Meridian Solar Farm

EN010169

Volume 7

Other Documents

7.1 Appendix B: National Policy Statement Accordance Tables

APFP Regulation 5(2)(q)

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

March 2026

Contents

1. Overarching National Policy Statement for Energy (EN-1)

1.1.1. Table 1-1 below details the policies within the Overarching National Policy Statement for Energy (EN-1) (December 2025). Policies which are not relevant to the Scheme are not included within this table.

Table 1-1 Relevant Policies within EN-1

Part	EN-1 Policy Text	Assessment
EN-1 Part 4 – Assessment Principles		
4.1 General policies and considerations	4.1.1 This part of EN-1, Assessment Principles, sets out the general policies for the submission and assessment of applications relating to energy infrastructure.	The Scheme meets the requirements of the relevant NPSs (EN-1, EN-3 and EN-5). Therefore, the presumption in favour of granting consent should apply, given the urgent need for this type of infrastructure. The Applicant is aware that the SoS is to start with a presumption in favour of granting consent for energy NSIPs that support the provision of low carbon infrastructure unless any more specific NPS Policies indicate otherwise. The **Planning Statement** (Doc Ref. 7.1) sets out a summary of the need for the Scheme. The Applicant recognises the provisions of Paragraph 4.1.1 of NPS EN-1 in the SoS determination of the Scheme and has sought to ensure the Development Consent Order (DCO) Application is consistent with the instructions and guidance of the relevant NPSs. As concluded within the **Planning Statement** (Doc Ref. 7.1), there is no reason why this presumption in favour of granting consent should not apply.
	4.1.2 The Clean Power 2030 Action Plan, Energy White Paper and British Energy Security Strategy all emphasise the importance of the government's net zero commitment and efforts to fight climate change, as well as the need to maintain a secure and reliable energy system. The Levelling Up White Paper calls on the Government to ensure investment in the transition to net zero benefits less well-performing parts of the UK, reducing emissions, facilitating economic development creation of jobs.	
	4.1.3 Given the level and urgency of need for infrastructure of the types covered by the energy NPSs set out in Part 3 of this NPS, the Secretary of State will start with a presumption in favour of granting consent to applications for energy NSIPs. That presumption applies unless any more specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused.	
	4.1.4 The presumption is also subject to the provisions of the Planning Act 2008 referred to at paragraph 1.1.4 of this NPS.	
Weighing impacts and benefits	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 the Clean Power 2030 Mission and Net Zero, 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 **Planning Statement** (Doc Ref. 7.1) sets out the planning balance of the Scheme, drawing together the likely significant beneficial effects of the Scheme and the likely significant residual adverse effects. In the case of the Scheme, the ES Chapters (Doc Ref 6.1) assess each of the environmental topics and report any residual significant adverse effects. The Scheme does not have an unacceptable interference with human health and public safety, defence, irreplaceable habitats or pose an unacceptable risk to achievement of net zero. In addition, there are substantial benefits that would be achieved by the Scheme as demonstrated within Section 4 of the **Planning Statement** (Doc Ref. 7.1). The balance is in favour of approval. The Scheme is a well-considered and effectively designed proposal that responds to the locality and is sensitive to the local environment. It is therefore concluded that Development Consent should be granted.
	4.1.6 In this context, the Secretary of State should take into account environmental, social and economic benefits and adverse impacts, at national, regional and local levels. These may be identified in this NPS, the relevant technology specific NPS, in	The **Planning Statement** (Doc Ref. 7.1) sets out the planning balance for the Scheme. This document demonstrates that the Scheme is broadly compliant with the relevant NPSs,

Part	EN-1 Policy Text	Assessment
	the application or elsewhere (including in local impact reports, marine plans, and other material considerations as outlined in Section 1.1).	NPPF, and Local Plans. The **Environmental Statement** has further assessed these policies (local, regional and national levels) against each topic (See **ES Chapters 5-16**, Doc Ref. 6.1).
	4.1.7 Where this NPS or the relevant technology specific NPSs require an applicant to mitigate a particular impact as far as possible, but the Secretary of State considers that there would still be residual adverse effects after the implementation of such mitigation measures, the Secretary of State should weigh those residual effects against the benefits of the proposed development. For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects not capable of being addressed by application of the mitigation hierarchy, 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, or irreplaceable habitats. 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. See paragraph 4.2.28 of this NPS for further detail.	The residual adverse effects associated with the Scheme's construction, operation (and maintenance) and decommissioning phases have been identified across the **Environmental Statement**. Each Chapter highlights, where required (and to the extent that has been reasonably practicable), environmental measures have been proposed to minimise the residual significance of effect to the lowest reasonably practicable level (See **ES Chapter 5-16**, Doc Ref. 6.1). Any remaining residual adverse effects, after the implementation of mitigation measures, have been weighted against the benefits of the Scheme within the **Planning Statement.** The **Planning Statement** concludes that the SoS should give appropriate weight to the benefits of the Scheme when considering the planning balance. The Scheme is ascribed CNP status within the NPSs and therefore benefits from the direction that any residual adverse effects which remain after the implementation of mitigation will be outweighed by the benefits of the Scheme. None of the exceptions to this policy as listed within paragraph 4.1.7 apply to the Scheme.
Land Rights	4.1.8 Where the use of land at a specific location is required to facilitate the development by providing for mitigation and landscape enhancement, an applicant may, as part of its application to the Secretary of State, seek the compulsory acquisition of that land, or rights over that land.	The Applicant needs to obtain and use statutory powers to compulsory acquire land and rights over land, and to possess and use land temporarily to implement the Scheme. In order to do so, the Applicant is required to provide evidence that the use of these powers would be justified, proportionate and in the public interest, and this evidence is set out in the **Statement of Reasons** (Doc Ref. 4.1), the **Funding Statement** (Doc Ref. 4.2) and the **Book of Reference** (Doc Ref. 4.3). Given the national and local need for the Scheme and the support from it found in policy, as well as the suitability of the Order Limits, compulsory acquisition of the land and rights and the temporary use of land, together with the overriding of interests, rights and restrictive covenants and the suspension or extinguishment of private rights is justified.
	4.1.9 The Secretary of State will consider any such application under the usual compulsory acquisition principles, taking into account the content of the NPSs.	
Other Documents	4.1.10 The policy set out in this NPS and the technology specific energy NPSs is intended to provide greater clarity around existing policy and practice of the Secretary of State in considering applications for nationally significant energy infrastructure, (or therefore the "benchmark" for what is, or is not, an acceptable nationally significant energy development).	The Scheme falls within the definition and thresholds for a 'Nationally Significant Infrastructure Project' as it comprises a generating station of more than 100 MW and the installation of above ground electric lines greater than two kilometres in length and a nominal voltage of 132kV or greater. The Scheme therefore qualifies as an NSIP under sections 14(1)(a), 14(1)(b), 15(2) and 16 of the PA 2008. Section 5 Legislation and Policy Context and Section 6 Planning Assessment of the **Planning Statement** (Doc Ref. 7.1), sets out all the relevant policy at the local, regional and national
	4.1.11 The energy NPSs have taken account of the National Planning Policy Framework (NPPF), the Planning Practice Guidance for England, and Planning Policy Wales and Technical Advice Notes (TANs) for Wales, where appropriate.	

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	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.	level and provides an assessment of these policies against the components of the Scheme. The policy documents include the relevant NPSs, NPPF and the relevant Local Plans.
	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.	The Scheme lies within the administrative boundaries of Lincolnshire County Council and South Holland District Council. The development plan applicable to the Site comprises the South East Lincolnshire Local Plan, a joint plan with Boston Borough Council, South Holland District Council and Lincolnshire County Council. This was adopted in 2019, covering the period from 2011 to 2036. A formal review process began in 2024, led by the South East Lincolnshire Joint Strategic Planning Committee, the joint committee voted to support five key recommendations from the review report. Further updates and public engagement are expected as the review progresses including potential amendments to policies and monitoring frameworks. Therefore, the level of weight which those proposed new policies can be afforded is currently limited. Should a local plan update be published, the Applicant will consider any proposals within it against the Scheme. The Schemes' compliance with the adopted local plan has been considered within **Appendix C: NPFF and Local Policy Accordance Table** (Doc Ref. 7.1)
	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.	
	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.	
	4.1.16 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.	At present, the paragraph is not relevant to the Scheme as no conflicts have been identified between national policy and other planning policies. Should a local plan update be published, the Applicant will consider any proposals within it against the Scheme.
Development Consent	4.1.17 The Secretary of State should only impose requirements in relation to a development consent that are necessary, relevant to planning, relevant to the development to be consented, enforceable, precise, and reasonable in all other respects.	The **Draft DCO** (Doc Ref. 3.1) includes Requirements at Schedule 2 which are considered necessary to control the delivery of the Scheme. The Applicant considers that the provisions within the Draft DCO meet the tests listed. Further detail on the need for each requirement is set out within the **Explanatory Memorandum** (Doc Ref. 3.2).
	4.1.18 The Secretary of State should consider the guidance in the NPPF, the Planning Practice Guidance: Use of Planning Conditions, and TANs, or any successor documents, where appropriate.	
	4.1.19 The Secretary of State may consider any development consent obligations that an applicant agrees with local authorities. These must be relevant to planning, necessary to make the proposed development acceptable in planning terms, directly related to the proposed development, fairly and reasonably related in scale and kind to the proposed development, and reasonable in all other respects.	The Applicant has not identified the need for planning obligations. Should such a need be identified, the Applicant will submit any such proposed planning obligation to the ExA and/or SoS for consideration.
Early Engagement	4.1.20 Early engagement both before and at the formal pre-application stage between the applicant and key stakeholders, including public regulators, Statutory	The Applicant has conducted an ongoing programme of consultation and engagement to inform the design of the Scheme. The Applicant recognises the importance of consulting on

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	Consultees (including Statutory Nature Conservation Bodies (SNCBs)), and those likely to have an interest in a proposed energy infrastructure application, is strongly encouraged in line with the Government's pre-application guidance. This means that only applications which are fully prepared and comprehensive can be accepted for examination, enabling them to be properly assessed by the Examining Authority and leading to a clear recommendation report to the Secretary of State.	the Scheme from an early stage and the benefits could bring in terms of delivering an improved Scheme. The Applicant has set out details of its public consultations within the **Consultation Report** (Doc Ref. 5.1). Details of technical engagement with stakeholders are set out within each of the topic-specific **ES Chapters** (Doc Ref. 6.1). These two documents evidence compliance with the pre-application consultation requirements within the PA 2008, APFP Regulations, EIA Regulations 2017, and the MHCLG pre-application guidance (2024). The Applicant is progressing Statements of Common Ground which will be updated throughout the course of the Examination.
	4.1.21 This is particularly so in the case of HRA matters covered in paragraphs 5.4.26 to 5.4.32 below, which explain the onus is on the applicant to submit sufficient information to enable the Secretary of State to conduct an Appropriate Assessment if required.	**ES Appendix 9-14: Habitat Regulations Assessment Report** (Doc Ref. 6.3) provides information to allow the SoS to determine whether there will be an adverse effect on the integrity of any European Site(s) in view of their Conservation Objectives (COs) as a result of the Scheme. This has been produced in consultation with Natural England. It concludes that there would be no significant adverse effects on the integrity of any European sites (either alone or in combination with other plans or projects).
Financial and technical viability	4.1.22 In deciding to bring forward a proposal for infrastructure development, the applicant will have made a judgement on the financial and technical viability of the proposed development, within the market framework and taking account of government interventions.	The Applicant has followed a site selection process that has taken into account environmental, physical, technical, social and commercial considerations and opportunities, as well as engineering requirements. Therefore, the Applicant is confident that they have developed a sensitive and technically viable proposal at this stage. The **Funding Statement** (Doc Ref. 4.2) is submitted alongside the DCO application setting out how the Scheme is to be funded, including the compulsory acquisition and compensation.
	4.1.23 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 (any exceptions to this principle are dealt with where they arise in this, or other energy NPSs, and the reasons why financial viability or technical feasibility is likely to be of relevance explained).	
4.2 The critical national priority for low carbon infrastructure		
Applicant's Assessment	4.2.23 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 Applicant has considered this NPS and relevant technology specific NPS's, applying the mitigation hierarchy, as well as any other legal and regulatory requirements. The **Environmental Statement** provides the baseline environmental information available for the study areas that relevant for the environmental assessment undertaken, the description of the likely environmental effects arising from the Scheme, and the mitigation measures envisaged to avoid, reduce or mitigate adverse environmental effects for the Scheme, as well as any necessary monitoring measures. Each ES Chapter considers the application of embedded mitigation measures in the first instance, followed by the application of additional measures to reduce or mitigate the effects any further. This results in the residual impacts as summarised in **ES Chapter 18: Summary of Likely Significant Effects** (Doc Ref. 6.1). In addition, the Applicant has ensured that there has been an application of mitigation
	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 significant reduction in generation capacity for CNP infrastructure are unlikely to be considered to be appropriate as mitigation. There may be exceptional circumstances where the mitigation could have a significant benefit and warrant a small reduction in generation capacity and	

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	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.	hierarchy over the course of the Scheme, having started the site selection stage in order to avoid, reduce or and minimise impacts but has also informed the Scheme design.
	4.2.25 Compensation, by definition, does not reduce an adverse effect resulting from a development. However, applicants should set out how residual impacts will be compensated for as far as possible. Applicants should also set out how any mitigation or compensation measures will be monitored and reporting agreed to ensure success and that action is taken. Changes to measures may be needed e.g. adaptive management. The cumulative impacts of multiple developments with residual impacts should also be considered.	The **ES Chapters 5-16** (Doc Ref. 6.1) are structured to outline the construction, operation (and maintenance) and decommissioning phase impacts of the Scheme. The **ES Chapters 5-16** (Doc Ref. 6.1) identify the significance of an effect upon an assessed receptor, taking account of the environmental measures secured by the Scheme's design. **ES Chapter 17: Effect Interactions** (Doc Ref. 6.1) assesses the 'intra-project' cumulative effects, with each **ES Chapter** (Doc Ref. 6.1) assessing the impact of the Scheme cumulatively with relevant developments within the Zone of Influence (the 'inter-project' cumulative effects). To ensure clarity as to how mitigation is secured, **Environmental Mitigation and Commitments Register** (Doc Ref. 7.7) has been included within the submission. This Register follows PINS Guidance and identifies how commitments will be secured and implemented, to ensure potential environmental effects arising from the project are mitigated as far as possible, in accordance with the mitigation hierarchy, and as set out in the technical assessments detailed in the topic-specific chapters of the ES. The **Environmental Mitigation and Commitments Register** (Doc Ref. 7.7) links to the management plans secured and monitored via the **Draft DCO** (Doc Ref. 3.1). No compensation measures are identified through the assessments.
	4.2.26 Where residual impacts relate to HRA or MCZ sites then the Applicant must provide a derogation case, if required, in the normal way in compliance with the relevant legislation and guidance.	The Scheme's construction, operation and maintenance and decommissioning phases would not give rise to residual impacts relating to HRA.
Secretary of State decision making	4.2.27 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.	As described above, the Applicant's assessment through the EIA, as set out in the ES, demonstrates that the requirements for considering stakeholder consultation, residual impacts, the mitigation hierarchy and relevant policy and legislative tests under the NPSs and other legislation have been complied with.
Non-HRA and non-MCZ residual impacts of CNP infrastructure	4.2.28 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, defence or irreplaceable habitats. Further, the same exception applies to this presumption for	The Applicant acknowledges that there would be a number of significant adverse residual effects of the Scheme, following the application of the mitigation hierarchy (as far as it has been reasonably practicable). Having followed the mitigation hierarchy, there are no residual impacts that are considered to present an unacceptable risk to, or interference with, human health and public safety, defence, public safety, offshore navigation or onshore flood and coastal erosion risk, that would reverse this presumption. The Applicant is confident that the residual adverse effects

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	residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk.	associated with the Scheme do not amount to 'the most exceptional circumstances' for where the CNP policy would not apply. Therefore, given the urgent need for the Scheme, the need outweighs the residual adverse effects. The Scheme does not rely on the starting assumptions in paragraph 4.2.30 as it does not include any development that engages any of those four tests (i.e. it is not in the Green Belt, no significant adverse effects to any SSSIs, not in a nationally designated landscape, or substantial harm or loss of significance is reported to any heritage assets).
	4.2.29 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.	
	4.2.30 This means that the Secretary of State will take as a starting point that CNP Infrastructure will meet the following, non-exhaustive, list of tests: • where development within a Green Belt requires very special circumstances to justify development; • where development within or outside a Site of Special Scientific Interest (SSSI) requires the benefits (including need) of the development in the location proposed to clearly outweigh both the likely impact on features of the site that make it a SSSI, and any broader impacts on the national network of SSSIs. • where development in nationally designated landscapes requires exceptional circumstances to be demonstrated; and • where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional.	
HRA derogations and MCZ assessments for CNP infrastructure	4.2.31 Any HRA or MCZ residual impacts will continue to be considered under the framework set out in the Habitats Regulations and the Marine and Coastal Access Act 2009 respectively.	This paragraph is not relevant to the Scheme as the Marine and Coastal Access Act 2009 dos not apply nor would the Scheme's construction, operation and decommissioning phases would not give rise to residual impacts relating to HRA.
4.3 Environmental Effects/Considerations		
Applicant Assessment	4.3.10 The applicant must provide information proportionate to the scale of the project, ensuring the information is sufficient to meet the requirements of the EIA Regulations.	The Scheme is based on a parameter-led level of detail (provided for in the EIA process that is proportionate to the scale of the Scheme). The EIA Process has made effective use of Scoping, ongoing engagement, and the other digital outputs to deliver a proportionate approach. Where full details cannot be provided, the ES assesses the maximum development parameters (or the parameters that represent the reasonable worst case for likely significant environmental effects, should that be different), which allows flexibility for elements that are likely to require more detailed design after the submission of the ES. In response to Paragraph 4.3.12, the Applicant confirms that each aspect chapter (**ES Chapters 5-16**, Doc Ref 6.1) sets out the assumptions made regarding the maximum design scenario relevant to that chapter and for each impact.
	4.3.11 In some instances, it may not be possible at the time of the application for development consent for all aspects of the proposal to have been settled in precise detail. Where this is the case, the applicant should explain in its application which elements of the proposal have yet to be finalised, and the reasons why this is the case.	
	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.	
	4.3.13 To help the Secretary of State consider thoroughly the potential effects of a proposed project in cases where the EIA Regulations do not apply and an ES is not therefore required, the applicant should instead provide information proportionate	

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	to the scale of the project on the likely significant environmental, social, and economic effects.	
	4.3.14 References to an ES in this NPS and the technology specific NPSs should be taken as including a statement which provides this information, even if the EIA Regulations do not apply. Where the NPSs require specific information to be provided in the ES, such information should still be provided in this statement.	
	4.3.15 Applicants are obliged to include information about the reasonable alternatives they have studied, in their ES. 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.	**ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1) and **Appendix D: Site Selection Report** (Doc Ref. 7.1) provide a description of the detailed site selection and assessment of alternatives process undertaken by the Applicant. The Site Selection Report considers the locational criteria (being environmental, social and economic, electrical and engineering constraints) which geographically influenced the area of search. Following the selection of the preferred locations for the components of the Scheme, based on the application of the locational criteria and factors mentioned above, further optioneering and the identification of a preferred design was undertaken as described in **ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1). This underwent further technical and feasibility assessments and consideration against a set of core design principles which are described in the **Design Approach Document** (Doc Ref. 7.3).
	4.3.16 In some circumstances, the NPSs may impose a policy requirement to consider alternatives.	
	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.	
Secretary of State decision making	4.3.18 The Secretary of State should consider the worst-case impacts in its consideration of the application and consent, providing some flexibility in the consent to account for uncertainties in specific project details.	**ES Chapter 2: The Scheme** (Doc Ref. 6.1) details the use of the Rochdale Envelope approach, which has been adopted to present a reasonable worst-case assessment of the potential environmental effects of the Scheme. The list of parameters for each of the Works is set out in the **Works Plans** (Doc Ref. 2.3), which set the maximum spatial extent of each Work that forms the authorised development. Where parameters have been adopted, these are realistic and considered worst-case estimations of future design parameters as set out within the **Design Parameters** (Doc Ref. 7.4). Therefore, each aspect chapter of the ES (**ES Chapters 5-16**, Doc Ref. 6.1) assesses the 'realistic worst-case' scenario for each of the identified potential impacts. Each aspect assessment has taken the maximum design scenario approach which considers the likely worst case environmental, social and economic effects. In addition, the inter-relationship of different disciplines across the physical, biological, ecological and human environments during the construction, operation, and decommissioning phases of the Scheme have been considered across **ES Chapters 5-16** and with the Scheme's intra-project
	4.3.19 The Secretary of State should consider how the accumulation of, and interrelationship between, effects might affect the environment, economy, or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place.	

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		effects reported in **ES Chapter 17: Effect Interactions** (Doc Ref. 6.1). These chapters consider and assess cumulative effects as well as the environmental measures for the construction, operation and decommissioning of the Scheme. Based on the above assessment, the Applicant considers that the approach and level of information contained within the ES is consistent with the requirements of Paragraphs 4.3.18 and 4.3.19.
	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 Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1) provides a description of the assessment of alternatives and design development process undertaken by the Applicant. **Appendix D: Site Selection Report** (Doc Ref. 7.1) details the site selection process in light of the relevant policy considerations set out in the relevant policy documents. The assessment of options is considered against the context of the urgent national need for renewable energy and, more specifically, the role of the Scheme in the Net Zero transition. The Site Selection Report considers the locational criteria (being environmental, social and economic, electrical and engineering constraints) which geographically influenced the area of search. Following the selection of the preferred locations for the components of the Scheme, based on the application of the locational criteria and factors mentioned above, further optioneering and the identification of a preferred design was undertaken as described in **ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1). This underwent further technical and feasibility assessments and consideration against a set of core design principles which are described in the **Design Approach Document** (Doc Ref. 7.3). The Applicant is of the view that the consideration of alternatives undertaken is proportionate in line with the policy requirements within EN-1, EN-3 and EN-5.
	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 Applicant notes this paragraph and the onus it places on other places on other person(s) to propose and, importantly, evidence the suitability of such alternative sites. The Applicant has prepared **ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1), which provides a description of the assessment of alternatives and design development process undertaken by the Applicant. **Appendix D: Site Selection Report** (Doc Ref. 7.1) details the site selection process in light of the relevant policy considerations set out in the relevant policy documents.
4.4 Health		
Applicant Assessment	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.	An assessment of likely impacts and effects for human health (Section 10.8 Assessment of Likely Impacts and Effects, along with any mitigation (Section 10.7 Embedded Mitigation), is set out in **ES Chapter 10: Human Health** (Doc Ref. 6.1).

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	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.	An assessment of cumulative effects is presented in Section 10.11 cumulative effects of **ES Chapter 11: Human Health** (Doc Ref. 6.1).
	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.	An assessment of likely impacts and effects for human health (Section 10.8 Assessment of likely impacts and effects), along with any mitigation (Section 10.7 Embedded Mitigation), is set out in **ES Chapter 10: Human Health** (Doc Ref. 6.1), this includes consideration of potential impacts on vulnerable groups within society.
Secretary of State decision making	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.	Section 10.8 Assessment of Likely Impacts and Effects of **ES Chapter 10: Human Health** (Doc Ref. 6.1) considers the outcomes of other technical chapters relevant to human health, including air quality and noise. Embedded mitigation with respect to human health is set out within Section 10.7 Embedded Mitigation of **ES Chapter 10: Human Health** (Doc Ref. 6.1). **ES Chapter 10: Human Health** (Doc Ref. 6.1) reports no significant adverse effects on human health following the application of mitigation measures and there is no reason to refuse consent or require specific mitigation in relation to health as per paragraph 4.4.7 of EN-1.
	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.	
4.6 Environmental and Biodiversity Net Gain		
Applicant Assessment	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.	A description of how the Scheme will take advantage of opportunities to enhance biodiversity within the Order Limits and potentially of the wider environment is provided in **ES Chapter 9: Ecology and Biodiversity** (Doc Ref 6.1). Further details are also provided within the **Outline LEMP** (Doc Ref. 7.16). A BNG Assessment using Defra's Statutory Biodiversity Metric has been completed and is available for review as part of the DCO Application within the **Biodiversity Net Gain Report** (Doc Ref. 7.9). It will be shared with the relevant authorities for discussion following submission of the DCO Application.
	4.6.7 In England applicants for onshore elements of any development are encouraged to use the latest version of the biodiversity metric to calculate their biodiversity baseline and present planned biodiversity net gain outcomes. This calculation data should be presented in full as part of their application	
	4.6.8 Where possible, this data should be shared, alongside a completed biodiversity metric calculation, with the Local Authority and Natural England and, where relevant, the EA, 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.	
	4.6.10 Biodiversity net gain should be applied after compliance with the mitigation hierarchy and does not change or replace existing environmental obligations.	A description of how the Scheme will take advantage of opportunities to enhance biodiversity within the Order Limits and potentially of the wider environment is provided in **ES Chapter 9: Ecology and Biodiversity** (Doc Ref 6.1). Further details are also provided within the **Outline LEMP** (Doc Ref. 7.16). Where relevant, reference is made to any national or local plans/strategies (as described in this appendix) to inform the plan for biodiversity enhancement within the Order Limits. A BNG Assessment using Defra's Statutory Biodiversity Metric is also included as part of the DCO Application within the **Biodiversity Net Gain Report** (Doc Ref. 7.9).
	4.6.11 Biodiversity net gain can be delivered onsite or wholly or partially off-site. We encourage details of any off-site delivery of biodiversity net gain to be set out within the application for development consent.	
	4.6.12 When delivering biodiversity net gain off-site, developments should do this in a manner that best contributes to the achievement of relevant wider strategic outcomes, for example by increasing habitat connectivity, enhancing other ecosystem service outcomes, or considering use of green infrastructure strategies. Reference should be made to relevant national or local plans and strategies, to	

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	inform off-site biodiversity net gain delivery. If published, the relevant strategy is the Local Nature Recovery Strategy (LNRS). If an LNRS has not been published, the relevant consenting body or planning authority may specify alternative plans, policies or strategies to use.	All BNG will be delivered on-site, with no off-site BNG proposed.
	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, water or soil quality, • climate adaptation, • landscape enhancement • increased access to natural greenspace, and/or • the enhancement, expansion or provision of trees and woodlands The scope of potential gains will be dependent on the type, scale, and location of specific projects. Applicants should look for a holistic approach to delivering wider environmental gains and benefits through the use of nature-based solutions and Green Infrastructure.	
	4.6.14 The Environment Act 2021 mandated the preparation of LNRSs across England. They are a new system of spatial strategies for nature recovery and will play a major role in providing detail on the best locations to create, enhance and restore nature and deliver wider environmental benefits. LNRSs will also agree priorities for nature recovery and map the most valuable existing areas for nature. They will be critical in delivering new government targets for species abundance and habitat creation commitments, as well as other pressing environmental outcomes for water and flood risk, carbon and tree planting and woodland creations. LNRSs will also drive the creation of a Nature Recovery Network (NRN), a major commitment in the government's Environmental Improvement Plan.	As set out in the **ES Chapter 9: Biodiversity and Ecology** (Doc Ref. 6.1), the extent of the Scheme provides the opportunity to deliver landscape scale nature conservation benefits that can positively contribute to the Local Nature Recovery Strategy (LNRS) being developed in Lincolnshire.
	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.	A description of how the Scheme will take advantage of opportunities to enhance biodiversity within the Order Limits and potentially of the wider environment is provided in **ES Chapter 9: Ecology and Biodiversity** (Doc Ref 6.1). Further details are also provided within the **Outline LEMP** (Doc Ref. 7.16). A BNG Assessment using Defra's Statutory Biodiversity Metric has been completed and is available for review as part of the DCO Application within the **Biodiversity Net Gain Report** (Doc Ref. 7.9).

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	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 Applicant recognises the importance of making use of available guidance and tools for measure natural capital. **ES Appendix 9-1: Ecology and Biodiversity Legislation, Policy and Guidance** (Doc Ref. 6.3) sets out the guidance considered to measure natural capital assets and ecosystem. It does not specifically refer to this example.
	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.	The Scheme has undergone an iterative design and site selection process in order to ensure that the Scheme makes the greatest possible contribution to renewable energy targets and the building of energy resiliency whilst also minimising environmental impacts by following the principles of good design. The Scheme has sought opportunities to provide beneficial outcomes including delivering BNG and contributing towards local conservation priorities. This includes providing new and enhanced contributions to the local green infrastructure network including extension hedgerow networks, field margins and ditches.
	4.6.18 Opportunities for environmental, social, and economic enhancements, protection and mitigation measures are identified in a number of sections in Part 5 of this NPS, which provides guidance on the impacts of new energy infrastructure.	
Secretary of State decision making	4.6.19 Although achieving biodiversity net gain is not currently an obligation on applicants, Schedule 15 to 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.	At the time of submitting this DCO Application, achieving biodiversity net gain is not yet a mandatory obligation for NSIPs. It is expected that the provisions within Schedule 15 of the Environment Act 2021 will come into force in May 2026. Regardless, the Applicant has secured a commitment within Schedule 2 of the **Draft DCO** (Doc Ref. 3.1) to deliver BNG in excess of 10%.
	4.6.20 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.	
	4.6.3 The Secretary of State should give appropriate weight to environmental and biodiversity net gain, although any weight given to gains provided to meet a legal requirement (for example under the Environment Act 2021) is likely to be limited.	
4.7 Criteria for good design for Energy infrastructure		
Applicant Assessment	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 Section 5 of the **Planning Statement** (Doc Ref. 7.1), good design has been a fundamental consideration from the outset of the Scheme. The **Design Approach Document** (Doc Ref. 7.3) demonstrates how the design of the Scheme has been developed in accordance with a clear design framework, based on the criteria for good design set out in EN-1. This has included the adoption of project level Design Principles, to guide decision making and embed good design outcomes to the Scheme.
	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	

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	landscape character, landform 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.	Design Principles have evolved throughout the design process, being informed and refined by stakeholder engagement, consultation feedback, technical studies and environmental assessments. They have been used to steer and influence the design of the Scheme to avoid and reduce adverse impacts wherever possible, make the most of the opportunities for enhancement and balance the need for flexibility and certainty within the DCO Application. Throughout the design process, the Applicant maintained an interdisciplinary approach to design and considered both the opportunities and constraints of the Scheme. This included analysis of existing physical, environmental, social and cultural context of the Site by a broad range of technical disciplines (including landscape and visual, noise, ecology and heritage) as set out and assessed by the topic-specific **ES Chapters** (Doc Ref. 6.1). This approach has enabled the Applicant to understand the complexities of the Site and identify where multiple opportunities and constraints have the potential to stack up with one another to provide a good design response and allow for co-existence and co-location with other terrestrial uses. For example, creating green infrastructure corridors that mitigate the visual impact of the Scheme and also provides biodiversity and recreational benefits to the local environment. As a result of the design approach adopted by the Applicant, the Scheme would deliver a number of environmental, social and economic benefits in addition to the generation of secure, low cost, decarbonised, clean, renewable energy. These include significant areas of new habitats that respect and enhance features within the landscape, delivering a Biodiversity Net Gain and improvements in ecological connectivity. The Scheme would also provide benefits for the local community via an enhanced green infrastructure network including a better-connected footpath and cycle network and access to open spaces and recreational spaces. The Scheme incorporates a permissive path proposed across the Order Limits, as secured in the **OLEMP** (Doc Ref. 7.16). The permissive path will be open for the operational phase of the Scheme and be open to equestrians, cyclists and pedestrians. A summary of the Scheme's benefits is provided within Section 4 of the **Planning Statement** (Doc Ref. 7.1). The **Design Approach Document** (Doc Ref. 7.3) is supported by the **Design Parameters** (Doc Ref. 7.4) which secures the design-related commitments to be adhered to post-consent in accordance with paragraph 4.7.5 of EN-1. If consent is given, these design outcomes will be secured and implemented post-consent, in accordance with the various management plans and design parameters secured by requirements to the **Draft DCO** (Doc Ref. 3.1). This approach also ensures the conclusions of the **ES** (Doc Ref. 6.1) are upheld, and the appropriate flexibility is provided.
	4.7.7 Applicants must demonstrate in their application documents how the design process was conducted and how the proposed design evolved. Where a number of different designs were considered, applicants should set out the reasons why the favoured choice has been selected.	
	4.7.8 Applicants should consider taking independent professional advice on the design aspects of a proposal. In particular, the Design 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 LPA.	
	4.7.9 Further advice on what applicants should demonstrate by way of good design is provided in the technology specific NPSs where relevant.	
Secretary of State decision making	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.	
	4.7.11 In doing so, the Secretary of State should be satisfied that the applicant has considered both functionality (including fitness for purpose and sustainability) and aesthetics (including its contribution to the quality of the area in which it would be located, any potential amenity benefits, and visual impacts on the landscape or seascape) as far as possible.	
	4.7.12 In considering applications, the Secretary of State should take into account the ultimate purpose of the infrastructure and bear in mind the operational, safety and security requirements which the design has to satisfy. Many of the wider impacts of a development, such as landscape and environmental impacts, will be important factors in the design process.	
	4.7.13 The Secretary of State should consider such impacts under the relevant policies in this NPS. Assessment of impacts must be for the stated design life of the scheme rather than a shorter time period.	
	4.7.14 The Secretary of State should consider taking independent professional advice on the design aspects of a proposal. In particular, the Design Council can be asked to provide design review for nationally significant infrastructure projects.	
	4.7.15 Further advice on what the Secretary of State should expect applicants to demonstrate by way of good design is provided in the technology specific NPSs where relevant.	

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4.10 Climate Change Adaptation and Resilience		
Applicant Assessment	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.	Section 7.8 of **ES Chapter 7: Climate Change** (Doc Ref. 6.1) and **ES Appendix 7-2: Climate Change Risk Register** (Doc Ref. 6.3) contain a climate change risk assessment, considering the impact of changing climate conditions on the Scheme. It also identifies the mitigation relevant to each climate change risk. Mitigation relevant to climate change risks have been embedded into the proposals of the Scheme, and impacts from the Scheme as a whole, including the embedded mitigation, have been assessed throughout the ES chapters. A Flood Risk Assessment is provided within **ES Appendix 11-3** (Doc Ref. 6.3).
	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.	This is noted but not considered relevant to the Scheme as it does not propose water storage infrastructure, with the exception of firewater.
	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.	As discussed in Section 7.4 of **ES Chapter 7: Climate Change** (Doc Ref. 6.1), an assessment of GHG impacts from land use change associated with the conversion of arable land to grassland has been omitted to present a worst-case assessment. Though land use change due to the Scheme is anticipated to have an overall net positive GHG impact, due to the higher carbon sequestration value of grassland in comparison to cropland, it is expected that the land will return to its original use upon decommissioning of the Scheme, with any carbon stored in soil or vegetation re-released to the atmosphere. The beneficial GHG impact from land use change is therefore considered to only be temporary (approximately 40 years) and has therefore been excluded from the lifecycle GHG impact assessment. Details with regards to biodiversity net gain are presented within the **Biodiversity Net Gain Report** (Doc Ref. 7.9) submitted with the DCO Application.
	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.	Section 7.8 of **ES Chapter 7: Climate Change** (Doc Ref. 6.1) and **ES Appendix 7-2: Climate Change Risk Register** (Doc Ref. 6.3) contain a climate change risk assessment, considering the impact of changing climate conditions on the Scheme. It also identifies the mitigation relevant to each climate change risk.
	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 7.8 of **ES Chapter 7: Climate Change** (Doc Ref. 6.1) and **ES Appendix 7-2: Climate Change Risk Register** (Doc Ref. 6.3) contain a climate change risk assessment, considering the impact of changing climate conditions on the Scheme. It also identifies the mitigation relevant to each climate change risk. A Flood Risk Assessment is provided within **ES Appendix 11-3** (Doc Ref. 6.3). **ES Appendix 11-1: Climate Change Legislation, Policy and Guidance** (Doc Ref. 6.3) describes the relevant guidance considered as part of the assessment which includes PAS 2080:2023 and ISEP guidance.

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	4.10.10 Applicants should assess the impacts on and from their proposed energy project across a range of climate change scenarios, in line with appropriate expert advice and guidance available at the time.	The climate change risk assessment presented in Section 7.8 of **ES Chapter 7: Climate Change** (Doc Ref. 6.1) considers the worst-case-scenario for climate change (RCP8.5) up to 2079. **ES Appendix 11-1: Climate Change Legislation, Policy and Guidance** (Doc Ref. 6.3) describes the relevant guidance considered as part of the assessment which includes PAS 2080:2023 and ISEP guidance.
	4.10.11 Applicants should demonstrate that proposals have a high level of climate resilience built-in from the outset and should also demonstrate how proposals can be adapted over their predicted lifetimes to remain resilient to a credible maximum climate change scenario. These results should be considered alongside relevant research which is based on the climate change projections.	Section 7.7 of **ES Chapter 7: Climate Change** (Doc Ref. 6.1) presents a summary of built in climate resilience measures, including those with regards to flood risk. Further information is also presented within **ES Appendix 11-3: Flood Risk Assessment** (Doc Ref. 6.3).
	4.10.12 Where energy infrastructure has safety critical elements, the applicant should apply a credible maximum climate change scenario. It is appropriate to take a risk-averse approach with elements of infrastructure which are critical to the safety of its operation.	Section 7.7 of **ES Chapter 7: Climate Change** (Doc Ref. 6.1) presents a summary of built in climate resilience measures, including those with regards to flood risk. Safety critical elements of the Scheme (such as On-Site Substation and BESS Compounds, Solar Stations and Cable Sealing End Compounds) have been designed to be resilient to flooding. Further information is also presented within **ES Appendix 11-3: Flood Risk Assessment** (Doc Ref. 6.3).
Secretary of State decision making	4.10.13 The Secretary of State should be satisfied that applicants for new energy infrastructure have taken into account the potential impacts of climate change using the latest UK Climate Projections and associated research and expert guidance (such as the EA's Climate Change Allowances for Flood Risk Assessments or the Welsh Government's Climate change allowances and flood consequence assessments) available at the time the ES was prepared to ensure they have identified appropriate mitigation or adaptation measures. This should cover the estimated lifetime of the new infrastructure, including any decommissioning period.	Section 7.4 of **ES Chapter 7: Climate Change** (Doc Ref. 6.1) details the information and datasets used to undertake the climate risk assessment. Section 7.8 of **ES Chapter 7: Climate Change** (Doc Ref. 6.1) and **ES Appendix 7-2: Climate Change Risk Register** contain a climate change risk assessment, considering the impact of changing climate conditions on the Scheme up to 2079, which covers the expected decommissioning period. Further information is also presented within **ES Appendix 11-3: Flood Risk Assessment** (Doc Ref. 6.3).
	4.10.15 The Secretary of State should be satisfied that there are not features of the design of new energy infrastructure critical to its operation which may be seriously affected by more radical changes to the climate beyond that projected in the latest set of UK climate projections, taking account of the latest credible scientific evidence on, for example, sea level rise (for example by referring to additional maximum credible scenarios – i.e. from the Intergovernmental Panel on Climate Change or EA) and that necessary action can be taken to ensure the operation of the infrastructure over its estimated lifetime.	Section 7.8 of **ES Chapter 7: Climate Change** (Doc Ref. 6.1) and **ES Appendix 7-2: Climate Change Risk Register** contain a climate change risk assessment, considering the impact of changing climate conditions on the Scheme. Safety critical elements of the Scheme (such as On-Site Substation and BESS Compounds, Solar Stations and Cable Sealing End Compounds) have been designed to be resilient to flooding. Further information is also presented within **ES Appendix 11-3: Flood Risk Assessment** (Doc Ref. 6.3).
	4.10.16 If any adaptation measures give rise to consequential impacts (for example on flooding, water resources or coastal change) the Secretary of State should consider the impact of the latter in relation to the application as a whole and the impacts guidance set out in Part 5 of this NPS.	Section 7.8 of **ES Chapter 7: Climate Change** (Doc Ref. 6.1) and **ES Appendix 7-2: Climate Change Risk Register** (Doc Ref. 6.3) contain a climate change risk assessment, considering the impact of changing climate conditions on the Scheme. It also identifies the mitigation relevant to each climate change risk. Mitigation relevant to climate change risks have been embedded into the proposals of the Scheme, and impacts from the Scheme as a whole, including the embedded mitigation, have been assessed throughout the ES chapters. A Flood Risk Assessment is provided within **ES Appendix 11-3** (Doc Ref. 6.3).

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	4.10.17 Any adaptation measures should be based on the latest set of UK Climate Projections, the government's latest UK Climate Change Risk Assessment, when available, and in consultation with the EA's Climate Change Allowances for Flood Risk Assessments or the Welsh Government's Climate change allowances and flood consequence assessments	As set out in Section 7.4 of **ES Chapter 7: Climate Change** (Doc Ref. 6.1), the future baseline assessment has been based on the UK Climate Projections 2018 (UKCP18) data for the Site. Further information on flood risk is presented within **ES Appendix 11-3: Flood Risk Assessment** (Doc Ref. 6.3).
	4.10.18 The Secretary of State may take into account reporting authorities' reports (see paragraph 4.10.3 above) to the Secretary of State when considering adaptation measures proposed by an applicant for new energy infrastructure.	Noted.
	4.10.19 Adaptation measures should be required to be implemented at the time of construction where necessary and appropriate to do so. However, where they are necessary to deal with the impact of climate change, and that measure would have an adverse effect on other aspects of the project and/or surrounding environment (for example coastal processes), the Secretary of State may consider requiring the applicant to keep the need for the adaptation measure under review, and ensure that the measure could be implemented should the need arise, rather than at the outset of the development (for example increasing height of existing, or requiring new, sea walls)	Noted. No adaptation measures have been identified as necessary to deal with the impact of climate change.
4.11 Network Connection		
Applicant Assessment	4.11.5 The applicant must liaise with National Grid who own and manage the transmission network in England and Wales or the relevant regional DNO or TSO to secure a grid connection.	The Applicant has submitted a **Grid Connection Statement** (Doc Ref. 7.5) which provides details of how the Scheme will be connected to the NETS. The Applicant initially received a grid connection offer in November 2022 which confirmed a connection would be facilitated by a spare bay within the design of the planned Weston Marsh 400kV Substation. The offer stipulated a 750MW export and 350MW import BESS capacity with a connection date of 2033. As part of the Connections Reform process by NESO, the Applicant's offer was varied to a Gate 1 offer. This initially indicates a connection date post 2035 (as Gate 2 offers were made up to the period ending 2035). However, an earlier connection may be possible within the 2031 to 2035 window should the Applicant be successful in reapplying through future Gate 2 application rounds. For the avoidance of doubt, the Applicant intends to submit a Gate 2 application at the earliest possibility. The exact dates for future application rounds will be confirmed by NESO once there is greater clarity on the available connection capacity of the relevant grid infrastructure beyond 2030. In the interim, the Applicant is continuing to engage with National Grid Electricity Transmission (NGET) to ensure the Scheme is designed to align with the new grid infrastructure planned at Weston Marsh.

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	4.11.6 Applicants may wish to take a commercial risk where they have not received or accepted a formal offer of a grid connection from the relevant network operator at the time of the application. In this situation applicants should provide information as part of their application confirming that there is no obvious reason why a network connection would not be possible.	While the Applicant has not yet received a final formal (Gate 2) offer under the Connections Reform process, the Applicant has set out within the **Grid Connection Statement** (Doc Ref. 7.5) that there is no clear reason why a network connection (Gate 2 offer) could not be granted by NESO on the basis that: • There has been no formal change by NGET to the completion date for the Grimsby to Walpole project which would provide the Point of Connection (the new Weston Marsh Substations) and the capacity for transmission from the Scheme. The date for completion of the Grimsby to Walpole project and associated substations is 2033. This provides confidence that the necessary grid infrastructure capacity will be available for the Scheme. • Continued journey through the planning process further demonstrates readiness in support of future applications. • NESO have indicated there will be further opportunities to reapply, as spare capacity is confirmed either due to grid infrastructure upgrades (like those under Grimsby to Walpole) or project attrition (i.e. projects with Gate 2 status confirming they are no longer proceeding to construction and operation). This accords with the requirements of paragraph 4.11.6 of EN-1, which also allows for applicants to take a commercial risk where they have not received or accepted a formal offer of a grid connection at the time of application.
	4.11.7 The Planning Act 2008 aims to create a holistic planning regime so that the cumulative effect of different elements of the same project can be considered together. Co-ordinated applications typically bring economic efficiencies and reduced environmental impact. The government therefore envisages that wherever reasonably possible, applications for new generating stations and related infrastructure should be contained in a single application to the Secretary of State or in separate applications submitted in tandem which have been prepared in an integrated way, as outlined in EN-5. This is particularly encouraged to ensure development of more co-ordinated transmission overall.	The DCO Application includes the Grid Connection Route within its scope. The **ES** (Doc Ref. 6.1) considers the environmental effects of the Scheme as a whole.
	4.11.8 On some occasions it may not be possible to coordinate applications. For example, different elements of a project may have different lead-in times and be undertaken by different legal entities subject to different commercial and regulatory frameworks (for example grid companies operate within OFGEM controls) making it inefficient from a delivery perspective to submit one application. Applicants may therefore decide to submit separate applications for each element. Where this is the case, the applicant should include information on the other elements and explain the reasons for the separate application confirming that there are no obvious reasons for why other elements are likely to be refused.	

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	4.11.9 If this option is pursued, the applicant accepts the implicit risks involved in doing so and must ensure they provide sufficient information to comply with the EIA Regulations including the indirect, secondary, and cumulative effects, which will encompass information on grid connections.	
	4.11.10 It is recognised that this may be the situation for some new offshore transmission projects, where applications for consent may be brought forward separate to (though planned with) the applications for associated wind farms as outlined in EN-3 and EN-5.	
Secretary of State decision making	4.11.11 The Secretary of State should consider guidance contained within EN3 and EN-5.	The **Grid Connection Statement** (Doc Ref. 7.5) outlines the network connection arrangements proposed for the Scheme. There are no linked applications proposed, and it is not considered that a decision on this Scheme would impact the Secretary of State's decision making on any other projects.
	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.	
	4.11.13 Where the Secretary of State has decided to grant consent for one project this should not in any way fetter the Secretary of State's ability to take subsequent decisions on any related projects.	
4.12 Pollution control and other environmental regulatory regimes		
Applicant Assessment	4.12.5 Applicants should consult the MMO (or NRW in Wales) on energy NSIP projects which would affect, or would be likely to affect, any relevant marine areas as defined in the Planning Act 2008 (as amended by section 23 of the Marine and Coastal Access Act 2009). Applicants are encouraged to consider the relevant marine plans in advance of consulting the MMO for England or the relevant policy teams at the Welsh government.	N/A - The Scheme is unlikely to affect any of the areas outlined in Section 42(2) of the PA 2008.
	4.12.6 Many projects covered by this NPS will be subject to the Environmental Permitting Regulations, which also incorporates operational waste management requirements for certain activities. When an applicant applies for an Environmental Permit, the relevant regulator (usually the EA or NRW but sometimes the local authority) requires that the application demonstrates that processes are in place to meet all relevant Environmental Permitting Regulations requirements.	The **Schedule of Other Consents and Licences** (Doc Ref. 3.3) provides detail of the other consents, licences and permits likely to be required to undertake the Scheme which are not incorporated into the **Draft DCO** (Doc Ref. 3.1). Engagement has occurred with the relevant regulators in respect of any permitting requirements. Measures related to pollution control are set out within the relevant management plans; i.e. the **Outline CEMP** (Doc Ref. 7.10), **Outline DEMP** (Doc Ref. 7.11) and **Outline DEMP** (Doc Ref. 7.12).
	4.12.7 Applicants should understand what non-planning permits / consents the development will require and consider the timings for gaining these permissions alongside the timing for gaining the DCO. They should make early contact with relevant regulators, including EA or NRW and the MMO, to discuss their requirements for Environmental Permits and other consents, such as marine licences. Applicants can access enhanced (paid for) pre-application support before applying for an environmental permit. Enhanced pre-application advice is recommended for complex or significant developments to ensure applications contain the necessary assessments to address the risks associated with the proposed activity. Applicants can also explore options, such as submitting their application in stages through this route if the application is complex or uses novel	

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	technologies. Early engagement on the permissions required for the development is strongly advised and helps the management of these within the timescale for development. This is particularly advisable in circumstances where applicants have a number of permissions to obtain from the EA for their development.	
	4.12.8 Wherever appropriate, applicants should submit applications for Environmental Permits and other necessary consents at the same time as applying to the Secretary of State for development consent.	
Secretary of State decision making	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.	**ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1) outlines pollution controls for the construction and operation phases of the Scheme. Measures related to pollution control are set out within the relevant management plans; i.e. the **Outline CEMP** (Doc Ref. 7.10), **Outline DEMP** (Doc Ref. 7.11) and **Outline DEMP** (Doc Ref. 7.12).
	4.12.10 The Secretary of State should work on the assumption that the relevant pollution control regime and other environmental regulatory regimes, including those on land drainage, water abstraction and biodiversity, will be properly applied and enforced by the relevant regulator. The Secretary of State should act to complement but not seek to duplicate those regulatory regimes, but without prejudice to the Secretary of State's duty to 'secure' compliance with the relevant regulatory requirements.	
	4.12.11 The Secretary of State's consent may include a deemed marine licence and the MMO, or NRW, will advise on what conditions should apply to the deemed marine licence.	N/A – The Scheme will not require a deemed marine licence.
	4.12.12 The Secretary of State and the MMO, or NRW, should cooperate closely to ensure that energy NSIPs are licensed in accordance with environmental legislation.	N/A – The Scheme will not require a deemed marine licence.
	4.12.13 In considering the impacts of the project, the Secretary of State may wish to consult the regulator on matters relevant to the grant of, or conditions which would otherwise be included in, an environmental permit. The Secretary of State should be satisfied that development consent can be granted taking full account of environmental impacts.	The Applicant has engaged with the relevant regulators during the pre-application stage. The **Schedule of Other Consents and Licences** (Doc Ref. 3.3) sets out the nature of the additional consents and licences likely to be required for the Scheme. It includes a summary of progress made by the Applicant to obtain those additional consents and engagement with the relevant regulator (noting they do not need to be sought in parallel to the DCO). A summary of engagement is also contained within **ES Chapter** (Doc Ref. 6.1) with Statements of Common Ground being progressed with regulators which will be updated throughout the course of the examination.
	4.12.14 Working in close cooperation with the EA or NRW and/or the pollution control authority, and other relevant bodies, such as the MMO, the SNCB, Drainage Boards, and water and sewerage undertakers, the Secretary of State should be satisfied, before consenting any potentially polluting developments, that: • the relevant pollution control authority is satisfied that potential releases can be adequately regulated under the pollution control framework • the effects of existing sources of pollution in and around the site are not such that the cumulative effects of pollution when the proposed development is added would make that development unacceptable, particularly in relation to statutory environmental quality limits	

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	4.12.15 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. On this basis, it is reasonable for the Secretary of State to consider residual amenity issues only when considering whether the development itself is an acceptable use of the land or sea, and on the impacts of that use	
4.13 Safety		
Applicant Assessment	4.13.5 Applicants should consult with the HSE on matters relating to safety.	The HSE have been formally consulted by the Planning Inspectorate as part of the preparation of the Scoping Opinion (**ES Appendix 1.2: EIA Scoping Opinion** (Doc Ref. 6.3)). As a prescribed consultation body, the HSE was also consulted during statutory and targeted consultation (refer to **Consultation Report** (Doc Ref. 5.1)). A summary of the relevant comments in relation to major accidents and disasters is provided within **ES Chapter 16: Other Environmental Topics, Section 16.5: Major Accidents and Disasters** (Doc Ref. 6.1).
	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.
	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 DCO Application is accompanied by an **Outline Battery Safety Management Plan** (Doc Ref. 7.18) which sets out the key fire safety provisions for the BESS including measures to reduce fire risk and fire protection measures. The Applicant has consulted with Lincolnshire Fire and Rescue Service on the contents of this management plan.
Secretary of State decision making	4.13.8 The Secretary of State should be satisfied that a safety assessment has been prepared, where required, and that the Competent Authority has raised no safety objections.	
4.14 Hazardous Substances		
Applicant assessment	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 Scheme will not hold stock of hazardous substances which would require the obtaining of a 'Hazardous Substances Consent' and so the HAS and HSE have not been consulted on these matters. The **Consultation Report** (Doc Ref. 5.1) confirms, however, that the HSE has been consulted under Section 42 of the PA 2008.
	4.14.6 HSE sets a consultation distance around every site with hazardous substances consent and notifies the relevant LPAs. The applicant should therefore consult the LPA at pre-application stage to identify whether its proposed site is within the consultation distance of any site with hazardous substances consent and, if so, should consult the HSE for its advice on locating the particular development on that site. Where a hazardous substance consent has been deemed to be granted, the developer is required to send the relevant HSA any information required by them for the purposes of a register.	
Secretary of State decision making	4.14.7 Where hazardous substances consent is applied for, the Secretary of State will consider whether to make an order directing that hazardous substances	This paragraph is not relevant to the assessment of the Scheme as the Scheme does require a 'Hazardous Substances Consent'.

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	consent shall be deemed to be granted alongside making an order granting development consent. The Secretary of State should consult HSE about this.	
4.15 Common Law Nuisance and Statutory Nuisance		
Applicant Assessment	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).	The **Statutory Nuisance Statement** (Doc Ref. 7.6) identifies potential sources of statutory nuisance under section 79(1) of the Environmental Protection Act 1990 and sets out the embedded mitigation measures proposed. On this basis, it is not expected that the construction, operation (and maintenance) or decommissioning of the Scheme would give rise to a statutory nuisance. As such, the Applicant considers that sufficient assessment and mitigation measures are in place to enable the SoS to conclude that the no statutory nuisances would arise from the Scheme's construction, operation and maintenance and decommissioning, in accordance with paragraphs 4.15.5 and 4.15.6. Notwithstanding this conclusion, Article 8 of the **Draft DCO** (Doc Ref. 3.1) makes specific provision in relation to proceedings under section 82 of the Environmental Protection Act 1990. Article 8 limits the availability of the statutory authority defence to circumstances where any noise nuisance is an unavoidable consequence of the authorised development and cannot reasonably be avoided, thereby reflecting the approach anticipated by paragraph 4.15.7 of the policy and section 158(3) of the PA 2008.
Secretary of State decision making	4.15.6 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 (see Section 5.7 on dust, odour, artificial light etc. and Section 5.12 on noise and vibration).	
	4.15.7 The Secretary of State should note that the defence of statutory authority is subject to any contrary provision made by the Secretary of State in any particular case in a Development Consent Order (section 158(3) of the Planning Act 2008). Therefore, subject to Section 5.7 and Section 5.12, the Secretary of State can disapply the defence of statutory authority, in whole or in part, in any particular case, but in so doing should have regard to whether any particular nuisance is an inevitable consequence of the development.	
4.16 Security Considerations		
Applicant Assessment	4.16.6 Where national security implications have been identified, the applicant should consult with relevant security experts from NPSA, ONR (for civil nuclear) and/or 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.	N/A – No national security implications have been identified. Security measures for the Scheme are embedded into the design of the proposals from the outset and are considered proportionate. Fencing and CCTV would be provided across the Scheme to secure and monitor the solar infrastructure as secured by the **Design Parameters** (Doc Ref. 7.4). The impacts of such are considered and assessed within **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1).
	4.16.7 The applicant should only include sufficient information in the application as is necessary to enable the Secretary of State to examine the development consent issues and make a properly informed decision on the application.	
Secretary of State decision making	4.16.8 If NPSA, ONR (for civil nuclear) and/or DESNZ are satisfied that security issues have been adequately addressed in the project when the application is submitted to the Secretary of State, it will provide confirmation of this to the Secretary of State. The Secretary of State should not need to give any further consideration to the details of the security measures in its examination.	
	4.16.9 In exceptional cases, where examination of an application would involve public disclosure of information about defence or national security which would not be in the national interest, the examination of that evidence may take place in a closed session as set out under Examination Procedure Rules.	

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	4.16.10 The Secretary of State must also consider duties under other legislation including duties under the Environment Act 2021 in relation to environmental targets and the Government's Environmental Improvement Plan.	
EN-1 Part 5 – Generic Impacts		
5.2 Air Quality and Emissions		
Applicant Assessment	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 Chapter 6: Air Quality** (Doc Ref. 6.1) of the ES assesses the likely significant effects of the Scheme on local air quality. The assessment provides an overview of the existing baseline conditions for the study area, followed by an assessment of likely significant effects arising from the construction, operation (including maintenance), and decommissioning stages of the Scheme on air quality.
	5.2.9 The ES should describe: • existing air quality concentrations and the relative change in air quality from existing levels; • any significant air quality effects, mitigation action taken and any residual effects, distinguishing between the project stages and taking account of any significant emissions from any road traffic generated by the project; • the predicted absolute emissions, concentration change and absolute concentrations as a result of the methods have been applied; and • any potential eutrophication impacts.	Section 6.5 of **ES Chapter 6: Air Quality** (Doc Ref 6.1) presents the baseline air quality characteristics and the relative change in air quality from existing levels, and a Dust Risk Assessment (DRA) considering human and ecological receptors. Construction phase road traffic volumes do not meet the threshold above which detailed air quality modelling is required. **ES Chapter 6: Air Quality** (Doc Ref. 6.1) provides an assessment of the air quality impacts and potential for likely significant effects due to the construction, operation (including maintenance) and decommissioning stages of the Scheme, including those associated with road traffic exhaust emissions. Mitigation measures are documented within and secured by the **Outline CEMP** (Doc Ref. 7.10), the **Outline OEMP** (Doc Ref. 7.11), the **Outline DEMP** (Doc Ref. 7.12), the **Outline CTMP** (Doc Ref. 7.13).
	5.2.10 In addition, applicants should consider the Environment Targets (Fine Particulate Matter) (England) Regulations 2023 and associated Defra guidance.	A qualitative assessment of the likely significant effects of construction and decommissioning phase dust and particulate matter at sensitive receptors have been undertaken. The Environment Targets (Fine Particulate Matter) (England) Regulations 2023 have been considered in Section 6.7 of **ES Chapter 6: Air Quality** (Doc Ref. 6.1). Mitigation measures are documents and secured by the **Outline CEMP** (Doc Ref 7.10), the **Outline DEMP** (Doc Ref. 7.12) and the **Outline CTMP** (Doc Ref. 7.13).
	5.2.11 Defra publishes future national projections of air quality based on estimates of future levels of emissions, traffic, and vehicle fleet. Projections are updated as the evidence base changes and the applicant should ensure these are current at the point of an application. The applicant's assessment should be consistent with this but may include more detailed modelling and evaluation to demonstrate local and national impacts. If an applicant believes they have robust additional supporting evidence, to the extent they could affect the conclusions of the assessment, they should include this in their representations to the Examining Authority along with the source.	In 2023, the Environmental Improvement Plan (EIP) outlined updates to the PM2.5 Air Quality Objective for future years. These are long-term target of 10 µg/m3 by 2040 and an interim target of 12 µg/m3 by 2028. Section 6.7 of **ES Chapter 6: Air Quality** (Doc Ref. 6.1) does not anticipate there to be any significant changes to air quality as a result of the Scheme.

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	5.2.12 Where a proposed development is likely to lead to a breach of any relevant statutory air quality limits, objectives or targets, or affect the ability of a non-compliant area to achieve compliance within the timescales set out in the most recent relevant air quality plan/strategy at the time of the decision, the applicant should work with the relevant authorities to secure appropriate mitigation measures to ensure that those statutory limits, objectives or targets are not breached.	Section 6.7 of **ES Chapter 6: Air Quality** (Doc Ref. 6.1) does not anticipate there to be any significant changes to air quality as a result of the Scheme.
	5.2.13 The Secretary of State should consider whether mitigation measures are needed both for operational and construction emissions over and above any which may form part of the project application. A construction management plan may help codify mitigation at this stage. In doing so the Secretary of State should have 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	**ES Chapter 6: Air Quality** (Doc Ref 6.1) conducts a qualitative assessment of the likely significant effects of construction and decommissioning phase dust and particulate matter at sensitive receptors have been undertaken following the Defra Local Air Quality Management Technical Guidance and PM2.5 Target Guidance. The assessment concludes that there are no anticipated significant residual effects on air quality as a result of the Scheme. Section 6.6 of **ES Chapter 6: Air Quality** (Doc Ref. 6.1) presents embedded mitigation measures for the Scheme in relation to Air Quality. Mitigation measures following IAQM guidance are also presented in the **Outline CEMP** (Doc Ref. 7.10), the **Outline DEMP** (Doc Ref. 7.12) and the **Outline CTMP** (Doc Ref. 7.13).
	5.2.14 The mitigations identified in Section 5.14 on traffic and transport impacts will help mitigate the effects of air emissions from transport.	When the Scheme is operational, activities will be limited to maintenance and the associated transport to the infrastructure elements of the Scheme. As planned maintenance will be minimal and would comprise limited planned site visits, the effects associated with operational road traffic exhaust emissions are considered to be not significant in terms of EIA Regulations. Any effects on air quality from traffic during the construction and decommissioning of the Scheme will be temporary (i.e. during the construction/decommissioning period only) and can be suitably controlled by the employment of mitigation measures. These measures are documented within the **Outline CTMP** (Doc Ref. 7.13) which has been prepared and is submitted in support of the DCO Application.
Secretary of State decision making	4.2.15 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.	Air Quality impacts on human health receptors during the constructure phase have been assessed in full and are detailed within **ES Chapter 6: Air Quality** (Doc Ref. 6.1). This assesses potential significant effects from the Scheme during the construction phase on human receptors. Any effects on air quality and human receptors during the construction of the Scheme can be suitably controlled by the mitigation measures listed within the **Outline CEMP** (Doc Ref 7.10) and **Outline CTMP** (Doc Ref. 7.13).
	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	Section 6.7 of **ES Chapter 6: Air Quality** (Doc Ref. 6.1) concludes that there are no anticipated significant residual effects on air quality as a result of the Scheme.

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	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.	Mitigation measures following IAQM guidance are presented in the **Outline CEMP** (Doc Ref. 7.11), the **Outline DEMP** (Doc Ref. 7.12), the **Outline OEMP** (Doc Ref. 7.11) and the **Outline CTMP** (Doc Ref. 7.13).
	5.2.17 The Secretary of State should give air quality considerations substantial weight where a project is proposed near a sensitive receptor site, such as an education or healthcare facility, residential use or a sensitive or protected habitat.	Section 6.7 of **ES Chapter 6: Air Quality** (Doc Ref. 6.1) concludes that the construction, operation and decommissioning of the Scheme will not have a significant effect on air quality, including any sensitive receptors.
	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.	Sensitive receptors within the study area are listed in Section 6.6 of **ES Chapter 6: Air Quality** (Doc Ref. 6.1). Section 6.7 concludes that there are no anticipated significant residual effects on air quality as a result of the Scheme. Mitigation measures following IAQM guidance are presented in the **Outline CEMP** (Doc Ref. 7.11), the **Outline DEMP** (Doc Ref. 7.12), the **Outline OEMP** (Doc Ref. 7.11) and the **Outline CTMP** (Doc Ref. 7.13).
	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.	Section 6.7 of **ES Chapter 6: Air Quality** (Doc Ref. 6.1), there are not anticipated to be any significant changes to air quality as a result of the Scheme. The Scheme would not lead to non-compliance with a statutory limit, objective or target
5.3 Greenhouse Gas Emissions		
Applicant Assessment	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 BAT for that type of technology. • Calculation of operational energy consumption and associated carbon emissions. • Whether and how any residual GHG emissions will be (voluntarily) offset or removed using a recognised framework. • Where there are residual emissions, the level of emissions and the impact of those on national and international efforts to limit climate change, both alone and where relevant in combination with other developments at a	Section 7.8 of **ES Chapter 7: Climate Change** (Doc Ref. 6.1) presents a whole-life carbon assessment, including an assessment of residual emissions against UK carbon budgets and sectoral targets. As discussed above and in Section 7.4 of **ES Chapter 7: Climate Change** (Doc Ref. 6.1)., an assessment of GHG impacts from land use change associated with the conversion of arable land to grassland has been omitted to present a worst-case assessment. Measures embedded within the Scheme to reduce GHG impacts are summarised within Section 7.7 of **ES Chapter 7: Climate Change** (Doc Ref. 6.1). No residual GHG emissions require offsetting or removal using a recognised framework.

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	regional or national level, or sector level, if sectoral targets are developed.	
Migration	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.	Measures embedded within the Scheme to reduce GHG impacts are summarised within Section 7.7 of **ES Chapter 7: Climate Change** (Doc Ref. 6.1).
	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	Measures embedded within the Scheme to reduce GHG impacts are summarised within Section 7.7 of **ES Chapter 7: Climate Change** (Doc Ref. 6.1).
	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.	Measures embedded within the Scheme to reduce GHG impacts are summarised within Section 7.7 of **ES Chapter 7: Climate Change** (Doc Ref. 6.1). Measures relating to reducing GHG impacts are to be secured through environmental management plans, such as the **Outline Construction Environmental Management Plan (OCEMP)** (Doc Ref 7.10), **Outline Operational Environmental Management Plan (OOEMP)** (Doc Ref. 7.11), **Outline Decommissioning Environmental Management Plan (ODEMP)** (Doc Ref 7.12) and **Outline Construction Traffic Management Plan (OCTMP)** (Doc Ref. 7.13).
Secretary of State decision making	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.	Section 7.8 of **ES Chapter 7: Climate Change** (Doc Ref. 6.1) presents a whole-life carbon assessment for all stages of the Scheme. The Applicant's lifecycle greenhouse gas assessment concludes that the carbon intensity of the Scheme would represent an 87% saving against the baseline currently UK grid carbon intensity. The current grid mix includes heavy fossil fuel generation types. Therefore, greenhouse gas emissions during the construction, operation and decommissioning of the Scheme are considered to be 'offset' by the net positive impact of the Scheme on greenhouse gas emissions and the UK's ability to meet its carbon targets.
	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.	Measures embedded within the Scheme to reduce GHG impacts are summarised within Section 7.7 of **ES Chapter 7: Climate Change** (Doc Ref. 6.1).
	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.	Measures embedded within the Scheme to reduce GHG impacts are summarised within Section 7.7 of **ES Chapter 7: Climate Change** (Doc Ref. 6.1). Greenhouse gas emissions during the construction, operation and decommissioning of the Scheme are considered to be 'offset' by the net positive impact of the Scheme on greenhouse gas emissions and the UK's ability to meet its carbon targets.
	5.3.11 Operational GHG emissions are a significant adverse impact from some types of energy infrastructure which cannot be totally avoided (even with full deployment of CCS technology). Given the characteristics of these and other technologies, as noted in Part 3 of this NPS, and the range of non-planning policies	Section 7.8 of **ES Chapter 7: Climate Change** (Doc Ref. 6.1) presents a whole-life carbon assessment for all stages of the Scheme. Measures embedded within the Scheme to reduce GHG impacts are summarised within Section 7.7 of **ES Chapter 7: Climate Change** (Doc Ref. 6.1).

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	that can be used to decarbonise electricity generation, such as the UK ETS (see Section 2.4), government has determined 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 (e.g. the CCR requirements). Any carbon assessment will include an assessment of operational GHG emissions, but the policies set out in Part 2, including the UK ETS, can be applied to these emissions.	
	5.3.12 Operational emissions will be addressed in a managed, economy-wide manner, to ensure consistency with carbon budgets, net zero and our international climate commitments. The Secretary of State does not, therefore need to assess individual applications for planning consent against operational carbon emissions and their contribution to carbon budgets, net zero and our international climate commitments.	The Scheme will provide electricity to the national grid that may otherwise by generated by processes with higher carbon intensities, and the benefit of the Scheme, with regard to climate, is to replace the electricity generation from fossil fuels. The Scheme has very low emissions relative to the sectoral carbon budget totals, and while the Scheme will result in residual emissions post 2050, as with the UK carbon budgets, it will achieve substantial emissions reductions relative to the without-project baseline. The Applicant concludes the Scheme would have a significant beneficial impact on the climate.
5.4 Biodiversity and Geological Conservation		
Applicant Assessment	5.4.18 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 and Wales), on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats.	Section 9.8 of **ES Chapter 9: Ecology and Biodiversity** (Doc Ref 6.1) sets out the likely effects on designated sites of ecological importance, protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity.
	5.4.20 The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests.	A description of how the Scheme will take advantage of opportunities to enhance biodiversity within the Order Limits and potentially of the wider environment is provided in **ES Chapter 9: Ecology and Biodiversity** (Doc Ref 6.1). Further details are also provided within the **Outline LEMP** (Doc Ref. 7.16). A BNG Assessment using Defra's Statutory Biodiversity Metric is included as part of the DCO Application within the **Biodiversity Net Gain Report** (Doc Ref. 7.9).
	5.4.21 Applicants should consider wider ecosystem services and benefits of natural capital when designing enhancement measures.	
	5.4.22 As set out in Section 4.7, the design process should embed opportunities for nature inclusive design. Energy infrastructure projects have the potential to deliver significant benefits and enhancements beyond Biodiversity Net Gain, which result in wider environmental gains (see Section 4.6 on Environmental and Biodiversity Net Gain). The scope of potential gains will be dependent on the type, scale, and location of each project.	Mitigation measures have been embedded in the Scheme design with the aim of enabling the continued movement of species, including birds, fish, aquatic and terrestrial mammals detailed. A description of how the Scheme will take advantage of opportunities to enhance biodiversity within the Order Limits and potentially of the wider environment is provided in **ES Chapter 9: Ecology and Biodiversity** (Doc Ref 6.1). Further details are also provided within the **Outline LEMP** (Doc Ref. 7.16). A BNG Assessment using Defra's Statutory Biodiversity Metric is included as part of the DCO Application within the **Biodiversity Net Gain Report** (Doc Ref. 7.9).
	5.4.23 The design of energy NSIP proposals will need to consider the movement of mobile/migratory species such as birds, fish and marine and terrestrial mammals and their potential to interact with infrastructure. As energy infrastructure could	

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	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. Applicants should consider relevant plan policies in marine plans in England.	
Applicant Assessment – habitats regulations	5.4.26 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 is required. Applicants can request and agree 'Evidence Plans' with SNCBs, which is a way to record upfront the information the applicant needs to supply with its application, so that the HRA can be efficiently carried out. If an AA is required, the applicant must provide the Secretary of State with such information as may reasonably be required to enable the Secretary of State to conduct the AA. This should include information on any mitigation measures that are proposed to minimise or avoid likely significant effects.	The Applicant has sought and taken into account the advice of the appropriate Statutory Nature Conservation Body (Natural England) throughout the preparation of the Habitats Regulations Assessment. **ES Appendix 9-14: Habitats Regulations Assessment Report** (Doc Ref 6.3) has been prepared to provide the required information for the Secretary of State to determine whether an Appropriate Assessment is required under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 and, where necessary, to undertake that assessment. The Report considers the effects of the Scheme on European sites, both alone and in combination with other plans and projects, in view of their Conservation Objectives, and includes details of the mitigation measures proposed to avoid or minimise potential effects. Taking account of this mitigation, the Report concludes that the Scheme would not give rise to likely significant residual effects on the European sites included in the assessment. Regular engagement with Natural England has informed the scope and conclusions of the assessment, ensuring that the information provided is sufficient to enable the Secretary of State to carry out the Habitats Regulations Assessment efficiently.
	5.4.27 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	**ES Appendix 9-14: Habitats Regulations Assessment Report** (Doc Ref 6.3) does not report any significant adverse effects on the integrity of habitat sites; therefore the Applicant is not required to provide a derogation.
	5.4.28 If the SNCB gives such an indication at a later stage in the development consent process, the applicant must provide this information as soon as is reasonably possible and before the close of the examination. This information must include assessment of alternative solutions, a case for IROPI and appropriate environmental compensation.	Should Natural England later conclude that adverse effects on the integrity of European Site(s) cannot be avoided or mitigated, appropriate information will be provided to confirm that the Scheme meets the three derogation tests (No Reasonable Alternatives, Imperative Reasons of Overriding Public Interest and adequate compensation).
	5.4.29 Provision of such information will not be taken as an acceptance of adverse impacts and if an applicant disputes the likelihood of adverse impacts, it can provide this information as part of its application 'without prejudice' to the Secretary of State's final decision on the impacts of the potential development. If, in these circumstances, an applicant does not supply information required for the assessment of a potential derogation, there will be no expectation that the	

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	Secretary of State will allow the applicant the opportunity to provide such information following the examination.	
	5.4.30 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.	
	5.4.31 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.	Section 9.8 of **ES Chapter 9: Ecology and Biodiversity** (Doc Ref 6.1) sets out the likely effects on designated sites of ecological importance, protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity. No likely significant residual effects have been identified, and as such, no compensatory measures are required.
	5.4.32 Before submitting an application, applicants should seek the views of the SNCB and Defra/Welsh Government as to the suitability, securability and effectiveness of the compensation plan to ensure the development will not hinder the achievement of the conservation objectives for the protected site. In cases where such views are provided, the applicant should include a copy of this information with the compensation plan in their application for further consideration by the Examining Authority.	
Applicant Assessment – Ancient woodland, ancient trees, veteran trees and other irreplaceable habitats	5.4.33 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.	Section 9.7 of **ES Chapter 9: Ecology and Biodiversity** (Doc Ref 6.1) sets out embedded mitigation measures to avoid and protect any ancient/veteran trees and priority habitats during the construction, operational and decommissioning phases of the Scheme (where required). There is no ancient woodland within or adjacent to the Order Limits.
Applicant Assessment – Protection and enhancement of habitats and species	5.4.34 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.	A description of how the Scheme will take advantage of opportunities to enhance biodiversity within the Order Limits and potentially of the wider environment is provided in **ES Chapter 9: Ecology and Biodiversity** (Doc Ref 6.1). Further details are also provided within the **Outline LEMP** (Doc Ref. 7.16). A BNG Assessment using Defra's Statutory Biodiversity Metric is included as part of the DCO Application within the **Biodiversity Net Gain Report** (Doc Ref. 7.9). As discussed in Section 7.4 of **ES Chapter 7: Climate Change** (Doc Ref. 6.1), an assessment of greenhouse gas (GHG) impacts from land use change associated with the conversion of arable land to grassland has been omitted to present a worst-case assessment. Though land use change due to the Scheme is anticipated to have an overall net positive GHG impact, due to the higher carbon sequestration value of grassland in comparison to cropland, it is expected that the land will return to its original use upon decommissioning of the Scheme, with any carbon stored in soil or vegetation re-released to the atmosphere. The beneficial GHG impact from land use change is therefore considered to only be temporary

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		(approximately 40 years) and has therefore been excluded from the lifecycle GHG impact assessment.
	5.4.35 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.	A description of how the Scheme will take advantage of opportunities to enhance biodiversity within the Order Limits and potentially of the wider environment is provided in **ES Chapter 9: Ecology and Biodiversity** (Doc Ref 6.1). Further details are also provided within the **Outline LEMP** (Doc Ref. 7.16). A BNG Assessment using Defra's Statutory Biodiversity Metric is included as part of the DCO Application within the **Biodiversity Net Gain Report** (Doc Ref. 7.9).
Mitigation	5.4.36 Applicants should include appropriate avoidance, mitigation, compensation and enhancement measures as an integral part of the proposed development. In particular, the applicant should demonstrate that: • during construction, they will seek to ensure that activities will be confined to the minimum areas required for the works; • the timing of construction has been planned to avoid or limit disturbance; • during construction and operation best practice will be followed to ensure that risk of disturbance or damage to species or habitats is minimised, including as a consequence of transport access arrangements; • habitats will, where practicable, be restored after construction works have finished; • opportunities will be taken to enhance existing habitats rather than replace them, and where practicable, create new habitats of value within the site landscaping proposals. Where habitat creation is required as mitigation, compensation, or enhancement, the location and quality will be of key importance. In this regard habitat creation should be focused on areas where the most ecological and ecosystems benefits can be realized; and • mitigations required as a result of legal protection of habitats or species will be complied with.	The management of biodiversity throughout the life of the Scheme will be covered by the following documents, included within the Application: • **Outline Construction Environmental Management Plan** (Outline CEMP) (Doc Ref 7.10) • **Outline Operational Environmental Management Plan** (Outline OEMP) (Doc Ref 7.11) • **Outline Decommissioning Environmental Management Plan** (Outline DEMP) (Doc Ref 7.12) • **Outline Landscape and Environmental Management Plan** (Outline LEMP) (Doc Ref 7.16) All of the above plans are secured via the DCO requirements within the **Draft DCO** (Doc Ref. 3.1). Section 9.8 of **ES Chapter 9: Ecology and Biodiversity** (Doc Ref 6.1) provides information on how the Scheme has mitigated for likely effects and taken advantage of opportunities to enhance biodiversity.
	5.4.37 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.	
Secretary of State decision making	5.4.40 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	**ES Chapter 9: Ecology and Biodiversity** (Doc Ref 6.1) has been produced with regard to the aims and goals of all relevant legislation and policy including the 25 Year Environment Plan.

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	Recovery Plan, and any relevant measures and targets, including statutory targets set under the Environment Act or elsewhere.	
	5.4.42 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 Applicant has considered the impact on habitats and those of local importance within **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1). Habitats assessed include aquatic marginal vegetation, hedgerows (including species rich), lines of trees (local), and lowland mixed deciduous woodland (local). Where enhancement to these habitats is delivered, there would be a minor beneficial (not significant) effect.
	5.4.43 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.	Section 9.8 of **ES Chapter 9: Ecology and Biodiversity** (Doc Ref 6.1) sets out the likely effects on designated sites of ecological importance, protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity. No likely significant residual effects have been identified, and as such, no compensatory measures have been proposed.
	5.4.44 If significant harm to biodiversity resulting from a development cannot be avoided (for example through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then the Secretary of State will give significant weight to any residual harm.	
	5.4.45 The Secretary of State 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.	The management of biodiversity throughout the life of the Scheme will be covered by the following documents, included within the Application: • **Outline Construction Environmental Management Plan** (Outline CEMP) (Doc Ref 7.10) • **Outline Operational Environmental Management Plan** (Outline OEMP) (Doc Ref 7.11) • **Outline Decommissioning Environmental Management Plan** (Outline DEMP) (Doc Ref 7.12) • **Outline Landscape and Environmental Management Plan** (Outline LEMP) (Doc Ref 7.16) All of the above plans are secured via the DCO requirements within the **Draft DCO** (Doc Ref. 3.1). All habitats and BNG provided by the Scheme would be maintained throughout the lifecycle of the Scheme.

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	5.4.46 The Secretary of State will need to take account of what mitigation measures may have been agreed between the applicant and the SNCB and the MMO/NRW (where appropriate). The Secretary of State will also need to consider whether the SNCB or the MMO/NRW has granted or refused, or intends to grant or refuse, any relevant licences, including protected species mitigation licences.	The **Schedule of Other Consents and Licences** (Doc Ref. 3.3) sets out the nature of the additional consents and licences likely to be required for the Scheme, including protected species licences. It includes a summary of progress made by the Applicant to obtain those additional consents and engagement with the relevant regulator (noting they do not need to be sought in parallel to the DCO application). A summary of engagement is also contained within **ES Chapter** (Doc Ref. 6.1) with Statements of Common Ground being progressed with regulators which will be updated throughout the course of the examination.
	5.4.47 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.	A description of how the Scheme will take advantage of opportunities to enhance biodiversity within the Order Limits and potentially of the wider environment is provided in **ES Chapter 9: Ecology and Biodiversity** (Doc Ref 6.1). Further details are also provided within the **Outline LEMP** (Doc Ref. 7.16), which is secured by a DCO requirement. A BNG Assessment using Defra's Statutory Biodiversity Metric is included as part of the DCO Application within the **Biodiversity Net Gain Report** (Doc Ref. 7.9).
	5.4.48 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.	
	5.4.49 In taking decisions, the Secretary of State should ensure that appropriate weight is attached to designated sites of international, national, and local importance; protected species; habitats and other species of principal importance for the conservation of biodiversity; and to biodiversity and geological interests within the wider environment.	Appropriate weight has been attached designated sites of international, national and local importance; protected species; habitats and other species of principal importance for the conservation of biodiversity; and to biodiversity and geological interest within the wider environment, with an assessment of the Scheme's impact on these set out in **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1).
	5.4.50 In making a decision, the Secretary of State must take into account any measures in relation to other plans or projects which are (i) located within the marine area and (ii) have been used or are identified for use to deliver: • compensatory measures for adverse effects on Special Protection Areas and Special Areas of Conservation; or • measures of equivalent environmental benefit for damage to MCZs. Any impact which negatively impacts the efficacy of the measure will need to be offset to ensure the original compensation requirement is satisfied.	N/A – There are no plans or projects in relation to the measures listed in paragraph 5.4.50 that are relevant for consideration as part of the Scheme.
Secretary of State decision making – Habitats Regulations	5.4.51 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 policy, either alone or in combination with other plans or projects.	The Applicant has prepared **ES Appendix 9-14: Habitats Regulations Assessment Report** (Doc Ref. 6.3) to inform the SoS's assessment under Regulation 63 of the Conservation of Habitats and Species Regulations 2017. The report considered the effects of the Scheme on European sites, both alone and in-combination with other projects, in view of their conservation objectives.

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		The HRA Report concludes that, taking into account the proposed mitigation, the Scheme would not give rise to an adverse effect on the integrity of any European site, either alone or in combination with other plans or projects, including in relation to collision risk from the overhead lines. Accordingly, the Secretary of State can ascertain that the requirements of Regulation 63 are met.
Secretary of State decision making – sites of special scientific interest (SSSIs)	5.4.52 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.	There are no nationally designated ecological sites within the Order Limits, however, there is an unattributed Impact Risk Zone (IRZ) associated with a SSSI which has been scoped in and considered within the assessment in **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1). The assessment confirms that stand off measures and controls contained within the **Outline CEMP** (Doc Ref. 7.10) and **Outline OEMP** (Doc Ref. 7.11) along with the proposed line markers for transmission lines within the Grid Connection Route would result in a negligible impact on the IRZ. These plans are secured within the Schedule 2 Requirements of the **Draft DCO** (Doc Ref. 3.1).
Secretary of State decision making – regional and local sites	5.4.54 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.	There are three Local Wildlife Sites within the Order Limits; Slys Connection, South Holland Main Drain and Wheatmere Drain. The Scheme does not directly impact any of these sites and interfaces would be managed through standoffs, method statements and pollution prevention measures secured within the **Outline CEMP** (Doc Ref. 7.10) and **Outline OEMP** (Doc Ref. 7.11). Effects on local ecological sites are expected to be negligible and not significant.
Secretary of State decision making – ancient woodland, ancient trees, veteran trees and other irreplaceable habitats	5.4.55 The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists.	The Applicant has prepared **ES Appendix 12-9: Arboricultural Impact Assessment** (Doc Ref. 6.3) which describes the nature of and impact to ancient and veteran trees within the Order Limits.
Secretary of State decision making – protection and enhancement of habitats and species	5.4.56 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.	The Applicant has considered the impact on habitats identified as being of importance for the conservation of biodiversity within **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1). Habitats assessed include aquatic marginal vegetation, hedgerows (including species rich), lines of trees (local), and lowland mixed deciduous woodland (local). Where enhancement to these habitats is delivered, there would be a minor beneficial (not significant) effect. All other effects are negligible. The Applicant has considered the impact on protected species identified as being of importance for the conservation of biodiversity and relevant habitat within **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1). The assessment concludes that without mitigation, there is the potential for a significant impact on skylark due to the loss of fields and disturbance associated with vegetation clearance. The Applicant has proposed habitat enhancement areas within the Order Limits to provide alternative nesting habitat for skylark.
	5.4.57 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.	

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		These areas are secured and detailed in the **Outline LEMP** (Doc Ref. 7.16) and in summary would see: Retention of arable/open fields to be managed as farmland bird mitigation areas. The creation of skylark plots in cereals (each approximately 16-25m^2) greater than 50 metres from field boundaries, spaced approximately 100 metres apart. Conservation headlands with margins of 6 to 10 metres. Limited disturbance during April to July, including avoidance of mowing, cutting and cultivation, and no routine night lighting in these areas. The Applicant also proposes measures to minimise the impact on other protected species including badger (local), barn owl (Schedule 1, local), bats - foraging/commuting assemblage (national), bats – tree roost features (local), breeding birds (local), otter (local), reptiles – common species (local), water vole (local), and wintering birds. No residual significant effects are reported in relation to these species.
5.5 Civil and military aviation and defence interests		
Applicant Assessment	5.5.38 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).	Impacts on the airfields from the potential glint and glare generated by the Scheme has been assessed within **ES Chapter 16: Other Environmental Topics, Section 16.4 Glint and Glare** (Doc Ref. 6.1) and **ES Appendix 16.2: Glint and Glare Assessment** (Doc Ref. 6.3).
	5.5.39 The requirement for ATC and non-cooperative surveillance – i.e. radar/tracking technologies – forms part of the environmental baseline for proposed developments.	Noted.
	5.5.40 The applicant should consult the MOD, Met Office, Civil Aviation Authority (CAA), NATS and any aerodrome – licensed or otherwise – likely to be affected by the proposed development in preparing an assessment of the proposal on aviation, meteorological or other defence interests.	During the Glint and Glare assessment, consultation has been undertaken with the airfields that may have potential to be affected by the Scheme. See **ES Chapter 16: Other Environmental Topics, Section 16.4 Glint and Glare** (Doc Ref. 6.1).
	5.5.41 Any assessment of effects on aviation, meteorological or other defence interests should include potential impacts of the project upon the operation of CNS infrastructure, flight patterns (both civil and military), generation of weather warnings and forecasts, other defence assets (including radar) and aerodrome operational procedures. It should also assess the demonstratable cumulative effects of the project with other relevant projects in relation to aviation, meteorological and defence.	This is addressed in **ES Appendix 16.2: Glint and Glare Assessment** (Doc Ref. 6.3) and a summary is presented in **ES Chapter 16: Other Environmental Topics, Section 16.4 Glint and Glare** (Doc Ref. 6.1).
	5.5.42 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	The Scheme would generate any additional bird strike, turbulence or thermal plume risks to aerodromes.

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	well as environmental mitigation and enhancement 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 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.	
	5.5.43 In addition, consideration of development near communication, navigation, and surveillance (CNS) infrastructure should take into account statutory technical safeguarding zones defined in accordance with Planning Circular 01/03, or any successor, and the potential for energy development, and/or its supporting infrastructure, to produce electro-magnetic and electrical noise interference which may degrade the capability or operation of defence CNS infrastructure.	N/A
	5.5.44 If any relevant changes are made to proposals during the pre-application and determination period, it is the responsibility of the applicant to ensure that the relevant aviation, meteorological and defence consultees are informed as soon as reasonably possible.	Noted.
Mitigation	5.5.45 The applicant should include appropriate mitigation measures as an integral part of the proposed development.	There are no OLSs associated with aerodromes near the Scheme. The Applicant has engaged with the Peterborough and Spalding Gliding Club which operates at Crowland Airfield regarding the design of the Scheme at Land Parcel A. Changes to the design were presented as part of the Applicant's targeted consultation to reflect changes made in consultation with the Gliding Club. These are secured through the **Works Plans** (Doc Ref. 2.3).
	5,5,46 Mitigation for infringement of OLS may include: • agreed changes to operational procedures of the aerodromes in accordance with relevant guidance, provided that safety assurances can be provided by the operator that are acceptable to the CAA where the changes are proposed to a civilian airport operators at an early stage of the planning process to understand the potential impacts of development on aviation operations and develop mitigations if appropriate; or • installation of obstacle lighting and/or by notification in Aeronautical Information Service publications	
Secretary of state decision making	5.5.51 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.	**ES Appendix 16-2: Glint and Glare Assessment** (Doc Ref. 6.3) to **ES Chapter 16: Other Environmental Topics** (Doc Ref. 6.1) has undertaken an assessment of the potential impacts of glint and glare on surrounding road users, railway operations, dwellings, PRoW, bridleways and aviation activity.

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		No significant impairment on aviation receptors is identified within **ES Chapter 16: Other Environmental Topics** (Doc Ref. 6.1) or **ES Appendix 16-2: Glint and Glare Assessment** (Doc Ref. 6.3).
	5.5.52 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.	N/A – There are no aerodromes near the Scheme, only grass-strip airfields.
	5.5.53 When assessing the necessity, acceptability, and reasonableness of operational changes to aerodromes, the Secretary of State should be satisfied that they have the necessary information regarding the operational procedures along with any demonstrable risks or harm of such changes, taking into account the cases put forward by all parties. When making such a judgement in the case of military aerodromes, the Secretary of State should have regard to interests of defence and national security	N/A – The Scheme would not have any impact on the operation of any aerodromes.
	5.5.55 If there are conflicts between the government's energy and transport policies and military interests in relation to the application, the Secretary of State should expect the relevant parties to have made appropriate efforts to work together to identify realistic and pragmatic solutions to the conflicts. In so doing, the parties should seek to protect the aims and interests of the other parties as far as possible, recognising simultaneously the evolving landscape in terms of the UK's energy security and the need to tackle climate change, which necessitates the installation of wind turbines and the need to maintain air safety and national defence and the national weather warning service.	N/A – No conflicts have been identified relevant to the Scheme.
	5.5.56 There are statutory requirements concerning lighting to tall structures. Where lighting is requested on structures that goes beyond statutory requirements by any of the relevant aviation and defence consultees, the Secretary of State should be satisfied of the necessity of such lighting taking into account the case put forward by the consultees. The effect of such lighting on the landscape and ecology may be a relevant consideration.	N/A - No lighting is proposed to tall structures. s
	5.5.57 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.	**ES Appendix 16-2: Glint and Glare Assessment** (Doc Ref. 6.3) to **ES Chapter 16: Other Environmental Topics** (Doc Ref. 6.1) has undertaken an assessment of the potential impacts of glint and glare on surrounding road users, railway operations, dwellings, PRoW, bridleways and aviation activity. No significant impairment on aviation receptors is identified within **ES Chapter 16: Other Environmental Topics** (Doc Ref. 6.1) or **ES Appendix 16-2: Glint and Glare Assessment** (Doc Ref. 6.3).

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	5.5.59 In order to avoid unacceptable adverse impacts of electro-magnetic and electrical noise interference from energy development, and/or its supporting infrastructure, and associated infrastructure on defence technical assets and operations, 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 DCO applications.	Section 16.3 of **ES Chapter 16: Other Environmental Topics** (Doc Ref. 6.1) provides a summary of the effects of the Scheme on EMF as detailed within the **EMF Compliance Assessment** (Doc Ref. 7.8).
	5.5.60 Where suitable technological solutions have not yet been developed or proven, the Secretary of State will need to consider the likelihood of a solution becoming available within the time limit for implementation of the Development Consent Order.	N/A
	5.5.61 Where a proposed energy infrastructure development would significantly impede or compromise the safe and effective use of civil or military aviation, meteorological radars, defence assets and/or significantly limit military training, the Secretary of State may consider the use of 'Grampian conditions', or other forms of requirement which relate to the use of current or future technological solutions, to mitigate impacts on legacy CNS equipment.	N/A – The Scheme would not have an impact on any civil and military aviation or defence assets.
	5.5.62 Where, after reasonable mitigation, operational changes, obligations and requirements have been proposed, the Secretary of State should consider whether: • a development would prevent a licensed aerodrome from maintaining its licence and the defence, or result in substantial local/national economic loss, or emergency service needs • it would cause harm to aerodromes' training or emergency service needs • the development would impede or compromise the safe and effective use of defence assets or unacceptably limit military training • the development would have a negative impact on the safe and efficient provision of en-route air traffic particular through an adverse effect on CNS infrastructure • the development would compromise the effective provision of weather warnings by the NSWWS, or flood warnings by the UK's flood agencies	
	5.5.63 Provided that the Secretary of State is satisfied that the impacts of proposed energy developments do not present risks to national security and physical safety, and where they do, provided that the Secretary of State is satisfied that appropriate mitigation can be achieved, or appropriate requirements can be attached to any Development Consent Order to secure those mitigations, consent may be granted.	
5.7 Dust, odour, artificial light, smoke, steam and insect infestation		

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Applicant Assessment	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.	Emissions are described through a number of ES Chapters including **ES Chapter 2: The Scheme** (Doc Ref. 6.1), **ES Chapter 6: Air Quality** (Doc Ref. 6.1), **ES Chapter 7: Climate Change** (Doc Ref. 6.1), **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1), **ES Chapter 13: Noise and Vibration** (Doc Ref. 6.1), **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1) and **ES Chapter 16: Other Environmental Topics** (Doc Ref. 6.1). Section 6.7 of **ES Chapter 6: Air Quality** (Doc Ref. 6.1) assesses the effects of the Scheme on emissions of dust. Good site practice mitigation measures are incorporated into the **Outline CEMP** (Doc Ref. 7.11). They are considered to be embedded mitigation and represent good industry practices that are part of the Scheme. The mitigation measures proposed for implementation during construction will also be appropriate for decommissioning as set out in the **Outline DEMP** (Doc Ref. 7.12). The **Outline Battery Safety Management Plan** (Doc Ref. 7.18) sets out the safety measures proposed to be installed to reduce fire risk as well as fire protection measures. The Scheme is not anticipated to cause any effects from insect infestation, steam, odour or other effluvia. Construction and decommissioning activities will be undertaken using best practice measures to minimise air emissions, as set out in the **Outline CEMP (**Doc Ref. 7.10) and **Outline DEMP** (Doc Ref. 7.12).
	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 emissions on identified premises or locations; • Measures to be employed in preventing or mitigating the emissions.	
	5.7.7 The applicant is advised to consult the relevant LPA and, where appropriate, the EA about the scope and methodology of the assessment.	As detailed in **ES Chapter 6: Air Quality** (Doc Ref 6.1) and in the **Consultation Report** (Doc Ref 5.1), the Applicant has been in consultation with the South Holland District Council Environmental Health Officer and the Lincolnshire County Council Environmental Health Officer.
Mitigation	5.7.8 Mitigation measures may include one or more of the following: • engineering: prevention of a specific emission at the point of generation; control, containment and abatement of emissions if generated; • lay-out: adequate distance between source and sensitive receptors; reduced transport or handling of material; • administrative: limiting operating times; restricting activities allowed on the site; implementing management plans.	Mitigation measures are documented within and will be secured by the **Outline CEMP** (Doc Ref. 7.10) and the **Outline DEMP** (Doc Ref. 7.12). These include but are not limited to, proper preparation and maintenance of the Site, sustainable travel waste management, setbacks from woodlands, residential properties and Local Wildlife Sites, continue communication with the community and relevant stakeholders, site management and site monitoring/inspections.
	5.7.9 Construction should be undertaken in a way that reduces emissions, for example the use of low emission mobile plant during the construction, and demolition phases as appropriate, and consideration should be given to making these mandatory in Development Consent Order requirements.	
	5.7.10 Demolition considerations should be embedded into designs at the outset to enable demolition techniques to be adopted that remove the need for explosive demolition.	
	5.7.11 A construction management plan may help clarify and secure mitigation.	

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Secretary of state decision making	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 Chapter 6: Air Quality** (Doc Ref. 6.1) assesses the effects of the Scheme on emissions of dust. No significant adverse effects are reported. The Scheme will not emit any odour. Construction and decommissioning activities will be undertaken with the use of best practice measures applied as set out in the **Outline CEMP** (Doc Ref. 7.10) and **Outline DEMP** (Doc Ref. 7.12). The **Outline Battery Safety Management Plan** (Doc Ref. 7.18) sets out the safety measures proposed to be installed to reduce fire risk as well as fire protection measures. The Scheme is not anticipated to cause any effects from insect infestation, steam, odour or other effluvia. Construction and decommissioning activities will be undertaken using best practice measures to minimise air emissions, as set out in the **Outline CEMP (**Doc Ref. 7.10) and **Outline DEMP** (Doc Ref. 7.12).
	5.7.13 If development consent is granted for a project, the Secretary of State should consider whether there is a justification for all of the authorised project (including any associated development) to be covered by a defence of statutory authority against nuisance claims. If the Secretary of State cannot conclude that this is justified, the Secretary of State should disapply in whole or in part the defence through a provision in the Development Consent Order.	The **Statutory Nuisance Statement** (Doc Ref. 7.5) identifies and assesses the potential for statutory nuisance arising from the Scheme in respect of matters listed under section 79(1) of the Environmental Protection Act 1990, including dust, noise, light, vibration and effects on health. The assessment concludes that, with the implementation of the identified mitigation measures, the Scheme would not give rise to significant statutory nuisance effects during construction, operation (including maintenance) or decommissioning. Accordingly, the Secretary of State can be satisfied that an appropriate assessment has been undertaken and that all reasonable steps have been, and will be, taken to minimise any potential detrimental impacts on amenity. Notwithstanding this conclusion, the **Draft DCO** (Doc Ref. 3.1) includes specific provision in Article 8 in relation to proceedings under section 82 of the Environmental Protection Act 1990. Article 8 limits the availability of the statutory authority defence to circumstances where any noise nuisance is an unavoidable consequence of the authorised development and cannot reasonably be avoided. This approach ensures that the defence of statutory authority is not applied on a blanket basis and reflects the discretion envisaged by paragraph 5.7.13 of the policy and section 158(3) of the PA 2008.
	5.7.14 Where the Secretary of State believes it appropriate, the Secretary of State may consider attaching requirements to the development consent, to secure certain mitigation measures.	The Applicant considers that all relevant mitigation has been secured via appropriate mechanisms within the **Draft DCO** (Doc Ref. 3.1).
	5.7.15 In particular, the Secretary of State should consider whether to require the applicant to abide by a scheme of management and mitigation concerning insect infestation and emissions of odour, dust, steam, smoke, and artificial light from the development. The Secretary of State should consider the need for such a scheme to reduce any loss to amenity which might arise during the construction, operation	No such effects are anticipated within the **ES** (Doc Ref. 6.1). The Applicant considers that all relevant mitigation has been secured via appropriate mechanisms within the **Draft DCO** (Doc Ref. 3.1).

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	and decommissioning of the development. A construction management plan may help codify mitigation at that stage.	
5.8 Flood Risk		
Applicant Assessment	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.	**ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1) confirms that flood risk during construction and at decommissioning will be managed through the CEMP and DEMP, which will be secured by the DCO and required to be in substantial accordance with the **Outline CEMP** (Doc Ref. 7.10) and **Outline DEMP** (Doc Ref. 7.12). Opportunities for environmental enhancement in relation to water are detailed in the **Design Approach Document** (Doc Ref. 7.3). **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1) assesses flood risk and drainage in the context of EIA. This concludes that with the proposed mitigation measures to implemented as part of the CEMP and DEMP, no significant effects will arise in relation to the water environment. Given the design mitigation securing through the OEMP, no significant adverse effects will be predicted on receptors with regard to flood risk during the operation of the Scheme. **ES Appendix 11-4: Outline Drainage Strategy** (Doc Ref. 6.3) has been prepared setting out how surface water will be managed across the Scheme to avoid an increase in flood risk elsewhere. A detailed Water Drainage Strategy will be secured by a requirement of the **Draft DCO** (Doc Ref. 3.1).
	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 Defended Flood Zones 2 and 3 in Wales. In Flood Zone 1 in England or Zone 1 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 Appendix 11-3: Flood Risk Assessment** (FRA) (Doc Ref. 6.3) provides an assessment of flood risk to and from the Scheme from all sources of flooding. The FRA demonstrates how residual flood risk will be managed during the construction, operation and decommissioning of the Scheme. The FRA meets all requirements set out within the policy, including the consideration of climate change. The findings of the FRA are summarised in **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref 6.1).
	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.	

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	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 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:	The minimum requirements are noted and are incorporated in **ES Appendix 11-3: Flood Risk Assessment** (Doc Ref. 6.3).

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	i. Describe the existing surface water drainage arrangements for the site ii. Set out (approximately) the existing rates and volumes of surface water run-off generated by the site. Detail the proposals for restricting discharge rates iii. Set out proposals for managing and discharging surface water from the site using sustainable drainage systems and accounting for the predicted impacts of climate change. If sustainable drainage systems have been rejected, present clear evidence of why their inclusion would be inappropriate iv. Demonstrate how the hierarchy of drainage options has been followed. v. Explain and justify why the types of SuDS219 and method of discharge have been selected and why they are considered appropriate. vi. Explain how sustainable drainage systems have been integrated with other aspects of the development such as open space or green infrastructure, so as to ensure an efficient use of the site vii. Describe the multifunctional benefits the sustainable drainage system will provide viii. Set out which opportunities to reduce the causes and impacts of flooding have been identified and included as part of the proposed sustainable drainage system ix. Explain how run-off from the completed development will be prevented from causing an impact elsewhere x. Explain how the sustainable drainage system been designed to facilitate maintenance and, where relevant, adoption. Set out plans for ensuring an acceptable standard of operation and maintenance throughout the lifetime of the development • detail those measures that will be included to ensure the development will be safe and remain operational during a flooding event throughout the development's lifetime without increasing flood risk elsewhere; • detail those measures that will be included to ensure the development will be safe and remain operational during a flooding event throughout the development's lifetime without increasing flood risk elsewhere; • be supported by appropriate data and information, including historical	

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	information on previous events.	
	5.8.16 Further guidance can be found in the Planning Practice Guidance Flood Risk and Coastal Change section which accompanies the NPPF, TAN15 for Wales or successor documents.	**ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1) and **ES Appendix 11-3: Flood Risk Assessment** (Doc Ref. 6.3) considers relevant sections of the Planning Practice Guidance, the NPPF, and the government's associated planning guidance on water.
	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; and • Their condition or structural integrity is not reduced	**ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1) presents the assessment of the likely significant effects on surface water bodies (e.g. rivers, streams, ditches, canals, lakes and ponds). The **Outline CEMP** (Doc Ref. 7.10), **Outline OEMP** (Doc Ref. 7.11) and **Outline DEMP** (Doc Ref. 7.12) includes measures to protect watercourses. **ES Appendix 11-4: Outline Drainage Strategy** (Doc Ref. 6.3) sets out the framework for the detailed drainage scheme to ensure that surface water runoff is attenuated to greenfield runoff rates and managed, including dealing with risk management associated with potentially contaminated water associated with fire water runoff. **ES Appendix 11-4: Outline Drainage Strategy** (Doc Ref. 6.3) also sets out details with respect to future management and maintenance.
	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.	Consultation undertaken (including the EA and IDBs) is outlined within Section 11.3 of **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1) and presented within **ES Appendix 11-3: Flood Risk Assessment** (Doc Ref. 6.3). The Applicant has regularly engaged with the Environment Agency and Internal Drainage Boards on its flood risk modelling and outputs.
	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.	
	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.	
	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.	The **Flood Risk Assessment** (FRA) (Doc Ref. 6.3) demonstrates that a sequential approach has been applied in selecting the land for the Scheme and to subsequent layout and design of the solar infrastructure within the Site. Application of the Sequential Test is also set out within the **Planning Statement** (Doc Ref. 7.1).
	5.8.22 The technology specific NPSs set out some exceptions to the application of the Sequential Test. However, when seeking development consent on a site	Noted. The Scheme is not excepted from application of the Sequential Test.

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	allocated in a development plan through the application of the Sequential Test, informed by a strategic flood risk assessment, applicants need not apply the Sequential Test, provided the proposed development is consistent with the use for which the site was allocated and there is no new flood risk information that would have affected the outcome of the test.	
	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 consideration of alternative sites and flood risk is detailed in **Appendix D: Site Selection Report** (Doc Ref. 7.1). It concludes that there are no reasonably available sites of a size appropriate for NSIP scale solar development wholly outside of Flood Zones 2 and 3.
Mitigation	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 Appendix 11-3: Flood Risk Assessment** (Doc Ref. 6.3) sets out the proposed mitigation measures embedded into the design of the Scheme to manage flood risk.
	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; and • flood routes to carry and direct excess water through developments to minimise the impact of severe rainfall flooding	**ES Appendix 11-4: Outline Drainage Strategy** (Doc Ref. 6.3) provides an outline strategy for drainage. The strategy includes the use of SuDS techniques.
	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 Appendix 11-3: Flood Risk Assessment** (Doc Ref. 6.3) assess the flood risk and drainage in the context of the EIA. This concludes that with the proposed mitigation measures to be implemented as part of the Scheme, as secured within the control documents, there will be no material change to flood risk from all sources with no significant effects reported. **ES Appendix 11-4: Outline Drainage Strategy** (Doc Ref. 6.3) demonstrates surface water drainage will be manged effectively to ensure there is no increase in surface water runoff from the Scheme above the existing regime. No compensatory storage is required.
	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 Appendix 11-4: Outline Drainage Strategy** (Doc Ref. 6.3) proposes a system for new impermeable areas during the with-Scheme scenario designed to accommodate the 1 in 100-year storm, plus a 40% allowance for an increase in peak rainfall intensity due to climate change.**ES Appendix 11-3: Flood Risk Assessment**

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		ES Appendix 11-3: Flood Risk Assessment (Doc Ref. 6.3) demonstrates there will not be any material increase in flood risk, from all sources, as a result of the Scheme, within the Order Limits or elsewhere, with the proposed embedded mitigation in place. **ES Appendix 11-4: Outline Drainage Strategy** (Doc Ref. 6.3) demonstrates surface water drainage will be manged effectively to ensure there is no increase in surface water runoff from the Scheme above the existing regime.
	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.	N/A - No additional storage is required.
	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.	**ES Appendix 11-3: Flood Risk Assessment** (Doc Ref. 6.3) sets out the indicative location of critical infrastructure in relation to the functional floodplain extents as well as detailing the application of the Sequential Test. It demonstrates that all critical infrastructure can be sited outside of Flood Zone 3b extents with the exception of six solar stations within the Gotts Catchment at Land Parcel D.
	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.	N/A - The Scheme would not increase flood risk elsewhere.
	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.	N/A - No compensatory storage is required.
	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.	N/A – The Scheme would not contribute to a cumulative increase in flood risk elsewhere.
	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.	The **Outline CEMP** (Doc Ref. 7.10) secures the preparation of an Emergency Response Plan (ERP) 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 potential pollution incidents. The ERP will detail the procedures for responding to incidents and emergencies on site, and any reporting requirements. The ERP will also include details of the evacuation plans for the Site on receipt of a flood warning.
	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.	

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	5.8.35 Flood resistant and resilient materials and design should be adopted to minimise damage and speed recovery in the event of a flood.	The **Design Parameters** (Doc Ref. 7.4) secure design measures (e.g. minimum freeboard heights) to ensure the secure operation of the Scheme in the event of a flood. These measures are also detailed in **ES Appendix 11-3: Flood Risk Assessment** (Doc Ref. 6.3).
Secretary of State decision making	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 (subject to the exception set out in paragraph 5.8.22 of this NPS, and any technology specific exceptions set out in other NPSs); • a sequential approach has been applied at the site level to minimise risk by directing the most vulnerable uses to areas of lowest flood risk; • the proposal is in line with any relevant national and local flood risk management strategy; • 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 5.8.22); • 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 to the extent that development would not prevent or hinder its construction, operation or maintenance	**ES Appendix 11-3: Flood Risk Assessment** (Doc Ref. 6.3) is included within the application, the findings of which are summarised in **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1) in EIA terms. It includes all the necessary information required under paragraph 5.8.36.
	5.8.37 For energy projects which have drainage implications, approval for the project's drainage system, including during the construction period, will form part of the development consent issued by the Secretary of State. The Secretary of State will therefore need to be satisfied that the proposed drainage system complies with any National Standards published by Ministers under paragraph 5(1) of Schedule 3 to the Flood and Water Management Act 2010.	**ES Appendix 11-4: Outline Drainage Strategy** (Doc Ref. 6.3) outlines a strategy for the Scheme and is assessed in **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1). The drainage and treatment system will be regularly inspected and maintained to ensure that any failures are quickly identified and repaired so as to prevent water pollution. A programme of inspection and maintenance will be designed by the contractor and dedicated construction personnel assigned to manage this programme. The final surface water discharge from basins and swales shall be regularly inspected for issues. Where necessary, surface water may require pumping on a temporary basis for
	5.8.38 In addition, the Development Consent Order, or any associated planning obligations, will need to make provision for appropriate operation and maintenance of any SuDS throughout the project's lifetime. Where this is secured through the adoption of any SuDS features, any necessary access rights to property will need to be granted.	

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	5.8.39 Where relevant, the Secretary of State should be satisfied that the most appropriate body is being given the responsibility for maintaining any SuDS, taking into account the nature and security of the infrastructure on the proposed site. Responsible bodies could include, for example the landowner, the relevant lead local flood authority or water and sewerage company (through the Ofwat-approved Sewerage Sector Guidance), or another body, such as an Internal Drainage Board.	maintenance purposes. Any pumping activities shall be supervised and authorised by the Principal Contractor. A detailed drainage strategy will be produced in the next stage of the design process in substantial accordance with **ES Appendix 11-4: Outline Drainage Strategy** (Doc Ref. 6.3).
	5.8.40 If the EA, NRW or another flood risk management authority continues to have concerns and objects to the granting of development consent on the grounds of flood risk, the Secretary of State can grant consent, but would need to be satisfied before deciding whether or not to do so that all reasonable steps have been taken by the applicant and the authority to try to resolve the concerns.	Noted. The Applicant has engaged throughout the pre-application stage with the Environment Agency and the relevant Internal Drainage Boards. A summary of engagement and main matters raised are set out within **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1). The Applicant intends to submit Statements of Common Ground to demonstrate resolution towards any matters that remain outstanding.
	5.8.41 Energy projects should not normally be consented within Flood Zone 3b , or Zone C2 in Wales, or on land expected to fall within these zones within its predicted lifetime. This may also apply where land is subject to other sources of flooding (for example surface water). However, where essential energy infrastructure has to be located in such areas, for operational reasons, they should only be consented if the development will not result in a net loss of floodplain storage, and will not impede water flows.	As set out within **Appendix D: Site Selection Report** (Doc Ref. 7.1) and **ES Appendix 11-3: Flood Risk Assessment** (Doc Ref. 6.3), there are some elements of essential infrastructure for the Scheme that have a requirement to be located within Flood Zone 3b. This includes the six solar stations within the Gotts Catchment at Land Parcel D. These structures would be raised on plinths not to impede water flows and would not result in a net loss of floodplain storage.
	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.	
5.9 Historic Environment		
Applicant Assessment	5.9.11 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.	**ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1) provides an assessment of the Scheme on the historic environment, including above, at, and below ground assets, including a cumulative effects assessment. An assessment of the value (heritage significance) of heritage assets, including the contribution made by setting, is included in within Section 8.9 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1), as well as in **ES Appendix 8.2: Cultural Heritage Desk Based Assessment** (Doc Ref. 6.3). Data sources are stated **in ES Appendix 8.2: Cultural Heritage Desk Based Assessment** (Doc Ref. 6.3) and include the relevant local authority Historic Environmental Record.
	5.9.12 As part of the ES the applicant should provide a description of the significance of the heritage assets affected by the proposed development, including any contribution made by their setting. The level of detail should be proportionate	

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	to the importance of the heritage assets and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum, the applicant should have consulted the relevant Historic Environment Record (or, where the development is in English or Welsh waters, Historic England or Cadw) and assessed the heritage assets themselves using expertise where necessary according to the proposed development's impact	A summary of all heritage features and settings is set out within **ES Appendix 8-3: Summary of Solar Development Heritage** (Doc Ref. 6.3) and **ES Appendix 8-4: Summary of Heritage Setting Assessment** (Doc Ref. 6.3).
	5.9.13 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.	A desk-based assessment, alongside the geophysical survey and available trial trenching results, are presented in **ES Appendix 8.2: Cultural Heritage Desk Based Assessment** (Doc Ref. 6.3). The results of the fieldwork surveys will be lodged with the relevant planning authority Historic Environment Record. A summary of all heritage features and settings is set out within **ES Appendix 8-3: Summary of Solar Development Heritage** (Doc Ref. 6.3) and **ES Appendix 8-4: Summary of Heritage Setting Assessment** (Doc Ref. 6.3). The Applicant has undertaken field evaluation, the results of which will be presented in a report and submitted during the early stages of the examination as a sensitivity to test the conservative assumptions already included in the DCO Application.
	5.9.14 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.	An assessment of the impacts of the Scheme is provided within Section 8.9 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1). This includes consideration of noise, vibration, light and indirect impacts. A summary of all heritage features and settings is set out within **ES Appendix 8-3: Summary of Solar Development Heritage** (Doc Ref. 6.3) and **ES Appendix 8-4: Summary of Heritage Setting Assessment** (Doc Ref. 6.3).
	5.9.15 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; and • 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	The Applicant has considered heritage opportunities as part of design development. One of the Design Principles, as set out in the **Design Approach Document** (Doc Ref. 7.3) is to 'respect the history of the site and seek to protect cultural heritage'. The Scheme avoids direct impacts to the Scheduled Monuments located within the Order Limits and 20m buffers are proposed to limit direct impacts on the setting of those assets. The Applicant proposes a permissive path within Land Parcel C which runs adjacent to a Scheduled Monument which provides an opportunity to open up the land adjacent to the asset for public access. The Applicant intends to install interpretative material along the route related to both natural and cultural heritage.
	5.9.16 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.	An assessment of the impacts of the Scheme is provided within Section 8.9 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1). It sets out the nature of the impact on each asset.
	5.9.17 Applicants should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage	N/A – The Scheme does not include any development within, or within the setting of, any World Heritage Sites or Conservation Areas.

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	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.	
Mitigation	5.9.18 A documentary record of our past is not as valuable as retaining the heritage asset, and therefore the ability to record evidence of the asset should not be a factor in deciding whether such loss should be permitted, and whether or not consent should be given.	Consideration of the impacts of the Scheme upon cultural heritage including assets which may be lost, is provided within Section 8.9 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1). The design of the Scheme has sought to avoid and minimise the impact on heritage assets. Where it is not possible to avoid or minimise the impact, mitigation would be implemented through a proportionate programme of archaeological investigation, recording and reporting. Archaeological excavation in advance of construction, archaeological monitoring during intrusive activities, and further assessment and analysis of samples and artefacts retrieved during previous evaluation surveys, would form additional mitigation. This would not result in a reduction in the physical impacts to archaeological remains but would partially compensate for their loss as it would provide greater understanding and appreciation of the evidential value of the affected archaeological remains
	5.9.19 Where the loss of the whole or part of a heritage asset's significance is justified, the Secretary of State will require the applicant to record and advance understanding of the significance of the heritage asset before it is lost (wholly or in part). The extent of the requirement should be proportionate to the asset's importance and significance and the impact. The applicant should be required to publish this evidence and to deposit copies of the reports with the relevant Historic Environmental Record. They should also be required to deposit the archive generated in a local museum or other public repository willing to receive it.	The proposed approach to the recording of assets before they are lost will be agreed via the Outline Archaeological Mitigation and Management Strategy to be submitted in the early stages of examination as secured by requirement within the **Draft DCO** (Doc Ref. 3.1).
	5.9.20 Where appropriate, the Secretary of State will impose requirements on the Development Consent Order to ensure that the work is undertaken in a timely manner, in accordance with a written scheme of investigation that complies with the policy in this NPS and which has been agreed in writing with the relevant local authority, and to ensure that the completion of the exercise is properly secured.	
	5.9.21 Where the loss of significance of any heritage asset has been justified by the applicant on the merits of the new development and the significance of the asset in question, the Secretary of State should consider: • imposing a requirement in the Development Consent Order; and • requiring the applicant to enter into an obligation	
	5.9.22 Where there is a high probability (based on an adequate assessment) that a development site may include, as yet undiscovered heritage assets with archaeological interest, the Secretary of State will consider requirements to ensure appropriate procedures are in place for the identification and treatment of such assets discovered during construction.	

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Secretary of State decision making	5.9.23 In determining applications, 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, including by development affecting the setting of a heritage asset, taking account of: • relevant information provided with the application and, where applicable, relevant information submitted during the examination of the application; • any designation records, including those on the National Heritage List for England, or included on Cof Cymru for Wales; • historic landscape character records; • the relevant Historic Environment Record(s), and similar sources of information; • representations made by interested parties during the examination process; and • expert advice, where appropriate, and when the need to understand the significance of the heritage asset demands it.	An assessment of the value (heritage significance) of heritage assets, including the contribution made by setting, is included in within Section 8.9 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1), as well as in **ES Appendix 8.2: Cultural Heritage Desk Based Assessment** (Doc Ref. 6.3). Data sources are stated **in ES Appendix 8.2: Cultural Heritage Desk Based Assessment** (Doc Ref. 6.3).
	5.9.24 The Secretary of State must also comply with the requirements on listed buildings, conservation areas and scheduled monuments, set out in Regulation 3 of the Infrastructure Planning (Decisions) Regulations 2010.	As assessment of the impacts of the Scheme is provided within Section 8.9 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1). The methodology for the assessment is provided in Section 8.4 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1) with reference to both embedded and additional mitigation provided at Sections 8.8 and 8.10 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1). Cumulative effects are assessed in Section 8.12 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1). The Assessment Methodology section sets out the process for ascribing cultural significance to an asset and attributing importance.
	5.9.25 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.	An assessment of the impacts of the Scheme is provided within Section 8.9 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1). A summary of all heritage features and settings is set out within **ES Appendix 8-3: Summary of Solar Development Heritage** (Doc Ref. 6.3) and **ES Appendix 8-4: Summary of Heritage Setting Assessment** (Doc Ref. 6.3).
	5.9.26 The Secretary of State should consider the desirability of sustaining and, where appropriate, enhancing the significance 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.	The Applicant has considered heritage opportunities as part of design development. One of the Design Principles, as set out in the **Design Approach Document** (Doc Ref. 7.3) is to 'respect the history of the site and seek to protect cultural heritage'. The Scheme avoids direct impacts to the Scheduled Monuments located within the Order Limits and 20m buffers are proposed to limit direct impacts on the setting of those assets. The Applicant proposes a permissive path within Land Parcel C which runs adjacent to a Scheduled Monument which provides an opportunity to open up the land adjacent to the
	5.9.27 The Secretary of State should also consider the desirability of the new development making a positive contribution to the character and local distinctiveness of the historic environment. The consideration of design should	

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	include scale, height, massing, alignment, materials, use and landscaping (for example, screen planting).	asset for public access. The Applicant intends to install interpretative material along the route related to both natural and cultural heritage.
	5.9.28 When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset's conservation. The more important the asset, the greater the weight should be. This is irrespective of whether any potential harm amounts to substantial harm, total loss, or less than substantial harm to its significance.	The Applicant has provided as assessment of harm to heritage assets within **Appendix E: Heritage Statement of Harm** (Doc Ref. 7.1). It concludes that the Scheme would not result in substantial harm or total loss to any designated heritages assets (or equivalent). As the harm to heritage assets identified is less than substantial, the Applicant is not required to demonstrate exceptional or wholly exceptional circumstances in line with the tests set out in paragraph 5.9.32 of EN-1.
	5.9.29 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.	
	5.9.30 Substantial harm to or loss of significance of a grade II Listed Building or a grade II Registered Park or Garden should be exceptional.	
	5.9.31 Substantial harm to or loss of significance of assets of the highest significance, including Scheduled Monuments; Protected Wreck Sites; Registered Battlefields; grade I and II* Listed Buildings; grade I and II* Registered Parks and Gardens; and World Heritage Sites, should be wholly exceptional.	
	5.9.32 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; and • the harm or loss is outweighed by the benefit of bringing the site back into use.	
	5.9.33 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.	**Appendix E: Heritage Statement of Harm** (Doc Ref. 7.1) concludes that the Scheme would not result in substantial harm or total loss to any designated heritages assets (or equivalent). The **Planning Statement** (Doc Ref. 7.1) explains that the importance of the Scheme towards meeting the UK's net zero and energy security ambitions, and its status as CNP infrastructure within EN-1 outweigh the less than substantial harm reported within the Heritage Statement of Harm. Measures are to be set out in the Outline Archaeology Mitigation and Management Strategy (OAMMS) (to be submitted in the early stages of examination) and Archaeology Mitigation
	5.9.34 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.	

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		and Management Strategy (AMMS) informed by the results of the archaeological evaluation, which will be secured by DCO requirement.
	5.9.35 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 5.9.31, 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.	N/A – The Scheme does not include any development within, or within the setting of, any World Heritage Sites or Conservation Areas.
	5.9.36 Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the Secretary of State should not take its deteriorated state into account in any decision.	N/A.
	5.9.37 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 of 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.	An assessment of the impacts of the Scheme is provided within Section 8.9 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1). It concludes a number of significant adverse effects on heritage assets due to the density of archaeological potential in the Solar Development Area. The Applicant has sought to avoid direct impacts on designated heritage assets, however there will be some impacts on the setting of designated heritage assets due to the presence of Scheme infrastructure near its setting. The additional mitigation measures described in **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1) comprising a programme of archaeological investigation, recording, reporting and public engagement would not minimise the physical impact to archaeological deposits, as the archaeological significance would still be lost, but would partially compensate for their loss by creating a record of the assets and advancing professional and public understanding of their archaeological significance **Appendix E: Heritage Statement of Harm** (Doc Ref. 7.1) concludes that the Scheme would not result in substantial harm or total loss to any designated heritages assets (or equivalent). The **Planning Statement** (Doc Ref. 7.1) explains that the importance of the Scheme towards meeting the UK's net zero and energy security ambitions, and its status as CNP infrastructure within EN-1 outweigh the less than substantial harm reported within the Heritage Statement of Harm.
5.10 Landscape and Visual		
Applicant Assessment	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.	**ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1) assesses the potential landscape and visual impacts of the Scheme and includes a cumulative effects assessment. The **Design Approach Document** (Doc Ref. 7.3) demonstrates how the principles of 'good design' have been applied to the Scheme. Landscape mitigation is also described in the **Outline LEMP** (Doc Ref. 7.16). This has been considered in Section 12.7 Embedded
	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	

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	should also take account of any relevant policies based on these assessments in local development documents in England and local development plans in Wales.	Mitigation of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1) and referenced figures and appendices. The Scheme will not impact any National Parks, the Broads or National Landscapes.
	5.10.18 For seascapes, applicants should consult the Seascape Character Assessment and the Marine Plan Seascape Character Assessments, and any successors to them.	
	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.	
	5.10.20 The assessment should include the effects on landscape components and character (including key characteristics) during construction and operation. For projects which may affect a National Park, The Broads or an National Landscape the assessment should include effects on the natural beauty and special qualities of these areas.	
	5.10.21 The assessment should include the visibility and conspicuousness of the project during construction and of the presence and operation of the project and potential impacts on views and visual amenity. This should include light pollution effects, including on dark skies, local amenity, and nature conservation.	
	5.10.22 The assessment should also address the landscape and visual effects of 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, and how these will be minimised.	
	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** (Doc Ref. 7.16) sets out the proposed landscape strategy and provides the outline landscape masterplans. This has also been considered in Section 12.7 Embedded Mitigation of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1) and referenced figures and appendices.
	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.	This has been considered in Section 12.8 Assessment of Likely Effects of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1) and referenced figures and appendices. **ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1) describes the operational constraints that have factored into design of the Scheme. This includes the requirement for specific types of lattice towers for the Grid Connection Route in order to convey the electricity at the required voltage. The **Design Approach Document** (Doc Ref. 7.3) demonstrates how the principles of 'good design' have been applied to the Scheme. Landscape mitigation is also described in the **Outline LEMP** (Doc Ref. 7.16). This has been considered in Section 12.7 Embedded
Mitigation	5.10.26 Reducing the scale of a project can help to mitigate the visual and landscape effects of a proposed project. However, reducing the scale or otherwise amending the design of a proposed energy infrastructure project may result in a significant operational constraint and reduction in function – for example, electricity generation output. There may, however, be exceptional circumstances, where mitigation could have a very significant benefit and warrant a small reduction	

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	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.	Mitigation of **ES Chapter 12: Landscape and Visual (Doc Ref. 6.1) and referenced figures and appendices.**
	5.10.27 Adverse landscape and visual effects may be minimised through appropriate siting of infrastructure within its development site and wider setting. The careful consideration of colours and materials will support the delivery of a well-designed scheme, as will sympathetic landscaping and management of its immediate surroundings.	
	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.	
Secretary of State decision making	5.10.29 The Secretary of State should take into consideration the level of detailed design which the applicant has provided and is secured in the Development Consent Order, and the extent to which design details are subject to future approvals.	The **Design Parameters** (Doc Ref. 7.4) set out the maximum parameters of the Scheme that the detailed design is required to comply with as secured by Requirement 5 to the **Draft DCO** (Doc Ref. 3.1). This requirement also secures detailed design approval from the local planning authority. The Applicant will be required to provide details of the following as part of discharging the detailed design requirement: • layout; • scale; • proposed finished ground levels; • external appearance; • hard surfacing materials; • vehicular and pedestrian access, parking, and circulation areas; and • refuse or other storage units, fencing, signs and lighting
	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.	
	5.10.32 When considering applications for development within National Parks, the Broads and National Landscapes the conservation and enhancement of the landscape and scenic beauty should be given great 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 considerations245, and the impact of consenting or not consenting it upon the local economy;	N/A – The Scheme will not impact any National Parks, the Broads or National Landscapes.

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	• 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.	
	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 appropriate, reasonable 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.	
	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 the designation. 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.	
	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.	The **Design Approach Document** (Doc Ref. 7.3) demonstrates how the principles of 'good design' have been applied to the Scheme. Landscape mitigation is also described in the **Outline LEMP** (Doc Ref. 7.16). This has been considered in Section 12.7 Embedded Mitigation of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1) and referenced figures and appendices. The Applicant's assessment of the planning balance is set out within the **Planning Statement** (Doc Ref. 7.1). It reaches the conclusion that the residual landscape and visual impacts will be outweighed by urgent need for Scheme. This is consistent with the application of CNP policy as set out in 3.3.63 of EN-1.
	5.10.36 In reaching a judgement, the Secretary of State should consider whether any adverse impact is temporary, such as during construction, and/or whether any adverse impact on the landscape will be capable of being reversed in a timescale that the Secretary of State considers reasonable.	
	5.10.37 The Secretary of State should consider whether the project has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to minimise harm to the landscape, including by appropriate mitigation.	The **Design Approach Document** (Doc Ref. 7.3) demonstrates how the principles of 'good design' have been applied to the Scheme. Landscape mitigation is also described in the **Outline LEMP** (Doc Ref. 7.16). This has been considered in Section 12.7 Embedded Mitigation and Section 12.8 Assessment of Likely Effects of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1) and referenced figures and appendices.

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		ES Chapter 3: Alternatives and Design Evolution (Doc Ref. 6.1) describes how landscape and visual factors influenced siting decisions.
	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 **Design Parameters** (Doc Ref. 7.4) set out the maximum parameters of the Scheme that the detailed design is required to comply with as secured by Requirement 5 to the **Draft DCO** (Doc Ref. 3.1). This requirement also secures detailed design approval by the local planning authority. The **Outline LEMP** (Doc Ref. 7.16) which sets out the landscape mitigation for the Scheme is secured by Requirement 7 of the **Draft DCO** (Doc Ref. 3.1). This requirement also secures approval by the local planning authority.
5.11 Land use, including open space, green infrastructure and green belt		
Applicant Assessment	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.	This is considered in Section 14.6 Baseline Conditions and Section 14.8 Assessment of likely Significant Impacts and Effects of **ES Chapter 14: Socio-Economic and Land** Use (Doc Ref. 6.1).
	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).	Section 5.6 of **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1) and **ES Appendices 5-2 and 5-3** (Doc Ref. 6.3) provide a description of the agriculture and soils baseline including Agricultural Land Classification (ALC) assessment. Large parts of the Site and the surrounding area comprise Best and Most Versatile (BMV) agricultural land and, therefore, it has not been possible to avoid BMV land. Where practicable, areas of lower grades have been used. Further information is provided within **ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1) and the **Planning Statement** (Doc Ref. 7.1).
	5.11.13 Applicants should also identify any effects and seek to minimise impacts on soil health and protect and improve soil quality taking into account any mitigation measures proposed.	Impacts on soil health and quality have been considered within Section 5.8 of **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1).
	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.	Section 5.7 of **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1) describes the embedded mitigation established to avoid and minimise impacts on soils, including from contamination. These measures are set out in detail within the **OSMP** (Doc Ref. 7.14) and the **OutlineOutline CEMP** (Doc Ref. 7.10). The sustainable reuse of soils is also described in the **OSMP** (Doc Ref. 7.14).
	5.11.15 Developments should contribute to and enhance the natural and local environment by preventing new and existing developments from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability	The **Environmental Statement** (Doc Ref. 6.1) provides an assessment of effects of the Scheme including soil, air, water, and land. No new or existing developments would be put at risk or be adversely affected by the Scheme.

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	5.11.16 Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans.	**ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1) and **ES Chapter 14: Hydrology and Flood Risk** (Doc Ref. 6.1) take into account opportunities to improve local environmental conditions, including the consideration of information within river basin management plans.
	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.	**ES Appendix 5-4: Contaminated Land Assessment** (Doc Ref. 6.3) reports the likely presence and extent of any potential contamination-related risks associated with the Scheme. It concludes that the risk to construction workers and future site users and surface water as moderate/low.
	5.11.18 For developments on previously developed land, applicants should ensure that they have considered the risk posed by land contamination, and where contamination is present, applicants should consider opportunities for remediation where possible. It is important to do this as early as possible as part of engagement with the relevant bodies before the official pre-application stage.	
	5.11.19 Applicants should safeguard any mineral resources on the proposed site as far as possible, taking into account the long-term potential of the land use after any future decommissioning has taken place.	The Applicant has assessed the impact on the Mineral Safeguarding Area within the Order Limits in **ES Chapter 14: Socio-Economics and Land Use** (Doc Ref. 6.1) and **Appendix F: Mineral Safeguarding Assessment** (Doc Ref. 7.1).
	5.11.20 The general policies controlling development in the countryside apply with equal force in Green Belts but there is, in addition, a general presumption against inappropriate development within them. Such development should not be approved except in very special circumstances. Applicants should therefore determine whether their proposal, or any part of it, is within an established Green Belt and if it is, whether their proposal may be inappropriate development within the meaning of Green Belt policy (see paragraph 5.11.36 below).	N/A – The Scheme is not within the Green Belt.
	5.11.21 However, infilling or redevelopment of major developed sites in the Green Belt, if identified as such by the LPA, may be suitable for energy infrastructure. It may help to secure jobs and prosperity without further prejudicing the Green Belt or offer the opportunity for environmental improvement. Applicants should refer to relevant criteria on such developments in Green Belts.	
	5.11.22 Moreover an applicant may be able to demonstrate that particular energy infrastructure, such as an underground pipeline, may be considered an "engineering operation" and regarded as not inappropriate in Green Belt. This is provided it preserves the openness of the Green Belt and does not conflict with the purposes of Green Belt designation. It may also be possible for an applicant to show that the physical characteristics of a proposed overhead line in a particular location would not have so harmful an impact as to conflict with the purposes of Green Belt designation, or with other protections of rural landscape.	
Mitigation	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	The **Outline SMP** (Doc Ref. 7.14) sets out how loss of soil material and loss of soil functional capacity for supporting agricultural production will be avoided during construction, operation, and decommissioning of the Scheme.

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	design principles, including the layout of the project and the protection of soils during construction.	
	5.11.24 Where green infrastructure is affected, the Secretary of State should consider imposing requirements to ensure the functionality and connectivity of the green infrastructure network is maintained in the vicinity of the development and that any necessary works are undertaken, where possible, to mitigate any adverse impact and, where appropriate, to improve that network and other areas of open space including appropriate access to National Trails and other public rights of way and new coastal access routes.	The Applicant is seeking temporary possession and permanent rights across part of the common land at Martins Road as illustrated on the **Special Category Land Plans** (Doc Ref. 2.5). This strip of common land would continue to function as part of the green infrastructure network, and maintain connectivity for users and ecological movement. The provisions of Section 132 of the PA 2008 apply. As set out within the **Planning Statement** (Doc Ref. 7.1) and **Statement of Reasons** (Doc Ref. 4.1), it is concluded that the land when burdened with the right sought by the Applicant will be no less advantageous to the users of the common land. As a result, the requirement to undertake Special Parliamentary Procedure is not invoked and exchange land is not required. This is because: • The presence of overhead and underground cabling would not limit the use of the land as it would be at a height/depth that would not restrict users from walking, cycling or horse riding at those locations. • The presence of a new at-grade access would not present a barrier to users from continuing their journey along the strip of common land. The Applicant proposes the erection of signage for vehicles using the access point to ensure right of way is given to users of the common land. It is noted that similar access points exist at various points across the common land. This temporary possession would be controlled with access reinstated Functionality, accessibility and quality would be preserved. This demonstrates that the tests under Section 132 of the PA 2008 are met.
	5.11.25 The Secretary of State should also consider whether any adverse effect on green infrastructure and other forms of open space is adequately mitigated or compensated by means of any planning obligations, for example exchange land and provide for appropriate management and maintenance agreements. Any exchange land should be at least as good in terms of size, usefulness, attractiveness and quality, and accessibility.	
	5.11.26 Alternatively, where sections 131 and 132 of the Planning Act 2008 apply, replacement land provided under those sections will need to conform to the requirements of those sections.	
	5.11.27 Existing trees and woodlands should be retained wherever possible. Under the Environment Act 2021 the government set a legally binding target to increase the tree canopy and woodland cover to 16.5% of total land area of England by 2050. The Environmental Improvement Plan recognises the need to protect and increase tree canopy and woodland covers. 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. Where possible, projects should include the reuse of materials and use of sustainable materials such as timber, or recycled materials.	**ES Appendix 12-8: Arboricultural Impact Assessment** (Doc Ref. 6.3) considers the likely direct and indirect impacts to trees as a result of the Scheme and how impacts may be mitigated. Where practicable the detailed design will be developed to avoid or minimise impacts to trees and in practice this is likely to substantially reduce the level of arboricultural impacts reported. The final level of arboricultural impacts will be confirmed as part of an Arboricultural Method Statement and secured by the **Outline CEMP** (Doc Ref. 7.10).

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	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.	The Applicant has assessed the impact on the Mineral Safeguarding Area within the Order Limits in **ES Chapter 14: Socio-Economics and Land Use** (Doc Ref. 6.1) and **Appendix F: Mineral Safeguarding Assessment** (Doc Ref. 7.1). The Scheme encroaches into a very small proportion of the MSA, the deposits will not be permanently sterilised by the Scheme and can be extracted, if required, after its decommissioning (the design life of the Scheme is expected to be at least 40 years). The Solar Development Areas are also minimally invasive, and the proposals are not considered to affect the underlying geology. The frames supporting the solar panels would be driven at most 3.5m into the ground. The frames are fully removed (pulled out) on decommissioning. Overall, therefore, the Scheme would result in a negligible effect on MSA that is not significant.
	5.11.29 Where a project has a sterilising effect on land use (for example in some cases under transmission lines) there may be scope for this to be mitigated through, for example, using or incorporating the land for nature conservation or wildlife corridors or for parking and storage in employment areas.	
	5.11.30 Public Rights of way, National Trails, and other rights of access to land are important recreational facilities for example for walkers, cyclists and horse riders. The Secretary of State should expect applicants to take appropriate mitigation measures to address adverse effects on coastal access, National Trails, other rights of way and open access land and, where appropriate, to consider what opportunities there may be to improve or create new access. In considering revisions to an existing right of way, consideration should be given to the use, character, attractiveness, and convenience of the right of way.	The impacts on PRoW are set out in **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1). There will be two temporary closures of less than eight weeks and one managed crossing point during construction. A full summary of the proposed temporary management measures for PRoW, including possible diversions and crossing points, is included in the **Outline PRoW-MP** (Doc. Ref. 7.15). No significant adverse effects on PRoW are reported. The Scheme will include recreation and amenity improvements through the creation of a permissive path. This path will connect PRoW between Queens Bank and Shepeau Stow, following the boundary of the Settlement W of Cate's Cover Corner Scheduled Monument. The path will be suitable for pedestrian, cyclists and horse riders and provide information boards on the historic and natural environment of the surrounding area. The indicative alignment of the permissive path is shown in Annex A of the **Outline LEMP** (Doc Ref. 7.16).
	5.11.31 The Secretary of State should consider whether the mitigation measures put forward by an applicant are acceptable and whether requirements or other provisions in respect of these measures should be included in any grant of development consent.	

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Secretary of State decision making	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.	The Applicant has provided justification for siting the Scheme on BMV land within **Appendix D: Site Selection Report** (Doc Ref. 7.1) and **Design Approach Document** (Doc Ref. 7.3). Land use implications have been assessed and balanced alongside other environmental and technical constraints. ALC surveys have informed the iterative refinement of the SDA. The Scheme avoids impacts on the most extensive areas of Grade 1 land wherever practicable, and where development on BMV land is required, the design seeks to minimise permanent land take and maintain the potential for agricultural use between and around solar arrays. All three 132kV On-Site Substation Compounds are located on agricultural land classified as Grade 3b, which is not considered to be BMV. While the 400kV On-Site Substation Compound is sited on BMV land (a mix of Grades 1 and Grade 3a), alternative siting options were constrained by flood risk, electrical layout requirements, access and environmental sensitivities. The selected location is considered the most appropriate and deliverable option within the overall land use and environmental context. **ES Chapter 14: Socio-Economics and Land Use** (Doc Ref. 6.1) assess the economic effects to individual land holdings. It reports minor beneficial (not significant) effects on the voluntary change in land use and diversified income source within the Solar Development Area. Negligible to minor adverse (not significant) effects are reported in relation to the Grid Connection Route and Inter-Array Connections as a result of land take and disruption to farm holdings and agricultural production. The **Outline SMP** (Doc Ref. 7.14) sets out how loss of soil material and loss of soil functional capacity for supporting agricultural production will be avoided during construction, operation, and decommissioning of the Scheme.
5.12 Noise and Vibration		
Applicant Assessment	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;	A description of noise generating aspects of the Scheme, identification of noise sensitive receptors, and a prediction of how the noise environment will change with the Scheme in the short and long term during multiple periods of the day are highlighted in **ES Chapter 13: Noise and Vibration** (Doc Ref. 6.1). An assessment of the effect of predicted changes to the noise environment at noise sensitive receptors are summarised in Section 13.8 of **ES Chapter 13: Noise and Vibration** (Doc Ref. 6.1).

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	• 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; and at particular times of the day, evening and night (and weekends) as appropriate, and at different times of year. • an assessment of the effect of predicted changes in the noise environment on any noise-sensitive receptors, including an assessment of any likely impact on health and quality of life / wellbeing where appropriate, particularly among those disadvantaged by other factors who are often disproportionately affected by noise-sensitive areas; • if likely to cause disturbance, an assessment of the effect of underwater or subterranean noise; and • all reasonable steps taken to mitigate and minimise potential adverse effects on health and quality of life.	Measures to employ in mitigating noise are highlighted in Section 13.7 and 13.9 of **ES Chapter 13: Noise and Vibration** (Doc Ref. 6.1). Measures to mitigate noise during the construction and decommissioning stages are secured within the **Outline CEMP** (Doc Ref. 7.10) and the **Outline DEMP** (Doc Ref. 7.12). Measures to mitigate noise during the operation of the Scheme are secured within the **Outline OEMP** (Doc Ref. 7.11) and the **Design Parameters** (Doc Ref. 7.4).
	5.12.7 The nature and extent of the noise assessment should be proportionate to the likely noise impact.	A study area has been defined within which noise effects have been assessed (see Section 13.4 of **ES Chapter 13: Noise and Vibration** (Doc Ref. 6.1) which is considered proportionate to the likely noise impact.
	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.	An assessment of the noise impact of ancillary activities is scoped out
	5.12.9 Operational noise, with respect to human receptors, should be assessed using the principles of the relevant British Standards262 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 noise and vibration assessment methodology is presented in Section 13.4 of **ES Chapter 13: Noise and Vibration** (Doc Ref. 6.1). Reference is made to NPS EN-3, which relates to renewables. The construction noise assessment methodology makes reference to guidance in BS 5228-1 and the operational assessment methodology makes reference to BS 4142.
	5.12.10 Some noise impacts will be controlled through environmental permits and parallel tracking is encouraged where noise impacts determined by an environmental permit interface with planning issues (i.e. physical design and location of development). The applicant should consult the EA and/or the SNCB, and other relevant bodies, such the MMO or NRW, as necessary, and in particular regarding assessment of noise on protected species or other wildlife. The results of any noise surveys and predictions may inform the ecological assessment. The	Noted.

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	seasonality of potentially affected species in nearby sites may also need to be considered.	
	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.	Assessment of noise and vibration effects is presented in Section 13.8 of **ES Chapter 13: Noise and Vibration** (Doc Ref. 6.1). Measures to employ in mitigating construction and operational noise are highlighted in Section 13.7 and 13.9 of **ES Chapter 13: Noise and Vibration** (Doc Ref. 6.1). These measures are secured through the **Outline CEMP** (Doc Ref. 7.10), **Outline OEMP** (Doc Ref. 7.11) and the **Outline DEMP** (Doc Ref. 7.12).
Mitigation	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	Measures to employ in mitigating construction and operational noise are highlighted in Section 13.7 and 13.9 of **ES Chapter 13: Noise and Vibration** (Doc Ref. 6.1). These measures are secured through the **Outline CEMP** (Doc Ref. 7.10).
	5.12.14 Mitigation measures may include one or more of the following: • engineering: reducing the noise generated at source and/or containing the noise generated; • lay-out: where possible, optimising the distance between the source and noise sensitive receptors and/or incorporating good design to minimise noise transmission through the use of screening by natural or purpose-built barriers, or other buildings; • administrative: using planning conditions/obligations to restrict activities allowed on the site at certain times and/or specifying permissible noise limits/noise levels, differentiating as appropriate between different times of day, such as evenings and late at night, and taking into account seasonality of wildlife in nearby designated sites; and • insulation: mitigating the impact on areas likely to be affected by noise including through noise insulation when the impact is on a building.	Measures to employ mitigating construction and operational noise are highlighted in Section 13.7 and 13.9 of **ES Chapter 13: Noise and Vibration** (Doc Ref. 6.1). These measures consider how noise can be reduced through engineering and lay-out, which are relevant to a solar farm. These measures are secured through the **Outline CEMP** (Doc Ref. 7.10), **Outline OEMP** (Doc Ref. 7.11) and the **Outline DEMP** (Doc Ref. 7.12).
	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).	Measures to employ in mitigating construction and operational noise are highlighted in Section 13.7 and 13.9 of **ES Chapter 13: Noise and Vibration** (Doc Ref. 6.1). Of the options considered for the Grid Connection Route, the Applicant selected the shorter route which has a greater separation distance from residential properties which was preferable from a noise and vibration perspective. The **Outline OEMP** (Doc Ref. 7.11) secures embedded mitigation measures relating to noise and vibration, including: • The potential for the use of low noise equipment, where reasonably practicable, is one

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		of the criteria evaluated when determining appropriate equipment for use on the Solar Development Areas; • The location and orientation of Solar Stations and substations, inverters, transformers and cooling fans have been placed away from large concentrations of receptors such that operational noise emissions from electrical equipment are less impactful. There is a commitment to locate solar stations and the Substation and BESS Compounds at least 250 m from residential properties (see **Design Parameters** (Doc Ref. 7.4) and **Works Plans** (Doc Ref. 2.3)); and • Transformers may be standalone units or pre-assembled with inverters and switchgear to form a single contained unit (i.e. they are enclosed).
	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.	Relevant sections of the NPSE and NPFF are duly considered and applied in assessment methodology set out in Section 13.4 **of ES Chapter 13: Noise and Vibration** (Doc Ref. 6.1). Compliance with these three aims of the NPSE is set out in Section 13.7 and 13.9 of **ES Chapter 13: Noise and Vibration** (Doc Ref. 6.1).
Secretary of State decision making	5.12.17 The Secretary of State should not grant development consent unless they are satisfied that the proposals will meet the following aims, through the effective management and control of noise: • avoid significant adverse impacts on health and quality of life from noise; • mitigate and minimise other adverse impacts on health and quality of life from noise; and • where possible, contribute to improvements to health and quality of life through the effective management and control of noise.	While the Scheme would result in significant adverse noise effects during the construction and decommissioning phases, all reasonably practicable measures have been applied to avoid and reduce the impacts on nearby receptors in line with the first and second aims of the NPSE and paragraph 5.12.17 of EN-1
	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.	Measures to control construction or decommissioning phase noise are defined in Annex B of BS 5228-1 and measures to control construction or decommissioning phase vibration are defined in Section 8 of BS 5228-2. These embedded measures represent Best Practicable Means (BPM) (as defined in Section 72 of the Control of Pollution Act 1974) and are secured within the **Outline CEMP** (Doc Ref. 7.10) and the **Outline DEMP** (Doc Ref. 7.12), which are secured by the DCO requirements. Mitigation measures relating to the operational phase are secured within the **Outline OEMP** (Doc Ref. 7.11).
5.13 Socio-Economic Impacts		
Applicant Assessment	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).	This is considered in Section 14.8 Assessment of Likely Significant Impacts and Effects of **ES Chapter 14: Socio-Economics and Land Use** (Doc Ref. 6.1)
	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.	A record of engagement with stakeholders, including local planning authorities, is presented in Section 14.3 of **ES Chapter 14: Socio-Economics and Land Use** (Doc Ref. 6.1).

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	5.13.4 The applicant's assessment should consider all relevant socio-economic impacts, which may include: • the creation of jobs and training opportunities. Applicants may wish to provide information on the sustainability of the jobs created, including where they will help to develop the skills needed for the UK's transition to Net Zero the contribution to the development of low-carbon industries at the local and regional level as well as nationally; • the provision of additional local services and improvements to local infrastructure, including the provision of educational and visitor facilities; • any indirect beneficial impacts for the region hosting the infrastructure, in particular in relation to use of local support services and supply chains; • effects (positive and negative) on tourism and other users of the area impacted; • the impact of a changing influx of workers during the different construction, operation and decommissioning phases of the energy infrastructure. This could change the local population dynamics and could alter the demand for services and facilities in the settlements nearest to the construction work (including community facilities and physical infrastructure such as energy, water, transport and waste). There could also be effects on social cohesion depending on how populations and service provision change as a result of the development; and • cumulative effects - if development consent were to be granted for a number of projects within a region and these were developed in a similar timeframe, there could be some short-term negative effects, for example a potential shortage of construction workers to meet the needs of other industries and major projects within the region	This is considered in Section 14.8 Assessment of Likely Significant Impacts and Effects and Section 14.11 Cumulative Effects of **ES Chapter 14: Socio-Economics and Land Use** (Doc Ref. 6.1) Further information on training and employment opportunities can be found in the **Outline Skills, Supply Chain and Employment Plan** (Doc Ref. 7.17).
	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 Chapter 14: Socio-Economics and Land Use** (Doc Ref. 6.1) includes an assessment and summary of the baseline conditions at the Site. The local planning policies have also been considered and a summary of these are available within **ES Appendix 14-1: Socio-Economics and Land Use Legislation, Policy and Guidance** (Doc Ref. 6.3).
	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.	Other relevant environmental topics have been taken into account in the assessment presented in Section 14.8 Assessment of Likely Significant Impacts and Effects of **ES Chapter 14: Socio-Economics and Land Use** (Doc Ref. 6.1). The Applicant will consider local suppliers in the supply chain, as set out within the **Outline Skills, Supply Chain and Employment Strategy** (Doc Ref. 7.17).
	5.13.7 Applicants should consider developing accommodation strategies where appropriate, especially during construction and decommissioning phases, that	This is considered in Section 14.7 Embedded Mitigation of **ES Chapter 14: Socio-Economics and Land Use** (Doc Ref. 6.1). The assessment does not identify a requirement for a specific accommodation strategy.

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	would include the need to provide temporary accommodation for construction workers if required.	
Mitigation	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.	This is considered in Section 14.7 Embedded Mitigation and Section 14.9 Assessment of Likely Significant Impacts and Effects of **ES Chapter 14: Socio-Economics and Land Use** (Doc Ref. 6.1). No design-related measures were considered necessary.
Secretary of State decision making	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.	Section 14.8 Assessment of Likely Significant Impacts and Effects of **ES Chapter 14: Socio-Economics and Land Use** (Doc Ref. 6.1). Calculations regarding Gross Value Added (GVA) are set out within the ES Chapter.
	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).	
	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.	This is considered in Section 14.7 Embedded Mitigation and Section 14.9 Additional Monitoring, Mitigation and Enhancement Measures of **ES Chapter 14: Socio-Economics and Land Use** (Doc Ref. 6.1).
	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.	An **Outline Skills, Supply Chain and Employment Plan** (Doc Ref. 7.17) has been prepared to support the DCO Application. A detailed Skills, Supply Chain and Employment Plan would be developed post-consent and require approval by the relevant planning authority before its implementation, as secured by the **Draft DCO** (Doc Ref. 3.1).
5.14 Traffic and Transport		
Applicant assessment	5.14.5 If a project is likely to have significant transport implications, the applicant's ES (see Section 4.3) should include a vision for transport and an assessment of potential transport impacts.	An assessment of the transport impacts of the Scheme is included in Section 15.8 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1) This assessment has been undertaken in accordance with TAG guidelines.
	5.14.6 The DfT's Transport Analysis Guidance (TAG) and Welsh Governments WelTAG provides guidance on modelling and assessing the impacts of transport schemes.	
	5.14.7 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, including any reasonable future tested scenarios and mitigation to inform the application to be submitted.	Section 15.3 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1) outlines the consultation and engagement carried out to date with National Highways (NH) and Lincolnshire County Council (LCC) as the local highway authority.
	5.14.8 The applicant should prepare a travel plan adopting a vision-led approach to identify demand management and monitoring and fall-back measures that proactively mitigate transport impacts by providing details of proposed measures to improve access by active, public and shared transport to:	An **Outline CTMP** (Doc Ref. 7.13) is submitted with the DCO application and Section 15.7 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1) outlines the embedded mitigation measures, including those designed to encourage construction workers to travel by sustainable modes or to car share, which have been incorporated into the Scheme design.

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	• reduce the need for parking associated with the proposal; • contribute to decarbonisation of the transport network; and • improve user travel options by offering genuine modal choice	
	5.14.9 The assessment should also consider any possible disruption to services and infrastructure (such as road, rail and airports).	Section 15.8 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1) forecasts impacts on the road network as a result of the Scheme during the construction (and decommissioning) phase. The Scheme is not expected to result in any disruption to other local services or infrastructure such as rail services.
	5.14.10 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.	No additional transport infrastructure is required to mitigate the Scheme, beyond the provision of new access points to accommodate construction and operational traffic. All construction compounds will include safe pedestrian routes, cycle parking and welfare facilities to enhance active transport provision. In accordance with the **Outline CTMP** (Doc Ref. 7.13), the final CTMP prepared by the contractor post-DCO consent will include further detail on proposed highway improvements such as carriageway widening.
	5.14.11 Applicants should discuss with network providers the possibility of co-funding by government for any third-party benefits. Guidance has been issued which explains the circumstances where this may be possible, although the government cannot guarantee in advance that funding will be available for any given uncommitted scheme at any specified time.	Section 15.3 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1) provides a record of engagement with key stakeholders regarding traffic and access prior to the submission of the DCO Application. The assessment does not identify any need for the co-funding of transport infrastructure.
Mitigation	5.14.12 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 CTMP** (Doc Ref. 7.13) has been produced to **support ES Chapter 15: Traffic and Access** (Doc Ref. 6.1). Section 15.7 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1) outlines the embedded mitigation measures proposed to support the Scheme.
	5.14.13 If feasible and operationally reasonable, such mitigation should be required, before considering requirements for the provision of new inland transport infrastructure to deal with remaining transport impacts. All stages of the project should support and encourage a modal shift of freight from road to more environmentally sustainable alternatives, such as rail, cargo bike, maritime and inland waterways, as well as making appropriate provision for and infrastructure needed to support the use of alternative fuels including charging for electric vehicles.	Details on embedded and detailed mitigation are provided in sections 15.7 and 15.9 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1) and in the **Outline CTMP** (Doc Ref. 7.13). The assessment does not identify the need to consider alternative transport infrastructure.

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	5.14.14 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.	Mitigation measures pertaining to freight and HGVs are outlined in sections 15.7 and 15.9 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1). Management measures for HGVs are also detailed in the **Outline CTMP** (Doc Ref. 7.13) which would control the routing of these vehicles (including AILs).
	5.14.15 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.	
Secretary of State decision making	5.14.19 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.	The potential traffic impacts of the Scheme have been evaluated in Section 15.8 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1). This assessment indicates that, with the embedded and detailed mitigation measures outlined in sections 15.7 and 15.9 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1), the Scheme is not expected to result in any significant effects with respect to Traffic and Access on its own.
	5.14.20 Where the proposed mitigation measures are insufficient to reduce the impact on the transport infrastructure to acceptable levels, the Secretary of State should consider requirements to mitigate adverse impacts on transport networks arising from the development, as set out below.	The Applicant considers the proposed mitigation measures as set out with **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1) are sufficient, with no residual significant adverse effects reported. The cumulative effects assessment reports the potential for moderate significant adverse effect in relation to road safety. In practice this is unlikely to occur as it requires the peaks of the construction phases to coincide. Furthermore, the provisions of the **Outline CTMP** (Doc Ref. 7.13) and the Requirements of the **Draft DCO** (Doc Ref. 3.1) enable additional management to be applied if necessary.
	5.14.21 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.	No new transport infrastructure is proposed as part of the Scheme, since there are no significant impacts which require mitigation.
	5.14.22 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	Section 15.8 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1) shows that no significant residual effects are expected as part of the scheme, including on highway safety. The cumulative effects assessment reports the potential for moderate significant adverse effect in relation to road safety. In practice this is unlikely to occur as it requires the peaks of the

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	show how consideration has been given to the provision of adequate active public or shared transport access and provision.	construction phases to coincide. Furthermore, the provisions of the **Outline CTMP** (Doc Ref. 7.13) and the Requirements of the **Draft DCO** (Doc Ref. 3.1) enable additional management to be applied if necessary. The **Outline Public Rights of Way Management Plan (PRoW-MP)** (Doc. Ref. 7.15) outlines how local PRoW and Common Land will be impacted by the Scheme and how these impacts will be managed and mitigated. No unacceptable impacts are reported in the assessment and therefore consent should not be refused on this basis.
5.15 Resource and Waste Management		
Applicant Assessment	5.15.6 Applicants must ensure that all proposals align with circular economy objectives. In England, applicants must demonstrate that development proposals are in line with Defra's policy statement on the role of EfW in treating residual waste.	Waste management is considered in **ES Chapter 16: Other Environmental Topics, Section 16.6: Materials and Waste** (Doc Ref. 6.1). A Site Waste Management Plan will be produced by the contractor prior to construction, in accordance with the **Outline Site Waste Management Plan** (oSWMP) (Doc Ref. 7.19) submitted with the DCO Application. Further details of how materials and waste would be managed have been provided in the **Outline CEMP**) (Doc Ref. 7.10) and **Outline DEMP** (Doc Ref. 7.12) which are submitted as part of the DCO Application. An assessment of the impacts of the waste arising from the Scheme on the capacity of waste management facilities (specifically landfill capacity as per the ISEP (formerly IEMA) Guide to: Materials and Waste in Environmental Impact Assessment, Guidance for a Proportionate Approach to deal with other waste arising in the area for at least five years of operation is considered in **ES Chapter 16: Other Environmental Topics, Section 16.6: Materials and Waste** (Doc Ref. 6.1).
	5.15.7 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.	
	5.15.8 The arrangements described and a report setting out the sustainable management of waste and use of resources should include information on how re-use and recycling will be maximised in addition to the proposed waste recovery and disposal system for all waste generated by the development. They should also include an assessment of the impact of the waste arising from development on the capacity of waste management facilities to deal with other waste arising in the area for at least five years of operation.	
	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	
	5.15.10 If the applicant's assessment includes dredged material, the assessment should also include other uses of such material before disposal to sea, for example through re-use in the construction process.	
	5.15.11 The UK is committed to transitioning to a circular economy, a future where resources are kept in use for longer, and waste is reduced; we accelerate the path to net zero, we see investment in critical infrastructure and green jobs, our economy prospers, and nature thrives. 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.	

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	5.15.12 Applicants are also encouraged to prepare a construction 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.	
Secretary of State decision making	5.15.13 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.	
	5.15.14 The Secretary of State should be satisfied that: • any such waste will be properly managed, both on-site and off-site. • the waste from the proposed facility can be dealt with appropriately by the waste infrastructure which is, or is likely to be, available. Such waste arisings should not have an adverse effect on the capacity of existing waste management facilities to deal with other waste arisings in the area; and • adequate steps have been taken to give consideration to the circular economy, 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.	
	5.15.15 Where necessary, the Secretary of State should use requirements or obligations to ensure that appropriate measures for waste management are applied.	
	5.15.16 The Secretary of State may wish to include a condition on revision of waste management plans at reasonable intervals when giving consent.	
	5.15.17 Where the project will be subject to the Environmental Permitting regime, waste management arrangements during operations will be covered by the permit and the considerations set out in Section 4.12 will apply.	
	5.15.18 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 and circular economy objectives.	
5.16 Water Quality and Resources		
Applicant Assessment	5.16.3 Where the project is likely to have effects on the water environment, the applicant should undertake an assessment of the existing status of, and impacts of the proposed project on, water quality, water resources and physical characteristics of the water environment, and how this might change due to the impact of climate change on rainfall patterns and consequently water availability across the water environment, as part of the ES or equivalent (see Section 4.3 and 4.10)	An assessment of impacts on the water environment (including water quality, hydrogeology, hydro morphology, water resources and flood risk) is presented in **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1).

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	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.	All consultation has been recorded and summarised within the **Consultation Report** (Doc Ref. 5.1), including the early contact made with local authority, the EA and water companies to address these matters.
	5.16.5 Where appropriate, applicants should 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.	All measures to mitigate the effects of the construction phase are outlined within the **Outline CEMP** (Doc Ref. 7.10) and **ES Appendix 11-4: Outline Drainage Strategy** (Doc Ref. 6.3). It requires the treatment of surface water runoff impermeable areas to pass the 'Simple Index Approach' for three pollutants (Total Suspended Solids, Metals and Hydrocarbons). The proposed swales surrounding the infrastructure are sufficient to treat the runoff from these areas during operation.
	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.	There are no Source Protection Areas or groundwater locations within or near to the Order Limits.
	5.16.7 The ES should in particular describe: • the existing quality of waters affected by the proposed project and the impacts of the proposed project on water quality, noting any relevant existing discharges, proposed new discharges and proposed changes to discharges; • existing water resources affected by the proposed project and the impacts of the proposed project on water resources, noting any relevant existing abstraction rates, proposed new abstraction rates and proposed changes to abstraction rates (including any impact on or use of mains supplies and reference to Abstraction Licensing Strategies) and also demonstrate how proposals minimise the use of water resources and water consumption in the first instance; • existing physical characteristics of the water environment (including quantity and dynamics of flow) affected by the proposed project and any impact of physical modifications to these characteristics; • any impacts of the proposed project on water bodies or protected areas (including shellfish protected areas) under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 and source protection zones (SPZs) around potable groundwater abstractions; • how climate change could impact any of the above in the future; and	An assessment of impacts on the water environment (including water quality, hydrogeology, hydro morphology, water resources and flood risk) are presented in **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1) This includes a cumulative effects assessment. **ES Appendix 11-2: Water Framework Directive Report** (Doc Ref. 6.3) has been undertaken and presented within the ES.

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	• any cumulative effects.	
Mitigation	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 are included within **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1) and detailed within the **Outline CEMP** (Doc Ref. 7.10), **ES Appendix 11-4: Outline Drainage Strategy** (Doc Ref. 6.3), **Outline OEMP** (Doc Ref. 7.11) and **Outline DEMP** (Doc Ref. 7.12) for each of the Scheme phases. All of which are secured within the Schedule 2 Requirements to the **Draft DCO** (Doc Ref. 3.1). The Applicant does not propose to abstract water. During construction, it is not proposed to have a permanent connection to mains water during the construction, unless otherwise agreed by Anglian Water (mains water supplier). The provision for water supply will be from commercial sources with dedicated clean water tanks provided to supply the various temporary welfare facilities. Given the temporary nature of the demand, it is anticipated that the Scheme will not result in any significant changes to the water stress. During operation, no local water abstraction is proposed. Given the relatively small potable water demand and since water supply is a regulated industry, no further assessment is proposed. Anglian Water will be consulted post-DCO consent to review options for mains connection. However, if this is not possible, an alternative commercial potable water supply will be considered with static tanks incorporated into the buildings.
	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.	
	5.16.10 The risk of impacts on the water environment can be reduced through careful design to facilitate adherence to good pollution control practice. For example, designated areas for storage and unloading, with appropriate drainage facilities, should be clearly marked	
	5.16.11 The impact on local water resources can be minimised through planning and design for the efficient use of water, including water recycling. If a development needs new water infrastructure, significant supplies or impacts other water supplies, the applicant should consult with the local water company and the EA or NRW	
Secretary of State decision making	5.16.12 Activities that discharge to the water environment are subject to pollution control. The considerations set out in Section 4.12 on the interface between planning and pollution control therefore apply. These considerations will also apply in an analogous way to the abstraction licensing regime regulating activities that take water from the water environment, and to the control regimes relating to works to, and structures in, on, or under controlled waters.	An assessment of impacts on the water environment (including water quality, hydrogeology, hydromorphology, water resources and flood risk) is presented in **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1). This includes a cumulative effects assessment. **ES Appendix 11-2: Water Framework Directive Report** (Doc Ref. 6.3) has been undertaken and presented within the ES. It concludes that that there would not be a deterioration in WFD status of water bodies. The risks of WFD impacts are low, due to the low quality and low sensitivity of watercourses which have the potential to be affected, and it is likely that all WFD risks have be designed out or are mitigated. However, once detailed designs affecting water bodies including appropriate mitigation measures are confirmed (at the post consent, detailed design stage), it is proposed that the WFD Impact Assessment is reviewed to ensure that proposed mitigation measures remain adequate and WFD compliance is maintained.
	5.16.13 The Secretary of State will need to give impacts on the water environment more weight where a project would have an adverse effect on the achievement of the environmental objectives established under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017.	
	5.16.14 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 the policies set out in the Government's Environmental Improvement Plan.	
	5.16.15 The Secretary of State should be satisfied that a proposal has regard to current River Basin Management Plans and meets the requirements of the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (including regulation 19). The specific objectives for particular river basins are set out in River Basin Management Plans. The Secretary of State must refuse development consent where a project is likely to cause deterioration of a water	

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	body or its failure to achieve good status or good potential, unless the requirements set out in Regulation 19 are met. A project may be approved in the absence of a qualifying Overriding Public Interest test only if there is sufficient certainty that it will not cause deterioration or compromise the achievement of good status or good potential.	
	5.16.16 The Secretary of State should also consider the interactions of the proposed project with other plans such as Water Resources Management Plans and Shoreline Management Plans.	Mitigation required to ensure the protection of the water environment are outlined in **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1). Mitigation measures are included within **ES Chapter 11: Hydrology and Flood Risk** (Doc Ref. 6.1) and detailed within the **Outline CEMP** (Doc Ref. 7.10), **ES Appendix 11-4: Outline Drainage Strategy** (Doc Ref. 6.3), **Outline OEMP** (Doc Ref. 7.11) and **Outline DEMP** (Doc Ref. 7.12) for each of the Scheme phases. All of which are secured within the Schedule 2 Requirements to the **Draft DCO** (Doc Ref. 3.1).
	5.16.17 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.	

2. National Policy Statement for Renewable Energy Infrastructure (EN-3)

2.1.1. Table 2-1 below details the policies within the National Policy Statement for Renewable Energy Infrastructure (EN-3) (December 2025). Policies which are not relevant to the Scheme are not included within this table.

Table 2-1 Relevant Policies within EN-3

Part	EN-3 Policy Text	Assessment
2.3 Factors Influencing site selection and design National designations	2.3.6 When considering applications for CNP Infrastructure in sites with nationally recognised designations (such as SSSIs, National Nature Reserves, National Parks, the Broads, Areas of Outstanding Natural Beauty, Registered Parks and Gardens, and World Heritage Sites), the Secretary of State will take as the starting point that the relevant tests in Sections 5.4 and 5.10 of EN-1 have been met, and any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by the urgent need for this type of infrastructure.	The **Environmental Statement** (Doc Ref. 6.1) does not report any significant adverse effects on nationally recognised designations as listed in paragraph 2.3.6. The ES Chapters take into account the aims, goals and targets set out in the Environmental Improvement Plan, as set out in the Legislation, Policy and Guidance appendix to each chapter. The Applicant has provided as assessment of harm to heritage assets within **Appendix E: Heritage Statement of Harm** (Doc Ref. 7.1). It concludes that the Scheme would not result in substantial harm or total loss to any designated heritages assets (or equivalent).
	2.3.7 The Secretary of State should have regard to the aims, goals and targets (including targets set under the Environment Act 2021) of the government's Environmental Improvement Plan (of which the 25 Year Environment Plan is the first), and other existing and future measures and targets in England, as well as Welsh policy, such as the Wales National Marine Plan, Planning Policy Wales and Technical Advice Note (TAN) 5, the Wellbeing of Future Generations Wales Act and compliance with the Environment Act 2021.	
	2.3.8 In considering the impact on the historic environment as set out in Section 5.9 of EN-1 and whether the Secretary of State is satisfied that the substantial public benefits would outweigh any loss or harm to the significance of a designated heritage asset, the Secretary of State should take into account the positive role that large-scale renewable projects play in the mitigation of climate change, the delivery of energy security and the urgency of meeting the net zero target.	
Other locational Considerations	2.3.9 As most renewable energy resources can only be developed where the resource exists and where economically feasible, and because there are no limits on the need established in Part 3 of EN-1, the Secretary of State should not use a consecutive approach in the consideration of renewable energy projects (for example, by giving priority to the re-use of previously developed land for renewable technology developments).	The Applicant's approach to site selection is set out in **Appendix D: Site Selection Report** (Doc Ref. 7.1). It takes into account the technical requirements specific to solar renewable energy projects.
2.4 Climate Change Adaptation	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	Section 7.8 of **ES Chapter 7: Climate Change** (Doc Ref. 6.1) and **ES Appendix 7.2: Climate Change Risk Register** (Doc Ref. 6.3) contain a climate change risk assessment, considering the impact of changing climate change conditions on the Scheme, including the increased risk of flooding and impact of higher temperatures. Further information is also provided within **ES Appendix 11.3: Flood Risk Assessment** (Doc Ref. 6.1).

Part	EN-3 Policy Text	Assessment
2.5 Consideration of good design for infrastructure	2.5.1 Section 4.7 of EN-1 sets out the criteria for good design that should be applied to all energy infrastructure.	The **Design Approach Document** (Doc Ref. 7.3) demonstrates how the design of the Scheme has been developed in accordance with clear design framework, based on the criteria for good design set out in EN-1. This has included the adoption of project level design principles to guide decision making and embed good design outcomes to the Scheme. These design principles have evolved throughout the design process, being informed and refined by stakeholder engagement, consultation feedback, technical studies and environmental assessments. They have been used to steer and influence the design of the Scheme to avoid and reduce adverse impacts wherever practicable, make the most of the opportunities for enhancement and balance the need for flexibility and certainty within the DCO Application. Throughout the design process, the Applicant has maintained an interdisciplinary approach to design and considered both the opportunities and constraints of the Scheme. This included analysis of the existing physical, environmental, social and cultural context of the Site by a broad range of technical disciplines (including landscape and visual, noise, ecology and heritage) as set out and assessed by **ES Chapters 5-16** (Doc Ref. 6.1). This approach has enabled the Applicant to understand the complexities of the Site and identify where multiple opportunities and constraints have the potential to stack up with one another to provide a good design response and allow for co-existence and co-location with other terrestrial uses. **ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1) sets out the alternatives considered by the Applicant during the design development process. As a result of the design approach adopted by the Applicant, the Scheme would deliver a number of environmental, social and economic benefits in addition to the generation of secure, low cast, decarbonised, clean, renewable energy. These include significant areas of new habitats that respect and enhance features within the landscape, delivering a Biodiversity Net Gain and improvements in ecological connectivity.
	2.5.2 Proposals for renewable energy infrastructure should demonstrate good design, particularly in respect of landscape and visual amenity, opportunities for co-existence/co-location with other marine and terrestrial uses, and in the design of the project to mitigate impacts such as noise and effects on ecology and heritage.	
2.6 Flexibility in the project details	2.6.1 Where details are still to be finalised, applicants should explain in the application which elements of the proposal have yet to be finalised, and the reason why this is the case.	The Applicant seeks to retain a proportionate degree of flexibility regarding the design detail of certain components of the Scheme. The extent of flexibility required is described and justified in **ES Chapter 2: The Scheme** (Doc Ref. 6.1), the **Design Approach Document** (Doc Ref. 7.3) and **Design Parameters** (Doc Ref. 7.4).
	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.	

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	2.6.3 Full guidance on how applicants and the Secretary of State should manage flexibility is set out in Section 4.3 of EN-1.	With the above need for flexibility in mind, the Applicant confirms that the ES has adopted the Rochdale Envelope approach and assessed the likely worst-case development scenario. Establishing the maximum parameters enables a robust assessment of likely significant environmental effects to be undertaken within this ES for topics where the nature of assessment requires a specific level of detail, such as maximum heights, massing or noise levels. Thus, the assessment parameters form the basis of the assessment. The assessment parameters are detailed in the works descriptions which are linked to Schedule 1 within the **Draft DCO** (Doc Ref. 3.1) and the **Design Parameters** (Doc Ref. 7.4).
2.10 Solar Photovoltaic Generation Applicant Assessment – Irradiance and site topography	2.10.11 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.	As detailed in **Planning Statement Appendix 4: Site Selection Report** (Doc Ref. 7.1), the location of the Scheme was chosen partly because of the characteristics of the land in this part of Lincolnshire are optimal for the generation of renewable energy by solar PV. The land at this location has good levels of irradiation and large areas of flat land. This increases the likelihood of being able to identify a suitable site capable of producing a large amount of electricity. Due to fast-evolving pace of solar PV technology, the Scheme allowed flexibility to be able to choose specific technology closer to the construction within the parameters defined in the **Draft DCO** (Doc Ref. 3.1) and the **Design Approach Document** (7.3) and **Design Principles** (Doc Ref. 7.4). This will support enabling the optimum production of renewable energy within the Scheme. As detailed in the **ES Chapter 2: The Scheme** (Doc Ref. 6.1), the mounting structure of the Solar PV modules will be designed to face southwards on a fixed platform. The Solar PV modules would be angled at a tilt of 10 to 25 degrees from horizontal to optimise the daylight absorption. The **ES** (Doc Ref. 6.1) takes account of the impacts of Solar PV modules facing southwards on a fixed platform.
	2.10.12 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	
Applicant Assessment - Network Connection	2.10.13 Applicants should consider important issues relating to network connection at Section 4.11 of EN-1 and in EN-5. In particular, and where appropriate, applicants should proceed in a manner consistent with the regulatory regime for offshore transmission networks established by Ofgem, details of which are set out in EN-5.	The Applicant has submitted a **Grid Connection Statement** (Doc Ref. 7.5) which provides details of how the Scheme will be connected to the NETS. The scope of this DCO Application includes the necessary electricity transmission infrastructure to connect the Scheme to the Weston Marsh B Substation. The nominal voltage of the connection is 400kV which has influenced the technology selection for delivering the grid connection. The cumulative impact of the Scheme with other energy generating stations and infrastructure is included in each topic-specific ES Chapter (Doc Ref. 6.1).
	2.10.14 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.	

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	2.10.15 Larger developments may seek connection to the transmission network if there is available network capacity and/or supportive infrastructure.	
	2.10.16 In either case the connection voltage, availability of network capacity, and the distance from the solar farm to the existing network can have a significant effect on the commercial feasibility of a development proposal.	
	2.10.17 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.	
	2.10.18 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.	
Applicant Assessment – Proximity of site to dwelling	2.10.19 Utility-scale solar farms are large sites that may have a significant zone of visual influence. The two main impact issues that determine distances to sensitive receptors are therefore likely to be visual amenity and glint and glare. These are considered in Landscape, Visual and Residential Amenity (paragraphs 2.10.84-2.10.92) and Glint and Glare (paragraphs 2.10.93 – 2.10.97) impact sections below.	The response to these matters is set out in the corresponding policies further below.
Applicant Assessment – Agriculture Land Classification and Land type	2.10.20 Solar is a highly flexible technology and as such can be deployed on a wide variety of land types.	**Planning Statement Appendix 4: Site Selection Report** (Doc Ref. 6.1) explains the Applicant's approach to selection of an appropriate site to take forward as part of an application for a NSIP scale solar project. The Applicant has considered previously developed and brownfield land, however, the majority of land near the PoC is undeveloped and agricultural. There is no brownfield land reasonably available that is of a size that could accommodate NSIP scale solar development. The Predictive Land Assessment tools shows BMV land is likely to be in abundance in all areas surrounding the Point of Connection (PoC). There is no land of sufficient scale for a 750 MW solar farm which does not have a high likelihood of BMV land, making complete avoidance of BMV agricultural land impossible for the Scheme. Having regard to the factors influencing site selection outlined in EN-3, the Applicant has sought to identify land for development outside of Grade 1 agricultural land as outlined within **Appendix D: Site Selection Report** (Doc Ref. 7.1). Following identification of land for the Order Limits and detailed soil surveys, the Applicant has sought to prioritise development, particularly that which includes hard standing, on areas of lower grade land where possible practicable in line with paragraph 2.10.21 of EN-3. For example, in areas where Grade 1 ALC land was present, solar panels were relocated within the Site to respond to other constraints present such as the presence
	2.10.21 While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise 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).	
	2.10.22 Whilst the development of ground mounted solar arrays is not prohibited on agricultural land classified 1, 2 and 3a, 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 2.10.67-84 and 2.10.99 – 2.10.118 of this NPS.	
	2.10.23 It is recognised that at this scale, it is likely that applicants' developments may use some agricultural land. Applicants should explain their choice of site, noting the preference for development to be on brownfield, industrial and low and medium grade agricultural land.	
	2.10.24 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.	

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	2.10.25 The 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. Applicants should refer to Natural England guidance, or any successor to it, for more information about the assessment process for development proposals on agricultural land.	of Flood Zone 3b with Land Parcel B. Where slivers of Grade 1 ALC land were identified within Land Parcels A and B, it was not considered that their avoidance would provide viable parcels of land for arable use, due to their size and shape. Furthermore, it was not considered possible to relocate the 400kV On-Site Substation and BESS Compound to fully avoid Grade 1 ALC land, as its location is determined by the route of the Grid Connection. Grade 1 ALC land identified within Land Parcel C was excluded from physical development and defined as a habitat management area. **ES Chapter 5: Agriculture and Soils** (Doc Ref. 6.1) assesses the impact of the Scheme on agricultural land, with the **Outline Soil Management Plan** (Doc Ref. 7.14) setting out the Scheme's embedded mitigation measures, and principles on how the soils will be managed and protected during construction, operation and decommissioning of the Scheme.
	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	
Applicant Assessment – Accessibility	2.10.27 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.	Proximity to the Major Road Network was considered at the outset with the majority of land within proximity to the Weston Marsh PoC, being near the MRN, including the A16, A17 and A151. The closest part of the Strategic Road Network is the A47, approximately 8 km south of the Solar Development Area. The majority of HGV movements would access the area using the A16 with shorter movements required on the local road network as illustrated on **ES Figure 15-3: Heavy Goods Vehicle Routing** (Doc Ref. 6.2). The Applicant has sought to utilise existing internal tracks where suitable, with temporary internal access tracks to be constructed to serve construction, operation and decommissioning of the Scheme. Where necessary, land has been included within the Order Limits to facilitate minor improvements to the existing highway to provide suitable access points. **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1) reports no significant adverse effects from the Scheme alone which evidences the effectiveness of the access strategy for the Scheme which largely avoids minor roads.
	2.10.28 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.	
	2.10.29 Developers will usually need to construct on-site access routes for operation and maintenance activities, such as footpaths, earthworks, or landscaping.	
	2.10.30 In addition, sometimes access routes will need to be constructed to connect solar farms to the public road network.	
	2.10.31 Applications should include the full extent of the access routes necessary for operation and maintenance and an assessment of their effects.	
Applicant Assessment – Public Rights of Way	2.10.32 Proposed developments may affect the provision of public rights of way networks	**ES Chapter 15: Traffic and Transport** (Doc Ref. 6.3) provides an assessment of the Scheme's impact on public rights of way within the Order Limits, or that will be impacted by the Scheme.
	2.10.33 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	

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	construction and protect users where a public right of way borders or crosses the site.	A number of existing PRoW traverse the Scheme and are presented in **ES Chapter 15: Traffic and Transport** (Doc Ref. 6.1) and have been illustrated within the **Outline Public Rights of Way Management Plan** (PRoWMP) (Doc Ref. 7.15). The **Outline PRoWMP** (Doc Ref. 7.15) sets out the mitigation, management and monitoring measures for PRoW affected by construction which may require temporary diversion/closure or alternative routing where the former is not possible. PRoW would remain open during operation. The Scheme also includes a new permissive path within Land Parcel C to improve local accessibility and recreation. This permissive path would link into the existing PROW network, open up the adjacent Scheduled Monument for public access and provide a link between Queens Bank and Shepeau Stow. This has been agreed to by the landowner. The visual impacts of the Scheme from PRoW are assessed in **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1).
	2.10.34 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.	
	2.10.35 Applicants are encouraged where possible to minimise the visual outlook from existing public rights of way, considering the impacts this may have on any other visual amenities in the surrounding landscape.	
	2.10.36 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	
	2.10.37 Applicants should set out detail on how public rights of way would be managed to ensure they are safe to use is set out in an outline Public Rights of Way Management Plan.	An **Outline PRoWMP** (Doc Ref. 7.14) has been submitted alongside the application which sets out detail on how PRoW will be managed to ensure they are safe to use.
Applicant Assessment – Security and Lighting	2.10.38 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 and lighting were considered as part of the design with measures including fencing and lighting incorporated as per the design commitments within the **Design Parameters** (Doc Ref. 7.4). Further details are set out in the **Design Approach Document** (Doc Ref. 7.3). It is anticipated that temporary lighting will be used during the construction and decommissioning stages, as described within **ES Chapter 2: The Scheme** (Doc Ref. 6.1). During the operational phase, not permanently turned on lighting is proposed, but security lighting would be sensor triggered, located only around critical electrical infrastructure for security. The assessment presented within Section 12.8 of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1) considers effects from lighting. Good practice measures to minimise the effects of light pollution are included within the **Outline CEMP** (Doc Ref. 7.10), **Outline LEMP** (Doc Ref. 7.16) and **Outline DEMP** (Doc Ref. 7.12). Compliance with these measures is secured through the requirements of the **Draft DCO** (Doc Ref. 3.1). The effects of light pollution on heritage and ecological receptors are considered within **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1) and **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1) respectively.
	2.10.39 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.	

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Technical Consideration – Capacity of a site	2.10.47 The installed generating capacity of a solar farm will decline over time in correlation with the reduction in panel array efficiency. There is a range of sources of degradation that developers need to consider when deciding on a solar panel technology to be used. Applicants may account for this by overplanting solar panel arrays.	Due to fast-evolving pace of solar PV technology, the Scheme allows flexibility to be able to choose specific technology closer to the construction within the parameters defined in the **Draft DCO** (Doc Ref. 3.1) and the **Design Approach Document** (7.3) and **Design Principles** (Doc Ref. 7.4). This will support enabling the optimum production of renewable energy within the Scheme. The Applicant's approach to EIA, including the use of the Rochdale envelope to assess effects, is set out in **ES Chapter 2: The Scheme** and **ES Chapter 4: Overview of the EIA Process** (Doc Ref. 6.1). Maximum parameters for the Scheme are secured within the **Works Plans** (Doc Ref. 2.3) and the **Design Parameters** (Doc Re. 7.4).
	2.10.48 AC installed export capacity should not be seen as an appropriate tool to constrain the impacts of a solar farm. Applicants should use other measurements, such as panel size, total area and percentage of ground cover to set the maximum extent of development when determining the planning impacts of an application.	
Technical Considerations – Site Layout design and appearance	2.10.51 Applicants should consider the criteria for good design set out in Section 4.7 of EN-1 at an early stage when developing projects.	As detailed in the **Design Approach Document** (Doc Ref. 7.3) and **Appendix D: Site Selection Report** (Doc Ref. 7.1), the location and design of the Scheme is the result of a comprehensive site selection process that was environmental and planning led to avoid and minimise impacts as early as practicable. This includes consideration of the factors set out in paragraph 2.10.52. Following this, the Scheme has undergone an iterative design process which has resulted in the delivery of a functional and efficient Scheme design which will deliver a large amount of renewable and low carbon electricity using solar PV modules, whilst also being sensitive to the local context and surrounding area within which it is located, avoiding and minimising impacts on the environment as far as practicable. The **Design Approach Document** (Doc Ref. 7.3) sets out how the Applicant has considered the criteria for good design as set out within EN-1.
	2.10.52 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.	
	2.10.53 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.	
	2.10.54 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 alternative reasons, such as to match peaks in demand. 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 detailed in **ES Chapter 2: The Scheme** (Doc Ref. 6.1), the mounting structure of the Solar PV modules will be designed to face southwards on a fixed platform. The Solar PV modules would be angled at a tilt of 10 to 30 degrees from horizontal to optimise daylight absorption.
	2.10.55 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.	**ES Chapter 2: The Scheme** (Doc Ref. 6.1) sets out the works required to connect the various elements of the Scheme. This includes the Inter-Array Connections which comprise both above and belowground cabling to connect the elements of the Solar Development Area to the Scheme's 400kV Substation and BESS Compound. It also includes details of the 400kV overhead line connection within the Grid Connection Route which exports electricity generated by the Scheme to the Weston Marsh B Substation.
	2.10.56 In the case of underground cabling, applicants are expected to provide a method statement describing cable trench design, installation methodology, as well as details of the operation and maintenance regime.	

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		Details regarding the methodology to construct all elements are set out in **ES Chapter 2: The Scheme** (Doc Ref. 6.1).
Technical Considerations – Project Lifetime	2.10.57 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.	The operational life of the Scheme is 40 years from the date of final commissioning, which is secured via the **Draft DCO** (Doc Ref. 3.1). At the end of the operational (including maintenance) phase, all infrastructure will be dismantled and removed per industry best practices. The decommissioned materials will follow the waste hierarchy such that they will be reused where possible before recycling and disposal are considered. All concrete hardstanding areas, foundations for the infrastructure and any internal tracks will be removed to a depth of up to 1m or as agreed with the landowner. The Solar PV site will be reinstated in accordance with the **Outline DEMP** (Doc Ref. 7.12). At this stage, it is expected that decommissioning will take up to 24 months.
	2.10.58 Time limited consent, where granted, is described as temporary because there is a finite period for which it exists, after which the project would cease to have consent and therefore must seek to extend the period of consent or be decommissioned and removed.	
	2.10.59 Solar panel efficiency deteriorates over time and applicants may elect to replace panels during the lifetime of the site.	The DCO Application takes into account the need to replace certain elements during the lifecycle of the Scheme as part of maintenance activities. Section 2.11 of **ES Chapter 2: The Scheme** (Doc Ref. 6.1) describes the operational maintenance activities and the indicative design lives of the Scheme components which includes a table indicating the likely frequency of replacement. Replacement of Scheme components has been taken into account in the **Environmental Statement** (Doc Ref. 6.1).
Technical Considerations – Decommissioning	2.10.60 Solar panels can be decommissioned relatively easily and cheaply. The nature and extent of decommissioning of a site can vary. Generally, it is expected that the panel arrays and mounting structures will be decommissioned, and underground cabling dug out to ensure that prior use of the site can continue.	The operational life of the Scheme is 40 years from the date of final commissioning. At the end of the operational (including maintenance) phase, all infrastructure will be dismantled and removed per industry best practices. This would include the removal of all PV Panels, mounting poles, solar stations, substations, BESS, 400kV overhead line and towers. The decommissioned materials will follow the waste hierarchy such that they will be reused where practicable before recycling and disposal are considered. All concrete hardstanding areas, foundations for the infrastructure and any internal tracks will be removed to a depth of up to 1m or as agreed with the landowner. It is considered all of the solar PV Modules and batteries used as part of the Scheme will be recycled. This is considered within the waste assessment detailed in the **Outline Site Waste Management Plan** (Outline SMP) (Doc Ref. 7.19).
	2.10.61 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.	
Technical Considerations – Flexibility in the project details	2.10.62 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 Applicant seeks to retain a proportionate degree of flexibility regarding the design detail of certain components of the Scheme. The extent of flexibility required is described in **ES Chapter 2: The Scheme** (Doc Ref. 6.1) the **Design Approach Document** (Doc Ref. 7.3) and **Design Parameters** (Doc Ref. 7.4).

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	• the type of inverter or transformer; and • whether storage will be installed (with the option to install further panels as a substitute).	With the above need for flexibility in mind, the Applicant confirms that the ES has adopted the Rochdale Envelope approach and assessed the likely worst-case development scenario. Establishing the maximum parameters enables a robust assessment of likely significant environmental effects to be undertaken within this ES for topics where the nature of assessment requires a specific level of detail, such as maximum heights, massing or noise levels. Thus, the assessment parameters form the basis of the assessment. The assessment parameters are detailed in the works descriptions which are linked to Schedule 1 within the **Draft DCO** (Doc Ref. 3.1) and the **Design Parameters** (Doc Ref. 7.4).
	2.10.63 Applicants should set out a range of options based on different panel numbers, types and layout, with and without storage.	
Impacts – Biodiversity, ecological, geological conservation and water management	2.10.68 The applicant's ecological assessments should identify any ecological risk from developing on the proposed site.	**ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1) provides an assessment of the Scheme's impacts on important ecological features and is supported by extensive survey work to confirm the ecological habitats and species likely to be affected by the Scheme. The design of the Scheme takes into account ecological receptors and measures are embedded to avoid, reduce or minimise impacts on ecology and biodiversity. These measures are secured through a variety of control document including the **Outline CEMP** (Doc Ref. 7.10), **Outline OEMP** (Doc Ref. 7.11), **Outline LEMP** (Doc Ref. 7.16), **Design Parameters** (Doc Ref. 7.4) and **ES Appendix 11-4: Outline Drainage Strategy** (Doc Ref. 6.3). Key examples include: • Retention of trees with bat PRFs; • Typical 10m stand-off to drains where practicable; • Riparian enhancements; • Pre-construction checks; • Micro-siting to avoid, where practicable, woodland blocks, hedgerows, tree lines, reedbeds and Habitats of Principal Importance (HPI); • Targeted bird flight diverters along the Grid Connection; • Mammal-permeable fencing where required to maintain connectivity; and • Bat sensitive lighting. **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1) concludes that there are no potential significant adverse effects identified on any internationally, nationally or locally designated sites during construction, operation or decommissioning of the Scheme.
	2.70.69 Issues that need assessment may include habitats, ground nesting birds, wintering and migratory birds, bats, dormice, reptiles, great crested newts, water voles and badgers.	
	2.10.70 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.	
	2.10.71 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.	

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	2.10.72 Applicants should consider earthworks associated with construction compounds, access roads and cable trenching.	**ES Chapter 2: The Scheme** (Doc Ref. 6.1) describes the works required for construction of the Scheme, including installation of underground cables, compounds and access roads. An **Outline Soil Management Plan** (Outline SMP) (Doc Ref. 7.14) identifies the importance and sensitivity of the soil resource and provides specific guidance to ensure that there is no significant adverse effect on the soil resource as a result of the Scheme. The Outline SMP includes details of: • A description of the soil types and their resilience to being trafficked; • Soil handling; • Description of works and how soil damage will be minimised; • Monitoring measures for soil condition and criteria against which compliance will be assessed; and • Remediation and aftercare measures. It also includes measures to ensure that where soil stripping occurs, it is stored appropriately to minimise soil damage and to meet requirements for re-use as part of restoration. A detailed Soil Management Plan will be prepared prior to construction as secured by DCO requirement and must be substantially in accordance with the Outline SMP, as set out in the **Draft DCO** (Doc Ref. 3.1).
	2.10.73 Where soil stripping occurs, topsoil and subsoil should be stripped, stored, and replaced separately to minimise soil damage and to provide optimal conditions for site restoration. Further details on minimising impacts on soil and soil handling are above at paragraphs 2.10.25 and 2.10.26.	
	2.10.74 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.	The Scheme's security and lighting have been designed to respond sensitively to ecology and the landscape features. Embedded mitigation measures pertaining to biodiversity and security are discussed in **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1). Security, lighting and CCTV required for the Scheme are described in detail in **ES Chapter 2: The Scheme** (Doc Ref. 6.1), the **oLEMP** (Doc Ref. 7.16), the **Outline CEMP** (Doc Ref. 7.10), the **Outline OEMP** (Doc Ref. 7.11) and the **Outline DEMP** (Doc Ref. 7.12).
	2.10.75 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.	The **ES** (Doc Ref. 6.1) takes account of all works boundaries and hedgerows. Buffers to woodland and hedgerows are included, and proposals for fencing incorporate features to enable the movement of mammals, reptiles and other fauna. These are set out in **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1).

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	2.10.76 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.	**ES Appendix 11-3: Flood Risk Assessment** (Doc Ref. 6.3) assess the flood risk and drainage in the context of the EIA. This concludes that with the proposed mitigation measures to be implemented as part of the Scheme, as secured within the control documents, there will be no material change to flood risk from all sources with no significant effects reported. **ES Appendix 11-4: Outline Drainage Strategy** (Doc Ref. 6.3) demonstrates surface water drainage will be manged effectively to ensure there is no increase in surface water runoff from the Scheme above the existing regime. Factors when developing design and layout of the Scheme are detailed within the **ES Appendix 11-4: Outline Drainage Strategy** (Doc Ref. 6.3).
	2.10.77 Where access tracks need to be provided, permeable tracks should be used, and localised Sustainable Drainage Systems (SuDS), such as swales and infiltration trenches, should be used to control any run-off where recommended.	**ES Appendix 11-4: Outline Drainage Strategy** (Doc Ref. 6.3) provides an outline strategy for drainage. The strategy includes the use of SuDS techniques to control any surface water run-off. **ES Appendix 11-3: Flood Risk Assessment** (Doc Ref. 6.3) demonstrates there will not be any material increase in flood risk, from all sources, as a result of the Scheme, within the Order Limits or elsewhere, with the proposed embedded mitigation in place. **ES Appendix 11-4: Outline Drainage Strategy** (Doc Ref. 6.3) demonstrates surface water drainage will be manged effectively to ensure there is no increase in surface water runoff from the Scheme above the existing regime
	2.10.78 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.	
	2.10.79 Culverting existing watercourses/drainage ditches should be avoided.	**ES Figure 2-3: Indicative Watercourse Crossing Locations** (Doc Ref. 6.2) and **ES Appendix 2-1: Indicative Watercourse Crossing Schedule** (Doc Ref. 6.3) sets out the locations that may require culverts. As a worst-case adopting a precautionary approach, the use of culverts has been assessed. For new access crossings, options for culverting and bridge crossings will be considered at detailed design stage. No culverting of main rivers is proposed (there are no main rivers within the Order Limits). Where bridge crossings are provided, EA's proposed design principles will be applied. Where new watercourse crossings in the form of culverts or upgrades to existing culverts are required, the least impacting design that is reasonably practicable is proposed (e.g. arch rather than box culverts, and box culverts in preference to pipes etc.). The crossings will be sized at detailed design in order to not impact on flow conveyance and to ensure capacity for the peak flow rate.
	2.10.80 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.	
	2.10.81 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.	A BNG Assessment using Defra's Statutory Biodiversity Metric is included as part of the DCO Application within the **Biodiversity Net Gain Report** (Doc Ref. 7.9).

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	2.10.82 For projects in England, applicants should consider any reasonable opportunities to maximise restoration, creation and enhancement of wider biodiversity. This may include consideration and opportunities identified through Local Nature Recovery Strategies, and national goals and targets set through the Environment Act 2021 and the Environmental Improvement Plan.	At the time of submitting this DCO Application, achieving biodiversity net gain is not yet a mandatory obligation for NSIPs. It is expected that the provisions within Schedule 15 of the Environment Act 2021 will come into force in May 2026. Regardless, the Applicant has secured a commitment within Schedule 2 of the **Draft DCO** (Doc Ref. 3.1) to deliver BNG in excess of 10% for area-based habitats and watercourses, and in excess of 400% for hedgerows.
Impacts – landscape, visual and residential amenity	2.10.85 Generic landscape and visual impacts are covered in Section 5.10 of EN-1.	These polices have been responded to in the table setting out the Applicant's assessment against EN-1. **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1) takes into account the potential cumulative impact of the Scheme with other onshore energy infrastructure, including electricity networks infrastructure. The Zone of Influence for the Solar Development Area, Inter-Array Connections and Grid Connection Route is illustrated on the figures that accompany the ES Chapter and reflects that the taller infrastructure associated with the Grid Connection Route would have a wider Zone of Influence compared to other components.
	2.10.86 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.	
	2.10.87 However, whilst it may be the case that the development covers a significant surface area, in the case of ground-mounted solar panels it should be noted that with effective screening and appropriate land topography, the area of a zone of visual influence could be appropriately minimised.	
	2.10.88 Landscape and visual impacts should be considered carefully pre-application. Potential impacts on the statutory purposes of nationally designated landscapes should form a part of the pre-application process.	The potential landscape and visual impacts of the Scheme have been considered carefully through the pre-application stage as described in **ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1) and the **Design Approach Document** (Doc Ref. 7.3). There are no nationally designated landscapes within the Zone of Theoretical Visibility (ZTV) of the Scheme.
	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 language, particularly designated landscapes, the setting of heritage assets and any nearby residential areas or viewpoints.	This has been considered in Section 12.8 Assessment of Likely Effects of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). Visualisations of the Scheme are provided in **ES Figures 12-21 and 12-22** (Doc Ref. 6.2), which include the setting of heritage assets and nearby residential areas and viewpoints.
	2.10.90 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.	The **Design Approach Document** (Doc Ref. 7.3) demonstrates how the principles of 'good design' have been applied to the Scheme. Landscape mitigation is also described in the **Outline LEMP** (Doc Ref. 7.16). This has been considered in Section 12.7 Embedded Mitigation of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1) and referenced figures and appendices. Security measures such as fencing has also been considered in the ES Chapter.
	2.10.91 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 2.10.38 – 2.10.40 of this NPS).	

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	2.10.92 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.	Information on the management and protection of existing vegetation is included within the **OUTLINE CEMP** (Doc Ref. 7.10) and the **OLEMP** (Doc Ref 7.16). **ES Appendix 12-9: Arboricultural Impact Assessment** (Doc Ref. 6.3) provides an assessment of the Scheme on established trees. Impacts on hedgerows are considered within Section 9.8 of **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1).
	2.10.93 The impact of the proposed development on established trees and hedges should be informed by a tree survey and arboriculture/hedge assessment as appropriate.	
Impacts – Glint and Glare	2.10.95 Applicants should map receptors qualitatively to identify potential glint and glare issues and determine if a glint and glare assessment is necessary as part of the application.	Potential glint and glare receptors have been qualitatively identified and assessed within **ES Appendix 16.2 Glint and Glare Assessment** (Doc Ref. 6.1).
	2.10.96 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 geometric possibility and intensity of glint and glare impacts have been considered within **ES Appendix 16.2: Glint and Glare Assessment** (Doc Ref. 6.3).
	2.10.97 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.	Regard has been had to panel type when completing **ES Appendix 16.2: Glint and Glare Assessment** (Doc Ref. 6.3). The proposed panels are fixed south-facing, no tracking panels are proposed.
	2.10.98 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.	Where panels are located, the entire footprint is treated as having no gaps and being as reflective as the panel surface for a worst-case scenario within **ES Appendix 16.2: Glint and Glare Assessment** (Doc Ref. 6.3). The residual impact of glint and glare on all receptors is not significant or none. No significant impairment on aviation receptors is identified within **ES Chapter 16: Other Environmental Topics** (Doc Ref. 6.1) or **ES Appendix 16-2: Glint and Glare Assessment** (Doc Ref. 6.3), and the Scheme accords with policy on glint and glare.
Impacts – Historic Environment	2.10.99 The impacts of solar PV developments on the historic environment will require expert assessment in most cases and may have effect both above and below ground.	The methodology for the assessment is provided in Section 8.4 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1), An assessment of the potential impacts of the Scheme is provided within Section 8.9 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1). It includes consideration of both above and below ground assets.
	2.10.100 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.	An assessment of the impacts of the Scheme is provided within Section 8.9 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1), with further information presented in **ES Appendix 8.4: Summary of Heritage Setting Assessment** (Doc Ref. 6.3).
	2.10.101 Below ground impacts, although generally limited, may include direct impacts on archaeological deposits through ground disturbance associated with trenching, cabling, foundations, fencing, temporary haul routes etc.	An assessment of the impacts of the Scheme upon archaeological deposits is provided within Section 8.8 **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1). The assessment sets out the impact on each asset i.e. whether it includes below ground disturbance.

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	2.10.102 Equally, solar PV developments may have a positive effect, for example heritage 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.	Impacts to archaeological assets are limited, where practicable as provided through the design, and as set out in Section 8.8 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1) and the **Design Approach Document** (Doc Ref. 7.3).
	2.10.103 Generic historic environment impacts are covered in Section 5.9 of EN-1.	Noted. The Applicant has provided responses to those policies in the earlier table on EN-1.
	2.10.104 Applicant assessments should be informed by information from Historic Environment Records (HERs) or the local authority.	Data sources are stated in **ES Appendix 8.2: Cultural Heritage Desk Based Assessment** (Doc Ref. 6.3) and include the relevant local authority Historic Environment Record.
	2.10.105 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 LPA and should identify archaeological study areas and propose appropriate schemes of investigation, and design measures, to ensure the protection of relevant heritage assets.	A desk-based assessment is presented in **ES Appendix 8.2: Cultural Heritage Desk Based Assessment** (Doc Ref. 6.3). Consultation undertaken with the local planning authorities is summarised at Section 8.3 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1). Archaeological surveys and field evaluation have been undertaken to allow the Applicant to enhance the baseline understanding of cultural heritage assets including their potential value. The results of the geophysical survey (completed between 2023 and 2025) are available in **ES Appendix 8.2: Cultural Heritage Desk Based Assessment** (Doc Ref. 6.3). Trial trenching evaluation reports will be submitted early in the examination. A post-consent WSI and Archaeological Mitigation and Management Strategy is secured by Requirement to the **Draft DCO** (Doc Ref. 3.1).
	2.10.106 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.	
	2.10.107 The extent of investigative work should be proportionate to the sensitivity of, and extent of, proposed ground disturbance in the associated study area.	Archaeological surveys and field evaluation have been undertaken to allow the Applicant to enhance the baseline understanding of cultural heritage assets including potential value. The scope of work, designed to ensure the work is proportionate, has been discussed through consultation with the local planning authorities as summarised within Section 8.3 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1).
	2.10.108 Applicants should take account of the results of historic environment assessments in their design proposal.	A desk-based assessment is presented in **ES Appendix 8.2: Cultural Heritage Desk Based Assessment** (Doc Ref. 6.3). Embedded mitigation measures considered in the design of the Scheme are set out in Section 8.8 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1).
	2.10.109 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.	An assessment of the impacts of the Scheme upon heritage assets and their setting is provided within Section 8.9 of **ES Chapter 8: Cultural Heritage (**Doc Ref. 6.1). The **Design Approach Document** (Doc Ref. 7.3) describes how heritage assets were considered during design development, including the Scheduled Monuments within and adjacent to the Order Limits, and measures that seek to protect heritage features (such as buffers).

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	2.10.110 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.	An assessment of the impacts of the Scheme upon heritage assets is provided within Section 8.9 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1), with detailed consideration of the setting presented in **ES Appendix 8.4: Summary of Heritage Setting Assessment** (Doc Ref. 6.3). The Applicant has provided as assessment of harm to heritage assets within **Appendix E: Heritage Statement of Harm** (Doc Ref. 7.1). It concludes that the Scheme would not result in substantial harm or total loss to any designated heritages assets (or equivalent).
	2.10.111 Applicants may need to include visualisations to demonstrate the effects of a proposed solar farm on the setting of heritage assets.	**ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1) presents the findings of an assessment of the likely significant effects from a landscape and visual perspective and is supported by visualisations, presented in **ES Figures 12-21 and 12-22** (Doc Ref. 6.2). (Doc Ref. 6.2). The result of the LVIA assessment and any relevant viewpoint photography and photomontages were taken into consideration of the impacts of the Scheme upon heritage assets, as set within Section 8.9 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1).
Impacts – Construction Including traffic and transport, noise and vibration	2.10.115 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 proposed HGV and AIL routing is shown on **ES Figures 15-3 and 15-4** (Doc. Ref. 6.2). These routes have been chosen as the most appropriate for delivering materials and components to the Scheme. These routes maximise the use of the major road network and limit use of local roads.
	2.10.116 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.	Section 15.8 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1) outlines the assessment of effects, which assesses the peak construction phase and therefore the worst-case impact of HGVs on the most likely construction routes. The proposed HGV and AIL routing is shown in **ES Figures 15-3 and 15-4** (Doc. Ref. 6.2).
	2.10.117 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** (Doc Ref. 7.13) outlines how the Scheme access layouts have been designed to accommodate the weight, volume and width of HGVs.
	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.	**ES Chapter 15: Traffic and Access** (Doc Ref. 6.1) takes into account the potential cumulative effect of the Scheme alongside other energy infrastructure projects. Section 7.6 of the **Outline CTMP** (Doc Ref. 7.13) includes potential measures to mitigate the impact with other schemes. This could include sharing the shuttle service to transport construction workers to/from multiple sites. Further details (if deemed appropriate and feasible) will be set out within the Framework CTMP(s) or potentially as part of a joint CTMP post-consent once further details in relation to the cumulative NSIP schemes are known, e.g. project timeframes and the approach.

Part	EN-3 Policy Text	Assessment
		The Applicant has engaged with the relevant local highway authority (Lincolnshire County Council) through the pre-application stage.
Mitigations – Agriculture Land classification and land type	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 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.	The **Outline SMP** (Doc Ref. 7.14) sets out measures to preserve soil resource during construction, operation and decommissioning, avoiding both the loss of soil material from the Scheme and the loss of soil functional capacity for supporting agricultural production.
Mitigations – Biodiversity and ecological conservation	2.10.120 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 2021 or elsewhere. 2.10.122 Applicants are advised to develop an ecological monitoring programme to monitor impacts upon the flora of the site and upon any particular ecological receptors (such as bats and wintering birds). Results of the monitoring will then inform any changes needed to the land management of the site, including, if appropriate, any livestock grazing regime.	A description of how the Scheme will take advantage of opportunities to enhance biodiversity within the Order Limits and potentially of the wider environment is provided in **ES Chapter 9: Ecology and Biodiversity** (Doc Ref 6.1). Further details are also provided within the **Outline LEMP** (Doc Ref. 7.16), including with regards to proposed monitoring. A BNG Assessment using Defra's Statutory Biodiversity Metric is included as part of the DCO Application within the **Biodiversity Net Gain Report** (Doc Ref. 7.9), with BNG commitments secured within the **Draft DCO** (Doc Ref. 3.1).
Migration – Landscape, visual and residential amenity	2.10.123 Applicants should consider the potential to mitigate landscape and visual impacts through, for example, screening with native hedges, trees and woodlands. 2.10.124 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. 2.10.125 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.	The **Outline LEMP** (Doc Ref. 7.16) sets out mitigation planting proposals, including planting proposed to screen the Solar Development Area. Buffers are proposed from residential receptors to minimise visual impacts of the Scheme. These are secured within the **Works Plans** (Doc Ref. 2.3) and **Design Parameters** (Doc Ref. 7.4). As set out within the **OLEMP** (Doc Ref. 7.16), the lighting scheme would be designed, where feasible, in accordance the ILP/BCT GN 08/23 (Bats and Artificial Lighting in the UK), using ecological constraints to maintain dark corridors and minimise disturbance to protected species. Where identified as being required on ecological grounds, lights would aim to have the following characteristics, which will also reduce effects on visual receptors: • Use warm/amber light (≤2700 K), low blue content, no UV. • Downward-facing, tightly focused light at low mounting heights; add shields if needed to stop spill. • Set back from key features (trees with bat potential/roosts, hedgerows, treelines,

Part	EN-3 Policy Text	Assessment

		watercourses) and keep dark corridors continuous.
		• Lux targets:
		  ○ Roosts: target 0 lux; verify ≤0.2 lux at roost faces/entrances (≤0.5 lux only with strong justification and extra mitigation).
		  ○ Commuting/foraging corridors: ≤0.5 lux along the feature.
		  ○ Other habitat edges (not key bat features): ≤1 lux.
		• Apply the same thresholds to temporary lighting.
		• Controls: default off, motion-activated with short dwell times, dimming and part night curfews; do not place sensors on wildlife routes.
		• Temporary works: task only portable lighting, oriented away from sensitive habitats; minimise night working.
		• Verify and adapt: dusk/night lux checks at receptors; if limits are exceeded, re aim, add shielding or dim and re check.

Mitigations – Glint and Glare	2.10.126 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.	Solar PV panels used as part of the Scheme will include anti-glare coating as standard, as set out within the **Design Parameters** (Doc Ref. 7.4).
	2.10.127 Applicants may consider using screening between potentially affected receptors and the reflecting panels to mitigate the effects.	The requirement for screening has been considered as part of the visibility assessment within **ES Appendix 16.2: Glint and Glare Assessment** (Doc Ref. 6.3), which takes into account the final layout of the Scheme and the existing and proposed planting. No landscaping planting is specifically required to mitigate effects from glint and glare.
	2.10.128 Applicants may consider adjusting the azimuth alignment of, or changing the elevation tilt angle of, a solar panel within the economically viable range, to alter the angle of incidence. In practice this is unlikely to remove the potential impact altogether but in marginal cases may contribute to a mitigation strategy.	A worst-case has been assumed for each receptor in **ES Appendix 16.2 Glint and Glare Assessment** (Doc Ref. 6.3). No change to the angle of the panels is considered to be required to mitigate effects.
Mitigations – Historic Environment	2.10.129 The ability 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.	An assessment of the impacts of the Scheme upon heritage assets is provided within Section 8.9 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1). The Applicant will provide an Archaeological Mitigation and Management Strategy early in the examination. It will set out measures to minimise impacts during detailed design, including micro-siting, and will take into account the field evaluations completed by the Applicant.
	2.10.130 Where requested by the applicant, the Secretary of State should consider granting consents which allow for the micro siting within a specified tolerance of elements of the permitted infrastructure, so that precise locations can be amended during the construction phase if unforeseen circumstances, such as the discovery of previously unknown archaeology, arise.	The Applicant seeks to retain a proportionate degree of flexibility regarding the design detail of certain components of the Scheme. The extent of flexibility required is described in **ES Chapter 2: The Scheme** (Doc Ref. 6.1), the Works Plans (Doc Ref. 2.3), the **Design Approach Document** (Doc Ref. 7.3) and **Design Parameters** (Doc Ref. 7.4).

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		With the above need for flexibility in mind, the Applicant confirms that the ES has adopted the Rochdale Envelope approach and assessed the likely worst-case development scenario, including within **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1). This allows for the micro-siting of Scheme components during detailed design to minimise impacts on cultural heritage.
Mitigations – Construction including traffic and transport, noise and vibrations	2.10.131 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.	Section 15.7 and 15.9 of **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1) outlines proposed embedded and additional mitigation measures, which include measures pertaining to the movement timings of HGVs. The proposed routing of HGVs and AILs is shown in **ES Figures 15-3 and 15-4** (Doc. Ref. 6.2) and have been chosen as the most appropriate for delivering materials and components to the Scheme.
	2.10.132 Where the Secretary of State agrees that this is necessary, requirements could be imposed on development consent.	The **Outline CTMP** (Doc Ref. 7.13) will be secured by a requirement to the **Draft DCO** (Doc Ref. 3.1).
	2.10.133 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.	**ES Chapter 15: Traffic and Access** (Doc Ref. 6.1) takes into account the potential cumulative effect of the Scheme alongside other energy infrastructure projects. Section 7.6 of the Outline CTMP (Doc Ref. 7.13) includes potential measures to mitigate the impact with other schemes. This could include sharing the shuttle service to transport construction workers to/from multiple sites. Further details (if deemed appropriate and feasible) will be set out within the detailed CTMP(s) or potentially as part of a joint CTMP post-consent once further details in relation to the cumulative NSIP schemes are known, e.g. project timeframes and the approach.
	2.10.134 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.	The **Outline CTMP** (Doc Ref. 7.13) will be secured by a requirement to the **Draft DCO** (Doc Ref. 3.1). Section 7.4 sets out details of a proposed Delivery Management System which will be implemented to control bookings of HGV deliveries from the start of the construction period. This will be used to regulate the arrival times of HGVs via timed delivery slots, as well as to monitor compliance of HGV routing which will be communicated to all suppliers. In addition, measures will be in place to ensure no queuing back from accesses onto the surrounding road network occurs.
	2.10.135 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.	To reduce the potential impact of HGV deliveries, the arrival and departure times will be managed to minimise the number of HGVs travelling to the Scheme during the network peak hours for the local highway network. A Framework CTMP will be developed post-consent which will be submitted to the relevant highway authority for approval as secured within the Schedule 2 Requirements to the **Draft DCO** (Doc Ref. 3.1).
	2.10.136 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.	Section 7.6 of the **Outline CTMP** (Doc Ref. 7.13) includes potential measures to mitigate the impact with other schemes. This could include sharing the shuttle service to transport construction workers to/from multiple sites. Further details (if deemed appropriate and feasible) will be set out within the Framework CTMP(s) or potentially

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		as part of a joint CTMP post-consent once further details in relation to the cumulative NSIP schemes are known, e.g. project timeframes and the approach.
Secretary of State Decision Making – Factors influencing site selection and design – agriculture land classification and land type	2.10.137 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.	An **Outline Soil Management Plan** (Outline SMP) (Doc Ref. 7.14) identifies the importance and sensitivity of the soil resource and provides specific guidance to effect to avoid, minimise or reduce impacts on the soil resource as a result of the Scheme. The Outline SMP includes details of: • A description of the soil types and their resilience to being trafficked; • Soil handling; • Description of works and how soil damage will be minimised; • Monitoring measures for soil condition and criteria against which compliance will be assessed; and • Remediation and aftercare measures. A detailed Soil Management Plan will be prepared prior to construction as secured by DCO requirement and must be substantially in accordance with the Outline SMP, as set out in the **Draft DCO** (Doc Ref. 3.1).
Secretary of State Decision Making – Technical Considerations – Project lifetime and decommissioning	2.10.138 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 2.10.60 and 2.10.61).	The Solar PV Development will be reinstated in accordance with the **Outline DEMP** (Outline DEMP) (Doc Ref. 7.12) which has been provided with the Application. There is a DCO requirement included in Schedule 2 of the Draft DCO (Doc Ref. 3.1) securing the decommissioning of the Scheme 40 years after the date of final commissioning. The requirement requires the approval of the DEMP at that time and that the approved plan is thereafter implemented, thus securing the decommissioning. The effects of decommissioning are often similar to, or of a lesser magnitude than, construction effects and are considered in **ES Chapters 5 to 16** (Doc Ref. 6.1). Effects on landscape and visual amenity and the settings of heritage assets during decommissioning would be temporary and short term. Following decommissioning and landscape will be largely restored to its pre-development state.
	2.10.139 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.	
	2.10.140 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.	
	2.10.141 An upper limit of 40 years is typical, although applicants may seek consent without a time period or for differing time-periods for operation.	
	2.10.142 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.	
	2.10.143 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.	

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Secretary of State Decision Making – Impacts – Biodiversity, ecological, geological conservation and water management	2.10.146 Water management is a critical component of site design for ground mount solar plants. Where previous management of the site has involved intensive agricultural practice, solar sites can deliver significant ecosystem services value in the form of drainage, flood attenuation, natural wetland habitat, and water quality management.	The Scheme will deliver biodiversity improvements including landscaping, habitat management and biodiversity enhancement to retain and enhance ecological and recreational connectivity. As captured and secured within the **Outline LEMP** (Doc Ref. 7.16), the Scheme provides several biodiversity benefits including new planting of shrubs, scattered trees, species rich grassland, semi-improved grassland, new or upgraded water course crossings with up to 15m habitat enhancement buffer up and downstream (subject to agreement with Internal Drainage Boards), retained agricultural land and retained pastureland. Areas of new woodland have not been proposed to avoid the permanent loss of best and most versatile agricultural land.
	2.10.147 The Secretary of State must consider the worst-case effects in its consideration of the application and consent.	The Applicant seeks to retain a proportionate degree of flexibility regarding the design detail of certain components of the Scheme. The extent of flexibility required is described in **ES Chapter 2: The Scheme** (Doc Ref. 6.1) the **Design Approach Document** (Doc Ref. 7.3) and **Design Parameters** (Doc Ref. 7.4). With the above need for flexibility in mind, the Applicant confirms that the ES has adopted the Rochdale Envelope approach and assessed the likely worst-case development scenario. Establishing the maximum parameters enables a robust assessment of likely significant environmental effects to be undertaken within this ES for topics where the nature of assessment requires a specific level of detail, such as maximum heights, massing or noise levels.
	2.10.148 Where developments are proposed on peat, to ensure the development will result in minimal disruption to the ecology, hydrology, or release of CO2, and that the carbon balance savings of the scheme are maximised, the Secretary of State should be satisfied that the solar farm layout and construction methods have been designed to minimise soil disturbance and other peatland impacts during construction and maintenance of roads, tracks, and other infrastructure and where possible are compatible with raised water table management. Where developments are located in Wales, the Secretary of State may take into account the policies set out in Section 6.4 of Planning Policy Wales (Edition 12, February 2024), the National Peatlands Action Programme, 2020-2025 (cyfoethnaturiol.cymru)105 and Future Wales the National Plan 2040 – Policies 9, 17 and 18.	No peat soils are present within the Scheme. The **Outline SMP** (Doc Ref. 7.14) sets out measures to preserve soil resource during construction, operation and decommissioning, avoiding both the loss of soil material from the Scheme and the loss of soil functional capacity for supporting agricultural production.
Secretary of State Decision Making – Impacts – Landscape,	2.10.149 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	ES Chapter 12: Landscape and Visual (Doc Ref. 6.1) provides an assessment of landscape and visual impact of the Scheme, 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

Part	EN-3 Policy Text	Assessment
visual and residential amenity	designated landscapes and their settings (National Parks, The Broads and National Landscapes) 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.	The Secretary of State can be satisfied that the **Design Parameters** (Doc Ref. 7.4) and **Outline LEMP** (Doc Ref. 7.16) secure measures that will control the detailed design of the Scheme and aid meeting good design objectives as set out within the **Design Approach Document** (Doc Ref. 7.4) in line with paragraph 5.10.30 of EN-1. Further, the Applicant is seeking a time-limited consent, and the adverse effects associated with landscape and visual would be reversed following the decommissioning of the Scheme. There are no nationally designated landscapes within the Zone of Theoretical Visibility (ZTV) of the Scheme.
Secretary of State Decision Making – Impacts – Glint and Glare	2.10.150 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 residual impact of glint and glare on all receptors is not significant or none. No significant impairment on aviation receptors is identified within **ES Chapter 16: Other Environmental Topics** (Doc Ref. 6.1) or **ES Appendix 16-2: Glint and Glare Assessment** (Doc Ref. 6.3), and the Scheme accords with policy on glint and glare as set out with EN-3.
	2.10.151 Whilst there is some evidence that glint and glare from solar farms can be experienced by pilots and air traffic controllers in certain conditions, there is no evidence that glint and glare from solar farms results in significant impairment on aircraft safety. Therefore, unless a significant impairment can be demonstrated, the Secretary of State is unlikely to give any more than limited weight to claims of aviation interference because of glint and glare from solar farms.	
Secretary of State Decision Making – Impacts – Historic Environment	2.10.152 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.	An assessment of the impacts of Scheme upon heritage assets is provided within Section 8.9 of **ES Chapter 8: Cultural Heritage** (Doc Ref. 6.1). While there would be some permanent adverse effects on heritage assets, the majority of impacts are temporary in nature and would be reversed upon either the completion of construction or decommissioning of the Scheme.
Secretary of State Decision Making – Impacts – Construction including traffic and transport noise and vibration	2.10.153 Once solar farms are in operation, traffic movements to and from the site are generally very light, in some instances as little as a few visits each month by a light commercial vehicle or car. Should there be a need to replace machine components, this may generate heavier commercial vehicle movements, but these are likely to be infrequent.	Neither **ES Chapter 15: Traffic and Access** (Doc Ref. 6.1) or **ES Chapter 13: Noise and Vibration** (Doc Ref. 6.1) report any significant adverse effects during the operational phase of the Scheme. The **Outline OEMP** (Doc Ref. 7.11) sets out measures to manage the potential impacts during the operation of the Scheme including traffic and transport, and noise and vibration.
	2.10.154 The Secretary of State is unlikely to give any more than limited weight to traffic and transport noise and vibration impacts from the operational phase of a project.	

3. National Policy Statement for Electricity Networks Infrastructure (EN-5)

3.1.1. Table 3-1 below details the policies within the National Policy Statement for Electricity Networks Infrastructure (EN-5) (December 2025). Policies which are not relevant to the Scheme are not included within this table.

Table 3-1 Relevant Policies within EN-5

Part	EN-5 Policy Text	Assessment
2.2 Factors influencing site selection and design	2.2.5 Applicants retain control in managing the identification of routing and site selection between the identified initiating and terminating points or within the development zone.	**Appendix D: Site Selection Report** (Doc Ref. 7.1) describes the site selection process for the Scheme. The initiating and terminating points were identified as a result of the Applicant's Grid Connection Agreement to connect into the planned Weston Marsh Substation, and the securing of land for the Solar Development Area. A range of factors, including engineering, environmental and community considerations were considered in determining the route between these points, as well as the locations of substations and other associated infrastructure. The Applicant has also set out its process for identifying the route of the overhead lines, and the location of substations and other associated infrastructure, in the **Design Approach Document** (Doc Ref. 7.3) **and ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1).
	2.2.6 Moreover, the locational constraints identified above do not, of course, exempt applicants from their duty to consider and balance the site-selection considerations set out below, much less the policies on good design and impact mitigation detailed in Sections 2.4 and Section 2.10.	
	2.2.7 The connection between the initiating and terminating points of a proposed new electricity line will often not be via the most direct route. Siting constraints, such as engineering, environmental or community considerations will be important in determining a feasible route.	
	2.2.8 There will usually be a degree of flexibility in the location of the development's associated infrastructure such as substations, and applicants should consider carefully their placement in the local landscape, as well as their design.	
	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 Sections 2.9 – 2.10 below and Section 5.10 in EN-1).	The **Design Approach Document** (Doc Ref. 7.3) demonstrates how the principles of 'good design' have been applied to the Scheme to mitigate the impacts of the infrastructure. Landscape and ecological mitigation is also described in the **OLEMP** (Doc Ref. 7.16). This has been considered in Section 9.7 of Embedded Mitigation of ES Chapter 9: Ecology and Biodiversity (Doc Ref. 6.1) and Section 12.7 Embedded Mitigation of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1) and referenced figures and appendices. With the design led approach to the siting of infrastructure and the application of landscape mitigation to do what it reasonably can to mitigate effects on the countryside and local environmental features as set out in the above documents, the Applicant considers its duties under Section 9 and Schedule 9 of the Electricity Act 1989 have been satisfied.
	2.2.10 As well as having duties under Section 9 of the Electricity Act 1989, (in relation to developing and maintaining an economical and efficient network), Applicants must take into account Schedule 9 to the Electricity Act 1989, which places a duty on all transmission and distribution licence holders, in formulating proposals for new electricity networks infrastructure, to "have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and …do what [they] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects."	

	2.2.11 Depending on the location of the proposed development, statutory duties under Section 85 of the Countryside and Rights of Way Act 2000, Section 11A of the National Parks and Access to the Countryside Act 1949 (as amended by Section 62 of the Environment Act 1995), and Section 17A of the Norfolk and Suffolk Broads Act 1988 may be relevant. Applicants should note amendments to each of these provisions contained in Section 245 of the Levelling Up and Regeneration Act 2023.	N/A - The Scheme is not located within a National Park, The Broads or National Landscape, and as such these duties are not considered relevant.
2.3 Climate Change Adaptation and Resilience	2.3.2 As climate change is likely to increase risks to the resilience of some of this infrastructure, from flooding for example, or in situations where it is located near the coast or an estuary or is underground, applicants should in particular set out to what extent the proposed development is expected to be vulnerable, and, as appropriate, how it has been designed to be resilient to: • flooding, particularly for substations that are vital to the network; and especially in light of changes to groundwater levels resulting from climate change; • the effects of wind and storms on overhead lines; • higher average temperatures leading to increased transmission losses; • earth movement or subsidence caused by flooding or drought (for underground cables); and • coastal erosion – for the landfall of offshore transmission cables and their associated substations in the inshore and coastal locations respectively	Section 7.8 of **ES Chapter 7: Climate Change** (Doc Ref. 6.1) and ES Appendix 7.2: Climate Change Risk Register (Doc Ref. 6.3) contain a climate change risk assessment, considering the resilience of the effects of changing climate conditions on the Scheme. Future increased risk of flooding is considered within within **ES Appendix 11.3: Flood Risk Assessment** (Doc Ref. 6.3). Coastal change is not relevant to the Scheme given its distance from the coast.
	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 Section 5.6 in EN1)	
2.4 Consideration of good design for energy infrastructure	2.4.1 The Planning Act 2008 requires the Secretary of State to have regard, in designating an NPS, and in determining applications for development consent to the desirability of good design.	The **Design Approach Document** (Doc Ref. 7.3) demonstrates how the Scheme would fulfil the requirement for good design. It explains how the Holford and Horlock Rules have been applied to the design of the overhead lines and substations. The Electricity Transmission Design Principles have yet to be published at the point of submission. **ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1) also outlines how landscape and visual amenity have been considered in the preliminary site section and design of the Scheme.
	2.4.2 Applicants should consider the criteria for good design set out in EN1 Section 4.7, the Holford and Horlock rules and Electricity Transmission Design Principles (See Section 2.9 below) at an early stage when developing projects.	
	2.4.3 However, the Secretary of State should bear in mind that electricity networks infrastructure must in the first instance be safe and secure, and that the functional design constraints of safety and security may limit an applicant's ability to influence the aesthetic appearance of that infrastructure.	Safety and security are key factors that have influenced the design of the electricity networks infrastructure that forms part of the Scheme. The **Design Approach Document** (Doc Ref. 7.1) describes the design principles which reflect the key considerations guiding design development. Principle 1 is to 'deliver a technically compliant Scheme that is safe,

	2.4.4 While the above principles should govern the design of an electricity networks infrastructure application to the fullest possible extent – including in its avoidance and/or mitigation of potential adverse impacts (particularly those detailed in Sections 2.10 below) – the functional performance of the infrastructure in respect of security of supply and public and occupational safety must not thereby be threatened.	secure, efficient and maximises the ambition to deliver clean, green energy to the National Grid'. **ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1) describes the alternatives considered, this includes the suitability of pylon types available for a 400kV connection.
2.9 Applicant Assessment - Biodiversity and Geological Conservation	2.9.3 Electricity networks infrastructure pose a particular potential risk to birdlife including large birds, such as swans and geese, and perching birds. These may collide with overhead lines and risk being electrocuted. Large birds may also be electrocuted when landing or taking off by completing an electric circuit between live and ground wires. Even perching birds can be killed as soon as their wings touch energised parts of the infrastructure.	As set out with **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1), detailed collision risk modelling and use of bird diverters as mitigation has been included in the operational phase assessment to mitigate collision risk, in order to avoid significant adverse effects on bird populations using the area. **ES Appendix 9-14: HRA Report** (Doc. Ref. 6.3) includes consideration of feeding and hunting grounds, migration corridors and breeding grounds which are functionally linked sites to designated sites under the National Site Network. The efficacy of bird diverters has been taken into account, including a review of various line marker options. Worst-case efficacy assumptions have been used within collision risk modelling reported within **ES Appendix 9-14: HRA Report** (Doc. Ref. 6.3).
	2.9.4 Applicants should consider measures to make lines more visible such as bird flappers and diverters which are covered in more detail in Sections 2.10.2 - 2.10.4	
	2.9.5 The applicant will need to consider whether the proposed line will cause such problems at any point along its length and take this into consideration in the preparation of the ES (see Section 4.3 of EN-1)	
	2.9.6 Particular consideration should be given to feeding and hunting grounds, migration corridors and breeding grounds, where they are functionally linked to sites designated or allocated under the 'national site network' provisions of the Conservation of Habitats and Species Regulations and Conservation of Offshore Marine Habitats and Species Regulations	
2.9 Applicant Assessment - Landscape and Visual Impact	2.9.7 While the government does not believe that the development of overhead lines is incompatible in principle with applicants' statutory duty under Schedule 9 to the Electricity Act 1989, to have regard to visual and landscape amenity and to reasonably mitigate possible impacts thereon, in practice new overhead lines can give rise to adverse landscape and visual impacts.	Landscape and visual impacts of the proposed overhead lines and associated infrastructure including substations and cable sealing end compounds are assessed in **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1). Cumulative effects with other infrastructure projects are also assessed within the chapter. **ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1) describes the alternatives considered in relation to electricity infrastructure networks. The **Design Approach Document** (Doc Ref. 7.3) describes the process the Applicant took throughout design development including reconfiguration and rationalisation of the overhead lines.
	2.9.8 These impacts depend on the type (for example, whether lines are supported by towers or monopole structures), scale, siting, and degree of screening of the lines, as well as the characteristics of the landscape and local environment through which they are routed.	
	2.9.9 New substations, sealing end compounds (including terminal towers), and other above-ground installations that serve as connection, switching, and voltage transformation points on the electricity network may also give rise to adverse landscape and visual impacts.	
	2.9.10 Cumulative adverse landscape, seascape and visual impacts may arise where new overhead lines are required along with other related developments such as substations, wind farms, and/or other new sources of generation.	
	2.9.11 Landscape and visual benefits may arise through the reconfiguration, rationalisation, or undergrounding of existing electricity network infrastructure.	

	Though mitigation of the landscape and visual impacts arising from overhead lines and their associated infrastructure is usually possible, it may not always be so, and the impossibility of full mitigation in these cases does not countermand the need for overhead lines.	
	2.9.12 However, in nationally designated landscapes (National Parks, The Broads and National Landscapes) even residual impacts may make an overhead line proposal unacceptable in planning terms (see paragraph 2.9.21 below for guidance on this case).	N/A – The Scheme is not proposed in any National Parks, the Broads or National Landscapes.
	2.9.13 Where possible, applicants should ensure that the principles detailed in paragraphs 2.9.16-2.9.19 below are embodied in the design of their proposed overhead line route and its associated infrastructure. Applicants should also offer proposals (for instance those detailed in Section 2.10 below) for additional mitigation.	The **Design Approach Document** (Doc Ref. 7.3) describes the design principles that influenced the design of the Scheme. Consideration and application of the Holford and Horlock Rules is detailed in the appendices. The Applicant has considered opportunities for screening such surrounding the Cable Sealing End Compounds but recognises there is limited opportunities to screen pylons given their height.
	2.9.14 Where the nature or proposed route of an overhead line will likely result in particularly significant landscape and visual impacts, as would be assessed through seascape, landscape and visual impact assessment (SLVIA), the applicant should demonstrate that they have given due consideration to the costs and benefits of feasible alternatives to the overhead line. This could include, where appropriate re-routing, underground or subsea cables and the feasibility e.g. in cost, engineering or environmental terms of these. Applicants should note the policy position for nationally designated landscapes at paragraph 2.9.21 below.	The Applicant has provided an indication of the costs and benefits of feasible alternatives within **ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1), however the effects associated with the overhead line NSIPs are not considered to be 'particularly significant' to necessitate the detailed consideration of alternatives prescribed in paragraph 2.9.15 of EN-5.
	2.9.15 The ES should set out details of this consideration, including the applicant's rationale for eschewing feasible alternatives to the overhead line, and the mitigation cost-calculation methodology that this rationale may rely upon.	
	2.9.16 The Holford Rules (guidelines for the routing of new overhead lines) were originally set out in 1959. These guidelines, intended as a common-sense approach to overhead line route design, were reviewed and updated by the industry in the 1990s, and they should be embodied in the applicants' proposals for new overhead line.	The Applicant has taken into account the Holford Rules when routing the overhead lines that form part of the Scheme. The **Design Approach Document** (Doc Ref. 7.3) demonstrates how each of these rules has been applied to the Scheme.
	2.9.17 In brief, the Holford Rules state that applicants should: • Avoid altogether, if possible, the major areas of highest amenity value, by so planning the general route of the line in the first place, even if total mileage is somewhat increased in consequence; • Avoid smaller areas of high amenity value or scientific interest by deviation, provided this can be done without using too many angle towers, i.e. the bigger structures which are used when lines change direction; • Other things being equal, choose the most direct line, with no sharp changes of direction and thus with fewer angle towers;	

	• Choose tree and hill backgrounds in preference to sky backgrounds wherever possible. When a line has to cross a ridge, secure this opaque background as long as possible, cross obliquely when a dip in the ridge provides an opportunity. Where it does not, cross directly, preferably between belts of trees; • Prefer moderately open valleys with medium or moderate levels of tree cover where the apparent height of towers will be reduced, and views of the line will be broken by trees; • Where country is flat and sparsely planted, and unless specifically preferred otherwise by relevant stakeholders, keep the high voltage lines as far as possible independent of smaller lines, converging routes, distribution poles and other masts, wires and cables, so as to avoid a concentration of lines or 'wirescape'; and • Approach urban areas through industrial zones, where they exist; and when pleasant residential and recreational land intervenes between the approach line and the substation, carefully assess the comparative costs of undergrounding.	
	2.9.18 The Horlock Rules (guidelines for the design and siting of substations) were established by National Grid in 2009 in pursuance of its duties under Schedule 9 to the Electricity Act 1989. These principles should be embodied in applicants' proposals for the infrastructure associated with new overhead lines.	The Applicant has taken into account the Horlock Rules when siting and designing the Scheme's substations. The **Design Approach Document** (Doc Ref. 7.3) demonstrates how each of these rules has been applied to the Scheme.
	2.9.19 In brief, the Horlock Rules state that applicants should: • Consider environmental issues from the earliest stage to balance the technical benefits and capital cost requirements for new developments against the consequential environmental effects in order to keep adverse effects to a reasonably practicable minimum; • Seek to avoid altogether internationally and nationally designated areas of the highest amenity, cultural or scientific value by the overall planning of the system connections; • Protect as far as reasonably practicable areas of local amenity value, important existing habitats and landscape features including ancient woodland, historic hedgerows, surface and ground water sources and nature conservation areas; • Take advantage of the screening provided by land form and existing features and the potential use of site layout and levels to keep intrusion into surrounding areas to a reasonably practicable minimum; • Keep the visual, noise and other environmental effects to a reasonably practicable minimum;	

	• Consider the land use effects of the proposal when planning the siting of substations or extensions; • Consider the options available for terminal towers, equipment, buildings and ancillary development appropriate to individual locations, seeking to keep effects to a reasonably practicable minimum; • Use space effectively to limit the area required for development consistent with appropriate mitigation measures and to minimise the adverse effects on existing land use and rights of way, whilst also having regard to future extension of the substation; • Make the design of access roads, perimeter fencing, earthshaping, planting and ancillary development an integral part of the site layout and design, so as to fit in with the surroundings; • In open landscape especially, high voltage line entries should be kept, as far as possible, visually separate from low voltage lines and other overhead lines so as to avoid a confusing appearance; • Study the inter-relationship between towers and substation structures and background and foreground features so as to reduce the prominence of structures from main viewpoints. Where practicable the exposure of terminal towers on prominent ridges should be minimised by siting towers against a background of trees rather than open skylines	
	2.9.20 NESO will consult on and publish Electricity Transmission Design Principles (ETDP), which will apply to onshore and offshore electricity transmission infrastructure. The ETDP will provide guidance on transmission technology choices available to mitigate the impact of transmission infrastructure on the landscape, environment and communities whilst embedding innovation into design. Once the ETDP is published, developers should have regard to the ETDP as relevant, in addition to the Holford and Horlock rules.	The Electricity Transmission Design Principles have yet to be published at the point of submission.
2.9 Applicant Assessment - Undergrounding and subsea cables	2.9.21 Although it is the government's position that overhead lines should be the strong starting presumption for electricity networks developments in general, this presumption is reversed when proposed developments will cross part of a nationally designated landscape (i.e. National Park, The Broads, or National Landscape).	The Scheme's overhead lines do not cross part of a nationally designated landscape (i.e. National Park, The Broads, or National Landscape), therefore the strong starting presumption for overhead lines continues to be relevant to the Scheme.
	2.9.22 In these areas, and where harm to the landscape, visual amenity and natural beauty (including their special qualities and key characteristics) of these areas cannot feasibly be avoided by rerouting overhead lines, the strong starting presumption will be that the applicant should underground the relevant section of the line.	
	2.9.23 However, undergrounding will not be required where it is infeasible in engineering terms, or where the harm that it causes (see paragraph 2.11.4) is not outweighed by its corresponding landscape, visual amenity and natural beauty	

	benefits. Regardless of the option, the scheme through its design, delivery, and operation, should seek to further the statutory purposes of the designated landscape. These enhancements may go beyond the mitigation measures needed to minimise the adverse effects of the scheme	
	2.9.24 Additionally, cases will arise where, though no part of the proposed development crosses a designated landscape, a high potential for widespread and significant adverse landscape and/or visual impacts along certain sections of its route may result in recommendations to use undergrounding for relevant segments of the line or alternatively consideration of using a route including subsea cabling.	While there is no definition within EN-5 as to what may be deemed particularly significant, the Applicant has understood this to be those effects that exceed moderate adverse significance, which is not the case for the overhead line infrastructure, including in the cumulative effects assessment. Additionally, there is no specific segment of the Grid Connection Route where greater landscape or visual effects are reported.
	2.9.25 In these cases, and taking account of the fact that the government has not laid down any further rule on the circumstances requiring use of underground or subsea cables, the Secretary of State must weigh the feasibility, cost, and any harm of the undergrounding or subsea option against: • The adverse implications of the overhead line proposal; • The cost and feasibility of re-routing overhead lines or mitigation proposals for the relevant line section; and • The cost and feasibility of the reconfiguration, rationalisation, and/or use of underground or subsea cabling of proximate existing or proposed electricity networks infrastructure	**ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1) considers alternatives, including undergrounding. It demonstrates that an underground line could also give rise to significant adverse effects, particularly with respect to impacts of buried archaeology and watercourses due to the number of crossings that would be required. The chapter identifies that, depending on the alignment of the Grid Connection, it would need to cross approximately 50 watercourses and 14 roads should it be undergrounded. Traffic management and temporary road closures would be required for open-trench crossings, introducing further construction complexity.**ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1) also includes a comparison of environmental effects, engineering feasibility and cost considerations. The cost comparison exercise shows that an underground cable solution would be three to five times more costly that the proposed design for the 400 kV overhead line. The cost comparison between overhead lines and underground cables has been estimated using the Institute for Engineering and Technology (IET) Electricity Transmission Costs and Characteristics Report as a baseline, using the current DCO design parameters for the Grid Connection Route.
	2.9.26 In such cases the Secretary of State should only grant development consent for underground or subsea sections of a proposed line over an overhead alternative if they are satisfied that the benefits accruing from the former proposal clearly outweigh any extra economic, social, or environmental impacts that it presents, the mitigation hierarchy has been followed, and that any technical obstacles associated with it are surmountable. In this context it should consider: • The landscape and visual baseline characteristics of the setting of the proposed route, in particular, the impact on high sensitivity visual receptors (as defined in the current edition of the Landscape Institute's Guidelines for Landscape and Visual Impact Assessment), residential areas, designated landscapes, valued landscapes, designated heritage assets and Heritage Coasts (including, where relevant, impacts on the setting of designated features and areas), noting the policy in EN-1 paragraphs 5.4.13 – 5.4.14 on regional and local designations; • The additional cost of the proposed underground or sub-sea alternatives, including their significantly higher lifetime cost of repair and later uprating; • The potentially very disruptive effects of undergrounding on local communities, habitats, archaeological and heritage assets, marine environments, soil (including peat soils), hydrology, geology, and, for a substantial time after construction, landscape and visual amenity. (Undergrounding an overhead line will mean digging a trench along the	

	length of the route, and so such works will often be more disruptive – albeit temporarily – to the receptors listed above than would an overhead line of equivalent rating); • The potentially very disruptive effects of subsea cables on the seabed and the species that live in and on it, including physical damage to and full loss of seabed habitats. Cable protection can also be required where cables cross each other, or where they cannot be buried deep enough to protect them from becoming exposed. Such protection causes additional impacts that are often greater than those of the cable itself due to the large areas covered. There can also be issues where subsea cables make landfall, as much coastal land is protected habitat with environmental and heritage designations and landfall connections could cause additional disruption to coastal communities and the environment; • The applicant's commitment, as set out in their ES, to mitigate the potential detrimental effects of undergrounding works on any relevant agricultural land and soils (including peat soils), particularly regarding Best and Most Versatile land, including development and implementation of a Soil Resources and Management Plan. Such a commitment must guarantee appropriate handling of soil, backfilling, and return of the land to the baseline Agricultural Land Classification (ALC), thus ensuring no loss or degradation of agricultural land. Such a commitment should be based on soil and ALC surveys in line with the 1988 ALC criteria and due consideration of the Defra Construction Code of Practice for Sustainable Use of Soils on Construction Sites.	
2.9 Applicant Assessment - Noise and Vibration	2.9.27 All high voltage transmission lines have the potential to generate noise under certain conditions. 2.9.28 Line noise is most commonly caused by corona noise when the conductor surface electric stress exceeds the inception level for corona discharge activity which is released as acoustic energy and radiates into the air as sound. Transmission line conductors are normally designed to operate below this threshold. 2.9.29 Surface contamination on a conductor or accidental damage during transport or installation can cause local enhancement of electric stress and initiate discharge activity leading to the generation of additional noise. 2.9.30 The highest noise levels generated by a line generally occur during rain. 2.9.31 Water droplets may collect on the surface of the conductor and initiate corona discharges with noise levels being dependent on the level of rainfall. Fog may also give rise to increased noise levels, although these levels are lower than those during rain.	**ES Chapter 13: Noise and Vibration** (Doc Ref. 6.1) assesses the potential noise impacts associated with overhead line noise and operational phase plant noise. It aligns with guidance set out in relevant British Standards including BS 7445-1 and BS 4142 and BS 8233. Noise predictions of the operational Scheme have been undertaken using CadnaA® (v2025), which implements the calculation procedures of ISO 9613-2 to predict the propagation of noise away from the Scheme in all directions and to quantify resultant noise levels at the identified noise sensitive receptor locations. Operational noise from fixed plant has been assessed following BS 4142 guidance, whereby the rating level of noise emissions from fixed plant are compared against the background level of the pre-development noise climate. For overhead line noise, a Tier 1 (wet noise) assessment was carried out in the PEIR using criteria presented in PS(T)134. The results of the Tier 1 assessment identified that a Tier 2 assessment should be undertaken as part of the ES.

	2.9.32 After a prolonged spell of dry weather without rain to wash the conductors, contamination may accumulate at sufficient levels to result in increased noise. After heavy rain, these discharge sources are washed away and the line will resume normal quieter operating sound.	A Tier 2 assessment requires recalculation of the predicted noise level at the façade of the noise sensitive receptors (accounting for the duration of wet and dry weather); and recalculation of the noise criteria (accounting for the duration of wet and dry weather). The predicted noise levels for a Tier 2 assessment have been calculated according to guidance provided in TGN(E)322 Mitigation measures are proposed that can reduce overhead line noise as part of detailed design: • The most effective solution for reducing noise from high-voltage lines is through the use of multiple subconductors spaced by non-conductive spacers. This would increase the total conductor diameter, which would reduce corona discharge and so reduce noise. Similarly, a reduction in noise can also be achieved with a larger conductor diameter. • Use of hydrophilic coatings can also be effective at reducing noise in wet conditions, water droplets on the conductor's surface can increase corona noise. Hydrophilic coatings allow water to spread into a thin film rather than forming noise-generating droplets, which cause increased corona noise. • Increasing the distance between conductor groups reduces the electrostatic stress between them, which lowers the electric field and lessens corona formation. Having a longer crossarm length than 6.7m applied in overhead line noise calculations can reduce noise. With the adoption of these mitigation measures any residual adverse effects from overhead line noise would be minor and not significant. Mitigation measures are also proposed to minimise the impact of plant noise at the 400kV Substation and BESS Compound: • Transformers designed for low noise output (e.g. special core clamping, optimised magnetic design, vibration isolation) will be considered for the substation transformers in Land Parcel B. 'Low noise' versions of these transformers can reduce the emitted noise by up to 8 dB per transformer. • Utilisation of BESS containers with 'low noise' air-cooled heat exchanger designs should be considered in the BESS compound. 'Low noise' versions of BESS containers can reduce the noise emitted from each unit by up to 8 dB. With the adoption of these mitigation measures any residual adverse effects from operational plant noise would be minor and not significant.
	2.9.33 Surface grease on conductors can also give rise to audible noise effects as grease is able to move slowly under the influence of an electric field, tending to form points which then initiate discharge activity. Surface grease is likely to occur along the entire length of a conductor. Hence there may be many potential discharge sources and, consequently, a higher noise level.	
	2.9.34 This will only occur if substandard grease has been used during manufacture or if the conductor has been overheated by carrying excessive electrical load. This can be mitigated through good design or by replacement.	
	2.9.35 Transmission line audible noise is generally categorised as 'crackle' or 'hum', according to its tonal content.	
	2.9.36 Crackle may occur alone, but hum will usually occur only in conjunction with crackle. Crackle is a sound containing a random mixture of frequencies over a wide range, typically 1kHz to 10kHz. No individual pure tone can be identified for any significant duration. Crackle has a generally similar spectral content to the sound of rainfall. Hum is only likely to occur during rain when rates of rainfall exceed 1mm/hr. Hum is a sound consisting of a single pure tone or tones.	
	2.9.37 Noise may also arise from discharges on overhead line fittings such as spacers, insulators and clamps. Such noise should be mitigated through good design.	
	2.9.38 Audible noise effects can also arise from substation equipment such as transformers, quadrature boosters and mechanically switched capacitors.	
	2.9.39 Transformers are installed at many substations, and generate low frequency hum. Whether the noise can be heard outside a substation depends on a number of factors, including transformer type and the level of noise attenuation present (either engineered intentionally or provided by other structures).	
	2.9.40 For the assessment of noise from substations, standard methods of assessment and interpretation using the principles of the relevant British Standards are satisfactory.	
	2.9.41 For the assessment of noise from overhead lines, the applicant must use an appropriate method to determine the sound level produced by the line in both dry and wet weather conditions, in addition to assessing the impact on noise-sensitive receptors.	
	2.9.42 For instance, the applicant may use an appropriate noise modelling tool or tools for the prediction of overhead line noise and its propagation over distance, such as an ISO 9613-2 or Technical Report TR(T)94.	

	2.9.43 When assessing the impact of noise generated by overhead lines in wet weather relative to existing background sound levels, the applicant should consider the effect of varying background sound levels due to rainfall.	
	2.9.44 The Secretary of State is likely to regard it as acceptable for the applicant to use a methodology that demonstrably addresses these criteria.	
2.9 Applicant Assessment - **Electric and Magnetic Fields (EMF)**	2.9.45 Power frequency EMFs arise from generation, transmission, distribution and use of electricity and will occur around power lines and electric cables and around domestic, office or industrial equipment that uses electricity.	The Applicant does not anticipate any significant adverse EMF effects on any receptors. The **EMF Compliance Assessment** (Doc Ref. 7.8) comprises a high-level electromagnetic assessment, which includes assessment against the ICNIRP Exposure Limits 1998. The study sets out the proposed siting zone for the the overhead line, transformer and substations. The assessment recommends a minimum clearance distance of 25 m relative to public exposure limits for magnetic and electric fields and concludes that there would be no effects to sensitive receptors, human health, aquatic or terrestrial organisms.
	2.9.46 EMFs comprise electric and magnetic fields. Electric fields are the result of voltages applied to electrical conductors and equipment. Fences, shrubs and buildings easily block electric fields. Magnetic fields are produced by the flow of electric current; however, unlike electric fields, most materials do not readily block magnetic fields. The intensity of both electric fields and magnetic fields diminishes with increasing distance from the source.	
	2.9.47 All overhead power lines produce EMFs. These tend to be highest directly under a line and decrease to the sides at increasing distance. Although putting cables underground eliminates the electric field, they still produce magnetic fields, which are highest directly above the cable. EMFs can have both direct and indirect effects on human health, aquatic and terrestrial organisms.	
	2.9.48 The direct effects occur in terms of impacts on the central nervous system resulting in its normal functioning being affected. Indirect effects occur through electric charges building up on the surface of the body producing a microshock on contact with a grounded object, or vice versa, which, depending on the field strength and other exposure factors, can range from barely perceptible to being an annoyance or even painful.	
	2.9.49 To prevent these known effects, the International Commission on Non-Ionizing Radiation Protection (ICNIRP) developed health protection guidelines in 1998 for both public and occupational exposure. These are expressed in terms of the induced current density in affected tissues of the body, 'basic restrictions', and in terms of measurable 'reference levels' of electric field strength (for electric fields), and magnetic flux density (for magnetic fields). The relationship between the (measurable) electric field strength or magnetic flux density and induced current density in body tissues requires complex dosimetric modelling.	
	2.9.50 The reference levels are such that compliance with them will ensure that the basic restrictions are not reached or exceeded. Exceeding the reference levels does not necessarily mean that the basic restrictions will not be met; this would be a trigger for further investigation into the specific circumstances.	
	2.9.51 For protecting against indirect effects, the ICNIRP 1998 guidelines give an electric field reference of 5kV m-1 for the general public and keeping electric fields below this level would reduce the occurrence of adverse indirect effects for most	

	individuals to acceptable levels. When this level is exceeded, there is a suite of measures that may be called upon in particular situations, including provision of information, earthing and screening, alongside limiting the field. In some situations, there may be no reasonable way of eliminating indirect effects	
	2.9.52 The levels of EMFs produced by power lines in normal operation are usually considerably lower than the ICNIRP 1998 reference levels. For electricity substations, the EMFs close to the sites tend to be dictated by the overhead lines and cables entering the installation, not the equipment within the site.	
	2.9.53 The Stakeholder Advisory Group on extremely low frequency electric and magnetic fields (ELF EMFs) (SAGE) was set up to provide advice to government on possible precautionary measures that might be needed to limit public exposure to electric and magnetic fields associated with electricity supply. The government response to recommendations made in SAGE's first interim assessment sets out those measures that will be taken as a result of the recommendations.	
	2.9.54 The National Institute for Health Protection's (NIHP) Centre for Radiation, Chemical and Environmental Hazards (CRCE) provides advice on standards of protection for exposure to non-ionizing radiation, including the ELF EMFs arising from the transmission and use of electricity.	
	2.9.55 In March 2004, the National Radiological Protection Board (now part of NIHP CRCE), published advice on limiting public exposure to electromagnetic fields. The advice recommended the adoption in the UK of the EMF exposure guidelines published by ICNIRP in 1998.	
	2.9.56 These guidelines also form the basis of the Control of Electromagnetic Fields at Work Regulations 2016. Resulting from these recommendations, government policy is that exposure of the public should comply with the ICNIRP 1998 guidelines. The electricity industry has agreed to follow this policy. Applications should show evidence of this compliance as specified in paragraphs 2.10.11.	
	2.9.57 The balance of scientific evidence over several decades of research has not proven a causal link between EMFs and cancer or any other disease. The NIHP CRCE keeps under review emerging scientific research and/or studies that may link EMF exposure with various health problems and provides advice to the Department of Health and Social Care on the possible need for introducing further precautionary measures.	
	2.9.58 The Department of Health and Social Care's Medicines and Healthcare Products Regulatory Agency does not consider that transmission line EMFs constitute a significant hazard to the operation of pacemakers.	
	2.9.59 There is little evidence that exposure of crops, farm animals or natural ecosystems to transmission line EMFs has any agriculturally significant consequences.	

2.9 Applicant Assessment - Sulphur Hexafluoride	2.9.60 Sulphur Hexafluoride (SF6) is an insulating and arc-suppressant gas used in high-voltage switchgear for electricity networks.	The Scheme does not require the use of Sulphur Hexafluoride (SF6) as air-insulated substations are proposed.
	2.9.61 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.	
	2.9.62 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.	
	2.9.63 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.	
	2.9.64 In particular, an accounting of the cost differential between the SF6- reliant asset and the appropriate SF6-free alternative should be provided.	
	2.9.65 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.	
2.10 Mitigation - Biodiversity and Geological Conservation	2.10.2 Careful siting of a line away from, or parallel to, but not across, known flight paths can reduce the numbers of birds colliding with overhead lines considerably	Bird diverters are proposed to mitigate collision risk for wildfowl. Detailed assessment of impacts on migratory flight paths is included within **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3), considering proximity to gravel pits and the Wash SPA/Ramsar site. The **Design Parameters** (Doc Ref. 7.4), secure targeted bird flight diverters which will be fitted on spans of the 400kV overhead line identified by Vantage Point surveys/collision risk analysis as elevated risk (refer to Figure 4 of **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3)). The **Outline OEMP** (Doc Ref. 7.11) also includes measures in relation to the maintenance and post-installation monitoring of bird diverters, and adaptive refinement to add/ adjust diverters at any verified hotspot spans to reduce the risk of electrocution.. No residual significant adverse effects are report in relation to collision risk within **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1) and **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3).
	2.10.3 Making lines more visible by methods such as the fitting of bird flappers and diverters to the earth wire, which swivel in the wind, glow in the dark and use of fluorescent colours designed specifically for bird vision can also reduce the risk of bird collisions and number of potential deaths. The design and colour of the diverters will be specific to the conditions – the line and pylon/transmission tower specifications and the species at risk.	
	2.10.4 Electrocution risks can be reduced through the design of lattice steel tower crossarms, insulators and the construction of other parts of high voltage power lines so that birds find no opportunity to perch near energised power lines on which they might electrocute themselves.	
2.10 Mitigation - Landscape and Visual	2.10.5 In addition to good design in accordance with the Holford and Horlock rules (please see paragraphs 2.9.16 - 2.9.19) and the ETDP once published (paragraph 2.9.20), and the consideration of undergrounding or rerouting the line where possible, the principal opportunities for mitigating adverse landscape and visual impacts of electricity networks infrastructure are: • Consideration of network reinforcement options (where alternatives exist) which may allow improvements and/or extensions to an existing line rather than the building of an entirely new line;	**ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1) describes the alternatives considered in relation to electricity infrastructure networks, including the consideration of undergrounding and routing. **The Design Approach Document** (Doc Ref. 7.3) describes the process the Applicant took throughout design development including reconfiguration and rationalisation of the overhead lines. The annexes provides an assessment against the Holford and Horlock Rules. These documents also take into account the selection of the preferred pylon structures for the Scheme.

	• Selection of the most suitable type and design of support structure in order to minimise the overall visual impact on the landscape. In particular, ensuring that towers are of the smallest possible footprint and internal volume; and • The rationalisation, reconfiguration, and/or undergrounding of existing electricity networks infrastructure in the vicinity of the proposed development.	The Applicant considered a direct connection (tee-off) into the proposed Grimsby to Walpole transmission line being developed by National Grid Electricity Transmission (NGET). The Applicant requested NGET consider approving a 'tee-in' connection to the planned Grimsby to Walpole scheme. This scheme comprises a new high voltage transmission line which passes close to Land Parcel D of the Solar Development Area. A tee-in would avoid the requirement for a connection directly into the planned Weston Marsh substation, thus substantially reducing the length of the overhead line required and therefore potential landscape and visual impacts. NGET advised that it would not provide for a tee-in connection and on this basis, only a connection into the future Weston Marsh Substation was considered deliverable for the grid connection. As part of the Grimsby to Walpole, the existing 2SV 400kV line would be dismantled and replaced by new grid infrastructure.
	2.10.6 Additionally, there are more specific measures that might be taken, and which the Secretary of State could mandate through DCO requirements if appropriate, as follows: • Landscaping schemes, comprising off-site tree and hedgerow planting, are sometimes used for larger new overhead line projects to mitigate potential landscape and visual impacts, softening the effect of a new above ground line whilst providing some screening from important visual receptors. These may be implemented with the agreement of the relevant landowner(s), or the developer may compulsorily acquire the land or land rights in question. Advice from the relevant statutory authority should be sought on the design of such schemes, with particular consideration given to the selection of species mix which is appropriate to the local landscape character; and • Screening, comprising localised planting in the immediate vicinity of residential properties and principal viewpoints can also help to screen or soften the effect of the line, reducing the visual impact from a particular receptor.	Section 12.7 Embedded Mitigation of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1) and the **Outline LEMP** (Doc Ref. 7.16) set out the landscape mitigation measures for the Scheme. Landscape screening of the overhead line infrastructure is not proposed because the scale and functional requirements of the infrastructure preclude further screening or landform modification without compromising safety and operational integrity.
	2.10.7 As set out in the paragraphs above, where landscaping schemes and/or screening mitigation of the kind described above is required, rights over the land necessary for such measures may be compulsorily acquired as part of the DCO.	
	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 **Outline OEMP** (Doc Ref. 7.11) and **Outline LEMP** (Doc Ref. 7.16) sets out the commitments and mitigation during the operational phase of the Scheme.

2.10 Mitigation - Noise and Vibration	2.10.9 Applicants must consider the following measures: • The positioning of lines to help mitigate noise; • Ensuring that the appropriately sized conductor arrangement is used to minimise potential noise; • Quality assurance through manufacturing and transportation to avoid damage to overhead line conductors which can increase potential noise effects; • Ensuring that conductors are kept clean and free of surface contaminants during stringing/installation; and • The selection of quieter cost-effective plants.	The Applicant has considered additional mitigation measures to minimise the impacts of overhead line noise and operational plant noise as set out in response to paragraphs 2.9.27 to 2.9.44 above.
	2.10.10 In addition, the ES should include information on planned maintenance arrangements. Where detail is not included, the Secretary of State should consider stipulating appropriate maintenance arrangements by way of requirements attached to any grant of development consent.	The **Outline OEMP** (Doc Ref. 7.11) sets out the maintenance and monitoring requirements to ensure that noise and vibration impacts continue to be managed throughout the lifetime of the Scheme.
2.10 Mitigation - Electric and Magnetic Fields (EMFs)	2.10.11 The applicant should consider the following factors: • Height, position, insulation and protection (electrical or mechanical as appropriate) measures subject to ensuring compliance with the Electricity Safety, Quality and Continuity Regulations 2002; • That optimal phasing of high voltage overhead power lines is introduced wherever possible and practicable in accordance with the Code of Practice to minimise EMFs; and • Any new advice emerging from the Department of Health and Social Care relating to government policy for EMF exposure guidelines.	The Scheme design will ensure compliance with Electricity Safety, Quality and Continuity Regulations 2002[1] and the assets associated with the Scheme will be fully compliant with the relevant Government policy. Additionally, the EMF levels resulting from the Scheme would be below the relevant 1998 International Commission on the Non-Ionizing Radiation Protection (ICNIRP) reference levels. Further information is provided within the **EMF Compliance Assessment** (Doc Ref. 7.8) and **ES Chapter 16: Other Environmental Topics,** Section 16.3 Electric and Magnetic Fields (Doc Ref. 6.1).
	2.10.12 Where it can be shown that the line will comply with the current public exposure guidelines and the policy on phasing, no further mitigation should be necessary.	EMF levels resulting from the Scheme would be below the relevant 1998 ICNIRP reference levels. Further information is provided within the **EMF Compliance Assessment** (Doc Ref. 7.8) and **ES Chapter 16: Other Environmental Topics,** Section 16.3 Electric and Magnetic Fields (Doc Ref. 6.1). It concludes: • Where 132kV underground cables are proposed, there is no need for any clearance distance to any locations where public exposure levels will be relevant. This is because the typical magnetic (9.62 µT) and electric field (0 kV/m-1) levels at one metre above ground are below the reference level from the public exposure limits in UK policy. • The typical magnetic field produced by the overhead lines is predicted to be 1 µT. The magnetic field value is therefore below the reference level from the public exposure limits in the UK policy. The typical electric field produced by the overhead
	2.10.13 Where EMF exposure is within the relevant public exposure guidelines, re-routeing a proposed overhead line purely on the basis of EMF exposure or undergrounding a line solely to further reduce the level of EMF exposure are unlikely to be proportionate mitigation measures.	

[1] HM Government (2002). Electricity Safety, Quality and Continuity Regulations 2002. Available at: https://www.legislation.gov.uk/uksi/2002/2665/contents/made [Accessed 13 October 2025]

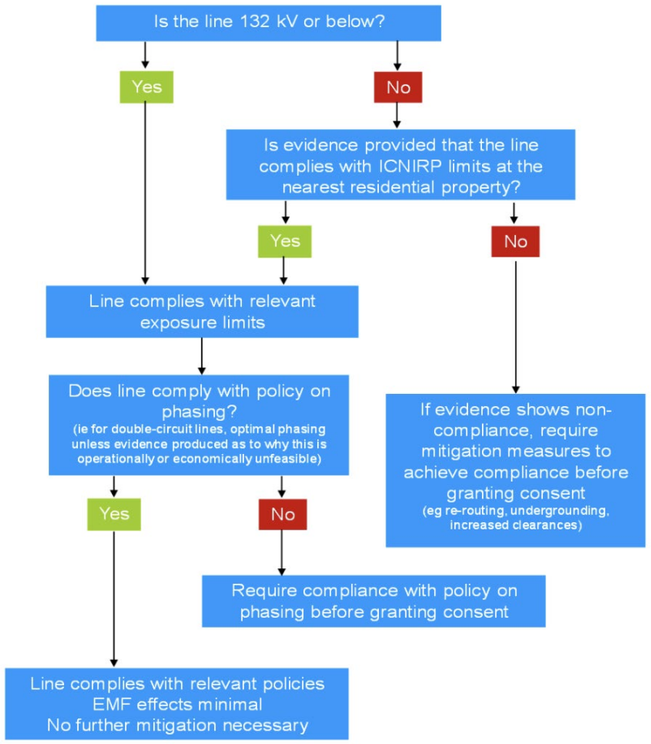
		lines is predicted to be 0.6 kV/m^{-1}. The electric field levels are therefore below the reference level from the public exposure limits in UK policy. • The typical magnetic field produced by the overhead lines is predicted to be 6.4 µT. The magnetic field value is therefore below the reference level from the public exposure limits in the UK policy. The typical electric field produced by the overhead lines is predicted to be 4.2 kV/m-1. The electric field levels are therefore below the reference level from the public exposure limits in UK policy. When considering the worst-case cumulative fields when directly under a 400 kV overhead powerline and 80m from another 400kV overhead powerline, the magnetic and electric fields remain below the ICNIRP reference levels. Where 400 kV underground cables are proposed, there is no requirement for any clearance distance to locations. This is because the typical magnetic field values (approximately 25 µT directly above the cable route) remain below the reference levels set for public exposure under current UK policy.
2.10 Mitigation - Sulphur Hexafluoride	2.10.14 The climate-warming potential of SF6 is such that applicants should, as a rule, avoid the use of SF6 in new developments.	The Scheme does not require the use of Sulphur Hexafluoride (SF6) as air-insulated substations are proposed.
	2.10.15 Where no proven SF6-free alternative is commercially available, and where the cost of procuring a bespoke alternative is grossly disproportionate, the continued use of SF6 is acceptable, provided that emissions monitoring and control measures compliant with the F-gas Regulation and/or its successors are in place.	
2.11 Secretary of State Decision Making - Biodiversity and Geological conservation	2.11.1 Where biodiversity impacts are identified, including those associated with bird collision with overhead lines, the Secretary of State should be satisfied that all feasible options for mitigation have been considered and evaluated appropriately	**ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1) and **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3) describe the mitigation options considered to manage bird collision risk with the overhead lines. The **Design Parameters** (Doc Ref. 7.4), secure targeted bird flight diverters which will be fitted on spans of the 400kV overhead line identified by Vantage Point surveys/collision risk analysis as elevated risk (refer to Figure 4 of **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3)). The **Outline OEMP** (Doc Ref. 7.11) also includes measures in relation to the maintenance and post-installation monitoring of bird diverters, and adaptive refinement to add/ adjust diverters at any verified hotspot spans. No residual significant adverse effects are report in relation to collision risk within **ES Chapter 9: Ecology and Biodiversity** (Doc Ref. 6.1) and **ES Appendix 9-14: HRA Report** (Doc Ref. 6.3).
2.11 Secretary of State Decision Making - Landscape and Visual	2.11.2 The Secretary of State should be satisfied that the development, so far as is reasonably possible, complies with the Holford and Horlock Rules (please see paragraphs 2.9.16 - 2.9.19) or any updates to them and has had regard to the ETDP (please see paragraph 2.9.20) once published.	The Applicant has taken into account the Holford and Horlock Rules when routing/siting the overhead lines and substations that form part of the Scheme. The **Design Approach Document** (Doc Ref. 7.3) demonstrates how each of these rules has been applied to the Scheme.
	2.11.3 The Secretary of State should also be satisfied that all feasible options for mitigation, including the rationalisation, reconfiguration, or undergrounding of existing electricity networks infrastructure, have been considered and evaluated appropriately.	**ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1) describes the alternatives considered in relation to electricity infrastructure networks. **The Design Approach Document** (Doc Ref. 7.3) describes the process the Applicant took throughout design development including reconfiguration and rationalisation of the overhead lines.

		The Applicant considered a direct connection (tee-off) into the proposed Grimsby to Walpole transmission line being developed by National Grid Electricity Transmission (NGET). The Applicant requested NGET consider approving a 'tee-in' connection to the planned Grimsby to Walpole scheme. This scheme comprises a new high voltage transmission line which passes close to Land Parcel D of the Solar Development Area. A tee-in would avoid the requirement for a connection directly into the planned Weston Marsh substation, thus substantially reducing the length of the overhead line required. NGET advised that it would not provide for a tee-in connection and on this basis, only a connection into the future Weston Marsh Substation was considered deliverable for the grid connection. As part of the Grimsby to Walpole, the existing 2SV 400kV line would be dismantled and replaced by new grid infrastructure.
	2.11.4 In circumstances where it can be demonstrated that a mitigation measure and/or technological approach is appropriate and/or necessary for a project, including to limit landscape and visual impact as set out above, the Secretary of State should take this into account in decision making.	Section 12.7 Embedded Mitigation of **ES Chapter 12: Landscape and Visual** (Doc Ref. 6.1) and the **Outline LEMP** (Doc Ref. 7.16) set out the landscape mitigation measures for the Scheme. Landscape screening of the overhead line infrastructure is not proposed because the scale and functional requirements of the infrastructure preclude further screening or landform modification without compromising safety and operational integrity.
	2.11.5 Nationally designated landscapes have specific statutory purposes. The Secretary of State should have special regard to nationally designated landscapes, where the general presumption in favour of overhead lines should be reversed to favour undergrounding. In addition, the Secretary of State must seek to further the purpose(s) of designated landscapes when making decisions which effect land within the designated area. EN-1 (Section 5.10) and paragraphs 2.9.7 to 2.9.26 above have further guidance on this requirement.	N/A – The Scheme is not proposed in any National Parks, the Broads or National Landscapes.
	2.11.6 Away from designated landscapes and in locations where there is a high potential for widespread and significant adverse landscape and/or visual impacts, the Secretary of State should be satisfied that the applicant has provided evidence to support a decision on whether undergrounding is or is not appropriate, having considered this on a case-by-case basis, weighing the considerations in paragraph 2.9.25 above.	All landscape and visual effects reported with respect to Grid Connection Route infrastructure are moderate adverse effects. The cumulative effects assessment does not report an increase in the significance of the adverse effects as a result of additional overhead line infrastructure associated with the Grimsby to Walpole and Weston Marsh to East Leicestershire overhead line projects. No significant adverse effects have been specifically identified in relation to the presence of the overhead Inter-Array Connection Area infrastructure (also classed as an NSIP). Notwithstanding the above, the Applicant has provided an indication of the costs and benefits of feasible alternatives within **ES Chapter 3: Alternatives and Design Evolution** (Doc Ref. 6.1), however the effects associated with the overhead line NSIPs are not considered to be 'particularly significant' to necessitate the detailed consideration of alternatives prescribed in paragraph 2.9.15 of EN-5. Further paragraph 2.9.24 of EN-5 states that "*cases will arise where, though no part of the proposed development crosses a designated landscape, a high potential for widespread and significant adverse landscape and/or*

		visual impacts along certain sections of its route may result in recommendations to use underground for relevant segments of the line". While there is no definition within EN-5 as to what may be deemed particularly significant, the Applicant has understood this to be those effects that exceed moderate adverse significance, which is not the case for the overhead line infrastructure, including in the cumulative effects assessment. Additionally, there is no specific segment of the Grid Connection Route where greater landscape or visual effects are reported.
2.11 Secretary of State Decision Making - Noise and Vibration	2.11.7 The Secretary of State should ensure that appropriate assessment methodologies have been used in the evidence presented to it, and that the appropriate mitigation options have been considered and adopted. Where the applicant can demonstrate that appropriate mitigation measures will be put in place, the residual noise impacts are unlikely to be significant.	**ES Chapter 13: Noise and Vibration** (Doc Ref. 6.1) sets out the assessment methodology for assessing noise and vibration impacts from the Scheme. As set out earlier in response to paragraphs 2.9.27 to 2.9.44, the Applicant has secured mitigation measures within the **Outline OEMP** (Doc Ref. 7.11) and there are no residual significant adverse effects.
	Consequently, noise from overhead lines is unlikely to lead to the Secretary of State refusing an application, but it may need to consider the use of appropriate requirements in the DCO to ensure noise is minimised as far as is practicable	As set out in **ES Chapter 13: Noise and Vibration** (Doc Ref. 6.1), no residual significant adverse effects relating to overhead line noise are reported. Mitigation measures are secured within the **Outline OEMP** (Doc Ref. 7.11) which are attached to the **Draft DCO** (Doc Ref. 3.1) via a requirement to ensure noise is minimised as far as practicable.
2.11 Secretary of State Decision Making - Electric and Magnetic Fields (EMFs)	2.11.9 This NPS does not repeat the detail of the ICNIRP 1998 guidelines on restrictions or reference levels. The government has developed with the electricity industry a Code of Practice, 'Power Lines: Demonstrating compliance with EMF public exposure guidelines – a voluntary Code of Practice'32, published in February 2011 that specifies the evidence acceptable to show compliance with ICNIRP 1998 guidelines and is also in line with the terms of the 1999 EU Council Recommendation on EMF exposure.	EMF levels resulting from the Scheme would be below the relevant 1998 ICNIRP reference levels. Further information is provided within the **EMF Compliance Assessment** (Doc Ref. 7.8) and **ES Chapter 16: Other Environmental Topics,** Section 16.3 Electric and Magnetic Fields (Doc Ref. 6.1).
	2.11.10 Before granting consent to an overhead line application, the Secretary of State should be satisfied that the proposal is in accordance with the guidelines, considering the evidence provided by the applicant and any other relevant evidence. It may also need to take expert advice from the Department of Health and Social Care.	
	2.11.11 Industry currently applies optimal phasing to 275kV and 400kV overhead lines voluntarily wherever operationally possible, which helps to minimise the effects of EMF. The government has developed with industry a voluntary Code of Practice, 'Optimum Phasing of high voltage double-circuit Power Lines – A Voluntary Code of Practice', published in March 2012, that defines the circumstances where industry can and will optimally phase lines with a voltage of 132kV and above.	The Scheme proposes a single-circuit 400kV overhead line and, therefore, the guidance on optimal phasing is not applicable to the Scheme.
	2.11.12 Where the applicant cannot demonstrate that the line will be compliant with the Electricity Safety, Quality and Continuity Regulations 2002, with the	The Scheme design will ensure compliance with Electricity Safety, Quality and Continuity Regulations 2002[2] and the assets associated with the Scheme will be fully compliant with

[2] HM Government (2002). Electricity Safety, Quality and Continuity Regulations 2002. Available at: https://www.legislation.gov.uk/uksi/2002/2665/contents/made [Accessed 13 October 2025]

	exposure guidelines as specified in the Code of Practice on compliance, and with the policy on phasing as specified in the Code of Practice on optimal phasing, then the Secretary of State should not grant consent.	the relevant Government policy. The Scheme proposes a single-circuit 400kV overhead line and, therefore, the guidance on optimal phasing is not applicable to the Scheme. Additionally, the EMF levels resulting from the Scheme would be below the relevant 1998 ICNIRP reference levels. Further information is provided within the **EMF Compliance Assessment** (Doc Ref. 7.8) and **ES Chapter 16: Other Environmental Topics,** Section 16.3 Electric and Magnetic Fields (Doc Ref. 6.1).
	2.11.13 Undergrounding of a line would reduce the level of EMFs experienced, but high magnetic field levels may still occur immediately above the cable. It is the government's policy that power lines should not be undergrounded solely for the purpose of reducing exposure to EMFs.	EMF levels resulting from the Scheme would be below the relevant 1998 ICNIRP reference levels. Further information is provided within the **EMF Compliance Assessment** (Doc Ref. 7.8) and **ES Chapter 16: Other Environmental Topics,** Section 16.3 Electric and Magnetic Fields (Doc Ref. 6.1).
	2.11.14 In order to avoid unacceptable adverse impacts of EMFs from electricity network infrastructure on communication, navigation and surveillance infrastructure, the Secretary of State will take account of statutory technical safeguarding zones defined in accordance with Planning Circular 01/0335, or any successor, when considering recommendations for DCO applications. More detail on this issue can be found in Section 5.5 of EN-1.	As set out in **ES Chapter 16: Other Environmental Topics** (Doc Ref. 6.1), the Order Limits are not within the safeguarding zone of any safeguarded civil aerodrome as listed on Annex 3 of the Planning Circular 01/03. Therefore, the levels of EMF experienced by potential aviation receptors, including their communication, navigation and surveillance infrastructure, is considered to be negligible.
	2.11.15 Where a statutory consultee on the safeguarding of technical facilities identifies a risk that the EMF effect of electricity network infrastructure would compromise the effective and safe operation of such facilities, the potential impact and siting and design alternatives will need to have been fully considered as part of the application.	No concerns regarding the safeguarding of technical facilities due to EMFs have been raised during pre-application consultation with statutory consultees (refer to the **Consultation Report** (Doc Ref. 5.1)). EMFs are assessed within Section 16.3: Electric and Magnetic Fields of **ES Chapter 16: Other Environmental Topics** (Doc Ref. 6.1), based on information provided within the **EMF Compliance Assessment** (Doc Ref. 7.8).
	2.11.16 The diagram below shows a basic decision tree for dealing with EMFs from overhead power lines.	Noted. The Applicant has complied with this decision tree.

		
2.11 Secretary of State Decision Making - Sulphur Hexafluoride	2.11.17 The Secretary of State should grant consent for an electricity networks development only if the applicant has demonstrated either: i. That the development will not use SF6; or ii. (a) That there is no proven commercially available alternative to the use of SF6; and (b) That a bespoke SF6-free alternative would be grossly disproportionate in terms of cost; and (c) That emissions monitoring and control measures compliant with the F-gas Regulation and/or its successors are in place	The Scheme does not require the use of Sulphur Hexafluoride (SF6) as air-insulated substations are proposed.