into consideration the embedded mitigation measures that have been designed into the Scheme

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	Assessments or the Welsh Government's Climate change allowances and flood consequence assessments) available at the time the ES was prepared to ensure they have identified appropriate mitigation or adaptation measures. This should cover the estimated lifetime of the new infrastructure, including any decommissioning period.	so that it will be more resilient to the impacts identified during the review of the UK Climate Projections 2018. Mitigation measures, including the use of lower carbon and more change resilient methods in the construction, operation and maintenance and decommissioning of the Scheme, are set out in the **Outline CEMP [EN010168/APP/7.12],** the **Outline OEMP [EN010168/APP/7.13]** and **Outline Decommissioning Statement [EN010168/APP/7.14]** to be secured through Requirements in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].** The Scheme's design and integrated mitigation measures effectively address climate change risks. As set out in **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]**, no significant climate change risks during the construction, operation and maintenance or decommissioning phase have been identified.
Network Connection		
Paragraph 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.	The **Statement of Need [EN010168/APP/7.1]** and Section 5 of the **Planning Statement [EN010168/APP/7.2]** confirm that the Scheme is considered CNP infrastructure.
Paragraph 4.11.12	The Secretary of State should be satisfied that appropriate network connection arrangements are/will be in place for a given project regardless of whether one or multiple (linked) applications are submitted.	As set out in the **Grid Connection Statement [EN010168/APP/7.5]** the Applicant has accepted a valid grid connection offer from NESO to connect the Scheme to the NETS at the Melksham Substation.

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		By the time construction starts the Applicant will have obtained all the necessary land rights for the Grid Connection, whether via the preferred method of voluntary agreement or by use of compulsory acquisition and temporary use powers in the DCO.
Pollution Control and Other Environmental Regulatory Regimes		
Paragraph 4.12.9	In considering an application for development consent the Secretary of State should focus on whether the development itself is an acceptable use of the land or sea, and the impact of that use, rather than the control of processes, emissions or discharges themselves.	The application for development consent for the Scheme demonstrates it is an acceptable use of land. **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3]** sets out the Applicants assessment methodology during the site selection process to determine a suitable site for the Scheme. The Applicant followed a six-stage approach to identify and evaluate the proposed Scheme location and other potential areas for solar development and took into account a range of technical, environmental, planning and spatial constraints. The aspects of the environment likely to be significantly affected by the Scheme and the design development of the Scheme, including embedded mitigation measures, and any additional mitigation or monitoring measures are set out in the **ES [EN010168/APP/6.1/6.2/6.3]**. The outcomes of the assessment within the ES informed the design

Relevant Paragraph	Detail	Scheme Compliance
		evolution of the Scheme as detailed in the **Design Approach Document [EN010168/APP/7.3]**. The **Statement of Need [EN010168/APP/7.1]** explains that the Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure, and low carbon electricity which will help the UK achieve its Sixth Carbon Budget commitments and stay on track to achieve net zero by 2050.
Safety		
Paragraph 4.13.5	Applicants should consult with the HSE on matters relating to safety.	The Applicant has consulted with the HSE on matters relating to safety.
Paragraph 4.13.6	Applicants seeking to develop infrastructure subject to the COMAH regulations should make early contact with the Competent Authority.	The Scheme is not subject to the COMAH regulations.
Paragraph 4.13.7	If a safety report is required it is important to discuss with the Competent Authority the type of information that should be provided at the design and development stage, and what form this should take. This will enable the Competent Authority to review as much information as possible before construction begins, in order to assess whether the inherent features of the design are sufficient to prevent, control and mitigate major accidents.	The Scheme is not subject to the COMAH regulations and therefore a safety report is not required.
Paragraph 4.13.8	The Secretary of State should be satisfied that a safety assessment has been prepared, where required, and	The Scheme is not subject to the COMAH regulations and therefore a safety report is not required.

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	that the Competent Authority has raised no safety objections.	
Hazardous Substances		
Paragraph 4.14.5	Applicants must consult the HSA and HSE at pre-application stage if the project is likely to need hazardous substances consent. Hazardous substances consents are a part of the planning regime which contributes to public safety.	The Applicant has consulted with the HSE. The Scheme is not subject to the COMAH regulations.
Common Law Nuisance and Statutory Nuisance		
Paragraph 4.15.5	At the application stage of an energy NSIP, possible sources of nuisance under section 79(1) of the EPA 1990 and how they may be mitigated or limited should be identified by the applicant so that appropriate requirements can be included in any subsequent order granting development consent (see Section 5.7 on dust, odour, artificial light etc. and Section 5.12 on noise and vibration).	A **Statutory Nuisance Statement [EN010168/APP/7.6]** has been provided that assesses any possible sources of nuisance under section 79(1) of the EPA 1990. It concludes that with the mitigation measures in place, including but not limited to; development of a Dust Management Plan during decommissioning; minimising the use of lighting required for safe site operations; and Best Practicable Means to minimise noise and vibration, no significant effects are expected to occur in relation to noise and vibration matters in EIA terms, including in relation to the health of human receptors, as set out in **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** during the construction, operation (and maintenance) and decommissioning phases of the Scheme.

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		No claim against statutory nuisance in respect of noise and vibration is therefore envisaged in respect of a statutory nuisance under Section 79(1)(g) or (ga) of the EPA. The defence to proceedings in respect of statutory nuisance is set out in Part 2, Article 7 of the **Draft DCO [EN010168/APP/3.1]**.
Air Quality and Emissions		
Paragraph 5.2.7	Proximity to emission sources can have significant impacts on sensitive receptor sites for air quality, such as education or healthcare sites, residential use or sensitive or protected ecosystems. Projects near a sensitive receptor site for air quality should only be proposed in exceptional circumstances if no viable alternative site is available. In these instances, substantial mitigation of any expected emissions will be required (see paragraph 5.2.12 below).	**ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]** identifies that there are air quality sensitive receptors within the general vicinity of the Scheme, but none are in its immediate vicinity. As set out in **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]** embedded mitigation measures have been incorporated into the Scheme design to avoid and reduce impacts on air quality, which are set out in the **Outline CEMP [EN010168/APP/7.12]** (including measures to control dust and vehicle emissions during construction); the **Outline CTMP [EN010168/APP/7.22]** (including measures to control construction traffic and worker vehicle numbers); the **Outline BSMP [EN010168/APP7.21]** (including measures to deal with emissions in the event of fire); the **Outline OEMP [EN010168/APP/7.13]** and the **Outline Decommissioning Strategy [EN010168/APP/7.14]** (which both include the same air quality mitigation proposed in the Outline CEMP). These will be secured through Requirements in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**

Relevant Paragraph	Detail	Scheme Compliance
		The assessment in **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]** concludes that, with embedded mitigation, no likely significant effects are identified in relation to air quality as a result of the Scheme. No additional mitigation or monitoring is proposed.
Paragraph 5.2.8	Where the project is likely to have adverse effects on air quality the applicant should undertake an assessment of the impacts of the proposed project as part of the ES.	**ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]** assesses the likely significant effects of the Scheme on air quality and concludes that, with embedded mitigation, no likely significant effects are identified in relation to air quality as a result of the Scheme. Following the implementation of mitigation measures detailed within the **Outline CEMP [EN010168/APP/7.12]**, the **Outline CTMP [EN010168/APP/7.22]**, the **Outline BSMP [EN010168/APP/7.21]**, the **Outline OEMP [EN010168/APP/7.13]**, and the **Outline Decommissioning Strategy [EN010168/APP/7.14]**, there are no significant effects anticipated from the construction, operation and decommissioning of the Scheme on air quality. These measures will be secured through Requirements in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**
Paragraph 5.2.9	The ES should describe: • existing air quality concentrations and the relative change in air quality from existing levels;	Section 15.17 of **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]** sets out the existing background air quality pollutant concentrations, with the average NO_2 assessed at 4.5 µg/m^3, PM_{10}

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	• 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; • the predicted absolute emissions, concentration change and absolute concentrations as a result of the proposed project, after mitigation methods have been applied.	assessed at 12.0 µg/m^3 and PM_{25} assessed as 6.3 µg/m^3. Background pollutant concentrations are well below the respective air quality objectives for each pollutant. **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]** has also considered any significant air quality effects, mitigation, and any residual effects, distinguishing between the Scheme phases, and taken account of any significant emissions from any road traffic generated by the Scheme. During construction the assessment has considered effects from construction dust, construction vehicle emissions, and NRMM emissions. The assessment of effects during operation considers vehicle emissions, dust, NRMM emissions, back-up generator emissions, and BESS fire emissions. The decommissioning effects considered include Vehicle emissions and NRMM emissions. Following the implementation of mitigation measures outlined in Section 15.9 of **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]**, no residual effects on air quality are anticipated as a result of the Scheme. Emissions have been considered during the construction, operation and maintenance, and decommissioning of the Scheme in **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]**. The assessment has considered vehicle emissions, dust, NRMM emissions, back-up generator emissions, and

Relevant Paragraph	Detail	Scheme Compliance
		BESS fire emissions. No significant effects are anticipated as a result of emissions. Mitigation measures are detailed within the **Outline CEMP [EN010168/APP/7.12]**, the **Outline CTMP [EN010168/APP/7.22]**, the **Outline BSMP [EN010168/APP/7.21]**, the **Outline OEMP [EN010168/APP/7.13]**, and the **Outline Decommissioning Strategy [EN010168/APP/7.14]** and include measures such as vehicle emissions control and operational standards for construction plant and vehicles which include; all plant and vehicles will be required to switch off their engines when not in use and when it is safe to do so and avoid the use of diesel- or petrol-powered generators and use mains electricity or battery powered equipment where practicable. These measures will be secured through Requirements in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**
Paragraph 5.2.12	Where a proposed development is likely to lead to a breach of any relevant statutory air quality limits, objectives or targets, or affect the ability of a noncompliant area to achieve compliance within the timescales set out in the most recent relevant air quality plan/strategy at the time of the decision, the applicant should work with the relevant authorities to secure appropriate mitigation measures to ensure that those statutory limits, objectives or targets are not breached.	The Scheme would not lead to a breach of any relevant statutory air quality limits, objectives or targets, or affect the ability of a noncompliant area to achieve compliance.
Paragraph 5.2.13	The Secretary of State should consider whether mitigation measures are needed both for operational	The Applicant has had regard to The Environmental Targets (Fine Particulate Matter) England Regulations

Relevant Paragraph	Detail	Scheme Compliance
	and construction emissions over and above any which may form part of the project application. A construction management plan may help codify mitigation at this stage. In doing so the Secretary of State should have regard to the Air Quality Strategy in England, or the Clean Air Plan for Wales in Wales, or any successors to these and should consider relevant advice within Local Air Quality Management guidance and PM2.5 targets guidance.	2023 which set out targets for $PM_{2,5}$, and the DEFRA $PM_{2.5}$ Targets: Interim Planning Guidance (2024). **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]** provides a review of background pollutant concentrations for the Scheme has been carried out using 2021 based Defra predicted annual average background maps and finds the predicted background concentrations are well below the relevant annual average AQS objectives/critical level for each pollutant. **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]** concludes that there are no anticipated significant effects on air quality during the construction and operation of the Scheme. Mitigation measures following IAQM guidance are detailed within the **Outline CEMP [EN010168/APP/7.12]** (including measures to control dust and vehicle emissions during construction); the **Outline CTMP [EN010168/APP/7.22]** (including measures to control construction traffic and worker vehicle numbers); the **Outline BSMP [EN010168/APP7.21]** (including measures to deal with emissions in the event of fire); and the **Outline OEMP [EN010168/APP/7.13]** and **Outline Decommissioning Strategy [EN010168/APP/7.14]** (which both include the same air quality mitigation proposed in the Outline CEMP). These measures will be secured through Requirements in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 5.2.15	Many activities involving air emissions are subject to pollution control. The considerations set out in Section 4.12 on the interface between planning and pollution control therefore apply. The Secretary of State must also consider duties under other legislation including duties under the Environment Act 2021 in relation to environmental targets and have regard to policies set out in the Government's Environmental Improvement Plan 2023.	The Scheme does not comprise an activity that results in air emissions once it is operational. Notwithstanding, **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]** concludes that there are no anticipated significant effects on air quality during the construction and operation of the Scheme.
Paragraph 5.2.16	The Secretary of State should give air quality considerations substantial weight where a project would lead to a deterioration in air quality. This could for example include where an area breaches any national air quality limits or statutory air quality objectives. However, air quality considerations will also be important where substantial changes in air quality levels are expected, even if this does not lead to any breaches of statutory limits, objectives or targets.	**ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]** concludes that no significant effects are anticipated on air quality as a result of the Scheme, and therefore the Scheme will not lead to a deterioration in air quality. As set out above, mitigation measures following IAQM guidance are detailed within the **Outline CEMP [EN010168/APP/7.12]**, the **Outline CTMP [EN010168/APP/7.22]**, the **Outline BSMP [EN010168/APP/7.21]**, the **Outline OEMP [EN010168/APP/7.13]**, and the **Outline Decommissioning Strategy [EN010168/APP/7.14]**. These measures will be secured through Requirements in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].**
Paragraph 5.2.17	The Secretary of State should give air quality considerations substantial weight where a project is proposed near a sensitive receptor site, such as an	**ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]** identifies that there are air quality sensitive receptors within the general vicinity of the Scheme, but none are in its immediate vicinity. As set out in **ES Volume 1, Chapter 15: Air Quality**

Relevant Paragraph	Detail	Scheme Compliance
	education or healthcare facility, residential use or a sensitive or protected habitat.	**[EN010168/APP/6.1]**, embedded mitigation measures have been incorporated into the Scheme design to avoid and reduce impacts on air quality, which are set out in the **Outline CEMP [EN010168/APP/7.12]** (including measures to control dust and vehicle emissions during construction); the **Outline CTMP [EN010168/APP/7.22]** (including measures to control construction traffic and worker vehicle numbers); the **Outline BSMP [EN010168/APP7.21]** (including measures to deal with emissions in the event of fire); the **Outline OEMP [EN010168/APP/7.13]** and the **Outline Decommissioning Strategy [EN010168/APP/7.14]** (which both include the same air quality mitigation proposed in the Outline CEMP). These measures will be secured through Requirements in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].** The assessment set out in **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]** concludes that, with embedded mitigation, no likely significant effects are identified in relation to air quality as a result of the Scheme. No additional mitigation or monitoring is proposed.
Paragraph 5.2.18	Where a project is proposed near to a sensitive receptor site for air quality, if the applicant cannot provide justification for this location, and a suitable mitigation plan, the Secretary of State should refuse consent.	**ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]** identifies that there are air quality sensitive receptors within the general vicinity of the Scheme, due to its nature and scale. These include, inter alia, residential properties in Farleaze, Grittleton, Sevington, Chippenham, Corsham, Whitley, Gastard

Relevant Paragraph	Detail	Scheme Compliance
		and schools in Shaw, Yatton Keynell and Hullavington, however these receptors are not within the immediate vicinity of the Scheme. There are also ecological receptors in the vicinity of the Scheme. These include, inter alia, Surrendell Wood Ancient Woodland, Bincombe Wood Ancient Woodland, Harries Ground Rodbourne Site of Special Scientific Interest (SSSIs) and North Bincombe Wood Ancient Woodland. As set out in **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]** and **Planning Statement [EN010168/APP/7.2]**, embedded mitigation measures have been incorporated into the Scheme design to avoid and reduce impacts on air quality, which are set out in the **Outline CEMP [EN010168/APP/7.12]** (including measures to control dust and vehicle emissions during construction); the **Outline CTMP [EN010168/APP/7.22]** (including measures to control construction traffic and worker vehicle numbers); the **Outline BSMP [EN010168/APP7.21]** (including measures to deal with emissions in the event of fire); and the **Outline OEMP [EN010168/APP/7.13]** and **Outline Decommissioning Strategy [EN010168/APP/7.14]** (which both include the same air quality mitigation proposed in the Outline CEMP). These will be secured through Requirements in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].** The assessment concludes that, with embedded mitigation, no likely significant effects are identified in relation to air quality as a result of the Scheme. No additional mitigation or monitoring is proposed.

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 5.2.19	In all cases, the Secretary of State must take account of any relevant statutory air quality limits, objectives and targets. If a project will lead to non-compliance with a statutory limit, objective or target the Secretary of State should refuse consent.	The Scheme would not lead to a breach of any relevant statutory air quality thresholds or affect the ability of a non-compliant area to achieve compliance. As concluded in **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]** there are no significant effects anticipated on air quality as a result of the Scheme.
Greenhouse Gas Emissions		
Paragraph 5.3.4	All proposals for energy infrastructure projects should include a GHG assessment as part of their ES (See Section 4.3). This should include: • A whole life GHG assessment showing construction, operational and decommissioning GHG impacts, including impacts from change of land use. • An explanation of the steps that have been taken to drive down the climate change impacts at each of those stages. • Measurement of embodied GHG impact from the construction stage. • How reduction in energy demand and consumption during operation has been prioritised in comparison with other measures. • How operational emissions have been reduced as much as possible through the application of best available techniques for that type of technology. • Calculation of operational energy consumption and associated carbon emissions.	**ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** presents a lifecycle greenhouse gas (GHG) impact assessment, which assesses the significance of the GHG impacts on climate over the lifetime of the Scheme (construction, operation, maintenance, and decommissioning). Section 7.9 of **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** sets out the embedded measures that have been incorporated into the Scheme to reduce climate change impacts. Embedded mitigation measures are set out in the **Outline CEMP [EN010168/APP/7.12], Outline OEMP [EN010168/APP/7.13]** and the **Outline Site Waste Management Plan [EN010168/APP/7.16]**. These will be secured through Requirements in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]** Mitigation measures include (but are not limited to): • Designing, constructing and implementing the Scheme in such a way as to minimise the creation of waste and maximise the use of

Relevant Paragraph	Detail	Scheme Compliance
	• 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.	alternative materials with lower embodied carbon, such as locally sourced products and materials with a higher recycled content where feasible; • Switching vehicles and plant off when not in use and ensuring construction vehicles conform to current UK emissions standards; • Conducting regular planned maintenance of the construction plant and machinery to optimise efficiency; • Using equipment's cooling systems where necessary/adapting working practices and equipment used based on current weather conditions; • Battery Energy Storage System (BESS) systems include Heating, Ventilation and Cooling (HVAC) systems and these to be contained within the individual equipment containers. **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** sets out that renewable energy generation from the Scheme during the first year of operation is estimated to be around 415,000MWh/year if tracker panels are used and around 438,000MWh/year if fixed panels are implemented The total energy generated by the Scheme would be around 23.54TWh and 24.26TW over the 60-year Scheme lifespan for tracker and fixed panels respectively. Accounting for the estimated construction phase and operation phase emissions, the Scheme's

Relevant Paragraph	Detail	Scheme Compliance
		total carbon intensity value is 39.63gCO2e/kWh for tracker panels and 38.46gCO2e/kWh for fixed panels. **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** concludes that the findings of the GHG assessment indicate that the Scheme will yield beneficial impacts and achieve a net reduction in GHG emissions, compared to a scenario without the Scheme. Furthermore, **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** also concludes that the Scheme's design and integrated mitigation measures effectively address climate change risks and that no significant climate change risks during the construction, operation and maintenance or decommissioning phase have been identified.
Paragraph 5.3.5	A GHG assessment should be used to drive down GHG emissions at every stage of the proposed development and ensure that emissions are minimised as far as possible for the type of technology, taking into account the overall objectives of ensuring our supply of energy always remains secure, reliable and affordable, as we transition to net zero.	**ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** presents a lifecycle greenhouse gas (GHG) impact assessment, which assesses the significance of the GHG impacts on climate over the lifetime of the Scheme (construction, operation, maintenance, and decommissioning). **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** concludes that the findings of the GHG assessment indicate that the Scheme will yield beneficial impacts and achieve a net reduction in GHG emissions, compared to a scenario without the Scheme. Over the Scheme's lifespan, which is estimated to be 60 years for the purpose of this assessment, it is estimated the Scheme will result in a net saving of 218,611 tCO2e if tracker panels are used or 253,839 tCO2e for fixed

Relevant Paragraph	Detail	Scheme Compliance
		panels in comparison with a scenario whereby the Scheme does not come into effect and emissions from the grid in the baseline year of operation were used. The **Outline CEMP [EN010168/APP/7.12]** and **Outline OEMP [EN010168/APP/7.13]** detail the measures incorporated in the Scheme to drive down GHG emissions during the construction and operation of the Scheme. These will be secured through Requirements in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].** These include (but are not limited to): • Designing, constructing and implementing the Scheme in such a way as to minimise the creation of waste and maximise the use of alternative materials with lower embodied carbon, such as locally sourced products and materials with a higher recycled content where feasible; • Switching vehicles and plant off when not in use and ensuring construction vehicles conform to current UK emissions standards; • Conducting regular planned maintenance of the construction plant and machinery to optimise efficiency; • Using equipment's cooling systems where necessary/adapting working practices and equipment used based on current weather conditions; and

Relevant Paragraph	Detail	Scheme Compliance
		• Battery Energy Storage System (BESS) systems include Heating, Ventilation and Cooling (HVAC) systems and these to be contained within the individual equipment containers.
Paragraph 5.3.6	Applicants should look for opportunities within the proposed development to embed nature-based or technological solutions to mitigate or offset the emissions of construction and decommissioning.	The Scheme incorporates nature-based solutions into its design. The rationale for all nature-based mitigation is set out in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168APP/6.1]**, with enhancements further detailed in the **Outline LEMP [EN010168/APP/7.18]**. Measures include substantial new hedgerow and tree planting, reinforcement planting at existing hedgerows and field boundaries, extensive grassland habitat creation and sympathetic management both within buffers and within the arrays, as well as discrete, valuable habitat creation (e.g. ponds and meadows) in appropriate locations.
Paragraph 5.3.7	Steps taken to minimise and offset emissions should be set out in a GHG Reduction Strategy, secured under the Development Consent Order. The GHG Reduction Strategy should consider the creation and preservation of carbon stores and sinks including through woodland creation, hedgerow creation and restoration, peatland restoration and through other natural habitats.	The relevant measures which form the GHG Reduction Strategy are set out in the **Outline CEMP [EN010168/APP/7.12]** and **Outline OEMP [EN010168/APP/7.13]** which are in turn secured under Requirements in Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**, rather than as a standalone document. Measures to mitigate against GHG emissions from waste are included, such as adopting the Considerate Constructors Scheme (CCS) to assist in reducing pollution, including GHGs, from the Scheme by employing good industry standard practice measures,

Relevant Paragraph	Detail	Scheme Compliance
		e.g., recycling and separating waste and choosing low carbon and recyclable materials where feasible. Further measures to reduce GHG emissions from construction traffic and equipment such as, reusing suitable infrastructure and resources already available within the Sites where practicable to minimise the use of natural resources and unnecessary materials (e.g. reusing excavated soil for fill requirements),and encouraging the use of lower carbon modes of transport by identifying and communicating local bus connections and pedestrian and cycle access routes to/ from the Scheme to all construction staff, and providing appropriate facilities for the safe storage of cycles, are also included in the **Outline CTMP [EN010168/APP/7.22]**.
Paragraph 5.3.8	The Secretary of State must be satisfied that the applicant has as far as possible assessed the GHG emissions of all stages of the development.	The Applicant has assessed the potential GHG emissions and effects throughout all stages of development (construction, operation and maintenance, and decommissioning) in **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]**. A GHG assessment has been undertaken and is presented in **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]**.
Paragraph 5.3.9	The Secretary of State should be content that the applicant has taken all reasonable steps to reduce the GHG emissions of the construction and decommissioning stage of the development.	The **Outline CEMP [EN010168/APP/7.12]** and **Outline OEMP [EN010168/APP/7.13]** detail the measures incorporated into the Scheme to reduce GHG emissions during the construction, operation and maintenance and decommissioning of the Scheme.

Relevant Paragraph	Detail	Scheme Compliance
		These will be secured through Requirements in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].**
Paragraph 5.3.10	The Secretary of State should give appropriate weight to projects that embed nature-based or technological processes to mitigate or offset the emissions of construction and decommissioning within the proposed development. However, in light of the vital role energy infrastructure plays in the process of economy wide decarbonisation, the Secretary of State must accept that there are likely to be some residual emissions from construction and decommissioning of energy infrastructure.	The Scheme incorporates nature-based solutions into its design. The rationale for all nature-based mitigation is set out in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168APP/6.1]**, with enhancements further detailed in the **Outline LEMP [EN010168/APP/7.18]**. Measures include substantial new hedgerow and tree planting, reinforcement planting at existing hedgerows and field boundaries, extensive grassland habitat creation and sympathetic management both within buffers and within the arrays, as well as discrete, valuable habitat creation (e.g. ponds and meadows) in appropriate locations. Further details on how the Scheme has sought to mitigate emissions of the construction and decommissioning of the Scheme in relation to emissions are included in the **Outline CEMP [EN010168/APP/7.12]** and the **Outline Decommissioning Strategy [EN010168/APP/7.14]**. These measures will be secured through Requirements in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].**
Biodiversity and Geological Conservation		
Paragraph 5.4.4	The highest level of biodiversity protection is afforded to sites identified through international conventions. The Habitats Regulations set out sites for which an HRA will assess the implications of a plan or project, including	The **Habitats Regulation Assessment Report [EN010168/APP/7.10]** assesses the implications of the Scheme on sites set out in the Habitats Regulations including SACs and SPAs. It concludes that with the adoption of mitigation measures, no adverse effects on site integrity of the Bath and Bradford-on-Avon Bats

Relevant Paragraph	Detail	Scheme Compliance
	Special Areas of Conservation and Special Protection Areas.	SAC, Severn Estuary SAC, Severn Estuary SPA or the Severn Estuary Ramsar site are deemed likely, either in isolation or in combination with other projects. These mitigation measures include, for the Bath and Bradford-on-Avon Bats SAC, the sensitive siting of Temporary Construction Compounds outside of Core Areas/Impact Zones, the narrowing of construction widths at field boundary habitats within the Cable Route Corridor to avoid fragmentation of habitat, and adequate mitigation for loss of potential bat roost sites to avoid killing/injury to individual bats and no net loss of roost sites. For the Seven Estuary Ramsar, mitigation includes the adoption of trenchless techniques (e.g. HDD) for cable installation crossing watercourses likely to be used by qualifying fish species, and the burial of cables under watercourses to sufficient depths to minimise potential risks of EMFs impacts sensitive fish species.
Paragraph 5.4.5	As a matter of policy, the following should be given the same protection as sites covered by the Habitats Regulations and an HRA will also be required: (a) potential Special Protection Areas and possible Special Areas of Conservation; (b) listed or proposed Ramsar sites; and (c) sites identified, or required, as compensatory measures for adverse effects on any of the other sites covered by this paragraph.	The **Habitats Regulation Assessment Report [EN010168/APP/7.10]** identifies SPAs, SACs and Ramsar sites (referred to as 'European sites') which could be affected by the Scheme. There are no European Sites within the Order Limits or within 10km of the Solar PV Sites, but five sites were identified in the wider area, being the Bath and Bradford on Avon, Bats SAC, the Severn Estuary SAC, the Severn Estuary SPA, the Severn Estuary Ramsar, and the Salisbury Plain SPA.

Relevant Paragraph	Detail	Scheme Compliance
		Following the adoption of mitigation measures, no significant adverse effects on the site integrity of any SACs, SPAs or Ramsar sites as a result of the Scheme.
Paragraph 5.4.8	Development on land within or outside a SSSI, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits (including need) of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of SSSIs.	**ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** sets out an assessment of the likely impacts and effects of the Scheme on national statutory designated sites for nature conservation, including Harries Ground, Rodbourne SSSI, which is located immediately adjacent to Lime Down E and Sutton Lane SSSI, which is located 3.67 km south of Lime Down E. The assessment concludes, given the lack of impacts pathways between the Scheme and any SSSIs following implementation of embedded mitigation measures, no significant effects are anticipated on any SSSIs during the construction, operation and maintenance, and decommissioning of the Scheme.
Paragraph 5.4.12	Sites of regional and local biodiversity and geological interest, which include Regionally Important Geological Sites, Local Nature Reserves and Local Wildlife Sites, are areas of substantive nature conservation value and make an important contribution to ecological networks and nature's recovery. They can also provide wider benefits including public access (where agreed), climate mitigation and helping to tackle air pollution.	**ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** includes an assessment of the likely impacts and effects of the Scheme on non-statutory sites designated for nature conservation, including Local Nature Reserves (LNR) and Local Wildlife Sites (LWS). There is potential for chemical spills and surface runoff into watercourses during the construction phase, which

Relevant Paragraph	Detail	Scheme Compliance
		may subsequently degrade the habitats present within these sites, should they be hydrologically connected to the watercourses present within and adjacent to the Scheme. However, embedded mitigation measures are incorporated into the **Outline CEMP [EN010168/APP/7.12]**, secured through Requirement 13 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1],** to manage run-off and chemical spillages during the construction phase which include storing chemicals in accordance with their Control of Substances Hazardous to Health (COSHH) guidelines, whilst spill kits will be provided in areas of fuel/oil/minor chemicals storage; an Emergency Spillage Plan will be produced, which site staff will have read and confirmed that they understand, via the site induction; and measures to limit the mobilisation of sediments and run-off, such as when working in very wet conditions or the use of silt fencing when working in ditches or watercourses. The assessment concludes, given the lack of impacts pathways between the Scheme and any non-designated nature sites following implementation of embedded mitigation measures, no significant effects are anticipated during the construction, operation and maintenance, and decommissioning of the Scheme.
Paragraph 5.4.15	Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Keepers of Time, the government's policy for ancient and native trees and woodlands in England sets	**ES Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1]** provides an assessment of the likely significant effects on trees, including any ancient woodland impacted by the Scheme.

Relevant Paragraph	Detail	Scheme Compliance
	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.	**ES Volume 3, Appendix 10-1: Arboricultural Impact Assessment and Outline Arboricultural Method Statement [EN010168/APP/6.3]** identifies that there are no ancient woodland or ancient trees, and 51 veteran trees within the Order Limits. Six areas of ancient woodland lie adjacent to the Order Limits. Low impacts have been identified to trees on the edge of one Ancient Woodland, North Bincombe Wood. A 242m section of internal access track is proposed within the 15m wide Ancient Woodland Buffer Zone of North Bincombe Wood in Lime Down E. No tree removal is anticipated to be required and as only a very small number of trees on the edges of the Ancient Woodland will be potentially impacted, and these trees are confirmed to not be veteran trees, no significant impacts are anticipated. All other proposed Scheme elements within the Sites are located beyond the 15m wide Ancient Woodland Buffer Zones. Dust and sediment controls will be in place for relevant works near ancient woodland as set out in the **Outline CEMP [EN010168/APP/7.12]** secured through Requirement 13 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**.
Paragraph 5.4.17	Where the development is subject to EIA, the applicant should ensure that the ES clearly sets out any effects on internationally, nationally, and locally designated sites of ecological or geological conservation importance (including those outside England), on protected species and on habitats and other species identified as being of principal importance for the	Section 9.10 of **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** sets out the effects on the scheme on internationally, nationally and locally designated sites of ecological conservation importance, protected species and on habitats and other species identified as being of principal

Relevant Paragraph	Detail	Scheme Compliance
	conservation of biodiversity, including irreplaceable habitats.	importance for the conservation of biodiversity, including irreplaceable habitats. **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** confirms that there are no significant adverse effects anticipated on national or local sites for nature conservation. It is acknowledged that the Scheme is likely to result in residual adverse significant effects in relation to hedgerows in the Cable Route Corridor and on ground nesting birds at the Solar PV Sites. However, the residual significant adverse effects are limited to site and local level and are far outweighed by the residual significant beneficial effects anticipated in relation to habitats and other species, together with the overwhelming need for and other benefits of the Scheme.
Paragraph 5.4.19	The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests.	**ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** sets out that the design of the Scheme has evolved to avoid impacts and effects on ecology and biodiversity as far as practicable. The Scheme incorporates a number of enhancements resulting in a number of significant beneficial effects including (but not limited to): • Overall significant beneficial effects at local level on grassland and various species as a result of the reversion of the arable fields which currently dominate the Solar PV Sites to grassland for the lifetime of the Scheme;

Relevant Paragraph	Detail	Scheme Compliance
		• Significant long term beneficial effects at local level in relation to hedgerow and woodland habitats, as a result of the proposed hedgerow, woodland and tree planting set out in the **Outline LEMP [EN010168/APP/7.18]** secured through Requirement 7 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].**; • A significant beneficial effect at site-to-local level on the extent of standing water habitat as a result of the creation of new ponds. Details of the proposed ponds are set out in **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2]** and measures for their creation are set out in the **Outline LEMP [EN010168/APP/7.18]**; and • A significant beneficial effect at site level on the quality of the local ditch and watercourse network.
Paragraph 5.4.20	Applicants should consider wider ecosystem services and benefits of natural capital when designing enhancement measures.	**ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** sets out that the design of the Scheme has evolved to avoid impacts and effects on ecology and biodiversity as far as practicable. The Scheme incorporates a number of enhancements resulting in a number of significant beneficial effects including (but not limited to): • Overall significant beneficial effects at local level on grassland and various species as a result of the reversion of the arable fields which

Relevant Paragraph	Detail	Scheme Compliance
		currently dominate the Solar PV Sites to grassland for the lifetime of the Scheme; • Significant long term beneficial effects at local level in relation to hedgerow and woodland habitats, as a result of the proposed hedgerow, woodland and tree planting outlined in the **Outline LEMP [EN010168/APP/7.18]** secured through Requirement 7 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].**; • A significant beneficial effect at site-to-local level on the extent of standing water habitat as a result of the creation of new ponds. Details of the proposed ponds are set out in **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2]** and measures for their creation are set out in the **Outline LEMP [EN010168/APP/7.18]**; and • A significant beneficial effect at site level on the quality of the local ditch and watercourse network. The Scheme also achieves biodiversity net gain on site as demonstrated in the **BNG Assessment Report [EN010168/APP/7.8]**.
Paragraph 5.4.21	As set out in Section 4.7, the design process should embed opportunities for nature inclusive design. Energy infrastructure projects have the potential to deliver significant benefits and enhancements beyond Biodiversity Net Gain, which result in wider environmental gains (see Section 4.6 on Environmental	The Scheme has been designed to retain the most valuable habitats and protect these through nature inclusive design such as undeveloped buffer zones during construction and operation and through the decommissioning of the Scheme. The layout of ecological buffers is provided **in ES Volume 3,**

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	and Biodiversity Net Gain). The scope of potential gains will be dependent on the type, scale, and location of each project.	**Appendix 9.9: Schedule of Protective Ecological Buffers [EN010168/APP/6.3]** and will be secured through implementation of the **Outline EPMS [EN010168/APP/7.19]** and the **Outline LEMP [EN010168/APP/7.18]** secured through Requirements 7 and 8 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].**. These buffers include: • 8 m minimum from ditches; • 10 m minimum from ditches with signs of water vole, ponds where GCN are absent, 'outlying' or 'annexe' badger sett, or individual trees. • 15 m minimum from all woodland, hedgerows, lines of trees, and designated sites, as well as some minor watercourses depending on their ecological value; • 30 m minimum from 'main' or 'subsidiary' badger setts; and • 50 m from ponds with confirmed evidence of GCN, or where the presence of great crested newts has been assumed due to inconclusive results. As set out in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**, significant long term beneficial effects are anticipated at local level in relation to hedgerow and woodland habitats, as a result of the proposed hedgerow, woodland and tree planting.
Paragraph 5.4.22	The design of energy NSIP proposals will need to consider the movement of mobile/migratory species	As set out in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** the Scheme has

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	such as birds, fish and marine and terrestrial mammals and their potential to interact with infrastructure. As energy infrastructure could occur anywhere within England and Wales, both inland and onshore and offshore, the potential to affect mobile and migratory species across the UK and more widely across Europe (transboundary effects) requires consideration, depending on the location of development.	considered the impact on the movement of mobile/migratory species such as birds, fish and marine and terrestrial mammals and their potential to interact with infrastructure. Residual adverse significant effects are anticipated in relation to ground nesting birds at the Solar PV Sites. However, the residual significant adverse effects are limited to site and local level and are far outweighed by the residual significant beneficial effects anticipated in relation to habitats and other species, together with the overwhelming need for and benefits of the Scheme. The **Habitats Regulation Assessment Report [EN010168/APP/7.10] [EN010168/APP/7.10]** concludes that with the adoption of mitigation measures, there will be no significant adverse effects (alone or in combination) on internationally designated sites.
Paragraph 5.4.25	The applicant should seek the advice of the appropriate SNCB and provide the Secretary of State with such information as the Secretary of State may reasonably require, to determine whether an HRA Appropriate Assessment (AA) is required. Applicants can request and agree 'Evidence Plans' with SNCBs, which is a way to record upfront the information the applicant needs to supply with its application, so that the HRA can be efficiently carried out. If an AA is required, the applicant must provide the Secretary of State with such information as may reasonably be required to enable	The **Habitats Regulation Assessment Report [EN010168/APP/7.10] [EN010168/APP/7.10]** provides an Appropriate Assessment that sets out mitigation measures that are proposed on the Bath and Bradford-on-Avon bats SAC and Seven Estuary Ramsar during construction and decommissioning, and the Seven Estuary Ramsar during operation and maintenance. The Appropriate Assessment sets out mitigation measures where relevant in relation to: • Loss or change of functionally-linked land. • Fragmentation.

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	the Secretary of State to conduct the AA. This should include information on any mitigation measures that are proposed to minimise or avoid likely significant effects.	• Loss or damage to roosts. • Killing and injury The **Habitats Regulation Assessment Report [EN010168/APP/7.10] [EN010168/APP/7.10]** concludes that that with the adoption of mitigation measures, no adverse effects on site integrity of the Bath and Bradford-on-Avon Bats SAC, Severn Estuary SAC, Severn Estuary SPA or the Severn Estuary Ramsar site are deemed likely, either in isolation or in combination with other projects.
Paragraph 5.4.26	If, during the pre-application stage, the SNCB indicate that the proposed development is likely to adversely impact the integrity of habitat sites, the applicant must include with their application such information as may reasonably be required to assess a potential derogation under the Habitats Regulations.	A **Habitats Regulation Assessment Report [EN010168/APP/7.10] [EN010168/APP/7.10]** has been submitted as part of the DCO application and concludes that with the adoption of mitigation measures, no adverse effects on site integrity of the Bath and Bradford-on-Avon Bats SAC, Severn Estuary SAC, Severn Estuary SPA or the Severn Estuary Ramsar site are deemed likely, either in isolation or in combination with other projects.
Paragraph 5.4.29	It is vital that applicants consider the need for compensation as early as possible in the design process as 'retrofitting' compensatory measures will introduce delays and uncertainty to the consenting process.	The **Habitats Regulation Assessment Report [EN010168/APP/7.10] [EN010168/APP/7.10]** and **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** conclude that there will be no significant effects to European or internally designated sites as a result of the construction, operation and maintenance, or decommissioning of the Scheme. Therefore, there are no environmental compensation requirements to be considered.

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Paragraph 5.4.30	Applicants should work closely at an early stage in the pre-application process with SNCB and Defra/Welsh Government to develop a compensation plan for all protected sites adversely affected by the development. 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.	As set out in Table 9-2 of **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** the Applicant has engaged with Natural England from an early stage in the pre-application process including agreement of the statutory sites that should be considered within the HRA and mitigation measures that may be implemented to avoid significant effects to these sites. Natural England has reviewed the **Habitats Regulation Assessment Report [EN010168/APP/7.10]** and it has also been shared with Wiltshire Council prior to submission of the DCO Application.
Paragraph 5.4.32	Applicants should include measures to mitigate fully the direct and indirect effects of development on ancient woodland, ancient and veteran trees or other irreplaceable habitats during both construction and operational phases.	The Scheme layout has been carefully designed to avoid veteran trees and embedded mitigation has been included such as tree buffer zones to avoid soil disturbance, micrositing to avoid root and canopy impacts, and demarcation fencing. **ES Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1]** sets out measures to mitigate the direct and indirect effects of development on ancient woodland, ancient and veteran trees or other irreplaceable habitats during the construction and operation phase of the Scheme, these include (but are not limited to): • Cable Route Corridor design work has been undertaken in order to retain, avoid and fully protect identified veteran trees to provide sufficient space to allow for open cut trenching around veteran tree buffer zones ensuring impacts to veteran trees are avoided.

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		• Micro-siting will be employed to avoid the removal or occurrence of root or canopy impacts to veteran trees within the Cable Route Corridor. • Tree removal along the Cable Route Corridor will preferentially target trees of lower quality over those of higher quality. Veteran trees will not be removed in the Cable Route Corridor. • Temporary construction compounds will be sited outside of the canopy spreads and RPAs of adjacent trees and woodlands. • Permanent access points and visibility splays for the Solar PV Site will be the same as those used for construction, ensuring no additional tree removal or pruning during operation of the Sites. Mitigation measures are set out in the **Outline CEMP [EN010168/APP/7.12]** secured through Requirement 13 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].**
Paragraph 5.4.33	Applicants should consider any reasonable opportunities to maximise the restoration, creation, and enhancement of wider biodiversity, and the protection and restoration of the ability of habitats to store or sequester carbon as set out under Section 4.6.	**ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** sets out that following the implementation of embedded and additional mitigation, no significant effects are identified on any statutory or non-statutory sites designated for nature conservation. **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** sets out that enhancement measures have been identified to contribute to and

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		strengthen the connectivity between a number of the Local Wildlife Sites located close to the Solar PV Sites and the local landscape. This will be achieved through the provision of new hedgerows, tree and woodland planting in the vicinity of the sites, and through the creation of areas of species rich grassland and scrub planting within the Solar PV Sites, which may provide ecological 'stepping stones' for various species within the local, largely arable landscape. These enhancement measures are outlined in the **Outline LEMP [EN010168/APP/7.18]**, to be secured through Requirement 7 in Schedule 2 in the **Draft DCO [EN010168/APP/3.1]**.
Paragraph 5.4.35	Applicants should include appropriate avoidance, mitigation, compensation and enhancement measures as an integral part of the proposed development. In particular, the applicant should demonstrate that: • during construction, they will seek to ensure that activities will be confined to the minimum areas required for the works • the timing of construction has been planned to avoid or limit disturbance • during construction and operation best practice will be followed to ensure that risk of disturbance or damage to species or habitats is minimised, including as a consequence of transport access arrangements • habitats will, where practicable, be restored after construction works have finished	**ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** sets out avoidance measures, embedded mitigation measures (Section 9.9), and additional mitigation measures (Section 9.12) in relation to habitats and species Through these measures, the Applicant has demonstrated the following: • Construction activities confined to the minimum areas required for the works through micro-siting of the Cable Route Corridor. • Measures have been incorporated into the **Outline EPMS [EN010168/APP/7.19]** including sensitive seasonal timing of works. This will be secured through Requirement 8 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].** • As outlined in the **Outline CEMP [EN010168/APP/7.12],** secured through

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	• 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.	Requirement 7 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1],** an Environmental Manager will be responsible for the overall management of environmental aspects on site, ensuring environmental legislation and best practices are complied with, and environmental mitigation and monitoring measures identified are implemented**.** • The Scheme proposes to deliver substantial new hedgerow and tree planting, reinforcement planting at existing hedgerows and field boundaries, extensive grassland habitat creation and sympathetic management both within buffers and under the Solar PV arrays, as well as discrete, valuable habitat creation away from the Solar PV Panels.
Paragraph 5.4.36	Applicants should produce and implement a Biodiversity Management Strategy as part of their development proposals. This could include provision for biodiversity awareness training to employees and contractors so as to avoid unnecessary adverse impacts on biodiversity during the construction and operation stages.	The management of biodiversity throughout the lifetime of the Scheme is set out in the **Outline CEMP [EN010168/APP/7.12]**, **Outline OEMP [EN010168/APP/7.13]**, **Outline Decommissioning Strategy [EN010168/APP/7.14]**, and the **Outline EPMS [EN010168/APP/7.19]** secured through Requirements in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**. The **Outline EPMS [EN010168/APP/7.19]** secured through Requirement 8 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1],** sets out that an Ecological Clerk of Works (EcoCoW) will be appointed to each of the Solar PV Sites and Cable Route Corridor teams

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		and will comprise a suitably qualified ecologist with at least five years' relevant experience. The EcoCoW(s) will assist and advise the Applicant and the Site Manager(s) in their adherence to the requirements of the final EPMS.
Paragraph 5.4.39	The government's 25 Year Environment Plan and the Environment Act 2021 mark a step change in ambition for wildlife and the natural environment. The Secretary of State should have regard to the aims and goals of the government's Environmental Improvement Plan 2023, and in Wales the objectives of the Nature Recovery Plan, and any relevant measures and targets, including statutory targets set under the Environment Act or elsewhere.	**ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** has been produced with regard to the aims of the 25 Year Environment Plan. This is evidenced by the extensive habitat to be produced as detailed in the **Outline LEMP [EN010168/APP/7.18]** secured through Requirement 7 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**. The Applicant has also considered the requirements of the Environment Act 2021, and biodiversity net gain is proposed as part of the Scheme, as set out in the **Biodiversity Net Gain Assessment Report [EN01068/APP/7.8]**.
Paragraph 5.4.41	The benefits of nationally significant low carbon energy infrastructure development may include benefits for biodiversity and geological conservation interests and these benefits may outweigh harm to these interests. The Secretary of State may take account of any such net benefit in cases where it can be demonstrated.	The Scheme has the potential to deliver biodiversity benefits as a result of the embedded mitigation and enhancement measures as set out in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** and **Outline LEMP [EN010168/APP/7.18]**, secured through Requirement 7 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**. The **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]** sets out how a minimum of 10%

Relevant Paragraph	Detail	Scheme Compliance
		net gain will be achieved for the Scheme (using the Defra Statutory Biodiversity Metric). The **BNG Assessment Report [EN010168/APP/7.8]** demonstrates that the Scheme has achieves biodiversity net gain on site, which will be secured by Requirement 9 under Schedule 2 of the **Draft DCO [EN010168/APP/3.1].**
Paragraph 5.4.42	As a general principle, and subject to the specific policies below, development should, in line with the mitigation hierarchy, aim to avoid significant harm to biodiversity and geological conservation interests, including through consideration of reasonable alternatives (as set out in Section 4.3 above). Where significant harm cannot be avoided, impacts should be mitigated and as a last resort, appropriate compensation measures should be sought.	**ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** sets out that following the implementation of embedded and additional mitigation, no significant effects are identified on any statutory or non-statutory sites designated for nature conservation. The Scheme has been designed to retain the most valuable habitats and protect these through nature inclusive design such as undeveloped buffer zones during construction and operation and through the decommissioning of the Scheme. Following additional mitigation outlined in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** significant effects are anticipated on hedgerows within the Cable Route Corridor through temporary loss of habitat, and breeding birds through displacement of ground nesting birds from Solar PV Sites. However, the residual significant adverse effects are limited to site and local level and are far outweighed by the residual significant beneficial effects anticipated in relation to habitats and other species,

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		together with the overwhelming need for and benefits of the Scheme. Mitigation measures are set out in the **Outline CEMP [EN010168/APP/7.12]**, **Outline OEMP [EN010168/APP/7.13] Outline Decommissioning Strategy [EN010168/APP/7.14]**, and the **Outline EPMS [EN010168/APP/7.19].** These will be secured through Requirements in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].**
Paragraph 5.4.43	If significant harm to biodiversity resulting from a development cannot be avoided (for example through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then the Secretary of State will give significant weight to any residual harm.	Following additional mitigation outlined in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** significant effects are anticipated on the following: • Hedgerows within the Cable Route Corridor, where it is anticipated there will be temporary loss of habitat. However, the residual significant adverse effect is short term in nature and limited to a local level; and • Breeding birds – ground nesting birds of open habitats, where it anticipated there will be displacement of ground nesting birds from the Solar PV Sites. This is assessed to result in a residual significant adverse effect at local level for skylark, and a residual significant adverse effect at site level for yellow wagtail, corn bunting, grey partridge and quail. The residual significant adverse effects are limited to site and local level and are far outweighed by the

Relevant Paragraph	Detail	Scheme Compliance
		residual significant beneficial effects anticipated in relation to habitats and other species, together with the overwhelming need for and other benefits of the Scheme. Mitigation measures are set out in the **Outline CEMP [EN010168/APP/7.12]**, **Outline OEMP [EN010168/APP/7.13] Outline Decommissioning Strategy [EN010168/APP/7.14]**, and the **Outline EPMS [EN010168/APP/7.19].** These will be secured through Requirements in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].** The Scheme also achieves biodiversity net gain on site as demonstrated in the **BNG Assessment Report [EN010168/APP/7.8]**.
Paragraph 5.4.44	The Secretary of State should consider what appropriate requirements should be attached to any consent and/or in any planning obligations entered into, in order to ensure that any mitigation or biodiversity net gain measures, if offered, are delivered and maintained. Any habitat creation or enhancement delivered including linkages with existing habitats for compensation or biodiversity net gain should generally be maintained for a minimum period of 30 years, or for the lifetime of the project, if longer	Measures to mitigate any biodiversity impacts during the construction, operation and maintenance, and decommissioning phases of the Scheme are set out in the **Outline CEMP [EN010168/APP/7.12]**, **Outline OEMP [EN010168/APP/7.13]** and the **Outline Decommissioning Strategy [EN010168/APP/7.14]**. The **Outline EPMS [EN010168/APP/7.19]** also sets out ecological protection measures for undertaking the construction works associated with the Scheme. These documents will be developed into further detail and secured by Requirements under Schedule 2 of the **Draft DCO [EN010168/APP/3.1].**

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		The **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]** sets out how a minimum of 10% net gain will be achieved for the Scheme (using the Defra Statutory Biodiversity Metric), which will be secured by Requirement 9 under Schedule 2 of the **Draft DCO [EN010168/APP/3.1].**
Paragraph 5.4.46	Development proposals provide many opportunities for building-in beneficial biodiversity or geological features as part of good design. The Secretary of State should give appropriate weight to environmental and biodiversity enhancements, although any weight given to gains provided to meet a legal requirement (for example under the Environment Act 2021) is likely to be limited.	As detailed in the **Design Approach Document [EN010168/APP/7.3]** and Section 2 of the Planning Statement, the Scheme has undergone an iterative design process which has resulted in the delivery of a functional and efficient Scheme design which will deliver large amounts of renewable and low carbon energy while being sensitive to local context and surroundings, and minimising impacts on the environment as far as practicable. The Scheme incorporates a number of ecological enhancements resulting in a number of significant beneficial effects including (but not limited to): • Overall significant beneficial effects at local level on grassland and various species as a result of the reversion of the arable fields which currently dominate the Solar PV Sites to grassland for the lifetime of the Scheme; • Significant long term beneficial effects at local level in relation to hedgerow and woodland habitats, as a result of the proposed hedgerow, woodland and tree planting outlined in the **Outline LEMP [EN010168/APP/7.18]** secured through Requirement 7 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**;

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		• A significant beneficial effect at site-to-local level on the extent of standing water habitat as a result of the creation of new ponds. Details of the proposed ponds are set out in **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2]** and measures for their creation are set out in the **Outline LEMP [EN010168/APP/7.18]**; and • A significant beneficial effect at site level on the quality of the local ditch and watercourse network. The **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]** sets out how a minimum of 10% net gain will be achieved for the Scheme (using the Defra Statutory Biodiversity Metric).
Paragraph 5.4.47	When considering proposals, the Secretary of State should maximise such reasonable opportunities in and around developments, using requirements or planning obligations where appropriate. This can help towards delivering biodiversity net gain as part of or in addition to the approach set out at Section 4.6.	The **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]** sets out how a minimum of 10% net gain will be achieved for the Scheme (using the Defra Statutory Biodiversity Metric). The **BNG Report [EN010168/APP/7.8]** demonstrates that the Scheme has the potential to achieve significant biodiversity net gain on site, which will be secured by Requirement 9 under Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**.
Paragraph 5.4.48	In taking decisions, the Secretary of State should ensure that appropriate weight is attached to designated sites of international, national, and local importance; protected species; habitats and other species of principal importance for the conservation of	**ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** sets out an assessment of the likely impacts and effects of the Scheme on national statutory designated sites for nature conservation, including Harries Ground SSSI and Sutton Lane SSSI.

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	biodiversity; and to biodiversity and geological interests within the wider environment.	The assessment concludes, given the lack of impacts pathways between the Scheme and any SSSIs following implementation of embedded mitigation measures set out in the **Outline CEMP [EN010168/APP/7.12]**, **Outline OEMP [EN010168/APP/7.13]**, and **Outline Decommissioning Strategy [EN010168/APP/7.14]**, no significant effects are anticipated on any SSSIs during the construction, operation and maintenance, and decommissioning of the Scheme. These will be secured through Requirements in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].** As set out in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**, the Scheme is likely to result in residual adverse significant effects in relation to hedgerows in the Cable Route Corridor and on ground nesting birds at the Solar PV Sites. However, the residual significant adverse effects are limited to site and local level and are far outweighed by the residual significant beneficial effects anticipated in relation to habitats and other species, together with the overwhelming need for and other benefits of the Scheme.
Paragraph 5.4.49	The Secretary of State must consider whether the project is likely to have a significant effect on a protected site which is part of the National Site Network (a habitat site), a protected marine site, or on any site to which the same protection is applied as a matter of	The **Habitats Regulation Assessment Report [EN010168/APP/7.10] [EN010168/APP/7.10]** and **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** conclude that there will be no significant effects to European or internally designated sites as a result of the construction, operation and

Relevant Paragraph	Detail	Scheme Compliance
	policy, either alone or in combination with other plans or projects.	maintenance, or decommissioning of the Scheme. Therefore, there are no environmental compensation requirements to be considered.
Paragraph 5.4.50	The Secretary of State should use requirements and/or planning obligations to mitigate the harmful aspects of the development and, where possible, to ensure the conservation and enhancement of the site's biodiversity or geological interest.	Details of how the Scheme has sought to avoid harm to biodiversity and incorporate opportunities to conserve and enhance biodiversity are set out in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**. This includes the measures embedded into the Scheme design, including proposed hedgerow, woodland and tree planting, and creation of new ponds. These are set out in Section 9.9 and secured through implementation of the **Outline EPMS [EN010168/APP/7.19]** and the **Outline LEMP [EN010168/APP/7.18]**. These measures will be secured through Requirements in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].**
Paragraph 5.4.52	The Secretary of State should give due consideration to regional or local designations. However, given the need for new nationally significant infrastructure, these designations should not be used in themselves to refuse development consent.	Section 9.10 of **Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** provides an assessment of the likely impacts and effects of the Scheme on regional and local designations. It concludes that following the implementation of mitigation measures set out in Section 9.9, and those within the **Outline LEMP [EN010168/APP/7.18]**, there will be no significant effects to these designations. This will be secured through Requirement 7 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].**
Paragraph 5.4.53	The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran	**ES Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1]** reports the Applicant's assessment of likely significant effects on trees. The Scheme layout has been carefully designed to avoid

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	trees unless there are wholly exceptional reasons and a suitable compensation strategy exists.	veteran trees and embedded mitigation has been included such as tree buffer zones to avoid soil disturbance, micrositing to avoid root and canopy impacts, and demarcation fencing. Dust and sediment controls will be in place for relevant works near ancient woodland as set out in the **Outline CEMP [EN010168/APP/7.12]**. This will be secured through Requirement 13 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].** No direct loss of category A trees or veteran trees will occur within the Solar PV Sites, with likely removals limited to category B and C trees/tree groups. Some tree removals may be required in the Cable Route Corridor, but this will preferentially target trees of lower quality and no ancient or veteran trees will be removed from the Cable Route Corridor. Some likely canopy/root impacts are highlighted in **ES Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1]** during construction. However, micro-siting will be employed to avoid the removal or occurrence of root or canopy impacts to veteran trees and high-quality category A trees within the Cable Route Corridor. Temporary construction compounds will be sited outside of the canopy spreads and RPAs of adjacent trees and woodlands. Overall, neutral and non-significant residual impacts are anticipated for all veteran trees and ancient woodlands at the Solar PV Sites with embedded mitigation measures in place.

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		The assessment further concludes that no significant residual effects are identified for all trees within the Cable Route Corridor during the operation stage of the Scheme.
Paragraph 5.4.54	The Secretary of State should ensure that species and habitats identified as being of importance for the conservation of biodiversity are protected from the adverse effects of development by using requirements, planning obligations, or licence conditions where appropriate.	**ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** sets out that the Scheme is likely to result in residual adverse significant effects in relation to hedgerows in the Cable Route Corridor and on ground nesting birds at the Solar PV Sites. However, the residual significant adverse effects are limited to site and local level and are far outweighed by the residual significant beneficial effects anticipated in relation to habitats and other species, together with the overwhelming need for and benefits of the Scheme.
Paragraph 5.4.55	The Secretary of State should refuse consent where harm to a protected species and relevant habitat would result, unless there is an overriding public interest and the other relevant legal tests are met. In this context the Secretary of State should give substantial weight to any such harm to the detriment of biodiversity features of national or regional importance or the climate resilience and the capacity of habitats to store carbon, which they consider may result from a proposed development.	**ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** provides that the Scheme is likely to result in residual adverse significant effects in relation to hedgerows in the Cable Route Corridor and on ground nesting birds at the Solar PV Sites. However, the residual significant adverse effects are limited to site and local level and are far outweighed by the residual significant beneficial effects anticipated in relation to habitats and other species, together with the overwhelming need for and other benefits of the Scheme. The **Statement of Need [EN010168/APP/7.1]** explains that the Scheme, if consented, will be a substantial infrastructure asset in the public interest, which will deliver large amounts of cheap, secure, and low carbon electricity which will help the UK achieve its Sixth Carbon Budget

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		commitments and stay on track to achieve net zero by 2050. In relation to legal tests, the **Habitats Regulation Assessment Report [EN010168/APP/7.10]** concludes no adverse effects on site integrity. In relation to the Water Framework Directive, the **Water Framework Directive (WFD) Assessment [EN010168/APP/7.11]** and concludes that, with the embedded and additional mitigation measures proposed, all identified effects on WFD designated waterbodies have been reduced to levels assessed as negligible or minor adverse. No residual effects are considered likely to result in deterioration of waterbody status or to prevent the achievement of relevant environmental objectives set out in the Severn River Basin Management Plan. On that basis, the Scheme is compliant with the objectives of the WFD. Therefore, it is considered that the relevant legal tests have been met. Furthermore, the **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]** sets out how a minimum of 10% net gain will be achieved for the Scheme (using the Defra Statutory Biodiversity Metric). This sets out the net gains in biodiversity that the Scheme will provide. The Scheme will deliver, as a minimum, 10% BNG, which is secured via Requirement 9 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**. The **BNG**

Relevant Paragraph	Detail	Scheme Compliance
		Assessment Report [EN010168/APP/7.8] indicates that BNG in excess of 10% will be achieved, with a total net gain of 63.80% for area habitat units, 19.35% for hedgerow units and 25.30% for watercourse units in relation to the Solar PV Sites. The total net gain for the whole Scheme (i.e. Solar PV Sites and Cable Route Corridor combined) is 34.75% for area habitat units, 12.31% for hedgerow units and 20.08% for watercourse units, as set out in the **BNG Assessment Report [EN010168/APP/7.8]**.
Aviation		
Paragraph 5.5.5	UK airspace is important for both civilian and military aviation interests. It is essential that new energy infrastructure is developed collaboratively alongside aerodromes, aircraft, air systems and airspace so that safety, operations and 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 urgent need for new energy developments, which bring about a wide range of social, economic and environmental benefits.	The Applicant consulted with the MoD, CAA and NATS as part of the statutory consultation and targeted consultation for the Scheme. The **Consultation Report Appendix G [EN010168/APP/5.1]** sets out how regard has been had to responses received by these bodies during statutory consultation, and the **Consultation Report Appendix I [EN010168/APP/5.1]** sets out how regard has been had to responses during targeted consultation.
Paragraph 5.5.37	Where the proposed development may affect the performance of civil or military aviation CNS, meteorological radars and/or other defence assets an assessment of potential effects should be set out in the ES (see Section 4.3).	Section 20.1 of **ES Volume 1, Chapter 20: Other Environmental Matters [EN01068/APP/6.1]** and **ES Volume 3, Appendix 20-4: Solar Photovoltaic Glint and Glare Study [EN010168/APP/6.3]** provide an assessment of the likely effects of the Scheme from

Relevant Paragraph	Detail	Scheme Compliance
		glint and glare on aviation. Embedded mitigation in respect of glint and glare includes the incorporation of anti-reflective coating on the Solar PV panels. With embedded mitigation measures in place, **ES Volume 1, Chapter 20: Other Environmental Matters [EN01068/APP/6.1]** concludes that there are no significant residual effects predicted. **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** includes aviation incidents in its assessment of potential impacts, and the chapter concludes that no likely significant major accidents and disaster effects are predicted to arise.
Paragraph 5.5.41	In addition, consideration of developments near aerodromes should take into account the following factors: • Bird Strike Risk – Aircraft are vulnerable to wildlife strike, in particular bird strike. Birds and other wildlife may be attracted to the vicinity of an aerodrome by various types of development, for example, large buildings with perching/roosting opportunities for birds. It is therefore important that infrastructure, buildings and other elements from energy installations, as well as environmental mitigation are designed in such a way so as not to increase the bird strike risk to the airport for developments within 13km (this can vary). • Building Induced Turbulence – If a significant building or structure is proposed close to the	In relation to the potential for bird strike, as shown on **ES Volume 2, Figure 3-4: Landscape and Ecological Mitigation Plan [EN010168/APP/6.2]** the managed arable land and the grassland areas are well distributed throughout the site which, along with ensuring the mitigation land is well integrated into its surroundings, is an approach that prevents bird flocking. There is not a substantial enough change likely to create a difference in the number or assemblages of birds to form flocks that are an obstacle to aircraft. Proposed new habitats likely to attract birds, such as hedgerows, woodland, trees, and managed arable areas are well dispersed across the Scheme and complement existing habitats typically present in the surrounding landscape, and there are no large wetland areas being created where birds may

Relevant Paragraph	Detail	Scheme Compliance
	airport/runways, there is potential for building induced turbulence/wind shear to be created which has the potential to impact on aircraft on take-off and landing. Studies may be required to identify the extent of any turbulence resulting from the energy infrastructure. • Thermal Plume Turbulence – This is caused under certain conditions by the release of hot air from a power plant equipped with a dry cooling system. The plumes generated by these facilities have the potential to create invisible turbulence that can affect the manoeuvrability of aircraft.	congregate and then take flight together which could cause an issue for aircraft. The Scheme does not propose any significant buildings or structures, therefore building induced turbulence has not been assessed. The Scheme does not propose any dry cooling systems and therefore thermal plume turbulence has not been assessed.
Paragraph 5.5.49	The Secretary of State should be satisfied that the effects on meteorological radars, civil and military aerodromes, aviation technical sites and other defence assets or operations have been addressed by the applicant and that any necessary assessment of the proposal on aviation, NSWWS or defence interests has been carried out.	Section 20.1 of **ES Volume 1, Chapter 20: Other Environmental Matters [EN01068/APP/6.1]** and **ES Volume 3, Appendix 20-4: Solar Photovoltaic Glint and Glare Study [EN010168/APP/6.3]** provide an assessment of the likely effects of the Scheme on aviation from glint and glare. With embedded mitigation measures in place, **ES Volume 1, Chapter 20: Other Environmental Matters [EN01068/APP/6.1]** concludes that there are no significant residual effects predicted. **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** includes aviation incidents in its assessment of potential impacts and the chapter concludes that no likely significant major accidents and disaster effects are predicted to arise.

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 5.5.50	In particular, the Secretary of State should be satisfied that the proposal has been designed, where possible, to minimise adverse impacts on the operation and safety of aerodromes and that realistically achievable mitigation is carried out on existing surveillance systems such as radar/tracking technologies. It is incumbent on Operators of aerodromes to regularly review the possibility of agreeing to make reasonable changes to operational procedures.	The Applicant consulted with the MoD, CAA and NATS as part of the statutory consultation and targeted consultation for the Scheme. The **Consultation Report Appendix G [EN010168/APP/5.1]** sets out how regard has been had to responses received by these bodies during statutory consultation, and the **Consultation Report Appendix I [EN010168/APP/5.1]** sets out how regard has been had to responses during targeted consultation. Section 20.1 of **ES Volume 1, Chapter 20: Other Environmental Matters [EN01068/APP/6.1]** and **ES Volume 3, Appendix 20-4: Solar Photovoltaic Glint and Glare Study [EN010168/APP/6.3]** provide an assessment of the likely effects of the Scheme on aviation. The following airfields were assessed: • Hullavington Airfield, approximately 1.1 km west; • Badminton Arfield, approximately 4.6 km west; • Langley House Airfield, approximately 5.2 km south; • Charlton Park Airfield, approximately 5.8 km northeast; and • Bowldown Farm Airfield, approximately 7 km northwest.

Relevant Paragraph	Detail	Scheme Compliance
		Solar reflections are predicted towards the approach paths and visual circuits (specified paths to be flown by aircraft operating in the vicinity of an aerodrome) at Hullavington Airfield however it is understood that flying activity ceased at this airfield in 2016, and it is now permanently closed. Solar reflections with 'potential for temporary after-image' are predicted towards receptors on the visual circuits (specified paths to be flown by aircraft operating in the vicinity of an aerodrome) at Badminton Airfield. The effects have been considered in an operational context and are considered to be operationally accommodatable. The impact is therefore not considered to be significant, and no mitigation is required. A low impact is also predicted towards aviation receptors associated with Langley House Airfield, Charlton Park Airfield and Bowldown Airfield, which are all beyond 5km from the Scheme. Detailed modelling has not been undertaken as it is considered that due to the distance between the Scheme and these airfields, and the runway configurations, effects are predicted to be a low impact. **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** includes aviation incidents in its assessment of potential impacts and the chapter concludes there would be no risks associated with an increased prevalence and/or severity of

Relevant Paragraph	Detail	Scheme Compliance
		aviation incidents as a result of the Scheme and the effects are not significant.
Paragraph 5.5.55	Lighting must also be designed in such a way as to ensure that there is no glare or dazzle to pilots and/or ATC, aerodrome ground lighting is not obscured and that any lighting does not diminish the effectiveness of aeronautical ground lighting and cannot be confused with aeronautical lighting. Lighting may also need to be compatible with night vision devices for military low flying purposes.	Temporary site lighting would be used during construction to enable safe working when natural lighting is insufficient. Mobile lighting towers with a power output of 8 kilo volt-amperes (kVA) would be used for construction work, along with lighting at the construction compounds whilst construction is underway. Measures to control lighting are set out in the **Outline CEMP [EN010168/APP/7.12]**, including measures to minimise lighting to that required for safe site operations, use of directional fittings to avoid light spill, and directing lighting into the Order Limits rather than towards the boundaries. The following airfields were assessed: Hullavington Airfield, approximately 1.1 km west; Badminton Arfield, approximately 4.6 km west; Langley House Airfield, approximately 5.2 km south; Charlton Park Airfield, approximately 5.8 km northeast; and Bowldown Farm Airfield, approximately 7 km northwest. Solar reflections are predicted towards the approach paths and visual circuits (specified paths to be flown by aircraft operating in the vicinity of an aerodrome) at Hullavington Airfield however it is understood that flying activity ceased at this airfield in 2016, and it is now permanently closed. Solar reflections with 'potential for temporary after-image' are predicted towards receptors on the visual circuits (specified

Relevant Paragraph	Detail	Scheme Compliance
		paths to be flown by aircraft operating in the vicinity of an aerodrome) at Badminton Airfield. The effects have been considered in an operational context and are considered to be operationally accommodatable. The impact is therefore not considered to be significant, and no mitigation is required. A low impact is also predicted towards aviation receptors associated with Langley House Airfield, Charlton Park Airfield and Bowldown Airfield, which are all beyond 5km from the Scheme. Detailed modelling has not been undertaken as it is considered that due to the distance between the Scheme and these airfields, and the runway configurations, effects are predicted to be a low impact.
Dust, Odour, Artificial Light, Smoke, Steam, and Insect Infestation		
Paragraph 5.7.5	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.	**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. It includes: • Dust generated during the construction, operation and maintenance and decommissioning phases. • Vehicle emissions during the construction, operation and maintenance and decommissioning phases. • Emissions from Non-Road Mobile Machinery (NRMM) (onsite plant) during the construction,

Relevant Paragraph	Detail	Scheme Compliance
		operation and maintenance and decommissioning phases. • Back-up generator emissions during the operation and maintenance phase. • Emissions generated in the event of a Battery Energy Storage System (BESS) fire during the operation and maintenance phase.
Paragraph 5.7.6	In particular, the assessment provided by the applicant should describe: • the type, quantity and timing of emissions • aspects of the development which may give rise to emissions • premises or locations that may be affected by the emissions • effects of the emission on identified premises or locations • measures to be employed in preventing or mitigating the emissions	The methodology used to assess air quality effects in Section 15.6 of **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]** sets out the receptors that may be impacted, including human and ecological receptors. The air quality effects are assessed in Section 15.10 of **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]** which concludes that, following the implementation of embedded mitigation measures, there are no significant effects on air quality as result of the Scheme. The mitigation measures embedded into the Scheme are set out in Section 15.9 of **ES Chapter 15: Air Quality [EN010168/APP/6.1]** and include: no bonfires or burning of waste materials, use of water-assisted dust sweeper(s) on the access and local roads, to remove, as necessary, any material tracked out of the site and implement a wheel washing system (with rumble grids to dislodge accumulated dust and mud prior to leaving the site where reasonably practicable); vehicle emissions control and operational standards for

Relevant Paragraph	Detail	Scheme Compliance
		construction plant and vehicles; signs to direct construction vehicles associated with the Scheme will be installed along the construction traffic route and a visual inspection of vehicles will be undertaken before they depart the Site, to ensure that they are not carrying any residual debris onto the highway; and the provision of shuttle buses to transport construction workers to and from the Order Limits and encouraging workers who drive to car share where practicable. These are set out in the **Outline CEMP [EN010168/APP/7.12]**; the **Outline Construction Traffic Management Plan [EN010168/APP/7.22]**; the **Outline BSMP [EN010168/APP/7.21]**; the **Outline OEMP [EN010168/APP/7.13]**; and the **Outline Decommissioning Strategy [EN010168/APP/7.14]**. These measures will be secured through Requirements in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].**
Paragraph 5.7.12	The Secretary of State should satisfy itself that: • an assessment of the potential for artificial light, dust, odour, smoke, steam and insect infestation to have a detrimental impact on amenity has been carried out • that all reasonable steps have been taken, and will be taken, to minimise any such detrimental impacts	**ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]** concludes that following the implementation of embedded mitigation measures there are no significant effects on air quality as result of the Scheme. The mitigation measures embedded into the Scheme are set out in Section 15.9 of **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]**. These include the implementation of commitments made in the **Outline CEMP [EN010168/APP/7.12]**; commitments

Relevant Paragraph	Detail	Scheme Compliance
		made in the **Outline Construction Traffic Management Plan [EN010168/APP/7.22]**; measures included in the **Outline BSMP [EN010168/APP/7.21]**; commitments made in the **Outline OEMP [EN010168/APP/7.13]**; and commitments made in the **Outline Decommissioning Strategy [EN010168/APP/7.14]**. These will be secured through Requirements in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].**
Flood Risk		
Paragraph 5.8.7	Where new energy infrastructure is, exceptionally, necessary in flood risk areas (for example where there are no reasonably available sites in areas at lower risk), policy aims to make it safe for its lifetime without increasing flood risk elsewhere and, where possible, by reducing flood risk overall. It should also be designed and constructed to remain operational in times of flood.	**ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** has been informed by **ES Volume 3, Appendix 11-1: FRA and Drainage Strategy [EN010168/APP/6.3]** and assesses the likely impacts and effects of the Scheme in relation to hydrology, flood risk and drainage for the whole lifecycle of the Scheme. All impacts on the water environment are also assessed within **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1].** **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1** concludes that, with the embedded mitigation, including sequentially located associated electrical infrastructure, and incorporation of SuDS, and the measures described in the **Outline CEMP [EN010168/APP/7.12]** and **Outline Decommissioning Strategy [EN010168/APP/7.14]**, no significant residual effects are anticipated. These

Relevant Paragraph	Detail	Scheme Compliance
		will be secured through Requirements in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].** The Sequential and Exception Tests have been applied and are considered to be met, as set out in **Annex C: Sequential and Exception Test** to the **Planning Statement [EN010168/APP/7.2].** This sets out the sequential approach taken to site selection, preferring sites in areas of lower flood risk before considering sites in Flood Zones 2 and 3 because there are no reasonably available sites in areas at lower risk. On the basis that some areas of Flood Zones 2 and 3 are present within the Solar PV Sites, the Exception Test has been applied and Annex C sets out the wider sustainability benefits of the Scheme and how the Scheme is safe for its lifetime, without increasing flood risk elsewhere and reducing flood risk overall.
Paragraph 5.8.9	If, following application of the Sequential Test, it is not possible, (taking into account wider sustainable development objectives), for the project to be located in areas of lower flood risk the Exception Test can be applied as defined in https://www.gov.uk/guidance/flood-risk-and-coastal-change#table2. The test provides a method of allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available.	**Annex C: Sequential and Exception Test** to the **Planning Statement [EN010168/APP/7.2]** demonstrates how the Scheme has applied the Sequential Test and Exception Tests. The Sequential Test has been applied and satisfied as part of site selection. This is described in **Annex C: Sequential and Exception Test** to the **Planning Statement [EN010168/APP/7.2]** and demonstrates that priority has been given to areas of lower flood risk in the site selection assessment, with areas in Flood Zones 2 and 3 initially excluded from the search for alternative sites. None of the alternative sites at lower

Relevant Paragraph	Detail	Scheme Compliance
		risk of flooding were assessed to be suitable for the Scheme and therefore further areas were explored within Flood Zones 2 and 3. The Scheme has been designed so that areas of more vulnerable infrastructure have been sited in areas of lower flood risk. **Annex C: Sequential and Exception Test** to the **Planning Statement [EN010168/APP/7.2]** concludes that the Scheme would not result in any increase in flood risk from all sources, to and from the Scheme. As it has not been possible to locate the Scheme fully in areas at a lower risk of flooding, the Exception Test has been applied.
Paragraph 5.8.10	The Exception Test is only appropriate for use where the Sequential Test alone cannot deliver an acceptable site. It would only be appropriate to move onto the Exception Test when the Sequential Test has identified reasonably available, lower risk sites appropriate for the proposed 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.	**Annex C: Sequential and Exception Test** to the **Planning Statement [EN010168/APP/7.2]** describes how the Applicant has initially considered siting the Scheme on reasonably available land within Flood Zone 1, in line with the Sequential Test. However, in the absence of suitable land parcels within Flood Zone 1, it has considered areas within Flood Zones 2 and 3 and assessed each of them for potential risks of flooding. The Scheme is assessed as the best option overall, taking account of the risk of flooding (which, for the Scheme, is negligible to low) and other relevant constraints. The Applicant has also considered the Sequential Test at a site level, with incorporation of design features to locate more vulnerable elements of the Scheme within areas of lower flood risk, and to generally safeguard the Solar PV Sites from flooding

Relevant Paragraph	Detail	Scheme Compliance
		both to and from site. Finally, the Applicant has applied the Exception Test and Annex C sets out the substantial wider sustainability benefits of the Scheme, together with the proposed measures that have been incorporated into the Scheme design to ensure that the Scheme is safe from flooding for its lifetime and will not increase the risk of flooding elsewhere.
Paragraph 5.8.11	Both elements of the Exception Test will have to be satisfied for development to be consented. To pass the Exception Test it should be demonstrated that: • the project would provide wider sustainability benefits to the community that outweigh flood risk; and • the project will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible will reduce flood risk overall.	**Annex C: Sequential and Exception Test** to the **Planning Statement [EN010168/APP/7.2]** sets out the wider sustainability benefits of the Scheme and how the design of the Scheme ensures it is safe for its lifetime, will not increase flood risk elsewhere, and will reduce flood risk overall.
Paragraph 5.8.12	Development should be designed to ensure there is no increase in flood risk elsewhere, accounting for the predicted impacts of climate change throughout the lifetime of the development. There should be no net loss of floodplain storage and any deflection or constriction of flood flow routes should be safely managed within the site. Mitigation measures should make as much use as possible of natural flood management techniques.	The Flood Risk Assessment (FRA) and Drainage Strategy is included at **ES Volume 3, Appendices 11-1 to 11-9 [EN010168/APP/6.3]**. It concludes that flood risk from all sources to the Scheme is negligible to low and embedded mitigation has been incorporated into the Scheme design to increase its flood resilience, such as siting critical infrastructure in Flood Zone 1, where there is less risk of flooding, and incorporating a minimum 8 m buffer between infrastructure and all Main Rivers and Ordinary Watercourses. Full details of the embedded mitigation, including permeable SuDS features such as gravel-filled trenches or French drains, are contained within **ES Volume 3,**

Relevant Paragraph	Detail	Scheme Compliance
		Appendices 11-1 to 11-9 [EN010168/APP/6.3]. Further, the Scheme is not anticipated to increase the risk of flooding elsewhere.
Paragraph 5.8.13	A site-specific flood risk assessment should be provided for all energy projects in Flood Zones 2 and 3 in England or Zones B and C in Wales. In Flood Zone 1 in England or Zone A in Wales, an assessment should accompany all proposals involving: • 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.	**ES Volume 3, Appendices 11-1 – 11-9: FRA and Drainage Strategy [EN010168/APP/6.3]** provide site specific flood risk assessments which include consideration of each Solar PV Sites and Cable Route Corridor's hydrology, assesses the potential risks of flooding to each Solar PV Site and its surroundings. The appendices provide an assessment of flood risk to and from the Scheme from all sources of flooding taking account of climate change. It also outlines measures to manage surface water, prevent increased flood risk, and ensure proper drainage through sustainable systems, including SuDS.
Paragraph 5.8.14	This assessment should identify and assess the risks of all forms of flooding to and from the project and demonstrate how these flood risks will be managed, taking climate change into account.	**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 the hydrology of each Solar PV Site and the Cable Route Corridor and assesses the potential risks of flooding to each Solar PV Site and its surroundings. **ES Volume 3, Appendices 11-1 to 11-9: FRA and Drainage Strategy [EN010168/APP/6.3]** provide an assessment of flood risk to and from the

Relevant Paragraph	Detail	Scheme Compliance
		Scheme from all sources of flooding taking account of climate change.
Paragraph 5.8.15	The minimum requirements for Flood Risk Assessments (FRA) are that they should: • be proportionate to the risk and appropriate to the scale, nature and location of the project; • consider the risk of flooding arising from the project in addition to the risk of flooding to the project; • take the impacts of climate change into account, across a range of climate scenarios, clearly stating the development lifetime over which the assessment has been made; • be undertaken by competent people, as early as possible in the process of preparing the proposal; • consider both the potential adverse and beneficial effects of flood risk management infrastructure, including raised defences, flow channels, flood storage areas and other artificial features, together with the consequences of their failure and exceedance; • 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	**ES Volume 3, Appendices 11-1 to 11-9: FRA and Drainage Strategy [EN010168/APP/6.3]** provides site specific assessments of flood risk to and from the Scheme from all sources of flooding, taking climate change into account. **ES Volume 3, Appendices 11-1 to 11-9: FRA and Drainage Strategy [EN010168/APP/6.3]** demonstrates how residual flood risk will be managed during construction, operation and decommissioning of the Scheme. **ES Volume 3, Appendices 11-1 to 11-9: FRA and Drainage Strategy [EN010168/APP/6.3]** meets all the requirements set out within this policy.

Relevant Paragraph	Detail	Scheme Compliance
	likelihood, speed-of-onset, depth, velocity, hazard and duration; • identify and secure opportunities to reduce the causes and impacts of flooding overall, making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management; • consider the effects of a range of flooding events including extreme events on people, property, the natural and historic environment and river and coastal processes; • include the assessment of the remaining (known as 'residual') risk after risk reduction measures have been taken into account and demonstrate that these risks can be safely managed, ensuring people will not be exposed to hazardous flooding; • consider how the ability of water to soak into the ground may change with development, along with how the proposed layout of the project may affect drainage systems. Information should include: i. Describe the existing surface water drainage arrangements for the site ii. Set out (approximately) the existing rates and volumes of surface water run-off generated by the site. Detail the proposals for restricting discharge rates iii. Set out proposals for managing and discharging surface water from the site using sustainable drainage systems and	

Relevant Paragraph	Detail	Scheme Compliance
	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 • 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;	

Relevant Paragraph	Detail	Scheme Compliance
	• 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.	
Paragraph 5.8.17	Development (including construction works) will need to account for any existing watercourses and flood and coastal erosion risk management structures or features, or any land likely to be needed for future structures or features so as to ensure: • Access, clearances and sufficient land are retained to enable their maintenance, repair, operation, and replacement, as necessary • Their standard of protection is not reduced • Their condition or structural integrity is not reduced	**ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** presents the assessment of the likely significant effects on surface water bodies (e.g. rivers, streams, ditches, canals, lakes and ponds) including water quality and hydromorphology, flood risk and drainage. It concludes that, with the embedded mitigation and additional mitigation outlined in Chapter 11, and the measures described in the **Outline CEMP [EN010168/APP/7.12]** and **Outline Decommissioning Strategy [EN010168/APP/7.14],** no significant residual effects are anticipated during the construction, operation and maintenance and decommissioning phases of the Scheme. Additional mitigation includes measures to prevent pollution run-off into watercourses in the case of a battery fire, as set out in the **Outline BSMP [EN010168/APP/7.21],** and Horizontal Directional Drilling within the cable route corridor to protect watercourses at crossing points. These measures will be secured through Requirements in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].** **ES Volume 3, Appendices 11-1 to 11-9: FRA and Drainage Strategy [EN010168/APP/6.3]** has been

Relevant Paragraph	Detail	Scheme Compliance
		prepared detailing appropriate surface water drainage management through SuDS proposed as part of the Scheme to avoid increased flood risk from surface water and management of flow paths to ensure the Scheme remains safe throughout its lifetime. A detailed Drainage Strategy is secured through Requirement 11 in Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**.
Paragraph 5.8.18	Applicants for projects which may be affected by, or may add to, flood risk should arrange pre-application discussions before the official pre-application stage of the NSIP process with the EA or NRW, and, where relevant, other bodies such as Lead Local Flood Authorities, Internal Drainage Boards, sewerage undertakers, navigation authorities, highways authorities and reservoir owners and operators.	The preparation of the FRAs at **ES Volume 3, Appendices 11-1 to 11-9: FRA and Drainage Strategy [EN010168/APP/6.3]**, and **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** have considered advice and taken account of consultation with key bodies, including the Environment Agency (EA), the Lead Local Flood Authorities (LLFAs) and the Internal Drainage Boards (IDBs). Full details of the consultation undertaken are included in the **Consultation Report [EN010168/APP/5.1].**
Paragraph 5.8.19	Such discussions should identify the likelihood and possible extent and nature of the flood risk, help scope the FRA, and identify the information that will be required by the Secretary of State to reach a decision on the application when it is submitted. The Secretary of State should advise applicants to undertake these steps where they appear necessary but have not yet been addressed.	The preparation of the FRAs at **ES Volume 3, Appendices 11-1 to 11-9: FRA and Drainage Strategy [EN010168/APP/6.3]**, and **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** has considered advice and taken account of consultation with key bodies, including the Environment Agency (EA), the Lead Local Flood Authorities (LLFAs) and the Internal Drainage Boards (IDBs). Full details of the consultation undertaken are included in the **Consultation Report [EN010168/APP/5.1].**

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 5.8.20	If the EA, NRW or another flood risk management authority has reasonable concerns about the proposal on flood risk grounds, the applicant should discuss these concerns with the EA or NRW and take all reasonable steps to agree ways in which the proposal might be amended, or additional information provided, which would satisfy the authority's concerns.	The preparation of the FRAs at **ES Volume 3, Appendices 11-1 to 11-9: FRA and Drainage Strategy [EN010168/APP/6.3]**, and **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** has considered advice and taken account of consultation with key bodies, including the Environment Agency (EA), the Lead Local Flood Authorities (LLFAs) and the Internal Drainage Boards (IDBs). Full details of the consultation undertaken are included in the **Consultation Report [EN010168/APP/5.1].**
Paragraph 5.8.21	The Sequential Test ensures that a sequential, risk-based approach is followed to steer new development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account. Where it is not possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites with medium risk areas and then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas.	**Annex C: Sequential and Exception Test** to the **Planning Statement [EN010168/APP/7.2]** describes how the Applicant has initially considered siting the Scheme on reasonably available land within Flood Zone 1, in line with the Sequential Test. However, in the absence of suitable land parcels within Flood Zone 1, it has considered areas within Flood Zones 2 and 3 and assessed each of them for potential risks of flooding. The Scheme is assessed as the best option overall, taking account of the risk of flooding (which, for the Scheme, is negligible to low) and other relevant constraints. The Applicant has also considered the Sequential Test at a site level, with incorporation of design features to locate more vulnerable elements of the Scheme within areas of lower flood risk, and to generally safeguard the Solar PV Sites from flooding both to and from site. Finally, the Applicant has applied the Exception Test and Annex C sets out the substantial wider sustainability benefits of the Scheme, together with the proposed measures that have been

Relevant Paragraph	Detail	Scheme Compliance
		incorporated into the Scheme design to ensure that the Scheme is safe from flooding for its lifetime and will not increase the risk of flooding elsewhere.
Paragraph 5.8.23	Consideration of alternative sites should take account of the policy on alternatives set out in Section 4.3 above. All projects should apply the Sequential Test to locating development within the site.	The Applicant's consideration of alternative sites in **Annex C: Sequential and Exception Test** of the **Planning Statement [EN010168/APP/7.2]** adopts the same criteria based methodology as applied to site selection in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3]** in the wider consideration of alternative sites**.** The Sequential Test considers flood risk together with other environmental and planning constraints when assessing the suitability of reasonably available alternative sites.
Paragraph 5.8.24	To satisfactorily manage flood risk, arrangements are required to manage surface water and the impact of the natural water cycle on people and property.	**ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** presents the assessment of the likely significant effects on surface water bodies (e.g. rivers, streams, ditches, canals, lakes and ponds) including water quality and hydromorphology, flood risk and drainage. The chapter concludes that the Scheme will remain safe throughout its lifetime and will not increase the risk of flooding from surface water elsewhere and will be resilient to flooding with the implementation of mitigation measures secured via requirements. Mitigation measures are set out in the **Outline CEMP [EN010168/APP/7.12]** and **Outline Decommissioning Strategy [EN010168/APP/7.14]** and **Outline BSMP [EN010168/APP/7.21]**. These

Relevant Paragraph	Detail	Scheme Compliance
		measures will be secured through Requirements in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].** **ES Volume 3, Appendices 11-1 to 11-9: FRA and Drainage Strategy [EN010168/APP/6.3]** includes embedded mitigation measures informing a detailed strategy to be secured by a requirement in the **Draft DCO [EN010168/APP/3.1]** in order to ensure that the Scheme manages flood risk through its surface water strategy during its lifetime to ensure that surface water flood risk does not increase elsewhere.
Paragraph 5.8.25	In this NPS, the term SuDS refers to the whole range of sustainable approaches to surface water drainage management including, where appropriate: • source control measures including rainwater recycling and drainage • infiltration devices to allow water to soak into the ground, that can include individual soakaways and communal facilities • filter strips and swales, which are vegetated features that hold and drain water downhill mimicking natural drainage patterns • filter drains and porous pavements to allow rainwater and run-off to infiltrate into permeable material below ground and provide storage if needed • basins, ponds and tanks to hold excess water after rain and allow controlled discharge that avoids flooding	The proposed surface water drainage design is set out in **ES Volume 3, Appendices 11-1 to 11-9: FRA and Drainage Strategy [EN010168/APP/6].** As set out in Section 3.7 of the **Design Approach Document [EN010168/APP/7.3]** Design Principle 6, seeks to protect the water environment by adhering to good pollution control practice and be resilient from flooding both now and in the future and not increase the risk of flooding elsewhere. Section 3.2 of **ES Volume 3, Appendix 11-1: FRA and Drainage Strategy [EN010168/APP/6]** sets out the measures to be implemented with regard to drainage and surface water management. These include, but are not limited to, buffers around watercourses; linear infiltration trenches; and directing runoff from equipment and access tracks to permeable SuDS or passive drainage features. Mitigation measures for the management of effects with regard to flood risk and

Relevant Paragraph	Detail	Scheme Compliance
	• flood routes to carry and direct excess water through developments to minimise the impact of severe rainfall flooding	drainage will be managed through the **Outline CEMP [EN010168/APP/7.12]** and **Outline OEMP [EN010168/APP/7.13]**. Detailed versions of these plans will be secured via requirements 13 and 14 under Schedule 2 of the **Draft DCO [EN010168/APP/3.1].** **ES Volume 1, Chapter 11: Hydrology, Flood Risk, and Drainage [EN010168/APP/6.1]** concludes with the embedded mitigation measures set out in Section 11.9, no residual significant effects are anticipated. This includes consideration of flood risk and drainage as set out in
Paragraph 5.8.26	Site layout and surface water drainage systems should cope with events that exceed the design capacity of the system, so that excess water can be safely stored on or conveyed from the site without adverse impacts.	**ES Volume 3, Appendices 11-1 to 11-9: FRA and Drainage Strategy [EN010168/APP/6.3]** along with supporting assessments and hydraulic modelling confirm that the construction, operation and decommissioning of the Scheme, with mitigation and best practice control measures, will remain safe for its lifetime and will not increase flood risk elsewhere, taking into account climate change. **ES Volume 1, Chapter 11: Hydrology, Flood Risk, and Drainage [EN010168/APP/6.1]** concludes with the embedded mitigation measures set out in Section 11.9, no residual significant effects are anticipated. Section 6.5 of **ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy**

Relevant Paragraph	Detail	Scheme Compliance
		[EN010168/APP/6.3] sets out any surface water runoff in excess of the infiltration capacity of the ground may naturally drain into the surrounding land drainage ditches / watercourses as per the existing scenario.
Paragraph 5.8.27	The surface water drainage arrangements for any project should, accounting for the predicted impacts of climate change throughout the development's lifetime, be such that the volumes and peak flow rates of surface water leaving the site are no greater than the rates prior to the proposed project, unless specific off-site arrangements are made and result in the same net effect.	**ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** presents an assessment of the likely significant effects on Hydrology, Flood Risk and Drainage as a result of the Scheme. This concludes that with the proposed mitigation measures, as set out in the **Outline CEMP [EN010168/APP/7.12]** and **Outline Decommissioning Strategy [EN010168/APP/7.14]**, that there will be no change to the risk of flooding from all sources and no significant effects. These measures will be secured through Requirements in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].** Given the design mitigation secured through the **Outline OEMP [EN010168/APP/7.13]**, there will be no significant adverse effects predicted upon receptors with regard to flood risk during operation of the Scheme. **ES Volume 3, Appendices 11-1 to 11-9: FRA and Drainage Strategy [EN010168/APP/6.3]**, sets out measures in relation to surface water drainage management through SuDS, which are proposed to avoid increased flood risk from surface water and management of flow paths to ensure the Scheme remains safe throughout its lifetime. A detailed Drainage Strategy is secured through Requirement 11 in Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**.

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Paragraph 5.8.28	It may be necessary to provide surface water storage and infiltration to limit and reduce both the peak rate of discharge from the site and the total volume discharged from the site. There may be circumstances where it is appropriate for infiltration facilities or attenuation storage to be provided outside the project site, if necessary through the use of a planning obligation.	**ES Volume 3, Appendices 11-1 to 11-9: FRA and Drainage Strategy [EN010168/APP/6.3]** has been prepared setting out how surface water will be managed across the Scheme to avoid an increase in flood risk elsewhere. Runoff will be attenuated via sustainable drainage techniques and restricted at greenfield rates to watercourses within the Order Limits as per the existing conditions. A detailed Drainage Strategy is secured through Requirement 11 in Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**. Mitigation measures relating to drainage are provided within the Order Limits and there are no mitigation measures to be implemented outside of the project site.
Paragraph 5.8.29	The sequential approach should be applied to the layout and design of the project. Vulnerable aspects of the development should be located on parts of the site at lower risk and residual risk of flooding. Applicants should seek opportunities to use open space for multiple purposes such as amenity, wildlife habitat and flood storage uses. Opportunities should be taken to lower flood risk by reducing the built footprint of previously developed sites and using SuDS.	As demonstrated in Section 4 of **Annex C: Sequential and Exception Test** to the **Planning Statement [EN010168/APP/7.2]**, the sequential test has been applied to the layout and design of the Scheme. • The areas of the Solar PV Sites within Flood Zones 2 and 3 have been used for the proposed location of solar PV panels and for biodiversity and enhancement areas, being elements of the Scheme that are less vulnerable to flooding. • The most vulnerable elements of infrastructure, being the BESS and substations, will be sited in areas of Flood Zone 1, at lower risk of flooding.; • Except where archaeological protection is required, the foundations of the Solar PV

Relevant Paragraph	Detail	Scheme Compliance
		Panels are likely to be metal posts driven into the ground at an approximate depth of 1.5m to 4m (dependant on ground conditions); • All sensitive and electrical equipment on the Solar PV Panels, will be elevated by the legs (including the facing of the Solar PV Panels) so that there is a minimum clearance of 0.4 m no less than 0.6 m above the 0.1% Annual Exceedance Probability (AEP) flood level or where this is not possible, as high as practicable. If tracker panels are selected for the Scheme, these may be stowed on a horizontal plane during flood events; • Integrated Conversion Units / 33 kV Sub-distribution Switch Rooms, standalone inverters, transformers and switchgear will be elevated by mounting structures so that they are no less than 0.6 m above the 0.1% Annual Exceedance Probability (AEP) flood level or where this is not possible as high as practicable.; and • A buffer of 8 metres has been applied around watercourses within which there will be no built development, in order to mitigate against the impacts of flood risk to the Scheme. **ES Volume 3, Appendices 11-1 to 11-9: FRA and Drainage Strategy [EN010168/APP/6.3]** and supporting assessments and hydraulic modelling has been prepared setting out how surface water will be managed across the Scheme to avoid an increase in

Relevant Paragraph	Detail	Scheme Compliance
		flood risk elsewhere. The Outline Drainage Strategy concludes that runoff will be attenuated via sustainable drainage techniques (excluding infiltration to ground due to assumed geological conditions) and restricted at greenfield rates to watercourses within the Order Limits as per the existing conditions. A detailed Surface Water Drainage Strategy will be secured by a requirement of the **Draft DCO [EN010168/APP/3.1]**.
Paragraph 5.8.30	Where a development may result in an increase in flood risk elsewhere through the loss of flood storage, on-site level-for-level compensatory storage, accounting for the predicted impacts of climate change over the lifetime of the development, should be provided.	**ES Volume 3, Appendices 11-1 to 11-9: FRA and Drainage Strategy [EN010168/APP/6.3]** and supporting assessments and hydraulic modelling confirm that the construction, operation and decommissioning of the Scheme, with mitigation and best practice control measures, will remain safe for its lifetime and will not increase flood risk elsewhere, taking into account climate change.
Paragraph 5.8.31	Where it is not possible to provide compensatory storage on site, it may be acceptable to provide it off-site if it is hydraulically and hydrologically linked. Where development may cause the deflection or constriction of flood flow routes, these will need to be safely managed within the site.	With the embedded and additional mitigation measures described above and those within the **Outline CEMP [EN010168/APP/7.12]**, secured through Requirement 13 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1],** all identified likely significant effects have been assessed as being of negligible significance, and are therefore not significant in EIA terms. **ES Volume 3, Appendices 11-1 to 11-9: FRA and Drainage Strategy [EN010168/APP/6.3]** and supporting assessments and hydraulic modelling has been prepared setting out how surface water will be managed across the Scheme to avoid an increase in

Relevant Paragraph	Detail	Scheme Compliance
		flood risk elsewhere. The Outline Drainage Strategy concludes that runoff will be attenuated via sustainable drainage techniques (excluding infiltration to ground due to assumed geological conditions) and restricted at greenfield rates to watercourses within the Order limits as per the existing conditions.
Paragraph 5.8.32	Where development may contribute to a cumulative increase in flood risk elsewhere, the provision of multifunctional sustainable drainage systems, natural flood management and green infrastructure can also make a valuable contribution to mitigating this risk whilst providing wider benefits.	**ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** sets out that there is the potential for cumulative effects during construction. However, with the embedded mitigation measures in place, (including: permeable SuDS features such as gravel-filled trenches or French drains, or similar passive drainage features appropriate to local condition), and considering there are no significant effects identified for the individual solar PV sites and Cable Route Corridor elements, it is considered that there are no cumulative overall effects on water environment receptors.
Paragraph 5.8.33	The receipt of and response to warnings of floods is an essential element in the management of the residual risk of flooding. Flood Warning and evacuation plans should be in place for those areas at an identified risk of flooding.	**ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** sets out that the Contractor will be required to produce an Emergency Response Plan prior to construction, should DCO consent be granted. The Emergency Response Plan will be secured via a requirement in the DCO requiring a full drainage strategy to be approved by the relevant planning authority in accordance with the **Outline CEMP [EN010168/APP/7.12]** secured through Requirement 13 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].**

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 5.8.34	The applicant should take advice from the local authority emergency planning team, emergency services and, where appropriate, from the local resilience forum when producing an evacuation plan for a manned energy project as part of the FRA. Any emergency planning documents, flood warning and evacuation procedures that are required should be identified in the FRA.	**ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** sets out that the Contractor will be required to produce an Emergency Response Plan prior to construction, should DCO consent be granted. The Emergency Response Plan will be secured via a requirement in the DCO requiring a full drainage strategy to be approved by the relevant planning authority in accordance with the **Outline CEMP [EN010168/APP/7.12]** secured through Requirement 13 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].**
Paragraph 5.8.35	Flood resistant and resilient materials and design should be adopted to minimise damage and speed recovery in the event of a flood.	As set out in **ES Volume 3, Appendices 11-1 to 11-9: FRA and Drainage Strategy [EN010168/APP/6.3]**, the Scheme has been designed to safeguard the water environment through being resilient to flooding now and in the future. For example, the panel structures are flood resilient and not considered vulnerable to short-term water contact and all service cabling should be designed and installed to be flood resilient / water compatible.
Paragraph 5.8.36	In determining an application for development consent, the Secretary of State should be satisfied that where relevant: • the application is supported by an appropriate FRA the Sequential Test has been applied and satisfied as part of site selection • a sequential approach has been applied at the site level to minimise risk by directing the most vulnerable uses to areas of lowest flood risk	As demonstrated in **Annex C: Sequential and Exception Test** to the **Planning Statement [EN010168/APP/7.2]**, a sequential approach has been applied in selecting the land for the Scheme and to the subsequent layout and design of the solar infrastructure within the Solar PV Sites. The Exception Test has been applied and **Annex C: Sequential and Exception Test** to the **Planning Statement [EN010168/APP/7.2]** sets out the wider sustainability benefits that the Scheme will deliver and that the

Relevant Paragraph	Detail	Scheme Compliance
	• the proposal is in line with any relevant national and local flood risk management Strategy • SuDS (as required in the next paragraph on National Standards) have been used unless there is clear evidence that their use would be inappropriate • in flood risk areas the project is designed and constructed to remain safe and operational during its lifetime, without increasing flood risk elsewhere (subject to the exceptions set out in paragraph 5.8.42) • the project includes safe access and escape routes where required, as part of an agreed emergency plan, and that any residual risk can be safely managed over the lifetime of the development • land that is likely to be needed for present or future flood risk management infrastructure has been appropriately safeguarded from development to the extent that development would not prevent or hinder its construction, operation or maintenance	Scheme will remain safe throughout its lifetime without increasing flood risk elsewhere. **ES Volume 3, Appendices 11-1 to 11-9: FRA and Drainage Strategy [EN010168/APP/6** and supporting assessments and hydraulic modelling confirm that the construction, operation and decommissioning of the Scheme, with mitigation and best practice control measures, will remain safe for its lifetime and will not increase flood risk elsewhere, taking into account climate change. SuDS are proposed to be used for impermeable infrastructure such as substations and the BESS including SuDS features, attenuation, and flow control devices designed to limit runoff to greenfield rates. Design mitigation measures set out in the **Outline OEMP [EN010168/APP/7.13]** are secured through the **Draft DCO [EN010168/APP/3.1]** and seek to prevent an increase in flood risk to vulnerable receptors from the Scheme and mitigate flood risk to the Scheme. **.** An Emergency Response Plan will be included as part of the detailed CEMP, OEMP and Decommissioning Strategy which will provide details of the response to an impending flood defence breach scenario including an evacuation plan.
Paragraph 5.8.38	In addition, the Development Consent Order, or any associated planning obligations, will need to make provision for appropriate operation and maintenance of any SuDS throughout the project's lifetime. Where this	The provision for appropriate operation and maintenance of any SuDS through the projects lifetime will be controlled through the implementation of the detailed CEMP, OEMP and Decommissioning

Relevant Paragraph	Detail	Scheme Compliance
	is secured through the adoption of any SuDS features, any necessary access rights to property will need to be granted.	Strategy. These will be substantially in accordance with the **Outline CEMP [EN010168/APP/7.12], Outline OEMP [EN010168/APP7.13]** and the **Outline Decommissioning Strategy [EN010168/APP/7.14]** and secured through Requirements in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].**
Paragraph 5.8.42	Exceptionally, where an increase in flood risk elsewhere cannot be avoided or wholly mitigated, the Secretary of State may grant consent if they are satisfied that the increase in present and future flood risk can be mitigated to an acceptable and safe level and taking account of the benefits of, including the need for, nationally significant energy infrastructure as set out in Part 3 above. In any such case the Secretary of State should make clear how, in reaching their decision, they have weighed up the increased flood risk against the benefits of the project, taking account of the nature and degree of the risk, the future impacts on climate change, and advice provided by the EA or NRW and other relevant bodies.	The Scheme would not result in an increase in flood risk elsewhere as set out in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** where appropriate mitigation measures have been proposed to ensure the Scheme is safe for its lifetime.
Historic Environment		
Paragraph 5.9.7	The Secretary of State should also consider the impacts on other non-designated heritage assets (as identified either through the development plan making process by plan-making bodies, including 'local listing', or through the application, examination and decision making process). This is on the basis of clear evidence that such heritage assets have a significance that merits consideration in that process, even though those assets	An assessment of likely significant effects on the historic environment from the Scheme is provided in Section 12.10 of **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]**. The impact on each asset, and the relevant embedded and additional mitigation measures are set out in full within **ES Volume 3, Appendix 12-8: Cultural Heritage Impact Assessment Tables [EN010168/APP/6.3]**.

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	are of lesser significance than designated heritage assets.	Archaeological field evaluation was undertaken within all areas of the Scheme that were suitable for survey and where land access was permitted to enhance baseline understanding of non-designated heritage assets. The results are detailed in **ES Volume 3, Appendix 12-4: Archaeological Geophysical Survey Reports [EN010168/APP/6.3]**. Evaluation trial trenching was undertaken to test the results of the geophysical survey. Interim reports detailing the results of the evaluation trial trenching are provided in **ES Volume 3, Appendix 12- 5: Interim Evaluation Trial Trenching Reports [EN010168/APP/6.3]**. **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** concludes no significant effects are anticipated on non-designated heritage assets as a result of the construction, operation and maintenance and decommissioning of the Scheme. In the absence of additional mitigation, significant effects have been identified for 17 archaeological assets. Following implementation of additional mitigation measures including the implementation of an overarching Archaeological Mitigation Strategy (AMS), the residual effect would be reduced and no significant effects would occur. Where archaeological mitigation in the form of a programme of excavation and recording will occur or re-instatement of earthworks, it should be noted that physical impact will still occur to archaeological assets identified. However, the archaeological mitigation works proposed are

Relevant Paragraph	Detail	Scheme Compliance
		considered sufficient to preserve the assets by record, and as such compensate for their loss.
Paragraph 5.9.9	The applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA, and describe these along with how the mitigation hierarchy has been applied in the ES (see Section 4.3). 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.	Section 12.10 of **ES Volume 1, Chapter 12: Cultural [EN010168/APP/6.1]** provides a detailed assessment of the likely impacts and effects of the Scheme on cultural heritage. The impact on each asset, and the relevant embedded and additional mitigation measures are set out in full within **ES Volume 3, Appendix 12-8: Cultural Heritage Impact Assessment Tables [EN010168/APP/6.3]**. The assessment concludes that, with embedded and additional mitigation there will be no significant impacts to any designated or non-designated heritage assets including listed buildings, archaeological assets and historic landscape character as a result of the Scheme. Section 12.13 of **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** sets out the cumulative effects assessment of the Scheme in relation to cultural heritage. No significant effects and no cumulative impacts have been identified as a result of the Scheme and other identified projects. **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** considers the historic landscape character. **ES Volume 3, Appendix 12-7: Historic Landscape Assessment [EN0101068/APP/6.3]** identifies the majority of the land within the Order Limits of the Scheme forms enclosed land characterised by post-medieval and modern land uses.

Relevant Paragraph	Detail	Scheme Compliance
		Impacts are likely to be minimal, temporary and reversible. Elements that characterise the historic landscape within the Order Limits will be retained, and any temporary change in land use will be reversed following decommissioning. Consequently, it is considered that the Scheme will not alter the ability to understand or experience the historic landscape character of the land within the Order Limits and the legibility of the historic landscape will be maintained. Therefore, **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** concludes that following the implementation of embedded and additional mitigation measures no significant impacts will occur on the historic landscape character during construction or operation of the Scheme.
Paragraph 5.9.11	Where a site on which development is proposed includes, or the available evidence suggests it has the potential to include, heritage assets with an archaeological interest, the applicant should carry out appropriate desk-based assessment and, where such desk-based research is insufficient to properly assess the interest, a field evaluation. Where proposed development will affect the setting of a heritage asset, accurate representative visualisations may be necessary to explain the impact.	The Scheme includes heritage assets with an archaeological interest. Baseline information has been collated from archaeological Desk-Based Assessments (DBA) (**ES Volume 3, Appendix 12-2: Archaeological Desk-Based Assessments [EN010168/APP/6.3]**) including a geoarchaeological DBA, as well as the results of archaeological evaluation (**ES Volume 3, Appendix 12-3: Air Photo and LiDAR Mapping and Interpretation [EN010168/APP/6.3], ES Volume 3, Appendix 12- 4: Archaeological Geophysical Survey Reports [EN010168/APP/6.3]** and **ES Volume 3, Appendix 12- 5: Interim Evaluation Trial Trenching Reports [EN010168/APP/6.3]**).

Relevant Paragraph	Detail	Scheme Compliance
		ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1] concludes that following the implementation of embedded and additional mitigation measures outlined within the Chapter in Sections 12.9 and 12.11, such as the implementation of an overarching Archaeological Mitigation Strategy, the residual effect on archaeological assets will not be significant.
Paragraph 5.9.12	The applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents. Studies will be required on those heritage assets affected by noise, vibration, light and indirect impacts, the extent and detail of these studies will be proportionate to the significance of the heritage asset affected.	**ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** provides an assessment of the Scheme on cultural heritage. Section 12.10 of **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** provides an assessment of the impact of the Scheme on the significance of designated and non-designated heritage assets. The ES considers the potential impacts of noise and vibration on heritage assets and concludes that following the implementation of embedded and additional mitigation, no significant impacts are anticipated on cultural heritage assets as a result of the Scheme. The impact of light on heritage assets is not covered in the assessment in **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** as it is not relevant to the Scheme. **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** considers indirect impacts, with short-term indirect impacts during construction likely

Relevant Paragraph	Detail	Scheme Compliance
		being very ephemeral in nature (for example limited glimpses of construction in a discrete part of the Order Limits), therefore indirect impacts that might occur during the construction phase would be reversible following the completion of the construction phase and therefore not significant. As the indirect impacts would be at their greatest in terms of magnitude and duration during the operational phase, this is the main focus of the assessment of impacts to designated and non-designated heritage assets detailed in **ES Volume 3, Appendix 12-1: Heritage Statement [EN010168/APP/6.3]**. The Heritage Statement concludes that the Scheme would lead to less than substantial harm at the lower end of the scale to seven designated heritage assets and five non-designated heritage assets, which is not significant in EIA terms.
Paragraph 5.9.13	The applicant is encouraged, where opportunities exist, to prepare proposals which can make a positive contribution to the historic environment, and to consider how their scheme takes account of the significance of heritage assets affected. This can include, where possible: • enhancing, through a range of measures such a sensitive design, the significance of heritage assets or setting affected • considering where required the development of archive capacity which could deliver significant public benefits	The Scheme has been designed, as far as practicable, to avoid and reduce impacts and effects on cultural heritage. The impact on each asset, and the relevant embedded and additional mitigation measures are set out in **ES Volume 3, Appendix 12-8: Cultural Heritage Impact Assessment Tables [EN010168/APP/6.3].** Mitigation that has been embedded into the Scheme by design includes the avoidance of archaeologically sensitive areas and areas considered to cause an

Relevant Paragraph	Detail	Scheme Compliance
	• considering how visual or noise impacts can affect heritage assets, and whether there may be opportunities to enhance access to, or interpretation, understanding and appreciation of, the heritage assets affected by the scheme	indirect impact to the significance of heritage assets through their setting. Mitigation measures have included the removal of previously proposed Solar PV Panels entirely from various fields within the Solar PV Sites and the inclusion of offsets as a result of heritage or archaeological sensitivities. The **Design Approach Document [EN010168/APP/7.3]** sets out how the Scheme has sought to mitigate adverse impacts, including on heritage assets. The assessment of likely impacts and effects in **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** has considered the visual and noise impacts of the Scheme on heritage assets. In locations with heritage assets that could be impacted by the Scheme through their settings, enhanced visual screening through vegetation and distance offsets are proposed including: • Offsets of a minimum 15 m have been applied to public rights of ways (PRoW) and existing hedgerows across the Scheme. • Landscape mitigation to mitigate potential adverse effects upon heritage assets will include planting of shelter belts and scattered trees, planting of new hedgerows, and existing hedgerow reinforcement. • Where practicable, any hedgerow removal required as part of the construction phase (i.e.

Relevant Paragraph	Detail	Scheme Compliance
		as part of the Cable Route Corridor) will be kept to a minimum and be reinstated
Paragraph 5.9.14	Careful consideration in preparing the scheme will be required on whether the impacts on the historic environment will be direct or indirect, temporary, or permanent.	**ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** assesses the likely direct, indirect, permanent and temporary impacts of the Scheme on cultural heritage. During construction, there is the potential for permanent direct impacts to archaeological remains, however following the implementation of additional mitigation measures as outlined in **ES Volume 3, Appendix 12-8: Cultural Heritage Impact Assessment Tables [EN010168/APP/6.3]**, no significant impacts are anticipated. These mitigation measures include the implementation of an overarching AMS which includes the location and nature of the additional mitigation in the form of strip, map and sample excavation, archaeological monitoring and re-instatement of earthworks. **ES Volume 3, Appendix 12-6 Outline Archaeological Mitigation Strategy [EN010168/APP/6.3]** details the overarching methodology for undertaking a programme of archaeological mitigation. **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** sets out that impacts of the Scheme on non-designated and designated assets during operation would predominantly be indirect (on setting). No significant impacts are anticipated as a result and impacts to setting would be temporary and

Relevant Paragraph	Detail	Scheme Compliance
		reversed following the decommissioning of the Scheme.
Paragraph 5.9.15	Applicants should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.	No World Heritage Sites are affected by the Scheme. **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** states there are no conservation areas within the Order Limits. Out of 28 conservation areas in the study area, six were identified where there is a potential for impacts and were scoped in for assessment. **ES Volume 3, Appendix 12-8: Cultural Heritage Impact Assessment Tables [EN010168/APP/6.3]** sets out that there is no significant adverse effects are anticipated to any conservation areas.
Paragraph 5.9.24	In considering the impact of a proposed development on any heritage assets, the Secretary of State should consider the particular nature of the significance of the heritage assets and the value that they hold for this and future generations. This understanding should be used to avoid or minimise conflict between their conservation and any aspect of the proposal.	Section 12.10 of **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** sets out the particular nature of the significance of heritage assets and the value they hold. An assessment of effects on these assets is also set out in Section 12.10.
Paragraph 5.9.27	When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset's conservation. The more important the asset, the greater the weight should be. This is irrespective of whether any potential harm amounts to substantial harm, total loss, or less than substantial harm to its significance.	**ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** concludes that following the implementation of embedded and additional mitigation measures there will be no residual significant effects on any designated or non-designated assets as a result of the Scheme. Embedded mitigation measures such as removal of solar PV from fields due to heritage sensitivities, have reduced any potential significant adverse effects.

Relevant Paragraph	Detail	Scheme Compliance
		ES Volume 3. Appendix 12-1: Heritage Statement [EN010168/APP/6.3] concludes that the Scheme would lead to less than substantial harm at the lower end of the scale to seven designated heritage assets and five non-designated heritage assets, which is not significant in EIA terms.
Paragraph 5.9.28	The Secretary of State should give considerable importance and weight to the desirability of preserving all heritage assets. Any harm or loss of significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification.	**ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** concludes that following the implementation of additional and embedded mitigation measures there will be no residual significant effects on any designated heritage assets as a result of the Scheme. Embedded mitigation measures, such as removal of solar PV from fields due to heritage sensitivities and creating offsets, have reduced any potential significant adverse effects. **ES Volume 3, Appendix 12-1: Heritage Statement [EN010168/APP/6.3]** concludes that the Scheme would lead to less than substantial harm at the lower end of the scale to seven designated heritage assets and five non-designated heritage assets, which is not significant in EIA terms. Paragraph 6.1.2 of **ES Volume 3, Appendix 12-1: Heritage Statement [EN010168/APP/6/.3]** sets out this relates to the following designated assets: • Bradfield Manor Farmhouse (Grade I); • Barn to the East of Surrendell Farmhouse (Grade II) • Fosse Lodge (Grade II);

Relevant Paragraph	Detail	Scheme Compliance
		• Surrendell Farmhouse (Grade II); • Widley's Farmhouse (Grade II); • Shelter Barn to the South East of Surrendell Farmhouse (Grade II); and • New Barn at Widley's Farmhouse (Grade II). The non-designated assets are: • Outfarm, East of Lords Wood Cottage • Lords Wood Cottage • Outfarm, East-northeast of Widley's Farm • Outfarm, North-northwest of Avil's Farm; and, • Townleaze Barn. Any impacts to the setting of designated heritage assets would be temporary and reversed following the decommissioning of the Scheme.
Paragraph 5.9.29	Substantial harm to or loss of significance of a grade II Listed Building or a grade II Registered Park or Garden should be exceptional.	**ES Volume 3, Appendix 12-1: Heritage Statement [EN010168/APP/6.3]** concludes that the Scheme will not lead to substantial harm to any designated heritage assets. There will be no substantial harm to or loss of significance of any grade II Listed Buildings or grade II Registered Park and Gardens as a result of the Scheme, in accordance with this policy.
Paragraph 5.9.30	Substantial harm to or loss of significance of assets of the highest significance, including Scheduled Monuments; Protected Wreck Sites; Registered Battlefields; grade I and II* Listed Buildings; grade I and	**ES Volume 3, Appendix 12-1: Heritage Statement [EN010168/APP/6.3]** concludes that the Scheme will not lead to substantial harm to any designated heritage assets.

Relevant Paragraph	Detail	Scheme Compliance
	II* Registered Parks and Gardens; and World Heritage Sites, should be wholly exceptional.	The Scheme will not lead to substantial harm to or loss of significant to any assets of the highest significance including Scheduled Monuments, Protected Wreck Sites, Registered Battlefields, grade I and II* Listed Buildings, grade I and II* Registered parks and Gardens, and World Heritage Sites.
Paragraph 5.9.31	Where the proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset the Secretary of State should refuse consent unless it can be demonstrated that the substantial harm to, or loss of, significance is necessary to achieve substantial public benefits that outweigh that harm or loss, or all the following apply: • the nature of the heritage asset prevents all reasonable uses of the site • no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation • conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible • the harm or loss is outweighed by the benefit of bringing the site back into use	**ES Volume 3, Appendix 12-1: Heritage Statement [EN010168/APP/6.3]** concludes that the Scheme will not lead to substantial harm to any designated heritage assets.
Paragraph 5.9.32	Where the proposed development will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate securing its optimum viable use.	**ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** concludes that following the implementation of embedded and additional mitigation measures there will be no residual significant effects on any designated or non-designated assets as a result of the Scheme. Embedded mitigation measures,

Relevant Paragraph	Detail	Scheme Compliance
		such as removal of solar PV from fields and creation of offsets, have reduced any potential significant adverse effects. **ES Volume 3, Appendix 12-1: Heritage Statement [EN010168/APP/6.3]** concludes that the Scheme would lead to less than substantial harm at the lower end of the scale to seven designated heritage assets and five non-designated heritage assets, which is not significant in EIA terms. The substantial benefits of the Scheme are set out in the **Planning Statement [EN010168/APP/7.2]** and include the contribution the Scheme makes to decarbonisation, the demand for electricity and security of supply, renewable energy generation, ecological and landscape enhancements, biodiversity net gain, the provision of 12.8km of permissive paths, employment generation, economic benefits and skills training. It is considered that these benefits outweigh the less than substantial harm to the heritage assets. In addition, NPS EN-1 establishes a CNP for the provision of nationally significant low carbon infrastructure, which includes large-scale solar farms. As set out in NPS EN-1 paragraph 4.2.16, CNP infrastructure should 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.

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 5.9.33	In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.	Section 12.10 of **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** provides an assessment of the impact of the Scheme on the significance of non-designated heritage assets. During construction, there is the potential for permanent direct impacts to archaeological remains, however following the implementation of mitigation measures, including an overarching AMS, which includes the location and nature of the additional mitigation in the form of strip, map and sample excavation, archaeological monitoring and re-instatement of earthworks. no significant impacts are anticipated. **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** concludes that following the implementation of additional and embedded mitigation measures there would be no significant impacts to any non-designated heritage assets following mitigation during construction, operation and maintenance and decommissioning of the Scheme. It is considered that the significant public benefits set out in Section 5 of the **Planning Statement [EN010168/APP/7.2]** and the compelling need for the Scheme set out in the **Statement of Need [EN010168/APP/7.1]** outweigh the effects of the Scheme on non-designated heritage assets.

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 5.9.34	Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 5.9.30 or less than substantial harm under paragraph 5.9.32, as appropriate, considering the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.	No World Heritage Sites are affected by the Scheme. **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** states there are no conservation areas within the Order limits of the Scheme. Out of 28 conservation areas in the study area, six were identified where there is a potential for impacts and were scoped in for assessment. **ES Volume 3, Appendix 12-8: Cultural Heritage Impact Assessment Tables [EN010168/APP/6.3]** sets out that no significant adverse effects are anticipated to any conservation areas.
Paragraph 5.9.36	When considering applications for development affecting the setting of a designated heritage asset, the Secretary of State should give appropriate weight to the desirability of preserving the setting such assets and treat favourably applications that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of, the asset. When considering applications that do not do this, the Secretary of State should give great weight to any negative effects, when weighing them against the wider benefits of the application. The greater the negative impact on the significance of the designated heritage asset, the greater the benefits that will be needed to justify approval.	**ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** concludes that following the implementation of embedded and additional mitigation measures there will be no residual significant effects on any designated or non-designated assets as a result of the Scheme. Embedded mitigation measures, such as removal of solar PV from fields due to heritage sensitivities, have reduced any potential significant adverse effects. **ES Volume 3, Appendix 12-1: Heritage Statement [EN010168/APP/6.3]** concludes that the Scheme would lead to less than substantial harm at the lower end of the scale to seven designated heritage assets and five non-designated heritage assets, which is not significant.

Relevant Paragraph	Detail	Scheme Compliance
		The substantial benefits of the Scheme are set out in the **Planning Statement [EN010168/APP/7.2]** and include the contribution the Scheme makes to decarbonisation, the demand for electricity and security of supply, renewable energy generation, ecological and landscape enhancements, biodiversity net gain, the provision of 12.8km of permissive paths, employment generation, economic benefits and skills training. It is considered that these benefits outweigh the less than substantial harm to the heritage assets. In addition, NPS EN-1 paragraph 4.2.16, CNP infrastructure should 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.
Landscape and Visual		
Paragraph 5.10.6	Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.	Good design has been a key consideration from the outset. As explained in the **Design Approach Document [EN010168/APP/7.3]** the landscape and visual impact assessment set out in **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]**, alongside other environmental assessment conclusions, national and local policy and feedback from consultation, has informed the iterative design process. As explained further in the **Design Approach Document [EN010168/APP/7.3]**, the design of the Scheme is 'Landscape Led' and due weight has been given to the intrinsic character and beauty of the

Relevant Paragraph	Detail	Scheme Compliance
		surrounding area. The landscape-led approach is reflected in the design principles which have provided a framework for design evolution in order to deliver positive design outcomes. The assessment in **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** considers the effects of the Scheme on landscape and visual receptors and provides appropriate mitigation. The **Design Principles and Parameters [EN010168/APP/7.4]** sets out the design principles and parameters by which the Scheme has been designed and the Environmental Impact Assessment has been undertaken. The design principles have informed the parameters, as set out in **Design Principles and Parameters [EN010168/APP/7.4]**. The parameters contained within the **Design Principles and Parameters [EN010168/APP/7.4]** are secured under Requirement 5 (detailed design approval) in the **Draft DCO [EN010168/APP/3.1]** and apply to the detailed design of the Scheme, post consent.
Paragraph 5.10.7	National Parks, the Broads and AONBs have been confirmed by the government as having the highest status of protection in relation to landscape and natural	The majority of the Scheme is located outside of the CNL. A very small section (2.16 ha) of the Scheme is located within the CNL and parts of Lime Down A, B

Relevant Paragraph	Detail	Scheme Compliance
	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.	and C are considered to be in the setting of the CNL. The works within the CNL comprise minor highway works to facilitate construction traffic. **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** sets out the alternative construction routes that were considered, and concludes that the proposed construction route through the CNL is considered to be the least constrained in terms of both meeting the needs of the Scheme and minimising environmental effects. As set out in the **Design Approach Document [EN010168/APP/7.3]** the Applicant has sought to reduce adverse impacts on the CNL by removing a number of fields from the Order Limits in areas near the CNL and also removing panels from fields in Lime Down A, B and C closest to the CNL. The Applicant has adopted a “landscape led” approach to design, giving due weight to the intrinsic character and beauty of the surrounding countryside (discussed in the **Design Approach Document [EN010168/APP/7.3]**). The proposed landscaping design is set out in ES **Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2]**.

Relevant Paragraph	Detail	Scheme Compliance
		ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswold National Landscape and its Special Qualities [EN010168/APP/6.3] provides a standalone assessment of the effects of the Scheme on the CNL and its Special Qualities. The landscape and visual effects of the Scheme on the CNL and its Special Qualities have been mitigated throughout the landscape led, iterative design process that has been undertaken which has been informed by the Cotswold Nature Recovery Plan and in consultation with officers at the CNL and Wiltshire Council. Embedded mitigation measures relating to the CNL include: • avoidance measures through the use of significant buffers for areas of the Scheme within the setting of the CNL and to maintain views. • protection of the existing landscape through buffers and offsets. • Retention and enhancement of the existing landscape framework including new planting and the re-establishment of historic hedgerows within the setting of the CNL, new areas of native woodland, trees, scrub and grassland, new planting within riparian corridors to enhance rivers and wetland, as well the restoration of dry-stone walls and creation of new ponds. • Positive enhancements to further the purpose of the CNL including, the creation of wildflower meadows, wildflower meadow verges and

Relevant Paragraph	Detail	Scheme Compliance
		maintaining hedgerows at their current height to maintain open view of the landscape. **ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswold National Landscape and its Special Qualities [EN010168/APP/6.3]** concludes that there are no significant direct effects on the CNL or its Special Qualities. It is considered that these measures are sufficient, appropriate and proportionate to the scale of the Scheme.
Paragraph 5.10.8	The duty to seek to further the purposes of nationally designated landscapes also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. In these locations, projects should be designed sensitively given the various siting, operational, and other relevant constraints. The Secretary of State should be satisfied that measures which seek to further the purposes of the designation are sufficient, appropriate and proportionate to the type and scale of the development.	The majority of the Scheme is located outside of the CNL. The northern boundary of Lime Down A and western boundary of Lime Down B and Lime Down C are located within 10 m of the Cotswold National Landscape. The Applicant has adopted a “landscape led” approach to design, giving due weight to the intrinsic character and beauty of the surrounding countryside (discussed in the **Design Approach Document [EN010168/APP/7.3]**). **ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswold National Landscape and its Special Qualities [EN010168/APP/6.3]** provides a standalone assessment of the effects of the Scheme on the CNL and its Special Qualities. The landscape and visual effects of the Scheme on the CNL and its Special Qualities have been mitigated throughout the landscape led, iterative design process that has been undertaken which has been informed by the Cotswold Nature Recovery Plan and in consultation with officers

Relevant Paragraph	Detail	Scheme Compliance
		at the CNL Board and Wiltshire Council. Embedded mitigation measures relating to the CNL include: • avoidance measures through the use of significant buffers for areas of the Scheme within the setting of the CNL and to maintain views. • protection of the existing landscape through buffers and offsets. • Retention and enhancement of the existing landscape framework including new planting and the re-establishment of historic hedgerows within the setting of the CNL, new areas of native woodland, trees, scrub and grassland, new planting within riparian corridors to enhance rivers and wetland, as well the restoration of dry-stone walls and creation of new ponds. • Positive enhancements to further the purpose of the CNL including, the creation of wildflower meadows, wildflower meadow verges and maintaining hedgerows at their current height to maintain open view of the landscape. **ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswold National Landscape and its Special Qualities [EN010168/APP/6.3]** concludes that there are no significant direct effects on the CNL or its Special Qualities. It is considered that these measures are sufficient, appropriate and proportionate to the scale of the Scheme.

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 5.10.11	Development within a Heritage Coast (that is not also a National Park, The Broads or an AONB) is unlikely to be appropriate, unless it is compatible with the natural beauty and special character of the area.	The Scheme is not situated within a Heritage Coast, therefore, this paragraph is not relevant.
Paragraph 5.10.12	Outside nationally designated areas, there are local landscapes that may be highly valued locally. Where a local development document in England or a local development plan in Wales has policies based on landscape or waterscape character assessment, these should be paid particular attention. However, locally valued landscapes should not be used in themselves to refuse consent, as this may unduly restrict acceptable development.	The Order Limits are situated within and in proximity to a number of local landscape character areas. A full baseline description is provided within **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** and associated appendices. The relevant landscape policies of the Wiltshire Core Strategy are set out in Section 8.3 of **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** and have informed the assessment. There are three local landscape character areas, as shown on **ES Volume 2, Figure 8-5-3: Local Landscape Character Areas [EN010168/APP/6.2]**. The three areas are: • LCT A: Limestone Lowland - LCA A3 - Broughton Gifford Limestone Lowland; • LCT B: Clay River Floodplain - B1: Avon Clay River Floodplain; and • LCT C: Open Clay Vale - LCA C2 - Semington Open Clay Vale. It was agreed with Wiltshire Council that LCT B and LCT C could be scoped out of the assessment as they are on the fringes of the 5 km Study Area and the 0.5

Relevant Paragraph	Detail	Scheme Compliance
		km Cable Route Corridor, however LCT A was scoped in and therefore informed the assessment. **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** sets out that with regard to the landscape effects of the Solar PV Sites, there would not be significant landscape effects upon the landscape fabric during construction or operation in Year 1. Once mitigation measures are established, significant beneficial effects would occur during operation from Year 15 and at decommissioning through enhancement to the landscape fabric. **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** also concludes that there would be significant adverse effects in the 1km local study area during construction and in Year 1 of operation which is primarily related to the change in land use from agriculture to the Scheme. At Year 15 and decommissioning the effect reduces to not significant. With regard to the Cable Route Corridor, no significant landscape effects would occur within the Cable Route Corridor Study Area with all effects being short term and temporary in nature with cables placed underground. Further in relation to post decommissioning and the legacy landscape, **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** concludes that the site would benefit from the significantly enhanced tree and hedgerow planting that has been carried out and has matured to create a much stronger and robust landscape, retaining, and enhancing the overall character and providing considerable biodiversity

Relevant Paragraph	Detail	Scheme Compliance
		benefits over the years. As a result, the landscape would be left in a better condition than current day.
Paragraph 5.10.13	All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites.	The Applicant has undertaken an iterative design process which responds to policy requirements set out in NPS EN-1 and NPS EN-3, published landscape character assessments and fieldwork analysis, desk studies, detailed fieldwork analysis and having regard to feedback from non-statutory, statutory and targeted consultation responses, in order to minimise harm to the landscape and reduce the visual effects of the Scheme. This has been achieved by balancing the need to generate a large amount of renewable energy, whilst responding to the local context and integrating the Scheme into its landscape setting, in accordance with national and local planning policies. As described in **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** an extensive range of mitigation and enhancement measures are proposed as part of the Scheme which reduce the landscape and visual effects of the Scheme as far as practicable. With mitigation in place, **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** concludes that in relation to visual effects, significant visual effects would be experienced by 9 private receptors during construction and at Year 1 Operation. These significant effects would fall away in Operation Year 15 and at decommissioning once landscaping has become established. For public receptors during each phase of

Relevant Paragraph	Detail	Scheme Compliance
		the Scheme, **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** concludes that during construction and at Operation Year 1, 27 public receptors would experience significant visual effects. As planting matures, at Operation – Year 15 and at decommissioning, significant effects would be reduced to 10 affected public receptors. For transport receptors, **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** confirms that during construction significant visual effects would occur to 12 transport receptors, reducing to 11 receptors during Year 1 of operation and no significant visual effects occurring during operation at Year 15 or during decommissioning. In terms of visual effects in the Cable Route Corridor, 6 significant effects would occur to private receptors during construction and to 7 public receptors as set out in **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]**. These receptors are located close to the Cable Route Corridor and would experience a change in views and visual amenity. No significant visual effects within the Cable Route Corridor Study Area would occur during operation (Year 1 or Year 15) or decommissioning. It should be noted that where significant long-term effects on public receptors remain at Year 15, this is primarily because mitigation is not proposed as it would not be appropriate to the long-term landscape character and the legacy landscape. For example, where footpaths diagonally cross fields, new hedgerows to screen views of infrastructure would not

Relevant Paragraph	Detail	Scheme Compliance
		be consistent with the regular pattern of fields which is characteristic of the existing landscape. Other instances of significant long-term visual effects on Public Receptors relate to the local topography where there are views from higher ground to infrastructure which cannot be fully alleviated by mitigation.
Paragraph 5.10.14	The Secretary of State will have to judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the project.	As recognised in NPS EN-1 paragraph 5.10.5, the development of new energy infrastructure, at the scale and speed required to meet the current and future need identified, is likely to have some negative effects on landscape and visual amenity which may not be able to be mitigated. Given the Scheme has sought to minimise impacts through design iteration and careful planting, it is considered that the Scheme accords with paragraphs 5.10.6 and 5.10.37 of NPS EN-1 and has taken account of the existing character and sensitivity of the landscape as set out in local policy. Furthermore, there will be a significant moderate benefit on the landscape fabric during operation at Year 15 and at decommissioning, that will be retained following the decommissioning of the Scheme, due to the landscape fabric and embedded mitigation measures. Although it is acknowledged that there will be an adverse effect on the landscape within the local study area (1km) at year 1 of operation, and to private, transport and public receptors that continues into Year 15 of operation and during the decommissioning phase, the benefits of the Scheme (including need) significantly outweigh these adverse effects.

Relevant Paragraph	Detail	Scheme Compliance
		The substantial benefits of the Scheme are set out in the **Planning Statement [EN010168/APP/7.2]** and include the contribution the Scheme makes to decarbonisation, the demand for electricity and security of supply, renewable energy generation, ecological and landscape enhancements, biodiversity net gain, the provision of 12.8 km of permissive paths, employment generation, economic benefits and skills training. It is therefore considered that the benefits of the Scheme outweigh the localised residual landscape and visual effects, and whilst they may be long term, the residual local landscape and visual effects will also be temporary. Overall, therefore it is considered that the Scheme accords with national and local landscape and visual amenity policies.
Paragraph 5.10.16	The applicant should carry out a landscape and visual impact assessment and report it in the ES, including cumulative effects (see Section 4.3). Several guides have been produced to assist in addressing landscape issues.	A Landscape and Visual Impact Assessment has been undertaken and included within **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** which includes a cumulative effects assessment, in accordance with Paragraph 5.10.16.
Paragraph 5.10.17	The landscape and visual assessment should include reference to any landscape character assessment and associated studies as a means of assessing landscape impacts relevant to the proposed project. The applicant's assessment should also take account of any relevant policies based on these assessments in local development documents in England and local development plans in Wales.	The Landscape and Visual Impact Assessment has been undertaken and included within **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** and it also includes references to local and national landscape character assessments and associated studies as a means of assessing landscape impacts. **Annex B: Local Policy Accordance Tables** of the **Planning Statement [EN010168/APP/7.2],** takes account of relevant

Relevant Paragraph	Detail	Scheme Compliance
		policies based on these assessments in local development documents.
Paragraph 5.10.19	The applicant should consider landscape and visual matters in the early stages of siting and design, where site choices and design principles are being established. This will allow the applicant to demonstrate in the ES how negative effects have been minimised and opportunities for creating positive benefits or enhancement have been recognised and incorporated into the design, delivery and operation of the scheme.	Landscape and visual matters have been considered throughout the design evolution process. **ES Volume 3, Appendix 4-1 Site Selection Assessment Report [EN010168/APP/6.3]** details the site selection process while the **Design Approach Document [EN010168/APP/7.3]** sets out key design considerations. As set out in the **Design Approach Document [EN010168/APP/7.3],** the Applicant has adopted a "landscape led" approach to design, giving due weight to the intrinsic character and beauty of the surrounding countryside. Good design has been a key consideration from the outset, which has informed and shaped the design, layout and landscape design as discussed in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1**] and the **Design Approach Document [EN010168/APP/7.3]**. The **Design Approach Document [EN010168/APP/7.3]** sets out the design principles that have provided a framework for the design evolution of the Scheme. Changes that were made to mitigate landscape and visual impacts include the removal of some fields from the Scheme, and also the removal of panels in some locations. Furthermore, the **Design Principles and Parameters [EN010168/APP/7.4]** set out the design principles and parameters by which the Scheme has been designed

Relevant Paragraph	Detail	Scheme Compliance
		and the Environmental Impact Assessment has been undertaken. The design principles set out in the **Design Approach Document [EN010168/APP/7.3]** have informed the parameters, as set out in **Design Principles and Parameters [EN010168/APP/7.4]**. The parameters contained within the **Design Principles and Parameters [EN010168/APP/7.4]** are secured under Requirement 5 (detailed design approval) in the **Draft DCO [EN010168/APP/3.1]** and apply to the detailed design of the Scheme, post consent.
Paragraph 5.10.20	The assessment should include the effects on landscape components and character during construction and operation. For projects which may affect a National Park, The Broads or an AONBs the assessment should include effects on the natural beauty and special qualities of these areas'.	**ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** includes the effects on landscape and visual receptors during construction, operation (at Year 1 and Year 15) and decommissioning. Further **ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswold National Landscape and its Special Qualities [EN010168/APP/6.3]** provides a standalone assessment of the effects of the Scheme on the Cotswolds National Landscape (CNL) and its Special Qualities. The landscape and visual effects of the Scheme on the CNL and its Special Qualities have been mitigated throughout the landscape led, iterative design process that has been undertaken which has been informed by the Cotswold Nature Recovery Plan and in consultation with officers at the CNL and Wiltshire Council. Embedded mitigation measures relating to the CNL include: • avoidance measures through the use of significant buffers for areas of the Scheme

Relevant Paragraph	Detail	Scheme Compliance
		within the setting of the CNL and to maintain views. • protection of the existing landscape through buffers and offsets. • Retention and enhancement of the existing landscape framework including new planting and the re-establishment of historic hedgerows within the setting of the CNL, new areas of native woodland, trees, scrub and grassland, new planting within riparian corridors to enhance rivers and wetland, as well the restoration of dry-stone walls and creation of new ponds. • Positive enhancements to further the purpose of the CNL including, the creation of wildflower meadows, wildflower meadow verges and maintaining hedgerows at their current height to maintain open view of the landscape. **ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswold National Landscape and its Special Qualities [EN010168/APP/6.3]** concludes that there are no significant direct effects on the CNL or its Special Qualities. It is considered that these measures are sufficient, appropriate and proportionate to the scale of the Scheme.
Paragraph 5.10.21	The assessment should include the visibility and conspicuousness of the project during construction and of the presence and operation of the project and potential impacts on views and visual amenity. This	**ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** considers the effects on landscape and visual receptors during construction, operation and maintenance and decommissioning of

Relevant Paragraph	Detail	Scheme Compliance
	should include light pollution effects, including on dark skies, local amenity, and nature conservation.	the Scheme. There are landscape and visual effects during construction of the Scheme, however these reduce over time as mitigation measures, in the form of planting and screening, mature. Section 8.10 of **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** provides an assessment on landscape receptors and visual receptors including private receptors. Lighting has been considered in the assessment, and as set out in Table 8-11 of **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]**, lighting has been considered in the landscape design parameters with embedded mitigation being: • As lighting is not required within the Solar PV Arrays for the operational phase, motion sensing security lighting will be provided within substations and within the BESS to be used only for maintenance and security purposes. • Temporary site lighting during construction will be required to enable safe working during construction and decommissioning during hours of darkness and will be designed as far as reasonably practicable to minimise potential for light spillage outside the Sites and Cable Route Corridor, particularly towards houses, traffic and ecological habitats, as set out in the **Outline CEMP [EN010168/APP/7.12].** • Standard good practice measures would be employed to minimise light spill, including glare

Relevant Paragraph	Detail	Scheme Compliance
		during construction, operation and decommissioning. • No lighting will be located on PV perimeter fencing. **ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswold National Landscape and its Special Qualities [EN010168/APP/6.3]** provides an assessment of the special qualities of the CNL, including dark skies. It is recognised that the CNL's dark skies contribute to a high-quality night-time environment for both residents and wildlife, supporting astronomical visibility and nocturnal ecological patterns. Therefore, the Scheme's lighting design is specifically tailored to avoid any perceptual or ecological intrusion. Also, the Scheme incorporates a no permanent external lighting policy, with only occasional use of motion-activated, dark-sky-compliant fittings for security purposes. All lighting would be full cut-off, directional, and shielded to prevent upward or outward light spill. As a result, no measurable change to skyglow or light trespass would occur within the CNL. **ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswold National Landscape and its Special Qualities [EN010168/APP/6.3]** concludes that the high sensitivity of the CNL is offset by the complete avoidance of lighting impacts, resulting in negligible significance, and that the Scheme has been designed to ensure that the CNL's dark skies remain entirely intact.

Relevant Paragraph	Detail	Scheme Compliance
		Mitigation measures are incorporated into the Scheme as shown within **Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2]**, which forms part of the **Outline LEMP [EN010168/APP/7.18]**. Requirement 7 of the **Draft DCO [EN010168/APP/3.1]** requires the submission and approval of a landscape and ecological management plan to be substantially in accordance with the **Outline LEMP [EN010168/APP/7.18]** and for the landscape and ecological management plan to be implemented as approved.
Paragraph 5.10.22	The assessment should also address the landscape and visual effects of noise and light pollution, and other emissions (see Section 5.2 and Section 5.7), from construction and operational activities on residential amenity and on sensitive locations, receptors and views, how these will be minimised.	The landscape and visual assessment set out in **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** has considered the construction, operational and decommissioning lighting proposals. Noise has not been considered in **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]**, however the noise assessment presented in **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1**] concludes that that, with embedded mitigation, there are no significant effects anticipated in relation to noise during the construction, operation and maintenance, or decommissioning phases of the Scheme. Light pollution has been minimised as a result of the following measures set out in **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]**:

Relevant Paragraph	Detail	Scheme Compliance
		• As lighting is not required within the Solar PV Arrays for the operational phase, motion sensing security lighting will be provided within substations and within the BESS to be used only for maintenance and security purposes. • Temporary site lighting during construction will be required to enable safe working during construction and decommissioning during hours of darkness and will be designed as far as reasonably practicable to minimise potential for light spillage outside the Sites and Cable Route Corridor, particularly towards houses, traffic and ecological habitats, as set out in the **Outline CEMP [EN010168/APP/7.12].** • Standard good practice measures would be employed to minimise light spill, including glare during construction, operation and decommissioning. • No lighting will be located on PV perimeter fencing. Residential amenity is considered in **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** where it concludes that the Scheme would not result in significant effects post Year 15 due to screening measures. Mitigation measures are set out in the **Outline LEMP [EN010168/APP/7.18]**, to be secured by Requirement 7 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].**

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 5.10.24	Applicants should consider how landscapes can be enhanced using landscape management plans, as this will help to enhance environmental assets where they contribute to landscape and townscape quality.	The **Outline LEMP [EN010168/APP/7.18]**, to be secured by Requirement 7 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**, provides a framework for the planting, management and monitoring of landscaping and ecological mitigation and enhancement habitats during the construction and operational phases of the Scheme. The overarching aim of the **Outline LEMP [EN010168/APP/7.18]** is to set out prescriptions for habitat creation and management in order to provide ecological enhancements, strengthen the green infrastructure within the local area, and to provide landscape and visual mitigation through screening of the Scheme, where necessary. The **Outline LEMP [EN010168/APP/7.18]** applies to Solar PV Sites at Lime Down A-E only as within the Cable Route Corridor (CRC), existing habitats will be restored following trenching works, and thereafter control of the land given back to the landowners. As such, it is not appropriate to include management of habitats within the CRC in the **Outline LEMP [EN010168/APP/7.18]**. In terms of the consideration of other management plans, the landscape and visual assessment set out in **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** takes account of the Cotswold National Landscape Management Plan and the Cotswold Nature Recovery Plan, which have been

Relevant Paragraph	Detail	Scheme Compliance
		prepared by the CNL Board. The CNL Management Plan and Cotswold Nature Recovery Plan have informed the enhancement measures proposed to further the purpose of the CNL in addition to consultation with the CNL Board and Wiltshire Council.
Paragraph 5.10.25	In considering visual effects it may be helpful for applicants to draw attention, in the supporting evidence to their applications, to any examples of existing permitted infrastructure they are aware of with a similar magnitude of impact on equally sensitive receptors. This may assist the Secretary of State in judging the weight they should give to the assessed visual impacts of the proposed development.	Examples of existing permitted infrastructure can be found in Section 8.13 (Cumulative Effects Assessment) of **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** which considers effects resulting from the Scheme in combination with the effects resulting from other similar developments, these being other renewable projects. Table 8-30 of **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** sets out the cumulative development sites that are included in the assessment. In terms of cumulative visual effects, **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** sets out that cumulative visual effects have been assessed on visual receptors, including private, public and transport receptors and that no visual relationship was recorded between any of the identified cumulative development sites and visual receptors. As such there are no significant cumulative visual effects as a result of the Scheme.
Paragraph 5.10.26	Reducing the scale of a project can help to mitigate the visual and landscape effects of a proposed project. However, reducing the scale or otherwise amending the design of a proposed energy infrastructure project may result in a significant operational constraint and reduction in function – for example, electricity	Good design has been a core consideration throughout the evolution of the Scheme. As set out within the **Design Approach Document [EN010168/APP/7.3]**, the layout and form of the Scheme has been informed by a number of factors, including the findings of the Landscape and Visual Impact Assessment (LVIA).

Relevant Paragraph	Detail	Scheme Compliance
	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.	Notably this has resulted in the removal of fields from the Order Limits and the exclusion of panels in some fields in order to minimise the landscape and visual effects of the Scheme. Panels have been removed from areas of Lime Down A, B, C, D and E, which aligns with the landscape led design principle (the design of the Scheme will be 'Landscape Led' and give due weight to the intrinsic character and beauty of the surrounding countryside). The **Design Approach Document [EN010168/APP/7.3]** explains the process of design evolution that has been undertaken within the framework provided by the design principles.
Paragraph 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.	The landscape and visual effects of the Scheme have been mitigated throughout the landscape led, iterative design process that has been undertaken. **ES Volume 3, Appendix 4-1 Site Selection Assessment Report** details the site selection process while the **Design Approach Document [EN010168/APP/7.3]** sets out key design considerations. **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** assesses visibility of the Scheme from a number of viewpoints agreed with Wiltshire Council and the CNL Board. The landscape led design approach has enabled on-site mitigation to be provided, including the removal of panels from areas within the Sites, that have significantly reduced the visual effects of the Scheme, with no off-site landscaping having been identified as necessary or appropriate.

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 5.10.30	The Secretary of State should be satisfied that local authorities will have sufficient design content secured to ensure future consenting will meet landscape, visual and good design objectives.	The embedded landscape mitigation and enhancement measures are incorporated into the Scheme as shown within **ES Volume 2, Chapter 3: Scheme Description** and **Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2],** which forms part of the **Outline LEMP [EN010168/APP/7.18]**. Requirement 7 of the **Draft DCO [EN010168/APP/3.1]**, to be discharged by the local planning authority, requires the submission and approval of a landscape and ecological management plan to be substantially in accordance with the **Outline LEMP [EN010168/APP/7.18]** and for the landscape and ecological management plan to be implemented as approved. These measures and controls will ensure that the detailed design of the Scheme incorporates the landscape mitigation and enhancements included within the **Outline LEMP [EN010168/APP/7.18]**. Furthermore, the **Design Principles and Parameters [EN010168/APP/7.4]** set out the design principles and parameters by which the Scheme has been designed and the Environmental Impact Assessment has been undertaken. The design principles have informed the parameters, as set out in **Design Principles and Parameters [EN010168/APP/7.4]**. The parameters contained within the **Design Principles and Parameters [EN010168/APP/7.4]** are secured under Requirement 5 (detailed design approval) in the **Draft**

Relevant Paragraph	Detail	Scheme Compliance
		DCO [EN010168/APP/3.1] and apply to the detailed design of the Scheme, post consent.
Paragraph 5.10.32	When considering applications for development within National Parks, the Broads and AONBs the conservation and enhancement of the natural beauty should be given substantial weight by the Secretary of State in deciding on applications for development consent in these areas. The Secretary of State may grant development consent in these areas in exceptional circumstances. Such development should be demonstrated to be in the public interest and consideration of such applications should include an assessment of: • the need for the development, including in terms of national considerations, and the impact of consenting or not consenting it upon the local economy; • the cost of, and scope for, developing all or part of the development elsewhere outside the designated area or meeting the need for it in some other way, taking account of the policy on alternatives set out in Section 4.3; and • any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.	The vast majority of the Scheme is outside the boundaries of the CNL, with four areas of Highways Improvement Areas (being 2.16 ha) within the CNL. The Applicant has set out how the Scheme meets this test in the Planning Statement [APP-267] at section 8.3: Landscape and Visual Impact (see from paragraph 8.3.210). To summarise: 1. The need for the development is established as set out in section 5 of the **Planning Statement [APP-267] and the Statement of Need [APP-266]**. Further, the Scheme is anticipated to have a positive impact on both the local and national economies, as set out in **ES Volume 1, Chapter 16: Socio-economics, Tourism and Recreation [APP-068]**. 2. The Applicant has considered the scope for developing the Scheme elsewhere through its considerations of alternatives set out in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185].** In relation to the specific elements of the Scheme within the CNL, the Applicant has considered alternative construction routes to avoid construction routes

Relevant Paragraph	Detail	Scheme Compliance
		through the CNL as set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**, and the **Technical Note on Construction Routes in the Cotswolds National Landscape [EXAM-9.15]** but none of the alternatives are considered suitable. Further, Wiltshire Council has confirmed in its relevant representation (Appendix A) [**RR-4934**] that the chosen route (through the CNL) is the best option of the alternatives considered. **3.** The Applicant has assessed the effects on the environment, the landscape and recreational opportunities as reported in the **ES [APP-052 to APP-265]** and summarised in the **Tranquillity Technical Note [PDA-010].** No significant effects are anticipated on receptors within or directly adjacent to the CNL in relation to landscape, cultural heritage, transport and access, and noise and vibration. Significant effects are anticipated in relation to a number of visual and recreation and tourism receptors, which have been taken into account in the planning balance, and it is considered that these effects are far outweighed by the benefits of the Scheme, which includes enhancements to PRoW, such as proposed permissive paths.

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 5.10.33	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 Secretary of State should ensure that any projects consented in these designated areas should be carried out to high environmental standards, including through the application of appropriate requirements where necessary.	Section 8.3: Landscape and Visual Impact of the **Planning Statement [APP-267]** (from paragraph 8.3.225) sets out the Scheme's compliance with NPS EN-1 paragraph 5.10.33. **ES Volume 3, Appendix 8-6: Assessment of the Effects on the Cotswolds National Landscape and its Special Qualities [APP-197]** sets out the measures that have been implemented in the design of the Scheme to seek to further the CNL's purposes. Further details are set out in the appraisal at paragraph 8.3.193 of the Planning Statement [**APP-267**]. With regard to the specific elements of the Scheme within the CNL (being four Highway Improvement Areas comprising 2.16 ha), these will be carried out to high environmental standards. The **Technical Note on Construction Routes in the Cotswolds National Landscape [EXAM-9.15]** submitted at Deadline 1 provides further details, including that the Applicant will agree to sensitive construction details, such as conservation kerbs, to be secured through the technical approval process and final CTMPs. The preparation, approval and implementation of the final CTMPs, substantially in accordance with the **Outline CTMP [APP-287],** are secured through Requirement 15 of Schedule 2 of the **Draft DCO [APP-016],** ensuring construction traffic impacts are appropriately

Relevant Paragraph	Detail	Scheme Compliance
		managed throughout the construction phase of the Scheme.
Paragraph 5.10.34	The duty to seek to further the purposes of nationally designated landscapes also applies when considering applications for projects outside the boundaries of these areas, which may have impacts within them. The aim should be to avoid harming the purposes of designation or to minimise adverse effects on designated landscapes, and such projects should be designed sensitively given the various siting, operational, and other relevant constraints. The fact that a proposed project will be visible from within a designated area should not in itself be a reason for the Secretary of State to refuse consent.	The majority of the Scheme is located outside of, the CNL, and a very small section (2.16 ha) of the Scheme is located within CNL. Some parts of the Scheme are considered to be in the setting of the CNL. The works within the CNL comprise minor highway works to facilitate construction traffic. **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** sets out the alternative construction routes that were considered, and concludes that the proposed construction route through the CNL is considered to be the least constrained in terms of both meeting the needs of the Scheme and minimising environmental effects. The Applicant has modified the Scheme to reduce adverse impacts on the CNL. This includes removing certain fields from the Order Limits in areas near the CNL and omitting panels from retained fields elsewhere. These changes aim to minimise negative effects and support the conservation and enhancement of the CNL's natural beauty. **ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswold National Landscape and its Special Qualities [EN010168/APP/6.3]** provides a standalone assessment of the effects of the Scheme on the Cotswolds National Landscape (CNL) and its

Relevant Paragraph	Detail	Scheme Compliance
		Special Qualities. The landscape and visual effects of the Scheme on the CNL and its Special Qualities have been mitigated throughout the landscape led, iterative design process that has been undertaken which has been informed by the Cotswold Nature Recovery Plan and in consultation with officers at the CNL and Wiltshire Council. Embedded mitigation measures relating to the CNL include: • avoidance measures through the use of significant buffers for areas of the Scheme within the setting of the CNL and to maintain views. • protection of the existing landscape through buffers and offsets. • Retention and enhancement of the existing landscape framework including new planting and the re-establishment of historic hedgerows within the setting of the CNL, new areas of native woodland, trees, scrub and grassland, new planting within riparian corridors to enhance rivers and wetland, as well the restoration of dry-stone walls and creation of new ponds. • Positive enhancements to further the purpose of the CNL including, the creation of wildflower meadows, wildflower meadow verges and maintaining hedgerows at their current height to maintain open view of the landscape.

Relevant Paragraph	Detail	Scheme Compliance
		As a result of the above mitigation embedded within the Scheme **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** concludes that there are moderate significant beneficial effects on the landscape fabric of the site within the setting of the CNL. **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** also notes that although significant landscape effects have been recorded within the 1 km Local Study Area of the Lime Down Sites, these effects are primarily related to the change in land use from agriculture to the solar infrastructure. This change does not directly affect the CNL as the buffers to the Scheme provided by the avoidance measures and layers of proposed mitigation planting would contain the Scheme away from the edge of the CNL. As such, the Scheme would be barely discernible from within the CNL. As demonstrated, the Scheme has been sensitively designed to avoid harming and minimising adverse effects on the CNL.
Paragraph 5.10.35	The scale of energy projects means that they will often be visible across a very wide area. The Secretary of State should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project.	As recognised in NPS EN-1 paragraph 5.10.5, the development of new energy infrastructure, at the scale and speed required to meet the current and future need identified, is likely to have some negative effects on landscape and visual amenity which may not be able to be mitigated. **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** sets out that with regard to the

Relevant Paragraph	Detail	Scheme Compliance
		landscape effects of the Solar PV Sites, there would not be significant landscape effects upon the landscape fabric during construction or operation in Year 1. Once mitigation measures are established, significant beneficial effects would occur during operation from Year 15 and at decommissioning through enhancement to the landscape fabric. **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** also concludes that there would be significant adverse effects in the 1 km local study area during construction and in Year 1 of operation which is primarily related to the change in land use from agriculture to the Scheme. At Year 15 and decommissioning the effect reduces to not significant. With regard to the Cable Route Corridor, no significant landscape effects would occur within the Cable Route Corridor Study Area with all effects being short term and temporary in nature with cables placed underground. The substantial benefits of the Scheme are set out in the **Planning Statement [EN010168/APP/7.2]** and include the contribution the Scheme makes to decarbonisation, the demand for electricity and security of supply, renewable energy generation, ecological and landscape enhancements, biodiversity net gain, the provision of 12.8 km of permissive paths, employment generation, economic benefits and skills training.

Relevant Paragraph	Detail	Scheme Compliance
		Overall, it is considered that the substantial benefits outweigh the localised residual landscape and visual effects, and whilst they may be long term, the residual local landscape and visual effects will also be temporary.
Paragraph 5.10.36	In reaching a judgement, the Secretary of State should consider whether any adverse impact is temporary, such as during construction, and/or whether any adverse impact on the landscape will be capable of being reversed in a timescale that the Secretary of State considers reasonable.	As set out in **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]**, construction and decommissioning stage impacts will be for a relatively short duration, and operational effects beginning at Year 1 will reduce over time as mitigation planting establishes. The change to the landscape character, via the introduction of solar panels and associated infrastructure is considered to be localised. The reduction of effects over time and the reversibility of effects has been taken into consideration when reaching a judgement on the Application. All operational effects will be reversed following 60 years of operation, which is secured by the DCO Requirements, and all adverse landscape and visual effects identified during the construction and decommissioning phases are short term and temporary. The **Decommissioning Strategy [EN010168/APP/7.14]** sets out that when the operation and maintenance phase ends, the Solar PV Sites would be decommissioned and the land returned to its original use and condition as far as practicable and returned to the landowner. Furthermore, as set out in **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]**, following decommissioning, the

Relevant Paragraph	Detail	Scheme Compliance
		site would benefit from the significantly enhanced tree and hedgerow planting that has been carried out and has matured to create a much stronger and robust landscape, retaining, and enhancing the overall character and providing considerable biodiversity benefits over the years. Therefore, as a result of the Scheme, the landscape would be left in a better condition than current day, however it should be noted that the ongoing retention of mitigation planting cannot be assured once the land reverts back to the landowner at the conclusion of the lease.
Paragraph 5.10.37	The Secretary of State should consider whether the project has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to minimise harm to the landscape, including by appropriate mitigation.	The Scheme has been designed taking into account the environmental effects on the landscape, siting, operational and other relevant constraints, to minimise adverse impacts on the landscape, including by appropriate mitigation. This is outlined in **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1** and the **Outline LEMP [EN010168/APP/7.18]** to be secured by Requirement 7 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].**
Paragraph 5.10.38	The Secretary of State should consider whether requirements to the consent are needed requiring the incorporation of particular design details that are in keeping with the statutory and technical requirements for landscape and visual impacts.	The Scheme has been designed within a framework of provided by design principles, as set out in the **Design Approach Document [EN010168/APP/7.3]**. The design principles have informed the parameters (including the landscape led design principle), set out in **Design Principles and Parameters [EN010168/APP/7.4]** which are secured under Requirement 5 (detailed design approval) in the **Draft**

Relevant Paragraph	Detail	Scheme Compliance
		DCO [EN010168/APP/3.1] and apply to the detailed design of the Scheme, post consent.
Land Use, Including Open Space, Green Infrastructure, and Green Belt		
Paragraph 5.11.4	Development of land will affect soil resources, including physical loss of and damage to soil resources, through land contamination and structural damage. Indirect impacts may also arise from changes in the local water regime, organic matter content, soil biodiversity and soil process.	**ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]** has been prepared which assesses the direct and indirect impacts on soil resources. It also sets out the measures to manage any potential impacts to the soil (and agricultural land) during the construction, operational (including maintenance) and decommissioning phases, and an **Outline Soil Resources Management Plan (SRMP) [EN010168/APP/7.15]** has been prepared which will is secured by Requirement 17 of the **Draft DCO [EN010168/APP/3.1]**. **ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]** sets out industry standard good practice measures for the handling and management of soil resources based upon guidance such as Defra's Code of Practice for the Sustainable Use of Soil on Construction Sites, and these are further described in the **Outline CEMP [EN010168/APP/7.12]** and **Outline Soil Resources Management Plan (SRMP) [EN010168/APP/7.15].** A detailed CEMP and SRMP prior to the commencement of works in site will be secured by a requirement as part of the **Draft DCO [EN010168/APP/3.1]**.

Relevant Paragraph	Detail	Scheme Compliance
		ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1] sets out that agricultural use within the Order Limits would cease during construction and operation and maintenance of the Scheme. This would result in a long-term (approximately 60 years), but reversible, loss of over 50 hectares of agricultural land - representing a high-magnitude impact. However, it is concluded that the removal of the Principal Site from arable production and the planting of semi-improved grassland (as set out in the **Outline LEMP [EN010168/APP/7.18]**) will provide benefits to the quality of the soil, resulting in a significant beneficial effect. This will be secured through Requirement 7 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].**
Paragraph 5.11.8	The ES (see Section 4.3) should identify existing and proposed land uses near the project, any effects of replacing an existing development or use of the site with the proposed project or preventing a development or use on a neighbouring site from continuing. Applicants should also assess any effects of precluding a new development or use proposed in the development plan. The assessment should be proportionate to the scale of the preferred scheme and its likely impacts on such receptors. For developments on previously developed land, the applicant should ensure that they have considered the risk posed by land contamination and how it is proposed to address this.	Section 8.3 of the **Planning Statement [EN010168/APP/7.2]** identifies the existing and proposed land use within the Order Limits. Land within the Order Limits is largely used for agriculture. The Applicant has ensured in its site selection for the Scheme that local site allocations within the Wiltshire Development Plan are avoided, with none being present within the Order Limits (discussed further in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3])**. Therefore, the Scheme will not preclude proposed land uses that are allocated within the Wiltshire Development Plan.

Relevant Paragraph	Detail	Scheme Compliance
		With regard to proposed land uses nearby, **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1]** considers other nearby proposed developments and the potential for cumulative effects and effect interactions as a result of the Scheme. The assessment identifies that, taking a conservative worse case approach, significant cumulative effects with the short list of developments are identified at a limited and discrete number of receptors comprising tourism and recreation impacts during the construction phase for example, on Corsham Park, PRoW WT|CORM|122, WT|HULL|29, and Sustrans Cycle Route 403, and on skylark at a District level. However as set out in the **Planning Statement [EN010168/APP/7.2]**, these significant cumulative effects have only been identified during the construction phase and do not continue into the operation of the Scheme. Accordingly, significant cumulative effects are limited to the short-term. Furthermore, inter project communication will take place to minimise tourism and recreation impacts whilst the impact to skylark is likely to reduce to not significant as and when further details of mitigation are proposed in any application to discharge the relevant conditions of 18/08271/OUT (which would be required before any development could take place), the effect is likely to be reduced to not significant. Within the majority of technical chapters, no likely significant effects have been identified through the cumulative effects assessment where they were not already predicted for the Scheme in isolation.

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 5.11.12	Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5).	Agricultural land quality was a key consideration in the Applicant's site selection process. As set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1],** the Applicant has sought to identify non-BMV agricultural land in its site selection for the Scheme. **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3]** sets out the six stage approach adopted when assessing other suitable alternative sites for the Scheme and confirms that in the initial search for sites, agricultural land within a classification of Grade 3, Grade 2 or Grade 1 was excluded from the search in order to identify sites on non-BMV land. In addition non-agricultural land, such as rooftops and previously developed land was considered, however none of the alternative sites (on non-agricultural land or lower quality agricultural land) were assessed to be viable for the Scheme, and therefore Grade 3 agricultural land was added to the search area. Of the 749.3 ha making up the Solar PV Sites, 717.5 ha is agricultural land. Across the Solar PV Sites, the land is primarily in arable use, with some areas of grassland in Lime Down B, C and E. The ALC grading for the Solar PV Sites, as informed by soil surveys, is set out in **ES Volume 3, Appendix 17-1 Agricultural Land Classification and Soil Resource Survey Report [EN010168/APP/6.3]**. The majority of the Solar PV Sites (67%) comprise land within Subgrades 3b and 4 and therefore is not best and most versatile (BMV) agricultural land. Approximately 242 ha of the Solar PV Sites is classified as BMV quality, mostly in Subgrade

Relevant Paragraph	Detail	Scheme Compliance
		3a (the lowest grade of BMV land) with a small proportion of Grade 2. There is no Grade 1 land (being the highest grade) within the Solar PV Sites. The Scheme is temporary and reversible in nature and therefore will not affect the long-term agricultural resource. Upon decommissioning, all land (including the BESS Area and substations) will be returned to its previous use and condition as far as is practicable. The decommissioning measures set out in the **Outline Decommissioning Strategy [EN010168/APP/7.14]** are secured by Requirement 20 in Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**. The design of the Solar PV Sites allows some farming practices to continue during operation of the Scheme, such as sheep grazing, therefore, whilst the land would not be available for crop production, there may be an opportunity to limit the effects on agricultural production during the Scheme's lifetime through other forms of agricultural practice. Mitigation is proposed as set out in the **Outline Soil Resources Management Plan [EN010168/APP/7.15]** to reduce the effects on soils as a result of the Scheme. Whilst the construction of the Scheme is anticipated to result in temporary moderate adverse residual significant effects on soil resources (through construction site activities), there are also anticipated temporary moderate benefits to soil health at

Relevant Paragraph	Detail	Scheme Compliance
		decommissioning as a result of removing the land from intensive agricultural practices for the Scheme's lifetime. Further details are provided in **ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]**. The benefits of the Scheme justify the inclusion of BMV land, namely the Scheme's contribution to meeting the established and urgent need for renewable energy infrastructure such as solar, which has been identified as a critical national priority in NPS EN-1 Part 4.2 and the other wider economic and environmental benefits set out in Section 5 of the **Planning Statement [EN010168/APP/7.2].**
Paragraph 5.11.14	Applicants are encouraged to develop and implement a Soil Management Plan which could help minimise potential land contamination. The sustainable reuse of soils needs to be carefully considered in line with good practice guidance where large quantities of soils are surplus to requirements or are affected by contamination	**ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]** sets out industry standard good practice measures for the handling and management of soil resources based upon guidance such as Defra's Code of Practice for the Sustainable Use of Soil on Construction Sites, and these are further described in the **Outline CEMP** [**EN010168/APP/7.12]** secured through Requirement 13 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].** An **Outline Soil Resources Management Plan (SRMP)** [**EN010168/APP/7.15]** is provided as part of this application which sets out the overall approach to managing soil resources affected by the Scheme.
Paragraph 5.11.17	Applicants should ensure that a site is suitable for its proposed use, taking account of ground conditions and any risks arising from land instability and contamination.	Ground conditions and contamination are assessed in **ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1]**. Preliminary Risk Assessments

Relevant Paragraph	Detail	Scheme Compliance
		(PRA) have been undertaken for each of the Solar PV Sites and the Cable Route Corridor to assess the current land condition within the Order Limits and identify any potential contaminants. The PRAs are set out at **ES Volume 3, Appendices 19-1 to 19-8 [EN0101068/APP/6.3]** and the key findings are set out in **ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP6.1].** The assessment concludes, following the implementation of embedded and additional mitigation measures as set out in Sections 19.10 and 19.12 of the chapter that there is not expected to be any likely residual significant effects associated with ground conditions. Best practice and bespoke mitigation measures will be carried out during construction, operation and decommissioning to reduce nuisance impacts from dust generation, soil removal and waste generation and avoid impact on ground conditions. **ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1]** concludes that, with implementation of the embedded and additional mitigation measures as set out in Sections 19.10 and 19.12 of the chapter, no likely residual significant effects are anticipated. The proposed mitigation includes the measures set out in the **Outline CEMP [EN010168/APP/7.12], Outline SWMP [EN010168/APP/7.16] and Outline SRMP**

Relevant Paragraph	Detail	Scheme Compliance
		[EN010168/APP/7.15] to manage the hazards associated with contaminants during the construction phase of the Scheme, and similarly measures in the **Outline OEMP [EN010168/APP/7.13]** and **Outline Decommissioning Strategy [EN010168/APP/7.14]** for the operation and maintenance and decommissioning phases. The measures outlined in the outline management plans will be secured by Requirements in Schedule 2 of the **Draft DCO [EN010168/APP/3.1].**
Paragraph 5.11.19	Applicants should safeguard any mineral resources on the proposed site as far as possible, taking into account the long-term potential of the land use after any future decommissioning has taken place.	As set out in **ES Volume 1, Chapter 20: Other Environmental Matters** there are no safeguarded mineral resources within the Solar PV Sites identified in the Wiltshire and Swindon Minerals Local Plan. The Cable Route Corridor between each of the Solar PV Sites (the Interconnecting Cables) do not affect any safeguarded minerals. The Cable Route Corridor between the Solar PV and point of connection, crosses a Mineral Safeguarding Area (MSA) between Corsham and Whitley, Monks Park Mine, located 700 m west of Gastard off Monks Lane. The Corridor affects approximately 10.4 ha on the mine's eastern side. In addition, river terrace deposits near the River Avon, south of Chippenham, are recognised as a potential sand and gravel resource. Approximately 3.7 ha of this identified Mineral Resource Zone is affected by the Cable Route Corridor near the Melksham Substation.

Relevant Paragraph	Detail	Scheme Compliance
		ES Volume 1, Chapter 20: Other Environmental Matters sets out the likely effects of the Scheme on minerals and concludes overall, following the implementation of embedded mitigation measures, there will be no significant residual effects on minerals and no permanent sterilisation of resources. Policy MDC4 of the Wiltshire and Swindon Minerals Development Control Policies Development Plan Document (September 2009) are assessed in **Annex B: Local Policy Accordance Tables** of the **Planning Statement [EN010168/APP/7.2]**.
Paragraph 5.11.23	Although in the case of most energy infrastructure there may be little that can be done to mitigate the direct effects of an energy project on the existing use of the proposed site (assuming that some of that use can still be retained post project construction) applicants should nevertheless seek to minimise these effects and the effects on existing or planned uses near the site by the application of good design principles, including the layout of the project and the protection of soils during construction.	The existing use of the land within the Order Limits is primarily agricultural. Of the 749.3 ha making up the Solar PV Sites, 717.5 ha is agricultural land. Across the Solar PV Sites, the land is primarily in arable use, with some areas of grassland in Lime Down B, C and E. The ALC grading for the Solar PV Sites, as informed by soil surveys, is set out in **ES Volume 3, Appendix 17-1 Agricultural Land Classification and Soil Resource Survey Report [EN010168/APP/6.3]**. The majority of the Solar PV Sites (67%) comprise land within Subgrades 3b and 4 and therefore is not best and most versatile (BMV) agricultural land. Approximately 242 ha of the Solar PV Sites is classified as BMV quality, mostly in Subgrade 3a (the lowest grade of BMV land) with a small proportion of

Relevant Paragraph	Detail	Scheme Compliance
		Grade 2. There is no Grade 1 land (being the highest grade) within the Solar PV Sites. The Scheme therefore utilises poorer quality agricultural land seeking and includes mitigation measures to reduce impacts on the soil resource. As set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1],** the Applicant sought to identify non-BMV agricultural land in its site selection for the Scheme. **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3]** sets out the six stage approach adopted when assessing alternative sites for the Scheme and confirms that in the initial search for sites, agricultural land within a classification of Grade 3, Grade 2 or Grade 1 was excluded from the search in order to identify sites on non-BMV land. In addition, non-agricultural land, such as rooftops and previously developed land was considered, however none of the alternative sites (on non-agricultural land or lower quality agricultural land) were assessed to be viable for the Scheme, and therefore Grade 3 agricultural land was added to the search area. The Scheme is temporary and reversible in nature and therefore will not affect the long-term agricultural resource. Upon decommissioning, all land (including the BESS Area and substations) will be returned to its previous use and condition as far as is practicable. The decommissioning measures set out in the **Outline**

Relevant Paragraph	Detail	Scheme Compliance
		Decommissioning Strategy [EN010168/APP/7.14] are secured by Requirement 20 in Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**. The design of the Solar PV Sites allows some farming practices to continue during operation of the Scheme, such as sheep grazing, therefore, whilst the land would not be available for crop production, there may be an opportunity to limit the effects on agricultural production during the Scheme's lifetime through other forms of agricultural practice. Mitigation is proposed as set out in the **Outline Soil Resources Management Plan [EN010168/APP/7.15]** to reduce the effects on soils as a result of the Scheme. Whilst the construction of the Scheme is anticipated to result in temporary moderate adverse residual significant effects on soil resources (through construction site activities), there are also anticipated temporary moderate benefits to soil health at decommissioning as a result of removing the land from intensive agricultural practices for the Scheme's lifetime. Further details are provided in **ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]**. The benefits of the Scheme justify the inclusion of BMV land, namely the Scheme's contribution to meeting the established and urgent need for renewable energy infrastructure such as solar, which

Relevant Paragraph	Detail	Scheme Compliance
		has been identified as a critical national priority in NPS EN-1 Part 4.2 and the other wider economic and environmental benefits set out in Section 5 of the **Planning Statement [EN010168/APP/7.2].**
Paragraph 5.11.27	Existing trees and woodlands should be retained wherever possible. In the EIP, the Government committed to increase the tree canopy and woodland cover to 16.5% of total land 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.	The Scheme has been designed, as far as practicable, to avoid and reduce impacts and effects on Arboriculture by embedding mitigation measures into the design. In addition, how the Scheme is constructed, operated and maintained and decommissioned would be controlled in order to manage and minimise potential environmental effects (required as a result of legislative requirements and/or standard sectoral practices). As set out in **ES Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1]** embedded mitigation includes significant tree and woodland planting in the Solar PV Sites and buffer zones to protect veteran trees The full list of embedded mitigation measures are set out in Section 10.9 of **ES Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1].**
Paragraph 5.11.28	Where a proposed development has an impact upon a Mineral Safeguarding Area (MSA), the Secretary of State should ensure that appropriate mitigation measures have been put in place to safeguard mineral resources.	There are no mining areas or mineral safeguarding areas (MSA) recorded within the Solar PV Sites but the Cable Route Corridor does pass through: • two small areas of the Bristol Avon Valley Mineral Resource Zone and MSA which cover approximately 3.7 ha in total; and

Relevant Paragraph	Detail	Scheme Compliance
		• a MSA identified for building stone between Corsham and Whitley which extends to 27.2 ha. The likely effects of the Scheme on minerals have been assessed in the **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** which concludes, following the implementation of embedded mitigation measures, there will be no significant residual effects on minerals.
Paragraph 5.11.30	Public Rights of way, National Trails, and other rights of access to land are important recreational facilities for example for walkers, cyclists and horse riders. The Secretary of State should expect applicants to take appropriate mitigation measures to address adverse effects on coastal access, National Trails, other rights of way and open access land and, where appropriate, to consider what opportunities there may be to improve or create new access. In considering revisions to an existing right of way, consideration should be given to the use, character, attractiveness, and convenience of the right of way.	PRoW MALW54 will be temporarily diverted for the duration of the construction phase for health and safety reasons and to avoid conflict with construction vehicles accessing Lime Down E, at Access 18. The diversion will run adjacent to the existing alignment. Once construction is complete, the PRoW will return to its existing alignment. PRoW GRIT20 (located in the Cable Route Corridor) will be temporarily diverted for the duration of the construction phase for health and safety reasons and to avoid conflict with construction vehicle access at Access 102. The diversion will run adjacent to the construction compound to the north and east. Once construction is complete, the PRoW will return to its existing alignment. Temporary closures may also be required during construction for installation of Grid Connection Cables, but this will likely last not more than one day (or

Relevant Paragraph	Detail	Scheme Compliance
		overnight). Where temporary closures are deemed to be necessary, these will be prioritised for overnight work (when there are unlikely to be PRoW users), and sufficient notice will be given to users and the local highway authority so far as practicable. PRoWs will be managed in accordance with the measures in the **Outline Public Rights of Way and Permissive Paths Management Plan [EN010168/APP/7.17]** to ensure user safety, for instance at construction vehicle crossings. As set out in **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP6.1],** there are no residual significant adverse effects anticipated on the existing PRoW network from a transport perspective. **ES Volume 1, Chapter 16: Socio-economics, Tourism and Recreation [EN010168/APP6.1]** anticipates medium-term temporary moderate adverse effects on PRoW, however, the overall impact of the Scheme on the 120 individual PRoW routes assessed is not anticipated to result in significant effects during these periods, demonstrating that the Scheme is not anticipated to have an overall significant effect on the local and wider PRoW network. During operation (except during replacement activities), overall there are no significant effects anticipated on the use, accessibility and desirability of PRoWs and recreational routes. Furthermore, the Scheme includes the creation of 12.8 km of new permissive paths, which

Relevant Paragraph	Detail	Scheme Compliance
		will be open up to 365 days per calendar year throughout the proposed 60-year operational lifetime of the Scheme.
Paragraph 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.	As set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1],** the Applicant has sought to identify non-BMV agricultural land in its site selection for the Scheme. **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3]** sets out the six stage approach adopted when assessing other suitable alternative sites for the Scheme and confirms that in the initial search for sites, agricultural land within a classification of Grade 3, Grade 2 or Grade 1 was excluded from the search in order to identify sites on non-BMV land. In addition non-agricultural land, such as rooftops and previously developed land was considered, however none of the alternative sites (on non-agricultural land or lower quality agricultural land) were assessed to be viable for the Scheme, and therefore Grade 3 agricultural land was added to the search area. Due to the size and nature of the Scheme, the Order Limits are predominantly located on agricultural land. As set out in **ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resource Survey Report [EN010168/APP/6.3]**, Agricultural Land Classification surveys have confirmed that the majority (67%) of the agricultural land within the Solar PV Sites comprises non-BMV Land. 33% of the agricultural land within the Solar PV Sites is BMV

Relevant Paragraph	Detail	Scheme Compliance
		Land, made up of 29% Subgrade 3a (209.3 ha) and 4% Grade 2 (30.8 ha). There are no areas of Grade 1 land within the Solar PV Sites. For the Cable Route Corridor, 75% of the agricultural land is classed as BMV (70% Grade 3a and 5% Grade 2). There are no areas of Grade 1 land within the Cable Route Corridor. The justification for inclusion of BMV land in the Scheme is as follows: • The parcels of Grade 2 land in Lime Down E are optimal for siting Solar PV Panels due to being south facing and their proximity to the rest of the Scheme, and their inclusion is required to offset the loss of locations for Solar PV Panels in other areas of the Scheme. • The Scheme is temporary and reversible in nature and therefore will not affect the long-term agricultural resource. Upon decommissioning, all land (including the BESS Area and substations) will be returned to its previous use and condition as far as is practicable. The decommissioning measures set out in the **Outline Decommissioning Strategy [EN010168/APP/7.14]** are secured by a Requirement in Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**. • The design of the Solar PV Sites is compatible with certain farming practices, such as sheep grazing, which could continue during operation of the Scheme. Therefore, whilst the land would

Relevant Paragraph	Detail	Scheme Compliance
		not be available for crop production, there may be an opportunity to limit the effects on agricultural production during the Scheme's lifetime through other forms of agricultural practice. • Mitigation is proposed as set out in the **Outline Soil Resources Management Plan [EN010168/APP/7.15]** to reduce the effects on soils as a result of the Scheme. Whilst the construction of the Scheme is anticipated to result in temporary moderate adverse residual significant effects on soil resources (through construction site activities), there are also anticipated temporary moderate benefits to soil health at decommissioning as a result of removing the land from intensive agricultural practices for the Scheme's lifetime. Further details are provided in **ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]**; and. • The substantial benefits of the Scheme justify the inclusion of BMV land, namely the Scheme's contribution to meeting the established and urgent need for renewable energy infrastructure such as solar, which has been identified as a critical national priority in NPS EN-1 Part 4.2.
Noise and Vibration		
Paragraph 5.12.4	Noise resulting from a proposed development can also have adverse impacts on wildlife and biodiversity. Noise	**ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** provides an assessment of the

Relevant Paragraph	Detail	Scheme Compliance
	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.	likely significant effects of noise on ecological receptors. As set out in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**, no significant impacts are anticipated as a result of noise on ecological receptors.
Paragraph 5.12.6	Where noise impacts are likely to arise from the proposed development, the applicant should include the following in the noise assessment: • a description of the noise generating aspects of the development proposal leading to noise impacts, including the identification of any distinctive tonal characteristics, if the noise is impulsive, whether the noise contains particular high or low frequency content or any temporal characteristics of the noise • identification of noise sensitive receptors and noise sensitive areas that may be affected • the characteristics of the existing noise environment • a prediction of how the noise environment will change with the proposed development ○ in the shorter term, such as during the construction period ○ in the longer term, during the operating life of the infrastructure ○ at particular times of the day, evening and night (and weekends) as	**ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** provides an assessment of noise impacts of the Scheme. Section 14.6 of **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** sets out the assessment methodology used to undertake the noise assessment, which includes the consideration of tonality, impulsivity, intermittency and other sound characteristics in line with BS 4142:2014. A description of noise generating aspects of the Scheme are also included in **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]**. Table 14-12 and Table 14-13 of **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** set out the identified noise receptors for the Solar PV Sites and the Cable Route Corridor respectively. 45 sensitive noise and vibration receptors have been identified for the Solar PV Sites, with 21 identified for the Cable Route Corridor.

Relevant Paragraph	Detail	Scheme Compliance
	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 • all reasonable steps taken to mitigate and minimise potential adverse effects on health and quality of life	Section 14.7 of **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** sets out the existing and future baseline characteristics of the noise environment. Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** provides an assessment of how the noise environment will change with the Scheme. Construction noise associated with the Scheme for both the Solar PV Site and Cable Route Corridor is considered from main construction activities, HDD activities, works at Melksham Substation, and construction traffic. Following embedded mitigation, two receptors (Neeld Court, A4 and Pudding Brook) where HDD crossing are required, would still experience noise levels above the SOAEL leading to a significant adverse effect. However, HDD activities are, at worst, expected to last three days and taking into account the temporary short-term nature of the activities it is considered these would be not significant with the implementation of a communication strategy with residents within 500 m. The communication strategy will be managed through the **Outline CEMP [EN010168/APP/7.12]** for which a detailed plan will be secured under Requirement 13 of Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**. The noise assessment detailed in **ES Volume 1, Chapter 14: Noise and Vibration**

Relevant Paragraph	Detail	Scheme Compliance
		[EN010168/APP/6.1] has taken the operation and maintenance phase of the Scheme into account and concludes that no receptors would be above the SOAEL for operational noise. Following implementation of all embedded and additional measures, no significant effects are anticipated as a result of noise from the operation and maintenance of the Scheme. The embedded mitigation measures represent Best Practicable Means and are secured within the **Outline CEMP [EN010168/APP/7.12]** for the Construction phase and the **Outline Decommissioning Strategy [EN010168/APP/7.14]** for the Decommissioning phase. Detailed plans will be secured by requirements 13 and 20 in Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**. The assessment set out in **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** has considered particular times of the day as appropriate, including noise impacts during the daytime and nighttime. **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** has provided an assessment of the effect of predicted changes in the noise environment on any noise-sensitive receptors. It concludes no significant residual effects are anticipated on any noise sensitive receptors following mitigation.

Relevant Paragraph	Detail	Scheme Compliance
		No disturbance to the underwater or subterranean environment will occur as a result of the Scheme. All reasonable steps have been taken to mitigate and minimise potential adverse effects on health and quality of life throughout the design process, with Table 14-2: in **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** sets out the engagement undertaken with the Environmental Health Department at Wiltshire Council. A number of embedded mitigation measures are set out in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1] in relation to construction and decommissioning** and include, but are not limited to: • Ensuring that all appropriate processes, procedures and measures are in place to minimise noise before works begin and throughout the construction programme; • When works are taking place within close proximity to sensitive receptors, the screening of noise sources via the erection of temporary screens would be employed where practicable; and • As far as practicable, works will be programmed to avoid noisy operations occurring simultaneously in close proximity to the same sensitive receptor.

Relevant Paragraph	Detail	Scheme Compliance
		All measures implemented are representative of Best Practicable Means and will be managed through the **Outline CEMP [EN010168/APP/7.12]** for the construction phase and the **Outline Decommissioning Strategy [EN010168/APP/7.14].** Detailed plans in accordance with the outline plans will be produced and secured by requirements 13 and 20 under Schedule 2 of the **Draft DCO [EN010168/APP/6.1].** During the operation and maintenance phase mitigation includes but is not limited to: • Where practicable, the Scheme layout has been developed to minimise noise and vibration effects at sensitive receptor locations. The BESS Area and 132 kV and 400 kV Substations have been located a minimum of 450 m and 400 m from receptor locations respectively; and • A 2 m bund with additional 3 m barrier around the eastern and southern boundary of the BESS Area has been incorporated within the design of the Scheme to attenuate noise and to reduce visual impacts as shown in **ES Volume 2, Figure 3-3: 400kV Substation and BESS Layout [EN010168/APP/6.2]**. The **Outline OEMP [EN010168/APP/7.13]** commits to noise at sensitive receptors being no higher than the levels presented in Section 14.10 of **ES Volume 1,**

Relevant Paragraph	Detail	Scheme Compliance
		Chapter 14: Noise and Vibration [EN010168/APP/6.1]. A detailed version of the **Outline OEMP [EN010168/APP/7.13]** is secured via Requirement 14 under Schedule 2 of the **Draft DCO [EN010168/APP/3.1].**
Paragraph 5.12.7	The nature and extent of the noise assessment should be proportionate to the likely noise impact.	The nature and extent of the noise assessment provided in **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** is proportionate to the likely noise impact of the Scheme. Section 14.6 of the **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** sets out the assessment methodology used to assess the impact of noise as a result of the Scheme. Following the implementation of embedded and additional mitigation measures, no significant residual effects are anticipated on any noise sensitive receptors.
Paragraph 5.12.8	Applicants should consider the noise impact of ancillary activities associated with the development, such as increased road and rail traffic movements, or other forms of transportation.	**ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** considers the noise impact of ancillary activities associated with the Scheme, including vehicle movements during construction and decommissioning. It concludes that following the implementation of mitigation measures, no significant effects are anticipated at sensitive receptors throughout the construction, operation and maintenance or decommissioning of the Scheme.

Relevant Paragraph	Detail	Scheme Compliance
		As set out in **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** the potential noise and vibration effects arising from vehicle movements during operation and maintenance of the Scheme were scoped out of the assessment, due to low levels of operational traffic.
Paragraph 5.12.9	Operational noise, with respect to human receptors, should be assessed using the principles of the relevant British Standards and other guidance. Further information on assessment of particular noise sources may be contained in the technology specific NPSs. In particular, for renewables (EN-3) and electricity networks (EN-5) there is assessment guidance for specific features of those technologies. For the prediction, assessment and management of construction noise, reference should be made to any relevant British Standards and other guidance which also give examples of mitigation strategies.	The assessment of operational noise impacts in **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** assesses operation noise at identified sensitive receptors in accordance with BS 8233:2014 guidance, BS 4142 guidance and World Health Organisation guidance. Construction and decommissioning noise and vibration impacts have been assessed in line with Annex E of BS 5228-1-2014.
Paragraph 5.12.12	Applicants should submit a detailed impact assessment and mitigation plan as part of any development plan, including the use of noise mitigation and noise abatement technologies during construction and operation.	**ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** provides a detailed impact assessment as part of the Scheme. Mitigation measures embedded into the Scheme design are set out in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** and detailed further in the **Outline CEMP [EN010168/APP/7.12]** and **Outline OEMP [EN010168/APP/7.13],** secured through Requirements in Schedule 2 to the **Draft DCO [EN010168/APP/3.1**]**.**

Relevant Paragraph	Detail	Scheme Compliance
		During construction the **Outline CEMP [EN010168/APP/7.12]** proposes the use of Best Practicable Means to minimise noise and vibration at NSRs, including, neighbouring residential properties and other sensitive receptors arising from construction activities. During operation, the **Outline OEMP [EN010168/APP/7.13]** proposes the use of enclosures, local screening, mufflers, and silencers to be used as appropriate and plant, such as the substation and batteries, will be designed to have minimal tonal, impulsive or intermittent features.
Paragraph 5.12.13	The Secretary of State should consider whether mitigation measures are needed both for operational and construction noise over and above any which may form part of the project application. In doing so the Secretary of State may wish to impose mitigation measures. Any such mitigation measures should take account of the NPPF or any successor to it and the Planning Practice Guidance on Noise.	Mitigation measures embedded into the Scheme design are set out in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** and represent Best Practicable Means (BPM) during construction, operation and decommissioning. These mitigation measures have taken account of the NPPF and the Planning Practice Guidance on Noise.
Paragraph 5.12.14	Mitigation measures may include one or more of the following: • engineering: reducing the noise generated at source and/or containing the noise generated • lay-out: where possible, optimising the distance between the source and noise sensitive receptors and/or incorporating good design to minimise noise transmission through the use of	Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** sets out the embedded mitigation measures embedded in the Scheme design to minimise adverse effects where practicable. These embedded measures represent Best Practicable Means and will be secured within the **Outline CEMP [EN010168/APP/7.12]** for the Construction phase and the **Outline Decommissioning Strategy [EN010168/APP/7.14]**

Relevant Paragraph	Detail	Scheme Compliance
	screening by natural or purpose-built barriers, or other buildings • administrative: using planning conditions/obligations to restrict activities allowed on the site at certain times and/or specifying permissible noise limits/noise levels, differentiating as appropriate between different times of day, such as evenings and late at night, and taking into account seasonality of wildlife in nearby designated sites • insulation: mitigating the impact on areas likely to be affected by noise including through noise insulation when the impact is on a building.	for the Decommissioning phase. These measures will be secured through Requirements in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].**
Paragraph 5.12.15	The project should demonstrate good design through selection of the quietest or most acceptable cost-effective plant available; containment of noise within buildings wherever possible, taking into account any other adverse impacts that such containment might cause (e.g. on landscape and visual impacts; optimisation of plant layout to minimise noise emissions; and, where possible, the use of landscaping, bunds or noise barriers to reduce noise transmission).	Consideration of noise has been considered in the design of the Scheme. As set out in the **Design Approach Document [EN010168/APP/7.3]**, design principle 5 seeks to ensure the Scheme is carefully designed to minimise where practicable impacts on amenity from air quality, traffic and noise effects and safeguard the health and safety of local residents by securing suitable control measures during construction, operation and maintenance and decommissioning of the Scheme. Section 4.1 of the **Design Approach Document [EN010168/APP/7.3]** sets out how the design evolved in relation to minimising noise and vibration effects, which includes locating the BESS and substation a minimum of 450m and 400m from sensitive receptor locations respectively to minimise noise and vibration

Relevant Paragraph	Detail	Scheme Compliance
		effects; the removal of solar panels from field A4 in Lime Down A to provide an increased buffer distance; and sensitively locating infrastructure away from receptors to minimise noise and vibration impacts. The Scheme therefore demonstrates good design through the inclusion of noise and vibration mitigation measures which minimise impacts on amenity from noise effects. **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1],** sets out embedded mitigation measures and additional measures. These include, but are not limited to, screening for works in close proximity to sensitive receptors; programming noisy operations to prevent them occurring simultaneously where possible; and communication with affected occupants. As confirmed in **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]**, following the implementation of these measures there are no residual significant effects in relation to noise are anticipated. Mitigation measures are set out in the **Outline CEMP [EN010168/APP/7.12]** for the Construction phase and the **Outline Decommissioning Strategy [EN010168/APP/7.14]** for the decommissioning phase**.** Detailed plans in accordance with the outline plans will be produced and secured by requirements 13 and 20

Relevant Paragraph	Detail	Scheme Compliance
		under Schedule 2 of the **Draft DCO [EN010168/APP/6.1].**
Paragraph 5.12.16	A development must be undertaken in accordance with statutory requirements for noise. Due regard must be given to the relevant sections of the Noise Policy Statement for England, the NPPF, and the government's associated planning guidance on noise. In Wales the relevant policy will be PPW and the TANs, as well as the Welsh Government's Noise and Soundscape Action Plan	The noise assessment in **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** has given due regard to the relevant sections of the Noise Policy Statement for England, the NPPF, and the government's associated planning guidance on noise.
Paragraph 5.12.17	The Secretary of State should not grant development consent unless they are satisfied that the proposals will meet the following aims, through the effective management and control of noise: • avoid significant adverse impacts on health and quality of life from noise • mitigate and minimise other adverse impacts on health and quality of life from noise • where possible, contribute to improvements to health and quality of life through the effective management and control of noise	**ES, Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]** presents the findings of the assessment of likely significant effects on human health as a result of the Scheme. Noise is scoped into the assessment. **ES, Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]** concludes that during construction, operation and decommissioning of the Scheme, there are no significant effects as a result of the Scheme when the mitigation measures set out in **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** are implemented. Measures embedded into the Scheme design are set out in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** represent Best Practicable Means and include noise abatement measures and locating infrastructure in a sensitive manner with sufficient buffers to sensitive receptors. **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** concludes that following the

Relevant Paragraph	Detail	Scheme Compliance
		implementation of mitigation measures outlined in the **Outline CEMP [EN010168/APP/7.12]**, **Outline OEMP [EN010168/APP/7.13]** and **Outline Decommissioning Strategy [EN010168/APP/7.14]** no significant adverse impacted are anticipated on health and quality of life as a result of noise during any phase of the Scheme. These will be secured through Requirements in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].** Requirement 4 in Schedule 2 of the **Draft DCO [EN010168/APP/3.1]** secures a Community Liaison Group to facilitate liaison between representatives of people living in the vicinity of the Order Limits and other relevant organisations in relation to the construction of the Scheme to keep them up to date with ongoing activities.
Paragraph 5.12.18	When preparing the Development Consent Order, the Secretary of State should consider including measurable requirements or specifying the mitigation measures to be put in place to ensure that noise levels do not exceed any limits specified in the development consent. These requirements or mitigation measures may apply to the construction, operation, and decommissioning of the energy infrastructure development.	**ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** concludes that following the implementation of mitigation measures outlined in the **Outline CEMP [EN010168/APP/7.12]**, **Outline OEMP [EN010168/APP/6.1]** and **Outline Decommissioning Strategy [EN010168/APP/6.1]** no significant adverse impacted are anticipated from noise during any phase of the Scheme. These will be secured through Requirements in Schedule 2 to the **Draft DCO [EN010168/APP/6.1]**. Section 14.6 of **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** sets out the

Relevant Paragraph	Detail	Scheme Compliance
		assessment methodology and states that noise associated with construction and decommissioning phases has been calculated at the assessed receptors using the methodology in BS 5228-1:2014 based on assumptions detailed within Section 14.4 and **ES Volume 3, Appendix 14-4: Noise Modelling [EN010168/APP/6.3]**. The LOAEL and SOAEL levels for Construction and Decommissioning phases are defined in Table 14-3 of the chapter. Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** sets out that construction noise levels that are equal to or exceed the LOAEL represent noise that is present and intrusive. Mitigation measures and noise management plans will be put into place to ensure that construction noise is minimised at all times throughout the construction programme. Measures embedded into the Scheme design are set out in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** represent Best Practicable Means during construction, operation and decommissioning. The **Outline OEMP [EN010168/APP/7.13]** commits to noise at sensitive receptors being no higher than the levels presented in Section 14.10 of **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]**. A detailed version of the **Outline OEMP [EN010168/APP/7.13]** is

Relevant Paragraph	Detail	Scheme Compliance
		secured via Requirement 14 under Schedule 2 of the **Draft DCO [EN010168/APP/3.1].**
Socio-Economic Impacts		
Paragraph 5.13.2	Where the project is likely to have socio-economic impacts at local or regional levels, the applicant should undertake and include in their application an assessment of these impacts as part of the ES (see Section 4.3).	**ES Volume 1, Chapter 16: Socio-economics, Tourism and Recreation [EN010168/APP/6.1]** presents the findings of the assessment of likely significant effects on socio-economics, tourism and recreation as a result of the Scheme in relation to socio-demographic effects, economic effects (employment and GVA), attractions and visitor locations, public rights of way, and recreational venues. It concludes that residual adverse impacts are anticipated in relation to a limited number of PRoW and recreational routes and an equestrian facility. However, adverse impacts have been minimised as far as possible through mitigation including removal of array areas and offsets from PRoW, embedded and additional landscape screening planting and ecological enhancements, and traffic management to control operational movements and HGV routing and numbers. These measures are proposed to be secured through several requirements under Schedule 2 in the **Draft DCO [EN010168/APP/3.1]** with reference to the following documents: • **Design Principles and Parameters [EN010168/APP/7.4]**; • **Outline CEMP [EN010168/APP/7.12];** • **Outline OEMP [EN010168/APP/7.13];**

Relevant Paragraph	Detail	Scheme Compliance
		• **Outline Decommissioning Strategy [EN010168/APP/7.14];** • **Outline Public Rights of Way and Permissive Paths Management Plan [EN010168/APP/7.17]**; • **Outline LEMP [EN010168/APP/7.18]**; and • **Outline CTMP [EN010168/APP/7.22]**. Additionally, as set out in **ES Volume 1, Chapter 16: Residual Effects [EN010168/APP/6.1]**, following the implementation of embedded and additional mitigation measures, no significant residual effects on socio-economics, tourism and recreation are predicted during the operation and maintenance of the Scheme. The Scheme is anticipated to result in some non-significant beneficial effects in relation to employment, increased local training opportunities, and GVA.
Paragraph 5.13.3	The applicant is strongly encouraged to engage with relevant local authorities during early stages of project development so that the applicant can gain a better understanding of local or regional issues and opportunities.	Engagement has been undertaken with Wiltshire Council's Economic and Regeneration Team and Public Rights of Way (PRoW) Officer, as these represent the host authority on socio-economic, tourism and recreation matters. The points of discussion raised are summarised in Table 16-2 in the **ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [EN010168/APP/6.1]**.
Paragraph 5.13.4	The applicant's assessment should consider all relevant socio-economic impacts, which may include:	**ES Volume 1, Chapter 16: Socio-economics, Tourism and Recreation [EN010168/APP/6.1]** presents the findings of the assessment of likely

Relevant Paragraph	Detail	Scheme Compliance
	• 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 • cumulative effects - if development consent were to be granted for a number of projects	significant effects on socio-economics, tourism and recreation as a result of the Scheme in relation to socio-demographic effects, economic effects (employment and GVA), attractions and visitor locations, public rights of way, recreational venues, and cumulative effects. The assessment conclusions are set out below. *Socio economic: socio demographic effects* During construction, the assessment concludes that inbound workers coming to work on the Scheme from other areas can be adequately accommodated by the private accommodation market without substantially increasing competition and therefore no significant adverse effects are anticipated on the local accommodation market. The Scheme is anticipated to create 268 Full Time Equivalent (FTE) per annum with the estimated on-site construction workforce expected to peak at approximately 692 total employees (gross direct employment) during the construction phase. During operation, 15 permanent jobs would be generated. In a peak replacement scenario, 125 FTE are required and in the decommissioning phase up to a gross of 214 FTE employees per annum are estimated. In addition,

Relevant Paragraph	Detail	Scheme Compliance
	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	the Scheme is likely to provide opportunities for construction apprenticeships, which is anticipated to result in a medium-term temporary minor beneficial effect on skills and qualification attainment. Socio demographic effects during the operation and maintenance and decommissioning phases of the Scheme are not predicted to be significant. In addition to the embedded mitigation, enhancement measures are proposed and set out in the **Outline Skills, Supply Chain and Employment Plan [EN010168/APP/7.20]** to enhance local education through promoting apprenticeship and training schemes, to promote local recruitment and procurement, and to support agricultural workers in moving to diversified farming practises (such as sheep grazing) which can continue alongside operation of the Scheme. These are anticipated to result in a beneficial but not significant socio-demographic effect. *Socio economic: economic effects (employment and Gross Value Added (GVA))* In addition to job creation and skills training, the net direct employment generated by the Scheme during

Relevant Paragraph	Detail	Scheme Compliance
		construction, operation and maintenance, and decommissioning combined is anticipated to induce a total uplift in excess of £161 million GVA within 20km of the Scheme (chained to the 2023 value). There is anticipated to be a reduction of up to 20 FTE jobs in the agricultural sector as a result of direct effects on farmers and indirect effects on suppliers. The Scheme's construction is also anticipated to have a negative impact on tourism spending locally, which is estimated could lead to the loss of approximately 50 FTE jobs in the worst-case scenario. Overall, the uplift in employment as a result of the Scheme is assessed as providing a medium term temporary negligible beneficial effect (not significant). The increase in economic performance locally is also deemed to result in medium term negligible beneficial effects (not significant). For the operation and maintenance and decommissioning phases, no significant effects are anticipated. *Tourism and recreation: attractions and visitor locations* During construction, no significant adverse effects are anticipated in relation to nationally and regionally important tourism destinations (such as the CNL),

Relevant Paragraph	Detail	Scheme Compliance
		localised attractions or publicly accessible parks and nature reserves. Once operational, the Scheme is not anticipated to directly impact upon attractions and visitor locations, including the CNL, and proposed mitigation measures to protect its setting including those set out in the **Outline LEMP [EN010168/APP/7.18]** mean that the overall effect is expected to be not significant. *Tourism and recreation: public rights of way and recreational routes* Adverse residual significant effects on certain PRoWs and a long distance recreational routes are anticipated during construction and decommissioning of the Scheme and during peak replacement activities. However, the overall impact of the Scheme on the 120 individual PRoW routes assessed is not anticipated to result in significant effects during these periods, demonstrating that the Scheme is not anticipated to have an overall significant effect on the local and wider PRoW network. During operation (except during replacement activities), overall there are no significant effects anticipated on the use, accessibility and desirability of PRoWs and recreational routes.

Relevant Paragraph	Detail	Scheme Compliance
		Additional mitigation measures are provided in the **Outline PRoW and Permissive Path Management Plan [EN010168/APP/7.17]** and **Outline CTMP [EN010168/APP/7.22]** to reduce the level of effect on PRoW and recreational routes. These will be secured through Requirements in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**. This includes measures targeting driver behaviours and providing banksmen to control sensitive points on HGV routes where there is interaction with PRoW. There are also specific measures for the diversion of footpath WT|GRIT|20 and bridleway WT|MALW|54, where access to Cable Route Corridor works east of Grittleton, and HGV access to Lime Down E are taken respectively. These diversions are proposed to reduce the number of instances in which PRoW users and construction traffic are in conflict, such as crossing points, or using the same route, to ensure PRoW users are not exposed to significant effects on their use of the PRoW or their health and safety. Similar measures will be introduced during replacement activities and during decommissioning. Further, the proposed enhancements to PRoW, including the provision of 12.8 km of new permissive paths as set out in the **Outline PRoW and Permissive**

Relevant Paragraph	Detail	Scheme Compliance
		Paths Management Plan [EN010168/APP/7.17], will enhance connectivity in the local area and will help to improve recreation in the immediate vicinity, secondarily benefitting local population health and wellbeing in the long term. *Tourism and recreation: recreational venues* During construction and decommissioning, there is anticipated to be a medium term temporary moderate adverse significant effect on Grittleton Village Hall and its use for children and youth groups as a result of increased traffic. No other adverse effects on recreational venues are anticipated during construction and decommissioning and overall, with embedded mitigation, the effect on accessibility of recreational facilities for children and youth groups is assessed as not significant. During operation and maintenance, no significant effects are anticipated. As set out in **ES Volume 1, Chapter 16: Socio-economics, Tourism and Recreation [EN010168/APP/6.1]** residual effects remain in relation to five PRoW and permissive routes, the Fosse Way, Long Path, Palladian Way and Wiltshire Way and an equestrian facility, Park Farm, due to cabling works.

Relevant Paragraph	Detail	Scheme Compliance
		However, these effects would occur during construction and would be temporary. **ES Volume 1, Chapter 16: Socio-economics, Tourism and Recreation [EN010168/APP/6.1]** provides a cumulative effects assessment between the Scheme and other proposed committed plans and projects. During construction there is predicted to be minor beneficial effects in relation to the creation of jobs, skills and qualification attainment and economic performance within 20km of the Scheme and neutral impacts are anticipated on the residential population. In relation to tourism and recreation during the construction stage, no effects are predicted on national, regional or local visitor attractions, parks and nature reserves within 2km of the Scheme, (with the exception of Corsham Park which is predicted to experience an adverse effect in the medium term), recreational waterways, recreational aviation, organised sports, youth recreation and play areas and equestrian facilities. Whilst there are no cumulative effects anticipated on long distance recreation routes, adverse effects are predicted on Long Path, Palladian Way and Wiltshire way albeit they are no greater than for the Scheme in isolation. During operation, **ES Volume 1, Chapter 16: Socio-economics, Tourism and Recreation [EN010168/APP/6.1]** predicts there are no cumulative effects, with beneficial effects

Relevant Paragraph	Detail	Scheme Compliance
		predicted for skills and qualification attainment, and local economic performance and prosperity.
Paragraph 5.13.5	Applicants should describe the existing socio-economic conditions in the areas surrounding the proposed development and should also refer to how the development's socio-economic impacts correlate with local planning policies.	**ES Volume 1, Chapter 16: Socio-economics, Tourism and Recreation [EN010168/APP/6.1]** includes a baseline assessment of the conditions of the area.
Paragraph 5.13.6	Socio-economic impacts may be linked to other impacts, for example visual impacts considered in Section 5.10 but may also have an impact on tourism and local businesses. Applicants are encouraged, where possible, to demonstrate that local suppliers have been considered in any supply chain.	**ES Volume 1, Chapter 16: Socio-economics, Tourism and Recreation [EN010168/APP/6.1]** considers the socio-economic impact of the Scheme, including on tourism receptors and local business. Residual adverse impacts are anticipated in relation to tourist attractions, a limited number of PRoWs and recreational routes and an equestrian facility. However, adverse impacts have been minimised as far as possible through mitigation including removal of array areas and offsets from PRoW, embedded and additional landscape screening planting and ecological enhancements, and traffic management to control operational movements and HGV routing and numbers.**ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** also assesses impacts to PRoWs. **ES Volume 1, Chapter 16: Socio-economics, Tourism and Recreation [EN010168/APP/6.1]** recognises that there are likely to be positive impacts upon levels of economic activity, the local labour market, and increased economic prosperity and

Relevant Paragraph	Detail	Scheme Compliance
		income for workers within 20km of the Scheme, including through indirect and induced impacts from increased supply chain activity and increased spending. The **Outline Skills, Supply Chain and Employment Plan [EN010168/APP/7.20]** sets out the proposals to promote apprenticeship and training schemes to enhance local skills and qualification rates and help retrain people in work displaced by the Scheme, and decrease the proportion of workers required to be brought in from further afield. This is intended to enhance local education, skills and attainment during construction and for periods of onsite infrastructure replacement during operation of the Scheme. The **Outline Skills, Supply Chain and Employment Plan [EN010168/APP/7.20]** also provides measures to secure opportunities for re-skilling of employees into new industries, including the energy sector, and include supporting the local agricultural industry in diversified agricultural practices. This will be secured through Requirement 18 under Schedule 2 of the **Draft DCO [EN010168/APP/3.1].**
Paragraph 5.13.7	Applicants should consider developing accommodation strategies where appropriate, especially during construction and decommissioning phases, that would include the need to provide temporary accommodation for construction workers if required.	**ES Volume 1, Chapter 16: Socio-economics, Tourism and Recreation [EN010168/APP/6.1]** sets out an assessment of the Scheme in relation to socio-demographic effects including accommodation and concludes that no significant effects are anticipated on the local private rental accommodation market. A worst-case scenario of a peak 412 inbound employees (generated by gross peak direct

Relevant Paragraph	Detail	Scheme Compliance
		employment from the rest of the UK) requiring temporary accommodation was assessed. Where inbound employees require temporary private rental accommodation, the proposed peak of 412 inbound employees is projected to occupy up to 15.8% of vacant private rental accommodation in the Study Area. This demonstrates that temporary workers can be accommodated in vacant rental stock without substantially increasing competition for private rental properties.
Paragraph 5.13.8	The Secretary of State should consider whether mitigation measures are necessary to mitigate any adverse socio-economic impacts of the development. For example, high quality design can improve the visual and environmental experience for visitors and the local community alike.	The Scheme has been designed, as far as practicable, to avoid and reduce impacts and effects on socio-economics, tourism and recreation through the process of embedding measures into the design. In addition, how the Scheme is constructed, operated and maintained, and decommissioned would be controlled in order to manage and minimise potential environmental effects (required as a result of legislative requirements and/or standard sectoral practices). These measures form part of the assessment of the likely significant effects. The following embedded mitigation measures have been incorporated into the Scheme design with outline proposals and locations to be submitted with the DCO application. These measures are proposed to be secured through requirements under Schedule 2 in the **Draft DCO [EN010168/APP/3.1]** with reference to the following documents:

Relevant Paragraph	Detail	Scheme Compliance
		• **Design Principles and Parameters [EN010168/APP/7.4]**; • **Outline CEMP [EN010168/APP/7.12]**; • **Outline OEMP [EN010168/APP/7.13]**; • **Outline Decommissioning Strategy [EN010168/APP/7.14]**; • **Outline Public Rights of Way and Permissive Paths Management Plan [EN010168/APP/7.17]**; • **Outline LEMP [EN010168/APP/7.18]**; and • **Outline Construction Traffic Management Plan [EN010168/APP/7.22]**. Section 16.10 of **ES Volume 1, Chapter 16: Socio-economics, Tourism and Recreation [EN010168/APP/6.1]** sets out additional mitigation and enhancement measures to mitigate socio-economic impacts of the Scheme including further measures during construction to reduce the effects on ProW including additional signage to enforce construction routes and providing banksmen to control sensitive points on HGV routes.
Paragraph 5.13.9	The Secretary of State should have regard to the potential socio-economic impacts of new energy infrastructure identified by the applicant and from any other sources that the Secretary of State considers to be both relevant and important to its decision.	**ES Volume 1, Chapter 16: Socio-economics, Tourism and Recreation [EN010168/APP/6.1]** considers the socio-economic impact of the Scheme. The Scheme is anticipated to result in some non-significant beneficial effects in relation to employment, increased local training opportunities, and GVA. **ES Volume 1, Chapter 16: Socio Economics, Tourism**

Relevant Paragraph	Detail	Scheme Compliance
		and Recreation [EN010168/APP/6.1] concludes that residual adverse impacts are anticipated in relation to a limited number of PRoW and recreational routes and an equestrian facility. However, adverse impacts have been minimised as far as possible through mitigation including removal of array areas and offsets from PRoW, embedded and additional landscape screening planting and ecological enhancements, and traffic management to control operational movements and HGV routing and numbers. Mitigation measures are set out in the **Outline CTMP [EN010168/APP/7.22]** and the **Outline PRoW and Permissive Path Management Plan [EN010168/APP/7.17],** of which detailed versions will be secured via Requirements under Schedule 2 of the **Draft DCO [EN010168/APP/3.1].**
Paragraph 5.13.10	The Secretary of State may conclude that limited weight is to be given to assertions of socio-economic impacts that are not supported by evidence (particularly in view of the need for energy infrastructure as set out in this NPS).	**ES Volume 1, Chapter 16: Socio-economics, Tourism and Recreation [EN010168/APP/6.1]** presents the findings an assessment of the likely significant effects on socio-economics, tourism and recreation as a result of the Scheme. **ES Volume 1, Chapter 16: Socio-economics, Tourism and Recreation [EN010168/APP/6.1]** and is supported by figures in in **ES Volume 2 [EN010168/APP/6.2]** and appendices in in **ES Volume 3 [EN010168/APP/6.3]** that assist in the identification of measures to address the potential impacts and likely significant effects on socio-economics, tourism and recreation, during the construction, operation and maintenance, and decommissioning phases of the Scheme.

Relevant Paragraph	Detail	Scheme Compliance
		In addition, Section 16.3 of **ES Volume 1, Chapter 16: Socio-economics, Tourism and Recreation [EN010168/APP/6.1]** sets out the applicable legislation, planning policy and other guidance documents relating to socio-economics, tourism and recreation that has been taken into account in the assessment of the Scheme.
Paragraph 5.13.11	The Secretary of State should consider any relevant positive provisions the applicant has made or is proposing to make to mitigate impacts (for example through planning obligations) and any legacy benefits that may arise as well as any options for phasing development in relation to the socio-economic impacts.	The benefits of The Scheme are set out in Section 5 of the **Planning Statement [EN010168/APP/7.2]**. The Scheme provides the following environmental, economic, social and community benefits: • Decarbonisation • Nationally Significant Electricity Generation • Low Cost Electricity • Ecological and Landscape Enhancements • Biodiversity Net Gain • New Permissive Paths • Employment Generation • Economic benefits • Skills training
Paragraph 5.13.12	The Secretary of State may wish to include a requirement that specifies the approval by the local authority of an employment and skills plan detailing arrangements to promote local employment and skills development opportunities, including apprenticeships, education, engagement with local schools and colleges and training programmes to be enacted.	The **Outline Skills, Supply Chain and Employment Plan [EN010168/APP/7.20]** sets out the proposals to promote apprenticeship and training schemes to enhance local skills and qualification rates and help retrain people in work displaced by the Scheme, and decrease the proportion of workers required to be brought in from further afield. This is intended to enhance local education, skills and attainment during

Relevant Paragraph	Detail	Scheme Compliance
		construction and for periods of onsite infrastructure replacement during operation of the Scheme. The **Outline Skills, Supply Chain and Employment Plan [EN010168/APP/7.20]** also provides measures to secure opportunities for re-skilling of employees into new industries, including the energy sector, and include supporting the local agricultural industry in diversified agricultural practices. This will be secured through Requirement 18 under Schedule 2 of the **Draft DCO [EN010168/APP/3.1].**
Traffic and Transport		
Paragraph 5.14.5	If a project is likely to have significant transport implications, the applicant's ES (see Section 4.3) should include a transport appraisal. The DfT's Transport Analysis Guidance (TAG) and Welsh Governments WelTAG provides guidance on modelling and assessing the impacts of transport schemes.	**ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.1]** assesses the impacts of transport on the Scheme. The Applicant has consulted with relevant Highways Authorities regarding the preparation of the Transport Assessment. Details on consultation with National Highways and Wiltshire Council is set out in Table 13-2 of **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]**.
Paragraph 5.14.6	National Highways and Highways Authorities are statutory consultees on NSIP applications including energy infrastructure where it is expected to affect the strategic road network and / or have an impact on the local road network. Applicants should consult with National Highways and Highways Authorities as appropriate on the assessment and mitigation to inform the application to be submitted.	**ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.1]** was prepared following consultation with National Highways and the relevant Highways Authority. Details on consultation with National Highways and Wiltshire Council is set out in Table 13-2 of **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]**.

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 5.14.7	The applicant should prepare a travel plan including demand management and monitoring measures to mitigate transport impacts. The applicant should also provide details of proposed measures to improve access by active, public and shared transport to: • reduce the need for parking associated with the proposal • contribute to decarbonisation of the transport network • improve user travel options by offering genuine modal choice	The Applicant has prepared a travel plan incorporating options to enhance active, public and shared transport provision and accessibility. An Outline Construction Worker Travel Plan (CWTP) has been prepared as part of the **Outline CTMP [EN010168/APP/7.22]** and is secured through a Requirement in the **Draft DCO [EN010168/APP/3.1]**. The **Outline CTMP [EN010168/APP/7.22]** includes measures such as the provision of shuttle buses to transport construction workers to and from the Order Limits. A compound area for contractors will be set up on-site, including appropriate parking spaces. Contractors and visitors will be advised that parking facilities will be provided on-site in advance of visiting the Order Limits and that they should not park on-street.
Paragraph 5.14.8	The assessment should also consider any possible disruption to services and infrastructure (such as road, rail and airports).	The assessment in **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** considers possible impacts to the road network. It concludes that following the implementation of embedded mitigation measures set out in the **Outline CTMP [EN010168/APP/7.22]** and **Outline CEMP [EN010168/APP/7.12]**, there are no significant residual effects on transport and access anticipated, with all effects being temporary and short term during the construction and decommissioning stages. Measures to control vehicles includes signage on the roads, highways works to enable AIL deliveries, and

Relevant Paragraph	Detail	Scheme Compliance
		measures for the provision of transport for construction workers to the Order Limits. Operational mitigation measures are set out in the **Outline OEMP [EN010168/APP/7.13]** and includes the provision of suitable points of access for operational and maintenance phase vehicles with turning areas. The **Outline Decommissioning Strategy [EN010168/APP/7.14]** sets out the decommissioning mitigation measures including implementation of the Decommissioning Traffic Management Plan. The **Outline CTMP [EN010168/APP/7.22]**, **Outline CEMP [EN010168/APP/7.12]**, **Outline OEMP [EN010168/APP/7.13]** and **Outline Decommissioning Strategy [EN010168/APP/7.14]** are secured through Requirements under Schedule 2 of the **Draft DCO [EN010168/APP/3.1].** Following the implementation of these measures there will be no significant impacts from disruption to services and infrastructure.
Paragraph 5.14.9	If additional transport infrastructure is needed or proposed, it should always include good quality walking, wheeling and cycle routes, and associated facilities (changing/storage etc.) needed to enhance active transport provision.	**ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** sets out any additional transport infrastructure proposed by the Scheme. Highway Improvement Areas comprising various sections of existing highway within the administrative areas of Wiltshire Council and South Gloucestershire Council

Relevant Paragraph	Detail	Scheme Compliance
		are included to facilitate access to the Solar PV Sites and Cable Route Corridor with a total area of approximately 12 ha. The Scheme will include the provision of approximately 12.8 km of new permissive paths across each of the Solar PV Sites as shown on the **Works Plan [EN010168/APP/2.3]** as Work No.10. These routes will provide pedestrians and horse riders with improved accessibility to the countryside and improved connectivity to the wider PROW network. The permissive paths will remain open up to 364 days per year throughout the proposed 60-year operational lifetime of the Scheme and be beneficial for local users and visitors through mitigating adverse impacts on other PRoW. The permissive paths will provide alternative access routes and when implemented, will enhance connectivity in the local area.
Paragraph 5.14.11	Where mitigation is needed, possible demand management measures must be considered. This could include identifying opportunities to: • reduce the need to travel by consolidating trips • locate development in areas already accessible by active travel and public transport • provide opportunities for shared mobility • re-mode by shifting travel to a sustainable mode that is more beneficial to the network • retime travel outside of the known peak times • reroute to use parts of the network that are less busy	An Outline CWTP has been prepared as part of the **Outline CTMP [EN010168/APP/7.22]** which sets out how workers will be encouraged to travel to the Site via sustainable travel, where possible. Measure includes the provision of a shuttle bus and a car sharing scheme. Shifts will be organised to avoid construction worker movement between 08:00-09:00 and 17:00-18:00. This also sets out that construction deliveries by HGV will be coordinated to arrive/depart between 09:30-

Relevant Paragraph	Detail	Scheme Compliance
		16:30 where possible to avoid the network peak hours of 08:00-09:00 and 17:00-18:00. Section 13.9 of **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** also sets out the mitigation embedded into the Scheme design. This includes the measures set out in the **Outline CTMP [EN010168/APP/7.22]** which provides a framework for the management of construction vehicle movements to and from the Scheme, to ensure that the effects of the temporary construction phase on the local highway network are minimised. In addition, the Scheme will allow for the provision of 12.8 km of new non-vehicular permissive paths on each of the Solar PV Sites, encouraging a modal shift to more sustainable alternatives and providing pedestrians and horse riders improved accessibility to the countryside and improved connectivity to the wider PROW network.
Paragraph 5.14.12	If feasible and operationally reasonable, such mitigation should be required, before considering requirements for the provision of new inland transport infrastructure to deal with remaining transport impacts. All stages of the project should support and encourage a modal shift of freight from road to more environmentally sustainable alternatives, such as rail, cargo bike, maritime and inland waterways, as well as making appropriate provision for and infrastructure needed to support the	Due to the location of the Scheme, the use of maritime or inland waterways for freight is not possible. However, an Outline CWTP has been prepared as part of the **Outline CTMP [EN010168/APP/7.22]** which provides sustainable travel measures, including the provision of a shuttle bus and a car sharing scheme. Shifts will be organised to avoid construction worker movement between 08:00-09:00 and 17:00-18:00.

Relevant Paragraph	Detail	Scheme Compliance
	use of alternative fuels including charging for electric vehicles.	Section 13.9 of **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** also sets out the mitigation embedded into the Scheme design. The Scheme will allow for the provision of 12.8 km of new non-vehicular permissive paths on each of the Solar PV Sites, encouraging a modal shift to more sustainable alternatives and providing pedestrians and horse riders improved accessibility to the countryside and improved connectivity to the wider PROW network.
Paragraph 5.14.13	Regard should always be given to the needs of freight at all stages in the construction and operation of the development including the need to provide appropriate facilities for HGV drivers as appropriate.	Section 13.9 of **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** sets out that all points of access and internal access tracks have been appropriately designed to accommodate HGV and AIL movements where required. The **Outline CTMP [EN010168/APP/7.22]** provides a framework for the management of construction vehicle movements to and from the Scheme, to ensure that the effects of the temporary construction phase on the local highway network are minimised. The **Outline CTMP [EN010168/APP/7.22]** includes measures for HGV drivers, including construction routes and a booking system for deliveries. As explained in **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]**, highway improvements are required to facilitate construction. Works within the 'Highway Improvement Areas' comprise modifications to the existing highway such as improvements to road

Relevant Paragraph	Detail	Scheme Compliance
		edge where it is deteriorated, minor works to enable construction vehicle movements such as provision of passing places within the existing highway boundary, traffic management measures and provision of visibility splays. The 'Highway Improvement Areas will also include measures to safely accommodate AIL vehicle movements along construction routes,
Paragraph 5.14.14	The Secretary of State may attach requirements to a consent where there is likely to be substantial HGV traffic that: • control numbers of HGV movements to and from the site in a specified period during its construction and possibly on the routing of such movements • make sufficient provision for HGV parking, and associated high quality drive facilities either on the site or at dedicated facilities elsewhere, to support driver welfare, avoid 'overspill' parking on public roads, prolonged queuing on approach roads and uncontrolled on-street HGV parking in normal operating conditions • ensure satisfactory arrangements for reasonably foreseeable abnormal disruption, in consultation with network providers and the responsible police force.	As set out in **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** it is considered that 74 HGV arrivals (148 movements) represents a reasonable worst-case assumption for the number of peak daily HGV movements associated with the construction of the Solar PV Sites. As set out in the **Outline CTMP [EN010168/APP/7.22]** deliveries by HGV will be coordinated through a booking system to avoid travel during the network peak hours where possible. Therefore, deliveries will be scheduled for between 09:30 and 16:30 where possible. Some deliveries may be required outside of these hours, if unavoidable. In terms of parking, the **Outline CTMP [EN010168/APP/7.22]** sets out that advisory signs will be in place informing contractors and visitors that parking is not permitted on-street in the vicinity of the Site or on the Site access road. Contractors and visitors will be advised that parking facilities will be provided on-Site in advance of visiting the Site and that they should not park on-street.

Relevant Paragraph	Detail	Scheme Compliance
		As set out in the **Outline CEMP [EN010168/APP/7.12]**, the management of abnormal load movements will be agreed with the local highway authority and the police prior to delivery.
Paragraph 5.14.15	The Secretary of State should have regard to the cost-effectiveness of demand management measures compared to new transport infrastructure, as well as the aim to secure more sustainable patterns of transport development when considering mitigation measures.	An Outline CWTP has been prepared as part of the **Outline CTMP [EN010168/APP/7.22]** which sets out how workers will be encouraged to travel to the Order Limits via sustainable travel, where possible. Measure includes the provision of a shuttle bus and a car sharing scheme. Shifts will be organised to avoid construction worker movement between 08:00-09:00 and 17:00-18:00. Section 13.9 of **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** also sets out the mitigation embedded into the Scheme design. The Scheme will allow for the provision of 12.8 km of new non-vehicular permissive paths on each of the Solar PV Sites, encouraging a modal shift to more sustainable alternatives and providing pedestrians and horse riders improved accessibility to the countryside and improved connectivity to the wider PROW network.
Paragraph 5.14.18	A new energy NSIP may give rise to substantial impacts on the surrounding transport infrastructure and the Secretary of State should therefore ensure that the applicant has sought to mitigate these impacts, including during the construction phase of the development and by enhancing active, public and shared transport provision and accessibility.	A number of embedded mitigation measures are set out within the **Outline CTMP [EN010168/APP/7.22]** for the control of vehicles associated with the construction phase. This includes the following: • Signs to direct construction vehicles associated with the Scheme will be installed along the agreed construction traffic route. Delivery

Relevant Paragraph	Detail	Scheme Compliance
		drivers, contractors and visitors will be provided with a route plan in advance of delivering to the Order Limits to ensure that vehicles follow the identified route; • Advisory signs informing contractors and visitors that parking will not permitted on-street in the vicinity of the Order Limits or on access roads; • All signage on the designated route will be inspected twice daily by the Site Manager, to ensure they are kept in a well maintained condition and located in safe and appropriate locations; • A compound area for contractors will be set up on-site, including appropriate parking spaces. Contractors and visitors will be advised that parking facilities will be provided on-site in advance of visiting the Order Limits and that they should not park on-street; • A wheel wash facility will be provided ahead of exiting the Order Limits allowing vehicles to be hosed down so that no construction vehicles will take mud or debris onto the local highway network; • A road sweeper will be provided for surrounding local roads along the designated route to alleviate any residual debris generated during the construction phase, as required; • The Order limits will be secured at all times with Heras fencing;

Relevant Paragraph	Detail	Scheme Compliance
		• A requirement for engines to be switched off on-site when not in use; • Spraying of areas with water supplied as and when conditions dictate to prevent the spread of dust; • Vehicles carrying waste material off-site to be sheeted; • Banksmen will be provided at Site access junctions where required to indicate to construction traffic when it is safe for them to enter and exit the Order Limits; • All residents in the vicinity of the Order Limits along the designated route will be provided with contact details of the Community Liaison Manager, which will also be provided on a site-board at access and egress junctions; • Agreement to a Road Condition/Dilapidation Survey with the local highway authority; and • Works to enable AIL deliveries During the operation and maintenance phase, there will be an ongoing replacement of defective panels and breakages etc. This is expected to be on an ad-hoc basis and will result in a non-material level of HGV trips on a day-to-day basis. The **Outline CTMP [EN010168/APP/7.22]** is secured under Requirement 15 in Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**.

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 5.14.20	Development consent should not be withheld provided that the applicant is willing to enter into planning obligations for funding new infrastructure or requirements can be imposed to mitigate transport impacts. In this situation the Secretary of State should apply appropriately limited weight to residual effects on the surrounding transport infrastructure.	**ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** concludes all effects will be temporary and short term and overall, there will be no significant residual effects on Transport and Access.
Paragraph 5.14.21	The Secretary of State should only consider refusing development on highways grounds if there would be an unacceptable impact on highway safety, residual cumulative impacts on the road network would be severe, or it does not show how consideration has been given to the provision of adequate active public or shared transport access and provision.	**ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** outlines how all effects during the construction and decommissioning phases will be temporary and short term and overall, there will be no significant residual or cumulative effects and residual and cumulative effects for the operation and maintenance phases will be negligible and not significant.
Resource and Waste Management		
Paragraph 5.15.6	Applicants must demonstrate that development proposals are in line with Defra's policy position on the role of energy from waste in treating residual waste.	The Scheme has been designed and will be constructed and operated 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 Scheme during its use. **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** presents the findings of the assessment of likely effects of the Scheme on materials and waste for the construction, operation and maintenance and decommissioning phases. Within this

Relevant Paragraph	Detail	Scheme Compliance
		assessment the Defra Guidance on Applying the Waste Hierarchy was used.
Paragraph 5.15.8	The applicant should set out the arrangements that are proposed for managing any waste produced and prepare a report that sets out the sustainable management of waste and use of resources throughout any relevant demolition, excavation and construction activities.	The Scheme has been designed and will be constructed and operated 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 Scheme during its use. The assessment set out in **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** concludes that no residual significant effects are identified for materials and waste. To minimise waste, **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** and the **Outline SWMP [EN010168/APP/7.16]** confirm that suitable excavated materials will be reused on-site, as determined through a post-consent Materials Management Plan, prepared in line with the CL:AIRE Definition of Waste Code of Practice or relevant permitting. The **Outline SWMP [EN010168/APP/7.16]** is secured under Requirement 19 in Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**.
Paragraph 5.15.9	The arrangements described and a report setting out the sustainable management of waste and use of resources should include information on how re-use and recycling will be maximised in addition to the proposed waste recovery and disposal system for all waste generated by the development. They should also include an assessment of the impact of the waste	ES Volume 1, **Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** and the **Outline SWMP [EN010168/APP/7.16]** have been prepared, prioritising re-use and recycling over disposal.

Relevant Paragraph	Detail	Scheme Compliance
	arising from development on the capacity of waste management facilities to deal with other waste arising in the area for at least five years of operation.	The Scheme has been designed and will be constructed and operated 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 Scheme during its use. To minimise waste, **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** and the **Outline SWMP [EN010168/APP/7.16]** confirm that suitable excavated materials will be reused on-site, as determined through a post-consent Materials Management Plan, prepared in line with the CL:AIRE Definition of Waste Code of Practice or relevant permitting. As set out in the **Outline SWMP [EN010168/APP/7.16]** the detailed design stage of the Scheme will determine the quantity and types of materials used, the quantity and types of waste arising, and the management of materials and waste. This will include the principles of Designing out Waste, as below: • Design for Reuse and Recovery; • Design for Off Site Construction; • Design for Materials Optimisation; • Design for Waste Efficient Procurement; and • Design for Deconstruction and Flexibility.

Relevant Paragraph	Detail	Scheme Compliance
		In general, the following measures will be implemented during the design and construction phases of the Scheme, where technically, economically and environmentally practicable: • Manage waste in accordance with the waste hierarchy; • Design out and prevent waste arising; • Reuse excavated materials within the Scheme; • Divert waste from landfill through off-site recycling and recovery; and • Use recycled and secondary aggregates (alternative materials) in the construction of the Scheme. **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** provides that with embedded mitigation measures in place, the quantities of waste to be disposed of to landfill are anticipated to be below 1% of regional inert and non-hazardous landfill capacity and less than 0.1% of national hazardous landfill capacity. Therefore, the magnitude of impact is negligible and not significant.
Paragraph 5.15.10	The applicant is encouraged to refer to the Waste Prevention Programme for England: Maximising Resources Minimising Waste and 'Towards Zero Waste: Our Waste Strategy for Wales' and should seek to minimise the volume of waste produced and the volume of waste sent for disposal unless it can be demonstrated that this is the best overall environmental outcome.	As set out in Section 20.4 Materials and Waste of **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]**, national policy relevant to the Scheme and materials and waste assessment includes the 'Waste Prevention Programme for England: Maximising Resources Minimising Waste'. **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** sets out measures

Relevant Paragraph	Detail	Scheme Compliance
		embedded into the design and layout of the Scheme to reduce the impact on waste. This includes that during the construction phase, the Scheme will follow DEFRA's Waste Hierarchy guidance, which aims to prioritise waste prevention, followed by preparing for reuse, recycling, other recovery and as a last resort, disposal.
Paragraph 5.15.12	The UK is committed to moving towards a more 'circular economy'. Where possible, applicants are encouraged to source materials from recycled or reused sources and use low carbon materials, sustainable sources and local suppliers. Construction best practices should be used to ensure that material is reused or recycled onsite where possible.	The **Outline CEMP [EN010168/APP/7.12]** and **Outline SWMP [EN010168/APP/7.16]** set out: • the waste streams that will be generated; • how the waste hierarchy will be applied to these wastes; • good practice measures for managing waste; and • roles and responsibilities for waste management. With the incorporation of mitigation measures, **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** concludes that no significant effects in relation to waste have been identified in relation to the Scheme. The following mitigation measures will be implemented during the design and construction phases of the Scheme, where technically, economically and environmentally practicable: • manage waste in accordance with the waste hierarchy; • design out and prevent waste arising;

Relevant Paragraph	Detail	Scheme Compliance
		• reuse excavated materials within the Scheme; • divert waste from landfill through off-site recycling and recovery; and • use recycled and secondary aggregates (alternative materials) in the construction of the Scheme.
Paragraph 5.15.13	Applicants are also encouraged to use construction best practices in relation to storing materials in an adequate and protected place on site to prevent waste, for example, from damage or vandalism. The use of Building Information Management tools (or similar) to record the materials used in construction can help to reduce waste in future decommissioning of facilities, by identifying materials that can be recycled or reused.	The Scheme will aim to prioritise waste prevention, followed by preparing for reuse, recycling and recovery and lastly disposal to landfill as per the waste hierarchy. The construction of the Scheme will be controlled by the measures defined within the **Outline SWMP [EN010168/APP/7.16]**. As set out in the **Outline CEMP [EN010168/APP/7.12]**, secured through Requirement 13 under Schedule 2 of the **Draft DCO [EN010168/APP/3.1],** any storage of materials will be kept secure to prevent theft or vandalism. A safe system for accessing the materials storage areas would be implemented by the contractor(s). All hazardous materials including fuels, chemicals, cleaning agents, solvents and solvent containing products to be properly sealed in containers at the end of each day prior to storage in appropriately protected and bunded storage areas. During decommissioning, the Scheme will be subject to measures and procedures defined within an **Outline**

Relevant Paragraph	Detail	Scheme Compliance
		Decommissioning Strategy [EN010168/APP/7.14] as secured through Requirement 20 under Schedule 2 of the **Draft DCO [EN010168/APP/3.1]** i The **Outline Decommissioning Strategy [EN010168/APP/7.14]** contains measures to manage waste including (but are not limited to): • The contractor will consider the objectives of sustainable resource and waste management and seek to use material resources efficiently, reduce waste at source, reduce waste that requires final disposal to landfill and apply the principles of the waste hierarchy. This would include, where reasonably practical, segregation of decommissioning materials on-site for appropriate re-use, recycling and recovery with landfill as a last resort. • All waste management will be undertaken in accordance with the relevant and waste would be transported by licensed waste hauliers to waste management sites which hold the necessary regulatory authorisation and/or permits for those wastes consigned to them.
Paragraph 5.15.14	The Secretary of State should consider the extent to which the applicant has proposed an effective system for managing hazardous and non-hazardous waste arising from the construction, operation and decommissioning of the proposed development.	The **Outline SWMP [EN010168/APP/7.16]** sets out measures for the management of waste during construction including both non-hazardous and hazardous waste taking account of the waste hierarchy. During operation, the **Outline OEMP [EN010168/APP/7.13]** sets out measures for the

Relevant Paragraph	Detail	Scheme Compliance
		management of waste stating that the Scheme will prioritise waster prevention, followed by allowing for reuse, recycling, and recovery of equipment when it comes to replacement as part of landfill disposal as the last resort, incline with the waste hierarchy. Furthermore, the **Outline OEMP [EN010168/APP/7.13]** sets out that a Waste Management Strategy will be developed in order to suitably manage operational waste. During decommissioning, the **Outline Decommissioning Strategy [EN010168/APP/7.14]** sets out that the principles of the waste hierarchy will be adopted and include, where reasonably practical, segregation of decommissioning materials on-site for appropriate re-use, recycling and recovery with landfill as a last resort. The **Outline Decommissioning Strategy [EN010168/APP/7.14]** also sets out that a detailed Site Waste Management Plan will be prepared before commencement of decommissioning and will be implemented by the contractor, once appointed. The **Outline SWMP [EN010168/APP/7.16], Outline OEMP [EN010168/APP/7.13]** and **Outline Decommissioning Strategy [EN010168/APP/7.14]** are secured under Requirements in Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**.
Paragraph 5.15.15	The Secretary of State should be satisfied that: • any such waste will be properly managed, both on-site and off-site.	The Scheme has been designed and will be constructed and operated to minimise the creation of waste, maximise the use of recycled materials and

Relevant Paragraph	Detail	Scheme Compliance
	• the waste from the proposed facility can be dealt with appropriately by the waste infrastructure which is, or is likely to be, available. Such waste arisings should not have an adverse effect on the capacity of existing waste management facilities to deal with other waste arisings in the area. • adequate steps have been taken to minimise the volume of waste arisings, and of the volume of waste arisings sent for recovery or disposal, except where that is the best overall environmental outcome.	assist the collection, separation, sorting, recycling and recovery of waste arising from the Scheme during its use. To manage waste during the construction, operation and decommissioning stages, measures are set out in the **Outline SWMP [EN010168/APP/7.16], Outline OEMP [EN010168/APP/7.13]** and **Outline Decommissioning Strategy [EN010168/APP/7.14]** which are secured under Requirements in Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**. The approach is to ensure that opportunities are sought for waste minimisation, reuse, recycling and recovery in line with the requirements of the waste hierarchy. **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** concludes that for construction, operation and maintenance and decommissioning, the quantities of waste will have a negligible impacts on capacity. The **Outline SWMP [EN010168/APP/7.16]** sets out the process for managing waste carriers and facilities, including the recording of details of the proposed waste carrier for each waste stream and the need to ensure that that all movements of non-hazardous waste, including inert waste, from site are accompanied by a Waste Transfer Note. During operation and maintenance and decommissioning **ES Volume 1, Chapter 20: Other Environmental**

Relevant Paragraph	Detail	Scheme Compliance
		Matters [EN010168/APP/6.1] sets out that it is likely that the solar PV panels and battery waste generated by the Scheme, would be managed by specialist regional or national facilities; these facilities would be developed over the operation and maintenance phase of the Scheme in response to demand generated by the UK-wide solar energy industry. The capacity of such facilities is not expected to be influenced by other non-solar farm projects in the surrounding area; this is because the facilities will only be managing specific solar PV panel waste. In addition it is also recognised that private sector waste companies will develop facilities to respond to market demands.
Paragraph 5.15.16	Where necessary, the Secretary of State should use requirements or obligations to ensure that appropriate measures for waste management are applied.	The SoS can be satisfied that the Applicant has conducted a robust assessment and consequently provided appropriate measures for waste management. **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** sets out measures embedded into the design and layout of the Scheme to reduce the impact on waste. During the construction phase, the Scheme will follow DEFRA's Waste Hierarchy guidance, which aims to prioritise waste prevention, followed by preparing for reuse, recycling, other recovery and as a last resort, disposal. An **Outline CEMP [EN010168/APP/7.12]** and **Outline SWMP [EN010168/APP/7.16]** are included alongside the ES which set out: • the waste streams that will be generated;

Relevant Paragraph	Detail	Scheme Compliance
		• how the waste hierarchy will be applied to these wastes; • good practice measures for managing waste; and • roles and responsibilities for waste management. With the incorporation of mitigation measures, no waste significant effects have been identified in relation to the Scheme. During decommissioning, the Scheme will be subject to waste measures and procedures defined within an **Outline Decommissioning Strategy [EN010168/APP/7.14]** as secured through the DCO. This includes measures to minimise impacts of waste on the surrounding environment though measures such as: • damping down of surfaces during spells of dry weather and brushing/water spraying of heavily used hard surfaces/access points across the site as required; • burning of waste or unwanted materials will not be permitted on-site; • all hazardous materials including fuels, chemicals, cleaning agents, solvents and solvent containing products to be properly sealed in containers at the end of each day prior to storage in appropriately protected and bunded storage areas; and

Relevant Paragraph	Detail	Scheme Compliance
		• all decommissioning workers will be required to use appropriate personal protective equipment whilst performing activities on-site. The assessment in **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** concludes that no residual significant effects are identified for materials and waste.
Paragraph 5.15.19	The Secretary of State should have regard to any potential impacts on the achievement of resource efficiency and waste reduction targets set under the Environment Act 2021 or wider goals set out in the government's Environmental Improvement Plan 2023.	The Scheme is fully aligned with the principles of resource efficiency and waste reduction outlined in the Environment Act 2021 and the Environmental Improvement Plan 2023. Measures have been integrated to minimise construction waste, promote reuse and recycling, and ensure efficient use of materials throughout the Scheme lifecycle. An **Outline SWMP [EN010168/APP/7.16]** and **Outline CEMP [EN010168/APP/7.12]** will be implemented to track and manage waste, ensuring best practices. Design choices prioritise sustainable materials and low-impact construction methods. These commitments support the achievement of national targets and contribute positively to broader environmental goals, demonstrating responsible and sustainable development and will be. This will be secured through Requirements under Schedule 2 of the **Draft DCO [EN010168/APP/3.1].**
Water Quality and Resources		
Paragraph 5.16.3	Where the project is likely to have effects on the water environment, the applicant should undertake an assessment of the existing status of, and impacts of the	**ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [ES010168/APP/6.1]** provides a baseline assessment on the existing environment and

Relevant Paragraph	Detail	Scheme Compliance
	proposed project on, water quality, water resources and physical characteristics of the water environment, and how this might change due to the impact of climate change on rainfall patterns and consequently water availability across the water environment, as part of the ES or equivalent (see Section 4.3 and 4.10).	reports on the appraisal of likely effects on the water environment as a result of the Scheme. The Applicant has assessed the likely significant effects of the Scheme on water quality and resources to ensure its compliance with the relevant pollution control regime. **Chapter 11: Hydrology, Flood Risk and Drainage [ES010168/APP/6.1]** concludes that, with embedded mitigation and additional mitigation measures and the measures described in the **Outline CEMP [EN010168/APP/7.12]** and **Outline Decommissioning Strategy [EN010168/APP/7.14]**, no significant residual effects are anticipated during the construction, operation and maintenance and decommissioning phases of the Scheme. These measures are secured through requirements 13 and 20 under Schedule 2 of the **Draft DCO [EN010168/APP/3.1].** The **Outline Water Resources Strategy [EN010168/APP/7.25]** provides an early-stage evaluation of quantities of water required for the Scheme during the construction and operation and maintenance phases, and where the Applicant is likely to resource these demands. The **Outline Water Resources Strategy [EN010168/APP/7.25]** sets out that Bristol Water has confirmed that they are able to provide a water connection sufficient for the Scheme during its construction phase.

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 5.16.4	The applicant should make early contact with the relevant regulators, including the local authority, the Environment Agency and Marine Management Organisation, where appropriate, for relevant licensing and environmental permitting requirements.	Table 11-2 of **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** sets out details of the engagement undertaken by the Applicant, including with the Environment Agency and relevant local authority. Statutory consultation was also held between 29 January 2025 and 19 March 2025. A full list of consultation responses in relation to Hydrology, Flood Risk and Drainage are presented in the **Consultation Report [EN010168/APP/5.1]** submitted as part of the Application.
Paragraph 5.16.5	Where possible, applicants are encouraged to manage surface water during construction by treating surface water runoff from exposed topsoil prior to discharging and to limit the discharge of suspended solids e.g. from car parks or other areas of hard standing, during operation.	**ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** assesses likely significant effects on hydrology, flood risk and drainage as a result of the Scheme, with the term 'hydrology' including risks associated with surface water and drainage. The assessment considers all stages of the Scheme, including construction. **ES Volume 3, Appendices 11-1 – 11-9: FRA and Drainage Strategy [EN010168/APP/6.3]** outlines measures to manage surface water, prevent increased flood risk, and ensure proper drainage through sustainable systems, including SuDS. Through the incorporation of SuDS and understanding the Solar PV Sites' and Cable Route Corridor hydrological conditions, the strategy helps manage water runoff,

Relevant Paragraph	Detail	Scheme Compliance
		protect water quality, and minimise the environmental impact on local infrastructure. Following the implementation of embedded mitigation measures set out within Section 11.9 of **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**, the assessment concludes that there are no significant residual effects. The mitigation measures in relation to drainage and surface water management are set out in Section 11.9 of **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** include, but are not limited to: • Eight metre buffers from infrastructure will be established around watercourses, including Main Rivers and Ordinary Watercourses. This is an improvement over the baseline scenario, where arable farming typically involves ploughing closer to ditches than the proposed separations, resulting in better drainage outcomes; • Linear infiltration trenches will be incorporated around isolated infrastructure (e.g. conversion or cable jointing pillars) within panelled areas to manage surface water at source, mimic the undeveloped state, and prevent lateral surface water migration; and • Where practicable, runoff from equipment and access tracks will be directed to permeable

Relevant Paragraph	Detail	Scheme Compliance
		SuDS features such as gravel-filled trenches or French drains, or similar passive drainage features appropriate to local conditions; The accompanying management plans include the **Outline CEMP [EN010168/APP/7.12]** and **Outline OEMP [EN010168/APP/7.13]** which are secured via requirements 13 and 14 under Schedule 2 of the **Draft DCO [EN010168/APP/3.1].**
Paragraph 5.16.6	Applicants are encouraged to consider protective measures to control the risk of pollution to groundwater beyond those outlined in River Basin Management Plans and Groundwater Protection Zones – this could include, for example, the use of protective barriers.	**ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** assesses likely significant effects on hydrology, flood risk and drainage as a result of the Scheme, including detailed assessment of groundwater quality and flood risk. The assessment considers all stages of the Scheme and concludes that all residual effects are considered to be of negligible significance and not significant in EIA terms. Section 11.8 of **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** provides assessment of the potential impacts, with Table 11-7: Summary of Potential Water Resources Impacts of the chapter, capturing all potential impacts on the water environment, including potential groundwater contamination.

Relevant Paragraph	Detail	Scheme Compliance
		Embedded mitigation measures are set out in Section 11.9 of **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**. The assessment of likely effects and impacts is detailed in Section 11.10 of **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1],** and confirms that taking embedded mitigation into account, the magnitude of impact on surface and groundwater quality is low. This section further confirms with the embedded mitigation measures the magnitude of impact on the Drinking Water Groundwater Safeguard Zone within the central part of the BESS area is assessed to be negligible. Embedded mitigation measures set out in Section 11.9 of **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** in relation to water quality and pollution control include but are not limited to: • The **Outline CEMP [EN010168/APP/7.12]** sets out water management measures to control surface water run-off and drain hardstanding and other structures during the construction, operation and decommissioning of the Scheme; • A Water Management Plan (which will form part of a detailed CEMP) which will include details of pre-construction, construction, and post-construction water quality monitoring. This will be based on a combination of visual observations and reviews of the Environment

Relevant Paragraph	Detail	Scheme Compliance
		Agency's automatic water quality monitoring network; and • Where trenchless crossing techniques such as HDD are used, appropriate environmental controls will be implemented to manage the risk of drilling fluid escape. This includes procedures to detect and respond to potential breakouts. These measures will be secured through the detailed CEMP, based on the commitments set out in the **Outline CEMP [EN010168/APP/7.12].** Detailed versions of the **Outline CEMP [EN010168/APP/7.12]** and **Outline OEMP [EN010168/APP/7.13]** will be secured via requirements 13 and 14 under Schedule 2 of the **Draft DCO [EN010168/APP/3.1].**
Paragraph 5.16.7	The ES should in particular describe: • the existing quality of waters affected by the proposed project and the impacts of the proposed project on water quality, noting any relevant existing discharges, proposed new discharges and proposed changes to discharges • existing water resources affected by the proposed project and the impacts of the proposed project on water resources, noting any relevant existing abstraction rates, proposed new abstraction rates and proposed changes to abstraction rates (including any impact on or use of mains supplies and reference to Abstraction	An assessment of the baseline is provided in Section 10.6 of **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**. A **Water Framework Directive (WFD) Assessment [EN010168/APP/7.11]** has been undertaken and concludes that, with the embedded and additional mitigation measures proposed, all identified effects on WFD designated waterbodies have been reduced to levels assessed as negligible or minor adverse. No residual effects are considered likely to result in deterioration of waterbody status or to prevent the achievement of relevant environmental objectives set

Relevant Paragraph	Detail	Scheme Compliance
	Licensing Strategies) and also demonstrate how proposals minimise the use of water resources and water consumption in the first instance • existing physical characteristics of the water environment (including quantity and dynamics of flow) affected by the proposed project and any impact of physical modifications to these characteristics • any impacts of the proposed project on water bodies or protected areas (including shellfish protected areas) under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 and source protection zones (SPZs) around potable groundwater abstractions • how climate change could impact any of the above in the future • any cumulative effects	out in the Severn River Basin Management Plan. On that basis, the Scheme is compliant with the objectives of the WFD. The potential impacts of climate change have been incorporated into the assessments set out in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1].** The impacts of climate change and cumulative effects are considered in **Chapter 21: Cumulative Effects and In-combination Effects [EN010168/APP/6.1]**.
Paragraph 5.16.8	The Secretary of State should consider whether mitigation measures are needed over and above any which may form part of the project application. A construction management plan may help codify mitigation at that stage.	Mitigation measures during the construction phase of the Scheme will be implemented through the **Outline CEMP [EN010168/APP/7.12].** **Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** sets out the measures proposed to mitigate adverse effects on the water environment for example drainage and surface water management measures such as 8 m buffers from infrastructure established around watercourses and runoff directed to permeable SuDS features. Water quality and pollution control measures are also proposed including a Water

Relevant Paragraph	Detail	Scheme Compliance
		Management Plan to include details of water quality monitoring. Measures to prevent silt-laden runoff and spillages of leakages and pollutants are also set out in the **Outline CEMP [EN010168/APP/7.12]** which will be secured through Requirement 13 under Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**.
Paragraph 5.16.16	The Secretary of State should consider proposals to mitigate adverse effects on the water environment and any enhancement measures put forward by the applicant and whether appropriate requirements should be attached to any development consent and/or planning obligations are necessary.	Mitigation measures during the construction phase of the Scheme will be implemented through the **Outline CEMP [EN010168/APP/7.12].** Section 11.9 of **Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** sets out embedded mitigation measures proposed to mitigate adverse effects on the water environment. This includes drainage and surface water management measures such as 8 m buffers from infrastructure established around watercourses and runoff directed to permeable SuDS features. Water quality and pollution control measures are also proposed including a Water Management Plan to include details of water quality monitoring. These measures are included in the **Outline CEMP [EN010168/APP/7.12]**, **Outline OEMP [EN010168/APP/7.13]**, **Outline LEMP**; **[EN010168/APP/7.18], Outline Decommissioning Strategy [EN010168/APP/7.14]**, and **Outline Soil Resources Management Plan [EN010168/APP/7.15]**. Detailed versions of these plans will be secured via requirements 13,14, 7, 20, and 17 under Schedule 2 of the **Draft DCO [EN010168/APP/3.1].**

Relevant Paragraph	Detail	Scheme Compliance
		Following the implementation of the embedded mitigation measures described in Section 11.9 of **Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**, the assessment concludes that all residual effects are considered to be of negligible significance and not significant in EIA terms.

NPS EN-3 for Renewable Energy

Relevant Paragraph	Detail	Scheme Compliance
Introduction		
Paragraph 1.1.2	Electricity generation from renewable sources is an essential element of the transition to net zero and meeting our statutory targets for the sixth carbon budget (CB6). Our analysis suggests that demand for electricity is likely to increase significantly over the coming years and could more than double by 2050. This could require a fourfold increase in low carbon electricity generation, with most of this likely to come from renewables.	The **Statement of Need [EN010168/APP/7.1]** explains that the Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure, and low carbon electricity, helping contribute to the UK achieving its Sixth Carbon Budget commitments and stay on track to achieve net zero by 2050. **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** sets out that the Scheme could provide enough electricity to power around 144,000 homes per year if tracker panels are utilised and 148,000 homes per year for fixed panels. This represents a significant contribution towards delivery of the government's energy objectives and target of net zero by 2050. The total energy generated by the Scheme would be around 23.54TWh and 24.26TWh over the 60-year Scheme lifespan for tracked and fixed panels respectively. The **Statement of Need [EN010168/APP/7.1]** sets out that the Scheme is a leading GB large-scale solar plus storage scheme. If consented, it would be an essential component of the UK's plan to deliver a future of efficient decarbonisation through the deployment of large-scale, technologically and geographically diverse low carbon generation schemes and would also deliver

Relevant Paragraph	Detail	Scheme Compliance
		flexibility to the UK electricity market, contributing to lowering bills for consumers through its operational life. The meaningful and timely contributions offered by the Scheme to UK decarbonisation and security of supply, will be critical on the path to net zero beyond delivery of the government's 'Clean Power by 2030' mission. Without the Scheme, a significant and vital opportunity to develop a large-scale low carbon generation scheme will have been passed over, increasing materially the risk that future Carbon Budgets and the net zero 2050 target will not be achieved.
Climate Change Adaptation and Resilience		
Paragraph 2.4.11	Solar photovoltaic (PV) sites may also be proposed in low lying exposed sites. For these proposals, applicants should consider, in particular, how plant will be resilient to: • increased risk of flooding; and • impact of higher temperatures.	**Environmental Statement (ES) Volume 3, Appendix 4-1: Site Selection Assessment Report (SSAR) [EN010168/APP/6.3]** sets out the six-stage approach used by the Applicant to identify the proposed location for the Scheme and evaluate the proposed location against other potential areas for solar development. It identifies potential development areas for the Scheme and presents how each of those areas perform against a range of planning, environmental and operational constraints and opportunities. In terms of embedded mitigation, **ES Volume 1, Chapter 7: Climate Change** sets out that the Scheme has been designed, as far as practicable, to avoid and reduce impacts and effects on Climate Change and to increase Climate Change resilience through the process embedding measures into the design. In addition, how the Scheme is constructed, operated and maintained, and decommissioned would be controlled

Relevant Paragraph	Detail	Scheme Compliance
		through measures secured in the DCO in order to manage and minimise potential environmental effects (required as a result of legislative requirements and/or standard sectoral practices). **ES Volume 1, Chapter 7: Climate Change** sets out mitigation measures embedded into the design of the Scheme during construction, operation (including maintenance) and decommissioning to account for future flood risk. This includes (but is not limited to): • Associated electrical infrastructure, including substations and conversion units, will be sequentially located to areas with a 'low' probability of flooding where practicable; • Less-flood sensitive infrastructure forming the wider Scheme (Solar PV Panels and cabling) will be sequentially located outside the 1 in 100 plus climate change annual probability extent (1% +CC) or where this is not practicable restricted to areas which would experience less than 1m depth of flooding during the same event; • For both fixed and tracker panels, all sensitive and electrical equipment on the Solar PV Panel will be elevated by the legs (including the solar panel face itself) so that it is no less than 0.6 metres above the surrounding peak flood level; and • Tracker panel units will be mounted on raised frames (raised a minimum of 0.4 metres when

Relevant Paragraph	Detail	Scheme Compliance
		on maximum rotation angle) and will therefore be raised above surrounding ground levels and fitted with a tracking system. During times of flooding, solar panels may be stowed by the tracking system algorithm onto a horizontal plane, to the minimum post height of 2.5 metres above ground level. This ensures that all sensitive and electrical equipment on the solar panel is raised to a minimum of 2.5 metres above ground level in the horizontal position. Following the implementation of embedded and additional mitigation measures in the design of the Scheme, the effects from flooding are considered not significant. Impacts on the Scheme from flooding have been considered in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**. It concludes that flood risk from all sources to the Scheme is negligible to low and embedded mitigation has been incorporated into the Scheme design to increase its flood resilience, such as siting critical infrastructure in Flood Zone 1, where there is less risk of flooding, and incorporating a minimum 8m buffer between infrastructure and all Main Rivers and Ordinary Watercourses. Full details of the embedded mitigation are contained within **ES Volume 3, Appendices 11-1 to 11-9 [EN010168/APP/6.3]**.

Relevant Paragraph	Detail	Scheme Compliance
		ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1] has also considered the direct and indirect impacts of climate change in terms of higher temperatures including heatwaves and wildfires. Table 7-34 and 7-35 of **ES Volume 1, Chapter 7: Climate Change** sets out the embedded mitigation measures, following the implementation of which, no significant impacts are anticipated to occur during the construction, operation (including maintenance) and decommissioning of the Scheme. These include (but are not limited to): • BESS Area systems will include HVAC systems which will be contained within the individual equipment containers as well as other measures outlined in the **BSMP [EN010168/APP/7.21]**; and • Workers and staff will monitor forecasts and plan works accordingly as described in the **Outline CEMP [EN010168/APP/7.12]**. These measures will be secured through Requirements under Schedule 2 of the **Draft DCO [EN010168/APP/3.1].**
Good Design		
Paragraph 2.5.2	Proposals for renewable energy infrastructure should demonstrate good design, particularly in respect of landscape and visual amenity, opportunities for co-existence/co-location with other marine and terrestrial uses, and in the design of the project to mitigate	As detailed in the **Design Approach Document [EN010168/APP/7.3]** and Section 2 of the Planning Statement, the Scheme has undergone an iterative design process which has resulted in the delivery of a functional and efficient Scheme design, allowing for the

Relevant Paragraph	Detail	Scheme Compliance
	impacts such as noise and effects on ecology and heritage.	delivery of over 100MW of renewable and low carbon energy while being sensitive to local context and surroundings. While it is acknowledged 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, the Scheme has been designed to be sensitive to place in accordance with this policy. As detailed in the **Design Approach Document [EN010168/APP/7.3]**, the following design principles have been adopted: • The design of the Scheme will be 'Landscape Led' and give due weight to the intrinsic character and beauty of the surrounding countryside; • Adherence to the mitigation hierarchy to reduce impacts and control any adverse effects on the environment throughout the lifecycle of the Scheme from construction through to operation and maintenance and decommissioning; • The Scheme will deliver a minimum 10% net gain for biodiversity through strategic habitat creation and enhancement measures; • The Scheme design will retain a degree of flexibility to enable it to adapt over time, be functional and fit for purpose, and respond to innovative and new technologies as well as building resilience to climate change;

Relevant Paragraph	Detail	Scheme Compliance
		• The Scheme will be carefully designed to minimise where practicable impacts on amenity from air quality, traffic and noise effects and safeguard the health and safety of local residents by securing suitable control measures during construction, operation and maintenance and decommissioning of the Scheme; • The Scheme will protect the water environment by adhering to good pollution control practice and be resilient from flooding both now and in the future and not increase the risk of flooding elsewhere; • The design of the Scheme will be sensitive to above and below ground heritage assets and their setting, by locating infrastructure at a suitable distance and through appropriate landscape screening; • The Scheme will be sensitive to existing land uses where practicable and maximise opportunities to strengthen green and blue infrastructure; and • The Scheme will seek to minimise the effects of the development on Public Rights of Way (PRoW) by incorporating measures to maintain, and where practicable, explore opportunities to improve the local footpath network.

Relevant Paragraph	Detail	Scheme Compliance
		The Scheme has embedded mitigation measures into the design during construction, operation and maintenance, and decommissioning, to help mitigate adverse impacts such as noise. These include noise measures that represent Best Practicable Means during construction and operation. These include noise abatement measures such as: • Depending on the location, plant and timing of works, temporary acoustic fencing will be installed around the HDD site boundary to screen receptors from noise emission. This mitigation could provide 10dB of attenuation when the noise screen completely hides the sources from the receiver. • Silencer units on 75% (198) of BESS Containers; • Silencer units on all (90) BESS Inverters; • Seven Conversion Units in the vicinity of the BESS Area to have silencers; and • All 132kV and 400kV Substation transformers to be housed in enclosures. Further mitigation measures are detailed in topic specific ES Chapters in **ES Volume 1 [EN010168/APP/6.1]**, and the **Outline CEMP [EN010168/APP/7.12]**, **Outline OEMP [EN010168/APP/7.13]**, and the **Outline Decommissioning Strategy [EN010168/APP/7.14]** which will be secured by requirements in the **Draft DCO [EN010168/APP/3.1]**.

Relevant Paragraph	Detail	Scheme Compliance
Flexibility		
Paragraph 2.6.1	Where details are still to be finalised, applicants should explain in the application which elements of the proposal have yet to be finalised, and the reason why this is the case.	The Applicant wishes to retain flexibility in the design of the Scheme at the time of submission so that the detailed design of the Scheme can be informed by technical considerations, post-consent work, and take advantage of any innovations in technology before construction. This is of particular importance due to the rapid pace of change in solar PV and battery storage technology, whilst maintaining a robust and comprehensive assessment of likely significant effects of the Scheme. The extent of flexibility required by the Scheme is described in **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]**. To maintain flexibility in the design and layout at this stage in the process and ensure maximum effects are assessed in the EIA and considered by the Secretary of State, the Scheme has adopted the Rochdale Envelope approach in accordance with the Planning Inspectorate's Advice Note 9.This involves specifying parameter ranges, including details of the maximum and where relevant minimum size (footprint, width, height), technology, and locations of the different elements of the Scheme where flexibility needs to be retained. The use of the Rochdale Envelope has therefore been adopted to ensure that the likely worst-case scenario is presented in the assessment of potential environmental effects from the Scheme.

Relevant Paragraph	Detail	Scheme Compliance
		The parameters for construction of the Scheme are set out in **Design Principles and Parameters [EN010168/APP/7.4]** which are secured under Requirement 5 (detailed design approval) of Schedule 2 in the **Draft DCO [EN010168/APP/3.1]**.
Paragraph 2.6.2	Where flexibility is sought in the consent as a result, applicants should, to the best of their knowledge, assess the likely worst-case environmental, social and economic effects of the proposed development to ensure that the impacts of the project as it may be constructed have been properly assessed.	The EIA presented within the **ES [EN010168/APP/6.1/6.2/6.3/6.4]** has been undertaken adopting the principles set out in the Planning Inspectorate's Advice Note Nine: Rochdale Envelope which provides guidance regarding the degree of flexibility that may be considered appropriate within an application for development consent under the Planning Act 2008. The advice note acknowledges there may be aspects of the Scheme design that are not yet fixed and, therefore, it may be necessary for the EIA to assess likely worst-case variations to ensure all foreseeable significant environmental effects of the Scheme are considered. The use of 'design parameters' is therefore adopted to present a likely worst-case assessment of potential environmental effects of elements of the Scheme that require flexibility. The design parameters maintain a degree of flexibility to allow the most appropriate technology to be used at the time of construction, for example the use of tracker or fixed Solar PV panels. These parameters and the elements of the Scheme that retain flexibility are detailed in the **Design Principles and Parameters [EN010168/APP/7.4]**. This will be secured through

Relevant Paragraph	Detail	Scheme Compliance
		Requirement 5 under Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**.
Need/Principle		
Paragraph 2.10.9	The government has committed to sustained growth in solar capacity to ensure that we are on a pathway that allows us to meet net zero emissions by 2050. As such, solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector.	This Policy confirms the government's commitment to sustained growth in solar capacity. The **Statement of Need [EN010168/APP/7.1]** sets out that the Scheme, if consented, will deliver large amounts of cheap, secure, and low carbon electricity which will help contribute to the UK achieve its Sixth Carbon Budget commitments and stay on track to achieve net zero by 2050. **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** sets out that the Scheme could provide enough electricity to power around 144,000 homes per year if tracker panels are utilised and 148,000 homes per year for fixed panels. This represents a significant contribution towards delivery of the government's energy objectives and target of net zero by 2050. The total energy generated by the Scheme would be around 23.54TWh and 24.26TWh over the 60-year Scheme lifespan for tracker and fixed panels respectively. Maximising the capacity of generation in the proposed location, through the scale of the Scheme represents a significant and commercially rational step forward in the fight against the global climate emergency.

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 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 [EN010168/APP/7.1]** sets out that the Scheme, if consented will deliver over 100 MW of cheap, secure, and low carbon electricity which will help the UK achieve its Sixth Carbon Budget commitments and stay on track to achieve net zero by 2050. **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** sets out that the Scheme could provide enough electricity to power around 144,000 homes per year if tracker panels are utilised and 148,000 homes per year for fixed panels. This represents a significant contribution towards delivery of the government's energy objectives and target of net zero by 2050. The total energy generated by the Scheme would be around 23.54TWh and 24.26TWh over the 60-year Scheme lifespan for tracker and fixed panels respectively. The Scheme is co-located with other functions as set out in as set out in **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** which details that BESS is incorporated as associated development. This allows the Scheme to store surplus electricity to be released at times of higher demand, improving efficiency and demonstrating efficient use of land.
Paragraph 2.10.11	The Powering Up Britain: Energy Security Plan states that government seeks large scale ground-mount solar deployment across the UK, looking for development mainly on brownfield, industrial and low and medium grade agricultural land. It sets out that solar and farming	The Scheme has undergone an iterative site selection process as detailed in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3]** and has considered the use of different land uses including brownfield, industrial and

Relevant Paragraph	Detail	Scheme Compliance
	can be complementary, supporting each other financially, environmentally and through shared use of land, and encourages deployment of solar technology that delivers environmental benefits, with consideration for ongoing food production or environmental improvement.	low and medium grade agricultural land. It concludes that following a comprehensive six-stage site selection process identifying a grid connection, planning and environmental constraints, and the suitability of previous land uses, that there are no more suitable or available locations within a 20 km search area than the proposed location for the Scheme and that the Scheme's location is therefore assessed to be suitable for the scale of solar development proposed. The Scheme will include wider environmental benefits, including benefits from decarbonisation but also ecological and landscape enhancements as set out in the **Outline LEMP [EN010168/APP/7.18]**. These include (but are not limited to): • Substantial new hedgerow and tree planting; • Extensive grassland habitat creation; • Connective woodland planting; • Enhanced riparian native planting; and • A net gain in biodiversity As set out in section 8.3 of the **Planning Statement [EN010168/APP/7.2]**, the design of the Solar PV Sites is compatible with certain farming practices, such as sheep grazing, which could continue during operation of the Scheme. Therefore, whilst the land would not be available for crop production, there may be an opportunity to limit the effects on agricultural production during the Scheme's lifetime through facilitating other forms of agricultural practice. Grazing

Relevant Paragraph	Detail	Scheme Compliance
		practices are set out in the **Outline LEMP [EN010168/APP/7.18]**. This will be secured through Requirement 7 under Schedule 2 of the **Draft DCO [EN010168/APP/3.1].**
Paragraph 2.10.13	Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation.	As explained in the **Statement of Need [EN010168/APP/7.1]** the Scheme will be a substantial renewable infrastructure asset, which if consented will deliver large amounts of cheap, secure and low-carbon electricity. **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** sets out that the Scheme could provide enough electricity to power around 144,000 homes per year if tracker panels are utilised and 148,000 homes per year for fixed panels. This represents a significant contribution towards delivery of the government's energy objectives and target of net zero by 2050. The total energy generated by the Scheme would be around 23.54TWh and 24.26TWh over the 60-year Scheme lifespan for tracker and fixed panels respectively.
Paragraph 2.10.14	Solar farms can be built quickly and, coupled with consistent reductions in the cost of materials and improvements in the efficiency of panels, large-scale solar is now viable in some cases to deploy subsidy-free.	As explained in the **Statement of Need [EN010168/APP/7.1]** the Scheme will deliver large amounts of cheap, secure, and low carbon electricity and has the potential to be operational by 2029.
Paragraph 2.10.15	Solar farm proposals are currently likely to consist of solar panel arrays, mounting structures, piles, inverters, transformers and cables.	The elements of the Scheme for which consent is sought are set out in Schedule 1 of the **Draft DCO [EN010168/APP/3.1]**. Work No.1 includes the ground

Relevant Paragraph	Detail	Scheme Compliance
		mounted solar photovoltaic (PV) generating station with a gross electrical output capacity of over 100 megawatts, and includes the solar panel arrays, mounting structures, inverters, transformers and cabling. The maximum parameters sought for these elements of the Scheme are set out in **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** and the **Design Principles and Parameters [EN010168/APP/7.4]**.
Paragraph 2.10.16	Associated infrastructure may also be proposed and may be treated, on a case by case basis, as associated development, such as energy storage, electrolysers associated with the production of low carbon hydrogen, or security arrangements (which may encompass flood defences, fencing, lighting and surveillance).	The Scheme also includes associated infrastructure including an energy storage facility as set out in Work No. 2 in Schedule 1 of the **Draft DCO [EN010168/APP/3.1]**. The full description of the Scheme is set out in **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** and displayed on the **Works Plans [EN010168/APP/2.3]**.
Paragraph 2.10.17	Along with associated infrastructure, a solar farm requires between 2 to 4 acres for each MW of output. A typical 50MW solar farm will consist of around 100,000 to 150,000 panels and cover between 125 to 200 acres. However, this will vary significantly depending on the site, with some being larger and some being smaller. This is also expected to change over time as the technology continues to evolve to become more efficient. Nevertheless, this scale of development will	The site selection process is detailed in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3]** which sets out the sites that were considered and assessed against a range of planning, environmental, and operational criteria. The environmental effects of the Scheme are captured and reported in the accompanying **ES [EN010168/APP/6.1]**.

Relevant Paragraph	Detail	Scheme Compliance
	inevitably have impacts, particularly if sited in rural areas.	
Paragraph 2.10.18	The key considerations involved in the siting of a solar farm are likely to be influenced by factors set out in the following paragraphs, in addition to considerations specific to individual projects.	**ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3]** sets out the Applicants assessment methodology during the site selection process. The Applicant followed a six-stage approach to identify and evaluate the proposed Scheme location and other potential areas for solar development, as follows: • Stage 1: Identification of an area of search near the available grid connection point. • Stage 2: Exclusion of various planning, environmental and spatial constraints, in accordance with policy considerations (such as a preference not to site on best and most versatile agricultural land), to identify the most unconstrained land. • Stage 3: Application of considerations around site size and land assembly, use of previously developed land and topography to identify potential development areas on the remaining land. • Stage 4: Evaluation of the identified potential development areas against assessment indicators such as ecology and biodiversity, land use, landscape and visual, flood risk etc. • Stage 5: Widening the search to consider further potential development areas on parcels of Grade 3 agricultural land, and land within flood zones 2 and 3.

Relevant Paragraph	Detail	Scheme Compliance
		• Stage 6: Widening the search to consider further potential development areas on parcels of land with a higher gradient (5% or less). As demonstrated, the site selection process took account of a range of factors including planning and environmental constraints and national and local planning policy.
Irradiance and Site Topography		
Paragraph 2.10.19	Irradiance will be a key consideration for the applicant in identifying a potential site as the amount of electricity generated on site is directly affected by irradiance levels. Irradiance of a site will in turn be 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.	Given topography is a key factor in site selection, it was considered during the site selection process, as set out in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3]**. As described in the **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3]**, irradiance levels are in turn 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. As flatter land is considered to be suitable a gradient of 3% or less was initially mapped for Stage 3 of the site selection assessment (see process above). This land was taken forward to the Stage 4 assessment therefore identifying the flattest areas of land within the unconstrained area. As a final stage, the Applicant has considered additional land within the 20 km search area with a gradient of 5% or less.

Relevant Paragraph	Detail	Scheme Compliance
		The Scheme will be located in Wiltshire, which benefits from one of the highest irradiance levels in the UK and is therefore a favourable location for solar development.
Paragraph 2.10.20	In order to maximise irradiance, applicants may choose a site and design its layout with variable and diverse panel types and aspects, and panel arrays may also follow the movement of the sun in order further to maximise the solar resource.	Due to the fast-evolving pace of Solar PV technology, the Scheme has allowed for flexibility in the design, allowing opportunity to utilise specific technology closer to construction within the parameters outlined in **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** and the **Design Approach Document [EN010168/APP/7.3]**. For example, both tracker and fixed panels are proposed at this stage, with the final design being confirmed at the detailed design stage.
Network Connection		
Paragraph 2.10.21	Applicants should consider important issues relating to network connection at Section 4.11 of EN-1 and in EN-5. In particular, and where appropriate, applicants should proceed in a manner consistent with the regulatory regime for offshore transmission networks established by Ofgem, details of which are set out in EN-5.	Proximity to an available grid connection is fundamental to the delivery of the Scheme and the Applicant has undertaken engagement with National Grid in order to determine the appropriate point of connection as set out in the **Grid Connection Statement [EN010168/APP/7.5]**.
Paragraph 2.10.22	Many solar farms are connected into the local distribution network. The capacity of the local grid network to accept the likely output from a proposed solar farm is critical to the technical and commercial feasibility of a development proposal.	As set out in **ES Volume 3, The Scheme [EN010168/APP/6.1]**, the Scheme will connect to the 400kV Existing National Grid Melksham Substation which was identified as having available capacity for a utility scale energy project, such as the Scheme. **ES Volume 1, Chapter 4: Alternatives and Design**

Relevant Paragraph	Detail	Scheme Compliance
		Evolution [EN010168/APP/6.1] sets out how Minety Substation was considered but discounted following consultation with National Grid. Whilst Minety substation does house 400kV infrastructure, the Applicant's discussions with National Grid confirmed there was no connection available at Minety for the Scheme. The **Grid Connection Statement [EN010168/APP/7.5]** explains that the Applicant has accepted a valid grid connection offer from NESO to connect the Scheme to the NETS at the Existing National Grid Melksham Substation.
Paragraph 2.10.25	To maximise existing grid infrastructure, minimise disruption to existing local community infrastructure or biodiversity and reduce overall costs, applicants may choose a site based on nearby available grid export capacity.	As explained in the **Statement of Need [EN010168/APP/7.1]** the utilisation of existing and available infrastructure to meet the urgent need for new large-scale solar generation was an important factor in the site selection for the Scheme. The Existing National Grid Melksham Substation has available grid connection capacity which the Scheme has contracted to use. Further, the Existing National Grid Melksham Substation is connected to an existing part of the NETS with sufficient capacity to transmit the energy the Scheme will generate to consumers nationally as well as into local distribution networks. Section 8.4 of the **Statement of Need [EN010168/APP/7.1]** further explains the suitability of the grid connection and outlines that the flow of energy

Relevant Paragraph	Detail	Scheme Compliance
		from the Scheme is unlikely to cause constraints on the NETS during normal conditions.
Paragraph 2.10.26	Where this is the case, applicants should consider the cumulative impacts of situating a solar farm in proximity to other energy generating stations and infrastructure.	The cumulative impacts of the Scheme and proximity to other energy generating stations and infrastructure is assessed in **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1]**. Within the majority of technical chapters, taking a conservative worst case approach, significant cumulative effects with the short list of developments are identified at a limited and discrete number of receptors comprising tourism and recreation impacts during the construction phase for example, on Corsham Park, PRoW WT|CORM|122, WT|HULL|29, and Sustrans Cycle Route 403, and on skylark at a District level. However as set out in the **Planning Statement [EN010168/APP/7.2]**, these significant cumulative effects have only been identified during the construction phase and do not continue into the operation of the Scheme. Accordingly, significant cumulative effects are limited to the short-term. Furthermore, inter project communication will take place to minimise tourism and recreation impacts whilst the impact to skylark is likely to reduce to not significant as and when further details of mitigation are proposed in any application to discharge the relevant conditions of 18/08271/OUT (which would be required before any development could take place).

Relevant Paragraph	Detail	Scheme Compliance
		ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] has identified significant cumulative effects within the 1km Local Study Area during construction and Year 1. However, there are no cumulative development sites within the 1km Study Area and the significant effects are derived solely from the Scheme. The Scheme effects included consideration of the existing Hullavington Solar Farm within 1 km Local Study Area as part of the baseline. **ES Volume 1, Chapter 16: Socio-economics, Tourism and Recreation [EN010168/APP/6.1]** has identified medium-term temporary significant cumulative effects on the following tourism and recreation receptors during construction: • Moderate adverse (significant) effect to Corsham Park. This is anticipated to be generated by cumulative impacts from project IDs 101, 103, 105, and 319; • Moderate adverse (significant) effects to Footpath WT|HULL|29 from project ID 58 and byway open to all traffic WT|CORM|122 from project IDs 101, 103, 105, and 319; and • Long-distance recreation routes – are anticipated to experience a moderate adverse effect overall within the 5 km Study Area (significant). Cumulative moderate adverse effects (significant) are therefore anticipated on Long Path (refer to project IDs 101, 103, and 358), Palladian Way (refer to project IDs 58 and

Relevant Paragraph	Detail	Scheme Compliance
		221), and Wiltshire Way (refer to project ID 358), albeit that are no greater in significance than for the Scheme in isolation. Sustrans Cycle Route 403 (also known as the North Wiltshire Rivers Route) is also anticipated to experience a significant cumulative moderate adverse effect, from project IDs 103, 105, and 319. These effects, whilst significant, are temporary limited to construction phase and year 1 of the operation and maintenance phase (in the case of landscape). As such these are expected to reduce to non-significant levels following the completion of the aforementioned phases. It is important to note that the cumulative nature of these effects does not imply long-term harm, as they are inherently short-lived and will diminish as the project transitions into its steady-state operation.
Proximity to Dwellings		
Paragraph 2.10.27	Utility-scale solar farms are large sites that may have a significant zone of visual influence. The two main impact issues that determine distances to sensitive receptors are therefore likely to be visual amenity and glint and glare. These are considered in Landscape, Visual and Residential Amenity (paragraphs 2.10.93-2.10.101) and Glint and Glare (paragraphs 2.10.102 – 2.10.106) impact sections below.	**ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** confirms there are two residential properties that have a visual relationship with the CNL (Widley's Farm, Sherston (RI014) and Fosse Lodge (RI024), located in Grittleton. RI014 has a visual relationship with Lime Down A and RI024 with Lime Down C. Once embedded mitigation has established, at Year 15 the change would not be significant.
Agricultural Land Classification		

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Paragraph 2.10.28	Solar is a highly flexible technology and as such can be deployed on a wide variety of land types.	As detailed in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6/3]** a variety of land types were explored during the site selection process including previously developed land (PDL), brownfield land, contaminated land, industrial land and commercial rooftops. As set out in Section 2.4 of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6/3]**, an assessment of PDL/brownfield land within the 20 km search area identified no land of an adequate area to facilitate a large scale solar project either individually or in combination with other sites. Consideration was given to commercial rooftops within a 20 km search area. However, initial considerations showed that it was unlikely that there would be rooftops or combined premises of an adequate area to facilitate a large-scale solar project or provide a viable network of sites in close proximity for the purposes of the Scheme.
Paragraph 2.10.29	While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of “Best and Most Versatile” agricultural land where possible. ‘Best and Most	As detailed in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3]** a variety of land types were explored during the site selection process including PDL, brownfield land, contaminated land, industrial land and commercial rooftops. The assessment of PDL/brownfield land within a 20 km search area identified no land of an adequate area to facilitate a large-scale solar project either individually or in combination with other sites.

Relevant Paragraph	Detail	Scheme Compliance
	Versatile agricultural land is defined as land in grades 1, 2 and 3a of the Agricultural Land Classification	In terms of brownfield land, the brownfield registers of local planning authorities within the search area were reviewed. and of the sites identified over 1 ha in size, none of the sites were deemed large enough to provide a viable land parcel of at least 40 ha, therefore no individual brownfield site from the registers provided an adequate area to facilitate a large NSIP scale solar project equivalent to the Scheme. Furthermore, the majority of sites were not considered to be available, given planning permissions were in place for residential development and/or are allocated for residential/mixed use development. Initial considerations of rooftop solar showed that it was unlikely that there would be rooftops or combined premises of an adequate area to facilitate a large-scale solar project or provide a viable network of sites in close proximity covering an area of approximately 1,000 ha. Individual commercial rooftops do not meet the minimum 40 ha site threshold. This is the minimum viable site size threshold (based upon the balance of costs of connecting infrastructure between individual sites and electricity losses from the multiple connection cabling necessary) to form part of a network of sites in close proximity. Agricultural land was a key consideration during the site selection process as detailed in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3]**. which sets out the six stage

Relevant Paragraph	Detail	Scheme Compliance
		approach adopted when assessing other suitable alternative sites for the Scheme and confirms that in the initial search for sites, agricultural land within a classification of Grade 3, Grade 2 or Grade 1 was excluded from the search in order to identify sites on non-BMV land. In addition non-agricultural land, such as rooftops and previously developed land was considered, however none of the alternative sites (on non-agricultural land or lower quality agricultural land) were assessed to be viable for the Scheme, and therefore Grade 3 agricultural land was added to the search area. Within the Scheme, the majority of the Solar PV Sites (67%) comprise land within Subgrades 3b and 4 and therefore is not best and most versatile (BMV) agricultural land. Approximately 242 ha of the Solar PV Sites is classified as BMV quality, mostly in Subgrade 3a (the lowest grade of BMV land) with a small proportion of Grade 2. There is no Grade 1 land (being the highest grade) within the Solar PV Sites. As shown on **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [EN010168/APP/6.2]** and set out in the **Planning Statement [EN010168/APP/7.2]**, the majority of the Grade 3a BMV land (and some smaller pockets of Grade 2 BMV Land) located within the Solar PV Sites is intermingled with sections of non-BMV land (Subgrade 3b and Grade 4). In several instances, fields contain a mixture

Relevant Paragraph	Detail	Scheme Compliance
		of both BMV and non-BMV land. In such circumstances, removal of the Grade 3a BMV land from the Order Limits would not be practicable and would adversely affect the Scheme's overall viability. Overall, as the assessment of PDL, brownfield land, contaminated land, and commercial rooftops were ruled out of the site selection process, and the site selection process has demonstrated that there was a preference not to develop on BMV land, the selected site has been considered the most appropriate location for the Scheme, with no other suitable alternatives identified.
Paragraph 2.10.30	Whilst the development of ground mounted solar arrays is not prohibited on Best and Most Versatile agricultural land, or sites designated for their natural beauty, or recognised for ecological or archaeological importance, the impacts of such are expected to be considered and are discussed under paragraphs 2.10.73 – 92 and 2.10.107 – 2.10.126.	It is acknowledged that development of ground mounted solar arrays is not prohibited on BMV agricultural land and the impacts of the Scheme on BMV land are assessed in **ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]**. Although the Scheme comprises approximately 240 ha of BMV agricultural land, mostly in subgrade 3a, this is considered temporary and reversible as it will be decommissioned following it's 60-year operational life, there will not affect the long-term agricultural resource. It is also considered that the benefits of the Scheme justify the inclusion of BMV land, namely the Scheme's contribution to meeting the established and urgent need for renewable energy infrastructure such as solar, which has been identified as a critical national priority. Further justification for the use of BMV is

Relevant Paragraph	Detail	Scheme Compliance
		detailed within section 8.3 of the **Planning Statement [EN010168/APP/7.2]**.
Paragraph 2.10.31	It is recognised that at this scale, it is likely that applicants' developments will use some agricultural land. Applicants should explain their choice of site, noting the preference for development to be on suitable brownfield, industrial and low and medium grade agricultural land.	It is acknowledged that there may be some agricultural land use with developments at this scale. **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3]** sets out the methodology adopted when assessing other suitable alternative sites for the Scheme and confirms that in the initial search for sites, agricultural land within a classification of Grade 3, Grade 2 or Grade 1 was excluded from the search in order to identify sites on non-BMV land. It also sets out how the Applicant considered non-agricultural land, such as rooftops and PDL. Ultimately, none of the alternative sites (on non-agricultural land or lower quality agricultural land) were assessed to be viable for the Scheme, mainly due to the limited size and availability of PDL and rooftop space, and therefore Grade 3 agricultural land was added to the search area. On this basis, it can be demonstrated that the Applicant has taken a sequential approach site selection in order to minimise impacts on BMV land.
Paragraph 2.10.32	Where sited on agricultural land, consideration may be given as to whether the proposal allows for continued agricultural use and/or can be co-located with other functions (for example, onshore wind generation, storage, hydrogen electrolysers) to maximise the efficiency of land use.	As set out in Section 8.3 of the **Planning Statement [EN010168/APP/7.2]**, the design of the Solar PV Sites is compatible with certain farming practices, such as grazing, which could continue during operation of the Scheme. Therefore, whilst the land would not be primarily available for food production, there may be an opportunity to limit the effects on agricultural production during the Scheme's lifetime through facilitating other forms of agricultural practice. The

Relevant Paragraph	Detail	Scheme Compliance
		Outline LEMP [EN010168/APP/7.18] also sets out the grazing practices that could be undertaken. This will be secured through Requirement 7 under Schedule 2 of the **Draft DCO [EN010168/APP/3.1].**
Paragraph 2.10.33	The Agricultural Land Classification (ALC) is the only approved system for grading agricultural quality in England and Wales and, if necessary, field surveys should be used to establish the ALC grades in accordance with the current, or any successor to it, grading criteria and identify the soil types to inform soil management at the construction, operation, and decommissioning phases in line with the Defra Construction Code.	Soil surveys have been carried out for the Scheme and are detailed in **ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resource Survey Report [EN010168/APP/6.3]**. The results are reported within **ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]** and Table 17.6 of shows the distribution of Agricultural Land (ALC) Grades within the Solar PV Sites. Their distribution is shown in **Figure 17-2: Agricultural Land Classification Mapping**. Approximately 240 ha (33% of agricultural land) is classified as BMV quality mostly in Subgrade 3a with a small proportion of Grade 2, and around 477 ha (67%) as Subgrade 3b and Grade 4 which is not BMV land.
Paragraph 2.10.34	Applicants are encouraged to develop and implement a Soil Resources and Management Plan which could help to use and manage soils sustainably and minimise adverse impacts on soil health and potential land contamination. This should be in line with the ambition set out in the Environmental Improvement Plan to bring at least 40% of England's agricultural soils into sustainable management by 2028 and increase this up to 60% by 2030.	The **Outline Soil Resources Management Plan [EN010168/APP/7.15]** sets out the overall approach for managing soil resources affected by the Scheme during the construction, operation and maintenance and decommissioning phases. This includes following general good practice measures such as minimising disturbance to soils at all stages, movement of vehicles restricted to designated hall roads, storage in designated stockpiles and recording soil handling operations. A requirement in the **Draft DCO [EN010168/APP/3.1]** will secure a detailed Soil Resources Management Plan that must be

Relevant Paragraph	Detail	Scheme Compliance
		substantially in accordance with the **Outline Soil Resources Management Plan [EN010168/APP/7.15]**. The full list of relevant policy and guidance is set out in Section 1.2 of the **Outline Soil Resources Management Plan [EN010168/APP/7.15].**
Paragraph 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.	Agricultural land was a key consideration during the site selection process as detailed in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** and the **Design Approach Document [EN010168/APP/7.3]**. This included a preference not to site on best and most versatile agricultural land. Although the Scheme comprises approximately 242 ha of BMV agricultural land, mostly in subgrade 3a, this is considered temporary and reversible as it will be decommissioned following it's 60-year operational life, there will not affect the long-term agricultural resource. It is also considered that the substantial benefits of the Scheme justify the inclusion of BMV land, namely the Scheme's contribution to meeting the established and urgent need for renewable energy infrastructure such as solar, which has been identified as a critical national priority. Further justification for the use of BMV is detailed within section 8.3 of the **Planning Statement [EN010168/APP/7.2]**. **ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]** sets out the embedded and additional mitigation incorporated into the Scheme design to minimise impacts on soils. This includes the

Relevant Paragraph	Detail	Scheme Compliance
		preparation of and adherence to the **Outline Soil Resources Management Plan [EN010168/APP/7.15]** as well as the **Outline CEMP** [**EN010168/APP/7.12]**, secured through Requirement 13 under Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**,which will incorporate good practice measures to ensure adverse effects on agricultural land and soil are minimised wherever possible., which include but are not limited to: • Only handling or tracking soils that are in a dry and friable condition; and • Ensuring topsoil and subsoils are handled separately when being stripped, stored and reinstated.
Accessibility		
Paragraph 2.10.35	Applicants will need to consider the suitability of the access routes to the proposed site for both the construction and operation of the solar farm with the former likely to raise more issues.	Section 1.4 of **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]** sets out the vehicular access arrangements for the Scheme to be used during construction and operation. This includes consideration of the suitability of the routes. **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]** sets out that there are 21 access points and three crossings at the Solar PV Sites, all taken from the public highway. The proposed access arrangements are considered suitable for the following reasons: • The majority of the accesses are currently regularly used by agricultural vehicles and are

Relevant Paragraph	Detail	Scheme Compliance
		therefore considered appropriate for use by construction vehicles, with formalisation and widening as required; • Banksmen will be deployed at each access whenever construction vehicles are accessing or egressing the Order Limits; and • All construction vehicles will access and egress in a forward gear. **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]** also sets out that a total of 28 access points will be required for the construction phase of the Cable Route Corridor, approximately one every kilometre. Banksmen will be deployed at each access whenever construction vehicles are accessing or egressing the Cable Route Corridor. This will ensure the safe movement of construction vehicles in and out of the access points.
Paragraph 2.10.36	Given that potential solar farm sites are largely in rural areas, access for the delivery of solar arrays and associated infrastructure during construction can be a significant consideration for solar farm siting.	As set out in **ES Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.1]**, site accessibility for construction traffic was a key consideration during the site selection process. This included the consideration of the following criteria: • General suitability of the public highway. • Distance to the primary road network. • Sensitivity of land uses along the route to the primary road network. • Physical or engineering constraints (bridges, level crossings, visibility, access points etc.).

Relevant Paragraph	Detail	Scheme Compliance
		• Access to fields without having to remove hedgerows. The assessment tables are set out in Annex D of the **ES Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.1]** demonstrate how the potential sites performed in relation to access for construction traffic. For the site of the Scheme, it was noted that access was possible via the A429 and the local highway network, and local roads may require some mitigation. Section 13.9 of **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** sets out embedded mitigation measures which include consideration of access associated with the Scheme. This includes the provision of the **Outline CTMP [EN010168/APP/7.22]** which includes, but is not limited to, construction vehicle routing; construction vehicle trip generation; and construction access arrangements. Section 13.12 of **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** concludes that, with the implementation of embedded mitigation measures, there are no residual significant effects anticipated in relation to transport and access during the operational phase, and residual effects are short-term and temporary during both the construction and decommissioning phases.

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 2.10.37	Developers will usually need to construct on-site access routes for operation and maintenance activities, such as footpaths, earthworks, or landscaping.	As outlined in **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** access tracks would be established within the Solar PV Sites for operation and maintenance activities. These would typically be a minimum of 3.5 m wide (with up to 6 m wide passing places) compacted stone tracks with 1:2 gradient slopes on either side. Where practicable, existing access tracks will be used and upgraded. The indicative locations for the access tracks are shown on **ES Volume 2, Figure 3-1: Indicative Site Layout Plan [EN010168/APP/6.2]**. The locations and alignments of the internal access tracks within the Solar PV Sites are likely to change depending on the final layout design and the construction methodology.
Paragraph 2.10.38	In addition, sometimes access routes will need to be constructed to connect solar farms to the public road network.	Details of the proposed construction accesses are set out in Section 13.10 of **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]**. There are 21 access points and three crossings required at the Solar PV Sites and 28 access points will be required for the construction phase of the Cable Route Corridor, approximately one every kilometre. The proposed locations of the access points are shown in **ES Volume 2, Figure 13-11: Construction Access Locations - Solar PV Sites [EN010168/APP/6.2]** and **ES Volume 2, Figure 13-12: Construction Access Locations - Cable Route Corridor [EN010168/APP/6.2]**.

Relevant Paragraph	Detail	Scheme Compliance
		All points of access and internal access tracks have been appropriately designed to accommodate HGV and AIL movements where required. The **Outline CTMP [EN010168/APP/7.22]** provides a framework for the management of construction vehicle movements to and from the Scheme, to ensure that the effects of the temporary construction phase on the local highway network are minimised. The **Outline CTMP [EN010168/APP/7.22]** sets out construction access arrangements, construction vehicle routing, construction vehicle trip generation, and the management/mitigation measures. This will be secured through Requirement 15 under Schedule 2 of the **Draft DCO [EN010168/APP/3.1].**
Paragraph 2.10.39	Applications should include the full extent of the access routes necessary for operation and maintenance and an assessment of their effects.	**ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** and **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6/3]** details the full extent of the access routes necessary for the operation and maintenance of the Scheme and their effects. As explained in **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]**, highway improvements are required to facilitate construction. Works within the 'Highway Improvement Areas' comprise modifications to the existing highway such as improvements to road edge where it is deteriorated, minor works to enable construction vehicle movements such as provision of passing places within the existing highway boundary,

Relevant Paragraph	Detail	Scheme Compliance
		traffic management measures and provision of visibility splays.
Public Rights of Ways		
Paragraph 2.10.40	Proposed developments may affect the provision of public rights of way networks.	An assessment of the likely effects on Public Rights of Way (PRoW) is set out in the following chapters of the ES: • **ES Volume 1, Chapter 8: Landscape and Visual [EN101068/APP/6.1]** assesses the impacts on PRoW from a landscape and visual perspective and concludes that during construction and at Operation Year 1, 27 public receptors would experience significant visual effects. As planting matures, at Operation – Year 15 and at de-commissioning, significant effects would be reduced to 10 affected public receptors. • **ES Volume 1, Chapter 13: Transport and Access [EN101068/APP/6.1]** which concludes in Section 13.12 that during the construction phase all impacts to the PRoW network are anticipated to have minor or negligible effects. • **ES Volume 1, Chapter 16: Socio-economics, Tourism and Recreation [EN101068/APP/6.1]** concludes that there will be residual adverse effects on long distance recreational routes (during construction, peak replacement activities and decommissioning) together with adverse effects on public bridleway WT/MALW/54 during the construction phase.

Relevant Paragraph	Detail	Scheme Compliance
		However, there are also enhancements to PROW as a result of the Scheme as it provides 12.8 km of new non-vehicular permissive paths on each of the Solar PV Sites which encourages a modal shift to more sustainable travel modes and will provide pedestrians and horse riders with improved accessibility to the countryside and improved connectivity to the wider PROW network.
Paragraph 2.10.41	Public rights of way may need to be temporarily closed or diverted to enable construction, however, applicants should keep, as far as is practicable and safe, all public rights of way that cross the proposed development site open during construction and protect users where a public right of way borders or crosses the site.	It is anticipated that PRoW which cross the Order Limits will generally remain open during the construction, operation and maintenance and decommissioning phases of the Scheme and will be managed in accordance with the measures in the **Outline Public Rights of Way and Permissive Paths Management Plan [EN010168/APP/7.17]** to ensure user safety, for instance at construction vehicle crossings. As set out in the **Outline Public Rights of Way and Permissive Paths Management Plan [EN010168/APP/7.17]** secured by Requirement 16 under Schedule 2 of the **Draft DCO [EN010168/APP/3.1],** there will be the following temporary closures/diversions: • Diversion of PRoW MALW54 will be temporarily diverted for the duration of the construction phase for health and safety reasons and to avoid conflict with construction vehicles accessing Lime Down E, at Access 18. The diversion will run adjacent to the existing

Relevant Paragraph	Detail	Scheme Compliance
		alignment. Once construction is complete, the PRoW will return to its existing alignment; • PRoW GRIT20 (located in the Cable Route Corridor) will be temporarily diverted for the duration of the construction phase for health and safety reasons and to avoid conflict with construction vehicle access at Access 102. The diversion will run adjacent to the construction compound to the north and east. Once construction is complete, the PRoW will return to its existing alignment. • Temporary closures may also be required during construction for installation of Grid Connection Cables, but this will likely last not more than a day (or overnight). Where temporary closures are deemed to be necessary, these will be prioritised for overnight work (when there are unlikely to be PRoW users), and sufficient notice will be given users and the local highway authority so far as practicable.
Paragraph 2.10.42	Applicants are encouraged to design the layout and appearance of the site to ensure continued recreational use of public rights of way where possible during construction, and in particular during operation of the site.	**ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3]** has considered the presence of PRoWs during the site selection process to ensure that impacts were minimised. As set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]**, the Scheme has also sought to minimise the effects of the

Relevant Paragraph	Detail	Scheme Compliance
		development on PRoW by incorporating measures to maintain, and where practicable, explore opportunities to improve the local footpath network. It is anticipated that PRoW which cross the Order Limits will generally remain open during the construction, operation and maintenance and decommissioning phases of the Scheme and will be managed in accordance with the measures in the **Outline PRoW and Permissive Paths Management Plan [EN010168/APP/7.17]** to ensure user safety, for instance at construction vehicle crossings. This will be secured through Requirement 16 under Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**. However, the following temporary closures/diversions are also envisaged (see the **Outline Public Rights of Way and Permissive Paths Management Plan [EN010168/APP/7.17])**: • PRoW MALW54 will be temporarily diverted for the duration of the construction phase for health and safety reasons and to avoid conflict with construction vehicles accessing Lime Down E, at Access 18. The diversion will run adjacent to the existing alignment. Once construction is complete, the PRoW will return to its existing alignment; • PRoW GRIT20 (located in the Cable Route Corridor) will be temporarily diverted for the duration of the construction phase for health

Relevant Paragraph	Detail	Scheme Compliance
		and safety reasons and to avoid conflict with construction vehicle access at Access 102. The diversion will run adjacent to the construction compound to the north and east. Once construction is complete, the PRoW will return to its existing alignment. • Temporary closures may also be required during construction for installation of Grid Connection Cables, but this will likely last not more than one day (or overnight). Where temporary closures are deemed to be necessary, these will be prioritised for overnight work (when there are unlikely to be PRoW users), and sufficient notice will be given to users and the local highway authority so far as practicable.
Paragraph 2.10.43	Applicants are encouraged where possible to minimise the visual impacts of the development for those using existing public rights of way, considering the impacts this may have on any other visual amenities in the surrounding landscape.	For public receptors (public rights of way) during each phase of the Scheme, **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** (Table 8-19) concludes that during construction and at Operation Year 1, 27 public receptors would experience significant visual effects. As planting matures, at Operation – Year 15 and at decommissioning, significant effects would be reduced to 10 affected public receptors. Where significant long-term effects on public receptors remain at Year 15, this is primarily because mitigation is not proposed as it would not be appropriate to long-term landscape character and the legacy landscape. For example, where footpaths diagonally cross fields, new hedgerows to screen views of infrastructure would not

Relevant Paragraph	Detail	Scheme Compliance
		be consistent with the regular pattern of fields which is characteristic of the existing landscape. Other instances of significant long-term visual effects on public receptors relate to the local topography where there are views from higher ground to infrastructure which cannot be fully alleviated by mitigation. In effect, the temporary harm is accepted in favour of the benefits of the long-term legacy landscape.
Paragraph 2.10.44	Applicants should consider and maximise opportunities to facilitate enhancements to the public rights of way and the inclusion, through site layout and design of access, of new opportunities for the public to access and cross proposed solar development sites (whether via the adoption of new public rights of way or the creation of permissive paths), taking into account, where appropriate, the views of landowners.	The Scheme includes the creation of new 12.8 km of non-vehicular permissive paths on each of the Solar PV Sites for the lifetime of the Scheme to provide pedestrians and riders improved accessibility to the countryside and improved connectivity of the wider PRoW network. The permissive paths will provide a beneficial impact on PROW use for local users and visitors through mitigating adverse impacts on other PROWs and providing alternative access routes to the use of the local highway network. The location of the permissive paths is outlined on the **Works Plan [EN010168/APP.2.3]** as Work No.10B and they are listed in the **Outline Public Rights of Way and Permissive Paths Management Plan [EN010168/APP/7.17]** secured through Requirement 16 under Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**.
Paragraph 2.10.45	Applicants should set out detail on how public rights of way would be managed to ensure they are safe to use in an outline Public Rights of Way Management Plan.	The Applicant has prepared an **Outline Public Rights of Way and Permissive Paths Management Plan [EN010168/APP/7.17]** to ensure that PRoW remain accessible and safe at all times throughout the

Relevant Paragraph	Detail	Scheme Compliance
		construction, operation and maintenance, and decommissioning phases of the Scheme. This will be secured through Requirement 16 under Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**. As set out in Section 3.2 and 3.3 **of the Outline Public Rights of Way and Permissive Paths Management Plan [EN010168/APP/7.17]**, these measures include for example where vehicles are required to cross a PRoW in the Solar Site: • The provision of banksmen to hold vehicles if a PRoW user is present and advise PRoW users of the potential for construction vehicles to be present; • Wider access tracks to be used where possible to ensure vehicles can pass PRoW users safely; • Speeds to be limited to 5-10 mph; • Drivers will stop and give-way to any PRoW user that they encounter; • Appropriate signage will be installed along the PRoW to make PRoW users aware of the construction activity. This will include information on construction times and contact details for a public liaison officer; • The PRoW will be kept clear of construction vehicles and apparatus outside of permitted construction hours so far as is practicable to do so; and

Relevant Paragraph	Detail	Scheme Compliance
		• Any damage to the surface of the PRoW will be repaired as soon as practicable. The surface will be returned to its original condition following completion of construction. It also includes temporary diversions at PRoW MALW54 and PRoW GRIT20 for the duration of the construction phase for health and safety reasons and to avoid conflict with construction vehicles.
Security and Lighting		
Paragraph 2.10.46	Security of the site is a key consideration for developers. Applicants may wish to consider not only the availability of natural defences such as steep gradients, hedging and rivers but also perimeter security measures such as fencing, electronic security, CCTV and lighting, with the measures proposed on a site-specific basis.	Security measures, including fencing and CCTV, are set out in **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]**. These measures include deer wire mesh and wooden post fencing, palisade fencing around the substations and BESS Area, and pole mounted internal facing CCTV around the permitter of the operational elements of the Solar PV Sites. Details of site security during the construction and operation of the Scheme are also set out in Section 2.11 the **Outline CEMP [EN010168/APP/7.12]** and Section 2.16 of the **Outline OEMP [EN010168/APP/7.13]**. These measures will be secured through Requirements under Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**. Site security during construction will be managed by the contractor(s). The site security fencing will remain in place throughout the duration of the construction

Relevant Paragraph	Detail	Scheme Compliance
		period. Any storage of materials will be kept secure to prevent theft or vandalism. A safe system for accessing the materials storage areas will be implemented by the contractor(s). There will be designated security staff during construction who will manage the Order Limits and patrol the perimeter.
Paragraph 2.10.47	Applicants should assess the visual impact of these security measures, as well as the impacts on local residents, including for example issues relating to intrusion from CCTV and light pollution in the vicinity of the site.	Lighting is generally not required within the Solar Arrays for the operational phase. Motion sensing security lighting will be provided within substations and within the BESS to be used only for maintenance and security purposes. Temporary site lighting during construction will be required to enable safe working during construction and decommissioning during hours of darkness and will be designed as far as reasonably practicable to minimise potential for light spillage outside the Sites and Cable Route Corridor, particularly towards houses, traffic and ecological habitats.
Paragraph 2.10.48	Applicants should consider the need to minimise the impact on the landscape and the visual impact of security measures.	As outlined in **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]**, new planting along the boundary of substations and energy storage areas is proposed to filter the presence of security measures in the landscape and provide softening and screening to any potential light spill.
Technical Considerations		
Paragraph 2.10.49	Applications for solar farms are likely to comprise a number of elements including solar panel arrays, piling, inverters, mounting structures, cabling, earthworks, and	The elements of the Scheme for which consent is sought are set out in Schedule 1 of the **Draft DCO [EN010168/APP/3.1]** and correspond with the work

Relevant Paragraph	Detail	Scheme Compliance
	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.	number areas shown on the **Works Plans [EN010168/APP/2.3]**. Work No.1 includes the ground mounted solar photovoltaic (PV) generating station with a gross electrical output capacity of over 100 megawatts, and includes the solar panel arrays, mounting structures, inverters, transformers and cabling. The Scheme, including battery storage, is described in full in **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]**.
Capacity of a Site		
Paragraph 2.10.50	Solar panels generate electricity in direct current (DC) form. A number of panels feed an external inverter, which is used to convert the electricity to alternating current (AC). After inversion a transformer will step-up the voltage for export to the grid. Because the inverter is separate from the panels, the total capacity of a solar farm can be measured either in terms of the combined capacity of installed solar panels (measured in DC) or in terms of combined capacity of installed inverters (measured in AC).	As set out in **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** the Scheme would comprise Conversion Units which incorporate inverters, transformers and switchgear and are required to manage the electricity generated by the Solar PV Panels. These would either be standalone equipment or they would be housed ('integrated') together within a container.
Paragraph 2.10.53	From the date of designation of this NPS, for the purposes of Section 15 of the Planning Act 2008, the maximum combined capacity of the installed inverters (measured in alternating current (AC)) should be used for the purposes of determining solar site capacity.	**ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** sets out details concerning the technology associated with the Scheme. The maximum AC for the Scheme is 500 MW.
Paragraph 2.10.55	The installed generating capacity of a solar farm will decline over time in correlation with the reduction in	**ES Volume 2, Figure 3-1: Indicative Site Layout Plan [EN010168/APP/6.2]** sets out the indicative

Relevant Paragraph	Detail	Scheme Compliance
	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.	proposed site layout for the Scheme. As set out in the **Statement of Need [EN010168/APP/7.1]** the Plan indicates that the Scheme is coming forward without significant overplanting. The Applicant recognises that the installed generating capacity of a solar farm will decline over time, but has responded to feedback received during the consultation process, particularly in line with the landscape-led design principle. This has reduced the land area upon which the Applicant proposes to install solar panels and limits overplanting for the Scheme. As set out in the **Statement of Need [EN010168/APP/7.1]** degradation of solar panels may mean that panels need to be replaced during the operational life of solar schemes. Other than in instances of the premature failure of individual panels (which would likely be replaced under a warranted maintenance arrangement) panel replacement is likely to be guided by data gathered through monitoring panel performance throughout the life of the solar scheme. This may be carried out on a rolling or programmed basis subject to any parameters which defined the assessment of the solar scheme's impacts on the environment.
Paragraph 2.10.56	AC installed export capacity should not be seen as an appropriate tool to constrain the impacts of a solar farm. Applicants should use other measurements, such as panel size, total area and percentage of ground cover to	**ES Volume 1, Chapter 4: Alternatives and Design Evolution ES [EN010168/APP/6.1]** and **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** set out the evolution of design, and the technology proposed for the Scheme.

Relevant Paragraph	Detail	Scheme Compliance
	set the maximum extent of development when determining the planning impacts of an application.	The Rochdale Envelope approach has been applied within the ES to ensure a robust assessment of the likely significant environmental effects of the Scheme. As discussed in **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]**, not all technical details have been determined at this stage and will not be until after the granting of the Development Consent Order (DCO). Therefore, the maximum (and where relevant, minimum) parameters for the elements where flexibility needs to be retained have been assessed. Further details of this are provided in Section 6.2 of **ES Volume 1, Chapter 6: EIA Methodology [EN010168/APP/6.1]**. Each technical chapter (**ES Volume 1, Chapter 7** to **Chapter 20 [EN010168/APP/6.1]**) describes the parameters applied in relation to the relevant assessment.
Site Layout Design, and Appearance		
Paragraph 2.10.60	As set out above applicants will consider several factors when considering the design and layout of sites, including proximity to available grid capacity to accommodate the scale of generation, orientation, topography, previous land–use, and ability to mitigate environmental impacts and flood risk.	**ES Volume 1, Chapter 4: Alternatives and Design Evolution** and **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3]** set out the factors the Applicant has taken into consideration when considering the selection, design and layout of the Site. This included the proximity to available grid capacity, orientation and irradiance, topography, previous land-use, and environmental

Relevant Paragraph	Detail	Scheme Compliance
		impacts such as those on landscape and visual, cultural heritage, ecology, and flood risk. As demonstrated in the **Design Approach Document [EN010168/APP/7.3]**, the design of the Scheme has evolved in response to the outcomes of environmental assessment, stakeholder engagement, consultation feedback at non-statutory, statutory and targeted consultation, and technical studies, within a framework provided by a Design Vision and Design Principles which have sought to minimise adverse impacts, enhance opportunities, and balance flexibility and certainty in the DCO application.
Paragraph 2.10.61	For a solar farm to generate electricity efficiently the panel array spacing should seek to maximise the potential power output of the site. The type, spacing and aspect of panel arrays will depend on the physical characteristics of the site such as site elevation.	The Scheme has sought to maximise efficient use of land. As set out in **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]**, the Applicant retains flexibility in the use of Tracker Solar PV Tables or Fixed Solar PV Tables for the Scheme. The Tracking Panels would be aligned in north-south rows and would rotate to the east and west to maximise output, whereas the Fixed Panels would be aligned in east-west rows and secured to fixed south facing Solar PV Tables. As set out in **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]**, a tracker system involves attaching the Solar PV Panels to a motorised table that can move in relation to the sun. This allows for optimal power generation throughout the day. The Scheme would utilise a single-axis tracker system which tilts the

Relevant Paragraph	Detail	Scheme Compliance
		Solar PV Panels around a horizontal north-south axis thus tracking the movement of the sun from east to west. Fixed south facing Solar PV Panels are the most common approach for ground mounted solar PV facilities in the UK to date and involve installing Solar PV Panels to fixed tables, arranged in rows facing south. Fixed south facing Solar PV Panels may be utilised at an individual field level where practical and/or environmental constraints prevent the use of Tracking Solar PV Tables.
Paragraph 2.10.62	In terms of design and layout, applicants may favour a south-facing arrangement of panels to maximise output although other orientations may be chosen. 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.	As set out in **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]**, the Applicant retains flexibility in the use of Tracker Solar PV Tables or Fixed Solar PV Tables for the Scheme. The Tracking Panels would be aligned in north-south rows and would rotate to the east and west to maximise output, whereas the Fixed Panels would be aligned in east-west rows and secured to fixed south facing Solar PV Tables. As set out in **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]**, a tracker system involves attaching the Solar PV Panels to a motorised table that can move in relation to the sun. This allows for optimal power generation throughout the day. The Scheme would utilise a single-axis tracker system which tilts the Solar PV Panels around a horizontal north-south axis thus tracking the movement of the sun from east to west.

Relevant Paragraph	Detail	Scheme Compliance
		Fixed south facing Solar PV Panels are the most common approach for ground mounted solar PV facilities in the UK to date and involve installing Solar PV Panels to fixed tables, arranged in rows facing south. Fixed south facing Solar PV Panels may be utilised at an individual field level where practical and/or environmental constraints prevent the use of Tracking Solar PV Tables.
Paragraph 2.10.63	It is likely that underground and overhead cabling will be required to connect the electrical assets of the site, such as from the substation to the panel arrays or storage facilities.	The Scheme does not include overhead cables during the construction or operation and maintenance of the Scheme. **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** Section 3.3 provides full details on the cabling required to connect the electrical assets of the Scheme. Cabling between PV modules will typically be above ground level along a row of Solar PV Tables, fixed to the Solar PV Mounting Structures, and then underground between the rows and to the Conversion Units and 33 kV Sub-distribution Switch Rooms. Additional low voltage auxiliary cabling would supply the CCTV and monitoring equipment. In identified archaeologically sensitive areas, cables will be installed to avoid or minimise disturbance below ground level. The **Grid Connection Statement [EN010168/APP/7.5]** sets out that the Applicant has secured a connection offer from National Grid Electricity System Operator Limited to connect the

Relevant Paragraph	Detail	Scheme Compliance
		Scheme to the National Electricity Transmission System at the National Grid Melksham Substation.
Paragraph 2.10.64	In the case of underground cabling, applicants are expected to provide a method statement describing cable trench design, installation methodology, as well as details of the operation and maintenance regime.	Details of cables and trenches required in the construction, operation and maintenance phases is provided in **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]**. The **Design Principles and Parameters Document [EN010168/APP/7.4]** sets out further detail on the cable design and installation for each of the works areas listed in Schedule 1 of the **Draft DCO [EN010168/APP/3.1]**. Grid connection cables (connecting the Solar PV Sites to the Melksham substation) would be constructed in open cut cable trenches will be approximately 1.7 m wide in a trench up to 2 m deep. Interconnecting cables (the Conversion Units, 33 kV Sub-distribution Switch Rooms, 132 kV Substations, 400 kV Substation and the Solar PV Sites would be connected with 33 kV to 132 kV Interconnecting Cables) would be constructed in open cut cable trenches up to approximately 1 to 7 m wide. This includes separation distances where multiple cables are running in parallel. The depth of the trench will be up to 2 m. **ES Volume 3, Appendix 3-2: Cable Route Construction Method Statement [EN010168/APP/6.3]** provides details of how the cable route corridor is to be constructed and has informed the EIA. **ES Volume 3, Appendix 3-2 Cable Route Construction Method Statement**

Relevant Paragraph	Detail	Scheme Compliance
		[EN010168/APP/6.3] sets out that the start and end points of the different construction methods (being open trench and trenchless technologies) for the whole of the 22 km route will not be confirmed until the detailed design stage. Therefore, the approach to the EIA is: 1) to commit to 'Avoidance Areas' where the cable installation method will use trenchless technologies rather than open cut trenches; 2) assess a reasonable 'worst case scenario' that considers both the open trench and Horizontal Directional Drilling methods. **ES Volume 3, Appendix 3-2 Cable Route Construction Method Statement [EN010168/APP/6.3]** sets out activities to be undertaken during construction to install the cables and the measures for the management of spoil, as set out in the **Outline Soil Resources Management Plan [EN010168/APP/7.15]**. Illustrative cross sections are also presented for the grid connection cable, the interconnecting cables and the HDD launch pit.
Project Lifetime		
Paragraph 2.10.65	Applicants should consider the design life of solar panel efficiency over time when determining the period for which consent is required. An upper limit of 40 years is typical, although applicants may seek consent without a time-period or for differing time-periods of operation.	As stated in Section 3.5 of **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1],** the operational lifetime of the Scheme is 60 years from the date of final commissioning.
Paragraph 2.10.66	Time limited consent, where granted, is described as temporary because there is a finite period for which it	The Applicant is seeking consent for a temporary 60-year operational period for the Scheme.

Relevant Paragraph	Detail	Scheme Compliance
	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.	Decommissioning is expected to occur after the 60-year design life of the Scheme in 2089. It is expected to take between 12 and 24 months and will be carried out in phases. See Schedule 1 of the **Draft DCO [EN010168/APP/3.1]** for further details of the consent being sought.
Paragraph 2.10.147	Where the consent for a solar farm is to be time-limited, the DCO should impose a requirement setting that time-limit from the date the solar farm starts to generate electricity.	A requirement to decommission the Scheme after the 60-year design life of the Scheme in 2089 is secured via a Requirement in Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**. An **Outline Decommissioning Strategy [EN010168/APP/7.14]** has been prepared as part of the EIA and submitted with the DCO Application. Decommissioning would be prepared substantially in accordance with the Outline Decommissioning Strategy and agreed with relevant authorities at the time of decommissioning.
Paragraph 2.10.149	An upper limit of 40 years is typical, although applicants may seek consent without a time period or for differing time-periods for operation.	The Applicant is seeking consent for a temporary 60-year operational period for the Scheme. Decommissioning is expected to occur after the 60-year design life of the in 2089. See Schedule 1 of the **Draft DCO [EN010168/APP/3.1]** for further details of the consent being sought.
Paragraph 2.10.150	The time limited nature of the solar farm, where a time limit is sought as a condition of consent, is likely to be an important consideration for the Secretary of State.	The Applicant is seeking consent for a temporary 60-year operational period for the Scheme. Decommissioning is expected to occur after the 60-year design life of the in 2089. See Schedule 1 of the **Draft DCO [EN010168/APP/3.1]** for further details of the consent being sought.

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 2.10.151	The Secretary of State should consider the period of time the applicant is seeking to operate the generating station, as well as the extent to which the site will return to its original state, when assessing impacts such as landscape and visual effects and potential effects on the settings of heritage assets and nationally designated landscapes.	As detailed in **ES Volume 3, Chapter 3: The Scheme [EN010168/APP/6.1]** the Solar PV Sites would be decommissioned with the land restored to its original use and condition as far as practicable and returned to the landowner. All Solar PV Panels, mounting piles, cabling, inverters, transformers, switchgear, BESS and substations would be removed from within the Solar PV Sites and recycled or disposed of in accordance with good practice and market conditions at that time. Post-decommissioning, the landowners would choose how the land is to be used and managed. **ES Volume 3, Chapter 3: The Scheme [EN010168/APP/6.1]** also sets out the in the Cable Route Corridor, the current most environmentally acceptable option is considered to be leaving the cables in situ, as this avoids disturbance to overlying land and habitats and to neighbouring communities. **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** considers the effects on landscape and visual receptors during construction, operation and maintenance and decommissioning of the Scheme. There are landscape and visual effects during construction of the Scheme, however these reduce over time as mitigation measures, in the form of planting and screening, mature. **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** and its accompanying appendices sets out the assessment of the Scheme's

Relevant Paragraph	Detail	Scheme Compliance
		impact on the historic environment, in line with the assessment criteria required by the NPSs and other relevant policy and legislation. The impact on each asset, and the relevant embedded and additional mitigation measures are set out in full within **ES Volume 3, Appendix 12-8: Cultural Heritage Impact Assessment Tables [EN010168/APP/6.3]**. With embedded mitigation, no significant effects are anticipated in relation to conservation areas, registered parks and gardens, or scheduled monuments during each phase of the Scheme. **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** concludes that for designated assets, with embedded mitigation, no significant adverse effects are anticipated for each phase of the Scheme, although non-significant effects are expected in relation to some assets. For non-designated heritage assets, with embedded mitigation, no significant adverse effects are anticipated for each phase of the Scheme. Significant adverse effects, in the absence of additional mitigation, have been identified for 17 archaeological assets. However, following application of additional mitigation, the residual effect would be reduced to negligible, which is not significant.
Decommissioning		

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 2.10.69	Applicants should set out what would be decommissioned and removed from the site at the end of the operational life of the generating station, considering instances where it may be less harmful for the ecology of the site to keep or retain certain types of infrastructure, for example underground cabling, and where there may be socio-economic benefits in retaining site infrastructure after the operational life, such as retaining pathways through the site or a site substation.	As set out in **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1],** decommissioning is expected to take between 12 and 24 months and will be undertaken in phases, and for the purposes of the assessment is expected to occur after the 60-year design life of the Scheme in 2089. The **Outline Decommissioning Strategy [EN010168/APP/7.14]** sets out the general principles to be followed in the decommissioning phase of the Scheme. The **Draft DCO [EN010168/APP/3.1]** includes a Requirement that a detailed Decommissioning Strategy would be prepared substantially in accordance with the **Outline Decommissioning Strategy [EN010168/APP/7.14]** and approved by the relevant authorities at that time of decommissioning, in advance of the commencement of decommissioning works, and would include timescales and transportation methods. The detailed Decommissioning Strategy would ensure that decommissioning was undertaken safely and with regard to the environmental legislation at the time of decommissioning, including relevant waste legislation. When the operation and maintenance phase ends, the Solar PV Sites would be decommissioned and the land returned to its original use and condition as far as practicable and returned to the landowner. All Solar PV Panels, mounting piles, cabling, inverters, transformers, switchgear, BESS Area, substations and
Paragraph 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).	

Relevant Paragraph	Detail	Scheme Compliance
		access tracks would be removed from within the Solar PV Sites and recycled or disposed of in accordance with good practice and market conditions at that time. This will include the areas of agricultural land where the soil health, quality and structure may have improved, and the established habitats. Foundations and other below ground infrastructure will be cut to 1.2 m below the surface to enable future ploughing. Any piles would be removed. Post-decommissioning, the landowners would choose how the land is to be used and managed, the landowner may return all of the land to arable use, although it is likely that established habitats such as hedgerows and woodland would be retained given their potential benefits to agricultural land and the wider farming estate. Permissive paths would be removed during decommissioning, with the precise timing to be determined by the contractor(s) and communicated to Wiltshire Council in accordance with the **Outline Decommissioning Strategy [EN010168/APP/7.14]**. The mode of removing the Interconnecting Cables and Grid Connection Cables decommissioning would be dependent upon government policy and good practice at that time. Currently, the most environmentally acceptable option is considered to be leaving the cables in situ, as this avoids disturbance to overlying land and habitats and to neighbouring communities.

Relevant Paragraph	Detail	Scheme Compliance
		Alternatively, the cables can be removed by opening up the ground at regular intervals and pulling the cable through to the extraction point, leaving the ducting and jointing bays in place, avoiding the need to open up the entire length of the cable route. The impact assessment is based on the worst-case parameters for each technical topic. Some soil profiling may be required, and the land will be contoured in agreement with the landowner and in accordance with the **Outline Decommissioning Strategy [EN010168/APP/7.14]**, approximately similar to the current topography. Excavations will be backfilled, using appropriate imported soil if required, otherwise with soil sourced on site, using appropriate soil management techniques as set out in Decommissioning Strategy. Areas where grass does not exist because of the footprint of the previous infrastructure (e.g. the BESS Area and onsite substations) shall be reseeded with suitable native species, in liaison with the landowner and in accordance with the Decommissioning Strategy, in order to integrate the newly restored soil into agricultural use. All work to the Existing National Grid Melksham Substation would remain under National Grid's control. Details with regard to this can be found in the **Grid Connection Statement [EN010168/APP/7.5].**

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 2.10.148	Such a requirement should also secure the decommissioning of the generating station after the expiration of its permitted operation to ensure that inoperative plant is removed after its operational life.	A requirement to decommission the Scheme after the expiration of its permitted operation is secured via a Requirement in Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**. A detailed Decommissioning Strategy would be prepared substantially in accordance with the **Outline Decommissioning Strategy [EN010168/APP/7.14]** and agreed with relevant authorities at the time of decommissioning.
Flexibility in the Project Details		
Paragraph 2.10.70	In many cases, not all aspects of the proposal may have been settled in precise detail at the point of application. Such aspects may include: • the type, number and dimensions of the panels; • 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).	The Applicant wishes to retain flexibility in the design of the Scheme at the time of submission so that the detailed design of the Scheme can be informed by technical considerations, post-consent work, and take advantage of innovation in technology. The extent of the flexibility is detailed in **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** and set out in the **Design Principles and Parameters [EN010168/APP/7.4]** and **Design Approach Document [EN101068/APP/7.3]**. Aspects of the Scheme that require design flexibility include, but are not limited to, the arrangement of the: • Solar PV Panels and panel type/specification; • Conversion Units/33 kV Sub-distribution Switch Rooms;

Relevant Paragraph	Detail	Scheme Compliance
		• Associated Development such as the BESS Area and Substations; and • Grid Connection Cables and Interconnecting Cables, i.e the routing of the cables within the Cable Route Cable.
Biodiversity, Ecological, Geological Conservation and Water Management		
Paragraph 2.10.76	The applicant's ecological assessments should identify any ecological risk from developing on the proposed site.	**ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** provides an assessment of the likely significant effects on ecology and biodiversity as a result of the Scheme, including ecological habitats and species. It concludes that following the implementation of embedded and additional mitigation, no significant effects are identified on any statutory or non-statutory sites designated for nature conservation. However, following additional mitigation outlined in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** significant effects are anticipated on hedgerows within the Cable Route Corridor through temporary loss of habitat, and breeding birds through displacement of ground nesting birds from Solar PV Sites. However, the residual significant adverse effects are limited to site and local level and are far outweighed by the residual significant beneficial effects anticipated in relation to habitats and other species, together with the overwhelming need for and other benefits of the Scheme.

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 2.10.77	Issues that need assessment may include habitats, ground nesting birds, wintering and migratory birds, bats, dormice, reptiles, great crested newts, water voles and badgers.	Section 9.10 of **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** includes an assessment of the likely significant effects on habitats, ground nesting birds, wintering and migratory birds, bats, dormice, reptiles, great crested newts, water voles and badgers. It concludes that following additional mitigation outlined in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** significant effects are anticipated on breeding birds through displacement of ground nesting birds from Solar PV Sites. However, the residual significant adverse effects are limited to site and local level and are far outweighed by the residual significant beneficial effects anticipated in relation to habitats and other species, together with the overwhelming need for and other benefits of the Scheme.
Paragraph 2.10.78	The applicant should use an advising ecologist during the design process to ensure that adverse impacts are avoided, minimised or mitigated in line with the mitigation hierarchy, and biodiversity enhancements are maximised.	The assessment set out in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** has been undertaken by competent ecologists. The design process set out in the **Design Approach Document [EN010168/APP/7.3]** has been informed by the outcomes of environmental assessment (amongst other factors), including competent ecologists, which led to the adoption of design principles to mitigate and enhance ecology and biodiversity. This includes design principles that: • Ensure adherence to the mitigation hierarchy to reduce impacts and control any adverse effects

Relevant Paragraph	Detail	Scheme Compliance
		on the environment throughout the lifecycle of the Scheme from construction through to operation and maintenance and decommissioning. • Deliver a minimum of 10% net gain for biodiversity through strategic habitat creation and enhancement measures. • Sensitivity to existing land uses where practicable and maximising opportunities to strengthen green and blue infrastructure.
Paragraph 2.10.79	The assessment may be informed by a 'desk study' of existing ecological records, an evaluation of the likely impacts of the solar farm upon ecological features, and should specify mitigation to avoid or minimise these impacts, and any further surveys required.	Section 9.6 of in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** sets out the assessment methodology used to inform the assessment. This includes both a desk study and field evaluation. The evaluation of likely impacts of the Scheme on ecological features is set out in Section 9.10 of in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** while embedded mitigation is set out in Section 9.9 and additional mitigation is set out in Section 9.12. Following the implementation of this embedded and additional mitigation, which is also detailed in the **Outline EPMS [EN010168/APP/7.19]** secured through Requirement 8 under Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**, it is concluded that significant effects are anticipated in relation to: • Hedgerows within the Cable Route Corridor, where it is anticipated there will be temporary loss of habitat. However, the residual significant

Relevant Paragraph	Detail	Scheme Compliance
		adverse effect is short term in nature and limited to a local level; and • Breeding birds – ground nesting birds of open habitats, where it anticipated there will be displacement of ground nesting birds from the Solar PV Sites. This is assessed to result in a residual significant adverse effect at local level for skylark, and a residual significant adverse effect at site level for yellow wagtail, corn bunting, grey partridge and quail. Despite this, the residual significant adverse effects of the Scheme relating to ecology and biodiversity are limited to site and local level and are far outweighed by the residual significant beneficial effects of the Scheme anticipated in relation to habitats and other species, together with the overwhelming need for and other benefits of the Scheme (as outlined in the **Statement of Need [EN010168/APP/7.1]**).
Paragraph 2.10.80	Applicants should consider earthworks associated with construction compounds, access roads and cable trenching.	**ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** provides details on the works required for construction, including installation of cables, construction compounds and access roads which may require earthworks.
Paragraph 2.10.81	Where soil stripping occurs, topsoil and subsoil should be stripped, stored, and replaced separately to minimise soil damage and to provide optimal conditions for site restoration. Further details on minimising	The **Outline Soil Resources Management Plan [EN010168/APP/7.15]** sets out details of how the soils will be managed and protected during the construction, operation and maintenance and decommissioning of the Scheme. This includes soil handling methods

Relevant Paragraph	Detail	Scheme Compliance
	impacts on soil and soil handling are above at paragraphs 2.10.33 and 2.10.34.	including soil stripping methods, soil moisture conditions for handling, preparatory works, topsoil stripping methods and subsoil stripping methods. Stockpiling, reinstatement methods, and monitoring procedures during construction are also set out. A detailed Soil Resources Management Plan will be secured by a requirement in the **Draft DCO [EN010168/APP/3.1].**
Paragraph 2.10.82	Applicants should consider how security and lighting installations may impact on the local ecology. Where pole mounted CCTV facilities are proposed the location of these facilities should be carefully considered to minimise impact. If lighting is necessary, it should be minimised and directed away from areas of likely habitat.	Section 9.10 of **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** has assessed the impacts on lighting on local ecology. No artificial lighting is considered likely to be required during construction outside of the winter months, however, during winter, artificial lighting may be required within the construction zone due to the short day lengths. Embedded mitigation measures include buffer zones around trees and buildings identified as being suitable for roosting bats, which are proportionately sized to the suitability of the tree, and also buffer zones from the most valuable foraging and commuting habitats such as hedgerows, woodland and watercourses. Additionally, a sensitive lighting strategy will be implemented, as detailed in the **Outline EPMS [EN010168/APP/7.19]**, whereby all artificial lighting is installed to minimise limit light spill on any habitats outside of the immediate working area. No significant effects are anticipated on ecology as a result of security and lighting.

Relevant Paragraph	Detail	Scheme Compliance
		The security, lighting and CCTV proposed as part of the Scheme is set out in **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** and managed through the **Outline CEMP [EN010168/APP/7.12]**, **Outline OEMP [EN010168/APP/7.13]**, and the **Outline Decommissioning Strategy [EN010168/APP/7/14]**. These measures will be secured through Requirements under Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**.
Paragraph 2.10.83	Applicants should consider how site boundaries are managed. If any hedges/scrub are to be removed, further surveys may be necessary to account for impacts. Buffer strips between perimeter fencing and hedges may be proposed, and the construction and design of any fencing should account for enabling mammal, reptile and other fauna access into the site if required to do so in the ecological report.	Consideration of site boundaries is included in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**. Buffers are incorporated in the Scheme design, including 15 m minimum from all woodland, hedgerows, lines of trees, and designated sites, as well as some minor watercourses depending on their ecological value. **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** concludes that significant effects are anticipated to hedgerows within the Cable Route Corridor, where it is anticipated there will be temporary loss of habitat. However, the residual significant adverse effect is short term in nature and limited to a local level. Further, significant long term beneficial effects of the Scheme at local level relating to hedgerow and woodland habitats (as discussed in the previous section) are anticipated as a result of the proposed hedgerow, woodland and tree planting outlined in the **Outline LEMP [EN010168/APP/7.18]**

Relevant Paragraph	Detail	Scheme Compliance
		secured through Requirement 7 under Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**.
Paragraph 2.10.84	Where a Flood Risk Assessment has been carried out this must be submitted alongside the applicant's ES. This will need to consider the impact of drainage. As solar PV panels will drain to the existing ground, the impact will not, in general, be significant.	A Flood Risk Assessment has been undertaken and set out in **ES Volume 3, Appendix 11-1 to 11-9: FRA and Drainage Strategy [EN010168/APP/6.3]**. **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** has been informed by the FRA and Drainage Strategy (see **ES Volume 3, Appendices 11-1 to 11-9 [EN010168/APP/6.3]**) and assesses the likely impacts and effects of the Scheme in relation to hydrology, flood risk and drainage for the whole lifecycle of the development. It concludes that with embedded and additional mitigation, in addition to the measures described in the **Outline CEMP [EN010168/APP/7.12]** and **Outline Decommissioning Strategy [EN010168/APP/7.14]**, no significant residual effects are anticipated. The two forms of additional mitigation proposed are intended to address the potential for the pollution of surface water runoff in the case of a battery fire, and to provide a temporary drainage system for the construction stage to address the temporary increase in impermeable construction areas such as around the substation and BESS Area. These measures will be secured through Requirements under Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**.
Paragraph 2.10.85	Where access tracks need to be provided, permeable tracks should be used, and localised Sustainable Drainage Systems (SuDS), such as swales and	**ES Volume 1, Chapter 11 Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** sets out that access tracks will be constructed at existing ground

Relevant Paragraph	Detail	Scheme Compliance
	infiltration trenches, should be used to control any run-off where recommended.	level using granular permeable materials such as gravel. Section 11.9 of **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** details the embedded mitigation including the use of permeable surfacing for access and retention of vegetation across panelled areas. These features reduce runoff generation and help preserve existing drainage patterns across the Site. The assessment concludes that following the implementation of embedded mitigation and any additional good practice measures during construction and operation, all residual effects are considered to be of negligible significance and not significance in EIA terms.
Paragraph 2.10.86	Given the temporary nature of solar PV farms, sites should be configured or selected to avoid the need to impact on existing drainage systems and watercourses.	The Site has been designed to avoid impacts on existing drainage patterns. Section 11.9 of **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** details, in Section 11.9, the embedded mitigation including the use of permeable surfacing for access and retention of vegetation across panelled areas. These features reduce runoff generation and help preserve existing drainage patterns across the Site. These measures will be managed through the measures set out in the **Outline CEMP [EN010168/APP/7.12]** and **Outline OEMP [EN010168/APP/7.13],** of which detailed versions will be secured under requirements 13 and 14 under Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**.

Relevant Paragraph	Detail	Scheme Compliance
		ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] concludes that following the implementation of the embedded mitigation measures and any additional good practice measures during construction and operation, all residual effects are considered to be of negligible significance and not significant in EIA terms.
Paragraph 2.10.87	Culverting existing watercourses/drainage ditches should be avoided.	**ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** sets out that open-span bridges are preferred over culverts, and abutments will be minimal and offset by at least 1m from the bank top.
Paragraph 2.10.88	Where culverting for access is unavoidable, applicants should demonstrate that no reasonable alternatives exist and where necessary it will only be in place temporarily for the construction period.	As set out in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1],** open-span bridges are preferred over culverts.
Paragraph 2.10.89	Solar farms have the potential to increase the biodiversity value of a site, especially if the land was previously intensively managed. In some instances, this can result in significant benefits and enhancements beyond Biodiversity Net Gain, which result in wider environmental gains which is encouraged.	The Scheme will deliver, as a minimum, 10% BNG, which is secured via Requirement 9 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**. The **BNG Assessment Report [EN010168/APP/7.8]** indicates that BNG in excess of 10% will be achieved, with a total net gain of 63.80% for area habitat units, 19.35% for hedgerow units and 25.30% for watercourse units in relation to the Solar PV Sites. The total net gain for the whole Scheme (i.e. Solar PV Sites and Cable Route Corridor combined) is 34.75% for area habitat units, 12.31% for hedgerow units and 20.08% for watercourse units, as set out in the **BNG Assessment**

Relevant Paragraph	Detail	Scheme Compliance
		Report [EN010168/APP/7.8]. This demonstrates the Scheme achieves biodiversity net gain on site. As set out in **ES Volume 2, Figure 3-1 Indicative Site Layout Plan [EN010168/APP/6.2], ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2], ES Volume 1, Chapters 8: Landscape and Visual [EN010168/APP/6.1] and 9: Ecology and Biodiversity [EN010168/APP/6.1]**, and the **Outline LEMP [EN010168/APP/7.18]**, the Scheme proposes to deliver substantial new hedgerow and tree planting, reinforcement planting at existing hedgerows and field boundaries, extensive grassland habitat creation and sympathetic management both within buffers and under the Solar PV arrays, as well as discrete, valuable habitat creation away from the Solar PV Panels. This includes connective woodland planting, mixed grassland/wildflower planting; enhanced riparian native planting; reinforced road-side screening; hedgerow reinforcement and enhancements to ponds. Further, the reversion of the arable fields which dominate the Solar PV Sites to grassland (for the lifetime of the Scheme) is considered likely to result in a significant beneficial effect by improving the extent and quality of grassland habitats within the Solar PV Sites which may provide supporting habitat for species. Beneficial effects to the soil may also be derived from the cessation of cultivation, chemical treatments and soil inputs.

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 2.10.90	For projects in England, applicants should consider enhancement, management, and monitoring of biodiversity in line with the ambition set out in the Environmental Improvement Plan and any relevant measures and targets, including statutory targets set under the Environment Act or elsewhere.	The Scheme will deliver, as a minimum, 10% BNG, which is secured via Requirement 9 in **Schedule 2 to the Draft DCO [EN010168/APP/3.1],** in accordance with the Environment Act. The **BNG Assessment Report [EN010168/APP/7.8]** indicates that BNG in excess of 10% will be achieved, with a total net gain of 63.80% for area habitat units, 19.35% for hedgerow units and 25.30% for watercourse units in relation to the Solar PV Sites. The total net gain for the whole Scheme (i.e. Solar PV Sites and Cable Route Corridor combined) is 34.75% for area habitat units, 12.31% for hedgerow units and 20.08% for watercourse units, as set out in the **BNG Assessment Report [EN010168/APP/7.8]**. Measures that deliver BNG are set out in the **Outline LEMP [EN010168/APP/7.18]**. This demonstrates the Scheme achieves biodiversity net gain on site.
Paragraph 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.	
Paragraph 2.10.129	This might include maintaining or extending existing habitats and potentially creating new important habitats, for example by installing cultivated strips/plots for rare arable plants, rough grassland margins, bumble bee plant mixes, and wild bird seed mixes.	The **Outline LEMP [EN010168/APP/7.18],** secured through Requirement 7 under Schedule 2 of the **Draft DCO [EN010168/APP/3.1],** sets out measures proposed to maintain, extend and create new habitats. These include extensive tree, woodland and hedgerow planting and creation of ponds.
Paragraph 2.10.130	Applicants are advised to develop an ecological monitoring programme to monitor impacts upon the flora of the site and upon any particular ecological receptors (such as bats and wintering birds). Results of the monitoring will then inform any changes needed to	The Applicant will undertake monitoring during construction, operation and decommissioning as set out in the **Outline LEMP [EN010168/APP/7.18]**, **Outline CEMP [EN010168/APP/7.12]**, **Outline OEMP [EN010168/APP/7.13]**, and the **Outline Decommissioning Strategy [EN010168/APP/7.14]**.

Relevant Paragraph	Detail	Scheme Compliance
	the land management of the site, including, if appropriate, any livestock grazing regime.	These measures will be secured through Requirements under Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**. Ecological monitoring, specifically, is detailed in the **Outline LEMP [EN010168/APP/7.18]** to be secured by Requirement 7 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].**
Paragraph 2.10.154	Water management is a critical component of site design for ground mount solar plants. Where previous management of the site has involved intensive agricultural practice, solar sites can deliver significant ecosystem services value in the form of drainage, flood attenuation, natural wetland habitat, and water quality management.	**ES Appendix 11-1 to 11-9: FRA and Drainage Strategy [EN010168/APP/6.3]** details how water and drainage will be managed as part of the Scheme. **ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]** outlines how the Scheme may result in beneficial effects to soils by leaving the land undisturbed under long-term grassland. Soil health, quality and structure within the Solar PV Sites are likely to improve during the lifetime of the scheme.
Landscape, Visual and Residential Amenity		
Paragraph 2.10.94	The approach to assessing cumulative landscape and visual impact of large-scale solar farms is likely to be the same as assessing other onshore energy infrastructure. Solar farms are likely to be in low lying areas of good exposure and as such may have a wider zone of visual influence than other types of onshore energy infrastructure.	**ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** presents an assessment of the Scheme's impact on the existing landscape character and its potential visual effects. **ES Volume 3, Appendix 8-1: LVIA Methodology [EN010168/APP/6.3]** includes a full detailed LVIA methodology, which has informed **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]**. This is in general accordance with the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition, 2013 (LVIA).
Paragraph 2.10.95	However, whilst it may be the case that the development covers a significant surface area, in the case of ground-mounted solar panels it should be noted that with effective screening and appropriate land	

Relevant Paragraph	Detail	Scheme Compliance
	topography, the area of a zone of visual influence could be appropriately minimised.	**ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** sets out how landscape and visual impacts have been minimised as far as practicable. Through the application of good design principles including the application of the mitigation hierarchy, a robust approach to secure good design would be achieved. The Applicant has undertaken an iterative design process which responds to policy requirements set out in NPS EN-1 and NPS EN-3, published landscape character assessments and fieldwork analysis, desk studies, detailed fieldwork analysis and having regard to feedback from non-statutory, statutory and targeted consultation responses, in order to minimise harm to the landscape and reduce the visual effects of the Scheme. This has been achieved by balancing the need to generate a large amount of renewable energy, whilst responding to the local context and integrating the Scheme into its landscape setting, in accordance with national and local planning policies. As described in **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** an extensive range of mitigation and enhancement measures are proposed as part of the Scheme which reduce the landscape and visual effects of the Scheme as far as practicable. With mitigation in place, **ES Volume 1, Chapter 8: Landscape and Visual**
Paragraph 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 preapplication process.	
Paragraph 2.10.97	Applicants should carry out a landscape and visual assessment and report it in the ES. Visualisations may be required to demonstrate the effects of a proposed solar farm on the setting of heritage assets and any nearby residential areas or viewpoints.	
Paragraph 2.10.98	Applicants should follow the criteria for good design set out in Section 4.7 of EN-1 when developing projects and will be expected to direct considerable effort towards minimising the landscape and visual impact of solar PV arrays especially within nationally designated landscapes.	

Relevant Paragraph	Detail	Scheme Compliance
		[EN010168/APP/6.1] concludes that in relation to visual effects, significant visual effects would be experienced by 9 private receptors during construction and at Year 1 Operation. These significant effects would fall away in Operation Year 15 and at decommissioning once landscaping has become established. For public receptors during each phase of the Scheme, **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** concludes that during construction and at Operation Year 1, 27 public receptors would experience significant visual effects. As planting matures, at Operation – Year 15 and at decommissioning, significant effects would be reduced to 10 affected public receptors. For transport receptors, **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** confirms that during construction significant visual effects would occur to 12 transport receptors, reducing to 11 receptors during Year 1 of operation and no significant visual effects occurring during operation at Year 15 or during decommissioning. In terms of visual effects in the Cable Route Corridor, 6 significant effects would occur to private receptors during construction and to 7 public receptors as set out in **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]**. These receptors are located close to the Cable Route Corridor and would experience a change in views and visual amenity. No significant visual effects within the Cable Route Corridor Study Area would occur during operation (Year 1 or Year 15) or decommissioning.

Relevant Paragraph	Detail	Scheme Compliance
		It should be noted that where significant long-term effects on public receptors remain at Year 15, this is primarily because mitigation is not proposed as it would not be appropriate to the long-term landscape character and the legacy landscape. For example, where footpaths diagonally cross fields, new hedgerows to screen views of infrastructure would not be consistent with the regular pattern of fields which is characteristic of the existing landscape. Other instances of significant long-term visual effects on Public Receptors relate to the local topography where there are views from higher ground to infrastructure which cannot be fully alleviated by mitigation. **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** includes the effects on landscape and visual receptors during construction, operation (at Year 1 and Year 15) and decommissioning. Further, **ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswold National Landscape and its Special Qualities [EN010168/APP/6.3]** provides a standalone assessment of the effects of the Scheme on the Cotswolds National Landscape (CNL) and its Special Qualities. The landscape and visual effects of the Scheme on the CNL and its Special Qualities have been mitigated throughout the landscape led, iterative design process that has been undertaken which has been informed by the Cotswold Nature Recovery Plan

Relevant Paragraph	Detail	Scheme Compliance
		and in consultation with officers at the CNL and Wiltshire Council. Embedded mitigation measures relating to the CNL include: • avoidance measures through the use of significant buffers for areas of the Scheme within the setting of the CNL and to maintain views. • protection of the existing landscape through buffers and offsets. • Retention and enhancement of the existing landscape framework including new planting and the re-establishment of historic hedgerows within the setting of the CNL, new areas of native woodland, trees, scrub and grassland, new planting within riparian corridors to enhance rivers and wetland, as well the restoration of dry-stone walls and creation of new ponds. • Positive enhancements to further the purpose of the CNL including, the creation of wildflower meadows, wildflower meadow verges and maintaining hedgerows at their current height to maintain open view of the landscape. **ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswold National Landscape and its Special Qualities [EN010168/APP/6.3]** concludes that there are no significant direct effects on the CNL or its Special Qualities. It is considered that these measures are sufficient, appropriate and proportionate to the scale of the Scheme.

Relevant Paragraph	Detail	Scheme Compliance
		The **Design Approach Document [EN010168/APP/7.3]** explains how the Applicant has delivered good design. The design of the Scheme is 'Landscape Led' and due weight has been given to the intrinsic character and beauty of the surrounding area. The landscape-led approach is reflected in the design principles which have provided a framework for design evolution in order to deliver positive design outcomes.
Paragraph 2.10.99	Whilst there is an acknowledged need to ensure solar PV installations are adequately secured, required security measures such as fencing should consider the need to minimise the impact on the landscape and visual impact (see paragraphs 2.10.46 – 2.10.48 above).	As stated in **ES Volume 1, Chapter 8: Landscape and Visual Impact [EN010168/APP/6.1]** the design includes security fencing placed along the perimeter boundary of the Sites. Areas between the fencing and the developable area were then made available for ecology and landscape mitigation or enhancement. Embedded Mitigation has been co-ordinated with relevant disciplines, such as landscape, cultural heritage and ecology. Regarding ecology, the aim was to determine the key embedded and parameters and agree offsets to improve the value of the landscape and reflect appropriate local and regional aims and objectives for ecology and biodiversity. The **Outline LEMP [EN010168/APP/7.18]** sets out a framework for the establishment of the planting on site for the duration of the Scheme; together with the management and monitoring of the landscape and ecological mitigation and enhancement of habitats on which this framework is based. The **Outline LEMP [EN010168/APP/7.18]** is secured by a requirement in the **Draft DCO [EN010168/APP/3.1]**.

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 2.10.100	The applicant should consider as part of the design, layout, construction, and future maintenance plans how to protect and retain, wherever possible, the growth of vegetation on site boundaries, as well as the growth of existing hedges, established vegetation, including mature trees within boundaries. Applicants should also consider opportunities for individual trees within the boundaries to grow on to maturity.	The **Outline LEMP [EN010168/APP/7.18]** sets out a framework for the establishment of the planting on site for the duration of the Scheme; together with the management and monitoring of the landscape and ecological mitigation and enhancement of habitats on which this framework is based. The overarching aim of the **Outline LEMP [EN010168/APP/7.18]** is to set out prescriptions for habitat creation and management in order to provide ecological enhancements, strengthen the green infrastructure within the local area, and to provide landscape and visual mitigation through screening of the Scheme, where necessary. The **Outline LEMP [EN010168/APP/7.18]** is secured by a requirement in the **Draft DCO [EN010168/APP/3.1]**. As set out in **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** in relation to lighting: • Lighting is not required within the Solar Arrays for the operation and maintenance phase of the Scheme. Motion sensing security lighting will be provided within substations and within the BESS to be used only for maintenance and security purposes. • Temporary site lighting during construction will be required to enable safe working during construction and decommissioning during hours of darkness and will be designed as far as reasonably practicable to minimise potential for light spillage outside the Sites and Cable Route Corridor,
Paragraph 2.10.101	The impact of the proposed development on established trees and hedges should be informed by a tree survey and arboricultural/hedge assessment as appropriate.	
Paragraph 2.10.131	Applicants should consider the potential to mitigate landscape and visual impacts through, for example, screening with native hedges, trees and woodlands.	
Paragraph 2.10.132	Applicants should aim to minimise the use and height of security fencing. Where possible applicants should utilise existing features, such as hedges or landscaping, to assist in site security, or screen security fencing.	
Paragraph 2.10.133	Applicants should minimise the use of security lighting. Any lighting should utilise a passive infra-red (PIR) technology and should be designed and installed in a manner which minimises impact.	
Paragraph 2.10.157	The Secretary of State will consider the landscape and visual impact of any proposed solar PV farm, taking account of any sensitive visual receptors, and the effect of the development on landscape character, together with the possible cumulative effect with any existing or proposed development. Nationally designated	

Relevant Paragraph	Detail	Scheme Compliance
	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.	particularly towards houses, traffic and ecological habitats. • Standard good practice measures would be employed to minimise light spill, including glare during construction, operation and decommissioning. • There will be no lighting on perimeter fencing. These embedded mitigation and enhancement measures are incorporated into the Scheme as shown within **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** and **Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2],** which forms part of the **Outline LEMP [EN010168/APP/7.18]**. Requirement 7 of the **Draft DCO [EN010168/APP/3.1]** requires the submission and approval of a landscape and ecological management plan to be substantially in accordance with the **Outline LEMP [EN010168/APP/7.18]** and for the landscape and ecological management plan to be implemented as approved. These measures and controls will ensure that the detailed design of the Scheme incorporates the landscape mitigation and enhancements included within the **Outline LEMP [EN010168/APP/7.18]**.
Glint and Glare		
Paragraph 2.10.103	Applicants should map receptors qualitatively to identify potential glint and glare issues and determine if a glint	The Applicant has undertaken an assessment of the potential impacts of glint and glare as detailed within Section 20.5 of **ES Volume 1, Chapter 20: Other**

Relevant Paragraph	Detail	Scheme Compliance
	and glare assessment is necessary as part of the application.	**Environmental Matters [EN010168/APP/6.1]** that includes the impacts of glint and glare on residential receptors, roads and railway lines, aviation receptors, and PRoW users. **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** concludes that following implementation of embedded mitigation such as incorporating setbacks from dwelling receptors where practicable; committing to use of single axis tracking Solar PV Panels where required and implementing a resting angle of 5° (field C14); and committing to use of 2.5m 1P fixed south-facing panels where required (field B11), no significant effects are anticipated on any receptors as a result of the Scheme.
Paragraph 2.10.104	When a quantitative glint and glare assessment is necessary, applicants are expected to consider the geometric possibility of glint and glare affecting nearby receptors, and provide an assessment of potential impact and impairment based on the angle and duration of incidence and the intensity of the reflection.	The Applicant has undertaken an assessment of the potential impacts of glint and glare as detailed within **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]**. This includes the geometric possibility of glint and glare on nearby receptors and assessment of potential impact of impairment based on the angle and duration of incidence and the intensity of the reflection. 15 sensitive viewpoints were identified for geometric modelling. Full details of the viewpoint receptors are presented in **ES Volume 3, Appendix 20-4: Solar Photovoltaic Glint and Glare Study [EN010168/APP/6.3]**. The assessment of glint and glare in **ES Volume 1, Chapter 20: Other Environmental Matters**

Relevant Paragraph	Detail	Scheme Compliance
		[EN010168/APP/6.1] concludes that following implementation of embedded mitigation such as incorporating setbacks from dwelling receptors where practicable; committing to use of single axis tracking Solar PV Panels where required and implementing a resting angle of 5° (field C14); and committing to use of 2.5m 1P fixed south-facing panels where required (field B11), no significant effects are anticipated on any receptors.
Paragraph 2.10.105	The extent of reflectivity analysis required to assess potential impacts will depend on the specific project site and design. This may need to account for 'tracking' panels if they are proposed as these may cause differential diurnal and/or seasonal impacts.	The glint and glare assessment in **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** has taken into account impacts resulting from the Scheme's site and design. The Applicant has embedded mitigation into the Scheme design where necessary including: • Committing to use of single axis tracking Solar PV Panels where required and implementing a resting angle of 5º (field C14) as for a 0.3 km section of railway, solar reflections are predicted to occur within a train driver's primary field-of-view for fixed south facing panels and single axis tracking panels; and • Committing to of 2.5 m 1P fixed south-facing panels where required (field B11) as solar reflections are predicted to occur for more than three months per year but less than 60 minutes in any given day and the existing vegetation is not currently at a sufficient height to screen views from the ground floor of the dwelling of receptor 24.

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 2.10.106	When a glint and glare assessment is undertaken, the potential for solar PV panels, frames and supports to have a combined reflective quality may need to be assessed, although the glint and glare of the frames and supports is likely to be significantly less than the panels.	The Applicant has undertaken an assessment of the potential impacts of glint and glare as detailed within **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** that includes the impacts of glint and glare on residential receptors, roads and railway lines, aviation receptors, and PRoW users. The reflective quality of frames and supports has not been considered in the assessment. the solar panels themselves are the overriding source of specular reflections because they are large and flat. Reflections from frames and supports are far smaller and angular which means that the amount of specular reflections produced will be much less despite having higher reflectivity. In addition, the frames and supports are often not visible to an observer and/or from the sun, because they are removed from view by the panel face itself. Section 20.5.19 sets out that the Glint and Glare Assessment methodology is based on Pager Power's Glint and Glare Guidance (Fourth Edition), which was developed in line with information provided to Pager Power through consultation with stakeholders and by reviewing the available studies. This methodology has been used for other solar consented DCOs such as Sunnica Energy Farm, Cottam Solar Project and West Burton Solar Project. The assessment of glint and glare in **ES Volume 1, Chapter 20: Other Environmental Matters**

Relevant Paragraph	Detail	Scheme Compliance
		[EN010168/APP/6.1] concludes that, following the implementation of embedded mitigation measures, no significant residual effects are predicted.
Paragraph 2.10.134	Applicants should consider using, and in some cases the Secretary of State may require, solar panels to comprise of (or be covered with) anti-glare/anti-reflective coating with a specified angle of maximum reflection attenuation for the lifetime of the permission.	As set out in **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** the Solar PV panels will comprise two layers of toughened low reflectivity glass.
Paragraph 2.10.158	Solar PV panels are designed to absorb, not reflect, irradiation. However, the Secretary of State should assess the potential impact of glint and glare on nearby homes, motorists, public rights of way, and aviation infrastructure (including aircraft departure and arrival flight paths).	The assessment of the potential impacts of glint and glare as detailed within **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** includes the impacts of glint and glare on residential receptors, roads and railway lines, aviation receptors, and PRoW users. The assessment of glint and glare in **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** concludes that following implementation of embedded mitigation such as incorporating setbacks from dwelling receptors where practicable; committing to use of single axis tracking Solar PV Panels where required and implementing a resting angle of 5° (field C14); and committing to use of 2.5 m 1P fixed south-facing panels where required (field B11), no significant effects are anticipated on any receptors.
Paragraph 2.10.159	Whilst there is some evidence that glint and glare from solar farms can be experienced by pilots and air traffic controllers in certain conditions, there is no evidence	Section 20.1 of **ES Volume 1, Chapter 20: Other Environmental Matters [EN01068/APP/6.1]** and **ES Volume 3, Appendix 20-4: Solar Photovoltaic Glint**

Relevant Paragraph	Detail	Scheme Compliance
	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.	**and Glare Study [EN010168/APP/6.3]** provide an assessment of the likely effects of the Scheme on aviation. The following airfields were assessed: • Hullavington Airfield, approximately 1.1 km west; • Badminton Arfield, approximately 4.6 km west; • Langley House Airfield, approximately 5.2 km south; • Charlton Park Airfield, approximately 5.8 km northeast; and • Bowldown Farm Airfield, approximately 7 km northwest. Solar reflections are predicted towards the approach paths and visual circuits (specified paths to be flown by aircraft operating in the vicinity of an aerodrome) at Hullavington Airfield however it is understood that flying activity ceased at this airfield in 2016, and it is now permanently closed. Solar reflections with 'potential for temporary after-image' are predicted towards receptors on the visual circuits (specified paths to be flown by aircraft operating in the vicinity of an aerodrome) at Badminton Airfield. The effects have been considered in an operational context and are considered to be operationally accommodatable. The impact is therefore not considered to be significant, and no mitigation is required.

Relevant Paragraph	Detail	Scheme Compliance
		A low impact is also predicted towards aviation receptors associated with Langley House Airfield, Charlton Park Airfield and Bowldown Airfield, which are all beyond 5km from the Scheme. Detailed modelling has not been undertaken as it is considered that due to the distance between the Scheme and these airfields, and the runway configurations, effects are predicted to be a low impact. **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** includes aviation incidents in its assessment of potential impacts and the chapter concludes there would be no risks associated with an increased prevalence and/or severity of aviation incidents as a result of the Scheme and the effects are not significant. Accordingly, the Scheme does not interfere with aviation as a result of glint and glare effects.
Cultural Heritage		
Paragraph 2.10.107	The impacts of solar PV developments on the historic environment will require expert assessments in most cases and may have effect both above and below ground.	An assessment of the historic environment, including above and below ground assets is provided in **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]**. **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** concludes that following the implementation of embedded and additional mitigation measures there will be no residual significant effects

Relevant Paragraph	Detail	Scheme Compliance
		on any designated or non-designated assets as a result of the Scheme. Embedded mitigation measures such as removal of solar PV from fields due to heritage sensitivities, have reduced any potential significant adverse effects. During construction, there is the potential for permanent direct impacts to below ground assets such as archaeological remains, however following the implementation of mitigation measures, including an overarching Archaeological Mitigation Strategy (AMS), which includes the location and nature of the additional mitigation in the form of strip, map and sample excavation, archaeological monitoring and re-instatement of earthworks. no significant impacts are anticipated.
Paragraph 2.10.108	Above ground impacts may include the effects on the setting of Listed Buildings and other designated heritage assets as well as on Historic Landscape Character.	The assessment in **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** provides an assessment of the likely significant effects of the Scheme on the setting of above ground heritage assets including Conservation Areas, Listed Buildings, Registered Parks and Gardens and Scheduled Monuments, as well as Historic Landscape Character. **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** concludes that following the implementation of embedded and additional mitigation measures there will be no residual significant effects on the setting of any designated assets as a result of the Scheme. Embedded mitigation measures such as

Relevant Paragraph	Detail	Scheme Compliance
		removal of solar PV from fields due to heritage sensitivities, have reduced any potential significant adverse effects. **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** considers the historic landscape character. **ES Volume 3, Appendix 12-7: Historic Landscape Assessment [EN0101068/APP/6.3]** identifies the majority of the land within the Order Limits of the Scheme forms enclosed land characterised by post-medieval and modern land uses. Impacts are likely to be minimal, temporary and reversible. Elements that characterise the historic landscape within the Order Limits will be retained, and any temporary change in land use will be reversed following decommissioning. Consequently, it is considered that the Scheme will not alter the ability to understand or experience the historic landscape character of the land within the Order Limits and the legibility of the historic landscape will be maintained. Therefore, **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** concludes that following the implementation of embedded and additional mitigation measures no significant impacts will occur on the historic landscape character during construction or operation of the Scheme.
Paragraph 2.10.109	Below ground impacts, although generally limited, may include direct impacts on archaeological deposits through ground disturbance associated with trenching,	Below ground impacts, including direct impacts on archaeological assets through ground disturbance have been assessed in **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]**.

Relevant Paragraph	Detail	Scheme Compliance
	cabling, foundations, fencing, temporary haul routes etc.	Significant adverse effects, in the absence of additional mitigation, have been identified for 17 archaeological assets. However, following application of additional mitigation, the residual effect would be reduced to negligible, which is not significant. The proposed embedded mitigation includes: • design decisions to remove Solar PV Panels from various fields (or parts of them) within the Solar PV Sites as a result of heritage or archaeological sensitivities; • the incorporation of enhanced visual screening through planting and distance offsets between the Scheme and heritage assets; and • appropriate construction methods such as HDD in order to protect archaeological remains. Additional mitigation proposed includes an overarching Archaeological Mitigation Strategy, which details the additional mitigation during the construction phase of the Scheme (see **ES Volume 3, Appendix 12-6: Archaeological Mitigation Strategy [EN010168/APP/6.3]**).
Paragraph 2.10.110	Equally, solar PV developments may have a positive effect, for example archaeological assets may be protected by a solar PV farm as the site is removed from regular ploughing and shoes or low-level piling is stipulated.	**ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** sets out that for archaeological assets within the Solar PV Sites, there is the potential for low beneficial effects if their removal from regular ploughing is taken into consideration.

Relevant Paragraph	Detail	Scheme Compliance
		Impacts to on-site archaeological remains during the operational phase of the Scheme are detailed in Table 16 in **ES Volume 3, Appendix 12-8: Cultural Heritage Impact Assessment Tables [EN010168/APP/6.3]**. The impacts to buried archaeological features during the operational phase would likely be of a largely beneficial nature, due to these remains being taken out of the agricultural cycle of regular ploughing which most of the fields within the Order Limits are currently subject to.
Paragraph 2.10.112	Applicant assessments should be informed by information from Historic Environment Records (HERs) or the local authority.	All records relating to non-designated heritage assets, other archaeological records and previous archaeological investigations within the Study Areas were collated to inform the assessment of the Scheme's impact on cultural heritage. HERs were used to assess the potential for impacts to non-designated assets and inform the potential for buried archaeological remains. Further detail is set out in **ES Volume 3, Appendix 12-1: Heritage Statement [EN010168/APP/6.3]** and **ES Volume 3, Appendix 12-2: Archaeological Desk-Based Assessments [EN010168/APP/6.3]**.
Paragraph 2.10.113	Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, the applicant should submit an appropriate desk-based assessment and, where necessary, a field evaluation. These should be carried out using expertise where necessary and in consultation with the local planning authority, and	An appropriate desk-based assessment **ES Volume 3, Appendix 12-2: Archaeological Desk-Based Assessment [EN010168/APP/6.3]** and an archaeological geophysical survey **ES Volume 3, Appendix 12-4: Archaeological Geophysical Survey Report [EN010168/APP/6.3]** have informed the assessment on the historic environment.

Relevant Paragraph	Detail	Scheme Compliance
	should identify archaeological study areas and propose appropriate schemes of investigation, and design measures, to ensure the protection of relevant heritage assets.	As set out in Table 12-2 of **ES Volume 1, Chapter 12: Historic Environment [EN010168/APP/6.1]** the Applicant has consulted with the local planning authority in relation to archaeological interests. An overarching Archaeological Mitigation Strategy **ES Volume 3, Appendix 12-6: Archaeological Mitigation Strategy [EN010168/APP/6.3]** details the embedded mitigation required to safeguard archaeological assets identified within the Order Limits. This includes in situ preservation in the form of the removal of Solar PV Panels and associated infrastructure from fields and non-intrusive construction methodology (such as surface mounted pre-cast concrete ground anchors or through locating piles to avoid archaeology or cause minimal disturbance). Where appropriate a non-intrusive construction methodology will serve to preserve archaeological remains in situ
Paragraph 2.10.114	In some instances, field studies may include investigative work (and may include trial trenching beyond the boundary of the proposed site) to assess the impacts of any ground disturbance, such as proposed cabling, substation foundations or mounting supports for solar panels on archaeological assets.	Evaluation trial trenching was undertaken to test the results of the geophysical survey. Interim reports detailing the results of the evaluation trial trenching are provided in **ES Volume 3, Appendix 12-5: Interim Evaluation Trial Trenching Reports [EN010168/APP/6.3]**. The report concluded that the archaeological features recorded across Lime Down A are indicative of rural settlement and agricultural practices predominantly dating from the prehistoric to the Romano-British period. These are several

Relevant Paragraph	Detail	Scheme Compliance
		examples of Late Iron Age to Romano-British square enclosures as well as evidence suggestive of ring ditches which indicate the possibility of habitation.
Paragraph 2.10.115	The extent of investigative work should be proportionate to the sensitivity of, and extent of, proposed ground disturbance in the associated study area.	The extent of the investigative work is detailed in **ES Volume 3, Appendix 12- 5: Interim Evaluation Trial Trenching Reports [EN010168/APP/6.3]** and is proportionate to the sensitivity of, and extent of, any proposed ground disturbance. The archaeological evaluation works were undertaken in line with a Written Scheme of Investigation agreed with the LPA.
Paragraph 2.10.116	Applicants should take account of the results of historic environment assessments in their design proposal.	Within the design of the Scheme, the Applicant has taken account of the results of historic environment assessments. As demonstrated in the **Design Approach Document [EN010168/APP/7.3]**, the design of the Scheme has evolved in response to the outcomes of environmental assessment (including cultural heritage), stakeholder engagement, consultation feedback at non-statutory, statutory and targeted consultation, and technical studies, within a framework provided by a Design Vision and Design Principles which have sought to minimise adverse impacts, enhance opportunities, and balance flexibility and certainty in the DCO application.
Paragraph 2.10.117	Applicants should consider what steps can be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting.	The assessment in **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** considers the designated and non-designated heritage assets in the Study Area, including the contribution of their significance to the setting.

Relevant Paragraph	Detail	Scheme Compliance
		In locations with heritage assets that could be impacted by the Scheme through their settings, enhanced visual screening through vegetation and distance offsets are proposed (Table 5 to Table 9 of **ES Volume 3, Appendix 12-8: Cultural Heritage Impact Assessment Tables [EN010168/APP/6.3]**). Offsets of a minimum 15 m have been applied to public rights of ways (PRoW) and existing hedgerows across the Scheme as set out in **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]**. Offsets in Fields A4, C9, C10, C15, E29 and E32 of the Solar PV Sites provide embedded mitigation to the setting for identified heritage-based sensitivities, as described in **ES Volume 2, Figure 12-2: Archaeological Assets [EN010168/APP/6.2]**.
Paragraph 2.10.118	As the significance of a heritage asset derives not only from its physical presence but also from its setting, careful consideration should be given to the impact of large-scale solar farms which depending on their scale, design, and prominence, may cause substantial harm to the significance of the asset.	**ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** assesses the impact of the Scheme on above and below ground heritage assets and the impacts on their setting. The Heritage Statement at **ES Volume 3, Appendix 12-1: Heritage Statement [EN010168/APP/6.3]** identifies seven designated heritage assets where there is potential for less than substantial harm (including for instance, Bradfield Manor, Surrendell Farmhouse and Fosse Lodge) which is assessed at the lower end of the scale. Following the implementation of embedded mitigation measures including removing panels from fields to limit the impact of the Scheme, and proposing screening and

Relevant Paragraph	Detail	Scheme Compliance
		enhancement of hedgerows, no significant adverse effects have been identified. **ES Volume 3, Appendix 12-1: Heritage Statement [EN010168/APP/6.3]** also identifies five non-designated heritage assets where there is potential for less than substantial harm (such as Townleaze Barn) which is assessed at the lower end of the scale. Following the implementation of embedded mitigation measures including removing panels from fields to limit the impact of the Scheme, and proposing screening and enhancement of hedgerow, no significant effects have been identified. Through sensitive design, the Applicant has taken care to avoid, reduce and mitigate impacts on heritage assets and their setting, in accordance with the mitigation hierarchy. Mitigation specific to each heritage asset is set out in **ES Volume 3, Appendix 12-8: Cultural Heritage Impact Assessment Tables [EN010168/APP/6.3]**.
Paragraph 2.10.137	The ability of the applicants to microsite specific elements of the proposed development during the construction phase should be an important consideration by the Secretary of State when assessing the risk of damage to archaeology.	The Scheme will be constructed in accordance with the parameters outlined in the **Design Principles and Parameters [EN010168/APP/7.4]**, which provides the flexibility necessary to amend the Scheme design should significant unknown archaeological finds be discovered during construction. For the purposes of the Cultural Heritage assessment in **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]**, the elements of flexibility considered include the
Paragraph 2.10.138	Where requested by the applicant, the Secretary of State should consider granting consents which allow for the micrositing within a specified tolerance of elements	

Relevant Paragraph	Detail	Scheme Compliance
	of the permitted infrastructure, so that precise locations can be amended during the construction phase if unforeseen circumstances, such as the discovery of previously unknown archaeology, arise.	maximum development footprint, height, and location of built structures. A worst-case scenario approach has been adopted, assessing the potential impact based on the largest scale and most visually or physically intrusive aspects within the defined parameters.
Paragraph 2.10.160	Solar farms are generally consented on the basis that they will be time-limited in operation. The Secretary of State should therefore consider the length of time for which consent is sought when considering the impacts of any indirect effect on the historic environment, such as effects on the setting of designated heritage assets.	The operational life of the Scheme is expected to be 60 years. **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** concludes that following the implementation and embedded and additional mitigation (as set out in Section 12.9 and 12.11), no significant impacts are anticipated on designated or non-designated heritage assets as a result of the Scheme. At the decommissioning state, **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** sets out the associated traffic movements, similar to those employed during the construction phase, could have an adverse impact upon the settings of nearby designated and non-designated heritage assets, however as impacts would be temporary, short term and reversible in nature, and would ultimately result in the reversal of the operation and maintenance phase impacts leading to neutral effects are anticipated. Similarly decommissioning impacts to archaeological assets and the historic landscape environment are also predicted to be neutral. Embedded mitigation is set out at the decommissioning phase is set out in the **Outline Decommissioning Strategy [EN010168/APP/7.14]** and includes measures such as the avoidance of any archaeological remains preserved below ground during decommissioning.

Relevant Paragraph	Detail	Scheme Compliance
Construction including Traffic and Transport noise and vibration		
Paragraph 2.10.120	Modern solar farms are large sites that are mainly comprised of small structures that can be transported separately and constructed on-site, with developers designating a compound on-site for the delivery and assemblage of the necessary components.	**ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** sets out details of the temporary construction compounds and laydown areas across the Scheme. It is anticipated that goods would be delivered by HGV to the construction compounds within the Solar PV Sites and then distributed to the point of need within the Order Limits using lighter vehicles (e.g. tractor and trailer) as required.
Paragraph 2.10.121	Many solar farms will be sited in areas served by a minor road network. Public perception of the construction phase of solar 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.	**ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]** outlines that there will not be a significant percentage change in the number of daily vehicles trips on the strategic network, namely the M4, A46 and A429 (less than 2.5%) as a result of construction traffic. Smaller, rural roads will see a higher percentage increase in daily traffic flows. However, these typically have low baseline traffic flows and still have sufficient capacity to accommodate the anticipated trips. **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** concludes that the Scheme is not likely to result in any significant residual Transport and Access effects during the construction, operation and decommissioning phases. Through the **Outline CTMP [EN010168/APP/7.22]** and its proposed measures, the effects of the Scheme on the Local Transport Network and Strategic Road

Relevant Paragraph	Detail	Scheme Compliance
		Network will be minimised during the construction phase. The **Outline CTMP [EN010168/APP/7.22]** sets out measures to manage construction vehicle movements to and from the Order Limits to ensure that the effect of the construction phase and operational and maintenance phase on the local highway network is minimised. This has been produced following engagement with Wiltshire Council. The **Outline CTMP [EN010168/APP/7.22]** has the following objectives: • Minimise the number of HGVs and other vehicles on the local road network that are associated with the construction phase and operational and maintenance phase of the Scheme; • Ensure the safe movement of equipment, material and construction workers; • Minimise the effects of construction traffic on the local community; and • Set out measures to be adhered to by all associated with the construction phase and operational and maintenance phase of the Scheme. The **Outline CTMP [EN010168/APP/7.22] is** secured through Requirement 15 under Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**.

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 2.10.123	Applicants should assess the various potential routes to the site for delivery of materials and components where the source of the materials is known at the time of the application, and select the route that is the most appropriate.	The various routes to the site for delivery of materials and components has been assessed in **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** and **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]**. The assessment is based on a worst-case scenario. As set out in Section 13.9 of **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]**, the construction routes have been designed to utilise the most appropriate roads available, and to avoid, where practicable, designated or protected areas, height and weight restrictions and residential areas. The **Outline CTMP [EN010168/APP/7.22]** provides further detail of construction vehicle routing including the specific route to site, and the route signage that will be put in place to ensure that construction traffic remains on the routes identified. **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** concludes that the Scheme is not likely to result in any significant residual transport and access effects during the construction, operation and decommissioning phases.
Paragraph 2.10.124	Where the exact location of the source of construction materials, such as crushed stone or concrete is not known at the time of the application, applicants should assess the worst-case impact of additional vehicles on the likely potential routes.	The various routes to the site for delivery of materials and components has been assessed in **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** and **ES Volume 3, Appendix**

Relevant Paragraph	Detail	Scheme Compliance
		13-1: Transport Assessment [EN010168/APP/6.3]. The assessment is based on a worst-case scenario.
Paragraph 2.10.125	Applicants should ensure all sections of roads and bridges on the proposed delivery route can accommodate the weight and volume of the loads and width of vehicles. Although unlikely, where modifications to roads and/or bridges are required, these should be identified, and potential effects addressed in the ES.	The **Outline CTMP [EN010168/APP/7.22]** provides the approach to abnormal loads and the routes identified for abnormal load movements. To accommodate the proposed abnormal load movements, temporary mitigation will be required at certain locations along the identified abnormal load routes. These form part of the Highway Improvement Areas which provide improvements to the existing highway network to facilitate access to the Scheme such as improvements to road edge and traffic management. **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** concludes that all construction routes can accommodate construction vehicle movements, with Highway Improvement Areas in place.
Paragraph 2.10.126	Where a cumulative impact is likely because multiple energy infrastructure developments are proposing to use a common port and/or access route and pass through the same towns and villages, applicants should include a cumulative transport assessment as part of the ES. This should consider the impacts of abnormal traffic movements relating to the project in question in combination with those from any other relevant development. Consultation with the relevant local highways authorities is likely to be necessary.	An assessment of cumulative effects on transport and access is set out in Section 13.13 of **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]**. The Applicant has consulted with the relevant local highways authorities in relation to the undertaken cumulative effects assessment. It states that the number of traffic flows on the links associated with the construction phase of the Scheme are low, and it is therefore unlikely that the cumulative effects will greatly affect the severity of effects from the Scheme. This is particularly the case given that the

Relevant Paragraph	Detail	Scheme Compliance
		impacts of the construction phase are temporary in nature and that measures set out in the Outline CTMP **[EN010168/APP/7.22]** will ensure that construction traffic avoids the AM and PM highway peaks. **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** notes that for the Solar PV Sites, it is not likely that all cumulative BESS Area and Solar schemes will be constructed simultaneously, and at the same time as the Scheme. Furthermore, for the Cable Route Corridor, in the unlikely case that there are vehicle movements on the more local roads within the Study Area, the addition of the low vehicle movements associated with each cable route corridor access, over a 90-day period, will not result in a significant cumulative effect at these locations. **Chapter 13: Transport and Access [EN010168/APP/6.1]** concludes that the cumulative effects of the Scheme on transport and access are not considered to be significant.
Paragraph 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.	As set out in Section 13.2 of **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]**, engagement has been undertaken with stakeholders comprising Wiltshire Council and National Highways. A summary of consultation undertaken is provided in Table 13-2.

Relevant Paragraph	Detail	Scheme Compliance
		Construction vehicle movements will be managed through the **Outline CTMP [EN010168/APP/7.22]** which aims to ensure that the effect of the construction phase on the local and strategic highway network is minimised. Construction vehicles will avoid travel during the network peak hours where possible. Therefore, deliveries will be scheduled for between 09:30 and 16:30 where possible. There will be a small number of Abnormal Indivisible Loads (AIL) to transport the larger transformers and substation equipment. The proposed abnormal load routes to the Scheme are shown in **ES Volume 2, Figure 13-5: Abnormal Indivisible Load Routes - Solar PV Sites [EN010168/APP/6.2]** and **ES Volume 2, Figure 13-6: Abnormal Indivisible Load Routes - Cable Route Corridor [EN010168/APP/6.2]**. Abnormal load movements will be managed by a specialist haulage company so that the potential effects are mitigated. The exact measures will be agreed with the Local Highway Authority and police prior to the movements occurring. Additional details, including confirmation of the AIL routes, are set out within the **Outline CTMP [EN010168/APP/7.22]**. The **Outline CTMP [EN010168/APP/7.22]** is secured under Requirement 15 in Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**.

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 2.10.140	Where the Secretary of State agrees that this is necessary, requirements could be imposed on development consent.	The Applicant has included proposed requirements as part of the **Draft DCO [EN010168/APP/3.1]**.
Paragraph 2.10.141	Where cumulative effects on the local road network or residential amenity are predicted from multiple solar farm developments, it may be appropriate for 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.	An assessment of cumulative effects on transport and access is set out in Section 13.13 of **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** which concludes that cumulative effects in relation to vehicles movements related to the Solar PV Sites and the cable corridor will be either minor or negligible. **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** also notes that it is not likely that all cumulative BESS Area and Solar schemes will be constructed simultaneously, and at the same time as the Scheme.
Paragraph 2.10.142	It may also be appropriate for the highway authority to set limits for, and coordinate these deliveries through, active management of the delivery schedules through the abnormal load approval process.	There will be a small number of Abnormal Indivisible Loads (AIL) to transport the larger transformers and substation equipment. The Proposed AIL routes to the Study Area are shown in **ES Volume 2, Figure 13-5: Abnormal Indivisible Load Routes - Solar PV Sites [EN010168/APP/6.2]** and **ES Volume 2, Figure 13-6: Abnormal Indivisible Load Routes - Cable Route Corridor [EN010168/APP/6.2]**. These movements will be managed by a specialist haulage company so that the potential effects are mitigated. The exact measures will be agreed with the Local Highway Authority and police prior to the movements occurring. Additional details, including confirmation of the AIL routes, are set out within **Outline CTMP [EN010168/APP/7.22]**. The **Outline**

Relevant Paragraph	Detail	Scheme Compliance
		CTMP [EN010168/APP/7.22] will be secured via Requirement 15 under Schedule 2 of the **Draft DCO [EN010168/APP/3.1].**
Paragraph 2.10.143	Once consent for a scheme has been granted, applicants should liaise with the relevant local highway authority (or other coordinating body) regarding the start of construction and the broad timing of deliveries. Applicants may need to agree a planning obligation to secure appropriate measures, including restoration of roads and verges.	The Applicant will continue to liaise with the local highways authorities following the submission of the application and following consent, should consent be granted.
Paragraph 2.10.144	Further, it may be appropriate for any non-permanent highway improvements carried out for the development (such as temporary road widening) to be made available for use by other subsequent solar farm developments.	The Scheme proposes 'Highway Improvement Areas' adopted into the design where the construction routes pass through sections of road that are considered narrow and require widening, which will ensure that sufficient passing room is present along the routes or traffic management is implemented to ensure the safe movement of construction vehicles. The Highway Improvement Areas will be located on the construction routes and further details of these are set out in Section 13.10 of **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1], ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3],** and Section 4.6 and 5 of the **Outline CTMP [EN010168/APP/7.22]**. A detailed version of the **Outline CTMP [EN010168/APP/7.22]** will be secured via Requirement 15 under Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**. All construction routes can accommodate construction vehicle movements with Highway Improvement Areas

Relevant Paragraph	Detail	Scheme Compliance
		in place. It is not yet expected that these will be used by other subsequent solar farm developments however opportunities may be explored should there be any future engagement with developers.

NPS EN-5: Electricity Networks Infrastructure

Relevant Paragraph	Detail	Scheme Compliance
Background		
Paragraph 1.1.1	The security and reliability of the UK's current and future energy supply is highly dependent on having an electricity network which will enable the new electricity generation, storage, and interconnection infrastructure that our country needs to meet the rapid increase in electricity demand required to transition to net zero, while maintaining energy security.	The Scheme will contribute towards an electricity network to help support the rapid increase in electricity demand required to meet net zero and contributing towards security of supply. The **Statement of Need [EN010168/APP/7.1]** explains that the meaningful and timely contributions offered by the Scheme to UK decarbonisation and security of supply, while helping lower bills for consumers throughout its operational life, will be critical on the path to net zero beyond delivery of the government's 'Clean Power by 2030' mission. Without the Scheme, a significant and vital opportunity to develop a large-scale low carbon generation scheme will have been passed over, increasing materially the risk that future Carbon Budgets and the net zero 2050 target will not be achieved.
Paragraph 1.1.5	As identified in EN-1, government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. This includes: for electricity grid infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as substations. 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. These are viewed by the government as being	The Scheme is low carbon solar PV generation infrastructure and is CNP. Substantial weight should be afforded to the Scheme in the decision-making process due to its need being established as a CNP. The associated infrastructure associated with the Scheme is also considered CNP infrastructure under this policy, which includes substations incorporated into the Scheme. The **Statement of Need [EN010168/APP/7.1]** explains that the Scheme will be a substantial infrastructure asset, which if consented will deliver over 100 MW of

Relevant Paragraph	Detail	Scheme Compliance
	CNP infrastructure and should be progressed as quickly as possible.	secure, and low carbon electricity which will help the UK achieve its Sixth Carbon Budget commitments and stay on track to achieve net zero by 2050.
Site Selection and Design		
Paragraph 2.2.8	There will usually be a degree of flexibility in the location of the development's associated substations, and applicants should consider carefully their location, as well as their design.	**ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** and the **Design Approach Document [EN010168/APP/7.3]** set out how the Applicant has sought to retain flexibility regarding the design detail of certain components of the Scheme, for example the Applicant is seeking to retain flexibility in the arrangement of components such as substations associated with the Scheme. The **Design Approach Document [EN010168/APP/7.3]** sets out the design evolution of the Scheme from inception to DCO submission, including how the site was selected and the optionality included for location of infrastructure such as BESS and substations. It sets out how these elements are sequentially, in areas with a 'Low' probability of flooding (less than 1 in 1,000 annual probability of river or sea flooding (<0.1%)), where practicable. And that the BESS Area and Substation sites are a minimum of 450 m and 400 m from sensitive receptor locations respectively to minimise noise and vibration effects. The **Design Approach Document [EN010168/APP/7.3]** also details how an increased area in Lime Down A for the 132 kV substation was

Relevant Paragraph	Detail	Scheme Compliance
		provided following statutory consultation to allow for more flexibility in siting and design, so it can adapt over time and be fit for purpose while responding to innovative and new technologies, in line with Design Principle 4 for the Scheme. Consideration of the design evolution of the Scheme with regard to location of substations can be found in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]**. The design parameters setting out the minimum and maximum parameters that the Scheme has been assessed against in the ES are set out in detail in the **Design Principles and Parameters [EN010168/APP/7.4]**.
Paragraph 2.2.9	In particular, the applicant should consider such characteristics as the local topography, the possibilities for screening of the infrastructure and/or other options to mitigate any impacts. (See Section 2.10 below and Section 5.10 in EN-1.)	The **Design Approach Document [EN010168/APP/7.3]** sets out that the Scheme considered topography from the outset of the design process. Topography was a consideration during site selection, as set out in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report (SSAR) [EN010168/APP/6.3]**, given suitable land maximises energy generation and avoids visual intrusion. Design principles have been adopted within the design of the Scheme are set out in the **Design Approach Document [EN010168/APP/7.3]**. These include ensuring the Scheme is 'Landscape Led' and giving

Relevant Paragraph	Detail	Scheme Compliance
		due weight to the intrinsic character and beauty of the surrounding countryside, and designing a Scheme that is sensitive to existing land uses where practicable and maximises opportunities to strengthen green and blue infrastructure for example tree and hedgerow planting, and creation of ponds as detailed in the **Outline LEMP [EN010168/APP/7.18]**. This will be secured through Requirement 7 under Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**. With regard to the Cable Route Corridor, **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** does not anticipate significant landscape effects would occur within the Cable Route Corridor Study Area with all effects being short term and temporary in nature with cables placed underground. In terms of visual effects in the Cable Route Corridor, two significant effects would occur to private receptors (Foscote RS022 and Easton RS024) during construction and to six public receptors (Bridleway and Footpath) as set out in Table 1-19: Summary of Visual Effects within the CRC Study Area of **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]**. These receptors are located close to the Cable Route Corridor and would experience a change in views and visual amenity. No significant visual effects within the Cable Route Corridor Study Area would occur during operation or decommissioning.

Relevant Paragraph	Detail	Scheme Compliance
		ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] sets out how landscape and visual impacts have been minimised as far as practicable. Through the application of good design principles including the application of the mitigation hierarchy, a robust approach to secure good design would be achieved**. ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** concludes that in relation to visual effects, significant visual effects would be experienced by 9 private receptors during construction and at Year 1 Operation. These significant effects would fall away in Operation Year 15 and at decommissioning once landscaping has become established. For public receptors during each phase of the Scheme, **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** concludes that during construction and at Operation Year 1, 27 public receptors would experience significant visual effects. As planting matures, at Operation – Year 15 and at decommissioning, significant effects would be reduced to 10 affected public receptors. For transport receptors, **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** confirms that during construction significant visual effects would occur to 12 transport receptors, reducing to 11 receptors during Year 1 of operation and no significant visual effects occurring during operation at Year 15 or during decommissioning. In terms of visual effects in the Cable Route Corridor, 6 significant effects would occur to private receptors during construction and to 7 public

Relevant Paragraph	Detail	Scheme Compliance
		receptors as set out in **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]**. These receptors are located close to the Cable Route Corridor and would experience a change in views and visual amenity. No significant visual effects within the Cable Route Corridor Study Area would occur during operation (Year 1 or Year 15) or decommissioning. It should be noted that where significant long-term effects on public receptors remain at Year 15, this is primarily because mitigation is not proposed as it would not be appropriate to the long-term landscape character and the legacy landscape. For example, where footpaths diagonally cross fields, new hedgerows to screen views of infrastructure would not be consistent with the regular pattern of fields which is characteristic of the existing landscape. Other instances of significant long-term visual effects on Public Receptors relate to the local topography where there are views from higher ground to infrastructure which cannot be fully alleviated by mitigation.
Climate Change Adaptation and Resilience		
Paragraph 2.3.1	Section 4.10 of EN-1 sets out the generic considerations that applicants and the Secretary of State should take into account in order to ensure that electricity networks infrastructure is resilient to the effects of climate change.	As detailed in **Annex A National Policy Accordance Tables** of the **Planning Statement [EN010168/APP/7.2]** the Applicant has had regard to the considerations within Section 4.10 in relation to climate change adaptation and resilience.

Relevant Paragraph	Detail	Scheme Compliance
		ES Volume 1, Chapter 7: Climate Change of the **ES [EN010168/APP/6.1]** sets out that the Scheme has been designed, as far as practicable, to avoid and reduce impacts and effects on climate change and to increase climate change resilience through the process embedding measures into the design. In addition, how the Scheme is constructed, operated and maintained, and decommissioned would be controlled through measures secured in the DCO in order to manage and minimise potential environmental effects (required as a result of legislative requirements and/or standard sectoral practices). **ES Volume 1, Chapter 7: Climate Change** of the **ES [EN010168/APP/6.1]** sets out that following embedded mitigation measures for example locating electrical infrastructure to areas with 'low' probability of flooding, elevating solar PV panels, and heating, ventilation and cooling systems to control the temperature of BESS (set out in full in Section 7.9), no significant impacts will occur from direct impacts during the construction, operation and decommissioning of the Scheme.
Paragraph 2.3.2	As climate change is likely to increase risks to the resilience of some of this infrastructure, from flooding for example, or in situations where it is located near the coast or an estuary or is underground, applicants should in particular set out to what extent the proposed development is expected to be vulnerable, and, as appropriate, how it has been designed to be resilient to:	**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 in the design of the Scheme and during the construction, operation and decommissioning of the Scheme. Section 7.9 of **Chapter 7: Climate Change** of the **ES [EN010168/APP/6.1]** sets out the measures

Relevant Paragraph	Detail	Scheme Compliance
	• 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.	embedded into the Scheme design which include (but are not limited to): • Locating associated electrical infrastructure, including substations and conversion units sequentially to areas with a 'low' probability of flooding where practicable. • Less-flood sensitive infrastructure forming the wider Scheme (Solar PV Panels and cabling) will be sequentially located outside the 1 in 100 plus climate change annual probability extent (1% +CC) or where this is not practicable restricted to areas which would experience less than 1m depth of flooding during the same event. • For both fixed and tracker panels, all sensitive and electrical equipment on the Solar PV Panel will be elevated by the legs (including the solar panel face itself) so that it is no less than 0.6 metres above the surrounding peak flood level; and • Tracker panel units will be mounted on raised frames (raised a minimum of 0.4 metres when on maximum rotation angle) and will therefore be raised above surrounding ground levels and fitted with a tracking system. During times of flooding, solar panels may be stowed by the tracking system algorithm onto a horizontal plane, to the minimum post height of 2.5 metres above ground level. This ensures that all sensitive and electrical equipment on the solar

Relevant Paragraph	Detail	Scheme Compliance
		panel is raised to a minimum of 2.5 metres above ground level in the horizontal position. • BESS will include heating, ventilation and cooling systems to control the temperature and allow efficient operation during warmer conditions. These mitigation measures, and those detailed further in **ES Volume 1, Chapter 7: Climate Change** of the **ES [EN010168/APP/6.1]** will be secured through the **Outline CEMP [EN010168/APP/7.12]** and **Outline OEMP [EN010168/APP/7.13]** which will developed into a detailed CEMP and OEMP prior to commencement of construction. Similar measures will be developed prior to the decommissioning phase for the use of lower-carbon and more climate change resilient methods and will be outlined in the **Outline Decommissioning Statement (DS) [EN010168/APP/7.14]**. These will be secured through Requirements under Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**. Further climate resilience measures, including those associated with flood risk are set out within the **Outline CEMP [EN010168/APP/7.12]** and in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**. The effects of winds and storms on overhead lines and coastal erosion does not apply to the Scheme. The

Relevant Paragraph	Detail	Scheme Compliance
		cables associated with the Scheme will be laid underground.
Paragraph 2.3.3	Section 4.10 of EN-1 advises that the resilience of the project to the effects of climate change must be assessed in the Environmental Statement (ES) accompanying an application. For example, future increased risk of flooding would be covered in any flood risk assessment (see Sections 5.8 in EN-1). Consideration should also be given to coastal change (see sections 5.6 in EN1).	The effects of climate change are assessed in **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]**. This includes a Climate Change Risk Assessment and an In-Combination Climate Change Impact Assessment. **ES Volume 1, Chapter 7: Climate Change** of the **ES [EN010168/APP/6.1]** sets out that following embedded mitigation measures, no significant impacts will occur from these direct impacts during the construction, operation and decommissioning of the Scheme. Flood risk impacts are considered in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** and **Appendix 11-1 to 11-9 [EN010168/APP/6.3]**. **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage** of the **ES [EN010168/APP/6.1]** sets out the proposed embedded mitigation in relation to flood risk, including measures related to flood risk and resilience, drainage and surface water management, water quality and pollution control, and silt-laden runoff and leaks of pollutants. **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** concludes that following the implementation of embedded mitigation, no significant effects are anticipated. Further detail on mitigation measures in relation to flood risk are set out in the **Outline CEMP [EN010168/APP/7.12]** and

Relevant Paragraph	Detail	Scheme Compliance
		Outline OEMP [EN010168/APP/6.1]. This will be secured through requirements 13 and 14 under Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**. Coastal change does not apply to the Scheme as it is not located in a coastal area.
Consideration of good design for energy infrastructure		
Paragraph 2.4.2	Applicants should consider the criteria for good design set out in EN1 Section 4.7 at an early stage when developing projects	**The Design Approach Document [EN010168/APP/7.3]** sets out how good design has been embedded into the Scheme from the outset, and how it will continue to be achieved through to detailed design, to ensure that the Scheme achieves well-designed project outcomes. This has included adopting design principles that drive design-related decision making throughout the Scheme's lifecycle, providing a framework for development of the design over the course of the pre-application stage, and informing the local community of the design development ahead of the statutory consultation. Consideration of the Schemes compliance with section 4.7 of EN-1 is demonstrated in the NPS EN-1 Accordance Table included in **Annex A National Policy Accordance Tables** of the **Planning Statement [EN010168/APP/7.2]**.
Paragraph 2.4.3	However, the Secretary of State should bear in mind that electricity networks infrastructure must in the first instance be safe and secure, and that the functional design constraints of safety and security may limit an	As set out in **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** safety and security has been a key consideration in the design of the Scheme. This includes security measures, such as deer wire mesh

Relevant Paragraph	Detail	Scheme Compliance
	applicant's ability to influence the aesthetic appearance of that infrastructure.	and wooden post fencing, palisade fencing around the substations and BESS Area, and pole mounted internal facing CCTV around the permitter of the operational elements of the Solar PV Sites. It also includes an **Outline Battery Safety Management Plan [EN010168/APP/7.21]** which sets out the measures for dealing with fire risk from the BESS included in the Scheme. Further details of site security during the construction and operation of the Scheme are also set out in Section 2.11 the **Outline CEMP [EN010168/APP/7.12]** and Section 2.16 of the **Outline OEMP [EN010168/APP/7.13]**. These measures will be secured through Requirements under Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**. While it is acknowledged there are constraints with external appearance of elements of the Scheme, the **Design Approach Document [EN010168/APP/7.3]** and Section 2 of the Planning Statement, sets out that the Scheme has undergone an iterative design process which has resulted in the delivery of a functional and efficient Scheme design which will deliver large amounts of renewable and low carbon energy while being sensitive to local context and surroundings.
Environmental and Biodiversity Net Gain		
Paragraph 2.5.1	When planning and evaluating the proposed development's contribution to environmental and biodiversity net gain, it will be important – for both the applicant and the Secretary of State – to supplement the	The Scheme has the potential to deliver biodiversity benefits as a result of the embedded mitigation and enhancement measures as set out in **ES Volume 1, Chapter 9: Ecology and Biodiversity**

Relevant Paragraph	Detail	Scheme Compliance
	generic guidance set out in EN-1 (Section 4.6) with recognition that the linear nature of electricity networks infrastructure can allow for excellent opportunities to: i. reconnect important habitats via green corridors, biodiversity stepping zones, and reestablishment of appropriate hedgerows; and/or ii. connect people to the environment, for instance via footpaths and cycleways constructed in tandem with environmental enhancements.	**[EN010168/APP/6.1]** and **Outline LEMP [EN010168/APP/7.18]** secured through Requirement 7 under Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**. As set out in section **Error! Reference source not f ound.** of the **Planning Statement [EN010168/APP/7.2]**, a variety of habitat creation and landscape enhancements are proposed as part of the Scheme, including new hedgerow and tree planting, reinforcement planting at existing hedgerows and field boundaries, extensive grassland habitat creation and sympathetic management both within buffers and under the Solar PV arrays, as well as discrete, valuable habitat creation away from the Solar PV Panels. These measures proposed for the Scheme are further detailed in the **Outline LEMP [EN010168/APP/7.18]** and the **Outline Ecological Protection and Mitigation Strategy [EN010168/APP/7.19]** to be secured through Requirements 7 and 8 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**. **The Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]** sets out how a minimum of 10% net gain will be achieved for the Scheme (using the Defra Statutory Biodiversity Metric). The Scheme will deliver, as a minimum, 10% BNG, which is secured via Requirement 9 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**. The **BNG Assessment Report**

Relevant Paragraph	Detail	Scheme Compliance
		[EN010168/APP/7.8] indicates that BNG in excess of 10% will be achieved, with a total net gain of 63.80% for area habitat units, 19.35% for hedgerow units and 25.30% for watercourse units in relation to the Solar PV Sites. The total net gain for the whole Scheme (i.e. Solar PV Sites and Cable Route Corridor combined) is 34.75% for area habitat units, 12.31% for hedgerow units and 20.08% for watercourse units, as set out in the **BNG Assessment Report [EN010168/APP/7.8]**. The Scheme will also result in the creation of 12.8 km of new permissive paths, which will be open up to 365 days per calendar year throughout the proposed 60-year operational lifetime of the Scheme. The location of the permissive paths is shown on the **Works Plan [EN010168/APP.2.3]** as Work No.10B, indicated on **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2],** and they are listed in the **Outline PRoW and Permissive Paths Management Plan [EN010168/APP/7.17]**. Their creation and maintenance is secured through a Requirement in Schedule 2 to **the Draft DCO [EN010168/APP/3.1]**.
Land Rights and Land Interests		
Paragraph 2.6.1	In order to be lawfully able to install, inspect, maintain, repair, adjust, alter, replace or remove an electricity line (above or below ground), its related equipment (such as monopoles, pylons/transmission towers, transformers and cables), and/or its associated mitigation or enhancement schemes, applicants must:	The Applicant has sought to secure the rights over land, both temporary and permanent, through voluntary negotiations. The **Statement of Reasons [EN010168/APP/4.1]** sets out that the compulsory acquisition powers sought in the **Draft DCO [EN010168/APP/3.1]** that are necessary to provide

Relevant Paragraph	Detail	Scheme Compliance
	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)	sufficient land and rights to construct, operate and decommission the Scheme. All reasonable alternatives to compulsory acquisition have been explored and where possible secured, for example through landowner agreement as evidenced in the **Book of Reference [EN010168/APP/4.3]**. The **Statement of Need [EN010168/APP/7.1]** sets out the need for the Scheme and how in line with the energy National Policy Statements the government recognises the need for significant amount of new large-scale energy infrastructure. Considering this, the compulsory acquisition of land and the temporary use of land is considered reasonable and justified.
Paragraph 2.6.2	Where the applicant does not own or wish to own the land in question, it should try to reach a voluntary agreement giving it sufficient rights and/or permissions to undertake the relevant work	
Paragraph 2.6.3	As a last resort, where it does not succeed in reaching the agreement that it requires, the network company may, as part of its application to the Secretary of State, seek to acquire rights compulsorily over the land in question by means of a provision in the DCO.	
Paragraph 2.6.4	In such cases (i.e. where the compulsory acquisition of rights is sought) permanent arrangements are strongly preferred over voluntary wayleaves (which could, for example, be terminable on notice by the landowner) in virtue of their greater reliability and economic efficiency and reflecting the importance of the relevant infrastructure to the nation's net zero goals.	
Paragraph 2.6.5	The applicant may also seek the compulsory acquisition of land. This will not normally be necessary where lines and cables are installed but may be sought where other forms of electricity networks infrastructure (such as new substations) are required.	

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 2.6.6	As detailed in Section 4.1.8 of EN-1, where the use of land at a specific location is required to facilitate the development by providing for mitigation, landscape enhancement and biodiversity net gain, an applicant may, as part of its application to the Secretary of State, seek the compulsory acquisition of that land, or rights over that land. The Secretary of State will consider any such application under the provisions of the Planning Act 2008 and any associated guidance.	
Paragraph 2.6.7	Ahead of securing land rights or interests for transmission infrastructure development itself, an applicant will, in many cases, need to obtain access to land to conduct technical and environmental surveys to inform their development proposals. Some of these will be seasonal species surveys meaning there are limited opportunities during the course of the year in which they can be undertaken; timely access for surveys can have a significant impact on overall project timelines.	
Strategic Network Planning		
Paragraph 2.8.5	TOs and DNOs are also required to facilitate competition in the generation and supply of electricity, and electricity distributors have a statutory duty to provide a connection where requested.	The **Grid Connection Statement [EN010168/APP/7.5]** explains that the Applicant has accepted a valid grid connection offer from National Energy System Operator to connect the Scheme via an underground cable to the National Electrical Transmission System at National Grid Melksham Substation. It is recognised in NPS EN-1 (Paragraph 3.2.4) that *a large number of consented projects can help deliver an*

Relevant Paragraph	Detail	Scheme Compliance
		affordable electricity system by driving competition amongst different technology and infrastructure types, which the Scheme, with the grid connection detailed in the **Grid Connection Statement [EN010168/APP/7.5]**, will contribute towards, if consented.
Noise and Vibration		
Paragraph 2.9.37	Audible noise effects can also arise from substation equipment such as transformers, quadrature boosters and mechanically switched capacitors.	The assessment of noise effects set out in **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** includes an assessment of noise from substations and associated equipment during construction, operation and decommissioning of the Scheme. **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** concludes following implantation of the embedded mitigation measures outlined in section 14.9 and the additional mitigation measures in 14.11, no significant residual effects are anticipated as result of the Scheme. These measures are detailed in the **Outline CEMP [EN010168/APP/7.12]**, **Outline OEMP [EN010168/APP/7.13]** and **Outline Decommissioning Strategy [EN010168/APP/7.14]**. These will be secured through Requirements under Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**.
Paragraph 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	Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** sets out the measures embedded into the Scheme design to minimise noise and vibration effects at sensitive receptors. During the

Relevant Paragraph	Detail	Scheme Compliance
	attenuation present (either engineered intentionally or provided by other structures).	operation and maintenance phase of the Scheme, these measures include (but are not limited to): • the BESS Area and 132 kV and 400 kV Substations have been located a minimum of 450m and 400m from receptor locations respectively; and • all 132 kV and 400 kV Substation transformers to be housed in enclosures. Following the implementation of the embedded mitigation measures, noise levels do not exceed SOAEL at any receptor. Notably, noise levels are reduced from 78 dB Lw to 63 dB Lw at the 132KV Substation Transformer and from 88dB Lw to 73Db Lw at the 400kV Substation Transformer following the implementation of these measures. Details of the specific noise impact on each assessed receptor are set out in Section 1.5 of **ES Volume 3, Appendix 14-4: Noise Modelling [EN010168/APP/6.3]**. Section 14.11 of **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** sets out additional mitigation measures in the form of a bespoke communication plan for occupants which may experience short term temporary effects during the construction phase. **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** concludes that following the implementation of embedded and additional mitigation measures, there are no significant residual noise effects.

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 2.9.39	For the assessment of noise from substations, standard methods of assessment and interpretation using the principles of the relevant British Standards are satisfactory.	As set out in Section 14.3 of **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]**, other standards and guidance including British Standards such BS 5228-1:2014 are relevant to the assessment of the Scheme. As set out in Sections 1.2 to 1.4 **of ES Volume 3, Appendix 14-4: Noise Modelling [EN010168/APP/6.3]** the BS' have been applied as follows: • Sound Power Level (Lw) values for equipment to be used during construction activities have been sourced from BS 5228:2009+A1:2014 Code of Practice for Noise and Vibration Control on Construction and Open Sites - Part 1 (Noise) (BS 5228-1:2014); • Sound Power Level (Lw) values for equipment to be used during HDD construction activities have been sourced from BS 5228-1:2014; • Piling source data from BS 5228:2009+A1:2014 Code of Practice for Noise and Vibration Control on Construction and Open Sites - 2 (Vibration) (BS 5228-2:2014) has been used to estimate the likely distances at which PPV levels would exceed the LOAEL and SOAEL thresholds; and • Vibratory roller source data from BS 5228-2:2014 has been used to estimate the likely distances at which PPV levels would exceed

Relevant Paragraph	Detail	Scheme Compliance
		the LOAEL and SOAEL thresholds at nearby sensitive receptors. These embedded measures represent Best Practicable Means and will be secured within the **Outline CEMP [EN010168/APP/7.12]** for the construction phase and the **Outline Decommissioning Strategy [EN010168/APP/7.14]** for the decommissioning phase. These documents would be secured through DCO requirements under Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**.
Paragraph 2.9.59	Sulphur Hexafluoride (SF6) is an insulating and arc suppressant gas used in high-voltage switchgear for electricity networks	Sulphur Hexaflouride (SF_6) is used in electrical equipment associated with the Scheme such as gas-insulated switchgear and transformers. The Greenhouse Gas (GHG) Assessment set out in **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** includes an assessment of the GHG impact of the Scheme during construction, operation and maintenance, and decommissioning, and considers the potential for leakage of SF_6 throughout the operation of the Scheme. **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** sets out that the Scheme will adhere to good practice and guidance. In addition, gas-insulated switchgear equipment is now supplied to minimise leakages. Additionally, through regular checks of the equipment for gas leaks, it can be expected the leaks to be de minimis.
Paragraph 2.9.60	It is also an extraordinarily potent greenhouse gas, and fugitive emissions from electricity networks infrastructure are an object of increasing environmental concern, especially in light of the UK's commitment to net zero by 2050.	
Paragraph 2.9.61	Applicants should at the design phase of the process consider carefully whether the proposed development could be reconceived to avoid the use of SF6-reliant assets.	
Paragraph 2.9.62	Where the development cannot be so conceived, the applicant must provide evidence of their reasoning on this point. Such evidence will include, for instance, an explanation of the alternatives considered, and a case why these alternatives are technically infeasible or require bespoke components that are grossly disproportionate in terms of cost.	

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Paragraph 2.9.63	In particular, an accounting of the cost differential between the SF6-reliant asset and the appropriate SF6-free alternative should be provided.	**ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** also concludes that the Scheme's design and integrated mitigation measures effectively address climate change risks and that no significant climate change risks during the construction, operation and maintenance or decommissioning phase have been identified. The findings of the GHG assessment indicate that the Scheme will yield beneficial impacts and achieve a net reduction in GHG emissions, compared to a scenario without the Scheme.
Paragraph 2.9.64	Where applicants, having followed the above procedure, do propose to put new SF6-reliant assets onto the electricity system, they should design a plan for the monitoring and control of fugitive SF6 emissions consistent with the Fluorinated gas (F-gas) Regulation and its successors.	
Landscape and Visual		
Paragraph 2.10.8	Furthermore, since long-term management of the selected mitigation schemes is essential to their mitigating function, a management plan, developed at least in outline at the conclusion of the examination, and which sets out proposals within a realistic timescale, should secure the integrity and benefit of these schemes. This should also uphold the landscape commitments made to achieve consent, alongside any pertinent commitments to environmental and biodiversity net gain.	The Applicant is committed to achieving the Government's target of at least 10% biodiversity net gain as set out in the Environment Act 2021. The **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8**] which has been produced using the Defra Statutory Biodiversity Metric indicates the Scheme will deliver, as a minimum, 10% BNG, which is secured via Requirement 9 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**. The **BNG Assessment Report [EN010168/APP/7.8]** indicates that BNG in excess of 10% will be achieved, with a total net gain of 63.80% for area habitat units, 19.35% for hedgerow units and 25.30% for watercourse units in relation to the Solar PV Sites. The total net gain for the whole Scheme (i.e. Solar PV Sites and Cable Route Corridor combined) is 34.75% for area habitat

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		units, 12.31% for hedgerow units and 20.08% for watercourse units, as set out in the **BNG Assessment Report [EN010168/APP/7.8]**. Measures are secured in the **Outline LEMP [EN010168/APP/7.18]** which provides a framework for the planting, management and monitoring of landscaping and ecological mitigation and enhancement habitats for the Scheme during the construction and operational phases, and the **Outline Ecological Protection and Mitigation Strategy [EN010168/APP/7.19]**. The **Outline LEMP [EN010168/APP/7.18]** and the **Outline Ecological Protection and Mitigation Strategy [EN010168/APP/7.19** are secured through Requirements 7 and 8 under Schedule 2 in the **Draft DCO [EN010168/APP/3.1].**
Electric and Magnetic Fields		
Paragraph 2.10.11	The applicant should consider the following factors: • height, position, insulation and protection (electrical or mechanical as appropriate) measures subject to ensuring compliance with the Electricity Safety, Quality and Continuity Regulations 2002; • that optimal phasing of high voltage overhead power lines is introduced wherever possible and practicable in accordance with the Code of Practice to minimise EMFs; and	Section 20.6 of **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** provides an assessment of the likely significant effects of EMFs as a result of the Scheme. This sets out the legislation and government policy considered as part of the assessment, and any other relevant guidance. The design of the Scheme will be compliant with the Electricity Safety, Quality and Continuity Regulations 2002.

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	• any new advice emerging from the Department of Health and Social Care relating to government policy for EMF exposure guidelines.	**ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** confirms there are no overhead electricity cables used or constructed as part of the Scheme. Section 20.6 of **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** sets out the embedded mitigation measures during the construction and operation of the Scheme to mitigate against any effects from EMFs. During construction this includes shielding electric fields from underground cables by the surrounding jacket and conducting soil, and installing 400 kV Grid Connection Cables in trenched up to 2 m deep. During operation the embedded mitigation measures include (but are not limited to): • the Scheme will be designed so that the maximum levels of electromagnetic radiation received at existing residential properties, places of work, and PRoWs, from the 400 kV Grid Connection Cables during operation will be below the International Commission on Non-Ionizing Radiation Protection (ICNIRP) reference levels, due to the distance from the receptors and minimum trench depths; • A minimum 10 m setback has been imposed between high sensitivity receptors (residential

Relevant Paragraph	Detail	Scheme Compliance
		dwellings and places of work) and 400 kV Grid Connection cables; and • As the Scheme has been designed to ensure that electromagnetic radiation is below ICNIRP reference levels, no further EMF mitigation measures are considered necessary. Section 20.6 of **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** concludes that through the use of the embedded mitigation measures and the implementation of well-established good industry practices, the Scheme will result in no significant residual adverse EMF effects on human health.

2025 NPS Accordance Tables

2025 NPS EN-1

Relevant Paragraph	Detail	Scheme Compliance
Scope of the Overarching National Policy Statement for Energy		
Paragraph 1.3.4	The Planning Act 2008 sets out the thresholds for nationally significant infrastructure projects (NSIPs) in the energy sector. The Act defines the following forms of energy infrastructure as being an NSIP: • **electricity generating stations (meeting the thresholds set out in the Planning Act 2008).** This includes onshore generating stations generating more than 50 megawatts (MW) in England and 350MW in Wales (but not onshore wind in Wales or electricity storage in England and Wales, except hydroelectric storage). When the Infrastructure Planning (Onshore Wind and Solar Generation) Order 2025 takes effect, proposed for 31 December 2025, this will include onshore wind and solar generating stations in England only where they generate more than 100MW. It also includes offshore generating stations generating more than 100MW offshore in territorial waters adjacent to England and within the English part of the Renewable Energy Zone, and those generating more than 350MW in territorial waters adjacent to Wales and the Welsh part of the Renewable Energy Zone (the Welsh Zone as defined by section 158 of the Government of Wales Act	It is noted that the NSIP threshold for electricity generating stations (including solar) has now been adjusted from 50MW to 100MW. The **Grid Connection Statement [EN010168/APP/7.5]** states the Scheme has secured a 500MW export connection at the Existing National Grid Substation and, whilst the exact export generation capacity of the Scheme will be determined by the detailed design, it would generate enough electricity to be over the 100MW threshold and still be classified as an NSIP. This is in line with 2025 NPS EN-1.

Relevant Paragraph	Detail	Scheme Compliance
	2006). For these types of infrastructure, this Overarching NPS (EN-1) in conjunction with any of the relevant technology specific NPSs will be the primary policy for Secretary of State decision making. • **large gas reception and liquefied natural gas (LNG) facilities and underground gas storage facilities (meeting the thresholds set out in the Planning Act 2008).** For this infrastructure, EN-1 in conjunction with EN-4 (for natural gas only) will be the primary policy for Secretary of State decision making. • **cross-country gas and oil pipe-lines and Gas Transporter pipe-lines (meeting the thresholds and conditions set out in the Planning Act 2008).** For this infrastructure, EN-1 in conjunction with EN-4 (for natural gas only) will be the primary policy for Secretary of State decision making. • **above ground electric lines at or above 132kV (meeting the thresholds set out in the Planning Act 2008).** For this infrastructure, EN-1 in conjunction with the Electricity Networks NPS (EN-5) will be the primary basis for Secretary of State decision making.	
Paragraph 1.6.2	The 2024 NPSs included transitional provisions between the 2011 and 2024 NPS which remain in place. The Secretary of State has decided that similar transition provisions should apply for the 2025 NPSs, so that for any application accepted for examination before the final publication of the approved 2025 amendments,	The 2025 versions of NPS EN-1, EN-3 and EN-5 were published on 06 January 2026. The DCO application was accepted by the Planning Inspectorate on 17 October 2025 **[PD-003].**

Relevant Paragraph	Detail	Scheme Compliance
	the 2024 suite of NPSs should have effect in accordance with the terms of those NPSs.	Paragraph 1.6.2 of the revised 2025 NPS EN-1 states that *…any application accepted for examination before the final publication of the approved 2025 amendments, the 2024 suite of NPSs should have effect in accordance with the terms of those NPSs.* As such, under transitional arrangements the 2024 NPSs apply to the DCO application.
Clean Power 2030 and Net Zero by 2050		
Paragraph 2.2.6	In December 2024 the government published the Clean Power 2030 Action Plan. The plan sets out infrastructure deployment pathways and generation capacity ranges that will ensure by 2030 clean sources produce at least 95% of Great Britain's generation, meeting the sixth Carbon Budget advice and pushing the country towards net zero 2050.	The **Statement of Need [EN010168/APP/7.1]** sets out that the Scheme, if consented, will deliver over 100MW of cheap, secure, and low carbon electricity which will help the UK achieve the targets set out in the Clean Power 2030 Action Plan and support the aim for the UK achieve its Sixth Carbon Budget commitments.
Meeting Clean Power 2030 and Net Zero		
Paragraphs 2.3.1 and 2.3.2	Making Britain a Clean Energy Superpower is one of the five missions set out by the government. The Clean Power 2030 Action Plan sets out the government's first major steps towards delivering the Clean Power 2030 Mission in partnership with the Scottish and Welsh government, industry and the public. Delivering our Clean Power 2030 Mission paves the way to decarbonising the wider economy by 2050 as we pursue the electrification of heat in buildings, transport,	The **Statement of Need [EN010168/APP/7.1]** sets out that the Scheme, if consented, will deliver over 100MW of cheap, secure, and low carbon electricity which will help the UK achieve the targets set out in the Clean Power 2030 Action Plan. This will support the decarbonisation of the wider economy by 2050 as other forms of electrification develop, including district heat networks.

Relevant Paragraph	Detail	Scheme Compliance
	and industry, enhancing the environment and quality of life, and protecting consumers from the global pricing volatility of fossil fuels.	
Paragraphs 2.3.4 and 2.3.5	Meeting the Clean Power 2030 Mission objectives necessitates a significant investment in new energy infrastructure, both large nationally significant developments and smaller-scale developments determined at a local level. This requirement for new energy infrastructure will present opportunities for the UK and contributes towards the creation of secure, well paid jobs in the UK's clean energy industry and building domestic supply chains. As set out in the Clean Power Action Plan, this will be driven through rapid deployment of low carbon generation, flexibility infrastructure, and electricity transmission infrastructure. The Action Plan sets out targets for the 2030 capacities of key technologies at a national and regional level.	The Scheme presents an opportunity to deploy low carbon electricity generation at scale, and quickly, to meet the Clean Power 2030 Mission. Subject to being granted development consent and following a final investment decision, the earliest construction could start is in 2027. Construction of the Solar PV Sites and Cable Route Corridor is likely to start in tandem. The installation of cable within the Cable Route Corridor would require up to approximately 18 months and the construction of the Solar PV Sites would require an estimated 24 months. The operation and maintenance phase is anticipated to commence in 2029. This will support in meeting the Clean Power 2030 Mission capacity ranges and decarbonise the power sector. Full details of the need for the Scheme are provided in the **Statement of Need [EN010168/APP/7.1]** and how it will help the UK achieve clean power and net zero targets.
Paragraphs 2.3.6 and 2.3.7	Securing affordable, homegrown and abundant renewable resources means we will be able to run our power system for increasing periods on low carbon generation, with renewables providing the vast majority of generation, and nuclear continuing to deliver a backbone of vital low carbon power. A clean power system will enable further electrification of demand sectors and therefore increased emissions reduction.	The **Statement of Need [EN010168/APP/7.1]** sets out that the Scheme, if consented, will deliver over 100MW of cheap, secure, and low carbon electricity which will help the UK achieve the targets set out in the Clean Power 2030 Action Plan (i.e. the target capacity range for solar of 45-47 GW by 2030) and stay on track to achieve net zero by 2050. Maximising the capacity of generation in the proposed location for the Scheme

Relevant Paragraph	Detail	Scheme Compliance
	Reducing emissions in large parts of transport, heating and industry could lead to more than half of total energy demand being met by clean electricity in 2050, up from 17 per cent in 2019, representing a doubling in demand for electricity.	represents a significant and commercially rational step forward in the fight against the global climate emergency.
Paragraph 3.2.1	The government's objectives for the energy system are to decarbonise power generation to meet the Clean Power 2030 Mission, ensuring our supply of energy always remains secure, reliable, affordable, and consistent with net zero emissions in 2050 for a wide range of future scenarios, including delivery of our carbon budgets and Nationally Determined Contributions.	The Scheme presents an opportunity to deploy low carbon electricity generation at scale, and quickly, to meet the Clean Power 2030 Mission. The **Statement of Need [EN010168/APP/7.1]** sets out further details on the Scheme and how it will help the UK achieve clean power and net zero targets.
Need		
Paragraph 3.2.3	The Clean Power 2030 Action Plan sets out a DESNZ 'Clean Power Capacity range' which is a range of possible installed capacities for each technology in 2030. The range reflects that there is no singular path to achieving clean power, but instead, that there are a range of scenarios that could get us there.	The Clean Power 2030 Action Plan sets a target capacity range for solar of 45-47 GW by 2030. The Scheme presents an opportunity to deploy low carbon electricity generation at scale, and quickly, to meet the Clean Power 2030 Mission contributing to the 45-47 GW target. The **Statement of Need [EN010168/APP/7.1]** sets out further details.
Paragraph 3.2.5	The government's strategic framework includes the Clean Power 2030 Action Plan and the pathways to 2030, the Strategic Spatial Energy Plan, and the Centralised Strategic Network Plan. These should be considered by applicants, together with other relevant considerations, and used to inform developments of new energy infrastructure projects.	The **Statement of Need [EN010168/APP/7.1]** and **Planning Statement [EN010168/APP/7.2]** set out how the Applicant has considered the Clean Power 2030 Action Plan, including utilising the last major grid connection available in the area of the Scheme that can be delivered pre-2030, and how the Scheme supports the targets therein, by providing an

Relevant Paragraph	Detail	Scheme Compliance
		opportunity to deploy low carbon electricity generation at scale, and quickly. The Strategic Spatial Energy Plan (SSEP) and Centralised Strategic Network Plan are in the early stages of development and are yet to be published. The SSEP is still in development, with the methodology published in May 2025. The final SSEP is not yet available it is expected the Scheme will align with the three primary duties of the SSEP, promoting Net Zero, to enable the government to deliver on its legally binding emissions targets; Efficiency and economy, promoting efficient, coordinated and economic electricity; and security and supply, ensuring security of supply for current and future consumers of electricity and gas.
Paragraph 3.3.19	The Clean Power 2030 Action Plan explains that in order to meet the Clean Power 2030 Mission target, Great Britain will need to generate enough clean power to meet our total annual electricity demand, backed up by unabated gas supply to be used only when essential. This means transitioning to an electricity system with the following characteristics in a typical weather year: • Clean sources produce at least as much power as Great Britain consumes in total, and; • Clean sources produce at least 95% of Great Britain's generation	The Scheme presents an opportunity to deploy low carbon electricity generation at scale, and quickly, to meet the Clean Power 2030 Mission. The **Statement of Need [EN010168/APP/7.1]** sets out further details on the Scheme and how it will help the UK achieve clean power and net zero targets.
Paragraph 3.3.20	We expect that delivering a clean power system with these characteristics will make Great Britain a net exporter of electricity and will reduce the carbon	The Scheme presents an opportunity to deploy low carbon electricity generation at scale, and quickly, to meet the Clean Power 2030 Mission. The **Statement**

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	intensity of electricity generation from 171gCO2e/kWh in 2023 to well below 50gCO2e/kWh in 2030.	**of Need [EN010168/APP/7.1]** sets out further details on the Scheme and how it will help the UK achieve clean power and net zero targets.
Paragraph 3.3.25	Storage has a key role to play in meeting the Clean Power 2030 Mission, achieving net zero, and providing flexibility to the energy system, reducing the amount of generation and associated network that needs to be built to meet peak demand, helping Britain reach clean power in a cost-effective way and reducing delivery risk associated with other types of energy infrastructure.	The Scheme includes a Battery Energy Storage System (BESS) to provide more resilience and flexibility, releasing energy to the National Energy Transmission System when it is required as set out in **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]**. This allows the Scheme to store surplus electricity to be released at times of higher demand, improving efficiency. The BESS will assist in meeting the 2030 Clean Power Mission.
Paragraph 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.	The Scheme includes a BESS as detailed in **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** which will store surplus electricity in time of low demand to provide electricity when demand is higher.
Assessment Principles		
Paragraph 4.1.15	The Secretary of State should also consider spatial plans, such as the Strategic Spatial Energy Plan upon endorsement by all relevant governments.	The SSEP will work out the most suitable, amounts and energy infrastructure types the country needs to meet its future energy needs. To do this, experts will look at economic, environmental and technical factors. The SSEP is still in development, with the methodology published in May 2025. The final SSEP is not yet available however the Scheme it is expected the Scheme will align with the three primary duties of the SSEP, promoting Net Zero, to enable the government to deliver on its legally

Relevant Paragraph	Detail	Scheme Compliance
		binding emissions targets; Efficiency and economy, promoting efficient, coordinated and economic electricity; and security and supply, ensuring security of supply for current and future consumers of electricity and gas.
Paragraph 4.2.6	Before applications are made applicants are required to carry out preapplication consultation on their proposals. The Planning Act 2008 requires only one such consultation, and proposals can change after that consultation without the need to reconsult, unless the project is so altered as to become a different project altogether. There is then further publicity, consultation and engagement within the formal Planning Act process.	In accordance with the Planning Act 2008, the Applicant has carried out non-statutory, statutory and further targeted consultation on the Scheme at the pre-application stage. Further details are set out in the **Consultation Report [EN010168/APP/5.1]**.
Paragraph 4.2.7	We recommend that applicants consider additional consents, licences and permit requirements at the earliest possible stage. Applicants should consider parallel tracking of the environmental permitting and planning applications, and engaging with the Environment Agency's (EA) permitting pre-application service to help ensure that project design considers the requirements of the environmental permitting regime at the earliest opportunity.	The DCO, if granted, has the effect of providing consent for development in addition to a range of other consents and licences where specified, as well as removing the need for some consents such as planning permission. The Applicant has engaged with the Environment Agency's permitting pre-application service and details of the consents and licences included in the **Draft DCO [EN010168/APP/3.1]** are explained in the **Explanatory Memorandum [EN010168/APP/3.2]** and the **Consents and Agreement Position Statement [EN010168/APP/7.7].** The latter also includes a list of likely consents to be sought outside the DCO process, such as the Electricity Generation Licence to be granted by the Office of Gas and Electricity Markets.

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Paragraph 4.2.8	Where it is required by law at the pre-application consultation stage, preliminary environmental information should be provided. This information should be enough for statutory advisors to develop an informed view of the likely significant environmental effects of the development. It is not expected to be the full, finalised Environmental Statement.	At statutory consultation, the Applicant published a Preliminary Environmental Information Report (PEIR) with sufficient information for statutory advisors to develop an informed view of the likely significant environmental effects of the Scheme. Further details of consultation, including at PEIR stage, are set out in the **Consultation Report [EN010168/APP/5.1].**
Paragraph 4.2.9	While applicants may carry out further non-statutory consultation, these should serve a clear purpose and be focused and targeted at ensuring the project is ready for the statutory consultation. Applicants should avoid using these repeated consultations to test the minimum level of mitigation and compensation for impacts. Instead, mitigations should be built in from the start. For this reason, early engagement with relevant statutory consultees is recommended and applicants should maintain this engagement throughout pre-application. This ensures that issues are identified and addressed as early as possible.	The Applicant has carried out non-statutory consultation during the pre-application stage with the aim being to introduce Island Green Power and present the emerging proposals for the Scheme; giving people living and working in the area and/or interested people and stakeholders the opportunity to share their views and local knowledge to help inform and influence the proposals from an early stage in the development process. Statutory consultation and a further targeted consultation on the Scheme were held during the pre-application stage. Full details are provided in the **Consultation Report [EN010168/APP/5.1]**. The consultations undertaken were not used to test the minimum level of mitigation and compensation for impacts. These have been considered and developed from the beginning of the site selection process, including through the consideration of planning and environmental constraints as set out in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3]**, but also through early

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		engagement with relevant statutory consultees as set out in the **Consultation Report [EN010168/APP/5.1]** and relevant technical chapters of the ES.
Paragraph 4.2.10	Objections to the adequacy of pre-application consultation must be fair, accurate and not based on the objector's view of the underlying scheme. So long as an applicant has acted reasonably and met the statutory requirements there should be no objections to the adequacy of the consultation process.	The Applicant has carried out non-statutory, statutory and further targeted consultation on the Scheme at the pre-application stage. The Applicant submitted an Adequacy of Consultation Milestone (AoCM) Report to the Planning Inspectorate on 19 June 2025 which set out the pre-application consultation the Applicant undertook, compliance with the Planning Act 2008, compliance with the Statement of Community Consultation, and consideration of feedback. In providing feedback on the AoCM, Wiltshire Council (the host authority) confirmed that, without prejudice as to its views on the Project as a whole, the AoCM accurately and correctly describes consultation undertaken for the Project. The **Consultation Report [EN010168/APP/5.1]** describes the consultation process carried out for the Scheme, including how feedback has been taken into account.
Paragraph 4.2.12	Applicants must ensure that applications are ready to be examined before an application is made. The Planning Act system is designed to be frontloaded and applications should not enter the statutory system if they not ready to be consented. Examining Authorities, and indeed Secretaries of State, should be focused on considering the planning merits of an application, and not using time during the examination and decision-making stages seeking to address deficiencies in an application. Applicants and affected parties should	The application for development consent is considered ready for examination. The Applicant is negotiating Protective Provisions with relevant affected parties as detailed in Schedule 15 of the **Draft DCO [EN010168/APP/3.1]**.

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	ensure that protective provisions have been agreed ahead of statutory deadlines.	
Paragraph 4.2.13	Applicants and their consultants and advisors must ensure that their applications are clear and accessible to both the public and decision makers. Applications should be proportional, clear and focussed in order to ensure the planning process can move at the pace required to meet the Clean Power 2030 Mission.. Applicants must ensure their applications are concise whilst still containing the necessary, high quality, information the Examining Authority, statutory consultees and the Secretary of State expect to see in order to make an informed decision. The ES should therefore be proportionate and focused, with just the sufficient detail required to identify clearly the likely significant effects from the proposal.	The application includes a proportionate and focused ES setting out the identification of likely significant effects of the Scheme, and the mitigation measures considered to address these. The ES includes a non-technical summary, set out at **[EN010168/APP/6.4]**.
Paragraph 4.2.14	With the increasing number of development consent applications coming forward, this will put pressure on existing systems within the NSIP regime. It's therefore important that all parts of the system work together with a common purpose to ensure that the impacts of projects are properly assessed and mitigated so that good quality schemes are consented. LPAs and statutory advisors need the best and most assessable information from applicants so that they can easily spot all the relevant issues, agree the majority of those issues early and focus their attention on any controversial issues. Applicants providing tracked change versions of amended documents alongside the clean versions is encouraged. Applicants should see	During examination, the Applicant will be providing tracked change versions of amended documents alongside the clean versions. The Applicant has engaged collaboratively with the LPAs during the pre-application phase as set out within the relevant technical chapters of **ES Volume 1 [EN010168/APP/6.1]** and the **Consultation Report [EN010168/APP/5.1]**. A monthly Steering Group meeting is held with Wiltshire Council Officers to provide project and programme updates and hold technical discussions, if required.

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	their relationships with LPAs and statutory advisors as a valuable collaborative one.	
Paragraph 4.2.15	Similarly, applicants, consultees, examiners and decision makers, and all their legal teams must work together to streamline the formal DCO itself. Too much time is spent amending what should be more or less standard DCO provisions. Applicants should seek to take a standard approach to issues like compulsory purchase powers, the discharge of requirements and arbitration. Subtle changes should not be introduced to make a development easier to carry out and standard articles, such as those on human remains and mineral rights should only be used where there is a known burial ground or mineral rights holder.	The **Explanatory Memorandum [EN010168/APP/3.2]** contains, and identifies, drafting that takes precedent from recently made DCOs, demonstrating that the drafting is both relevant and consistent with current DCO drafting practices. As set out in the **Statement of Reasons [EN010168/APP/4.1]**, the Applicant has taken a standard approach to issues like compulsory purchase powers. The Applicant has been seeking to acquire the relevant land, new rights and temporary use of land by voluntary agreement, in order to ensure implementation of the Scheme. Whilst seeking compulsory acquisition powers, the Applicant will continue to seek to acquire the land, the rights and other interests in, on and over the land, the temporary use of land, as well as secure the removal of matters affecting the Order land that may impede the Scheme, by agreement wherever possible.
Paragraph 4.2.24	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. Measures that result in a material reduction in generation capacity for CNP infrastructure are unlikely to be considered to be appropriate as mitigation. There	The mitigation hierarchy has been applied throughout the design and development of the Scheme. This has resulted in a Scheme with limited significant and residual effects, with those that cannot be avoided, reduced or mitigated set out in the **ES [EN010168/APP/6.1/6.2/6.3/6.4]**.

Relevant Paragraph	Detail	Scheme Compliance
	may be exceptional circumstances where the mitigation could have a significant benefit and warrant a small reduction in generation capacity and function. In these circumstances, the Secretary of State may decide that the benefits of the mitigation to reduce the effects outweigh the marginal loss of function.	The Applicant notes that, measures that result in a material reduction in generation capacity for CNP infrastructure are unlikely to be considered to be appropriate as mitigation. As demonstrated in **Design Approach Document [EN010168/APP/7.3]** panels have been removed from the Scheme throughout the design process, for example panels closest to the Cotswolds National Landscape were removed to reduce the impacts of the Scheme.
Greenhouse Gas Emissions		
Paragraph 5.3.3	As discussed in Part 2, energy infrastructure plays a vital role in decarbonisation. All steps should be taken to reduce and mitigate climate change impacts, including by improving resource and energy efficiency in the construction, operation, and decommissioning of energy infrastructure where possible. However, it is accepted that there will be some residual emissions from energy infrastructure, particularly during the economy wide transition to net zero, and potentially beyond.	**ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** assesses the GHG emissions likely produced through the construction, operation and maintenance and decommissioning phases of the Scheme. Whilst the Scheme's construction does result in increased GHG emissions, the conclusion of the assessment is that, overall, the Scheme is likely to result in significant and beneficial residual effects for the whole Scheme lifecycle due to the clean energy produced by the Scheme, which will provide a net reduction in GHG emissions compared to a scenario without the Scheme.
Resource and Waste Management		
Paragraph 5.15.9	The applicant must consider the Circular Economy and how to ensure that their project aligns with the government's circular economy ambitions. In Wales applicants are encouraged to refer to 'Towards Zero Waste: Our Waste Strategy for Wales.	**ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** presents the findings of the assessment of likely effects of the Scheme on materials and waste for the construction, operation and maintenance and decommissioning phases. In accordance with the waste hierarchy, the Scheme will

Relevant Paragraph	Detail	Scheme Compliance
		prioritise waste prevention, followed by preparation for reuse, recycling, and recovery, with landfill disposal as the last resort. The **Outline CEMP [EN010168/APP/7.12]** and **Outline SWMP [EN010168/APP/7.16]** set out: • The waste streams that will be generated; • How the waste hierarchy will be applied to these wastes, including measures for recycling; • Good practice measures for managing waste; and • Roles and responsibilities for waste management. These will be secured by Requirements of Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**. With the incorporation of mitigation measures, **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** concludes that no significant effects in relation to waste have been identified in relation to the Scheme. The following mitigation measures will be implemented during the design and construction phases of the Scheme, where technically, economically and environmentally practicable: • manage waste in accordance with the waste hierarchy; • design out and prevent waste arising;

Relevant Paragraph	Detail	Scheme Compliance
		• reuse excavated materials within the Scheme; • divert waste from landfill through off-site recycling and recovery; and • use recycled and secondary aggregates (alternative materials) in the construction of the Scheme.
Paragraph 5.15.12	Applicants are also encouraged to prepare a materials management plan to inform the use of construction best practices in relation to storing materials in an adequate and protected place on site to prevent waste, or degeneration of valuable materials, for example, from accidental damage or excessive weathering. The use of Building Information Management tools (BIM, or similar) to record the materials used in construction can help to reduce waste and realise further value in future decommissioning of facilities, by identifying materials that can be recycled or reused.	To minimise waste, **ES Volume 1, Chapter 20 [EN010168/APP/6.1]** and the **Outline SWMP [EN010168/APP/7.16]** confirm that suitable excavated materials will be stored and reused on-site, as determined through a post-consent Materials Management Plan (MMP), prepared in line with the CL:AIRE Definition of Waste Code of Practice or relevant permitting.
Water Quality and Resources		
Paragraph 5.16.4	The applicant should make early contact with the relevant regulators, including the local authority, the EA and Marine Management Organisation, where appropriate, for relevant licensing and environmental permitting requirements. Applicants should make early contact with the EA, NRW and water companies with their proposed water requirements to understand whether water is available and if new water infrastructure is required. If insufficient water is available for abstraction the EA and NRW will be unable to authorise an abstraction licence.	Table 11-2 of **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** sets out details of the engagement undertaken by the Applicant, including with the Environment Agency and relevant local authority. Topics consulted on included, but were not limited to, watercourse identification, flood risk, flood mapping, and drainage. Statutory consultation was held between 29 January 2025 and 19 March 2025. A full list of consultation responses in relation to Hydrology, Flood Risk and

Relevant Paragraph	Detail	Scheme Compliance
		Drainage are presented in the **Consultation Report [EN010168/APP/5.1]** submitted as part of the Application.
Paragraph 5.16.6	Applicants should avoid locating potentially polluting activities in the most sensitive locations for groundwater, in particular Source Protection Zone 1 (SPZ) and close to nationally important drinking water supplies. Applicants should consider implementing protective measures to control the risk of pollution to groundwater, for example, through the use of protective barriers.	**ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1]** details the assessment of the likely significant effects on ground conditions, including the potential for pollution to source protection zones as a result of the Scheme. The assessment concludes with the implementation of embedded and additional mitigation measures, that there are no residual significant effects anticipated. The Preliminary Risk Assessment has identified controlled waters receptors such as Source Protection Zones, which could potentially be at risk from contaminant sources (see Table 19-4 of **ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1]**). However, no significant risks are anticipated once suitable mitigation is applied. For example, preparation of a detailed Hydrogeological Risk Assessment would be undertaken in consultation with the Environment Agency should it be necessary during construction, or bunding BESS area and substation sites to retain firefighting substances used to control fire (see Table 19-5). Construction, operational and decommissioning phase impacts to controlled waters will be mitigated through the **Outline CEMP [EN010168/APP/7.12], Outline Operation**

Relevant Paragraph	Detail	Scheme Compliance
		Environmental Management Plan [EN010168/APP/7.13] and **Outline Decommissioning Strategy [EN010168/APP/7.14]**. These will be secured by Requirements of Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**.
Paragraph 5.16.9	If insufficient water is available for abstraction, the applicant will need to find alternative sources of water to be able to proceed, whether this is developing their own source or collaborating with the water industry or other water abstractors to develop a joint source.	The **Outline Water Resources Assessment [EN010168/APP/7.25]** identifies and assesses the potential sources of water for the Scheme and concludes that there are feasible and sufficient water sources to supply the estimated water demand for the Scheme. Both a mains water connection in Lime Down A and possible water tankering provide a viable solution to supply the modelled water demands for the Scheme.

2025 NPS EN-3

Relevant Paragraph	Detail	Scheme Compliance
Solar Photovoltaic Generation		
Paragraph 2.10.1	The UK has huge potential for solar power: it is a cheap, versatile, and effective technology.	The Scheme presents an opportunity to draw on the UK's potential for solar power and deploy low carbon electricity generation at scale, and quickly, to meet the Clean Power 2030 Mission. The **Statement of Need [EN010168/APP/7.1]** sets out further details of the need case for the Scheme and how it will help the UK achieve clean power and net zero targets.

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 2.10.2	Solar energy is at the heart of our Clean Power 2030 Mission. The government is committed to working with industry to radically increase our existing solar capacity by 2030 to boost growth across the country, create thousands of high-skill, future-proofed jobs and tackle the climate crisis.	The **Statement of Need [EN010168/APP/7.1]** sets out that the Scheme, if consented, will deliver large amounts of cheap, secure, and low carbon electricity which will help the UK achieve the targets set out in the Clean Power 2030 Action Plan (i.e. the target capacity range for solar of 45-47 GW by 2030) and stay on track to achieve net zero by 2050. The Scheme is anticipated to create 268 Full Time Equivalent (FTE) per annum with the estimated on-site construction workforce expected to peak at approximately 692 total employees (gross direct employment) during the construction phase. During operation, 15 permanent jobs would be generated. In a peak replacement scenario, 125 FTE are required and in the decommissioning phase up to a gross of 214 FTE employees per annum are estimated. Job creation provides employment and skills. Benefits and further enhancement measures are proposed and set out in the **Outline SSCEP [EN010168/APP/7.20]**. This will be secured by Requirement 18 of Schedule 2 of the **Draft DCO [EN010168/APP/3.1].**
Paragraph 2.10.3	The Clean Power 2030 Action Plan sets out a deployment range for solar PV of between 45 – 47GW by 2030 with scope to exceed the clean power capacity range, subject to system need, noting the potential of rooftop solar to boost deployment.	The **Statement of Need [EN010168/APP/7.1]** sets out that the Scheme, if consented, will deliver over 100megawatts of cheap, secure, and low carbon electricity which will help the UK achieve the targets set out in the Clean Power 2030 Action Plan (i.e. the target capacity range for solar of 45-47 GW by 2030) and stay on track to achieve net zero by 2050. Maximising the capacity of generation in the proposed location for the Scheme represents a significant and

Relevant Paragraph	Detail	Scheme Compliance
		commercially rational step forward in tackling the climate crisis.
Agricultural Land Classification and Land Type		
Paragraph 2.10.26	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. This should include consideration of mitigation against impacts to peat soils where these are present.	The added wording in 2025 NPS EN-3 relates to mitigation against impacts to peat, where peat is present. Soil surveys are contained within **ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resource Survey Report [EN010168/APP/6.3]**. There are no areas of peat present within the Order Limits. The **Outline Soil Resources Management Plan [EN010168/APP/7.15]** sets out measures to manage soils sustainably and minimise adverse impacts on soil health and potential land contamination, alongside the **Outline CEMP [EN010168/APP/7.12]**. These will be secured by Requirements of Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**. The full list of relevant policy and guidance is set out in Section 1.2 of the **Outline Soil Resources Management Plan [EN010168/APP/7.15]**.
Paragraph 2.10.119	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	The added wording in 2025 NPS EN-3 relates to mitigation against impacts to peat, and states that mitigation measures should include water table management and minimising soil disturbance where peat is present. Soil surveys are contained within **ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resource Survey Report**

Relevant Paragraph	Detail	Scheme Compliance
	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. Mitigation of impacts to peat soils should include water table management and minimising soil disturbance.	**[EN010168/APP/6.3]**. There are no areas of peat present within the Order Limits. More generally, mitigation measures to preserve soil health and soil structure are set out in the **Outline Soil Resources Management Plan [EN010168/APP/7.15]**, alongside the **Outline CEMP [EN010168/APP/7.12]**. These measures include how stockpiles will be designed, specific measures for managing sensitive soils, and the approach to reinstating soil. These will be secured by Requirements of Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**.
Landscape. Visual and Residential Amenity		
Paragraph 2.10.89	Applicants should carry out a landscape and visual assessment (LVIA) and report it in the ES. Photomontage visualisations may be required to demonstrate the effects of a proposed solar farm, on sensitive or valued landscapes, particularly designated landscapes, the setting of heritage assets and any nearby residential areas or viewpoints.	The new wording in 2025 NPS EN-3 may require photomontages on “sensitive or valued landscapes, particularly designated landscapes”. The LVIA for the Scheme is detailed in **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** and its accompanying appendices. This includes photomontages to demonstrate the effects of the Scheme on sensitive or valued landscapes, particularly designated landscapes, the setting of heritage assets and any nearby residential areas or viewpoints, these are included in **ES Volume 2, Figure 8-14: Baseline Photography and Photomontages [EN010168/APP/6.2]**. Effects on the setting of the Cotswolds National Landscape are provided in a separate assessment in **ES Volume 3, Appendix 8-6: LVIA Assessment of the Special Qualities of the Cotswold National Landscape [EN010168/APP/6.3]**.

Relevant Paragraph	Detail	Scheme Compliance
Construction including Traffic and Transport Noise and Vibration		
Paragraph 2.10.118	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 vision-led transport assessment to manage cumulative impacts as part of the ES. This should consider the impacts of abnormal traffic movements relating to the project in question in combination with those from any other relevant development. Consultation with the relevant local highways authorities is likely to be necessary	The new wording in 2025 NPS EN-3 provides that applicants should include a "vision-led" transport assessment to manage cumulative impacts as part of the ES. With regard to the vision-led approach, the **Design Approach Document [EN010168/APP/7.3]** describes the project Design Principles, one of which is to ensure that the Scheme is "*carefully designed to minimise where practicable impacts on amenity, including traffic impacts"*. Transport impacts have been part of the overall design vision for the Scheme and have shaped its design evolution. **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** provides details of the alternative construction routes that have been considered in the Scheme's design evolution to avoid adverse impacts on the Cotswolds National Landscape (CNL), with details of why the route chosen through the CNL is considered to be most appropriate to minimise traffic impacts. Section 13.2 of **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** provide details of consultation undertaken by the Applicant in relation to transport and access. Table 13-2 of **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** confirms that the Council's

Relevant Paragraph	Detail	Scheme Compliance
		Highways Officer is content that the assessment of in-combination cumulative effects is sound. Section 13.13 of **Chapter 13: Transport and Access [EN010168/APP/6.1]** provides details of the cumulative assessment for transport and access, with Section 13.14 concluding that there will be no residual significant effects resulting from transport and access.

August 2026 National Planning Policy Framework

Relevant Policy or Paragraph	Detail	Scheme Compliance
Chapter 4. Achieving sustainable development		
Paragraph 16: Sustainable development **Policy S3: Presumption in favour of sustainable development**	Paragraph 16 sets out, "At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs." in reference to Resolution 42/187 of the United Nations General Assembly. Policy S3 sets out a 'presumption in favour of sustainable development:' 1. Decisions on development proposals should apply a presumption in favour of sustainable development. This means: a. Policy S4 in this Framework should be applied when considering development proposals within settlements; b. Outside settlements, policy S5 should be applied; and c. In all locations, development proposals that accord with both an up-to-date development plan and the decision-making policies in this Framework should be approved without delay. 2. Where a development proposal falls partly within and partly outside a settlement, policies S4 and S5 should be applied to the relevant parts which are	The **Statement of Need [REP1-085]** and Section 5 of the **Planning Statement [REP3-081]** set out that if consented, the Scheme will deliver large amounts secure and low carbon electricity over its 60-year operational lifetime in line with government targets and priorities including the Clean Power 2030 Action Plan. The **Design Approach Document [APP-268]** demonstrates how the Scheme will result in sustainable infrastructure that is sensitive to place by delivering a design that has followed the mitigation hierarchy to avoid and reduce impacts as far as possible, integrates with the landscape, provides ecological and landscape enhancements and improves recreational facilities in the area through the creation of 12.8 km of new permissive paths, which will be open up to 365 days per calendar year throughout the proposed 60-year operational lifetime of the Scheme. The **Planning Statement [REP3-081]** and **Annex A and B National and Local Policy Accordance Tables** of the **Planning Statement [REP3-081]** consider the Schemes compliance with relevant planning policies. The Schemes compliance with Policy S5 is addressed below.

Relevant Policy or Paragraph	Detail	Scheme Compliance
	inside or outside of the settlement boundary (as appropriate), before coming to an overall view on the proposal.	
Policy S5: Principle of development outside settlements	1. Only certain forms of development should be approved outside settlements, as set out in the following list. These should be approved, unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework: a. Development for: agriculture, horticulture and forestry; outdoor sport and recreation; allotments; cemeteries and burial grounds; mineral extraction and processing; engineering operations and infrastructure (including for transport, energy, water and telecommunications); roadside facilities in accordance with policy TR5; national defence and security; or which is solely for nature conservation, restoration and/or enhancement; b. Development for rural businesses and services, including tourism, where a location outside settlements is shown to be necessary; c. The reuse, extension, alteration or replacement of an existing building, provided that the existing building is of permanent and substantial construction, is lawful in planning terms, and any extension or alteration will	Due to the nature of the Scheme as a large scale solar infrastructure project, it falls outside of the settlement boundaries. Policy S5 states that certain types of development should be approved outside of settlements, including energy infrastructure (point 1a of Policy S5). Further, NPS EN-1 paragraph 4.1.7 identifies solar projects such as the Scheme as Critical National Priority infrastructure. As detailed in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056], ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** and the **Design Approach Document [APP-268]** the Applicant has undertaken extensive engagement with National Grid to identify an appropriate point of connection. The Existing National Grid Melksham Substation was identified as having available capacity for a utility scale energy project such as the Scheme. **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** and **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** sets out the six-stage approach used by the Applicant to identify the proposed location for the Scheme. The Site Selection Assessment Report concludes that there are no more suitable and available locations within the 20 km search area

	not result in a disproportionate increase in size compared to the existing building. In the case of proposals for a replacement building, it should be for the same use and not disproportionately larger than the one it replaces; d. The redevelopment of previously developed land (including a material change of use to residential or mixed-use including residential); e. Limited infilling within groups of houses; f. An exception site as provided for in policy HO10, or development brought forward under a Community Right to Build Order or Neighbourhood Development Order; g. Development which would address an evidenced unmet need for gypsy, traveller or travelling showpeople accommodation, provided it meets the criteria in policy HO12; h. Residential and mixed-use development which would: i. Be within reasonable walking distance of a well-connected station (applying the definitions in the glossary at Annex B); ii. Be physically well-related to the station or the settlement within which the station is located; iii. Be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure; and	of the Existing National Grid Melksham Substation than the proposed location for the Scheme and that the Scheme's location is therefore assessed to be suitable for the scale of solar development proposed. As set out in the **Design Approach Document [APP-268]** the site selection process was strongly influenced by the need to deliver good design. The Scheme has been developed through an iterative design process undertaken in response to consultation and in accordance with the mitigation hierarchy to avoid, reduce and mitigate adverse effects on the environment. The assessments set out in the various chapters of the **ES** detail what impacts are expected as a result of the Scheme based on the minimum and maximum parameters of the Scheme, and the mitigation and enhancement measures that are proposed to reduce these impacts. The **Planning Statement [REP3-081]** considers the adverse and beneficial effects of the Scheme in the application of the planning balance and concludes that the benefits of the Scheme outweigh the residual adverse impacts identified. The benefits of the Scheme are set out in Section 5.3 of the **Planning Statement [REP3-081]** and include the delivery of large amounts of affordable, secure, and low carbon electricity which will help the UK to achieve net zero by 2050, ecological and landscape enhancements, biodiversity net gain, permissive paths, employment generation, economic benefits and skills training.

	iv. Not prejudice any proposals for long-term comprehensive development in the same location. i. The development of land allocated for that purpose in the development plan (where this lies outside settlements); and j. Development which would address an evidenced unmet need (including, but not limited to, development proposals involving the provision of housing where the local planning authority cannot demonstrate a five year supply of deliverable housing sites or scores below 75% in the most recent Housing Delivery Test), and where the development would: i. Be physically well-related to an existing settlement (unless the nature of the development would make this inappropriate) and be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure; or ii. Comprise major development for freight and logistics purposes which accords with policy E3. 2. In applying this policy, the circumstances in which the benefits of approving development proposals are likely to be substantially outweighed by adverse effects include, but are not restricted to, situations where the development proposal would fail to comply with one of the national decision-making	

Relevant Policy or Paragraph	Detail	Scheme Compliance
	policies which state that development proposals should be refused in specific circumstances. 3. Development proposals comprising isolated homes, which are those lying outside settlements or groups of houses, should not be approved other than in accordance with policy HO11. 4. Development proposals which do not fall within one of the categories set out in this policy should only be approved in exceptional circumstances, where the benefits of the proposal would substantially outweigh the adverse effects, including to the character of the countryside and in relation to promoting sustainable patterns of movement. 5. This policy does not apply to development proposals in the Green Belt or on land designated as Local Green Space, which should instead be determined in accordance with policies HC8, GB6, GB7 and/or GB8 (as appropriate). However, where development would not be inappropriate in these locations (through the application of policies HC8 and GB7), proposals should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework, and applying paragraph 2 of this policy.	
Chapter 5. Meeting the challenge of climate change		

Relevant Policy or Paragraph	Detail	Scheme Compliance
Policy CC2: Mitigation of climate change	1. In order to contribute to climate change mitigation and the transition to net zero, development proposals should, where relevant to the proposal: a. Accord with policies TR3 and TR4 so that sustainable patterns of movement are prioritised, opportunities are taken to improve walking, wheeling, cycling and public transport, and infrastructure is provided to support the transition to zero-emission vehicles; b. Support good access to facilities in order to limit the need to travel, whether through the development's location, through development densities which improve catchment populations for local services, or by incorporating community facilities and premises to support local employment opportunities; c. Use design approaches which conserve energy and other resources in accordance with policy DP3(2)(b); d. Take advantage of opportunities to reuse existing structures and materials, including by reusing non-contaminated excavated soil and hardcore within the site; e. Take advantage of opportunities to draw low carbon energy from decentralised networks (such as district heat networks), where these are available, and to co-locate energy and	**Transport and Access** **ES Volume 1, Chapter 7: Climate Change [REP5-022]** sets out measures to minimise the need of construction staff to travel by private vehicle including encouraging the use of lower carbon modes of transport, communicating local bus connections and pedestrian and cycle access routes to/from the Scheme to all construction staff, providing appropriate facilities for the safe storage of cycles and implementing a shuttlebus to reduce the number of trips made by construction staff. Appendix C of the **Outline CTMP [REP6-041]** includes a Construction Worker Travel Plan to manage construction workers trips to the site. This includes measures to encourage travel to the site via sustainable travel where possible including measures for the provision of shuttle buses to transport construction workers to and from the Order Limits. This is particularly important for non-local workers, who are expected to stay in local accommodation and be transported to the Site. It will also be utilised by other workers as appropriate. It is expected that the shuttle bus will be able to accommodate 20 workers on average (shuttle buses are likely to be of varying size). In addition, workers who drive will be encouraged to car share where practicable. The Outline CTMP is secured through Requirement 15 of Schedule 2 of the **Draft DCO [REP6-005]**.

	heat generators and users, especially to take advantage of suppliers of surplus heat and energy; f. Contribute to the creation or restoration of habitats which can act as carbon stores, such as through woodland planting and peatland restoration, while avoiding harm to habitats which can act as important carbon stores, including peatland and salt marsh; and g. Not involve the extraction of fossil fuels unless it is in accordance with policy M5. 2. Substantial weight should be given to the benefits of improving the energy efficiency of existing buildings and/or drawing energy from district heat networks, renewable and low carbon sources (including through the installation of heat pumps and solar panels where these do not already benefit from permitted development rights) where this would be achieved through proposals for development.	Similar measures will be developed prior to the decommissioning phase for the use of lower-carbon and more climate change resilient methods and will be outlined in the **Outline Decommissioning Strategy [REP6-033]**. Detail about the measures is limited as the decommissioning environment beyond 2089 is likely to be considerably different to today. **Low Carbon Energy** The **Statement of Need [REP1-085]** sets out that the Scheme, if consented will deliver large amounts of secure, low carbon electricity which will help the UK achieve its Sixth Carbon Budget commitments and stay on track to achieve net zero by 2050. The need to mitigate and adapt to climate change has been considered throughout the design of the Scheme. **ES Volume 1, Chapter 7: Climate Change [REP5-022]** has considered the direct and indirect impacts of climate change in terms of water shortages, storms, heatwaves and wildfires. The Scheme has been designed, as far as practicable, to avoid and reduce impacts and effects on Climate Change and to increase Climate Change resilience through the process embedding measures into the design. In addition, how the Scheme is constructed, operated and maintained, and decommissioned would be controlled through measures secured in the DCO in order to manage and minimise potential environmental effects (required as a result of

Relevant Policy or Paragraph	Detail	Scheme Compliance
		legislative requirements and/or standard sectoral practices). Table 7-34 and 7-35 of **ES Volume 1, Chapter 7: Climate Change [REP5-022]** sets out that following embedded mitigation measures and those set out in the **Outline CEMP [REP6-029]**, no significant impacts will occur from these direct impacts during the construction, operation and decommissioning of the Scheme. Furthermore, as set out in **ES Volume 1, Chapter 3: The Scheme [APP-055]**, BESS is incorporated into the Scheme as associated development. This allows electricity generated from the Solar PV Panels or excess energy from the grid to be stored in the batteries and exported at strategic times of the day to provide flexibility and enhance grid reliability. **Reuse of Materials** The Scheme has also been designed and will be constructed and operated 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 Scheme during its use. To manage waste during the construction, operation and decommissioning stages, measures are set out in the **Outline SWMP [REP6-035]**, **Outline OEMP [REP6-031]** and **Outline Decommissioning Strategy [REP6-033]** which are secured under Requirements in Schedule 2 of the **Draft**

Relevant Policy or Paragraph	Detail	Scheme Compliance
		DCO [REP6-005]. The approach is to ensure that opportunities are sought for waste minimisation, reuse, recycling and recovery in line with the requirements of the waste hierarchy. Furthermore, **ES Volume 1, Chapter 20: Other Environmental Matters [REP5-028]** and the **Outline SWMP [REP6-035]** confirm that suitable excavated materials will be reused on-site, as determined through a post-consent Materials Management Plan, prepared in line with the CL:AIRE Definition of Waste Code of Practice or relevant permitting. **Habitats** The Scheme incorporates nature-based solutions into its design to offset and mitigate the impact of greenhouse gas emissions. The rationale for all nature-based mitigation is set out in **ES Volume 1, Chapter 9: Ecology [REP4-010]**, with enhancements further detailed in the **Outline LEMP [REP6-037]**. These include substantial new hedgerow and tree planting, reinforcement planting at existing hedgerows and field boundaries, extensive grassland habitat creation and sympathetic management both within buffers and within the arrays, as well as discrete, valuable habitat creation (e.g. ponds and meadows) in appropriate locations. These measures are secured in the **Outline LEMP [REP6-037]**, to be secured by Requirement 7 in Schedule 2 to the **Draft DCO [REP6-005]**.

Relevant Policy or Paragraph	Detail	Scheme Compliance
		<u>Fossil Fuels</u> The Scheme does not involve the extraction of fossil fuels, as explained in the **Statement of Need [REP1-085]**, the Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure, and low carbon electricity.
Policy CC3: Adaption to climate change	1. Development proposals should take into account the current and potential impacts of climate change over the lifetime of the scheme, and in order to minimise vulnerability to these impacts should, where relevant to the proposal: a. Be located where the risk of flooding is minimised, or can be managed and the development made safe without increasing risk elsewhere, in accordance with policies F4, F5, F6, F7 and F8; b. Comply with policy F9 where development would be located in an area vulnerable to coastal change, as specified in that policy; c. Incorporate sustainable drainage systems to manage surface water flow rates and reduce volumes of runoff in accordance with policy F8; d. Use design approaches which minimise risks from overheating in accordance with policy DP3(2)(b), and include green infrastructure and suitable tree planting in	An assessment of the effects of the Scheme on flood risk both within the Site and the surrounding area is provided in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012]**, with supporting information provided in **ES Volume 3, Appendix 11-1 to Appendix 11-9: Flood Risk Assessment and Outline Drainage Strategy [REP4-021], [REP5-047]** to **[REP5-060]** and **[REP3-064]**. The assessment concludes that, following the implementation of embedded and additional mitigation measures in the design of the Scheme, the effects from flooding are considered not significant. Furthermore, the Scheme would not result in a material increase in off-site flood risk and any on-site flood risk would be managed such that the Scheme remains safe and operable for its lifetime. Measures to manage surface water runoff and drainage are set out in the outline drainage and construction management plans (**ES Volume 3, Appendix 11-1 to 11-9: Flood Risk Assessment and Outline Drainage Strategy [REP4-021], [REP5-047]** to **[REP5-060]** and **[REP3-064], and Outline CEMP [EREP6-029]**) and secured through Schedule 2 of the

	accordance with policies DP3(2)(c) and N3; and e. Incorporate proportionate measures to mitigate against wildfires, where opportunities to do so exist and wildfires pose a particular risk (for example as a result of the combined effect of topography, prevailing wind direction and being located within or adjacent to heavily vegetated areas). Such measures should be designed to limit fuel loads for fires, and to create defendable spaces, such as by avoiding timber panel fences and incorporating firebreaks into development layouts and planting schemes. 2. Substantial weight should be given to the benefits of improving the resilience of existing buildings and public spaces to anticipated climate change impacts where this would be achieved through proposals for development.	**Draft DCO [REP6-005]**. Where drainage measures are necessary, these include permeable surfacing, infiltration features, swales and attenuation storage to manage surface water and maintain greenfield runoff behaviour, as applicable. The Scheme's compliance with the relevant flood risk policies of the NPPF is set out in the corresponding rows of the table below. **ES Volume 1, Chapter 7: Climate Change [REP5-022]** has taken account of the projected impacts of climate change and sets out mitigation measures embedded into the design of the Scheme during construction, operation and decommissioning. This includes (but is not limited to): • Locating associated electrical infrastructure, including substations and conversion units sequentially to areas with a 'low' probability of flooding where practicable. • Less-flood sensitive infrastructure forming the wider Scheme (Solar PV Panels and cabling) will be sequentially located outside the 1 in 100 plus climate change annual probability extent (1% +CC) or where this is not practicable restricted to areas which would experience less than 1m depth of flooding during the same event. • For both fixed and tracker panels, all sensitive and electrical equipment on the Solar PV Panel will be elevated by the legs (including the solar panel face itself) so that it is no less than 0.6 metres above the surrounding peak flood level; and

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		• Tracker panel units will be mounted on raised frames (raised a minimum of 0.4 metres when on maximum rotation angle) and will therefore be raised above surrounding ground levels and fitted with a tracking system. During times of flooding, solar panels may be stowed by the tracking system algorithm onto a horizontal plane, to the minimum post height of 2.5 metres above ground level. This ensures that all sensitive and electrical equipment on the solar panel is raised to a minimum of 2.5 metres above ground level in the horizontal position. • BESS will include heating, ventilation and cooling systems to control the temperature and allow efficient operation during warmer conditions. Sustainable measures will be developed prior to the decommissioning phase for the use of lower-carbon and more climate change resilient methods. These are outlined in the **Outline Decommissioning Strategy [REP6-033]**. These measures are secured by Requirement 20 in Schedule 2 of the **Draft DCO [REP6-005]**. The **Outline LEMP [REP6-037]** sets out the landscaping and ecological mitigation and enhancement measures for the Scheme. The overarching aim of the **Outline LEMP [REP6-037]** is to set out prescriptions for habitat creation and management in order to provide ecological enhancements, strengthen the green infrastructure within the local area, and to provide landscape and visual mitigation through screening of the Scheme, where necessary. The

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		Outline LEMP [REP6-037] will be secured by Requirement 7 in Schedule 2 of the **Draft DCO [REP6-005]**. Significant tree and woodland planting is proposed within the Order Limits as set out in **ES Volume 1: Chapter 9: Ecology and Biodiversity [REP4-010]** and the **Outline LEMP [REP6-037],** which will result in the creation of approximately 11.04 ha of new native broadleaved woodland, 9.43 km of new lines of trees, and 15.90 km of new native hedgerows within the Order Limits, as well as considerable levels of planting elsewhere within the Scheme. Once established, this level of woodland planting will result in a significant beneficial effect on the extent of woodland within the Order Limits, which would by extension contribute to the connectivity of woodland stands and proliferation of green infrastructure across the local landscape. The direct and indirect impacts of climate change including wildfires are considered in **ES Volume 1, Chapter 7: Climate Change [REP5-022]**. Table 7-34 and 7-35 of **ES Volume 1, Chapter 7: Climate Change [REP5-022]** sets out the embedded mitigation measures, following the implementation of which, no significant impacts are anticipated to occur during the construction, operation (including maintenance) and decommissioning of the Scheme. These include (but are not limited to): • BESS Area systems will include HVAC systems which will be contained within the individual

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		equipment containers as well as other measures stated in the **Outline BSMP [REP3-106]**; and • Workers and staff will monitor forecasts and plan works accordingly as described in the **Outline CEMP [REP6-029]**. These measures will be secured through Requirements under Schedule 2 of the **Draft DCO [REP6-005]**.
Chapter 10. Securing clean energy and water		
Policy W3: Renewable and low carbon energy development and electricity network infrastructure	1. In considering proposals for renewable and low-carbon energy development and electricity network infrastructure, substantial weight should be given to: a. The benefits for improving energy security, supporting economic development and/or the transition to a net zero future; b. In the case of applications for the re-powering and life-extension of existing sites, the additional benefit of utilising an established site for this purpose; and c. The contribution that small-scale and community-led renewable and low carbon energy projects can make to reducing greenhouse gas emissions, along with their associated economic and social benefits. 2. Applicants should not be required to demonstrate the need for renewable or low carbon energy development and electricity network infrastructure. Where proposals for this form of development come	The **Statement of Need [REP1-085]** and Section 5 of the **Planning Statement [REP3-081]** set out the need for the Scheme and note the established need for low-carbon infrastructure as a Critical National Priority. There is an urgent for such schemes and Part 3 of NPS EN-1 explains the urgent need for significant amounts of large-scale energy infrastructure in meeting government's energy objectives. It is demonstrated within the **Planning Statement [REP3-081]** that any harm caused by the Scheme is outweighed by the substantial benefits that are delivered. It is considered that even without applying the CNP presumption, the planning case is firmly in favour of development consent being granted. At the end of the Scheme's operational life, all Solar PV Sites would be decommissioned and the land restored to its original use and condition as far as practicable. There will be opportunities for the retention of a range of biodiversity

	forward outside areas which have been identified as suitable for them in the development plan, their acceptability should be assessed against the national decision-making policies in this Framework, taken as a whole. 3. Where development is expected to be time-limited, applications should be accompanied by proposals for decommissioning and site restoration, including details of how these measures are expected to be implemented.	improvements, including established habitats, hedgerows and woodland, beyond the decommissioning of the Scheme, ultimately enhancing the ecological value of the area. The decommissioning of the Scheme has been assessed within the **ES** which considers the effects associated with decommissioning activities. As part of the assessment, appropriate mitigation measures are incorporated into the Scheme. Measures to manage and minimise disruption during decommissioning are set out in the **Outline Decommissioning Strategy [REP6-033]**. This explains how mitigation measures identified in the **ES** will be implemented during decommissioning and includes controls for working hours, noise, lighting, traffic management, pollution prevention, waste management and community liaison. The **Outline Decommissioning Strategy [REP6-033]** also confirms that decommissioning activities will be undertaken in phases over an anticipated 12–24-month period, with measures to coordinate traffic movements, control noise and vibration in accordance with best practicable means and manage temporary lighting to minimise effects on nearby receptors. All land will be returned to the landowner as quickly as is practicable after decommissioning. A detailed Decommissioning Strategy will be prepared substantially in accordance with the **Outline Decommissioning Strategy [REP6-033]** and must be submitted to and approved by the relevant local planning authority prior to the commencement of decommissioning. This is secured through Requirement 20 in Schedule 2 of the

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		Draft DCO [REP6-005]. In addition, the Applicant is seeking a time-limited consent for the Scheme to have an operational period of 60 years, with decommissioning to take place following cessation of operation. This is secured by Requirement 20 in Schedule 2 of the **Draft DCO [REP6-005]**.
Chapter 14. Achieving well-designed places		
Policy DP3: Key principles for well-designed places	1. Development proposals should respond to their context (the history, character and features of their site and its setting), so that they integrate with and enhance their surroundings; such as through the arrangement of development plots and buildings, the use of materials and architectural features, and the restoration, reuse and integration of heritage assets. This should not preclude innovation or change where appropriate, especially where an increased scale or density of development is justified in accordance with policies L2 and L3. 2. To create well-designed places, development proposals should also reflect relevant aspects of the following principles, as appropriate to the nature of the development and its location: a. Liveability: support healthy, mixed, vibrant and integrated communities, which will function well over the lifetime of the development, by incorporating a range of uses and tenures, employing features which	NPS EN-1 paragraph 4.7.2 recognises that the nature of energy infrastructure will often limit the extent to which it can contribute to the enhancement and quality of the area. Section 4.2 of the **Design and Approach Document [APP-268]** sets out the positive design outcomes that will deliver a Scheme that is sustainable and sensitive to place over the lifetime of the development. The **Design Approach Document [APP-268]** demonstrates how the Scheme will result in sustainable infrastructure that is sensitive to place by delivering a design that has followed the mitigation hierarchy to avoid and reduce impacts as far as possible, integrates with the landscape, provides ecological and landscape enhancements and improves recreational facilities in the area through the creation of 12.8 km of new permissive paths, which will be open up to 365 days per calendar year throughout the proposed 60-year operational lifetime of the Scheme. These measures are set out within the **Outline LEMP [REP6-037]**, **Outline Ecological and Mitigation Protection**

	promote social interaction, and which are robust, durable and easy to look after; b. Climate: contribute to climate change mitigation and adaptation and the transition to net zero by using building layouts, building orientation, massing, landscaping and materials which conserve energy and other resources, and which minimise risks from the impacts of climate change including overheating; c. Nature: incorporate and/or connect to a network of high quality, accessible, multi functional green infrastructure to provide opportunities for recreation and healthy living, strengthen habitats, improve climate change resilience and improve air and water quality. This should include maintaining and enhancing tree cover and incorporating sustainable drainage systems in accordance with policies N3 and F8; d. Movement: provide transport infrastructure and choices which support the design vision for the site, provide good connections to the wider settlement (or those nearby), and prioritise walking, wheeling, cycling and public transport; e. Built Form: use the pattern of buildings to define the arrangement of streets, squares and other spaces, promote compact forms of development to optimise the site's potential, distinguish between public and private areas, create focal points and, where	**Strategy [REP6-039]**, **Outline CEMP [REP6-029]** and the **Outline Public Rights of Way and Permissive Paths Management Plan [REP1-104]**. These measures will be secured by Requirements in Schedule 2 of the **Draft DCO Draft DCO [REP6-005].** The iterative design process as described in the **Design Approach Document [APP-268]** has minimised landscape and visual effects including having regard to the special qualities of the Cotswold National Landscape (CNL) and to 'further the purpose' of the CNL. This has included: • The removal of panels within the setting of the CNL in Lime Down A, B and C.; • Incorporation of embedded mitigation into the Scheme design with respect to offsets and buffers; • Inclusion of embedded landscape design parameters as set out **ES Volume 1, Chapter 8: Landscape and Visual Impact [REP3-025]**; • Enhancement measures to 'further the purpose' of the CNL; and • Specific management regimes with respect to Lime Down A, B and C including wildflower meadow verges and maintaining hedgerows at their current height of approximately 1.5m (or as existing if greater) bordering the CNL within Lime Down C. In addition, a Change Application was submitted to the ExA on 25 June 2026 and included the removal of Solar PV Infrastructure from Field C9 in Lime Down as a result of ongoing engagement with the CNL Board. The removal of the Solar PV Infrastructure in this location results in a reduction in significant effects for Alderton Road. As set out

	appropriate, enhance views into and out of the scheme; f. Public Space: include spaces that are safe, secure, inclusive, and accessible for all ages and abilities, including for groups such as women and girls; and which facilitate and encourage social interaction, play and healthy lifestyles (for example by providing high quality, clear and legible pedestrian and cycle routes, a variety of recreational spaces and places to meet, integrating lighting and making building entrances and windows face onto streets and other public spaces to provide natural surveillance); and g. Identity: create visually attractive, distinctive and characterful development to establish or maintain a strong sense of place and pride, including through the use of a coherent palette of materials, design features and planting. 3. Development proposals should be refused if, without clear justification, they conflict with paragraph 1 of this policy or relevant aspects of the principles in paragraph 2, or with any explicit design standards set out in the development plan (including those in locally specific policies, guides, codes or masterplans). Substantial weight should be given to compliance with relevant development plan policies when assessing the design quality of proposals. 4. The principles set out in the Design and Placemaking planning practice guidance should be used to inform how this policy is applied in the	in the **Change Application and Consultation Report (Change Application) [CR1-045]** the removal of Solar PV Infrastructure has also resulted in an increase in ecological mitigation, BNG, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. **ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswold National Landscape and its Special Qualities [REP5-069]** concludes that there are no significant direct effects on the CNL or its Special Qualities. It is considered that these measures are sufficient, appropriate and proportionate to the scale of the Scheme. Requirement 7 of the **Draft DCO [REP6-005]** requires the submission and approval of a landscape and ecological management plan to be substantially in accordance with the **Outline LEMP [REP6-037]** and for the landscape and ecological management plan to be implemented as approved. These measures and controls will ensure that the detailed design of the Scheme incorporates the landscape mitigation and enhancements included within the **Outline LEMP [REP6-037]**. The measures embedded into Scheme and additional mitigation measures to minimise the impact of the Scheme on landscape and visual amenity, including local landscape character and history are set out in Section 8.9 and 8.11 of **ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [REP3-025]** and Section 12.9 and 12.11 of **ES Volume 1, Chapter 12: Cultural Heritage [REP3-017]**. These measures are also in the **Outline LEMP [REP6-037]**,

	absence of locally-produced design policies, guides, codes or masterplans. 5. Substantial weight should also be given to outstanding or innovative designs which promote high levels of sustainability, or which help raise the standard of design more generally in an area, so long as they are consistent with the overall form and layout of their surroundings.	**Outline CEMP [REP6-029]**, **Outline OEMP [REP6-031]**, and **Outline Decommissioning Strategy [REP6-033]**. Section 3.5 of the **Design Approach Document [APP-268]** sets out how the local landscape context and historic context were considered from an early stage to inform the adoption of design principles that result in a Scheme sympathetic to the landscape and historic context of the area. Design principle 1 sets out how the Scheme is 'landscape led' and gives due weight to the intrinsic character and beauty of the surrounding countryside, while design principle 7 sets out that the design of the Scheme will be sensitive to above and below ground heritage assets and their setting, by locating infrastructure at a suitable distance and through appropriate landscape screening. **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** sets out how landscape and visual and cultural heritage were taken into account during the site selection assessment. **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** sets out how the Scheme design has evolved in relation to landscape and heritage concerns. This includes the removal of fields from the solar PV sites to be sympathetic to the surrounding landscape and due to the presence of possible heritage assets. Table 4-1 of **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** summarises the main infrastructure layout iterations for the Scheme. Further details of the design evolution for the Scheme, together with a discussion on alternative sites, design

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		layouts and technologies, is set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**. The **Design Principles and Parameters [REP4-043]** sets out the design principles and parameters by which the Scheme has been designed, and the Environmental Impact Assessment has been undertaken. The design principles have informed the parameters which are secured by Requirement 5 in the **Draft DCO [REP6-005]** and apply to the detailed design of the Scheme post consent. a. The effects on residential properties and local communities are assessed in **ES Volume 1, Chapter 8: Landscape and Visual [REP3-025]**, **Chapter 13: Transport and Access [REP4-014]**, **Chapter 14: Noise and Vibration [REP5-024]**, **Chapter 15: Air Quality [REP2-008]**, **Chapter 16: Socioeconomics, Tourism and Recreation [APP-068]**, and **Chapter 18: Human Health [APP-070]**. These chapters identify both beneficial and adverse effects as a result of the Scheme, proposing measures to mitigate any adverse effects. Mitigation measures are also contained within various outline management plans which are secured via Schedule 2 of the **Draft DCO [REP6-005]**. The **Planning Statement [REP3-081]** considers the adverse and beneficial effects of the Scheme in the application of the

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		planning balance and concludes that the benefits of the Scheme outweigh the residual adverse impacts identified. The benefits of the Scheme are set out in Section 5.3 of the **Planning Statement [REP3-081]** and include the delivery of large amounts of affordable, secure, and low carbon electricity which will help the UK to achieve net zero by 2050, ecological and landscape enhancements, biodiversity net gain, permissive paths, employment generation, economic benefits and skills training. Furthermore, to help mitigate concerns ahead of and during the construction phase, the Applicant will establish a Community Liaison Group (secured by Requirement 4 of Schedule 2 to the **Draft DCO [REP6-005]**) to provide a forum for communication should development consent be granted. b. The **Statement of Need [REP1-085]** sets out that the Scheme, if consented will deliver large amounts of affordable, secure, and low carbon electricity which will help the UK achieve its Sixth Carbon Budget commitments and stay on track to achieve net zero by 2050. The need to mitigate and adapt to climate change has been considered throughout the design of the Scheme. **ES Volume 1, Chapter 7: Climate Change [REP5-022]** has

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		considered the direct and indirect impacts of climate change in terms of water shortages, storms, heatwaves and wildfires. The Scheme has been designed, as far as practicable, to avoid and reduce impacts and effects on Climate Change and to increase Climate Change resilience through the process embedding measures into the design. In addition, how the Scheme is constructed, operated and maintained, and decommissioned would be controlled through measures secured in the DCO in order to manage and minimise potential environmental effects (required as a result of legislative requirements and/or standard sectoral practices). Table 7-34 and 7-35 of **ES Volume 1, Chapter 7: Climate Change [REP5-022]** sets out that following embedded mitigation measures and those set out in the **Outline CEMP [REP6-029]**, no significant impacts will occur from these direct impacts during the construction, operation and decommissioning of the Scheme. **ES Volume 1, Chapter 7: Climate Change [REP5-022]** has taken account of the projected impacts of climate change and sets out mitigation measures embedded into the design of the Scheme during construction, operation and decommissioning. This includes (but is not limited to): • Locating associated electrical infrastructure, including substations and conversion units sequentially to areas with a 'low' probability of flooding where practicable.

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		• Less-flood sensitive infrastructure forming the wider Scheme (Solar PV Panels and cabling) will be sequentially located outside the 1 in 100 plus climate change annual probability extent (1% +CC) or where this is not practicable restricted to areas which would experience less than 1m depth of flooding during the same event. • For both fixed and tracker panels, all sensitive and electrical equipment on the Solar PV Panel will be elevated by the legs (including the solar panel face itself) so that it is no less than 0.6 metres above the surrounding peak flood level; and • Tracker panel units will be mounted on raised frames (raised a minimum of 0.4 metres when on maximum rotation angle) and will therefore be raised above surrounding ground levels and fitted with a tracking system. During times of flooding, solar panels may be stowed by the tracking system algorithm onto a horizontal plane, to the minimum post height of 2.5 metres above ground level. This ensures that all sensitive and electrical equipment on the solar panel is raised to a minimum of 2.5 metres above ground level in the horizontal position. • BESS will include heating, ventilation and cooling systems to control the temperature and allow efficient operation during warmer conditions. The Scheme by its nature helps mitigate against the effects of climate change, providing renewable energy.

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		Sustainable measures will be developed prior to the decommissioning phase for the use of lower-carbon and more climate change resilient methods. These are outlined in the **Outline Decommissioning Strategy [REP6-033]**. This will be secured by Requirement 20 in Schedule 2 of the **Draft DCO [REP6-005]**. Furthermore, **ES Volume 1, Chapter 3: The Scheme [APP-055]** outlines how the Scheme design will retain a degree of flexibility to enable it to adapt over time, be functional and fit for purpose, and respond to innovative and new technologies as well as building resilience to climate change. The Scheme (as a renewable energy scheme) maximises the opportunity to incorporate measures to become more efficient and includes BSS which allows electricity generated from the Solar PV Panels or excess energy from the grid to be stored in the batteries and exported at strategic times of the day to provide flexibility and enhance grid reliability. c. The potential impacts of the Scheme on arboriculture are assessed in **ES Volume 1, Chapter 10: Arboriculture [APP-062]**, which considers baseline arboricultural conditions and evaluates likely effects during construction, operation and decommissioning. This assessment identifies where tree removal or pruning may be required and concludes that, with embedded mitigation in place, no

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		significant adverse residual effects on arboricultural features are anticipated. Embedded mitigation measures include sensitive siting of infrastructure, minimum offsets from retained trees, protection of root protection areas, supervision by an Arboricultural Clerk of Works, and the use of trenchless construction techniques where required to avoid impacts on high value trees. Where any unavoidable tree losses are necessary, compensatory tree and woodland planting is proposed as part of the Scheme's landscape and ecological mitigation. The Scheme will deliver, as a minimum, 10% BNG, which is secured via Requirement 9 in Schedule 2 to the **Draft DCO [REP6-005]**. The **BNG Assessment Report** submitted at Deadline 7 indicates that BNG in excess of 10% will be achieved, with a total net gain of 65.35% for area habitat units, 19.39% for hedgerow units and 25.30% for watercourse units in relation to the Solar PV Sites. The total net gain for the whole Scheme (i.e. Solar PV Sites and Cable Route Corridor combined) is 37.64% for area habitat units, 12.77% for hedgerow units and 19.89% for watercourse units. The **Outline LEMP [REP6-037]** sets out the landscaping and ecological mitigation and enhancement measures for the Scheme. The overarching aim of the **Outline LEMP [REP6-037]** is to set out prescriptions for habitat creation

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		and management in order to provide ecological enhancements, strengthen the green infrastructure within the local area, and to provide landscape and visual mitigation through screening of the Scheme, where necessary. Measures include planting of hedgerows and trees, woodland copses and shelterbelts, native shrub planting as well as the creation of ground nesting bird mitigation habitat and habitat boxes and wildlife enhancement features such as log piles and hibernacula. Accordingly, these measures will contribute to improvements in natural capital and ecosystem services. Furthermore, in preparing measures to support climate change adaptation, consideration has been given to incorporating nature-based solutions into the Scheme. Proposals for Sustainable Drainage Systems (SuDS) have been included as part of the Scheme design, as set out in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012]**. d. The impacts of traffic and transport from the Scheme in **ES Volume 1, Chapter 13: Transport and Access [REP4-014]**, including the suitability of access roads, and an **Outline CTMP [REP6-041]** has been prepared and is secured under Requirement 15 in Schedule 2 of the **Draft DCO [REP6-005]**. The **Outline CTMP [REP6-041]** provides a framework for the management of construction vehicle movements to and from the Scheme, to ensure that the

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		effects of the temporary construction phase on the local highway network are minimised. The **Outline CTMP [REP6-041]** sets out construction access arrangements, construction vehicle routing, construction vehicle trip generation, and the management/mitigation measures. It also summarises the requirements for vehicles to transport AIL (for elements such as transformers). **ES Volume 1, Chapter 7: Climate Change [REP5-022]** sets out measures to minimise the need of construction staff to travel by private vehicle including encouraging the use of lower carbon modes of transport, communicating local bus connections and pedestrian and cycle access routes to/from the Scheme to all construction staff, providing appropriate facilities for the safe storage of cycles and implementing a shuttlebus to reduce the number of trips made by construction staff. Appendix C of the **Outline CTMP [REP6-041]** includes a Construction Worker Travel Plan to manage construction workers trips to the site. This includes measures to encourage travel to the site via sustainable travel where possible including measures for the provision of shuttle buses to transport construction workers to and from the Order Limits. This is particularly important for non-local workers, who are expected to stay in local accommodation and be transported to the Site. It will also be utilised by other workers as appropriate. It is expected that the shuttle bus will be able to accommodate 20 workers on average (shuttle

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		buses are likely to be of varying size). In addition, workers who drive will be encouraged to car share where practicable. The Outline CTMP is secured through Requirement 15 of Schedule 2 of the **Draft DCO [REP6-005]**. Similar measures will be developed prior to the decommissioning phase for the use of lower-carbon and more climate change resilient methods and will be outlined in the **Outline Decommissioning Strategy [REP6-033]**. Details about the measures is limited as the decommissioning environment beyond 2089 is likely to be considerably different to today. e. Criterion e is not directly relevant to the Scheme as the Scheme does not comprise development of built-up form relating to streets, squares or other public and private spaces. The Scheme comprises a Solar PV electricity generating station and associated development, rather than buildings which would establish a conventional urban form. However, as set out in the **Design Approach Document [APP-268]** and Section 2 of the **Planning Statement [REP3-081]**, the Scheme has undergone an iterative design process which has resulted in the delivery of a functional and efficient Scheme design which will deliver large amounts of renewable and low carbon energy while being sensitive to local context and surroundings.

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		f. Criterion f is also not directly relevant to the Scheme as the Scheme does not include conventional public spaces and recreational areas. However, the Scheme will include the provision of approximately 12.8 km of new permissive paths across each of the Solar PV Sites as shown on the **Works Plan [REP6-004]** as Work No.10. These routes will provide pedestrians and horse riders with improved accessibility to the countryside and improved connectivity to the wider PROW network. The permissive paths will remain open up to 365 days per year throughout the proposed 60-year operational lifetime of the Scheme and be beneficial for local users and visitors through mitigating adverse impacts on other PRoW. The permissive paths will provide alternative access routes and when implemented, will enhance connectivity in the local area. g. The Applicant wishes to retain flexibility in the design of the Scheme at the time of submission so that the detailed design of the Scheme can be informed by technical considerations, post-consent work, and take advantage of any innovations in technology before construction. This is of particular importance due to the rapid pace of change in solar PV and battery storage technology, whilst maintaining a robust and comprehensive assessment of likely significant effects of the Scheme.

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		The extent of flexibility required by the Scheme is described in **ES Volume 1, Chapter 3: The Scheme [APP-055]** and **ES Volume 1, Chapter 6: EIA Methodology [APP-058]**. To maintain flexibility in the design and layout at this stage in the process and ensure a robust assessment of the likely significant effects of the Scheme is undertaken and considered by the Secretary of State, the Scheme has adopted the 'Rochdale Envelope' approach in accordance with the Planning Inspectorate's Advice Note 9. Paragraph 4.3.18 of National Policy Statement EN-1 (Ref 6 13) states "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". Therefore, as is relevant for each technical discipline, the maximum (and where relevant, minimum) parameters for the elements where flexibility needs to be retained have been assessed under the Rochdale Envelope approach. The approach also recognises that the worst-case parameter for one technical assessment may differ from another, ensuring that worst case overall impacts are predicted. Each technical chapter describes the parameters applied in relation to the relevant assessment. The parameters for construction of the Scheme are set out in **Design Principles and Parameters [REP4-043]** which are secured under Requirement 5 (detailed design approval) of Schedule 2 in the **Draft DCO [REP6-005]**.

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DP4: The design process	1. Design quality should be considered throughout the evolution, assessment and delivery of development proposals, including through any pre-application engagement; as outlined in Part 2 of the Design and Placemaking planning practice guidance. 2. The local planning authority should: a. Ensure that they have access to, and encourage the appropriate use of design review and other design tools and processes (especially for strategic sites and other significant projects), and take into account their outcomes, including any design recommendations made by design review panels; b. Ensure that relevant planning conditions refer to clear and accurate plans and drawings which provide visual clarity about the design of the development, including the approved use of materials where appropriate; and c. Not allow the quality of approved development to be materially diminished between permission and completion, as a result of changes proposed following its initial approval (for example through changes to approved details).	The **Design Principles and Parameters [REP4-043]** set out the design principles and parameters by which the Scheme has been designed, and the Environmental Impact Assessment has been undertaken. The design principles have informed the parameters which are secured by Requirement 5 in the **Draft DCO [REP6-005]** and apply to the detailed design of the Scheme post consent. The **Design Approach Document [APP-268]** and Section 2 of the **Planning Statement [REP3-081)**, sets out that the Scheme has undergone an iterative design process which has resulted in the delivery of a functional and efficient Scheme design which will deliver large amounts of renewable and low carbon energy while being sensitive to the local context and surroundings. The **Design Approach Document [APP-268]** details that the design evolution of the Scheme has been informed by feedback received during Non-statutory and Statutory Consultation, technical feedback and through further surveys, desk-based analysis and environmental assessment. Chapter 4 of the **Consultation Report [APP-022]** details the early engagement undertaken with local authorities and key stakeholders, and the non-statutory consultation that took place from 14 March to 26 April 2024. This included (but was not limited to) engagement on the Scheme location and site selection considerations, the community benefits, BNG considerations and next steps in the development process. The Applicant also sought

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		information and feedback on the Stage One consultation, to help refine their approach ahead of the Stage Two statutory consultation and development of the Statement of Community Consultation (SoCC). This demonstrates the Scheme has considered how to ensure early, proactive and effective engagement with the community.
Chapter 15. Promoting sustainable transport		
Policy TR3: Locating development in sustainable locations	1. So that development is located where it can support sustainable patterns of movement, enable good accessibility for different users and make the most of existing and proposed transport infrastructure, development proposals should reflect the following principles, taking into account the vision for the site, the type of development and its location: a. Development proposals which could generate a significant amount of movement, in the context of the area within which they would be situated, should be in locations that are sustainable (or which can be made so, taking into account planned improvements, including any provided for as part of the development itself). This means the location should limit the need to travel, particularly by private car, and offer a genuine choice of transport modes for residents and users, unless the nature of the development would make this impractical;	The potential effects of construction traffic on the local highway network are assessed in **ES Volume 1, Chapter 13: Transport and Access [REP4-014]**, which considers construction vehicle movements, traffic volumes, road safety and effects on road users. This included consideration of the capacity of local roads and infrastructure to accommodate construction vehicles with consideration of construction traffic volumes, vehicle types, route suitability, and network performance. Supporting technical evidence is presented in **ES Volume 3, Appendix 13-1: Transport Assessment [REP6-014].** Section 13.12 of **ES Volume 1, Chapter 13: Transport and Access [REP4-014]** concludes that following the implementation of embedded mitigation, there are no residual significant effects anticipated in relation to transport and access during the operational phase, and residual effects are short-term and temporary during both the construction and decommissioning phases.

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	b. Opportunities should be taken to utilise existing or proposed transport infrastructure in optimising the amount or density of development which can be accommodated in different locations, especially where this can support more walking, wheeling, cycling and public transport use; c. Any significant adverse impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, should be mitigated to an acceptable degree using a vision-led approach; d. The environmental impacts of traffic and transport infrastructure should be identified, assessed and taken into account – including taking opportunities to avoid or mitigate any adverse environmental effects, and to secure net environmental gains such as reductions in air pollution; and e. In rural areas, opportunities to improve walking, wheeling, cycling and public transport and enhance the connectivity of an area should be taken where they exist and can be supported by the development proposed. 2. The Connectivity Tool should be used alongside other relevant quantitative or qualitative evidence in	The **Outline CTMP [REP6-041]** provides a framework for the management of construction vehicle movements to and from the Scheme, to ensure that the effects of the temporary construction phase on the local highway network are minimised. The **Outline CTMP [REP6-041]** sets out construction access arrangements, construction vehicle routing, construction vehicle trip generation, and the management/mitigation measures. This will be secured through Requirement 15 under Schedule 2 of the **Draft DCO [REP6-005]**. **<u>Pedestrians, Cyclists and Public Transport</u>** A total of 12.8km of new non-vehicular permissive paths will be provided on each of the Solar PV Sites. These are shown on the **Works Plan [REP6-004]** as demarcated by Work No.10. These routes will provide pedestrians and horse riders improved accessibility to the countryside and improved connectivity to the wider PROW network. These permissive paths are to remain open up to 365 days per year throughout the proposed 60-year operational lifetime of the Scheme. Pedestrian access to properties will be maintained at all times. In terms of cycling infrastructure there is no cycling specific infrastructure within the Solar PV Sites. There are two cycling routes which cross the Study Area for the Cable Route Corridor, the National Cycle Network Route 403 and

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	assessing the connectivity of particular locations proposed for development.	Section 14 of the Wiltshire Cycleway. It is not anticipated these will experience any significant effects. There will be no impact on local bus services, with pedestrian infrastructure maintained to provide access to local bus stops as set out in Section 13.7 of **ES Volume 1, Chapter 13: Transport and Access [REP4-014].** **<u>Service and Emergency Vehicles</u>** Deliveries to Site by HGV will be coordinated through a booking system as set out in Section 6.7 of the **Outline CTMP [REP6-041]** to avoid travel during the network peak hours where possible. Therefore, deliveries will be scheduled for between 09:30 and 16:30 where possible. Some deliveries may be required outside of these hours, if unavoidable. The vehicle movements anticipated during the construction phase are set out in **ES Volume 3, Appendix 13-1: Transport Assessment [REP6-014]**. The **Outline CTMP [REP6-041]** states that a new emergency access will be provided to Lime Down D Solar PV Site during construction and operation, providing access to the 400 kV Substation and BESS from Hill Hayes Lane. On some sections of the Cable Route Corridor trenching will be required to cross roads. This will be managed through Traffic Management and diversions where available. Steel
Policy TR4: Street design, access and parking	1. To contribute to creating well-designed places, transport considerations should be integral to the design of development, proposals for which should: a. Give priority first to walking, wheeling and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating easy access to high quality public transport, with layouts and densities which maximise the catchments for bus or other public transport services; b. Incorporate or contribute towards appropriate features to support this prioritisation, such as permeable street networks, continuous footways and segregated cycle facilities which are adequately lit, sufficient secure and accessible cycle parking, regularly spaced public seating and good quality waiting facilities for public transport; c. Ensure that the arrangement of streets and other routes help to create places that are safe, inclusive and attractive for all users (particularly for women and girls, for other groups who may be vulnerable to crime or	

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	the fear of crime, and for those with limited mobility). This includes reflecting relevant aspects of policy DP3(2), as well as employing measures to: i. Minimise the scope for conflict between pedestrians, cyclists and vehicles; ii. Meet the needs of disabled people, older people and children in relation to all modes of transport, and iii. Avoid unnecessary street clutter. d. Allow for the efficient delivery of goods, and ease of access by service and emergency vehicles, in ways which do not compromise key place-making principles (set out in policy DP3(2)); and e. Provide a suitable number of parking spaces for a range of transport modes where appropriate, reflecting the location and nature of the development (including its connectivity), any locally-set standards in the development plan, and including adequate provision of spaces and infrastructure that allow for the charging of electric vehicles in safe, accessible and convenient locations. A flexible approach to applying parking standards should be taken where the reconfiguration of retail or other sites which	plates will be made available on site for emergencies or emergency vehicles. The **Outline CTMP [REP6-041]** sets out construction access arrangements, construction vehicle routing, construction vehicle trip generation, and the management/mitigation measures. It also summarises the requirements for vehicles to transport abnormal indivisible loads (AIL) (for elements such as transformers). It also provides a framework for the management of construction vehicle movements to and from the Scheme, to ensure that the effects of the temporary construction phase on the local highway network are minimised. The Scheme proposes 'Highway Improvement Areas' adopted into the design where the construction routes pass through sections of road that are considered narrow and require widening, which will ensure that sufficient passing room is present along the routes or traffic management is implemented to ensure the safe movement of construction vehicles. The Highway Improvement Areas will be located on the construction routes and further details of these are set out in Section 13.10 of **ES Volume 1, Chapter 13: Transport and Access [REP4-014]**, **ES Volume 3, Appendix 13-1: Transport Assessment [REP6-014]**, and Section 4.6 and 5 of the **Outline CTMP [REP6-041]**. A detailed version of the **Outline CTMP [REP6-041]** will be secured via Requirement 15 under Schedule 2 of the **Draft DCO [REP6-005]**.

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	attract large numbers of customers would make better use of previously developed land, and there is evidence that a certain number of spaces needs to be retained to meet specific operational and commercial requirements. 2. The principles set out in national design guidance should be used to inform how this policy is applied.	All construction routes can accommodate construction vehicle movements with Highway Improvement Areas in place. In terms of loading/unloading facilities, temporary construction compounds would be established within the Solar PV Sites (refer to **ES Volume 2, Figure 3-2: Key Construction Phase Features [REP3-036]**). Temporary compounds would also be located along the Cable Route Corridor (refer to **ES Volume 2, Figure 3-2: Key Construction Phase Features [REP3-036]**), along with laydown areas. Contractors and visitors will be advised that parking facilities will be provided on-site in advance of visiting the Order Limits and that they should not park on-street. It is anticipated that goods would be delivered by HGV to the construction compounds within the Solar PV Sites and then distributed to the point of need within the Order Limits using lighter vehicles (e.g. tractor and trailer) as required. Whilst each construction compound will be removed at the end of the construction phase, space will remain within each Solar PV Site on the access tracks for such a vehicle to turn around to ensure that reversing will not occur onto the highway. **ES Volume 1, Chapter 13: Transport and Access [REP4-014]** provides more detail on the embedded mitigation measures for the construction, operation and maintenance and decommissioning stage of the Scheme. These details
Policy TRA6: Assessing transport impacts	1. Development proposals that are likely to generate significant amounts of movement should be supported by: a. A transport statement or transport assessment (depending on the extent and significance of the transport issues involved), which is proportionate to the nature and scale of the development, so that the likely impacts of the proposal for transport can be assessed and monitored; and b. A travel plan, which indicates how sustainable transport objectives will be delivered, monitored and managed over time. 2. Transport assessments and statements, and travel plans, should reflect the transport vision for the development and the transport strategy for the area in which it is located, and how these are intended to be achieved (including, in the case of travel plans,	

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	identifying fallback options if initial measures do not deliver the expected outcomes). 3. In assessing movement patterns and potential impacts, including whether they are considered to be severe, reasonable future scenarios should be considered, taking into account impacts at relevant times of the day, potential cumulative impacts, multimodal trip generation and the promotion of sustainable modes of travel, and realising the transport vision for the development itself. Development proposals should be considered having regard to these potential impacts and the other policies in this Framework which are relevant (including TR3, TR4 and DP3(2)(d)). 4. Development proposals should be refused if they would have a severe adverse impact on the transport network (in terms of capacity and congestion, including cumulative impacts), or an unacceptable impact on highway safety; taking into account any mitigation measures proposed as well as any wider network improvements, including measures to support sustainable patterns of movement. This applies both during the construction phase and following completion.	are further set out in the **Outline CTMP [REP6-041]**, **Outline CEMP [REP6-029]**, **Outline OEMP [REP6-031]** and **Outline Decommissioning Strategy [REP6-033]** which will be secured through Requirements in the **Draft DCO [REP6-005]**. **Parking** During the construction phase, a compound area will be set up on-site for contractors, including appropriate parking spaces as set out in Section 13.9 of **ES Volume 1, Chapter 13: Transport and Access [REP4-014].** Advisory signs will be in place to inform contractors and visitors that parking will not be permitted on-street in the vicinity of the Order Limits or on access roads. Furthermore, contractors and visitors will be advised that parking facilities will be provided on-site in advance of visiting the Order Limits. **Travel Plan** An **Outline Construction Worker Travel Plan (CWTP)** has been prepared as part of the **Outline CTMP [REP6-041]** and is secured through a Requirement in the **Draft DCO [REP6-005]**. This includes measures to encourage travel to the site via sustainable travel where possible including measures for the provision of shuttle buses to transport construction workers to and from the Order Limits. This is particularly important for non-local workers, who are expected to stay in

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		local accommodation and be transported to the Site. It will also be utilised by other workers as appropriate. It is expected that the shuttle bus will be able to accommodate 20 workers on average (shuttle buses are likely to be of varying size). In addition, workers who drive will be encouraged to car share where practicable. The **Outline CTMP [REP6-041]** seeks to ensure the safe movement of construction workers and the local community. **Cumulative Effects** An assessment of cumulative effects on transport and access is set out in Section 13.13 of **ES Volume 1, Chapter 13: Transport and Access [REP4-014]**. The Applicant has consulted with the relevant local highways authorities in relation to the cumulative effects assessment. It states that the number of traffic flows on the links associated with the construction phase of the Scheme are low, and it is therefore unlikely that the cumulative effects will greatly affect the severity of effects from the Scheme. This is particularly the case given that the impacts of the construction phase are temporary in nature and that measures set out in the **Outline CTMP [REP6-041]** will ensure that construction traffic avoids the AM and PM highway peaks. **ES Volume 1, Chapter 13: Transport and Access [REP4-014]** notes that for the Solar PV Sites, it is not likely that all cumulative BESS Area and Solar schemes will be constructed simultaneously, and at the same time as the

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		Scheme. Furthermore, for the Cable Route Corridor, in the unlikely case that there are vehicle movements on the more local roads within the Study Area, the addition of the low vehicle movements associated with each cable route corridor access, over a 90-day period, will not result in a significant cumulative effect at these locations. **ES Volume 1, Chapter 13: Transport and Access [REP4-014]** concludes that the cumulative effects of the Scheme on transport and access are not considered to be significant.
Policy TR8: Public rights of way	1. Development proposals should: a. Protect and enhance the network of public rights of way, including through suitable diversions agreed with the highway authority; and b. Take opportunities to extend, link or improve the quality of existing routes where this enables one or more of the following: i. Improved access to green spaces and the countryside; ii. New direct and circular routes and connections between local and long-	The Scheme will retain public rights of ways (PRoW) and it is anticipated that PRoW which cross the Order Limits will generally remain open during the construction, operation and maintenance and decommissioning phases of the Scheme and will be managed in accordance with the measures in the **Outline Public Rights of Way and Permissive Paths Management Plan [REP1-104]** to ensure user safety, for example at construction vehicle crossings. However, the following temporary closures/diversions are also envisaged (see the **Public Rights of Way Plan [REP5-008]** for the locations of the closures/diversions): • PRoW MALW54 will be temporarily diverted for the duration of the construction phase for health and safety reasons and to avoid conflict with construction vehicles accessing Lime Down E, at Access 18. The diversion will run adjacent to the existing alignment. Once construction is complete, the PRoW will return to its existing alignment;

	distance footpaths, bridleways and cycle routes; iii. The provision of accessible, safe and convenient links to services and facilities; and iv. Improved connections with public transport stops and interchanges.	• PRoW GRIT20 (located in the Cable Route Corridor) will be temporarily diverted for the duration of the construction phase for health and safety reasons and to avoid conflict with construction vehicle access at Access 102. The diversion will run adjacent to the construction compound to the north and east. Once construction is complete, the PRoW will return to its existing alignment. • Temporary closures may also be required during construction for installation of Grid Connection Cables, but this will likely last not more than one day (or overnight). Where temporary closures are deemed to be necessary, these will be prioritised for overnight work (when there are unlikely to be PRoW users), and sufficient notice will be given to users and the local highway authority so far as practicable. The **Design Approach Document [APP-268]** sets out how the design of the Scheme has evolved within a framework provided by design principles, including a design principle seeking to minimise the effects of the development on PRoW by incorporating measures to maintain, and where practicable, explore opportunities to improve the local footpath network. The Scheme includes the creation of 12.8 km of new non-vehicular permissive paths on each of the Solar PV Sites for the lifetime of the Scheme to provide pedestrians and riders improved accessibility to the countryside and improved connectivity of the wider PRoW network. The location of the proposed permissive paths is outlined on the **Works Plan [REP6-004]** as Work No.10B**.** The design

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		and implementation of the proposed permissive paths is set out in the **Outline Public Rights of Way and Permissive Paths Management Plan [REP1-104]** and their creation and maintenance are secured through a Requirement in Schedule 2 to the **Draft DCO [REP6-005]**.
Chapter 16. Promoting healthy communities		
Policy H7: Development affecting existing recreational land and facilities	1. Development proposals should not result in the loss of existing open space, sports and recreational buildings and land, including playing fields, other formal and informal play space and allotments, 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 location which offers comparable or improved accessibility for the community it serves; or c. The development is for public service infrastructure, and the resulting loss would be replaced by equivalent or better provision in terms of quantity and/or quality; or d. The development is for alternative open space, sports and recreational buildings and land, the benefits of which clearly outweigh the loss of the current or former use.	As set out in the **Planning Statement [REP3-081]**, the Scheme includes the creation 12.8 km of new permissive paths, which will be open up to 365 days per calendar year throughout the proposed 60-year operational lifetime of the Scheme to provide pedestrians and horse and bicycle riders improved accessibility to the countryside and improved connectivity of the wider PRoW network. The permissive paths will provide a beneficial impact on PROW use for local users and visitors through mitigating adverse impacts on other PROWs and providing alternative access routes to the use of the local highway network. The design and implementation of the proposed permissive paths is set out in the **Outline Public Rights of Way and Permissive Paths Management Plan [REP1-104]** and are secured under Requirement 16 in Schedule 2 of the **Draft DCO [REP6-005]**. When implemented, these measures will enhance connectivity in the local area for recreation purposes, secondarily benefitting local population health and wellbeing in the long-term. Due to the nature of the Scheme it will not directly contribute to the provision or extension and maintenance of accessible green space. However, the Scheme, being located largely

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		on existing agricultural land, is not anticipated to directly impact on the use and accessibility of dedicated recreational spaces such as parks, open spaces and playing fields.
Chapter 17. Pollution, public protection and security		
Policy P2: Ground conditions	1. Sites proposed for development should be suitable for their proposed use taking into account: a. Ground conditions, including any risks arising from land instability or contamination (whether due to natural hazards or current and former activities such as mining or fuel storage); and b. The extent to which any such risks can be mitigated, and the potential impacts on the natural environment arising from remediation. 2. Where land is remediated it should, as a minimum, not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990. 3. Adequate site assessment information, prepared by a competent person, should be available to inform these considerations. 4. Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.	Ground conditions and contamination are assessed in **ES Volume 1, Chapter 19: Ground Conditions [REP5-026]**. Preliminary Risk Assessments (PRA) have been undertaken for each of the Solar PV Sites and the Cable Route Corridor to assess the current land condition within the Order Limits and identify any potential contaminants. The PRAs are set out in **ES Volume 3, Appendices 19-1 to 19-8 [REP3-069]** to **[REP3-080]** and the key findings are set out in **ES Volume 1, Chapter 19: Ground Conditions [REP5-026]**. There is not expected to be any likely significant effects associated with ground conditions with implementation of the embedded mitigation. Best practice and bespoke mitigation measures will be carried out during construction, operation and decommissioning to reduce nuisance impacts from dust generation, soil removal and waste generation and avoid impact on ground conditions. This includes (but is not limited to): • Construction and management of roadways and access to the construction sites to minimise issues like dust, sedimentation of waterways, degradation of soil quality, loss of topsoil and surface run off. • Management of excavated and imported soils and aggregates to be used in all aspects of the construction to avoid fugitive emissions of dust and run off to water courses.

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		• Management of any wastes generated by the construction process to make sure of no adverse impacts on receptors. **ES Volume 1, Chapter 19: Ground Conditions [REP5-026]** concludes that, with implementation of the embedded and additional mitigation measures as set out in Sections 19.10 and 19.12 of the chapter, there are no likely residual significant effects are anticipated. The proposed mitigation includes the measures set out in the **Outline CEMP [REP6-029]**, **Outline SWMP [REP1-102]** and **Outline SRMP [EN010168/APP/7.15]** to manage the hazards associated with contaminants during the construction phase of the development, and similarly measures in the **Outline OEMP [REP6-031]** and **Outline Decommissioning Strategy [REP6-033]** for the operation and maintenance and decommissioning phases. The measures outline in the outline management plans will be secured by a Requirement in Schedule 2 of the **Draft DCO [REP6-005].**
Policy P3: Living conditions and pollution	1. Development proposals should be appropriate for their location, taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, whether these effects are on or off-site; and whether this is as a result of the development itself or the product of preexisting conditions in its vicinity. In assessing the potential effects of pollution, consideration should be given to the potential sensitivity of the site, and its intended occupiers and	**Human Health** **ES Volume 1, Chapter 18: Human Health [APP-070]** provides an assessment of the likely significant effects on human health as a result of the Scheme including an assessment on the social environment (housing, open space leisure and play, transport modes access and connections, community identity culture resilience and influence); economic environment (education and training, employment and income); bio-physical environment (air quality, water

	users, as well as that of the environment and population in the surrounding area (including where certain groups could be particularly vulnerable to its effects, such as children and older people). 2. Within this context development proposals should: a. Provide healthy living conditions for occupiers and users in terms of adequate access to light and avoiding exposure to levels of air, noise, artificial light or other sources of pollution which could have an unacceptable adverse effect on health and the quality of life. Where necessary suitable mitigation measures should be incorporated to secure acceptable living conditions; b. Not give rise to, or contribute to, an unacceptable level of access to daylight and sunlight for neighbouring residents and occupiers, or unacceptable levels of air, noise, artificial light, water, soil or other forms of pollution on or beyond the site. Adverse impacts of this nature should be avoided where possible, or else mitigated to an acceptable degree. Where possible, opportunities should be taken to reduce pollution affecting the wider area (such as through traffic and travel management or improved external lighting); c. Sustain and contribute to compliance with relevant limit values or national objectives and targets for air pollutants including PM2.5. Development proposals should take account of Air Quality Management Areas and be consistent with the objectives of	quality or availability, land quality, noise and vibration); and institutional built environment (health and social care services). Amenity is considered in the transport and noise and vibration assessments in **ES Volume 1, Chapter 13 Transport and Access [REP4-014]** and **ES Volume 1, Chapter 14 Noise and Vibration [REP5-024]**. **ES Volume 1, Chapter 18: Human Health [APP-070]** concludes that no residual significant effects from the Scheme on human health are anticipated at any stage of the Scheme following the implementation of embedded and additional mitigation. Mitigation measures are set out in the **Outline LEMP [REP6-037]**, **Outline CEMP [REP6-029]**, **Outline OEMP [REP6-031]**, **Outline Decommissioning Strategy [REP6-033]**, **Outline CTMP [REP6-041]**, and **Outline Public Rights of Ways and Permissive Paths Management Plan [REP1-104]**. These measures will be secured by Requirements in Schedule 2 of the **Draft DCO [REP6-005]**. These measures include ecological and landscaping enhancements, green infrastructure, traffic management measures, creation of 12.8 km of new permissive paths and adoption of Best Practice Measures. Health impacts from Scheme components such as emissions from the BESS have been assessed and mitigated through measures included in the **Outline BSMP [REP3-106]**. **Lighting**

	relevant Air Quality Action Plans, Clean Air Plans and Local Air Quality Strategies; d. Mitigate and reduce to a minimum potential adverse impacts resulting from noise, not result in levels of noise exposure which would have a significant observed adverse effect, and maintain the character of tranquil areas (those areas that have remained relatively undisturbed by noise from human sources and are prized for their recreational and amenity value for this reason); e. Limit any adverse impact from artificial light on local amenity, intrinsically dark landscapes (those areas entirely, or largely, uninterrupted by artificial light) and nature; and f. Assess and mitigate impacts where the development could have an unacceptable adverse effect on water quality, especially in relation to sensitive water bodies such as chalk streams. 3. In applying this policy, it should be assumed, unless there is clear evidence to the contrary, that separate regulatory regimes for the control of pollution will operate effectively, as set out in policy DM7. This means that it will be appropriate to take into account emissions limits set through those other regimes.	**ES Volume 1, Chapter 3: The Scheme [APP-055]** sets out the lighting strategy for the Scheme in Section 3.4 and Section 3.5. For construction works and at construction compounds temporary site lighting will be used in hours of darkness or where natural lighting is unable to reach (such as sheltered/ confined areas). Where avoiding is not possible, to minimise impacts on human and ecological receptors: • The use of lighting will be minimised to that required for safe site operations; • Lighting will utilise directional fittings to minimise outward light spill and glare (e.g. via the use of light hoods/cowls which direct light below the horizontal plane, preferably at an angle greater than 20° from horizontal); and • Lighting will be directed towards the middle of the Order limits rather than towards the boundaries. During the operation and maintenance phases, lighting is not required within the Solar PV Sites and all routine maintenance activities would be scheduled for daylight hours as far as practicable. Focussed task specific lighting would only be required in the event of emergency works or equipment failure requiring night-time working. Motion sensing security lighting would be provided within substations and within the BESS Area to maintain safe working conditions in winter months, for security purposes, and for maintenance activities. The **Outline OEMP [REP6-031]** states that a sensitive lighting strategy, as part of the detailed OEMP will specify

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		how the artificial lighting will be installed and used, and also serve to mitigate adverse impacts on sensitive receptors. The assessment of the finding of the likely effects on Glint and Glare is presented in Section 20.5 of **ES Volume 1, Chapter 20: Other Environmental Matters [APP-072].** For CNL viewpoint receptors and PRoW, a low impact is predicted towards five of the 15 viewpoint receptors, where partial screening has been identified in the form of intervening terrain and existing vegetation. These impacts are considered to be not significant. No impacts are predicted towards the remaining viewpoints. A low impact is predicted towards users of PRoW in the vicinity of the Scheme, however there are no significant safety implications and any negative impact upon amenity will be fleeting for users travelling on PRoW, including equestrian and cyclist users. Therefore, impacts are considered to be not significant, and accordingly no mitigation measures are proposed. Section 3.4 of **ES Volume 3, Appendix 8-6: Assessment of the Effects on the Cotswolds National Landscape and its Special Qualities [APP 197]** considers the Cotswolds AONB Landscape Strategy and Guidelines in relation to dark skies. It concludes that the Scheme's lighting design is dark-sky-compliant and would ensure that the dark skies within the CNL remain intact. **Noise**

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		ES Volume 1, Chapter 14: Noise and Vibration [REP5-024] provides as assessment of the likely significant impacts of the Scheme on noise and vibration. It concludes no significant residual effects are anticipated on any noise sensitive receptors following mitigation set out in the **Outline CEMP [REP6-029]**, **Outline OEMP [REP6-031]**, and **Outline Decommissioning Strategy [REP6-033]**. Mitigation measures have been identified that respect the tranquillity of the area, which was identified in Section 14.7 of **ES Volume 1, Chapter 14: Noise and Vibration [REP5-024]** to represent a typical quiet rural location. The Scheme has been designed as far as practicable to avoid and reduce impacts and effects on noise with Section 14.9 of the chapter setting out embedded mitigations measures, which represent Best Practical Measures. These are secured within the **Outline CEMP [REP6-029]** for the construction phase and the **Outline Decommissioning Strategy [REP6-033]** for the decommissioning phase, and the development of detailed plans is to be secured by requirements 13 and 20 under Schedule 2 of the **Draft DCO [REP6-005].** Additional measures, set out in Section 14.11 of the chapter, in the form of a bespoke communication strategy to inform occupants of the timings of noisy works, will be implemented for the one receptor which may experience temporary elevated noise levels, and as set out in Table 14-24 Summary of Significant Residual Effects (Construction and Decommissioning) of **ES Volume 1, Chapter 14: Noise and Vibration [REP5-024]**, no significant residual effect remains

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		following the implementation of these measure and no residual significant effects on noise and vibration are predicted during any stage of the Scheme. Furthermore, the **Tranquillity Assessment – Effects of Construction Traffic on the Cotswolds National Landscape [REP5-099]** was submitted by the Applicant at Deadline 5 and concludes that the effects of the construction route on the CNL would not result in a significant change to the tranquillity of the CNL given the current aural and visual baseline and predicted vehicle movements. **Air** **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]** assesses the likely significant effects of the Scheme on air quality and concludes that, with embedded mitigation, no likely significant effects are identified in relation to air quality as a result of the Scheme. Mitigation measures are set out in the **Outline CEMP [REP6-029]** (including measures to control dust and vehicle emissions during construction); the **Outline CTMP [REP6-041]** (including measures to control construction traffic and worker vehicle numbers); the **Outline BSMP [REP3-106]** (including measures to deal with emissions in the event of fire); the **Outline OEMP [REP6-031]** and the **Outline Decommissioning Strategy [REP6-033]** (which both

Relevant Policy or Paragraph	Detail	Scheme Compliance
		include the same air quality mitigation proposed in the Outline CEMP). These will be secured through Requirements in Schedule 2 to the **Draft DCO [REP6-005].** **<u>Water Quality</u>** Potential effects of the Scheme on water quality and contamination risk are assessed in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012]**, which sets out mitigation and management measures to protect water quality during construction, operation and decommissioning. These measures include pollution prevention controls, containment systems, emergency response protocols, and site-specific drainage measures, particularly around the Battery Energy Storage System (BESS) and substations where lined drainage and automatically actuating valves are proposed. **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012]** concludes that, with embedded mitigation and additional mitigation measures and the measures described in the **Outline CEMP [REP6-029]** and **Outline Decommissioning Strategy [REP6-033]**, no significant residual effects are anticipated during the construction, operation and maintenance and decommissioning phases of the Scheme. These measures are secured through requirements 13 and 20 under Schedule 2 of the **Draft DCO [REP6-005]**.

Relevant Policy or Paragraph	Detail	Scheme Compliance
		Soils **ES Volume 1, Chapter 17: Soils and Agriculture [REP3-021]** assesses the direct and indirect impacts on soil resources. It also sets out the measures to manage any potential impacts to the soil (and agricultural land) during the construction, operational (including maintenance) and decommissioning phases, and an **Outline SRMP [REP6-035]** has been prepared which is secured by Requirement 17 of the **Draft DCO [REP6-005]**. **ES Volume 1, Chapter 17: Soils and Agriculture [REP3-021]** sets out that by leaving the land undisturbed under long-term grassland, soil health, quality and structure within the Solar PV Sites are likely to improve during the lifetime of the Scheme. **ES Volume 1, Chapter 17: Soils and Agriculture [REP3-021]** sets out industry standard good practice measures for the handling and management of soil resources based upon guidance such as Defra's Code of Practice for the Sustainable Use of Soil on Construction Sites, and these are further described in the **Outline CEMP [REP6-029]** and **Outline SRMP [REP6035].** A detailed CEMP and SRMP prior to the commencement of works in site are secured by a Requirement in the **Draft DCO [REP6-005]**.

Relevant Policy or Paragraph	Detail	Scheme Compliance
Policy P4: Impact of development on existing activities	1. Existing businesses, community facilities, public services and defence and security activities should not have unreasonable restrictions placed on their current or permitted operation as a result of development being approved after they were established. This means that development proposals should be capable of being integrated effectively with existing business, community and public service activities and infrastructure in their vicinity (including, but not limited to, uses such as pubs, music venues, places of worship, sports clubs, blue light services, defence, electricity network infrastructure and industrial and waste sites). 2. Where the operation of an existing activity could have a significant adverse effect on a proposed new development in its vicinity, development proposals should: a. Identify the nature of the potential impacts, informed where necessary by early discussions between the applicant (i.e. the 'agent of change') and those existing uses which could be affected by the proposal to inform the scope for mitigation; and b. Be able to demonstrate that suitable mitigation can be provided before first occupation of the development, if it is to be acceptable. Planning conditions or	**ES Chapter 16: Socio-Economic, Tourism and Recreation [APP-068]** considers the socio-economic impact of the Scheme, including on local business, community facilities and tourism receptors. It identifies and assesses the following socio-economic impacts: • Key tourist and visitor attractions of local, regional and national importance likely to be impacted by the Scheme; • Locally and regionally important parks and nature reserves; • PRoW and long-distance walking and cycling routes; • Navigable waterways and waterbodies used for recreation; • Recreation aviation centres; • Recreational hubs for organised sports and youth sports and play likely to be impacted by the Scheme; and • Equestrian businesses and facilities likely to be impacted by the Scheme. **ES Volume 1, Chapter 16: Socio-Economic, Recreation and Tourism [APP-068]** concludes that there are limited significant adverse effects on facilities, with no adverse effects present during operation. During construction and decommissioning adverse effects are identified and include long distance recreational routes, PRoW and permissive routes, equestrian facilities, and park farm. These are classed as medium term and temporary for both construction and decommissioning. However, adverse impacts have been

	obligations should be used to secure agreed mitigation measures. 3. This policy applies to new development involving changes of use of land and property, as well as to new construction, and includes situations where new development may interfere with the operation of electronic communications networks. Both lawful current and permitted levels of operation of existing activities should be taken into account when applying this policy.	minimised as far as possible through mitigation including removal of array areas and offsets from PRoW, embedded and additional landscape screening planting and ecological enhancements, and traffic management to control operational movements and HGV routing and numbers. **ES Volume 1, Chapter 16: Socio-Economic, Recreation and Tourism [APP-068]** recognises that there are likely to be positive impacts upon levels of economic activity, the local labour market, and increased economic prosperity and income for workers within 20km of the Scheme, including through indirect and induced impacts from increased supply chain activity and increased spending. The **Outline Skills, Supply Chain and Employment Plan [REP3-104]** sets out the proposals to promote apprenticeship and training schemes to enhance local skills and qualification rates and help retrain people in work displaced by the Scheme, and decrease the proportion of workers required to be brought in from further afield. This is intended to enhance local education, skills and attainment during construction and for periods of onsite infrastructure replacement during operation of the Scheme. The **Outline Skills, Supply Chain and Employment Plan [REP3-104]** also provides measures to secure opportunities for re skilling of employees into new industries, including the energy sector, and include supporting the local agricultural industry in diversified agricultural practices. This will be secured through Requirement 18 under Schedule 2 of the **Draft DCO [REP6-005]**. The **Equine Business Report [REP5-105]** assesses the equine industry and supply chain in more detail, and

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		identifies all relevant mitigation measures to equine businesses and equestrian users of the surrounding PRoW and highway network. The assessment concludes no significant effects to equine business anticipated at any phase of the Scheme. In addition, the **Technical Note on the Impacts to Non-Equine Businesses [REP5-111]** provides an assessment of businesses or commercial enterprises within a 5 km Study Area of the Scheme. It concludes that the Scheme has been identified as most likely to beneficially affect businesses in the civil engineering sector, and parts of the supply chain to that industry, with more limited benefits to serviced accommodation and wider spending impacts. Adverse effects are anticipated to be likely to occur in the agriculture sector, food and drinks sector, local accommodation sector (where dependent on recreational stays more than business stays), and other visitor-dependent industries. This reflects the industries assessed in **ES Volume 1, Chapter 16: Socio-Economic, Recreation and Tourism [APP-068]**. Following consideration of the existing and additional mitigation measures secured during the examination process, the Applicant confirmed in the **Technical Note on the Impacts to Non-Equine Businesses [REP5-111]** that the assessment outcomes of **ES Volume 1, Chapter 16: Socio-Economic, Recreation and Tourism [APP-068]** stand, and confirms there are no significant effects to any business sector within the 5 km Study Area surrounding the Scheme. Any individual business likely to be specifically affected by the Scheme either have been engaged with

Relevant Policy or Paragraph	Detail	Scheme Compliance
		throughout the examination process, or are committed to be engaged with through the Community Liaison Group and Stakeholder Communications Plan to ensure construction impacts to their business' operations can be minister through coordinated and targeted mitigation efforts.
Policy P5: Maintaining public safety and security	1. Development proposals should anticipate and address possible malicious threats and other hazards (whether natural or man-made) in relation to: a. Their occupiers and users, by identifying potential safety risks and proportionate mitigation opportunities which can be addressed through the design of the scheme. This applies especially where particular groups may be vulnerable to crime, or to the fear of crime – such as women and girls – or would be at risk from physical hazards (such as children where open water or transport infrastructure is present or planned); b. Locations where large numbers of people are expected to congregate, such as transport hubs, night-time economy venues, cinemas and theatres, sports stadiums and arenas, shopping centres, health and education establishments, places of worship, hotels and restaurants, visitor attractions and commercial centres. Proposals for major development in such locations should be informed by the most up-to-date information	The effects of the Scheme on human health are considered within the technical chapters of the **ES** and **ES Volume 1 Chapter 18: Human Health [APP-070]**. Following the implementation of mitigation measures set out in the technical chapters, that will be secured through the **Outline CEMP [REP6-029]**, **Outline OEMP [REP6-031]**, and the **Outline Decommissioning Strategy [REP6-033]**, no significant impacts are anticipated on human health. These outline plans will be secured in detail by Requirements in Schedule 2 of the **Draft DCO [REP6-005].** Security measures for the Scheme are outlined in **ES Volume 1, Chapter 3: The Scheme [APP-055].** These include the deployment of CCTV and fencing around the perimeter of the operational areas of the Solar PV Sites, as well as perimeter fencing to ensure the site is secure. The Scheme does not involve a location where large numbers of people are expected to congregate nor does it involve development for a new major hazard site.

	available from the police and other relevant agencies about the nature of potential threats and their implications, and appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; c. Uses which could pose a potential hazard to the surrounding area. Development proposals involving new major hazard sites, changes to existing major hazard sites, major accident hazard pipelines and Health and Safety Executive licensed explosive sites (as identified within Health and Safety Executive and Office for Nuclear Regulation consultation zones) should proceed only if it can be demonstrated that the development would not increase the risk or the adverse consequences of a major accident; and d. Consultation zones around major accident hazard sites, major accident hazard pipelines and Health and Safety Executive licensed explosives sites, safeguarded areas around civilian aerodromes or technical sites and Outline Planning Zones or Detailed Emergency Planning Zones around nuclear sites. Development proposals within these areas should only be supported where, having consulted the relevant consultation bodies, it is clear that the development will be safe for occupiers and users and will not impose constraints on the operation of the	

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	facility or facilities to which the safeguarded area or consultation zone relates.	
Chapter 18. Managing flood risk and coastal change		
Policy F4: Assessing flood risk for decision-making	1. To inform the assessment of flood risk and, where relevant, appropriate mitigation, a site specific flood risk assessment should accompany all development proposals in Flood Zones 2, 3a, and 3b as defined in Annex F, table 1. 2. In Flood Zone 1, a site-specific flood risk assessment should inform and accompany all development proposals involving: a. Sites of one hectare or more; b. Land which has been identified by the Environment Agency as having critical drainage problems; and c. Land identified in a strategic flood risk assessment or the Flood Map for Planning as being at risk of flooding from any source, whether now or in the future. 3. Site-specific flood risk assessments should be appropriate to the scale, nature, and location of development and should, where relevant, support an assessment of whether a development proposal satisfies the sequential and exception tests set out in policies F5 and F6.	**ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012]** has been informed by the FRA and Outline Drainage Strategy and assesses the likely impacts and effects of the Scheme in relation to hydrology, flood risk and drainage for the whole lifecycle of the development. It concludes that, with the embedded mitigation and additional mitigation outlined in Chapter 11, and the measures described in the **Outline CEMP [REP6-029]** and **Outline Decommissioning Strategy [REP6-033]**, no significant residual effects are anticipated. A site-specific flood risk assessment is included in **ES Volume 3, Appendix 11-1 to Appendix 11-9 [REP4-021], [REP5-047]** to **[REP5-060]** and **[REP3-064]** and considers flood risk throughout each stage of development, potential sources of flooding, and assesses the risk of flooding to the Scheme. It concludes that flood risk from all sources to the Scheme is negligible to low and embedded mitigation has been incorporated into the Scheme design to increase its flood resilience. The Sequential Test has been applied and satisfied as part of site selection. This is described in **Annex C: Sequential and Exception Test** to the **Planning Statement [REP3-081]** which demonstrates that priority has been given to
Policy F5: Sequential test	1. The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Where the test applies,	

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	development proposals should not be located in areas at risk of flooding where alternative sites, appropriate for the development, are reasonably available in areas with a lower risk of flooding. The area to which the test is applied should not be greater than the anticipated catchment of the development in terms of its likely occupiers or users. 2. The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, other than for: a. Sites allocated in the development plan which were subject to the sequential test during plan preparation; b. Sites where a site-specific flood risk assessment demonstrates clearly that: i. 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); or ii. Where the site would be at risk of surface water flooding only, the proposed layout, design, and mitigation measures would ensure that occupiers and users would	areas of lower flood risk in the site selection assessment, with areas in Flood Zones 2 and 3 initially excluded from the search for alternative sites. None of the alternative sites at lower risk of flooding were assessed to be suitable for the Scheme as set out in **Annex C: Sequential and Exception Test** of the **Planning Statement [REP3-081]** and therefore further areas were explored within Flood Zones 2 and 3. The Scheme has been designed so that areas of more vulnerable infrastructure have been sited in areas of lower flood risk. In terms of the applying the sequential test at site level, tue to the presence of flood risk areas within the Solar PV Sites, the Scheme has been designed and will be constructed to be safe and operational for its lifetime, without increasing flood risk elsewhere. The FRA and Outline Drainage Strategy at **ES Volume 3, Appendices 11-1 to 11-9 [REP4-021], [REP5-047]** to **[REP5-060]** and **[REP3-064]** confirm that the Scheme is not anticipated to increase the risk of flooding elsewhere and sets out the measures that have been incorporated into the Scheme to ensure it is safe for its lifetime. Further, on the basis that the site level Sequential Test confirmed there to be no reasonably available lower risk areas for the Solar PV Sites, the Exception Test has been applied and is set out in **Annex C: Sequential and Exception Test** to the **Planning Statement [REP3-081]**. This demonstrates that the Scheme meets the Exception

Relevant Policy or Paragraph	Detail	Scheme Compliance
	remain safe from current and future surface water flood risk for the lifetime of the development without increasing flood risk elsewhere in accordance with policy F7. c. For the following types of development: i. Householder development; ii. Small non-residential extensions (with a footprint of less than 250m2); and iii. Changes of use, other than changes of use to a caravan, camping or chalet site, or to a mobile home or park home site. 3. The strategic flood risk assessment covering the area of the proposed development and the Flood Map for Planning should provide the evidential basis for applying the sequential test.	Test and sets out the wider sustainability benefits that the Scheme would deliver in the event it is consented. This is also in compliance with NPS EN-1 5.8.42 (which allows the Secretary of State to grant consent where the Exception Test is met) and aligns with Table 2 in NPPF Annex F, which defines solar infrastructure as Essential Infrastructure and permissible in Flood Zone 3 where the Exception Test can be demonstrated. As set out in Section 8.3 of the **Planning Statement [REP3-081]**, the Scheme is not anticipated to increase the risk of flooding elsewhere, because: • The design of the Solar PV Panels and mounting structures will allow flood water to flow freely underneath. Potential for erosion where water drips from the Solar PV Panels is mitigated by the grassland planting beneath the panels. Therefore, the Solar PV Panels are not expected to increase flooding elsewhere; • Smaller electrical infrastructure associated with the Solar PV Panels will be sited on concrete pads, surrounded by gravel filled filter trenches, to replace the loss of natural infiltration caused by the concrete bases themselves; • For the BESS Area at Lime Down D (which includes 132 kV and 400 kV substations and incorporates an impermeable area of 63,715 m²), a Drainage Strategy has been provided within **ES Volume 3, Appendix 11.6: Flood Risk Assessment and Outline**
Policy F6: Development in areas at risk of flooding from rivers or the sea	1. In areas falling within flood zones 2, 3a, or 3b (as defined in Annex F, table 1): a. Development proposals should be refused if the use is incompatible with the risk from river or sea flooding, as set out in Annex F, table 3; and b. In certain other circumstances set out in Annex F, table 3, in addition to satisfying the sequential test in policy F5 where applicable, development will only be appropriate where an 'exception test' is satisfied. The exception	

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	test involves demonstrating that the development would meet all the following criteria: i. Provide wider sustainability benefits to the community that outweigh the flood risk; ii. Be safe for its anticipated lifetime in accordance with policy F7; and iii. Not increase flood risk elsewhere and, where possible, reduce flood risk overall. 2. The application of the exception test should be informed by a site-specific flood risk assessment. The exception test does not need to be applied: a. To those forms of development, or in those circumstances, where the sequential test is not required, as set out in policy F5; or b. Where development is proposed on a site allocated in the development plan to which the exception test was applied at the plan-making stage, unless there has been a significant increase in the risk of flooding to the site subsequently, or the nature of the development itself has changed significantly from that which was allocated so as to introduce a more vulnerable use (having regard to Annex F, table 2).	**Drainage Strategy – Lime Down D [REP5-055]** to address the increase in hardstanding resulting from the facilities. For areas with increased hardstanding, the peak surface water discharge rate will be limited to the existing 1 in 2 year greenfield runoff rate with a 30% betterment provided. This is a significant betterment of surface water runoff rates generated during a 1 in 2 year storm event at these Sites, in line with NPS EN-1 and guidance received from Wiltshire Council Lead Local Flood Authority; • Access tracks will be designed to be permeable, allowing surface water to percolate into the ground below; • The Interconnecting Cables and Grid Connection Cables will be underground once constructed, and therefore will not increase the risk of flooding; and • Temporary increases in the risk of flooding from the Scheme during construction have been addressed by embedded and additional mitigation. Section 5 of **Annex C: Sequential and Exception Test** to the **Planning Statement [REP3-081]** demonstrates the Applicant has applied and satisfied the Exception Test which included consideration of suitable brownfield sites; overall flood risk; and sustainable drainage and concludes that as flood risk is considered negligible for the Scheme the considerable wider sustainability benefits overwhelmingly outweigh any flood risk. The wider sustainability benefits include, but are not limited to, climate change adaptation, job
Policy F7: Ensuring	1. Development proposals should not present a risk from flooding to potential occupiers, users, or	

Relevant Policy or Paragraph	Detail	Scheme Compliance
development is safe from flooding	visitors, and should not increase flood risk elsewhere. 2. Where development is proposed in a location known to be at risk from any form of flooding, now or in the future, it should be refused unless: a. Within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons which justify a different arrangement; b. The development will be safe throughout its lifetime taking account of the vulnerability of its users; c. Any residual risk can be safely managed, and safe access and escape routes are included where appropriate, as part of an agreed emergency plan; d. 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; and e. It can be demonstrated that flood risk will not be increased elsewhere.	creation, accessibility, and landscape enhancements and habitat creation. The Flood Risk Assessments at **ES Volume 3, Appendices 11-1 to 11-9 [REP4-021], [REP5-047]** to **[REP5-060]** and **[REP3-064]** confirm that only limited areas of panel fields intersect with Flood Zones 2 and 3, principally at Gauze Brook (Lime Down D) and Gabriel's Well (Lime Down E2). In these locations, modelled fluvial flood depths are shallow (generally in the range of 0.2–0.4 m at Lime Down D and up to 0.5 m at Lime Down E2 in the 1% AEP + climate change event). All essential infrastructure (substations and BESS) is located wholly in Flood Zone 1 and is set above the 1 in 100 year + climate change flood level with freeboard. Within the panel areas that may be inundated, the design embeds resilience through the following measures: • Panels are raised on pile-driven frames with a clearance above the predicted flood depths, so floodwaters pass beneath without affecting electrical components. • Conversion units/inverters are either located in flood zone 1 or, where unavoidable, placed on plinths at least 0.6 m above the 0.1% AEP level, as secured in the design parameters. • Drainage design (lined systems with shut-off valves for substations/BESS, permeable access tracks, attenuation sized to the 1 in 100 + CC event plus
Policy F8: Sustainable drainage systems and watercourses	1. Development proposals which could affect drainage on or around the development site should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, in ways which are proportionate to the nature and scale of	

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	the proposal. The systems employed should provide multifunctional benefits where possible, facilitating improvements in water quality, biodiversity and amenity. 2. Sustainable Drainage Systems should: a. Be designed in accordance with the National Standards for Sustainable Drainage Systems; b. Have maintenance arrangements in place to ensure an acceptable standard of operation for the anticipated lifetime of the development; and c. In the case of proposals for major development, take account of advice from the Lead Local Flood Authority. 3. Development proposals should not enclose existing watercourses where this is not already the case, unless there are compelling reasons to do so; and should where possible remove existing culverts and renaturalise existing river channels, unless to do so would increase flood risk, result in other environmental harm or cause harm to heritage assets.	firewater) and soil management controls are secured through the **Outline CEMP [REP6-029]** and **Outline Soil Resources Management Plan [REP6-035]**, ensuring no deterioration in site recovery. On this basis, the development is both flood-resistant and resilient, and can be brought back into use quickly following a flood without significant refurbishment, which is consistent with the NPPF. SuDS have been incorporated into the Scheme to manage surface water flows and an overview of the proposed SuDS features and their maintenance is provided in the Flood Risk Assessment and Outline Drainage Strategy at **ES Volume 3, Appendices 11-1 to 11-9 [REP4-021], [REP5-047]** to **[REP5-060]** and **[REP3-064]**. For the BESS Area at Lime Down D (which includes 132 kV and 400 kV substations), an Outline Drainage Strategy is included within **Appendix 11-6: Flood Risk Assessment and Outline Drainage Strategy – Lime Down D [REP5-055]** to address the increase in hardstanding. For areas with increased hardstanding, the peak surface water discharge rate will be limited to the existing 1 in 2 year greenfield runoff rate with a 30% betterment provided. This is a significant betterment of surface water runoff rates generated during a 1 in 2 year storm event, in line with NPS EN-1 and guidance received from the Lead Local Flood Authority. For construction, temporary measures to manage surface water

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		runoff and potential soil compaction (which could lead to surface water flooding) are included in the **Outline CEMP [REP6-029]** and the **Outline Soil Resources Management Plan [REP6-035]**. The Scheme includes safe access and escape routes where required, as part of an agreed emergency plan, and that any residual risk can be safely managed over the lifetime of the development. This is provided in the **Outline CEMP [REP6-029]** which requires that an emergency response plan will be developed in consultation with the relevant local authority emergency planning officer, emergency services including the local fire service, as well as the Environment Agency in relation to responding to flood warnings and events. Flood risk was a key consideration of the design and siting of the Scheme from the outset. The **Design Approach Document [APP-268]** adopts a design principle to protect the water environment by adhering to good pollution control practice and be resilient from flooding both now and in the future and not increase the risk of flooding elsewhere. **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** considered the flood risks across potential development areas from the outset during the site selection process. Consideration of surface water drainage is set out in **ES Volume 3, Appendix 11-1 to 11-9 [REP4-021], [REP5-047]** to **[REP5-060]** and **[REP3-064]**. Mitigation measures embedded into the design of the Scheme to ensure there are no adverse impacts on surface water and drainage are

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		outlined in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012]** and include: • Eight metre buffers from infrastructure will be established around watercourses, including Main Rivers and Ordinary Watercourses. This is an improvement over the baseline scenario, where arable farming typically involves ploughing closer to ditches than the proposed separations, resulting in better drainage outcomes; • Linear infiltration trenches will be incorporated around isolated infrastructure (e.g. string inverters or cable jointing pillars) within panelled areas to manage surface water at source, mimic the undeveloped state, and prevent lateral surface water migration; • Where practicable, runoff from equipment and access tracks will be directed to permeable SuDS features such as gravel-filled trenches or French drains, or similar passive drainage features appropriate to local conditions; • Access to the Scheme during construction, operation and maintenance, and decommissioning phases will be taken from new permeable or existing farm tracks accessed from the local highway network. This limits the potential for increased surface water runoff rates and sedimentation effects during construction / decommissioning. • Where practicable, existing access tracks would be retained to limit the requirement to develop new access which can disturb soils and lead to compaction. Where new access tracks are required,

Relevant Policy or Paragraph	Detail	Scheme Compliance
		they would be designed to avoid crossing drainage ditches, where practicable. Appropriate soil handling and storage protocols are set out in the **Outline Soil Management Plan [REP6-035]**. **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012]** sets out that the Applicant has engaged with the LLFA on a number of aspects related to the water environment, including on drainage issues as set out in Table 11-2: Summary of engagement undertaken. This includes (but is not limited to) engagement on a number of drainage issues including temporary drainage, overland flow and drainage consent, temporary drainage strategy. The Applicants response to this engagement is also detailed in Table 11-2 of **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012]**.
Chapter 19. Conserving and enhancing the natural environment		
Policy N2: Improving the natural environment	1. To contribute positively to the natural environment, and support nature's recovery, development proposals should: a. Consider the environmental qualities of land proposed for development, including habitats, landscape character and the natural beauty of the countryside, and identify opportunities for those qualities to be conserved or enhanced (including through	**Landscape** **ES Volume 1, Chapter 8: Landscape and Visual [REP3-025]** provides an assessment of the likely significant effects of the Scheme on landscape character and visual amenity. Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [REP3-025]** provides detail on how the design of the Scheme has considered landscape and visual impacts and sets out the embedded mitigation and landscape strategy incorporated into the Scheme. As described in **ES Volume 1, Chapter 8: Landscape and Visual Amenity [REP3-025]**

	requirements for biodiversity net gain where these apply); b. Take into account the quality of agricultural land (including that classified as best and most versatile agricultural land, and its grade), and if significant development of agricultural land is necessary, use areas of poorer quality land where possible; c. Take suitable opportunities to connect to and strengthen ecological networks that extend beyond the site, drawing on the measures proposed by Local Nature Recovery Strategies, National Forest Strategies and Community Forest Plans, where present, and other relevant assessments; d. Conserve and enhance existing natural features of visual, historic or nature conservation value (such as established trees and hedgerows) where possible; and use appropriate landscaping to help create a well-designed place and integrate the development into its surroundings; e. Use green infrastructure provided as part of the scheme and nature-based solutions to secure multiple benefits: such as for biodiversity; surface water and pollution management (including maintaining flow rates and water quality); climate change mitigation and adaptation, and recreation; f. Minimise any adverse impacts on biodiversity and include features which support priority or threatened species such as swifts, bats and hedgehogs.	an extensive range of mitigation and enhancement measures are proposed as part of the Scheme which reduce the landscape and visual effects of the Scheme as far as practicable. With mitigation in place, **ES Volume 1, Chapter 8: Landscape and Visual [REP3-025]** concludes that in relation to visual effects, significant visual effects would be experienced by 9 private receptors during construction and at Year 1 Operation. These significant effects would fall away in Operation Year 15 and at decommissioning once landscaping has become established. For public receptors during each phase of the Scheme, **ES Volume 1, Chapter 8: Landscape and Visual [REP3-0251]** concludes that during construction and at Operation Year 1, 27 public receptors would experience significant visual effects. As planting matures, at Operation – Year 15 and at decommissioning, significant effects would be reduced to 10 affected public receptors. For transport receptors, **ES Volume 1, Chapter 8: Landscape and Visual [REP3-025]** confirms that during construction significant visual effects would occur to nine transport receptors, reducing to eight receptors during Year 1 of operation and no significant visual effects occurring during operation at Year 15 or during decommissioning. In terms of visual effects in the Cable Route Corridor, 6 significant effects would occur to private receptors during construction and to 7 public receptors as set out in **ES Volume 1, Chapter 8: Landscape and Visual [REP3-025]**. These receptors are located close to the Cable Route Corridor and would experience a change in views and visual amenity. No significant visual effects within the Cable Route Corridor Study Area would occur during operation (Year 1 or Year 15) or decommissioning.

	Development proposals should incorporate integrated nest boxes (commonly known as swift bricks) into their construction unless there are compelling technical reasons which prevent their use, or would make them ineffective; and g. Ensure that green infrastructure and other features to support nature are located and designed to minimise risk of future failure, and that appropriate measures are in place for any necessary long-term management. 2. If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated or, as a last resort, compensated for, then the development should be refused. 3. Development proposals may incorporate biodiversity enhancements which exceed the statutory objective for biodiversity net gain, but this should only be a requirement where it is set out in up-to-date development plan policies for specific site allocations. Decision makers should not give weight to other development plan policies which require biodiversity gains which go beyond the statutory framework, including where a policy requires gains for development proposals which are exempt.	It should be noted that where significant long-term effects on public receptors remain at Year 15, this is primarily because mitigation is not proposed as it would not be appropriate to the long-term landscape character and the legacy landscape. For example, where footpaths diagonally cross fields, new hedgerows to screen views of infrastructure would not be consistent with the regular pattern of fields which is characteristic of the existing landscape. Other instances of significant long-term visual effects on Public Receptors relate to the local topography where there are views from higher ground to infrastructure which cannot be fully alleviated by mitigation. These embedded mitigation and enhancement measures are incorporated into the Scheme as shown within **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** and **Figure 3-4: Landscape and Ecology Mitigation Plan [REP5-040]** to **[REP5-042]** and **[REP6-009],** which forms part of the **Outline LEMP [REP6-037]**. Requirement 7 of the **Draft DCO [REP6-005]** requires the submission and approval of a landscape and ecological management plan to be substantially in accordance with the **Outline LEMP [REP6-037]** and for the landscape and ecological management plan to be implemented as approved. These measures and controls will ensure that the detailed design of the Scheme incorporates the landscape mitigation and enhancements included within the **Outline LEMP [REP6-037]**. The **Design Approach Document [APP-268]** also sets out how the Applicant has considered landscape and visual measures as part of the design of the Scheme. This includes

Relevant Policy or Paragraph	Detail	Scheme Compliance
		the adoption of a design principle to ensure the design of the Scheme is 'Landscape Led' and gives due weight to the intrinsic character and beauty of the surrounding countryside. The design of the Scheme has also adhered to the mitigation hierarchy to reduce impacts and control any adverse effects on the environment and integrate the Scheme into the landscape throughout the lifecycle of the Scheme which includes (but is not limited to) the use of buffers and offsets to manage potential impacts on protected species; effective screening; and ecological enhancements including tree and hedgerow planting. Further measures are set out in the **Outline LEMP [REP6-037]** which will be secured will be secured by a Requirement in Schedule 2 of the **Draft DCO [REP6-005]**. **<u>Biodiversity</u>** **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010]** sets out that following the implementation of embedded and additional mitigation, no significant effects are identified on any statutory or non-statutory sites designated for nature conservation. The Scheme has been designed to retain the most valuable habitats and protect these through nature inclusive design such as undeveloped buffer zones during construction and operation and through the decommissioning of the Scheme.

Relevant Policy or Paragraph	Detail	Scheme Compliance
		Following additional mitigation outlined in **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010]** significant effects are anticipated on hedgerows within the Cable Route Corridor through temporary loss of habitat, and breeding birds through displacement of ground nesting birds from Solar PV Sites. However, the residual significant adverse effects are limited to site and local level and are far outweighed by the residual significant beneficial effects anticipated in relation to habitats and other species, together with the urgent need for and benefits of the Scheme. Mitigation measures are set out in the **Outline CEMP [REP6-029]**, **Outline OEMP [REP6-031] Outline Decommissioning Strategy [REP6-033]**, and the **Outline EPMS [REP6-039].** These will be secured through Requirements in Schedule 2 to the **Draft DCO [REP6-005].** **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010]** sets out that the design of the Scheme has evolved to avoid impacts and effects on ecology and biodiversity as far as practicable. The Scheme incorporates a number of enhancements resulting in a number of significant beneficial effects including (but not limited to): • Overall significant beneficial effects at local level on grassland and various species as a result of the reversion of the arable fields which currently dominate the Solar PV Sites to grassland for the lifetime of the Scheme;

Relevant Policy or Paragraph	Detail	Scheme Compliance
		• Significant long term beneficial effects at local level in relation to hedgerow and woodland habitats, as a result of the proposed hedgerow, woodland and tree planting set out in the **Outline LEMP [REP6-037]** secured through Requirement 7 in Schedule 2 to the **Draft DCO [REP6-005]**; • A significant beneficial effect at site-to-local level on the extent of standing water habitat as a result of the creation of new ponds. Details of the proposed ponds are set out in **Figure 3-4: Landscape and Ecology Mitigation Plan [REP5-040]** to **[REP5-042]** and **[REP6-009]** and measures for their creation are set out in the **Outline LEMP [REP6-037]**; and • A significant beneficial effect at site level on the quality of the local ditch and watercourse network. **Biodiversity Net Gain** The Scheme will deliver, as a minimum, 10% BNG, which is secured via Requirement 9 in Schedule 2 to the **Draft DCO [REP6-005]**. The **BNG Assessment Report [REP6-024]** indicates that BNG in excess of 10% will be achieved, with a total net gain of 65.35% for area habitat units, 19.39% for hedgerow units and 25.30% for watercourse units in relation to the Solar PV Sites. The total net gain for the whole Scheme (i.e. Solar PV Sites and Cable Route Corridor combined) is 37.64% for area habitat units, 12.77% for hedgerow units and 19.89% for watercourse units.

Relevant Policy or Paragraph	Detail	Scheme Compliance
		Agricultural Land As set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056],** the Applicant considered agricultural land in its site selection for the Scheme. **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** sets out the six stage approach adopted when assessing other suitable alternative sites for the Scheme and confirms that in the initial search for sites, agricultural land within a classification of Grade 3, Grade 2 or Grade 1 was excluded from the search in order to identify sites on non-BMV land. In addition, non-agricultural land, such as rooftops and previously developed land was considered, however none of the alternative sites (on non-agricultural land or lower quality agricultural land) were assessed to be viable for the Scheme and therefore Grade 3 agricultural land was added to the search area. The Scheme is predominantly located on agricultural land. As set out in **ES Volume 1, Chapter 17 Soils and Agriculture [REP3-021]** and **ES Volume 3, Appendix 17-1 Agricultural Land Classification and Soil Resource Survey Report [REP3-067]**, Agricultural Land Classification surveys have confirmed that the majority (67%) of the agricultural land within the Solar PV Sites comprises non-BMV Land. Of the agricultural land within the Solar PV Sites, approximately 505 hectares (around 68%) is classified as Subgrade 3b or Grade 4 and is therefore not BMV land. There is no Grade 1 land, around 30.8 hectares (approximately 4%) of Grade 2 land, and approximately 233 hectares (around 32%) of Subgrade 3a land. For the Cable

Relevant Policy or Paragraph	Detail	Scheme Compliance
		Route Corridor, 52% of the agricultural land is classed as BMV (49% Grade 3a and 3% Grade 2). There are no areas of Grade 1 land within the Cable Route Corridor. The distribution of ALC grades is shown in **ES Volume 2, Figure 17-2: Agricultural Land Classification Mapping [APP-172]**. The justification for inclusion of BMV land in the Scheme is as follows: • The parcels of Grade 2 land in Lime Down E are optimal for siting Solar PV Panels due to being south facing and their proximity to the rest of the Scheme, and their inclusion is required to offset the loss of locations for Solar PV Panels in other areas of the Scheme. • The Scheme is temporary and reversible in nature and therefore will not affect the long-term agricultural resource. Upon decommissioning, all land (including the BESS Area and substations) will be returned to its previous use and condition as far as is practicable. The decommissioning measures set out in the **Outline Decommissioning Strategy [REP6-033]** are secured by a Requirement in Schedule 2 of the **Draft DCO [REP6-005]**. • The design of the Solar PV Sites is compatible with certain farming practices, such as sheep grazing, which could continue during operation of the Scheme. Therefore, whilst the land would not be available for crop production, there may be an opportunity to limit the effects on agricultural

Relevant Policy or Paragraph	Detail	Scheme Compliance
		production during the Scheme's lifetime through other forms of agricultural practice; • Mitigation is proposed as set out in the **Outline Soil Resources Management Plan [REP6-035]** to reduce the effects on soils as a result of the Scheme. Whilst the construction of the Scheme is anticipated to result in temporary moderate adverse residual significant effects on soil resources (through construction site activities), there are also anticipated temporary moderate benefits to soil health at decommissioning as a result of removing the land from intensive agricultural practices for the Scheme's lifetime. Further details are provided in **ES Volume 1, Chapter 17 Soils and Agriculture [REP3-021]**; and • The substantial benefits of the Scheme justify the inclusion of BMV land, namely the Scheme's contribution to meeting the established and urgent need for renewable energy infrastructure such as solar, which has been identified as a critical national priority in NPS EN-1 Part 4.2 Furthermore, the **Outline LEMP [REP6-037]** details how grassland and other habitat will be established beneath and between the solar panels. The detailed LEMP will be secured through Schedule 2, Requirement 7 of the **Draft DCO [REP6-005]**. Through the establishment and maintenance of long-term grassland beneath and between the solar arrays, soil health, quality and structure are anticipated to improve over the lifetime of the Scheme, resulting in a temporary, moderate beneficial effect on soil

Relevant Policy or Paragraph	Detail	Scheme Compliance
		resources at decommissioning, which is assessed as significant (Sections 17.10 and 17.12 of **ES Volume 1, Chapter 17 Soils and Agriculture [REP3-021]**). **<u>Strengthening Ecological Networks</u>** The **Outline LEMP [REP6-037]** aims to set out prescriptions for habitat creation and management in order to provide ecological enhancements, strengthen the green infrastructure within the local area, and to provide landscape and visual mitigation through screening of the Scheme, where necessary. It considers the habitats and species recorded within the Solar PV Sites, as well as those identified within the surrounding area in order to maximise biodiversity benefits of habitats on site for local wildlife. The following documents have been consulted in the preparation of the **Outline LEMP [REP6-037]**, with key policies and objectives considered: • Wiltshire Core Strategy (adopted January 2025); • Wiltshire's Natural Environment Plan 2022 2030: • A Green & Blue Infrastructure Strategy for Wiltshire; • Local Nature Recovery Strategy for Wiltshire and Swindon Public Consultation Draft March 2025; • Natural England Habitat Network Mapping; • Wiltshire Landscape Biodiversity Areas; • Buglife's 'B-Lines' Initiative; and • Bristol Avon Catchment Plan.

Relevant Policy or Paragraph	Detail	Scheme Compliance
		Requirement 7 of the **Draft DCO [REP6-005]** requires the submission and approval of a landscape and ecological management plan to be substantially in accordance with the **Outline LEMP [REP6-037]** and for the landscape and ecological management plan to be implemented as approved. These measures and controls will ensure that the detailed design of the Scheme incorporates the landscape mitigation and enhancements included within the **Outline LEMP [REP6-037]**. **Arboriculture** **ES Volume 1, Chapter 10: Arboriculture [APP-062]** reports the Applicants assessment of likely significant effects of the Scheme on trees. No direct loss of category A trees or veteran trees will occur within the Solar PV Sites, with likely removals limited to category B and C trees/tree groups. Some tree removals may be required in the Cable Route Corridor, but this will preferentially target trees of lower quality and no ancient or veteran trees will be removed from the Cable Route Corridor. Some likely canopy/root impacts are highlighted in **ES Volume 1, Chapter 10: Arboriculture [APP-062]**. However, micro-siting will be employed to avoid the removal or occurrence of root or canopy impacts to veteran trees and high-quality category A trees within the Cable Route Corridor. Temporary construction compounds will be sited outside of the canopy spreads and RPAs of adjacent trees

Relevant Policy or Paragraph	Detail	Scheme Compliance
		and woodlands. Overall, neutral and non-significant residual impacts are anticipated for all veteran trees and ancient woodlands at the Solar PV Sites provided that embedded mitigation measures are followed. Mitigation is proposed to avoid and reduce impacts on existing woodland features. The Scheme layout has been carefully designed to avoid veteran trees and embedded mitigation has been included such as tree buffer zones to avoid soil disturbance, micrositing to avoid root and canopy impacts, and demarcation fencing. These measures are set out further in the **Outline CEMP [REP6-029]**. **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010]** sets out that there will be significant long term beneficial effects at local level in relation to hedgerow and woodland habitats, as a result of the proposed hedgerow, woodland and tree planting outlined in the **Outline LEMP [REP6-037]**. This will be secured via Requirement 7 under Schedule 2 of the **Draft DCO [REP6-005]**. **Green Infrastructure and Nature Based Solutions** The **Outline LEMP [REP6-037]** sets out the landscaping and ecological mitigation and enhancement measures for the Scheme. The overarching aim of the **Outline LEMP [REP6-037]** is to set out prescriptions for habitat creation and management in order to provide ecological

Relevant Policy or Paragraph	Detail	Scheme Compliance
		enhancements, strengthen the green infrastructure within the local area, and to provide landscape and visual mitigation through screening of the Scheme, where necessary. Measures include planting of hedgerows and trees, woodland copses and shelterbelts, native shrub planting as well as the creation of ground nesting bird mitigation habitat and habitat boxes and wildlife enhancement features such as log piles and hibernacula. Accordingly, these measures will contribute to improvements in natural capital and ecosystem services. Furthermore, in preparing measures to support climate change adaptation, consideration has been given to incorporating nature-based solutions into the Scheme. Proposals for Sustainable Drainage Systems (SuDS) have been included as part of the Scheme design, as set out in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012]** **Site Selection** **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** sets out designated international and national ecological and geological sites were identified and avoided for the Scheme, including the Salisbury Plain (a SAC, SPA and SSSI) in the south of the defined 20 km search area, together with a number of other SSSIs within the search area. For all sites assessed ecological sites were identified in or near to the potential development area.

Relevant Policy or Paragraph	Detail	Scheme Compliance
		Ecology and biodiversity were considered amongst a number of planning, environmental and operational criteria to assess the potential sites identified.
Policy N3: Trees in new development	1. In recognition of the benefits which trees can provide for biodiversity, climate change mitigation and adaptation, and the character and quality of the built environment, development proposals should: a. Make new streets tree-lined (unless there are strong reasons why this would be inappropriate in specific streets), and incorporate trees in other suitable locations, such as in parks and through the provision of community orchards; b. Ensure that the selection of species and their placement is compatible with highways and other infrastructure requirements and the needs of different users of public spaces; and will be effective in helping to adapt to the effects of climate change and delivering other environmental benefits. Suitable arboricultural advice should be sought, and proposals discussed with highways and trees officers where necessary, so that the right trees are planted in the right places; and c. Make provision for the long-term maintenance of both existing and newly-planted trees which form part of the development.	**ES Volume 1, Chapter 10: Arboriculture [APP-062]** reports the Applicants assessment of likely significant effects of the Scheme on trees. No direct loss of category A trees or veteran trees will occur within the Solar PV Sites, with likely removals limited to category B and C trees/tree groups. Some tree removals may be required in the Cable Route Corridor, but this will preferentially target trees of lower quality and no ancient or veteran trees will be removed from the Cable Route Corridor. Some likely canopy/root impacts are highlighted in **ES Volume 1, Chapter 10: Arboriculture [APP-062]**. However, micro-siting will be employed to avoid the removal or occurrence of root or canopy impacts to veteran trees and high-quality category A trees within the Cable Route Corridor. Temporary construction compounds will be sited outside of the canopy spreads and RPAs of adjacent trees and woodlands. Overall, neutral and non-significant residual impacts are anticipated for all veteran trees and ancient woodlands at the Solar PV Sites provided that embedded mitigation measures are followed.

Relevant Policy or Paragraph	Detail	Scheme Compliance
		Mitigation is proposed to avoid and reduce impacts on existing woodland features. The Scheme layout has been carefully designed to avoid veteran trees and embedded mitigation has been included such as tree buffer zones to avoid soil disturbance, micrositing to avoid root and canopy impacts, and demarcation fencing. These measures are set out further in the **Outline CEMP [REP6-029]**. **ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010]** sets out that significant long term beneficial effects at local level in relation to hedgerow and woodland habitats, as a result of the proposed hedgerow, woodland and tree planting outlined in the **Outline LEMP [REP6-037]**.This will be secured via Requirement 7 under Schedule 2 of the **Draft DCO [REP6-005]**.
Policy N4: Protected Landscapes	1. Development proposals within Protected Landscapes should be limited in scale and extent and sensitively located and designed to avoid harm to the statutory purposes and special qualities of the Protected Landscape. Substantial weight should be placed on the importance of conserving and enhancing the natural beauty of these areas, and to conserving and enhancing wildlife and cultural heritage in National Parks and the Broads. 2. Proposals for major development within Protected Landscapes should be refused other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. To inform a decision about whether	The **Planning Statement [REP3-082]** (from paragraph 8.3.211) sets out how the Scheme meets the test set out in NPPF Policy N4, paragraph 2. This is drafted in the context of NPS EN-1 paragraph 5.10.32, which contains the same test. The conclusion is that the Scheme meets the requirements of paragraph 5.10.32. The **Statement of Need [REP1 085]** explains why solar development is required at this scale to meet the Government's targets as set out in the Clean Power 2030 Action Plan. It is the Government's policy to support the development of large-scale schemes in order to meet the urgent need for unprecedented levels of clean electricity. NPS EN-1 recognises that meeting the country's energy

	exceptional circumstances exist, consideration of such proposals should include an assessment of: a. The need for the development, including in terms of any national considerations such as maintaining a sufficient supply of minerals, and the impact of permitting it, or refusing it, upon the local economy; b. The cost of, and scope for, developing outside the Protected Landscape, or meeting the need for the development in some other way; and c. Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which it could be moderated. 3. Where, exceptionally, proposals for major development are approved within Protected Landscapes, steps should be taken to mitigate potential adverse impacts on their special qualities and statutory purposes, including on features such as tranquillity and dark skies. 4. Development proposals within the setting of Protected Landscapes should be sensitively located and designed to avoid or minimise adverse impacts on the Protected Landscape.	needs requires the use of large scale, centralised electricity generating facilities via a high-voltage transmission system, which 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. Furthermore, the **Statement of Need [REP1-085]** explains that the Scheme will be a substantial infrastructure asset, which if consented will deliver a large amount of secure, and low carbon electricity which will help the UK achieve its Sixth Carbon Budget commitments and stay on track to achieve net zero by 2050. The majority of the Scheme is located outside of the Cotswold National Landscape (CNL). A very small section of the Scheme is located within the CNL and parts of Lime Down A, B and C are considered to be in the setting of the CNL. The works within the CNL comprise minor highway works to facilitate construction traffic. **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** sets out the alternative construction routes that were considered, and concludes that the proposed construction route through the CNL is considered to be the least constrained in terms of both meeting the needs of the Scheme and minimising environmental effects. As set out in the **Design Approach Document [APP-268]** the Applicant has sought to reduce adverse impacts on the

Relevant Policy or Paragraph	Detail	Scheme Compliance
		CNL by removing a number of fields from the Order Limits in areas near the CNL and also removing panels from fields in Lime Down A, B and C closest to the CNL. Panels were further removed from Lime Down C during the Examination as a result of ongoing engagement with the CNL Board. A Change Application was submitted to the ExA on 25 June 2026 and included the removal of Solar PV Infrastructure from Field C9. The removal of the Solar PV Infrastructure in this location results in a reduction in significant effects for Alderton Road. As set out in the **Change Application and Consultation Report (Change Application) [CR1-045]** the removal of Solar PV Infrastructure has also resulted in an increase in ecological mitigation, BNG, landscaping, offsets and agricultural land managed for environmental enhancement and habitat creation. The Applicant has adopted a “landscape led” approach to design, giving due weight to the intrinsic character and beauty of the surrounding countryside (discussed in the **Design Approach Document [APP-268]**). The proposed landscaping design is set out in **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [REP5-040]** to **[REP5-042]** and **[REP6-009]**. **ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswold National Landscape and its Special Qualities [REP5-069]** provides a standalone assessment of

Relevant Policy or Paragraph	Detail	Scheme Compliance
		the effects of the Scheme on the CNL and its Special Qualities. The landscape and visual effects of the Scheme on the CNL and its Special Qualities have been mitigated throughout the landscape led, iterative design process that has been undertaken which has been informed by the Cotswold Nature Recovery Plan and in consultation with officers at the CNL and Wiltshire Council. Embedded mitigation measures relating to the CNL include: • Avoidance measures through the use of significant buffers for areas of the Scheme within the setting of the CNL and to maintain views. • Protection of the existing landscape through buffers and offsets. • Retention and enhancement of the existing landscape framework including new planting and the re-establishment of historic hedgerows within the setting of the CNL, new areas of native woodland, trees, scrub and grassland, new planting within riparian corridors to enhance rivers and wetland, as well the restoration of dry-stone walls and creation of new ponds. • Positive enhancements to further the purpose of the CNL including, the creation of wildflower meadows, wildflower meadow verges and maintaining hedgerows at their current height to maintain open view of the landscape. Embedded mitigation and enhancement measures are incorporated into the Scheme as shown within **ES Volume 2,**

Relevant Policy or Paragraph	Detail	Scheme Compliance
		Chapter 3: Scheme Description [EN010168/APP/6.1] and **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [REP5-040]** to **[REP5-042]** and **[REP6-009]**, which forms part of the **Outline LEMP [REP6-037]**. Requirement 7 of the **Draft DCO [REP6-005]** requires the submission and approval of a landscape and ecological management plan to be substantially in accordance with the **Outline LEMP [REP6-037]** and for the landscape and ecological management plan to be implemented as approved. These measures and controls will ensure that the detailed design of the Scheme incorporates the landscape mitigation and enhancements included within the **Outline LEMP [REP6-037]**. **ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswold National Landscape and its Special Qualities [REP5-069]** concludes that there are no significant direct effects on the CNL or its Special Qualities. It is considered that these measures are sufficient, appropriate and proportionate to the scale of the Scheme. Furthermore, **Annex E: Cotswolds National Landscape Policy and Guidance Note** was appended to the **Planning Statement [REP3-081]** at Deadline 2 and provides an overview of the CNL Board's publications and demonstrates where relevant policies have been considered within the design of the Scheme. It concludes that the Scheme reflects a thorough understanding of the CNL Board's priorities to conserve and enhance the CNL. Through the application of

Relevant Policy or Paragraph	Detail	Scheme Compliance
		relevant assessments and embedded mitigation measures, the Scheme seeks to deliver a large scale solar development which avoids and reduces impacts and effects on the designation as far as practicable. In addition, the Scheme will provides extensive planting and the delivery of permissive paths within the setting of the CNL which will enhance connectivity and recreation in the area. The Scheme therefore comprises a development which meets the urgent need for low carbon renewable energy whilst also conserving the natural beauty of the CNL.
Policy N6: Areas of particular importance for biodiversity and geodiversity	1. To support the conservation of important habitats, species and sites of geodiversity value, development proposals affecting: a. A site of international importance, which for the purpose of this policy is a habitats site, should be refused unless: i. An appropriate assessment has concluded that the proposal will not adversely affect the integrity of the site (either individually or in combination with other developments), or the proposal can satisfy the derogation tests; and/or ii. The impact of development on the relevant protected features of the protected site is being addressed through an Environmental Delivery Plan which has been made and the	**<u>Habitats Regulations Assessment</u>** The **Habitat Regulations Assessment Report [REP3-090]** provides an Appropriate Assessment that sets out the mitigation measures proposed on the Bath and Bradford-on-Avon bats SAC and Seven Estuary Ramsar during construction and decommissioning, and the Seven Estuary Ramsar during operation and maintenance. The Appropriate Assessment sets out mitigation measures where relevant in relation to: • Loss or change of functionally-linked land. • Fragmentation. • Loss or damage to roosts. • Killing and injury The **Habitat Regulations Assessment Report [REP3-090]** concludes that with the adoption of mitigation measures

	developer has committed to paying the nature restoration levy. b. A site of national importance, which for the purpose of this policy is one designated as a Site of Special Scientific Interest, should only be supported if: i. There would be no adverse effect (either individually or in combination with other developments) on the site's features of special scientific interest; or ii. The benefits of the development in the location proposed clearly outweigh both the likely impact on the features of special scientific interest, and any broader impact on the national network of Sites of Special Scientific Interest; or iii. The impact of development on the relevant protected feature of the protected site is being addressed through an Environmental Delivery Plan which has been made and the developer has committed to paying the nature restoration levy. c. A site of local importance, which for the purpose of this policy is one designated as a Local Nature Reserve or identified as a local wildlife site, local geological site or equivalent in the development plan, should only be supported if:	including ecological buffers, control of lighting and implementation of an **Outline CEMP [REP6-029]** and **Outline BSMP [REP3-106]**, no adverse effects on site integrity of the Bath and Bradford-on-Avon Bats SAC, Severn Estuary SAC, Severn Estuary SPA or the Severn Estuary Ramsar site are deemed likely, either in isolation or in combination with other projects. Miitgation measures which are secured within the **Draft DCO [REP6-005]** for avoiding potential significant effects on the Bath and Bradford-on-Avon Bats SAC include: • sensitive siting of Temporary Construction Compounds outside of Core Areas/Impact Zones; • restriction on size of required new hedgerow gaps at the Solar PV Sites (including Lime Down C); and • narrowing of construction widths at field boundary habitats within the Cable Route Corridor to avoid fragmentation of habitat, control of lighting, and adequate mitigation for loss of potential bat roost sites to avoid killing/injury to individual bats and ensure no net loss of roost sites. Mitigation measures which are secured within the **Draft DCO [REP6-005]** for avoiding significant effects on the Severn Estuary Ramsar include: • adoption of trenchless techniques (e.g. HDD) for cable installation crossing watercourses likely to be used by qualifying fish species; and • burial of cables under watercourses to sufficient depths to minimise potential risks of EMFs impacts sensitive fish species.

	i. There would not be a significant adverse effect on the integrity of the site; or ii. The benefits of development in the location proposed clearly outweigh the likely impact on the features which make the site valuable for nature conservation. 2. Irrespective of a site's status in nature conservation terms, development proposals which would entail the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists. 3. This policy applies to development on land inside or outside a designated area, if it would have an impact on the identified biodiversity or geodiversity value of the area concerned.	The **Habitat Regulations Assessment Report [REP3-090]** states that with the implementation of mitigation measures secured within the **Draft DCO [REP6-005],** it is concluded that the Scheme would not result in any adverse effects on the integrity of any European site. **Sites of Ecological Importance** Section 9.10 of **ES Volume 1, Chapter 9: Ecology [REP4-010]** sets out the effects of the Scheme on internationally, nationally and locally designated sites of ecological conservation importance, protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats. Following additional mitigation outlined in **ES Volume 1, Chapter 9: Ecology [REP4-010]** significant effects are anticipated on hedgerows within the Cable Route Corridor through temporary loss of habitat, and breeding birds through displacement of ground nesting birds from Solar PV Sites. However, the residual significant adverse effects are limited to site and local level and are far outweighed by the residual significant beneficial effects anticipated in relation to habitats and other species, together with the urgent need for and other benefits of the Scheme. These enhancement measures are outlined in the **Outline LEMP [REP6-037]**, and secured through a Requirement in the **Draft DCO [REP6-005]**. **ES Volume 1, Chapter 9: Ecology [REP4-010]** sets out an assessment of the likely impacts and effects of the Scheme on national and local statutory designated sites for nature conservation, including Harries Ground SSSI, Sutton Lane

Relevant Policy or Paragraph	Detail	Scheme Compliance
		SSSI, Corston Quarry and Pond LNR, and Conygre Mead LNR. The assessment concludes, given the lack of impacts pathways between the Scheme and any SSSI and LNR following implementation of embedded mitigation measures set out in the **Outline CEMP [REP6-029]**, **Outline OEMP [REP6-031]**, and **Outline Decommissioning Strategy [REP6-037]**, no significant effects are anticipated on any SSSIs and LNRs during the construction, operation and maintenance, and decommissioning of the Scheme. These measures are secured by Requirements in Schedule 2 of the **Draft DCO [REP6-005].** **ES Volume 1, Chapter 9: Ecology [REP4-010]** sets out that the Scheme incorporates a number of ecological enhancements resulting in a number of significant beneficial effects including (but not limited to): • Overall significant beneficial effects at local level on grassland and various species as a result of the reversion of the arable fields which currently dominate the Solar PV Sites to grassland for the lifetime of the Scheme; • Significant long term beneficial effects at local level in relation to hedgerow and woodland habitats, as a result of the proposed hedgerow, woodland and tree planting outlined in the **Outline LEMP [REP6-037]**; • A significant beneficial effect at site-to-local level on the extent of standing water habitat as a result of the creation of new ponds. Details of the proposed ponds are set out in **ES Volume 2, Figure 3-4: Landscape**

Relevant Policy or Paragraph	Detail	Scheme Compliance
		and Ecology Mitigation Plan [REP5-040] to **[REP5-042]** and **[REP6-009]** and measures for their creation are set out in the **Outline LEMP [REP6-037]**; and • A significant beneficial effect at site level on the quality of the local ditch and watercourse network. **ES Volume 1, Chapter 9: Ecology [REP4-010]** includes an assessment of the likely impacts and effects of the Scheme on non-statutory sites designated for nature conservation, including Local Wildlife Sites. There is potential for chemical spills and surface runoff into watercourses during the construction phase, which may subsequently degrade the habitats present within these sites, should they be hydrologically connected to the watercourses present within and adjacent to the Scheme. However, embedded mitigation measures are incorporated into the **Outline CEMP [REP6-029]**, secured through Requirement 13 in Schedule 2 to the **Draft DCO [REP6-005]**, to manage run-off and chemical spillages during the construction phase which include storing chemicals in accordance with their Control of Substances Hazardous to Health (COSHH) guidelines, whilst spill kits will be provided in areas of fuel/oil/minor chemicals storage; an Emergency Spillage Plan will be produced, which site staff will have read and confirmed that they understand, via the site induction; and measures to limit the mobilisation of sediments and run-off, such as when working in very wet conditions or the use of silt fencing when working in ditches or watercourses. The

Relevant Policy or Paragraph	Detail	Scheme Compliance
		assessment concludes, given the lack of impacts pathways between the Scheme and any non-designated nature sites following implementation of embedded mitigation measures, no significant effects are anticipated during the construction, operation and maintenance, and decommissioning of the Scheme. Non-statutory Designated Sites may also be suspectable to habitat fragmentation impacts through the creation of new accesses in hedgerows within the Order Limits, which contribute to habitat connectivity between the sites and within the local landscape. However, **ES Volume 1, Chapter 9: Ecology [REP4-010]** sets out that the design of the Scheme has carefully considered the locations of existing road accesses and field entrances and utilised wherever possible to avoid unnecessary hedgerow removal during construction. Where it has not been possible to utilise existing access and new accesses are proposed, the smallest practical access gap permissible will be used. These are anticipated to measure no more than a typical agricultural access at 3.5-6 m, and therefore these new accesses are highly unlikely to significantly impact the connectivity of the local hedgerow network or result in habitat fragmentation impacts which significantly affect the status of the above designated sites. Given that embedded mitigation measures will aim to minimise any potential impacts, it is considered that all reasonable steps will be taken to ensure that any fragmentation impacts will be of a low magnitude and no significant adverse effects are anticipated during construction.

Relevant Policy or Paragraph	Detail	Scheme Compliance
		Arboriculture **ES Volume 3, Appendix 10-1: Arboricultural Impact Assessment and Outline Arboricultural Method Statement [APP-206]** identifies that there are no ancient woodland or ancient trees, and 52 veteran trees within the Order Limits. Six areas of ancient woodland lie adjacent to the Order Limits. Low impacts have been identified to trees on the edge of one Ancient Woodland, North Bincombe Wood. As set out in the **Outline CEMP [REP6-029],** access tracks will be aligned to maintain a minimum 15 m buffer from the boundary of North Bincombe Wood Ancient Woodland, whilst also maintaining a minimum 50 m buffer from the Great Crested Newt (GCN) pond identified between Fields E1 and E2 (as identified in **ES Volume 2, Figure 2-2: Figure 2-2-1 to 2-2-5 Field Boundaries and Numbering [APP-078])**. Any repairs to the existing access track adjacent to North Bincombe Wood shall be limited to the infilling of potholes using no-fines gravel and topsoil only. Use of the access track shall be limited to access by existing landowners for the purposes of accessing and managing their land; access required for hedgerow and other vegetation management; and access by the undertaker, its contractors or agents where reasonably necessary to undertake activities required to comply with, or discharge, its legal or statutory obligations in connection with the authorised development.

Relevant Policy or Paragraph	Detail	Scheme Compliance
		Where construction traffic uses the existing access track adjacent to Surrendell Ancient Woodland, the following measures will apply: • Protective fencing shall be installed, where appropriate, along the woodland edge to prevent vehicles leaving the existing track and entering the adjacent woodland or its buffer. Fencing shall be installed in accordance with the principles of BS 5837:2012 Trees in Relation to Design, Demolition and Construction – Recommendations. • Where the existing track is identified as having insufficient stability or load-bearing capacity for the size and weight of construction vehicles using it, suitable ground protection measures shall be installed. The type and extent of ground protection will be determined having regard to the anticipated vehicle movements and ground conditions. • Any works or activities within the ancient woodland buffer that are not otherwise addressed by the detailed CEMP or detailed Arboricultural Method Statement (AMS) will be subject to monitoring by the ACoW • The relevant Local Planning Authority will be notified of any material incident or material departure from the approved AMS associated with works adjacent to Surrendell Ancient Woodland, and of any evidence identified by the ACoW that construction activities have resulted in adverse effects on the ancient woodland

Relevant Policy or Paragraph	Detail	Scheme Compliance
		Dust and sediment controls will be in place for relevant works near ancient woodland as set out in the **Outline CEMP [REP6-029]** secured through Requirement 13 in Schedule 2 to the **Draft DCO [REP6-005]**.
Chapter 20. Conserving and enhancing the historic environment		
Policy HE4: Securing the conservation of heritage assets	1. Heritage assets, as an irreplaceable resource, should be conserved in a manner appropriate to their significance. To achieve this, development proposals which would affect the significance of heritage assets, including any contribution made by their setting should: a. Maintain or secure a use consistent with their conservation, taking into account the importance of maintaining the assets, the positive contribution they can make to sustainable communities including local economies, and the positive contribution they can make to local character and distinctiveness; and b. Avoid (or if that is not possible, minimise) harm to the significance of heritage assets, and instead conserve this significance. 2. Any harm to, or loss of, the significance of a designated heritage asset (including from development within its setting) should have a clear	**ES Volume 1, Chapter 12: Cultural Heritage [REP3-017]** provides an assessment of the likely significant effects of the Scheme on designated and non-designated assets, including consideration of their significance and setting. Archaeological field evaluation was undertaken within all areas of the Scheme that were suitable for survey and where land access was permitted to enhance baseline understanding of non-designated heritage assets. The results are detailed in **ES Volume 3, Appendix 12-4: Archaeological Geophysical Survey Reports [APP-233]** and **[APP-224]**. Evaluation trial trenching was undertaken to test the results of the geophysical survey. Interim reports detailing the results of the evaluation trial trenching are provided in **ES Volume 3, Appendix 12-5: Interim Evaluation Trial Trenching Reports [APP-225]** to **[APP-229]**.

Relevant Policy or Paragraph	Detail	Scheme Compliance
	and convincing justification in accordance with the policies in this chapter. 3. Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the asset should not be taken into account in any decision relating to the asset. 4. Proposals for enabling development, which would otherwise conflict with other policies in this Framework and/or those in the development plan, but which would secure the future conservation of a heritage asset, should be considered on the basis of whether the conservation benefits outweigh the disbenefits of departing from the policies concerned.	Section 12.12 of **ES Volume 1, Chapter 12: Cultural Heritage [REP3-017]** concludes that in the absence of additional mitigation, significant effects have been identified for 23 archaeological assets. Following implementation of additional mitigation measures, the residual effect would be reduced, and no significant effects would occur. Where archaeological mitigation in the form of a programme of excavation and recording will occur or re-instatement of earthworks, it should be noted that physical impact will still occur to archaeological assets identified. However, the archaeological mitigation works proposed are considered sufficient to preserve the asset by record, and as such compensate for their loss. Impacts of the Scheme during operation on heritage assets would predominantly be indirect (on setting). No significant impacts are anticipated as a result and impacts to setting would be temporary and reversed following the decommissioning of the Scheme. Embedded mitigation measures have been incorporated into the Scheme design to avoid and reduce impacts and effects on cultural heritage. This includes: • Design decisions to remove Solar PV Panels from various fields (or parts of them) within the Solar PV Sites as a result of heritage or archaeological sensitivities;
Policy H5: Assessing the effects on heritage assets	1. Development proposals affecting heritage assets should be accompanied by an assessment of the significance of the assets affected (including any contribution made by their setting) and of the potential effect of the proposal on their significance. The level of detail should be proportionate to the assets' importance and no more than is necessary to understand the potential effect of the proposal on their significance. The relevant historic environment record should be referred to in making this assessment, and appropriate expertise employed where necessary. 2. Assessments of the potential effects of development proposals on the significance of heritage assets	

Relevant Policy or Paragraph	Detail	Scheme Compliance
	(including through effects on their setting) should identify whether proposals would be likely to: a. Have a positive effect, which is where the significance of a heritage asset would be enhanced, or better revealed; or b. Have no effect on the significance of a heritage asset; or c. Result in harm to the significance of a heritage asset, either from work affecting the asset itself or from development within its setting. The degree of harm should be identified: substantial harm would occur where the development proposal would seriously affect a key element of the asset's significance; or d. Cause the total loss of the significance of a heritage asset. 3. In making this assessment it is the effect on a heritage asset's significance rather than the scale of the development which should be considered. 4. Decision-makers should be satisfied that assessments accurately reflect the effects on heritage assets caused by development proposals. 5. Where a development proposal involves, or has the potential to involve, a heritage asset with archaeological interest, an appropriate desk-based assessment should be undertaken and, where necessary, a field evaluation. These should be used to help understand the asset's significance and the	• The incorporation of enhanced visual screening through planting and distance offsets between the Scheme and heritage assets; and • Appropriate construction methods such as HDD in order to protect archaeological remains. Additional mitigation proposed includes an overarching Archaeological Mitigation Strategy, which details the additional mitigation during the construction phase of the Scheme (see **ES Volume 3, Appendix 12-6: Archaeological Mitigation Strategy [REP6-012]**).

Relevant Policy or Paragraph	Detail	Scheme Compliance
	potential effect of the proposal on this, which should inform the design, mitigation and implementation of the development.	
Policy HE6: Proposals affecting designated heritage assets	1. When considering the potential effect of a development proposal on the significance of a designated heritage asset, substantial weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential effect amounts to a positive effect, harm, substantial harm, or total loss of its significance. 2. Development proposals which would have a positive effect on a designated heritage asset should be supported. 3. Any harm to a designated heritage asset will be a matter of considerable importance and weight, which should be dealt with in accordance with paragraphs 4 to 6 of this policy. 4. Where a development proposal would harm the significance of a designated heritage asset the effect on the asset and its significance should be weighed against any public benefits resulting from the proposal. Important public benefits can include securing the long-term reuse of a vacant or underused listed building, and enabling energy efficiency and low carbon heating measures to be employed. 5. Where a development proposal would cause substantial harm to, or the total loss of, the	An assessment of likely significant effects on the historic environment as a result of the Scheme is provided in Section 12.10 of **ES Volume 1, Chapter 12: Cultural Heritage [REP3-017]**. **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]** concludes that the Scheme will not lead to substantial harm to any designated heritage assets. The Scheme will not lead to substantial harm to or loss of significant to any assets of the highest significance including Scheduled Monuments, Protected Wreck Sites, Registered Battlefields, grade I and II* Listed Buildings, grade I and II* Registered parks and Gardens, and World Heritage Sites. Archaeological field evaluation was undertaken within all areas of the Scheme that were suitable for survey and where land access was permitted to enhance baseline understanding of non-designated heritage assets. The results are detailed in **ES Volume 3, Appendix 12-4: Archaeological Geophysical Survey Reports [APP-223]** to **[APP-224]**. Evaluation trial trenching was undertaken to test the results of the geophysical survey. Interim reports detailing the results of the evaluation trial trenching are provided in **ES Volume 3, Appendix 12-5: Interim**

Relevant Policy or Paragraph	Detail	Scheme Compliance
	significance of a designated heritage asset, consent should be refused unless it can be demonstrated that the harm is necessary to achieve substantial public benefits that outweigh the harm or loss, or if all of the following apply: a. The nature of the heritage asset would otherwise prevent all reasonable uses of the site; b. No suitable use for the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; c. Conservation by grant-funding or some form of not for profit, charitable or public ownership is not possible; and d. The harm or loss is outweighed by the benefit of bringing the asset back into use. 6. Within this context, development which would cause substantial harm to, or the total loss of, the significance of grade II listed buildings, or grade II registered parks or gardens, should be exceptional; while development which would cause substantial harm to, or the total loss of, assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.	**Evaluation Trial Trenching Reports [APP-225]** to **[APP-229]**. **ES Volume 1, Chapter 12: Cultural Heritage [REP3-017]** concludes that there will be no residual significant effects on any designated or non-designated assets as a result of the Scheme. Embedded mitigation measures have been implemented to reduce any potential significant adverse effects. The proposed embedded mitigation includes: • Design decisions to remove Solar PV Panels from various fields (or parts of them) within the Solar PV Sites as a result of heritage or archaeological sensitivities; • The incorporation of enhanced visual screening through planting and distance offsets between the Scheme and heritage assets; and • Appropriate construction methods such as HDD in order to protect archaeological remains. Additional mitigation proposed includes an overarching Archaeological Mitigation Strategy, which details the additional mitigation during the construction phase of the Scheme (see **ES Volume 3, Appendix 12-6: Archaeological Mitigation Strategy [REP6-012]**).

Relevant Policy or Paragraph	Detail	Scheme Compliance
Policy HE7: Decisions on non-designated heritage assets	1. Development proposals which would have a positive effect on a non-designated heritage asset should be supported. 2. Where a development proposal would harm the significance of a non-designated heritage asset, this should be weighed against the benefits of the proposal and a balanced judgement made, having regard to the scale of any harm or loss and the significance of the non-designated heritage asset. 3. Where a development proposal would cause substantial harm to, or the total loss of, the significance of a non-designated heritage asset, it should only be supported where the harm or loss is outweighed by the benefits of the proposal, having regard to the scale of the harm or loss and the significance of the non-designated heritage asset.	**ES Volume 1, Chapter 12: Cultural Heritage [REP3-017]** concludes that there is no substantial harm to, or loss of, designated heritage assets as a result of the Scheme. The Heritage Statement at **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]** identifies seven designated heritage assets where there is potential for less than substantial harm (including for instance, Bradfield Manor, Surrendell Farmhouse and Fosse Lodge) which is assessed at the lower end of the scale. However, these have been further assessed in **ES Volume 3, Appendix 12-8: Cultural Heritage Impact Assessment Tables [APP-232]** and with implementation of embedded mitigation measures, no significant adverse effects have been identified. It is not anticipated that the Scheme will lead to substantial harm to the significance of any non-designated heritage assets. **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219]** identifies five non-designated heritage assets where there is potential for less than substantial harm (such as Townleaze Barn) which is assessed at the lower end of the scale. These have been further assessed in **ES Volume 3, Appendix 12-8: Cultural Heritage Impact Assessment Tables [APP-232]** and with implementation of embedded mitigation measures, no significant effects have been identified. **ES Technical Addendum to Chapter 12: Cultural Heritage [REP1A-014]** was submitted at Deadline 1A as

Relevant Policy or Paragraph	Detail	Scheme Compliance
		requested by Wiltshire Council and Historic England and included visualisations to illustrate the extent of land within views from Bradfield Manor that would include solar development, and to provide greater certainty regarding the likely visibility of the Scheme and the effectiveness of the proposed mitigation planting. The Technical Addendum supports the results of the assessment of Bradfield Manor Farmhouse carried out in **ES Volume 1, Chapter 12: Cultural Heritage [REP3-017]** and **ES Volume 3, Appendix 12-1: Heritage Statement [APP-219].**
Policy HE9: Conservation areas	1. Development proposals within or affecting the significance of conservation areas should: a. Retain and conserve buildings and other features which make a positive contribution to the character or appearance of the conservation area where possible; and b. Consider the area's special architectural or historic interest (as identified as part of the designation of the conservation area) in the design of development. 2. Not all elements of a conservation area will necessarily contribute to its significance. Where a development proposal would result in the loss of a building or other element which contributes to the character or appearance of a conservation area that is desirable to conserve, the assessment of impact should take into account the relative significance of the element affected and its contribution to the significance of the conservation area as a whole,	**ES Volume 1, Chapter 12: Cultural Heritage [REP3-017]** states there are no conservation areas within the Order limits of the Scheme. Out of 28 conservation areas in the study area, six were identified where there is a potential for impacts and were scoped in for assessment. **ES Volume 3, Appendix 12-8: Cultural Heritage Impact Assessment Tables [APP-232]** sets out that no significant adverse effects are anticipated to any conservation areas.

Relevant Policy or Paragraph	Detail	Scheme Compliance
	and the effects of this considered in accordance with policies HE5 and HE6. 3. Proposals which conserve those elements of a conservation area that make a positive contribution to the area (or which better reveal its significance) should be supported.	

Lime Down
Solar Park

Annex B : Local Policy Accordance Tables

Wiltshire Core Strategy (2015)

Wiltshire Council Saved Policies (2011)

South Gloucestershire Core Strategy (2013)

South Gloucestershire Policies, Sites and Places Plan (2017)

Draft South Gloucestershire Local Plan (2025)

Wiltshire and Swindon Minerals Core Strategy (2009)

Wiltshire and Swindon Minerals Development Control Policies Development Plan Document (2009)

Wiltshire and Swindon Waste Core Strategy (2009)

Neighbourhood Plan Accordance Tables

Wiltshire Core Strategy (January 2015)

Policy	Detail	Scheme Compliance
Core Policy 41: Sustainable Construction and Low-carbon Energy	**Climate change adaptation** New development, building conversions, refurbishments and extensions will be encouraged to incorporate design measures to reduce energy demand. Development will be well insulated and designed to take advantage of natural light and heat from the sun and use natural air movement for ventilation, whilst maximising cooling in the summer. **Sustainable construction** New homes (excluding extensions and conversions) will be required to achieve at least Level 4 (in full) of the Code for Sustainable Homes. Conversions of property to residential use will not be permitted unless BREEAM's Homes "Very Good" standards are achieved. All non-residential development will be required to achieve the relevant BREEAM "Very Good" standards, rising to the relevant BREEAM "Excellent" standards from 2019. **Existing buildings**	**Climate change adaption** As outlined in **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** the following climate change resilience measures are embedded into the Scheme: • Associated electrical infrastructure, including substations and Conversion Units sequentially located to areas with a 'Low' probability of flooding, where practicable; • Less-flood sensitive infrastructure forming the wider Scheme (Solar PV Panels and cabling) will be sequentially located outside the 1 in 100 plus climate change annual probability extent (1% +CC) or where this is not practicable restricted to areas which would experience less than 1m depth of flooding during the same event; • For both fixed and tracker panels, all sensitive and electrical equipment on the Solar PV Panel will be elevated by the legs (including the solar panel face itself) so that it is no less than 0.6 metres above the above the 0.1% Annual Exceedance Probability (AEP) flood level; • Tracker panel units will be mounted on raised frames (raised a minimum of 0.4 metres when on maximum rotation angle) and will therefore

Policy	Detail	Scheme Compliance
	Retrofitting measures to improve the energy performance of existing buildings will be encouraged in accordance with the following hierarchy: i. Reduce energy consumption through energy efficiency measures ii. Use renewable or low-carbon energy from a local/district source iii. Use building-integrated renewable or low-carbon technologies. Opportunities should be sought to facilitate carbon reduction through retrofitting at whole street or neighbourhood scales to reduce individual costs, improve viability and support coordinated programmes for improvement. **Renewable and low-carbon energy** All proposals for major development will be required to submit a Sustainable Energy Strategy alongside the planning application outlining the low-carbon strategy for the proposal. In all cases, including those listed above, proposals relating to historic buildings, listed buildings and buildings within conservation areas and world heritage sites should ensure that appropriate sensitive approaches and materials are used. Safeguarding of the significance of heritage assets should be in	be raised above surrounding ground levels and fitted with a tracking system. During times of flooding, solar panels may be stowed by the tracking system algorithm onto a horizontal plane, to the minimum post height of 2.5 metres above ground level. This ensures that all sensitive and electrical equipment on the solar panel is raised to a minimum of 2.5 metres above ground level in the horizontal position; • Protecting workers and resources from extreme weather conditions through appropriate PPE and working practices as set out in the **Outline CEMP [EN010168/APP/7.12]** and secured through the detailed CEMP under Requirement 13 in the **Draft DCO [EN010168/APP/3.1]**; and • Monitoring weather forecasts and the news for Environment Agency flood warnings, relevant weather warnings, and water levels of the local waterways as set out in the **Outline CEMP [EN010168/APP/7.12]** and secured through the detailed CEMP under Requirement 13 in the D**raft DCO [EN010168/APP/3.1].** • During operation: ○ Using equipment's cooling systems where necessary, i.e. for the BESS Area and for the standalone conversion units, and adapting working practices and equipment used based on current weather conditions; and,

Policy	Detail	Scheme Compliance
	accordance with appropriate national policy and established best practice. In all cases the impact of these requirements on the viability of development will be taken into consideration.	○ BESS Area to include Heating, Ventilation and Cooling (HVAC) systems which would be contained within the individual equipment containers. Furthermore, in preparing measures to support climate change adaptation, consideration has been given to incorporating nature-based solutions into the Scheme. Proposals for Sustainable Drainage Systems (SuDS) have been included as part of the Scheme design, as set out in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**. As detailed in the **Design Approach Document [EN010168/APP/7.3]** and Section 2 of the **Planning Statement [EN010168/APP/7.2]**, the Scheme has undergone an iterative design process which has resulted in the delivery of a functional and efficient Scheme design which will deliver large amounts of renewable and low carbon energy while being sensitive to local context and surroundings, and minimising impacts on the environment as far as practicable. The Scheme itself mitigates against the effects of climate change. There is a need to generate electricity and generating this through solar power results in less GHG emissions than other conventional methods. **ES Volume 3, Chapter 3: The Scheme**

Policy	Detail	Scheme Compliance
		[EN010168/APP/6.1] outlines how the Scheme design will retain a degree of flexibility to enable it to adapt over time, be functional and fit for purpose, and respond to innovative and new technologies as well as building resilience to climate change. The Scheme (as a renewable energy scheme) maximises the opportunity to incorporate measures to become more efficient and includes a BESS to provide flexibility, releasing energy to the NETS when it is required most. **Design Principles and Parameters [EN010168/APP/7.4]** sets out the design principles and parameters by which the Scheme has been designed and the Environmental Impact Assessment has been undertaken. The design principles have informed the parameters which are secured by Requirement 5 in the **Draft DCO [EN010168/APP/3.1]**, and apply to the detailed design of the Scheme post consent. **Sustainable construction** Section 5.2 of the **Design Approach Document [EN010168/APP/7.3]** sets out the positive design outcomes that will deliver a Scheme that is sustainable and sensitive to place over the lifetime of the development, which include (but are not limited to):

Policy	Detail	Scheme Compliance
		• Integration and enhancement of the landscape and local green infrastructure network to improve biodiversity and ecological connectivity across the Solar PV Sites. • Creation of 12.8 km of new non-vehicular permissive paths on each of the Solar PV Sites for the lifetime of the Scheme. • A Scheme that is carefully designed to ensure it is resilient to flood risk, accounting for various climate change scenarios. BREEAM assessments have not been undertaken for The Scheme as it comprises an NSIP under the Planning Act 2008. Nevertheless, climate mitigation, adaptation and resilience in development have been considered, as demonstrated above. **Existing buildings** N/A **Renewable and low-carbon energy** A Sustainable Energy Strategy has not been prepared with this application however, **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** identifies and proposes measures to address the potential effects on Climate Change, during the construction,

Policy	Detail	Scheme Compliance
		operation and maintenance, and decommissioning phases of the Scheme. While the Scheme does not directly relate to aspects of the historic environment, it has the potential to directly and indirectly impact these. **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** provides an assessment of likely significant effects on the historic environment as a result of the Scheme and concludes that following the implementation of embedded and additional mitigation measures there will be no residual significant effects on any designated or non-designated assets as a result of the Scheme. Embedded mitigation measures set out in **Outline CEMP [EN010168/APP/7.12]** will be implemented to reduce any potential significant adverse effects. The in **Outline CEMP [EN010168/APP/7.12]** will be secured by Requirement 13 of Schedule 2 of the **Draft DCO [EN010168/APP/3.1].**
Core Policy 42: Standalone Renewable Energy Installations	Proposals for standalone renewable energy schemes will be supported subject to satisfactory resolution of all site specific constraints. In particular, proposals will need to demonstrate how impacts on the following factors have been satisfactorily assessed, including any cumulative effects, and taken into account: i. The landscape, particularly in and around AONBs ii. The Western Wiltshire Green Belt iii. The New Forest National Park iv. Biodiversity	The Scheme has assessed and taken into account the considerations within Core Policy 42, including: **i. The landscape, particularly in and around AONBs** The majority of the Scheme is located outside of the Cotswold National Landscape (CNL). A very small section (2.16 ha) of the Scheme is located within the CNL and parts of Lime Down A, B and C are

Policy	Detail	Scheme Compliance
	v. The historic environment including the Stonehenge and Avebury World Heritage Site and its setting vi. Use of the local transport network vii. Residential amenity, including noise, odour, visual amenity and safety viii. Best and most versatile agricultural land. Applicants will not be required to justify the overall need for renewable energy development, either in a national or local context.	considered to be in the setting of the CNL. The works within the CNL comprise minor highway works to facilitate construction traffic. **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** sets out the alternative construction routes that were considered, and concludes that the proposed construction route through the CNL is considered to be the least constrained in terms of both meeting the needs of the Scheme and minimising environmental effects. As set out in the **Design Approach Document [EN010168/APP/7.3]** the Applicant has sought to reduce adverse impacts on the CNL by removing a number of fields from the Order Limits in areas near the CNL and also removing panels from fields in Lime Down A, B and C closest to the CNL. The Applicant has adopted a “landscape led” approach to design, giving due weight to the intrinsic character and beauty of the surrounding countryside (discussed in the **Design Approach Document [EN010168/APP/7.3]**). The proposed landscaping design is set out in **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2].**

Policy	Detail	Scheme Compliance
		ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswold National Landscape and its Special Qualities [EN010168/APP/6.3] provides a standalone assessment of the effects of the Scheme on the CNL and its Special Qualities. The landscape and visual effects of the Scheme on the CNL and its Special Qualities have been mitigated throughout the landscape led, iterative design process that has been undertaken which has been informed by the Cotswold Nature Recovery Plan and in consultation with officers at the CNL Board and Wiltshire Council. Embedded mitigation measures relating to the CNL include: • avoidance measures through the use of significant buffers for areas of the Scheme within the setting of the CNL and to maintain views. • protection of the existing landscape through buffers and offsets. • Retention and enhancement of the existing landscape framework including new planting and the re-establishment of historic hedgerows within the setting of the CNL, new areas of native woodland, trees, scrub and grassland, new planting within riparian corridors to enhance rivers and wetland, as well the restoration of dry-stone walls and creation of new ponds. • Positive enhancements to further the purpose of the CNL including, the creation of wildflower meadows, wildflower meadow verges and

Policy	Detail	Scheme Compliance
		maintaining hedgerows at their current height to maintain open view of the landscape. **ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswold National Landscape and its Special Qualities [EN010168/APP/6.3]** concludes that there are no significant direct effects on the CNL or its Special Qualities. **ii. The Western Wiltshire Green Belt** The Scheme is not located within the Western Wiltshire Green Belt and therefore this has not been assessed. **iii. The New Forest National Park** The Scheme is not located within the New Forest National Park and therefore this has not been assessed. **iv. Biodiversity** **ES Volume 1, Chapter 9: Ecology [EN010168/APP/6.1]** presents an assessment of the likely significant effects of the Scheme on features of biodiversity including designated and non-designated sites for nature conservation and concludes that no

Policy	Detail	Scheme Compliance
		significant adverse effects are anticipated on national or local sites for nature conservation. **ES Volume 1, Chapter 9: Ecology [EN010168/APP/6.1]** sets out that the design of the Scheme has evolved to avoid impacts and effects on ecology and biodiversity as far as practicable. The Scheme incorporates a number of enhancements resulting in a number of significant beneficial effects including (but not limited to): • Overall significant beneficial effects at local level on grassland and various species as a result of the reversion of the arable fields which currently dominate the Solar PV Sites to grassland for the lifetime of the Scheme; • Significant long term beneficial effects at local level relation to hedgerow and woodland habitats (as discussed in the previous section), as a result of the proposed hedgerow, woodland and tree planting outlined in the **Outline LEMP [EN010168/APP/7.18]** secured by Requirement 7 of Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**; • A significant beneficial effect at site-to-local level on the extent of standing water habitat as a result of the creation of new ponds. Details of the proposed ponds are set out in **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2]** and

Policy	Detail	Scheme Compliance
		measures for their creation are set out in the **Outline LEMP [EN010168/APP/7.18]**; and • A significant beneficial effect at site level on the quality of the local ditch and watercourse network. The Scheme is likely to result in residual adverse significant effects in relation to hedgerows in the Cable Route Corridor and on ground nesting birds at the Solar PV Sites. However, the residual significant adverse effects are limited to site and local level and are far outweighed by the residual significant beneficial effects anticipated in relation to habitats and other species including a minimum of 10% net gain for biodiversity as secured through Requirement 8 of Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**, together with the overwhelming need for and other benefits of the Scheme. v. The historic environment including the Stonehenge and Avebury World Heritage Site and its setting **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** presents an assessment of likely significant effects on the historic environment as a result of the Scheme and concludes that following the implementation of embedded and additional mitigation measures there will be no significant impacts to any designated or non-designated heritage assets

Policy	Detail	Scheme Compliance
		including listed buildings, archaeological assets and historic landscape character as a result of the Scheme. Section 12.13 of **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** sets out the cumulative effects assessment of the Scheme in relation to cultural heritage. No significant effects and no cumulative impacts have been identified as a result of the scheme and other identified projects. The Scheme has been designed, as far as practicable, to avoid and reduce impacts and effects on cultural heritage. Mitigation measures embedded into the design of the Scheme are set out in Section 12.9 of **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]**. These include (but are not limited to): • the avoidance of archaeologically sensitive areas and areas considered to cause an indirect impact to the significance of heritage assets through their setting. • the removal of Proposed Solar PV Panels entirely from various fields within the Solar PV Sites as a result of heritage or archaeological sensitivities. Due to the distance from the Scheme, the Stonehenge and Avebury World Heritage Site and its setting are not included within the assessment.

Policy	Detail	Scheme Compliance
		vi. Use of local transport network **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.1]** provides a Transport Assessment that has been prepared to assess the transport impacts of the Scheme. The various routes to the site for delivery of materials and components has been assessed in **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** and **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]**. The assessment is based on a worst-case scenario. **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** concludes that overall there will be no significant residual effects on transport and access, following the implementation of embedded and additional mitigation measures, as set out in Sections 13.9 and 13.11 of **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1].** The **Outline CTMP [EN010168/APP/7.22]** sets out measures to manage construction vehicle movements to and from the Order Limits to ensure that the effect of the construction phase and operational and maintenance phase on the local highway network is minimised. This has been produced following various stages of consultation with Wiltshire Council.

Policy	Detail	Scheme Compliance
		The **Outline CTMP [EN010168/APP/7.22],** secured by Requirement 15 of Schedule 2 of the **Draft DCO [EN010168/APP/3.1]** has the following objectives: • Minimise the number of HGVs and other vehicles on the local road network that are associated with the construction phase and operational and maintenance phase of the Scheme; • Ensure the safe movement of equipment, material and construction workers; • Minimise the effects of construction traffic on the local community; and • Set out measures to be adhered to by all associated with the construction phase and operational and maintenance phase of the Scheme. **vii. Residential amenity, including noise, odour, visual amenity and safety** **<u>Amenity</u>** **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** presents an assessment of the likely significant effects on noise and vibration as a result of the Scheme and concludes following mitigation, that no significant adverse impacted are

Policy	Detail	Scheme Compliance
		anticipated from noise during any phase of the Scheme. Mitigation measures embedded into the Scheme design are set out in Section 14.9 of **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** and detailed further in the **Outline CEMP [EN010168/APP/7.12]** and **Outline OEMP [EN010168/APP/7.13]** represent Best Practicable Means during construction and operation. These measures will be secured by Requirements within Schedule 2 of the **Draft DCO [EN010168/APP/3.1].** These measures include but are not limited to: • Ensuring that all appropriate processes, procedures and measures are in place to minimise noise before works begin and throughout the construction programme; • Screening of noise sources when in close proximity to sensitive receptors; • Maintenance and silencing of construction plant and equipment where appropriate; • Programming of works to avoid noisy operations occurring concurrently when in close proximity to sensitive receptors; • Locating construction compounds at least 250m away from residential receptors; and • Providing information to the relevant local authority and local residents to advise of potential noisy works.

Policy	Detail	Scheme Compliance
		Air quality effects, including odour, are assessed in Section 15.10 of **ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]** which concludes that, following the implementation of embedded mitigation measures, there are no significant effects on air quality as result of the Scheme. The mitigation measures embedded into the Scheme are set out in Section 15.9 of **ES Chapter 15: Air Quality [EN010168/APP/6.1]** and include: no bonfires or burning of waste materials; vehicle emissions control and operational standards for construction plant and vehicles; and the provision of shuttle buses to transport construction workers to and from the Order Limits and encouraging workers who drive to car share where practicable. These measures are set out as commitments made in the **Outline CEMP [EN010168/APP/7.12]**; commitments made in the **Outline Construction Traffic Management Plan [EN010168/APP/7.22]**; measures included in the **Outline BSMP [EN010168/APP/7.21]**; commitments made in **Outline OEMP [EN010168/APP/7.13]**; and commitments made in the **Outline Decommissioning Strategy [EN010168/APP/7.14]**. These measures will be secured by Requirements of Schedule 2 of the **Draft DCO [EN010168/APP/3.1].** **Visual Amenity** As described in **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** an extensive range of mitigation and enhancement measures are

Policy	Detail	Scheme Compliance
		proposed as part of the Scheme which reduce the landscape and visual effects of the Scheme as far as practicable. With mitigation in place, **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** concludes that in relation to visual effects, significant visual effects would be experienced by 9 private receptors during construction and at Year 1 Operation. These significant effects would fall away in Operation Year 15 and at decommissioning once landscaping has become established. For public receptors during each phase of the Scheme, **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** concludes that during construction and at Operation Year 1, 27 public receptors would experience significant visual effects. As planting matures, at Operation – Year 15 and at decommissioning, significant effects would be reduced to 10 affected public receptors. For transport receptors, **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** confirms that during construction significant visual effects would occur to 12 transport receptors, reducing to 11 receptors during Year 1 of operation and no significant visual effects occurring during operation at Year 15 or during decommissioning. In terms of visual effects in the Cable Route Corridor, 6 significant effects would occur to private receptors during construction and to 7 public receptors as set out in **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]**. These receptors are located close to the Cable Route Corridor and would experience a change in views and

Policy	Detail	Scheme Compliance
		visual amenity. No significant visual effects within the Cable Route Corridor Study Area would occur during operation (Year 1 or Year 15) or decommissioning. It should be noted that where significant long-term effects on public receptors remain at Year 15, this is primarily because mitigation is not proposed as it would not be appropriate to the long-term landscape character and the legacy landscape. For example, where footpaths diagonally cross fields, new hedgerows to screen views of infrastructure would not be consistent with the regular pattern of fields which is characteristic of the existing landscape. Other instances of significant long-term visual effects on Public Receptors relate to the local topography where there are views from higher ground to infrastructure which cannot be fully alleviated by mitigation. **Safety** In terms of safety, as the Scheme includes BESS an **Outline BSMP [EN010168/APP/7.21]** outlines the key fire safety provisions for the Scheme including measures to reduce BESS failure risks and mitigate credible failure incident scenarios. In addition, the **Outline BSMP [EN010168/APP/7.21]** provides a summary of the safety related information requirements which will be provided in advance of construction of the BESS. The purpose of **Outline BSMP [EN010168/APP/7.21]** is to identify how the

Policy	Detail	Scheme Compliance
		Applicant will use good industry practice to reduce risk to life, property, and the environment from the BESS. This will be secured by Requirement 6 of Schedule 2 of the **Draft DCO [EN010168/APP/3.1].** **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** provides further details on fencing and security measures such as CCTV systems which will be used around the operational perimeter of the operational elements of the Scheme. Fencing details are secured under Requirement 10 (fencing and other means of enclosed) of the **Draft DCO [EN010168/APP/3.1]**. **viii. Best and most versatile agricultural land** Table 17.6 of **ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]** shows the distribution of Agricultural Land (ALC) Grades within the Solar PV Sites, determined by a detailed soil survey included in **ES Volume 3, Appendix 17-1: Agricultural Land Classification and Soil Resource Survey Report [EN010168/APP/6.3]**. Agricultural land was a key consideration during the site selection process as detailed in **ES Volume 3, Appendix 4-1 Site Selection Assessment Report [EN010168/APP/6.3].** A six stage approach was adopted when assessing other suitable alternative

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		sites for the Scheme and confirms that in the initial search for sites, agricultural land within a classification of Grade 3, Grade 2 or Grade 1 was excluded from the search in order to identify sites on non-BMV land. In addition non-agricultural land, such as rooftops and previously developed land was considered, however none of the alternative sites (on non-agricultural land or lower quality agricultural land) were assessed to be viable for the Scheme, and therefore Grade 3 agricultural land was added to the search area. This included a preference not to site on best and most versatile agricultural land. The results of soil surveys are set out in **ES Volume 3, Appendix 17-1 Agricultural Land Classification and Soil Resource Survey Report [EN010168/APP/6.3].** The majority of the Solar PV Sites (67%) comprise land within Subgrades 3b and 4 and therefore is not best and most versatile (BMV) agricultural land. Approximately 240 ha of the Solar PV Sites is classified as BMV quality, mostly in Subgrade 3a (the lowest grade of BMV land) (29%) with a small proportion of Grade 2 (4%). There is no Grade 1 land (being the highest grade) within the Solar PV Sites. **ES Volume 1, Chapter 17: Soils and Agriculture [EN010168/APP/6.1]** sets out the embedded and additional mitigation incorporated into the Scheme design to minimise impacts on soils. This includes preparation of and adherence to the **Outline SRMP**

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		[EN010168/APP/7.15] as well as the overarching **Outline CEMP [EN010168/APP/7.12]** which will incorporate good practice measures to ensure adverse effects on agricultural land and soil are minimised wherever possible. The Scheme is temporary and reversible in nature and therefore will not affect the long-term agricultural resource. Upon decommissioning, all land (including the BESS Area and substations) will be returned to its previous use and condition as far as is practicable. The decommissioning measures set out in the **Outline Decommissioning Strategy [EN010168/APP/7.14]** are secured by Requirement 20 in Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**. The design of the Solar PV Sites allows some farming practices to continue during operation of the Scheme, such as sheep grazing, therefore, whilst the land would not be available for crop production, there may be an opportunity to limit the effects on agricultural production during the Scheme's lifetime through other forms of agricultural practice.
Core Policy 50: Biodiversity and Geodiversity	**Protection** Development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained,	An assessment of the likely significant effects of the Scheme on features of biodiversity including designated and non-designated sites for nature conservation is presented in **ES Volume 1, Chapter 9: Ecology [EN010168/APP/6.1]**.

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	buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term. Where it has been demonstrated that such features cannot be retained, removal or damage shall only be acceptable in circumstances where the anticipated ecological impacts have been mitigated as far as possible and appropriate compensatory measures can be secured to ensure no net loss of the local biodiversity resource, and secure the integrity of local ecological networks and provision of ecosystem services. All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development. Any development potentially affecting a Natura 2000 site must provide avoidance measures in accordance with the strategic plans or guidance set out in paragraphs 6.75-6.77 above where possible, otherwise bespoke measures must be provided to demonstrate that the proposals would have no adverse effect upon the Natura 2000 network. Any development that would have an adverse effect on the integrity of a European nature conservation site will not be in accordance with the Core Strategy. **Biodiversity enhancement**	**Protection** Throughout the Scheme's design process, impacts and effects on ecology and biodiversity have been avoided as far as practicable. **ES Volume 1, Chapter 9: Ecology [EN010168/APP/6.1]** sets out avoidance measures, embedded mitigation measures (Section 9.9), and additional mitigation measures (Section 9.12) in relation to habitats and species. Through these measures, the Applicant has demonstrated the following: • Construction activities confined to the minimum areas required for the works through micro-siting of the Cable Route Corridor. • Measures have been incorporated into the **Outline EPMS [EN010168/APP/7.19]** including sensitive seasonal timing of works. • As outlined in the **Outline CEMP [EN010168/APP/7.12]** an Environmental Manager will be responsible for the overall management of environmental aspects on site, ensuring environmental legislation and best practices are complied with, and environmental mitigation and monitoring measures identified are implemented. Ecological buffer zones have also been incorporated in the Scheme design and will be secured through implementation of the **Outline EPMS [EN010168/APP/7.19]** and the **Outline LEMP**

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	All development should seek opportunities to enhance biodiversity. Major development in particular must include measures to deliver biodiversity gains through opportunities to restore, enhance and create valuable habitats, ecological networks and ecosystem services. Such enhancement measures will contribute to the objectives and targets of the Biodiversity Action Plan (BAP) or River Basin/ Catchment Management Plan, particularly through landscape scale projects, and be relevant to the local landscape character. **Local sites** Sustainable development will avoid direct and indirect impacts upon local sites through sensitive site location and layout, and by maintaining sufficient buffers and ecological connectivity with the wider environment. Damage or disturbance to local sites will generally be unacceptable, other than in exceptional circumstances where it has been demonstrated that such impacts: i. cannot reasonably be avoided ii. are reduced as far as possible iii. are outweighed by other planning considerations in the public interest iv. where appropriate compensation measures can be secured through planning obligations or agreements.	**[EN010168/APP/7.18]**. The measurement criteria are as follows: • 8 m minimum from ditches; • 10 m minimum from ditches with signs of water vole, ponds where GCN are absent, 'outlying' or 'annexe' badger sett, or individual trees. • 15 m minimum from all woodland, hedgerows, lines of trees, and designated sites, as well as some minor watercourses depending on their ecological value; • 30 m minimum from 'main' or 'subsidiary' badger setts; and • 50 m from ponds with confirmed evidence of GCN, or where the presence of great crested newts has been assumed due to inconclusive results. **ES Volume 1, Chapter 9: Ecology [EN010168/APP/6.1]** confirms the Scheme will have no significant effects on any statutory designated sites. **<u>Biodiversity Enhancement</u>** **ES Volume 1, Chapter 9: Ecology [EN010168/APP/6.1]** sets out that the design of the Scheme has evolved to avoid impacts and effects on ecology and biodiversity as far as practicable. The Scheme incorporates a number of enhancements

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	Development proposals affecting local sites must make a reasonable contribution to their favourable management in the long-term.	resulting in a number of significant beneficial effects including (but not limited to): • Overall significant beneficial effects at local level on grassland and various species as a result of the reversion of the arable fields which currently dominate the Solar PV Sites to grassland for the lifetime of the Scheme; • Significant long term beneficial effects at a local level in relation to hedgerow and woodland habitats as a result of the proposed hedgerow, woodland and tree planting outlined in the **Outline LEMP [EN010168/APP/7.18]**; • A significant beneficial effect at site-to-local level on the extent of standing water habitat as a result of the creation of new ponds. Details of the proposed ponds are set out in **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2]** and measures for their creation are set out in the **Outline LEMP [EN010168/APP/7.18]**; and • A significant beneficial effect at site level on the quality of the local ditch and watercourse network. The Applicant is committed to delivering BNG. The Scheme will deliver, as a minimum, 10% BNG, which is secured via Requirement 9 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**. The **BNG Assessment Report [EN010168/APP/7.8]** indicates that BNG in excess of 10% will be achieved, with a

Policy	Detail	Scheme Compliance
		total net gain of 63.80% for area habitat units, 19.35% for hedgerow units and 25.30% for watercourse units in relation to the Solar PV Sites. The total net gain for the whole Scheme (i.e. Solar PV Sites and Cable Route Corridor combined) is 34.75% for area habitat units, 12.31% for hedgerow units and 20.08% for watercourse units, as set out in the **BNG Assessment Report [EN010168/APP/7.8]**. This is aligned with the proposals in the **Outline LEMP [EN010168/APP/7.18]**. The BNG report [**EN010168/APP/7.8**]) demonstrates that the Scheme has the potential to achieve significant biodiversity net gain on site. **Local Sites** **ES Volume 1, Chapter 9: Ecology [EN010168/APP/6.1]** confirms that the Scheme will have no significant effects on any non-designated sites including Local Sites.
Core Policy 51: Landscape	Development should protect, conserve and where possible enhance landscape character and must not have a harmful impact upon landscape character, while any negative impacts must be mitigated as far as possible through sensitive design and landscape measures. Proposals should be informed by and sympathetic to the distinctive character areas identified in the relevant Landscape Character Assessment(s) and any other relevant assessments and studies. In particular, proposals will need to demonstrate that the following aspects of landscape character have been	**Design Process** As set out in the **Design Approach Document [EN010168/APP/7.3],** the Applicant has adopted a "landscape led" approach to design, giving due weight to the intrinsic character and beauty of the surrounding countryside. Design matters relating to landscape and visual elements have been informed by desk studies, detailed fieldwork and having regard to feedback from consultation responses (as set out in Tables 1-1 and 1-

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	conserved and where possible enhanced through sensitive design, landscape mitigation and enhancement measures: i. The locally distinctive pattern and species composition of natural features such as trees, hedgerows, woodland, fi eld boundaries, watercourses and waterbodies. ii. The locally distinctive character of settlements and their landscape settings. iii. The separate identity of settlements and the transition between man-made and natural landscapes at the urban fringe. iv. Visually sensitive skylines, soils, geological and topographical features. v. Landscape features of cultural, historic and heritage value. vi. Important views and visual amenity. vii. Tranquillity and the need to protect against intrusion from light pollution, noise, and motion. viii. Landscape functions including places to live, work, relax and recreate. ix. Special qualities of Areas of Outstanding Natural Beauty (AONBs) and the New Forest National Park, where great weight will be afforded to conserving and enhancing landscapes and scenic beauty. Proposals for development within or affecting the Areas of Outstanding Natural Beauty (AONBs), New Forest National Park (NFNP) or Stonehenge and Avebury World Heritage Site (WHS) shall demonstrate that they	2 of **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** and in the **Consultation Report [EN010168/APP/5.1]**). These activities enabled an early understanding of the Site and its context with respect to landscape and visual matters. The iterative design process has minimised landscape and visual effects including having regard to the special qualities of the CNL and to 'further the purpose' of the CNL. This has included: • The removal of panels within the setting of the CNL in Lime Down A, B and C where there is a strong relationship between the CNL and the Scheme; • Incorporation of embedded mitigation into the Scheme design with respect to offsets and buffers; • Inclusion of embedded landscape design parameters as set out **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]**; • Enhancement measures to 'further the purpose' of the CNL; and • Specific management regimes with respect to Lime Down A, B and C including wildflower meadow verges and maintaining hedgerows at their current height of approximately 1.5m (or as existing if greater) bordering the CNL within Lime Down C. **Assessment**

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	have taken account of the objectives, policies and actions set out in the relevant Management Plans for these areas. Proposals for development outside of an AONB that is sufficiently prominent (in terms of its siting or scale) to have an impact on the area's special qualities (as set out in the relevant management plan), must also demonstrate that it would not adversely affect its setting.	**ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** sets out that with regard to the landscape effects of the Solar PV Sites, there would not be significant landscape effects upon the landscape fabric during construction or operation in Year 1. Once mitigation measures are established, significant beneficial effects would occur during operation from Year 15 and at decommissioning through enhancement to the landscape fabric. **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** also concludes that there would be significant adverse effects in the 1km local study area during construction and in Year 1 of operation which is primarily related to the change in land use from agriculture to the Scheme. At Year 15 and decommissioning the effect reduces to not significant. With regard to the Cable Route Corridor, no significant landscape effects would occur within the Cable Route Corridor Study Area with all effects being short term and temporary in nature with cables placed underground. Further in relation to post decommissioning and the legacy landscape, **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** concludes that the site would benefit from the significantly enhanced tree and hedgerow planting that has been carried out and has matured to create a much stronger and robust landscape, retaining, and enhancing the overall character and providing considerable biodiversity

Policy	Detail	Scheme Compliance
		benefits over the years. As a result the landscape would be left in a better condition than current day. *(For visual assessment outcomes see above under 'Visual Amenity').* In terms of setting of the CNL, **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** sets out that the avoidance measures adopted (avoiding development adjacent to the National Landscape where it would affect its setting and avoiding development where it would be visually intrusive and affect the character and visual experience of the landscape).prevent harm to the CNL and also provide opportunities for positive enhancement within the setting of the CNL. These measures contribute to the substantial increase in vegetation across the scheme. **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** states that the significant adverse landscape effects within the 1 km local study area are primarily related to the change in land use from agriculture to the solar farm and that this change does not directly affect the CNL as the buffer to the development provided by the avoidance measures and layers of proposed mitigation planting contains the development away from the edge of the CNL. As such, the development would be barely discernible from within the CNL. Harm to the CNL itself would be minimal, (lasting as long as it takes for the planting to become appropriately established) with beneficial landscape effects within the setting of the CNL having effect in the long term, including as a legacy following

Policy	Detail	Scheme Compliance
		decommissioning of the Scheme, which would further the purposes of the designation. **ES Volume 3, Appendix 8-6: Assessment of Effects on the Cotswolds National Landscape and it's Special Qualities [EN010168/APP/6.3]** provides a standalone assessment of the effects of the Scheme on the CNL and its Special Qualities. The landscape and visual effects of the Scheme on the CNL and its Special Qualities have been mitigated throughout the landscape led, iterative design process that has been undertaken which has been informed by the Cotswold Nature Recovery Plan and in consultation with officers at the CNL Board and Wiltshire Council. Embedded mitigation measures relating to the CNL include: • avoidance measures through the use of significant buffers for areas of the Scheme within the setting of the CNL and to maintain views; • protection of the existing landscape through buffers and offsets; • Retention and enhancement of the existing landscape framework including new planting and the re-establishment of historic hedgerows within the setting of the CNL, new areas of native woodland, trees, scrub and grassland, new planting within riparian corridors to enhance rivers and wetland, as well the restoration of dry-stone walls and creation of new ponds; and • Positive enhancements to further the purpose of the CNL including, the creation of wildflower

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		meadows, wildflower meadow verges and maintaining hedgerows at their current height to maintain open view of the landscape. **ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and it's Special Qualities [EN010168/APP/6.3]** concludes that there are no significant direct effects on the CNL or its Special Qualities as a result of the Scheme. Embedded mitigation and enhancement measures are incorporated into the Scheme as shown within **ES Volume 2, Chapter 3: Scheme Description [EN010168/APP/6.1]** and **Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2],** which forms part of the **Outline Landscape and Ecological Management Plan [EN010168/APP/7.18]**. Requirement 7 of the **Draft DCO [EN010168/APP/3.1]** requires the submission and approval of a landscape and ecological management plan to be substantially in accordance with the **Outline Landscape and Ecological Management Plan [EN010168/APP/7.18]** and for the landscape and ecological management plan to be implemented as approved. These measures and controls will ensure that the detailed design of the Scheme incorporates the landscape mitigation and enhancements included within the **Outline Landscape and Ecological Management Plan [EN010168/APP/7.18]**.
Core Policy 52: Green Infrastructure	Development shall make provision for the retention and enhancement of Wiltshire's green infrastructure	The Scheme has been designed to avoid, maintain and mitigate significant adverse effects on

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	network, and shall ensure that suitable links to the network are provided and maintained. Where development is permitted developers will be required to: i. retain and enhance existing on site green infrastructure ii. make provision for accessible open spaces in accordance with the requirements of the adopted Wiltshire Open Space Standards iii. put measures in place to ensure appropriate long-term management of any green infrastructure directly related to the development iv. provide appropriate contributions towards the delivery of the Wiltshire Green Infrastructure Strategy v. identify and provide opportunities to enhance and improve linkages between the natural and historic landscapes of Wiltshire. If damage or loss of existing green infrastructure is unavoidable, the creation of new or replacement green infrastructure equal to or above its current value and quality, that maintains the integrity and functionality of the green infrastructure network, will be required. Proposals for major development should be accompanied by an audit of the existing green infrastructure within and around the site and a statement demonstrating how this will be retained and enhanced through the development process.	internationally, nationally and locally designated sites and other important ecological features such as protected species and habitats, ancient and veteran trees, and green infrastructure during the construction, operation and decommissioning phases. This has been achieved through an iterative design process, as explained in the **Design Approach Document [EN010168/APP/7.3]**, that has considered and integrated green (for example, woodland and tree planting) and blue (for example, the creation of wetland habitats) infrastructure into the design of the Scheme, informed by a design team with qualified professional ecologists. The **Outline LEMP [EN010168/APP/7.18]** sets out the mitigation measures which are secured by Requirement 7 in Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**. Section 4.2 of the **Design Approach Document [EN010168/APP/7.3]** sets out the positive design outcomes of the Scheme to ensure it is sustainable and sensitive to place, including green infrastructure considerations. The Scheme design integrates with the landscape, and where practicable, enhances the landscape and local green infrastructure network, to improve biodiversity and ecological connectivity across the Solar PV Sites. Enhancement measures will contribute to and strengthen the connectivity between a number of the Local Wildlife Sites located close to the Solar PV Sites and the local landscape, through the provision of new hedgerows, tree and woodland

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	Development will not adversely affect the integrity and value of the green infrastructure network, prejudice the delivery of the Wiltshire Green Infrastructure Strategy, or provide inadequate green infrastructure mitigation. Green infrastructure projects and initiatives that contribute to the delivery of a high quality and highly valued multi-functional green infrastructure network in accordance with the Wiltshire Green Infrastructure Strategy will be supported. Contributions (financial or other) to support such projects and initiatives will be required where appropriate from developers.	planting in the vicinity of the sites, and through the creation of areas of species rich grassland and scrub planting within the Solar PV Sites, which may provide ecological 'stepping stones' for various species within the local, largely arable landscape. **Design Principles and Parameters [EN010168/APP/7.4]** sets out the design principles and parameters by which the Scheme has been designed, and the Environmental Impact Assessment has been undertaken. The design principles have informed the parameters which are secured by Requirement 5 in Schedule 2 of the **Draft DCO [EN010168/APP/3.1]** and apply to the detailed design of the Scheme post consent. The Landscape Strategy set out in the **Outline LEMP [EN010168/APP/7.18]** aims to set out the approach to habitat creation and management in order to provide ecological enhancements, strengthen the green infrastructure within the local area, and to provide landscape and visual mitigation through screening of the Scheme. The **Outline LEMP [EN010168/APP/7.18]** draws upon the Draft Wiltshire Local Nature Recovery Strategy and sets out that the Scheme as designed will broadly contribute to these priorities. The **Outline LEMP [EN010168/APP/7.18]** will be secured by Requirement 7 in Schedule 2 of the **Draft DCO [EN010168/APP/3.1].**

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		Further, significant tree and woodland planting is proposed within the Order Limits as outlined in the **Outline LEMP [EN010168/APP/7.18]**, which will result in the creation of 11.37 ha of new native broadleaved woodland. Locations for planting have been directed by the need for landscaping and visual impact mitigation, but opportunities have also been taken to connect habitat parcels. Once established, this level of woodland planting will result in a significant beneficial effect on the extent of woodland within the Order Limits, which would, by extension, contribute to the connectivity of woodland stands and green Infrastructure across the local landscape.
Core Policy 55: Air Quality	Development proposals, which by virtue of their scale, nature or location are likely to exacerbate existing areas of poor air quality, will need to demonstrate that measures can be taken to effectively mitigate emission levels in order to protect public health, environmental quality and amenity. Mitigation measures should demonstrate how they will make a positive contribution to the aims of the Air Quality Strategy for Wiltshire and where relevant, the Wiltshire Air Quality Action Plan. Mitigation may include: i. landscaping, bunding or separation to increase distance from highways and junctions ii. possible traffic management or highway improvements to be agreed with the local authority iii. abatement technology and incorporating site layout/separation and other conditions in site planning	**ES Volume 1, Chapter 15: Air Quality [EN010168/APP/6.1]** assesses the likely significant effects of the Scheme on air quality. The assessment concludes that, with embedded mitigation, such as installation of signs along construction traffic routes to direct vehicles, vehicle emissions control and operational standards for construction plant and vehicles, as set out in the **Outline CTMP [EN010168/APP/7.22]** which will be secured by Requirement 14 of Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**, no likely significant effects are identified in relation to air quality as a result of the Scheme. No additional mitigation or monitoring is proposed. The **Outline CEMP [EN010168/APP/7.12]**, secured by Requirement 13 in Schedule 2 of the **Draft DCO**

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	iv. traffic routing, site management, site layout and phasing v. where appropriate, contributions will be sought toward the mitigation of the impact a development may have on levels of air pollutants.	**[EN010168/APP/3.1]**, further details the traffic management measures that have been embedded into the Scheme to mitigate against air quality impacts including (but not limited to): • Imposing and signposting a maximum-speed-limit of 15mph on surfaced and 10mph on unsurfaced haul roads and work areas (if long haul routes are required, these speeds may be increased with suitable additional control measures provided, subject to the approval of the nominated undertaker and with the agreement of the local authorities, where appropriate). • Producing a Construction Traffic Management Plan to manage the sustainable delivery of goods and materials. • Implementing a Travel Plan that supports and encourages sustainable travel (public transport, cycling, walking, and car-sharing). The **Outline CEMP [EN010168/APP/7.12]** also includes measures to incorporate site layout/separation into the construction of the Scheme including: • Planning site layout so that machinery and dust causing activities are located away from receptors, as far as is possible. • Erecting solid screens or barriers around dusty activities or the site boundary so that are at least as high as any stockpiles on site.

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		• Fully enclosing site or specific operations where there is a high potential for dust production and the site is active for an extensive period. During construction, an appointed contractor(s) will ensure that the impacts from construction traffic on the local community (including local residents and businesses and users of the surrounding transport network) are minimised, where reasonably practicable, by implementing the measures set out in the **Outline CTMP [EN010168/APP/7.22]**. In terms of traffic routing, the **Outline CTMP [EN010168/APP/7.22]** provides details of the designated routes for HGV movements and worker car movements. It also details any measures designed to reduce travel during peak hours on the local road network.
Core Policy 56: Contaminated Land	Development proposals which are likely to be on or adjacent to land which may have been subject to contamination will need to demonstrate that measures can be taken to effectively mitigate the impacts of land contamination on public health, environmental quality, the built environment and amenity. Developers will be required to demonstrate that the development site is, or will be, made suitable for the proposed final use and will need to provide one or more of the following documents: i. Detailed site history identifying possibly contaminative uses.	Contamination is assessed in **ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1]**. Preliminary Risk Assessments (PRA) have been undertaken for each of the Solar PV Sites and the Cable Route Corridor to assess the current land condition within the Order Limits and identify any potential contaminants. The PRAs are included at **ES Volume 3, Appendices 19-1 to 19-8 [EN0101068/APP/6.3]** and the key findings are set out in **ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP6.1]**.

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	ii. Site characterisation: The nature and extent of any contamination and the hazards and risks posed. iii. Detailed remediation scheme: Including methodology and quality assurance. iv. Methodology to report unexpected contamination. v. Methodology to ensure verification of remedial works. vi. Details of long term monitoring and maintenance proposals (where necessary). The need for, type and complexity of reports will depend on the specific site	Historic sources of contamination are considered in **ES Volume 3, Appendices 19-1 to 19-8 [EN010168/APP/6.3]**. The assessment in **ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1]** sets out the nature and extent of any contamination on the site and risks posed by this. **ES Volume 1, Chapter 19: Ground Conditions [EN010168/APP/6.1]** concludes that, with implementation of the embedded and additional mitigation measures as set out in Sections 19.10 and 19.12 of the chapter, no likely residual significant effects are anticipated. This includes (but is not limited to): • The requirement for a discovery and inspection strategy has been included in the **Outline CEMP [EN010168/APP/7.12]** which details the requirements and procedures for encountering land contamination, should contaminated land be encountered. • The requirement for a discovery and inspection strategy has been included in the **Outline CEMP [EN010168/APP/7.12]** which details the requirements and procedures for encountering land contamination, should contaminated land be encountered. • Where the use of pesticides or herbicides is necessary for the maintenance of the operational site, all substances used will be used in accordance with guidelines on

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		application rate and safe use and in full consideration of the hazards outlined on the Material Safety Data Sheet (MSDS) issued by the manufacturer, as set out in the **Outline OEMP [EN010168/APP/7.13]**. Mitigation is set out in the **Outline CEMP [EN010168/APP/7.12], Outline SWMP [EN010168/APP/7.16]** and **Outline SRMP [EN010168/APP/7.15]** to manage the hazards associated with contaminants during the construction phase of the development, and similarly measures in the **Outline OEMP [EN010168/APP/7.13]** and **Outline Decommissioning Strategy [EN010168/APP/7.14]** for the operation and maintenance and decommissioning phases. Measures set out in the outline management plans will be secured by Requirements in Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**.
Core Policy 57: Ensuring High Quality Design and Place Shaping	A high standard of design is required in all new developments, including extensions, alterations, and changes of use of existing buildings. Development is expected to create a strong sense of place through drawing on the local context and being complementary to the locality. Applications for new development must be accompanied by appropriate information to demonstrate how the proposal will make a positive contribution to the character of Wiltshire through: i. enhancing local distinctiveness by responding to the value of the natural and historic	Section 4.2 of the **Design Approach Document [EN010168/APP/7.3]** sets out the positive design outcomes that will deliver a Scheme that is sustainable and sensitive to place over the lifetime of the development. The **Design Approach Document [EN010168/APP/7.3]** demonstrates how the Scheme will result in sustainable infrastructure that is sensitive to place by delivering a design that has followed the mitigation hierarchy to avoid and reduce impacts as far as possible, integrates with the landscape, provides ecological and landscape enhancements and improves

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	environment, relating positively to its landscape setting and the existing pattern of development and responding to local topography by ensuring that important views into, within and out of the site are to be retained and enhanced ii. the retention and enhancement of existing important landscaping and natural features, (e.g. trees, hedges, banks and watercourses), in order to take opportunities to enhance biodiversity, create wildlife and recreational corridors, effectively integrate the development into its setting and to justify and mitigate against any losses that may occur through the development iii. responding positively to the existing townscape and landscape features in terms of building layouts, built form, height, mass, scale, building line, plot size, elevational design, materials, streetscape and rooflines to effectively integrate the building into its setting iv. being sympathetic to and conserving historic buildings and historic landscapes v. the maximisation of opportunities for sustainable construction techniques, use of renewable energy sources and ensuring buildings and spaces are orientated to gain maximum benefit from sunlight and passive solar energy, in accordance with Core Policy 41 (Sustainable Construction and Low Carbon Energy) vi. making efficient use of land whilst taking account of the characteristics of the site and the	recreational facilities in the area through the creation of 12.8 km of new permissive paths, which will be open up to 365 days per calendar year throughout the proposed 60-year operational lifetime of the Scheme. i) Section 3.5 of the **Design Approach Document [EN010168/APP/7.3]** sets out how the local landscape context and historic context were considered from an early stage to inform the adoption of design principles that result in a Scheme sympathetic to the landscape and historic context of the area. Design principle 1 sets out how the Scheme is 'landscape led' and gives due weight to the intrinsic character and beauty of the surrounding countryside, while design principle 7 sets out that the design of the Scheme will be sensitive to above and below ground heritage assets and their setting, by locating infrastructure at a suitable distance and through appropriate landscape screening. **Design Principles and Parameters [EN010168/APP/7.4]** sets out the design principles and parameters by which the Scheme has been designed and the Environmental Impact Assessment has been undertaken. The design principles have informed the parameters which are secured by Requirement 5 in the **Draft DCO [EN010168/APP/3.1]**, and apply to the detailed design of the Scheme post consent.

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	local context to deliver an appropriate development which relates effectively to the immediate setting and to the wider character of the area vii. having regard to the compatibility of adjoining buildings and uses, the impact on the amenities of existing occupants, and ensuring that appropriate levels of amenity are achievable within the development itself, including the consideration of privacy, overshadowing, vibration, and pollution (e.g. light intrusion, noise, smoke, fumes, effluent, waste or litter) viii. incorporating measures to reduce any actual or perceived opportunities for crime or antisocial behaviour on the site and in the surrounding area through the creation of visually attractive frontages that have windows and doors located to assist in the informal surveillance of public and shared areas by occupants of the site ix. ensuring that the public realm, including new roads and other rights of way, are designed to create places of character which are legible, safe and accessible in accordance with Core Policy 66 (Strategic Transport Network) x. the sensitive design of advertisements and signage, which are appropriate and sympathetic to their local setting by means of scale, design, lighting and materials xi. taking account of the needs of potential occupants, through planning for diversity and adaptability, and considering how buildings and	ii) The Applicant has also taken opportunities to incorporate ecological and landscape enhancements such as new hedgerow and tree planting as set out in the **Outline LEMP [EN010168/APP/7.18]**, and deliver a net gain in biodiversity as set out in the **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]**. The Scheme incorporates a number of enhancements resulting in a number of significant beneficial effects including (but not limited to): • Overall significant beneficial effects at local level on grassland and various species as a result of the reversion of the arable fields which currently dominate the Solar PV Sites to grassland for the lifetime of the Scheme; • Significant long term beneficial effects at local level in relation to hedgerow and woodland habitats as a result of the proposed hedgerow, woodland and tree planting outlined in the **Outline LEMP [EN010168/APP/7.18]** This will be secured by Requirement 7 in Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**; • A significant beneficial effect at site-to-local level on the extent of standing water habitat as a result of the creation of new ponds. Details of the proposed ponds are set out in **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2]** and

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	space will be used in the immediate and long term future xii. the use of high standards of building materials, finishes and landscaping, including the provision of street furniture and the integration of art and design in the public realm xiii. the case of major developments, ensuring they are accompanied by a detailed design statement and masterplan, which is based on an analysis of the local context and assessment of constraints and opportunities of the site and is informed by a development concept, including clearly stated design principles, which will underpin the character of the new place xiv. meeting the requirements of Core Policy 61 (Transport and New Development).	measures for their creation are set out in the **Outline LEMP [EN010168/APP/7.18]**; and • A significant beneficial effect at site level on the quality of the local ditch and watercourse network. iii) The Scheme is rural in nature and will not impact on Wiltshire's existing townscape and landscape features in terms of building layouts, mass, scale, materials, streetscape and rooflines. As demonstrated in the **Design Approach Document [EN010168/APP/7.3]**, the Scheme will result in sustainable infrastructure that is sensitive to place by delivering a design that has followed the mitigation hierarchy to avoid and reduce impacts as far as possible, integrates with the landscape, provides ecological and landscape enhancements and improves recreational facilities in the area through the creation of 12.8 km of new permissive paths, which will be open up to 365 days per calendar year throughout the proposed 60-year operational lifetime of the Scheme. iv) **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** and its accompanying appendices sets out the assessment of the Scheme's

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		impact on the historic environment, in line with the assessment criteria required by the NPSs and other relevant policy and legislation. The impact on each asset, and the relevant embedded and additional mitigation measures are set out in full within **ES Volume 3, Appendix 12-8: Cultural Heritage Impact Assessment Tables [EN010168/APP/6.3]**. With embedded mitigation, no significant effects are anticipated in relation to conservation areas, registered parks and gardens, or scheduled monuments during each phase of the Scheme. For listed buildings, with embedded mitigation, no significant adverse effects are anticipated for each phase of the Scheme, although non-significant effects are expected in relation to some assets. For non-designated heritage assets, with embedded mitigation, no significant adverse effects are anticipated for each phase of the Scheme. Significant adverse effects, in the absence of additional mitigation, have been identified for 17 archaeological assets. However, following application of additional mitigation, the residual effect would be reduced to negligible, which is not significant.

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		The proposed embedded mitigation includes: design decisions to remove Solar PV Panels from various fields (or parts of them) within the Solar PV Sites as a result of heritage or archaeological sensitivities; the incorporation of enhanced visual screening through planting and distance offsets between the Scheme and heritage assets; and appropriate construction methods such as HDD in order to protect archaeological remains. Additional mitigation proposed includes an overarching Archaeological Mitigation Strategy, which details the additional mitigation during the construction phase of the Scheme (see **Volume 3, Appendix 12-6: Archaeological Mitigation Strategy [EN010168/APP/6.3]**). See above for commentary in relation to landscape and visual effects. v) **ES Volume 3, Chapter 3: The Scheme [EN010168/APP/6.1]** outlines the Scheme design will retain a degree of flexibility to enable it to adapt over time, be functional and fit for purpose, and respond to innovative and new technologies as well as building resilience to climate change. The Scheme (as a renewable energy scheme) maximises the opportunity to incorporate measures to become more efficient and

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		includes a BESS to provide flexibility, releasing energy to the NETS when it is required most. vi) **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3]** sets out the methodology adopted when assessing other suitable alternative sites for the Scheme. It also sets out how the Applicant considered alternatives including non-agricultural land, such as rooftops and previously developed land. Ultimately, none of the alternative sites were assessed to be viable for the Scheme. The Scheme will deliver large amounts of cheap, secure, and low carbon electricity over its 60-year operational lifetime and represents a significant and commercially rational step forward in the fight against the global climate emergency. Therefore, it represents an efficient use of land. vii) As detailed in the **Design Approach Document [EN010168/APP/7.3]** the Scheme has adopted design principles including a design principle to ensure the Scheme will be carefully designed to minimise where practicable impacts on amenity from air quality, traffic and noise effects and safeguard the health and safety of local residents by securing suitable control

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		measures during construction, operation and maintenance and decommissioning of the Scheme. **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 and **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** provides an assessment of the noise impacts. Following the implementation of mitigation measures detailed within the **CEMP [EN010168/APP/7.12]**, the **CTMP [EN010168/APP/7.22]**, the **BSMP [EN010168/APP/7.21]**, the **OEMP [EN010168/APP/7.13]**, and the **Outline Decommissioning Strategy [EN010168/APP/7.14]**, there are no significant effects anticipated from the construction, operation and decommissioning of the Scheme on amenity. These will be secured by Requirements in Schedule 2 of the **Draft DCO [EN010168/APP/3.1].** viii) Security measures, including fencing and CCTV are set out in **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]**. These measures include deer wire mesh and wooden post fencing, palisade fencing around the substations and BESS Area, and pole mounted internal facing CCTV around the permitter of the operational elements of the Solar PV Sites.

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		ix) In terms of Public Rights of Ways, an **Outline PRoW and Permissive Paths Management Plan [EN010168/APP/7.17]** forms embedded mitigation and will provide management measures to ensure the effects of the construction phase on PRoW users is minimised. Measures include targeting driver behaviours and providing banksmen to control sensitive points on HGV routes where there is interaction with PRoW. There are also specific measures for the diversion of footpath WT|GRIT|20 and bridleway WT|MALW|54, where access to Cable Route Corridor works east of Grittleton, and HGV access to Lime Down E are taken respectively. These diversions are proposed to reduce the number of instances in which PRoW users and construction traffic are in conflict, such as crossing points, or using the same route, to ensure PRoW users are not exposed to significant effects on their use of the PRoW or their health and safety. Similar measures will be introduced during replacement activities and during decommissioning. The Scheme includes the creation of 12.8 km of new non-vehicular permissive paths on each of the Solar PV Sites for the lifetime of the Scheme to provide pedestrians and horse and bicycle riders improved accessibility to the countryside and improved connectivity of the wider PRoW network. The location

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		of the proposed permissive paths is outlined on the **Works Plan [EN010168/APP/2.3]** as Work No.10B**.** The design and implementation of the proposed permissive paths is set out in the **Outline Public Rights of Way and Permissive Paths Management Plan [EN010168/APP/7.17]** and their creation and maintenance are secured through a Requirement in Schedule 2 to **the Draft DCO [EN010168/APP/3.1]**. x) The Scheme does not propose advertisements. In terms of signage, as set out in the **Outline CTMP [EN010168/APP/7.22]** temporary road signage will be implemented along designated routes to inform background traffic of the ongoing construction works and to direct construction traffic to and from the Site. The signs will be located at key points along the route, including junctions. All signage will be compliant with Chapter 8 of the Traffic Signs Manual where applicable. The following points will be considered when locating signage: • The position of the sign in relation to the highway; • Possible distraction to drivers; and • The proximity to junctions and roundabouts.

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		The signage strategy will be agreed with the local highway authority through the final CTMP which is secured by Requirement 14 of Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**. xi) The Scheme will not have any potential occupants. xii) Due to the nature of the Scheme, it does not propose to include the provision of street furniture or integration of art or design in the public realm. xiii) The application is supported by a **Design Approach Document [EN010168/APP/7.3]** that sets out how good design has been embedded into the design process of the Scheme. It explains the key considerations that have influenced the design of the Scheme, including policy and guidance, the project brief, the expertise of the design team, the local context (including constraints and opportunities), the design vision and design principles, the outcome of environmental surveys and assessments, and the

Policy	Detail	Scheme Compliance
		feedback received from non-statutory, statutory and targeted consultation. The Scheme has adopted design principles to provide a framework for development of the design in the pre-application stage. These are set out in detail Section 3.7 of the **Design Approach Document [EN010168/APP/7.3]** and consider the following: • Landscape character and beauty of the surrounding countryside • Adherence to the mitigation hierarchy • Net gain for biodiversity • Flexibility in design • Local amenity • The water environment and flood risk • The historic environment • Existing land use and green infrastructure • Public Rights of Ways **Design Principles and Parameters [EN010168/APP/7.4]** sets out the design principles and parameters by which the Scheme has been designed and the Environmental Impact Assessment has been undertaken. The design principles have informed the parameters which are secured by Requirement 5 in the **Draft DCO [EN010168/APP/3.1]**, and apply to the detailed design of the Scheme post consent.

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		xiv) For compliance with this please see Policy 61 below.
Core Policy 58: Ensuring the Conservation of the Historic Environment	Development should protect, conserve and where possible enhance the historic environment. Designated heritage assets and their settings will be conserved, and where appropriate enhanced in a manner appropriate to their significance, including: i. nationally significant archaeological remains ii. World Heritage Sites within and adjacent to Wiltshire iii. buildings and structures of special architectural or historic interest iv. the special character or appearance of conservation areas v. historic parks and gardens vi. important landscapes, including registered battlefields and townscapes. Distinctive elements of Wiltshire's historic environment, including non-designated heritage assets, which contribute to a sense of local character and identity will be conserved, and where possible enhanced. The potential contribution of these heritage assets towards wider social, cultural, economic and environmental benefits will also be utilised where this can be delivered in a sensitive and appropriate manner in accordance	Through sensitive design, the Applicant has taken care to avoid, reduce and mitigate impacts on heritage assets and their setting, in accordance with the mitigation hierarchy. Mitigation specific to each heritage asset is set out in **ES Volume 3, Appendix 12-8: Cultural Heritage Impact Assessment Tables [EN010168/APP/6.3]** and includes: • The removal of solar panels from fields close to heritage assets (such as close to Conservation Areas and various Listed Buildings including Bradfield Manor); • The inclusion of offsets between the Scheme's infrastructure and heritage assets to act as heritage buffers; • Enhanced screening of existing hedgerows between the Scheme and identified heritage assets, such as between the Scheme and Rodbourne and between the Scheme and various Listed Buildings such as Norton Manor; • Creation of new tree belts, for instance between the Scheme and Bradfield Manor Farmhouse and Surrendell Farmhouse; • Routing construction traffic along routes to minimise impacts on conservation areas and various Listed Buildings such as Westlands Farmhouse; and

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	with Core Policy 57 (Ensuring High Quality Design and Place Shaping). Heritage assets at risk will be monitored and development proposals that improve their condition will be encouraged. The advice of statutory and local consultees will be sought in consideration of such applications.	• Measures for in-situ preservation of archaeological assets. **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** concludes that there is no substantial harm to, or loss of, designated heritage assets as a result of the Scheme. The Heritage Statement at **ES Volume 3, Appendix 12-1: Heritage Statement [EN010168/APP/6.3]** identifies seven designated heritage assets where there is potential for *less than substantial harm* (including for instance, Bradfield Manor, Surrendell Farmhouse and Fosse Lodge) which is assessed at the lower end of the scale. However, these have been further assessed in **ES Volume 3, Appendix 12-8: Cultural Heritage Impact Assessment Tables [EN010168/APP/6.3]** and with implementation of embedded mitigation measures, no significant adverse effects have been identified. It is not anticipated that the Scheme will lead to substantial harm to the significance of any non-designated heritage assets. **ES Volume 3, Appendix 12-1: Heritage Statement [EN010168/APP/6.3]** identifies five non-designated heritage assets where there is potential for *less than substantial* harm (such as Townleaze Barn) which is assessed at the lower end of the scale. These have been further assessed the ES, as reported in **ES Volume 3, Appendix 12-8: Cultural Heritage Impact Assessment Tables [EN010168/APP/6.3]** and with implementation of

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		embedded mitigation measures, no significant effects have been identified.
Core Policy 61: Transport and New Development	New development should be located and designed to reduce the need to travel particularly by private car, and to encourage the use of sustainable transport alternatives. As part of a required transport assessment, the following must be demonstrated: i. That consideration has been given to the needs of all transport users, where relevant, according to the following hierarchy: a. Visually impaired and other disabled people b. Pedestrians c. Cyclists d. Public transport e. Goods vehicles f. Powered two-wheelers g. Private cars ii. That the proposal is capable of being served by safe access to the highway network. iii. That fit for purpose and safe loading/unloading facilities can be provided where these are required as part of the normal functioning of the development.	**ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** provides an assessment of the likely significant effects of the Scheme on transport and access. It concludes that following the implementation of embedded mitigation, no significant effects are anticipated for transport and access. Measures have been embedded into the design of the Scheme, including a travel plan incorporating options to enhance active, public and shared transport provision and accessibility. These measures are set out in the paragraphs below. The Scheme has been designed, as far as practicable, to avoid and reduce impacts and effects on transport and access through the process embedding measures into the design. An Outline Construction Worker Travel Plan (CWTP) has been prepared as part of the **Outline CTMP [EN010168/APP/7.22]** and is secured through a Requirement in the **Draft DCO [EN010168/APP/3.1]**. This includes measures for the provision of shuttle buses to transport construction workers to and from the Order Limits, and car sharing measures, to reduce dependency on private cars. The provision of 12.8km of new non-vehicular permissive paths on each of the Solar PV Sites. These permissive paths are shown on the **Works Plan [EN010168/APP/2.3]** as demarcated by Work No.10.

Policy	Detail	Scheme Compliance
	Where appropriate, contributions will be sought towards sustainable transport improvements, and travel plans will be required to encourage the use of sustainable transport alternatives and more sustainable freight movements.	These routes will provide pedestrians and horse riders improved accessibility to the countryside and improved connectivity to the wider PROW network. These permissive paths are to remain open up to 365 days per year throughout the proposed 60-year operational lifetime of the Scheme. Pedestrian access to properties will be maintained at all times. In terms of cycling infrastructure there is no cycling specific infrastructure within the Solar PV Sites. There are two cycling routes which cross the Study Area for the Cable Route Corridor, the National Cycle Network Route 403 and Section 14 of the Wiltshire Cycleway. It is not anticipated these will experience any significant effects. There will be no impact on local bus services, with pedestrian infrastructure maintained to provide access to local bus stops as set out in Section 13.7 of **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** Deliveries to Site by HGV will be coordinated through a booking system to avoid travel during the network peak hours where possible. Therefore, deliveries will be scheduled for between 09:30 and 16:30 where possible. Some deliveries may be required outside of these hours, if unavoidable. The following vehicle movements are anticipated during the construction phase, spread out around the different areas of the

Policy	Detail	Scheme Compliance
		Order Limits and the different access routes to the Order Limits: • Average HGV arrivals and departures per day: 48 (96 movements); • Peak HGV arrivals and departures per day: 74 (148 movements). As set out in the **Outline CTMP [EN010168/APP/7.22]**, a new emergency access has been provided to Lime Down D Solar PV Site during construction and operation, providing access to the 400 kV Substation and BESS from Hill Hayes Lane. On some sections of the Cable Route Corridor trenching will be required to crossroads. This will be managed through Traffic Management and diversions where available. Steel plates will be made available on site for emergencies or emergency vehicles. The **Outline CTMP [EN010168/APP/7.22]** sets out construction access arrangements, construction vehicle routing, construction vehicle trip generation, and the management/mitigation measures. It also summarises the requirements for vehicles to transport abnormal indivisible loads (AIL) (for elements such as transformers). It also provides a framework for the management of construction vehicle movements to and from the Scheme, to ensure that the effects of the temporary construction phase on the local highway network are minimised.

Policy	Detail	Scheme Compliance
		The Scheme has incorporated Highway Improvement Areas into its design which comprise various sections of existing highway within the administrative areas of Wiltshire Council and South Gloucestershire Council to facilitate safe access to the Solar PV Sites and Cable Route Corridor. Works within these areas comprise improvements to the existing highway, minor works to enable construction vehicle movements, and provision of visibility splays. In terms of loading/unloading facilities, Temporary construction compounds would be established within the Solar PV Sites (refer to **ES Volume 2, Figure 3-2: Key Construction Phase Features [EN010168/APP/6.2]**). Temporary compounds would also be located along the Cable Route Corridor (refer to **ES Volume 2, Figure 3-2: Key Construction Phase Features [EN010168/APP/6.2]**), along with laydown areas. Contractors and visitors will be advised that parking facilities will be provided on-site in advance of visiting the Order Limits and that they should not park on-street. It is anticipated that goods would be delivered by HGV to the construction compounds within the Solar PV Sites and then distributed to the point of need within the Order Limits using lighter vehicles (e.g. tractor and trailer) as required. Whilst each construction compound will be removed at the end of the construction phase, space will remain within each Solar PV Site on the access

Policy	Detail	Scheme Compliance
		tracks for such a vehicle to turn around to ensure that reversing will not occur onto the highway. **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** provides more detail on the embedded mitigation measures for the construction, operation and maintenance and decommissioning stage of the Scheme. These details are further set out in the **Outline CTMP [EN010168/APP/7.22]**, **Outline CEMP [EN010168/APP/7/12]**, **Outline OEMP [EN010168/APP/7.13]** and **Outline Decommissioning Strategy [EN010168/APP/7.14]** which will be secured through Requirements in the **Draft DCO [EN010168/APP/3.1]**.
Core Policy 62: Development Impacts on the Transport Network	Developments should provide appropriate mitigating measures to offset any adverse impacts on the transport network at both the construction and operational stages. Proposals for new development should not be accessed directly from the national primary route network outside built-up areas, unless an over-riding need can be demonstrated.	The Scheme has been designed, as far as practicable, to avoid and reduce impacts and effects on transport and access through the process embedding measures into the design. An **Outline CTMP [EN010168/APP/7.22]** has been prepared and will be secure by Requirement 15 in Schedule 2 of the **Draft DCO [EN010168/APP/7.22]**. The **Outline CTMP [EN010168/APP/7.22]** will be a framework for the management of construction vehicle movements to and from the Order Limits, to ensure that the effects of the temporary construction phase on the local highway network are minimised. The **Outline CTMP [EN010168/APP/7.22]** sets out construction access arrangements, construction vehicle routing, construction vehicle trip generation, and the

Policy	Detail	Scheme Compliance
		management/mitigation measures. It also summarises the requirements for vehicles to transport Abnormal Indivisible Load (for elements such as transformers). **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** outlines the embedded mitigation measures for the operational stage of the Scheme including (but not limited to): • Providing suitable points of access for operation and maintenance phase vehicles with turning areas; • The planting of landscaping and screening to conceal reflections from the Solar PV Panels as far as possible, which could affect drivers on the local highway network; and The Scheme has incorporated Highway Improvement Areas into its design which comprise various sections of existing highway within the administrative areas of Wiltshire Council and South Gloucestershire Council to facilitate access to the Solar PV Sites and Cable Route Corridor. Works within these areas comprise improvements to the existing highway, minor works to enable construction vehicle movements, and provision of visibility splays. There will be a total of 21 points of access for the Solar PV Sites for the construction and operational and maintenance phases. In addition, there will be 28 points of access along the Cable Route Corridor. As

Policy	Detail	Scheme Compliance
		reported in **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.1],** all have been assessed and designed to accommodate the relevant vehicles that will use them. During the construction phase, banksmen will be provided at the access points to ensure the safe movement of construction vehicles when accessing and exiting the Order Limits. Access to the Scheme is proposed from the primary road network for the following reasons: • The access to Lime Down E was included to avoid routing through roads in the vicinity of Rodbourne. • The access to Lime Down D was to avoid the use of the unsurfaced road to the east of Hullavington crossroads and to avoid the low bridge for AIL deliveries. • The access to Lime Down D will be temporary for construction. The appropriate design standard has been incorporated into the Scheme for these accesses.
Core Policy 67: Flood Risk	Development proposed in Flood Zones 2 and 3 as identified within the Strategic Flood Risk Assessment will need to refer to the Strategic Housing Land Availability Assessment when providing evidence to the local planning authority in order to apply the sequential test in line with the requirements of national policy and established best practice.	Whilst the Scheme is primarily located within Flood Zone 1, some areas are within Flood Zones 2 and 3. Therefore, the application is supported by site-specific FRAs at **ES Volume 3, Appendix 11-1: FRA and Drainage Strategy [EN010168/APP/6.3]**.

Policy	Detail	Scheme Compliance
	All new development will include measures to reduce the rate of rainwater run-off and improve rainwater infiltration to soil and ground (sustainable urban drainage) unless site or environmental conditions make these measures unsuitable.	The Sequential Test has been applied and satisfied as part of site selection. This is described in **Annex C: Sequential and Exception Test** to the Planning Statement and demonstrates that priority has been given to areas of lower flood risk in the site selection assessment, with areas in Flood Zones 2 and 3 initially excluded from the search for alternative sites. None of the alternative sites at lower risk of flooding were assessed to be suitable for the Scheme and in line with national policy the exception test was applied and therefore further areas were explored within Flood Zones 2 and 3. The Scheme has been designed so that areas of more vulnerable infrastructure have been sited in areas of lower flood risk. **Annex C: 'Sequential and Exception Test' of the Planning Statement [EN010168/APP/7.2]** also applies the Exception Test and demonstrates that the Scheme would provide wider sustainability benefits to the community which would outweigh the flood risk and that the Scheme will be safe for its lifetime taking account of vulnerability of its users, without increasing flood risk elsewhere, and where possible, will reduce flood risk overall. Accordingly, the Exception Test is met in line with relevant policy. The Flood Risk Assessment (FRA) and Drainage Strategy included in **ES Volume 3, Appendices 11-1 to 11-9 [EN010168/APP/6.3]** concludes that flood risk from all sources to the Scheme is negligible to low.

Policy	Detail	Scheme Compliance
		Embedded mitigation has been incorporated into the Scheme design to increase its flood resilience, such as siting critical infrastructure in Flood Zone 1, where there is less risk of flooding, and incorporating a minimum 8 m buffer between infrastructure and all Main Rivers and Ordinary Watercourses. As set out in **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** the Scheme is not anticipated to increase the risk of flooding elsewhere, as: • The design of the solar PV panels and mounting structures will allow flood water to flow freely underneath; • The permanent impermeable areas, such as at the substations, conversion units and BESS Area are negligible in comparison to the total land area of the Site (63,715 m2 for the BESS Area). With embedded mitigation, these impermeable areas should not increase flood risk elsewhere; • The Interconnecting Cables and Grid Connection Cables will be underground once constructed, and therefore will not increase the risk of flooding; • Embedded mitigation measures to manage surface water runoff from the Scheme will ensure there is no increase in surface water runoff rates; and

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		• Temporary increases in the risk of flooding from the Scheme during construction have been addressed by embedded and additional mitigation. SuDS have been incorporated into the Scheme to manage surface water flows and an overview of the proposed SuDS features and their maintenance is provided in the Flood Risk Assessment and Drainage Strategy at **ES Volume 3, Appendices 11-1 to 11-9 [EN010168/APP/6.3]**.
Core Policy 68: Water Resources	Development must not prejudice the delivery of the actions and targets of the relevant River Basin or Catchment Management Plan, and should contribute towards their delivery where possible. Non-residential development will be required to incorporate water efficiency measures. Developers will be expected to submit details of how water efficiency has been taken into account during the design of proposals. Development proposals within a Source Protection Zone, Safeguard Zone or Water Protection Zone must assess any risk to groundwater resources and groundwater quality and demonstrate that these would be protected throughout the construction and operational phases of development.	**ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** concludes that there are no residual effects in relation to the Scheme during construction, operation and decommissioning, therefore delivery of the Scheme would not prejudice the delivery of the objectives included in the Severn River Basin Management Plan or the objectives for the Avon Bristol and Somerset North Management Catchment. The **Outline Water Resources Strategy [EN010168/APP/7.25]** sets out the quantities of water required for the Scheme during construction and operation and where the Applicant is likely to resource these demands. The central part of the BESS site associated with the Scheme lies within a Drinking Water Safeguard Zone.

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		ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1] assesses the potential impacts on water quality from construction and operational surface water runoff. Drainage from the BESS Area will be managed using lined, permeable SuDS with pollution controls including filter media and self-actuating valves to contain spills and firewater. Runoff from panelled areas and the cable corridor route will consist of direct rainfall falling onto clean surfaces. These areas do not contain any pollutant sources and do not require treatment. Runoff will either infiltrate or discharge at greenfield rates, as confirmed in **ES Volume 3, Appendix 11-1: FRA and Drainage Strategy [EN010168/APP/6.3]**. Measures have been informed by consultation with the EA and LLFA. No likely significant effects on water quality are anticipated.

Wiltshire Council Saved Policies (2011)

Policy	Detail	Scheme Compliance
NE12: Woodland	The creation, conservation, enhancement and positive management of woodlands across the district will be supported. In particular, areas of ancient and semi-natural woodland should be protected. The retention of	The Scheme would not have any impact on the locations listed out from i. to iv. in this policy. As set out in Section 8.3 of the **Planning Statement [EN010168/APP/7.2]** the Scheme layout has been carefully designed to avoid veteran trees and

Policy	Detail	Scheme Compliance
	the visual amenity and nature conservation value will be sought in particular at the following: i. Bird's Marsh Wood, Chippenham ii. Vincient's Wood, Chippenham iii. Pockeredge Drive Wood, Corsham iv. Woodland within Braydon Forest.	embedded mitigation has been included such as tree buffer zones to avoid soil disturbance, micrositing to avoid root and canopy impacts, and demarcation fencing as set out in **the Outline CEMP [EN010168/APP/7.12]**. This will be secured by Requirement 13 in Schedule 2 of the **Draft DCO [EN010168/APP/3.1].** No direct loss of category A trees or veteran trees will occur within the Solar PV Sites, with likely removals limited to category B and C trees/tree groups. Some tree removals may be required in the Cable Route Corridor, but this will preferentially target trees of lower quality and no ancient or veteran trees will be removed from the Cable Route Corridor. Some likely canopy/root impacts are highlighted in **ES Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1]**. However, micro-siting will be employed to avoid the removal or occurrence of root or canopy impacts to veteran trees and high-quality category A trees within the Cable Route Corridor. Temporary construction compounds will be sited outside of the canopy spreads and RPAs of adjacent trees and woodlands. Overall, neutral and non-significant residual impacts are anticipated for all veteran trees and ancient woodlands at the Solar PV Sites provided that embedded mitigation measures are followed. Additionally, for all trees within the Cable Route Corridor, no significant residual effects have been identified for the operation stage of the Scheme.

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		Further, significant tree and woodland planting is proposed within the Order Limits as outlined in the **Outline LEMP [EN010168/APP/7.18]** which will be secured by Requirement 7 in Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**. These measures which will result in the creation of 11.37 ha of new native broadleaved woodland. Locations for planting have been directed by the need for landscaping and visual impact mitigation, but opportunities have also been taken to connect habitat parcels. Once established, this level of woodland planting will result in a significant beneficial effect on the extent of woodland within the Order Limits, which would, by extension, contribute to the connectivity of woodland stands and Green Infrastructure across the local landscape.
NE14: Trees and the Control of New Development	Permission will not be granted for proposals that would result, or be likely to result, in the loss of trees, hedges, lakes/ponds or other important landscape or ecological features that could be successfully and appropriately incorporated into the design of a development. Planning conditions will be imposed and Tree Preservation Orders made, for safeguarding single and small groups of trees in the interests of public amenity.	**ES Volume 3, Appendix 10-1: Arboricultural Impact Assessment and Outline Arboricultural Method Statement [EN010168/APP/6.3]** identifies that there are no ancient woodland or ancient trees, and 51 veteran trees within the Order Limits. Six areas of ancient woodland lie adjacent to the Order Limits. Low impacts have been identified to trees on the edge of one Ancient Woodland, North Bincombe Wood. A 242m section of internal access track is proposed within the 15m wide Ancient Woodland Buffer Zone of North Bincombe Wood in Lime Down E. No tree removal is anticipated to be required and as only a very small number of trees on the edges of the Ancient Woodland will be potentially impacted, and as these trees are confirmed to not be veteran trees, no

Policy	Detail	Scheme Compliance
		significant impacts are anticipated. All other proposed Scheme elements within the Sites are located beyond the 15 m wide Ancient Woodland Buffer Zones. Dust and sediment controls will be in place for relevant works near ancient woodland as set out in the **Outline CEMP [EN010168/APP/7.12]** secured through Requirement 13 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**. Significant tree and woodland planting proposed within the Solar PV Sites as outlined in the **Outline LEMP [EN010168/APP/7.18]**, will result in the creation of 11.37 ha of new native broadleaved woodland within the Order Limits. This will be secured by Requirement 7 in Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**.
NE18: Noise and Pollution	Development will only be permitted where it would not generate, or itself be subject to, harm upon public health or cause pollution to the environment by the emission of excessive noise, light intrusion, smoke, fumes, other forms of air pollution, heat, radiation, effluent or vibration.	As detailed in the **Design Approach Document [EN010168/APP/7.3]** the Scheme has adopted design principles including a design principle to ensure the Scheme will be carefully designed to minimise where practicable impacts on amenity from air quality, traffic and noise effects and safeguard the health and safety of local residents by securing suitable control measures during construction, operation and maintenance and decommissioning of the Scheme. **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 and **ES Volume 1, Chapter 14: Noise and**

Policy	Detail	Scheme Compliance
		Vibration [EN010168/APP/6.1] provides an assessment of noise and vibration impacts. **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** provides as assessment of the likely significant impacts of the Scheme on noise and vibration. It concludes no significant residual effects are anticipated on any noise sensitive receptors following mitigation set out in the **Outline CEMP [EN010168/APP/7.12]**, **Outline OEMP [EN010168/APP/7.13]**, and **Outline Decommissioning Strategy [EN010168/APP/7.14]**. These measures will be secured by Requirements in Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**. Mitigation measures have been identified that respect the tranquillity of the area, which was identified in Section 14.7 of **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** to represent a typical quiet rural location. The Scheme has been designed as far as practicable to avoid and reduce impacts and effects on noise with Section 14.9 of the chapter setting out embedded mitigations measures, which represent Best Practical Measures. These are secured within the **Outline CEMP [EN010168/APP/7.12]** for the Construction phase and the **Outline Decommissioning Strategy [EN010168/APP/7.14]** for the Decommissioning phase, and the development of detailed plans is to be secured by requirements 13 and 20 under Schedule 2 of the **Draft DCO**

Policy	Detail	Scheme Compliance
		[EN010168/APP/3.1]. Additional measures, set out in Section 14.11 of the chapter, in the form of a bespoke communication strategy to inform occupants of the timings of noisy works, will be implemented for the one receptor which may experience temporary elevated noise levels, and as set out in Table 14-24 Summary of Significant Residual Effects (Construction and Decommissioning) of **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]**, no significant residual effect remains following the implementation of these measure and no residual significant effects on noise and vibration are predicted during any stage of the Scheme. As stated in **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]**, lighting is not required within the Solar Arrays for the operational phase. Motion sensing security lighting will be provided within substations and within the BESS to be used only for maintenance and security purposes. Furthermore: • Standard good practice measures would be employed to minimise light spill, including glare during construction, operation and decommissioning. • There will be no lighting on perimeter fencing. Temporary site lighting during construction will be required to enable safe working during construction and decommissioning during hours of darkness and will be designed as far as reasonably practicable to

Policy	Detail	Scheme Compliance
		minimise potential for light spillage outside the Sites and Cable Route Corridor, particularly towards houses, traffic and ecological habitats. Mobile lighting towers with a power output of 8 kilo volt-amperes (kVA) would be used for construction work, along with lighting at the construction compounds whilst construction is underway. Measures to control lighting are set out in the **Outline CEMP [EN010168/APP/7.12]**, including measures to minimise lighting to that required for safe site operations, use of directional fittings to avoid light spill, and directing lighting into the Order Limits rather than towards the boundaries. Following the implementation of mitigation measures detailed within the **Outline CEMP [EN010168/APP/7.12]**, the **Outline CTMP [EN010168/APP/7.22]**, the **Outline BSMP [EN010168/APP/7.21]**, the **OEMP [EN010168/APP/7.13]**, and the **Outline Decommissioning Strategy [EN010168/APP/7.14]**, there are no significant effects anticipated from the construction, operation and decommissioning of the Scheme on amenity. These measures will be secured by Requirements in Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**.
T5: Safeguarding	Development affecting public rights of way, cycle and pedestrian routes will only be permitted where satisfactory provision, in terms of safety, attractiveness and convenience, is made to retain or divert the existing	It is anticipated that PRoW which cross the Order Limits will generally remain open during the construction, operation and maintenance and decommissioning phases of the Scheme. During construction PROW will be managed in accordance

Policy	Detail	Scheme Compliance
	or proposed route. Land for the following transport proposals is safeguarded on the proposals map: Chippenham Bus Station Corsham Railway Station Cotswold Water Park Eastern Spine Road Dualling of A350, North of Chippenham Frogwell to Bumpers Farm Bus only link Local Transport Plan Cycle Network Plans Pockeredge Farm, Peel Circus, Local Distributor Link Road Purton Railway Station Spring Quarry Access Road Swindon and Cricklade Railway Swindon North Distributor Road Thames and Severn Canal Wilts and Berks Canal Wootton Bassett Railway Station	with the measures in the **Outline Public Rights of Way and Permissive Paths Management Plan [EN010168/APP/7.17]** to ensure user safety, for instance at construction vehicle crossings. The following temporary closures/diversions are anticipated during construction: • Diversion of PRoW MALW54 will be temporarily diverted for the duration of the construction phase for health and safety reasons and to avoid conflict with construction vehicles accessing Lime Down E, at Access 18. The diversion will run adjacent to the existing alignment. Once construction is complete, the PRoW will return to its existing alignment; • PRoW GRIT20 (located in the Cable Route Corridor) will be temporarily diverted for the duration of the construction phase for health and safety reasons and to avoid conflict with construction vehicle access at Access 102. The diversion will run adjacent to the construction compound to the north and east. Once construction is complete, the PRoW will return to its existing alignment. • Temporary closures may also be required during construction for installation of Grid Connection Cables, but this will likely last not more than one day (or overnight). Where temporary closures are deemed to be necessary, these will be prioritised for overnight

Policy	Detail	Scheme Compliance
		work (when there are unlikely to be PRoW users), and sufficient notice will be given to users and the local highway authority so far as practicable. The **Planning Statement [EN010168/APP/7.2]** sets out how the Scheme design includes the creation of 12.8km of new non-vehicular permissive paths on each of the Solar PV Sites for the lifetime of the Scheme to provide pedestrians and horse and bicycle riders improved accessibility to the countryside and improved connectivity of the wider PRoW network. The location of the proposed permissive paths is outlined on the **Works Plan [EN010168/APP.2.3]** as Work No.10B**.** The design and implementation of the proposed permissive paths is set out in the **Outline Public Rights of Way and Permissive Paths Management Plan [EN010168/APP/7.17]** and their creation and maintenance are secured through Requirements in Schedule 2 to **the Draft DCO [EN010168/APP/3.1]**. The Scheme will have no impact on, or interaction with, the land safeguarded for the transport proposals set out in Policy T5.

South Gloucestershire Local Plan: Core Strategy (December 2013)

Policy	Detail	Scheme Compliance
CS1: High Quality Design	Development will only be permitted where the highest possible standards of design and site planning are achieved. Information submitted with an application should be proportionate to the scale, significance and impact of the proposal. Development proposals will be required to demonstrate that: 1. Siting, form, scale, height, massing, detailing, colour and materials, are informed by, respect and enhance the character, distinctiveness and amenity of both the site and its context; and 2. density and overall layout is well integrated with existing adjacent development and connected to the wider network of foot, cycle and public transport links; and 3. existing features of landscape, nature conservation, heritage or amenity value and public rights of way, are safeguarded and enhanced through incorporation into development; and 4. if the proposed scheme is of a sufficient scale or significance, explain how the development contributes towards the vision and strategic objectives of the locality and (as appropriate) how account has been taken of: • community consultation	The **Design Approach Document [EN010168/APP/7.3]** sets out the Applicant's design vision for the Scheme, as well as its evolution since inception to DCO Application submission. It clearly sets out the design decisions taken at each step of the Scheme's development, and the rationale for these decisions, as well as the mechanisms by which good design will be secured post consent. It explains how the project specific Design Principles have been embedded into Scheme and its design iterations to ensure that the design of the Scheme is sensitive to place (particularly in the context of the Cotswolds National Landscape), has minimal impacts on heritage assets, represents an efficient use of natural resources and has demonstrated good aesthetic appearance as far as possible, in accordance with this policy. Further details of the design evolution for the Scheme, together with a discussion on alternative sites, design layouts and technologies, can be found in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]**. In addition to the project specific design principles, the design evolution of the Scheme has also been influenced by feedback received during Non-statutory and Statutory Consultation, technical feedback and through further surveys, desk-based analysis and environmental assessment, to ensure that the design

Policy	Detail	Scheme Compliance
	• Green Infrastructure objectives • the South Gloucestershire Landscape Character Assessment (2005) • the Cotswolds AONB Management Plan • endorsed parish plans, town centre strategies and village design statements • adopted Conservation Area Appraisals, Management Plans, and • other design guidance and/or Area Action Plans that may be adopted as SPD from time to time; and in order to assist in meeting climate change and health and well-being objectives, proposals will be required in particular to: 5. enhance existing or develop new public realm (and associated management & maintenance regimes) that enables people to gain access safely and conveniently, particularly to serve the needs of: • pedestrians and cyclists • children, the disabled and older people, and • with regard to residential and mixed use schemes, provide opportunities for social interaction and play; and 6. ensure soft landscape proposals form an integral part of the design for the site and seek to make a net contribution to tree cover in the	of the Scheme is sensitive to its environment and the views of those who have an interest in the Scheme. The **Design Approach Document [EN010168/APP/7.3]** sets out how good design measures are secured for the Scheme, including through Requirements in Schedule 2 of the **Draft DCO [EN010168/APP/3.1]** the **Works Plan [EN010168/APP/2.2],** and the various management plans including the **Outline LEMP [EN010168/APP/7.18]**, and the **Outline Ecological Protection and Mitigation Strategy [EN010168/APP/7.19]**. The Scheme within South Gloucestershire is limited to two Highway Improvement Areas, which comprise sections of existing highway within South Gloucestershire. Whilst the Solar PV Sites, cable corridor and associated infrastructure is located outside of the local authority boundary for South Gloucestershire, the highway improvements to facilitate the Scheme are within the South Gloucestershire boundary and include: • A46 Bath Road/Acton Turville Road Junction, Tormarton – Minor temporary road widening at the junction and temporary removal of keep left bollards on traffic island (it is assumed that the traffic island can be overrun and will remain in place).

Policy	Detail	Scheme Compliance
	locality (particularly in urban areas), and prioritise biodiversity objectives and local food cultivation where possible; and 7. where the scale, location and/or significance of the development proposal warrants it, embed public art within the public realm or in a location where it can be viewed from public areas; and 8. ensure the design, orientation and location of buildings, roof pitches, windows, habitable rooms, lighting and soft landscaping help to achieve energy conservation, the protection of environmental resources and assist the appropriate siting of renewable and/or low carbon energy installations and infrastructure. Schemes that can demonstrate that they will outperform statutory minima, such as the building regulations, in terms of sustainable construction, at the time of construction commencement, will be considered a primary indicator of good design. All new developments will be required to meet the building regulations current at the time of full planning or reserved matters approval. Until the 'Zero Carbon' building regulations are implemented major residential (10 or more dwellings) and mixed use schemes will be encouraged to achieve full compliance with each Code level (currently level 3) or above, and/or Building Research Establishment Environmental Assessment Method (BREEAM) 'very good' or other equivalent standard; and	• A46 Bath Road/B4040 Junction, Old Sodbury – Temporary minor road widening at the junction, temporary removal of give-way and no-entry signage, and trimming of existing hedge/tree branches. Works within the Highway Improvement Areas comprise modifications to the existing highway such as improvements to road edge where it is deteriorated, minor works to enable construction vehicle movements such as provision of passing places within the existing highway boundary, traffic management measures and provision of visibility splays. To safely accommodate abnormal load (AIL) vehicle movements along construction routes, Highway Improvement Areas in the wider area are also required. These comprise minor, temporary modifications at six junctions and include the removal of street furniture, widening of junctions, and vegetation removal. These are listed below and shown in **ES Volume 2, Figure 2-4: Public Right of Way (PRoW) and Highways [EN010168/APP/6.2]**. • A350 /Corsham Road junction; • A365 /B3109 junction (Box Fiveways); • A46 Bath Road /Acton Turville Road junction; • A46 Bath Road /B4040 junction; • B4093 /The Gibb crossroad; and • A429 /B4014 roundabout.

Policy	Detail	Scheme Compliance
	9. take account of personal safety, security and crime prevention; and 10. ensure sufficient space provision is designed in for the sorting and storage of recyclable waste materials in a convenient location, the composting of household waste (where practicable), and the collection of these and other waste materials and, in larger development schemes, for recycling on site; and 11. take account of the South Gloucestershire Strategic Flood Risk Assessments and provide, where appropriate, measures to manage flood risk and prepare surface water management plans. At the detailed planning application stage, residential development of more than 10 dwellings, will be expected to demonstrate how Building for Life (BFL12) criteria (or any nationally recognised methodology that may supersede Building for Life) will be achieved.	Highway improvements associated with AIL movements will be temporary, with the highway returned to its previous condition once AIL deliveries have been made.
CS3: Renewable and Low Carbon energy Generation	Proposals for the generation of energy from renewable or low carbon sources, provided that the installation would not cause significant demonstrable harm to residential amenity, individually or cumulatively, will be supported. In assessing proposals significant weight will be given to:	South Gloucestershire Council declared a climate emergency in July 2019 and the Scheme that represents a significant and commercially rational step forward in the fight against the global climate emergency. The Scheme comprises non-permanent solar PV energy generation with an operational life of 60 years. Activities during that time can be categorised as:

Policy	Detail	Scheme Compliance
	1. the wider environmental benefits associated with increased production of energy from renewable sources 2. proposals that enjoy significant community support and generate an income for community infrastructure purposes by selling heat or electricity to the National Grid 3. the time limited, non-permanent nature of some types of installations; and 4. the need for secure and reliable energy generation capacity, job creation opportunities and local economic benefits. Renewable or low carbon energy installations will not be supported in areas covered by national designations and areas of local landscape value unless they do not individually or cumulatively compromise the objectives of the designations especially with regard to landscape character, visual impact and residential amenity. Developments will also be required to meet objectives of Policy CS1 (High Quality Design), as far as engineering requirements permit.	general operational and maintenance activities, and programme of replacement activities. The **Statement of Need [EN010168/APP/7.1]** sets out that the Scheme, if consented, will deliver large amounts of cheap, secure, and low carbon electricity which will help the UK achieve its Sixth Carbon Budget commitments and stay on track to achieve net zero by 2050. The **Statement of Need [EN010168/APP/7.1]** explains that the Scheme produces urgently needed low carbon solar generation and, if consented, will contribute to the achievement of government objectives to deliver sustainable development that enables decarbonisation. By doing so, the Scheme will provide energy that is secure, low carbon and low-cost. Furthermore, the **Statement of Need [EN010168/APP/7.1]** sets out that the Scheme is required to ensure that the UK remains on track to meet its legally binding carbon emissions reduction targets, including the Sixth Carbon Budget and Nationally Determined Contribution. **Wider benefits** The substantial benefits of the Scheme are set out in the **Planning Statement [EN010168/APP/7.2]** and include the contribution the Scheme makes to decarbonisation, the demand for electricity and security of supply, renewable energy generation, ecological and landscape enhancements, biodiversity

Policy	Detail	Scheme Compliance
		net gain, the provision of 12.8 km of permissive paths, employment generation, economic benefits and skills training, which are further explained below. The Scheme would result in GHG emissions savings over its lifetime as a result of the low carbon renewable electricity that will be generated during the operational phase. This far outweighs the GHGs and impacts on climate change that are anticipated in the construction, operation and decommissioning of the Scheme. **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** confirms that over the 60 year lifespan of the Scheme, the total energy generated would be around 23.54 TWh and 24.26 TWh for tracker and fixed panels respectively. Accordingly, whilst the Scheme's construction does result in increased GHG emissions, the conclusion of the assessment is that, overall, the Scheme is likely to result in significant and beneficial residual effects for the whole Scheme lifecycle due to the clean energy produced by the Scheme, which will provide a net reduction in GHG emissions compared to a scenario without the Scheme. Over the Scheme's lifespan, which is estimated to be 60 years for the purpose of this assessment, it is estimated the Scheme will result in a net saving of 218,611 tCO2e if tracker panels are used or 253,839 tCO2e for fixed panels in comparison with a scenario whereby the Scheme does not come into effect and emissions from the grid in the baseline year of operation were used.

Policy	Detail	Scheme Compliance
		The Scheme will deliver, as a minimum, 10% BNG, which is secured via Requirement 9 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].** The **BNG Assessment Report [EN010168/APP/7.8]** indicates that BNG in excess of 10% will be achieved, with a total net gain of 63.80% for area habitat units, 19.35% for hedgerow units and 25.30% for watercourse units in relation to the Solar PV Sites. The total net gain for the whole Scheme (i.e. Solar PV Sites and Cable Route Corridor combined) is 34.75% for area habitat units, 12.31% for hedgerow units and 20.08% for watercourse units, as set out in the **BNG Assessment Report [EN010168/APP/7.8]**. The Scheme will enhance and improve connectivity in line with NPS EN-1 and the project design principles through the creation of 12.8 km of new permissive paths, which will be open up to 365 days per calendar year throughout the proposed 60-year operational lifetime of the Scheme. The Scheme is anticipated to create 268 Full Time Equivalent (FTE) per annum with the estimated on-site construction workforce expected to peak at approximately 692 total employees (gross direct employment) during the construction phase. During

Policy	Detail	Scheme Compliance
		operation, 15 permanent jobs would be generated. In a peak replacement scenario, 125 FTE are required and in the decommissioning phase up to a gross of 214 FTE employees per annum are estimated. Job creation provides employment and skills benefits and further enhancement measures are proposed and set out in the **Outline SSCEP [EN010168/APP/7.20]** to enhance local education through promoting apprenticeship and training schemes, to promote local recruitment and procurement, and to support agricultural workers in moving to diversified farming practises (such as sheep grazing) which can continue alongside operation of the Scheme. This will be secured by Requirement 18 of Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**. In addition to job creation and skills training, the Gross Value Added (GVA) from construction of the Scheme is estimated to contribute £25.9 million per annum to the local area and a further £7.95 million per annum nationally.
CS4a: Presumption in Favour of Sustainable Development	There is a presumption in favour of sustainable development. When considering proposals for sustainable development the Council will take a positive approach. It will work pre-actively with applicants to find solutions so that sustainable development can be approved wherever possible.	The Scheme supports sustainable development by helping to deliver secure and low-carbon electricity. The **Planning Statement [EN010168/APP/7.2]** and **Annex A and B National and Local Policy Accordance Tables** of the **Planning Statement [EN010168/APP/7.2]** cover compliance with the relevant planning policies.

Policy	Detail	Scheme Compliance
	Planning applications that accord with the policies in this Plan will be approved without delay unless material considerations indicate otherwise. Where there are no policies relevant to the application, or relevant policies are out of date at the time of making the decision, then the Council will grant permission unless material considerations indicate otherwise. Account will be taken of whether: 1. Any adverse impacts of granting permission significantly and demonstrably outweigh the benefits when assessed against the policies in the National Planning Policy Framework and other policies in the Council's Local Plan, neighbourhood development plans, supporting supplementary planning documents and any emerging policy as it may be relevant. 2. Specific policies in the National Planning Policy Framework, other policies in the Council's Local Plan neighbourhood development plans, supporting supplementary planning documents and any emerging policy as it may relevant, indicate that development should be restricted.	
CS7: Strategic Transport Infrastructure	Priority will be given to the implementation of strategic infrastructure proposals that reduce congestion and improve accessibility by means other than the private car. In particular, the Council will work with its partners to deliver within the plan period the following key projects: 1. Completion of the Greater Bristol Bus Network	No adverse impacts of the Scheme on traffic and transport are identified within South Gloucestershire, as set out in **Chapter 13: Transport and Access [EN010168/APP/6.1]**. Where the Scheme's construction routes pass through sections of road that are considered narrow and

Policy	Detail	Scheme Compliance
	2. The construction of a Rapid Transit network to serve the communities of the North & East Bristol Fringes, including: • North Fringe to Hengrove (South Bristol) Package, and its components • Rapid Transit link from Hengrove to North Bristol Fringe • The Stoke Gifford Transport Link • Rapid Transit link from North Fringe to Emersons Green • Rapid Transit link from Ashton Vale to Emersons Green (Phase 2 - Temple Meads to Emersons Green. 3. Improvements to rail services, including: • electrification of the Great Western Main Line and associated improvements at Bristol Parkway station • the Greater Bristol Metro Project • re-introduction of passenger services on the Hallen Line/ Henbury Loop (subject to a satisfactory business case). 4. The Cribbs/Patchway New Neighbourhoods Package 5. The East of Harry Stoke New Neighbourhood Package 6. The Yate/Chipping Sodbury Package 7. The Rural Package 8. The Ring Road Package.	require widening, these have been adopted into the design as 'Highway Improvement Areas' which will ensure that sufficient passing room is present along the routes or traffic management is implemented to ensure the safe movement of construction vehicles. As set out in Section 13.7 of **ES Volume 3 Chapter 13: Transport and Access [EN010168/APP/6.1]**, the Highway Improvement Areas comprise sections of existing highway within the administrative areas of Wiltshire Council and South Gloucestershire Council to facilitate access to the Solar PV Sites and Cable Route Corridor. Further details on the Highway Improvement Areas are set out in **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]**. All construction routes can accommodate construction vehicle movements, with Highway Improvement Areas in place. The Scheme and implementation of these Highways Improvement Areas will not be prejudicial to the Council's strategy of developing the schemes referred to, or other strategic transport measures that may emerge through the Joint Local Transport Plan.

Policy	Detail	Scheme Compliance
	The Council will also require, the following, key infrastructure elements to be delivered as part of major development schemes: 9. Romney Avenue Bus Link (from Lockleaze through the Cheswick Village development site to the Cheswick Village Bus Link) 10. New Transport Interchange at UWE 11. Emersons Green East Multi-Modal Interchange and Rosary Roundabout improvements 12. New Junction onto the A4174 between Coldharbour Lane and the M32 (Junction 1) and access road to SGLP site 13 (Harry Stoke). **SAFEGUARDING LAND** Development will not be permitted where it is prejudicial to the Council's strategy of developing the schemes set out above, or other strategic transport measures that may emerge through the Joint Local Transport Plan. Land to be safeguarded will be identified in the Policies, Sites and Places Development Plan Document, Area Action Plans or other Development Plan Documents, as appropriate. Rail track beds and associated land will be safeguarded for their continuing use or reuse for public transport or rail freight, or foot and cycleways. Details of delivery agencies, timescales and funding mechanisms are set out in the Infrastructure Delivery Plan.	

Policy	Detail	Scheme Compliance
	The Council will also continue to work with schools, other educational establishments and major employers, in particular, to develop and promote Travel Plans.	
CS36: Proposals for Major Infrastructure Projects	In its role either as determining authority for associated development, or as consultee for applications to other bodies, and within the provisions of national policy, the Council will, taking into consideration the nature, scale, extent and potential impact of any development proposals coming forward, seek to ensure that development makes a positive contribution to the implementation of its vision, strategic objectives and strategy for development as set out in Chapter 4 and where appropriate other relevant local plans and supporting documents. The Council will therefore seek compliance, as appropriate or relevant, with the following: 1. the development and its associated / ancillary infrastructure, including any proposals for accommodation, education and training, employment, supply chain, transport, community, environmental and green infrastructure contribute to an overall balance of positive outcomes for local communities and the environment; and 2. provision of an assessment of how the consideration of alternatives has informed the proposals; and	Section 5.3 of the **Planning Statement [EN010168/APP/7.2]** sets out the substantial benefits the Scheme (of which the highways improvements form part), including employment, skills training and economic benefits. These are also set out in further detail in **ES Volume 1, Chapter 16: Socio-economics, Tourism and Recreation [EN010168/APP/6.1]**. **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** and the **Design Approach Document [EN010168/APP/6.1]** set out the assessment of how the consideration of alternatives informed the design of the Scheme. **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3]** also sets out the factors that were considered when determining a suitable site for the Scheme. The **ES [EN0101068/APP/6.1]** and its supporting **Figures [EN010168/APP/6.2]** and **Appendices [EN010168/APP/6.3]** provide a comprehensive assessment of the environmental, social, transport and economic impacts whether positive, negative or

Policy	Detail	Scheme Compliance
	3. provision of a comprehensive assessment of environmental, social, transport and economic impacts (positive, negative and cumulative) of the proposal during the construction, operation and where necessary, the decommissioning and restoration stages, and the delivery of measures where appropriate to avoid, minimise, mitigate and/ or compensate for harm caused; and 4. provision of contributions to the Local Authority or other appropriate and agreed organisation to offset any adverse impacts and harm caused by the project through effective engagement with local communities and the Council at the pre-application stage. The objective will be to identify measures, projects and services to enhance the long term well-being and sustainability of the communities affected; and 5. in recognition of any burden and disturbance borne by the community in hosting a major national or regional infrastructure project, the Council may require appropriate packages of community benefits to be provided by the developer to offset and compensate the community for the burden imposed by hosting the project; and 6. local economic and community benefits are where feasible maximised, through agreement of strategies for procurement, employment, education, training and recruitment with the Council at an early stage of project development; and	cumulative, of the Scheme during the construction, operation and maintenance, and decommissioning. The Applicant has undertaken consultation within South Gloucestershire with the Council, Stakeholders and the local community as set out in the **Consultation Report [EN010168/APP/5.1]**. The Scheme meets the requirements of The Conservation of Habitats and Species Regulations 2017as set out in the **Habitat Regulations Assessment Report [EN010168/APP/7.10]**. The Highways Improvement Areas will not have an impact on any nature conservation interests in South Gloucestershire. This is because works in the Highway Improvement Areas will be highly localised and generally contained within the existing highways boundary. The Zone of Influence for the Highway Improvement Areas is limited to the Highway Improvement Areas themselves (i.e. less than 1 m beyond). The Scheme proposes flood risk mitigation measures as set out in **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** and **Chapter 11: Flood Risk, Hydrology and Drainage [EN010168/APP/6.1]**. As outlined in Section 11.9 of **Chapter 11: Flood Risk, Hydrology and Drainage [EN010168/APP/6.1]** these include but are not limited to, locating associated electrical infrastructure in areas of low probability of

Policy	Detail	Scheme Compliance
	7. meeting the requirements of the legislative provisions of the Habitats Regulations 2010; and 8. the provision of flood protection measures to manage flood risk and, where feasible, deliver improvements in the locality. The provision of an assessment of anticipated impacts of the proposal on the surrounding marine and terrestrial environment and delivery of measures to manage and minimise any harm caused. In order to have sufficient information to be able to assess the effects of the proposals, the Council may request the preparation of management or delivery plans identifying the measures to be taken to maximise benefits and to mitigate and/or compensate for impacts where this is justified by national or local policy. These plans should identify the timetables for delivery and the systems and resources that will be used to implement the proposed measures.	flooding; flexibility for tracker or fixed Solar PV Panels; and the use of SuDS or similar passive drainage features appropriate to the local condition to manage runoff from equipment and access tracks. Following the implementation of embedded mitigation **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** concludes, in addition to the and the measures described in the **Outline CEMP [EN010168/APP/7.12]** and **Outline Decommissioning Strategy [EN010168/APP/7.14]**, no significant residual effects are anticipated. These will be secured by Requirements 13 and 20 of Schedule 2 of the **Draft DCO [EN010168/APP/3.1].** The assessments have included the Highways Improvement Areas (as set out in Section 11.5 of **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**). Mitigation measures including the Highway Improvement Areas are set out in the **Outline CEMP [EN010168/APP/7.12]** and traffic management measures are set out in the **Outline CTMP [EN010168/APP/7.22]**. These will be secured by Requirements of Schedule 2 of the **Draft DCO [EN010168/APP/3.1].**

South Gloucestershire Local Plan: Policies, Sites and Places Plan (2017)

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PSP8: Residential Amenity	Development proposal(s) will be acceptable provided that they do not create unacceptable living conditions or have an unacceptable impact on the residential amenity of occupiers of the development or of nearby properties. Unacceptable impacts could result from (but are not restricted to): a. loss of privacy and overlooking; b. overbearing and dominant impact; c. loss of light (daylight/sunlight); d. noise or disturbance; and e. odours, fumes or vibration.	The Highway Improvement Areas will not result in any significant adverse impacts on local amenity, and as set out in **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** following the implementation of mitigation measures detailed within the **CEMP [EN010168/APP/7.12]**, the **CTMP [EN010168/APP/7.22]**, the **BSMP [EN010168/APP/7.21]**, the **OEMP [EN010168/APP/7.13]**, and the Outline **Decommissioning Strategy [EN010168/APP/7.14]**, there are no significant effects anticipated from the construction, operation and decommissioning of the Scheme on air quality or noise. These will be secured by Requirements of Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**.
PSP9: Health Impact Assessments	All new development proposals should provide an environment that promotes health and wellbeing, addresses adverse health impacts and reduces health inequalities. For Very Major Developments proposals* applicants will be required to consult the Director of Public Health at pre-application stage to ascertain whether a HIA is required and, if so, the requisite level. Where required, the applicant must submit a Health Impact Assessment and address its recommendations in the planning application.	As set out in Section 18.5 of **ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]**, assessment of Highway Improvement Areas has not been included as the likely effects relating to these parts of the Scheme are extremely spatially and temporally limited, and as such are anticipated to be negligible or imperceivable with respect to likely human health effects. For the Scheme as a whole, Section 18.2 of **ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1]** confirms the Applicant has consulted with Wiltshire Council's Public Health Team,

Policy	Detail	Scheme Compliance
		the UK Health Security Agency (UKHSA) and Office of Health Improvement and Disparities (OHID), and local stakeholders including relevant NHS Trusts and emergency response services. Details of these consultations are set out in **ES Volume 3, Appendix 18-1: Human Health Consultation [EN010168/APP/6.3]**. Details of consultation with the public health team at Wiltshire Council are set out in Table **Error! No text of specified style in document.**-1: Statutory Consultation with Wiltshire Council of Section 18.2 **ES Volume 1, Chapter 18: Human Health [EN010168/APP/6.1].** This notes the consideration of the human health baseline assessment in light of discussion with Wiltshire Council. The chapter provides a suitable assessment of human health, with the human health impact assessment methodology detailed in Section 18.6.
PSP11: Transport Impact Management	Development proposals which generate a demand for travel, will be acceptable where: 1. appropriate, safe, accessible, convenient, and attractive access is provided for all mode trips arising to and from the proposal; and 2. any new or improved bus stops meet the Council's adopted standards and the appropriate national guidance; and 3. residential development proposal(s) are located on:	The Scheme within South Gloucestershire aims to implement strategic transport infrastructure to improve accessibility to the Solar PV Sites and Cable Route Corridor, so as to limit the impact on the South Gloucestershire road network. These enhancements of highway infrastructure will contribute towards ensuring the Scheme has appropriate, safe and convenient access. The Highways Improvement Areas within South Gloucestershire are as follows are as follows: • A46 Bath Road/Acton Turville Road Junction, Tormarton – Minor temporary road widening at

Policy	Detail	Scheme Compliance
	i. safe, useable walking and, or cycling routes, that are an appropriate distance to key services and facilities and then ii. where some key services and facilities are not accessible by walking and cycling, are located on safe, useable walking routes, that are an appropriate distance to a suitable bus stop facility, served by an appropriate public transport service(s), which connects to destination(s) containing the remaining key services and facilities; and 4. commercial development is located on safe, useable walking routes, that are an appropriate distance to a suitable bus stop facility, served by appropriate public transport services, linking to major settlement areas; and 5. appropriate on-site loading, unloading and waiting facilities are provided for commercial developments; and 6. it would not generate traffic that would: i. create or contribute to severe congestion; ii. severely impact on the amenities of communities surrounding access routes (local network to strategic road network); iii. have an unacceptable effect on highway and road safety; iv. harm environmentally sensitive areas; and	the junction and temporary removal of keep left bollards on traffic island (it is assumed that the traffic island is overrunable and will remain in place). • A46 Bath Road/B4040 Junction, Old Sodbury – Temporary minor road widening at the junction, temporary removal of give-way and no-entry signage, and trimming of existing hedge/tree branches. An **Outline CTMP [EN010168/APP/7.22]** has been prepared and will be secured through the DCO. The CTMP provides a framework for the management of construction vehicle movements to and from the Scheme, to ensure that the effects of the temporary construction phase on the local highway network are minimised. The **Outline CTMP [EN010168/APP/7.22]** sets out construction access arrangements, construction vehicle routing, construction vehicle trip generation, and the management/mitigation measures. It also summarises the requirements for vehicles to transport AIL (for elements such as transformers). All construction routes can accommodate construction vehicle movements, with Highway Improvement Areas in place. **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.3]** concludes that following the implementation of embedded and additional mitigation measures there will be no significant residual effects

Policy	Detail	Scheme Compliance
	7. any new transport related infrastructure provided in relation to the proposal would not create or exacerbate traffic congestion or have an unacceptable effect on highway and road safety; and 8. unobstructed emergency vehicle access is provided; and 9. potentially significant transportation impacts are accompanied by an appropriate Transport Assessment and where necessary a Travel Plan.	on Transport and Access, with all effects during the construction and decommissioning stages being temporary and short term. 1. Access to and from the Scheme has been considered as set out in Section 13.9 of **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]**, the **Outline CTMP [EN010168/APP/7.22]** includes measures for the provision of shuttle buses to transport construction works to and from the Order Limits. Additionally, Highway Improvement Areas will be created whereby sections of road considered unsuitable for construction vehicles will be managed to accommodate them, this includes widening of roads, ensuring sufficient passing room is present, or traffic management is implemented to ensure the safe movement of construction vehicles. 2 - 5. Are not relevant to the Scheme, as it does not include the provision of new bus stops and is not classified as commercial development. 6. The Transport Assessment in **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]** has assessed traffic impacts resulting from the Scheme. **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.3]** concludes that the effects of temporary changes in traffic flows on the local highway network associated with the construction phase of the Scheme are not

Policy	Detail	Scheme Compliance
		anticipated to be significant. This follows the implementation of a number of mitigation measures which includes localised access widening and passby bays; use of banksmen and localised traffic management; implementation of an **Outline CTMP [EN010168/APP/7.22];** and implementation of an **Outline PROW and Permissive Path Management Plan [EN010168/APP/7.17]**. Section 1.9 of **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.3]** confirms that no material impact on the local highway network is anticipated during the operation and maintenance phase, whilst vehicles associated with decommissioning phase are not anticipated to exceed the number set out during the construction phase, with an **Outline Decommissioning Strategy [EN010168/APP/7.14]** to support the management of vehicles during this time. 7. As set out in Section 13.9 of **ES Volume 1 Chapter 13: Transport and Access [EN010168/APP/6.3]**, the Scheme will provide 12.8km of new permissive paths and widen some parts of existing roads as part of the Highway Improvement Areas. With regard to Highway Improvement Areas, these changes will contribute positively to potential traffic congestion by enabling the effective and safe movement of construction vehicles. As set out in Section 4.2 of the **Outline PRoW and Permissive Path Management Plan**

Policy	Detail	Scheme Compliance
		[EN010168/APP/7.17], the new permissive paths, which will be open up to 365 days per calendar year throughout the proposed 60-year operational lifetime of the Scheme, will facilitate greater public access to the Countryside making a positive contribution to local connectivity. 8. Section 13.11 of **ES Volume 1 Chapter 13: Transport and Access [EN010168/APP/6.1]** details consideration of emergency vehicle access which includes the availability of steel plates on site. 9. The Applicant has undertaken a Transport Assessment in **ES Volume 3, Appendix 13-1: Transport Assessment [EN010168/APP/6.1]**, this has informed the assessment provided in **ES Volume 1 Chapter 13: Transport and Access [EN010168/APP/6.3]** which sets out a number of measures to manage transport and access impacts. Following the implementation of these measures, the chapter concludes in Section 13.14 that no residual significant effects are anticipated. Measures proposed include an **Outline CTMP [EN010168/APP/7.22]** which will manage traffic associated with the Scheme during construction, whilst a Decommissioning Traffic Management Plan (DTMP) will manage traffic during decommissioning. The DTMP will be managed under the **Outline Decommissioning Strategy [EN010168/APP/7.14]**.

Policy	Detail	Scheme Compliance
		The **Outline PRoW and Permissive Path Management Plan [EN010168/APP/7.17]**, **Outline CTMP [EN010168/APP/7.22]**, and **Outline Decommissioning Strategy [EN010168/APP/7.14]** will be secured via requirements 16, 15, and 20 under Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**.

Draft South Gloucestershire Local Plan (2025)

Policy	Detail	Scheme Compliance
LPS9: Sustainable Movement & Transport Infrastructure	**<u>Movement Principles</u>** 1. Development proposals will need to demonstrate they are located in sustainable locations and that they provide users of new development with a range of travel options that maximise opportunities for walking, wheeling, cycling and public transport and which minimise the need to travel by the private car and assist in reducing carbon emissions. 2. Development proposals should use the movement principles below to demonstrate how users will access health, education, work and other services and facilities, as defined in saved policy PSP11 or its replacement. Developments that are unable to demonstrate how sustainable access will be achieved, using a combination of the below principles, will not be supported. Development should: a. Be located in proximity to existing services and facilities, as defined in saved policy PSP11, or provide a suitable level of new services and facilities on site; and b. Be located adjacent to the Active Travel Network and be able to connect to and enhance the Active Travel Network. Extension, connection and enhancement to the Active Travel Network should be delivered to standards set out in saved	Where the construction routes pass through sections of road that are considered narrow and require widening, these have been adopted into the design as 'Highway Improvement Areas' which will ensure that sufficient passing room is present along the routes or traffic management is implemented to ensure the safe movement of construction vehicles. All construction routes can accommodate construction vehicle movements, with Highway Improvement Areas in place. The Scheme within South Gloucestershire aims to implement strategic transport infrastructure to improve accessibility to the Solar PV Sites and Cable Route Corridor, so as to limit the impact on the South Gloucestershire road network. These are as follows: • A46 Bath Road/Acton Turville Road Junction, Tormarton – Minor temporary road widening at the junction and temporary removal of keep left bollards on traffic island (it is assumed that the traffic island is overrunable and will remain in place). • A46 Bath Road/B4040 Junction, Old Sodbury – Temporary minor road widening at the junction, temporary removal of give-way and no-entry signage, and trimming of existing hedge/tree branches.

Policy	Detail	Scheme Compliance
	policy PSP10 to provide for walking, cycling, wheeling and where appropriate equestrian; and c. Be located in proximity to suitable and established public transport connections or demonstrate how proposals will enhance or provide suitable public transport connections. 3. In addition to compliance with principles a-c in paragraph 2 above, development proposals should support the decarbonisation of travel through further interventions including the following where the location or scale of development allow: a. Support the delivery of sustainable rural alternatives to private car travel, for example through Demand Responsive Transport or other alternatives. b. Support the continued operation or establishment of new community transport. c. Support and deliver Shared Mobility Schemes on site. d. Provide or contribute to the delivery of strategic Mobility Hubs, to support connectivity and improve door to door travel times. e. Make provision for additional on-site electric vehicle charging infrastructure above minimum building regulations and policy requirements where relevant (see	The Scheme includes measures to support the decarbonisation of travel through the reduction in private car usage. The **Outline Construction Traffic Management Plan (CTMP) [EN010168/APP/7.22]**, includes measures for the provision of shuttle buses to transport construction workers to and from the Site. It is expected that the shuttle bus will be able to accommodate 20 workers on average (shuttle buses are likely to be varying size). In addition, workers who drive will be encouraged to car share where practicable. The **Outline CTMP [EN010168/APP/7.22]** will be secured by Requirement 15 in the **Draft DCO [EN010168/APP/3.1]**, As set out in **Chapter 13: Transport and Access [EN010168/APP/6.1],** following the implementation of embedded and additional mitigation measures, overall, there are no significant residual effects on transport and access, with all being short term and temporary. Mitigation measures, including measures for the Highway Improvement Areas, are set out in are set out in **Chapter 13: Transport and Access [EN010168/APP/6.1],** the **Outline CEMP [EN010168/APP/7.12]** and traffic management measures are set out in the **Outline CTMP [EN010168/APP/7.22]**. These measures will be secured by Requirements of Schedule 2 of the **Draft DCO [EN010168/APP/3.1].**

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	Parking Requirements, Including Electric vehicles), to support swifter decarbonisation of transport. **<u>Inclusive and Safe Development</u>** 4. Streets connecting to and within new development must be designed to be safe and accessible for walking, cycling and wheeling* to all sections of our community recognising the range and diversity of needs. **<u>Strategic Infrastructure interventions to deliver Local Plan growth</u>** 5. Priority will be given to the implementation of strategic infrastructure proposals that support modal shift and the decarbonisation of travel. All new development proposals will be required to contribute financially or in kind to support the delivery of the packages below. 6. The Council will work with its partners to deliver within the plan period the following key projects: a. Active Travel Package b. Ring Road Package c. Yate Package d. North Fringe Package (Woodlands/Almondsbury) e. Severnside Package	

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	f. Mobility and Car Club Package **<u>Safeguarding Land</u>** 7. Development will not be permitted where it is prejudicial to the Council's strategy of developing the strategic infrastructure packages to deliver Local Plan growth, or other strategic transport measures that may emerge through the Joint Local Transport Plan or its replacement/successor. 8. Rail track beds and associated land will be safeguarded for their continuing use or reuse for public transport or rail freight, or foot and cycleways. 9. Land in the following locations is identified for transport infrastructure safeguarding and are defined on the Policies Map: a. Severn Beach station improvements b. Pilning station safeguarding c. Westerleigh Junction upgrade	
LPS10: Climate Change, Sustainable Design and Construction	1. Development proposals must demonstrate how they will address both the mitigation of climate change and the adaptation to its escalating effects to support the delivery of local and national climate objectives. **<u>Climate mitigation, adaptation and resilience in development</u>**	The Scheme within South Gloucestershire Council is limited to several Highway Improvement Areas. However, the wider Scheme these relate to has undergone an iterative design process as set out in the **Design Approach Document [EN010168/APP/7.3]** to ensure it is resilient to climate change and sustainable in design. **ES Volume 1, Chapter 7: Climate Change [EN010168APP/6.1]** considers direct and indirect impacts across the lifetime of the Scheme

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	2. All development proposals must: a. Minimise heating and cooling energy demand and associated emissions of greenhouse gas emissions, using layout, orientation and built form and net zero energy (or Passivhaus equivalent) fabric efficiency standards b. Maximise on-site renewable energy generation with the objective of meeting annual energy demand c. Minimise embodied carbon and make efficient use of natural resources d. Ensure the proposal has been designed to be resilient to the effects of a changing climate e. Include measures to show how they will utilise water efficiently. 3. New development will be expected to demonstrate through an Energy and sustainability statement how it would incorporate these measures, including the detailed technical requirements as set out in the technical policies. These measures should be integrated into the design of new development from the outset and be considered at all stages of the design process. **BREEAM**	(constructions, operation and decommissioning). It includes a Climate Change Risk Assessment, which provides a description of how the Scheme will be affected by climate change impacts, taking into consideration the embedded mitigation measures that have been designed into the Scheme so that it will be more resilient to the impacts identified during the review of the UK Climate Projections 2018 (UKCP18) data. **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** concludes that during the different stages of the Scheme (construction, operation and decommissioning), inevitable greenhouse gas (GHG) emissions will be generated with associated products, transport, energy and fuel-use. However, the wider Scheme also incorporates embedded and additional mitigation to ensure it is resilient to climate change. In particular: • The Scheme has been designed carefully to ensure it is resilient to flooding, including siting the most vulnerable elements are located in areas of lower flood risk, taking account of various climate change scenarios. Further detail on the mitigation proposed is provided in Annex C: Sequential and Exception Test accompanying this Planning Statement, **ES Volume 3, Appendix 11-2: Flood Risk Assessment [EN010168/APP/6.3]** and **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**;

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	4. For major non-residential development, a BREEAM assessment will be required, using the most up to date BREEAM methodology. A BREEAM 'Excellent' Rating will be required. 5. For residential or mixed-use development consisting of more than 100 residential units, a BREEAM Communities scoping assessment will be required to determine whether a partial or full BREEAM Communities Assessment is required. Where a full BREEAM Communities Assessment is applicable an 'Excellent' rating will be required.	• The **Outline CEMP [EN010168/APP/7.12]** and **Outline Decommissioning Strategy [EN010168/APP7.14]** contain measures to reduce waste, maximise reuse and recycling and reduce emissions from construction activities and transportation. • The **Outline CEMP [EN010168/APP/7.12]** contains measures to ensure contractors monitor weather forecast and plan work to protect workers from extreme weather conditions; and • The **Outline Operation Environmental Management Plan (OEMP) [EN010168/APP7.13]** includes a commitment to embed resilience to projected increases in temperature by selecting inverters and BESS with an adequate cooling and ventilation system to control the temperature and enable efficient operation in warmer conditions. These measures will be secured by Requirements of Schedule 2 of the **Draft DCO [EN010168/APP/3.1].** Nature-based solutions are incorporated into the Scheme design to offset and mitigate the impact of climate change as a result of the Scheme. The rationale for all nature-based mitigation is set out in **ES Volume 1, Chapter 9: Ecology [EN010168APP/6.1]**, with enhancements further detailed in the **Outline LEMP [EN010168/APP/7.18]**. Measures include

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		substantial new hedgerow and tree planting, reinforcement planting at existing hedgerows and field boundaries, extensive grassland habitat creation and sympathetic management both within buffers and within the arrays, as well as discrete, valuable habitat creation (e.g. ponds and meadows) in appropriate locations. Section 7.9 of **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** sets out the embedded measures that have been incorporated into the Scheme related to climate change impacts. As detailed in the **Design Approach Document [EN010168/APP/7.3]** and Section 2 of the **Planning Statement [EN010168/APP/7.2]**, the Scheme has undergone an iterative design process which has resulted in the delivery of a functional and efficient Scheme design which will deliver large amounts of renewable and low carbon energy while being sensitive to local context and surroundings, and minimising impacts on the environment as far as practicable. The Scheme itself mitigates against the effects of climate change. There is a need to generate electricity and generating this through solar power results in less GHG emissions than other conventional methods. **ES Volume 3, Chapter 3: The Scheme [EN010168/APP/6.1]** outlines how the Scheme design will retain a degree of flexibility to enable it to adapt over time, be functional and fit for purpose, and respond to innovative and new technologies as well as building resilience to climate change. The Scheme (as a renewable energy scheme) maximises the

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		opportunity to incorporate measures to become more efficient and includes a BESS to provide flexibility, releasing energy to the NETS when it is required most. BREEAM assessments have not been undertaken for The Scheme as it comprises an NSIP under the Planning Act 2008. Nevertheless, climate mitigation, adaptation and resilience in development have been considered, as demonstrated above.
LP23: Climate Change Adaptation and Resilience	1. The climate we experience at present is not the climate we will experience in the future. All development will need to demonstrate that its vulnerability to climate change has been taken into consideration through the provision of a climate change adaptation and resilience assessment. **<u>Assessment of climate risk</u>** 2. Adaptation and resilience assessments should include an assessment of the proposal's context using the latest evidence base and climate change projections available for the lifetime of the development taking into consideration the probability and consequences of the risks and the changing level of risk over time. This assessment should: a. Identify climate change hazards; associated risks; and where present,	The Scheme within South Gloucestershire Council is limited to several Highway Improvement Areas. However, the wider Scheme also incorporates embedded and additional mitigation to ensure it is resilient to climate change. In particular: • The Scheme has been designed carefully to ensure it is resilient to flooding, including siting the most vulnerable elements are located in areas of lower flood risk, taking account of various climate change scenarios. Further detail on the mitigation proposed is provided in Annex C: Sequential and Exception Test accompanying this Planning Statement, **ES Volume 3, Appendix 11-2: Flood Risk Assessment [EN010168/APP/6.3]** and **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]**; • The **Outline CEMP [EN010168/APP/7.12]** and **Outline Decommissioning Strategy [EN010168/APP7.14]** contain measures to reduce waste, maximise reuse and recycling

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	opportunities; including but not limited to more extreme temperature, drought, rising sea levels and flooding for: i. The development and associated infrastructure. ii. Current and future occupants if known, (as specific additional considerations or measures may be appropriate to different groups). iii. Development's surroundings. b. Identify the vulnerability of the development's present and future occupants if known, and inhabitants of the proposal's surroundings. c. Identify local needs and opportunities relating to climate change impacts. d. Identify whether the development is in a location that could exacerbate climate change risks in the surrounding area. **<u>Informed design</u>** 3. The assessment will feed into the design of the development, and should be used to inform as appropriate: a. Layout, form, massing and orientation of the development. b. External hard and soft landscape design.	and reduce emissions from construction activities and transportation; • The **Outline CEMP [EN010168/APP/7.12]** contains measures to ensure contractors monitor weather forecast and plan work to protect workers from extreme weather conditions; and • The **Outline OEMP [EN010168/APP7.13]** includes a commitment to embed resilience to projected increases in temperature by selecting inverters and BESS with an adequate cooling and ventilation system to control the temperature and enable efficient operation in warmer conditions. These will be secured by Requirements within Schedule 2 of the **Draft DCO [EN010168/APP/3.1].** **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** has considered the direct and indirect impacts of climate change in terms of water shortages, storms, heatwaves and wildfires. Tables 7-34 and 7-35 of **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** set out that following the implementation of embedded mitigation measures and those set out in the **Outline CEMP [EN010168/APP/7.12]**, no significant impacts, as defined in Section 7.6 of **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1],** will occur from these direct impacts during the construction, operation and decommissioning of the Scheme. The conclusion of the assessment is that, overall, the Scheme is likely

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	c. Building design and building integrated measures. d. Use of green and blue (and brown) infrastructure. 4. The strategy should demonstrate how an adaptation pathway approach has been taken to ensure the development has been designed to: a. Be resilient to climate change impacts for the lifetime of the development. b. Be adapted to risks and to take advantage of opportunities. c. Provide for the comfort, health and wellbeing of current and future occupants. d. Not make the surrounding area less resilient to climate change impacts, and where appropriate is designed to support identified local needs and opportunities associated with climate change. **<u>General principles</u>** 5. The adaptation and resilience assessment should include: a. Technical modelling and assessment of the risk of overheating in current and future climate change scenarios and demonstrate how this modelling has informed the design so that the overheating risk is minimised, and any	to result in significant and beneficial residual effects for the whole Scheme lifecycle due to the clean energy produced by the Scheme, which will provide a net reduction in GHG emissions compared to a scenario without the Scheme. Ecological enhancements such as hedgerow, woodland and tree planting have been incorporated into the Scheme design and are outlined in the **Outline LEMP [EN010168/APP/7.18]**. This will be secured by Requirement 7 of Schedule 2 of the **Draft DCO [EN010168/APP/3.1].** As set out in the **Design Approach Document [EN010168/APP/7.3]**, the Scheme will result in sustainable infrastructure that is sensitive to place, by delivering a design that has followed the mitigation hierarchy to avoid and reduce environmental impacts as far as possible, integrates with the landscape, provides ecological and landscape enhancements and improves recreational facilities in the area through the creation of 12.8 km of new permissive paths, which will be open up to 365 days per calendar year throughout the proposed 60-year operational lifetime of the Scheme, while ensuring that the Scheme can provide urgently needed renewable and low carbon energy into the National Grid at Melksham. The Applicant is committed to achieving the Government's target of at least 10% biodiversity net

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	residual risk is overcome ensuring that cooling needs are met sustainably. b. Demonstration of how water supplies will be conserved. c. Demonstration of how multifunctional blue and green infrastructure has been used to provide both climate adaptation (e.g. shade to indoor and outdoor spaces, reduction of surface water run-off rates, reduction of the urban heat island effect) and biodiversity benefits. d. Demonstration of how comfort will be maintained in outdoor spaces. e. Description of how the development is resilient to flooding and use multifunctional SuDS. f. A description of how the development responds to other significant climate risks identified. g. Demonstration of how the responses to climate change avoid or minimise increases to energy use and CO2 emissions.	gain as set out in the Environment Act 2021 and in accordance with Requirement 9 of Schedule 2 of **Draft DCO [EN010168/APP/3.1]**. The **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]** sets out how a minimum of 10% net gain will be achieved for the Scheme (using the Defra Statutory Biodiversity Metric). This sets out the net gains in biodiversity that the Scheme will provide. The **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]** indicates that BNG in excess of 10% will be achieved, with a total net gain of 63.80% for area habitat units, 19.35% for hedgerow units and 25.30% for watercourse units in relation to the Solar PV Sites. The total net gain for the whole Scheme (i.e. Solar PV Sites and Cable Route Corridor combined) is 34.75% for area habitat units, 12.31% for hedgerow units and 20.08% for watercourse units, as set out in the **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]**.
LP25: Embodied Carbon	**Embodied carbon – general principles** 1. All proposals will be expected to show how development will minimise its embodied carbon. 2. In doing so, development should: a. Prioritise the renovation or retrofit of existing structures, as part of an efficient	The Scheme is limited to several Highway Improvement Areas within South Gloucestershire. However, the Scheme as a whole, which include the Highway Improvement Areas, has assessed and taken steps to minimise its embodied carbon as demonstrated in **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]**. **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]**

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	use of land, subject to technical feasibility, compatibility with the other policies in the local plan, in particular resilience to overheating, and any relevant neighbourhood plans; b. Minimise the quantity of materials required to meet the building's functional requirements; c. Select high quality materials and systems which: d. Have low embodied carbon, and; e. Minimise the need for replacement over the lifetime of the development, and; f. Can be reused, recycled and disposed of sustainably at end of life, and g. Ensure that waste reduction is designed-in from project inception to completion, including consideration of the use of standardised components, modular build, and reuse of secondary products and materials; h. Ensure that new buildings are flexible and adaptable to future uses, reducing the need for future redevelopment. 3. All proposals should set out how these issues will be addressed in the Energy and Sustainability Statement, with major applications required to provide additional information and calculations as set out below. **<u>Embodied carbon – major applications</u>**	presents a lifecycle greenhouse gas (GHG) impact assessment, which assesses the significant of the GHG impacts on climate over the lifetime of the Scheme (construction, operation, maintenance, and decommissioning). Section 7.9 of **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** includes an assessment of embodied carbon, a Climate Change Risk Assessment, which provides a description of how the Scheme will be affected by climate change impacts, taking into consideration the embedded mitigation measures that have been designed into the Scheme so that it will be more resilient to the impacts identified during the review of the UK Climate Projections 2018 (UKCP18) data. **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** sets out that renewable energy generation from the Scheme during the first year of operation is estimated to be around 415,000MWh/year if tracker panels are used and around 438,000MWh/year if fixed panels are implemented The total energy generated by the Scheme would be around 23.54TWh and 24.26TW over the 60-year Scheme lifespan for tracker and fixed panels respectively. Accounting for the estimated construction phase and operation phase emissions, the Scheme's total carbon intensity value is 39.63gCO2e/kWh for tracker panels and 38.46gCO2e/kWh for fixed panels.

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	4. Proposals for major development will be required to include an Embodied Carbon Assessment, submitted as part of the Energy and Sustainability Statement. The assessment should use a nationally recognised embodied carbon assessment methodology, and demonstrate actions taken to reduce whole lifecycle embodied carbon emissions. 5. Major new development will be expected to achieve the following targets as a minimum: a. Upfront embodied carbon (construction phase) i. Residential (4 storeys or fewer) - <400kgCO_{2e}/m^2 ii. Residential (5 storeys or greater) - <500kgCO_{2e}/m^2 iii. Major non-residential schemes - <600kgCO_{2e}/m^2 b. Whole life-cycle embodied carbon: i. Residential (4 storeys or fewer) - <625kgCO_{2e}/m^2 ii. Residential (5 storeys or greater) - <800kgCO_{2e}/m^2 iii. Major non-residential schemes - <970kgCO_{2e}/m^2 6. Where it is not viable to meet these targets for embodied carbon, a full justification will be required as part of the Embodied Carbon Assessment within the Energy and Sustainability Statement.	**ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** concludes that the findings of the GHG assessment indicate that the Scheme will yield beneficial impacts and achieve a net reduction in GHG emissions, compared to a scenario without the Scheme. Furthermore, **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** also concludes that the Scheme's design and integrated mitigation measures effectively address climate change risks and that no significant climate change risks during the construction, operation and maintenance or decommissioning phase have been identified. An **Outline Site Waste Management Plan (SWMP) [EN010168/APP/7.16]** for the waste generated by the construction of the Scheme, as required by point 15 of Policy LP25 will be secured under Requirement 19 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1].**

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	7. Any shortfall against the embodied carbon targets will be offset through a financial contribution towards South Gloucestershire Council's carbon offset fund. 8. The value of a tonne of CO2e is tied to the 'high' scenario in the Valuation of Energy Use and Greenhouse Gas supplementary guidance to the Treasury's Green Book (£373 at the time of publication), and will be updated accordingly. **Refrigerants** 9. In all new development with fixed building services that include a refrigerant, the global warming potential (GWP) of the refrigerants should be minimised, by designing systems to have the lowest possible refrigerant mass/charge and specifying appliances (including heat pumps, VRFs, VRVs and chillers) that use refrigerants with the lowest global warming potential available, and implementing measures to minimise the risk of refrigerant leakage, and to detect refrigerant leakage. 10. Refrigerants and their associated impacts should be included and accounted for within the embodied carbon assessment conducted by the developer using an approved methodology as set out in the guidance[1]. **Materials**	

[1] https://beta.southglos.gov.uk/static/bbaa40bbf30310057fc7a6a44434e285/Net-Zero-Carbon-Toolkit.pdf

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	11. The materials used in development should use and manage resources as efficiently as possible. As well as having low embodied carbon within the materials, the wider environmental impacts arising from their sourcing, manufacture, construction, and end of life demolition and disposal must be considered within the Energy and Sustainability Statement. 12. Development should avoid the use of tropical hardwoods, unless these are reclaimed, reused or recycled, and if virgin tropical hardwoods are specified, provide full justification showing that there are no feasible alternatives. **Demolitions, waste and recycling** 13. Development proposals should seek to minimise and design-out construction and end-of-life waste, ensuring that waste reduction is planned in from project inception to completion, including consideration of standardised components, modular build, designing for deconstruction, and reuse of secondary products and materials. Where waste is generated, reuse and recycling should be maximised. 14. Where development proposals include demolition, this should aim to maximise the amount of material recovered for reuse and recycling, either on-site or at another site (either directly or via broker). Demolition materials should be recovered at their highest value possible.	

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	15. Major proposals should submit a site waste management plan as part of their Energy and Sustainability Statement.	
LP26: Renewable and Low Carbon Energy Systems	1. Proposals for the generation of renewable energy and associated infrastructure; or the recovery of waste heat or cooling; and proposals that support the transition to a smart, flexible, and zero carbon energy system will be supported in the context of sustainable development and climate change. The contribution of the proposals, in light of the Council's climate and nature emergency declaration and national carbon reduction targets, to cutting greenhouse gas emissions and decarbonising our energy system, is a material consideration. 2. When assessing proposals: a. Great weight is to be given to the conservation of heritage assets and their setting. The impact of any proposal on the significance of any non-designated heritage assets should also be taken into account; and b. Landscape and visual impact; conservation of and impact on designated ecological assets; impact on amenity; cumulative impact; and other considerations as relevant (including those specific to each technology) should be taken into account.	The Scheme within South Gloucestershire includes Highway Improvement Areas to improve accessibility to the Solar PV Sites and Cable Route Corridor, so as to limit the impact on the South Gloucestershire road network. These are as follows: • A46 Bath Road/Acton Turville Road Junction, Tormarton – Minor temporary road widening at the junction and temporary removal of keep left bollards on traffic island (it is assumed that the traffic island is overrunable and will remain in place). • A46 Bath Road/B4040 Junction, Old Sodbury – Temporary minor road widening at the junction, temporary removal of give-way and no-entry signage, and trimming of existing hedge/tree branches. South Gloucestershire Council declared a climate emergency in July 2019 and the Highway Improvement Areas within the authority contribute to the delivery of a Scheme that represents a significant and commercially rational step forward in the fight against the global climate emergency as set out in the **Statement of Need [EN010168/APP/7.1]**.

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	3. Proposals must include measures to enhance and enable nature and biodiversity in scheme design for the lifetime of the development. 4. Opportunities for the co-location of renewable energy generation with energy demand and storage for local need, will be encouraged. Where a proposal is linked to an existing use, is located in close proximity (to that use) and is designed to displace otherwise imported energy (to that use); this will be considered an additional benefit. 5. Proposals to re-power wind and solar PV farms at the end of their operational life can make efficient use of land and in principle will be considered favourably, provided the turbines and/ or solar panels are replaced with new equipment of either the same or larger installed capacity (when this has no significant change on off-site impact), and subject to compliance with statutory, site-specific, and other constraints. 6. Proposals require appropriate plans and a mechanism in place for the removal of the technology on cessation of generation. Site restoration should maintain or enhance the sites ecological value. In addition to the above, the following will be considered for the specific technologies outlined: 7. Wind Energy a. Areas safeguarded for wind energy development are defined on the Policies Map.	An assessment of the heritage impacts of the Scheme are set out in **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]**. Following the implementation of embedded and additional mitigation measures, the Scheme will not have any residual significant effects on heritage assets and their setting within South Gloucestershire. **ES Volume 1 Chapter 8: Landscape and Visual [EN010168/APP/6.1]** includes a landscape and visual assessment of abnormal indivisible loads where works are required in relation to widening and passing bays to accommodate the AILs. This includes the A46 Bath Road/ B4040 junction, Old Sodbury. **ES Volume 1 Chapter 8: Landscape and Visual [EN010168/APP/6.1]** concludes that the landscape and visual effect is negligible. Nature and biodiversity enhancements are proposed through the Scheme and are set out in the **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]** secured by the **Outline LEMP [EN010168/APP/7.18]** under Requirement 7 of Schedule 2 of the **Draft DCO [EN010168/APP/3.1].** The Scheme has been designed to retain the most valuable habitats and protect these with undeveloped buffer zones. The selection of access locations has been carefully considered to utilise existing field entrances and gaps in hedgerows wherever possible.

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	b. Proposals within these safeguarded areas are subject to the assessment of the other criteria as set out in this policy and other relevant policy. c. Wind energy development will need to demonstrate through Habitats Regulations Assessment of the proposals that there will be no adverse effects on the integrity of SAC, SPA or Ramsar sites, for example through impacts on the flight paths and habitat corridors of protected mobile species such as birds and bats, or at functionally linked habitat associated with protected sites. d. Proposals for development that is not associated with wind energy within these safeguarded areas will only be acceptable where: iv. it can be demonstrated that they would not prejudice or interfere with the operation of any installed, permitted, proposed or future potential wind energy installation or its enabling infrastructure; or v. the use proposed would be temporary, and would not restrict the potential future use of the area (or adjacent land) to be developed for wind energy; or	Internal access tracks have been sited to avoid ecological buffer zones wherever possible. In the Cable Route Corridor, Horizontal Direction Drilling will be implemented for selected Avoidance Areas to minimise effects on particularly sensitive features. Temporary construction compounds in the Cable Route Corridor have also been sited sensitively to avoid impact zones for bat species. The **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]** indicates the Scheme will deliver, as a minimum, 10% biodiversity net gain, which is secured via Requirement 9 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**. The **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]** indicates that BNG in excess of 10% will be achieved, with a total net gain of 63.80% for area habitat units, 19.35% for hedgerow units and 25.30% for watercourse units in relation to the Solar PV Sites. The total net gain for the whole Scheme (i.e. Solar PV Sites and Cable Route Corridor combined) is 34.75% for area habitat units, 12.31% for hedgerow units and 20.08% for watercourse units, as set out in the **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]**.

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	vi. it can be demonstrated that due to permanent technical generation related constraints, there is no reasonable likelihood of a wind energy installation ever coming forward on or within reasonable proximity to the application site or that an exception should be made based on substantial public benefits arising from the proposal. vii. It is also considered that large new development sites or safeguarded employment sites may be suitable in principle for wind energy development subject to the assessment of the other criteria as set out in the policy, all other relevant policy, and any further material considerations. 8. Ground mounted Solar a. Proposals for ground mounted solar developments should avoid being sited on the best and most versatile agricultural land unless significant benefits can be shown which would outweigh the temporary loss of the land. 9. Mine-water a. Proposals should not have an unacceptable impact on the water regime and water quality impacts are assessed and mitigated.	The **Outline Decommissioning Strategy [EN010168/APP/7.14]**, which will be secured by Requirement 20 of Schedule 2 of the **Draft DCO [EN010168/APP/3.1],** provides measures, to ensure the project will be safely removed and land restored at the end of the operational life of the Scheme. However, the Highway Improvement Areas will be in place for construction only. Highways Improvements Areas (refer to **ES Volume 2, Figure 2-1: Elements of the Site [EN010168/APP/6.2]**) are sections of the highway network that will contain localised improvements, such as improvements to road edge where it is deteriorated, or temporary highway and traffic works required to safely accommodate the Abnormal Indivisible Load (AIL) deliveries. These areas will support the movement of construction vehicles on narrower sections of the local highway network within parts of the construction vehicle routes to the Site (refer to **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]**). The Highway Improvement Areas in South Gloucestershire are not located on BMV agricultural land so this is not a relevant consideration for Scheme design. As set out in **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** the Scheme includes a BESS to provide flexibility, releasing energy to the NETS when

Policy	Detail	Scheme Compliance
	10. Energy balancing including storage and generation a. Proposals for new energy generation or storage installations/ proposals, that support the transition to a smart energy system are considered an integral part of a low carbon energy system and will be acceptable when; i. They demonstrate that the lowest emission technology available has been utilised; ii. They are in an appropriate location; iii. There has been satisfactory resolution of issues in relation to fire risk. b. Our strong preference is for the inclusion of energy storage technology alongside energy deployment (for large scale energy development (over 1MW). c. Fossil fuel-based energy installations in which greenhouse gas emissions are not captured and sequestered, are not considered compatible with a net zero energy system and as such will only be acceptable where no other alternative is available and for a temporary period. Full justification should be set out in the Energy and sustainability statement.	it is required most. This will not be located within South Gloucestershire. The Scheme's interaction with any other renewable energy installations is assessed in **Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1]. ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1]** presents the findings of an assessment of the potential for cumulative and in-combination effects as a result of the Scheme. Table 21-7 in ES Volume 1, **Chapter 21: Cumulative and In-Combination Effects [EN010168/APP/6.1]** summarises the potential effect interactions. The assessment identifies that, taking a conservative worse case approach, significant cumulative effects with the short list of developments are identified at a limited and discrete number of receptors comprising tourism and recreation impacts during the construction phase for example, on Corsham Park, PRoW WT|CORM|122, WT|HULL|29, and Sustrans Cycle Route 403, and on skylark at a District level. However as set out in the **Planning Statement [EN010168/APP/7.2]**, these significant cumulative effects have only been identified during the construction phase and do not continue into the operation of the Scheme. Accordingly, significant cumulative effects are limited to the short-term. Furthermore, inter project communication will take place to minimise tourism and recreation impacts whilst the impact to skylark is likely to reduce to not significant as and when further details of mitigation are

Policy	Detail	Scheme Compliance
		proposed in any application to discharge the relevant conditions of 18/08271/OUT (which would be required before any development could take place). Within the majority of technical chapters, no likely significant effects have been identified through the cumulative effects assessment where they were not already predicted for the Scheme in isolation. **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** has identified significant cumulative effects within 1 km Local Study Area during Construction and Year 1. However, there are no cumulative development sites within the 1 km Study Area and the significant effects are derived solely from the Lime Down Scheme. The Scheme effects included consideration of the existing Hullavington Solar Farm within 1 km Local Study Area as part of the baseline.

Wiltshire and Swindon Minerals Core Strategy 2006-2026 (adopted 2009)

Policy	Detail	Scheme Compliance
MCS6: Safeguarding Mineral Resources, Rail-head Facilities and Mineral Recycling Facilities	In establishing, monitoring and reviewing Mineral Safeguarding Areas (MSAs) the Councils will work with the minerals and waste industries, land owners and other local planning authorities to safeguard the following assets from potential sterilisation by other forms of development: • Mineral Resource Zones; • All existing active and dormant minerals sites; • Land within 1km of active and dormant mineral sites; • Sites for future mineral working allocated within DPDs; • Operational land associated with existing and proposed Mineral Recycling Facilities; and • Operational land associated with the existing Rail Aggregate Depot at Wootton Bassett and any proposed new rail-head facilities and sidings.	Section 20.2 of **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** sets out that the impact of the Scheme is limited to two safeguarded areas; the Oolitic Limestone MSA and the Bristol Avon Mineral Resource Zone (MRZ) and MSA. The potential impact of the Scheme on identified and protected mineral resources is limited to the Cable Route Corridor which crosses two identified mineral deposits, comprising building stone and sand and gravel deposits. The building stone deposit is worked by mining at depth and would be unaffected by the installation or maintenance of Grid Connection Cables. To avoid affecting these deeper lying minerals, mitigation during construction will be implemented including trenching to a depth of no more than ~2m (except at one crossing near Corsham), use of low-impact excavation methods to minimise ground pressure in mined areas, and coordination with Monks Park Mine operators to ensure safety precautions are in place. These measures are provided for in the **Outline CEMP [EN010168/APP/7.12]** of which a detailed version will be secured via Requirement 13 under Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**.

Policy	Detail	Scheme Compliance
		With regard to the sand and gravel deposits, while the installation of cables would introduce a constraint to working the sand and gravel deposits for the life of the Scheme, the area affected is of limited extent, on the periphery of the deposit, of poorer quality than elsewhere within Wiltshire, with Section 1.9 of the Wiltshire and Swindon Aggregate Minerals Site Allocations Local Plan noting the British Geological Survey and mineral industry have confirmed the sand and gravel deposits at this location are typically shallow and of poorer quality than the Upper Thames Valley gravels. Additionally, the area is already highly constrained by existing land uses to the extent that the mineral is not considered to be available to be worked. As set out in the Wiltshire and Swindon Aggregate Minerals Site Allocations Local Plan sets in Section 1.9 the minerals industry has indicated they are not keen to move to this area in the foreseeable future unless market conditions dictate otherwise. The Applicant also proposes to incorporate Parts 2 and 3 of Schedule 2 of the Acquisition of Land Act 1981 into the DCO, which provides compensation mechanisms in certain circumstances where an owner seeks to work underlying mines or minerals that are likely to damage the Scheme.

Wiltshire and Swindon Minerals Development Control Policies Development Plan Document (adopted 2009)

Policy	Detail	Scheme Compliance
MDC4: Safeguarding Mineral Resources, Rail-head Facilities and Mineral Recycling Facilities	Proposals for development within Mineral Safeguarding Areas, as defined on the Proposals Map, that may prevent or adversely affect current or possible future mineral extraction and/or associated ancillary operations, rail-head facilities, and mineral recycling facilities within Wiltshire and Swindon will be opposed unless: • An appropriate quantity of mineral can be reasonably extracted prior to or in phase with the proposed non-mineral development such that the extraction does not unreasonably prevent or hinder the non-minerals development; or • It can be proven that the mineral deposit is unlikely to be worked due to its quality or quantity; or • The development is of a temporary nature and can be completed and the site restored to a condition that does not inhibit extraction within the timescale that the mineral is likely to be needed; or • There is an overriding need for the proposed non-minerals development to commence without delay.	As set out in Section 20.2 of **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]**, the mineral deposit area affected by the Scheme is unlikely to be worked. The Minerals Site Allocations Local Plan already acknowledges that the sand and gravel deposits in the Bristol Avon MRZ are typically shallow and of poorer quality than elsewhere within Wiltshire. The Wiltshire and Swindon Aggregate Minerals Site Allocations Local Plan sets out in Section 1.9 that the minerals industry has indicated they are not keen to move to this area in the foreseeable future unless market conditions dictate otherwise. In addition, above ground plant and structures associated with the Scheme would be decommissioned and removed during the decommissioning phase, which would restore the baseline condition of identified mineral resources (infrastructure is only left in the ground such as cable ducts after decommissioning where these do not present any significant constraint to future mineral extraction).

Policy	Detail	Scheme Compliance
		As noted above, the Applicant also proposes to incorporate Parts 2 and 3 of Schedule 2 of the Acquisition of Land Act 1981 into the DCO, which provides compensation mechanisms in certain circumstances where an owner seeks to work underlying mines or minerals that are likely to damage the Scheme.

Wiltshire and Swindon Waste Core Strategy 2006-2026 (adopted 2009)

Policy	Detail	Scheme Compliance
WCS6: Waste Reduction and Auditing	Proposals for developments that meet the criteria below will be required to design and provide facilities for occupiers of the development to recycle / compost waste (bring systems) and / or facilities within individual or groups of properties or premises for the source separation and storage of different types of waste for recycling and / or composting. • any development providing 10 or more dwelling units; • any new development of shopping centres or facilities where the total gross floorspace amounts to 500 square metres or more; • any development of business, industrial, distribution or storage development where the gross floorspace / increase in gross floorspace amounts to 300 square metres or more; • transport, leisure, recreation, tourist, community, or educational facilities including public car parks and park and ride facilities. Such provision will be expected to have regard to the existing capacity of facilities already available and to the existing Recycling Plan or Municipal Waste Management Strategy relevant to the area.	As set out in Section 20.3 of **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]**, the Scheme has been designed, as far as practicable, to avoid and reduce impacts and effects on materials and waste through the process of embedding measures into the Scheme design. In accordance with the waste hierarchy, the Scheme will prioritise waste prevention, followed by preparation for reuse, recycling, and recovery, with landfill disposal as the last resort. Measures are set out the **Outline CEMP [EN010168/APP/7.12], Outline Site Waste Management Plan [EN010168/APP/7.16]** and the **Outline Operation Environmental Management Plan [EN010168/APP/7.13]** and **Outline Decommissioning Strategy [EN010168/APP/7.14]** which cover the construction, operational and decommissioning phases. Key measures include: • The Scheme will aim to prioritise waste prevention, followed by preparing for reuse, recycling and recovery and lastly disposal to landfill as per the waste hierarchy • The contractor will consider the objectives of sustainable resource and waste management and seek to use material resources efficiently, reduce waste at source, reduce waste that

Policy	Detail	Scheme Compliance
	Proposals for the developments identified above must also be accompanied by a waste audit, which must include: a) the type and volume of waste that the development process will generate (the development process comprises the construction process and any other operations necessary to bring the development into being); b) the steps to be taken to reduce, re-use and recycle any waste that is produced through the development process; c) the steps to be taken to reduce the production of hazardous wastes in the development process; d) the steps to be taken to minimise the use of raw materials in the development process; e) the steps to be taken to reduce the use of hazardous materials in the development process; f) the steps to be taken to minimise the pollution potential of unavoidable waste; g) the steps to be taken to dispose of unavoidable waste in an environmentally acceptable manner; h) the steps to be taken to ensure maximum waste recovery (e.g. recycling and composting) once the development is completed/occupied; and i) proposals for the transport of waste created during the development process and subsequent use of the site. Development proposals outside of the thresholds above will be required to demonstrate that they have had	requires final disposal to landfill and apply the principles of the waste hierarchy. This would include, where reasonably practical, segregation of decommissioning materials on-site for appropriate reuse, recycling and recovery with landfill as a last resort. • All waste management will be undertaken in accordance with the relevant regulations (as outlined in **ES Volume 3, Appendix 20-2: Materials and Waste Legislation, Policy and Guidance [EN010168/APP/6.3])** and waste would be transported by licensed waste hauliers to waste management sites which hold the necessary regulatory authorisation and/or permits for those wastes consigned to them. • Waste would be segregated to be reused and recycled where reasonably practicable. These measures will be secured by Requirements in Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**. The assessment in Section 20.3 of **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** concludes that no residual significant effects have been identified for materials and waste.

Policy	Detail	Scheme Compliance
	sufficient regard to minimising waste produced as part of the development process and to the waste hierarchy in identifying a chosen management method for wastes that are produced as part of the development process.	

Neighbourhood Plan Accordance Tables

Hullavington Neighbourhood Plan 2016 - 2026 (made 2019)

Policy	Detail	Scheme Compliance
Policy 1: Settlement Boundary	The settlement boundary is identified in the Proposals Map. Development proposals will be supported **WITHIN** the settlement boundary, subject to compliance with Policy 3 in the Neighbourhood Development Plan and other relevant policies of the Development Plan. Development proposals **OUTSIDE** the settlement boundary will be supported where: • they are in accordance with the Development Plan Policies in respect of appropriate uses in the countryside; • they relate to necessary utilities infrastructure and where no reasonable alternative location is possible; and • they are in compliance with Policy 3 within this Neighbourhood Development Plan	The Scheme lies outside the settlement boundary for Hullavington, however Hullavington is located approximately 700 m south of Lime Down D. The Scheme, in accordance with the Development Plan Policies, represents appropriate use in the countryside as it is classed as Critical National Priority Infrastructure (see Section 8.2 of the **Planning Statement [EN010168/APP/6.3]**). **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3]** sets out the six-stage approach used by the Applicant to identify the proposed location for the Scheme. The Site Selection Assessment Report concludes that there are no obviously more suitable and available locations within the 20 km search area than the proposed location for the Scheme and that the Scheme's location is therefore assessed to be suitable for the scale of solar development proposed. As set out in the **Design Approach Document [EN010168/APP/7.3]** the site selection process was strongly influenced by the need to deliver good design. Section 2.4 of the **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3]** explored opportunities to locate the Solar PV Panels on previously development land/brownfield land, contaminated land, industrial land and commercial

Policy	Detail	Scheme Compliance
		rooftops. However, none of these provided an adequate area to facilitate a large NSIP scale solar project equivalent to the Scheme and therefore the chosen site is considered appropriate. The Scheme demonstrates compliance with Policy 3 of this Neighbourhood Plan as described below.
Policy 3: Planning applications in the Parish, apart from Site 690	All proposals for development or redevelopment, where appropriate having regard to the size and scale of the development, will be expected to: 1. deliver predominantly 2 and 3 bed properties unless it can be demonstrated through robust, up to date market evidence an alternative mix is required, including the appropriate number of affordable housing as required by WCS CP43; and ensure that any new affordable housing is allocated in line with Wiltshire Council's Affordable Housing allocation policies and procedures current at the time of any planning application; 2. deliver high quality, well designed homes that use traditional external materials, where possible; designed to be in keeping with the historic buildings and layout of the village; referencing the 'Design Concept for Development' Appendix 3. Designs should be locally distinctive reflecting style and scale proportionate to the historic central spine of Hullavington (which can be seen in Fig. 11 on page 7);	**ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** details the flexibility the Applicant wishes to retain in relation to the design of the Scheme to allow it to maximise energy efficiency and active design approaches when it comes to detailed design and construction. The **Design Approach Document [EN010168/APP/7.3]** details how this was considered from the outset of Scheme design through the adoption of a design principle setting out that the Scheme will retain a degree of flexibility to enable it to adapt over time, be functional and fit for purpose, and respond to innovative and new technologies as well as building resilience to climate change. **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3]** sets out how landscape and visual were taken into account during the early site selection process for the Scheme. **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** sets out how the Scheme design has changed to be sympathetic to landscape concerns including the setting of the Cotswolds National Landscape. Section 3.5 of the

Policy	Detail	Scheme Compliance
	3. strongly encourage the incorporation of sustainable design features facilitating accessible and adaptable dwellings; 4. actively support opportunities for maximizing energy efficiency in terms passive and active design approaches to sustainable development; 5. be designed to take account of both: Wiltshire's Landscape Character Assessment and Historic Landscape Characterisation; so as to respect the village's wider rural landscape and historic setting; 6. provide high quality boundary treatments, which reflect the character of the Parish, referring to the 'Design Concept for Development' Appendix 3, using traditional materials, such as dry stonewalling, where possible, to keep the development in context with both the village and wider Parish. Where new green landscaping boundaries are planted, they shall be comprised of native or wildlife enhancing hedgerow species, to encourage biodiversity; 7. include landscaping within the development that reflects the traditional, rural context of the village and any new green landscaping shall be of native or wildlife enhancing species, to encourage biodiversity; 8. protect and where possible enhance wildlife habitats and corridors, encouraging biodiversity by conserving the network of green infrastructure that contributes towards increasing biodiversity, providing appropriate	**Design Approach Document [EN010168/APP/7.3]** sets out how the local landscape context was considered from early stage to inform the adoption of design principles that result in a Scheme sympathetic to the landscape context of the area. Design Principle 1 sets out how the Scheme is 'landscape led' and gives due weight to the intrinsic character and beauty of the surrounding countryside. **ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [EN010168/APP/6.1]**, demonstrates consideration of both: Wiltshire's Landscape Character Assessment and Historic Landscape Characterisation. The 'Design Concept for Development' has not been considered given this relates to building new homes, although the Wiltshire Design Guide was taken into account in developing the Design Principes for the Scheme, as set out in the **Design Approach Document [EN010168/APP/7.3]**. As set out in **ES Volume 1, Chapter 8: Landscape and Visual Impact Assessment [EN010168/APP/6.1]**, **Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** and the **Outline LEMP [EN010168/APP/7.18]** the Scheme proposes to deliver substantial new hedgerow and tree planting, reinforcement planting at existing hedgerows and field boundaries, extensive grassland habitat creation and sympathetic management both within buffers and under the Solar PV arrays, as well as discrete,

Policy	Detail	Scheme Compliance
	buffers to existing natural spaces that have community, biodiversity and heritage significance, applicants are encouraged to submit a biodiversity action plan with any application; 9. contribute to the provision, extension and maintenance of accessible green space, including green space for sport and children's play space for the enjoyment of residents, in accordance with Wiltshire Council's Open Space Standards; 10. where possible, retain historic on-site public right of ways within an attractive setting. Any unavoidable loss of quality or extent should be compensated for locally offsite, such that there is no net detriment to the quality or extent of the public right of way network; 11. ensure proposals that may impact on a heritage asset, whether designated or non-designated, should be accompanied by an assessment of the significance of the asset and the impact of the proposal upon its significance, using appropriate expertise, where necessary. In the case of a heritage asset with archaeological interest, a desk top assessment should be submitted and, where necessary, a field evaluation carried out; 12. protect the residential amenity of adjoining occupiers; 13. demonstrate that there is adequate parking to meet the current minimum standards and show	valuable habitat creation away from the Solar PV Panels. This includes connective woodland planting; mixed grassland/wildflower planting; enhanced riparian native planting; reinforced road-side screening; hedgerow reinforcement and enhancements to ponds. These are shown on **ES Volume 2, Figure 3-1: Indicative Site Layout Plan [EN010168/APP/6.2]** and **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2]**. The Scheme also provides a number of measures to mitigate impacts to, and enhance green infrastructure. This includes a number of enhancements that improve upon the current environment, resulting in a number of significant beneficial effects. These are set out in further detail in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** and include: • Overall significant beneficial effects at local level on grassland and various species as a result of the reversion of the arable fields which currently dominate the Solar PV Sites to grassland for the lifetime of the Scheme; • Significant long term beneficial effects at local level relation to hedgerow and woodland habitats, as a result of the proposed hedgerow, woodland and tree planting outlined in the **Outline LEMP [EN010168/APP/7.18]**; • A significant beneficial effect at site-to-local level on the extent of standing water habitat as a result of the creation of new ponds. Details of

Policy	Detail	Scheme Compliance
	how the car parking will be integrated within any landscaping scheme for the proposed development so as not to dominate the street scene; 14. provide an appropriate level of private external amenity space to include refuse, recycling and cycle storage to ensure a high quality and a well-managed property and streetscape; 15. provide accessible pedestrian and cycle connections to the surrounding countryside and village, with particular focus to those who are using a pushchair, wheelchair, walking aid or mobility scooter; and 16. demonstrate traffic generation and parking does not adversely affect road and pedestrian safety.	the proposed ponds are set out in **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2]** and measures for their creation are set out in the **Outline LEMP [EN010168/APP/7.18]**; and • A significant beneficial effect at site level on the quality of the local ditch and watercourse network. The **Outline CEMP [EN010168/APP/7.12]** details measures and approaches to be adopted which will limit the likelihood of significant effects upon retained habitats through damage, pollution and disturbance during the construction phase in order to secure the mitigation measures set out in the **ES [EN010168/APP/6.1/6.2/6.3]**. An **Outline Ecological Protection and Mitigation Strategy [EN010168/APP/7.19]** has also been produced, providing more detailed ecology-focussed protection and mitigation prescriptions for the construction phase of the Scheme which complements the more general environmental prescriptions of the **Outline CEMP [EN010168/APP/7.12].** Following additional mitigation outlined in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** significant effects are anticipated on hedgerows within the Cable Route Corridor through temporary loss of habitat, and breeding birds through displacement of ground nesting birds from Solar PV

Policy	Detail	Scheme Compliance
		Sites. However, the residual significant adverse effects are limited to site and local level and are far outweighed by the residual significant beneficial effects anticipated in relation to habitats and other species, together with the overwhelming need for and other benefits of the Scheme. Due to the nature of the Scheme it will not directly contribute to the provision or extension and maintenance of accessible green space. However, the Scheme, being located largely on existing agricultural land, is not anticipated to directly impact on the use and accessibility of dedicated recreational spaces such as parks, open spaces and playing fields. The Scheme will retain public rights of ways (PRoW), it is anticipated that PRoW which cross the Order Limits will generally remain open during the construction, operation and maintenance and decommissioning phases of the Scheme and will be managed in accordance with the measures in the **Outline PRoW and Permissive Paths Management Plan [EN010168/APP/7.17]** to ensure user safety, for instance at construction vehicle crossings. However, the following temporary closures/diversions are also envisaged (see the **Public Rights of Way Plan [EN010168/APP/2.5]** for the locations of the closures/diversions): • PRoW MALW54 will be temporarily diverted for the duration of the construction phase for

Policy	Detail	Scheme Compliance
		health and safety reasons and to avoid conflict with construction vehicles accessing Lime Down E, at Access 18. The diversion will run adjacent to the existing alignment. Once construction is complete, the PRoW will return to its existing alignment; • PRoW GRIT20 (located in the Cable Route Corridor) will be temporarily diverted for the duration of the construction phase for health and safety reasons and to avoid conflict with construction vehicle access at Access 102. The diversion will run adjacent to the construction compound to the north and east. Once construction is complete, the PRoW will return to its existing alignment. • Temporary closures may also be required during construction for installation of Grid Connection Cables, but this will likely last not more than one day (or overnight). Where temporary closures are deemed to be necessary, these will be prioritised for overnight work (when there are unlikely to be PRoW users), and sufficient notice will be given to users and the local highway authority so far as practicable. As set out in the **Planning Statement [EN010168/APP/7.2]**, the Scheme includes the creation 12.8 km of new permissive paths, which will be open up to 365 days per calendar year throughout the proposed 60-year operational lifetime of the

Policy	Detail	Scheme Compliance
		Scheme to provide pedestrians and horse and bicycle riders improved accessibility to the countryside and improved connectivity of the wider PRoW network. This includes permissive path for pedestrians, equestrians and cyclists connecting SHER18 to Fosse Way with an onward connection to HULL26 and a permissive path for pedestrians, equestrians and cyclists connecting HULL26 and running adjacent to Fosse Way in Lime Down C. Also proposed is a path for pedestrians through Lime Down D connecting PRoW HULL1, HULL2, HULL4, HULL5, MALW50 and MALW49. The location of the proposed permissive paths is outlined on the **Works Plan [EN010168/APP/2.3]** as Work No.10B**.** The design and implementation of the proposed permissive paths is set out in the **Outline Public Rights of Way and Permissive Paths Management Plan [EN010168/APP/7.17]** and their creation and maintenance are secured through a Requirement in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**. **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** provides an assessment of the likely significant effects of the Scheme on designated and non-designated assets, including consideration of their significance and setting. **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** concludes that following the implementation of embedded and

Policy	Detail	Scheme Compliance
		additional mitigation measures there will be no residual significant effects on any designated or non-designated assets as a result of the Scheme. **ES Volume 3, Appendix 12-1: Heritage Statement [EN010168/APP/6.3]** details that the south-western boundary of Lime Down E is located approximately 750 m north-east of Hullavington Airbase Conservation Area at their nearest points, with Solar PV Panels proposed within Fields E18-E21 and Fields E26-E27. There is no intervisibility with Lime Down E from within the Conservation Area or along its boundaries and it is considered no harm would occur to Hullavington Conservation Area. The alignment of the Cable Route Corridor passes approximately 120 m north (Field F122) and approximately 80 m west of Surrendell Farm (Fields F120-121) at its nearest points. A construction compound will be established within Field F121, approximately 200 m north-west of Surrendell Farm as part of the Cable Route Corridor works. Surrendell Farm is situated approximately 550 m south and approximately 415 m south-west of Lime Down C at their nearest points. The topography north of Surrendell Farm drops only slightly towards Lime Down C, so there is presently some intervisibility between these two areas. As a result, the majority of Field C13 has been removed from the Order Limits, with Solar PV Panels having also been entirely

Policy	Detail	Scheme Compliance
		removed from the remainder of Field C13. Solar PV Panels have also been entirely removed from the easternmost part of Field C15 and all of Field C16. Throughout Lime Down C, screening has been proposed, including the enhancement of existing hedgerows and establishment of new areas of low density scrub. It is considered that there will be less than substantial harm to Surrendell Farm as a result of the Scheme, but this is at the lower end of the Scale. Less than substantial harm (at the lower end of the scale) is also anticipated to the non-designated Townleaze Barn due to construction activities. This effect is temporary in nature. The removal or partial removal of Solar PV from the Scheme has also been undertaken in other fields within Hullavington CP to mitigate against potential heritage impacts. This includes the removal of Solar PV from fields C24 to C28 to mitigate any impacts to Farleaze Farmhouse. Other fields that have been completely removed due to heritage sensitivities include D9 and D10. Solar Panels have also been partially removed from fields C15, D4, D6 and D11. It is considered the substantial public benefits and need for the Scheme, set out in Section **Error! R eference source not found.** of the **Planning Statement [EN010168/APP/7.2]**, clearly and demonstrably outweigh the less than substantial harm

Policy	Detail	Scheme Compliance
		(at the lower end of the scale) to any of the identified designated heritage assets. **ES Volume 3, Appendix 12-1: Heritage Statement [EN010168/APP/6.3]** concludes that the Scheme will not lead to substantial harm to any designated heritage assets. The Scheme will not lead to substantial harm to or loss of significant to any assets of the highest significance including Scheduled Monuments, Protected Wreck Sites, Registered Battlefields, grade I and II* Listed Buildings, grade I and II* Registered parks and Gardens, and World Heritage Sites. In terms of amenity, **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 and **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** provides an assessment of noise impacts. Following the implementation of mitigation measures detailed within the **Outline CEMP [EN010168/APP/7.12]**, the **Outline CTMP [EN010168/APP/7.22]**, the **Outline BSMP [EN010168/APP/7.21]**, the **OEMP [EN010168/APP/7.13]**, and the **Outline Decommissioning Strategy [EN010168/APP/7.14]**, the battery containers will be located more than 350 m from the nearest PRoW and more than 600 m from any residential receptors. There are no significant effects anticipated from the construction, operation and decommissioning of the Scheme on air quality or

Policy	Detail	Scheme Compliance
		noise. These will be secured by Requirements in Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**. In terms of parking, as set out in the **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]** a compound area for contractors will be set up on-site, including appropriate parking spaces. Contractors and visitors will be advised that parking facilities will be provided on-site in advance of visiting the Order Limits and that they should not park on-street; Advisory signs informing contractors and visitors that parking will not be permitted on-street in the vicinity of the Order Limits or on access roads. Private external amenity space is not appropriate for a Scheme of this nature, however Section 20.3 of **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** sets out the Applicant's proposals for the management of waste and demonstrates that waste will be properly managed, both on-site and off-site. The chapter confirms the Scheme has been designed as far as practicable to avoid and reduce impacts and effects on materials and waste through the process of embedding measures into the Scheme design. Additionally, the chapter confirms the construction, operation and maintenance, and decommissioning of the Scheme are to be appropriately controlled to manage and minimise potential environmental effects. In particular, waste management measures have been set out in the

Policy	Detail	Scheme Compliance
		Outline SWMP [EN010168/APP/7.16] for the waste generated by the construction of the Scheme. This includes a requirement to apply the waste hierarchy, targets for non-hazardous waste recovery and recycling, recording requirements for the transfer of waste, and methods of reporting. Following the inclusion of the embedded and additional mitigation measures no significant residual effects are identified for materials and waste. The impacts of traffic and transport from the Scheme in **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]**, including the suitability of access roads, and an **Outline CTMP [EN010168/APP/7.22]** has been prepared and will be secured Requirement 15 in Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**. The **Outline CTMP [EN010168/APP/7.22]** provides a framework for the management of construction vehicle movements to and from the Scheme, to ensure that the effects of the temporary construction phase on the local highway network are minimised. The **Outline CTMP [EN010168/APP/7.22]** sets out construction access arrangements, construction vehicle routing, construction vehicle trip generation, and the management/mitigation measures. It also summarises the requirements for vehicles to transport AIL (for elements such as transformers).

Sherston Neighbourhood Plan 2006 to 2026 (made 2019)

Policy	Detail	Scheme Compliance
Policy 1: Protection of Community Services, Facilities and Business Premises	Facilities, services, shops and local businesses recognised as important to the local community are shown on Maps 5A and 5B and listed below. The loss of community facilities or services, or the change of use of businesses to non- business or non-community uses, will be resisted. Where a change of use that would result in the loss of a community asset or service, or the change of use of a business to a non-business or non-community use is proposed, this should demonstrate why the benefits arising from the proposal outweighs the harm to the community in respect of the loss of a local asset and must be supported by evidence to demonstrate that the existing use of the asset is no longer viable, including at least six months active marketing for an alternative community or business use, taking full account of local market conditions. Facilities/premises to be protected: A. Village Hall B. Scout Hut C. British School Room D. The Methodist Chapel E. Carpenter Arms PH F. The Rattlebone PH G. The Angel (hotel and restaurant) H. Grays Garage	**ES Chapter 16: Socio-Economic, Tourism and Recreation [EN010168/APP/6.1]** provides an assessment of the likely significant impacts of the Scheme on community facilities. This includes the findings of the assessment of likely effects on socio-economics, tourism and recreation as a result of the Scheme in relation to socio-demographic effects, economic effects (employment and GVA), attractions and visitor locations, PRoW, and recreational venues. **ES Volume 1, Chapter 16: Socio-Economic, Recreation and Tourism [EN010168/APP/6.1]** identifies and assesses the impact on key local tourism and recreational facilities including: • Key tourist and visitor attractions of local, regional and national importance likely to be impacted by the Scheme; • Locally and regionally important parks and nature reserves; • PRoW and long-distance walking and cycling routes; • Navigable waterways and waterbodies used for recreation; • Recreation aviation centres; • Recreational hubs for organised sports and youth sports and play likely to be impacted by the Scheme; and

Policy	Detail	Scheme Compliance
	I. The Old School (shops and offices) J. Tucks K. The Tolsey Surgery L. Apples and Pears M. The Wine Shop N. Stretchline Premises O. Pinkney Park Business Units P. B & W Equine Vets at Willesley	• Equestrian businesses and facilities likely to be impacted by the Scheme. **ES Volume 1, Chapter 16: Socio-Economic, Recreation and Tourism [EN010168/APP/6.1]** concludes that there are limited significant adverse effects on facilities, with no adverse effects present during operation. During construction and decommissioning adverse effects are identified and include long distance recreational routes, PRoW and permissive routes, equestrian facilities, and park farm. These are classed as medium term and temporary for both construction and decommissioning.
Policy 2: Protection of Open Spaces and Open Areas	The Village Hall field, the Recreation Ground and the Allotments, shown on Map 6, are designated as Local Green Space, where new development is ruled out other than in very special circumstances. Development must respect the character and appearance of the land identified on Map 7, at Avon river valleys, Manor Farm and Grove Wood.	The Scheme is not located on Local Green Space as designated by the Sherston Neighbourhood Plan. Section 4.2 of the **Design Approach Document [EN010168/APP/7.3]** sets out that the Scheme has been designed to be sensitive to place over the lifetime of the development. These include (but are not limited to): • Integration within the local landscape. • Enhancements to accessibility and including the creation of 12.8 km of new non-vehicular permissive paths, which will be opened up to 365 days per calendar year throughout the proposed 60-year operational lifetime of the Scheme. • Green infrastructure enhancements.

Policy	Detail	Scheme Compliance
		• Biodiversity Net Gain. The details of the measures are set out within the **Outline LEMP [EN010168/APP/7.18]**, **Outline Ecological and Mitigation Protection Strategy [EN010168/APP/7.19]**, **Outline CEMP [EN010168/APP/7.12]** and the **Outline Public Rights of Way and Permissive Paths Management Plan [EN010168/APP/7.17]**. These measures will be secured by Requirements in Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**. As per **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** Lime Down A is located approximately 240 m to the southeast of the small village of Sherston which is situated on the eastern edge of the Cotswolds National Landscape. No development will take place on Manor Farm and Grove Wood. No significant effects have been recorded during construction and Year 1 regarding the Landscape Fabric, as the effect of mitigation measures will be limited initially. Moderate beneficial effects have been identified for the Scheme at operation and maintenance phase and the decommissioning phase as a result of the landscape and biodiversity enhancements. Significant adverse effects would remain during all phases to nine Public Receptors (including one in Sherston, WT|SHER|16 TP097) as set out in Table 1-24 in **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]**.

Policy	Detail	Scheme Compliance
		ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] also concludes that there would be significant adverse effects in the 1km local study area during construction and in Year 1 of operation which is primarily related to the change in land use from agriculture to the Scheme. At Year 15 and decommissioning the effect reduces to not significant.
Policy 9: Protection of Sports Facilities	The loss of existing open space, sports and recreational buildings and land, including playing fields, will be resisted unless it can be clearly demonstrated that the open space, buildings or land is surplus to requirements; or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quality and quantity in a suitable location; or the development is for alternative sports and recreation provision, the need for which clearly outweighs the loss	**ES Volume 1, Chapter 16: Socio-Economic, Recreation and Tourism [EN010168/APP/6.1]** confirms the Scheme would not lead to the loss of any open space, sports or recreational buildings and land, including playing fields, as designated through the Sherston Neighbourhood Plan.

Adopted Malmesbury Neighbourhood Plan (2015) and Draft Neighbourhood Plan (2022)

Policy	Detail	Scheme Compliance
Policy 13 (same for both plans)	The Neighbourhood Plan Design Guide as set out in Volume II of this Plan should be taken into consideration in all developments to ensure a high quality of design that respects the specific character of Malmesbury Town and the surrounding area.	As set out in the **Design Approach Document [EN010168/APP/7.3]**, the Scheme is located within the Malmesbury Neighbourhood Plan Area and therefore the requirements, including the Neighbourhood Plan Design Guide, have been considered where they set out requirements for good design for the local area. The **Design Approach Document [EN010168/APP/7.3]** also details the iterative design process for the Scheme and how the Scheme has been designed to be sensitive to place over the lifetime of the development. These include (but are not limited to): • Integration within the local landscape. • Enhancements to accessibility and including the creation of new 12.8 km of new non-vehicular permissive paths, which will be open up to 365 days per calendar year throughout the proposed 60-year operational lifetime of the Scheme. • Green infrastructure enhancements. • Biodiversity Net Gain. The details of these measures are set out within the **Outline LEMP [EN010168/APP/7.18]**, **Outline Ecological and Mitigation Protection Strategy [EN010168/APP/7.19]**, **Outline CEMP [EN010168/APP/7.12]** and the **Outline Public Rights**

Policy	Detail	Scheme Compliance
		of Way and Permissive Paths Management Plan [EN010168/APP/7.17]. These measures will be secured by Requirements in Schedule 2 of the **Draft DCO [EN010168/APP/3.1]**. As set out in the **Design Approach Document [EN010168/APP/7.3]** the Scheme has also adopted design principles from the outset to guide the design of the Scheme. Design Principle 1 sets out that the design of the Scheme will be 'Landscape Led' and give due weight to the intrinsic character and beauty of the surrounding countryside, while design principle 2 has been adopted to ensure adherence to the mitigation hierarchy to reduce impacts and control any adverse effects on the environment throughout the lifecycle of the Scheme from construction through to operation and maintenance and decommissioning. This has led to the following design changes in relating to feedback and good design considerations (note the changes below relate only to Lime Down E given its proximity to Malmesbury – refer to the **Design Approach Document [EN010168/APP/7.3]** for further changes): • Removal of field E16 from the Scheme due to landscape and visibility matters (being on higher ground), and removal of field E8 (previously intended to be used for ecological mitigation) from the Order Limits following further field work due to the lack of suitability of the field for ecological mitigation. • Removal of Solar PV Panels from fields E7, E9 and E10 following further considerations

Policy	Detail	Scheme Compliance
		relating to visibility of the panels due to the gradient of the land, as well as to ensure the protection of existing vegetation. • Other refinements including the removal of small areas of Solar PV Panels to allow for environmental buffers and environmental mitigation and enhancement as a result of further surveys and consultation feedback. In addition to the reduction of the Order Limits in and around Lime Down E, the Order Limits have increased by 0.25 ha south west of Rodbourne, and 0.09 ha south of Rodbourne to ensure there is enough space for an internal access route, allowing utilisation of an existing access track.

Joint Melksham Neighbourhood Plan 2 (2025)

Policy	Detail	Scheme Compliance
Policy 1: Sustainable Design and Construction	As appropriate to their scale, nature and location, development proposals should demonstrate how they have mitigated and been designed to adapt to the impacts of climate change. This includes: a. the submission of a Sustainable Energy Strategy to demonstrate how carbon emissions are minimised, with the target of zero carbon in operation (regulated and unregulated energy); b. embedding the Energy Hierarchy within the design of buildings by prioritising fabric first, orientation, design, and landscaping, to minimise energy demand for heating, lighting, and cooling, as well as maximising renewable energy generation. Proposals should respond positively to opportunities to improve space heating and energy consumption by considering a range of low-carbon and renewable technologies; c. demonstrating good connections to existing services and facilities, and/or a mix of uses that minimises the need to travel by private vehicle; d. b. using carbon sequestration and other sustainable approaches such as shade; and e. the retention of existing buildings where practicable, and the incorporation of associated	The **Statement of Need [EN010168/APP/7.1]** and Section 5 of the **Planning Statement [EN010168/APP/7.2]** explain that the Scheme, if consented, will be a substantial infrastructure asset, which will be capable of delivering over 100 MW of cheap, secure, and low carbon electricity, helping the UK achieve its Sixth Carbon Budget commitments and stay on track to achieve net zero by 2050. Maximising the capacity of generation in the proposed location for the Scheme represents a significant and commercially rational step forward in the fight against the global climate emergency. The Scheme has been designed, as far as practicable, to avoid and reduce impacts and effects on Climate Change and to increase Climate Change resilience through the process embedding measures into the design. For construction, **ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1]** sets out measures to minimise the need of construction staff to travel by private vehicle including encouraging the use of lower carbon modes of transport, communicating local bus connections and pedestrian and cycle access routes to/from the Scheme to all construction staff, providing appropriate facilities for the safe storage of cycles and

Policy	Detail	Scheme Compliance
	retrofitting measures to improve the energy performance of existing buildings.	implementing a shuttlebus to reduce the number of trips made by construction staff. Similar measures will be developed prior to the decommissioning phase for the use of lower-carbon and more climate change resilient methods and will be outlined in the **Outline Decommissioning Statement [EN010168/APP/7.14]**. Detail about the measures is limited as the decommissioning environment beyond 2089 is likely to be considerably different to today. Whilst the Scheme is not for new homes, it does incorporate nature-based solutions into its design to offset and mitigate the impact of greenhouse gas emissions. The rationale for all nature-based mitigation is set out in **ES Volume 1, Chapter 9: Ecology [EN010168APP/6.1]**, with enhancements further detailed in the **Outline LEMP [EN010168/APP/7.18]**. These include substantial new hedgerow and tree planting, reinforcement planting at existing hedgerows and field boundaries, extensive grassland habitat creation and sympathetic management both within buffers and within the arrays, as well as discrete, valuable habitat creation (e.g. ponds and meadows) in appropriate locations. These measures are secured in the Outline **LEMP [EN010168/APP/7.18]**, to be secured by Requirement 7 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**.

Policy	Detail	Scheme Compliance
		ES Volume 1, Chapter 7: Climate Change [EN010168/APP/6.1] details how the Scheme has adapted to a changing climate including considering the direct and indirect impacts of climate change in terms of water shortages, storms, heatwaves and wildfires, incorporating SuDS into the design of the Scheme to manage surface water flows, and locating vulnerable infrastructure in lower areas of flood risk. The Scheme includes BESS as associated development which allows the Scheme to help store surplus energy to be released at time of higher demand, thereby supplying and using energy efficiently. Further information on the BESS can be found in **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1].**
Policy 2: Local Renewable and Low Carbon Energy Generation	1. Proposals for renewable energy, low carbon energy a. generation projects/developments, and associated infrastructure, including Battery Energy Storage Systems (BESS), will be supported where it can be demonstrated that: the siting and scale of the proposal is appropriate to its setting; b. the proposal will not result in adverse impacts on the local environment which cannot be satisfactorily mitigated;	**ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3]** sets out how the site selection process has been undertaken and determined that the site is appropriate for the Scheme. The Applicant followed a six-stage approach to identify and evaluate the proposed Scheme location and other potential areas for solar development, as follows: • Stage 1: Identification of an area of search near the available grid connection point. • Stage 2: Exclusion of various planning, environmental and spatial constraints, in accordance with policy considerations (such as a preference not to site on best and most versatile

Policy	Detail	Scheme Compliance
	c. the proposal does not create an unacceptable impact on the amenity and safety of local receptors, and d. the proposal does not have an unacceptable degree of impact on a feature of natural or biodiversity importance. Proposals for stand alone, ground mounted solar photovoltaic development should demonstrate, where possible that some form of agricultural activity will continue, and/or there are biodiversity improvements around arrays; and, e. the proposal, when taking into consideration other renewable and low carbon energy developments and associated infrastructure in the area, will not result in an unacceptable cumulative impact. 2. Schemes which result in direct benefits to the local community such as energy supplied directly, or financial benefits, will be supported. Proposals for community energy generation projects (with full or partial ownership and/or control by a local community) will be strongly supported. In addition, schemes where the energy produced can be used on or near the generation site/where energy storage is incorporated will be supported. In both cases,	agricultural land), to identify the most unconstrained land. • Stage 3: Application of considerations around site size and land assembly, use of previously developed land and topography to identify potential development areas on the remaining land. • Stage 4: Evaluation of the identified potential development areas against assessment indicators such as ecology and biodiversity, land use, landscape and visual, flood risk etc. • Stage 5: Widening the search to consider further potential development areas on parcels of Grade 3 agricultural land, and land within flood zones 2 and 3. • Stage 6: Widening the search to consider further potential development areas on parcels of land with a higher gradient (5% or less). **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [EN010168/APP/6.3]** concludes that there are no more suitable and available locations within the 20km search area than the proposed location for the Scheme and that the Scheme's location is therefore assessed to be suitable for the scale of solar development proposed. A suitable grid connection exists at National Grid Melksham Substation to connect to the NETS with sufficient capacity to transmit the energy the Scheme will generate to consumers nationally as well as into local distribution networks.

Policy	Detail	Scheme Compliance
	proposals should comply with the criteria in the first part of this policy.	The Cable Route Corridor will be located underground in the Melksham Neighbourhood Plan Area. Section 4.2 of the **Design Approach Document [EN010168/APP/7.3]** sets out the positive design outcomes that will deliver a Scheme that is sustainable and sensitive to place over the lifetime of the development. The Scheme will result in sustainable infrastructure that is sensitive to place by delivering a design that has followed the mitigation hierarchy to avoid and reduce impacts as far as possible, integrates with the landscape, provides ecological and landscape enhancements and improves recreational facilities through creation of 12.8 km of new permissive paths, which will be open up to 365 days per calendar year throughout the proposed 60-year operational lifetime of the Scheme. This **Design Principles and Parameters [EN010168/APP/7.3]** sets out the design principles and parameters by which the Scheme has been designed and the Environmental Impact Assessment has been undertaken. The design principles have informed the parameters, as set out in **Design Principles and Parameters [EN010168/APP/7.4]**. The parameters contained within the **Design Principles and Parameters [EN010168/APP/7.4]** are secured under Requirement 5 (detailed design approval) in the **Draft DCO [EN010168/APP/3.1]** and apply to the detailed design of the Scheme, post consent. Section 3.5 of the **Design Approach Document [EN010168/APP/7.3]** sets out how the local landscape

Policy	Detail	Scheme Compliance
		context and historic context were considered from an early stage in the design process to inform the adoption of design principles that result in a Scheme sympathetic to the landscape and historic setting of the area. Design Principle 1 sets out how the Scheme is 'landscape led' and gives due weight to the intrinsic character and beauty of the surrounding countryside, while Design Principle 7 sets out that the design of the Scheme will be sensitive to above and below ground heritage assets and their setting, by locating infrastructure at a suitable distance and through appropriate landscape screening. **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 and **ES Volume 1, Chapter 14: Noise and Vibration [EN010168/APP/6.1]** provides an assessment of noise impacts. Following the implementation of mitigation measures detailed within the **Outline CEMP [EN010168/APP/7.12]**, the **Outline CTMP [EN010168/APP/7.22]**, the **Outline Battery Safety Management Plan [EN010168/APP/7.21]**, the **Outline OEMP [EN010168/APP/7.13]**, and the **Outline Decommissioning Strategy [EN010168/APP/7.14]**, there are no significant effects anticipated from the construction, operation (including maintenance) and decommissioning of the Scheme on air quality or noise. These will be secured by Requirements in Schedule 2 of the **Draft DCO [EN010168/APP/3.1].**

Policy	Detail	Scheme Compliance
		As stated in Section 8 of the **Planning Statement [EN010168/APP/7.2]**, the Scheme demonstrates compliance with this policy on the basis that no detrimental impacts on amenity are envisaged as a result of dust, odour and artificial light. Section 8 also set out how safety has been considered for the Scheme. **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** section 20.7 sets out an assessment of the likely effects related to major accidents and disasters which are relevant to the Scheme, notably risks regarding: flooding; building failure, fire and associated explosions; air quality events; rail accidents; road accidents; aviation incidents; damage to/cut off of utilities; unstable ground conditions; and plant disease. The Scheme has been designed, as far as practicable, to avoid and reduce impacts and effects on major accidents and disasters, including measures such as siting vulnerable infrastructure away from areas at greater risk of flooding, and incorporating fire suppression into the design of the BESS containers. Mitigation measures have also been incorporated into how the Scheme will be constructed, operated and maintained and decommissioned to manage and minimise environmental effects, as set out in the **Outline CEMP [EN010168/APP/7.12]; Outline OEMP [EN010168/APP/7.13]; Outline Decommissioning Strategy [EN010168/APP/7.14]; Outline Battery Safety Management Plan [EN010168/APP/7.21]; Outline CTMP [EN010168/APP/7.22];** and **ES**

Policy	Detail	Scheme Compliance
		Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategy [EN010168/APP/6.3]. These measures include, but are not limited to, minimising spills, applying relevant offsets from sensitive receptors and utilities, and preparation of relevant risk assessments prior to construction. The implementation of these plans will be secured via a Requirement in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**. Following the implementation of the design measures described in Section 20.7.44 of **ES Volume 1, Chapter 20: Other Environmental Matters [EN010168/APP/6.1]** and the application of management plans submitted as part of the application, the assessment concludes all major accident and disaster risk events associated with the construction, operation and maintenance, and decommissioning phases of the Scheme can be appropriately mitigated and therefore no likely significant major accident and disaster effects are predicted to arise. **ES Volume, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** provides an assessment of the likely significant effects of the Scheme on features of nature conservation. Following the mitigation measure set out in the **Outline EPMS [EN010168/APP/7.19]** and the **Outline LEMP [EN010168/APP/7.18]**, significant effects are anticipated on hedgerows within the Cable Route Corridor through temporary loss of habitat. However, the residual significant adverse effects are limited to site and local level and are far

Policy	Detail	Scheme Compliance
		outweighed by the residual significant beneficial effects anticipated in relation to ecological enhancements proposed, together with the overwhelming need for and other benefits of the Scheme. The Scheme includes BESS as associated development which allows the Scheme to help store surplus electricity to be released at times of higher demand, thereby providing flexibility and supporting the transition to a fully low carbon electricity system. Further information on the BESS can be found in **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1].**
Policy 3: Flood Risk and Natural Flood Management	Natural flood management works to conserve and enhance the ecological flood storage value of the water environment, including watercourse corridors and catchments, will be supported. Development proposals in locations with known flooding issues should include appropriate mitigation and construction methods, and, where appropriate, contributions towards wider catchment projects. As appropriate to their scale, nature and location, development proposals should demonstrate how flood risk is mitigated. This approach should include measures to reduce the amount of rainwater run-off and	As shown on **ES Volume 2, Figure 11-8: Lime Down Cable Route Flood Risk Map [EN010168/APP/6.2]** the vast majority of the Cable Route Corridor is located in Flood Zone 1, except areas of Flood Zone 2 and 3 which are present to the far south near Melksham Substation, along the various tributaries associated with the River Avon. The Cable Route Corridor passes through or comes in close proximity to many watercourses. The crossing of watercourses will be implemented by Horizontal Directional Drilling in some locations which will allow the Cable Route to be constructed underneath the watercourses without impacting the watercourse or increasing flood risk. Other crossings will be in the form of open trench crossings.

Policy	Detail	Scheme Compliance
		The risk of flooding from all sources has been assessed and the flood risk to the Cable Route Corridor is considered to be Negligible to Low and therefore does not require Site-specific mitigation measures. The Scheme, as a whole, is not anticipated to increase the risk of flooding elsewhere, because: • The design of the Solar PV Panels and mounting structures will allow flood water to flow freely underneath. Potential for erosion where water drips from the Solar PV Panels is mitigated by the grassland planting beneath the panels. Therefore, the Solar PV Panels are not expected to increase flooding elsewhere; • Smaller electrical infrastructure associated with the Solar PV Panels will be sited on concrete pads, surrounded by gravel filled filter trenches, to replace the loss of natural infiltration caused by the concrete bases themselves; For the BESS Area at Lime Down D (which includes 132kV and 400kV substations and incorporates an impermeable area of 63,715 m²), a Drainage Strategy has been provided within **ES Volume 3, Appendix 11.6: Flood Risk Assessment and Drainage Strategy – Lime Down D [EN010168/APP/6.3]** to address the increase in hardstanding resulting from the facilities. For areas with increased hardstanding, the peak surface water discharge rate will be limited to the existing 1 in 2 year greenfield runoff rate

Policy	Detail	Scheme Compliance
		with a 30% betterment provided. This is a significant betterment of surface water runoff rates generated during a 1 in 2 year storm event at these Sites, in line with NPS EN-1 and guidance received from Wiltshire Council Lead Local Flood Authority; • Access tracks will be designed to be permeable, allowing surface water to percolate into the ground below; The Interconnecting Cables and Grid Connection Cables will be underground once constructed, and therefore will not increase the risk of flooding; and • Temporary increases in the risk of flooding from the Scheme during construction have been addressed by embedded and additional mitigation. SuDS are proposed as part of the Scheme but as set out in **ES Volume 3, Appendix 11-9: Flood Risk Assessment and Drainage Strategy – Cable Route Corridor [EN010168/APP/6.3]** however, the Grid Connection Cables are to be located within the Cable Route Corridor, and given they will be underground there will be no loss of floodplain volume as a result of the Scheme and no increase in flood risk elsewhere. The above ground works during the construction phase will be mitigated through the implementation of the **Outline CEMP [EN010168/APP/7.12]**, detailed in **ES Volume 3, Appendix 11-1: Flood Risk Assessment and Drainage Strategy – Covering Report [EN010168/APP/6.3].** Therefore, given the nature of

Policy	Detail	Scheme Compliance
		the Grid Connection Cables to be located within the Cable Route Corridor, no formal drainage is required in this area of the Scheme. The construction of the cable route will include several watercourse crossings which are described within **ES Volume 3, Appendix 11-9: Flood Risk Assessment and Drainage Strategy - Lime Down Cable Route Corridor [EN010168/APP/6.3]**. While works would ordinarily require Flood Risk Activity Permits from the Environment Agency and Land Drainage Consents from the Lead Local Flood Authority, it is intended that these requirements be disapplied through the Development Consent Order. Protective provisions have been included in the **Draft DCO [EN010168/APP/3.1]** to ensure that both the EA and LLFA retain oversight and control over the proposed works where relevant.
Policy 5: Community Engagement	Development proposals should be prepared with early, proactive, proportionate and effective engagement. Developers are therefore encouraged to follow the approach set out in the Melksham Community Engagement Protocol and the Wiltshire Council Statement of Community Involvement.	The **Consultation Report [EN010168/APP/5.1]** and the **Consultation Report Appendices [EN010168/APP/5.2]** set out the consultation undertaken with a range of stakeholders, interested parties and members of the public. This includes with the Melksham without North & Shurngold Councillor and Wiltshire Council. Non-statutory consultation for the Scheme ran from 14 March 2024 to 26 April 2024 and statutory consultation ran from 19 January 2025 to 19 January 2025. This further informed the design of the Scheme as set out in

Policy	Detail	Scheme Compliance
		the **Design Approach Document [EN010168/APP/7.3]**.
Policy 11: Sustainable Transport and Active Travel	As appropriate to their scale, nature and location, development proposals should complement the Sustainable Transport Hierarchy, including provision for ultra-low emission vehicles. Proposals for major development should demonstrate through a proportionate Travel Plan how sustainable transport modes are maximised and that safe and suitable movement can be achieved for all people. As a key element in the local sustainable transport network, proposals that would achieve further improvements to the accessibility and quality of the links between the wider town and Melksham railway station will be supported. Improvements to the quality of the public realm around the station will also be supported.	An **Outline Construction Worker Travel Plan (CWTP)** has also been prepared as part of the **Outline CTMP [EN010168/APP/7.22]** and will be secured through a Requirement in the **Draft DCO [EN010168/APP/3.1**]. This includes measures to encourage travel to the site via sustainable travel where possible including measures for the provision of shuttle buses to transport construction workers to and from the Order Limits. This is particularly important for non-local workers, who are expected to stay in local accommodation and be transported to the Order Limits. It will also be utilised by other workers as appropriate. It is expected that the shuttle bus will be able to accommodate 20 workers on average (shuttle buses are likely to be varying size). In addition, workers who drive will be encouraged to car share where practicable. The **Outline CTMP [EN010168/APP/7.22]** also ensures the safe movement of construction workers and the local community. 3 PRoWs cross the Cable Route Corridor within this Plan Area, MELW77, MELW85, and MELW84. It is anticipated that PRoWs that cross the Cable Route Corridor will generally remain open with only PRoW GRIT20 to be temporarily diverted for the duration of the construction phase. Throughout the construction

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		phase PRoW may be closed to users for short periods of time, although this will not affect all PRoW ,and where PRoW are affected works will be undertaken overnight as far as practicable. Details of the measures and temporary diversions and closures of PRoW in the Cable Route Corridor can be found in Section 3.3 of the **Outline PRoW and Permissive Paths Management Plan [EN010168/APP/7.17]**. There may be the requirement for some very temporary closures or diversions when the Grid Connection Cables are installed. This will not likely last more than a day and alternate routes will be provided. If a temporary closure/diversion of a PRoW is required, this will be for a short period and appropriately managed in consultation with the local highway authority. The **Outline PRoW and Permissive Paths Management Plan [EN010168/APP/7.17]** comprises embedded mitigation and will provide management measures, such as limiting speeds to 5-10 mph on internal access roads crossed by PRoW; repairing damage to PRoW as soon as practicable; and temporarily diverting PRoW when required, to ensure the effects of the construction phase on PRoW users is minimised. With the embedded mitigation in place, the effects are considered to be not significant.
Policy 12: Green and Blue Infrastructure	Development that will result in the creation of new Green and Blue Infrastructure (GBI) and/or contribute to the protection, management, enhancement and connectivity of existing GBI will be supported; the potential for GBI within the Neighbourhood Area is illustrated diagrammatically in Figure 12.	Broadleaved plantation woodlands fringe the northern and northwestern areas of the Existing National Grid Melksham Substation and construction access will pass through these woodlands. However, there are well established hardstanding access tracks already present through these woodlands for access to the

Policy	Detail	Scheme Compliance
	Proposals for major developments must: a. identify the existing GBI within and around the development site, and b. demonstrate how GBI has been incorporated into the proposal, and c. assess and address how the proposal will benefit the function and connectivity of GBI through the site and beyond.	substation, and construction access will make use of these existing access points (**ES, Volume 1, Chapter 13 Transport and Access [EN010168/APP/6.1]**). As such, no loss of these woodlands is anticipated. The **Outline LEMP [EN010168/APP/7.18]** outlines that the Scheme proposes to deliver substantial new hedgerow and tree planting, reinforcement planting at existing hedgerows and field boundaries, and extensive grassland habitat creation across the Order Limits. This includes connective woodland planting; mixed grassland/wildflower planting; enhanced riparian native planting; reinforced road-side screening; hedgerow reinforcement and enhancements to ponds. **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** concludes that significant effects are anticipated to hedgerows within the Cable Route Corridor, where it is anticipated there will be temporary loss of habitat as a result of the Scheme. However, the residual significant adverse effect is short term in nature and limited to a local level. Further, the Scheme incorporates a number of enhancements to improve upon the current environment, resulting in a number of significant beneficial effects. These are set out in further detail in Table 9-13 of **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]**. These include (but are not limited to): • Overall significant beneficial effects at local level on grassland and various species as a result of the reversion of the arable fields which

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		currently dominate the Solar PV Sites to grassland for the lifetime of the Scheme; • Significant long term beneficial effects at local level relation to hedgerow and woodland habitats (as discussed in the previous section), as a result of the proposed hedgerow, woodland and tree planting outlined in the **Outline LEMP [EN010168/APP/7.18]**; • A significant beneficial effect at site-to-local level on the extent of standing water habitat as a result of the creation of new ponds. Details of the proposed ponds are set out in **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2]** and measures for their creation are set out in the **Outline LEMP [EN010168/APP/7.18]**; and • A significant beneficial effect at site level on the quality of the local ditch and watercourse network.
Policy 13: Biodiversity	Development proposals, including those for field based solar farms. will be expected to deliver at least a 10% improvement in biodiversity value within and, where appropriate, beyond the site in order to deliver tangible benefits for biodiversity, including specific attention for protected species. Proposals which deliver a higher Biodiversity Net Gain will be particularly supported. Where appropriate, development proposals should demonstrate sensitive responses to statutory and non-	The **Design Approach Document [EN010168/APP/7.3]** summarises how the design for the Scheme has evolved iteratively, in line with the Scheme's design principles, including the design principle to achieve a minimum of 10% net gain for biodiversity through strategic habitat creation and enhancements measures. The **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]** sets out how a minimum of 10% net gain will be achieved for the Scheme (using the

Policy	Detail	Scheme Compliance
	statutory nature conservation sites (as shown on Figure 13), such as accommodating a buffer zone.	Defra Statutory Biodiversity Metric). This sets out the net gains in biodiversity that the Scheme will provide. The Scheme will deliver, as a minimum, 10% BNG, which is secured via Requirement 9 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**. The **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]** indicates that BNG in excess of 10% will be achieved, with a total net gain of 63.80% for area habitat units, 19.35% for hedgerow units and 25.30% for watercourse units in relation to the Solar PV Sites. The total net gain for the whole Scheme (i.e. Solar PV Sites and Cable Route Corridor combined) is 34.75% for area habitat units, 12.31% for hedgerow units and 20.08% for watercourse units, as set out in the **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]**. A minimum of 10% biodiversity net gain is secured via Requirement 9 under Schedule 2 in the **Draft DCO [EN010168/APP/3.1]**. No statutory or non-statutory nature conservation sites, as identified in **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1],** within the Neighbourhood Area will be impacted by the Scheme.
Policy 14: Open Spaces	Development proposals that involve the whole or partial loss of an existing open space (other than the designated Local Green Spaces) should demonstrate through an assessment of open space provision, using	The Scheme will not lead to the whole or partial loss of any open space as designated under the Melksham Neighbourhood Plan.

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	the quantity and access standards for open space as set out by Wiltshire Council, that: a. there is a surplus in the catchment area of open space beyond that required to meet both current and forecast need, and full consideration has been given to all functions that the open space performs, or b. that a replacement open space (or enhancement of the remainder of the existing site) provides a net benefit to the community in terms of the quantity, quality and accessibility of the open space including by walking and cycling.	
Policy 15: Community Facilities	1. Development proposals that involve the loss, in whole or part, of a community facility (as identified in Figure 14a, b & c, and detailed in the Community Facilities Report) must demonstrate that: a. adequate alternative provision exists or will be provided in an equally accessible or more accessible location, including by walking and cycling, within the catchment area of the facility; or a. it would not be economically viable, feasible or practicable to retain the building or site for use as a community facility; redevelopment for noncommunity use will only be considered as a last resort and where all other options have been exhausted.	**ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1]** presents the findings of an assessment of the likely significant effects on socio-economics, tourism and recreation as a result of the Scheme. **ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1]** considers the potential impacts on Whitley Golf Club given the Cable Route Corridor includes part of the tee-off area for Hole 2/11. Embedded safety measures will ensure Scheme construction workers and golf players are suitably separated by temporary barriers. Subject to detailed design of the finalised Grid Connection Cable routing, and in co-ordination with the operators of Whitley Golf Club, the tee-off areas for Hole 2/11 may if required be temporarily moved to ensure the use of the facility is not interrupted. In considering the overall significance of effect to the assessed organised

Policy	Detail	Scheme Compliance
	2. Proposals for new community facilities in the Plan area will be supported where the applicant can demonstrate the need and benefits of the proposed facility, or where replacement or enhanced facilities are proposed as mitigation against the loss of any community facilities within the Plan area. 3. New or replacement community facilities should be located where there is a choice of travel options and should be accessible to all members of the community.	recreational sports grounds across the 2 km and 5 km Study Areas (dependant on local or regional importance), the resultant significance of effect to their recreational use is a medium-term temporary minor adverse effect (not significant).
Policy 16: Designation of Local Green Spaces	The sites shown on figure 15, and listed on page 95, are designated as Local Green Spaces. Development proposals within the identified LGSs will only be supported in very special circumstances.	The Scheme is not located within any of the Local Green Spaces identified on Figure 15 and will therefore not have any adverse impacts on these.
Policy 17: Trees and Hedgerows	**1. Ancient and Veteran Trees:** To be supported, development proposals should ensure that there will be no loss or deterioration of the irreplaceable habitats of ancient woodlands (as shown in Figure 12) and ancient or veteran trees found outside ancient woodland, unless the need for and benefits of the development in that location clearly outweigh the loss. In accordance with current guidance a minimum buffer of at least 15 metres in width should be maintained between ancient woodland and any development boundary. A buffer zone around an	**ES Volume 1, Chapter 10: Arboriculture [EN010168/APP/6.1]** sets out the likely significant effect of the Scheme on ancient and veteran trees, other trees, and hedgerows. No ancient or veteran trees will be impacted by the development of the Cable Route Corridor in this location. Some tree removals may be required in the Cable Route Corridor, but this will preferentially target trees of lower quality and no ancient or veteran trees will be removed from the Cable Route Corridor. Mitigation including buffers have been incorporated into the Scheme and are set out in the **Outline LEMP [EN010168/APP/7.18]**. This

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	ancient or veteran tree should be at least 15 times larger than the diameter of the tree. **2. Other Existing Trees and Hedgerows:** To be supported, development proposals should ensure that there is no damage to or loss of trees of good arboricultural and amenity value. Existing trees and hedgerows on development sites should be retained where possible and incorporated as placemaking features in new development. Where there is an unavoidable loss of trees on site, the number and type of replacement trees should be informed by the quality and size of trees lost. Integration of existing hedgerows into private curtilage must be avoided where possible. **3. Increased Tree Canopy:** Wherever practicable, development proposals on sites outside of the town centre, and greater than 0.5 ha in size, should deliver an increase in site tree canopy cover. This should be demonstrated through a tree planting plan, and should be delivered through the retention of existing trees and /or the planting of new trees in public areas and in private gardens. Where this approach is not practicable, other green infrastructure features (such as green roofs) appropriate to the site should be provided.	includes a 15m buffer for ancient woodlands from the edge of the woodland and for ancient and veteran trees, a buffer zone of either 15 times the stem diameter of the tree or 5m greater than the canopy spread, whichever is greater. **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** outlines that following additional mitigation proposed (such as 25.17 km of new hedgerow and line of tree planting incorporated into the Scheme within the Solar PV Sites in order to compensate for any losses anticipated across the Order Limits.), there will be a short term, limited significant effect on hedgerows within the Cable Route Corridor through loss of habitat during construction and decommissioning. However, significant long term beneficial effects are anticipated at local level during operation and maintenance in relation to hedgerow and woodland habitats (as discussed in the previous section), as a result of the proposed hedgerow, woodland and tree planting set out in the **Outline LEMP [EN010168/APP/7.18]**. The **Outline LEMP [EN010168/APP/7.18]** details the new trees that are part of the proposed ecological enhancements for the Scheme. This includes: • Hedgerow Tree Planting - All newly planted hedgerows will include Select Standard trees randomly spaced between 5–9 m centres. On occasions where visual receptors are likely to see

Policy	Detail	Scheme Compliance
		visual effects in close proximity, denser tree planting of between 2–3 m centres may be adopted to provide more instant screening effects. • Woodland and Shelterbelt Planting – Trees within woodland copses and shelterbelts will be planted at 1 m centres. • Scattered Trees with Native Shrub Management – Scattered trees with native shrub planting will contribute to the mosaic of habitats proposed within the Solar PV Sites, specifically along watercourses, with the intention that this habitat will develop into woodland in the long-term. As above, selected tree and shrub species will be locally appropriate and will be positioned to avoid adverse shading impacts on panels.
Policy 18: Landscape Character	As appropriate to their scale, nature, and location, development proposals will be expected to: a. integrate natural features such as trees, hedgerows and the local river systems that contribute to both the landscape character and setting of the development; b. demonstrate that the whole scheme, including hard landscape and planting proposals, draws on local landscape characteristics and features through reference to relevant existing landscape and historic landscape assessments, supplemented by any additional site specific assessments, and	As set out in **ES Volume 1, Chapter 9: Ecology [EN010168APP/6.1]** the Scheme incorporates landscaping and ecological enhancements which are further detailed in the **Outline LEMP [EN010168/APP/7.18]**. These include substantial new hedgerow and tree planting, reinforcement planting at existing hedgerows and field boundaries, extensive grassland habitat creation and sympathetic management both within buffers and within the arrays, as well as discrete, valuable habitat creation (e.g. ponds and meadows) in appropriate locations. The Order Limits are situated within and in proximity to a number of local landscape character areas. A full baseline description is provided within **ES Volume 1,**

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	c. respond sensitively to the transition between settlement edge and countryside and maintain the separate identity of settlements; and d. conserve or enhance the character, openness, tranquility and amenity of the open countryside,	**Chapter 8: Landscape and Visual [EN010168/APP/6.1]** and associated appendices. The relevant landscape policies of the Wiltshire Core Strategy are set out in Section 8.3 of **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** and have informed the assessment. There are three local landscape character areas, as shown on **ES Volume 2, Figure 8-5-3: Local Landscape Character Areas [EN010168/APP/6.2].** The three areas are: • LCT A: Limestone Lowland - LCA A3 - Broughton Gifford Limestone Lowland; • LCT B: Clay River Floodplain - B1: Avon Clay River Floodplain; and • LCT C: Open Clay Vale - LCA C2 - Semington Open Clay Vale. It was agreed with Wiltshire Council that LCT B and LCT C could be scoped out of the assessment as they are on the fringes of the 5km Study Area and the 0.5 km Cable Route Corridor, however LCT A was scoped in and therefore informed the assessment. **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** sets out that with regard to the landscape effects of the Solar PV Sites, there would not be significant landscape effects upon the landscape fabric during construction or operation in Year 1. Once mitigation measures are established,

Policy	Detail	Scheme Compliance
		significant beneficial effects would occur during operation from Year 15 and at decommissioning through enhancement to the landscape fabric. **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** also concludes that there would be significant adverse effects in the 1km local study area during construction and in Year 1 of operation which is primarily related to the change in land use from agriculture to the Scheme. At Year 15 and decommissioning the effect reduces to not significant. With regard to the Cable Route Corridor, no significant landscape effects would occur within the Cable Route Corridor Study Area with all effects being short term and temporary in nature with cables placed underground. Further in relation to post decommissioning and the legacy landscape, **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** concludes that the site would benefit from the significantly enhanced tree and hedgerow planting that has been carried out and has matured to create a much stronger and robust landscape, retaining, and enhancing the overall character and providing considerable biodiversity benefits over the years. As a result the landscape would be left in a better condition than current day. Mitigation and enhancement measures are incorporated into the Scheme as shown within **ES Volume 2, Chapter 3: Scheme Description** and **Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2],** which forms part of the **Outline**

Policy	Detail	Scheme Compliance
		Landscape and Ecological Management Plan [EN010168/APP/7.18]. Requirement 7 of the **Draft DCO [EN010168/APP/3.1]** requires the submission and approval of a landscape and ecological management plan to be substantially in accordance with the **Outline Landscape and Ecological Management Plan [EN010168/APP/7.18]** and for the landscape and ecological management plan to be implemented as approved. These measures and controls will ensure that the detailed design of the Scheme incorporates the landscape mitigation and enhancements included within the **Outline Landscape and Ecological Management Plan [EN010168/APP/7.18]**.
Policy 19: Separation of Settlements	1. Development proposals should respect the separation between the following settlements: • Whitley and Shaw; • Shaw and Melksham; • Beanacre and Melksham; and • Berryfield and Semington. 2. Proposals for development between the settlements listed above should: a. be in conformity with development plan policies; b. demonstrate that they would deliver economic, community and/or environmental benefits which would outweigh any harm to the role and function of the area between the two settlements (individually or cumulatively)	The Scheme is not located between the any of the villages mentioned in criterion 1 of this policy, and has point of connection at the Existing National Grid Melksham Substation.

Policy	Detail	Scheme Compliance
	as set out in section 1 of this policy, and as detailed in the Green Gap and Wedge Study (2023); c. minimise and mitigate their urbanising effects, such as artificial lighting and traffic movements; and d. where practicable, retain trees and hedgerows and, as appropriate to their scale and nature, incorporate additional screening trees and hedgerows as edge features to minimise the impact of development on the separation of the settlements concerned. Development proposals which would result in the loss of, or an unacceptable reduction of the contribution which it makes to the separation of the settlements concerned will not be supported.	
Policy 20: Locally Distinctive, High Quality Design	Development proposals should contribute positively to the conservation, enhancement and extension of the quality and local distinctiveness of the neighbourhood area. In addition to having regard to the National Design Guidance and Wiltshire Design Guide, development proposals must demonstrate how they have been informed by the adopted Melksham Design Guidelines and Codes, therefore how they have responded positively to the history and character of the area in which the site is located.	The Scheme has had regard to National Design Guidance, the Wiltshire Council Design Guide, and design guidance as part of the Melksham Neighbourhood Plan as set out in the **Design Approach Document [EN010168/APP/7.3]**. The Cable Route Corridor is located underground within the Melksham Neighbourhood Plan Area. Section 4.2 of the **Design Approach Document [EN010168/APP/7.3]** sets out the positive design outcomes that will deliver a Scheme that is sustainable and sensitive to place over the lifetime of the development. The Scheme will result in sustainable

Policy	Detail	Scheme Compliance
	Proposals for major development must demonstrate through a masterplan through a Design and Access Statement how the proposed development layout, density, access proposals and building design approach complement and extend the positive characteristics of Melksham and Melksham Without's settlements and landscape, both historic and topographic.	infrastructure that is sensitive to place by delivering a design that has followed the mitigation hierarchy to avoid and reduce impacts as far as possible, integrates with the landscape, provides ecological and landscape enhancements and improves recreational facilities through the creation of 12.8 km of new permissive paths, which will be open up to 365 days per calendar year throughout the proposed 60-year operational lifetime of the Scheme.
Policy 21: Local Heritage	Proposals for development within the Melksham Conservation Area must show how they preserve or enhance the setting, characteristics and special qualities that make up the architectural and historic character. For other assets of local heritage importance, including archaeological importance, and buildings or structures identified as Non-designated Heritage Assets (as set out in the 2023 Locally Valued Non-Designated Heritage Asset Report or subsequent updates), mapped on Figure 19 (including notable buildings as shown on Figure 20) development proposals should demonstrate that appropriate consideration has been given to: a. the significance of the heritage asset; b. its most distinctive and important features; c. the elements of its setting and immediate surrounds that contribute to its significance, and d. the contribution the asset and its setting makes to the character of the local area (whether in the Conservation Area or not).	The Cable Route Corridor routes into the north of Melksham Civil Parish into National Grid Melksham Substation and is therefore not located within the Melksham Conservation Area. **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** provides an assessment of the significance of heritage assets, their settings, and contribution to the local area. Following the implementation of embedded and additional mitigation measures, no significant effects are anticipated on heritage assets within the Plan Area as a result of the Scheme. The DCO application includes a Heritage Statement (**ES Volume 3, Appendix 12-1: Heritage Statement [EN010168/APP/6.3]**). This details that Westlands Farmhouse Grade II Listed Building lies within the Cable Route Corridor within the Neighbourhood Plan Area, however the Scheme does not include any physical impacts to any of the structures within the

Policy	Detail	Scheme Compliance
	e. any planning application must not only consider heritage issues but show that they have been fully taken into account via a heritage statement. Archaeological surveys of a particular site may also be required prior to the determination of an application.	farmstead. The Cable Route Corridor also includes the fields to the south-west, south, and south-east of Westlands Farm. Construction works associated with the installation of the cable within these areas will result in some limited impact to the significance and setting of this Listed Building and wider farmstead, largely due to the movement of plant and construction noise. However, these impacts will all be temporary in nature, and it is considered that there will be no harm to the significance of Westlands Farm during construction or once construction works have finished. The Cable Route Corridor also passes through the northernmost part of the Whitley House property which contains two Grade II Listed Buildings. Construction works associated with the installation of the cable will result in some limited impact to the significance and setting of the Whitley House complex, largely due to the movement of plant and construction noise. These works will also require the short-term closure of the PRoW to the north-west of the Barn to Rear of Whitley House, as the Cable Route Corridor passes across this trackway. However, these impacts will be temporary in nature, and it is considered that there will be no harm to the significance of the Whitley House designated and non-designated heritage assets during construction or once construction works have finished. The Scheme includes heritage assets with an archaeological interest. Baseline information has been

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		collated from archaeological Desk-Based Assessments (**ES Volume 3, Appendix 12-2: Archaeological Desk-Based Assessments [EN010168/APP/6.3]**) including a geoarchaeological DBA, as well as the results of archaeological evaluation (**ES Volume 3, Appendix 12-3: Air Photo and LiDAR Mapping and Interpretation [EN010168/APP/6.3], ES Volume 3, Appendix 12- 4: Archaeological Geophysical Survey Reports [EN010168/APP/6.3]** and **ES Volume 3, Appendix 12- 5: Interim Evaluation Trial Trenching Reports [EN010168/APP/6.3]**). **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** concludes that in the absence of additional mitigation, significant effects have been identified for 17 archaeological assets. Following implementation of additional mitigation measures, the residual effect would be reduced and no significant effects would occur. Where archaeological mitigation in the form of a programme of excavation and recording will occur or re-instatement of earthworks, it is noted that physical impact will still occur to archaeological assets identified. However, the archaeological mitigation works proposed are considered sufficient to preserve the asset by record, and as such compensate for their loss. Following the implementation of additional mitigation measures outlined within **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]**, the residual effect on archaeological assets will not be significant.

Policy	Detail	Scheme Compliance
		Archaeological mitigation is secured through Requirement 12 of Schedule 2 of the **Draft DCO [EN010168/APP/3.1].**

Chippenham Without Neighbourhood Plan 2022 – 2036 (published 2023)

Policy	Detail	Scheme Compliance
Policy CWoNP – HE1	All new development within the Neighbourhood Plan Area must demonstrate good quality design by demonstrating a positive response to the local character of the historic rural landscape.	The Cable Route Corridor runs through this Plan Area and will be located underground. Section 3.5 of the **Design Approach Document [EN010168/APP/7.3]** sets out how the local landscape context and historic context were considered from an early stage of the design process to inform the adoption of design principles that result in a Scheme sympathetic to the landscape and historic setting of the area. Design Principle 1 sets out how the Scheme is 'landscape led' and gives due weight to the intrinsic character and beauty of the surrounding countryside, while Design Principle 7 sets out that the design of the Scheme will be sensitive to above and below ground heritage assets and their setting, by locating infrastructure at a suitable distance and through appropriate landscape screening.
Policy CWoNP – HE2	All new developments within the Neighbourhood Plan Area must demonstrate good quality design by responding to the local character of the historic built and natural environment.	The Cable Route Corridor runs through this Plan Area and will be located underground. The design of the Scheme as set out in Section 5.2 of the **Design Approach Document [EN010168/APP/7.3]** sets out the positive design outcomes that will deliver a Scheme that is sustainable and sensitive to place over the lifetime of the development, including outcomes such as routing construction traffic along routes to minimise impacts on conservation areas and various Listed Buildings such as Westlands Farmhouse.

Policy	Detail	Scheme Compliance
Policy CWoNP – HE3	All new developments should conserve and preserve historic assets in the Parish commensurate with their historic status.	**ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** provides an assessment of the likely significant effects on designated and non-designated heritage assets as a result of the Scheme. Barn Range at Starveall Farm and Starveall Farmhouse Grade II Listed Buildings are located in close proximity to the Cable Route Corridor which passes through Field F75, approximately 230m north and Field F73, approximately 140m east of Starveall Farm. **ES Volume 3, Appendix 12-1: Heritage Statement [EN010168/APP/6.3]** outlines that the construction works associated with the installation of the cable will result in some limited impact to the significance and setting of Starveall Farm, largely due to the movement of plant and construction noise. Likewise, these works will also require the short-term closure to traffic of Chippenham Lane to the east of the farmstead, as the Cable Route Corridor passes across this roadway. However, these impacts will be temporary in nature, and it is considered that there will be no harm to the significance of the Starveall Farm designated and non-designated heritage assets during construction or once construction works have finished.
Policy CWoNP – NE1	Where appropriate development proposals must: a. Demonstrate how proposals consider the landscape character of Allington, Sheldon and Lanhill including setting and visual impacts. b. Protect existing rights of way and link in new routes to offer the community opportunities for	**ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** presents an assessment of the Scheme's impact on the existing landscape character and its potential visual effects. As the Cable Route Corridor is underground in the Chippenham Without Neighbourhood Plan Area, the Scheme will have no

Policy	Detail	Scheme Compliance
	additional countryside access routes and cycleways where possible. c. Include landscape enhancements of appropriate species mix and character.	impacts on the local landscape character, views or setting during its operation. No significant effects have been recorded during construction and Year 1 as the effect of mitigation measures would be limited initially, taking time to become fully established. At decommissioning other than the buried cabling, all infrastructure would be removed and land returned to its original use and condition as far as practicable and returned to the landowner. The reinforced landscape however would be retained as there is an expectation that at Year 60 that there would be an equivalent of current countryside policies in place to ensure the protection of hedgerows, woodland, trees etc. Therefore, as infrastructure is removed, there would be an overall benefit to the character of the area, however it should be noted that the ongoing retention of mitigation planting cannot be assured once the land reverts back to the landowner at the conclusion of the lease.
Policy CWoNP – NE2	All new development must seek to contribute to sustainable development. Where appropriate, proposals should: a. Deliver biodiversity net gains. b. Protect geodiversity where possible. c. Adopt best practice in sustainable urban drainage.	The **Design Approach Document [EN010168/APP/7.3]** summarises how the design for the Scheme has evolved iteratively, in line with the Scheme's design principles, including the design principle to achieve a minimum of 10% net gain for biodiversity through strategic habitat creation and enhancements measures.

Policy	Detail	Scheme Compliance
		The Scheme will deliver, as a minimum, 10% BNG, which is secured via Requirement 9 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**. The **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]** indicates that BNG in excess of 10% will be achieved, with a total net gain of 63.80% for area habitat units, 19.35% for hedgerow units and 25.30% for watercourse units in relation to the Solar PV Sites. The total net gain for the whole Scheme (i.e. Solar PV Sites and Cable Route Corridor combined) is 34.75% for area habitat units, 12.31% for hedgerow units and 20.08% for watercourse units, as set out in the **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]**. SuDS are proposed as part of the Scheme but as set out in **ES Volume 3, Appendix 11-9: Flood Risk Assessment and Drainage Strategy – Cable Route Corridor [EN010168/APP/6.3]** given the nature of the Grid Connection Cables to be located within the Cable Route Corridor, no formal drainage is required in this area of the Scheme.
Policy CWoNP – BE3	Development proposals must be of a high quality which respects the Local character, and it must be demonstrated that: a. New development is of a scale that is appropriate within both its immediate context as well as the character of the local area.	As the Cable Route Corridor is underground within the Chippenham Without Neighbourhood Plan Area, there will be no adverse impacts on the character of the area, and the materials used within the Scheme within the Neighbourhood Area will not be visible.

Policy	Detail	Scheme Compliance
	b. Materials used within new developments are appropriate and respond to the local vernacular. c. The form of new development must respect the existing character of the area. d. Designated Heritage Assets and their settings must be thoroughly considered where appropriate.	**ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** presents an assessment of the Scheme's impact on the existing landscape character and its potential visual effects. As the Cable Route Corridor is underground in the Chippenham Without Neighbourhood Plan Area, the Scheme will have no impacts on the local landscape character, views or setting during its operation. No Significant effects have been recorded during construction and Year 1 as the effect of mitigation measures would be limited initially, taking time to become fully established. At decommissioning other than the buried cabling, all infrastructure would be removed and land returned to its original use and condition as far as practicable and returned to the landowner. The reinforced landscape however would be retained as there is an expectation that at Year 60 that there would be an equivalent of current countryside policies in place to ensure the protection of hedgerows, woodland, trees etc. Therefore, as infrastructure is removed, there would be an overall benefit to the character of the area, however it should be noted that the ongoing retention of mitigation planting cannot be assured once the land reverts back to the landowner at the conclusion of the lease. **ES Volume 1, Chapter 12: Cultural Heritage [EN010168/APP/6.1]** provides an assessment of the likely significant effects of designated heritage assets and their setting. It concludes that following the implementation of embedded and additional mitigation

Policy	Detail	Scheme Compliance
		measures there will be no significant effects to designated heritage assets within including within the Neighbourhood Plan Area. **ES Volume 3, Appendix 12-1: Heritage Statement [EN010168/APP/6.3]** confirms there will be no harm to designated heritage assets within the Neighbourhood Plan Area. Potential impacts were identified at the following Designated Heritage Assets in the Parish as set out in **ES Volume 3, Appendix 12-8: Cultural Heritage Impact Assessment Tables [EN010168/APP/6.3]**: • Grade II Barn Range at Starveall Farm • Grade II Cart Shed to South of Wellclose Farmhouse • Grade II Starveall Farmhouse Construction transport routes have been identified that minimise impacts on assets.
Policy CWoNP – E4	Proposals for community facilities that are of an appropriate scale will be supported. Existing community facilities are as follows: Allington Farm Shop and Café Texaco Garage and Shop Chippenham Rugby Club and Allington Cricket Club Golf Driving Range Any development proposal that would result in the loss of community facilities must clearly demonstrate that the use is not viable. Development proposals which would result in the loss of a community facility but are	**ES Chapter 16: Socio-Economic, Tourism and Recreation [EN010168/APP/6.1]** provides an assessment of the likely significant impacts of the Scheme on facilities. The assessed facilities included: • Key tourist and visitor attractions of local, regional and national importance likely to be impacted by the Scheme; • Locally and regionally important parks and nature reserves; • PRoW and long-distance walking and cycling routes; • Navigable waterways and waterbodies used for recreation;

Policy	Detail	Scheme Compliance
	able to demonstrate that the facility will be replaced in an alternative location within the Neighbourhood Plan Area will be supported.	• Recreation aviation centres; • Recreational hubs for organised sports and youth sports and play likely to be impacted by the Scheme; and • Equestrian businesses and facilities likely to be impacted by the Scheme. It confirms the Scheme would not lead to the loss of the community facilities or services as set out in this policy as no significant adverse effects on the listed facilities were found in the assessment during the construction, operation and maintenance, and decommissioning phases of the Scheme.

Corsham Neighbourhood Plan 2016 - 2026 (made 2019)

Policy	Detail	Scheme Compliance
Policy CNP E1	Otherwise acceptable proposals for development which protect and, where possible, enrich the habitat of the protected bat species associated with the Bath and Bradford on Avon Bats Special Area of Conservation (SAC) will be supported. Applicants will need to demonstrate how their proposals would contribute to the delivery of the Corsham Batscape Strategy, including details of measures to preserve and, where possible, enhance wildlife corridors, (especially with regard to foraging areas), priority flight lines and maternity roosts. Proposals that enhance the biodiversity of Corsham will be supported.	The **Habitat Regulations Assessment Report [EN010168/APP/7.10]** and **ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** conclude that there will be no significant effects to European or internally designated sites as a result of the construction, operation and maintenance, or decommissioning of the Scheme. The **Habitat Regulations Assessment Report [EN010168/APP/7.10]** provides an Appropriate Assessment that sets out mitigation measures that are proposed on the Bath and Bradford-on-Avon bats SAC during construction and decommissioning. No effects were found for Bath and Bradford-on-Avon bats SAC during the operation and maintenance phase. Section 8 of the **Habitat Regulations Assessment Report [EN010168/APP/7.10]** sets out the mitigation measures proposed as part of the Appropriate Assessment, in relation to: • Loss or change of functionally-linked land. • Fragmentation. • Loss or damage to roosts. • Killing and injury These measures, such as Biodiversity Protection Fencing used to protect all individual in-field mature

Policy	Detail	Scheme Compliance
		trees, are secured in the **Outline EPMS [EN010168/APP/7.19]**. The **Habitat Regulations Assessment Report [EN010168/APP/7.10]** concludes that with the adoption of mitigation measures, no adverse effects on site integrity of the Bath and Bradford-on-Avon Bats SAC, Severn Estuary SAC, Severn Estuary SPA or the Severn Estuary Ramsar site are deemed likely, either in isolation or in combination with other projects. The Scheme has taken opportunities to incorporate ecological and landscape enhancements such as new hedgerow and tree planting as set out in the **Outline LEMP [EN010168/APP/7.18]**. This will be secured by Requirements 7 in Schedule 2 of the **Draft DCO [EN010168/APP/3.1].** A Biodiversity Net Gain (BNG) Assessment (using the Defra Statutory Biodiversity Metric) has been produced, within the DCO application (**Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]**). This sets out the net gains in biodiversity that the Scheme will provide. The Scheme will deliver, as a minimum, 10% BNG, which is secured via Requirement 9 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**. The **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]** indicates that BNG in excess of 10% will be achieved, with a total net gain of 63.80% for area habitat units, 19.35%

Policy	Detail	Scheme Compliance
		for hedgerow units and 25.30% for watercourse units in relation to the Solar PV Sites. The total net gain for the whole Scheme (i.e. Solar PV Sites and Cable Route Corridor combined) is 34.75% for area habitat units, 12.31% for hedgerow units and 20.08% for watercourse units, as set out in the **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]**.
Policy CNP E2	All new development should seek to contribute to the achievement of sustainable development. Proposals should: a) Safeguard and, where possible, enhance biodiversity and geodiversity; b) Adopt best practice in sustainable urban drainage; c) Reduce flood risk and ensure that the design and location of new development is resilient to the effects of flooding Proposals are encouraged to demonstrate: d) Innovative design which seeks to achieve low carbon sustainable design; e) The promotion of the efficient use of natural resources, the re-use and recycling of resources, and the production and consumption of renewable energy; f) Grey water re-use; and g) The development of low and zero carbon energy through a range of technologies	The **Design Approach Document [EN010168/APP/7.3]** sets out that the Scheme has been designed to safeguard and where possible enhance biodiversity. Design principles have been adopted to inform Scheme design from the outset and include adherence to the mitigation hierarchy to reduce impacts and control any adverse effects on the environment throughout the lifecycle of the Scheme, and delivering a minimum 10% net gain for biodiversity through strategic habitat creation and enhancement measures as set out in the **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]**. As shown on **ES Volume 2, Figure 11-8: Lime Down Cable Route Flood Risk Map [EN010168/APP/6.1]** the vast majority of the Cable Route Corridor is located in Flood Zone 1, except along the various tributaries associated with the River Avon. **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [EN010168/APP/6.1]** concludes that the Cable Route is considered to be at low risk of fluvial flooding as it is below ground and inherently resilient to above ground flooding. **ES Volume 1, Chapter 11: Hydrology,**

Policy	Detail	Scheme Compliance
		Flood Risk and Drainage [EN010168/APP/6.1] also concludes that the overall risk of surface water flooding at the Cable Route Corridor is considered very low. SuDS are proposed as part of the Scheme but as set out in **ES Volume 3, Appendix 11-9: Flood Risk Assessment and Drainage Strategy – Cable Route Corridor [EN010168/APP/6.3]** given the nature of the Grid Connection Cables to be located within the Cable Route Corridor, no formal drainage is required in this area of the Scheme. **ES Volume 1, Chapter 3: The Scheme [EN010168/APP/6.1]** sets out that the Scheme comprises a solar PV electricity generating station that will produce over 100 MW of electricity and will retain a degree of flexibility to enable it to adapt over time, be functional and fit for purpose, and respond to innovative and new technologies.
Policy CNP E3	Development proposals should protect, conserve and where possible enhance the special qualities of the Cotswold AONB and the distinctive characteristics of the Landscape Setting of the Corsham Rolling Lowlands. Development should: a) Maintain existing woodland cover and hedge trees wherever possible; b) Restore field boundaries around settlements where there is gapping or degradation wherever possible;	**ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1]** presents an assessment of the Scheme's impact on the existing landscape character and its potential visual effects. The Cable Route Corridor is located within this Neighbourhood Plan Area and will be located underground. Therefore, there would be no impact on the Cotswold National Landscape or the distinctive characteristics of the Landscape Setting of the Corsham Rolling Lowlands as a result of the Cable Route Corridor.

Policy	Detail	Scheme Compliance
	c) Demonstrate how the proposal relates to Corsham in terms of landscape, setting and visual effects; d) Create new woodland cover where necessary to mitigate the landscape or visual impact of new development; and e) Protect existing Public Rights of Way and link in new routes to offer local people recreational opportunities in terms of countryside access routes and cycleways. All proposed landscaping must be of an appropriate species mix and of local provenance.	The majority of the Scheme is located outside of the Cotswold National Landscape (CNL). A very small section (2.16 ha) of the Scheme is located within the CNL and parts of Lime Down A, B and C are considered to be in the setting of the CNL. The works within the CNL comprise minor highway works to facilitate construction traffic. **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]** sets out the alternative construction routes that were considered, and concludes that the proposed construction route through the CNL is considered to be the least constrained in terms of both meeting the needs of the Scheme and minimising environmental effects. As set out in the **Design Approach Document [EN010168/APP/7.3]** the Applicant has sought to reduce adverse impacts on the CNL by removing a number of fields from the Order Limits in areas near the CNL and also removing panels from fields in Lime Down A, B and C closest to the CNL. The Applicant has adopted a “landscape led” approach to design, giving due weight to the intrinsic character and beauty of the surrounding countryside (discussed in the **Design Approach Document [EN010168/APP/7.3**]). The proposed landscaping design is set out in **ES Volume 2, Figure 3-4:**

Policy	Detail	Scheme Compliance
		Landscape and Ecology Mitigation Plan [EN010168/APP/6.2]. **ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswold National Landscape and its Special Qualities [EN010168/APP/6.3]** provides a standalone assessment of the effects of the Scheme on the CNL and its Special Qualities. The landscape and visual effects of the Scheme on the CNL and its Special Qualities have been mitigated throughout the landscape led, iterative design process that has been undertaken which has been informed by the Cotswold Nature Recovery Plan and in consultation with officers at the CNL Board and Wiltshire Council. Embedded mitigation measures relating to the CNL include: • avoidance measures through the use of significant buffers for areas of the Scheme within the setting of the CNL and to maintain views. • protection of the existing landscape through buffers and offsets. • Retention and enhancement of the existing landscape framework including new planting and the re-establishment of historic hedgerows within the setting of the CNL, new areas of native woodland, trees, scrub and grassland, new planting within riparian corridors to enhance rivers and wetland, as well the restoration of dry-stone walls and creation of new ponds. • Positive enhancements to further the purpose of the CNL including, the creation of wildflower

Policy	Detail	Scheme Compliance
		meadows, wildflower meadow verges and maintaining hedgerows at their current height to maintain open view of the landscape. **ES Volume 3, Appendix 8-6 Assessment of Effects on the Cotswold National Landscape and its Special Qualities [EN010168/APP/6.3]** concludes that there are no significant direct effects on the CNL or its Special Qualities. As stated in **ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1],** with regard to field boundaries, the field boundaries and the associated tree cover including adjacent woodlands would remain intact and help with visual layering of vegetation across the landscape and the integration of the Scheme within the landscape as it is constructed. There will be retention of existing woodland/scrub and hedgerow cover (other than where required for access). This vegetation provides a strong visual framework and potentially screens or substantially filters views at ground level towards the Scheme. Existing hedgerows are to be allowed to grow out and will be managed to a height of 4.5m. Hedgerow trees will be encouraged to grow out to add further thickening and growth to field boundaries. This new planting provides long term screening, structural benefits to the landscape and wider Green Infrastructure and habitat connectivity benefits.

Policy	Detail	Scheme Compliance
		ES Volume 1, Chapter 8: Landscape and Visual [EN010168/APP/6.1] also sets out there would be retention of existing woodland/scrub and hedgerow cover along recreational routes. Public Rights of Way (PRoW) would be buffered with 15m to proposed fence lines to allow for establishment of existing hedgerows or woodland cover to each side. New planting would screen certain views for users of the PRoWs, the bridleway network, and local roads and new native hedgerow planting to field boundaries with hedgerow trees added to further screen views. Where PRoW cross the Sites, space has been given (15m each side) to retain openness and allow for creation of landscaped corridors. These embedded mitigation and enhancement measures are incorporated into the Scheme as shown within **ES Volume 2, Chapter 3: Scheme Description** and **Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2],** which forms part of the **Outline Landscape and Ecological Management Plan [EN010168/APP/7.18]**. Requirement 7 of the **Draft DCO [EN010168/APP/3.1]** requires the submission and approval of a landscape and ecological management plan to be substantially in accordance with the **Outline Landscape and Ecological Management Plan [EN010168/APP/7.18]** and for the landscape and ecological management plan to be implemented as approved. These measures and controls will ensure that the detailed design of the Scheme incorporates the landscape mitigation and

Policy	Detail	Scheme Compliance
		enhancements included within the **Outline Landscape and Ecological Management Plan [EN010168/APP/7.18]**.
Policy CNP E4	Development that results in the loss of green infrastructure identified on Figure 5 (on page 28) or that results in any harm to their character, setting, appearance, general quality or amenity value would only be permitted if, as a minimum, the community would gain equivalent benefit from the provision of suitable replacement green infrastructure.	**ES Volume 1, Chapter 9: Ecology and Biodiversity [EN010168/APP/6.1]** concludes that significant effects are anticipated on hedgerows within the Cable Route Corridor through temporary loss of habitat. This is due to the temporary loss of habitat within the Cable Route Corridor and the displacement of ground-nesting birds (e.g. skylark) from Solar PV Sites. However, the residual significant adverse effects are limited to site and local level and are far outweighed by the residual significant beneficial effects anticipated in relation to habitats and other species, together with the overwhelming need for and other benefits of the Scheme. These beneficial effects on green infrastructure include: • Overall significant beneficial effects at local level on grassland and various species as a result of the reversion of the arable fields which currently dominate the Solar PV Sites to grassland for the lifetime of the Scheme; • Significant long term beneficial effects at local level relation to hedgerow and woodland habitats, as a result of the proposed hedgerow, woodland and tree planting outlined in the **Outline LEMP [EN010168/APP/7.18]**;

Policy	Detail	Scheme Compliance
		• A significant beneficial effect at site-to-local level on the extent of standing water habitat as a result of the creation of new ponds. Details of the proposed ponds are set out in **ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [EN010168/APP/6.2]** and measures for their creation are set out in the **Outline LEMP [EN010168/APP/7.18]**; and • A significant beneficial effect at site level on the quality of the local ditch and watercourse network.
Policy CNP HW1	Development proposals should seek to protect, improve and extend Corsham's green infrastructure network as identified on Figure 5 (on page 28) to support a healthy community. Innovative proposals that contribute to sustainable pedestrian/cyclist linkages between the town and its rural setting will be supported.	The Scheme has taken opportunities to incorporate ecological and landscape enhancements such as new hedgerow and tree planting as set out in the **Outline LEMP [EN010168/APP/7.18]**. The Scheme will deliver, as a minimum, 10% BNG, which is secured via Requirement 9 in Schedule 2 to the **Draft DCO [EN010168/APP/3.1]**. The **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]** indicates that BNG in excess of 10% will be achieved, with a total net gain of 63.80% for area habitat units, 19.35% for hedgerow units and 25.30% for watercourse units in relation to the Solar PV Sites. The total net gain for the whole Scheme (i.e. Solar PV Sites and Cable Route Corridor combined) is 34.75% for area habitat units, 12.31% for hedgerow units and 20.08% for watercourse units, as set out in the **Biodiversity Net Gain Assessment Report [EN010168/APP/7.8]**.

Policy	Detail	Scheme Compliance
		10 PRoWs cross the Cable Route Corridor in this Neighbourhood Plan Area. It is anticipated that PRoWs that cross the Cable Route Corridor will generally remain open. As set out in Section 3.3 of the **Outline PRoW and Permissive Paths Management Plan [EN010168/APP/7.17]** only PRoW GRIT20 will be temporarily diverted for the duration of the construction phase. Other PRoW within the Cable Route Corridor will be temporarily closed for short periods during this time, although the closures will not affect all PRoW and works done will be undertaken overnight as far as practicable with prior notices of closures sent to PRoW officers at the local highway authority as far as practicable. There may be the requirement for some very temporary closures or diversions when the Grid Connection Cables are installed. This will not likely last more than a day and alternate routes will be provided. If a temporary closure/diversion of a PRoW is required, this will be for a short period and appropriately managed in consultation with the local highway authority. An **Outline PRoW and Permissive Paths Management Plan [EN010168/APP/7.17]** will provide management measures to ensure the effects of the construction phase on PRoW users is minimised, through measures such as appropriate signage installed along the PRoW to make PRoW users aware of the construction activity, and the provision of banksmen to hold vehicles if a PRoW user is present and advise PRoW users of the potential for construction vehicles to be present. With the

Policy	Detail	Scheme Compliance
		embedded mitigation in place, the effects are considered to be not significant. The Scheme includes the creation of new 12.8 km of new non-vehicular permissive paths, which will be open up to 365 days per calendar year throughout the proposed 60-year operational lifetime of the Scheme to provide pedestrians and horse and bicycle riders improved accessibility to the countryside and improved connectivity of the wider PRoW network. The permissive paths will provide a beneficial impact on PROW use for local users and visitors through mitigating adverse impacts on other PROWs and providing alternative access routes to the use of the local highway network. The design and implementation of the proposed permissive paths is set out in the **Outline PRoW Public Rights of Way and Permissive Paths Management Plan [EN010168/APP/7.17]** and are secured under Requirement 16 in Schedule 2 of the **Draft Development Consent Order [EN010168/APP/3.1]**. When implemented, these measures will enhance connectivity in the local area for recreation purposes, secondarily benefitting local population health and wellbeing in the long-term.
Policy CNP HW3	Community green space (including formal and informal sports pitches) identified in Figure 5 (on page 28 and shown in more detail on Maps A1 to A4 in Appendix 2) will be safeguarded and enhanced through new development proposals. Developers must engage with	The Scheme has been designed, as far as practicable, to avoid and reduce impacts and effects on recreation through the process of embedding measures into the design. In addition, how the Scheme is constructed, operated and maintained, and decommissioned would

Policy	Detail	Scheme Compliance
	Corsham Town Council at an early opportunity to discuss and potentially secure the long-term management of the open spaces in the public interest.	be controlled in order to manage and minimise potential environmental effects (required as a result of legislative requirements and/or standard sectoral practices). The full list of embedded mitigation measures are set out in Section 16.9 **of ES Volume 1, Chapter 16: Socio-Economics, Tourism and Recreation [EN010168/APP/6.1]**. As per the assessment in the same Chapter, the Cable Route Corridor within this Neighbourhood Plan Area will not lead to the loss of any community green space.
Policy CNP HE1	All new development within the Corsham Neighbourhood Plan Area must demonstrate good quality design. This means responding to and integrating with local surroundings and landscape context as well as the existing built environment. Good design for Corsham means: a) Achieving high quality design that respects the scale, character and historic built fabric of existing and surrounding buildings; b) Respecting established building plot arrangements, widths and architectural rhythm of the street scene including front gardens, railings,walls and hedges; c) Establishing 'gateways' into the town (shown in Figure 10 on page 34) at; i. Cross Keys, ii. Pickwick, iii. Pound Pill, to reinforce the identity of the historic centre and enhance the visitor awareness and experience;	The design evolution of the Scheme is detailed in the **Design Approach Document [EN010168/APP/7/3]** and **Chapter 4: Alternatives and Design Evolution [EN010168/APP/6.1]**. The **Design Approach Document [EN010168/APP/7/3]** explains how good design has been embedded in the design of the Scheme. Given the Scheme in this Neighbourhood Plan Area comprises the Cable Route Corridor and it will be located underground, there will not be a conflict with the design principles outlined within this policy as, by virtue of being underground, the Cable Route Corridor will integrate with local surroundings and landscape context as well as the existing built environment (including existing scale, character and historic built fabric).

Policy	Detail	Scheme Compliance
	d) Using good quality materials that complement the existing historic vernacular of Corsham whilst respecting the individual context of each proposal; and e) Taking into account the key views identified in Figures 12 and 13 and ensuring that any development within these views respects the key features of the views. Planning permission will not be granted for development that undermines these core design principles and fails to improve the form and function of the Corsham Neighbourhood Plan Area.	
Policy CNP T1	Development proposals that generate a significant amount of traffic movement must be accompanied by evidence that sets out the transport issues relating to the development including the measures to be taken to deal with the anticipated transport impacts of the scheme. If the impact cannot be satisfactorily mitigated the proposal will be resisted	The Applicant has assessed the impacts of traffic and transport from the Scheme, including the suitability of access roads as set out in **ES Volume 1, Chapter 13: Transport and Access [EN010168/APP/6.1]**. An **Outline CTMP [EN010168/APP/7.22]** has been prepared and will be secured via Requirement 15 in the **Draft DCO [EN010168/APP/3.1]**. The CTMP provides a framework for the management of construction vehicle movements to and from the Scheme, to ensure that the effects of the temporary construction phase on the local highway network are minimised. The **Outline CTMP [EN010168/APP/7.22]** sets out construction access arrangements, construction vehicle routing, construction vehicle trip generation, and the management/mitigation measures.

Lime Down
Solar Park

Annex C : Sequential and Exception Test

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Executive Summary

E-1. The purpose of this report is to explain how the Sequential and Exception Tests have been applied by the Applicant in its assessment of alternative sites for the Scheme and in its design of the Solar PV Sites.

E-2. The report sets out how the Sequential Test has been incorporated into the overall methodology for site selection for the Solar PV Sites for the Scheme, including a preference to use sites within Flood Zone 1, before widening the search to include areas of Flood Zones 2 and 3. It also includes a more detailed assessment of each potential development area and provides a scoring for each of the main sources of flooding.

E-3. On a site level, the report sets out the application of the Sequential Test in the design of the Solar PV Sites and how more vulnerable infrastructure has been located in areas at lower risk of flooding. It also sets out other proposed design features that have been incorporated to reduce the risk of flooding.

E-4. Finally, the report sets out how the Exception Test has been applied and demonstrates that:

- The Scheme would provide wider sustainability benefits to the community that would outweigh flood risk; and
- The Scheme 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.

1 Introduction

1.1.1 This Sequential and Exception Test Report has been prepared on behalf of Lime Down Solar Park Limited ("the Applicant") for the Lime Down Solar Park ('the Scheme'). The report accompanies an application for a Development Consent Order (DCO) to be submitted under Section 37 of the Planning Act 2008 ('the Act') to the Secretary of State for Energy Security and Net Zero ('the Secretary of State').

1.1.2 The Scheme comprises a solar photovoltaic (PV) electricity generating station with a total capacity exceeding 100 megawatts (MW) and associated development comprising Battery Energy Storage System (BESS) with an export capacity of up to 500 MW, grid connection infrastructure and other infrastructure integral to the construction, operation and maintenance, and decommissioning of the Scheme.

1.1.3 The PV electricity generating station and BESS would be contained within five land parcels referred to as Lime Down A, B, C, D and E (collectively referred to as the Solar PV Sites).

1.1.4 The Cable Route Corridor is the area within which the export connection cables would be located to connect the Solar PV Sites to the National Grid at the existing Melksham Substation (referred to as the Existing National Grid Melksham Substation) and the area within which cables connecting the Solar PV Sites would be located.

1.1.5 A full description of the Scheme is provided in **ES Volume 1, Chapter 3: The Scheme [APP-055]**.

1.1.6 The vast majority of land within the Order Limits is located within Flood Zone 1, with small sections of the Solar PV Sites located within Flood Zones 2 and 3. These include small areas of Lime Down B, C, D and E. The Cable Route Corridor is largely within Flood Zone 1, but it is crossed by several statutory main rivers and ordinary watercourses and there are areas of Flood Zones 2 and 3 associated with these watercourses (although these flood plains are relatively narrow in extent). Please refer to **ES Volume 1, Chapter 11: Hydrology, Flood Risk and Drainage [REP4-012]** and **ES Volume 2, Figures 11-1 to 11-8 [REP5-030 to REP5-034 and APP-142]** for details of the extent of Flood Zones 2 and 3 coverage across each of the Solar PV Sites and the Cable Route Corridor and **Figure 12: Solar PV Sites Layout and Flood Risk** accompanying this report.

1.1.7 The Overarching National Policy Statement for Energy – EN1 (NPS EN-1) (Ref 2) requires that flood risk 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" (Para. 5.8.6) (emphasis added).

1.1.8 Given the flood risk context of the Scheme, policies set out in NPS EN-1 and other relevant policy documents require the Sequential Test and, where appropriate, Exception Test to be demonstrated. The purpose of this report is to explain how the Sequential and Exception Tests have been applied by the Applicant in its assessment of alternative sites for the Scheme and in its design of the Solar PV Sites.

1.1.9 This report is supported by the following figures:

- Figure 1: Potential Development Areas within Flood Zone 1
- Figure 2: Potential Development Area 1: Flood Risk
- Figure 3: Potential Development Area 2: Flood Risk
- Figure 4: Potential Development Area 3: Flood Risk
- Figure 5: Potential Development Area 4: Flood Risk
- Figure 6: Potential Development Areas partially within Flood Zones 2 and 3
- Figure 7: Potential Development Area 5: Flood Risk
- Figure 8: Potential Development Area 6: Flood Risk
- Figure 9: Potential Development Area 7: Flood Risk
- Figure 10: Potential Development Area 8: Flood Risk
- Figure 11: Potential Development Area 9: Flood Risk
- Figure 12: Potential Development Area 10: Flood Risk
- Figure 13: Potential Development Area 11: Flood Risk
- Figure 14: Potential Development Area 12: Flood Risk
- Figure 15: Solar PV Sites Layout and Flood Risk

1.2 Cable Route Corridor

1.2.1 The focus of this report is the flood risk to the Solar PV Sites and alternative Solar PV Sites identified by the Applicant.

1.2.2 The cables for Cable Route Corridor will be installed underground and are inherently resilient to above ground flooding. The volume of the cables once installed would make a negligible difference to the flood depths over

a wide area and therefore will not increase the chances of flooding elsewhere.

1.2.3 The siting of the Cable Route Corridor is largely dictated by the requirement for the cable routing to be as direct as possible between the Solar PV Sites (for the Interconnecting Cables which link the Solar PV Sites) and between the Solar PV Sites the Existing National Grid Melksham Substation (for the Grid Connection Cables), in order to minimise losses in transmission. Alternative routes for the Cable Route Corridor were considered as set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]** and assessed against various indicators including length of route, number of road, rail, footpath and watercourse crossings and environmental constraints, with the least constrained option being preferred.

1.2.4 Whilst the route for the Grid Connection Cables between the Solar PV Sites and the Existing National Grid Melksham Substation does pass through areas at higher risk of flooding (in Flood Zones 2 and 3, and areas at risk from surface water flooding with a 0.1% - 3.3% annual chance of surface water flooding happening in any given year), this is limited to narrow areas around river crossings and avoids larger swathes of Flood Zones 2 and 3 around the River Avon to the east of the Cable Route Corridor. On this basis, there are no reasonable alternatives for the Cable Route Corridor in areas at lower risk of flooding.

1.2.5 The areas proposed for siting the Interconnecting Cables between the Solar PV Sites include limited areas of Flood Zones 2 and 3 and areas at risk of surface water flooding (0.1% - 3.3% annual chance). These are similarly located to provide a direct as possible route between the Solar PV Sites to minimise losses in transmission and to avoid other receptors such as adjacent pockets of woodland and properties. On this basis, there are no reasonable alternatives for siting the Interconnecting Cables in areas at lower risk of flooding.

1.2.6 On the above basis, the Cable Route Corridor is not considered further in this report.

1.3 Structure of this Report

1.3.1 The remainder of this report is structured as follows:

- Section 2: Policy Context and Guidance for the Sequential and Exception Tests: this sets out the legislative and planning policy requirements for the application of the Sequential and Exception Tests.
- Section 3: The Sequential Test for Site Selection: this sets out the Sequential Test applied in the selection of the Solar PV Sites for the

Scheme. It details how the Solar PV Sites perform against other alternative sites considered by the Applicant in terms of flood risk and other constraints.

- Section 4: The Sequential Test for the Solar PV Sites: this is a site-specific application of the Sequential Test, focussed on how the design and layout of the Solar PV Sites has considered flood risk.
- Section 5: The Exception Test: this sets out the Exception Test applied to both Site Selection for the Scheme and specifically for the Solar PV Sites.
- Section 6: Conclusion.

2 Policy and Guidance

2.1 Overview

2.1.1 NPS EN-1 (designated in January 2024) (Ref 2), section 5.8, details the aims of planning policy on development and flood risk in respect to NSIPs and signposts applicants to the National Planning Policy Framework (NPPF) (Ref 3) and the Planning Practice Guidance (PPG) (Ref 4) where appropriate.

2.1.2 The Department for Energy Security and Net Zero launched a consultation on revised National Policy Statements on 24 April 2025 (Ref 5), with draft updates made to NPS EN-1, NPS EN-3 and NPS EN-5. The draft revisions to NPS EN-1 have been considered and do not materially alter section 5.8 of NPS EN-1 regarding flood risk.

2.2 Overarching National Policy Statement for Energy – EN1

2.2.1 The overall aim of planning policy, in respect of development and flood risk, is:

"*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*" (paragraph 5.8.6 of NPS EN-1 (Ref 2).

2.2.2 In determining the application, the Secretary of State should be satisfied that the Sequential Test was applied and satisfied as part of site selection and that a sequential approach was applied at the site level to minimise risk by directing the most vulnerable uses to the areas of lowest flood risk (paragraph 5.8.36).

2.2.3 It is not specified in NPS EN-1 (Ref 2) what is meant by "*all sources of flooding*" but it is understood to include tidal flooding, fluvial (rivers and streams) flooding, pluvial (surface water) flooding, groundwater flooding, sewer flooding and artificial (reservoir/canal) flooding.

2.2.4 Paragraph 5.8.21 of NPS EN-1 (Ref 2) states:

2.2.5 "*The Sequential Test ensures that a sequential, risk-based approach is followed to steer new development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account. Where it is not possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites with medium risk areas and then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas.*"

2.2.6 Paragraph 5.8.29 of NPS EN-1 (Ref 2) goes on to explain that:

"*The sequential approach should be applied to the layout and design of the project. Vulnerable aspects of the development should be located on parts of the site at lower risk and residual risk of flooding. Applicants should seek opportunities to use open space for multiple purposes such as amenity, wildlife habitat and flood storage uses. Opportunities should be taken to lower flood risk by reducing the built footprint of previously developed sites and using SuDS.*"

2.2.7 NPS EN-1 (Ref 2) sets out the following in respect of the Exception Test (paragraph 5.8.9):

"If, following application of the Sequential Test, it is not possible, (taking into account wider sustainable development objectives), for the project to be located in areas of lower flood risk the Exception Test can be applied" [as defined in Guidance on Flood risk and coastal change (https://www.gov.uk/guidance/flood-risk-and-coastal-change#table)]. "*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".*

2.2.8 Paragraph 5.8.10 makes it clear that:

"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) [now National Landscapes], SSSIs and World Heritage Sites (WHS) which would not usually be considered appropriate".

2.2.9 Paragraph 5.8.11 provides that to pass the Exception Test, both of the following must be demonstrated:

- The project would provide wider sustainability benefits to the community that would 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.

2.3 National Planning Policy Framework

2.3.1 The National Planning Policy Framework, August 2026 (NPPF) (Ref 2) is clear that the *"aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Where the test applies, development proposals should not be located in areas at risk of flooding where alternative sites, appropriate to the development, are reasonably available in areas with a lower risk of flooding"' (Policy F5).*

2.3.2 Policy F5(2) states that the sequential test should be used in areas known to be at risk now or in the future from any form of flooding, other than in the specific circumstances listed in Policy F5(2). This includes where a site specific flood assessment demonstrates clearly that:

"i. 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 from flooding from any source, now and in the future (having regard to potential changes in flood risk), or

ii. where the site would be at risk of surface water flooding only, the proposed layout, design and mitigation measures would ensure that occupiers and users would remain safe from the current and future surface water flood risk for the lifetime of the development without increasing flood risk elsewhere".

2.3.3 Policy F6 applies where if, having applied the sequential test, it is not possible for development to be located in areas with a lower risk of flooding, the exception test has to be applied. The need for the exception test will depend on the potential vulnerability of the site and the development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex F of the NPPF. Annex F defines solar farms as "essential infrastructure", which is explained further in section 2.4 below.

2.3.4 For a site to meet the Exception Test, it should be demonstrated that the development would meet all the following criteria set out in NPPF Policy F6 :

"i) provide wider sustainability benefits to the community that outweigh the flood risk;

ii) be safe for its anticipated lifetime in accordance with Policy F7; and

iii) not increase flood risk elsewhere and, where possible, reduce flood risk overall."

2.3.5 NPPF Policy F7(2) explains that:

"*Where development is proposed in a location known to be at risk from any form of flooding, now or in the future, it should be refused unless:*

a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons which justify a different arrangement;

b) the development will be safe throughout its lifetime taking account of the vulnerability of its users;

c) Any residual risk can be safely managed, and safe access and escape routes are included where appropriate, as part of an agreed emergency plan;

d) 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; and

e) it can be demonstrated that flood risk will not be increased elsewhere."

2.4 Planning Practice Guidance

2.4.1 NPS EN-1 (Ref 2) footnotes the Planning Practice Guidance (PPG) (Ref 4) flood risk section (paragraph 023 Reference ID: 7-023-20220825 to Paragraph: 030 Reference ID: 7-030-20220825 (revision date 25 08 2022)) which provides guidance explaining how the Sequential Test should be applied. The PPG (Ref 4) states that the Sequential Test is designed to ensure that areas at little or no risk of flooding from any source are developed in preference to other areas of high risk. It provides that:

"*even where a flood risk assessment shows the development can be made safe throughout its lifetime…. the sequential test still needs to be satisfied."* (Paragraph: 023 Reference ID: 7-023-20220825).

2.4.2 The PPG (Ref 4) reiterates that all forms of flood risk (surface water/pluvial, groundwater, sewer and artificial) need to be treated consistently with fluvial (river) and tidal flooding in mapping probability and assessing vulnerability, so the Sequential Test is applied across all areas of flood risk.

2.4.3 In reference to Annex F of the NPPF (referred to in section 2.3 above), solar farms are categorised as "essential infrastructure".

2.4.4 As per Table 2 of PPG (Paragraph: 079 Reference ID: 7-079-20220825 Revision date: 25 08 2022), essential infrastructure is appropriate in Flood Zones 1 and 2, as well as in Flood Zones 3a and 3b if the Exception Test is met.

2.4.5 In the Notes to Table 2, it is also specified that, in Flood Zone 3a:

"Essential infrastructure should be designed and constructed to remain operational and safe in times of flood". In Flood Zone 3b, *"essential infrastructure that has passed the Exception Test, and water-compatible uses, should be designed and constructed to:*

- *remain operational and safe for users in times of flood;*
- *result in no net loss of floodplain storage*;
- *not impede water flows and not increase flood risk elsewhere*."

2.4.6 The PPG also provides non-exhaustive examples of how the Exception Test might be met (Paragraph: 036 Reference ID: 7-036-20220825 and Paragraph: 037 Reference ID: 7-037-20220825 (Revision Date: 25 08 2022)). This includes the following examples of wider sustainability benefits to the community: reuse of suitable brownfield land as part of a local regeneration scheme; an overall reduction in flood risk to the wider community through flood risk management infrastructure; and/or the provision of sustainable drainage systems that significantly exceed NPPF policy requirements. Examples given in the PPG of how a development could reduce flood risk overall include: the incorporation of green infrastructure to make additional space for the flow and storage of flood water; providing sustainable drainage systems that manage flood risk beyond the proposed site and above the usual standard; and/or providing or making contributions to flood risk management infrastructure that will provide additional benefits to existing communities.

2.5 Local Planning Policy

2.5.1 The vast majority of the Scheme is located within Wiltshire Council's administrative boundary. There are two small parcels of land off the A46 Bath Road which are included in the Order Limits for highway improvement works and fall within South Gloucestershire Council's administrative boundary. These areas are located on land within Flood Zone 1 and outside of areas at risk of surface water flooding. On that basis, the local planning policy for South Gloucestershire has not been considered further.

2.5.2 The current Local Plan is the Wiltshire Core Strategy (WCS), adopted in 2015 (Ref 6). However, Wiltshire Council is preparing a new Wiltshire Local Plan (Ref 7), which was submitted to the Secretary of State for Housing, Communities and Local Government for independent examination in November 2024. Ref 8Adoption of the new Local Plan is expected in quarter 2 of 2026 (Ref 8).

2.5.3 The current Local Plan (Ref 6) policies relevant to flood risk are:

- Core Policy 67: Flood Risk: this provides that all development proposed in Flood Zones 2 and 3 as identified within the Strategic Flood Risk Assessment will need to refer to the Strategic Housing Land Availability Assessment when providing evidence to the local planning authority in order to apply the sequential test in line with the requirements of national policy and established best practice. All new development must include measures to reduce the rate of rainwater run-off and improve rainwater infiltration to the soil and ground (sustainable urban drainage) unless site or environmental conditions make these measures unsuitable;
- Core Policy 68: Water Resources: This provides that development must not prejudice, and should contribute towards, delivery of the relevant river basin or catchment management plan. Non-residential developments will be required to incorporate water efficiency measures. Development within Source Protection Zones, Safeguard Zones or Water Protection Zones must assess any risk to groundwater resources and groundwater quality and demonstrate that there would be protected throughout construction and operation of the development; and
- Core Policy 69: Protection of the River Avon SAC: The Scheme does not fall within the relevant area for this policy.

2.5.4 The Wiltshire Council Level 1 Strategic Flood Risk Assessment (November 2024) (Ref 9) (SFRA) identifies which locations are more and least vulnerable to flooding from all relevant sources, identifies areas where further assessment of flood risk is needed and provides detail to enable the sequential test to be applied to inform allocations of land for development. The SFRA has been used be the Applicant to inform the assessment of potential sites for the Solar PV Sites, as detailed further in this report.

3 The Sequential Test for Site Selection

3.1 Overview of methodology

3.1.1 This section sets out how the Sequential Test has been applied as part of the Applicant's site selection for the Scheme and its consideration of alternative sites. The Applicant relies on the methodology adopted for site selection as set out in the Site Selection Assessment Report (SSAR) (**ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185])**, but additional consideration has been given to flooding from other sources for the purpose of this report. This report also considers updated flood mapping that was not available at site selection.

3.1.2 The Applicant's methodology for identification of alternative reasonably available sites required sites to meet the following general criteria:

- The site location must be within a 20km radius of the point of connection at the Existing National Grid Melksham Substation;
- Site availability must be compatible with the timing of the construction phase of the Scheme in order to meet the Scheme's grid export date;
- The site must have a geographical extent largely similar to the Scheme;
- The site must have potential suitability for large scale solar development when considered against other constraints;
- The site location should favour development on Flood Zone 1, with less development on Flood Zones 2 and 3; and
- The site must be "reasonably available" for such development subject to land agreements.

3.1.3 Adopting the above criteria, the following methodology was used to identify and consider reasonably available land:

- Stage 1: Identification of potential development areas (PDAs) in Flood Zone 1 within a 20km radius of the point of connection at the Existing National Grid Melksham Substation. *To note, for Stage 1 for the purposes of the Sequential Test incorporates stages 1-4 of identifying potential sites in the SSAR.*
- Stage 2: Assessment of PDAs against flood risk and other constraints. Ultimately, none of the PDAs selected at stage 2 were considered appropriate alternatives for the Scheme and therefore the search area was revised to include previously excluded land, including Flood Zones 2 and 3.

- Stage 3: Revising the search area to include other land, including Flood Zones 2 and 3 and identification of further PDAs.
- Stage 4: Assessment of further PDAs against environmental, technical and policy considerations, including flood risk, to identify their suitability as alternatives to the Solar PV Sites.
- Stage 5: consideration of additional PDAs identified on land with a steeper gradient.

3.1.4 The Applicant has relied on publicly available data to identify and assess each of the alternative PDAs and has not carried out any site-specific surveys in relation to flood risk for the alternative PDAs.

3.2 Process

Stage 1 – Identification of potential development areas in Flood Zone 1

3.2.1 As set out in the Applicant's Site Selection Assessment Report (SSAR) (**see ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**), the Applicant identified an area of search with a radius of 20km from the point of connection at the Existing National Grid Melksham Substation, which it considered to be a viable cable connection distance for a solar project of this scale.

3.2.2 The search area was then refined through the removal of various sections of constrained land and through application of the requirements for the Scheme. This includes:

- The exclusion of land within Flood Zones 2 and 3;
- The exclusion of all land within agricultural land classification Grades 1, 2 and 3;
- The exclusion of all land within National Landscapes;
- The exclusion of all land within Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SAC), Special Protection Areas (SPAs), SPA protection buffers, Ramsar Sites and National Nature Reserves;
- The exclusion of all land within the Bath Green Belt; and
- Consideration of proximity to nearby human receptors including residential dwellings and populated areas/villages.

3.2.3 After exclusion of the above areas, four potential development areas were identified through the application of key operational criteria for large scale

solar development – site size and land assembly; and topography. The use of previously developed (brownfield) land and alternative locations proposed through consultation were also considered, although ultimately discounted as they did not offer viable alternatives given the size and nature of the Scheme. Further details regarding brownfield sites and other sites suggested in consultation responses can be found in **ES Appendix 4-1: Site Selection Assessment Report [APP-185]**.

3.2.4 The four PDAs identified were:

- PDA1: Lyneham
- PDA2: East of Melksham
- PDA3: Marston
- PDA4: Trowbridge/Westbury

3.2.5 **Figure 1, Appendix A** shows the 20 km search area and Flood Zones 2 and 3 and the four PDAs that were identified.

Stage 2 – Assessment of initial potential development areas against other sources of flooding and other constraints

3.2.6 As set out in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**, the four identified PDAs were assessed against a number of environmental, technical and policy considerations to assess their suitability for the Scheme, including flood risk. A RAG rating (red, amber and green) was assigned for each consideration and the full RAG rating appears at Annex D of **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**.

3.2.7 When the PDAs were first assessed for suitability for the Scheme (as set out in the SSAR submitted at Preliminary Environmental Information Report (PEIR) stage), all four PDAs were found to be located in Flood Zone 1, therefore presenting a lower risk for fluvial flooding, and demonstrating that consideration has been given to steering development towards areas of lowest flood risk, as per the requirements of the Sequential Test. All four PDAs were bordered by areas of Flood Zones 2 and 3 immediately adjacent to their boundaries. All four PDAs also included sections of land at high risk from surface water flooding (3.3% annual chance). Consequently, as set out in the SSAR submitted at PEIR stage, their overall scoring for flood risk was assessed to be “amber” for each PDA and therefore neutral between the PDAs.

3.2.8 For the purposes of this report, PDAs 1-4 have been further assessed for flooding from all sources (tidal, fluvial, surface water, ground water and artificial sources). This further assessment takes into account the revised Environment Agency’s Flood Map for Planning (Ref 10) (updated on 25 March 2025) which displays updated flood zones using the new National Flood Risk Assessment 2 (NaFRA2) data. **Figures 2 to 5, Appendix A** of this report show each PDA against flood data for different forms of flooding and **Table 1, Appendix B** of this report sets out the RAG assessment for each PDA. The following assessment indicator was used for each source of flooding:

3.2.9 Assessment Indicator: is the PDA likely to be constrained by the risk of flooding from the relevant source?

	The majority of the PDA is within an area with moderate or significant risk of flooding from this source (tidal, fluvial, surface water, groundwater, artificial)
	The majority of the PDA is within an area with no or low risk of flooding from this source, but part of the area is within an area with moderate or significant risk of flooding.

	The PDA is entirely within an area with no or a low risk of flooding from this source.

3.2.10 As can be seen from **Table 1, Appendix B** of this report, the further analysis of flood risk from fluvial sources, based on the March 2025 version of the Environment Agency's Flood Map for Planning, shows that all four PDAs now contain small areas at higher risk of fluvial flooding (Flood Zone 3) than indicated on previous versions of the flood map. However, the areas of Flood Zone 3 are negligible in the context of the size of the overall PDAs. The overall rating for flooding from fluvial sources remains "amber" and therefore the conclusion regarding risks from fluvial flooding remains the same as previously assessed. Further, the additional assessment of the risks from other sources of flooding set out in **Table 1, Appendix B** of this report, is neutral between the four PDAs and does not change the overall rating on flood risk given to each PDA in the SSAR at PEIR stage or as updated for DCO submission (see **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**)

3.2.11 PDAs 1 to 4 have ultimately been discounted due to non-flood related matters. The constraints vary between the PDAs (please refer to the **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** for the specific constraints for each PDA) but include site size (i.e. too small to accommodate an appropriately sized solar scheme), current land use including land allocations and existing development, cultural heritage (presence of Grade II listed buildings within the boundary and nearby scheduled monuments, Listed buildings and conservation areas) and grid connection constraints.

3.2.12 This criteria-based approach aligns with paragraph 5.8.23 of NPS EN-1 which states that, in relation to flood risk, the *"consideration of alternative sites should take account of the policy on alternatives [contained within NPS EN-1]. All projects should apply the Sequential Test to locating development within the site".* NPS EN-1 paragraph 4.3.15, in relation to alternatives, provides that an applicant's explanation of alternative sites should set out *"reasons for the applicant's choice, taking into account the environmental, social and economic benefits including, where relevant, technical and commercial feasibility".* On that basis, planning policy supports a criteria-based approach, where flood risk is one of, but not the only, factor in overall site selection.

3.2.13 In summary, none of the initial 4 PDAs selected are considered appropriate alternatives for the Scheme due to other, non-flood related matters, and therefore, applying the Sequential Test at Stage 2 as set out at paragraph 5.8.7 of NPS EN-1 (Ref 1), there are no reasonably available sites in areas at lower risk of flooding. The search area was therefore

revised to include previously excluded land, including Flood Zones 2 and 3.

Stage 3 – Revision of the Search Area to include additional land including Flood Zones 2 and 3 and identification of further potential development areas

3.2.14 The search area was revised to include previously excluded land including areas within Flood Zones 2 and 3 and Grade 3 agricultural land. Using inputs of local land agents, six further PDAs were identified for consideration:

- PDA5: Whitley
- PDA6: Wraxall
- PDA 7: Lacock
- PDA8: Inmarsh
- PDA9: Rowdefield
- PDA10: Lime Down (The Scheme)

3.2.15 **Figure 6, Appendix A** shows the six further PDAs identified against Flood Zones 1, 2 and 3.

Stage 4: Assessment of further potential development areas against other sources of flooding and other constraints

3.2.16 The further PDAs were assessed against environmental, technical and policy considerations (including flood risk) to identify their suitability as alternatives to the Solar PV Sites. The RAG rating for each PDA is set out in Appendix D to the SSAR **(ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185])**.

3.2.17 In the SSAR submitted at PEIR Stage, PDAs 5, 9 and 10 were assessed in the SSAR as “amber” for flood risk. Each has small sections of Flood Zone 3 and small sections of areas at high risk of surface water flooding (3.3% annual chance).

3.2.18 PDAs 6, 7 and 8 were assessed in the SSAR as “red” for flood risk on the basis that they contained large areas of Flood Zones 2 and 3 (just Flood Zone 3 in the case of PDA6) and there are large sections at high risk of surface water flooding (3.3% annual chance).

For the purposes of this report, PDAs 5-10 have been further assessed for flooding from all sources (tidal, fluvial, surface water, ground water and artificial sources) including a re-assessment for fluvial flooding to account for the revised Environment Agency’s Flood Map for Planning (Ref 10) (updated on 25 March 2025). **Figures 7 to 12, Appendix A** of this report

show each PDA against flood data for different forms of flooding and **Table 2, Appendix B** below sets out the RAG assessment for each PDA, using the same assessment indicators as for PDAs 1-4..

3.2.19 As can be seen from **Table 2, Appendix B**, the further analysis of flood risk from fluvial sources of flooding does not change the overall rating on flood risk given to each PDA in the SSAR at PEIR stage or as updated for DCO submission (see **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**). The additional analysis of other sources of flooding is neutral between the PDAs and therefore does not change the overall rating given to each PDA for flood risk.

3.2.20 PDAs 5 and 9 were ultimately discounted due to non-flood related matters. PDAs 6, 7 and 8 were discounted due to a combination of flood risk and other factors. The constraints varied between the PDAs (refer to **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** for the specific constraints for each PDA) but include land use (land allocations and built development, together with land availability), cultural heritage, flood risk, and landscape**.** With regard to flooding, none of the PDAs identified performed any better than PDA 10 (the Scheme). PDA10 also performed better overall, in consideration of all constraints and criteria.

Stage 5: Additional PDAs considered at steeper topographic gradient

3.2.21 Since PEIR stage, **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]** has been updated to include an assessment of two further PDAs (PDAs 11 and 12), which have been identified on previously discounted land with a topographic of 5% or less. In accordance with the methodology adopted for PDAs 5-10, Flood Zones 2 and 3 were included within the search for land. Once identified, PDAs 11 and 12 have been RAG rated using the same criteria applied to all other PDAs (including flood risk) and the SSAR concludes that they do not outperform the proposed Site for the Scheme.

3.2.22 For the purposes of this report, PDAs 11 and 12 have been further assessed for flooding from all sources (tidal, fluvial, surface water, ground water and artificial sources). **Figures 13 to 14, Appendix A** of this report show each PDA against flood data for different forms of flooding and **Table 3, Appendix B** below sets out the RAG assessment for each PDA, using the same assessment indicators as for PDAs 1-10.

3.2.23 As can be seen from **Table 3, Appendix B**, the further analysis of flood risk from fluvial sources of flooding does not change the overall rating on flood risk given to each PDA in **ES Volume 3, Appendix 4-1: Site**

Selection Assessment Report [APP-185]). The additional analysis of other sources of flooding is neutral between the PDAs and therefore does not change the overall rating given to each PDA for flood risk.

3.2.24 PDA 11 was ultimately discounted due to flood risk and land use (with large swathes within the Bristol Avon Mineral Resource Zone and Mineral Safeguarding Area, and the presence of common land and an operational solar farm within the boundary which further reduce the already limited amount of land within the PDA. PDA 12 was discounted for non-flood risk related reasons, namely cultural heritage (with several Listed buildings within and near to the PDA, and one Scheduled Monument within the PDA) and site size. Whilst PDA 12 is 731 ha, it is relatively isolated from other PDAs and there are no opportunities for flexibility/refinement during design evolution, which means the PDA is unlikely to be big enough to accommodate a project equivalent to the Scheme. Full details of this assessment are provided in Table 3: Potential Development Areas Assessed at Stage 6 of the **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**.

Summary

3.2.25 With regard to flooding, none of the PDAs identified performed any better than PDA 10 (the Scheme) except for PDA12. PDA12 has been discounted for non-flood related reasons because it is of an insufficient size to provide the design flexibility required to accommodate an equivalent sized scheme, and there are heritage constraints. PDA10 performed better than the other PDAs overall, in consideration of all constraints and criteria.

3.2.26 On the basis of the assessment undertaken, it has been demonstrated that the Sequential Test has been appropriately applied in the site selection process, in accordance with paragraph 5.8.36 of NPS EN-1 (Ref 2).

4 Sequential Test – Solar PV Sites

4.1.1 In line with NPS EN-1 (Ref 2) paragraphs 5.8.29 and 5.8.36, a sequential approach has been applied at site level to the layout and design of the Scheme to minimise flood risk to the Solar PV Sites by directing the most vulnerable aspects of development to areas of lowest flood risk. The design also incorporates opportunities to reduce flood risk from the Solar PV Sites through the use of sustainable drainage strategies.

4.1.2 **Figure 15, Appendix C** shows the proposed layout for the Solar PV Sites and indicated the areas specifically allocated for solar PV panels, BESS and substation locations, landscape mitigation and biodiversity and enhancement areas. The following design features have been incorporated in consideration of the Sequential Test and to minimise flood risk:

- The areas of the Solar PV Sites within Flood Zones 2 and 3 have been used for the proposed location of solar PV panels and for biodiversity and enhancement areas, being elements of the Scheme that are less vulnerable to flooding.
- The most vulnerable elements of infrastructure, being the BESS and substations, will be sited in areas of Flood Zone 1, at lower risk of flooding. This is secured in the **Works Plan [REP6-004]**.
- Except where archaeological protection is required, the foundations of the Solar PV Panels are likely to be metal posts driven into the ground at an approximate depth of 1.5m to 4m (dependant on ground conditions).
- For both fixed and tracker panels where the Solar PV Panels are located within the 1% AEP plus climate change flood extent, the lowest leading edge of the panels will be set no less than 600mm above the design flood level. Where tracker panels are located within the design flood extent, the final tracker panel design will ensure that the lowest leading edge achieves 600mm freeboard above the design level, whilst remaining within the maximum tracker panel height of 4.5m above ground level.
- Integrated Conversion Units / 33 kV Sub-distribution Switch Rooms, standalone inverters, transformers and switchgear will be elevated by mounting structures so that they are no less than 0.6 m above the 0.1% Annual Exceedance Probability (AEP) flood level or where this is not possible as high as practicable.

- A buffer of 8 metres has been applied around watercourses within which there will be no built development, in order to mitigate against the impacts of flood risk to the Scheme.

4.1.3 With regard to the potential for flooding from the Scheme to other areas, the Solar PV Panels would be mounted on Solar PV mounting structures and raised above ground level allowing flood water to infiltrate the ground in situ. Therefore, there will be no loss of floodplain volume as a result of the Scheme and no increase in flood risk elsewhere. The BESS and substations are also not considered to increase flood risk elsewhere, due to the proposed embedded mitigation measures and due their siting in areas of lower flood risk. Surface water generated by the Scheme will be managed to ensure there is no increase in surface water runoff rates and volumes are not increased, and in the case of the BESS Area in Lime Down D, there will be a substantial betterment in surface water runoff rates, as set out in **ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy – Lime Down D / BESS [REP5-055]** and referred to further below.

4.1.4 In summary, the Applicant has considered flooding in the design of the Solar PV Sites in order to minimise the risk of flooding both to and from the Scheme. In doing so, the Sequential Test has been appropriately applied.

5 Exception Test: Site Selection and Solar PV Sites

5.1 Introduction

5.1.1 As identified above, the Applicant's application of the Sequential Test has shown that there are no reasonably available, lower-risk sites that are suitable for the Scheme, to which development can be steered. Therefore, the Applicant has also applied the Exception Test in accordance with paragraphs 5.8.10 and 5.8.11 of NPS EN-1 (Ref 2).

5.1.2 Paragraph 5.8.11 of NPS EN-1 states "*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 would 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."*

5.1.3 This section applies equally to initial site selection and the design of the Solar PV Sites.

5.2 Wider Sustainability Benefits

5.2.1 National Planning Practice Guidance (NPPG) (Ref 4) provides that local planning authorities need to set their own criteria for an assessment of wider sustainability benefits to the community that may be seen to outweigh flood risk. Those criteria for Wiltshire Council are discussed below, with the NPPG giving the following examples, which are explained further below:

- The re-use of suitable brownfield land as part of a local regeneration scheme;
- An overall reduction in flood risk to the wider community through the provision of, or financial contribution to, flood risk management infrastructure; and
- The provision of multifunctional sustainable drainage systems that integrate with green infrastructure, significantly exceeding National Planning Policy Framework requirements for sustainable drainage systems.

Suitable Brownfield Land

5.2.2 The use of brownfield sites for the Scheme has been considered with further details provided in **ES Volume 3, Appendix 4-1: Site Selection Assessment Report [APP-185]**. The following brownfield land registers were considered:

- Wiltshire Council – Brownfield Register 2022 (Ref 11).
- South Gloucestershire Council – Brownfield Register 2023 (Ref 12).
- Bath and North East Somerset Council – Brownfield Register 2023 (Ref 13).
- Somerset Council - Brownfield Register 2024 (Ref 14).

5.2.3 However, none of the brownfield sites identified are considered suitable for the following reasons:

- None of the registered brownfield sites over 1ha are large enough alone to provide a viable land parcel of at least 40ha[1] and therefore no individual brownfield site from the registers provides an adequate area to facilitate an NSIP scale solar project equivalent to the Scheme;
- A combination of smaller sites is not considered viable as all sites considered are below the Applicant's minimum 40ha threshold for individual land parcels and, even if the sites were able to be combined, they would still not provide sufficient land to accommodate a project as large as the Scheme; and
- the majority of sites considered are already subject to applications for residential developments and/or are allocated for residential/mixed use development and therefore are not considered to be available for the Scheme.

An overall reduction in flood risk

5.2.4 As set out in **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessment and Drainage Strategies [REP4-021 to REP 4-036 and REP3-064]**, the risk to the Site from all sources of flooding is Negligible to Low.

5.2.5 Associated electrical infrastructure, including substations and Conversion Units (refer to **ES Volume 1, Chapter 3: The Scheme [APP-055]**) are sequentially located to areas with a 'Low' probability of flooding (less than

[1] 40 ha being the Applicant's minimum threshold for any individual site to be considered for the Scheme. This is due to the costs of connecting infrastructure between individual sites and electricity losses from the multiple connection cabling that would be necessary.

1 in 1,000 annual probability of river or sea flooding (<0.1%)), where practicable.

5.2.6 Less-flood sensitive infrastructure forming the wider Scheme (Solar PV Panels and cabling) will be sequentially located outside the 1 in 100 plus climate change annual probability extent (1% +CC) or where this is not practicable restricted to areas which experience less than 1m depth of flooding during the same event.

5.2.7 The **Outline Construction Environment Management Plan [REP6-029]** accompanying the DCO application, describes water management measures to control surface water run-off and drain hardstanding and other structures during the construction of the Scheme. This includes appropriate temporary site drainage during construction, pollution control mechanisms, measures for storage of topsoil/subsoil and materials to protect watercourses and existing surface water drainage and silt management measures. It also includes measures for the preparation of the flood risk management plan/method statement which will provide details of the response to an impending flood.

5.2.8 The Applicant confirms that no formal provision of, or financial contribution towards, flood risk management infrastructure has currently been agreed with Wiltshire Council or any Parish Council as part of the DCO application. However, the Applicant is actively seeking to assist with the understanding of existing flooding issues in and around Corston. In response to local community concerns and the interest raised around potential flood alleviation opportunities associated with Gauze Brook including those raised at the Open Floor Hearing on 24 April 2026, the Applicant is voluntarily commissioning additional topographic survey and updated hydraulic modelling for Lime Down D.

5.2.9 The purpose of the additional survey and modelling work is to establish whether workable flood alleviation, catchment management or natural flood management measures in and around Gauze Brook could produce a meaningful benefit for Corston and downstream communities. Potential conceptual measures will be tested through the updated hydraulic model, so that any future discussion is informed by a robust technical evidence base.

5.2.10 The modelling outputs will be provided to Wiltshire Council, the Environment Agency and the local community via the relevant Parish Councils. The intention is that the survey information, updated model and conceptual outputs can then be used by the relevant authorities and local stakeholders to inform any future flood alleviation opportunities they may wish to take forward.

5.2.11 This work does not form part of the submitted Flood Risk Assessment and Drainage Strategy, which demonstrates that the Scheme would not increase flood risk elsewhere. Furthermore, it is not relied upon as mitigation required to make the Scheme acceptable in flood risk terms, but is being progressed voluntarily by the Applicant to provide a positive community benefit exercise to seek to help alleviate existing flood risk issues and to provide a useful evidence base for the local area.

The provision of multifunctional sustainable drainage systems

5.2.12 As set out in **ES Volume 3, Appendices 11-1 to 11-9 Flood Risk Assessments and Drainage Strategies [REP4-021 to REP 4-036 and REP3-064]**, SuDS have been incorporated throughout the Scheme where appropriate. Where practicable, runoff from equipment and access tracks will be directed to permeable SuDS features such as gravel-filled trenches or French drains, or similar passive drainage features appropriate to local conditions.

Summary

5.2.13 Alongside the NPPG examples, the Wiltshire Council Level 1 Strategic Flood Risk Assessment (November 2024) states that to demonstrate development would provide wider sustainability benefits to the community that outweigh the flood risk, *"Applicants should refer to wider sustainability objectives in Local Plan Sustainability Appraisals. These often consider matters such as biodiversity, GI, historic environment, climate change adaptation, flood risk, green energy, pollution, health, transport etc".*

5.2.14 Whilst the Scheme itself is related to low carbon renewable energy generation, the substantial wider sustainability benefits of the Scheme are set out in the **Statement of Need [REP1-085]** and summarised in the **Planning Statement [REP3-081]**. This includes:

- *Climate change adaptation*: Wider sustainability benefits and a contribution to meeting the Government's legal obligations on climate change, delivery of Clean Power by 2030, net zero by 2050 and energy security. The Scheme addresses three key requirements of the UK energy market; decarbonisation, the demand for electricity and security of supply. The Scheme will help to address the increase in demand for electricity, and will make a critical and timely contribution to decarbonisation and security of supply in the UK by increasing the country's capacity to generate affordable electricity from renewable sources at home, rather than relying on imports from overseas;

- *Job creation*: the Scheme is anticipated to create 268 Full Time Equivalent (FTE) per annum with the estimated on-site construction workforce expected to peak at approximately 692 total employees (gross direct employment) during the construction phase. During operation, 15 permanent jobs would be generated. In a peak replacement scenario, 125 FTE are required and in the decommissioning phase up to a gross of 214 FTE employees per annum are estimated., as set out in **ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068]**;
- *Tangible economic benefits*: **ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [APP-068]** sets out the anticipated economic growth in the construction, operation and decommissioning phases of the Scheme. The net direct employment generated by the Scheme during construction is anticipated to induce an uplift of £15.7 million Gross Value Added[2] (GVA) per annum to the area within 20km of the Scheme. The Scheme is anticipated to induce a further uplift of £10.2 million GVA per annum more generally in the economy of the Study Area through indirect and induced economic benefits associated with the Scheme's construction. During operation, the net direct employment generated by the Scheme is anticipated to create an uplift of £2.12 million GVA per annum, of which approximately £564,000 GVA per annum is anticipated to be generated within 20km of the Scheme. During the peak replacement scenario, the net direct employment from the Scheme is anticipated to generate an uplift of £7.34 million GVA in the Study Area, with an additional £2.13 million GVA elsewhere in the UK. During decommissioning, the net direct employment generated is anticipated to induce an estimated uplift of £12.6 million GVA per annum within 20km of the Scheme. Therefore in total, accounting for the number of years at each phase, the Scheme is anticipated to generate an uplift of in excess of £161 million GVA (chained to 2023 value) within 20km of the Scheme alone (with further benefits nationally).
- *Skills training:* The **Outline Skills, Supply Chain and Employment Plan [REP3-104]** sets out the proposals to promote apprenticeship and training schemes to enhance local skills and qualification rates and help retrain people in work displaced by the Scheme, and decrease the proportion of workers required to be brought in from further afield. This is intended to enhance local education, skills and attainment during construction and for periods of onsite infrastructure replacement during operation of the Scheme. The **Outline Skills, Supply Chain and**

[2] Gross Value Added measures the value of goods and services in a given area. For further details, see ES Volume 1, Chapter 16: Socio Economics, Tourism and Recreation [EN010168/APP/6.1]

Employment Plan [REP3-104] also provides measures to secure opportunities for re-skilling of employees into new industries, including the energy sector, and include supporting the local agricultural industry in diversified agricultural practices;

- *Landscape enhancements and habitat creation*: as set out in **ES Volume 2, Figure 3-1: Indicative Site Layout Plan [APP-081], ES Volume 2, Figure 3-4: Landscape and Ecology Mitigation Plan [REP6-009]** and **ES Volume 1, Chapters 8: Landscape and Visual [REP6B-004] and 9: Ecology and Biodiversity [REP4-010]**, the Scheme proposes to deliver substantial new hedgerow and tree planting, reinforcement planting at existing hedgerows and field boundaries, extensive grassland habitat creation and sympathetic management both within buffers and under the Solar PV arrays, as well as discrete, valuable habitat creation away from the Solar PV Panels. This includes connective woodland planting, mixed grassland/wildflower planting; enhanced riparian native planting; reinforced road-side screening; hedgerow reinforcement and pond creation. Further, the reversion of the arable fields which dominate the Solar PV Sites to grassland (for the lifetime of the Scheme) is considered likely to result in a significant beneficial effect by improving the extent and quality of grassland habitats within the Solar PV Sites which may provide supporting habitat for species. Beneficial effects to the soil may also be derived from the cessation of cultivation, chemical treatments and soil inputs.

- *Biodiversity*: the Scheme will deliver, as a minimum, 10% Biodiversity Net Gain (BNG), which is secured via Requirement 9 in Schedule 2 to the **Draft DCO [REP6-005].** The **BNG Assessment Report [REP6-024 and as updated for Deadline 7]** indicates that BNG in excess of 10% will be achieved, with a total net gain of 65.35% for area habitat units, 19.39% for hedgerow units and 25.30% for watercourse units in relation to the Solar PV Sites. The total net gain for the whole Scheme (i.e. Solar PV Sites and Cable Route Corridor combined) is 37.64% for area habitat units, 12.77% for hedgerow units and 19.89% for watercourse units.

- *Accessibility*: The creation of 12.8 km of new permissive paths: the Scheme includes the creation of 12.8 km of new non-vehicular permissive paths on each of the Solar PV Sites for the lifetime of the Scheme to provide pedestrians and horse and bicycle riders improved accessibility to the countryside and improved connectivity of the wider PRoW network. The permissive paths will provide a beneficial impact on PROW use for local users and visitors through mitigating adverse impacts on other PROWs and providing alternative access routes to

the use of the local highway network. These measures, when implemented, will enhance connectivity in the local area for recreation purposes, secondarily benefitting the health and wellbeing of the local population in the long-term. The design and implementation of the permissive paths is set out in the **Outline Public Rights of Way and Permissive Paths Management Plan [REP1-104]** and **Outline Landscape and Ecological Management Plan [REP6-037]** and secured by a Requirement in the **Draft DCO [REP6-005]**;

- *Flood risk*: As outlined in **ES Volume 3, Appendices 11-1 to 11-9: Flood Risk Assessments and Drainage Strategies [REP4-021 to REP 4-036 and REP3-064]** (discussed in further detail below) the risk of flooding to the site is generally negligible to low, and, in the case of the BESS Area in Lime Down D, there will be a 30% betterment through the overall reduction of surface water flooding compared to the current use of the land.

5.2.15 Therefore, the wider sustainability benefits delivered by the Scheme overwhelmingly outweigh the flood risk, which is negligible in the case of the Scheme, and the Scheme is in accordance with the first part of the Exception Test. These benefits also help support wider sustainability matters of Wiltshire Council.

5.2.16 While not directly relevant to the weighing of sustainability benefits against flood risk, the Applicant has also committed to a Community Benefit Fund (CBF). The CBF does not form part of the DCO application and this funding is not required to mitigate the impacts of the Scheme. Therefore, it cannot be taken into account in the decision making process for determining the DCO application. However, it will be available to fund local projects.

5.3 The Scheme will be safe for its lifetime

5.3.1 **ES Appendices 11-1 to 11-9: Flood Risk Assessments and Drainage Strategies [REP4-021 to REP 4-036 and REP3-064]** include specific flood risk assessments for each of the Solar PV Sites and the Cable Route Corridor and set out mitigation measures which are required to ensure that the Scheme remains safe for its lifetime, avoid increasing flood risk elsewhere, and may reduce flood risk overall.

5.3.2 The FRA confirms that for all elements of the Scheme (Cable Route Corridor and the Solar PV Sites), the risk from all sources of flooding without mitigation is negligible to low. Further, embedded mitigation is proposed to be incorporated to ensure the Scheme remains safe for its lifetime, including:

- 8 metre buffers from infrastructure will be established around watercourses, including Main Rivers and Ordinary Watercourses for all phases of the Scheme;
- All cabling would be designed and installed to be flood resilient/water compatible. This would be achieved in accordance with appropriate design standards and best practice guidance;
- Construction/decommissioning groundworks would be kept as far from the watercourses/drainage ditches as reasonably practicable;
- Where practicable, existing access tracks would be retained to limit the requirement to develop new access which can disturb soils and lead to compaction. Where new access tracks are required, they would be designed to avoid crossing drainage ditches;
- The **Outline Construction Environmental Management Plan [REP6-029]** accompanies the DCO application and describes water management commitments to control surface water runoff and drainage in areas of hardstanding and other structures during the construction, operation and maintenance, and decommissioning phases. It also includes details of pre-construction, construction, and post-construction water quality monitoring based on a combination of visual observations and reviews of the Environment Agency's automatic water quality monitoring network; and
- For the BESS and substation areas, in addition to being sited in areas of Flood Zone 1, further mitigation measures are proposed including raising equipment above surrounding ground levels, waterproofing to ensure the equipment can withstand the effects of flooding to the site from other sources, and design measures to ensure contaminants are not discharged into watercourses in the unlikely event of a leak or fire.

5.3.3 **ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy – Lime Down D [REP5-055]** includes a site-specific drainage strategy for the proposed BESS Area to ensure that surface water drainage from the Scheme does not increase the risk of surface water flooding elsewhere.

5.3.4 The Scheme may also reduce flood risk from surface water overall, as follows:

- The existing intensively managed agricultural land will be replaced by planted grassland below the Solar PV Panels which will reduce the chances of erosion, increased speeds of surface water run-off and subsequent surface water flooding. The Solar PV Panels will not be tightly packed as to form a continuous impermeable surface, and the

small gaps between individual panels will allow water to drip onto the ground from several locations rather than as a concentrated runoff from the bottom edge, thereby reducing the potential for erosion and surface water flooding.

- The drainage strategy for BESS Area and substation areas in Lime Down D **(see ES Volume 3, Appendix 11-6: Flood Risk Assessment and Drainage Strategy – Lime Down D [REP5-055])** addresses the increase in hardstanding resulting from the facilities. For areas with increased hardstanding, post development flows have been restricted to 70% of the equivalent greenfield rate for all return periods, including 1 in 1 and 1 in 2 year events. Attenuation storage has been sized to ensure compliance with this requirement. This will result in a significant betterment (30%) of surface water runoff rates and is in line with emerging local policy.

5.3.5 In summary, the above measures demonstrate the Scheme's compliance with the second part of the Exception Test, in that the Scheme will be safe for its lifetime, taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

6 Conclusion

6.1.1 In line with the relevant national and local planning policy, the Applicant has applied the Sequential and Exception tests to both site selection for the Solar PV Sites for the Scheme, and on a site-specific basis to the design of the Solar PV Sites to ensure that the most vulnerable uses are sited in areas of lower flood risk.

6.1.2 The Applicant has initially considered siting the Scheme on reasonably available land within Flood Zone 1, in line with the Sequential Test. However, in the absence of suitable land parcels within Flood Zone 1, it has considered areas within Flood Zones 2 and 3 and assessed each of them for potential risks of flooding. The Scheme is assessed as the best option overall, taking account of the risk of flooding (which, for the Scheme, is negligible to low) and other relevant constraints.

6.1.3 The Applicant has also considered the Sequential Test at a site level, with incorporation of design features to locate more vulnerable elements of the Scheme within areas of lower flood risk, and to generally safeguard the Solar PV Sites from flooding both to and from site.

6.1.4 Finally, the Applicant has applied the Exception Test and this report sets out the substantial wider sustainability benefits of the Scheme, together with the proposed measures that have been incorporated into the Scheme design to ensure that the Scheme is safe from flooding for its lifetime and will not increase the risk of flooding elsewhere.

6.1.5 Therefore, the Applicant has applied both the Sequential and Exception Tests and demonstrated how the Exception Test is met in line with relevant policy.

7 References

Ref 1 UK Government. *Planning Act 2008*. Available at: https://www.legislation.gov.uk/ukpga/2008/29/contents. Last accessed 01/05/2025

Ref 2 UK Government. *Overarching National Policy Statement for energy (EN-1) (January 2024)*. Available at: https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1. Last accessed 01/05/2025

Ref 3 UK Government. *National Planning Policy Framework*. (August 2026) Available at: https://www.gov.uk/government/publications/national-planning-policy-framework--2. Last accessed 01/10/2026

Ref 4 Ministry of Housing, Communities & Local Government (2016 and as amended). *Planning practice guidance*. Available at: https://www.gov.uk/government/collections/planning-practice-guidance. Last accessed 01/05/2025

Ref 5 Department for Energy Security and Net Zero. *Planning for new energy infrastructure: 2025 revisions to National Policy Statements*. Available at: https://www.gov.uk/government/consultations/planning-for-new-energy-infrastructure-2025-revisions-to-national-policy-statements Last accessed 01/05/2025

Ref 6 Wiltshire Council. *Wiltshire Core Strategy 2015.* Available at: https://www.wiltshire.gov.uk/planning-policy-core-strategy. Last accessed 01/05/2025

Ref 7 Wiltshire Council. *The Local Plan Review.* Available at https://www.wiltshire.gov.uk/article/8037/The-Local-Plan-review. Last accessed 01/05/2025

Ref 8 Wiltshire Council. *Local Plan Review, https://www.wiltshire.gov.uk/article/8037/The-Local-Plan-review* . Last accessed 21/07/2025

Ref 9 Wiltshire Council. *Wiltshire Council Level 1 Strategic Flood Risk Assessment (November 2024).* Available at https://www.wiltshire.gov.uk/media/14497/SD67-Wiltshire-Level-1-Strategic-Flood-Risk-Assessment-2024/pdf/SD67_Wiltshire_Level_1_Strategic_Flood_Risk_Assessment_2024.pdf?m=1733141632550. Last accessed 01/05/2025

Ref 10 Environment Agency. *Flood Map for Planning (March 2025)*. Available at https://flood-map-for-planning.service.gov.uk/. Last accessed 01/05/2025

Ref 11 Wiltshire Council. *Brownfield Register 2022.* Available at https://www.wiltshire.gov.uk/planning-brownfield-register. Last accessed 01/05/2025

Ref 12 South Gloucestershire Council. *Brownfield Register 2023.* Available at https://beta.southglos.gov.uk/planning-authority-monitoring-reports/ Last accessed 01/05/2025

Ref 13 Bath and North East Somerset Council. *Brownfield Register 2023.* Available at https://www.bathnes.gov.uk/policy-and-documents-library/brownfield-register. Last accessed 01/05/2025

Ref 14 Somerset Council. *Brownfield Register 2024.* Available at https://www.somerset.gov.uk/planning-buildings-and-land/brownfield-register/. Last accessed 01/05/2025

Ref 15 Cranfield University. *Soilscapes Mapping 2016*. Available at https://www.data.gov.uk/dataset/26d61739-e05b-420d-8fd0-d11edffa8b27/soilscapes1 . Last accessed 12/05/2025

Appendix A: Site Selection Figures

Lime Down Solar Park

Title:
Figure 1: Potential Development Areas within Flood Zone 1

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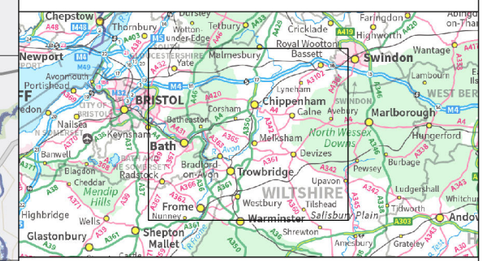
Legend:

- Existing National Grid Melksham Substation (PoC)
- Area of Search
- Flood Zone 2
- Flood Zone 3

Potential Development Area (PDA)

- PDA 1
- PDA 2
- PDA 3
- PDA 4

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Application Doc No.: EN010168/APP/7.2

Drawing no.: P4443_LPR_ZZ_XX_DR_Z_SEQ_0285

Coordinate system: British National Grid

Scale: 1:150,000 @ A3

0 2 4 6 km

Island GREEN POWER

Lanpro

394000 396000 398000 400000 402000 404000 406000

184000 182000 180000 178000 176000

B4042 Little Somerford Stopper's Hill Callow Hill Brinkworth M4 Great Somerford Dauntsey Park Startley Dauntsey Royal Woo Basset Upper Seagry Main Road B4069 A3102 Bradenstoke Tockenham Christian Malford Sutton Benger Lyneham Bushton Foxham Goatacre Hilmarton East Tytherton

Lime Down Solar Park

Title:
Figure 2: Potential Development Area 1 Flood Risk

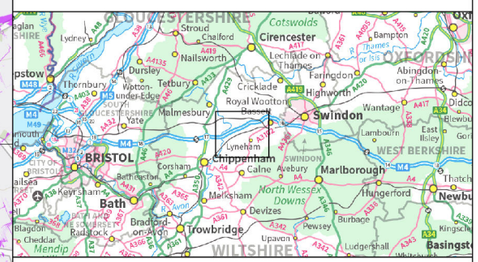
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Legend:

Potential Development Area (PDA)
- PDA 1
- Flood Zone 2
- Flood Zone 3

Risk of Flooding from Surface Water
Flood Likelihood Category
- High
- Medium
- Low
- Reservoir Flood Extents - Wet Day
- Reservoir Flood Extents - Dry Day
- Reservoir Flood Extents - Fluvial Contribution

Data: Environment Agency, IGP, 2025
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Drawing no.: P4443_LPR_ZZ_XX_DR_Z_SEQ_0286

Coordinate system: British National Grid

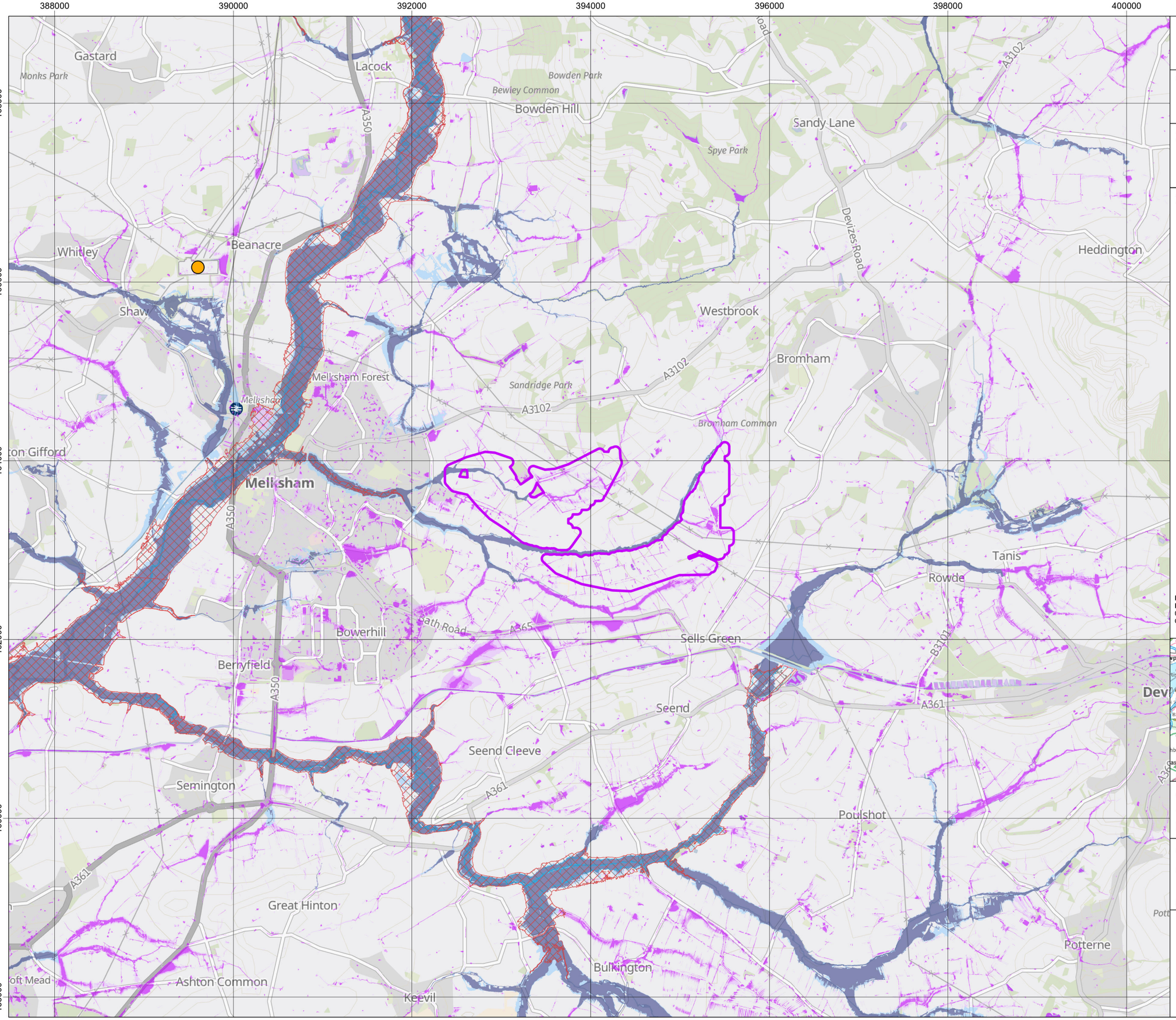
Scale: 1:40,000 @ A3

N W E S

0 1 2 km

Island GREEN POWER

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Lime Down Solar Park

Title:
Figure 3: Potential Development Area 2 Flood Risk

Document:
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Legend:

- Existing National Grid Melksham Substation (PoC)

Potential Development Area (PDA)

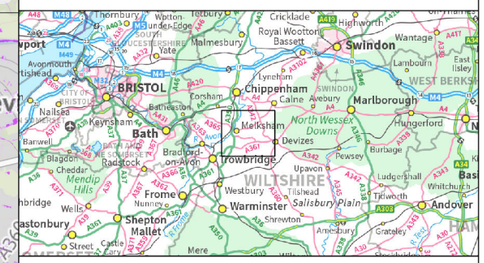
- PDA 2
- Flood Zone 2
- Flood Zone 3

Risk of Flooding from Surface Water

Flood Likelihood Category

- High
- Medium
- Low
- Reservoir Flood Extents - Wet Day
- Reservoir Flood Extents - Dry Day
- Reservoir Flood Extents - Fluvial Contribution

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Application Doc No.: EN010168/APP/7.2

Drawing no.: P4443_LPR_ZZ_XX_DR_Z_SEQ_0286

Coordinate system: British National Grid

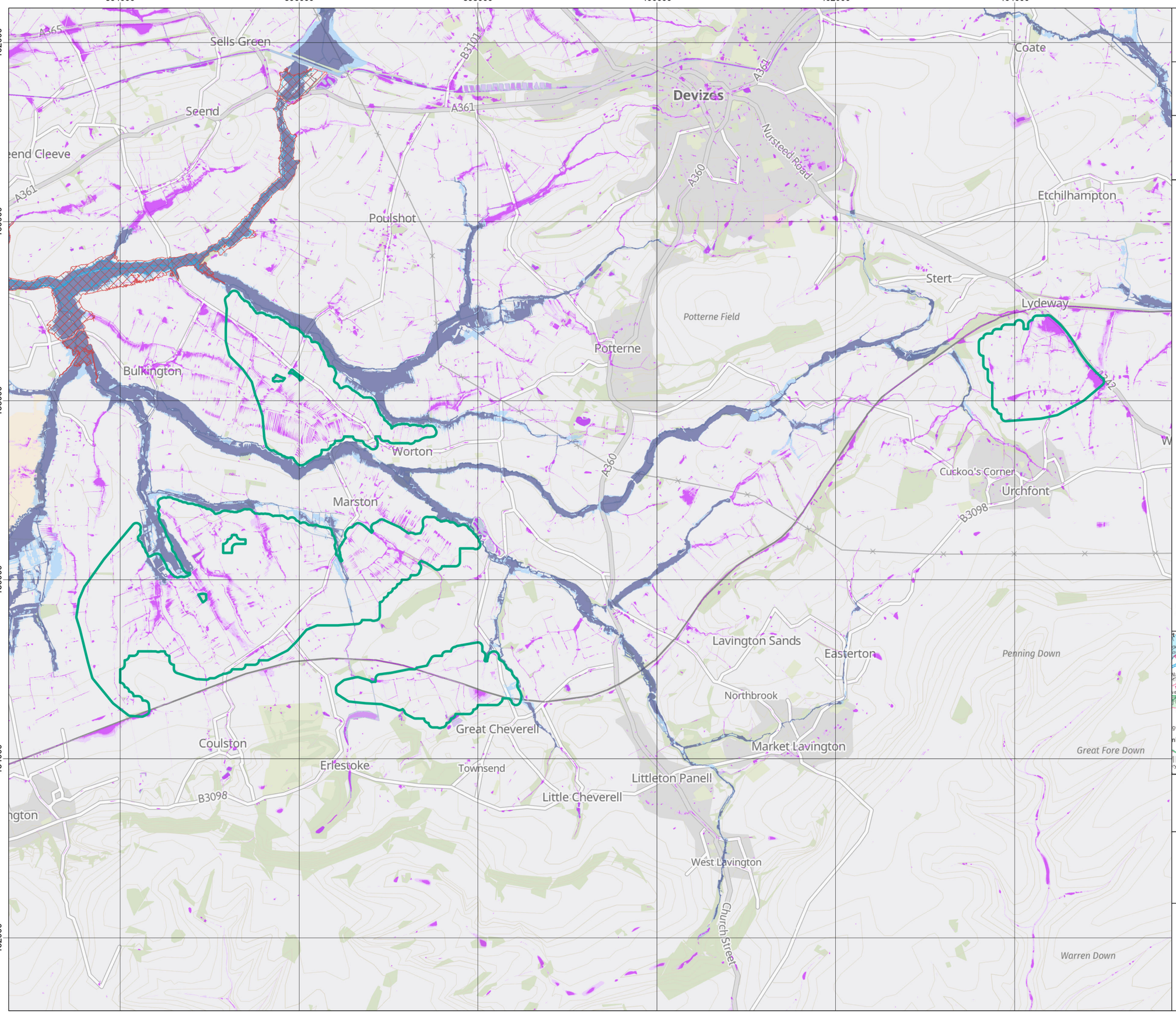
Scale: 1:40,000 @ A3

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0 1 2 km

Island GREEN POWER

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Lime Down Solar Park

Title:
Figure 4: Potential Development Area 3 Flood Risk

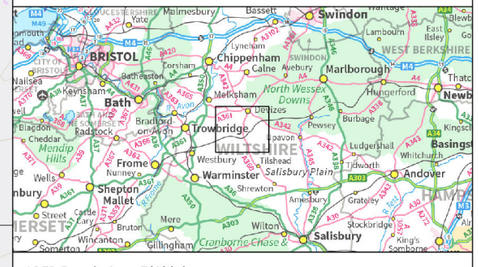
Document:
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Legend:

Potential Development Area (PDA)
- PDA 3
- Flood Zone 2
- Flood Zone 3

Risk of Flooding from Surface Water Flood Likelihood Category
- High
- Medium
- Low
- Reservoir Flood Extents - Wet Day
- Reservoir Flood Extents - Dry Day
- Reservoir Flood Extents - Fluvial Contribution

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Application Doc No.: EN010168/APP/7.2

Drawing no.: P4443_LPR_ZZ_XX_DR_Z_SEQ_0286

Coordinate system: British National Grid

Scale: 1:40,000 @ A3

0 1 2 km

Island GREEN POWER

Lanpro

382000 384000 386000 388000 390000 392000

158000 156000 154000 152000 150000

Hilperton Marsh
Hilperton
Trowle Common
Paxcroft Mead
Ashton Common
Great Hinton
Keevil
Keevil Airfield
Trowbridge
Long Street
Studley Green
Wingfield
Lower Studley
Upper Studley
Steeple Ashton
Rood Ashton Park
West Ashton
Southwick
North Bradley
Yarnbrook
Frome Road
Bradford Road
A361
A350
B3109
B3098
Hawkeridge
Heywood
Row
Edington
Bratton
The Ham
Westbury
Rudge
Winkland's Down
Bratton Down
Warden's Down
Four Hundred Down
Farm Down
Westbury Down
Dilton Down
Tenantry Down
Dilton Marsh
Westbury Leigh
Chalford
Stormore
Dilton Middle Down
Knapp Down
Upton Cow Down
Middle Ridge Down
Chalcot Park
Summer Down

Lime Down Solar Park

Title:
Figure 5: Potential Development Area 4 Flood Risk

Document:
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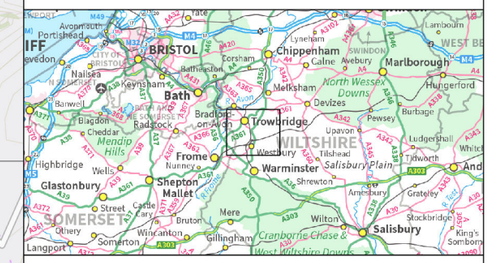
Legend:

Potential Development Area (PDA)
- PDA 4

- Flood Zone 2
- Flood Zone 3

Risk of Flooding from Surface Water Flood Likelihood Category
- High
- Medium
- Low
- Reservoir Flood Extents - Wet Day
- Reservoir Flood Extents - Dry Day
- Reservoir Flood Extents - Fluvial Contribution

Data: Environment Agency, IGP, 2025
Base map: © Crown copyright and database rights 2025 Ordnance Survey 0100031673. Contains OS data © Crown Copyright and database right 2025 Contains cata from OS Zoomstack



APFP Regulation: 5(2)(q)

Application Doc No.: EN010168/APP/7.2

Drawing no.: P4443_LPR_ZZ_XX_DR_Z_SEQ_0286

Coordinate system: British National Grid

Scale: 1:40,000 @ A3

N W E S

0 1 2 km

Island GREEN POWER

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Lime Down Solar Park

Title:
Figure 6: Potential Development Areas partially within Flood Zones 2 and 3

Document:
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- Sequential and Exception Test
Planning Statement

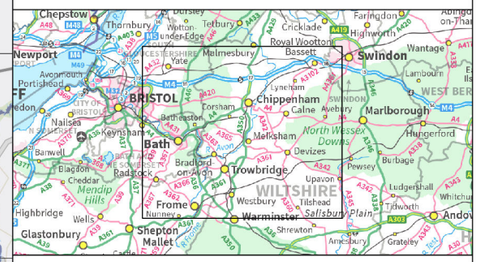
Legend:

- Existing National Grid Melksham Substation (PoC)
- Area of Search
- Flood Zone 2
- Flood Zone 3

Potential Development Area (PDA)

- PDA 5
- PDA 6
- PDA 7
- PDA 8
- PDA 9
- PDA 10

Data: Environment Agency, IGP, 2025
Base map: © Crown copyright and database rights 2025 Ordnance Survey 0100031673. Contains OS data © Crown Copyright and database right 2025 Contains data from OS Zoomstack



APFP Regulation: 5(2)(q)

Application Doc No.: EN010168/APP/7.2

Drawing no.: P4443_LPR_ZZ_XX_DR_Z_SEQ_0287

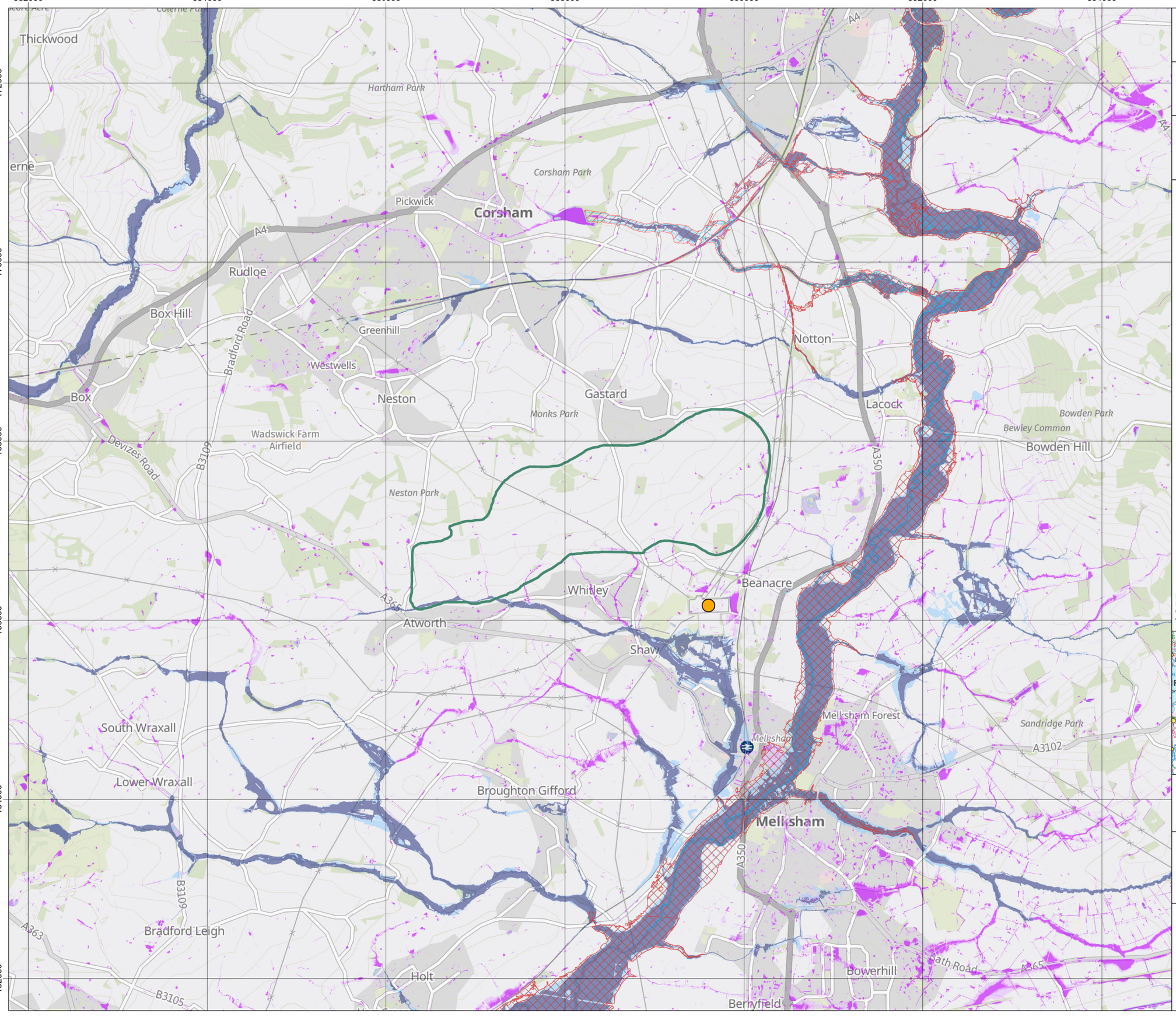
Coordinate system: British National Grid

Scale: 1:150,000 @ A3

0 2 4 6 km

Island GREEN POWER

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Lime Down Solar Park

Title:
Figure 7: Potential Development Area 5 Flood Risk

Document:
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Hydrology, Flood Risk and Drainage
- Sequential and Exception Test
Planning Statement

Legend:

- Existing National Grid Melksham Substation (PoC)

Potential Development Area (PDA)

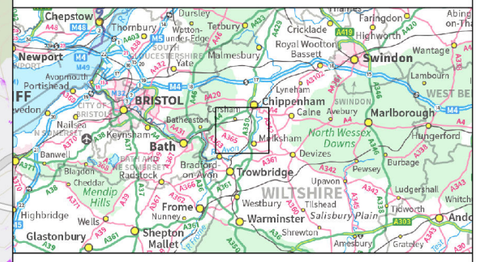
- PDA 5
- Flood Zone 2
- Flood Zone 3

Risk of Flooding from Surface Water

Flood Likelihood Category

- High
- Medium
- Low
- Reservoir Flood Extents - Fluvial Contribution
- Reservoir Flood Extents - Dry Day
- Reservoir Flood Extents - Wet Day

Data: Environment Agency, IGP, 2025
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Application Doc No.: EN010168/APP/7.2

Drawing no.: P4443_LPR_ZZ_XX_DR_Z_SEQ_0288

Coordinate system: British National Grid

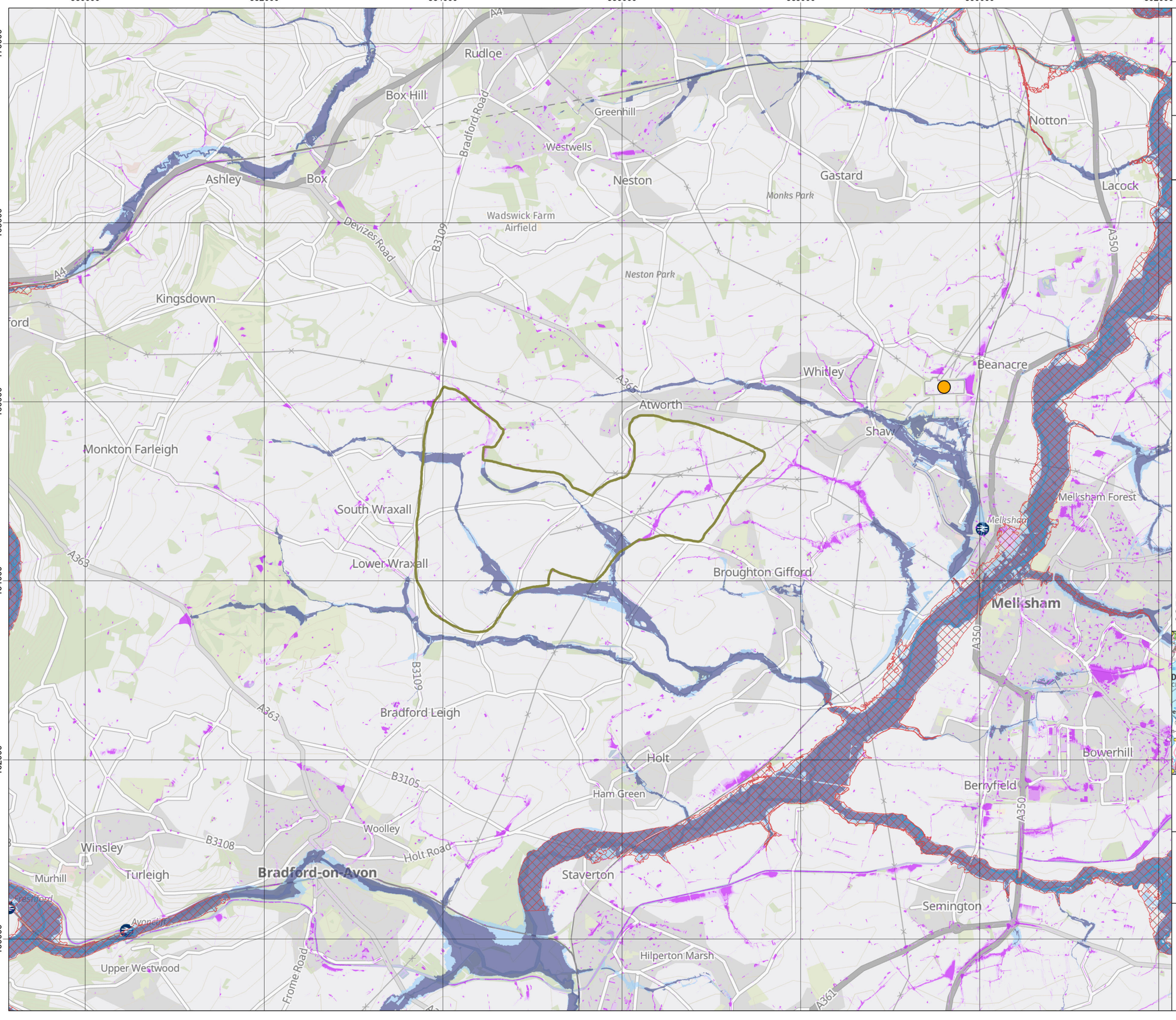
Scale: 1:40,000 @ A3

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Island GREEN POWER

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Lime Down Solar Park

Title:
Figure 8: Potential Development Area 6 Flood Risk

Document:
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Legend:

- Existing National Grid Melksham Substation (PoC)

Potential Development Area (PDA)

- PDA 6
- Flood Zone 2
- Flood Zone 3

Risk of Flooding from Surface Water

Flood Likelihood Category

- High
- Medium
- Low
- Reservoir Flood Extents - Fluvial Contribution
- Reservoir Flood Extents - Dry Day
- Reservoir Flood Extents - Wet Day

Data: Environment Agency, IGP, 2025
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Coordinate system: British National Grid

Scale: 1:40,000 @ A3

N
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0 1 2 km

Island GREEN POWER

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Lime Down Solar Park

Title:
Figure 9: Potential Development Area 7 Flood Risk

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- Sequential and Exception Test
Planning Statement

Legend:

- Existing National Grid Melksham Substation (PoC)

Potential Development Area (PDA)

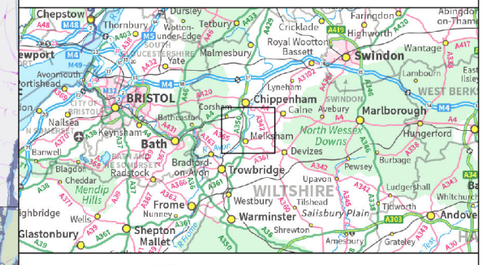
- PDA 7
- Flood Zone 2
- Flood Zone 3

Risk of Flooding from Surface Water

Flood Likelihood Category

- High
- Medium
- Low
- Reservoir Flood Extents - Fluvial Contribution
- Reservoir Flood Extents - Dry Day
- Reservoir Flood Extents - Wet Day

Data: Environment Agency, IGP, 2025
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Drawing no.: P4443_LPR_ZZ_XX_DR_Z_SEQ_0288

Coordinate system: British National Grid

Scale: 1:40,000 @ A3

N W E S

0 1 2 km

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Lime Down Solar Park

Title:
Figure 10: Potential Development Area 8 Flood Risk

Document:
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- Sequential and Exception Test
Planning Statement

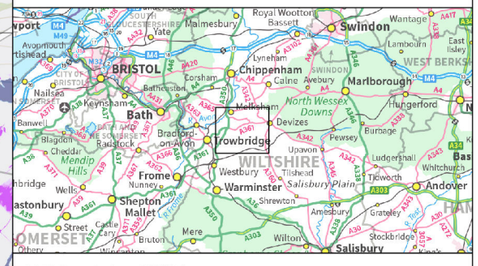
Legend:

Potential Development Area (PDA)
- PDA 8
- Flood Zone 2
- Flood Zone 3

Risk of Flooding from Surface Water

Flood Likelihood Category
- High
- Medium
- Low
- Reservoir Flood Extents - Fluvial Contribution
- Reservoir Flood Extents - Dry Day
- Reservoir Flood Extents - Wet Day

Data: Environment Agency, IGP, 2025
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Coordinate system: British National Grid

Scale: 1:40,000 @ A3

0 1 2 km

Island GREEN POWER

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394000 396000 398000 400000 402000 404000

170000 168000 166000 164000 162000 160000

Bowood Park
Quemerford
Blackland Park
Cherhill D
Devizes Road
Wires Plain
A3102
Bowden Park
Bewley Common
Bowden Hill
Sandy Lane
Spye Park
North Down
A361
Bishop's Car Down
Devizes Road
Heddington
Westbrook
Bromham
A3102
Sandridge Park
A3102
Bromham Common
Bishops Cannings
Horton
Tanis
Rowde
A365
Sells Green
B3101
Coate
Seend
A361
Devizes
A361
Nursteed Road
end Cleeve
A361
A360
Etchilhampton
Poulshot
Stert
Lydeway

Lime Down Solar Park

Title:
Figure 11: Potential Development Area 9 Flood Risk

Document:
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Legend:

Potential Development Area (PDA)
- PDA 9

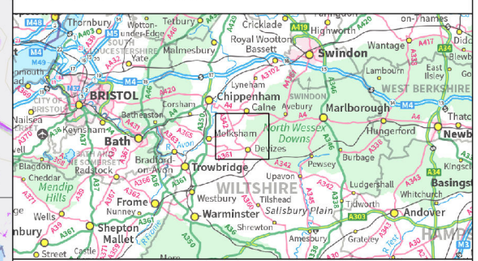
- Flood Zone 2
- Flood Zone 3

Risk of Flooding from Surface Water

Flood Likelihood Category
- High
- Medium
- Low

- Reservoir Flood Extents - Fluvial Contribution
- Reservoir Flood Extents - Dry Day
- Reservoir Flood Extents - Wet Day

Data: Environment Agency, IGP, 2025
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Coordinate system: British National Grid

Scale: 1:40,000 @ A3

N W E S

0 1 2 km

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Lime Down Solar Park

Title:
Figure 12: Potential Development Area 10 Flood Risk

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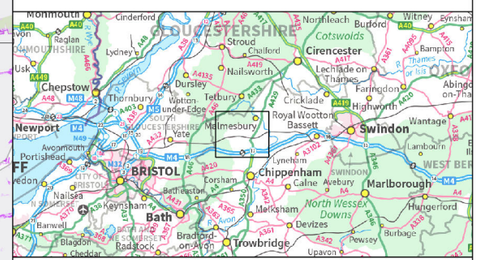
Legend:

Potential Development Area (PDA)
- PDA 10
- Flood Zone 2
- Flood Zone 3

Risk of Flooding from Surface Water

Flood Likelihood Category
- High
- Medium
- Low
- Reservoir Flood Extents - Fluvial Contribution
- Reservoir Flood Extents - Dry Day
- Reservoir Flood Extents - Wet Day

Data: Environment Agency, IGP, 2025
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Drawing no.: P4443_LPR_ZZ_XX_DR_Z_SEQ_0288

Coordinate system: British National Grid

Scale: 1:40,000 @ A3

0 1 2 km

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Lime Down Solar Park

Title:
Figure 13: Potential Development Area 11 Flood Risk

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Planning Statement

Legend:

Potential Development Area (PDA)

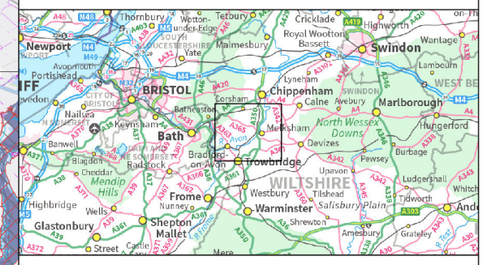
- PDA 11
- Existing National Grid Melksham Substation (PoC)
- Area of Search
- Flood Zone 2
- Flood Zone 3

Risk of Flooding from Surface Water

Flood Likelihood Category

- High
- Medium
- Low
- Reservoir Flood Extents - Fluvial Contribution
- Reservoir Flood Extents - Dry Day
- Reservoir Flood Extents - Wet Day

Data: Environment Agency, IGP, 2025
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Coordinate system: British National Grid

Scale: 1:50,000 @ A3

0 1 2 km

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Lime Down Solar Park

Title:
Figure 14: Potential Development Area Flood Risk

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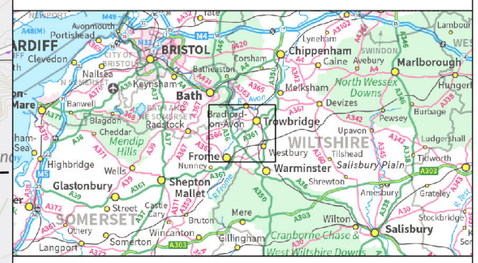
Legend:

Potential Development Area (PDA)
- PDA 12
- Area of Search
- Flood Zone 2
- Flood Zone 3

Risk of Flooding from Surface Water

Flood Likelihood Category
- High
- Medium
- Low
- Reservoir Flood Extents - Fluvial Contribution
- Reservoir Flood Extents - Dry Day
- Reservoir Flood Extents - Wet Day

Data: Environment Agency, IGP, 2025
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Drawing no.: P4443_LPR_ZZ_XX_DR_Z_SEQ_0288

Coordinate system: British National Grid

Scale: 1:50,000 @ A3

0 1 2 km

Island GREEN POWER

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Appendix B: Potential Development Area Assessment Results

Table 1: Assessment Results for PDAs assessed at Stage 2.

Indicator	Potential Development Area 1		Potential Development Area 2		Potential Development Area 3		Potential Development Area 4	
PDA Size (ha)	256.03		243.34		932.51		485.43	
PDA Description	Lyneham		East of Melksham		Marston		Trowbridge/Westbury	
Indicator	**RAG**	**Justification**	**RAG**	**Justification**	**RAG**	**Justification**	**RAG**	**Justification**
Fluvial		A small section of a watercourse (approximately 120m) is within the PDA boundary adjacent to Trow Lane. According to the EA's Flood Map for Planning (updated March 2025), PDA 1 is largely within Flood Zone 1. One of the two separate land parcels within PDA 1 has areas within Flood Zone 3. PDA 1 is also bordered by areas of Flood Zone 2 and 3 immediately to the north relating to Main Rivers 'The Bourne' and 'Dauntsey Brook'. Flood Zone 3 covers a total of 3.77 hectares or 1.47% of the PDA.		Clackers Brook (a main river and tributary of the River Avon) runs in between the two land parcels which comprise PDA 2. According to the EA's Flood Map for Planning (updated March 2025), PDA 2 is largely within Flood Zone 1. However, both land parcels in PDA 2 have small areas within Flood Zone 3. The northern parcel has extents which encroach from the west, associated with a tributary of the River Avon, whereas the extents of Flood Zone 3 merely clip the southern parcel, associated with Clackers Brook. Flood Zones 2 and 3 are also present immediately adjacent to the boundary. Flood Zone 3 covers a total of 3.63 hectares or 1.49% of the PDA.		According to the EA's Flood Map for Planning (updated March 2025), PDA 3 is largely within Flood Zone 1. Three of four of the land parcels in PDA 3 have areas within Flood Zone 3. PDA 3 is surrounded by various Main Rivers including multiple Tributaries of Semington Brook. Flood Zones 2 and 3 clip the northernmost and southernmost parcels (parcels most proximal to Worton and Great Cheverell, respectively), the PDA is largely within Flood Zone 1. Flood Zones 2 and 3 extend further into the extents of the central (largest) parcel within the PDA. There are also areas of Flood Zone 2 and 3 immediately adjacent to the boundary. Flood Zone 3 covers a total of 9.68 hectares or 1.04% of the PDA.		According to the EA's Flood Map for Planning (updated March 2025), PDA 4 is largely within Flood Zone 1. All three land parcels within PDA 4 have areas within Flood Zone 3. PDA 4 is surrounded by various Main Rivers including multiple tributaries of the River Biss to the west and Semington Brook to the east. There are two small areas where the rivers infringe on the PDA boundary. Flood Zone 3 covers a total of 5.32 hectares or 1.1% of the PDA.
Surface Water		According to the EA's Risk of Surface Water Flooding (RoFSW) map (updated January 2025), PDA 1 is shown to have varying risk levels of surface water risk, with large sections of the PDA shown to have High risk (≥3.3% annual probability) of surface water flooding, with particular focus on an area located in the north of the PDA boundary, between Sodom and Hunters hall. The extents of the surface water flood risk across the sites largely concur with existing land drains /		According to the EA's Risk of Surface Water Flooding (RoFSW) map (updated January 2025), northern parcel of PDA 2 is intersected by a large area at high risk from surface water flooding (≥3.3% annual chance), whilst the southern parcel has a smaller area near to Rowde Croft Farmhouse. The extents of the surface water flood risk across the two parcels are shown to largely concur with the existing land drains / watercourses which run through the wider area. The sections of the watercourses which are shown within the RoFSW		According to the EA's Risk of Surface Water Flooding (RoFSW) map (updated January 2025) PDA 3 is largely at Very Low (<0.1% annual probability) risk of surface water flooding, with some areas at High risk (≥3.3% annual probability) of surface water flooding. The extents of the surface water flood risk across the sites largely concur with topographic lows and minor depressions within the agricultural fields present across the parcels. There are also some flow routes shown as present across the parcels, where not associated with		According to the EA's Risk of Surface Water Flooding (RoFSW) map (updated January 2025), PDA 4 is largely at Very Low (<0.1% annual probability) risk of surface water flooding, with some areas at High risk (≥3.3% annual probability) of surface water flooding. The extents of the surface water flood risk across the parcels largely concur with existing unmodelled watercourses (northern and –south-western parcels) and field boundaries (eastern parcel). There is also ponding along roads present within the parcels (such as the A350 running through

Indicator	Potential Development Area 1		Potential Development Area 2		Potential Development Area 3		Potential Development Area 4	
		watercourses which run through the PDA and the wider area, or field boundaries.		mapping are unmodelled and so are not mapped on the EA Flood Map for Planning. Other areas shown to be at risk are associated with field boundaries (topographic lows).		watercourses shown on the Flood Map for Planning, these are considered to be associated with unmodelled watercourses / land drains within the PDA.		the northern parcel), and along the railway line present within the eastern parcel.
Groundwater		British Geological Survey (BGS) Geology Mapping indicates PDA 1 has sparse superficial geology which comprises Alluvium. Soilscapes mapping (Ref 15) indicates that the northern parcel of PDA 1 is located in 'slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils' with impeded drainage. The southern parcel is located in freely draining 'shallow lime-rich soils over chalk or limestone' soils. For a solar scheme where development will require temporary occupation and no below-ground infrastructure, PDA 1 is not considered to be at risk of groundwater flooding. For site-specific information on groundwater information, an appropriate site investigation to include groundwater monitoring would be required, which is beyond the scope of this report (see paragraph 3.1.4).		BGS Geology Mapping indicates PDA 2 has sparse superficial geology which comprises Alluvium and Head. Soilscapes mapping indicates that PDA 2 is located in 'slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils' with impeded drainage. For a solar scheme where development will require temporary occupation and no below-ground infrastructure, PDA 1 is not considered to be at risk of groundwater flooding. For a solar scheme where development will require temporary occupation and no below-ground infrastructure, PDA 2 is not considered to be at risk of groundwater flooding. For site-specific information on groundwater information, an appropriate site investigation to include groundwater monitoring would be required, which is beyond the scope of this report (see paragraph 3.1.4).		BGS Geology Mapping indicates PDA 3 has sparse superficial geology which comprises Alluvium and Head. Soilscapes mapping indicates that PDA 3 is located in soils with a varying range of permeability, areas in closest proximity to the watercourses within the sites are shown to have naturally wet drainage and are expected to have higher groundwater levels. For a solar scheme where development will require temporary occupation and no below-ground infrastructure, PDA 3 is not considered to be at risk of groundwater flooding. For site-specific information on groundwater information, an appropriate site investigation to include groundwater monitoring would be required, which is beyond the scope of this report (see paragraph 3.1.4).		BGS Geology Mapping indicates PDA 4 has sparse superficial geology which comprises Alluvium and Head. Soilscapes mapping indicates that PDA 4 is located in soils with a varying range of permeability. For a solar scheme where development will require temporary occupation and no below-ground infrastructure, PDA 4 is not considered to be at risk of groundwater flooding. For site-specific information on groundwater information, an appropriate site investigation to include groundwater monitoring would be required, which is beyond the scope of this report (see paragraph 3.1.4).
Sewers		PDA 1 is largely agricultural, greenfield (undeveloped) land with some small developed areas mainly comprising residential dwellings, agricultural buildings and roads. Therefore, there may be private drainage systems and / or public foul or surface water sewers present within the PDA boundary. There is also a solar development present within PDA 1.		PDA 2 is largely agricultural, greenfield (undeveloped) land with some small developed areas mainly comprising residential dwellings and agricultural buildings. Therefore, there may be private drainage systems and / or public foul or surface water sewers present within the PDA boundary. There is also a solar development present within PDA 2.		PDA 3 is largely agricultural, greenfield (undeveloped) land with some small developed areas mainly comprising residential dwellings, agricultural buildings and roads. Therefore, there may be private drainage systems and / or public foul or surface water sewers present within the PDA boundary.		PDA 4 is largely agricultural, greenfield (undeveloped) land with some small developed areas mainly comprising residential dwellings, agricultural buildings and roads. Therefore, there may be private drainage systems and / or public foul or surface water sewers present within the PDA boundary.
Artificial		According to the EA's Reservoir Flood Extents Mapping, the PDA is partially within the extents of a reservoir failure during both the wet-day (when there is also flooding from rivers) and dry-day (when local rivers are at normal levels) scenarios. It should be noted that the mapping represents a prediction of a credible worst-case		According to the EA's Reservoir Flood Extents Mapping, the PDA is outside the extents of a reservoir failure. There are no canals present within or in the vicinity of the PDA.		According to the EA's Reservoir Flood Extents Mapping, the PDA is outside the extents of a reservoir failure. There are no canals present within or in the vicinity of the PDA.		According to the EA's Reservoir Flood Extents Mapping, the PDA is outside the extents of a reservoir failure. There are no canals present within or in the vicinity of the PDA.

Indicator	Potential Development Area 1		Potential Development Area 2		Potential Development Area 3		Potential Development Area 4	
		scenario, however it's unlikely that any actual flood would be this large. There are no canals present within or in the vicinity of the PDA.						

Table 2: Assessment Results for PDAs assessed at Stage 4.

Indicator	Potential Development Area 5		Potential Development Area 6		Potential Development Area 7		Potential Development Area 8		Potential Development Area 9		Potential Development Area 10	
PDA Size (ha)	461.4		528.7		272.3		520.6		849.6		878	
PDA Description	Whitley		Wraxall		Lacock		Inmarsh		Rowdefield		Lime Down (the Scheme)	
Indicator	**RAG**	**Justification**	**RAG**	**Justification**	**RAG**	**Justification**	**RAG**	**Justification**	**RAG**	**Justification**	**RAG**	
Fluvial		According to the EA's Flood Map for Planning (updated March 2025), PDA 5 is mostly within Flood Zone 1 with small sections of Flood Zone 3 located in its most southwestern tip. There are no main rivers within this PDA boundary however the South Brook tributary runs approximately 100 m from the southern border of the PDA. There are no other main rivers within 500 m. Flood Zone 3 covers a total of 2.16 hectares or 0.47% of the PDA.		According to the EA's Flood Map for Planning (updated March 2025), PDA 6 is mostly within Flood Zone 1 with areas of Flood Zone 3 which reflect the presence of tributaries of the River Avon. There are no other main rivers within 500 m of the boundary. Flood Zone 3 covers a total of 25.08 hectares or 4.74% of the PDA.		According to the EA's Flood Map for Planning (updated March 2025), both of the two land parcels within PDA 7 have areas within Flood Zone 3. Flood Zone 3 encroaches into significant areas of the western extents of the larger parcel and the eastern extents of the smaller parcel, associated with the River Avon (main river) which runs directly parallel to the entire PDA. Two tributaries of the Avon (also main rivers) span across the site. There are no other main rivers within 500 m. Flood Zone 3 covers a total of 60.47 hectares or 22.2% of the PDA.		According to the EA's Flood Map for Planning (updated March 2025), PDA 8 is made up of large areas of Flood Zones 2 and 3 associated with Semington Brook (main river) which runs directly through the centre of PDA 8 and Summerham Brook. There are multiple tributaries of Semington Brook within 500 m of the PDA boundary. Flood Zone 3 covers a total of 59.73 hectares or 11.47% of the PDA.		PDA 9 has a small section of Flood Zone 3 encroaching on the boundary associated with the centre of its western edge of the PDA. There are no main rivers in PDA 9 although some smaller tributaries of Summerton Brook run through the boundary. The nearest main river is Summerton Brook located approximately 250 m from the boundary. There are no other main rivers within 500 m. According to the EA's Flood Map for Planning (updated March 2025), PDA 9 is mostly within Flood Zone 1 with a small area within Flood Zone 3 in the west which reflects the presence of Rowde Ford. Flood Zone 3 covers a total of 19.31 hectares or 2.27% of the PDA.		According to the EA's Flood Map for Planning (updated March 2025), four of the six separate land parcels within PDA 10 have areas within Flood Zone 3, associated with Gabriel's Well, Gauze Brook (main river), a small tributary of Sherston Branch (non-main river) and a small tributary of the River Avon (main river) which intersect small sections of this PDA. There is also a section of Sherston Branch within 200 m of the land parcel closest to Sherston. The Sites are largely outside of Flood Zones 2 and 3 with Flood Zones 2 and 3 mostly reflecting the channels of the existing watercourses. Flood Zone 3 covers a total of 26.43 hectares or 3.01% of the PDA.
Surface Water		According to the EA's Risk of Surface Water		According to the EA's Risk of Surface Water Flooding		According to the EA's Risk of Surface Water Flooding		According to the EA's Risk of Surface Water Flooding		According to the EA's Risk of Surface Water Flooding		According to the EA's Risk of Surface Water Flooding

Indicator	Potential Development Area 5	Potential Development Area 6	Potential Development Area 7	Potential Development Area 8	Potential Development Area 9	Potential Development Area 10
	Flooding (RoFSW) map (updated January 2025), PDA 5 is largely at Very Low (<0.1% annual probability) of surface water flooding, with some small areas of Low to High risk (0.1 - ≥3.3% annual probability) of surface water flooding, however these areas are very limited.	(RoFSW) map (updated January 2025), the PDA is largely at Very Low (<0.1% annual probability) of surface water flooding, with areas of Low to High risk of surface water flooding, with some small areas of Low to High risk (0.1 - ≥3.3% annual probability) of surface water flooding, however these areas are limited to the north and east. The extents of the surface water flood risk across the sites largely concur with existing unmodelled land drains / watercourses which run through the wider area.	(RoFSW) map (updated January 2025), there are some significant areas shown to be at Very Low (<0.1% annual probability) risk of surface water flooding, however there are also some significant areas of High risk (≥3.3% annual probability) of surface water flooding. There are a high number of fluvial constraints in PDA 7; the extents of the surface water flood risk across the sites largely concur with the presence of the River Avon (present down the western side) and its tributaries and align with the extents of the Flood Zones as described above.	(RoFSW) map (updated January 2025), there are some significant areas shown to be at Very Low (<0.1% annual probability) risk of surface water flooding, however there are also some significant areas of High risk (≥3.3% annual probability) of surface water flooding. There are a high number of fluvial constraints in PDA 8; the extents of the surface water flood risk across the sites largely concur with the presence of Semington Brook and Summerham Brook and align with the outlines of Flood Zones as described above.	(RoFSW) map (updated January 2025), the sites are largely at Very Low (<0.1% annual probability) risk of surface water flooding (particularly in the eastern and northern extents), with areas of Low to High risk of surface water flooding mainly concentrated in the western and southern extents. The extents of the surface water flood risk across the sites largely concur with existing land drains / watercourses which run through the wider area.	(RoFSW) map (updated January 2025), the sites are largely at Very Low (<0.1% annual probability) risk of surface water flooding, with areas of Low to High risk of surface water flooding in some topographically low points, or in areas consistent with the presence of watercourses / flowpaths associated with land drains.
Groundwater	BGS Geology Mapping indicates PDA 5 does not have superficial geology, with the exception of a small area at the north-eastern boundary which comprises Head deposits. Soilscapes mapping indicates that PDA 5 is largely located in freely draining 'shallow lime-rich soils over chalk or limestone', with some 'slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils' and 'freely draining lime-rich loamy soils' in the eastern extents. For a solar scheme where development will require temporary occupation and no below-ground infrastructure, PDA 5 is not considered to be at risk of groundwater flooding. For	BGS Geology Mapping indicates PDA 6 does not have superficial geology, with the exception of a small area at the north-western boundary which comprises Head deposits, and an area in the south comprising Alluvium. Soilscapes mapping indicates that PDA 6 is largely located in freely draining 'shallow lime-rich soils over chalk or limestone', with some 'slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils' in the eastern extents and 'lime-rich loamy and clayey soils with impeded drainage' in the western extents. For a solar scheme where development will require temporary occupation and no below-ground infrastructure, PDA 6 is not	BGS Geology Mapping indicates the site has sparse superficial geology which largely comprises Alluvium and River Terrace Deposits, with a small area of Head deposits in the east. Soilscapes mapping indicates that PDA 7 is largely located in 'slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils' with 'freely draining lime-rich loamy soils' located in the west. Areas in closest proximity to the watercourses within the sites are shown to have naturally wet drainage and are expected to have naturally higher groundwater levels. For a solar scheme where development will require temporary occupation and no below-ground	BGS Geology Mapping indicates the site has sparse superficial geology which comprises Alluvium and Head. Soilscapes mapping indicates that PDA 8 is located in soils with a varying range of permeability, areas in closest proximity to the watercourses within the sites are shown to have naturally wet drainage and are expected to have higher groundwater levels. For a solar scheme where development will require temporary occupation and no below-ground infrastructure, PDA 8 is not considered to be at risk of groundwater flooding. For site-specific information on groundwater information, an appropriate site investigation would be	BGS Geology Mapping indicates the site has superficial geology which comprises Alluvium and Head deposits. Soilscapes mapping indicates that PDA 9 is located in soils with a varying range of permeability. For a solar scheme where development will require temporary occupation and no below-ground infrastructure, PDA 9 is not considered to be at risk of groundwater flooding. For site-specific information on groundwater information, an appropriate sitewould be required, which is beyond the scope of this document.	BGS Geology Mapping indicates the site has sparse superficial geology which largely comprises Alluvium, with small areas of Head deposits. Soilscapes mapping indicates that PDA 10 is located in soils with a varying range of permeability, areas in closest proximity to the watercourses within the sites are shown to have naturally wet drainage and are expected to have higher groundwater levels. For a solar scheme where development will require temporary occupation and no below-ground infrastructure, PDA 1 is not considered to be at risk of groundwater flooding. For site-specific information on groundwater information, an appropriate site investigation would be

Indicator	Potential Development Area 5	Potential Development Area 6	Potential Development Area 7	Potential Development Area 8	Potential Development Area 9	Potential Development Area 10
	site-specific information on groundwater information, an appropriate site investigation would be required, which is beyond the scope of this document.	considered to be at risk of groundwater flooding. For site-specific information on groundwater information, an appropriate site investigation would be required, which is beyond the scope of this document.	infrastructure, PDA 7 is not considered to be at risk of groundwater flooding. For site-specific information on groundwater information, an appropriate site investigation would be required, which is beyond the scope of this document.	required, which is beyond the scope of this document.		required, which is beyond the scope of this document.
Sewers	PDA 5 is largely agricultural, greenfield (undeveloped) land with some small developed areas mainly comprising agricultural buildings and roads. Therefore, there may be private drainage systems and / or public foul or surface water sewers present within the PDA boundary.	PDA 6 is largely agricultural, greenfield (undeveloped) land with some small developed areas mainly comprising agricultural buildings and roads. Therefore, there may be private drainage systems and / or public foul or surface water sewers present within the PDA boundary.	PDA 7 is largely agricultural, greenfield (undeveloped) land with some small developed areas mainly comprising agricultural buildings and roads. Therefore, there may be private drainage systems and / or public foul or surface water sewers present within the PDA boundary.	PDA 8 is largely agricultural, greenfield (undeveloped) land with some small developed areas mainly comprising agricultural buildings and roads. Therefore, there may be private drainage systems and / or public foul or surface water sewers present within the PDA boundary.	PDA 9 is largely agricultural, greenfield (undeveloped) land with some small developed areas mainly comprising agricultural buildings and roads. Therefore, there may be private drainage systems and / or public foul or surface water sewers present within the PDA boundary.	PDA 10 is largely agricultural, greenfield (undeveloped) land with some small developed areas mainly comprising agricultural buildings and roads. Therefore, there may be private drainage systems and / or public foul or surface water sewers present within the PDA boundary.
Artificial	According to the EA's Reservoir Flood Extents Mapping, the PDA is outside the extents of a reservoir failure. There are no canals present within or in the vicinity of the PDA.	According to the EA's Reservoir Flood Extents Mapping, the PDA is outside the extents of a reservoir failure. There are no canals present within or in the vicinity of the PDA.	According to the EA's Reservoir Flood Extents Mapping, the PDA is partially within the extents of a reservoir failure during the wet-day (when there is also flooding from rivers) scenario. It should be noted that the mapping represents a prediction of a credible worst-case scenario, however it's unlikely that any actual flood would be this large. There are no canals present within or in the vicinity of the PDA.	According to the EA's Reservoir Flood Extents Mapping, the PDA is partially within the extents of a reservoir failure during the wet-day (when there is also flooding from rivers) scenario. It should be noted that the mapping represents a prediction of a credible worst-case scenario, however it's unlikely that any actual flood would be this large. The PDA is approximately 650 m south of the Kennet and Avon Canal at its closest point.	According to the EA's Reservoir Flood Extents Mapping, the PDA is outside the extents of a reservoir failure. The PDA is approximately 50 m north of the Kennet and Avon Canal at its closest point.	According to the EA's Reservoir Flood Extents Mapping, the PDA is outside the extents of a reservoir failure. There are no canals present within or in the vicinity of the PDA.

Table 3: Assessment Results for PDAs assessed at Stage 5.

Indicator	Potential Development Area 11	Potential Development Area 12
PDA Size (ha)	492 ha	731 ha

Indicator	Potential Development Area 11		Potential Development Area 12	
PDA Description	Broughton Gifford		Beckington	
Indicator	**RAG**	**Justification**	**RAG**	**Justification**
Fluvial		According to the EA's Flood Map for Planning (updated August 2025), PDA 11 is largely within Flood Zone 1 but partially within Flood Zones 2 and 3. PDA 11 is intersected by several areas of Flood Zone 3 land associated with a tributary (designated as a Main River) of the River Avon. The Main River breaches the southern tip of the more southerly of PDA parcels and is also associated with an Ordinary Watercourse which intersects the parcel near Great Chatfield. Furthermore, there are a number of smaller watercourses located within the PDA boundary.		According to the EA's Flood Map for Planning (updated August 2025), PDA 12 is wholly within Flood Zone 1. There are no main rivers within this PDA boundary and this corresponds with the Flood Map for Planning Flood Zone extents, however it should be noted that there are a number of smaller watercourses located within the PDA boundary.
Surface Water		According to the EA's Risk of Surface Water Flooding (RoFSW) map (updated January 2025), there are some significant areas shown to be at Very Low (<0.1% annual probability) risk of surface water flooding, however there are also some significant areas of High risk (≥3.3% annual probability) of surface water flooding, some of which are associated with fluvial sources. There are a high number of fluvial constraints in PDA 11; the extents of the surface water flood risk across the sites largely concur with the presence of the River Avon (present down the western side) and its tributaries and align with the extents of the Flood Zones as described above. There is large area of surface water flood risk present in the eastern parcel of PDA 11; however, this is associated with smaller land drains in the largely rural area.		According to the EA's Risk of Surface Water Flooding (RoFSW) map (updated January 2025), there are some significant areas shown to be at Very Low (<0.1% annual probability) risk of surface water flooding, however there are also some small areas of Low to High risk (0.1 - ≥3.3% annual probability) of surface water flooding. There are a high number of fluvial constraints in PDA 12; the extents of the surface water flood risk across the sites largely concur with topographic lows and the presence of smaller watercourses within the site.
Groundwater		BGS Geology Mapping indicates the site has sparse superficial geology which comprises River Terrace Deposits, Head and some Alluvium in areas in close proximity to watercourses. Soilscapes mapping indicates that PDA 11 is located in soils with a varying range of permeability, areas in closest proximity to the watercourses within the sites are shown to have naturally wet drainage and are expected to have higher groundwater levels. PDA 11 is largely shown to be located in freely draining soils, with the exception of a smaller area in the northern extents of the PDA which has 'slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils'. For a solar scheme where development will require temporary occupation and no below-ground infrastructure, PDA 11 is not considered to be at risk of groundwater flooding. For site-specific information on groundwater information, an appropriate site investigation would be required, which is beyond the scope of this document. The EA Long Term Flood Risk Mapping service indicates that groundwater flooding is unlikely in this area.		BGS Geology Mapping indicates the site has very sparse superficial geology with just a small amount of Alluvium located in the east of the PDA, this is associated with one of the smaller watercourses present in the PDA. Soilscapes mapping indicates that PDA 12 is located in soils with a varying range of permeability, from having impeded drainage in the north, slightly impeded drainage in the east and south, and a small area of freely draining soils in the central extents. For a solar scheme where development will require temporary occupation and no below-ground infrastructure, PDA 12 is not considered to be at risk of groundwater flooding. For site-specific information on groundwater information, an appropriate site investigation would be required, which is beyond the scope of this document.
Sewers		PDA 11 is largely agricultural, greenfield (undeveloped) land with some small, developed areas mainly comprising agricultural buildings, existing solar infrastructure and roads. Therefore, there may be private drainage systems and / or public foul or surface water sewers present within the PDA boundary.		PDA 12 is largely agricultural, greenfield (undeveloped) land with some small developed areas mainly comprising residential dwellings, agricultural buildings and roads (both A and B roads). Therefore, there may be private drainage systems and / or public foul or surface water sewers present within the PDA boundary.
Artificial		According to the EA's Reservoir Flood Extents Mapping, the PDA is outside the extents of a reservoir failure.		According to the EA's Reservoir Flood Extents Mapping, the PDA is outside the extents of a reservoir failure. There are no canals present within or in the vicinity of the PDA.

Indicator	Potential Development Area 11		Potential Development Area 12	
		There are no canals present within or in the vicinity of the PDA.		

Appendix C: Solar PV Sites Design

386000 388000 390000 392000 394000

186000 184000 182000 180000

Lime Down Solar Park

Title:

Figure 15: Solar PV Sites Layout and Flood Risk

Document:

Volume 7.2
Hydrology, Flood Risk and Drainage
- Sequential and Exception Test
Planning Statement

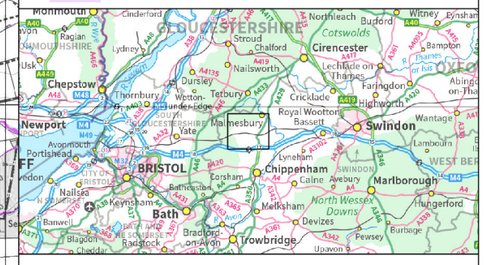
Legend:

- Order Limits
- Cable Route Search Corridor
- Solar PV Access Location
- Solar PV Crossing Location
- Cable Corridor Access Location
- Solar PV Area
- 132kV Substation
- 400kV Substation
- BESS
- Power Blocks
- Access Track
- Flood Zone 2
- Flood Zone 3
- Reservoir Flood Extents - Fluvial Contribution
- Reservoir Flood Extents - Wet Day

Risk of Flooding from Surface Water

Flood Likelihood Category

- High
- Medium
- Low



APFP Regulation: 5(2)(q)

Application Doc No.: EN010168/APP/7.2

Drawing no.: P4443_LPR_ZZ_XX_DR_Z_SEQ_0288

Coordinate system: British National Grid

Scale: 1:30,872 @ A3

N W E S

0 500 1,000 1,500 Metres

Island GREEN POWER

Lanpro

Data: Environment Agency, IGP, 2025
Base map: © Crown copyright and database rights 2025 Ordnance Survey 0100031673.

Lime Down
Solar Park

Annex D: Planning History

Planning History

Any planning applications within a 10km distance of the Order Limits that are deemed to be of relevance to the Scheme are set out below:

Application Reference	Description	Development Type	Distance from the Scheme (approximate at closest point)	Status
PL/2024/00865	Residential development for 45 dwellings, vehicular and pedestrian access including a new footway to Sopworth Lane, associated parking, open space, landscaping, and associated infrastructure.	Residential	1.1 km	Pending Consideration (Validated 22/02/2024)
PL/2021/10696	Proposed erection of a GP Surgery (Class E(e)), car park and associated works (Outline application relating to access)	Commercial	1 km	Approved (22/07/2024)
19/01490/FUL	A Residential Development Comprising 31 Dwellings (Use Class C3), a New Vehicular Access, Public Open Space, Landscaping, Sustainable Urban Drainage and Other Associated Infrastructure Works	Residential	0.5 km	Permitted (10/08/2021)
20/10972/OUT	Outline Planning Application for up to 71 Dwellings, Community Car Park, Land Reserved for Future Expansion of Hullavington CofE Primary School, Access, Open Space, Surface Water Attenuation Basin, Landscaping and Associated Works	Mixed-use	0.1 km	Permitted (07/02/2023)
PL/2022/08742	75 bed modular unit single living accommodation, with supporting kitchen and utility units. New cycle storage shelter and new waste management facility.	Residential	1.2 km	Approved (15/02/2023)
18/08271/OUT	Outline planning application for up to 44,150 sq.m. (GIA) of development, comprising a maximum of 20,000 sq.m. (GIA) of research and development/office floorspace (Class B1 (a) and (b)) and 24,150 sq.m. of ancillary development including test areas, an energy centre, a logistics/storage building, hangar building, staff and customer facilities, and gatehouse, and new access arrangements including a re-aligned section of C1 road and new roundabouts at both the junction of the A429/C1 roads and on the C1 road (all matters reserved except for access).	Mixed-Use	1 km	Approved (23/08/2019)
PL/2024/02998	Development of site to provide 41 Non.residential (Use Class C3) units and associated works including 40% affordable housing, parking provision, highways improvements, off-site ecological enhancement and refuse/recycling stores.	Residential	1.3 km	Pending Consideration (Validated 08/04/2024)
PL/2023/04993	EIA Screening Opinion for the A350 Chippenham Bypass Phase 4 and 5 scheme - Dualling an existing single carriageway at the A350 Chippenham Bypass in order to improve regional connectivity and meet the increased traffic demand that is expected from the A350 growth zone under permitted development rights.	Transport	1.1 km	Approved (08/09/2023)
PL/2022/06908	Full Planning Application for 56 Dwellings, associated parking, public open space, landscaping, access, drainage works and associated infrastructure.	Residential	0.6 km	Approved (16/04/2025)
PL/2024/01560	Laying a section of underground cable linking an approved solar farm (ref: 20/06840/FUL) to the approved cable route within National Grid's land title, together with ancillary work necessary for the implementation of the planning permission. (Melksham Substation)	Energy	0 km	Pending Consideration (Validated 12/02/2024)
PL/2022/09253	Installation of underground cable.	Energy	0 km	Approved (27/04/2023)
19/10628/FUL	The construction of a 10 MW Battery Storage Facility, the formation of a new access, alteration of an existing building, site clearance and other associated works.	Energy	0.3 km	Approved (24/12/2019)
PL/2021/07610	Development of a 20 MW battery storage facility.	Energy	0.3 km	Approved (14/01/2022)
20/08618/FUL	Installation of a solar farm comprising ground mounted solar PV panels with a generating capacity of up to 49.9 MW, including mounting system, battery storage units, inverters, underground cabling, stock proof fence, CCTV, internal tracks and associated infrastructure,	Energy	6 km	Approved (23/08/2023)

Application Reference	Description	Development Type	Distance from the Scheme (approximate at closest point)	Status
	landscaping and environmental enhancements for a temporary period of 40 years and a permanent grid connection hub.			
PL/2021/06100	The installation of a solar farm of up to 49.9 MW of generating capacity, comprising the installation of solar photovoltaic panels and associated infrastructure including customer cabin, customer substation, DNO substation and equipment, inverter and transformer substations (Leigh Delamere Solar Farm).	Energy	1.3 km	Approved (11/08/2022)
PL/2023/04625	Proposed Battery Energy Storage Scheme on Land at Woolley Park Farm, Leigh Road, Trowbridge The Town and Country Planning (Environmental Impact Assessment) Regulations 2017	Energy	5.8 km	EIA Not Required (20/07/2023)
PL/2023/01914	Proposed temporary planning permission for 40 years for the development of a solar farm of up to 24.14 MW of generating capacity, comprising of the installation of solar photovoltaic panels and associated infrastructure including customer cabin, customer substation, DNO substation and equipment, inverter and transformer substations, spare part container, associated battery storage, access tracks, widening of existing highway access, fencing, security cameras, landscape planting, ecological improvements and associated works. The existing agricultural use of the site will also continue in tandem with the solar farm with the grazing of farm animals.	Energy	4.5 km	Pending Consideration (Validated 06/03/2023)
PL/2021/08690	Installation of a solar farm and battery storage facility with associated infrastructure.	Energy	2.4 km	Approved (09/06/2022)
20/06517/SCR	EIA Screening Opinion in relation to the proposed development of solar farm and associated development	Energy	4.6 km	EIA Not Required (17/08/2020)
PL/2022/01695	EIA Screening Opinion for a proposed 20 MW Solar Farm development	Energy	10 km	EIA Not Required (05/07/2022)
20/03528/FUL	Installation of a renewable led energy scheme comprising ground mounted photovoltaic solar arrays and battery-based electricity storage containers together with transformer stations; access; internal access track; landscaping; security fencing; security measures; access gate; and ancillary infrastructure	Energy	9 km	Approved (20/08/2021)
20/05893/SCO	EIA screening/scoping opinion for installation of a solar farm with a 49.9 MW output for a temporary period of 40 years, including battery storage units, associated infrastructure, permanent grid connection hub and environmental enhancements	Energy	6 km	EIA Required (07/10/2020)
20/06840/FUL	Construction of a solar farm and battery storage facility together with all associated works, equipment and necessary infrastructure. PoC at Melksham Substation.	Energy	1.1 km	Approved (17/12/2021)
PL/2023/10077	Construction and operation of a renewable energy park comprising ground mounted solar photovoltaics (PV) together with associated infrastructure, access, landscaping and cabling.	Energy	4.9 km	Refused (20/03/2025)
CH1 - South West Chippeham (Rowden Park Site and Smaller Extension Sites	Rowden Park 1,000 Dwellings 18 ha employment (B1, B2 and B8 Uses) Primary School, Local Centre 100 ha riverside country park Extension Sites 11 ha land for residential development - up to 400 dwellings	Mixed-Use	0.9 km	N/A
CP35 - Methuen Park	Principal Employment Area (WCS) for B1, B2 and B8 Use - up to 26.5 ha of new employment (spread across all 3 Principal Employment Areas in Chippenham)	Employment	0.4 km	N/A
PL/2024/10434	EIA Screening Opinion for proposed battery energy storage scheme of up to c. 50MW	Energy	0.2 km	EIA Not Required (05/02/2025)
PL/2024/06899	Erection of an electrical substation, boundary timber fence and associated planting	Energy	2.9 km	Approved (19/11/2024)

Application Reference	Description	Development Type	Distance from the Scheme (approximate at closest point)	Status
PL/2024/11691	Approval of reserved matters (layout, scale, appearance and landscaping) following outline consent PL/2022/06612 (APP/Y3940/W/322502) for the erection of 70 dwellings together with associated infrastructure and engineering works	Residential	1.2 km	Pending Consideration (Validated 22/01/2025)
PL/2024/09725	Outline Planning application (with all matters except access reserved) for up to 22 dwellings, new access off Corsham Road, Public open space, drainage and associated works.	Residential	0.1 km	Pending Consideration (Validated 28/10/2024)
PL/2024/09454	Erection of a substation.	Energy	3.1 km	Approved (07/05/2025)
PL/2024/10089	EIA Screening Opinion in relation to the proposed development of “Battery Energy Storage Scheme”	Energy	1.3 km	EIA Not Required (07/03/2025)
PL/2024/09410	Construction and operation of a solar farm together with all associated works, equipment and necessary infrastructure.	Energy	0.1 km	Pending Consideration (Validated 29/10/2024)
PL/2023/08481	Development of a solar farm of up to 40MW of export capacity, comprising the installation of solar photovoltaic panels, associated infrastructure and associated works including grid connection. (Eden RB Solar) (Red Barn Solar Farm)	Energy	0.1 km	Approved (31/01/2025)
PL/2021/04515	Construction of a 2 hour duration containerised Battery Storage Facility with the ability to store and export up to 49.99 MW of electricity. The development will comprise 58 single storey steel cabins, known as E - Houses which are 12m long, 2.4m wide and 2.9m high, which house banks of lithium-ion batteries. 12 MV Blocks, also known as the transformers and control gear sit alongside E - Houses. The compound is protected with a 2.5 m high steel mesh fence. The proposed development would replace the approved Minety North substation (Minety North, 17/03936/FUL). (Minety South 2)	Energy	10 km	Approved (08/11/2021)
PL/2022/00664	Proposed Development is for a battery storage facility. The use of the site would change from agricultural to energy infrastructure.	Energy	9.42 km	Approved on Appeal (20/02/2024)
PL/2022/05504	Installation of a Battery Energy Storage System (BESS) together with associated ancillary infrastructure, equipment and access arrangements.	Energy	9.41 km	Approved on Appeal (20/05/2025)
`PL/2022/02824	Proposed Development is for a battery storage facility and ancillary development.	Energy	9.05 km	Approved on Appeal (17/10/2024)
PL/2024/03276	Proposed development of a grid connection cable route for the approved Milou battery energy storage system.	Energy	9.33 km	Approved (21/01/2025)
PL/2025/03530	Full planning application for the demolition of the remaining horticultural nurseries and erection of employment facilities comprising office and product development premises (Class E) and warehouse and light industrial facilities (Class B2 and B8). Ancillary uses include a mobility hub, café, and accommodation, together with landscaping, drainage, and other associated works.	Mixed-Use	0.2 km	Pending Consideration (Validated 16/04/2025)
PL/2025/02785	EIA Screening Opinion for Proposed Battery Energy Storage System and Associated Infrastructure	Energy	1.2 km	EIA not required 08/04/2025

Lime Down
Solar Park

Annex E: Cotswolds National Landscape Policy and Guidance Accordance Note (Clean)

October 2026

Revision 3

Planning Inspectorate Reference: EN010168

Document Reference: [APP-267]

The Infrastructure Planning (Examination Procedure) Rules 2010

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1 Introduction and Purpose

1.1.1 An application (the 'Application') was made to the Secretary of State for Energy Security and Net Zero for a Development Consent Order (DCO) under section 37 of the Planning Act 2008 (PA 2008) for the Lime Down Solar Park (the 'Scheme'). The Application was submitted by Lime Down Solar Park Limited (the 'Applicant') on 19 September 2025 and was accepted for examination on 17 October 2025. The examination into the Application commenced on 21 April 2026.

1.1.2 The Cotswolds National Landscape Board ('the Board') submitted a relevant representation on 12 January 2026. This representation outlines a number of publications, including policies which are recommended for consideration by the Secretary of State in reaching their decision on the Application.

1.1.3 This Annex provides an overview of the Board's publications and demonstrates where the relevant policies have been considered within the design of the Scheme. The relevant publications are as follows:

- Cotswolds National Landscape Management Plan 2025-2030
- Cotswolds National Landscape Board Position Statement – Renewable Energy (2023)
- Cotswolds Conservation Board Position Statement – Development in the setting of the Cotswolds AONB (2016)
- Cotswolds Conservation Board Position Statement – Tranquillity (2019)
- Cotswolds Conservation Board Position Statement – Dark Skies and Artificial Light (2019)
- Cotswolds Conservation Board Position Statement – Woodland Creation and Tree Planting in the Cotswold AONB - Tree Species and Provenance (2023)

2 Cotswolds National Landscape Management Plan

2.1.1 The management plan was adopted in 2025 and sets out the vision, outcomes and policies for the management of the Cotswolds National Landscape (CNL) for the period 2025-2030. The management plan sets out fourteen outcomes and relevant policies to conserve and enhance the natural beauty of the CNL.

2.1.2 The Cotswolds National Landscape Management Plan (CNLMP) is a key resource to help developers assess the sensitivity of landscape character to development. The CNLMP has been produced by the Board, who has two statutory purposes:

1. To conserve and enhance the natural beauty of the Cotswolds National Landscape.

2. To increase the understanding and enjoyment of the special qualities of the Cotswolds National Landscape.

2.1.3 The core of the plan is made up of four components:

- Vision;
- Key Issues;
- Special qualities (SQs); and
- Outcomes and policies.

2.1.4 The CNMLP includes three categories of policies. The Board's response specifically refers to policies listed within **Section 6 – Conserving and Enhancing** which relates to the protection and management of the physical fabric of the CNL. The policies listed within the Board's response for consideration include;

- Policy CE1: Landscape
- Policy CE5: Tranquillity
- Policy CE6: Dark Skies
- Policy CE8: Nature Recovery and Biodiversity
- Policy CE13: Development and infrastructure – principles

2.1.5 The following sections outlines how the design of the Scheme complies with these policies.

2.2 Policy CE1: Landscape

2.2.1 Policy CE1 of the CNLMP 2025-2030 states that:

Policy CE1: Landscape

CE1.1. Proposals that have the potential to impact on, or create change in, the landscape of the Cotswolds National Landscape (CNL), should be delivered in a way that is compatible with and seek to further the conservation and enhancement of the landscape character of the location, as described by the CNL Board's Landscape Character Assessment and Landscape Strategy and Guidelines. There should be a presumption against the loss of key characteristics identified in the landscape character assessment.

CE1.2. Proposals that have the potential to impact on, or create change in, the landscape of the CNL, should seek to further the conservation and enhancement of the scenic quality of the location and its setting, views, including those into and out of the National Landscape and visual amenity.

CE1.3. Conserving and enhancing landscape character should be a key objective of Environmental Land Management and rural development support mechanisms in the Cotswolds National Landscape.

CE1.4. Rural skills training and the utilisation of those skills – such as dry stone walling, stone-masonry, woodland creation and management and hedge laying – should be supported to ensure the long term retention, creation and management of the key features of the Cotswolds National Landscape.

Conservation and enhancement of the Cotswolds National Landscape

2.2.2 **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** and **ES Volume 3, Appendix 8-6: Assessment of the Effects on the Cotswolds National Landscape and its Special Qualities [REP6B-006]** sets out how the Scheme would 'seek to further' the purpose of the CNL to conserve and enhance its natural beauty.

2.2.3 In support of this, the assessment of the landscape impacts associated with the Scheme has been undertaken with reference to a suite of relevant local and national policies, strategies and guidelines, including the Board's Landscape Character Assessments (LCAs) and CNLMP as set out within Section 8.3 and Section 8.7 of **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]**.

2.2.4 Paragraph 8.10.120 of **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** states that the landscape assessments set out the landscape baseline for the CNL and Sites A-C (parts of which are within its setting) with reference to the CNL LCAs and the North Wiltshire LCA (refer to **ES Volume 3, Appendix 8-4 Landscape Character Area Descriptions [APP-195]** for a full description of the relevant LCAs included in the landscape assessment). Paragraph 8.10.121 concludes

that due to the Scheme having no physical overlap within the CNL, there are no direct impacts on the CNL. The landscape assessment recorded Moderate Significant Beneficial effects on the Landscape Fabric of the Site and Moderate Significant Adverse effects within the 1km Local Study Area of the Scheme. These beneficial effects to the Landscape Fabric of the Site are derived from the implementation of extensive mitigation measures embedded in the Scheme design which includes protection of the existing features of the Site and new planting, including trees, hedgerows and woodland, as well as improvements to watercourses and the extensive change in land use to grassland under solar panels and the conversion to grassland meadows on the edge of the CNL as shown on **ES Volume 2, Figure 3-4 Landscape and Ecology Mitigation Plan [REP6B-009]** and summarised below (refer to paragraph 2.2.9 of this Annex).

2.2.5 In terms of the setting of the CNL, paragraph 8.10.122 of **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** sets out that the avoidance measures adopted (avoiding development adjacent to the National Landscape where it would affect its setting and avoiding development where it would be visually intrusive and affect the character and visual experience of the landscape) prevent harm to the CNL and also provide opportunities for positive enhancement within the setting of the CNL. These measures contribute to the substantial increase in vegetation across the Scheme.

2.2.6 Notably, paragraph 8.10.123 of **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** states that the significant adverse effects within the 1km local study area are primarily related to the change in land use from agriculture to the solar farm and that this change does not directly affect the CNL as the buffer to the development provided by the avoidance measures and layers of proposed mitigation planting contains the development away from the edge of the CNL. As such, the development would be barely discernible from within the CNL. This change does not directly affect the CNL or its setting as the buffer to the development provided by the avoidance measures restricts the development away from the land within the setting of the CNL. As such there are no Significant Adverse effects to landscape character for land either within the CNL or within its setting. Harm to the CNL itself would be minimal, (lasting as long as it takes for the planting to become appropriately established) with beneficial landscape effects within the setting of the CNL having effect in the long term, including as a legacy landscape benefits following decommissioning of the Scheme, which would further the purposes of the designation.

2.2.7 The visual effects of the Scheme on the CNL is set out in paragraphs 8.10.124 to 8.10.130 of **ES Volume 1, Chapter 8: Landscape and**

Visual [REP6B-004].Table 10 of **ES Volume 3, Appendix 8-6: Assessment of the Effects on the Cotswolds National Landscape and its Special Qualities [REP6B-006]** summarises these visual effects, concluding that significant visual effects would be experienced by 2 private receptors, 1 public receptor and two transport receptors during construction and at Year 1 Operation. All of these significant effects would fall away in Operation Year 15 and at decommissioning once landscaping has become established.

2.2.8 In terms of landscape and visual impacts of the Cable Route Corridor (CRC) on the CNL, paragraph 2.4.29 and 2.4.32 of **ES Volume 3, Appendix 8-6: Assessment of the Effects on the Cotswolds National Landscape and its Special Qualities [REP6B-006]** states that there would be no direct effects on landscape character within the CNL and no significant visual effects on the CNL due to the CRC not being present within the CNL and due to the short term and temporary nature of the works associated with the installation of the Cable Route Corridor.

2.2.9 To avoid and reduce impacts and effects on the CNL as far as practicably possible, the Scheme has been designed with embedded mitigation measures as set out within paragraph 8.10.134 of **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** and Section 2.3 of **ES Volume 3, Appendix 8-6: Assessment of the Effects on the Cotswolds National Landscape and its Special Qualities [REP6B-006]**. In addition, the construction, operation and decommissioning of the Scheme would be appropriately controlled in order to manage and minimise potential environmental effects. These embedded mitigation measures are summarised as follows:

- Avoidance – Avoidance measures to avoid harm to the CNL through the use of significant buffers to the CNL boundary where Sites A, B and C are within its setting and to maintain views to and from the CNL such as Alderton and Sherston Church. In addition to the avoidance of infrastructure proposed at application submission, this includes the further removal of panels from the entirety of field A1 and field C9 following consultation with the Cotswold National Landscape Board during examination;
- Protection – Buffers and offsets have been embedded into the design of the Scheme to protect the existing landscape fabric of the Sites within the setting of the CNL (and throughout the wider Scheme);
- Retention and Enhancement – Retention and enhancement of the existing landscape framework to gap up existing hedgerows and provide new tree lines to increase age and species diversity. The embedded mitigation also includes new planting to both mitigate the visual effects of the Scheme and provide landscape benefits. This

includes the re-establishment of historic hedgerows within the setting of the CNL, new areas of native woodland, trees, scrub and grassland, new planting within riparian corridors to enhance rivers and wetland, as well the restoration of dry-stone walls and creation of new ponds; and

- Positive Enhancements – Positive enhancements to further the purpose of the CNL are incorporated into the Scheme, particularly within avoidance areas. This includes:
  - The creation of wildflower meadows on the edge of the CNL within the northern part of A1, C1, C6, C8, the southwestern part of C9 and B12.
  - The creation of wildflower meadow verges on the edge of set aside land in A11, A12 and C10 to provide attractive buffers in views from public roads on the edge of the CNL; and
  - Maintaining hedgerows at their current height of c1.5m (or as existing if greater) bordering the CNL within Site C (including the northern boundary of C1 to maintain open views of the landscape within the setting of the CNL.

2.2.10 The Scheme has been carefully designed to respond positively to the landscape character of the CNL and have regard to its setting along with views in and out of the CNL and visual amenity. Mitigation measures have been embedded into the Scheme design to ensure CNL's natural beauty is protected and enhanced, thus supporting the long-term conservation of the designation.

Environmental Land Management schemes

2.2.11 This Annex does not consider Policy CE1.3 as it relates to Environmental Land Management schemes which is a government initiative aimed at farmers and land managers to support sustainable practices.

Rural skills support to sustain key features of the Cotswolds National Landscape

Agricultural Workers and Land Management

2.2.12 As set out in **ES Volume 1, Chapter 16: Socio-economics, Tourism and Recreation [APP-068],** there is anticipated to be a reduction of up to 20 FTE jobs in the agricultural sector as a result of direct effects on farmers and indirect effects on suppliers.

2.2.13 Section 5.3 of the **Outline Skills, Supply Chain and Employment Plan [REP3-104REP3-104]** sets out that the Applicant would prioritise local recruitment for onsite work. This includes:

- Contacting local authorities, Job Centre Plus and other local initiatives operating within the 20km Study Area to establish available local networks of potential employees for the Scheme.
- Utilising local recruitment companies operating within the 20km Study Area that can target employment opportunities for the Scheme by placing advertisements in local papers and shops or services.
- Exploring available opportunities to support agricultural workers in moving to diversified agricultural practices (such as sheep rearing and grazing) that can be continued alongside the operation of the Scheme.

Therefore, the Applicant is committed to engage with local networks to establish opportunities for local employees.

2.2.14 **9.1 Applicant's Response to Relevant Representations (Part 1) [PDA-009]** confirms that land agreements have been made with landowners who have their own contractual agreements with tenant farmers. Whilst a worst case could involve the termination of an agricultural tenancy or contract in its current form, alternative operational and management opportunities are available connected to the Scheme should consent be granted. These opportunities are to be offered to existing tenants and contractors as a primary alternative. Additionally, where available, and at the discretion of the landowner, alternative land would be sought for tenants to continue their agricultural practices. The Applicant is cognisant of the impact the Scheme could have on wider agricultural employment associated with tenancies and contracts and so seeks to source ways of retaining agricultural workers, providing reskilling opportunities, or providing re-employment as supported by the measures secured in the **Outline Skills, Supply Chain and Employment Plan [REP3-104]**.

2.2.15 Therefore, the Applicant acknowledges that the Scheme could have an effect on agricultural workers, however, opportunities and alternative land are to be offered to mitigate these effects and ensure that the agricultural sector can sufficiently operate.

Dry-Stone Walling

2.2.16 **ES Volume 3, Appendix 8-6: Assessment of the Effects on the Cotswolds National Landscape and its Special Qualities [REP6B-006]** confirms in paragraphs 3.4.35 and 3.4.36 that the Scheme avoids any direct interaction with dry-stone walls or traditional enclosure boundaries within the CNL. The Scheme sits behind retained hedgerows and in-field vegetation which frame the historic pattern in distant views. Therefore, the

defining enclosure patterns and dry-stone walling of the CNL are unaffected by the Scheme.

2.2.17 One section of the CRC (to the southern side of Bridleway WT|GRIT|22) will require the removal of a dry-stone wall. However, this dry-stone wall is not within the CNL. Despite this, **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** states in paragraph 8.10.96 that the dry-stone wall will be rebuilt following construction, thus reinstating a key feature which supports traditional rural skills and contributes to the long-term conservation and management of the surrounding area's distinctive landscape character.

Planting

2.2.18 Given that the vast majority of the Scheme is not located within the CNL, the planting associated with the Scheme would not promote rural skills training or the utilisation of those skills as the purpose of the new planting is to mitigate impacts on the setting of the CNL rather than deliver traditional land-management outcomes. The use of traditional rural skills such as hedge laying are therefore not considered necessary to ensure the long-term retention, creation and management of key features of the CNL. Subsequently, planting will largely be undertaken using mechanical methods which represent the most efficient and practicable means of delivering the scale of new vegetation.

2.2.19 Planting will be undertaken in accordance with the **Outline LEMP [REP6-037]** and **Outline EPMS [REP6-039]**.

2.3 Policy CE5: Tranquillity

2.3.1 Policy CE5 of the CNLMP 2025-2030 states that:

Policy CE5: Tranquillity

CE5.1. Proposals that have the potential to impact on the tranquillity of the Cotswolds National Landscape (CNL) should be delivered in a way that is compatible with and seek to further the conservation and enhancement of this tranquillity, by seeking to avoid and where avoiding is not possible, minimise noise and other aural and visual disturbance.

CE5.2. Measures should be taken to remove and where removal is not possible, minimise existing sources of noise and other aural and visual disturbance in order to enhance the tranquillity of the CNL.

CE5.3. Proposals that have the potential to impact on the tranquillity of the CNL should have regard to – and be compatible with – the CNL Board's Tranquillity Position Statement.

Avoid and minimise noise pollution and other aural and visual disturbance

Noise pollution and aural disturbance

2.3.2 **ES Volume 1, Chapter 14: Noise and Vibration [REP5-024]** confirms that there are no significant noise effects anticipated for any receptors within or directly adjacent to the CNL with proposed mitigation in place during the construction, operation and maintenance, and decommissioning phases. Therefore, noise pollution and aural disturbance has been avoided and minimised.

Visual disturbance

2.3.3 **ES Volume 1, Chapter 3: The Scheme [APP-055]** sets out the lighting strategy for the Scheme in Section 3.4 and Section 3.5. For construction works and at construction compounds temporary site lighting will be used in hours of darkness or where natural lighting is unable to reach (such as sheltered/ confined areas). Where avoiding is not possible, to minimise impacts on human and ecological receptors:

- The use of lighting will be minimised to that required for safe site operations;
- Lighting will utilise directional fittings to minimise outward light spill and glare (e.g. via the use of light hoods/cowls which direct light below the horizontal plane, preferably at an angle greater than 20° from horizontal); and
- Lighting will be directed towards the middle of the Order limits rather than towards the boundaries.

2.3.4 During the operation and maintenance phases, lighting is not required within the Solar PV Sites and all routine maintenance activities would be scheduled for daylight hours as far as practicable. Focussed task specific lighting would only be required in the event of emergency works or equipment failure requiring night-time working. Motion sensing security lighting would be provided within substations and within the BESS Area to maintain safe working conditions in winter months, for security purposes, and for maintenance activities.

2.3.5 Section 20.5 of **ES Volume 1, Chapter 20: Other Environmental Matters [REP5-028]** presents the findings of an assessment of the likely effects on Glint and Glare which are relevant to the Scheme. For CNL viewpoint receptors and Public Rights of Way (PRoW), a low impact is predicted towards five of the 15 viewpoint receptors, where partial screening has been identified in the form of intervening terrain and existing vegetation. These impacts are considered to be not significant.

No impacts are predicted towards the remaining viewpoints. A low impact is predicted towards users of PRoW in the vicinity of the Scheme, however there are no significant safety implications and any negative impact upon amenity will be fleeting for users travelling on PRoW, including equestrian and cyclist users. Therefore, impacts are considered to be not significant, and accordingly no mitigation measures are proposed.

2.3.6 Given the above, it has been demonstrated how visual disturbance on the tranquillity of the CNL has been minimised.

Removing and reducing existing sources of noise pollution and other aural and visual disturbance

2.3.7 The Scheme does not remove or reduce existing sources of noise pollution and other aural and visual disturbance. However, as demonstrated above, impacts relating to noise pollution and other aural and visual disturbance have been minimised, and avoided where possible.

Tranquillity Position Statement

2.3.8 Section 5 of this Annex and **9.2 Tranquillity Technical Note [PDA-010]** sets out how the Scheme aligns with the CNL Board's Tranquillity Position Statement.

2.4 Policy CE6: Dark Skies

2.4.1 Policy CE6 of the CNLMP 2025-2030 states that:

Policy CE6: Dark Skies

CE6.1. Proposals that have the potential to impact on the dark skies of the Cotswolds National Landscape (CNL) should be delivered in a way that is compatible with and seek to further the conservation and enhancement of these dark skies, by seeking to avoid and where avoiding is not possible, minimise lighting.

CE6.2. Measures should be taken to increase the area of dark skies in the CNL by removing and, where removal is not possible or appropriate, reducing existing sources of lighting.

CE6.3. Proposals that have the potential to impact on the dark skies or dark landscapes of the CNL should have regard to and be compatible with:

- *The National Landscapes Board's Dark Skies & Artificial Light Position Statement.*

- *Cotswolds National Landscape Technical Lighting Design Guidance*
- *Best practice standards and guidance, in particular, that published by the Institution of Lighting Professionals.*

CE6.4. Consideration will be given to seeking a formal dark sky designation for those parts of the Cotswolds National Landscape that are least affected by light pollution.

Avoid and minimise lighting

2.4.2 The lighting strategy for the Scheme is set out within Section 3.4 and 3.5 of **ES Volume 1, Chapter 3: The Scheme [APP-055]**. As stated in paragraph 3.5.12 of **ES Volume 1, Chapter 3: The Scheme [APP-055]** lighting is not required within the Solar PV Sites during the operation and maintenance phase of the Scheme.

2.4.3 As noted within Section 2.3.3 and 2.3.4 above, temporary site lighting would be used during construction to enable safe working in hours of darkness or where natural lighting is unable to reach. Appropriate measures would be implemented to prevent or reduce the impact on human and ecological receptors arising from this temporary lighting.

2.4.4 During operation, lighting for the Scheme is located outside of the CNL and would be limited to motion sensory security lighting at substation compounds and the BESS. Further, the Outline Operational Environmental Management Plan (OEMP) **[REP6-031]** states that a sensitive lighting strategy, as part of the detailed OEMP will specify how this artificial lighting will be installed and used, and also serve to mitigate adverse impacts on ecological receptors which are adversely impacted by lighting, such as bats.

2.4.5 Section 3.4 of **ES Volume 3, Appendix 8-6: Assessment of the Effects on the Cotswolds National Landscape and its Special Qualities [REP6B-006]** considers the impact of the Scheme on dark skies. Paragraph 3.4.67 confirms that the Scheme's lighting strategy is dark-sky-compliant and therefore, paragraph 3.4.72 concludes that the dark skies within the CNL would remain intact. In addition, paragraph 3.4.63 states that the lighting strategy, specifically the lack of operational lighting, would ensure that wildlife corridors, particularly bat foraging areas are unaffected by light pollution with the CNL's dark skies contributing to a high-quality night-time environment for wildlife.

2.4.6 The Scheme therefore seeks to conserve dark skies by avoiding and minimising the use of lighting, and ensures that the CNL's dark skies remain intact by introducing no permanent sources of light pollution in proximity to the designation.

Removing and reducing existing sources of lighting

2.4.7 Given that the vast majority of the Scheme is not located within the CNL and the landscape within and surrounding the Scheme comprises predominantly agricultural fields and rural villages and hamlets with limited existing artificial lighting, measures to increase dark skies within the CNL through the removal and reduction of existing sources of lighting is not considered to be relevant.

National Landscape lighting guidance

Dark Skies and Artificial Light Position Statement

2.4.8 Section 6 of this Annex sets out how the Scheme aligns with the CNL Board's Dark Skies and Artificial Light Position Statement.

Cotswolds National Landscape Technical Lighting Design Guidance and best practice standards and guidance

2.4.9 The Outline Operational Environmental Management Plan (OEMP) **[REP6-031]** states that a sensitive lighting strategy, as part of the detailed OEMP will specify how artificial lighting will be installed and used, and also serve to mitigate adverse impacts on ecological receptors which are adversely impacted by lighting, such as bats.

Consideration of formal dark sky designation

2.4.10 As noted above and within Section 3.4 of **ES Volume 3, Appendix 8-6: Assessment of the Effects on the Cotswolds National Landscape and its Special Qualities [REP6B-006]**, the Scheme's lighting strategy is dark-sky compliant and therefore dark skies within the CNL would remain intact.

2.5 Policy CE8: Nature Recovery and Biodiversity

Policy CE8 of the CNLMP 2025-2030 states that:

Policy CE8: Nature Recovery and Biodiversity

CE8.1. Biodiversity (including the abundance of wildlife) in the Cotswolds National Landscape (CNL) should be conserved and enhanced by establishing a coherent and resilient nature recovery network across the CNL and in its setting. This should be achieved in accordance with the outcomes, priorities, targets and measures within the Cotswolds Nature Recovery Plan and Local Nature Recovery Strategies (LNRSs), and focus on the priority species and habitats listed in Appendix 8. The relevant LNRSs are:

- *Gloucestershire*

- *Oxfordshire*
- *Warwickshire*
- *West of England*
- *Wiltshire*
- *Worcestershire*

CE8.2. Policy and strategic documents that are likely to impact on the biodiversity of the CNL should have regard to the CNL Management Plan and guidance including the Cotswolds Nature Recovery Plan and position statements. This includes but is not limited to, the following:

- *Local Plans*
- *Local Nature Recovery Strategies*
- *Neighbourhood Development Plans*
- *Green Infrastructure Strategies*
- *Tree and Woodland Strategies*
- *Ecological Emergency and Climate Change Strategies.*

Nature recovery network

2.5.1 **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** and **ES Volume 3, Appendix 8-6: Assessment of the Effects on the Cotswolds National Landscape and its Special Qualities [REP6B-006]** considers Wiltshire's Nature Recovery Strategy (in draft at the time of submission) and the Cotswold Nature Recovery Plan in determining appropriate mitigation measures to be implemented in the Scheme's design. These measures are summarised in Section 2.2.9 above and seek to conserve and enhance the biodiversity network within and adjacent to the CNL.

2.5.2 Furthermore, **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** has considered the findings of ecological reports, and the author has liaised closely with the ecological consultant to inform the landscape mitigation strategy. This approach has ensured that the landscape mitigation proposed is considered holistically with ecological requirements to maximise the benefits of the Scheme in terms of green infrastructure, habitat creation and ecological mitigation.

2.5.3 In terms of ecological mitigation for the Scheme, decisions have been made to avoid impacts and effects on ecology and biodiversity as far as practicable. Embedded mitigation measures are set out within **Section 9.9 of ES Volume 1, Chapter 9: Ecology and Biodiversity [REP4-010]** and includes:

- Protection – Buffers and offsets have been embedded into the design of the Scheme to protect habitats and important ecological features.
- Access Locations – Access for construction and operational maintenance has been specifically designed to utilise existing field entrances and gaps in hedgerows and other linear habitats wherever possible. Thereby, reducing the need for new gaps in hedgerows or new ditch crossings as far as possible.
- Grid Connection and Cable Installation – The CRC has been sited to avoid or minimise impacts on valuable ecological features. Trenchless techniques (such as horizontal directional drilling) would be adopted for selected 'avoidance areas' (refer to **ES Volume 1, Chapter 3: The Scheme [APP-055]**) within the CRC at particularly sensitive features, such as watercourses, railway corridors and woodland. In less sensitive locations, cables would cross habitats through open cut trenching. Gaps created would be reinstated as soon as possible through hedgerow and grassland replanting/ translocation/ re-seeding.
- Avoidance – No Temporary Construction Compounds would be sited within the Impact Zones for Bat Species.
- Outline CEMP – An **Outline CEMP [REP6-029REP6-029]** has been produced which details measures and approaches to be adopted which will limit the likelihood of effects upon retained habitats through damage, pollution and disturbance during the construction phase.
- Outline EPMS – An **Outline EPMS [REP6-039]** has been produced to provide more detailed ecology-focussed protection and mitigation prescriptions for the construction phase which complements the more general environmental prescriptions of the **Outline CEMP [REP6-029]**.
- Outline OEMP – An **Outline OEMP [REP6-031]** has been produced to identify how commitments made in the ES will be translated into actions during operation and includes a process for implementing the actions through allocation of key roles and responsibilities.
- Outline Decommissioning Strategy – An **Outline Decommissioning Strategy [REP6-033]** has been produced to demonstrate how the mitigation measures relevant to decommissioning activities included ES will be implemented. It also sets out the monitoring and auditing activities designed to ensure that such mitigation measures are carried out and effective.

2.5.4 The Scheme has been designed to integrate with, and where practicable enhance the landscape and local green infrastructure network to improve biodiversity and ecological connectivity across the Solar PV Sites. The proposed landscaping design is set out in **ES, Volume 2 Figure 3-4**

Landscape and Ecology Mitigation Plan [REP6B-009]. This has been developed with regard to feedback from the CNL Board and Wiltshire Council, including measures to protect and enhance the setting of the CNL.

2.5.5 **Biodiversity Net Gain Assessment Report [REP6-024 and as updated for Deadline 7]** calculates the proportion of new planting to be provided, this comprises:

- 11.04 ha of new native broadleaved woodland;
- 9.43 km of new lines of trees;
- 15.90 km of new native hedgerows;
- 619 ha of new improved grassland; and
- 4.43 ha of mixed scrub planting.

This is shown on the indicative layout of the Solar PV Sites (refer to **ES Volume 2, Figure 3-1: Indicative Site Layout Plan [REP3-035]**).

2.5.6 In addition, the Scheme's design incorporates species mitigation and enhancement features as set out in the **Outline LEMP [REP6-037]**:

- Ground Nesting Bird Habitat – Permanent set-aside habitat (54 ha) to provide foraging and nesting habitat for ground-nesting bird species on fields B1, B12, C1 and C6. Diverse wildflower meadow (72.2 ha) also of benefit to ground-nesting bird species on fields A11, A12, C10, C24 and C28.
- Habitat Boxes and Wildlife Enhancement Measures – Bird and bat boxes, log piles, hibernacula and bee banks.

2.5.7 Given the above, it is evident that the Scheme has considered the Wiltshire's Nature Recovery Strategy and the Cotswold Nature Recovery Plan, using these documents to inform appropriate mitigation measures for the Scheme which protects the landscape and the diverse ecology present across the CNL.

Cotswolds National Landscape policy and strategic documents

2.5.8 This Annex does not consider Policy CE13.2 as it relates to the preparation of policy and strategic documents by local authorities and other bodies, requiring them to consider the CNLMP and other Board guidance.

2.6 Policy CE13: Development and infrastructure – principles

2.6.1 Policy CE13 of the CNLMP 2025-2030 states that:

Policy CE13: Development and infrastructure – principles

CE13.1. Development and infrastructure proposals in the Cotswolds National Landscape (CNL) and its setting should be delivered in a way that is compatible with and seeks to further the conservation and enhancement of the natural beauty of the CNL including its special qualities. In doing so, they should have regard to – and be compatible with the CNL Management Plan and guidance produced by the CNL Board, including the:

- *CNL – Landscape Strategy and Guidelines*
- *CNL – Landscape Character Assessment*
- *Cotswolds Nature Recovery Plan*
- *CNL – Local Distinctiveness and Landscape Change*
- *CNL Board Position Statements*
- *CNL Pathway to Net-Zero*
- *CNL Climate Change Strategy*

CE13.2. Development and infrastructure proposals in the CNL should be delivered in a way that is compatible with and seeks to further the purpose of increasing the understanding and enjoyment of the CNL's special qualities. They should also contribute to the economic and social wellbeing of CNL communities, in a way that is compatible with conserving and enhancing the natural beauty of the CNL.

CE13.3. Development and infrastructure proposals in the CNL and its setting should comply with relevant national planning policy and guidance, particularly with regards to those paragraphs of the National Planning Policy Framework (NPPF) that relate to national landscapes.

CE13.4. The purposes of conserving and enhancing the natural beauty of the CNL and increasing the understanding and enjoyment of the CNL special qualities should be identified as strategic priorities in Local Plans, Neighbourhood Plans, Local Transport Plans and other relevant plans and strategies. These plans and strategies should explicitly identify the CNL Management Plan as a material consideration when considering development and infrastructure proposals.

CE13.5. The cumulative impacts of development proposals on the natural beauty of the CNL should be fully assessed.

CE13.6. A landscape-led approach should be applied to the planning, design and implementation of development and infrastructure proposals in the CNL and its setting, proportionate to the type and scale of development being proposed, whereby proposals:

- *Address the natural beauty of the CNL as primary consideration at all stages of the development process, from initial conception through to implementation*
- *Address all of the factors that contribute to the natural beauty of the area*
- *Address access to natural beauty including the character of the public rights of way network and its role within wider green infrastructure*
- *Reflect and enhance the character of the local area*
- *Avoid adverse effects where possible and, if adverse effects can't be avoided, minimise them*
- *Seek opportunities to enhance the natural beauty of the CNL*
- *Deliver more beneficial effects than adverse effects for the natural beauty of the CNL.*

This landscape-led approach is particularly important for major development.

Have regard to and be compatible with Cotswolds National Landscape Board Plans and Guidance

Cotswolds National Landscape – Landscape Strategy and Guidelines

2.6.2 Section 8.8 of **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** makes reference to the Cotswolds AONB Landscape Strategy and Guidelines for the scoped in Landscape Character Areas (LCT11 Dip slope Lowland and LCT14 Cornbrash Pastoral Lowlands). The full descriptions of LCT11 and LCT14 are provided in **ES Volume 3, Appendix 8-4 Landscape Character Area Descriptions [APP-195]**.

Cotswolds National Landscape – Landscape Character Assessment

2.6.3 Table 8-7 of **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** provides a summary of the landscape character assessments within the 5 km study area, including those that have been scoped into the assessment of the Scheme. At a local level, LCT11, LCA11A, LCT14 and

LCA14A as identified in the Cotswolds National Landscape Character Assessment, are scoped into the assessment.

2.6.4 Landscape character areas within the Cotswolds AONB Landscape Character Assessment are described in Paragraphs 8.8.88 to 8.8.111 of **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]**. In addition, the Landscape Character Assessment of the Cotswolds AONB is shown on **ES Volume 2, Figure 8-5: Landscape Character Areas [APP-094]**.

2.6.5 Given the above, the assessment of the likely significant landscape and visual effects as a result of the Scheme set out in **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** has had regard to the Cotswolds AONB Landscape Character Assessment.

Cotswolds Nature Recovery Plan

2.6.6 **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** and **ES Volume 3, Appendix 8-6: Assessment of the Effects on the Cotswolds National Landscape and its Special Qualities [REP6B-006]** makes reference to the Cotswolds Nature Recovery Plan with the approach to mitigation (refer to Section 2.2.9 of this Annex for a summary of embedded mitigation measures) being informed by the Plan.

Cotswolds National Landscape – Local Distinctiveness and Landscape Change

2.6.7 Section 8.8 of **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** makes reference to the CNL Local Distinctiveness and Landscape Change Report for the scoped in Landscape Character Areas (LCT11 Dip slope Lowland and LCT14 Cornbrash Pastoral Lowlands). The full descriptions of LCT11 and LCT14 are provided in **ES Volume 3, Appendix 8-4 Landscape Character Area Descriptions [APP-195]**. Therefore, the assessment of the likely significant landscape and visual effects as a result of the Scheme set out in **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** has had regard to the CNL Local Distinctiveness and Landscape Change Report.

Cotswolds National Landscape Board Position Statements

2.6.8 This Annex considers how the Scheme is in accordance with recommendations set out within the following CNL Board Position Statements:

- Renewable Energy Position Statement (June 2023) – Section 3;
- Development in the setting of the Cotswolds AONB Position Statement (June 2016) – Section 4;

- Tranquillity Position Statement (June 2019) – Section 5;
- Cotswolds Dark Skies & Artificial Light Position Statement (March 2019) – Section 6; and
- Tree Species and Provenance Position Statement (July 2023) – Section 7.

2.6.9 **ES Volume 3, Appendix 8-6: Assessment of the Effects on the Cotswolds National Landscape and its Special Qualities [REP6B-006]** makes references to the CNL Board Position Statements in Section 1.3 and Table 14. The Position Statements are also referred to within the assessment of the effects of the Scheme on the CNL's Special Qualities in Section 3.4 and the assessment conclusion in Section 3.6. This includes the following CNL Board Position Statements: :

- Landscape-Led Development (April 2021);
- Development in the setting of the Cotswolds AONB (June 2016);
- Tranquillity Position Statement (June 2019); and
- Cotswolds Dark Skies & Artificial Light Position Statement (March 2019).

2.6.10 In addition, **9.2 Tranquillity Technical Note [PDA-010]** sets out how the Scheme aligns with the CNL Board's Tranquillity Position Statement.

Cotswolds National Landscape Pathway to Net-Zero

2.6.11 The CNL Board aim to work towards a net zero CNL. Section 7.10 of **ES Volume 1, Chapter 7: Climate Change [REP5-022]** sets out that the Scheme could provide around 442,300MWh/year if tracker panels are used and 560,000MWh/year if fixed panels are implemented. This represents a significant contribution towards delivery of the government's energy objectives and target of net zero by 2050. The total energy generated by the Scheme would be around 25.07TWh and 31.75TWh over the 60-year Scheme lifespan for tracked and fixed panels respectively.

2.6.12 In addition, the **Statement of Need [REP1-085]** sets out that the Scheme is a leading large-scale solar plus storage scheme. If consented, it would be an essential component of the UK's plan to deliver a future of efficient decarbonisation through the deployment of large-scale, technologically and geographically diverse low carbon generation schemes and would also deliver flexibility to the UK electricity market, contributing to lowering bills for consumers through its operational life. The meaningful and timely contributions offered by the Scheme to UK decarbonisation and security of supply, will be critical on the path to net zero beyond delivery of the

government's 'Clean Power by 2030' mission. Without the Scheme, a significant and vital opportunity to develop a large-scale low carbon generation scheme will have been passed over, increasing materially the risk that future Carbon Budgets and the net zero 2050 target will not be achieved.

Cotswolds National Landscape Climate Change Strategy

2.6.13 The Cotswolds National Landscape Climate Change Strategy seeks to take a landscape approach to identify actions to respond to climate change and make the Cotswolds more resilient and make a positive contribution to the statutory purpose of the AONB mitigation. The Strategy sets out actions to tackle climate change for both mitigation and adaptation.

2.6.14 Section 7.9 of **ES Volume 1, Chapter 7: Climate Change [REP5-022]** states that the Scheme has been designed, as far as practicable, to avoid and reduce impacts and effects of Climate Change and to increase Climate Change resilience through the process of embedding measures into the design. In addition, how the Scheme is constructed, operated and maintained, and decommissioned would be controlled through measures secured in the DCO in order to manage and minimise potential environment effects. Table 1 of **Outline CEMP [REP6-029]** and Table 1 of the **Outline OEMP [REP6-031]** includes measures which form the Greenhouse Gas (GHG) Reduction Strategy for the Scheme.

2.6.15 Furthermore, Section 7.9 of **ES Volume 1, Chapter 7: Climate Change [REP5-022]** sets out mitigation measures to be embedded into the design of the Scheme. This includes (but is not limited to):

- Associated electrical infrastructure, including substations and conversion units, will be sequentially located to areas with a 'low' probability of flooding where practicable;
- Less-flood sensitive infrastructure forming the wider Scheme (Solar PV Panels and cabling) will be sequentially located outside the 1 in 100 plus climate change annual probability extent (1% +CC) or where this is not practicable restricted to areas which would experience less than 1m depth of flooding during the same event;
- For both fixed and tracker panels, all sensitive and electrical equipment on the Solar PV Panel will be elevated by the legs (including the solar panel face itself) so that it is no less than 0.6 metres above the surrounding peak flood level; and
- Tracker panel units will be mounted on raised frames (raised a minimum of 0.4 metres when on maximum rotation angle) and will therefore be raised above surrounding ground levels and fitted with a

tracking system. During times of flooding, solar panels may be stowed by the tracking system algorithm onto a horizontal plane, to the minimum post height of 2.5 metres above ground level. This ensures that all sensitive and electrical equipment on the solar panel is raised to a minimum of 2.5 metres above ground level in the horizontal position.

2.6.16 As noted within paragraphs 2.6.11 and 2.6.12 of this Annex, the Scheme would provide a significant amount of low carbon energy. Therefore, the Scheme aligns with the CNL Climate Change Strategy by contributing towards the achievement of net-zero targets.

2.6.17 Through the implementation of measures to be secured in the DCO and mitigation measures in relation to climate change, the Scheme would indirectly protect the environmental quality and ecological integrity of the CNL.

Enhancing understanding and enjoyment of the Cotswolds National Landscape

2.6.18 **ES Volume 3, Appendix 8-6: Assessment of the Effects on the Cotswolds National Landscape and its Special Qualities [REP6B-006]** explains in paragraph 2.2.9 that consultation with relevant consultees and planning authorities played a key role in gathering specific information about the Sites, the Cable Route Corridor and the associated views. Public consultation was also valuable to seek an understanding and agreement regarding views and to highlight the local interests and values that may have otherwise been overlooked. One of the objectives of consultation was to clearly identify those matters of visibility which are important to stakeholders to inform the LVIA process.

2.6.19 The effects of the Scheme on the CNL's Special Qualities are assessed within Section 3 of **ES Volume 3, Appendix 8-6: Assessment of the Effects on the Cotswolds National Landscape and its Special Qualities [REP6B-006].** This assessment includes consideration of the CNL's purpose to conserve and enhance the natural beauty of the CNL, and to increase understanding and enjoyment of the Special Qualities of the CNL. No direct significant effects on the Special Qualities of the CNL were found. Positive outcomes of the Scheme were identified which would further the purpose of the CNL, this includes biodiversity and nature recovery (Special Quality 6) and an accessible landscape (Special Quality 12) as a result of the delivery of 12.8km of permissive paths within the setting of the CNL.

Compliance with national policy and guidance

2.6.20 **Annex A: National Policy Accordance Tables** of the **Planning Statement [REP3-081 and as updated for Deadline 7]** sets out how the Scheme complies with relevant national planning policy and guidance, including the relevant paragraphs of the National Planning Policy Framework (NPPF) which relates to landscape. This includes an analysis of how the Scheme complies with the exceptional circumstances test set out in NPS EN-1 paragraph 5.10.32 for projects located within national landscapes.

CNL special qualities as strategic priorities

2.6.21 This Annex does not consider Policy CE13.4 as it falls within the remit of local plans and strategies such as Local Plans, Neighbourhood Plans and Local Transport Plans. Nonetheless, the impact of the Scheme on the special quality of the CNL has been assessed and the conclusions set out in **ES Volume 3, Appendix 8-6: Assessment of the Effects on the Cotswolds National Landscape and its Special Qualities [REP6B-006].**

Cumulative impacts on the natural beauty of the Cotswold National Landscape

2.6.22 Cumulative effects of the Scheme on the landscape have been assessed within Section 8.13 of **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]**. Significant effects are recorded within 1km Local Study Area during construction and Year 1 of the Scheme, with these effects deriving solely from the Scheme. As discussed at Paragraph 2.2.6, this change does not directly affect the CNL or its setting as the buffer to the development provided by the avoidance measures restricts the development away from the land within the setting of the CNL. As such there are no Significant Adverse effects to landscape character for land either within the CNL or within its setting. No significant effects are recorded within the 2km Wider Study Area, 5km Outer Study Area or 10km Cumulative Study Area.

2.6.23 Despite the intensification of renewable schemes across the area, the receiving landscape has the ability to accommodate the Scheme and the Cumulative Development Sites without resulting in any overall increase in the Significance of Effects.

Landscape led approach

Consideration of landscape during design evolution

2.6.24 The **Design Approach Document [APP-268]** demonstrates that the Applicant has adopted a 'landscape led' approach to design, giving due weight to the intrinsic character and beauty of the surrounding countryside. It sets out how the Scheme has evolved up until the point of the DCO Application including the implementation of design changes to reduce adverse effects onto the landscape such as the removal of the BESS Area from Melksham, the Avoidance of Solar PV Panels in field parcels with views to the CNL and from land with high visibility, sensitive siting of Solar PV Panels within field boundaries, reinforcement and provision of planting, buffers and enhancements to PRoW and removal of fields from the Order Limits due to landscape and visibility matters.

Access to natural beauty, including Public Rights of Way

2.6.25 In terms of access to PRoWs, paragraph 4.2.4 of the **Design Approach Document [APP-268]** states that the Scheme includes the creation of new non-vehicular permissive paths on each of the Solar PV Sites for the lifetime of the Scheme. This would provide pedestrians and riders improved accessibility to the countryside and improved connectivity to the wider PRoW network. The permissive paths will mitigate adverse impacts on other PRoWs and provide alternative access routes to the use of the local highway network. This will enhance connectivity in the local area, including in the setting of the CNL and may help to improve recreation in the immediate vicinity.

Conserving and enhancing the Cotswolds National Landscape

2.6.26 **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** and **ES Volume 3, Appendix 8-6: Assessment of the Effects on the Cotswolds National Landscape and its Special Qualities [REP6B-006]** sets out how landscape and visual impacts have been minimised as far as practicable. Through the implementation of good design principles, including the application of a mitigation hierarchy, the Scheme would conserve and enhance the natural beauty of the CNL. Section 2.2.9 of this Annex summarises the mitigation measures which would be embedded into the design of the Scheme. These mitigation measures have been informed by the Cotswold Nature Recovery Plan in conjunction with liaison with the project Ecologist and consultation with officers at CNL and Wiltshire Council. The proposed landscaping design is set out in **ES, Volume 2 Figure 3-4 Landscape and Ecology Mitigation Plan [REP6B-009]**.

2.6.27 In addition, the effects of the Scheme on the Special Qualities of the CNL are assessed in detail within **ES Volume 3, Appendix 8-6: Assessment of the Effects on the Cotswolds National Landscape and its Special Qualities [REP6B-006]**. Section 3.6 concludes that the Scheme has avoided harm to the CNL, maintained views to and from the CNL, protected the features of the landscape within the setting of the CNL, retained and enhanced the character of the landscape through the proposed embedded mitigation and provided positive enhancements to further the purpose of the CNL. No significant direct effects on the CNL or its Special Qualities have been found as a result of the Scheme. Harm to the CNL itself would be minimal with beneficial landscape effects within the setting of the CNL in the long term which would further the purposes of the designation.

2.7 Summary

2.7.1 Overall, the above demonstrates that the Scheme is in accordance with the CNLMP with its design seeking to conserve and enhance the natural beauty of the CNL and its Special Qualities.

3 Renewable Energy Position Statement

3.1.1 The CNL Board Position Statement on Renewable Energy (June 2023) considers six types of renewable energy, including heat pumps, biomass, hydropower, solar energy, wind energy and battery storage in the context of the CNL.

3.1.2 Section 3.4.4 of the Renewable Energy Position Statement focuses on large scale solar energy which is of particular relevance to the Scheme. The Position Statement outlines key considerations when assessing solar energy schemes, these include:

- Landscape sensitivity – landscape sensitivity is a measure of the resilience or robustness of a landscape to withstand specified change arising from development types, without undue negative effects on the landscape and visual baseline.
- Landscape and visual impact assessments – to help identify the significance of landscape and visual impacts on a case-by-case basis.
- National policy – solar energy schemes within the CNL that would constitute major development (in the context of paragraph 177 of the NPPF) can only be permitted in exceptional circumstances where it can be demonstrated that the development would be in the public interest, in line with national policy.
- Site selection – consideration of brownfield or less sensitive sites over open countryside, particularly former quarry sites.
- Cumulative effects – consideration of the impacts of additional infrastructure required, such as road access, on-site tracks, hard standings, construction compounds, electrical cabling, security fencing and lighting sub-stations, battery storage and/ or control buildings. Consideration should also be given to potential conflicts with other land uses such as food production, nature recovery and woodland creation.

3.1.3 The following sections set out how the Scheme has taken the above considerations into account and therefore how it aligns with the Renewable Energy Position Statement.

3.2 Landscape sensitivity

3.2.1 Paragraphs 8.3.49 to 8.3.60 **of ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** assesses the Scheme against the Wiltshire Council Renewable Energy Study Landscape Sensitivity Assessment. The assessment uses the spatial framework of Landscape Character Types (LCTs) and component LCAs identified by the existing Wiltshire LCA (2005). The Scheme is wholly within LCT16 and LCA 16 A with LCT 16

continually scoring as one of the least sensitive areas to solar energy developments. Therefore, the Site is appropriately located within an area of low sensitivity.

3.3 Landscape and visual impact assessment

3.3.1 A Landscape and Visual Impact Assessment (LVIA) has been undertaken for the Scheme and included within **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004].**

Landscape assessment

3.3.2 In terms of the landscape effects of the Solar PV Sites, Section 8.10 of **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** confirms that there would be no significant effects upon the landscape fabric during construction and Year 1 as embedded mitigation measures have been included within the design of the Scheme to protect the landscape fabric of the existing landscape features within the Scheme. Once mitigation measures are established, significant beneficial effects would occur during Operation from Year 15 and at decommissioning through enhancement to the landscape fabric.

3.3.3 During construction and in Year 1 Operation there would be significant adverse effects in the 1km study area. These effects are primarily related to the change in land use from agriculture to the Scheme and this change does not directly affect the CNL or its setting as the buffer to the development provided by the avoidance measures restricts the development away from the land within the setting of the CNL. As such there are no Significant Adverse effects to landscape character for land either within the CNL or within its setting. At Year 15 and decommissioning, the effect reduces to not significant. With regard to the Cable Route Corridor, no significant landscape effects would occur within the Cable Route Corridor Study Area with all effects being short term and temporary in nature with cables placed underground.

3.3.4 In relation to post decommissioning and the legacy landscape, the site would benefit from the significantly enhanced tree and hedgerow planting that has been carried out and has matured to create a much stronger and robust landscape, retaining, and enhancing the overall character and providing considerable biodiversity benefits over the years. As a result the landscape would be left in a better condition than the current day.

Visual assessment

3.3.5 Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** sets out an extensive range of mitigation and enhancement measures proposed as part of the Scheme to reduce the landscape and

visual effects of the Scheme as far as practicable. Following the implementation of mitigation measures. It can be concluded (refer to **ES Volume 3, Appendix 8-3-3 Summary of Visual Effects [REP6-022])** that significant visual effects would be experienced by 9 private receptors during construction and at Year 1 Operation. These significant effects would fall away in Operation Year 15 and at decommissioning once landscaping has become established. For public receptors during each phase of the Scheme, during construction and at Operation Year 1, 27 public receptors would experience significant visual effects. As planting matures, at Operation – Year 15 and at decommissioning, significant effects would be reduced to 10 affected public receptors. For transport receptors, during construction significant visual effects would occur to nine transport receptors, reducing to eight receptors during Year 1 of operation and no significant visual effects occurring during operation at Year 15 or during decommissioning. In terms of visual effects in the CRC, 6 significant effects would occur to private receptors during construction and to 7 public receptors. These receptors are located close to the CRC and would experience a change in views and visual amenity. No significant visual effects within the Cable Route Corridor Study Area would occur during operation (Year 1 or Year 15) or decommissioning.

3.3.6 It should be noted that where significant long-term effects on public receptors remain at Year 15, this is primarily because mitigation is not proposed as it would not be appropriate to the long-term landscape character and the legacy landscape. For example, where footpaths diagonally cross fields, new hedgerows to screen views of infrastructure would not be consistent with the regular pattern of fields which is characteristic of the existing landscape. Other instances of significant long-term visual effects on Public Receptors relate to the local topography where there are views from higher ground to infrastructure which cannot be fully alleviated by mitigation.

Cotswold National Landscape

3.3.7 In terms of the setting of the CNL, paragraph 8.10.122 of **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** sets out that the avoidance measures adopted (avoiding development adjacent to the National Landscape where it would affect its setting and avoiding development where it would be visually intrusive and affect the character and visual experience of the landscape) prevent harm to the CNL and also provide opportunities for positive enhancement within the setting of the CNL. These measures contribute to the substantial increase in vegetation across the Scheme.

3.3.8 Paragraph 8.10.123 of **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** notes that the significant adverse effects within the 1km

local study area stated above are primarily related to the change in land use from agriculture to the solar farm and that this change does not directly affect the CNL as the buffer to the development provided by the avoidance measures and layers of proposed mitigation planting contains the development away from the edge of the CNL. As such, the development would be barely discernible from within the CNL. Harm to the CNL itself would be minimal, (lasting as long as it takes for the planting to become appropriately established) with beneficial landscape effects within the setting of the CNL having effect in the long term, including as a legacy following decommissioning of the Scheme, which would further the purposes of the designation.

3.3.9 Furthermore, **ES Volume 3, Appendix 8-6: Assessment of the Effects on the Cotswolds National Landscape and its Special Qualities [REP6B-006]** provides a standalone assessment of the effects of the Scheme on the CNL and its Special Qualities. It concludes that there are no significant direct effects on the CNL or its Special Qualities as a result of the Scheme.

3.4 Compliance with national policy

3.4.1 Paragraph 177 of the 2021 NPPF[1] has a presumption against major development proposals within Areas of Outstanding Natural Beauty with development only acceptable in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Whilst the NPPF is considered important and relevant to decision making for the Scheme, the Secretary of State will decide the application on the basis of the relevant NPSs. NPS EN-1 paragraph 5.10.32 provides a similar exceptional circumstances test.

3.4.2 The vast majority of the Scheme is not located within the CNL, however, four Highway Improvement Areas (2.16 ha) are located within the CNL where works are required to existing roads and junctions to make them suitable for construction traffic. This represents 0.17% of the total Scheme. The Applicant has demonstrated the Scheme's compliance with the exceptional circumstances test as set out part 8.3 (subsection Landscape and Visual Impact) of the **Planning Statement [REP3-081 and as updated for Deadline 7**].

3.4.3 Given that the Scheme adjoins the CNL, impacts to the setting of the CNL must also be considered. Paragraph 8.10.134 of **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** and Section 2.3 of **ES Volume 3,**

[1] The Board's Renewable Energy Position Statement refers to the 2021 NPPF which has been superseded. The August 2026 NPPF is the most up to date version and does not contain the same policy test. Nevertheless, NPS EN-1 contains the same policy test and applies to the Scheme..

Appendix 8-6: Assessment of the Effects on the Cotswolds National Landscape and its Special Qualities [REP6B-006] sets out mitigation measures (refer to Section 2.2.9 of this Annex for details) which will be embedded into the design of the Scheme to conserve and enhance the natural beauty of the CNL. Furthermore, Section 3.6 concludes that there are no significant direct effects on the CNL or its Special Qualities. Harm to the CNL itself has been considered to be minimal with beneficial landscape effects being implemented within the setting of the CNL in the long term which would further the purposes of the designation.

3.5 Site selection

3.5.1 **ES Volume 3, Appendix 4-1 Site Selection Assessment Report [APP-185]** sets out the methodology that has been applied when identifying and evaluating potential sites for the Scheme. It identifies a number of potential development areas for the Scheme and presents how each of those areas perform against a range of planning, environmental and operational constraints and opportunities. This included consideration of constraints such as nationally designated landscapes, designated international and national ecological and geological sites, agricultural land and previously developed land. It was concluded that there are no more suitable and available locations within a 20km radius from the point of connection than the proposed location for the Scheme.

3.5.2 A quarry site was considered within **ES Volume 1, Chapter 4: Alternatives and Design Evolution [APP-056]**, this being the disused chalk quarry at Westbury. Paragraph 4.3.16 states that given the site is within the Salisbury Plain Special Protection Area mitigation zone and the Special Landscape Area for the Salisbury Plain, and the current topography of the site (with steep walls that would likely affect irradiance levels), it is unsuitable for solar development in its current state. Significant remediation would be required to make the site usable for solar. Therefore, given the current disused status of the quarry, and timescales for restoration not aligning with the grid connection date, the site is not a realistically available site for the Scheme.

3.6 Cumulative effects

3.6.1 The assessment of likely cumulative effects from the Scheme is reported within **ES Volume 1, Chapters 7 to 20 [EN010168/APP/6.1]** and summarised in **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-073]** which identifies that taking a conservative worse case approach, significant cumulative effects with the short list of developments are identified at a limited and discrete number of receptors comprising tourism and recreation impacts during the construction phase for example, on Corsham Park, PRoW

WT|CORM|122, WT|HULL|29, and Sustrans Cycle Route 403, and on skylark at a District level. However, it must be noted that these significant cumulative effects have only been identified during the construction phase and do not continue into the operation of the Scheme. Accordingly, significant cumulative effects are limited to the short-term. Furthermore, inter project communication will take place to minimise tourism and recreation impacts whilst the impact to skylark is likely to reduce to not significant as and when skylark mitigation is proposed for 18/08271/OUT in any discharge of condition application.

3.7 Summary

3.7.1 Overall, the above demonstrates how the Scheme does not significantly affect the natural beauty of the CNL and therefore aligns with the Renewable Energy Position Statement.

4 Development in the setting of the Cotswolds AONB Position Statement

4.1.1 The CNL Board Position Statement on Development in the setting of the Cotswolds AONB (2016) provides guidance on the consideration of the impact of development proposals which lie outside the CNL (formerly AONB) but within its 'setting.'

4.1.2 The Board considers the setting of the CNL to be "*the area within which development and land management proposals, by virtue of their nature, size, scale, siting materials or design can be considered to have an impact, positive or negative, on the landscape, scenic beauty and special qualities of the Cotswolds AONB.*"

4.1.3 Section 2 and 3 of the Position Statement highlights that there are differing ways of assessing impacts on the setting of the AONB, these include:

- *Harm directly to land in the designated AONB itself from views out of the AONB and between parts of the AONB towards new development in its setting (where paragraph 115[2] of the NPPF is relevant); and*
- *As a separate material consideration, harm to land outside the designated AONB, for example views of new development in the context or backdrop of the AONB (where paragraphs 115 or 116[3] is not relevant).*

4.1.4 The following sections set out how the design of the Scheme seeks to conserve and enhance land within the CNL and its setting.

4.2 Harm directly to land within the Cotswolds National Landscape

4.2.1 **ES Volume 3, Appendix 8-6: Assessment of the Effects on the Cotswolds National Landscape and its Special Qualities [REP6B-006]** provides a standalone assessment of the effects of the Scheme on the CNL. The landscape and visual effects of the Scheme on the CNL and its Special Qualities have been mitigated throughout the landscape led, iterative design process that has been undertaken which has been informed by the Cotswold Nature Recovery Plan and in consultation with

[2] The Board's Development in the setting of the Cotswolds AONB Position Statement refers to the 2021 NPPF which has been superseded. The August 2026 NPPF is the most up to date version and does not contain this policy, but the policies on National Landscapes in NPS EN-1 still apply.
[3] Paragraph 116 of the 2021 NPPF has been superseded. The August 2026 NPPF is the most up to date version and does not contain this policy, but the policies on National Landscapes in NPS EN-1 still apply.

officers at the CNL and Wiltshire Council. Embedded mitigation measures relating to the CNL are summarised in Section 2.2.9 of this Annex. The assessment also concludes that the Scheme will have no significant direct effects on the CNL or its Special Qualities and the proposed mitigation measures are sufficient, appropriate and proportionate to the scale of the Scheme.

4.3 Harm to land outside the Cotswolds National Landscape

4.3.1 The **Design Approach Document [APP-268]** outlines how the Applicant has adopted a 'landscape led' approach to design, giving weight to the intrinsic character and beauty of the surrounding countryside. It also demonstrates how the Scheme has undergone an iterative design process to deliver a Scheme design which will deliver large amounts of renewable and low carbon energy while being sensitive to the local context and surroundings, and minimising impacts on the environment as far as practicable.

4.3.2 The design of the Scheme was refined following feedback from statutory consultation, ongoing discussions with key stakeholders including (but not limited to) officers from the CNL Board and Wiltshire Council regarding the CNL and protection of its setting. These changes are set out in Section 4.1 of the **Design Approach Document [APP-268]** and include the reduction of the Scheme area and removal of Solar PV Panels within field parcels to reduce landscape and visual impacts. The design changes are summarised as follows:

- Removal of Solar PV Panels in Lime Down A (fields A11 and A12) in order to protect the CNL and its setting. These fields will be planted instead.
- Refinement of the Order Limits in Lime Down B including the removal of Solar PV Panels from field numbers B2, B3 and B4, as well as the removal of part of these fields from the Order Limits along with field B5, thus resulting in the reduction of the Order Limits. These changes were the result of further consideration of views to the nearby Fosse Way footpath. As a result of these changes, the construction compound was moved to field B1.
- Removal of field numbers C2, C3 and C4 (Lime Down C) from the Order Limits to protect the CNL and its setting. These changes were made following feedback form the CNL Board regarding the relationship between the fields and the setting of the CNL, in particular the higher topography of the fields from a nearby footpath and the clear view over the fields into the CNL towards St Gile's Church in

Alderton and to ensure accordance with the Scheme's Design Principles.

- Removal of Solar PV Panels in Lime Down C (field C6) to protect the CNL and its setting, together with heritage considerations. The field was not removed from the Order Limits to allow areas for mitigation and enhancement close to the CNL, providing an opportunity to seek to further the purposes of the CNL in line with national policy and the Board's aspirations.
- Following consultation with the Cotswolds National Landscape Board during examination, panels have also now been removed from the entirety of field A1 and C9.

4.3.3 Furthermore, **Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** sets out how the iterative design process has minimised landscape and visual effects. The LVIA is summarised in Section 3.3 of this Annex and confirms that though the implementation of mitigation and enhancement measures, landscape and visual effects would be reduced as far as practicable and over time once landscape has been established, there would be significant benefits associated with the Scheme.

4.3.4 The following mitigation measures would be embedded into the Scheme design and are similar to those relating to the CNL in Section 2.2.9 of this Annex:

- Avoidance – Avoiding development adjacent to the CNL where it would affect its setting and avoiding development where it would be visually intrusive and affect the character and visual experience of the landscape;
- Protection – Buffers and offsets have been embedded into the design of the Scheme to protect the landscape fabric of the Sites.
- Retention and Enhancement – Retention and enhancement of the existing landscape framework to gap up existing hedgerows and provide new tree lines to increase age and species diversity. The embedded mitigation also includes new planting to both mitigate the visual effects of the Scheme and provide landscape benefits. This includes new planting within riparian corridors to enhance existing water corridors, new planting to provide softening and screening to any potential light spill, reinforcement of existing hedgerows, and new areas of native woodland, trees, scrub and grassland for habitat connectivity, screening and to enhance the landscape character.
- Positive Enhancements – Positive enhancements to maintain and enhance the landscape character on the edge of the CNL. This includes:

- The inclusion of wildflower meadow verges on the edge of set aside land in A11, A12 and C10 to provide attractive buffers in views from public roads; and
- Maintaining all hedgerows at their current height of c1.5m (or as existing if greater) bordering the CNL within Site C (including the northern boundary of C1(hedgerow SH3) to maintain open views of the landscape within the setting of the CNL.

4.3.5 The Scheme has been refined through an iterative design process with changes implemented to the Scheme design in response to feedback regarding the CNL and its setting during statutory consultation from stakeholders such as the CNL Board and Wiltshire Council. The Scheme has therefore sought to minimise landscape and visual impacts within the wider setting of the CNL as far as practicable and proposes an extensive range of mitigation measures to ensure that the surrounding landscape continues to provide an appropriate back drop to the CNL. The proposed landscaping design is set out in **ES, Volume 2 Figure 3-4 Landscape and Ecology Mitigation Plan [REP6B-009]**.

4.4 Summary

4.4.1 Whilst the Scheme results in some localised visual change within the surrounding landscape, there would be no significant harm to the CNL with the Scheme adopting a landscape-led approach which seeks to minimise impacts on the existing landscape as far as practicable. The Scheme is therefore in accordance with the Development in the setting of the Cotswolds AONB Position Statement.

5 Tranquillity Position Statement

5.1.1 The CNL Board Position Statement on Tranquillity (June 2019) sets out the context for consideration of tranquillity by stakeholders, relevant authorities, local authorities and government. 'Relevant stakeholders' are defined as *"those organisations, businesses, communities and individuals who are involved in proposing, developing, assessing, making decisions on, implementing and or reviewing activities and proposals that affect – or have the potential to impact – the tranquillity of the Cotswolds AONB."* Therefore, for the purposes of the Tranquillity Position Statement, the Applicant for the Scheme is a relevant stakeholder.

5.1.2 Section 4.4 of the Position Statement refers to landscape and visual impacts, setting out the following recommendations:

- *Proposals that are likely to impact on the tranquillity of the Cotswolds AONB should have regard to – and be compatible with – the Cotswolds AONB Landscape Character Assessment and the Cotswolds AONB Landscape Strategy and Guidelines;*
- *Where a Landscape and Visual Impact Assessment identifies adverse landscape and visual impacts, it should be acknowledged that the tranquillity of the AONB will also be adversely affected.*

5.1.3 Furthermore, Section 5.2 sets out recommendations for heliographic effects (reflection of sunlight off surfaces). This includes the following recommendation:

- *Measures should be taken to avoid or minimise the reflection of sunlight off surfaces such as solar panels, agricultural buildings or industrial buildings, for example, by using a less reflective surface and by positioning relevant developments in a less intrusive position and / or location.*

5.1.4 The following sections set out how the design of the Scheme has taken tranquillity into account and therefore aligns with the above recommendations for relevant stakeholders.

5.2 Landscape and visual impacts

Have regard to – and be compatible with – the Cotswolds AONB Landscape Character Assessment and Landscape Strategy and Guidelines

5.2.1 Table 8-7 of **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** provides a summary of the landscape character assessments within the 5 km study area, including those that have been scoped into the assessment of the Scheme. At a local level, LCT11, LCA11A, LCT14 and

LCA14A as identified in the Cotswolds National Landscape Character Assessment are scoped into the assessment.

5.2.2 Landscape character areas within the Cotswold AONB Landscape Character Assessment are described in Paragraphs 8.8.88 to 8.8.111 of **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]**. In addition, the Landscape Character Assessment of the Cotswold AONB is shown on **ES Volume 2, Figure 8-5: Landscape Character Areas [APP-094]**.

5.2.3 Section 8.8 of **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** makes reference to the Cotswolds AONB Landscape Strategy and Guidelines for the scoped in Landscape Character Areas (LCT11 Dip slope Lowland and LCT14 Cornbrash Pastoral Lowlands). The full descriptions of LCT11 and LCT14 are provided in **ES Volume 3, Appendix 8-4 Landscape Character Area Descriptions [APP-195]**.

5.2.4 Given the above, the assessment of the likely significant landscape and visual effects as a result of the Scheme set out in **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** has had regard to the Cotswold AONB Landscape Character Assessment.

Adverse impacts to tranquillity

5.2.5 For ease in assessing the effects on the tranquillity of the CNL across the Environmental Impact Assessment, the **Tranquillity Technical Note [PDA-010]** summarises which parts of the Environmental Statement refer to relevant receptors within and/or adjacent to the CNL, the effects that are anticipated on these receptors and the mitigation measures proposed. This confirms that no significant effects are anticipated on receptors within or directly adjacent to the CNL in relation to landscape, cultural heritage, transport and access, and noise and vibration. Significant visual effects are anticipated in relation five receptors which have a visual relationship with the CNL (including views to and from), and significant tourism and recreation effects are anticipated in relation to seven tourism and recreation receptors within or directly adjacent to the CNL, as set out in the tables below.

Table 5-1 Significant visual effects within or directly adjacent to the CNL

Receptor	Significant Effect
Construction Phase and Operation Phase Year 1 (reducing to not significant at Operation Year 15 and Decommissioning)	
RI014 Widley's Farm, Sherston	Moderate adverse

Receptor	Significant Effect
RI024 Fosse Lodge, Grittleton	Moderate adverse
TP037 Footpath WT/NORT/1	Major/moderate adverse
TR145 Fosse Way	Moderate adverse
TR154 Road Junction Southfields South East Y Junction, Sherston	Moderate adverse

Table 5-2 Significant socio-economic, tourism and recreation effects within or directly adjacent to the CNL

Receptor	Significant Effect
Construction Phase	
Unsurfaced highway, Track crossing railway, Rodbourne	Medium term temporary moderate adverse
Unsurfaced highway, Track parallel to railway, Rodbourne	Medium term temporary moderate adverse
Fosse Way	Medium-term temporary moderate adverse
Long Path	Medium-term temporary moderate adverse
Palladian Way	Medium-term temporary moderate adverse
Wiltshire Way	Medium-term temporary moderate adverse
Equestrian facilities: Park Farm	Medium-term temporary moderate adverse
Operation and Maintenance Phase	
Fosse Way	Long-term temporary moderate adverse
Decommissioning	
Fosse Way	Medium-term temporary moderate adverse
Long Path	Medium-term temporary moderate adverse
Palladian Way	Medium-term temporary moderate adverse
Wiltshire Way	Medium-term temporary moderate adverse

5.2.6 Proposed mitigation measures to mitigate the visual effects of the Scheme on the CNL are set out in the **Outline CEMP [REP6-029], Outline OEMP [REP6-031], Outline Decommissioning Strategy [REP6-033] and Outline Landscape and Ecological Management Plan [REP6-037].** Proposed mitigation measures to mitigate the socio-economic, tourism and recreation effects of the Scheme on the CNL during the construction, operation and maintenance, and decommissioning phases are detailed in the **Outline CEMP [REP6-029], Outline OEMP [REP6-031], Outline Decommissioning Strategy [REP6-033], Outline PRoW and**

Permissive Paths Management Plan [REP1-104] and the **Outline Skills, Supply Chain and Employment Plan [REP3-104]**.

5.2.7 The above significant effects have been considered by the Applicant in the application of the planning balance, with landscape and visual being afforded moderate negative weight overall and tourism and recreation having been afforded limited negative weight overall. More generally, it is considered that these effects are far outweighed by the wider benefits of the Scheme, including proposed enhancements to PRoW, such as 12.8 km of new permissive paths as set out in the **Outline PRoW and Permissive Paths Management Plan [REP1-104],** which will enhance connectivity in the local area and will help to improve recreation in the immediate vicinity, secondarily benefitting local population health and wellbeing in the long term.

5.3 Heliographic effect

5.3.1 Section 2.3.5 of this Annex summarises the findings of an assessment of likely effects of the Scheme on Glint and Glare as presented in Section 20.5 of **ES Volume 1, Chapter 20: Other Environmental Matters [REP5-028]**. Taking into account the embedded mitigation measures, the Scheme is considered to not have significant impacts as a result of Glint and Glare.

5.3.2 Section 20.5 of **ES Volume 1, Chapter 20: Other Environmental Matters [REP5-028]** sets out the embedded mitigation measures which have been incorporated into the Scheme's design, this includes:

- Incorporation of setbacks from dwelling receptors where practicable;
- Commitment to the use of single axis tracking Solar PV Panels where required and implementing a resting angle of 5° (field C14); and
- Commitment to the use of 2.5m 1P fixed south facing panels where required (field B11).

5.3.3 In addition, how the Scheme is constructed, operated and maintained, and decommissioned would be appropriately controlled in order to manage and minimise potential environmental effects.

5.3.4 Although not considered within the Glint and Glare Assessment, the **Outline CEMP [REP6-029]** and **Outline OEMP [REP6-031]** note that existing vegetation along the boundary of the Order Limits will be retained and managed where practicable to ensure its continued presence and to aid the screening of low-level views into the Order Limits.

5.3.5 The Scheme has therefore fully considered heliographic effects and incorporates embedded mitigation measures into design to avoid and reduce potential impacts and effects associated with the Scheme.

5.4 Summary

5.4.1 Overall, the above demonstrates how tranquillity in the CNL has been considered in the assessment of the Scheme and how the Scheme is in accordance with the Tranquillity Position Statement.

6 Dark Skies and Artificial Light Position Statement

6.1.1 The CNL Board Position on Dark Skies and Artificial Lighting highlights the importance of dark skies in the CNL and provides proactive measures to maintain and enhance the area's dark skies.

6.1.2 The key considerations of the Dark Skies and Artificial Lighting Position Statement include the following:

- Policy CE5: Dark Skies of the Cotswolds AONB Management Plan 2018-2023.
- Light pollution – controlling residual light spill from developments.
- Cotswolds AONB Landscape Strategy and Guidelines.

6.2 Policy CE5 (Dark Skies) of the Cotswolds AONB Management Plan

6.2.1 Policy CE5 of the Cotswolds AONB Management Plan 2018-2023 states that:

1. Proposals that are likely to impact on the dark skies of the Cotswolds AONB should have regard to these dark skies, by seeking to (i) avoid and (ii) minimise light pollution.

2. Measures should be taken to increase the area of dark skies in the Cotswolds AONB by (i) removing and (ii) reducing existing sources of light pollution.

3. Consideration will be given to seeking a formal dark sky designation for those parts of the Cotswolds AONB that are least affected by light pollution.

Avoid and minimise lighting

6.2.2 Although the CNLMP has been superseded by a newer version (CNLMP 2025-2030) and the policy wording for dark skies has been revised, the underlying policy position remains unchanged. See Section 2.4 of this Annex for how the Scheme seeks to avoid and minimise lighting to conserve the CNL.

Removing and reducing existing sources of lighting

6.2.3 Although the CNLMP has been superseded by a newer version (CNLMP 2025-2030) and the policy wording for dark skies has been revised, the underlying policy position remains unchanged. See Section 2.4 of this Annex which addresses the removal and reduction of existing sources of lighting.

Consideration of formal dark sky designation

6.2.4 Although the CNLMP has been superseded by a newer version (CNLMP 2025-2030) and the policy wording for dark skies has been revised, the underlying policy position remains unchanged. See Section 2.4 of this Annex which addresses the consideration of a formal dark sky designation.

6.3 Light pollution

6.3.1 Light pollution as a result of the Scheme has been minimised through the implementation of a lighting strategy as set out within Section 3.4 and Section 3.5 of **ES Volume 1, Chapter 3: The Scheme [APP-055]**. Section 2.3.3 and 2.3.4 of this Annex summarises the lighting strategy which confirms that temporary site lighting would be used during construction to enable safe working during construction in hours of darkness or where natural lighting is unable to reach. Appropriate measures would be implemented to prevent or reduce the impact on human and ecological receptors arising from this temporary lighting. During operation, lighting would be minimal, limited only to motion sensory security lighting at substation compounds and the BESS.

6.3.2 The Scheme therefore embeds good design measures to reduce the impact of lighting and introduces no permanent sources of lighting pollution in proximity to the CNL.

6.4 Cotswolds AONB Landscape Strategy and Guidelines

6.4.1 Section 3.4 of **ES Volume 3, Appendix 8-6: Assessment of the Effects on the Cotswolds National Landscape and its Special Qualities [REP6B-006]** considers the Cotswolds AONB Landscape Strategy and Guidelines in relation to dark skies. It concludes that the Scheme's lighting design is dark-sky-compliant and would ensure that the dark skies within the CNL remain intact. Furthermore, the lack of operational lighting would also ensure that wildlife corridors, particularly bat foraging areas are unaffected by light pollution with the CNL's dark skies contributing to a high-quality night-time environment for wildlife.

6.5 Summary

6.5.1 Overall, the above demonstrates that the Scheme conserves the dark skies within the CNL and therefore complies with the Dark Skies and Artificial Lighting Position Statement.

7 Tree Species and Provenance Position Statement

7.1.1 The CNL Board Position Statement on Tree Species and Provenance provides guidance for woodland creation, restocking and individual tree planting that aims to develop resilience to climate change and disease whilst keeping in character with the Cotswold landscape and existing woodlands.

7.1.2 The overarching recommendation of the Position Statement states:

Future tree planting should seek to retain the character of existing Cotswold woodlands whilst considering species diversity, genetic diversity (provenance and origin) and assisted migration. Species selection also needs to take account of the context of the planting e.g. extending ancient woodland or creating a stand-alone plantation.

7.1.3 The following sections set out details of planting for the Scheme and how is aligns with the above recommendation.

7.2 Tree Planting Strategy

7.2.1 Section 8.9 of **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** sets out landscape mitigation measures that would be embedded into the Scheme's design, including tree planting. These are summarised in Section 4.3.3 of this Annex and comprises avoidance measures, buffers and offsets, retention and enhancement of the existing landscape framework, and positive enhancements to enhance the landscape character. The implementation of these mitigation measures would provide long term screening, structural benefits to the landscape and wider Green Infrastructure, habitat connectivity, and reinforce the existing character of the landscape. In addition, the new planting would provide a varied landscape in terms of management and vegetation, and overall enhancement and strengthening of the LCA with new planting where appropriate.

7.2.2 Section 8.9 and Table 8-14 of **ES Volume 1, Chapter 8: Landscape and Visual [REP6B-004]** outlines the planting typologies which have been proposed across the Scheme and are characteristic of the landscape setting that links the existing habitat. In terms of tree planting this includes:

- Green corridor and woodland planting – proposed native woodland belt, proposed native woodland block and proposed tree planting.
- Enhanced riparian native planting – scattered tree and hedge planting adjacent to watercourses.
- Reinforced road side vegetation – proposed linear tree planting.

- Proposed hedgerows – proposed native hedgerows with trees.
- Groundcover – existing vegetation to be retained and enhanced.

ES Volume 2, Figure 3-4 Landscape and Ecology Mitigation Plan [REP6B-009] illustrates these planting typologies whilst the **Outline LEMP [REP6-037]** provides further detail on how these habitats will be created and managed.

7.2.3 In addition, the **Biodiversity Net Gain Assessment Report [REP6-024 and as updated for Deadline 7]** calculates the proportion of new planting to be provided, including:

- 11.04 ha of new native broadleaved woodland;
- 9.43 km of new lines of trees;
- 15.90 km of new native hedgerows;
- 619 ha of new improved grassland; and
- 4.43 ha of mixed scrub planting.

This is shown on the indicative layout of the Solar PV Sites (refer to **ES Volume 2, Figure 3-1: Indicative Site Layout Plan [REP3-035]**).

7.2.4 Tree species to be planted have been carefully selected to reflect the species identified within the Solar PV Sites to ensure that they are locally appropriate. Table 2, Table 3 and Table 4 of the **Outline LEMP [REP6-037]** detail the tree species to be planted within the Scheme.

7.2.5 In addition, the **Outline LEMP [REP6-037]** states in paragraphs 1.3.40 and 1.3.54 that planting will focus on long-lived trees to replace the frequent ash trees which are prone to ash dieback and that planting trees not identified in the local area which are ecologically similar to ash or are resistant to both disease and climate change impacts may be desirable.

7.3 Summary

7.3.1 Given the above, it can be demonstrated that the Scheme accords with the Trees and Provenance Position Statement, proposing planting which both retains and reflects the existing character of the landscape. In addition, proposed planting has taken into account opportunities to minimise climate change.

8 Summary

8.1.1 Overall, the Scheme demonstrates a clear alignment with the Cotswolds National Landscape Management Plan and the Board's Position Statements, including relevant guidance and assessments set out by the CNL Board.

8.1.2 The Scheme reflects a thorough understanding of the Board's priorities to conserve and enhance the Cotswolds National Landscape. Through the application of relevant assessments and embedded mitigation measures, the Scheme seeks to deliver a large scale solar development which avoids and reduces impacts and effects on the designation as far as practicable. In addition, the Scheme will provide benefits to the Cotswolds National Landscape through extensive planting and the delivery of permissive paths within the setting of the CNL which will enhance connectivity and recreation in the area.

8.1.3 In conclusion, the Scheme therefore comprises a development which meets the urgent need for low carbon renewable energy whilst also conserving the natural beauty of the Cotswold National Landscape.

9 References

Ref 1 Cotswolds National Landscape Management Plan 2025-2030. Available at: https://www.cotswolds-nl.org.uk/wp/wp-content/uploads/2025/11/CNL-MANAGEMENT-PLAN_2025-30-FINAL.pdf

Ref 2 Ministry of Housing, Communities and Local Government (2024). National Planning Policy Framework. Available at: National Planning Policy Framework

Ref 3 Net Zero Cotswolds. Available at: Net Zero Cotswolds - Cotswolds National Landscape

Ref 4 Cotswolds National Landscape Climate Change Strategy (2022). Available at: CNL-Climate-Change-Strategy-Adopted-Feb-2022.pdf

Ref 5 Cotswolds National Landscape Board Position Statement – Renewable Energy (2023). Available at: https://www.cotswolds-nl.org.uk/wp/wp-content/uploads/2024/11/Renewable-Energy-June-2023.pdf

Ref 6 Ministry of Housing, Communities and Local Government (2021). National Planning Policy Framework. Available at: [ARCHIVED CONTENT] National Planning Policy Framework - GOV.UK

Ref 7 Cotswold Conservation Board Position Statement – Development in the setting of the Cotswolds AONB (2016). Available at: https://www.cotswolds-nl.org.uk/wp/wp-content/uploads/2024/11/setting-position-statement-2016-adopted-with-minor-changes-30616-1.pdf

Ref 8 Ministry of Housing, Communities and Local Government (2012). National Planning Policy Framework. Available at: [ARCHIVED CONTENT] National Planning Policy Framework - GOV.UK

Ref 9 Cotswold Conservation Board Position Statement – Tranquillity (2019). Available at: https://www.cotswolds-nl.org.uk/wp/wp-content/uploads/2024/11/Tranquillity-Position-Statement-FINAL-June-2019.pdf

Ref 10 Cotswold Conservation Board Position Statement – Dark Skies and Artificial Light (2019). Available at: https://www.cotswolds-nl.org.uk/wp/wp-content/uploads/2024/11/Cotswolds-Dark-Skies-Artificial-Light-Position-Statement.pdf

Ref 11 Cotswold Conservation Board Position Statement – Woodland Creation and Tree Planting in the Cotswold AONB - Tree Species and Provenance (2023). Available at: https://www.cotswolds-nl.org.uk/wp/wp-content/uploads/2024/11/Position-Statement-on-Tree-Species-and-Provenance-June-2017-0723.pdf