Green Hill Solar Farm
EN010170

Policy Compliance Document
Revision B

Prepared by: Lanpro

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APFP Regulation 5(2)(q)

Schedule of Changes

Revision	Section Reference	Description of Changes	Reason for Revision
A	[cover]	Updated to Revision A	As required for submission at Deadline 1.
	[throughout]	Updates to document references	As required for submission at Deadline 1.
	Pgs. 22, 33, 38 and 105	Updates to policies relating to the emerging Milton Keynes City Council Local Plan	Emerging Milton Keynes City Council Local Plan moving to Regulation 19 consultation stage
B	[cover]	Updated to Revision B	As required for submission at Deadline 4.
	[throughout]	Updates to document references	As required for submission at Deadline 4.
	[throughout]	Updates to reflect the updated NPSs	Updated NPS published in December 2025

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Issue Sheet

Report Prepared for: Green Hill Solar Farm

Examination Deadline 4

Policy Compliance Document
Revision B

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1 Introduction

1.1 Overview

1.1.1 Green Hill Solar Farm Limited (the Applicant) has prepared this Policy Compliance Document (PCD) as part of the application for a Development Consent Order (DCO) to construct, operate, maintain and decommission the Green Hill Solar Farm (the Scheme).

1.2 Purpose of the Document

1.2.1 The PCD sets out how the Scheme accords with relevant national and local planning policy. It should be read in conjunction with the Planning Statement (PS) **[EX4/GH7.15_B]**, which sets out the legislative and policy background to the Scheme.

1.3 The Scheme

1.3.1 The DCO application is for the construction, operation (including maintenance) and decommissioning of the Scheme. The Scheme consists of a solar photovoltaic (PV) array electricity generating station, energy storage facility and grid connection to the national electricity transmission network (NETS).

1.3.2 The Scheme is located within the administrative boundaries of North Northamptonshire and West Northamptonshire with Green Hill G and part of the Cable Route Corridor within the administrative boundary of Milton Keynes City, shown on the Location Plan **[REP3-004]**.

1.3.3 The Scheme will be within the 'Order Limits', which is shown on the Works Plan **[REP3-008]**. The land within the Order Limits comprises nine sites and the land required for the grid connection, referred to as the Cable Route Corridor.

1.3.4 The Scheme would generate large amounts of electricity from a renewable source and so would assist the Government in meeting its targets for net zero 2050.

1.3.5 A detailed description of the Scheme is provided in the Environmental Statement Chapter 4: Scheme Description **[REP1-031]**.

1.4 Overview and Structure

1.4.1 This PCD is structured as follows:

- Section 1: Introduction;
- Section 2: National Policy Accordance Tables; and
- Section 3: Local Policy Accordance Tables.

2 National Policy Accordance Tables

2.1 National Policy Statement EN-1

Table 1: National Policy Statement EN-1 (November 2023)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Paragraph 2.1.3	To produce enough energy required for the UK and ensure it can be transported to where it is needed, a significant amount of infrastructure is needed at both local and national scale. High quality infrastructure is crucial for economic growth, boosting productivity and competitiveness. Part 3 of this NPS provides further details on the need for and importance of energy to economic prosperity and social well-being.	As explained in the Statement of Need (SoN) **[APP-556]** and summarised in Sections 4 and 6 of the Planning Statement **[EX4/GH7.15_B]**, the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable and low carbon-electricity generation system which is sufficient to meet future demand. This will help to meet the need for new energy structure that is crucial for economic growth, boosting productivity and competitiveness, as identified by this policy. The Scheme will quickly deliver significant amounts of low carbon power. Solar is also relatively quick to construct compared to other technologies which have longer construction timeframes or have potentially not yet been proven at scale.
Paragraph 2.2.1	In June 2019, the UK became the first major economy to legislate for a 2050 net zero Greenhouse Gases ('GHG') emissions target through the Climate Change Act 2008 (2050 Target Amendment) Order 2019. In December 2020, the UK communicated its Nationally Determined Contributions to reduce GHG emissions by at least 68 per cent from 1990	Chapter 7 Climate Change of the ES **[APP-044]** presents a lifecycle greenhouse gas (GHG) impact assessment which considers the lifetime emissions and effects of the Scheme. This concludes that over its 60-year operational

Table 1: National Policy Statement EN-1 (November 2023)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	levels by 2030. In April 2021, the Government legislated for the sixth carbon budget (CB6), which requires the UK to reduce GHG emissions by 78% by 2035 compared to 1990 levels.	lifetime the Scheme will produce 37.12TWh or 34.35TWh of electricity with an average operational greenhouse gas intensity of 0.034 to 0.037 grammes of carbon dioxide equivalent per kWh (gCo2e/kWh). This demonstrates its very low carbon attributes compared with the average emissions from the grid and other non-renewable forms of electricity generation, providing an overall beneficial impact in relation to the UK meeting its carbon reduction targets and therefore represents a major beneficial effect on the climate.
Paragraph 2.3.3	Our objectives for the energy system are to ensure our supply of energy always remains secure, reliable, affordable, and consistent with meeting our target to cut GHG emissions to net zero by 2050, including through delivery of our carbon budgets and Nationally Determined Contribution. This will require a step change in the decarbonisation of our energy system.	As explained in the SoN **[APP-556]** and summarised in Sections 4 and 6 of the Planning Statement **[EX4/GH7.15_B]**, the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change, including the legally binding emissions reduction target for 2050 and carbon budgets described by this policy.

Table 1: National Policy Statement EN-1 (November 2023)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		The Scheme incorporates Battery Energy Storage System (BESS) which is an important aspect of regularising the supply of electricity from renewable energy production such as solar PV.
Paragraph 2.3.4	Meeting these objectives necessitates a significant amount of energy infrastructure, both large nationally significant developments and small-scale developments determined at a local level. This includes the infrastructure needed to convert primary sources of energy (e.g. wind) into energy carriers (e.g. electricity or hydrogen), and to store and transport primary fuels and energy carriers into and around the country. It also includes the infrastructure needed to capture, transport and store carbon dioxide. The requirement for new energy infrastructure will present opportunities for the UK and contributes towards our ambition to support jobs in the UK's clean energy industry and local supply chains.	As explained in the SoN **[APP-556]** and summarised in Sections 4 and 6 of the Planning Statement **[EX4/GH7.15_B]**, the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity, in direct accordance with this policy, to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change.
Paragraph 2.3.5	The sources of energy we use will also need to change. Since the industrial revolution, our energy system is dominated by fossil fuels. That remains the case today. Although representing a record low, fossil fuels still accounted for just over 76 per cent of energy supply in 2020. We need to dramatically increase the volume of energy supplied from low carbon sources.	As explained in the SoN **[APP-556]**, the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low carbon electricity, in direct accordance with this policy, to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change.

Table 1: National Policy Statement EN-1 (November 2023)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Paragraph 2.3.7	Decarbonisation means we are likely to become more dependent on some forms of energy compared to others. Using electrification to reduce emissions in large parts of transport, heating and industry could lead to more than half of final energy demand being met by electricity in 2050, up from 17 per cent in 2019, representing a doubling in demand for electricity. Low carbon hydrogen is also likely to play an increasingly significant role.	As explained in the SoN **[APP-556]** and summarised in Sections 4 and 6 of the Planning Statement **[EX4/GH7.15_B]**, the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change, including the legally binding emissions reduction target for 2050 and carbon budgets described by this policy. The Statement of Need **[APP-556]** also explains that solar generation is expected to be an important part of the future energy mix.
Paragraph 2.5.1	Given the vital role of energy to economic prosperity and social well-being, it is important that our supplies of energy remain secure, reliable and affordable.	The SoN **[APP-556]** set out the need for decarbonisation in order to support the government's ambitious plans to achieve net zero by 2050. There is also need to enable the country has accessible to safe, reliable and affordable energy to reduce the reliance of imported energy such as gas and reduce greenhouse gas. Solar energy such that that which would be provided by the Scheme would make a significant contribution towards securing low carbon solar energy provision which is urgently need in the UK. Solar energy such as

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		that proposed is a reliable source of energy in the UK which is capable of rapid rollout once consented and provides the cheapest form of electricity generation. The Scheme will as part of other similar Schemes help towards providing a reliable and affordable supply of electricity which will mean affordable bills for households and businesses.
Paragraph 3.1.1 Paragraph 3.1.2	This part of the NPS explains why the government sees a need for significant amounts of new large-scale energy infrastructure to meet its energy objectives and why the government considers that the need for such infrastructure is urgent. However, it will not be possible to develop the necessary amounts of such infrastructure without some significant residual adverse impacts. These effects will be minimised by the application of policy set out in Parts 4 and 5 of this NPS. See also Part 2 of each technology specific NPS.	As explained in the SoN **[APP-556]** and summarised in Sections 4 and 6 of the Planning Statement **[EX4/GH7.15_B]**, the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change. An EIA has been undertaken to assess the environmental impacts of the Scheme and an ES **[APP-037 to APP-544]** prepared to report the findings. Overall, with appropriate mitigation implemented, this identifies the residual significant adverse effects of the Scheme. When considered relative to the large-scale nature of the Scheme, these effects are

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		considered to be outweighed by the significant national benefits that the Scheme will provide much needed large-scale renewable energy generation. Section 6 of the Planning Statement **[EX4/GH7.15_B]** sets out the detailed consideration of the Scheme's compliance with policy, taking account of the significant effects identified in the ES **[APP-037 to APP-544]** and Section 7 of the Planning Statement **[EX4/GH7.15_B]** considers the planning balance, taking account of its benefits and effects.
Paragraph 3.2.1	The government's objectives for the energy system are to ensure our supply of energy always remains secure, reliable, affordable, and consistent with net zero emissions in 2050 for a wide range of future scenarios, including through delivery of our carbon budgets and National Determined Contributions.	As explained in the SoN **[APP-556]** the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity, in direct accordance with this policy, to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change.
Paragraph 3.2.3	It is not the role of the planning system to deliver specific amounts or time limit any form of infrastructure covered by this NPS, it is for industry to prose new energy infrastructure projects that they assess to be viable within the strategic framework set by government. This is the nature of a market-based energy system. With the exception of new coal or large-	As per this policy, the Applicant proposes the Scheme by way of a DCO application.

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	scale oil fire electricity generation, the government does not consider it appropriate for planning policy to set limits on different technologies but planning policy can be used to support the government's ambitions in energy policy and other policy areas.	
Paragraph 3.2.4	It is not the government's intention in presenting any of the figures or targets in this NPS to propose limits on any new electricity that can be consented in accordance with energy NPSs. A large number of consented projects can help deliver an affordable electricity system, by driving competition and reducing costs within and amongst different technology and infrastructure types. Consenting new projects also enables projects utilising more advanced technology and greater efficiency to come forward. The delivery of an affordable energy system does not always mean picking the least cost technologies. A diversity of supply can aid in ensuring affordability for the system overall and relative costs can change over time, particularly for new and emerging technologies. It is not the role of the planning system to compare the costs of individual developments or technology types.	As explained in the SoN **[APP-556]**, the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change. This Paragraph further emphasises the scale of the urgent need and establishes that the fact there may be other similar schemes in the planning system is not a reason to limit the number of approvals. A large number of approved schemes is beneficial in terms of enabling the market to efficiently deliver the infrastructure that is needed.
Paragraph 3.2.6	The Secretary of State should assess all applications for development consent for the types of infrastructure covered by the energy NPS on the basis that the government has demonstrated that there is a need for those types of infrastructure, which is urgent, as described for each of them in this Part.	As explained in the SoN **[APP-556]** and summarised in Sections 4 and 6 of the Planning Statement **[EX4/GH7.15_B]**, the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low carbon electricity to help meet the UK's urgent need to

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change. The Applicant notes that, in accordance with this policy, the need infrastructure such as the Scheme, is acknowledged, and the application should be considered on the basis that the need has been demonstrated.
Paragraph 3.2.7	In addition, the Secretary of State has determined that substantial weight should be given to this need when considering applications for development consent under the Planning Act 2008.	As explained in the SoN **[APP-556]** and summarised in Sections 4 and 6 of the Planning Statement **[EX4/GH7.15_B]**, the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low carbon electricity to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change. As per this policy, the established urgent need for the Scheme should be given substantial weight in the decision. The Applicant notes that, in accordance with this policy, the need for infrastructure, such as

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		the Scheme, is urgent and considers that the Secretary of State should give substantial weight to this in their decision.
Paragraph 3.3.3	To ensure that there is sufficient electricity to meet demand, new electricity infrastructure will have to be built to replace output from retiring plants and to ensure we can meet increased demand. Our analysis suggests that even with major improvements in overall energy efficiency, and increased flexibility in the energy system, demand for electricity is likely to increase significantly over the coming years and could more than double by 2050 as large parts of transport, heating and industry decarbonise by switching from fossil fuels to low carbon electricity. The Impact Assessment for CB6 shows an illustrative range of 465-515TWh in 2035 and 610-800TWh in 2050.	As explained in the SoN **[APP-556]** and summarised in Sections 4 and 6 of the Planning Statement **[EX4/GH7.15_B]** the Scheme will help meet the demand for energy which is expected to rise substantially in the future.
Paragraph 3.3.8	The government has considered alternatives to the need for new large-scale electricity infrastructure and concluded that these would be limited to reducing total demand for electricity through efficiency measure or through greater use of low carbon hydrogen in decarbonising the economy; reducing maximum demand through demand side response; and increasing the contribution of decentralised and smaller-scale electricity infrastructure. In addition, there are alternative ways of decarbonising heating and transportation, which are being developed alongside electrification of these sectors.	The SoN **[APP-556]** provides detailed information on why large-scale solar is needed alongside other forms of generation. As per Paragraph 3.2.6, the Scheme should be considered on the basis that its need is established, and this established and urgent need should be given substantial weight in the decision.
Paragraph 3.3.10	The precise level of electricity demand during the transition to net zero is uncertain and could be affected by alternative means of decarbonising these sectors, such as the use of low carbon hydrogen, and the pace of that decarbonisation. However, it is prudent to plan on a conservative	The SoN **[APP-556]** provides detailed information on future energy demand, how this has been identified and how the Scheme is well-suited to help meet this demand.

Table 1: National Policy Statement EN-1 (November 2023)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	basis to ensure that there is a sufficient supply of electricity to meet demand across a wide range of future scenarios, including where the use of hydrogen is limited.	As per Paragraph 3.2.6, the Scheme should be considered on the basis that its need is established, and this established and urgent need should be given substantial weight in the decision.
Paragraph 3.3.12	Decentralised and community energy systems such as micro-generation contribute to our targets on reducing carbon emissions and increasing energy security. These technologies could also lead to some reduction in demand on the main generation and transmission system. However, the government does not believe they will replace the need for new large-scale electricity infrastructure to meet our energy objectives. This is because connection of a large-scale, centralised electricity generating facilities via a high voltage transmission system enables the pooling of both generation and demand, which in turn offers a number of economic and other benefits, such as more efficient bulk transfer of power and enabling surplus generation capacity in one area to be used to cover shortfalls elsewhere.	As explained in the SoN **[APP-556]**, this policy acknowledges that large-scale electricity generation facilities are needed and are complementary to decentralised and community energy systems. The Scheme would connect directly to the NETS; to enable the transfer of the electricity it generates over a wide geographical area, as per this policy. As per Paragraph 3.2.6, the Scheme should be considered on the basis that its need is established, and this established and urgent need should be given substantial weight in the decision.
Paragraph 3.3.20	Wind and solar and the lowest cost ways of generating electricity, helping reduce costs and providing a clean and secure source of electricity supply (as they are not reliant on fuel for generation). Our analysis shows that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar.	As explained in the SoN **[APP-556]**, the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable and low carbon electricity generation system, which is sufficient to meet future demand.

Table 1: National Policy Statement EN-1 (November 2023)		
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		This policy sets out that the government expects solar technology to play a major role in delivery of these objectives. The Scheme is in direct accordance with this expectation.
Paragraph 3.3.25	Storage has a key role to play in achieving net zero and providing flexibility to the energy system, so that high volumes of low carbon power, heat and transport can be integrated.	This Paragraph explains the need for energy storage systems to complement generation. In accordance with this need, the Scheme includes a Battery Energy Storage System (BESS) to control the release of energy to the NETS, enabling it to be released when it is most needed.
Paragraph 3.3.26 Paragraph 3.3.27	Storage is needed to reduce the costs of the electricity system and increase reliability by storing surplus electricity in times of low demand to provide electricity when demand is higher. There is currently around 4GW of electricity storage operational in GB, around 3GW of which is pumped hydro storage and around 1GQ is battery storage. Storage can provide various services, locally and at the national level. These include maximising the usable output from intermittent low carbon generation (e.g. solar and wind), reducing the total amount of generation capacity needed on the system; providing a range of balancing services to the NETSO and Distribution Network Operators (DNOs) to help operate the system; and reducing constraints on the networks, helping to defer or avoid the need for costly network upgrades as demand increases.	This Paragraph explains the need for energy storage systems to complement generation. In accordance with this need, the Scheme includes a Battery Energy Storage System (BESS) to control the release of energy to the NETS, enabling it to be released when it is most needed.
Paragraph 3.3.58	Given the urgent need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation,	As explained in the SoN **[APP-556]**, the Scheme is a substantial infrastructure asset,

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	there is an urgent need for new (and particularly low carbon) electricity NSIPS to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy.	capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change. As per Paragraph 3.2.6, the Scheme should be considered on the basis that its need is established, and this established and urgent need should be given substantial weight in the decision.
Paragraph 3.3.59	All the generating technologies mentioned above are urgently needed to meet the government's energy objectives by: • Providing security of supply (by reducing reliance on imported oil and gas, avoiding concentration risk and not relying on one fuel or generation type). • Providing an affordable, reliable system (through the deployment of technologies with complementary characteristics). • Ensuring the system is net zero consistent (by remaining in line with our carbon budgets and maintaining the options required to deliver for a wide range of demand, decarbonisation and technology scenarios, including where there are difficulties with delivery any technology.	As explained in the SoN **[APP-556]**, the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change. As per Paragraph 3.2.6, the Scheme should be considered on the basis that its need is established, and this established and urgent need should be given substantial weight in the decision.

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Paragraph 3.3.60 Paragraph 3.3.61	Known generation technologies that are included within the scope of this NPS (and would be classed as an NSIP if above the relevant capacity thresholds set out under the Planning Act 2008) include: • Offshore Wind (including floating wind). • Solar PV. • Wave. • Tidal Range. • Tidal Stream. • Pumped Hydro. • Energy from Waste (including ACTs) with or without CCS. • Biomass with our without CCS. • Natural Gas with or without CCS. • Low carbon hydrogen. • Large scale nuclear, Small Modular Reactors, Advanced Modular Reactors and fusion power plants. • Geothermal. The need for all these types of infrastructure is established by this NPS and a combination of many or all of them is urgently required for both energy security and Net Zero, as set out above.	This confirms that solar PV generation facilities, such as the Scheme, are covered by the adopted suite of Energy NPSs. As explained in the SoN **[APP-556]**, the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change. As per Paragraph 2.3.6, the Scheme should be considered on the basis that its need is established, and this established and urgent need should be given substantial weight in the decision.
Paragraph 3.3.83	Given the urgent need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation,	As explained in the SoN **[APP-556]**, solar generation is a proven technology that can be

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	there is an urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonise its economy.	delivered quickly in comparison to other forms of generation technology. The Scheme, therefore, has great potential to deliver a substantial amount of low-carbon electricity in a short timescale from construction to operation. This Paragraph further emphasises the substantial benefits of the Scheme in making a substantial contribution to meeting the UK's urgent energy needs.
Paragraph 4.1.5	In considering any proposed development, in particular when weighing its adverse impacts against its benefits, the Secretary of State should take into account: • Its potential benefits including its contribution to meeting the need for energy infrastructure, job creation, reduction of geographical disparities, environmental enhancements, and any long term or wider benefits; • Its potential adverse impacts, including on the environment, and including any long term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy.	As considered within Section 6 of the Planning Statement **[EX4/GH7.15_B]**, the benefits and adverse effects have been assessed and duly weighted. Where adverse effects have emerged through the ES **[APP-037 to APP-544]** mitigation measures, both embedded and additional, have been incorporated into the Scheme and its design.
Paragraph 4.3.1	All proposals for projects that are subject to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) must be accompanied by an Environmental Statement (ES) describing the aspects of the environment likely to be significantly affected by the project.	The DCO Application encompasses an ES **[APP-037 to APP-544]**, which constitutes a total of 27 Chapters, which asses likely significant effects, direct and indirect effects, secondary, cumulative, transboundary, short,

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Paragraph 4.3.2 Paragraph 4.3.3	The Regulations specifically refer to effects on population, human health. Biodiversity, land, soil, water, air, climate, the landscape, material assets and cultural heritage, and the interaction between them. The Regulations require an assessment of the likely significant effects of the proposed project on the environment, covering the direct effects and any indirect, secondary, cumulative, transboundary, short, medium, and long term, permanent and temporary, positive and negative effects at all stages of the project, and also the measures envisaged for avoiding or mitigating significant adverse effects.	medium, long-term, permanent and temporary, positive and negative effects at all stages of the project and also proposes mitigation measures where necessary to avoid significant adverse effects.
Paragraph 4.3.5 Paragraph 4.3.7	For the purposes of this NPS and the technology specific NPSs, the ES should cover the environmental, social and economic effects arising from pre-construction, construction, operation and decommissioning of the project. In the absence of any additional information on additional assessments, the principles set out in this Section will apply to all assessments.	The ES **[APP-037 to APP-544]** has been produced in accordance with these Paragraphs.
Paragraph 4.3.11	In some instances, it may not be possible at the time of the application for development consent for all aspects of the proposal to have been settled in precise detail. Where this is the case, the applicant should explain in its application which elements of the proposal have yet to be finalised, and the reasons as to why this is the case.	Where it has not been possible, the DCO has produced draft and outline documents, such as the Outline Decommissioning Statement (ODS) **[REP1-135]** and the Outline Construction Environmental Management Plan (OCEMP) **[REP1-131]**. Where these documents have been produced in a draft form, documents point towards the production of succeeding detailed statements and management plans.

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Paragraph 4.3.12	Where some details are still to be finalised, the ES should, to the best of the applicant's knowledge, assess the likely worst case environmental, social and economic effects of the proposed development to ensure that the impacts of the project as it may be constructed have been properly assessed.	Where details are yet to be finalised (such as the location of ancillary equipment) a worst-case analysis has been conducted to reflect the maximum design parameters across the Site(s).
Paragraph 4.3.22 Paragraph 4.3.23 Paragraph 4.3.24	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. • Only alternatives that can meet the objectives of the proposed development need be considered. The Secretary of State should be guided in considering alternative proposals by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security, climate change, and other environmental benefits) in the same timescale as the proposed development. The Secretary of State should not refuse an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site, and it should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals.	Section 6.3 of the Planning Statement **[EX4/GH7.15_B]** sets out the consideration of the Scheme in the context of relevant policy that is applicable to alternatives. This sets out how the Scheme accords with policies and legislation where consideration of alternatives may be relevant. In doing so, it notes the requirements of this policy, including that consideration of alternatives should be proportionate, take account of an alternative's ability to deliver the same infrastructure capacity as the Scheme, and that Development Consent should not be rejected on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site. Consideration of Alternatives and Design evolution is also addressed within ES Chapter 5 **[APP-042]** and the Site Selection Report **[REP1-037]** in accordance with the requirements set out in these paragraphs of EN-1.

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Paragraph 4.3.25	Alternatives not among the main alternatives studied by the applicant (as reflected in the ES) should only be considered to the extent that the Secretary of State thinks they are both important and relevant to the decision.	
Paragraph 4.3.26	As the Secretary of State must assess an application in accordance with the relevant NPS (subject to the exceptions set out in the Planning Act 2008), if the Secretary of State concludes that a decision to grant consent to a hypothetical alternative proposal would not be in accordance with the policies set out in the relevant NPS, the existence of that alternative is unlikely to be important and relevant to the Secretary of State's decision.	
Paragraph 4.3.27	Alternative proposals which mean the necessary development could not proceed, for example, because the alternative proposals are not commercially viable or alternative proposals for sites would not be physically suitable, can be excluded on the grounds that they are not important and relevant to the Secretary of State's decision.	
Paragraph 4.3.28	Alternative proposals which are vague or immature can be excluded on the grounds that they are not important and relevant to the Secretary of State's decision.	
Paragraph 4.3.29	It is intended that potential alternatives to a proposed development should, wherever possible, be identified before an application is made to the Secretary of State (so as to 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 their alternative to provide	

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	the evidence for its suitability as such and the Secretary of State should not necessarily expect the applicant to have assessed it.	
Paragraph 4.4.7 Paragraph 4.4.8	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 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. However, not all potential sources of health impacts will be mitigated in this way and the Secretary of State may want to take account of health concerns when setting requirements relating to a range of impacts, such as noise.	The cumulative effects of the Scheme have been assessed across numerous ES Chapters but primarily set out and summarised in ES Chapter 18: Human Health **[APP-055]**. Chapter 18 has assessed the cumulative residual effects on human health from the Scheme across the construction, operational and decommissioning phases. Table 18.13 in ES Chapter 18: Human Health **[APP-055]**. sets out the main receptors and likely impacts, the mitigation measures and the residual and cumulative effects across each phase. A summary of cumulative effects is also listed within ES Chapter 25: Cumulative Effects **[APP-062]** of the ES. Other ES Chapters that consider the impacts on human health include: • Chapter 7: Climate Change **[APP-044]** • Chapter 8: Landscape and Visual Impact Assessment **[APP-045]** • Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]**

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		• Chapter 13: Transport and Access **[REP2-003]** • Chapter 14: Noise and Vibration **[APP-051]** • Chapter 16: Air Quality **[APP-053]** • Chapter 17: Socio-Economics, Tourism and Recreation **[APP-054]** • Chapter 21: Electromagnetic Fields **[APP-058]** • Chapter 22: Ground Conditions and Contamination **[REP1-025]** • Chapter 23.Major Accidents and Disasters **[APP-060]** In terms of the construction phase, the cumulative requirement for primary health services during the cumulative construction phase is anticipated to experience a substantial uplift as a result of inbound temporary construction workers. However, due to the geographic spread of identified cumulative developments, the concentration of additional healthcare service need within the 5 km ZOI of the Scheme for primary healthcare provision is not anticipated to be of a greater level of

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		significance (a medium-term **minor adverse effect**) than the Scheme as assessed in isolation. This is therefore not a significant effect. ES Chapter 18: Human Health **[APP-055]** confirms that the Scheme includes embedded mitigation measures to reduce its impact. It also includes additional mitigation measures, particularly during the construction phase to reduce the impact on Oakfield Easton Maudit (offsetting from the facility within 100m) and primary healthcare services within the local area (directing workers to find and register GPs in a reasonable proximity to their accommodation, where these surgeries have reasonable capacity to take on additional patients. In terms of the cumulative effects from the operational phase of the Scheme, it is anticipated to have some level of beneficial impact on wider societal infrastructure through the provision of new play spaces, utilities, retail, and healthcare infrastructure associated with large-scale residential developments. Although these pieces of infrastructure are much more likely to benefit residents in these new-build areas rather than in existing communities, the overall impact in the 2 km ZOI for human health

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		is anticipated to be positive even if no more than low in magnitude. This is therefore likely to induce a cumulative long-term **minor beneficial effect**, which is the same significance as for the Scheme assessed in isolation. In terms of the cumulative effects from the decommissioning phase of the Scheme, it is anticipated to bring some level of employment and income uplift to the future working population, with the identified cumulative developments (where in employment uses) anticipated to maintain a steady number of jobs and economic performance. That notwithstanding, the level of cumulative effect on human health during the decommissioning period is not anticipated to be substantial greater than assessed for the Scheme in isolation, largely due to the level of uncertainty in future working and employment market conditions. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 4.6.1	Environmental net gain is an approach to development that aims to leave the natural environment in a measurably better state than beforehand. Projects should therefore not only avoid, mitigate and compensate harms,	A Biodiversity Net Gain (BNG) Assessment, using Defra's Metric 4.0 has been provided within the DCO application **[REP1-043]**. This

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	following mitigation hierarchy, but also consider whether there are opportunities for enhancements.	sets out the significant net gains in biodiversity that the Scheme will provide.
Paragraph 4.6.2	Biodiversity net gain is an essential component of environmental net gain. Projects should consider and seek to incorporate improvements in natural capital, ecosystem services and the benefits they deliver when planning how to deliver biodiversity net gain.	The Scheme has taken advantage of opportunities to conserve and enhance biodiversity and accords with this policy. The Scheme has therefore incorporated improvements in biodiversity and accords with this policy. See also Section 6.7 of the Planning Statement **[EX4/GH7.15_B]** for further detail on the biodiversity measures incorporated and compliance with planning policy.
Paragraph 4.6.6	Energy NSIP Proposals, whether onshore or offshore should seek opportunities to contribute to and enhance the natural environment by providing net gains for biodiversity, or the wider environment where possible.	A Biodiversity Net Gain (BNG) Assessment, using Defra's Metric 4.0, has been provided with the DCO application **[REP1-043]**. This sets out the significant net gains in biodiversity that the Scheme will provide. The Scheme has therefore incorporated improvements in biodiversity and accords with this policy. See also Section 6.7 of the Planning Statement **[EX4/GH7.15_B]** for further detail on the biodiversity measures incorporated and compliance with planning policy.
Paragraph 4.6.7	In England applicants for onshore elements of any development are encouraged to use the most current version of the Defra biodiversity metric to calculate their biodiversity baseline and present planned biodiversity net gain outcome. This calculation data should be present in full as part of their application.	
Paragraph 4.6.10	Biodiversity net gain should be applied in conjunction with the mitigation hierarchy and does not change or replace existing environmental obligations, although compliance with those obligations will be relevant to the question of the baseline for assessing net gain and if they deliver an	

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	additional and enhancement beyond meeting the existing obligation, that enhancement will count towards net gain.	
Paragraph 4.6.13	In addition to delivering biodiversity net gain, developments may also deliver wider environmental gains and benefits to communities relevant to the local area, and to national policy priorities, such as: • Reductions in GHG emissions; • Reduced flood risk, • Improvements to air or water quality, • Climate adaption, • Landscape enhancement, • Increased access to natural greenspace, or • The enhancement, expansion or provision of trees and woodlands.	The Scheme will deliver a substantial reduction in greenhouse gas emissions over its lifetime and a beneficial effect as explained by Chapter 7: Climate Change of the ES **[APP-044]**. The Scheme is estimated to produce low carbon energy at 0.034 to 0.037 gCO2e/kWh. The Scheme has taken other opportunities to provide enhancements, including by providing and connecting green infrastructure (as set out by the Outline Landscape Environmental Management Plan - OLEMP) **[REP1-137]**.
Paragraph 4.6.15	Applications for development consent should be accompanied by a statement demonstrating how opportunities for delivering wider environmental net gains have been considered and where appropriate, incorporated into proposals as part of good design (including any relevant operational aspects) of the project.	
Paragraph 4.6.16	Applicants should make use of available guidance and tools for measuring natural capital assets and ecosystem services, such as the Natural Capitals Committee's 'How to Do it: natural capital workbook', the government guidance on Enabling a Natural Capital Approach (ENCA), and other tools that aim to enable wider benefits for people and nature.	

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Paragraph 4.6.17	Where environmental net gain considerations have featured as part of the strategic options appraisal process to select a project, the statement should reference that information to supplement the site specific details.	
Paragraph 4.7.3 Paragraph 4.7.4	Good design is also a means by which many policy objectives in the NPS can be met, for example the impact sections show how good design, in terms of siting and the use of appropriate technologies, can help mitigate adverse impacts, such as noise. Projects should look to use modern methods of construction and sustainable design practices such as use of sustainable timber and low carbon concrete. Where possible, projects should include the reuse of material. Given the benefits of good design in mitigating the adverse impacts of a project, applicants should consider how good design can be applied to a project during the early stages of the project lifecycle.	As detailed in Section 6.3 of the Planning Statement **[EX4/GH7.15_B]**, the Scheme has been subject to a detailed and sensitive iterative design process. This has taken account of the context and features of the land within the Order limits, nearby sensitive receptors and assets, information emerging from environmental surveys, feedback from stakeholders, and opportunities and constraints in order to develop a good design that balances the need maximise the energy generation capacity of the Scheme, with the avoidance and mitigation of impacts, and provision of environmental and other enhancements, where practicable. The design process and basis of design decisions take are described in the Chapter 5: Alternatives and Design Evolution of the ES **[APP-042]** and the Design Approach Document **[APP-560]**.
Paragraph 4.7.7 Paragraph 4.7.12	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. In considering applications, the Secretary of State should take into account the ultimate purpose of the infrastructure and bear in mind the operational,	The Design Approach Document **[APP-560]** details the iterative process and how the proposed Scheme design has evolved and developed. The Site Selection Assessment **[REP1-037]** details the stages and methodology used in the

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Paragraph 4.7.13	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. 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.	assessment for determining the site selection process. The wider impacts of the Scheme have been captured, detailed, assessed, and mitigated for (where possible) through the production of the ES **[APP-037 to APP-544]**. The design process has incorporated operational, safety and security requirements as well as environmental impacts as assessed in the ES.
Paragraph 4.10.5 Paragraph 4.10.7	In certain circumstances, measures implemented to ensure a scheme can adapt to climate change may give rise to additional impacts, for example as a result of protecting against flood risk, there may be consequential impacts on coastal change. In preparing measures to support climate change adaptation applicants should take reasonable steps to maximise the use of nature-based solutions alongside other conventional techniques. In addition to avoiding further GHG emissions when compared with some 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.	Consideration has been given to incorporating nature-based climate change adaption into Scheme, and proposals for SuDS have been included, as set out in ES Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]**. As outlined within the Outline Operational Environmental Management Plan (OOEMP) **[EX4/GH7.2_B]** and the Landscape Ecological Mitigation Plans **[REP3-042, REP3-044, APP-209, REP3-046, APP-211, REP3-048, REP3-050, APP-214, APP-215, REP3-052, APP-217, REP3-054, APP-219].** The Scheme shall also provide significant biodiversity enhance and biodiversity net gain. The details of such benefits and net gain are contained in Chapter 9 Ecology and Biodiversity

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		[REP1-033]. The Chapter also assesses the cumulative effects from each phase and the embedded mitigation measures to minimise the impact of the Scheme. In general, no significant long-term adverse effects are anticipated, and the creation and enhancement of habitats such as hedgerows, grassland, and ponds are predicted to result in benefits for many species, including birds, bats, amphibians and invertebrates, among others.
Paragraph 4.10.8 Paragraph 4.10.9	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. 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.	As outlined in ES Chapter 7: Climate Change **[APP-044]**, assesses the climate change resilience of the Scheme and demonstrates relevant mitigation measures in the design of the Scheme, its construction, operation and decommissioning. This includes: • The effect of projected temperature increases on electrical equipment over the course of the Scheme's design life has been taken into account. Inverters (PV and BESS) will have a cooling system installed to control the temperature and allow the inverters to operate efficiently in warmer conditions. The PV modules and transformers have a wide range of acceptable operating temperatures, and it

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		has been determined that increasing temperatures will not adversely affect their operation. • Any health and safety plans development for construction and decommissioning activities will be required to account for potential climate change impacts on workers, such as flooding and heatwaves. • The design of drainage systems will ensure that there will be no significant increases in flood risk downstream during storms up to and including the 1 in 100 (1%) annual probability design flood, with an allowance of 20% for climate change. A Decommissioning Environmental Management Plan (DEMP) (taking account of climate change risks at the time) will be prepared prior to decommissioning. An ODS **[REP1-135]** is provided as part of the Application. ES Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]** and Flood Risk Assessments in ES Appendices 10.1 to 10.10 **[APP-098 to APP-107, REP1-053, REP1-055]** have considered the potential impacts of climate change.

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Paragraph 4.10.10 Paragraph 4.10.11	Applicants should assess the impacts on and from their proposed energy project across a range of climate change scenarios, in line with appropriate exert advice and guidance available at the time. 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.	As outlined in Chapter 7: Climate Change of the ES **[APP-044]**, account of the effects of climate change have been taken in the design of the Scheme, and its construction and decommissioning. This includes climate resilience mitigation measures: • The effect of projected temperature increases on electrical equipment over the course of the Scheme's design life has been taken into account. Inverters (PV and BESS) will have a cooling system installed to control the temperature and allow the inverters to operate efficiently in warmer conditions. The PV modules and transformers have a wider range of acceptable operating temperatures, and it has been determined that increasing temperatures will not adversely affect their operation. • Any health and safety plans developed for construction and decommissioning activities will be required to account for potential change impacts on workers, such as flooding and heatwaves. • The design of drainage systems will ensure that there will be no significant increases in

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		flood risk downstream during storms up to and including the 1 in 100 (1%) annual probability design flood, with an allowance of 20% for climate change. A Decommissioning Environmental Management Plan (DEMP) (taking account of climate change risks at the time) will be prepared prior to decommissioning. An ODS **[REP1-135]** is provided as part of the Application. • Flood Risk Assessments (FRAs) are provided at Appendices **[APP-098 to APP-107, REP1-053, REP1-055]** of the ES. The FRA provides a detailed assessment of the risk of flooding to and from the Scheme (taking account of climate change) and concludes that the risk of flooding will not be increased as a result of construction, operation or decommissioning of the Scheme. It is therefore considered that the Scheme is compliant with this policy. • Chapter 7: Climate Change of the ES **[APP-044]** presents a lifecycle greenhouse gas (GHG) impact assessment which considers the impact of GHG emissions arising over the lifetime of the Scheme on the climate. This concludes over its 60-year operational

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		lifetime the Scheme will produce 37.12TWh or 34.35TWh of electricity with an average operational greenhouse gas intensity of 0.034 to 0.037 grammes of carbon dioxide equivalent per kWh (gCO2e/kWh). This demonstrates its very low carbon attributes compared with other non-renewable forms of electricity generation, providing an overall major beneficial impact in relation to the UK meeting its carbon reduction targets and therefore represents a major beneficial effect on the climate.
Paragraph 4.11.1 Paragraph 4.11.2 Paragraph 4.11.3	The connection of a proposed electricity generation plant to the electricity network is an important consideration for applicants wanting to construct or extend generation plant. In the market system and in the past, it has been for the applicant to ensure that there will be necessary infrastructure and capacity within an existing or planned transmission or distribution network to accommodate the electricity generated. To support the achievement of the transition to net zero, government is accelerating the co-ordination of the development of the grid network to facilitate the UK's net zero energy generation development and transmission.	As captured within the Grid Connection Statement **[APP-557]**, the Applicant submitted a grid application to the National Grid Electricity System Operator Limited (NGESO), the system operator of NETS. An offer was then received for which the Applicant accepted. The Scheme is considered compliant with these Paragraphs.
Paragraph 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.	As captured within the Grid Connection Statement **[APP-557]**, the Applicant submitted a grid application to the National Grid Electricity

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Paragraph 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.	System Operator Limited (NGESO), the system operator of NETS. An offer was then received for which the Applicant accepted. The Scheme is considered compliant with these Paragraphs.
Paragraph 4.12.1	Issues relating to discharges or emissions from a proposed project, and which lead to other direct or indirect impacts on terrestrial, freshwater, marine, onshore and offshore environments, or which include noise and vibration may be subject to separate regulation under the pollution control framework or other consenting or licensing regimes, for example local planning consent or marine licences (see paragraph 4.5.6 for more information).	Construction and Decommissioning Phases (as well as BESS failure) of the Scheme pose the greatest risk of potential discharges of emissions to freshwater sources. These potential effects have been recognised against separate regulation where applicable within the Outline Construction Environmental Management Plan (OCEMP) **[REP1-131]**, ODS **[REP1-135]** and the Outline Battery Storage Safety Management Plan **[REP1-143]**.
5.2 Air Quality and Emissions Applicant Assessment Paragraph 5.2.8	Where the project is likely to have adverse effects on air quality the applicant should undertake an assessment of the impacts of the proposed project as part of the ES.	Chapter 16: Air Quality of the ES **[APP-053]** 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. Mitigation measures have been proposed where required and are summarised in Sections 16.7 and 16.9 of the Chapter.

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		This ES Chapter also 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. The implementation of mitigation measures identified within the OCEMP **[REP1-131],** the OOEMP **[EX4/GH7.2_B],** the ODS **[REP1-135],** and the Outline Construction Traffic Management Plan (OCTMP) **[REP3-064]** is assessed as preventing any significant impacts on human health from occurring. Residual effects are therefore assessed as being not significant.
Paragraph 5.2.17 Paragraph 5.2.18 Paragraph 5.2.19	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. Where a project is proposed near to a sensitive receptor site of air quality, if the applicant cannot provide justification for this location, and a suitable mitigation plan, the Secretary of State should refuse consent. In all cases, the Secretary of State must take account of any relevant statutory air quality limits, objectives and targets. If a project will leave to	ES Chapter 16: Air Quality **[APP-053]** sets out mitigation measures, which are secured in Construction, through the OCEMP **[REP1-131]**, Operation, through the OOEMP **[EX4/GH7.2_B]** and Decommissioning through the ODS **[REP1-135]** They include information on how to minimise dust emissions from the Scheme which may be impactful upon the air quality. With the embedded mitigation measures contained in the above documents and outlined in Chapter 16: Air Quality of the ES **[APP-053]**

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	noncompliance with a statutory limit, objective or target the Secretary of State should refuse consent.	demonstrate that the construction, operation and decommissioning of the Scheme will not have a significant effect on air quality. The residual effects of dust and particulate matter emissions during construction and decommissioning and the road traffic exhaust emissions during construction, operation and decommissioning on human receptors and LWSs following the implementation of additional mitigation measures are considered to be not significant. Therefore, the Scheme would not lead to non compliance with any statutory air quality limit, objective or target.
5.3 Greenhouse Gas Emission Paragraph 5.3.4	All proposals for energy infrastructure projects should include a GHG assessment as part of their ES (See Section 4.3). This should include: • A whole life GHG assessment showing construction, operational and decommissioning GHG impacts, including impacts from change of land use. • An explanation of the steps that have been taken to drive down the climate change impacts at each of those stages. • Measurement of embodied GHG impact from the construction stage. • How reduction in energy demand and consumption during operation has been priroritised in comparison with other measures.	Chapter 7: Climate Change of the ES **[APP-044]** presents a lifecycle greenhouse gas (GHG) impact assessment, which considers the impact of GHG emissions arising over the lifetime of the Scheme on the climate. ES Chapter 7: Climate Change **[APP-044]** presents a greenhouse gas (GHG) assessment over the lifetime of the Scheme. It concludes that renewable energy generation from the Scheme during the first year of operation is estimated to be around 670,000 MWh/year if tracker panels are used andaround 620,000 MWh/year if fixed panels are implemented. This

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	• How operational emissions have been reduced as much as possible through the application of best available techniques for that type of technology. • Calculation of operational energy consumption and associated carbon emissions. • Whether and how any residual GHG emissions will be (voluntarily) offset or removed using a recognised framework. • Where there are residual emissions, the level of emissions and the impact of those on national and internal efforts to limit climate change, both alone and where relevant in combination with other developments at a regional or national level, or sector level, if sectoral targets are developed.	will reduce gradually through degradation to 576,000 MWh and in the final year reduce to 533,107 MWH. The total energy generation from the proposed 60-year operational life is approximately 34.35TWh. Accounting for the estimated construction phase and operation phase emissions, the Scheme's total carbon intensity value is 43.90 – 47.44 gCO_2e/kWh (for trackers panels and fixed panels respectively). The GHG impact during construction, operation and decommissioning is assessed as having a significant beneficial effect as it will contribute to achieving the rate of transition required by nationally set policy commitments and supporting the trajectory towards net zero. The OCEMP **[REP1-131]** and the OOEMP **[EX4/GH7.2_B]** set out measures to control and drive down carbon emissions during construction and operation of the Scheme. Measures have been taken to drive down the climate change at the construction, operation and decommissioning. Embedded Mitigations include: - Any vegetation cleared for the Scheme will be compensated by a planting scheme that

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		equals or exceeds the current levels of vegetation; and - Lean design to minimise use of concrete, steel, aggregates, etc.
5.4 Biodiversity and Geological Conservation Paragraph 5.4.4 Paragraph 5.4.5	The highest level of biodiversity protection is afforded to sites identified through international conventions. The Habitats Regulations set out sites for which an HRA will assess the implications of a plan or project, including Special Areas of Conservation and Special Protection Areas. As a matter of policy, the following should be given the same protection as sites covered by the Habitats Regulations and an HRA will also be required: (a) Potential Special Projection Areas and possible Special Areas of Conservations; (b) Listed or proposed Ramsar sites; and Sites identified, or required, as compensatory measures for adverse effects on any of the other sites covered by this paragraph.	A Habitat Regulations Assessment **[REP1-153]** has been prepared, which confirms that the Scheme impact on any Special Areas of Conservation and Special Protection Areas.
Paragraph 5.4.8	Development on land within or outside a SSSI, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits (including need) of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of SSSIs.	The assessment in Section 9.9 of Chapter 9: Ecology and Biodiversity of the ES **[REP1-033]** considers the impacts of the Scheme on designated sites and concludes that there are no significant effects as a result of operation of the Scheme on any SSSIs. The Scheme therefore accords with this policy.

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Paragraph 5.4.12 Paragraph 5.4.13	Sites of regional and local biodiversity and geological interest, which include Regionally Important Geological Sites, Local Nature Reserves and Local Wildlife Sites, are areas of substantive nature conservation value and make an important contribution to ecological networks and nature's recovery. They can also provide wider benefits including public access (where agreed), climate mitigation and helping to tackle air pollution. National planning policy expects plans to identify and map Local Wildlife sites, and to include policies that not only secure their protection from harm or loss but also help to enhance them and their connection to wider ecological networks.	The assessment in Section 9.9 of Chapter 9: Ecology and Biodiversity of the ES **[REP1-033]** considers the likely significant impacts of the Scheme on designated sites and concludes that there are no significant effects as a result of the operation of the Scheme on any sites of regional and local biodiversity and geological interest. The Scheme, therefore, accords with this policy.
Paragraph 5.4.17 Paragraph 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), on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats. The applicant should provide environmental information proportionate to the infrastructure where EIA is not required to help the Secretary of State consider thoroughly the potential effects of a proposed project.	The ES has considered the effects on designated sites of ecological and geological conservation importance. This is captured within ES Chapter 9: Ecology and Biodiversity **[REP1-033]** and ES Chapter 22: Ground Conditions and Contamination **[REP1-025]**. Following the application of mitigation measures set out in Sections 9.8 of Chapter 9: Ecology and Biodiversity **[REP1-033]**, no significant adverse effects have been identified during the construction, operation or decommissioning of the Scheme and no residual effects are anticipated. Any mitigation measures undertaken at the point of decommissioning aimed at maintaining ecological value of the Sites should take account of changes in

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		ecological objectives that have occurred over the operational phase. The majority of in-combination effects likely to arise from the Scheme are considered to be beneficial. Key measures which are likely to result in beneficial in-combination effects on a number of ecological receptors include the following: • The cessation of intensive arable land-use and herbicide/fertiliser inputs associated with an arable system; • The reversion of arable land to permanent, species-rich grassland; • The retention, creation and enhancement of other ecologically valuable habitats across large parts of the Order Limits; and • Sensitive ongoing management of these habitats throughout the operational phase, as prescribed and secured by the OLEMP **[REP1-137]**.
Paragraph 5.4.19	The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests.	The Design Approach Document **[APP-560]** sets out the Design evolution and approach of the Scheme and how the extent of the Order Limits and the area proposed for the

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Paragraph 5.4.20 Paragraph 5.4.21	Applicants should consider wider ecosystem services and benefits on natural capital when designing enhancement measures. 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.	development has evolved and reduced over time to reduce impacts on biodiversity. It explains how opportunities to protect and enhance biodiversity have been incorporated into the Scheme. The Scheme has, therefore, taken advantage of opportunities to conserve and enhance biodiversity. Through incorporating improvements in biodiversity, the Scheme accords with this Policy. See also Section 6.7 of the Planning Statement **[EX4/GH7.15_B]** for further detail on the biodiversity measures incorporated and compliance with planning policy. Chapter 4: Alternatives and Design Evolution **[REP1-031]** and Chapter 9: Biodiversity of the ES **[REP1-033]** explains that the Scheme has been designed to avoid all sites statutorily designated for their biodiversity importance and to avoid or minimise impacts on sites that are non-statutorily designated for their biodiversity importance. Measures embedded within the Scheme design will ensure that designated sites are not significantly adversely impacted during construction, operation or decommissioning, and are secured within the OCEMP **[REP1-**

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		131], the OOEMP **[EX4/GH7.2_B],** the ODS **[REP1-135],** and the OCTMP **[REP3-064]** As set out in (OLEMP) **[REP1-137]**, the Scheme would provide extensive new tree and hedgerow planting and improvement of existing hedgerows by bolstering with a diversity of appropriate native species and 'gapping-up' where required. These will provide a valuable habitat, forming important wildlife corridors and reinforcing existing ones. The OLEMP **[REP1-137]** ensures the provision of barn owl nest boxes and a variety of other bird boxes and bat boxes to be installed on trees in key locations to improve nesting and roosting opportunities. The OLEMP **[REP1-137]** contains details of all ecological mitigation and enhancements A Biodiversity Net Gain (BNG) Assessment, using Defra's Metric 4.0, has been provided with the DCO application **[REP1-043]**. This sets out the significant net gains in biodiversity that the Scheme will provide. The Scheme has, therefore, taken advantage of opportunities to conserve and enhance biodiversity and accords with this policy.

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Paragraph 5.4.32	Applicants should include measures to mitigate fully the direct and indirect effects of development on ancient woodland, ancient and veteran trees or other irreplaceable habitats during both construction and operational phase.	The Scheme does not incorporate or propose the loss of any Ancient Woodlands or Veteran Trees as detailed in ES Chapter 19: Arboriculture **[APP-056].** ES Chapter 19: Arboriculture **[APP-056]** does note that during construction, crown lifting and root pruning may be required to facilitate the construction of an access track within Three Shires Wood at Green Hill G (Ancient Woodland) buffer zone. However, impacts are only anticipated if a) the base of the existing informal track in this location requires removal to install a new subbase, which may cause root damage to edge trees at Three Shires Wood and b) if the canopies of edge trees require pruning to provide clearance for construction traffic. However, mitigation measures, such as re-using existing track subbases wherever possible, hand digging and root pruning under supervision means that the significance of effect is minor and only responds to the woodland edge trees. ES Chapter 19: Arboriculture **[APP-056]** does note that during construction, crown lifting and root pruning may be required to facilitate the construction of an access track within Horn Wood at Green Hill F (Ancient Woodland) buffer

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		zone. However, impacts are only anticipated if a) the base of the existing informal track in this location requires removal to install a new subbase, which may cause root damage to edge trees at Three Shires Wood and b) if the canopies of edge trees requir3 pruning to provide clearance for construction traffic. However, mitigation measures, such as re-using existing track subbases wherever possible, hand digging and root pruning under supervision means that the significance of effect is minor and only responds to the woodland edge trees.
Paragraph 5.4.35	Applicants should include appropriate avoidance, mitigation, compensation and enhancement measures as an integral part of the proposed development. In particular, the applicant should demonstrate that: • During construction, they will seek to ensure that activities will be confined to the minimum areas required for the works. • The timing of construction has been planned to avoid or limit disturbance. • During construction and operation best practice will be followed to ensure that the risk of disturbance or damage to species or habitats is minimised, including as a consequence of transport access arrangements.	Embedded design mitigation measures of the kind set out in this policy are outlined in Section 9.8 of Chapter 9: Ecology and Biodiversity of the ES **[REP1-033]** and are illustrated within the OLEMP **[REP1-137]** and OCEMP **[REP1-131].** These include habitat avoidance, creation, and replacement measures; mitigation relating to protected and notable species; and standard mitigation measures that comply with industry good practice and environmental legislation. Production of a final CEMP and LEMP will be secured. The OCEMP **[REP1-131]** includes best practice measures to ensure that activities will be

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	• Habitats will, where practicable, be restored after construction works have finished. • Opportunities will be taken to enhance existing habitats rather than replace them, and where practicable, create new habitats of value within the site landscaping proposals. Where habitat creation is required as mitigation, compensation, or enhancement the location and quality will be of key importance. In this regard habitat creation should be focused on areas where the most ecological and ecosystems benefits can be realised. Mitigations required as a result of legal protection of habitats or species will be complied with.	confined to the minimum areas required for the works during construction, in accordance with this part of the policy. Section 9.8 of Chapter 9: Ecology and Biodiversity of the ES **[REP1-033]** outlines mitigation measures pertaining to habitat avoidance, creation and replacement measures that comply with this part of the policy.
Paragraph 5.4.36	Applicants should produce and implement a Biodiversity Management Strategy as part of their development proposals. This could include provision for biodiversity awareness training to employees and contractors so as to avoid unnecessary adverse impacts on biodiversity during the construction and operation stages.	The management of Biodiversity throughout the life of the Scheme is covered by the OLEMP **[REP1-137]**, OCEMP **[REP1-131]**, OOEMP **[EX4/GH7.2_B]** and ODS **[REP1-135]**. The OCEMP **[REP1-131]** sets out that an Environmental Clerk of Works (ECoW) will provide advice about environmental and ecological issues during construction including, for example, management of protected species, surface water management, pollution, air quality and noise. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.4.39	The government's 25 Year Environment Plan and the Environment Act 2021 mark a step change in ambition for wildlife and the natural	Chapter 9: Ecology and Biodiversity of the ES **[REP1-033]** has been produced with regard to

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Paragraph 5.4.41	environment. The Secretary of State should have regard to the aims and goals of the government's Environmental Improvement Plan 2023, and in Wales the objectives of the Nature Recovery Plan, and any relevant measures and targets, including statutory targets set under the Environment Act elsewhere. The benefits of national 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 aims and goals of the 25 Year Environment Plan, as evidenced by the extensive habitat to be provided pursuant to the OLEMP **[REP1-137].** It is therefore considered that the Scheme is compliant with this Policy. The Scheme has the potential to deliver significant amounts of low-carbon electricity and make a material contribution to help meet the UK's commitments to decrease carbon emissions and reach net zero by 2050, which in turn is beneficial for biodiversity and geological conservation interests. The Scheme has the potential to deliver biodiversity benefits as a result of its embedded mitigation and enhancement measures. As a result, there are no significant adverse impacts will occur on biodiversity features. A Biodiversity Net Gain (BNG) Assessment, using Defra's Metric 4.0, has been provided with the DCO application **[REP1-043]**. This sets out the significant net gains in biodiversity that the Scheme will provide.
Paragraph 5.4.42	As a general principle, and subject to the specific policies below, development should, in line with the mitigation hierarchy, aim to avoid significant harm to biodiversity and geological conservation interests,	As outlined in Section 9.9 of Chapter 9: Ecology and Biodiversity of the ES **[REP1-033]**, the residual effects post mitigation during operation

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Paragraph 5.4.43	including through consideration of reasonable alternatives (as set out in Section 4.3 above). Where significant harm cannot be avoided, impacts should be mitigated as a last resort, appropriate compensation measures should be sought. 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.	results in no significant harm to the key biodiversity interests at all levels within or within close proximity to the Order Limits. The impacts will be mitigated through the provision and management of appropriate habitat to be secured through the LEMP. Embedded design mitigation measures are outlined in Section 9.8 of Chapter 9: Ecology and Biodiversity of the ES **[REP1-033]** and are illustrated within the OLEMP **[REP1-137]**, OCEMP **[REP1-131]**, **O**OEMP **[EX4/GH7.2_B]** and ODS **[REP1-135]**. These include habitat avoidance, creation and replacement measures, mitigation relating to protected and notable species; and standard mitigation measures that comply with industry good practice and environmental legislation. It is therefore considered that the Scheme is compliant with this Policy.
Paragraph 5.4.44	The Secretary of State should consider what appropriate requirements should be attached to any consent and/or in any planning obligations entered into, in order to ensure that any mitigation or biodiversity net gain measures, if offered, are delivered and maintained. Any habitat creation or enhancement delivered including linkages with existing habitats for compensation or biodiversity net gain should generally be maintained for a minimum of 30 years, or for the lifetime of the project, if longer.	The Outline Landscape Ecological Management Plan (OLEMP) **[REP1-137]** outlines proposed habitat creation at the site and the Biodiversity Design Strategy. The Scheme is covered by the OCEMP **[REP1-131]**, OOEMP **[EX4/GH7.2_B]** and ODS

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		[REP1-135]. Production of a final CEMP, OEMP and DEMP will be secured. Habitat created by the Scheme would be managed and maintained through the operational life of the Scheme, which is expected to exceed 30 years. It is therefore considered that the Scheme is compliant with this policy.
5.7 - Dust, odour, artificial light, smoke, steam and insect infestation Paragraph 5.7.1	During the construction, operation and decommissioning of energy infrastructure there is potential for the release of a range of emissions such as odour, dust, steam, smoke, artificial light and infestation of insects. All have the potential to have a detrimental impact on amenity or cause a common law nuisance or statutory nuisance under Part III, Environmental Projection Act 1990. However, they are not regulated by the environmental permitted regime, so mitigation of these impacts will need to be included in the Development Consent Order.	Emissions resulting in potential statutory nuisances have been captured and assessed with the Statutory Nuisance Statement **[APP-558]**. Mitigation measures to limit the rise of statutory nuisances have been detailed within the OCEMP **[REP1-131]**, OOEMP **[EX4/GH7.2_B]** and ODS **[REP1-135]**. The Outline Battery Safety Management Plan **[REP1-143]** sets out the safety measures proposed to be installed to reduce fire risk as well as fire protection measures.
Paragraph 5.7.5	The applicant should assess the potential for insect infestation and emissions of odour, dust, steam, smoke and artificial light to have a detrimental impact on amenity, as part of the ES.	The Scheme is not anticipated to cause any effects from insect infestation, steam, smell or other effluvia. Construction and decommissioning activities will be undertaken using best practice measures to minimise air

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		emissions, as set out in the Statutory Nuisance Statement **[APP-558].** Mitigation measures to limit dust and nuisance have been detailed within the OCEMP **[REP1-131]**, OOEMP **[EX4/GH7.2_B]** and ODS **[REP1-135]**. An assessment of air quality impacts and effects as a result of the Scheme has been undertaken is presented in Section 16.8 of ES Chapter 16 Air Quality **[APP-053]**. Mitigation measures have been proposed where required and are summarised in Section 16.7 and 16.9 of this chapter. Lighting will be controlled during the construction and operational phases and details of how this will be done are contained within the OCEMP **[REP1-131]**, OOEMP **[EX4/GH7.2_B]**.
Paragraph 5.7.7	The applicant is advised to consult the relevant local planning authority and, where appropriate, the EA about the scope and methodology of the assessment.	As detailed in ES Chapter 16: Air Quality **[APP-053]** and ES Chapter 14 Noise and Vibration **[APP-051]** and in the Consultation Report **[REP1-017]**, the Applicant has been in consultation with the North Northampton Council, West Northampton Council and Milton Keynes City Council to scope and agree the methodology for the assessments.

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Paragraph 5.7.8	Mitigation measures may include one or more of the following: - engineering: prevention of a specific emission at the point of generation; control, containment and abatement of emissions if generated; - lay-out: adequate distance between source and sensitive receptors; reduced transport or handling of material; - administrative: limiting operating times; restricting activities allowed on the site; implementing management plans.	Chapter 16 Air Quality of the ES **[APP-053]** considers the likely significant effects of the Proposed Development on air quality and sets out measures for mitigation specific for each phase of the Proposed Development. 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, continued communication with the community and relevant stakeholders, site management and site monitoring/inspections. Mitigation measures are documented within and will be secured by the OCEMP **[REP1-131]**, OOEMP **[EX4/GH7.2_B]** and ODS **[REP1-135].** Chapter 15 of the ES Glint and Glare **[APP-052]** and has undertaken an assessment of potential impacts of glint and glare on surrounding road users, railway operations, dwellings, PRoW, bridleways and aviation activity. The assessment concludes that no impact is predicted from glint and glare; therefore, other than vegetation planting, no meaningful mitigation measures are proposed.

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Paragraph 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.	All above ground infrastructure will be carefully removed in accordance with the procedures and controls to be set out in the DEMP and DTMP. The outline mitigation measures are documented within the OCEMP **[REP1-131]**, OOEMP **[EX4/GH7.2_B]** and ODS **[REP1-135].** The underground cables may be left in situ, depending on which method is likely to have the least environmental impact at the time. Currently, the most environmentally acceptable option is leaving the cables and any ducts in situ, as this avoids disturbance to overlying land and habitats and to neighbouring communities.
Paragraph 5.8.13	A site specific flood risk assessment should be provided for all energy projects in Flood Zones 2 and 3 in England or Zones B or C in Wales. In Flood Zone 1 in England or Zone A in Wales, an assessment should accompany all proposals involving: • Sites of 1 hectare or more. • Land which has been identified by the EA or NRW as having critical drainage problems. • Land identified (for example in a local authority strategic flood risk assessment) as being at increased flood risk in future. • Land that may be subject to other sources of flooding (for example surface water).	Flood Risk Assessments (FRA) are provided at ES Appendices 10.1 to 10.10 **[APP-098 to APP-107, REP1-053, REP1-055]**. The FRA provides a detailed assessment of the risk of flooding to and from the Scheme (taking account of climate change) and concludes that the risk of flooding will not be increased as a result of the construction, operation or decommissioning of the Scheme. It is therefore considered that the Scheme is compliant with this policy.

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Paragraph 5.8.14	• Where the EA or NRW, Lead Local Flood Authority, Internal Drainage Board or other body have indicated that there may be drainage problems. 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.	
Paragraph 5.8.15	The minimum requirements for Flood Risk Assessments (FRA) are that they should: • Be proportionate to the risk and appropriate to the scale, nature and location of the project. • Consider the risk of flooding arising from the project in addition to the risk of flooding to the project. • Take the impacts of climate change into account, across a range of climate scenarios, clearly stating the development lifetime over which the assessment has been made. • Be undertaken by competent people, as early as possible in the process of preparing the proposal. • Consider both the potential adverse and beneficial effects of flood risk management infrastructure, including raised defences, flow channels, flood storage areas and other artificial features, together with the consequences of their failure and exceedance. • Consider the vulnerability of those using the site, including arrangements for safe access and escape.	Flood Risk Assessments (FRA) are provided at ES Appendices 10.1 to 10.10 **[APP-098 to APP-107, REP1-053, REP1-055]**. The FRA provides a detailed assessment of the risk of flooding to and from the Scheme (taking account of climate change) and concludes that the risk of flooding will not be increased as a result of the construction, operation or decommissioning of the Scheme. This professional judgement has been made as a result of considering both the potential adverse and beneficial effects anticipated through the design of the Scheme. The FRAs have considered and addressed the criteria within this paragraph.

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	• 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: 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.	

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	iii. Set out proposals for managing and discharging surface water from the site using sustainable drainage systems and accounting for the predicted impacts of climate change. If sustainable drainage systems have been rejected, present clear evidence of why their inclusion would be inappropriate. iv. Demonstrate how the hierarchy of drainage options has been followed. v. Explain and justify why the types of SuDS and method of discharge have been selected and why they are considered appropriate. vi. Explain how sustainable drainage systems have been integrated with other aspects of the development such as open space or green infrastructure, so as to ensure an efficient use of the site. vii. Describe the multifunctional benefits the sustainable drainage system will provide. viii. Set out which opportunities to reduce the causes and impacts of flooding have been identified and included as part of the proposed sustainable drainage system. ix. Explain how run-off form 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.	

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	• Detail those measures that will be included to ensure the development will be safe and remain operational during a flooding event throughout the development's lifetime without increasing flood risk elsewhere. • Identify and secure opportunities to reduce the causes and impacts of flooding overall during the period of construction; and • Be supported by appropriate data and information, including historical information on previous events.	
Paragraph 5.8.9	If, following application of the Sequential Test, it is not possible (taking into account wider sustainable development objectives), for the project to be located in areas of lower flood risk the Exception Test can be applied as defined in https://www.gov.uk/guidance/flood-risk-and-coastal-change#table2. The test provides a method of allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available.	It has not been considered possible to locate the Scheme in areas of lower flood risk as explored within the Sequential and Exception Test provided as Appendix B of the Planning Statement **[EX4/GH7.15_B]**. As such, the Report has included an assessment of the Exception Test where it is considered the Scheme is in conformity with its requirements.
Paragraph 5.8.10	The Exception Test is only appropriate for use where the Sequential Test alone cannot deliver an acceptable site. It would only be appropriate to move onto the Exception Test when the Sequential Test has identified reasonably available, lower risk site appropriate for the proposed development where, accounting for wider sustainable development objectives, application of relevant policies would provide a clear reason for refusing development in any alternative locations identified. Examples could include alternative site(s) that are subject to national designations such as landscape, heritage and nature conservation designations, for	Following application of the Sequential Test, as set out in Appendix B of the Planning Statement **[EX4/GH7.15_B]**, it is not possible to locate the development in an area of lower flood risk. Consequently, the Exception Test was carried out. The Scheme meets the requirements of the Exception Test.

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	example Areas of Outstanding Natural Beauty (AONBs), SSSIs and World Heritage Sites (WHS) which would not usually be considered appropriate.	
Paragraph 5.8.11 Paragraph 5.8.12	Both elements of the Exception Test will have to be satisfied for development to be consented. To pass the Exception Test it should be demonstrated that: • The project provides wider sustainability benefits to the community that outweigh flood risk; and • The project will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. Development should be designed to ensure there is no increase in flood risk elsewhere, accounting for the predicted impacts of climate change throughout the lifetime of the development. There should be no net loss of floodplain storage and any deflection or constriction of flood flow routes should be safely managed within the site. Mitigation measures should make as much use as possible of natural flood management techniques.	The Exception Test, provided at Appendix B of the Planning Statement **[EX4/GH7.15_B]**, has considered these two criteria. The Scheme is considered to satisfy these two criteria and as such, complies with this paragraph. Flood Risk Assessments (FRA) are provided at ES Appendices 10.1 to 10.10 **[APP-098 to APP-107, REP1-053, REP1-055 and REP1-057**]. The FRA provides a detailed assessment of the risk of flooding to and from the Scheme (taking account of climate change) and concludes that the risk of flooding will not be increased as a result of the construction, operation or decommissioning of the Scheme. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.8.22 Paragraph 5.8.23	The technology specific NPSs set out some exceptions to the application of the Sequential Test. However, when seeking development consent on a site allocated in a development plan through the application of a 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.	A Sequential Test and an Exception Test have been provided as Appendix B of the Planning Statement **[EX4/GH7.15_B]**. The Applicant considers that the Scheme passes the Sequential Test requirements. Given that the Scheme falls within areas of Flood Zone 3, the Scheme has been subject to the Exception Test. It has been concluded that

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	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 Scheme meets the requirements of the Exception Test and is therefore in conformity with this paragraph.
Part 5.9 - Historic Environment Paragraph 5.9.1	The construction, operation and decommissioning of energy infrastructure has the potential to result in adverse impacts on the historic environment above, at and below the surface of the ground.	The historic environment impacts of the Scheme and the impacts associated significance in relation to above, at, and below ground level during construction, operation and decommissioning has been explored within Section 12.8 of the ES, Chapter 12: Cultural Heritage **[APP-049]**. The Archaeological Mitigation WSI **[EX4/GH6.3.12.6_A]** ensures the Scheme complies with this paragraph.
Paragraph 5.9.6	Non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to Scheduled Monuments or Protected Wreck Sites should be considered subject to the same policies for considerations designated heritage assets. The absence of designation for such heritage assets does not indicate lower significance or necessarily imply that it is not of national importance.	Non designated heritage assets with archaeological interest are identified in ES Chapter 12: Cultural Heritage of the ES **[APP-049]**. Section 12.6 of Chapter 12: Cultural Heritage of the ES describes these assets and their significance. Section 12.8 of Chapter 12: Cultural Heritage of the ES **[APP-049]** considers the likely significant effects of the Scheme.
Paragraph 5.9.9	The applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA and describe these along with how the mitigation hierarchy has been applied in the ES (see Section 4.3). This should include consideration of heritage	Section 12.8 of Chapter 12: Cultural Heritage of the ES **[APP-049]** contains a clear and detailed assessment of likely impacts and effects of the Scheme on cultural heritage. It concludes that

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	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.	there will be no significant impacts to any designated or non-designated heritage assets, including Listed Buildings or Historic Landscape Character as a result of the Scheme. No additional mitigation is required during the operation and decommissioning phases for designated and non-designated assets within the wider landscape due to embedded mitigation being sufficient to mitigate against any potential impacts, this includes the two Conservation Areas and Listed buildings where moderate adverse effects have been identified. No additional mitigation is required where beneficial effects to archaeological assets have been identified during the operation phase.
Paragraph 5.9.10	As part of the ES the applicant should provide a description of the significance of the heritage assets affected by the proposed development, including any contribution made by their setting. The level of detail should be proportionate to the importance of the heritage assets and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the applicant should have consulted the relevant Historic Environment Record (or, where the development is in English or Welsh waters, Historic England or Cadw) and assessed the heritage assets themselves using expertise where necessary according to the proposed development's impact.	Chapter 12: Cultural Heritage of the ES **[APP-049]** concludes there would be no significant impacts to any designated or non-designated heritage assets as a result of the Scheme once embedded and additional mitigation measures are implemented. The significance of heritage assets within the study area (including the contribution made by setting) is set out in Appendix 12.3: Archaeological Desk-based Assessment and Stage 1 Setting Assessment **[APP-128]**.

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		Section 6 of ES Appendix 12.5 Heritage Statement **[APP-139 to APP-145]** assess the significance of the heritage assets and detail the contributions made by their settings.
Paragraph 5.9.12	The applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents. Studies will be required on those heritage assets affected by noise, vibration, light and indirect impacts, the extent and detail of these studies will be proportionate to the significance of the heritage asset affected.	Section 12.6 of Chapter 12: Cultural Heritage of the ES **[APP-049]** describes the heritage assets within the study area for the Scheme and their significance and the contribution of their setting to that significance.
Paragraph 5.9.13	The applicant is encouraged, where opportunities exist, to prepare proposals which can make a positive contribution to the historic environment, and to consider how their scheme takes account of the significance of heritage assets affected. This can include, where possible: • Enhancing, through a range of measures such a sensitive design, the significance of heritage assets or setting affected. • Considering measures that address those heritage assets which are at risk or which may become at risk, as result of the scheme. • 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.	Section 12.7 of Chapter 12: Cultural Heritage of the ES **[APP-049]** outlines the mitigation measures embedded within the Scheme design pertaining to cultural heritage. This includes the provision of stand-offs between the Scheme and heritage assets in order to help to preserve their setting during the construction, operational and decommissioning periods. Appropriate and sensitive screening has also been developed and implemented to minimise the visual intrusion of the Scheme, while avoiding, obscuring or intruding upon key views and relationships between heritage assets. The Scheme will also be decommissioned at the end of its operational life. Following decommissioning, any impacts of the setting of

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		heritage assets as a result of the solar farm will have been reversed.
Paragraph 5.9.14	Careful consideration in preparing the scheme will be required on whether the impacts on the historic environment will be direct or indirect, temporary or permanent.	The nature of the Scheme was considered by the Applicant as part of the assessment on Cultural Heritage that is provided in Chapter 12: Cultural Heritage **[APP-049]**. A key aspect of the Scheme is its reversible nature which means that landscape features, will not be impacted by the Scheme. Any such harm caused to the significance of heritage assets will be reversed following decommissioning of the Scheme.
Paragraph 5.9.15	Applicants should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.	There are no Conservation Areas or World Heritage Sites within the Order Limits of the Scheme. Chapter 12: Cultural Heritage **[APP-049]** assesses the effects of the Scheme on heritage assets. The Scheme subject to the embedded mitigation measures during the construction and operational phases shall preserve the setting of heritage assets close to the site.
Paragraph 5.9.22	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 (including assets whose setting may be affected by the proposed development), taking account of:	Please see response to 5.9.10 above.

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	• 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 parities during the examination process. • Expert advice, where appropriate, and when the need to understand the significance of the heritage asset demands it.	
Paragraph 5.9.25	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.	Section 12.8 of **Chapter 12: Cultural Heritage of the ES [APP-049]** assesses the likely impacts of the Scheme on cultural heritage, including direct and indirect, and temporary or permanent effects. There would be no significant adverse effects on designated or non-designated heritage assets. It is not envisaged that there would be any direct impacts to any elements that contribute to the historic landscape character beyond that caused during the construction phase (i.e. removal of hedgerow). Instead, landscape

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		mitigation as part of the Scheme will result in the enhancement of hedgerow and woodland shelter belts and so will provide a beneficial effect to the Historic Landscape Character.
Paragraph 5.9.27 Paragraph 5.9.28 Paragraph 5.9.29 Paragraph 5.9.30 Paragraph 5.9.31	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 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. Substantial harm to or loss of significance of a Grade II Listed Building Park or Grade II Registered Park or Garden should be exceptional. 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* Registered Parks and Gardens; and World Heritage Sites, should be wholly exceptional. 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	The Scheme is not likely to result in any significant adverse effects on cultural heritage. The design development has sensitively considered the key receptors throughout, and appropriate mitigation measures are embedded into the design. By implementing Good Design at the early stages of the process, the Scheme has avoided and minimised conflict with designated and non designated heritage assets. Through the implementation of mitigation measures, all residual effects are assessed as not significant and equate to less than substantial harm on all designated and non-designated heritage assets impacted by the Scheme as set out in Appendix 12 – Cultural Heritage Impact Assessment Tables of Chapter 12 [APP-049] of the ES. The assessment in the Heritage Statement in Appendix 12.5 of Chapter 12 Cultural Heritage **[APP-139 to APP-145]** concludes that there is potential for less than substantial harm, at the upper end of the scale to Low Farmhouse (NHLE 1371681) and Station Lodge (NHLE

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	harm to, or loss of, significance is necessary to achieve substantial public benefits that outweigh that harm or loss, or all the following apply: • The nature of the heritage asset prevents all reasonable uses of the site. • No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation. • Conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible. • The harm or loss is outweighed by the benefit of bringing the site back into use.	129415) as a result of construction traffic during the construction phase. The assessment concludes that there is less than substantial harm to 17 designated and non-designated heritage assets, including:12 Listed Buildings (one Grade I Listed, one Grade II* Listed, ten Grade II Listed); two Conservation Areas; and three non-designated heritage assets. The assessment concludes that there is less than substantial harm, at the lower end of the scale to 18 designated and non-designated heritage assets, including: six Listed buildings (Grade II Listed); and 12 non-designated heritage assets.
Paragraph 5.9.32	Where the proposed development will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate securing its optimum viable use.	The Scheme's design has been carefully considered to avoid, reduce, or mitigate potentially significant effects on cultural heritage and archaeology assets as set out in the Planning Statement. This resulted in a Scheme that avoids direct physical impact on any designated heritage assets. Whilst there will be

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		some residual impacts resulting from changes to the setting of some designated heritage assets, these have been assessed to result in 'less than substantial harm' as set out in ES Chapter 12: Cultural Heritage **[APP-049]**. Impacts upon the setting of heritage assets have been minimised by design modifications, with additional vegetation planted in the screen panels, so any residual effect is not significant and the harm to significance is considered to be less than substantial. The Scheme would cause harm to designated heritage assets by introducing changes within their setting, which will affect how the asset is experienced and understanding of the archaeological assets below ground. Further, the substantial public benefits and need for the Scheme, as set out in the Planning Statement **[EX4/GH7.15_B]**, including the delivery of Critical National Priority (CNP) infrastructure to contribute towards meeting national energy security objectives and carbon reduction commitments, clearly and demonstrably outweigh the less than significant harm to cultural heritage assets.

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Paragraph 5.9.33	In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.	Non-designated heritage assets are identified in Chapter 12: Cultural Heritage of the ES **[APP-049]**. Section 12.6 of Chapter 12: Cultural Heritage of the ES describes these assets and their significance. Chapter 12: Cultural Heritage of the ES **[APP-049]** concludes there would be no significant impacts to any designated or non-designated heritage assets as a result of the Scheme once embedded and additional mitigation measures are implemented. The SoN **[APP-556]** presents a detailed and compelling case for why the Scheme is urgently required and at the scale proposed. The scale of the Scheme inherently poses adverse effect upon some non-designated heritage assets, with a balanced judgement in mind, it is considered that this harm is demonstrably outweighed by the benefits of the Scheme.
Paragraph 5.9.35	Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the Secretary of State should not take its deteriorated stated into account in any decision.	There are no heritage assets identified in the study area where evidence was found of deliberate neglect of, or damage to, the asset.
Paragraph 5.9.36	When considering applications for development affecting the setting of a designated heritage asset, the Secretary of State should give appropriate weight to the desirability of preserving the setting such assets and treat favourably applications that preserve those elements of the setting that	Chapter 12: Cultural Heritage of the ES **[APP-049]** concludes there would be no significant impacts to any designated or non-designated heritage assets as a result of the Scheme once

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	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 significant 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 and heritage asset, the greater the benefits that will be needed to justify approval.	embedded and additional mitigation measures are implemented. Further, the proposed planting, that is designed to preserve open views, would contribute to the significance of the conservation area.
Part 5.10 - Landscape and Visual Paragraph 5.10.5	Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation.	As outlined in Chapter 8: Landscape and Visual Impact Assessment (LVIA) **[APP-045],** there is an acknowledgement that the Scheme will have moderate adverse significant effects on the local study area at construction and at Year 1. Following establishment of the embedded landscape mitigation these effects reduce to moderate/minor adverse at Year 15. Effects at decommissioning are minor adverse. As a consequence of the embedded landscape mitigation there will be a moderate beneficial significant effect on the landscape fabric at Year 15 and decommissioning.
Paragraph 5.10.6	Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.	Due consideration has been given to the effects of the Scheme upon the landscape. As detailed in Section 6.3 of the Planning Statement **[EX4/GH7.15_B]**, the Scheme has been subject to a detailed and sensitive iterative design process. This has taken account of the context and features and features of the land within the Order limits, nearby sensitive receptors and

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		assets, information emerging from environmental surveys, feedback from stakeholders, and opportunities and constraints in order to develop a good design that balances the need to maximise the energy generation capacity of the Scheme, with the avoidance and mitigation of impacts, and provision of environmental and other enhancements, where practicable. The design process and basis of design decisions taken are described in the Chapter 5: Alternatives and Design Evolution of the ES **[APP-042]** and the Design Approach Document **[APP-560]**.
Paragraph 5.10.7	National Parks, the Broads and AONBs have been confirmed by the government as having the highest status of protection in relation to landscape and natural beauty. Each of these designated areas has specific statutory purposes. Projects should be designed sensitively given the various siting, operational, and other relevant constraints. For development proposals located within designated landscapes the Secretary of State should be satisfied that measures which seek to further purposes of the designation are sufficient, appropriate and proportionate to the type and scale of the development.	As outlined in Chapter 8: LVIA **[APP-045]**, neither the DCO Site nor the Outer 5km Study Area of the Scheme is covered by any statutory landscape designations (e.g., National Parks or National Landscapes). No impacts on National Parks, the Broads and National Landscapes have been identified.
Paragraph 5.10.8	The duty to seek to further the purposes of nationally designated landscapes also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. In these locations, projects should be designed sensitively given the various siting, operational, and other relevant constraints. The Secretary of State	As stipulated by this policy, Chapter 8: LVIA **[APP-045]** shows regard for nationally designated areas. No impacts on National Parks, the Broads or National Landscapes have been identified.

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	should be satisfied that measures which seek to further the purposes of the designation are sufficient, appropriate and proportionate to the type and scale of the development.	
Paragraph 5.10.11	Development within a Heritage Coast (that is not also a National Park, The Broads or an AONB [now National Landscapes]) is unlikely to be appropriate, unless it is compatible with the natural beauty and special character of the area.	The Scheme is not situated within a Heritage Coast and therefore, this paragraph is not relevant.
Paragraph 5.10.12	Outside nationally designated areas, there are local landscapes that may be highly valued locally. Where a local development document in England or a local development plan in Wales has policies based on landscape or waterscape character assessment, these should be paid particular attention. However, locally valued landscapes should not be used in themselves to refuse consent, as this may unduly restrict acceptable development.	As detailed within ES Chapter 3 **[REP1-029]**, Site G is located in the proposed extension of the Ouse Valley Special Landscape Area, set out in Milton Keynes emerging Local Plan. However, Milton Keynes's emerging Local Plan has also put forward this area as areas of search for wind turbines and solar farms. Therefore, the Scheme is considered to be compliant with Milton Keynes's emerging Local Plan.
Paragraph 5.10.13 Paragraph 5.10.14	All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites. The Secretary of State will have to judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the project.	Chapter 8: LVIA of the ES **[APP-045]** has addressed the construction, short-term operational (at Year 1), long term operational (at Year 15) and decommissioning visual impacts of the Scheme. It is considered that the three significant adverse residual effects of the Scheme at Year 15 and two at the decommissioning phase are clearly and comprehensively outweighed by the

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		benefits of the Scheme, as set out at Section 4 of the Planning Statement **[EX4/GH7.15_B]**, in terms of delivering renewable energy infrastructure, which is urgently needed to create a secure and affordable energy system and to help combat climate change. Furthermore, there will be a significant moderate benefit on the landscape fabric on the decommissioning of the Scheme, due to the Landscape Legacy and retention of the mitigation planting. Although it is acknowledged that there will be an adverse effect on the local study area (1km) and private, transport and public receptors at Year 15 of operation and during the decommissioning phase, these benefits of the Scheme (including need) significantly outweigh these adverse effects.
Paragraph 5.10.16	The applicant should carry out a landscape and visual impact assessment and report it in the ES, including cumulative effects (see Section 4.3). Several guides have been produced to assist in addressing landscape issues.	An assessment of the potential landscape and visual impacts associated with the construction, operation and decommissioning of the Scheme has been carried out and is presented in Chapter 8: Landscape and Visual Impact **[APP-045]** of the ES.
Paragraph 5.10.17	The landscape and visual assessment should include reference to any landscape character assessment and associated studies as a means of assessing landscape impacts relevant to the proposed project. The applicant's assessment should also take account of any relevant policies	ES Chapter 8 LVIA **[APP-045]** considers the relevant landscape character assessments and related studies at national, regional, county and neighbourhood levels. As demonstrated in the

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	based on these assessments in local development documents in England and local development plans in Wales.	local policy sections of this Accordance Table below, the landscape and visual impact assessment has taken account of relevant policies in local plan development documents. Refer to Figure 8.5: Landscape Character Areas **[APP-259]** illustrate the Landscape Character Areas and the assessment is considered in ES Chapter 8: LVIA **[APP-045]**. The Scheme, therefore, demonstrates full compliance with this policy.
Paragraph 5.10.19	The applicant should consider landscape and visual matters in the early stages of siting and design, where site choices and design principles are being established. This will allow the applicant to demonstrate in the ES how negative effects have been minimised and opportunities for creating positive benefits or enhancement have been recognised and incorporated into the design, delivery and operation of the scheme.	As set out in Section 6.4 of the Planning Statement **[EX4/GH7.15_B]** and described within ES Chapter 8: Landscape and Visual Impact **[APP-045]**, the Scheme has been the subject of an iterative design process, informed by analysis of landscape and visual constraints, iterative impact assessments and mitigation proposals. The mitigation strategy and design development are based on the Landscape Design Parameters set out at Table 8.7 of ES Chapter 8 LVIA **[APP-045]**. This has helped ensure that primary landscape mitigation is co-ordinated with other relevant disciplines, such as ecology, to determine the key parameters and agree offsets to improve

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		the value of landscape and reflect appropriate local, regional and national aims and objectives for ecology and biodiversity.
Paragraph 5.10.20	The assessment should include the effects on landscape components and character during construction and operation. For projects which may affect a National Park, The Broads or an AONBs the assessment should include effects on the natural beauty and special qualities of these areas.	ES Chapter 8 LVIA **[APP-045]** includes the effects on landscape and visual receptors during construction, operation (at Year 1 and Year 15) and decommissioning. There are no National landscape designations such as National Parks or National Landscapes, contained within the Outer 5km Study Area of the Scheme.
Paragraph 5.10.21	The assessment should include the visibility and conspicuousness of the project during construction and of the presence and operation of the project and potential impacts on views and visual amenity. This should include light pollution effects, including on dark skies, local amenity, and nature conservation.	ES Chapter 8 LVIA **[APP-045]** includes the effects on landscape and visual receptors during construction, operation (at Year 1 and Year 15) and decommissioning.
Paragraph 5.10.22	The assessment should also address the landscape and visual effects of how noise and light pollution, and other emissions (see Section 5.2 and Section 5.7), from construction and operational activities on residential amenity and on sensitive locations, receptors and views, how these will be minimised.	Artificial lighting will be required during construction and decommissioning in areas where natural lighting is unable to reach (sheltered/confined areas), and during core working hours within winter months. All construction lighting will be deployed in accordance with the recommendations set out in the OCEMP **[REP1-131]** and will minimise potential for light spillage outside the Scheme

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		and Cable Corridor, particularly towards houses, traffic and ecological habitats. Details of operational lighting are set out by Chapter 4: Scheme Description of the ES **[REP1-031]**. This explains that no part of the Scheme will be continuously lit. Manually operated, and motion detection lighting will be utilised for operational and security purposes around electrical infrastructure. Lighting will be directed downward and away from boundaries. No visible lighting will be utilised at the site perimeter fence, aside from the site entrance points.
Paragraph 5.10.24	Applicants should consider how landscapes can be enhanced using landscape management plans, as this will help to enhance environmental assets where they contribute to landscape and townscape quality.	Good design has been a key consideration from the outset. The ES Chapter 8: Landscape and Visual Impact ES Chapter 8 LVIA **[APP-045]** includes the effects on landscape and visual receptors during construction, operation (at Year 1 and Year 15) and decommissioning. Landscaping has informed the iterative design process, including taking account of published landscape character assessment guidance and fieldwork analysis. The overall objective of the landscape design is to integrate the Scheme into its landscape setting and avoid or minimise adverse

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		landscape and visual effects as far as practicable. The design has been developed in collaboration with the wider design team, other specialists and the Host Authorities' landscape advisors to achieve a solution that achieves this objective whilst maximising opportunities to deliver net gain in biodiversity gain. Accordingly, the landscape design aims to achieve the following: • To integrate the Scheme into the existing landscape pattern as far as possible by retaining and following existing features, including vegetation, where practicable. • To replace vegetation loss because of construction of the Scheme through areas of new planting. • To filter and screen more prominent components of the Scheme in views from visual receptors. Details of the landscape measures embedded into the Scheme design, including a summary of their environmental functions, is presented in the OLEMP **[REP1-137]**.
Paragraph 5.11.12	Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2, and 3a of the Agricultural	The majority of the land in the Scheme is arable. The desk study and field surveys

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Paragraph 5.11.13 Paragraph 5.11.14	Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5). 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. 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.	indicate that the soils of the Sites are predominantly slowly permeable, calcareous or non-calcareous clayey soils. The ALC Grades of the Sites and Cable Route Corridor range from Grade 1 to 3b. The Best and Most Versatile (BMV) land covers 854.5 hectares, making up 65% of the Order Limits. This is justified by the Scheme helping to meet the UK's net zero 2050 ambitions as well as other benefits, such a biodiversity net gain, as explained in Section 4 of the Planning Statement **[EX4/GH7.15_B]** An Outline Soil Management Plan (OSMP) **[APP-550]** has been prepared which sets out the measures to manage any potential impacts to the soil (and agricultural land) during the construction, operational (including maintenance) and decommissioning phases, and will be secured by DCO requirement. The outline Soil Management Plan identifies those areas within the Site which may be more susceptible to damage, for example, the temporary access tracks, construction compounds and steep slopes and qualities of

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		the soil, for example when it is wet or after periods of heavy rainfall or high winds and it will advise on when soils are suitable for being handled or trafficked. The OSMP **[APP-550]** also details measures for soil management and follow the principles of best practice to maintain the physical properties of the soil, with the aim of restoring the land to its pre-construction condition following the temporary construction use and at the end of the lifetime of the Scheme.
Paragraph 5.11.15	Developments should contribute to and enhance the natural and local environment by preventing new and existing developments from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.	The effects of Scheme on the natural and local environment are considered in the Environmental Statement **[APP-037 to APP-554]**. The Scheme does not anticipate any adverse or beneficial significant effects in its own right or cumulatively with other developments on air quality, noise, water resources, land contamination or land instability.
Paragraph 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	Chapter 22: Ground Conditions and Contamination of the ES **[REP1-025]** outlines that the Site has largely remained undeveloped

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	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.	throughout its entire history, except for localised construction of minor structures, tracks, paths and access roads. Numerous gravel pits and small quarries are shown to be distributed across the Site. The applicant has carried out extensive consultation with the Local Planning Authorities including relevant statutory consultees. This is described in the Consultation Report **[REP1-017].**
Paragraph 5.11.19	Applicants should safeguard any mineral resources on the proposed site as far as possible, taking into account the long-term potential of the land use after any future decommissioning has taken place.	As detailed within ES: Chapter 11 Minerals **[APP-048]**, the Sites potentially impact a sand and gravel allocation known as M2 Strixton – Bozeat as well as two existing quarry areas and the mineral consultation areas associated with existing quarries and allocations. The Scheme also falls within the Northamptonshire Sand and Gravel Mineral Safeguarding Area. Given the unintrusive nature of the Scheme, it is proposed that no adverse harm will occur upon these Safeguarding Areas. The Scheme will be decommissioned after 60 years of operation, and any impacts caused by the Scheme related to land use are considered reversible and temporary. The minerals within the Order limits will not be permanently

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		sterilised, and post-decommissioning, the land could be worked for minerals.
Paragraph 5.11.28	Where a proposed development has an impact upon a Mineral Safeguarding Area (MSA), the Secretary of State should ensure that appropriate mitigation measures have been put in place to safeguard mineral resources.	As detailed within ES: Chapter 11 Minerals **[APP-048]**, In terms of Green Hill A, A.2 and B together with associated Cable Route Corridors, these sites all affect sand and gravel Mineral Safeguarding Areas, and the Scheme would prevent exploitation of these mineral resources for the life of the Scheme. There is no evidence to suggest there has been any significant sand and gravel extraction within or in the vicinity of these sites nor the relevant section of the Cable Route Corridor. None are allocated for future mineral extraction in the Northamptonshire Minerals and Waste Local Plan.
Paragraph 5.11.30 Paragraph 5.11.31	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 mya be to improve and 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 Secretary of State should consider whether the mitigation measures put forward by an applicant are acceptable and whether requirements or	The Scheme has sought to minimise disruption upon Public Rights of Way (PRoW) and Open Access Land. Where this has not been possible, ensuring minimal disruption, providing ample notice and ensuring continued passage has been of paramount importance. Where PRoW issues have arisen, the Outline Public Rights of Way Management Plan (OPRoWMP) **[REP1-147]** has captured appropriate mitigation measures. Section 13.9 of Chapter 13: Transport and Access of the ES **[REP2-003]** sets out the

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	other provisions in respect of these measures should be included in any grant of development consent.	mitigation measures embedded in the Scheme, including that the Scheme seeks to protect and enhance the existing PRoW network and ensure the provision of new and improved multi-user routes.
Secretary of State Decision Making Paragraph 5.11.32	The Secretary of State should not grant consent for development on existing open space, sports and recreational buildings and land unless an assessment has been undertaken either by the local authority or independently, which has shown the open space or the buildings and land to be surplus to requirements or the Secretary of State determines that the benefits of the project (including need), outweigh the potential loss of such facilities, taking into account any positive proposals made by the applicant to provide new, improved or compensatory land or facilities.	The Scheme does not propose development on existing open space, sports and recreational buildings and land.
Part 5.12 - Noise and Vibration Paragraph 5.12.5	Factors that will determine the likely noise impact of a proposed development include: • The inherent operational noise from the proposed development, and its characteristics. • The proximity of the proposed development to noise sensitive premises (including residential properties, schools and hospitals) and noise sensitive areas (including certain parks and open spaces). • The proximity of the proposed development to quiet places and other areas that are particularly valued for their soundscape or landscape quality.	Noise generation arising from the Scheme have been identified within ES Chapter 14: Noise and Vibration **[APP-051]**. Through embedded mitigation measures (detailed within Section 14.7 of ES Chapter 14: Noise and Vibration **[APP-051]**), no significant residual effects are predicted during construction, operation and decommissioning of the Scheme on all receptors. Vibration levels from activities (i.e. on-site works and construction HGV traffic) are anticipated to be below SOAEL and as such is equivalent to low magnitude of impact. This is equivalent to a

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	• The proximity of the proposed development to sites where noise may have an adverse impact on protected species or other wildlife, including migratory species. • The potential presence of unexploded ordnance on the seabed.	moderate effect which is not considered to be significant. Typical decommissioning noise levels across the overall duration of the decommissioning programme will likely be limited to a low magnitude impact. For receptors of high sensitivity this equates to a moderate adverse effect which is not considered to be significant.

Paragraph 5.12.6	Where noise impacts are likely to arise from the proposed development, the applicant should include the following in the noise assessment:
	• A description of the noise generating aspects of the development proposal leading to noise impacts, including the identification of any distinctive tonal characteristic, if the noise is impulsive, whether the noise contains particularly high or low frequency content or temporary characteristics of the noise.
	• Identification of noise sensitive receptors and noise sensitive areas that may be affected.
	• The characteristics of the existing noise environment.
	• A prediction of how the noise environment will change with the proposed development:
	  ○ In the shorter term, such as during the construction period.
	  ○ In the longer term, during the operating life of the infrastructure.
		Chapter 14: Noise and Vibration of the ES **[APP-051]** presents a noise assessment in accordance with the requirements of this policy.
		Figures 14.6 to 14.11 of Chapter 14: Noise and Vibration of the ES **[APP-051]** describes the noise sensitive receptors and areas that have been identified. These have been determined through desktop study during the scoping process and confirmed during site visits. The locations of these receptors have been considered in both the construction and operational noise assessments and are considered representative of adjacent properties.
		Section 14.6 of Chapter 14: Noise and Vibration of the ES **[APP-051]** outlines the characteristics of the existing noise environment for the Scheme and surrounding areas.

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	○ At particular times of the day, evening and night (and weekends) has 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/and well-being where appropriate, particularly among those disadvantaged by other factors who are often disproportionately affected by noise sensitive areas. • If likely to cause disturbance, an assessment of the effect of underwater or subterranean noise. • All reasonable steps taken to mitigate potential adverse effects on health and quality of life.	Section 14.7 of Chapter 14: Noise and Vibration **[APP-051]** describes the embedded design mitigation for the Scheme with respect to noise and vibration, encompassing the construction, operation and decommissioning phases. Section 14.8 of Chapter 14: Noise and Vibration of the ES **[APP-051]** assesses the noise generated by the Scheme during the construction period and operating life of the infrastructure (including tonality), including at particular times of the day and at night, on the noise sensitive premises and areas outline in Table 14.22 of Chapter 14: Noise and Vibration of the ES **[APP-051]**.
Paragraph 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 EA and/or the SNCB, and other relevant bodies, such the MMP or NRW, as necessary, and in particular regarding assessment of noise on protected species or other wildlife. The results of any noise surveys and predictions may inform the ecological assessment. The seasonality of potential affected species in nearby sites may also need to be taken into account.	The Consents and Agreement Position Statement **[REP1-149]** has been prepared as part of the DCO application (DCO Application) and should be read in conjunction with the other documents submitted with the DCO Application. The purpose of this document is to provide information on the additional consents and licences potentially required for the Scheme, in addition to the DCO. Chapter 9: Ecology and Biodiversity of the ES **[REP1-033]** assesses the likely significant effects of the Scheme on the protected species and other wildlife. The assessment takes

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		account of noise impacts and concludes that no significant effects arise. The Applicant has taken account of advice from the EA and Natural England in preparing the Environmental Statement **[APP-038 to APP-064].**
Paragraph 5.12.12	Applicants should submit a detailed impact assessment and mitigation plan as part of any development plan, including the use of noise mitigation and noise abatement technologies during construction and operation.	Chapter 14: Noise and Vibration of the ES **[APP-051]** presents a noise assessment in accordance with the requirements of this policy. Figures 14.1-14.5 **[APP-449 to APP-453]** describe the noise sensitive premises and areas that have been identified. These have been determined through desktop study during the scoping process and confirmed during site visits. The locations of these receptors have been considered in both the construction and operational noise assessments and are considered representative of adjacent properties. Section 14.6 of Chapter 14: Noise and Vibration of the ES **[APP-051]** outlines the characteristics of the existing noise environment for the Scheme and surrounding areas.

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		Section 14.7 of Chapter 14: Noise and Vibration of the ES **[APP-051]** describes the embedded design mitigation for the Scheme with respect to noise and vibration, encompassing the construction, operation and decommissioning phases. Section 14.8 of Chapter 14: Noise and Vibration of the ES **[APP-051]** assesses the noise generated by the Scheme during the construction period and operating life of the infrastructure (including tonality), including at particular times of the day and at night, on the noise sensitive premises and areas outlined in Table 14.22 of Chapter 14: Noise and Vibration of the ES **[APP-051]**.
Paragraph 5.12.14	Mitigation measures may include one or more of the following: - engineering: reducing the noise generated at source and/or containing the noise generated - lay-out: where possible, optimising the distance between the source and noise-sensitive receptors and/or incorporating good design to minimise noise transmission through the use of screening 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	Section 14.7 of Chapter 14: Noise and Vibration of the ES **[APP-051]** details the embedded mitigation measures that have been embedded into the Scheme's design and construction methodology to minimise adverse effects where practicable.

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	between different times of day, such as evenings and late at night, and taking into account seasonality of wildlife in nearby designated sites - insulation: mitigating the impact on areas likely to be affected by noise including through noise insulation when the impact is on a building.	
Paragraph 5.12.15	The project should demonstrate good design through selection of the quietest or most acceptable cost-effective plant available; containment of noise within buildings wherever possible, taking into account any other adverse impacts that such containment might cause (e.g. on landscape and visual impacts; optimisation of plant layout to minimise noise emissions; and, where possible, the use of landscaping, bunds or noise barriers to reduce noise transmission).	The Scheme has demonstrated good design through the inclusion of noise and vibration mitigation measures. Section 14.7 of Chapter 14: Noise and Vibration of the ES **[APP-051]** details the embedded mitigation measures for the operational phase. Chapter 8 Landscape and Visual Amenity of the ES **[APP-045]** sets out an assessment of how the Scheme's design, which includes embedded mitigation measures, will have an effect on landscape and visual impacts, and sets out any necessary mitigation measures.
Part 5.13 - Socio-economic Paragraph 5.13.4	The applicant's assessment should consider all relevant socio-economic impacts, which may include: • The creation of jobs and training opportunities. Applicants may wish to provide information on the sustainability of the jobs created, including where they will help to develop the skills needed for the UK's transition to Net Zero. • The contribution to the development of low-carbon industries at the local and regional level as well as nationally.	The (OSSCEP) **[APP-552]** assesses the specific requirements across the three Council areas which seek to promote greater access to training and learning opportunities so local people can gain access to higher skilled jobs. Section 7.8 sets out an employment plan to promote employment at all levels including apprenticeships and how such opportunities will be delivered and monitored.

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	• 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 phase 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). • Cumulative effects – if development consent were to be granted to for a number of projects within a region and these were developed in a similar timeframe, there could be some short-term negative effects, for example a potential shortage of construction workers to meet the needs of other industries and major projects within the region.	Chapter 17: Socio-Economics, Tourism and Recreation (SETR) **[APP-054]** of the ES includes an assessment of socio-economic impacts for the Scheme which responds to the points in the policy. The Scheme is likely to have impacts on socio-economic receptors at the local and regional level, and to a more minor extent, the national level. These effects are predominantly focused on economic impacts (particularly during construction), given the nature of the Scheme. Impacts on socio-demographic receptors are likely to be limited to those as a result of the anticipated construction workforce and the related indirect impacts on socio-demographic characteristics. The Scheme is of a nationally significant scale, and as such will provide a significant number of employment opportunities for direct and indirect sectors of the local and regional economy during construction. These will also have knock-on impacts on other socio-economic factors such as wages, unemployment, and deprivation as a result of increased access to employment. The Scheme is likely to have an impact on tourism and recreation receptors, albeit these are likely to be limited to those receptors that

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		are directly impacted affected by the location of the Scheme such as PRoWs, and landscape visual receptors and local heritage assets that rely on their setting for their value to the tourism and recreational economy. The Scheme, being located on existing agricultural land, is not anticipated to directly impact on the use and accessibility of dedicated recreational spaces and tourist attractions. The Scheme may impact on the use of PRoWs which cross the Scheme's boundaries during the project's construction, but this will be addressed in the OPRoWWMP) **[REP1-147]**
Paragraph 5.13.5	Applicants should describe the existing socio-economic conditions in the areas surrounding the proposed development and should also refer to how the development's socio-economic impacts correlate with local planning policies.	Chapter 17: SETR of the ES **[APP-054]** includes a baseline assessment of the conditions of the area.
Paragraph 5.13.6	Socio-economic impacts may be linked to other impacts, for example visual impacts considered in Section 5.10 but may also have an impact on tourism and local businesses. Applicants are encouraged, where possible, to demonstrate that local suppliers are considered in any supply chain.	Chapter 17: SETR of the ES **[APP-054]**, considers the socio-economic impact of the Scheme. It also sets out that in procurement of the contractor to complete the construction works, strong consideration will be given to their strategy for engaging the local supply chain and using local materials where possible and practical. The permanent jobs created to

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		support the Scheme are a reflection of the requirements to maintain the infrastructure. An Outline Skills, Supply Chain and Employment Plan (OSSCEP) **[APP-552]** will be prepared prior to the commencement of construction. This will set out measures that the Applicant will implement in order to: • Advertise and promote employment opportunities associated with the Scheme in construction and operation locally. • Advertise those elements of the supply chain required for the construction and operation of the authorised development and which provide opportunities for Local Companies.
Paragraph 5.13.7	Applicants should consider development accommodation strategies where appropriate, especially during construction and decommissioning phases, that would include the need to provide temporary accommodation for construction workers if required.	Chapter 17: SETR of the ES **[APP-054]** considers temporary accommodation and the requirements for the housing of construction workers. It acknowledges that there will be a short to medium term temporary minor adverse effect during construction as there will be a decreased supply of accommodation for residents due to the requirement for inbound temporary construction works, within the Study Area. Mitigation measures include investment in local

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		recruitment and procurement to increase the proportion of construction workforce within the Study Area but the effects are still considered to be short to medium term temporary minor adverse. The transport of these construction workers is considered in Chapter 13 Transport and Access **[REP1-149]** of the ES, which states that on average, it has been assumed that a shuttle bus will be able to accommodate 15 workers. As such, a spread of between 40% and 60% of construction workers across the Scheme Sites is expected to arrive by shuttle bus. This is a similar range to other DCO Solar Scheme consents. For example, Longfield Solar Farm (PINS reference EN010118) assumed that 55% of the workforce would arrive by shuttle bus and Cottam Solar Project (PINS reference EN010133) assumed 50%.
Paragraph 5.13.11 Paragraph 5.13.12	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 potions for phasing development in relation to the socio-economic impacts. 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	Section 4 of the Planning Statement **[EX4/GH7.15_B]** describes some of the other benefits of the Scheme, in addition to the energy and climate change benefits. Benefits of the Scheme to the local community (other than the generation of a substantial amount of renewable energy), are set out in Section 4.6 of

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	development opportunities, including apprenticeships, education, engagement with local schools and colleges and training programmes to be enacted.	the Planning Statement **[EX4/GH7.15_B]**. These include: • A significant biodiversity net gain in habitat units (delivered through the creation of other neutral grasslands within the sites), hedgerow units, and river units as shown within the Biodiversity Net Gain Assessment **[REP1-043]**. • Employment during the construction phase. It is expected that an average of 464 direct FTE jobs per annum will be created during the construction period. During the operational phase, a gross 15 FTE direct staff per annum would be employed on the site, set out in ES Chapter 17: SETR **[APP-054]**. • An Outline, Skills, Supply Chain and Employment Plan (OSSCEP) **[APP-552]** will be prepared prior to the commencement of construction. This will set out measures that the Applicant will implement in order to advertise and promote employment opportunities associated with the Scheme in construction and operation locally.

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Part 5.14 - Traffic and Transport Paragraph 5.14.7 Paragraph 5.14.8	The applicant should prepare a travel plan including demand management and monitoring measures to mitigate transport impacts. The applicant should also provide details of proposed measures to improve access by active, public and shared transport to: • Reduce the need for parking associated with the proposal. • Contribute to decarbonisation of the transport network; and • Improve user travel options by offering genuine modal choice. The assessment should also consider any possible disruption to services and infrastructure (such as road, rail and airports).	The OCTMP) **[REP3-064]** provides a framework for the management of construction vehicle movements (freight and worker movements) to and from the Scheme. It will ensure that the effects of the construction phase are minimised. The OCTMP sets out construction access arrangements, construction vehicle routing, construction vehicle trip generation, and the management/mitigation measures. An OCTMP **[REP3-064]** outlines measures that will be included in the final OCTMP to mitigate transport impact, manage demand, and improve and encourage construction staff to access the Order limits by public transport, cycling and reduce car transport to and parking at, the Order Limits.
Paragraph 5.14.21	The Secretary of State should only consider refusing development on highways grounds if there would be an unacceptable impact on highway safety, residual cumulative impacts on the road network would be severe, or it does not show how consideration has been given to the provision of adequate active public or shared transport access and provision.	Chapter 13: Transport and Access of the ES **[REP2-003]** states that there are anticipated to be no significant adverse effects on vehicle travellers, Non-Motorised Users (NMUs) or public transport users as a result of the construction, operation or decommissioning of the Scheme. The Scheme is also expected to have a negligible impact on accidents and safety for the remainder of the highway network.

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		The OCTMP has been prepared to minimise the impact of construction vehicle movement **[REP3-064]**. As part of the ODS **[REP1-135]**, a Decommissioning Traffic Management Plan will be agreed to mitigate the impacts of decommissioning activities at the relevant time to reflect the conditions at the time. Therefore, it is considered that the Scheme is compliant with this policy.
Part 5.15 – Resource and Waste Management Paragraph 5.15.1	Government policy on hazardous and non-hazardous waste is intended to protect human health and the environment by producing less waste and by using it as a resource wherever possible. Where this is not possible and disposal is required as a last resort, waste management regulation ensures that waste is disposed of in a way that is least damaging to the environment and to human health.	Section 7.8.35 of ES Chapter 7 Climate Change **[APP-044]** quantifies the estimated volume of waste that is to be produced during construction, section 7.8.58 during operation. The impact during the decommissioning phase is expected to be less than what has been considered for the construction phase. The Scheme will seek to minimise and design out waste streams where possible. Opportunities to re-use materials, such as BESS equipment for renewable wind storage, will be explored prior to the recycling of equipment.

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Paragraph 5.15.3	Disposal of waste should only be considered where other waste management options are not available or where it is the best overall environmental outcome.	The Scheme seeks to reuse wasted equipment where a second life use is possible. Where it is not, materials will be recycled as far as practical. These measures are captured within the OCEMP **[REP1-131]** and the ODS **[REP1-135]**.
Paragraph 5.15.8	The applicant should set out the arrangements that are proposed for managing any waste produced and prepare a report that sets out the sustainable management of waste and use of resources throughout any relevant demolition, excavation, and construction activities.	The Scheme has been designed and will be constructed and operated to minimise the creation of waste, maximise the use of recycled materials and assist the collection, separation, sorting, recycling and recovery of waste arising from the development during its use. The proposed arrangements for managing any waste produced by the Scheme, in accordance with the waste hierarchy, are set out in the OCEMP **[REP1-131]**, OOEMP **[EX4/GH7.2_B]** and ODS **[REP1-135]**.
Part 5.16 - Water Quality and Resources Paragraph 5.16.5	Where possible, applicants are encouraged to manage surface water during construction by treating surface water runoff from exposed topsoil prior to discharging and to limit the discharge of suspended solids e.g., from car parks or other areas of hard standing, during operation.	The OCEMP **[REP1-131]** sets out measures to manage surface water runoff during the construction period, including limiting the discharge of suspended solids. This includes: • Appropriate pollution control measures as agreed with the sewerage undertaker or the Environment Agency as appropriate.

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		• Following the relevant sections of BS 6031: Code of Practice for Earthworks for the general control of site drainage. • Where practical, undertaking earthworks during the drier months of the year. • Topsoil/subsoil will be stored a minimum of 30m from watercourses on flat lying land. Where this not practicable, and it is to be stockpiled for longer than a two-week period, the material will either be covered with geotextile mats, seeded to promote vegetation growth, or runoff prevented from draining to a watercourse without prior treatment; and • Runoff storage areas for the settlement of excessive fine particulates in runoff will be provided.
Paragraph 5.16.6	Applicants are encouraged to consider protective measures to control the risk of pollution to groundwater beyond those outlined in River Basin Management Plans and Groundwater Protection Zones – this could include, for example, the use of protective barriers.	The OCEMP **[REP1-131]** details the measures that would be undertaken during construction to mitigate the temporary effects on the water environment. This includes good practice methods which would also focus on managing the risk of pollution to surface waters and the groundwater environment.

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		As set out in the Drainage Strategy for the BESS in Annex J of Appendix 10.11 of ES Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-057]** The BESS area will be lined and outfalls will be controlled by automatically actuated valves, so that fire suppression water is contained.
Paragraph 5.16.7	The ES should in particular describe: • The existing quality of waters affected by the proposed project and the impacts of the proposed project on water quality, noting any relevant existing discharges, proposed new discharges and proposed changes to discharges. • Existing water resources affected by the proposed project and the impacts of the proposed project on water resources, noting any relevant existing abstraction rates, proposed new abstraction rates and proposed changes to abstraction rates (including any impact on or use of mains supplies and reference to Catchment abstraction Management 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	Section 10.6 of ES Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]** sets out the baseline conditions of water receptors for all the sites and surrounding areas with regards to water quality, including the existing quality and physical characteristics of waters nearby and potentially affected by the Scheme. The potential impacts of the Scheme on water bodies and protected areas are set out in the Water Framework Directive Assessment [**REP1-155]**. The Scheme is not located within a Source Protection Zone. The potential impacts of climate change have been incorporated into the assessments set out in ES Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]**.

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	Environment) Water Framework Directive) (England and Wales) Regulations 2017 and source protection zones (SPZs) around potable groundwater abstractions. • How climate change could impact any of the above in the future. • Any cumulative effects.	

2.2 National Policy Statement EN-3

Table 2: National Policy Statement for Renewable Energy Infrastructure (EN-3) (November 2023)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Paragraph 1.1.2	Electricity generation from renewable sources is an essential element of the transition to net zero and meeting our statutory targets for the sixth carbon budget (CB6). Our analysis suggest that demand for electricity is likely to increase significantly over the coming years and could more than double by 2050. This could require a fourfold increase in low carbon electricity generation, with most of this likely to come from renewables.	As explained in the Statement of Need **[APP-556]**, the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low carbon electricity to help meet the UK's urgent need to decarbonise with solar technology supported by recent government policy. Its proposed National Electricity Transmission System (NETS) connection means that it would play its part in helping National Grid ESO (NGESO) manage the national electricity system to ensure security of supply and bring cost benefits to electricity

Table 2: National Policy Statement for Renewable Energy Infrastructure (EN-3) (November 2023)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		consumers, both of which are identified in government policy as being required for resilient energy supplies in the future. The meaningful and timely contributions offered by the Scheme to UK decarbonisation and security of supply while helping lower bills for consumers throughout its operational life, will be critical on the path to Net Zero. Without the Scheme, a significant and vital opportunity to develop a large-scale low-carbon generation scheme will have been passed over, increasing materially the risk that future Carbon Budgets and Net Zero 2050 will be achieved.
Part 2.4 Climate change adaptation Paragraph 2.4.11	Solar photovoltaic PV 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.	As outlined in Chapter 7: Climate Change of the ES, **[APP-044]** account of the effects of climate change have been taken in the design of the Scheme, and its construction and decommissioning. This includes: • The effect of projected temperature increases on electrical equipment over the course of the Scheme's design life has been taken into account. Inverters (PV and BESS) will have a cooling system installed to control the temperature and allow the inverters to operate efficiently in warmer conditions. The PV modules and transformers have a wide range of

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		acceptable operating temperatures, and it has been determined that increasing temperatures will not adversely affect their operation. • Any health and safety plans developed for construction and decommissioning activities will be required to account for potential climate change impacts on workers, such as flooding and heatwaves. • The design of drainage systems will ensure that there will be no significant increases in flood risk downstream during storms up to and including the 1 in 100 (1%) annual probability design flood, with an allowance of 20% for climate change. A Decommissioning Environmental Management Plan (DEMP) (taking account of climate change risks at the time) will be prepared prior to decommissioning. An ODS **[REP1-135]** is provided as part of the application, which secures the production of the DEMP. ES Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]** and Flood Risk Assessments in ES Appendices 10.1 to 10.10 **[APP-098 to APP-102, APP-104 to APP-107,**

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		REP1-053, REP1-055, REP1-057] have considered the potential impacts of climate change. As the Site is at predominantly low risk from flooding from all sources, the reasonable 'worst case' is limited to the placement of Solar PV modules and string inverters mounted on the panels within Flood Zone 2 and Flood Zone 3 towards the east of the Site. The residual flood risk will be negligible once mitigation is included.
Section 2.5: Consideration of Good Design for Energy Infrastructure		
Paragraph 2.5.2	Proposals for renewable energy infrastructure should demonstrate good design, particularly in respect of landscape and visual amenity, opportunities for co-existence/co-location with other marine and terrestrial uses, and in the design of the project to mitigate impacts such as noise and effects on ecology and heritage.	As detailed in Section 6.4 of the Planning Statement **[EX4/GH7.15_B],** good design has been a fundamental consideration from the outset of the Scheme. The Project Principles as set out in Concept Design Parameters and Principles **[REP1-151]** 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 opportunities for enhancement and

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		balance the need for flexibility and certainty within the DCO Application. ES Chapter 8: Landscape and Visual Impact **[APP-045]** has informed the iterative design process, including taking account of published landscape character assessment guidance and fieldwork analysis. This is demonstrated in the Design Approach Document **[APP-560]**. The overall objective of the landscape design is to integrate the Scheme into its landscape setting and avoid or minimise adverse landscape and visual effects as far as practicable. The design has been developed in collaboration with the wider design team, other specialists and the Host Authorities' landscape advisors to achieve a solution that achieves this objective whilst maximising opportunities to deliver net gains in biodiversity gain. Accordingly, the landscape design aims to achieve the following: • To integrate the Scheme into the existing landscape pattern as far as possible by retaining and following existing features, including vegetation, where practicable.

Table 2: National Policy Statement for Renewable Energy Infrastructure (EN-3) (November 2023)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		• To replace vegetation lost because of construction of the Scheme through areas of new planting. • To filter and screen more prominent components of the Scheme in views from visual receptors. Details of the landscape measures embedded into the Scheme design, including a summary of their environmental functions is presented in the OLEMP **[REP1-137]**. 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 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). 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

Table 2: National Policy Statement for Renewable Energy Infrastructure (EN-3) (November 2023)		
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		mitigate the visual impact of the scheme and also provide 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.
Section 2.6: Flexibility in the Project Details		
Paragraph 2.6.1 Paragraph 2.6.2 Paragraph 2.6.3	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. 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. Full guidance on how applicants and the Secretary of State should manage flexibility is set out in Section 4.3 of EN-1.	The Applicant is seeking flexibility in the Scheme as set out in Section 4.3 in Chapter 4: Scheme Description of the ES **[REP1-031]**. The flexibility is to address uncertainties in the Scheme design and to allow for the most up to date technology possible to be utilised at the time of construction. The flexibility is sought by using the 'Rochdale Envelope' approach, which allows assessment of the maximum parameters for the Scheme, while ensuring all potentially significant effects (positive or adverse) are considered. The maximum design scenarios are identified from the range of potential options for each design parameter for the Scheme.

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		The maximum design scenario assessed is therefore the scenario which would give rise to the greatest potential impact. The maximum design scenarios are set out the in the Concept Design Parameters and Principles **[REP1-151]**, which is secured by a Requirement in the draft DCO **[REP3-024]**.
Paragraph 2.10.9 Paragraph 2.10.13 Paragraph 2.10.14	The government has committed to sustained growth in solar capacity to ensure that we are on a pathway that allows us to meet net zero emissions by 2050. As such, solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector. Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation. Solar farms can be built quickly and, coupled with consistent reductions in the cost of materials and improvements in the efficiency of panels, large-scale solar is now viable in some cases to deploy subsidy free.	As explained in the SoN **[APP-556]**, the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable and low carbon electricity generation system which is sufficient to meet future demand. The government expects solar technology to play a major role in delivering of these objectives. This paragraph further emphasises that large-scale development, in particular, is needed to meet the government's objectives. The Scheme directly accords with this.
Paragraph 2.10.19	Irradiance will be a key consideration for the applicant in identifying a potential site as the amount of electricity generated on site is directly affected by irradiance levels. Irradiance of a site will in turn be affected by surrounding topography, with an uncovered or exposed site of good elevation and favourable south facing aspect more likely to increase year	As shown in Figure 16 of the SoN **[APP-556]**, the Scheme is proposed to be located in one of the higher solar irradiation areas of the UK. This increases the benefit it will bring to the UK, in relation to the bulk generation of low carbon electricity per MW installed. The SoN **[APP-**

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	round irradiance levels. This in turn affects the carbon emission savings and the commercial viability of the site.	**556]** also concludes that the site is of a size and has topography which meets the requirements of the Scheme to generate significant amounts of electricity and store it.
Paragraph 2.10.20	In order to maximise irradiance, applicants may choose a site and design its layout with variable and diverse panel aspects, and panel arrays may also follow the movement of the sun in order to further maximise the solar resource.	The Scheme, as described in ES Chapter 4: Scheme Description **[REP1-031]**, seeks consent for both tracker panels and fixed panel options within the array Sites. The use and distribution of these across the Sites will be subject to further consideration as part of the detailed design for the Scheme, save for any locations where the use of one type of panel is required as a mitigation measure.
Paragraph 2.10.25 Paragraph 2.10.26	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. Where this is the case, applicants should consider the cumulative impacts of situating a solar farm in proximity to other energy generating stations and infrastructure.	The Scheme proposes to connect to an existing National Grid Substation (Grendon National Grid Substation), which is located on one of the major connections. As explained at Section 4.4 of the SoN **[APP-556]**, by connecting at Grendon Grid Substation, the Scheme is making use of an existing connection point and transmission infrastructure in a way which does not present the risk of overload or congestion on the NETS during any period of foreseen operation, and provides a regional source of locally generated bulk low carbon supplies of electricity to consumers in Northamptonshire and the wider Midlands area. Section 8.2 of the

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		SoN **[APP-556]** discusses this point further and provides additional evidence which underpins Grendon National Grid Substation as an excellent point of connection for the Scheme. The Site Selection Assessment **[REP1-037]** sets out the detailed site selection process undertaken by the Applicant.
Paragraph 2.10.28 Paragraph 2.10.29	Solar is a highly flexible technology and as such can be deployed on a wider variety of land types. 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. Best and Most Versatile agricultural land is defined as land in Grades 1, 2 and 3a of the Agricultural Land Classification.	Although the majority (65%) of the Order Limits comprises BMV agricultural land, these are justified by particular factors related to their location and context within the Scheme, the wider landholding and in relation to adjacent and surrounding land. Table 5:9: Stage 4 – Design Updates up to DCO Submission of ES Chapter 5: Alternatives and Design Evolution **[APP-042]** sets out the changes made to the Scheme following the detailed ALC Technical Report **[APP-172]** and provides the detailed justification for retaining the areas of BMV for the Scheme as well as an assessment of alternative sites for the Scheme. Other benefits of the Scheme are explained in Section 4 of this Planning Statement **[EX4/GH7.15_B]**.

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		As stipulated by this policy, land type should not be a predominating factor in determining the suitability of the site location.
Paragraph 2.10.30 Paragraph 2.10.31	Whilst the development of ground mounted solar arrays is not prohibited on Best and Most Versatile agricultural land, or sites designated for their natural beauty, or recognised for ecological or archaeological importance, the impacts of such are expected to be considered and are discussed under paragraphs 2.10.66-2.10.83 and 2.10.98-2.10.100. It is recognised that at this scale, it is likely that applicants' developments may use some agricultural and, however, applicants should explain their choice of site, noting the preference for the development to be on suitable brownfield, industrial and low and medium grade agricultural land.	Although 65% of the Order Limits comprises BMV agricultural land, the need for the Scheme to help meet the UK's 2050 net zero carbon obligations. Other benefits of the Scheme are explained in Section 6.18 of the Planning Statement **[EX4/GH7.15_B]**. The Site Selection Assessment **[REP1-037]** explains the choice of site as required by this paragraph and confirms that there are insufficient areas of available non-BMV land without constraints on which to accommodate the entire Scheme.
Paragraph 2.10.33	The Agricultural Land Classification (ALC) is the only approved system for grading agricultural quality in England and Wales, and, if necessary, field surveys should be used to establish the ALC grades in accordance with the current, or any successor to it, grading criteria and identify the soil types to inform soil management at the construction, operation and decommissioning phases in line with Defra Construction Code.	The ALC Technical Report is provided in Appendix 20.1 of the ES **[APP-172]**. The ALC Technical Report includes baseline information for the Cable Route Corridor, based on desk study information. This is because the development proposed is a buried cable with the interruption of the existing agricultural use limited to the brief cable laying operation. The provision of a detailed Soil Management Plan (building on measures outlined in the Outline Soil Management Plan **[APP-550]**) will

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		ensure the preservation of the soil resource at all the Sites.
Paragraph 2.10.35 Paragraph 2.10.36	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. 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.	A Transport Assessment, Appendix 13.1 of the ES **[APP-150]** has been prepared to assess the suitability and impact of the necessary access to the Order limits. This concludes that the Scheme with respect to transport and access is considered to be in accordance with relevant national and local policy and that it avoids any adverse impacts on highway safety or any severe residual cumulative impacts on the road network.
Paragraph 2.10.37 Paragraph 2.10.38 Paragraph 2.10.39	Developers will usually need to construct on site access routes for operation and maintenance activities, such as footpaths, earthworks, or landscaping. In addition, sometimes access routes will need to be constructed to connect solar farms to the public road network. Applications should include the full extent of the access routes for operation and maintenance and their effects.	A Transport Assessment, Appendix 13.1 **[APP-150]** of the ES has been prepared to assess the suitability and impact of the necessary access to the Order limits. This concludes that the Scheme with respect to transport and access is considered to be in accordance with relevant national and local policy and that it avoids any adverse impacts on highway safety or any severe residual cumulative impacts on the road network.
Paragraph 2.10.40 Paragraph 2.10.41 Paragraph 2.10.42	Proposed developments may affect the provision of public rights of way networks. Public rights of way may need to be temporarily closed or diverted to enable construction, however, applicants should keep, as far as is	There are several PRoWs within or abutting the Scheme. These are shown Section 4 of the OPRoWMP **[REP1-147]**. The exiting PRoWs are predominantly used for recreational

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Paragraph 2.10.43 Paragraph 2.10.44	practicable and safe, all public rights of way that cross the proposed development site open during construction and to protect users where a public right of way borders or crosses the site. 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. Applicants are encouraged where possible to minimise the visual impacts of the development for those using existing public rights of way, considering the impact this may have on any other visual amenities in the surrounding landscape. 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.	purposes and form part of a wide network of PRoWs in the surrounding area providing residents with alternative routes. As detailed in the OPRoWMP **[REP1-147]**, PRoWs will be kept open throughout all phases of the Scheme, with appropriate safety measures in place. Where diversions cannot be avoided during the construction period, these would be convenient, clearly signed and for as short a duration as is necessary, usually overnight. ES Chapter 8: LVIA **[APP-045]** sets out the mitigation measures to minimise the visual impacts of the Scheme from those using existing rights of way, which include green infrastructure planting, such as new hedgerows on existing public rights of way.
Paragraph 2.10.45	Applicants should set out detail 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 OPRoWMP **[REP1-147]** is provided as part of this submission which sets how the public rights of way will be managed.
Paragraph 2.10.46 Paragraph 2.10.47	Security of the site is a key consideration for developers. Applicants may wish to consider not only the availability of natural defences such as steep gradients, hedging and rivers, but also perimeter security measures such as fencing, electronic security, CCTV, and lighting, with the measures proposed on a site-specific basis.	Security measures, including fencing and CCTV are described in Chapter 4: Scheme Description of the ES **[REP1-031]**.and are taken into account in the assessment presented in the ES **[APP-037 to APP-544]**.

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	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.	Details of the site security during the construction and operational stage are also set out in the OCEMP **[REP1-131]** and OOEMP **[EX4/GH7.2_B]** Site security during construction will be managed by the contractor(s). The site security fencing will remain in place throughout the duration of the construction period. Any storage of materials will be kept secure to prevent theft or vandalism. A safe system for accessing the materials storage areas would be implemented by the contractor(s). The Sites will subject several security risk management threat assessments during the development, construction, operation, and ultimately decommissioning phases.
Paragraph 2.10.63 Paragraph 2.10.64	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. In the case of underground cabling, applicants are expected to provide a method statement describing cable trench design, installation methodology, as well as details of the operation and maintenance regime.	Details of cables, cable trenches and construction methodology are provided in Chapter 4: Scheme Description of the ES **[REP1-031]**. All cables will be buried; there is no requirement for overhead electricity cables to be used or constructed as part of the Scheme. The Concept Design Parameters and Principles Approach Document **[REP1-151]** describes the cable design and installation for each works area for the construction, operational, maintenance and decommissioning phases in

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		accordance with OCEMP **[REP1-131]** and OLEMP **[REP1-137]**
Paragraph 2.10.69	Applicants should set out what would be decommissioned and removed from the site at the end of the operational life of the generating station, considering instances where it may be less harmful for the ecology of the site to keep or retain certain types of infrastructure, for example underground cabling, and where they may be socio-economic benefits in retaining site infrastructure after the operational life, such as retaining pathways through the site or a site substation.	Details of the decommissioning phase, including which elements will be decommissioned and which will be retained, are provided in Chapter 4: Scheme Description of the ES **[REP1-031]**. This sets out that the Solar PV Array Works Area and related components, Ancillary Infrastructure, substations and the BESS Compound will be removed and recycled or disposed of in accordance with good practice and market conditions at that time. The underground cable within the Grid Connection Route will be decommissioned in accordance with the applicable guidance and regulations at the time. Currently, the most environmentally acceptable opinion is considered to be leaving the cables in situ. The decommissioning of the Scheme will be addressed within the ODS **[REP1-135]**.
Paragraph 2.10.70	In many cases, not all aspects of the proposal may have been settled in precise detail at the point of application. Such aspects may include: • The type, number and dimensions of the panels; • Layout and spacing;	Chapter 2: EIA Process and Methodology **[APP-039]** and Chapter 4: Scheme Description of the ES **[REP1-031]** explain that the parameters for the project are defined by the Outline Design Principles, which have informed

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Paragraph 2.10.71	• The type of inverter or transformer; and • Whether storage will be installed (with the option to install further panels as a substitute). Applicants should set out a range of options based on different panel numbers, types and layout, with and without storage.	the assessments in the ES **[APP-037 to APP-544]**. The Works Plan **[REP3-008]** and design principles of the Design Approach Document **[APP-560]** define parameters for the Scheme. The approach to flexibility is explained in Chapter 4: Scheme Description of the ES **[REP1-031]**.
Paragraph 2.10.76 Paragraph 2.10.77 Paragraph 2.10.78 Paragraph 2.10.79	The applicant's ecological assessments should identify any ecological risk form developing on the proposed site. Issues that need assessment may include habitats, ground nesting birds, wintering and migratory birds, bats, dormice, reptiles, great crested newts, water voles and badgers. The applicant should use an advising ecologist during the design process to ensure that adverse impacts are avoided, minimised or mitigated in line with the mitigation hierarchy and biodiversity enhancements are maximised. The assessment may be informed by a 'desk study' of existing ecological records, an evaluation of the likely impacts of the solar farm upon ecological features and should specify mitigation to avoid or minimise these impacts, and any further surveys required.	Chapter 9: Ecology and Biodiversity of the ES **[REP1-033]** sets out all the protected species, habitats and other species identified as being of principal importance for the conservation of biodiversity within the study area for the Scheme. Chapter 9: Ecology and Biodiversity of the ES **[REP1-033]** clearly sets out the expected effects on the above receptors during the construction, operation and decommissioning phases of the Scheme. Additional mitigation measures are proposed during construction to mitigate the impact of breeding birds of open habitats (skylark). These include the provision of compensatory nesting habitats, further details of which are set out in the OLEMP **[REP1-137]**.

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Paragraph 2.10.80 Paragraph 2.10.81	Applicants should consider earthworks associated with construction compounds, access roads and cable trenching. 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 above at Paragraphs 2.10.18 and 2.10.19.	Earthworks required for the Scheme are described in Chapter 4: Scheme Description of the ES **[REP1-031]** and are taken into account by assessments in the ES **[APP-037 to APP-544]**. There are minimal earthworks identified for the Scheme. The Cable Route Corridor will require the redistribution and management of soil. An Outline Soil Management plan has been prepared to support the submission **[APP-550]**.
Paragraph 2.10.82	Applicants should consider how security and lighting installations may impact on the local ecology. Where pole mounted CCTV facilities are proposed, the location of these facilities should be carefully considered in order to minimise impact. If lighting is necessary, it should be minimised and directed away from areas of likely habitat.	Lighting and CCTV required for the Scheme are described in Chapter 4: Scheme Description of the ES **[REP1-031]** and are taken into account by the assessments in the ES **[APP-037 to APP-544]**. The location of this equipment has been carefully considered to minimise impact. Standard good practice measures would be employed to minimise light spill, including glare during construction, operation and decommissioning.
Paragraph 2.10.83	Applicants should consider how site boundaries are managed. If any hedges/scrub are to be removed, further surveys may be necessary to account for impacts. Buffer strips between perimeter fencing and hedges may be proposed, and the construction and design of any fencing should account for enabling mammal, reptile and other fauna access into the site if required to do so in the ecological report.	The ES **[APP-037 to APP-544]** takes account of all works to boundaries, and any works to hedgerows. Buffers to woodland and hedgerow are included, and proposals for fencing incorporate features to enable the movement of mammals, reptiles and other fauna.

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Paragraph 2.10.84 Paragraph 2.10.85 Paragraph 2.10.86 Paragraph 2.10.87 Paragraph 2.10.88	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. 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. 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. Culverting existing watercourses/drainage ditches should be avoided. Where culverting for access is unavoidable, application should demonstrate that no reasonable alternatives existing and where necessary it will only be in place temporarily for the construction period.	Flood Risk Assessments have been provided in **ES Appendices 10.1 to 10.10 [APP-098 to APP-102, APP-104 to APP-107, REP1-053, REP1-055, REP1-057]** Design and mitigation considerations have been set out in ES Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]**. The solar panels will be mounted on raised frames above surrounding ground level allowing flood water to flow freely underneath. Therefore, there will be no loss of floodplain volume as a result of the Scheme. The Scheme is free draining through perimeter gaps around all panels, allowing for infiltration as existing within the grassland/vegetation surrounding and beneath the panel. There will be minimal increase in impermeable area meaning the proposals will not increase surface water flood risk elsewhere. The Scheme has been designed to utilise existing access points and culverts where possible. It is anticipated that the Scheme will require the construction of one new culvert in site Green Hill F. With mitigation, the impact of this has been assessed as neutral and not

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		significant in Table 9.7 of ES Chapter 9: Ecology and Biodiversity **[REP1-033]**.
Paragraph 2.10.90	For projects in England, applicants should consider enhancement, management, and monitoring of biodiversity in line with the ambition as set out in the Environmental Improvement Plan and any relevant measures and targets, including statutory targets set under the Environment Act or elsewhere.	The Scheme has taken advantage of opportunities to conserve and enhance biodiversity and accords with this paragraph. A Biodiversity Net Gain (BNG) assessment, using Defra's Metric 4.0, has been provided with the DCO application **[REP1-043]**. This sets out the significant net gains in biodiversity that the Scheme will provide.
Paragraph 2.10.92	Applicants should consider whether they need to provide geotechnical and hydrological information (such as identifying the presence of peat at each site) including the risk of landslide connected to any development work.	The Applicant does not consider that the nature of the Order limits or the Scheme is such that this information is required.
Paragraph 2.10.97	Applicants should carry out a landscape and visual assessment and report it in the ES. Visualisations may be required to demonstrate the effects of a proposed solar farm on the setting of heritage assets and any nearby residential areas or viewpoints.	An assessment of the potential landscape and visual impacts associated with the construction, operation and decommissioning of the Scheme has been carried out and is presented in Chapter 8: Landscape and Visual Impact of the ES **[APP-045]**. Visualisations of the Scheme are set out in ES Figures 8.14.1 Viewpoint 1 Photography to ES Figures 8.14.NN13 Photography and Photomontages **[APP-334-APP-346].**

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		These 26 visualisations show Year 1 and Year 15, with five of the 26 showing Year 60.
Paragraph 2.10.98 Paragraph 2.10.99	Applicants should follow the criteria for good design set out in Section 4.6 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. 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 2.10.31-2.10.33 above).	Good design has been a key consideration from the outset. Chapter 8: Landscape and Visual Impact **[APP-045]** has informed the iterative design process, including taking account of published landscape character assessment guidance and fieldwork analysis. ES Chapter 8: Landscape and Visual Impact **[APP-045]** confirms that the Scheme has no impact on nationally designated landscapes. The overall objective of the landscape design is to integrate the Scheme into its landscape setting and avoid or minimise adverse landscape and visual effects as far as practicable. The design has been developed in collaboration with the wider design team, other specialists and the Host Authorities landscape advisors to achieve a solution that achieves this objective whilst maximising opportunities to deliver net gains in biodiversity gain. Accordingly, the landscape design aims to achieve the following: • To integrate the Scheme into the existing landscape patterns as far as possible by

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		retaining and following existing features, including vegetation, where practicable. • To replace vegetation lost because of construction of the Scheme through new areas of planting. • To filter and screen more prominent components of the Scheme in views from visual receptors. Details of the landscape measures embedded in to the Scheme design, including a summary of their environmental functions, is presented in the OLEMP **[REP1-137]**. Refer also to the Landscape and Ecology Mitigation Plans **[REP3-042, REP3-044, APP-209, REP3-046, APP-211, REP3-048, REP3-050, APP-214, APP-215, REP3-052, APP-217, REP3-054, APP-219]**.
Paragraph 2.10.100 Paragraph 2.10.101	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. The impact of the proposed development on established trees and hedges should be informed by a tree survey and arboricultural/hedge assessment as appropriate.	Refer to the Landscape and Ecology Mitigation and Plans, which are shown in Figures 4.10-4.20 **[REP3-042, REP3-044, APP-209, REP3-046, APP-211, REP3-048, REP3-050, APP-214, APP-215, REP3-052, APP-217, REP3-054, APP-219]**. The Landscape and Ecology Mitigation measures illustrate the use of extensive

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		landscape mitigation to screen the screen the Scheme from sensitive views. Site fencing has been proposed in proximity to existing hedgerows to allow the hedgerows to grow into the fencing to screen it where possible. This approach is secured through the OLEMP **[REP1-137]** with the management of existing and proposed hedgerows prescribed in this document. The submission is accompanied by a Tree Survey Schedule **[APP-170]**, Arboricultural Impact Assessment and Outline Arboricultural Method Statement **[APP-171]** and a Preliminary Ecological Appraisal **[APP-084]**.
Paragraph 2.10.103 Paragraph 2.10.105 Paragraph 2.10.106	Applicants should map receptors to qualitatively identify potential glint and glare issues and determine if a glint and glare assessment is necessary as part of the application. 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. When a glint and glare assessment is undertaken, the potential for solar PV panels, frames and supports to have a combined reflective quality may need to be assessed, although the glint and glare of the frames and supports is likely to be significantly less than the panels.	The ES Chapter 15: Glint and Glare **[APP-052]** confirms that the glint and glare effects of the Scheme have been shown not to be significant in EIA terms. Despite this, an Aviation Specialist was consulted to determine the impact of the Scheme on the William Pitt Airstrip and Sywell Aerodrome, set out in the Empirical Evidence on Glint and Glare from Solar PV Installations Near UK Aerodromes **[APP-572]**. This analyses existing solar farms around solar farms and demonstrates that modelled impacts from solar

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		farms do not occur in practice and therefore, no additional mitigation is proposed.
Paragraph 2.10.107 Paragraph 2.10.108 Paragraph 2.10.109 Paragraph 2.10.110	The impacts of solar PV developments on the historic environment will require expert assessments in most cases and may have effect both above and below ground. 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. 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. Equally solar PV developments may have a positive effect, for example, archaeological assets may be protected by a solar PV arm as the site is removed from regular ploughing and shoes or low-level piling is stipulated.	Heritage assets as defined in this policy have been considered and, where relevant, assessed in Chapter 12: Cultural Heritage of the ES **[APP-049]**. Section 12.8 of Chapter 12: Cultural Heritage of the ES **[APP-049]** assess the impacts and effects on heritage assets. Archaeological evaluations were undertaken to in addition to a desk-based assessment, including a geophysical survey (detailed magnetometry) of the whole scheme and targeted trial trenching. The ES **[APP-037-APP-544]** has therefore identified a suitable baseline from which to assess the Scheme in relation to this policy**.**
Paragraph 2.10.112 Paragraph 2.10.113	Applicant assessments should be informed by information from Historic Environment Record (HERs) or the local authority. 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 are expected to be carried out, using expertise where necessary and in consultation with the local planning authority, and should identify archaeological study areas and	The assessment set out in Chapter 12: Cultural Heritage of the ES **[APP-049]** has been informed by the HER and in consultation with the relevant Councils Scope and methodology for the archaeological investigation for each area of the Scheme has been agreed with and submitted to the relevant Councils prior to the work being undertaken.

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	propose appropriate schemes of investigation, and design measures, to ensure the protection of relevant heritage assets.	The Councils have also been kept updated with any relevant findings and issues. The details of the archaeological investigation work and mitigation measures are set out in Chapter 12 Cultural Heritage of the ES **[APP-049].**
Paragraph 2.10.114 Paragraph 2.10.115	In some instances, field studies may include investigative work (and may include trial trenching beyond the boundary of the proposed site) to assess the impacts of any ground disturbance, such as proposed cabling, substation foundations or mounting supports for solar panels on archaeological assets. The extent of investigative work should be proportionate to the sensitivity of, and extent of proposed ground disturbance in, the associated study area.	Archaeological evaluations were undertaken to in addition to a desk-based assessment, including a geophysical survey (detailed magnetometry) of the whole scheme and targeted trial trenching. The scope and specification of each field investigation have been set out in the Archaeological Evaluation Trenching Reports **[EX4/GH6.3.12.6_A]** and Archaeological Mitigation WSI **[APP-147]**. The results of these surveys (Appendices 12.2 **[APP-121]** and 12.6 **[EX4/GH6.3.12.6_A]**) have been incorporated in Section 12.8 of Chapter 12: Cultural Heritage of the ES **[APP-049]**.
Paragraph 2.10.116 Paragraph 2.10.117	Applicants should take account of the results of historic environment assessments in their design proposal. 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.	Section 12.7 of Chapter 12: Cultural Heritage of the ES **[APP-049]** outlines the mitigation measures embedded within the scheme design pertaining to cultural heritage. This includes the provision of stand-offs between the Scheme and heritage assets in order to help to preserve their setting during the construction, operational and decommissioning periods.

Table 2: National Policy Statement for Renewable Energy Infrastructure (EN-3) (November 2023)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		Appropriate and sensitive screening has also been developed and implemented to minimise the visual intrusion of the Scheme, while avoiding obscuring or intruding upon key views and relationships between heritage assets.
Paragraph 2.10.118	As the significance of a heritage asset derives not only from its physical presence but also from its setting, careful consideration should be given to the impact of large-scale solar farms which depending on their scale, design, and prominence, may cause substantial harm to the significance of the asset.	Chapter 12 Cultural Heritage **[APP-049]** of the ES has carefully assessed the impact of the Scheme on heritage assets (above and below ground) and their setting. There are no designated or non-designated heritage assets within the Order Limits. Within the wider, the following heritage assets have been scoped into the assessment: 4 Conservation Areas, 69 Listed Buildings, one Registered Parks and Garden, one Scheduled Monument, and 24 non-designated heritage assets. Chapter 12 Cultural Heritage **[APP-049]** of the ES indicates that during the construction stage most of the identified impacts to heritage assets would be **not significant**, with effects mostly ranging between **Neutral** and **Minor/Moderate Adverse** and during the operational stage no significant effects were identified to Historic Landscape Character parcels during the operation phase

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		Within each of the 9 Sites and within the Cable Route Corridor, non-designated archaeological assets and historic landscape character units have been identified. The cable route is proposed to be buried underground. As such any construction phase impacts to the setting of heritage assets as a result of the installation of the cable route would be temporary.
Paragraph 2.10.120 Paragraph 2.10.121	Modern solar farms are large sites that are mainly comprised of small structures that can be transported separately and constructed on-site, with developers designating a compound on-site for the delivery and assemblage of necessary components. Many solar farms will be sited in areas served by a minor road network. Public perception of the construction phase of solar farms will derive mainly from the effects of traffic movements, which is likely to involve smaller vehicles than typical onshore energy infrastructure but may be more voluminous. It is important that all sections of roads and bridges on the proposed delivery route can accommodate the weight and volume of the loads.	An OCTMP **[REP3-064]** is provided as part of the submission. This sets out the proposals to manage construction traffic and staff vehicles during the construction of the Scheme. It identifies the management of freight traffic i.e., HGVs to and from the designated construction compounds, as well as staff vehicles. The CTMP has been informed by extensive consultation with National Highways, West Northamptonshire, North Northamptonshire and Milton Keynes Highways.
Paragraph 2.10.123	Applicants should assess the various potential routes to the site for delivery of materials and components where the source of the materials is known at the time of the application and select the route that is the most appropriate. 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,	An OCTMP **[REP3-064]** is provided as part of the submission. This sets out the proposals to manage construction traffic and staff vehicles during the construction of the Scheme. It identifies the management of freight traffic i.e., HGVs to and from the designated construction

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Paragraph 2.10.124	applicants should assess the worst-case impact of additional vehicles on the likely potential routes.	compounds, as well as staff vehicles. The OCTMP has been informed by extensive consultation with National Highways, West Northamptonshire, North Northamptonshire and Milton Keyes Highways.
Paragraph 2.10.125	Applicants should ensure all sections of roads and bridges on the proposed delivery route can accommodate the weight and volume of the loads and width of vehicles. Although unlikely, where modifications to roads and/or bridges are required, these should be identified, and potential effects addressed in the ES.	As stated in the Transport Assessment, provided in Appendix 13.1 of the ES **[APP-150]**, a total of 47 access points across the Scheme are proposed for construction and operation of the Sites, Cable Corridor and Cable Construction Compounds. The majority of the access points will be improved existing field accesses. All have been assessed and designed for their appropriateness for the relevant vehicles that will utilise them. An OCTMP **[REP3-064]** is provided as part of the submission. This sets out the proposals to manage construction traffic and staff vehicles during the construction of the Scheme. It identifies the management of freight traffic i.e., HGVs to and from the designated construction compounds, as well as staff vehicles. The OCTMP has been informed by extensive consultation with West Northamptonshire, North Northamptonshire and Milton Keynes Councils and National Highways.

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		For abnormal loads, specialist contractor Wynns have prepared a report detailing the requirement movements which has been prepared in consultation with the relevant Councils. The movement of large (abnormal) loads is regulated by National Highways and will be subject to separate agreement with the relevant highway authorities and police through the Electronic Service Delivery for Abnormal Loads (ESDAL) system. A specific assessment of abnormal loads has been undertaken as part of the Transport Assessment. Appropriate routes for abnormal load movements and mitigation strategies to secure safe passage have been identified. This is shown in Appendix F of the Transport Assessment **[APP-150].**
Paragraph 2.10.126	Where a cumulative impact is likely because multiple energy infrastructure developments are proposed to use a common port and/or access route and pass through the same towns and villages, applicants should include a cumulative transport assessment as part of the ES. This should consider the impacts of abnormal traffic movements relating to the project in question in combination with those from any other relevant development. Consultation with the relevant local highways authorities is likely to be necessary.	Cumulative schemes for consideration have been agreed in consultation with West Northamptonshire, North Northamptonshire, Milton Keynes and National Highways and have been considered in the ES. These are detailed in Section 13.13 of Chapter 13: Transport and Access of the ES **[REP2-003]**. Chapter 13: Transport and Access of the ES **[REP2-003]** concludes that the transport and access impacts of the Scheme are not significant in EIA terms.

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Paragraph 2.10.128 Paragraph 2.10.129 Paragraph 2.10.130	In England, proposed enhancements should take account of the above factors and as set out in Sections 4.6 and 5.5 of EN-1 aim to achieve environmental and biodiversity net gain in line with the ambition set out in the Environmental Improvement Plan and any relevant measures and targets, including statutory targets set under the Environment Act or elsewhere. This might include maintaining or extending existing habitats and potentially creating new important habitats, for example, by installing cultivated strips/plots for rare arable plants, rough grassland margins, bumble bee plant mixes, and wild bird seed mixes. 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 Biodiversity Net Gain (BNG) assessment, using Defra's Metric 4.0, has been provided with the DCO application **[REP1-043].** This sets out the significant net gains in biodiversity that the Scheme will provide.The Scheme has taken advantage of opportunities to conserve and enhance biodiversity and accords with this policy.
Paragraph 2.10.131 Paragraph 2.10.132 Paragraph 2.10.133	Applicants should consider the potential to mitigate landscape and visual impacts through, for example, screening with native hedges, trees and woodlands. 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. 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.	Refer to the Landscape and Ecology Mitigation Plans **[REP3-042, REP3-044, APP-209, REP3-046, APP-211, REP3-048, REP3-050, APP-214, APP-215, REP3-052, APP-217, REP3-054, APP-219]**, which are shown in Figures 4.10-4.20 of the ES. The Landscape and Ecology Mitigation Plans **[REP3-042, REP3-044, APP-209, REP3-046, APP-211, REP3-048, REP3-050, APP-214, APP-215, REP3-052, APP-217, REP3-054, APP-219]** illustrate the use of extensive

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		landscape mitigation to screen the Scheme from sensitive views. Site fencing has been proposed in proximity to existing hedgerows to allow the hedgerows to grow into the fencing to screen it where possible. This approach is secured through the OLEMP **[REP1-137]** with the management of existing and proposed hedgerows prescribed in this document. Details of operational lighting are set out by Chapter 4: Scheme Description of the ES **[REP1-031]**. During the operational phase, lighting is not required within the Solar Arrays. Motion sensing security lighting will be provided within substations and within the BESS, only to be used for maintenance and security purposes. Temporary site lighting will be required during construction and decommissioning to enable safe working practices and will be designed as far as reasonably practical to minimise the potential for light spillage.
Paragraph 2.10.134	Applicants should consider using, and in some cases the Secretary of State may require, solar panels to comprise (or be covered) with anti-glare/non-reflective coating with a specified angle of maximum reflection attenuation for the lifetime of the permission.	Chapter 4: Scheme Description of the ES **[REP1-031]** sets out that the Solar PV panels will consist of a series of photovoltaic cells beneath a layer of toughed glass. ES Chapter 15: Glint and Glare **[APP-052]** considers both fixed and tracker panel options

Table 2: National Policy Statement for Renewable Energy Infrastructure (EN-3) (November 2023)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		as either type of panel may constitute the worst-case scenario.
Paragraph 2.10.137 Paragraph 2.10.138	The ability of the applicants to microsite-specific elements of the proposed development during the construction phase should be an important consideration by the Secretary of State when assessing the risk of damage to archaeology. 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 discovering of previously unknown archaeology, arise.	The final layout of the components of the Scheme is required to be within the Works Areas identified by the Works Plan **[REP3-008]** and within the Design Approach Document **[APP-560]**. These enable micrositing. The approach to flexibility is explained in Chapter 4: Scheme Description of the ES **[REP1-031]**
Paragraph 2.10.139 Paragraph 2.10.140	In some cases, the local highway authority may request that the Secretary of State impose controls on the number of vehicles 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. Where the Secretary of State agrees that it is necessary, requirements could be imposed on development consent.	As stated in the Transport Assessment, provided in Appendix 13.1 of the ES **[APP-150]**, as agreed with West Northamptonshire, North Northamptonshire, Milton Keynes and National Highways, construction HGVs will travel to/from the Site via agreed routes to ensure that the effects of the temporary construction phase on the highway network are minimised. A vehicle routing plan showing the agreed routing strategy for HGVs is contained with the CTMP **[REP3-064]**.
Paragraph 2.10.141	Where cumulative impacts 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	Cumulative schemes for consideration have been agreed in consultation with West Northamptonshire, North Northamptonshire,

Table 2: National Policy Statement for Renewable Energy Infrastructure (EN-3) (November 2023)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Paragraph 2.10.142	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. 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.	Milton Keynes and National Highways and have been considered in the ES. These are detailed in Section 13.13 of Chapter 13: Transport and Access of the ES **[REP2-003]**. Chapter 13: Transport and Access of the ES **[REP2-003]** concludes that no cumulative impacts upon the highway network are envisaged based on the assessment in the ES. There would be no cumulative significant adverse effect on transport and access on any or part of the Study Area.
Paragraph 2.10.143 Paragraph 2.10.126	Once consent for a scheme has been granted, applicants should liaise with the relevant local high 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. 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.	An OCTMP) **[REP3-064]** is provided as part of the submission. This sets out the proposals to manage construction traffic and staff vehicles during the construction of the Scheme. It identifies the management of freight traffic i.e., HGVs to and from the designated construction compounds, as well as staff vehicles. The OCTMP has been informed by extensive consultation with National Highways, West Northamptonshire, North Northamptonshire and Milton Keynes Highways. It includes proposals for the Scheme's Transport Coordinator to liaise as appropriate with local transport and traffic groups, local

Table 2: National Policy Statement for Renewable Energy Infrastructure (EN-3) (November 2023)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		planning authorities, local highway authorities and National Highways.
Paragraph 2.10.147 Paragraph 2.10.148 Paragraph 2.10.149	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. Such a requirement should also secure the decommissioning of the generating of the generating station after the expiration of its permitted operation to ensure that inoperative plant is removed after its operational life. An upper limit of 40 years is typical, although applicants may seek consent without a time period or for differing time periods for operation.	The Scheme will be decommissioned at the end of its operational life in accordance with the ODS **[REP1-135]**. The Applicant has committed to a maximum operational life of the Scheme of no more than 60 years as set out in ES Chapter 4: Scheme Description **[REP1-031]**.
Paragraph 2.10.150 Paragraph 2.10.151	The time limited nature of the solar farm, where a time limit is sought as a condition of consent, is likely to be an important consideration for the Secretary of State. The Secretary of State should consider the period of time the applicant is seeking to operate the generating station as well as the extent to which the site will return to its original state when assessing impacts such as landscape and visual effects and potential effects on the settings of heritage assets and nationally designated landscapes.	The Scheme will be decommissioned at the end of its operational life in accordance with an ODS **[REP1-135].** The Applicant has committed to a maximum operational life of the Scheme of no more than 60 years as set out in ES Chapter 4: Scheme Description **[REP1-031]**. The assessments of the ES **[APP-037-APP-544]**. have taken account of this. Chapter 4: Scheme Description of the ES **[REP1-031]** describes in detail how the Order limits would be left on completion of decommissioning.
Paragraph 2.10.154	Water management is a critical component of site design for ground mount solar plants. Where previous management of the site has involved intensive agricultural practice, solar sites can deliver significant	An assessment of the potential hydrology impacts of the scheme is provided in ES

Table 2: National Policy Statement for Renewable Energy Infrastructure (EN-3) (November 2023)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Paragraph 2.10.155	ecosystems services value in the form of drainage, flood attenuation, natural wetland habitat, and water quality management. The Secretary of State will consider the worst-case effects in its consideration of the application and consent.	Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]**. This is supported by Flood Risk Assessments in ES Appendices 10.1 to 10.10 **[APP-098 to APP-102, APP-103 to APP-107, REP1-053, REP1-055, REP1-057]**.
Paragraph 2.10.157	The Secretary of State will consider the landscape and visual impact of any proposed PV farm, taking account of any sensitive visual receptors, and the effect of the development on landscape character, together will the possible cumulative effect with any existing or proposed development. Nationally designated landscapes (National Parks, The Broads and Areas of Outstanding Beauty) are afforded extra protection due to their statutory purpose. Development in these areas needs to satisfy policy as set out in EN-1 Section 5.10.	The Scheme complies with this requirement through the provision of and Landscape and Visual Chapter within the ES **[APP-045]**. The impacts on landscape and visual amenity have influenced the iterative design of the Scheme. The proposals have considered the need to mitigate landscape and visual impacts. Details of the included within Chapter 8: Landscape and Visual Impact **[APP-045]** and the OLEMP **[REP1-137]**. ES Chapter 8: Landscape and Visual Impact **[APP-045]** confirms that there is no impact on nationally designated landscapes due to the Scheme.
Paragraph 2.10.158	Solar PV panels are designed to absorb, not reflect, irradiation. However, the Secretary of State should assess the potential impact of glint and glare on nearby homes, motorists, public rights of way, and aviation infrastructure (including aircraft departure and arrival flight paths).	ES Chapter 15: Glint and Glare **[APP-052]** has been provided as part of this submission. The ES Chapter 15: Glint and Glare **[APP-052]** confirms that the glint and glare impacts of the

Table 2: National Policy Statement for Renewable Energy Infrastructure (EN-3) (November 2023)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		Scheme have been shown not to be significant in EIA terms.
Paragraph 2.10.159	Whilst there is some evidence that glint and glare from solar farms can be experienced by pilots and air traffic controllers in certain conditions, there is no evidence that glint and glare from solar farms results in significant impairment on aircraft safety. Therefore, unless a significant impairment can be demonstrated, the Secretary of State is unlikely to give any more than limited weight to claims of aviation interference because of glint and glare from solar farms.	ES Chapter 15: Glint and Glare **[APP-052]** has been provided as part of this submission. The ES Chapter 15: Glint and Glare **[APP-052]** confirms that the glint and glare impacts of the Scheme have been shown not to be significant in EIA terms.
Paragraph 2.10.160	Solar farms are generally consented on the basis that they will be time limited in operation. The Secretary of State should, therefore, consider the length of time for which consent is sought when considering the impacts of any indirect effect on the historic environment, such as effects on the setting of designated heritage assets.	The operational lifetime of the Scheme is a maximum of 60 years. However, if equipment is still operating successfully and safely, the developer may choose to operate beyond the Scheme's design life. This is a common occurrence for generating station; many stations operate beyond the design life if they are well maintained. The Applicant has committed to decommission the Scheme no later than 60 years of operation and it will be decommissioned in accordance with the ODS **[REP1-135]** after the end of the operational phase.

2.3 National Policy Statement EN-5

Table 3: National Policy Statement EN-5 (November 2023)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Paragraph 1.1.1	The security and reliability of the UK's current and future energy supply is highly dependent on having an electricity network, which will enable the new electricity generation, storage and interconnection infrastructure that our country needs to meet the rapid increase in electricity demand required to transition to net zero, while maintaining energy security.	As explained in the Statement of Need **[APP-556]**, the meaningful and timely contributions offered by the Scheme to UK decarbonisation and security of supply, while helping lower bills for consumers throughout its operational life, will be critical on the path to Net Zero. Without the scheme, a significant and vital opportunity to develop a large-scale low-carbon generation scheme will have been passed over, increasing materially the risk that future Carbon Budgets and Net Zero 2050 will not be achieved.
Paragraph 2.2.6 Paragraph 2.2.7	Moreover, the locational constraints identified above do not of course, exempt applicants from their duty to consider and balance the site-selection considerations set out below, much less the policies on good design and impact mitigation detailed in Sections 2.4-2.9. 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.	Chapter 5: Alternatives and Design Evolution of the ES **[APP-042]** sets out the alternative designs that have been assessed by the Applicant in developing the submitted siting and design of the Scheme. It takes account of environmental, social and economic issues to determine the preferred location of the Scheme.
Paragraph 2.2.8 Paragraph 2.2.9	There will usually be a degree of flexibility in the location of the development's associated substations, and the applicants should consider carefully their location, as well as their design. In particular, the applicant should consider such characteristics as the local topography, the possibilities for screening of the infrastructure and/or other	Chapter 5: Alternatives and Design Evolution of the ES **[APP-042]** and the Site Selection Assessment **[REP1-037]** provide details as to methodology and determination of the preferred options for the onsite substations. It has taken into account technical feasibility and

Table 3: National Policy Statement EN-5 (November 2023)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	options to mitigate any impacts. (See Section 2.10 below and Section 5.10 in EN-1).	environmental constraints of each location. The Grid Connection Statement **[APP-557]** provides more explanation as to why the substation locations were chosen.
Paragraph 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.	There are no nationally designated landscapes within the Order Limits, including National Landscapes.
Paragraph 2.3.1 Paragraph 2.3.2	Section 4.10 of EN-1 sets out the generic considerations that applicants and the Secretary of State should take into account in order to ensure that electricity networks infrastructure is resilient to the effects of climate change. As climate change is likely to increase risk 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;	Consideration has been given to incorporating nature-based climate change adaption into Scheme, and proposals for SuDS have been included, as outlined within the OOEMP **[EX4/GH7.2_B]** and the Landscape and Ecology Mitigation Plans **[REP3-042, REP3-044, APP-209, REP3-046, APP-211, REP3-048, REP3-050, APP-214, APP-215, REP3-052, APP-217, REP3-054, APP-219].**

Table 3: National Policy Statement EN-5 (November 2023)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	• 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.	
Paragraph 2.3.3	Section 4.10 of EN-1 advises that the resilience of the project to the effects of climate change must be assessed in the Environmental Statement (ES) accompanying an application. For example, future increased risk of flooding would be covered in any flood risk assessment (See Sections 5.8 in EN-1). Consideration should also be given to coastal change (see sections 5.6 in EN-1).	Chapter 7: Climate Change of the ES **[APP-044]** assesses the Scheme in relation to its effects on climate and its resilience to climate change. Flood Risk Assessments (FRA) are provided at Appendices 10.1-10.10 of the ES **[APP-098 to APP-102, APP-104 to APP-107, REP1-053, REP1-055, REP1-057]**. The FRA provides a detailed assessment of the risk of flooding to and from the Scheme (taking account of climate change) and concludes that the risk of flooding will not be increased as a result of the construction, operation or decommissioning of the Scheme. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 2.4.1 Paragraph 2.4.2	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 **[APP-560]** details the iterative process and how the Scheme design has been developed.

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Paragraph 2.4.3	Applicants should consider the criteria for good design set out in EN-1 Section 4.7 at an early stage when developing projects. 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 the infrastructure.	The Site Selection Assessment **[REP1-037]** details the stages and methodology used in the assessment for determining the site selection process. The wider impacts of the Scheme have been captured, detailed, assessed, and mitigated for (where possible) through the production of the ES **[APP-037 to APP-544]**.
Paragraph 2.5.1	When planning and evaluating the proposed development's contribution to environmental and biodiversity net gain, it will be important – for both the applicant and the Secretary of State – to supplement the generic guidance set out in EN-1 (Section 4.6) with recognition that the linear nature of electricity networks infrastructure can allow for excellent opportunities to: • Reconnect important habitats via green corridors, biodiversity stepping zones, and reestablishment of appropriate hedgerows; and/or i. Connect people to the environment, for instance via footpaths and cycleways constructed in tandem with environmental enhancements.	A Biodiversity Net Gain (BNG) Assessment, using Defra's Metric 4.0 has been provided within the DCO application **[REP1-043]**. This sets out the significant net gains in biodiversity that the Scheme will provide. The Scheme has taken advantage of opportunities to conserve and enhance biodiversity and accords with this policy. The Scheme has therefore incorporated improvements in biodiversity and accords with this policy. See also Section 6.9 of the Planning Statement **[EX4/GH7.15_B]** for further detail on the biodiversity measures incorporated and compliance with planning policy.
Paragraph 2.6.2	Where the applicant does not own or wish to own the land in question, it should try to reach a voluntary agreement giving it sufficient rights and/or permissions to undertake the relevant work.	As set out in the Statement of Reasons **[APP-019]**, the compulsory acquisition powers sought

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Paragraph 2.6.3 Paragraph 2.6.5	As last resort, where it does not succeed in reaching the agreement that it requires, the network company may, as part of its application to the Secretary of State, seek to acquire rights compulsorily over the land in question by means of a provision in the DCO. The applicant may also seek the compulsory acquisition of land. This will not normally be necessary where lines and cables are installed but may be sought where other forms of electricity networks infrastructure (such as new substations) are required.	in the draft DCO are proportionate and no more than is reasonably necessary. All reasonable alternatives to compulsory acquisition have been explored. Given the national and local need for the Scheme and the support in National Policy Statements, compulsory acquisition of the land and rights and the temporary use of land is justified.
Paragraph 2.7.1	EN-1 explains in Section 4.10 that the Planning Act 2008 aims to create a holistic planning regime, such that the cumulative effects of the same project can be considered together. Co-ordinated applications typically bring economic efficiencies and reduced environmental impact.	The Scheme's full description of development is set out in Chapter 4: Scheme Description of the ES **[REP1-031]**. The ES **[APP-037-APP-544]** has analysed the Scheme, considering the effects from the development, including cumulative impacts.
Paragraph 2.9.9	New substations, sealing and 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.	ES Chapter 8: Landscape and Visual Impact **[APP-045]** has been provided as part of this submission. ES Chapter 8: Landscape and Visual Impact **[APP-045]** has informed the iterative design process, including taking account of published landscape character assessment guidance and fieldwork analysis. The overall objective of the landscape design is to integrate the Scheme into its landscape

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		setting and avoid or minimise adverse landscape and visual effects as far as practicable. The design has been developed in collaboration with the wider design team, other specialists and the Host Authorities' landscape advisors to achieve a solution that achieves this objective whilst maximising opportunities to deliver net gains in biodiversity gain. Accordingly, the landscape design aims to achieve the following: • To integrate the Scheme, including substations, into the existing landscape pattern as far as possible by retaining and following existing features, including vegetation, where practicable. • To replace vegetation lost because of construction of the Scheme through areas of new planting. • To filter and screen more prominent components of the Scheme, including substations, in views from visual receptors. Details of the landscape measures embedded into the Scheme design, including a summary of their environmental functions is presented in the OLEMP **[REP1-137]**.

Table 3: National Policy Statement EN-5 (November 2023)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Paragraph 2.9.37 Paragraph 2.9.38 Paragraph 2.9.39	Audible noise effects can also arise from substation equipment such as transformers, quadrature boosters and mechanically switched capacitors. 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 engineering intentionally or provided by other structures). For the assessment of noise from substations, standard methods of assessment and interpretation using the principles of the relevant British Standards are satisfactory.	Chapter 14: Noise and Vibration of the ES **[APP-051]** assesses the construction, operation and decommissioning of the Scheme in relation to noise. It concludes that there are no significant effects arising from noise generating equipment during the construction, operation and decommissioning phases. The Scheme submission is also supported by an OCEMP **[REP1-131]**, OOEMP **[EX4/GH7.2_B]** and ODS **[REP1-135]**, which set out mitigation measures to reduce noise effects during each phase of the Scheme**.**

2.4 National Policy Statement EN-1

Table 4: National Policy Statement EN-1 (December 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Paragraph 2.1.2	To produce the energy required for the UK and ensure it can be transported to where it is needed, a significant amount of infrastructure is needed at both local and national scale. High quality infrastructure is crucial for economic growth, boosting productivity and competitiveness.	As explained in the Statement of Need (SoN) **[APP-556]** and summarised in Sections 4 and 6 of the Planning Statement **[EX4/GH7.15_B]**, the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-

Table 4: National Policy Statement EN-1 (December 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	Part 3 of this NPS provides further details on the need for and importance of energy to economic prosperity and social well-being.	carbon electricity to help meet the UK's urgent need to develop a secure, affordable and low carbon-electricity generation system which is sufficient to meet future demand. This will help to meet the need for new energy structure that is crucial for economic growth, boosting productivity and competitiveness, as identified by this policy. The Scheme will quickly deliver significant amounts of low carbon power. Solar is also relatively quick to construct compared to other technologies which have longer construction timeframes or have potentially not yet been proven at scale.
Paragraph 2.2.3 Paragraph 2.2.4	In June 2019, the UK became the first major economy to legislate for a 2050 net zero Greenhouse Gases ('GHG') emissions target through the Climate Change Act 2008 (2050 Target Amendment) Order 2019. In December 2020, the UK communicated its Nationally Determined Contributions to reduce GHG emissions by at least 68 per cent from 1990 levels by 2030. In April 2021, the Government legislated for the sixth carbon budget (CB6), which requires the UK to reduce GHG emissions by 78% by 2035 compared to 1990 levels.	Chapter 7 Climate Change of the ES **[APP-044]** presents a lifecycle greenhouse gas (GHG) impact assessment which considers the lifetime emissions and effects of the Scheme. This concludes that over its 60-year operational lifetime the Scheme will produce 37.12TWh or 34.35TWh of electricity with an average operational greenhouse gas intensity of 0.034 to 0.037 grammes of carbon dioxide equivalent per kWh (gCo2e/kWh). This demonstrates its very low carbon attributes compared with the average emissions from the grid and other non-renewable forms of electricity generation,

Table 4: National Policy Statement EN-1 (December 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		providing an overall beneficial impact in relation to the UK meeting its carbon reduction targets and therefore represents a major beneficial effect on the climate.
Paragraph 2.3.1 Paragraph 2.3.3	Making Britain a Clean Energy Superpower is one of the five missions set out by the UK government. The Clean Power 2030 Action Plan sets out the government's first major steps towards delivering our Clean Power 2030 Mission in Partnership with the Scottish and Welsh governments, industry and the public. Our objectives for meeting the Clean Power 2030 Mission are to ensure our supply of energy always remains secure, reliable, affordable, and consistent with meeting our target to cut GHG emissions to net zero by 2050. This includes through delivery of our carbon budgets and Nationally Determined Contribution.	As explained in the SoN **[APP-556]** and summarised in Sections 4 and 6 of the Planning Statement **[EX4/GH7.15_B]**, the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change, including the legally binding emissions reduction target for 2050 and carbon budgets described by this policy. The Scheme incorporates Battery Energy Storage System (BESS) which is an important aspect of regularising the supply of electricity from renewable energy production such as solar PV.
Paragraph 2.3.4	Meeting the Clean Power 2030 Mission objectives necessitates a significant investment in energy infrastructure, both large nationally significant developments and smaller-scale developments determined at a local level. This requirement for new energy infrastructure will present	As explained in the SoN **[APP-556]** and summarised in Sections 4 and 6 of the Planning Statement **[EX4/GH7.15_B]**, the Scheme is a substantial infrastructure asset, capable of

Table 4: National Policy Statement EN-1 (December 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	opportunities for the UK and contributes towards the creation of secure, will paid jobs in the UK's clean energy industry and building domestic supply chains.	delivering large amounts of low-carbon electricity, in direct accordance with this policy, to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change.
Paragraph 2.3.5 Paragraph 2.3.6	As set out in the Clean Power Action Plan, this will be driver through rapid deployment of low carbon generation, flexibility infrastructure, and electricity transmission infrastructure. The Action Plan sets out targets for the 2030 capacities of key technologies at a national and regional level. Securing affordable, homegrown and abundant renewable resources, means we will be able to run our power system for increasing periods on clean, low carbon generation, with renewables providing the vast majority of generation, and nuclear continuing to deliver a backbone of vital low carbon power. A clean power system will enable further electrification of demand sectors and therefore increased emissions reduction.	As explained in the SoN **[APP-556]**, the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low carbon electricity, in direct accordance with this policy, to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change.
Paragraph 2.3.7	Reducing emissions in large parts of transport, heating and industry could lead to more than half of total energy demand being met by clean electricity in 2050, up from 17 per cent in 2019, representing a doubling in demand for electricity.	As explained in the SoN **[APP-556]** and summarised in Sections 4 and 6 of the Planning Statement **[EX4/GH7.15_B]**, the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the

Table 4: National Policy Statement EN-1 (December 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		government's objectives in respect of carbon reduction and climate change, including the legally binding emissions reduction target for 2050 and carbon budgets described by this policy. The Statement of Need **[APP-556]** also explains that solar generation is expected to be an important part of the future energy mix.
Paragraph 2.4.1	Given the vital role of energy to economic prosperity and social wellbeing, it is important that our supplies of energy remain secure, reliable and affordable.	The SoN **[APP-556]** set out the need for decarbonisation in order to support the government's ambitious plans to achieve net zero by 2050. There is also need to enable the country has accessible to safe, reliable and affordable energy to reduce the reliance of imported energy such as gas and reduce greenhouse gas. Solar energy such that that which would be provided by the Scheme would make a significant contribution towards securing low carbon solar energy provision which is urgently need in the UK. Solar energy such as that proposed is a reliable source of energy in the UK which is capable of rapid rollout once consented and provides the cheapest form of electricity generation. The Scheme will as part of other similar Schemes help towards providing a reliable and affordable supply of electricity which will mean affordable bills for households and businesses.

Table 4: National Policy Statement EN-1 (December 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Paragraph 3.1.1 Paragraph 3.1.2	This part of the NPS explains why the government sees a need for significant amounts of new large-scale energy infrastructure to meet its energy objectives and why the government considers that the need for such infrastructure is urgent. However, it will not be possible to develop the necessary amounts of such infrastructure without some significant residual adverse impacts. These effects will be minimised by the application of policy set out in Parts 4 and 5 of this NPS. See also Part 2 of each technology specific NPS.	As explained in the SoN **[APP-556]** and summarised in Sections 4 and 6 of the Planning Statement **[EX4/GH7.15_B]**, the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change. An EIA has been undertaken to assess the environmental impacts of the Scheme and an ES **[APP-037 to APP-544]** prepared to report the findings. Overall, with appropriate mitigation implemented, this identifies the residual significant adverse effects of the Scheme. When considered relative to the large-scale nature of the Scheme, these effects are considered to be outweighed by the significant national benefits that the Scheme will provide much needed large-scale renewable energy generation. Section 6 of the Planning Statement **[EX4/GH7.15_B]** sets out the detailed consideration of the Scheme's compliance with policy, taking account of the significant effects identified in the ES **[APP-037 to APP-544]** and Section 7 of the Planning Statement

Table 4: National Policy Statement EN-1 (December 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		[EX4/GH7.15_B] considers the planning balance, taking account of its benefits and effects.
Paragraph 3.2.1	The government's objectives for the energy system are to decarbonise power generation to meet the Clean Power 2030 Mission, ensuring our supply of energy always remains secure, reliable, affordable, and consistent with net zero emissions in 2050 for a wide range of future scenarios, including delivery of our carbon budgets and National Determined Contributions.	As explained in the SoN **[APP-556]** the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity, in direct accordance with this policy, to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change.
Paragraph 3.2.4	It is not the role of the planning system to deliver specific amounts or time limit any form of infrastructure covered by this NPS, it is for industry to prose new energy infrastructure projects that they assess to be viable within the strategic framework set by government. This is the nature of a market-based energy system. With the exception of new coal or large-scale oil fire electricity generation, the government does not consider it appropriate for planning policy to set limits on different technologies but	As per this policy, the Applicant proposes the Scheme by way of a DCO application.

Table 4: National Policy Statement EN-1 (December 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	planning policy can be used to support the government's ambitions in energy policy and other policy areas.	
Paragraph 3.2.6	It is not the government's intention in presenting any of the figures or targets in this NPS to propose limits on any new electricity that can be consented in accordance with energy NPSs. A large number of consented projects can help deliver an affordable electricity system, by driving competition and reducing costs within and amongst different technology and infrastructure types. Consenting new projects also enables projects utilising more advanced technology and greater efficiency to come forward. The delivery of an affordable energy system does not always mean picking the least cost technologies. A diversity of supply can aid in ensuring affordability and security for the system overall and relative costs can change over time, particularly for new and emerging technologies. It is not the role of the planning system to compare the costs of individual developments or technology types.	As explained in the SoN **[APP-556]**, the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change. This Paragraph further emphasises the scale of the urgent need and establishes that the fact there may be other similar schemes in the planning system is not a reason to limit the number of approvals. A large number of approved schemes is beneficial in terms of enabling the market to efficiently deliver the infrastructure that is needed.
Paragraph 3.2.8	The Secretary of State should assess all applications for development consent for the types of infrastructure covered by the energy NPS on the basis that the government has demonstrated that there is a need for those types of infrastructure, which is urgent, as described for each of them in this Part.	As explained in the SoN **[APP-556]** and summarised in Sections 4 and 6 of the Planning Statement **[EX4/GH7.15_B]**, the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low carbon electricity to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet

Table 4: National Policy Statement EN-1 (December 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change. The Applicant notes that, in accordance with this policy, the need infrastructure such as the Scheme, is acknowledged, and the application should be considered on the basis that the need has been demonstrated.
Paragraph 3.2.9	In addition, the Secretary of State has determined that substantial weight should be given to this need when considering applications for development consent under the Planning Act 2008.	As explained in the SoN **[APP-556]** and summarised in Sections 4 and 6 of the Planning Statement **[EX4/GH7.15_B]**, the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low carbon electricity to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change. As per this policy, the established urgent need for the Scheme should be given substantial weight in the decision. The Applicant notes that, in accordance with this policy, the need for infrastructure, such as the Scheme, is urgent and considers that the

Table 4: National Policy Statement EN-1 (December 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		Secretary of State should give substantial weight to this in their decision.
Paragraph 3.3.3	To ensure that there is sufficient electricity to meet demand, new electricity infrastructure will have to be built to replace output from retiring plants and to ensure we can meet increased demand. Our analysis suggests that even with major improvements in overall energy efficiency, and increased flexibility in the energy system, demand for electricity is likely to increase significantly over the coming years and could more than double by 2050 as large parts of transport, heating and industry decarbonise by switching from fossil fuels to low carbon electricity. The Impact Assessment for CB6 shows an illustrative range of 465-515TWh in 2035 and 610-800TWh in 2050.	As explained in the SoN **[APP-556]** and summarised in Sections 4 and 6 of the Planning Statement **[EX4/GH7.15_B]** the Scheme will help meet the demand for energy which is expected to rise substantially in the future.
Paragraph 3.3.8	The government has considered alternatives to the need for new large-scale electricity infrastructure and concluded that these would be limited to reducing total demand for electricity through efficiency measures or through greater use of low carbon hydrogen in decarbonising the economy; reducing maximum demand consumer led flexibility; and increasing the contribution of decentralised and smaller-scale electricity infrastructure. In addition, there are alternative ways of decarbonising heating and transportation, which are being developed alongside electrification of these sectors.	The SoN **[APP-556]** provides detailed information on why large-scale solar is needed alongside other forms of generation. As per Paragraph 3.2.8 and 3.2.9, the Scheme should be considered on the basis that its need is established, and this established and urgent need should be given substantial weight in the decision.
Paragraph 3.3.10	The precise level of electricity demand during the transition to net zero is uncertain and could be affected by alternative means of decarbonising these sectors, such as the use of low carbon hydrogen, and the pace of that decarbonisation. However, it is prudent to plan on a conservative basis to ensure that there is a sufficient supply of electricity to meet	The SoN **[APP-556]** provides detailed information on future energy demand,how this has been identified and how the Scheme is well-suited to help meet this demand.

Table 4: National Policy Statement EN-1 (December 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	demand across a wide range of future scenarios, including where the use of hydrogen is limited.	As per Paragraph 3.2.8 and 3.2.9, the Scheme should be considered on the basis that its need is established, and this established and urgent need should be given substantial weight in the decision.
Paragraph 3.3.12	Decentralised and community energy systems, including but not limited to as micro-generation contribute to our targets on reducing carbon emissions and increasing energy security. These technologies could also lead to some reduction in demand on the main generation and transmission system. However, the government does not believe they will replace the need for new large-scale electricity infrastructure to meet our energy objectives. This is because connection of a large-scale electricity generating facilities via a high voltage transmission system enables the pooling of both generation and demand, which in turn offers a number of economic and other benefits, such as more efficient bulk transfer of power and enabling surplus generation capacity in one area to be used to cover shortfalls elsewhere.	As explained in the SoN **[APP-556]**, this policy acknowledges that large-scale electricity generation facilities are needed and are complementary to decentralised and community energy systems. The Scheme would connect directly to the NETS; to enable the transfer of the electricity it generates over a wide geographical area, as per this policy. As per Paragraph 3.2.8 and 3.2.9, the Scheme should be considered on the basis that its need is established, and this established and urgent need should be given substantial weight in the decision.
Paragraph 3.3.23	Wind and solar and the lowest cost ways of generating electricity, helping reduce costs and providing a clean and secure source of electricity supply (as they are not reliant on fuel for generation). Our analysis shows that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar.	As explained in the SoN **[APP-556]**, the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable and low carbon electricity generation system, which is sufficient to meet future demand.

Table 4: National Policy Statement EN-1 (December 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		This policy sets out that the government expects solar technology to play a major role in delivery of these objectives. The Scheme is in direct accordance with this expectation.
Paragraph 3.3.25	Storage has a key role to play in meeting the Clean Power 2030 Mission, achieving net zero and providing flexibility to the energy system reducing the amount of generation and associated network that needs to be built to meet peak demand, helping Britain reach clean power in a cost effective way and reducing delivery risk associated with other types of energy infrastructure.	This Paragraph explains the need for energy storage systems to complement generation. In accordance with this need, the Scheme includes a Battery Energy Storage System (BESS) to control the release of energy to the NETS, enabling it to be released when it is most needed.
Paragraph 3.3.26 Paragraph 3.3.27	Storage is needed to reduce the costs of the electricity system and increase reliability by storing surplus electricity in times of low demand to provide electricity when demand is higher. Storage can provide various services, locally and at the national level. These include maximising the usable output from intermittent low carbon generation (e.g. solar and wind), reducing the total amount of generation capacity needed on the system; providing a range of balancing services to NESO and Distribution Network Operators (DNOs) to help operate the system; and reducing constraints on the networks, helping to defer or avoid the need for costly network upgrades as demand increases.	This Paragraph explains the need for energy storage systems to complement generation. In accordance with this need, the Scheme includes a Battery Energy Storage System (BESS) to control the release of energy to the NETS, enabling it to be released when it is most needed.
Paragraph 3.3.58	Given the urgent need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation, there is an urgent need for new (and particularly low carbon) electricity	As explained in the SoN **[APP-556]**, the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	NSIPS to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy.	need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change. As per Paragraph 3.2.8 and 3.2.9, the Scheme should be considered on the basis that its need is established, and this established and urgent need should be given substantial weight in the decision.
Paragraph 3.3.59	All the generating technologies mentioned above are urgently needed to meet the government's energy objectives by: • Providing security of supply (by reducing reliance on imported oil and gas, avoiding concentration risk and not relying on one fuel or generation type). • Providing an affordable, reliable system (through the deployment of technologies with complementary characteristics). • Ensuring the system is net zero consistent (by remaining in line with our carbon budgets and maintaining the options required to deliver for a wide range of demand, decarbonisation and technology scenarios, including where there are difficulties with delivery any technology.	As explained in the SoN **[APP-556]**, the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change. As per Paragraph 3.2.8 and 3.2.9, the Scheme should be considered on the basis that its need is established, and this established and urgent need should be given substantial weight in the decision.

Table 4: National Policy Statement EN-1 (December 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Paragraph 3.3.60 Paragraph 3.3.61	Known generation technologies that are included within the scope of this NPS (and would be classed as an NSIP if above the relevant capacity thresholds set out under the Planning Act 2008) include: • Offshore Wind (including floating wind). • Onshore Wind. • Solar PV. • Wave. • Tidal Range. • Tidal Stream. • Pumped Hydro. • Energy from Waste (including ACTs) with or without CCS. • Biomass with our without CCS. • Natural Gas with or without CCS. • Low carbon hydrogen. • Large scale nuclear, Small Modular Reactors, Advanced Modular Reactors and fusion power plants. • Geothermal.	This confirms that solar PV generation facilities, such as the Scheme, are covered by the adopted suite of Energy NPSs. As explained in the SoN **[APP-556]**, the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable electricity generation system which is sufficient to meet future demand and contribute to meeting the government's objectives in respect of carbon reduction and climate change. As per Paragraph 3.3.8 and 3.2.9, the Scheme should be considered on the basis that its need is established, and this established and urgent need should be given substantial weight in the decision.

Table 4: National Policy Statement EN-1 (December 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	The need for all these types of infrastructure is established by this NPS and a combination of many or all of them is urgently required for the Clean Power 2030 Mission, energy security and Net Zero, as set out above.	
Paragraph 3.3.85	Given the urgent need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation, there is an urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonise its economy.	As explained in the SoN **[APP-556]**, solar generation is a proven technology that can be delivered quickly in comparison to other forms of generation technology. The Scheme, therefore, has great potential to deliver a substantial amount of low-carbon electricity in a short timescale from construction to operation. This Paragraph further emphasises the substantial benefits of the Scheme in making a substantial contribution to meeting the UK's urgent energy needs.
Paragraph 4.1.5	In considering any proposed development, in particular when weighing its adverse impacts against its benefits, the Secretary of State should take into account: • Its potential benefits including its contribution to meeting the need for 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.	As considered within Section 6 of the Planning Statement **[EX4/GH7.15_B]**, the benefits and adverse effects have been assessed and duly weighted. Where adverse effects have emerged through the ES **[APP-037 to APP-544]** mitigation measures, both embedded and additional, have been incorporated into the Scheme and its design.

Table 4: National Policy Statement EN-1 (December 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Paragraph 4.3.1 Paragraph 4.3.2 Paragraph 4.3.3	All proposals for projects that are subject to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) must be accompanied by an Environmental Statement (ES) describing the aspects of the environment likely to be significantly affected by the project. The EIA Regulations specifically refer to effects on population, human health. Biodiversity, land, soil, water, air, climate, the landscape, material assets and historic environment, and the interaction between them. The EIA Regulations require an assessment of the likely significant effects of the proposed project on the environment, covering the direct effects and any indirect, secondary, cumulative, transboundary, short, medium, and long term, permanent and temporary, positive and negative effects at all stages of the project, and also the measures envisaged for avoiding or mitigating significant adverse effects.	The DCO Application encompasses an ES **[APP-037 to APP-544]**, which constitutes a total of 27 Chapters, which assess likely significant effects, direct and indirect effects, secondary, cumulative, transboundary, short, medium, long-term, permanent and temporary, positive and negative effects at all stages of the project and also proposes mitigation measures where necessary to avoid significant adverse effects.
Paragraph 4.3.5 Paragraph 4.3.7	For the purposes of this NPS and the technology specific NPSs, the ES should cover the environmental, social and economic effects arising from pre-construction, construction, operation and decommissioning of the project. In the absence of any additional information on additional assessments, the principles set out in this Section will apply to all assessments.	The ES **[APP-037 to APP-544]** has been produced in accordance with these Paragraphs.
Paragraph 4.3.11	In some instances, it may not be possible at the time of the application for development consent for all aspects of the proposal to have been settled in precise detail. Where this is the case, the applicant should explain in its application which elements of the proposal have yet to be finalised, and the reasons as to why this is the case.	Where it has not been possible, the DCO has produced draft and outline documents, such as the Outline Decommissioning Statement (ODS) **[REP1-135]** and the Outline Construction

Table 4: National Policy Statement EN-1 (December 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		Environmental Management Plan (OCEMP) **[REP1-131]**. Where these documents have been produced in a draft form, documents point towards the production of succeeding detailed statements and management plans.
Paragraph 4.3.12	Where some details are still to be finalised, the ES should, to the best of the applicant's knowledge, assess the likely worst case environmental, social and economic effects of the proposed development to ensure that the impacts of the project as it may be constructed have been properly assessed.	Where details are yet to be finalised (such as the location of ancillary equipment) a worst-case analysis has been conducted to reflect the maximum design parameters across the Site(s).
Paragraph 4.3.22 Paragraph 4.3.23	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. • Only alternatives that can meet the objectives of the proposed development need be considered. The Secretary of State should be guided in considering alternative proposals by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security, climate change, and other environmental benefits) in the same timescale as the proposed development.	Section 6.3 of the Planning Statement **[EX4/GH7.15_B]** sets out the consideration of the Scheme in the context of relevant policy that is applicable to alternatives. This sets out how the Scheme accords with policies and legislation where consideration of alternatives may be relevant. In doing so, it notes the requirements of this policy, including that consideration of alternatives should be proportionate, take account of an alternative's ability to deliver the same infrastructure capacity as the Scheme, and that Development Consent should not be rejected on one site simply because fewer adverse impacts would result

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Paragraph 4.3.24 Paragraph 4.3.25 Paragraph 4.3.26 Paragraph 4.3.27 Paragraph 4.3.28	The Secretary of State should not refuse an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site, and it should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals. Alternatives not among the main alternatives studied by the applicant (as reflected in the ES) should only be considered to the extent that the Secretary of State thinks they are both important and relevant to the decision. As the Secretary of State must assess an application in accordance with the relevant NPS (subject to the exceptions set out in the Planning Act 2008), if the Secretary of State concludes that a decision to grant consent to a hypothetical alternative proposal would not be in accordance with the policies set out in the relevant NPS, the existence of that alternative is unlikely to be important and relevant to the Secretary of State's decision. Alternative proposals which mean the necessary development could not proceed, for example, because the alternative proposals are not commercially viable or alternative proposals for sites would not be physically suitable, can be excluded on the grounds that they are not important and relevant to the Secretary of State's decision. Alternative proposals which are vague or immature can be excluded on the grounds that they are not important and relevant to the Secretary of State's decision. It is intended that potential alternatives to a proposed development should, wherever possible, be identified before an application is made to the	from developing similar infrastructure on another suitable site. Consideration of Alternatives and Design evolution is also addressed within ES Chapter 5 **[APP-042]** and the Site Selection Report **[REP1-037]** in accordance with the requirements set out in these paragraphs of EN-1.

Table 4: National Policy Statement EN-1 (December 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Paragraph 4.3.29	Secretary of State (so as to 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 their 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.	
Paragraph 4.4.7 Paragraph 4.4.8	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 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. However, not all potential sources of health impacts will be mitigated in this way and the Secretary of State may want to take account of health concerns when setting requirements relating to a range of impacts, such as noise.	The cumulative effects of the Scheme have been assessed across numerous ES Chapters but primarily set out and summarised in ES Chapter 18: Human Health **[APP-055]**. Chapter 18 has assessed the cumulative residents effects on human health from the Scheme across the construction, operational and decommissioning phases. Table 18.13 in ES Chapter 18: Human Health **[APP-055]**. sets out the main receptors and likely impacts, the mitigation measures and the residual and cumulative effects across each phase. A summary of cumulative effects is also listed within ES Chapter 25: Cumulative Effects **[APP-062]** of the ES. Other ES Chapters that consider the impacts on human health include: • Chapter 7: Climate Change **[APP-044]**

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		• Chapter 8: Landscape and Visual Impact Assessment **[APP-045]** • Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]** • Chapter 13: Transport and Access **[REP2-003]** • Chapter 14: Noise and Vibration **[APP-051]** • Chapter 16: Air Quality **[APP-053]** • Chapter 17: Socio-Economics, Tourism and Recreation **[APP-054]** • Chapter 21: Electromagnetic Fields **[APP-058]** • Chapter 22: Ground Conditions and Contamination **[REP1-025]** • Chapter 23.Major Accidents and Disasters **[APP-060]** In terms of the construction phase, the cumulative requirement for primary health services during the cumulative construction phase is anticipated to experience a substantial uplift as a result of inbound temporary construction workers. However, due to the

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		geographic spread of identified cumulative developments, the concentration of additional healthcare service need within the 5 km ZOI of the Scheme for primary healthcare provision is not anticipated to be of a greater level of significance (a medium-term **minor adverse effect**) than the Scheme as assessed in isolation. This is therefore not a significant effect. ES Chapter 18: Human Health **[APP-055]** confirms that the Scheme includes embedded mitigation measures to reduce its impact. It also includes additional mitigation measures, particularly during the construction phase to reduce the impact on Oakfield Easton Maudit (offsetting from the facility within 100m) and primary healthcare services within the local area (directing workers to find and register GPs in a reasonable proximity to their accommodation, where these surgeries have reasonable capacity to take on additional patients. In terms of the cumulative effects from the operational phase of the Scheme, it is anticipated to have some level of beneficial impact on wider societal infrastructure through the provision of new play spaces, utilities, retail, and healthcare infrastructure associated with

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		large-scale residential developments. Although these pieces of infrastructure are much more likely to benefit residents in these new-build areas rather than in existing communities, the overall impact in the 2 km ZOI for human health is anticipated to be positive even if no more than low in magnitude. This is therefore likely to induce a cumulative long-term **minor beneficial effect**, which is the same significance as for the Scheme assessed in isolation. In terms of the cumulative effects from the decommissioning phase of the Scheme, it is anticipated to bring some level of employment and income uplift to the future working population, with the identified cumulative developments (where in employment uses) anticipated to maintain a steady number of jobs and economic performance. That notwithstanding, the level of cumulative effect on human health during the decommissioning period is not anticipated to be substantial greater than assessed for the Scheme in isolation, largely due to the level of uncertainty in future working and employment market conditions. It is therefore considered that the Scheme is compliant with this policy.

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Paragraph 4.6.1 Paragraph 4.6.2	Environmental net gain is an approach to development that aims to leave the natural environment in a measurably better state than beforehand. Projects should therefore not only avoid, mitigate and compensate harms, following mitigation hierarchy, but also consider whether there are opportunities for enhancements. Biodiversity net gain is an essential component of environmental net gain. Projects should consider and seek to incorporate improvements in natural capital, ecosystem services and the benefits they deliver when planning how to deliver biodiversity net gain.	A Biodiversity Net Gain (BNG) Assessment, using Defra's Metric 4.0 has been provided within the DCO application **[REP1-043]**. This sets out the significant net gains in biodiversity that the Scheme will provide. The Scheme has taken advantage of opportunities to conserve and enhance biodiversity and accords with this policy. The Scheme has therefore incorporated improvements in biodiversity and accords with this policy. See also Section 6.7 of the Planning Statement **[EX4/GH7.15_B]** for further detail on the biodiversity measures incorporated and compliance with planning policy.
Paragraph 4.6.6 Paragraph 4.6.7 Paragraph 4.6.10	Energy NSIP Proposals, whether onshore or offshore should seek opportunities to contribute to and enhance the natural environment by providing net gains for biodiversity, or the wider environment where possible. In England applicants for onshore elements of any development are encouraged to use the most current version of the Defra biodiversity metric to calculate their biodiversity baseline and present planned biodiversity net gain outcome. This calculation data should be present in full as part of their application.	A Biodiversity Net Gain (BNG) Assessment, using Defra's Metric 4.0, has been provided with the DCO application **[REP1-043]**. This sets out the significant net gains in biodiversity that the Scheme will provide. The Scheme has therefore incorporated improvements in biodiversity and accords with this policy. See also Section 6.7 of the Planning Statement **[EX4/GH7.15_B]** for further detail on the biodiversity measures incorporated and compliance with planning policy.

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	Biodiversity net gain should be applied in conjunction with the mitigation hierarchy and does not change or replace existing environmental obligations.	
Paragraph 4.6.13	In addition to delivering biodiversity net gain, developments may also deliver wider environmental gains and benefits to communities relevant to the local area, and to national policy priorities, such as: • Reductions in GHG emissions; • Reduced flood risk, • Improvements to air, water or soil quality, • Climate adaption, • Landscape enhancement, • Increased access to natural greenspace, and/or • The enhancement, expansion or provision of trees and woodlands.	The Scheme will deliver a substantial reduction in greenhouse gas emissions over its lifetime and a beneficial effect as explained by Chapter 7: Climate Change of the ES **[APP-044]**. The Scheme is estimated to produce low carbon energy at 0.034 to 0.037 gCO2e/kWh. The Scheme has taken other opportunities to provide enhancements, including by providing and connecting green infrastructure (as set out by the Outline Landscape Environmental Management Plan - OLEMP) **[REP1-137]**.
Paragraph 4.6.15	Applications for development consent should be accompanied by a statement demonstrating how opportunities for delivering wider environmental net gains have been considered and where appropriate, incorporated into proposals as part of good design (including any relevant operational aspects) of the project.	
Paragraph 4.6.16	Applicants should make use of available guidance and tools for measuring natural capital assets and ecosystem services, such as the Natural Capitals Committee's 'How to Do it: natural capital workbook', the	

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	government guidance on Enabling a Natural Capital Approach (ENCA), and other tools that aim to enable wider benefits for people and nature.	
Paragraph 4.6.17	Where environmental net gain considerations have featured as part of the strategic options appraisal process to select a project, the statement should reference that information to supplement the site specific details.	
Paragraph 4.7.3	Good design is also a means by which many policy objectives in the NPS can be met, for example the impact sections show how good design, in terms of siting and the use of appropriate technologies, can help mitigate adverse impacts, such as noise. Projects should look to use modern methods of construction and sustainable design practices such as use of sustainable timber and low carbon concrete. Where possible, projects should include the reuse of material.	As detailed in Section 6.3 of the Planning Statement **[EX4/GH7.15_B]**, the Scheme has been subject to a detailed and sensitive iterative design process. This has taken account of the context and features of the land within the Order limits, nearby sensitive receptors and assets, information emerging from environmental surveys, feedback from stakeholders, and opportunities and constraints in order to develop a good design that balances the need maximise the energy generation capacity of the Scheme, with the avoidance and mitigation of impacts, and provision of environmental and other enhancements, where practicable. The design process and basis of design decisions take are described in the Chapter 5: Alternatives and Design Evolution of the ES **[APP-042]** and the Design Approach Document **[APP-560]**.
Paragraph 4.7.4	Given the benefits of good design in mitigating the adverse impacts of a project, applicants should consider how good design can be applied to a project during the early stages of the project lifecycle.	
Paragraph 4.7.7	Applicants must demonstrate in their application documents how the design process was conducted and how the proposed design evolved.	The Design Approach Document **[APP-560]** details the iterative process and how the

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Paragraph 4.7.12 Paragraph 4.7.13	Where a number of different designs were considered, applicants should set out the reasons why the favoured choice has been selected. 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. 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.	proposed Scheme design has evolved and developed. The Site Selection Assessment **[REP1-037]** details the stages and methodology used in the assessment for determining the site selection process. The wider impacts of the Scheme have been captured, detailed, assessed, and mitigated for (where possible) through the production of the ES **[APP-037 to APP-544]**. The design process has incorporated operational, safety and security requirements as well as environmental impacts as assessed in the ES.
Paragraph 4.10.5 Paragraph 4.10.7	In certain circumstances, measures implemented to ensure a scheme can adapt to climate change may give rise to additional impacts, for example as a result of protecting against flood risk, there may be consequential impacts on coastal change. In preparing measures to support climate change adaptation applicants should take reasonable steps to maximise the use of nature-based solutions alongside other conventional techniques. In 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.	Consideration has been given to incorporating nature-based climate change adaption into Scheme, and proposals for SuDS have been included, as set out in ES Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]**. As outlined within the Outline Operational Environmental Management Plan (OOEMP) **[EX4/GH7.2_B]** and the Landscape Ecological Mitigation Plans **[REP3-042, REP3-044, APP-209, REP3-046, APP-211, REP3-048, REP3-050, APP-214, APP-215, REP3-052, APP-217, REP3-054, APP-219].**

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		The Scheme shall also provide significant biodiversity enhance and biodiversity net gain. The details of such benefits and net gain are contained in Chapter 9 Ecology and Biodiversity **[REP1-033]**. The Chapter also assesses the cumulative effects from each phase and the embedded mitigation measures to minimise the impact of the Scheme. In general, no significant long-term adverse effects are anticipated, and the creation and enhancement of habitats such as hedgerows, grassland, and ponds are predicted to result in benefits for many species, including birds, bats, amphibians and invertebrates, among others.
Paragraph 4.10.8 Paragraph 4.10.9	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. 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	As outlined in ES Chapter 7: Climate Change **[APP-044]**, assesses the climate change resilience of the Scheme and demonstrates relevant mitigation measures in the design of the Scheme, its construction, operation and decommissioning. This includes: • The effect of projected temperature increases on electrical equipment over the course of the Scheme's design life has been taken into account. Inverters (PV and BESS) will have a cooling system installed to control the temperature and allow the

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	Risk Assessments, Climate Impacts Tool, and British Standards for climate change adaptation, in accordance with the EIA Regulations.	inverters to operate efficiently in warmer conditions. The PV modules and transformers have a wide range of acceptable operating temperatures, and it has been determined that increasing temperatures will not adversely affect their operation. • Any health and safety plans development for construction and decommissioning activities will be required to account for potential climate change impacts on workers, such as flooding and heatwaves. • The design of drainage systems will ensure that there will be no significant increases in flood risk downstream during storms up to and including the 1 in 100 (1%) annual probability design flood, with an allowance of 20% for climate change. A Decommissioning Environmental Management Plan (DEMP) (taking account of climate change risks at the time) will be prepared prior to decommissioning. An ODS **[REP1-135]** is provided as part of the Application. ES Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]** and Flood Risk

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		Assessments in ES Appendices 10.1 to 10.10 **[APP-098 to APP-107, REP1-053, REP1-055]** have considered the potential impacts of climate change.
Paragraph 4.10.10 Paragraph 4.10.11	Applicants should assess the impacts on and from their proposed energy project across a range of climate change scenarios, in line with appropriate exert advice and guidance available at the time. 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.	As outlined in Chapter 7: Climate Change of the ES **[APP-044]**, account of the effects of climate change have been taken in the design of the Scheme, and its construction and decommissioning. This includes climate resilience mitigation measures: • The effect of projected temperature increases on electrical equipment over the course of the Scheme's design life has been taken into account. Inverters (PV and BESS) will have a cooling system installed to control the temperature and allow the inverters to operate efficiently in warmer conditions. The PV modules and transformers have a wider range of acceptable operating temperatures, and it has been determined that increasing temperatures will not adversely affect their operation. • Any health and safety plans developed for construction and decommissioning activities will be required to account for potential

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		change impacts on workers, such as flooding and heatwaves. • The design of drainage systems will ensure that there will be no significant increases in flood risk downstream during storms up to and including the 1 in 100 (1%) annual probability design flood, with an allowance of 20% for climate change. A Decommissioning Environmental Management Plan (DEMP) (taking account of climate change risks at the time) will be prepared prior to decommissioning. An ODS **[REP1-135]** is provided as part of the Application. • Flood Risk Assessments (FRAs) are provided at Appendices **[APP-098 to APP-107, REP1-053, REP1-055]** of the ES. The FRA provides a detailed assessment of the risk of flooding to and from the Scheme (taking account of climate change) and concludes that the risk of flooding will not be increased as a result of construction, operation or decommissioning of the Scheme. It is therefore considered that the Scheme is compliant with this policy.

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		• Chapter 7: Climate Change of the ES **[APP-044]** presents a lifecycle greenhouse gas (GHG) impact assessment which considers the impact of GHG emissions arising over the lifetime of the Scheme on the climate. This concludes over its 60-year operational lifetime the Scheme will produce 37.12TWh or 34.35TWh of electricity with an average operational greenhouse gas intensity of 0.034 to 0.037 grammes of carbon dioxide equivalent per kWh (gCO2e/kWh). This demonstrates its very low carbon attributes compared with other non-renewable forms of electricity generation, providing an overall major beneficial impact in relation to the UK meeting its carbon reduction targets and therefore represents a major beneficial effect on the climate.
Paragraph 4.11.1 Paragraph 4.11.2 Paragraph 4.11.3	The connection of a proposed electricity generation plant to the electricity network is an important consideration for applicants wanting to construct or extend generation plant. In the market system and in the past, it has been for the applicant to ensure that there will be necessary infrastructure and capacity within an existing or planned transmission or distribution network to accommodate the electricity generated. To support the achievement of the transition to net zero, government is accelerating the co-ordination of the development of the grid network to	As captured within the Grid Connection Statement **[APP-557]**, the Applicant submitted a grid application to the National Grid Electricity System Operator Limited (NGESO), the system operator of NETS. An offer was then received for which the Applicant accepted. The Scheme is considered compliant with these Paragraphs.

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	facilitate the UK's net zero energy generation development and transmission.	
Paragraph 4.11.5 Paragraph 4.11.6	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. 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.	As captured within the Grid Connection Statement **[APP-557]**, the Applicant submitted a grid application to the National Grid Electricity System Operator Limited (NGESO), the system operator of NETS. An offer was then received for which the Applicant accepted. The Scheme is considered compliant with these Paragraphs.
Paragraph 4.12.1	Issues relating to discharges or emissions from a proposed project, and which lead to other direct or indirect impacts on terrestrial, freshwater, marine, onshore and offshore environments, or which include noise and vibration may be subject to separate regulation under the pollution control framework or other consenting or licensing regimes, for example local planning consent or marine licences (see paragraph 4.5.6 for more information).	Construction and Decommissioning Phases (as well as BESS failure) of the Scheme pose the greatest risk of potential discharges of emissions to freshwater sources. These potential effects have been recognised against separate regulation where applicable within the Outline Construction Environmental Management Plan (OCEMP) **[REP1-131]**, ODS **[REP1-135]** and the Outline Battery Storage Safety Management Plan **[REP1-143]**.
5.2 Air Quality and Emissions Applicant Assessment Paragraph 5.2.8	Where the project is likely to have adverse effects on air quality the applicant should undertake an assessment of the impacts of the proposed project as part of the ES.	Chapter 16: Air Quality of the ES **[APP-053]** 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

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		maintenance), and decommissioning stages of the Scheme on air quality. Mitigation measures have been proposed where required and are summarised in Sections 16.7 and 16.9 of the Chapter. This ES Chapter also 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. The implementation of mitigation measures identified within the OCEMP **[REP1-131],** the OOEMP **[EX4/GH7.2_B],** the ODS **[REP1-135],** and the Outline Construction Traffic Management Plan (OCTMP) **[REP3-064]** is assessed as preventing any significant impacts on human health from occurring. Residual effects are therefore assessed as being not significant.
Paragraph 5.2.17	The Secretary of State should give air quality considerations substantial weight where a project is proposed near a sensitive receptor site, such as an education or healthcare facility, residential use or a sensitive or protected habitat.	ES Chapter 16: Air Quality **[APP-053]** sets out mitigation measures, which are secured in Construction, through the OCEMP **[REP1-131]**, Operation, through the OOEMP **[EX4/GH7.2_B]** and Decommissioning through the ODS **[REP1-135]** They include information on how to

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Paragraph 5.2.18 Paragraph 5.2.19	Where a project is proposed near to a sensitive receptor site of air quality, if the applicant cannot provide justification for this location, and a suitable mitigation plan, the Secretary of State should refuse consent. In all cases, the Secretary of State must take account of any relevant statutory air quality limits, objectives and targets. If a project will leave to noncompliance with a statutory limit, objective or target the Secretary of State should refuse consent.	minimise dust emissions from the Scheme which may be impactful upon the air quality. With the embedded mitigation measures contained in the above documents and outlined in Chapter 16: Air Quality of the ES **[APP-053]** demonstrate that the construction, operation and decommissioning of the Scheme will not have a significant effect on air quality. The residual effects of dust and particulate matter emissions during construction and decommissioning and the road traffic exhaust emissions during construction, operation and decommissioning on human receptors and LWSs following the implementation of additional mitigation measures are considered to be not significant. Therefore, the Scheme would not lead to non compliance with any statutory air quality limit, objective or target.
5.3 Greenhouse Gas Emission Paragraph 5.3.4	All proposals for energy infrastructure projects should include a GHG assessment as part of their ES (See Section 4.3). This should include: • A whole life GHG assessment showing construction, operational and decommissioning GHG impacts, including impacts from change of land use.	Chapter 7: Climate Change of the ES **[APP-044]** presents a lifecycle greenhouse gas (GHG) impact assessment, which considers the impact of GHG emissions arising over the lifetime of the Scheme on the climate. ES Chapter 7: Climate Change **[APP-044]** presents a greenhouse gas (GHG) assessment

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	• 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 priroritised 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 internal efforts to limit climate change, both alone and where relevant in combination with other developments at a regional or national level, or sector level, if sectoral targets are developed.	over the lifetime of the Scheme. It concludes that renewable energy generation from the Scheme during the first year of operation is estimated to be around 670,000 MWh/year if tracker panels are used andaround 620,000 MWh/year if fixed panels are implemented. This will reduce gradually through degradation to 576,000 MWh and in the final year reduce to 533,107 MWH. The total energy generation from the proposed 60-year operational life is approximately 34.35TWh. Accounting for the estimated construction phase and operation phase emissions, the Scheme's total carbon intensity value is 43.90 – 47.44 gCO_2e/kWh (for trackers panels and fixed panels respectively). The GHG impact during construction, operation and decommissioning is assessed as having a significant beneficial effect as it will contribute to achieving the rate of transition required by nationally set policy commitments and supporting the trajectory towards net zero. The OCEMP **[REP1-131]** and the OOEMP **[EX4/GH7.2_B]** set out measures to control and drive down carbon emissions during construction and operation of the Scheme. Measures have been taken to drive down the climate change at the construction, operation

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		and decommissioning. Embedded Mitigations include: - Any vegetation cleared for the Scheme will be compensated by a planting scheme that equals or exceeds the current levels of vegetation; and - Lean design to minimise use of concrete, steel, aggregates, etc.
5.4 Biodiversity and Geological Conservation Paragraph 5.4.4 Paragraph 5.4.5	The highest level of biodiversity protection is afforded to sites identified through international conventions. The Habitats Regulations set out sites for which an HRA will assess the implications of a plan or project, including Special Areas of Conservation and Special Protection Areas. As a matter of policy, the following should be given the same protection as sites covered by the Habitats Regulations and an HRA will also be required: • Potential Special Projection Areas and possible Special Areas of Conservation; • Listed or proposed Ramsar sites; and • Sites identified, or required, as compensatory measures for adverse effects on Special Protection Areas, Special Areas of Conservation, and any of the other sites covered by this paragraph.	A Habitat Regulations Assessment **[REP1-153]** has been prepared, which confirms that the Scheme impact on any Special Areas of Conservation and Special Protection Areas.
Paragraph 5.4.8	Development on land within or outside a SSSI, and which is likely to have an adverse effect on it (either individually or in combination with other	The assessment in Section 9.9 of Chapter 9: Ecology and Biodiversity of the ES **[REP1-033]**

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	developments), should not normally be permitted. The only exception is where the benefits (including need) of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of SSSIs.	considers the impacts of the Scheme on designated sites and concludes that there are no significant effects as a result of operation of the Scheme on any SSSIs. The Scheme therefore accords with this policy.
Paragraph 5.4.13 Paragraph 5.4.14	Sites of regional and local biodiversity and geological interest, which include Regionally Important Geological Sites, Local Nature Reserves and Local Wildlife Sites, are areas of substantive nature conservation value and make an important contribution to ecological networks and nature's recovery. They can also provide wider benefits including public access (where agreed), climate mitigation and helping to tackle air pollution. National planning policy expects plans to identify and map Local Wildlife sites, and to include policies that not only secure their protection from harm or loss but also help to enhance them and their connection to wider ecological networks.	The assessment in Section 9.9 of Chapter 9: Ecology and Biodiversity of the ES **[REP1-033]** considers the likely significant impacts of the Scheme on designated sites and concludes that there are no significant effects as a result of the operation of the Scheme on any sites of regional and local biodiversity and geological interest. The Scheme, therefore, accords with this policy.
Paragraph 5.4.18 Paragraph 5.4.19	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. The applicant should provide environmental information proportionate to the infrastructure where EIA is not required to help the Secretary of State consider thoroughly the potential effects of a proposed project.	The ES has considered the effects on designated sites of ecological and geological conservation importance. This is captured within ES Chapter 9: Ecology and Biodiversity **[REP1-033]** and ES Chapter 22: Ground Conditions and Contamination **[REP1-025]**. Following the application of mitigation measures set out in Sections 9.8 of Chapter 9: Ecology and Biodiversity **[REP1-033]**, no significant adverse effects have been identified during the construction, operation or decommissioning of

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		the Scheme and no residual effects are anticipated. Any mitigation measures undertaken at the point of decommissioning aimed at maintaining ecological value of the Sites should take account of changes in ecological objectives that have occurred over the operational phase. The majority of in-combination effects likely to arise from the Scheme are considered to be beneficial. Key measures which are likely to result in beneficial in-combination effects on a number of ecological receptors include the following: • The cessation of intensive arable land-use and herbicide/fertiliser inputs associated with an arable system; • The reversion of arable land to permanent, species-rich grassland; • The retention, creation and enhancement of other ecologically valuable habitats across large parts of the Order Limits; and • Sensitive ongoing management of these habitats throughout the operational

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		phase, as prescribed and secured by the OLEMP **[REP1-137]**.
Paragraph 5.4.20 Paragraph 5.4.21 Paragraph 5.4.22	The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests. Applicants should consider wider ecosystem services and benefits on natural capital when designing enhancement measures. 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.	The Design Approach Document **[APP-560]** sets out the Design evolution and approach of the Scheme and how the extent of the Order Limits and the area proposed for the development has evolved and reduced over time to reduce impacts on biodiversity. It explains how opportunities to protect and enhance biodiversity have been incorporated into the Scheme. The Scheme has, therefore, taken advantage of opportunities to conserve and enhance biodiversity. Through incorporating improvements in biodiversity, the Scheme accords with this Policy. See also Section 6.7 of the Planning Statement **[EX4/GH7.15_B]** for further detail on the biodiversity measures incorporated and compliance with planning policy. Chapter 4: Alternatives and Design Evolution **[REP1-031]** and Chapter 9: Biodiversity of the ES **[REP1-033]** explains that the Scheme has been designed to avoid all sites statutorily designated for their biodiversity importance and to avoid or minimise impacts on sites that are non-statutorily designated for their biodiversity

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		importance. Measures embedded within the Scheme design will ensure that designated sites are not significantly adversely impacted during construction, operation or decommissioning, and are secured within the OCEMP **[REP1-131],** the OOEMP **[EX4/GH7.2_B],** the ODS **[REP1-135],** and the OCTMP **[REP3-064]** As set out in (OLEMP) **[REP1-137]**, the Scheme would provide extensive new tree and hedgerow planting and improvement of existing hedgerows by bolstering with a diversity of appropriate native species and 'gapping-up' where required. These will provide a valuable habitat, forming important wildlife corridors and reinforcing existing ones. The OLEMP **[REP1-137]** ensures the provision of barn owl nest boxes and a variety of other bird boxes and bat boxes to be installed on trees in key locations to improve nesting and roosting opportunities. The OLEMP **[REP1-137]** contains details of all ecological mitigation and enhancements A Biodiversity Net Gain (BNG) Assessment, using Defra's Metric 4.0, has been provided with the DCO application **[REP1-043]**. This sets out

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		the significant net gains in biodiversity that the Scheme will provide. The Scheme has, therefore, taken advantage of opportunities to conserve and enhance biodiversity and accords with this policy.
Paragraph 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.	The Scheme does not incorporate or propose the loss of any Ancient Woodlands or Veteran Trees as detailed in ES Chapter 19: Arboriculture **[APP-056].** ES Chapter 19: Arboriculture **[APP-056]** does note that during construction, crown lifting and root pruning may be required to facilitate the construction of an access track within Three Shires Wood at Green Hill G (Ancient Woodland) buffer zone. However, impacts are only anticipated if a) the base of the existing informal track in this location requires removal to install a new subbase, which may cause root damage to edge trees at Three Shires Wood and b) if the canopies of edge trees require pruning to provide clearance for construction traffic. However, mitigation measures, such as re-using existing track subbases wherever possible, hand digging and root pruning under supervision means that the significance of effect

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		is minor and only responds to the woodland edge trees. ES Chapter 19: Arboriculture **[APP-056]** does note that during construction, crown lifting and root pruning may be required to facilitate the construction of an access track within Horn Wood at Green Hill F (Ancient Woodland) buffer zone. However, impacts are only anticipated if a) the base of the existing informal track in this location requires removal to install a new subbase, which may cause root damage to edge trees at Three Shires Wood and b) if the canopies of edge trees require pruning to provide clearance for construction traffic. However, mitigation measures, such as re-using existing track subbases wherever possible, hand digging and root pruning under supervision means that the significance of effect is minor and only responds to the woodland edge trees.
Paragraph 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.	Embedded design mitigation measures of the kind set out in this policy are outlined in Section 9.8 of Chapter 9: Ecology and Biodiversity of the ES **[REP1-033]** and are illustrated within the OLEMP **[REP1-137]** and OCEMP **[REP1-131].** These include habitat avoidance, creation, and replacement measures; mitigation relating to

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	• The timing of construction has been planned to avoid or limit disturbance. • During construction and operation best practice will be followed to ensure that the risk of disturbance or damage to species or habitats is minimised, including as a consequence of transport access arrangements. • Habitats will, where practicable, be restored after construction works have finished. • Opportunities will be taken to enhance existing habitats rather than replace them, and where practicable, create new habitats of value within the site landscaping proposals. Where habitat creation is required as mitigation, compensation, or enhancement the location and quality will be of key importance. In this regard habitat creation should be focused on areas where the most ecological and ecosystems benefits can be realised; and • Mitigations required as a result of legal protection of habitats or species will be complied with.	protected and notable species; and standard mitigation measures that comply with industry good practice and environmental legislation. Production of a final CEMP and LEMP will be secured. The OCEMP **[REP1-131]** includes best practice measures to ensure that activities will be confined to the minimum areas required for the works during construction, in accordance with this part of the policy. Section 9.8 of Chapter 9: Ecology and Biodiversity of the ES **[REP1-033]** outlines mitigation measures pertaining to habitat avoidance, creation and replacement measures that comply with this part of the policy.
Paragraph 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.	The management of Biodiversity throughout the life of the Scheme is covered by the OLEMP **[REP1-137]**, OCEMP **[REP1-131]**, OOEMP **[EX4/GH7.2_B]** and ODS **[REP1-135]**. The OCEMP **[REP1-131]** sets out that an Environmental Clerk of Works (ECoW) will provide advice about environmental and ecological issues during construction including,

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		for example, management of protected species, surface water management, pollution, air quality and noise. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.4.40	The government's Environmental Improvement Plan and the Environment Act 2021 mark a step change in ambition for wildlife and the natural environment. The Secretary of State should have regard to the aims and goals of the government's Environmental Improvement Plan, and in Wales the objectives of the Nature Recovery Plan, and any relevant measures and targets, including statutory targets set under the Environment Act elsewhere.	Chapter 9: Ecology and Biodiversity of the ES **[REP1-033]** has been produced with regard to the aims and goals of the 25 Year Environment Plan, as evidenced by the extensive habitat to be provided pursuant to the OLEMP **[REP1-137].** It is therefore considered that the Scheme is compliant with this Policy.
Paragraph 5.4.42	The benefits of national significant low carbon energy infrastructure development may include benefits for biodiversity and geological conservation interests and these benefits may outweigh harm to these interests. The Secretary of State may take account of any such net benefit in cases where it can be demonstrated.	The Scheme has the potential to deliver significant amounts of low-carbon electricity and make a material contribution to help meet the UK's commitments to decrease carbon emissions and reach net zero by 2050, which in turn is beneficial for biodiversity and geological conservation interests. The Scheme has the potential to deliver biodiversity benefits as a result of its embedded mitigation and enhancement measures. As a result, there are no significant adverse impacts will occur on biodiversity features. A Biodiversity Net Gain (BNG) Assessment, using Defra's Metric 4.0, has been provided with the DCO application **[REP1-043]**. This sets out

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		the significant net gains in biodiversity that the Scheme will provide.
Paragraph 5.4.43 Paragraph 5.4.44	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 as a last resort, appropriate compensation measures should be sought. 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.	As outlined in Section 9.9 of Chapter 9: Ecology and Biodiversity of the ES **[REP1-033]**, the residual effects post mitigation during operation results in no significant harm to the key biodiversity interests at all levels within or within close proximity to the Order Limits. The impacts will be mitigated through the provision and management of appropriate habitat to be secured through the LEMP. Embedded design mitigation measures are outlined in Section 9.8 of Chapter 9: Ecology and Biodiversity of the ES **[REP1-033]** and are illustrated within the OLEMP **[REP1-137]**, OCEMP **[REP1-131]**, **O**OEMP **[EX4/GH7.2_B]** and ODS **[REP1-135]**. These include habitat avoidance, creation and replacement measures, mitigation relating to protected and notable species; and standard mitigation measures that comply with industry good practice and environmental legislation. It is therefore considered that the Scheme is compliant with this Policy.

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Paragraph 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 of 30 years, or for the lifetime of the project, if longer.	The Outline Landscape Ecological Management Plan (OLEMP) **[REP1-137]** outlines proposed habitat creation at the site and the Biodiversity Design Strategy. The Scheme is covered by the OCEMP **[REP1-131]**, OOEMP **[EX4/GH7.2_B]** and ODS **[REP1-135]**. Production of a final CEMP, OEMP and DEMP will be secured. Habitat created by the Scheme would be managed and maintained through the operational life of the Scheme, which is expected to exceed 30 years. It is therefore considered that the Scheme is compliant with this policy.
5.7 - Dust, odour, artificial light, smoke, steam and insect infestation Paragraph 5.7.1	During the construction, operation and decommissioning of energy infrastructure there is potential for the release of a range of emissions such as odour, dust, steam, smoke, artificial light and infestation of insects. All have the potential to have a detrimental impact on amenity or cause a common law nuisance or statutory nuisance under Part III, Environmental Projection Act 1990. However, they are not regulated by the environmental permitted regime, so mitigation of these impacts will need to be included in the Development Consent Order.	Emissions resulting in potential statutory nuisances have been captured and assessed with the Statutory Nuisance Statement **[APP-558]**. Mitigation measures to limit the rise of statutory nuisances have been detailed within the OCEMP **[REP1-131]**, OOEMP **[EX4/GH7.2_B]** and ODS **[REP1-135]**. The Outline Battery Safety Management Plan **[REP1-143]** sets out the safety measures proposed to be installed to reduce fire risk as well as fire protection measures.

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Paragraph 5.7.5	The applicant should assess the potential for insect infestation and emissions of odour, dust, steam, smoke and artificial light to have a detrimental impact on amenity, as part of the ES.	The Scheme is not anticipated to cause any effects from insect infestation, steam, smell or other effluvia. Construction and decommissioning activities will be undertaken using best practice measures to minimise air emissions, as set out in the Statutory Nuisance Statement **[APP-558].** Mitigation measures to limit dust and nuisance have been detailed within the OCEMP **[REP1-131]**, OOEMP **[EX4/GH7.2_B]** and ODS **[REP1-135]**. An assessment of air quality impacts and effects as a result of the Scheme has been undertaken is presented in Section 16.8 of ES Chapter 16 Air Quality **[APP-053]**. Mitigation measures have been proposed where required and are summarised in Section 16.7 and 16.9 of this chapter. Lighting will be controlled during the construction and operational phases and details of how this will be done are contained within the OCEMP **[REP1-131]**, OOEMP **[EX4/GH7.2_B]**.
Paragraph 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 16: Air Quality **[APP-053]** and ES Chapter 14 Noise and Vibration **[APP-051]** and in the Consultation Report **[REP1-017]**, the Applicant has been in

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		consultation with the North Northampton Council, West Northampton Council and Milton Keynes City Council to scope and agree the methodology for the assessments.
Paragraph 5.7.8	Mitigation measures may include one or more of the following: • engineering: prevention of a specific emission at the point of generation; control, containment and abatement of emissions if generated; • lay-out: adequate distance between source and sensitive receptors; reduced transport or handling of material; • administrative: limiting operating times; restricting activities allowed on the site; implementing management plans.	Chapter 16 Air Quality of the ES **[APP-053]** considers the likely significant effects of the Proposed Development on air quality and sets out measures for mitigation specific for each phase of the Proposed Development. 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, continued communication with the community and relevant stakeholders, site management and site monitoring/inspections. Mitigation measures are documented within and will be secured by the OCEMP **[REP1-131]**, OOEMP **[EX4/GH7.2_B]** and ODS **[REP1-135].** Chapter 15 of the ES Glint and Glare **[APP-052]** and has undertaken an assessment of potential impacts of glint and glare on surrounding road users, railway operations, dwellings, PRoW, bridleways and aviation activity. The assessment concludes that no impact is predicted from glint and glare; therefore, other

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		than vegetation planting, no meaningful mitigation measures are proposed.
Paragraph 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.	All above ground infrastructure will be carefully removed in accordance with the procedures and controls to be set out in the DEMP and DTMP. The outline mitigation measures are documented within the OCEMP **[REP1-131]**, OOEMP **[EX4/GH7.2_B]** and ODS **[REP1-135].** The underground cables may be left in situ, depending on which method is likely to have the least environmental impact at the time. Currently, the most environmentally acceptable option is leaving the cables and any ducts in situ, as this avoids disturbance to overlying land and habitats and to neighbouring communities.
Paragraph 5.8.9	If, following application of the Sequential Test, it is not possible (taking into account wider sustainable development objectives), for the project to be located in areas of lower flood risk the Exception Test can be applied as defined in Table 2 of the Flood Risk and Coastal Change Guidance. The test provides a method of allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available.	It has not been considered possible to locate the Scheme in areas of lower flood risk as explored within the Sequential and Exception Test provided as Appendix B of the Planning Statement **[EX4/GH7.15_B]**. As such, the Report has included an assessment of the Exception Test where it is considered the Scheme is in conformity with its requirements.
Paragraph 5.8.10	The Exception Test is only appropriate for use where the Sequential Test alone cannot deliver an acceptable site. It would only be appropriate to move onto the Exception Test when the Sequential Test has identified	Following application of the Sequential Test, as set out in Appendix B of the Planning Statement **[EX4/GH7.15_B]**, it is not possible to locate the

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	reasonably available, lower risk site appropriate for the proposed development where, accounting for wider sustainable development objectives, application of relevant policies would provide a clear reason for refusing development in any alternative locations identified. Examples could include alternative site(s) that are subject to national designations such as landscape, heritage and nature conservation designations, for example National Landscapes, SSSIs and World Heritage Sites (WHS) which would not usually be considered appropriate.	development in an area of lower flood risk. Consequently, the Exception Test was carried out. The Scheme meets the requirements of the Exception Test.
Paragraph 5.8.11 Paragraph 5.8.12	Both elements of the Exception Test will have to be satisfied for development to be consented. To pass the Exception Test it should be demonstrated that: • The project provides wider sustainability benefits to the community that outweigh flood risk; and • The project will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. Development should be designed to ensure there is no increase in flood risk elsewhere, accounting for the predicted impacts of climate change throughout the lifetime of the development. There should be no net loss of floodplain storage and any deflection or constriction of flood flow routes should be safely managed within the site. Mitigation measures should make as much use as possible of natural flood management techniques.	The Exception Test, provided at Appendix B of the Planning Statement **[EX4/GH7.15_B]**, has considered these two criteria. The Scheme is considered to satisfy these two criteria and as such, complies with this paragraph. Flood Risk Assessments (FRA) are provided at ES Appendices 10.1 to 10.10 **[APP-098 to APP-107, REP1-053, REP1-055 and REP1-057**]. The FRA provides a detailed assessment of the risk of flooding to and from the Scheme (taking account of climate change) with consideration to mitigation measures and concludes that the risk of flooding will not be increased as a result of the construction, operation or decommissioning of the Scheme. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.8.13	A site specific flood risk assessment should be provided for all energy projects in Flood Zones 2 and 3 in England or Defended Flod Zones 2 and	Flood Risk Assessments (FRA) are provided at ES Appendices 10.1 to 10.10 **[APP-098 to**

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Paragraph 5.8.14	3 in Wales. In Flood Zone 1 in England or Flood 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. 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.	**APP-107, REP1-053, REP1-055 amd REP1-057**]. The FRA provides a detailed assessment of the risk of flooding to and from the Scheme (taking account of climate change) and concludes that the risk of flooding will not be increased as a result of the construction, operation or decommissioning of the Scheme. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 5.8.15	The minimum requirements for Flood Risk Assessments (FRA) are that they should: • Be proportionate to the risk and appropriate to the scale, nature and location of the project. • Consider the risk of flooding arising from the project in addition to the risk of flooding to the project.	Flood Risk Assessments (FRA) are provided at ES Appendices 10.1 to 10.10 **[APP-098 to APP-107, REP1-053, REP1-055]**. The FRA provides a detailed assessment of the risk of flooding to and from the Scheme (taking account of climate change) and concludes that the risk of flooding will not be increased as a result of the construction, operation or decommissioning of the Scheme. This

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	• 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	professional judgement has been made as a result of considering both the potential adverse and beneficial effects anticipated through the design of the Scheme. The FRAs have considered and addressed the criteria within this paragraph.

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	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: ○ Describe the existing surface water drainage arrangements for the site. ○ Set out (approximately) the existing rates and volumes of surface water run-off generated by the site. Detail the proposals for restricting discharge rates. ○ Set out proposals for managing and discharging surface water from the site using sustainable drainage systems and accounting for the predicted impacts of climate change. If sustainable drainage systems have been rejected, present clear evidence of why their inclusion would be inappropriate. ○ Demonstrate how the hierarchy of drainage options has been followed. ○ Explain and justify why the types of SuDS and method of discharge have been selected and why they are considered appropriate. ○ Explain how sustainable drainage systems have been integrated with other aspects of the development such as open space or green infrastructure, so as to ensure an efficient use of the site.	

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	○ Describe the multifunctional benefits the sustainable drainage system will provide. ○ Set out which opportunities to reduce the causes and impacts of flooding have been identified and included as part of the proposed sustainable drainage system. ○ Explain how run-off form the completed development will be prevented from causing an impact elsewhere. ○ Explain how the sustainable drainage system been designed to facilitate maintenance and, where relevant, adoption. Set out plans for ensuring an acceptable standard of operation and maintenance throughout the lifetime of the development. • Detail those measures that will be included to ensure the development will be safe and remain operational during a flooding event throughout the development's lifetime without increasing flood risk elsewhere. • Identify and secure opportunities to reduce the causes and impacts of flooding overall during the period of construction; and • Be supported by appropriate data and information, including historical information on previous events.	
Paragraph 5.8.22	The technology specific NPSs set out some exceptions to the application of the Sequential Test. However, when seeking development consent on a site allocated in a development plan through the application of a 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	A Sequential Test and an Exception Test have been provided as Appendix B of the Planning Statement **[EX4/GH7.15_B]**. The Applicant considers that the Scheme passes the Sequential Test requirements.

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Paragraph 5.8.23	new flood risk information that would have affected the outcome of the test. Consideration of alternative sites should take account of the policy on alternatives set out in Section 4.3. All projects should apply the Sequential Test to locating development within the site.	Given that the Scheme falls within areas of Flood Zone 3, the Scheme has been subject to the Exception Test. It has been concluded that the Scheme meets the requirements of the Exception Test and is therefore in conformity with this paragraph.
Part 5.9 - Historic Environment Paragraph 5.9.1	The construction, operation and decommissioning of energy infrastructure has the potential to result in adverse impacts on the historic environment above, at and below the surface of the ground.	The historic environment impacts of the Scheme and the impacts associated significance in relation to above, at, and below ground level during construction, operation and decommissioning has been explored within Section 12.8 of the ES, Chapter 12: Cultural Heritage **[APP-049]**. The Archaeological Mitigation WSI **[EX4/GH6.3.12.6_A]** ensures the Scheme complies with this paragraph.
Paragraph 5.9.8	Non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to Scheduled Monuments or Protected Wreck Sites should be considered subject to the same policies for considerations designated heritage assets. The absence of designation for such heritage assets does not indicate lower significance or necessarily imply that it is not of national importance.	Non designated heritage assets with archaeological interest are identified in ES Chapter 12: Cultural Heritage of the ES **[APP-049]**. Section 12.6 of Chapter 12: Cultural Heritage of the ES describes these assets and their significance. Section 12.8 of Chapter 12: Cultural Heritage of the ES **[APP-049]** considers the likely significant effects of the Scheme.

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Paragraph 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.	Section 12.8 of Chapter 12: Cultural Heritage of the ES **[APP-049]** contains a clear and detailed assessment of likely impacts and effects of the Scheme on cultural heritage. It concludes that there will be no significant impacts to any designated or non-designated heritage assets, including Listed Buildings or Historic Landscape Character as a result of the Scheme. No additional mitigation is required during the operation and decommissioning phases for designated and non-designated assets within the wider landscape due to embedded mitigation being sufficient to mitigate against any potential impacts, this includes the two Conservation Areas and Listed buildings where moderate adverse effects have been identified. No additional mitigation is required where beneficial effects to archaeological assets have been identified during the operation phase.
Paragraph 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 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	Chapter 12: Cultural Heritage of the ES **[APP-049]** concludes there would be no significant impacts to any designated or non-designated heritage assets as a result of the Scheme once embedded and additional mitigation measures are implemented. The significance of heritage assets within the study area (including the contribution made by setting) is set out in

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	heritage assets themselves using expertise where necessary according to the proposed development's impact.	Appendix 12.3: Archaeological Desk-based Assessment and Stage 1 Setting Assessment **[APP-128]**. Section 6 of ES Appendix 12.5 Heritage Statement **[APP-139 to APP-145]** assess the significance of the heritage assets and detail the contributions made by their settings.
Paragraph 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.	Section 12.6 of Chapter 12: Cultural Heritage of the ES **[APP-049]** describes the heritage assets within the study area for the Scheme and their significance and the contribution of their setting to that significance.
Paragraph 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 measures that address those heritage assets which are at risk or which may become at risk, as result of the scheme. • Considering how visual or noise impacts can affect heritage assets, and whether there may be opportunities to enhance access to, or	Section 12.7 of Chapter 12: Cultural Heritage of the ES **[APP-049]** outlines the mitigation measures embedded within the Scheme design pertaining to cultural heritage. This includes the provision of stand-offs between the Scheme and heritage assets in order to help to preserve their setting during the construction, operational and decommissioning periods. Appropriate and sensitive screening has also been developed and implemented to minimise the visual intrusion of the Scheme, while avoiding, obscuring or intruding upon key views and relationships between heritage assets.

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	interpretation, understanding and appreciation of, the heritage assets affected by the scheme.	The Scheme will also be decommissioned at the end of its operational life. Following decommissioning, any impacts of the setting of heritage assets as a result of the solar farm will have been reversed.
Paragraph 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.	The nature of the Scheme was considered by the Applicant as part of the assessment on Cultural Heritage that is provided in Chapter 12: Cultural Heritage **[APP-049]**. A key aspect of the Scheme is its reversible nature which means that landscape features, will not be impacted by the Scheme. Any such harm caused to the significance of heritage assets will be reversed following decommissioning of the Scheme.
Paragraph 5.9.17	Applicants should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.	There are no Conservation Areas or World Heritage Sites within the Order Limits of the Scheme. Chapter 12: Cultural Heritage **[APP-049]** assesses the effects of the Scheme on heritage assets. The Scheme subject to the embedded mitigation measures during the construction and operational phases shall preserve the setting of heritage assets close to the site.
Paragraph 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	Please see response to 5.9.12 above.

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	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 parities during the examination process; and • Expert advice, where appropriate, and when the need to understand the significance of the heritage asset demands it.	
Paragraph 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.	Section 12.8 of Chapter 12: Cultural Heritage of the ES [**APP-049**] assesses the likely impacts of the Scheme on cultural heritage, including direct and indirect, and temporary or permanent effects. There would be no significant adverse effects on designated or non-designated heritage assets. It is not envisaged that there would be any direct impacts to any elements that contribute to the historic landscape character beyond that

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		caused during the construction phase (i.e. removal of hedgerow). Instead, landscape mitigation as part of the Scheme will result in the enhancement of hedgerow and woodland shelter belts and so will provide a beneficial effect to the Historic Landscape Character.
Paragraph 5.9.28 Paragraph 5.9.29 Paragraph 5.9.30 Paragraph 5.9.31 Paragraph 5.9.32	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 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. Substantial harm to or loss of significance of a Grade II Listed Building Park or Grade II Registered Park or Garden should be exceptional. 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* Registered Parks and Gardens; and World Heritage Sites, should be wholly exceptional. 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	The Scheme is not likely to result in any significant adverse effects on cultural heritage. The design development has sensitively considered the key receptors throughout, and appropriate mitigation measures are embedded into the design. By implementing Good Design at the early stages of the process, the Scheme has avoided and minimised conflict with designated and non designated heritage assets. Through the implementation of mitigation measures, all residual effects are assessed as not significant and equate to less than substantial harm on all designated and non-designated heritage assets impacted by the Scheme as set out in Appendix 12 – Cultural Heritage Impact Assessment Tables of Chapter 12 [APP-049] of the ES. The assessment in the Heritage Statement in Appendix 12.5 of Chapter 12 Cultural Heritage **[APP-139 to APP-145**] concludes that there is potential for less than substantial harm, at the

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	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.	upper end of the scale to Low Farmhouse (NHLE 1371681) and Station Lodge (NHLE 129415) as a result of construction traffic during the construction phase. The assessment concludes that there is less than substantial harm to 17 designated and non-designated heritage assets, including:12 Listed Buildings (one Grade I Listed, one Grade II* Listed, ten Grade II Listed); two Conservation Areas; and three non-designated heritage assets. The assessment concludes that there is less than substantial harm, at the lower end of the scale to 18 designated and non-designated heritage assets, including: six Listed buildings (Grade II Listed); and 12 non-designated heritage assets.
Paragraph 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.	The Scheme's design has been carefully considered to avoid, reduce, or mitigate potentially significant effects on cultural heritage and archaeology assets as set out in the Planning Statement. This resulted in a Scheme that avoids direct physical impact on any designated heritage assets. Whilst there will be some residual impacts resulting from changes to the setting of some designated heritage assets, these have been assessed to result in

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		'less than substantial harm' as set out in ES Chapter 12: Cultural Heritage **[APP-049]**. Impacts upon the setting of heritage assets have been minimised by design modifications, with additional vegetation planted in the screen panels, so any residual effect is not significant and the harm to significance is considered to be less than substantial. The Scheme would cause harm to designated heritage assets by introducing changes within their setting, which will affect how the asset is experienced and understanding of the archaeological assets below ground. Further, the substantial public benefits and need for the Scheme, as set out in the Planning Statement **[EX4/GH7.15_B]**, including the delivery of Critical National Priority (CNP) infrastructure to contribute towards meeting national energy security objectives and carbon reduction commitments, clearly and demonstrably outweigh the less than significant harm to cultural heritage assets.
Paragraph 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.	Non-designated heritage assets are identified in Chapter 12: Cultural Heritage of the ES **[APP-049]**. Section 12.6 of Chapter 12: Cultural

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		Heritage of the ES describes these assets and their significance. Chapter 12: Cultural Heritage of the ES **[APP-049]** concludes there would be no significant impacts to any designated or non-designated heritage assets as a result of the Scheme once embedded and additional mitigation measures are implemented. The SoN **[APP-556]** presents a detailed and compelling case for why the Scheme is urgently required and at the scale proposed. The scale of the Scheme inherently poses adverse effect upon some non-designated heritage assets, with a balanced judgement in mind, it is considered that this harm is demonstrably outweighed by the benefits of the Scheme.
Paragraph 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.	There are no heritage assets identified in the study area where evidence was found of deliberate neglect of, or damage to, the asset.
Paragraph 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 significant weight to any negative effects, when weighing	Chapter 12: Cultural Heritage of the ES **[APP-049]** concludes there would be no significant impacts to any designated or non-designated heritage assets as a result of the Scheme once embedded and additional mitigation measures are implemented. Further, the proposed planting, that is designed to preserve open

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	them against the wider benefits of the application. The greater the negative impact on the significance of the designated and heritage asset, the greater the benefits that will be needed to justify approval.	views, would contribute to the significance of the conservation area.
Part 5.10 - Landscape and Visual Paragraph 5.10.5	Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation.	As outlined in Chapter 8: Landscape and Visual Impact Assessment (LVIA) **[APP-045],** there is an acknowledgement that the Scheme will have moderate adverse significant effects on the local study area at construction and at Year 1. Following establishment of the embedded landscape mitigation these effects reduce to moderate/minor adverse at Year 15. Effects at decommissioning are minor adverse. As a consequence of the embedded landscape mitigation there will be a moderate beneficial significant effect on the landscape fabric at Year 15 and decommissioning.
Paragraph 5.10.6	Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.	Due consideration has been given to the effects of the Scheme upon the landscape. As detailed in Section 6.3 of the Planning Statement **[EX4/GH7.15_B]**, the Scheme has been subject to a detailed and sensitive iterative design process. This has taken account of the context and features and features of the land within the Order limits, nearby sensitive receptors and assets, information emerging from environmental surveys, feedback from stakeholders, and opportunities and constraints

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		in order to develop a good design that balances the need to maximise the energy generation capacity of the Scheme, with the avoidance and mitigation of impacts, and provision of environmental and other enhancements, where practicable. The design process and basis of design decisions taken are described in the Chapter 5: Alternatives and Design Evolution of the ES **[APP-042]** and the Design Approach Document **[APP-560]**.
Paragraph 5.10.7	National Parks, the Broads and National Landscapes have been confirmed by the government as having the highest status of protection in relation to landscape and natural beauty. Each of these designated areas has specific statutory purposes. Projects should be designed sensitively given the various siting, operational, and other relevant constraints. For development proposals located within designated landscapes the Secretary of State should be satisfied that measures which seek to further purposes of the designation are sufficient, appropriate and proportionate to the type and scale of the development.	As outlined in Chapter 8: LVIA **[APP-045]**, neither the DCO Site nor the Outer 5km Study Area of the Scheme is covered by any statutory landscape designations (e.g., National Parks or National Landscapes). No impacts on National Parks, the Broads and National Landscapes have been identified.
Paragraph 5.10.8	The duty to seek to further the purposes of nationally designated landscapes also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. In these locations, projects should be designed sensitively given the various siting, operational, and other relevant constraints. The Secretary of State should be satisfied that measures which seek to further the purposes of the designation are sufficient, appropriate and proportionate to the type and scale of the development.	As stipulated by this policy, Chapter 8: LVIA **[APP-045]** shows regard for nationally designated areas. No impacts on National Parks, the Broads or National Landscapes have been identified.

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Paragraph 5.10.11	Development within a Heritage Coast (that is not also a National Park, The Broads or a National Landscape) is unlikely to be appropriate, unless it is compatible with the natural beauty and special character of the area.	The Scheme is not situated within a Heritage Coast and therefore, this paragraph is not relevant.
Paragraph 5.10.12	Outside nationally designated areas, there are landscapes that may be highly valued locally. Where a local development document in England or a local development plan in Wales has policies based on landscape or waterscape character assessment, these should be paid particular attention. However, locally valued landscapes should not be used in themselves to refuse consent, as this may unduly restrict acceptable development.	As detailed within ES Chapter 3 **[REP1-029]**, Site G is located in the proposed extension of the Ouse Valley Special Landscape Area, set out in Milton Keynes emerging Local Plan. However, Milton Keynes's emerging Local Plan has also put forward this area as areas of search for wind turbines and solar farms. Therefore, the Scheme is considered to be compliant with Milton Keynes's emerging Local Plan.
Paragraph 5.10.13 Paragraph 5.10.14	All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites. The Secretary of State will have to judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the project.	Chapter 8: LVIA of the ES **[APP-045]** has addressed the construction, short-term operational (at Year 1), long term operational (at Year 15) and decommissioning visual impacts of the Scheme. It is considered that the three significant adverse residual effects of the Scheme at Year 15 and two at the decommissioning phase are clearly and comprehensively outweighed by the benefits of the Scheme, as set out at Section 4 of the Planning Statement **[EX4/GH7.15_B]**, in terms of delivering renewable energy infrastructure, which is urgently needed to

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		create a secure and affordable energy system and to help combat climate change. Furthermore, there will be a significant moderate benefit on the landscape fabric on the decommissioning of the Scheme, due to the Landscape Legacy and retention of the mitigation planting. Although it is acknowledged that there will be an adverse effect on the local study area (1km) and private, transport and public receptors at Year 15 of operation and during the decommissioning phase, these benefits of the Scheme (including need) significantly outweigh these adverse effects.
Paragraph 5.10.16	The applicant should carry out a landscape and visual impact assessment and report it in the ES, including cumulative effects (see Section 4.3). Several guides have been produced to assist in addressing landscape issues.	An assessment of the potential landscape and visual impacts associated with the construction, operation and decommissioning of the Scheme has been carried out and is presented in Chapter 8: Landscape and Visual Impact **[APP-045]** of the ES.
Paragraph 5.10.17	The landscape and visual assessment should include reference to any landscape character assessment and associated studies as a means of assessing landscape impacts relevant to the proposed project. The applicant's assessment should also take account of any relevant policies based on these assessments in local development documents in England and local development plans in Wales.	ES Chapter 8: LVIA **[APP-045]** considers the relevant landscape character assessments and related studies at national, regional, county and neighbourhood levels. As demonstrated in the local policy sections of this Accordance Table below, the landscape and visual impact assessment has taken account of relevant policies in local plan development documents.

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		Refer to Figure 8.5: Landscape Character Areas **[APP-259]** illustrate the Landscape Character Areas and the assessment is considered in ES Chapter 8: LVIA **[APP-045]**. The Scheme, therefore, demonstrates full compliance with this policy.
Paragraph 5.10.19	The applicant should consider landscape and visual matters in the early stages of siting and design, where site choices and design principles are being established. This will allow the applicant to demonstrate in the ES how negative effects have been minimised and opportunities for creating positive benefits or enhancement have been recognised and incorporated into the design, delivery and operation of the scheme.	As set out in Section 6.4 of the Planning Statement **[EX4/GH7.15_B]** and described within ES Chapter 8: Landscape and Visual Impact **[APP-045]**, the Scheme has been the subject of an iterative design process, informed by analysis of landscape and visual constraints, iterative impact assessments and mitigation proposals. The mitigation strategy and design development are based on the Landscape Design Parameters set out at Table 8.7 of ES Chapter 8 LVIA **[APP-045]**. This has helped ensure that primary landscape mitigation is co-ordinated with other relevant disciplines, such as ecology, to determine the key parameters and agree offsets to improve the value of landscape and reflect appropriate local, regional and national aims and objectives for ecology and biodiversity.

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Paragraph 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 a National Landscape the assessment should include effects on the natural beauty and special qualities of these areas.	ES Chapter 8: LVIA **[APP-045]** includes the effects on landscape and visual receptors during construction, operation (at Year 1 and Year 15) and decommissioning. There are no National landscape designations such as National Parks or National Landscapes, contained within the Outer 5km Study Area of the Scheme.
Paragraph 5.10.21	The assessment should include the visibility and conspicuousness of the project during construction and of the presence and operation of the project and potential impacts on views and visual amenity. This should include light pollution effects, including on dark skies, local amenity, and nature conservation.	ES Chapter 8: LVIA **[APP-045]** includes the effects on landscape and visual receptors during construction, operation (at Year 1 and Year 15) and decommissioning.
Paragraph 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.	Artificial lighting will be required during construction and decommissioning in areas where natural lighting is unable to reach (sheltered/confined areas), and during core working hours within winter months. All construction lighting will be deployed in accordance with the recommendations set out in the OCEMP **[REP1-131]** and will minimise potential for light spillage outside the Scheme and Cable Corridor, particularly towards houses, traffic and ecological habitats. Details of operational lighting are set out by Chapter 4: Scheme Description of the ES

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		[REP1-031]. This explains that no part of the Scheme will be continuously lit. Manually operated, and motion detection lighting will be utilised for operational and security purposes around electrical infrastructure. Lighting will be directed downward and away from boundaries. No visible lighting will be utilised at the site perimeter fence, aside from the site entrance points.
Paragraph 5.10.24	Applicants should consider how landscapes can be enhanced using landscape management plans, as this will help to enhance environmental assets where they contribute to landscape and townscape quality.	Good design has been a key consideration from the outset. The ES Chapter 8: Landscape and Visual Impact ES Chapter 8 LVIA **[APP-045]** includes the effects on landscape and visual receptors during construction, operation (at Year 1 and Year 15) and decommissioning. Landscaping has informed the iterative design process, including taking account of published landscape character assessment guidance and fieldwork analysis. The overall objective of the landscape design is to integrate the Scheme into its landscape setting and avoid or minimise adverse landscape and visual effects as far as practicable. The design has been developed in collaboration with the wider design team, other specialists and the Host Authorities' landscape advisors to achieve a solution that achieves this

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		objective whilst maximising opportunities to deliver net gain in biodiversity gain. Accordingly, the landscape design aims to achieve the following: • To integrate the Scheme into the existing landscape pattern as far as possible by retaining and following existing features, including vegetation, where practicable. • To replace vegetation loss because of construction of the Scheme through areas of new planting. • To filter and screen more prominent components of the Scheme in views from visual receptors. Details of the landscape measures embedded into the Scheme design, including a summary of their environmental functions, is presented in the OLEMP **[REP1-137]**.
Part 5.11 – Land Use Paragraph 5.11.12 Paragraph 5.11.13	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). 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.	The majority of the land in the Scheme is arable. The desk study and field surveys indicate that the soils of the Sites are predominantly slowly permeable, calcareous or non-calcareous clayey soils. The ALC Grades of the Sites and Cable Route Corridor range from Grade 1 to 3b. The Best and Most

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Paragraph 5.11.14	Applicants are encouraged to develop and implement a Soil Management Plan which could help minimise potential land contamination. The sustainable reuse of soils needs to be carefully considered in line with good practice guidance where large quantities of soils are surplus to requirements or are affected by contamination.	Versatile (BMV) land covers 854.5 hectares, making up 65% of the Order Limits. This is justified by the Scheme helping to meet the UK's net zero 2050 ambitions as well as other benefits, such a biodiversity net gain, as explained in Section 4 of the Planning Statement **[EX4/GH7.15_B]** An Outline Soil Management Plan (OSMP) **[APP-550]** has been prepared which sets out the measures to manage any potential impacts to the soil (and agricultural land) during the construction, operational (including maintenance) and decommissioning phases, and will be secured by DCO requirement. The outline Soil Management Plan identifies those areas within the Site which may be more susceptible to damage, for example, the temporary access tracks, construction compounds and steep slopes and qualities of the soil, for example when it is wet or after periods of heavy rainfall or high winds and it will advise on when soils are suitable for being handled or trafficked. The OSMP **[APP-550]** also details measures for soil management and follow the principles of best practice to maintain the physical properties of the soil, with the aim of restoring the land to

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		its pre-construction condition following the temporary construction use and at the end of the lifetime of the Scheme.
Paragraph 5.11.15	Developments should contribute to and enhance the natural and local environment by preventing new and existing developments from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.	The effects of Scheme on the natural and local environment are considered in the Environmental Statement **[APP-037 to APP-554]**. The Scheme does not anticipate any adverse or beneficial significant effects in its own right or cumulatively with other developments on air quality, noise, water resources, land contamination or land instability.
Paragraph 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.	Chapter 22: Ground Conditions and Contamination of the ES **[REP1-025]** outlines that the Site has largely remained undeveloped throughout its entire history, except for localised construction of minor structures, tracks, paths and access roads. Numerous gravel pits and small quarries are shown to be distributed across the Site. The applicant has carried out extensive consultation with the Local Planning Authorities including relevant statutory consultees. This is described in the Consultation Report **[REP1-017].**

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Paragraph 5.11.19	Applicants should safeguard any mineral resources on the proposed site as far as possible, taking into account the long-term potential of the land use after any future decommissioning has taken place.	As detailed within ES: Chapter 11 Minerals **[APP-048]**, the Sites potentially impact a sand and gravel allocation known as M2 Strixton – Bozeat as well as two existing quarry areas and the mineral consultation areas associated with existing quarries and allocations. The Scheme also falls within the Northamptonshire Sand and Gravel Mineral Safeguarding Area. Given the unintrusive nature of the Scheme, it is proposed that no adverse harm will occur upon these Safeguarding Areas. The Scheme will be decommissioned after 60 years of operation, and any impacts caused by the Scheme related to land use are considered reversible and temporary. The minerals within the Order limits will not be permanently sterilised, and post-decommissioning, the land could be worked for minerals.
Paragraph 5.11.28	Where a proposed development has an impact upon a Mineral Safeguarding Area (MSA), the Secretary of State should ensure that appropriate mitigation measures have been put in place to safeguard mineral resources.	As detailed within ES: Chapter 11 Minerals **[APP-048]**, In terms of Green Hill A, A.2 and B together with associated Cable Route Corridors, these sites all affect sand and gravel Mineral Safeguarding Areas, and the Scheme would prevent exploitation of these mineral resources for the life of the Scheme. There is no evidence to suggest there has been any significant sand and gravel extraction within or in the vicinity of

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		these sites nor the relevant section of the Cable Route Corridor. None are allocated for future mineral extraction in the Northamptonshire Minerals and Waste Local Plan.
Paragraph 5.11.30 Paragraph 5.11.31	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 mya be to improve and 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 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.	The Scheme has sought to minimise disruption upon Public Rights of Way (PRoW) and Open Access Land. Where this has not been possible, ensuring minimal disruption, providing ample notice and ensuring continued passage has been of paramount importance. Where PRoW issues have arisen, the Outline Public Rights of Way Management Plan (OPRoWMP) **[REP1-147]** has captured appropriate mitigation measures. Section 13.9 of Chapter 13: Transport and Access of the ES **[EX2/GH6.2.13_A]** sets out the mitigation measures embedded in the Scheme, including that the Scheme seeks to protect and enhance the existing PRoW network and ensure the provision of new and improved multi-user routes.
Secretary of State Decision Making Paragraph 5.11.32	The Secretary of State should not grant consent for development on existing open space, sports and recreational buildings and land unless an assessment has been undertaken either by the local authority or independently, which has shown the open space or the buildings and land to be surplus to requirements or the Secretary of State determines that the benefits of the project (including need), outweigh the potential loss of such	The Scheme does not propose development on existing open space, sports and recreational buildings and land.

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	facilities, taking into account any positive proposals made by the applicant to provide new, improved or compensatory land or facilities.	
Part 5.12 - Noise and Vibration Paragraph 5.12.5	Factors that will determine the likely noise impact of a proposed development include: • The inherent operational noise from the proposed development, and its characteristics. • The proximity of the proposed development to noise sensitive premises (including residential properties, schools and hospitals) and noise sensitive areas (including certain parks and open spaces). • The proximity of the proposed development to quiet places and other areas that are particularly valued for their soundscape or landscape quality. • The proximity of the proposed development to sites where noise may have an adverse impact on protected species or other wildlife, including migratory species; and • The potential presence of unexploded ordnance on the seabed.	Noise generation arising from the Scheme have been identified within ES Chapter 14: Noise and Vibration **[APP-051]**. Through embedded mitigation measures (detailed within Section 14.7 of ES Chapter 14: Noise and Vibration **[APP-051]**), no significant residual effects are predicted during construction, operation and decommissioning of the Scheme on all receptors. Vibration levels from activities (i.e. on-site works and construction HGV traffic) are anticipated to be below SOAEL and as such is equivalent to low magnitude of impact. This is equivalent to a moderate effect which is not considered to be significant. Typical decommissioning noise levels across the overall duration of the decommissioning programme will likely be limited to a low magnitude impact. For receptors of high sensitivity this equates to a moderate adverse effect which is not considered to be significant.
Paragraph 5.12.6	Where noise impacts are likely to arise from the proposed development, the applicant should include the following in the noise assessment:	Chapter 14: Noise and Vibration of the ES **[APP-051]** presents a noise assessment in accordance with the requirements of this policy.

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	• A description of the noise generating aspects of the development proposal leading to noise impacts, including the identification of any distinctive tonal characteristic, if the noise is impulsive, whether the noise contains particularly high or low frequency content or temporary characteristics of the noise.
	• Identification of noise sensitive receptors and noise sensitive areas that may be affected.
	• The characteristics of the existing noise environment.
	• A prediction of how the noise environment will change with the proposed development:
	  ○ In the shorter term, such as during the construction period.
	  ○ In the longer term, during the operating life of the infrastructure; and
	  ○ At particular times of the day, evening and night (and weekends) has 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/and 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
		Figures 14.6 to 14.11 of Chapter 14: Noise and Vibration of the ES **[APP-051]** describes the noise sensitive receptors and areas that have been identified. These have been determined through desktop study during the scoping process and confirmed during site visits. The locations of these receptors have been considered in both the construction and operational noise assessments and are considered representative of adjacent properties.
		Section 14.6 of Chapter 14: Noise and Vibration of the ES **[APP-051]** outlines the characteristics of the existing noise environment for the Scheme and surrounding areas.
		Section 14.7 of Chapter 14: Noise and Vibration **[APP-051]** describes the embedded design mitigation for the Scheme with respect to noise and vibration, encompassing the construction, operation and decommissioning phases.
		Section 14.8 of Chapter 14: Noise and Vibration of the ES **[APP-051]** assesses the noise generated by the Scheme during the construction period and operating life of the infrastructure (including tonality), including at particular times of the day and at night, on the noise sensitive premises and areas outline in

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	• All reasonable steps taken to mitigate potential adverse effects on health and quality of life.	Table 14.22 of Chapter 14: Noise and Vibration of the ES **[APP-051]**.
Paragraph 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 EA and/or the SNCB, and other relevant bodies, such the MMO or NRW, as necessary, and in particular regarding assessment of noise on protected species or other wildlife. The results of any noise surveys and predictions may inform the ecological assessment. The seasonality of potential affected species in nearby sites may also need to be taken into account.	The Consents and Agreement Position Statement **[REP1-149]** has been prepared as part of the DCO application (DCO Application) and should be read in conjunction with the other documents submitted with the DCO Application. The purpose of this document is to provide information on the additional consents and licences potentially required for the Scheme, in addition to the DCO. Chapter 9: Ecology and Biodiversity of the ES **[REP1-033]** assesses the likely significant effects of the Scheme on the protected species and other wildlife. The assessment takes account of noise impacts and concludes that no significant effects arise. The Applicant has taken account of advice from the EA and Natural England in preparing the Environmental Statement **[APP-038 to APP-064].**
Paragraph 5.12.12	Applicants should submit a detailed impact assessment and mitigation plan as part of any development plan, including the use of noise mitigation and noise abatement technologies during construction and operation.	Chapter 14: Noise and Vibration of the ES **[APP-051]** presents a noise assessment in accordance with the requirements of this policy. Figures 14.1-14.5 **[APP-449 to APP-453]** describe the noise sensitive premises and areas

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		that have been identified. These have been determined through desktop study during the scoping process and confirmed during site visits. The locations of these receptors have been considered in both the construction and operational noise assessments and are considered representative of adjacent properties. Section 14.6 of Chapter 14: Noise and Vibration of the ES **[APP-051]** outlines the characteristics of the existing noise environment for the Scheme and surrounding areas. Section 14.7 of Chapter 14: Noise and Vibration of the ES **[APP-051]** describes the embedded design mitigation for the Scheme with respect to noise and vibration, encompassing the construction, operation and decommissioning phases. Section 14.8 of Chapter 14: Noise and Vibration of the ES **[APP-051]** assesses the noise generated by the Scheme during the construction period and operating life of the infrastructure (including tonality), including at particular times of the day and at night, on the noise sensitive premises and areas outlined in

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		Table 14.22 of Chapter 14: Noise and Vibration of the ES **[APP-051]**.
Paragraph 5.12.14	Mitigation measures may include one or more of the following: • Engineering: reducing the noise generated at source and/or containing the noise generated • Lay-out: where possible, optimising the distance between the source and noise-sensitive receptors and/or incorporating good design to minimise noise transmission through the use of screening by natural or purpose-built barriers, or other buildings • Administrative: using planning conditions/obligations to restrict activities allowed on the site at certain times and/or specifying permissible noise limits/noise levels, differentiating as appropriate between different times of day, such as evenings and late at night, and taking into account seasonality of wildlife in nearby designated sites • Insulation: mitigating the impact on areas likely to be affected by noise including through noise insulation when the impact is on a building.	Section 14.7 of Chapter 14: Noise and Vibration of the ES **[APP-051]** details the embedded mitigation measures that have been embedded into the Scheme's design and construction methodology to minimise adverse effects where practicable.
Paragraph 5.12.15	The project should demonstrate good design through selection of the quietest or most acceptable cost-effective plant available; containment of noise within buildings wherever possible, taking into account any other adverse impacts that such containment might cause (e.g. on landscape and visual impacts; optimisation of plant layout to minimise noise emissions; and, where possible, the use of landscaping, bunds or noise barriers to reduce noise transmission).	The Scheme has demonstrated good design through the inclusion of noise and vibration mitigation measures. Section 14.7 of Chapter 14: Noise and Vibration of the ES **[APP-051]** details the embedded mitigation measures for the operational phase. Chapter 8 Landscape and Visual Amenity of the ES **[APP-045]** sets out an assessment of how the Scheme's design, which includes embedded mitigation

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		measures, will have an effect on landscape and visual impacts, and sets out any necessary mitigation measures.
Part 5.13 - Socio-economic Paragraph 5.13.4	The applicant's assessment should consider all relevant socio-economic impacts, which may include: • The creation of jobs and training opportunities. Applicants may wish to provide information on the sustainability of the jobs created, including where they will help to develop the skills needed for the UK's transition to Net Zero. • 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 phase 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	The Outline Skills Supply Chain and Employment Plan **[APP-552]** assesses the specific requirements across the three Council areas which seek to promote greater access to training and learning opportunities so local people can gain access to higher skilled jobs. Section 7.8 sets out an employment plan to promote employment at all levels including apprenticeships and how such opportunities will be delivered and monitored. Chapter 17: Socio-Economics, Tourism and Recreation (SETR) **[APP-054]** of the ES includes an assessment of socio-economic impacts for the Scheme which responds to the points in the policy. The Scheme is likely to have impacts on socio-economic receptors at the local and regional level, and to a more minor extent, the national level. These effects are predominantly focused on economic impacts (particularly during construction), given the nature of the Scheme. Impacts on socio-demographic receptors are likely to be limited to those as a result of the anticipated construction workforce and the

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	physical infrastructure such as energy water, transport and waste). There could also be effects on social cohesion depending as a result of the development; and • Cumulative effects – if development consent were to be granted to for a number of projects within a region and these were developed in a similar timeframe, there could be some short-term negative effects, for example a potential shortage of construction workers to meet the needs of other industries and major projects within the region.	related indirect impacts on socio-demographic characteristics. The Scheme is of a nationally significant scale, and as such will provide a significant number of employment opportunities for direct and indirect sectors of the local and regional economy during construction. These will also have knock-on impacts on other socio-economic factors such as wages, unemployment, and deprivation as a result of increased access to employment. The Scheme is likely to have an impact on tourism and recreation receptors, albeit these are likely to be limited to those receptors that are directly impacted affected by the location of the Scheme such as PRoWs, and landscape visual receptors and local heritage assets that rely on their setting for their value to the tourism and recreational economy. The Scheme, being located on existing agricultural land, is not anticipated to directly impact on the use and accessibility of dedicated recreational spaces and tourist attractions. The Scheme may impact on the use of PRoWs which cross the Scheme's boundaries during the project's construction, but this will be addressed in the OPRoWWMP) **[REP1-147]**

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Paragraph 5.13.5	Applicants should describe the existing socio-economic conditions in the areas surrounding the proposed development and should also refer to how the development's socio-economic impacts correlate with local planning policies.	Chapter 17: SETR of the ES **[APP-054]** includes a baseline assessment of the conditions of the area.
Paragraph 5.13.6	Socio-economic impacts may be linked to other impacts, for example visual impacts considered in Section 5.10 but may also have an impact on tourism and local businesses. Applicants are encouraged, where possible, to demonstrate that local suppliers are considered in any supply chain.	Chapter 17: SETR of the ES **[APP-054]**, considers the socio-economic impact of the Scheme. It also sets out that in procurement of the contractor to complete the construction works, strong consideration will be given to their strategy for engaging the local supply chain and using local materials where possible and practical. The permanent jobs created to support the Scheme are a reflection of the requirements to maintain the infrastructure. An Outline Skills, Supply Chain and Employment Plan (OSSCEP) **[APP-552]** will be prepared prior to the commencement of construction. This will set out measures that the Applicant will implement in order to: • Advertise and promote employment opportunities associated with the Scheme in construction and operation locally. • Advertise those elements of the supply chain required for the construction and operation of the authorised development

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		and which provide opportunities for Local Companies.
Paragraph 5.13.7	Applicants should consider development accommodation strategies where appropriate, especially during construction and decommissioning phases, that would include the need to provide temporary accommodation for construction workers if required.	Chapter 17: SETR of the ES **[APP-054]** considers temporary accommodation and the requirements for the housing of construction workers. It acknowledges that there will be a short to medium term temporary minor adverse effect during construction as there will be a decreased supply of accommodation for residents due to the requirement for inbound temporary construction works, within the Study Area. Mitigation measures include investment in local recruitment and procurement to increase the proportion of construction workforce within the Study Area but the effects are still considered to be short to medium term temporary minor adverse. The transport of these construction workers is considered in Chapter 13 Transport and Access **[REP2-003]** of the ES, which states that on average, it has been assumed that a shuttle bus will be able to accommodate 15 workers. As such, a spread of between 40% and 60% of construction workers across the Scheme Sites is expected to arrive by shuttle bus. This is a similar range to other DCO Solar Scheme

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		consents. For example, Longfield Solar Farm (PINS reference EN010118) assumed that 55% of the workforce would arrive by shuttle bus and Cottam Solar Project (PINS reference EN010133) assumed 50%.
Paragraph 5.13.11 Paragraph 5.13.12	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 potions for phasing development in relation to the socio-economic impacts. 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.	Section 4 of the Planning Statement **[EX4/GH7.15_B]** describes some of the other benefits of the Scheme, in addition to the energy and climate change benefits. Benefits of the Scheme to the local community (other than the generation of a substantial amount of renewable energy), are set out in Section 4.6 of the Planning Statement **[EX4/GH7.15_B]**. These include: • A significant biodiversity net gainin habitat units (delivered through the creation of other neutral grasslands within the sites), hedgerow units, and river units as shown within the Biodiversity Net Gain Assessment **[REP1-043]**. • Employment during the construction phase. It is expected that an average of 464 direct FTE jobs per annum will be created during the construction period. During the operational phase, a gross 15 FTE direct staff per annum would be employed on the

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		site, set out in ES Chapter 17: SETR **[APP-054]**. • An Outline, Skills, Supply Chain and Employment Plan (OSSCEP) **[APP-552]** will be prepared prior to the commencement of construction. This will set out measures that the Applicant will implement in order to advertise and promote employment opportunities associated with the Scheme in construction and operation locally.
Part 5.14 - Traffic and Transport Paragraph 5.14.8 Paragraph 5.14.9	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: • Reduce the need for parking associated with the proposal. • Contribute to decarbonisation of the transport network; and • Improve user travel options by offering genuine modal choice. The assessment should also consider any possible disruption to services and infrastructure (such as road, rail and airports).	The OCTMP) **[REP3-064]** provides a framework for the management of construction vehicle movements (freight and worker movements) to and from the Scheme. It will ensure that the effects of the construction phase are minimised. The OCTMP sets out construction access arrangements, construction vehicle routing, construction vehicle trip generation, and the management/mitigation measures. An OCTMP **[REP3-064]** outlines measures that will be included in the final OCTMP to mitigate transport impact, manage demand, and improve and encourage construction staff to access the Order limits by public transport, cycling and reduce car transport to and parking at, the Order Limits.

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Paragraph 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 show how consideration has been given to the provision of adequate active public or shared transport access and provision.	Chapter 13: Transport and Access of the ES **[REP2-003]** states that there are anticipated to be no significant adverse effects on vehicle travellers, Non-Motorised Users (NMUs) or public transport users as a result of the construction, operation or decommissioning of the Scheme. The Scheme is also expected to have a negligible impact on accidents and safety for the remainder of the highway network. The OCTMP has been prepared to minimise the impact of construction vehicle movement **[REP3-064]**. As part of the ODS **[REP1-135]**, a Decommissioning Traffic Management Plan will be agreed to mitigate the impacts of decommissioning activities at the relevant time to reflect the conditions at the time. Therefore, it is considered that the Scheme is compliant with this policy.
Part 5.15 – Resource and Waste Management Paragraph 5.15.1	Government policy on hazardous and non-hazardous waste is intended to protect human health and the environment by producing less waste and by using it as a resource wherever possible. Where this is not possible and disposal is required as a last resort, waste management regulation	Section 7.8.35 of ES Chapter 7 Climate Change **[APP-044]** quantifies the estimated volume of waste that is to be produced during construction, section 7.8.58 during operation. The impact during the decommissioning phase

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	ensures that waste is disposed of in a way that is least damaging to the environment and to human health.	is expected to be less than what has been considered for the construction phase. The Scheme will seek to minimise and design out waste streams where possible. Opportunities to re-use materials, such as BESS equipment for renewable wind storage, will be explored prior to the recycling of equipment.
Paragraph 5.15.3	Disposal of waste should only be considered where other waste management options are not available or where it is the best overall environmental outcome.	The Scheme seeks to reuse wasted equipment where a second life use is possible. Where it is not, materials will be recycled as far as practical. These measures are captured within the OCEMP **[REP1-131]** and the ODS **[REP1-135]**.
Paragraph 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.	The Scheme has been designed and will be constructed and operated to minimise the creation of waste, maximise the use of recycled materials and assist the collection, separation, sorting, recycling and recovery of waste arising from the development during its use. The proposed arrangements for managing any waste produced by the Scheme, in accordance with the waste hierarchy, are set out in the OCEMP **[REP1-131]**, OOEMP **[EX4/GH7.2_B]** and ODS **[REP1-135]**.

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Part 5.16 – Water Quality and Resources Paragraph 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.	The OCEMP **[REP1-131]** sets out measures to manage surface water runoff during the construction period, including limiting the discharge of suspended solids. This includes: • Appropriate pollution control measures as agreed with the sewerage undertaker or the Environment Agency as appropriate. • Following the relevant sections of BS 6031: Code of Practice for Earthworks for the general control of site drainage. • Where practical, undertaking earthworks during the drier months of the year. • Topsoil/subsoil will be stored a minimum of 30m from watercourses on flat lying land. Where this not practicable, and it is to be stockpiled for longer than a two-week period, the material will either be covered with geotextile mats, seeded to promote vegetation growth, or runoff prevented from draining to a watercourse without prior treatment; and • Runoff storage areas for the settlement of excessive fine particulates in runoff will be provided.

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Paragraph 5.16.6	Applicants should avoid locating potentially polluting activities in the most sensitive locations for groundwater, in particular Source Protection Zone 1 (SPZ) and close to nationally important drinking water supplies. Applicants should consider implementing protective measures to control the risk of pollution to groundwater, for example, through the use of protective barriers.	The OCEMP **[REP1-131]** details the measures that would be undertaken during construction to mitigate the temporary effects on the water environment. This includes good practice methods which would also focus on managing the risk of pollution to surface waters and the groundwater environment. As set out in the Drainage Strategy for the BESS in Annex J of Appendix 10.11 of ES Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-057]** The BESS area will be lined and outfalls will be controlled by automatically actuated valves, so that fire suppression water is contained.
Paragraph 5.16.7	The ES should in particular describe: • The existing quality of waters affected by the proposed project and the impacts of the proposed project on water quality, noting any relevant existing discharges, proposed new discharges and proposed changes to discharges. • Existing water resources affected by the proposed project and the impacts of the proposed project on water resources, noting any relevant existing abstraction rates, proposed new abstraction rates and proposed changes to abstraction rates (including any impact on or use of mains supplies and reference to Catchment abstraction Management Strategies) and also demonstrate how proposals	Section 10.6 of ES Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]** sets out the baseline conditions of water receptors for all the sites and surrounding areas with regards to water quality, including the existing quality and physical characteristics of waters nearby and potentially affected by the Scheme. The potential impacts of the Scheme on water bodies and protected areas are set out in the Water Framework Directive Assessment [**REP1-155]**.

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	minimise the use of water resources and water consumption in the first instance. • Existing physical characteristics of the water environment (including quantity and dynamics of flow) affected by the proposed project and any impact of physical modifications to these characteristics. • Any impacts of the proposed project on water bodies or protected areas (including shellfish protected areas) under the Water Environment) Water Framework Directive) (England and Wales) Regulations 2017 and source protection zones (SPZs) around potable groundwater abstractions. • How climate change could impact any of the above in the future. • Any cumulative effects.	The Scheme is not located within a Source Protection Zone. The potential impacts of climate change have been incorporated into the assessments set out in ES Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]**.

2.5 National Policy Statement EN-3

Table 5: National Policy Statement for Renewable Energy Infrastructure (EN-3) (December 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Paragraph 1.1.2	Electricity generation from renewable sources is an essential element of the transition to Clean Power 2030 Mission, net zero and meeting our statutory targets for the sixth carbon budget (CB6). Our analysis suggest	As explained in the Statement of Need **[APP-556]**, the Scheme is a substantial infrastructure asset, capable of delivering large amounts of

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	that demand for electricity is likely to increase significantly over the coming years and could more than double by 2050. This could require a fourfold increase in low carbon electricity generation, with most of this likely to come from renewables.	low carbon electricity to help meet the UK's urgent need to decarbonise with solar technology supported by recent government policy. Its proposed National Electricity Transmission System (NETS) connection means that it would play its part in helping National Grid ESO (NGESO) manage the national electricity system to ensure security of supply and bring cost benefits to electricity consumers, both of which are identified in government policy as being required for resilient energy supplies in the future. The meaningful and timely contributions offered by the Scheme to UK decarbonisation and security of supply while helping lower bills for consumers throughout its operational life, will be critical on the path to Net Zero. Without the Scheme, a significant and vital opportunity to develop a large-scale low-carbon generation scheme will have been passed over, increasing materially the risk that future Carbon Budgets and Net Zero 2050 will be achieved.
Part 2.4 Climate change adaptation Paragraph 2.4.11	Solar photovoltaic PV 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	As outlined in Chapter 7: Climate Change of the ES, **[APP-044]** account of the effects of climate change have been taken in the design of the Scheme, and its construction and decommissioning. This includes:

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	• Impact of higher temperatures.	• The effect of projected temperature increases on electrical equipment over the course of the Scheme's design life has been taken into account. Inverters (PV and BESS) will have a cooling system installed to control the temperature and allow the inverters to operate efficiently in warmer conditions. The PV modules and transformers have a wide range of acceptable operating temperatures, and it has been determined that increasing temperatures will not adversely affect their operation. • Any health and safety plans developed for construction and decommissioning activities will be required to account for potential climate change impacts on workers, such as flooding and heatwaves. • The design of drainage systems will ensure that there will be no significant increases in flood risk downstream during storms up to and including the 1 in 100 (1%) annual probability design flood, with an allowance of 20% for climate change. A Decommissioning Environmental Management Plan (DEMP) (taking account of

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		climate change risks at the time) will be prepared prior to decommissioning. An ODS **[REP1-135]** is provided as part of the application, which secures the production of the DEMP. ES Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]** and Flood Risk Assessments in ES Appendices 10.1 to 10.10 **[APP-098 to APP-102, APP-104 to APP-107, REP1-053, REP1-055, REP1-057]** have considered the potential impacts of climate change. As the Site is at predominantly low risk from flooding from all sources, the reasonable 'worst case' is limited to the placement of Solar PV modules and string inverters mounted on the panels within Flood Zone 2 and Flood Zone 3 towards the east of the Site. The residual flood risk will be negligible once mitigation is included.
Section 2.5: Consideration of Good Design for Energy Infrastructure		
Paragraph 2.5.2	Proposals for renewable energy infrastructure should demonstrate good design, particularly in respect of landscape and visual amenity, opportunities for co-existence/co-location with other marine and terrestrial uses, and in the design of the project to mitigate impacts such as noise and effects on ecology and heritage.	As detailed in Section 6.4 of the Planning Statement **[EX4/GH7.15_B],** good design has been a fundamental consideration from the outset of the Scheme.

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		The Project Principles as set out in Concept Design Parameters and Principles **[REP1-151]** 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 opportunities for enhancement and balance the need for flexibility and certainty within the DCO Application. ES Chapter 8: Landscape and Visual Impact **[APP-045]** has informed the iterative design process, including taking account of published landscape character assessment guidance and fieldwork analysis. This is demonstrated in the Design Approach Document **[APP-560]**. The overall objective of the landscape design is to integrate the Scheme into its landscape setting and avoid or minimise adverse landscape and visual effects as far as practicable. The design has been developed in collaboration with the wider design team, other specialists and the Host Authorities' landscape advisors to achieve a solution that achieves this objective whilst maximising opportunities to

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		deliver net gains in biodiversity gain. Accordingly, the landscape design aims to achieve the following: • To integrate the Scheme into the existing landscape pattern as far as possible by retaining and following existing features, including vegetation, where practicable. • To replace vegetation lost because of construction of the Scheme through areas of new planting. • To filter and screen more prominent components of the Scheme in views from visual receptors. Details of the landscape measures embedded into the Scheme design, including a summary of their environmental functions is presented in the OLEMP **[REP1-137]**. 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 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

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		heritage). 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 provide 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.
Section 2.6: Flexibility in the Project Details		
Paragraph 2.6.1 Paragraph 2.6.2	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. Where flexibility is sought in the consent as a result, applicants should, to the best of their knowledge, assess the likely worst case environmental, social and economic effects of the proposed development to ensure that the impacts of the project as it may be constructed have been properly assessed.	The Applicant is seeking flexibility in the Scheme as set out in Section 4.3 in Chapter 4: Scheme Description of the ES **[REP1-031]**. The flexibility is to address uncertainties in the Scheme design and to allow for the most up to date technology possible to be utilised at the time of construction.

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Paragraph 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.	The flexibility is sought by using the 'Rochdale Envelope' approach, which allows assessment of the maximum parameters for the Scheme, while ensuring all potentially significant effects (positive or adverse) are considered. The maximum design scenarios are identified from the range of potential options for each design parameter for the Scheme. The maximum design scenario assessed is therefore the scenario which would give rise to the greatest potential impact. The maximum design scenarios are set out the in the Concept Design Parameters and Principles **[REP1-151]**, which is secured by a Requirement in the draft DCO **[REP3-024]**.
Paragraph 2.10.5 Paragraph 2.10.6	Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation. Solar farms can be built quickly and, coupled with consistent reductions in the cost of materials and improvements in the efficiency of panels, large-scale solar is now viable in some cases to deploy subsidy free.	As explained in the SoN **[APP-556]**, the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to develop a secure, affordable and low carbon electricity generation system which is sufficient to meet future demand. The government expects solar technology to play a major role in delivering of these objectives. This paragraph further emphasises that large-scale development, in particular, is needed to

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		meet the government's objectives. The Scheme directly accords with this.
Paragraph 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 shown in Figure 16 of the SoN **[APP-556]**, the Scheme is proposed to be located in one of the higher solar irradiation areas of the UK. This increases the benefit it will bring to the UK, in relation to the bulk generation of low carbon electricity per MW installed. The SoN **[APP-556]** also concludes that the site is of a size and has topography which meets the requirements of the Scheme to generate significant amounts of electricity and store it.
Paragraph 2.10.12	In order to maximise irradiance, applicants may choose a site and design its layout with variable and diverse panel aspects, and panel arrays may also follow the movement of the sun in order to further maximise the solar resource.	The Scheme, as described in ES Chapter 4: Scheme Description **[REP1-031]**, seeks consent for both tracker panels and fixed panel options within the array Sites. The use and distribution of these across the Sites will be subject to further consideration as part of the detailed design for the Scheme, save for any locations where the use of one type of panel is required as a mitigation measure.
Paragraph 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.	The Scheme proposes to connect to an existing National Grid Substation (Grendon National Grid Substation), which is located on one of the major connections. As explained at Section 4.4 of the SoN **[APP-556]**, by connecting at

Table 5: National Policy Statement for Renewable Energy Infrastructure (EN-3) (December 2025)		
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Paragraph 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.	Grendon Grid Substation, the Scheme is making use of an existing connection point and transmission infrastructure in a way which does not present the risk of overload or congestion on the NETS during any period of foreseen operation, and provides a regional source of locally generated bulk low carbon supplies of electricity to consumers in Northamptonshire and the wider Midlands area. Section 8.2 of the SoN **[APP-556]** discusses this point further and provides additional evidence which underpins Grendon National Grid Substation as an excellent point of connection for the Scheme. The Site Selection Assessment **[REP1-037]** sets out the detailed site selection process undertaken by the Applicant.
Paragraph 2.10.20 Paragraph 2.10.21	Solar is a highly flexible technology and as such can be deployed on a wider variety of land types. 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. Best and Most Versatile agricultural land is defined as land in Grades 1, 2 and 3a of the Agricultural Land Classification (ALC).	Although the majority (65%) of the Order Limits comprises BMV agricultural land, these are justified by particular factors related to their location and context within the Scheme, the wider landholding and in relation to adjacent and surrounding land. Table 5:9: Stage 4 – Design Updates up to DCO Submission of ES Chapter 5: Alternatives and Design Evolution **[APP-042]** sets out the changes made to the Scheme following the detailed ALC Technical Report **[APP-172]** and provides the detailed justification for retaining the areas of BMV for

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		the Scheme as well as an assessment of alternative sites for the Scheme. Other benefits of the Scheme are explained in Section 4 of this Planning Statement **[EX4/GH7.15_B]**. As stipulated by this policy, land type should not be a predominating factor in determining the suitability of the site location.
Paragraph 2.10.22 Paragraph 2.10.23	Whilst the development of ground mounted solar arrays is not prohibited on Best and Most Versatile agricultural land, or sites designated for their natural beauty, or recognised for ecological or archaeological importance, the impacts of such are expected to be considered and are discussed under paragraphs 2.10.67-.84 and 2.10.99-2.10.118 of this NPS. It is recognised that at this scale, it is likely that applicants' developments may use some agricultural and, however, applicants should explain their choice of site, noting the preference for the development to be on suitable brownfield, industrial and low and medium grade agricultural land.	Although 65% of the Order Limits comprises BMV agricultural land, the need for the Scheme to help meet the UK's 2050 net zero carbon obligations. Other benefits of the Scheme are explained in Section 6.18 of the Planning Statement **[EX4/GH7.15_B]**. The Site Selection Assessment **[REP1-037]** explains the choice of site as required by this paragraph and confirms that there are insufficient areas of available non-BMV land without constraints on which to accommodate the entire Scheme.
Paragraph 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 Defra Construction Code. Applicants should refer to Natural England	The ALC Technical Report is provided in Appendix 20.1 of the ES **[APP-172]**. The ALC Technical Report includes baseline information for the Cable Route Corridor, based on desk study information. This is because the

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	guidance, or any successor to it, for more information about the assessment process for development proposals on agricultural land.	development proposed is a buried cable with the interruption of the existing agricultural use limited to the brief cable laying operation. The provision of a detailed Soil Management Plan (building on measures outlined in the Outline Soil Management Plan **[APP-550]**) will ensure the preservation of the soil resource at all the Sites. **ES Chapter 20: Agricultural Circumstances [APP-057]** has given consideration and reference to Natural England's guidance ' Guide to assessing development proposals on agricultural land' (Natural England, 2021).
Paragraph 2.10.27 Paragraph 2.10.28	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. 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.	A Transport Assessment, Appendix 13.1 of the ES **[APP-150]** has been prepared to assess the suitability and impact of the necessary access to the Order limits. This concludes that the Scheme with respect to transport and access is considered to be in accordance with relevant national and local policy and that it avoids any adverse impacts on highway safety or any severe residual cumulative impacts on the road network.
Paragraph 2.10.29	Developers will usually need to construct on site access routes for operation and maintenance activities, such as footpaths, earthworks, or landscaping.	A Transport Assessment, Appendix 13.1 **[APP-150]** of the ES has been prepared to assess the suitability and impact of the necessary access

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Paragraph 2.10.30 Paragraph 2.10.31	In addition, sometimes access routes will need to be constructed to connect solar farms to the public road network. Applications should include the full extent of the access routes for operation and maintenance and their effects.	to the Order limits. This concludes that the Scheme with respect to transport and access is considered to be in accordance with relevant national and local policy and that it avoids any adverse impacts on highway safety or any severe residual cumulative impacts on the road network.
Paragraph 2.10.32 Paragraph 2.10.33 Paragraph 2.10.34 Paragraph 2.10.35 Paragraph 2.10.36	Proposed developments may affect the provision of public rights of way networks. Public rights of way may need to be temporarily closed or diverted to enable construction, however, applicants should keep, as far as is practicable and safe, all public rights of way that cross the proposed development site open during construction and to protect users where a public right of way borders or crosses the site. 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. Applicants are encouraged where possible to minimise the visual impacts of the development for those using existing public rights of way, considering the impact this may have on any other visual amenities in the surrounding landscape. 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	There are several PRoWs within or abutting the Scheme. These are shown Section 4 of the OPRoWMP **[REP1-147]**. The exiting PRoWs are predominantly used for recreational purposes and form part of a wide network of PRoWs in the surrounding area providing residents with alternative routes. As detailed in the OPRoWMP **[REP1-147]**, PRoWs will be kept open throughout all phases of the Scheme, with appropriate safety measures in place. Where diversions cannot be avoided during the construction period, these would be convenient, clearly signed and for as short a duration as is necessary, usually overnight. ES Chapter 8: LVIA **[APP-045]** sets out the mitigation measures to minimise the visual impacts of the Scheme from those using existing rights of way, which include green

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	new public rights of way or the creation of permissive paths) taking into account where appropriate the views of landowners.	infrastructure planting, such as new hedgerows on existing public rights of way.
Paragraph 2.10.37	Applicants should set out detail 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 OPRoWMP **[REP1-147]** is provided as part of this submission which sets how the public rights of way will be managed.
Paragraph 2.10.38 Paragraph 2.10.39	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. 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.	Security measures, including fencing and CCTV are described in Chapter 4: Scheme Description of the ES **[REP1-031]**.and are taken into account in the assessment presented in the ES **[APP-037 to APP-544]**. Details of the site security during the construction and operational stage are also set out in the OCEMP **[REP1-131]** and OOEMP **[EX4/GH7.2_B]** Site security during construction will be managed by the contractor(s). The site security fencing will remain in place throughout the duration of the construction period. Any storage of materials will be kept secure to prevent theft or vandalism. A safe system for accessing the materials storage areas would be implemented by the contractor(s). The Sites will subject several security risk management threat assessments during the development, construction, operation, and ultimately decommissioning phases.

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Paragraph 2.10.55 Paragraph 2.10.56	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. In the case of underground cabling, applicants are expected to provide a method statement describing cable trench design, installation methodology, as well as details of the operation and maintenance regime.	Details of cables, cable trenches and construction methodology are provided in Chapter 4: Scheme Description of the ES **[REP1-031]**. All cables will be buried; there is no requirement for overhead electricity cables to be used or constructed as part of the Scheme. The Concept Design Parameters and Principles Approach Document **[REP1-151]** describes the cable design and installation for each works area for the construction, operational, maintenance and decommissioning phases in accordance with OCEMP **[REP1-131]** and OLEMP **[REP1-137]**
Paragraph 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 they may be socio-economic benefits in retaining site infrastructure after the operational life, such as retaining pathways through the site or a site substation.	Details of the decommissioning phase, including which elements will be decommissioned and which will be retained, are provided in Chapter 4: Scheme Description of the ES **[REP1-031]**. This sets out that the Solar PV Array Works Area and related components, Ancillary Infrastructure, substations and the BESS Compound will be removed and recycled or disposed of in accordance with good practice and market conditions at that time. The underground cable within the Grid Connection Route will be decommissioned in accordance with the applicable guidance and regulations at the time. Currently, the most

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		environmentally acceptable opinion is considered to be leaving the cables in situ. The decommissioning of the Scheme will be addressed within the ODS **[REP1-135]**.
Paragraph 2.10.62 Paragraph 2.10.63	In many cases, not all aspects of the proposal may have been settled in precise detail at the point of application. Such aspects may include: • The type, number and dimensions of the panels; • Layout and spacing; • The type of inverter or transformer; and • Whether storage will be installed (with the option to install further panels as a substitute). Applicants should set out a range of options based on different panel numbers, types and layout, with and without storage.	Chapter 2: EIA Process and Methodology **[APP-039]** and Chapter 4: Scheme Description of the ES **[REP1-031]** explain that the parameters for the project are defined by the Outline Design Principles, which have informed the assessments in the ES **[APP-037 to APP-544]**. The Works Plan **[REP3-008]** and design principles of the Design Approach Document **[APP-560]** define parameters for the Scheme. The approach to flexibility is explained in Chapter 4: Scheme Description of the ES **[REP1-031]**.
Paragraph 2.10.68 Paragraph 2.10.69 Paragraph 2.10.70	The applicant's ecological assessments should identify any ecological risk from developing on the proposed site. Issues that need assessment may include habitats, ground nesting birds, wintering and migratory birds, bats, dormice, reptiles, great crested newts, water voles and badgers. The applicant should use an advising ecologist during the design process to ensure that adverse impacts are avoided, minimised or mitigated in line	Chapter 9: Ecology and Biodiversity of the ES **[REP1-033]** sets out all the protected species, habitats and other species identified as being of principal importance for the conservation of biodiversity within the study area for the Scheme. Chapter 9: Ecology and Biodiversity of the ES **[REP1-033]** clearly sets out the expected effects on the above receptors during the

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Paragraph 2.10.71	with the mitigation hierarchy and biodiversity enhancements are maximised. 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.	construction, operation and decommissioning phases of the Scheme. Additional mitigation measures are proposed during construction to mitigate the impact of breeding birds of open habitats (skylark). These include the provision of compensatory nesting habitats, further details of which are set out in the OLEMP **[REP1-137]**.
Paragraph 2.10.72 Paragraph 2.10.73	Applicants should consider earthworks associated with construction compounds, access roads and cable trenching. 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 above at Paragraphs 2.10.25 and 2.10.26.	Earthworks required for the Scheme are described in Chapter 4: Scheme Description of the ES **[REP1-031]** and are taken into account by assessments in the ES **[APP-037 to APP-544]**. There are minimal earthworks identified for the Scheme. The Cable Route Corridor will require the redistribution and management of soil. An Outline Soil Management plan has been prepared to support the submission **[APP-550]**.
Paragraph 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 in order to minimise impact. If lighting is necessary, it should be minimised and directed away from areas of likely habitat.	Lighting and CCTV required for the Scheme are described in Chapter 4: Scheme Description of the ES **[REP1-031]** and are taken into account by the assessments in the ES **[APP-037 to APP-544]**. The location of this equipment has been carefully considered to minimise impact. Standard good practice measures would be employed to minimise light spill, including glare

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		during construction, operation and decommissioning.
Paragraph 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 **[APP-037 to APP-544]** takes account of all works to boundaries, and any works to hedgerows. Buffers to woodland and hedgerow are included, and proposals for fencing incorporate features to enable the movement of mammals, reptiles and other fauna.
Paragraph 2.10.76 Paragraph 2.10.77 Paragraph 2.10.78 Paragraph 2.10.79 Paragraph 2.10.80	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. 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. 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. Culverting existing watercourses/drainage ditches should be avoided. 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.	Flood Risk Assessments have been provided in **ES Appendices 10.1 to 10.10 [APP-098 to APP-102, APP-104 to APP-107, REP1-053, REP1-055, REP1-057]** Design and mitigation considerations have been set out in ES Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]**. The solar panels will be mounted on raised frames above surrounding ground level allowing flood water to flow freely underneath. Therefore, there will be no loss of floodplain volume as a result of the Scheme. The Scheme is free draining through perimeter gaps around all panels, allowing for infiltration as existing within the grassland/vegetation surrounding and beneath the panel. There will be minimal increase in impermeable area

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		meaning the proposals will not increase surface water flood risk elsewhere. The Scheme has been designed to utilise existing access points and culverts where possible. It is anticipated that the Scheme will require the construction of one new culvert in site Green Hill F. With mitigation, the impact of this has been assessed as neutral and not significant in Table 9.7 of ES Chapter 9: Ecology and Biodiversity **[REP1-033]**.
Paragraph 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 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.	The Scheme has taken advantage of opportunities to conserve and enhance biodiversity and accords with this paragraph. A Biodiversity Net Gain (BNG) assessment, using Defra's Metric 4.0, has been provided with the DCO application **[REP1-043]**. This sets out the significant net gains in biodiversity that the Scheme will provide and considers the North Northamptonshire Local Nature Recovery Strategy
Paragraph 2.10.84	Applicants should consider whether they need to provide geotechnical and hydrological information (such as identifying the presence of peat according to country-specific definitions at each site) including the risk of landslide connected to any development work.	The Applicant does not consider that the nature of the Order limits or the Scheme is such that this information is required.
Paragraph 2.10.89	Applicants should carry out a landscape and visual assessment (LVIA) and report it in the ES. Photomontage visualisations may be required to	An assessment of the potential landscape and visual impacts associated with the construction,

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	demonstrate the effects of a proposed solar farm, on sensitive or valued landscapes, particularly designated landscapes, the setting of heritage assets and any nearby residential areas or viewpoints.	operation and decommissioning of the Scheme has been carried out and is presented in Chapter 8: Landscape and Visual Impact of the ES **[APP-045]**. Visualisations of the Scheme are set out in ES Figures 8.14.1 Viewpoint 1 Photography to ES Figures 8.14.NN13 Photography and Photomontages **[APP-334-APP-346].** These 26 visualisations show Year 1 and Year 15, with five of the 26 showing Year 60.
Paragraph 2.10.90 Paragraph 2.10.91	Applicants should follow the criteria for good design set out in Section 4.6 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. 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).	Good design has been a key consideration from the outset. Chapter 8: Landscape and Visual Impact **[APP-045]** has informed the iterative design process, including taking account of published landscape character assessment guidance and fieldwork analysis. ES Chapter 8: Landscape and Visual Impact **[APP-045]** confirms that the Scheme has no impact on nationally designated landscapes. The overall objective of the landscape design is to integrate the Scheme into its landscape setting and avoid or minimise adverse landscape and visual effects as far as practicable. The design has been developed in collaboration with the wider design team, other specialists and the Host Authorities landscape

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		advisors to achieve a solution that achieves this objective whilst maximising opportunities to deliver net gains in biodiversity gain. Accordingly, the landscape design aims to achieve the following: • To integrate the Scheme into the existing landscape patterns as far as possible by retaining and following existing features, including vegetation, where practicable. • To replace vegetation lost because of construction of the Scheme through new areas of planting. • To filter and screen more prominent components of the Scheme in views from visual receptors. Details of the landscape measures embedded in to the Scheme design, including a summary of their environmental functions, is presented in the OLEMP **[REP1-137]**. Refer also to the Landscape and Ecology Mitigation Plans **[REP3-042, REP3-044, APP-209, REP3-046, APP-211, REP3-048, REP3-050, APP-214, APP-215, REP3-052, APP-217, REP3-054, APP-219]**.

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Paragraph 2.10.92 Paragraph 2.10.93	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. The impact of the proposed development on established trees and hedges should be informed by a tree survey and arboricultural/hedge assessment as appropriate.	Refer to the Landscape and Ecology Mitigation and Plans, which are shown in Figures 4.10-4.20 **[REP3-042, REP3-044, APP-209, REP3-046, APP-211, REP3-048, REP3-050, APP-214, APP-215, REP3-052, APP-217, REP3-054, APP-219]**. The Landscape and Ecology Mitigation measures illustrate the use of extensive landscape mitigation to screen the screen the Scheme from sensitive views. Site fencing has been proposed in proximity to existing hedgerows to allow the hedgerows to grow into the fencing to screen it where possible. This approach is secured through the OLEMP **[REP1-137]** with the management of existing and proposed hedgerows prescribed in this document. The submission is accompanied by a Tree Survey Schedule **[APP-170]**, Arboricultural Impact Assessment and Outline Arboricultural Method Statement **[APP-171]** and a Preliminary Ecological Appraisal **[APP-084]**.
Paragraph 2.10.95	Applicants should map receptors to qualitatively identify potential glint and glare issues and determine if a glint and glare assessment is necessary as part of the application.	The ES Chapter 15: Glint and Glare **[APP-052]** confirms that the glint and glare effects of the Scheme have been shown not to be significant in EIA terms.

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Paragraph 2.10.97 Paragraph 2.10.98	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. 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.	Despite this, an Aviation Specialist was consulted to determine the impact of the Scheme on the William Pitt Airstrip and Sywell Aerodrome, set out in the Empirical Evidence on Glint and Glare from Solar PV Installations Near UK Aerodromes **[APP-572]**. This analyses existing solar farms around solar farms and demonstrates that modelled impacts from solar farms do not occur in practice and therefore, no additional mitigation is proposed.
Paragraph 2.10.99 Paragraph 2.10.100 Paragraph 2.10.101 Paragraph 2.10.102	The impacts of solar PV developments on the historic environment will require expert assessments in most cases and may have effect both above and below ground. 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. 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. Equally solar PV developments may have a positive effect, for example, heritage assets may be protected by a solar PV arm as the site is removed from regular ploughing and shoes or low-level piling is stipulated.	Heritage assets as defined in this policy have been considered and, where relevant, assessed in Chapter 12: Cultural Heritage of the ES **[APP-049]**. Section 12.8 of Chapter 12: Cultural Heritage of the ES **[APP-049]** assess the impacts and effects on heritage assets. Archaeological evaluations were undertaken to in addition to a desk-based assessment, including a geophysical survey (detailed magnetometry) of the whole scheme and targeted trial trenching. The ES **[APP-037-APP-544]** has therefore identified a suitable baseline from which to assess the Scheme in relation to this policy**.**

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Paragraph 2.10.104 Paragraph 2.10.105	Applicant assessments should be informed by information from Historic Environment Record (HERs) or the local authority. 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.	The assessment set out in Chapter 12: Cultural Heritage of the ES **[APP-049]** has been informed by the HER and in consultation with the relevant Councils Scope and methodology for the archaeological investigation for each area of the Scheme has been agreed with and submitted to the relevant Councils prior to the work being undertaken. The Councils have also been kept updated with any relevant findings and issues. The details of the archaeological investigation work and mitigation measures are set out in Chapter 12 Cultural Heritage of the ES **[APP-049].**
Paragraph 2.10.106 Paragraph 2.10.107	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 heritage assets. The extent of investigative work should be proportionate to the sensitivity of, and extent of proposed ground disturbance in, the associated study area.	Archaeological evaluations were undertaken to in addition to a desk-based assessment, including a geophysical survey (detailed magnetometry) of the whole scheme and targeted trial trenching. The scope and specification of each field investigation have been set out in the Archaeological Evaluation Trenching Reports **[EX4/GH6.3.12.6_A]** and Archaeological Mitigation WSI **[APP-147]**. The results of these surveys (Appendices 12.2 **[APP-121]** and 12.6 **[EX4/GH6.3.12.6_A]**) have been incorporated in Section 12.8 of Chapter 12: Cultural Heritage of the ES **[APP-049]**.

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Paragraph 2.10.108 Paragraph 2.10.109	Applicants should take account of the results of historic environment assessments in their design proposal. 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.	Section 12.7 of Chapter 12: Cultural Heritage of the ES **[APP-049]** outlines the mitigation measures embedded within the scheme design pertaining to cultural heritage. This includes the provision of stand-offs between the Scheme and heritage assets in order to help to preserve their setting during the construction, operational and decommissioning periods. Appropriate and sensitive screening has also been developed and implemented to minimise the visual intrusion of the Scheme, while avoiding obscuring or intruding upon key views and relationships between heritage assets.
Paragraph 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.	Chapter 12 Cultural Heritage **[APP-049]** of the ES has carefully assessed the impact of the Scheme on heritage assets (above and below ground) and their setting. There are no designated or non-designated heritage assets within the Order Limits. Within the wider, the following heritage assets have been scoped into the assessment: 4 Conservation Areas, 69 Listed Buildings, one Registered Parks and Garden, one Scheduled Monument, and 24 non-designated heritage assets.

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		Chapter 12 Cultural Heritage **[APP-049]** of the ES indicates that during the construction stage most of the identified impacts to heritage assets would be **not significant**, with effects mostly ranging between **Neutral** and **Minor/Moderate Adverse** and during the operational stage no significant effects were identified to Historic Landscape Character parcels during the operation phase Within each of the 9 Sites and within the Cable Route Corridor, non-designated archaeological assets and historic landscape character units have been identified. The cable route is proposed to be buried underground. As such any construction phase impacts to the setting of heritage assets as a result of the installation of the cable route would be temporary.
Paragraph 2.10.112 Paragraph 2.10.113	Modern solar farms are large sites that are mainly comprised of small structures that can be transported separately and constructed on-site, with developers designating a compound on-site for the delivery and assemblage of necessary components. Many solar farms will be sited in areas served by a minor road network. Public perception of the construction phase of solar farms will derive mainly from the effects of traffic movements, which is likely to involve	An OCTMP **[REP3-064]** is provided as part of the submission. This sets out the proposals to manage construction traffic and staff vehicles during the construction of the Scheme. It identifies the management of freight traffic i.e., HGVs to and from the designated construction compounds, as well as staff vehicles. The CTMP has been informed by extensive consultation with National Highways, West

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	smaller vehicles than typical onshore energy infrastructure but may be more voluminous	Northamptonshire, North Northamptonshire and Milton Keynes Highways.
Paragraph 2.10.115 Paragraph 2.10.116	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. 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.	An OCTMP **[REP3-064]** is provided as part of the submission. This sets out the proposals to manage construction traffic and staff vehicles during the construction of the Scheme. It identifies the management of freight traffic i.e., HGVs to and from the designated construction compounds, as well as staff vehicles. The OCTMP has been informed by extensive consultation with National Highways, West Northamptonshire, North Northamptonshire and Milton Keyes Highways.
Paragraph 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.	As stated in the Transport Assessment, provided in Appendix 13.1 of the ES **[APP-150]**, a total of 47 access points across the Scheme are proposed for construction and operation of the Sites, Cable Corridor and Cable Construction Compounds. The majority of the access points will be improved existing field accesses. All have been assessed and designed for their appropriateness for the relevant vehicles that will utilise them. An OCTMP **[REP3-064]** is provided as part of the submission. This sets out the proposals to manage construction traffic and staff vehicles during the construction of the Scheme. It

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		identifies the management of freight traffic i.e., HGVs to and from the designated construction compounds, as well as staff vehicles. The OCTMP has been informed by extensive consultation with West Northamptonshire, North Northamptonshire and Milton Keynes Councils and National Highways. For abnormal loads, specialist contractor Wynns have prepared a report detailing the requirement movements which has been prepared in consultation with the relevant Councils. The movement of large (abnormal) loads is regulated by National Highways and will be subject to separate agreement with the relevant highway authorities and police through the Electronic Service Delivery for Abnormal Loads (ESDAL) system. A specific assessment of abnormal loads has been undertaken as part of the Transport Assessment. Appropriate routes for abnormal load movements and mitigation strategies to secure safe passage have been identified. This is shown in Appendix F of the Transport Assessment **[APP-150].**
Paragraph 2.10.118	Where a cumulative impact is likely because multiple energy infrastructure developments are proposed 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	Cumulative schemes for consideration have been agreed in consultation with West Northamptonshire, North Northamptonshire, Milton Keynes and National Highways and have

Table 5: National Policy Statement for Renewable Energy Infrastructure (EN-3) (December 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	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.	been considered in the ES. These are detailed in Section 13.13 of Chapter 13: Transport and Access of the ES **[REP2-003]**. Chapter 13: Transport and Access of the ES **[REP2-003]** concludes that the transport and access impacts of the Scheme are not significant in EIA terms.
Paragraph 2.10.120 Paragraph 2.10.121 Paragraph 2.10.122	In England, proposed enhancements should take account of the above factors and as set out in Sections 4.6 and 5.5 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. This might include maintaining or extending existing habitats and potentially creating new important habitats, for example, by installing cultivated strips/plots for rare arable plants, rough grassland margins, bumble bee plant mixes, and wild bird seed mixes. 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 Biodiversity Net Gain (BNG) assessment, using Defra's Metric 4.0, has been provided with the DCO application **[REP1-043].** This sets out the significant net gains in biodiversity that the Scheme will provide. The Scheme has taken advantage of opportunities to conserve and enhance biodiversity and accords with this policy.
Paragraph 2.10.123	Applicants should consider the potential to mitigate landscape and visual impacts through, for example, screening with native hedges, trees and woodlands.	Refer to the Landscape and Ecology Mitigation Plans **[REP3-042, REP3-044, APP-209, REP3-046, APP-211, REP3-048, REP3-050, APP-214, APP-215, REP3-052, APP-217, REP3-**

Table 5: National Policy Statement for Renewable Energy Infrastructure (EN-3) (December 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Paragraph 2.10.124 Paragraph 2.10.125	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. 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.	**054, APP-219]**, which are shown in Figures 4.10-4.20 of the ES. The Landscape and Ecology Mitigation Plans **[REP3-042, REP3-044, APP-209, REP3-046, APP-211, REP3-048, REP3-050, APP-214, APP-215, REP3-052, APP-217, REP3-054, APP-219]** illustrate the use of extensive landscape mitigation to screen the Scheme from sensitive views. Site fencing has been proposed in proximity to existing hedgerows to allow the hedgerows to grow into the fencing to screen it where possible. This approach is secured through the OLEMP **[REP1-137]** with the management of existing and proposed hedgerows prescribed in this document. Details of operational lighting are set out by Chapter 4: Scheme Description of the ES **[REP1-031]**. During the operational phase, lighting is not required within the Solar Arrays. Motion sensing security lighting will be provided within substations and within the BESS, only to be used for maintenance and security purposes. Temporary site lighting will be required during construction and decommissioning to enable safe working practices and will be designed as

Table 5: National Policy Statement for Renewable Energy Infrastructure (EN-3) (December 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		far as reasonably practical to minimise the potential for light spillage.
Paragraph 2.10.126	Applicants should consider using, and in some cases the Secretary of State may require, solar panels to comprise (or be covered) with anti-glare/anti-reflective coating with a specified angle of maximum reflection attenuation for the lifetime of the permission.	Chapter 4: Scheme Description of the ES **[REP1-031]** sets out that the Solar PV panels will consist of a series of photovoltaic cells beneath a layer of toughed glass. ES Chapter 15: Glint and Glare **[APP-052]** considers both fixed and tracker panel options as either type of panel may constitute the worst-case scenario.
Paragraph 2.10.129 Paragraph 2.10.130	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. 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 discovering of previously unknown archaeology, arise.	The final layout of the components of the Scheme is required to be within the Works Areas identified by the Works Plan **[REP3-008]** and within the Design Approach Document **[APP-560]**. These enable micrositing. The approach to flexibility is explained in Chapter 4: Scheme Description of the ES **[REP1-031]**
Paragraph 2.10.131	In some cases, the local highway authority may request that the Secretary of State impose controls on the number of vehicles movements to and from the solar farm site in a specified period during its construction and, possibly, on the routeing of such movements particularly by heavy vehicles.	As stated in the Transport Assessment, provided in Appendix 13.1 of the ES **[APP-150]**, as agreed with West Northamptonshire, North Northamptonshire, Milton Keynes and National Highways, construction HGVs will travel to/from the Site via agreed routes to ensure that the

Table 5: National Policy Statement for Renewable Energy Infrastructure (EN-3) (December 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Paragraph 2.10.132	Where the Secretary of State agrees that it is necessary, requirements could be imposed on development consent.	effects of the temporary construction phase on the highway network are minimised. A vehicle routing plan showing the agreed routing strategy for HGVs is contained with the CTMP **[REP3-064]**.
Paragraph 2.10.133 Paragraph 2.10.134	Where cumulative impacts 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. 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.	Cumulative schemes for consideration have been agreed in consultation with West Northamptonshire, North Northamptonshire, Milton Keynes and National Highways and have been considered in the ES. These are detailed in Section 13.13 of Chapter 13: Transport and Access of the ES **[REP2-003]**. Chapter 13: Transport and Access of the ES **[REP2-003]** concludes that no cumulative impacts upon the highway network are envisaged based on the assessment in the ES. There would be no cumulative significant adverse effect on transport and access on any or part of the Study Area.
Paragraph 2.10.135	Once consent for a scheme has been granted, applicants should liaise with the relevant local high 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. Further, it may be appropriate for any non-permanent highway improvements carried out for the development (such as temporary road	An OCTMP) **[REP3-064]** is provided as part of the submission. This sets out the proposals to manage construction traffic and staff vehicles during the construction of the Scheme. It identifies the management of freight traffic i.e., HGVs to and from the designated construction compounds, as well as staff vehicles. The

Table 5: National Policy Statement for Renewable Energy Infrastructure (EN-3) (December 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Paragraph 2.10.136	widening) to be made available for use by other subsequent solar farm developments.	OCTMP has been informed by extensive consultation with National Highways, West Northamptonshire, North Northamptonshire and Milton Keynes Highways. It includes proposals for the Scheme's Transport Coordinator to liaise as appropriate with local transport and traffic groups, local planning authorities, local highway authorities and National Highways.
Paragraph 2.10.139 Paragraph 2.10.140 Paragraph 2.10.141	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. Such a requirement should also secure the decommissioning of the generating of the generating station after the expiration of its permitted operation to ensure that inoperative plant is removed after its operational life. An upper limit of 40 years is typical, although applicants may seek consent without a time period or for differing time periods for operation.	The Scheme will be decommissioned at the end of its operational life in accordance with the ODS **[REP1-135]**. The Applicant has committed to a maximum operational life of the Scheme of no more than 60 years as set out in ES Chapter 4: Scheme Description **[REP1-031]**.
Paragraph 2.10.142 Paragraph 2.10.143	The time limited nature of the solar farm, where a time limit is sought as a condition of consent, is likely to be an important consideration for the Secretary of State. The 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	The Scheme will be decommissioned at the end of its operational life in accordance with an ODS **[REP1-135].** The Applicant has committed to a maximum operational life of the Scheme of no more than 60 years as set out in ES Chapter 4: Scheme Description **[REP1-031]**.

Table 5: National Policy Statement for Renewable Energy Infrastructure (EN-3) (December 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	landscape and visual effects and potential effects on the settings of heritage assets and nationally designated landscapes.	The assessments of the ES **[APP-037-APP-544]**. have taken account of this. Chapter 4: Scheme Description of the ES **[REP1-031]** describes in detail how the Order limits would be left on completion of decommissioning.
Paragraph 2.10.146 Paragraph 2.10.147	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 ecosystems services value in the form of drainage, flood attenuation, natural wetland habitat, and water quality management. The Secretary of State must consider the worst-case effects in its consideration of the application and consent.	An assessment of the potential hydrology impacts of the scheme is provided in ES Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]**. This is supported by Flood Risk Assessments in ES Appendices 10.1 to 10.10 **[APP-098 to APP-102, APP-103 to APP-107, REP1-053, REP1-055, REP1-057]**.
Paragraph 2.10.149	The Secretary of State will consider the landscape and visual impact of any proposed PV farm, taking account of any sensitive visual receptors, and the effect of the development on landscape character, together will the possible cumulative effect with any existing or proposed development. Nationally designated landscapes and their settings (National Parks, The Broads and National Landscapes) are afforded extra protection due to their statutory purpose. Development in these areas needs to satisfy policy as set out in EN-1 Section 5.10.	The Scheme complies with this requirement through the provision of and Landscape and Visual Chapter within the ES **[APP-045]**. The impacts on landscape and visual amenity have influenced the iterative design of the Scheme. The proposals have considered the need to mitigate landscape and visual impacts. Details of the included within Chapter 8: Landscape and Visual Impact **[APP-045]** and the OLEMP **[REP1-137]**. ES Chapter 8: Landscape and Visual Impact **[APP-045]** confirms that there is no impact on

Table 5: National Policy Statement for Renewable Energy Infrastructure (EN-3) (December 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		nationally designated landscapes due to the Scheme.
Paragraph 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).	ES Chapter 15: Glint and Glare **[APP-052]** has been provided as part of this submission. The ES Chapter 15: Glint and Glare **[APP-052]** confirms that the glint and glare impacts of the Scheme have been shown not to be significant in EIA terms.
Paragraph 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.	ES Chapter 15: Glint and Glare **[APP-052]** has been provided as part of this submission. The ES Chapter 15: Glint and Glare **[APP-052]** confirms that the glint and glare impacts of the Scheme have been shown not to be significant in EIA terms.
Paragraph 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.	The operational lifetime of the Scheme is a maximum of 60 years. However, if equipment is still operating successfully and safely, the developer may choose to operate beyond the Scheme's design life. This is a common occurrence for generating station; many stations operate beyond the design life if they are well maintained. The Applicant has committed to decommission the Scheme no later than 60 years of operation and it will be decommissioned in accordance

Table 5: National Policy Statement for Renewable Energy Infrastructure (EN-3) (December 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		with the ODS **[REP1-135]** after the end of the operational phase.

2.6 National Policy Statement EN-5

Table 6: National Policy Statement EN-5 (December 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Paragraph 1.1.1	The security and reliability of the UK's current and future energy supply is highly dependent on having an electricity network, which will enable the new electricity generation, storage and interconnection infrastructure that our country needs to meet the rapid increase in electricity demand required to transition to Clean Power by 2030 and net zero, while maintaining energy security.	As explained in the Statement of Need **[APP-556]**, the meaningful and timely contributions offered by the Scheme to UK decarbonisation and security of supply, while helping lower bills for consumers throughout its operational life, will be critical on the path to Net Zero. Without the scheme, a significant and vital opportunity to develop a large-scale low-carbon generation scheme will have been passed over, increasing materially the risk that future Carbon Budgets and Net Zero 2050 will not be achieved.
Paragraph 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 Section 2.4 and Section 2.10.	Chapter 5: Alternatives and Design Evolution of the ES **[APP-042]** sets out the alternative designs that have been assessed by the Applicant in developing the submitted siting and design of the Scheme.

Table 6: National Policy Statement EN-5 (December 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Paragraph 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.	It takes account of environmental, social and economic issues to determine the preferred location of the Scheme.
Paragraph 2.2.8 Paragraph 2.2.9	There will usually be a degree of flexibility in the location of the development's associated infrastructure such as substations, and the applicants should consider carefully their location, as well as their design. 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).	Chapter 5: Alternatives and Design Evolution of the ES **[APP-042]** and the Site Selection Assessment **[REP1-037]** provide details as to methodology and determination of the preferred options for the onsite substations. It has taken into account technical feasibility and environmental constraints of each location. The Grid Connection Statement **[APP-557]** provides more explanation as to why the substation locations were chosen.
Paragraph 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.	There are no nationally designated landscapes within the Order Limits, including National Landscapes.
Paragraph 2.3.1	Section 4.10 of EN-1 sets out the generic considerations that applicants and the Secretary of State should take into account in order to ensure that electricity networks infrastructure is resilient to the effects of climate change.	Consideration has been given to incorporating nature-based climate change adaption into Scheme, and proposals for SuDS have been included, as outlined within the OOEMP **[EX4/GH7.2_B]** and the Landscape and

Table 6: National Policy Statement EN-5 (December 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Paragraph 2.3.2	As climate change is likely to increase risk 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.	Ecology Mitigation Plans **[REP3-042, REP3-044, APP-209, REP3-046, APP-211, REP3-048, REP3-050, APP-214, APP-215, REP3-052, APP-217, REP3-054, APP-219].**
Paragraph 2.3.3	Section 4.10 of EN-1 advises that the resilience of the project to the effects of climate change must be assessed in the Environmental Statement (ES) accompanying an application. For example, future increased risk of flooding would be covered in any flood risk assessment (See Section 5.8 in EN-1). Consideration should also be given to coastal change (see Sections 5.6 in EN-1).	Chapter 7: Climate Change of the ES **[APP-044]** assesses the Scheme in relation to its effects on climate and its resilience to climate change. Flood Risk Assessments (FRA) are provided at Appendices 10.1-10.10 of the ES **[APP-098 to APP-107, REP1-053, REP1-055, REP1-057]**. The FRA provides a detailed assessment of the

Table 6: National Policy Statement EN-5 (December 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		risk of flooding to and from the Scheme (taking account of climate change) and concludes that the risk of flooding will not be increased as a result of the construction, operation or decommissioning of the Scheme. It is therefore considered that the Scheme is compliant with this policy.
Paragraph 2.4.1 Paragraph 2.4.2 Paragraph 2.4.3	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. Applicants should consider the criteria for good design set out in EN-1 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. 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 the infrastructure.	The Design Approach Document **[APP-560]** details the iterative process and how the Scheme design has been developed. The Site Selection Assessment **[REP1-037]** details the stages and methodology used in the assessment for determining the site selection process. The wider impacts of the Scheme have been captured, detailed, assessed, and mitigated for (where possible) through the production of the ES **[APP-037 to APP-544]**.
Paragraph 2.5.1	When planning and evaluating the proposed development's contribution to environmental and biodiversity net gain, it will be important – for both the applicant and the Secretary of State – to supplement the generic guidance set out in EN-1 (Section 4.6) with recognition that the linear nature of electricity networks infrastructure can allow for excellent opportunities to:	A Biodiversity Net Gain (BNG) Assessment, using Defra's Metric 4.0 has been provided within the DCO application **[REP1-043]**. This sets out the significant net gains in biodiversity that the Scheme will provide.

Table 6: National Policy Statement EN-5 (December 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	• Reconnect important habitats via green corridors, biodiversity stepping zones, and reestablishment of appropriate hedgerows; and/or • Connect people to the environment, for instance via footpaths and cycleways constructed in tandem with environmental enhancements.	The Scheme has taken advantage of opportunities to conserve and enhance biodiversity and accords with this policy. The Scheme has therefore incorporated improvements in biodiversity and accords with this policy. See also Section 6.9 of the Planning Statement **[EX4/GH7.15_B]** for further detail on the biodiversity measures incorporated and compliance with planning policy.
Paragraph 2.6.2 Paragraph 2.6.3 Paragraph 2.6.5	Where the applicant does not own or wish to own the land in question, it should try to reach a voluntary agreement giving it sufficient rights and/or permissions to undertake the relevant work. As last resort, where it does not succeed in reaching the agreement that it requires, the network company may, as part of its application to the Secretary of State, seek to acquire rights compulsorily over the land in question by means of a provision in the DCO. The applicant may also seek the compulsory acquisition of land. This will not normally be necessary where lines and cables are installed but may be sought where other forms of electricity networks infrastructure (such as new substations) are required.	As set out in the Statement of Reasons **[APP-019]**, the compulsory acquisition powers sought in the draft DCO are proportionate and no more than is reasonably necessary. All reasonable alternatives to compulsory acquisition have been explored. Given the national and local need for the Scheme and the support in National Policy Statements, compulsory acquisition of the land and rights and the temporary use of land is justified.
Paragraph 2.7.1	EN-1 explains that the Planning Act 2008 aims to create a holistic planning regime, such that the cumulative effects of the same project can be considered together. Co-ordinated applications typically bring economic efficiencies and reduced environmental impact.	The Scheme's full description of development is set out in Chapter 4: Scheme Description of the ES **[REP1-031]**. The ES **[APP-037-APP-544]** has analysed the Scheme, considering the

Table 6: National Policy Statement EN-5 (December 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		effects from the development, including cumulative impacts.
Paragraph 2.9.9	New substations, sealing and 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.	ES Chapter 8: Landscape and Visual Impact **[APP-045]** has been provided as part of this submission. ES Chapter 8: Landscape and Visual Impact **[APP-045]** has informed the iterative design process, including taking account of published landscape character assessment guidance and fieldwork analysis. The overall objective of the landscape design is to integrate the Scheme into its landscape setting and avoid or minimise adverse landscape and visual effects as far as practicable. The design has been developed in collaboration with the wider design team, other specialists and the Host Authorities' landscape advisors to achieve a solution that achieves this objective whilst maximising opportunities to deliver net gains in biodiversity gain. Accordingly, the landscape design aims to achieve the following: • To integrate the Scheme, including substations, into the existing landscape pattern as far as possible by retaining and

Table 6: National Policy Statement EN-5 (December 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		following existing features, including vegetation, where practicable. • To replace vegetation lost because of construction of the Scheme through areas of new planting. • To filter and screen more prominent components of the Scheme, including substations, in views from visual receptors. Details of the landscape measures embedded into the Scheme design, including a summary of their environmental functions is presented in the OLEMP **[REP1-137]**.
Paragraph 2.9.38 Paragraph 2.9.39 Paragraph 2.9.40	Audible noise effects can also arise from substation equipment such as transformers, quadrature boosters and mechanically switched capacitors. 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 engineering intentionally or provided by other structures). For the assessment of noise from substations, standard methods of assessment and interpretation using the principles of the relevant British Standards are satisfactory.	Chapter 14: Noise and Vibration of the ES **[APP-051]** assesses the construction, operation and decommissioning of the Scheme in relation to noise. It concludes that there are no significant effects arising from noise generating equipment during the construction, operation and decommissioning phases. The Scheme submission is also supported by an OCEMP **[REP1-131]**, OOEMP **[EX4/GH7.2_B]** and ODS **[REP1-135]**, which set out mitigation measures to reduce noise effects during each phase of the Scheme**.**

2.7 National Planning Policy Framework

Table 7: National Planning Policy Framework (December 2024)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
1, Introduction, paragraph 5	The Framework does not contain specific policies for nationally significant infrastructure projects. These are determined in accordance with the decision-making framework in the Planning Act 2008 (as amended) and relevant national policy statements for major infrastructure, as well as any other matters that are relevant (which may include the National Planning Policy Framework). National policy statements form part of the overall framework of national planning policy, and may be a material consideration in preparing plans and making decisions on planning applications.	The NPPF is considered to be important and relevant where policies are applicable to the Scheme but is to be given less weight in the SoS's decision making process than the relevant policies in the adopted Energy NPSs. Applicable policies within the NPPF to the Environmental Statement have been identified in the respective chapters.
2, Achieving sustainable development, paragraph 7	The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs[4]. At a similarly high level, members of the United Nations – including the United Kingdom – have agreed to pursue the 17 Global Goals for Sustainable Development in the period to 2030. These	The Scheme will deliver wider sustainability benefits, being a renewable energy development that will make a substantial contribution to the country achieving net-zero carbon emissions. Chapter 7: Climate Change of the ES **[APP-044]** presents a lifecycle greenhouse gas (GHG) impact assessment, which considers the impact of GHG emissions arising over the lifetime of the Scheme on the climate. ES Chapter 7: Climate Change **[APP-044]** presents a greenhouse gas (GHG) assessment over the lifetime of the Scheme. It concludes

Table 7: National Planning Policy Framework (December 2024)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	address social progress, economic well-being and environmental protection[5].	that renewable energy generation from the Scheme during the first year of operation is estimated to be around 670,000 MWh/year if tracker panels are used and around 620,000 MWh/year if fixed panels are implemented. This will reduce gradually through degradation to 576,000 MWh and in the final year reduce to 533,107 MWH. The total energy generation from the proposed 60-year operational life is approximately 34.35TWh. Accounting for the estimated construction phase and operation phase emissions, the Scheme's total carbon intensity value is 43.90 – 47.44 gCO_2e/kWh (for trackers panels and fixed panels respectively). By generating low carbon electricity at a low marginal cost, large-scale solar power reduces the energy generated by more expensive and more carbon intensive forms of generation. The Scheme will therefore help to decarbonise the electricity system and lowers the market price of electricity. From an environmental perspective, Chapter 9: Biodiversity of the ES **[REP1-033]** outlines how the Applicant has sought to protect and enhance the natural environment as far as practical. The Applicant's assessment and application of the mitigation hierarchy for the Scheme has mitigated residual adverse effects

Table 7: National Planning Policy Framework (December 2024)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		to a level which is no greater than adverse at the local level but not significant in EIA terms.
14, Meeting the challenges of climate change, flooding and coastal change, paragraph 161	The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.	As set out in Section 6.8 of the Planning Statement **[EX4/GH7.15_B]**, the Scheme will deliver wider sustainability benefits, being a renewable energy development that will make a substantial contribution to the country achieving net zero carbon emissions. This should be read alongside Chapter 10 Hydrology, Flood Risk and Drainage **[REP1-023].** Section 7.7 of Chapter 7: Climate Change of the ES **[REP1-023]** sets out the climate change resilience mitigation measures embedded into the Scheme to mitigate the impacts on and adapt to climate change. **ES Chapter 10:** Hydrology, Flood Risk and Drainage **[REP1-023]** sets out how flood risk relating to the Scheme is managed and mitigated in conformity with local policies. Flood Risk Assessments (FRA) are provided at **ES Appendices 10.1 to 10.10 [APP-098 to APP-107, REP1-053, REP1-055]**. The FRA provides a detailed assessment of the risk of flooding to and from the Scheme (taking account of climate change) and concludes that the risk of flooding will not be increased as a result of the construction, operation or decommissioning of the Scheme.

Table 7: National Planning Policy Framework (December 2024)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		A Sequential Test and an Exception Test have been provided as Appendix B of the Planning Statement **[EX4/GH7.15_B]**. The Applicant considers that the Scheme passes the Sequential Test requirements. Given that the Scheme falls within areas of Flood Zone 3, the Scheme has been subject to the Exception Test. It has been concluded that the Scheme meets the requirements of the Exception Test.
14, Meeting the challenges of climate change, flooding and coastal change, paragraph 165	To help increase the use and supply of renewable and low carbon energy and heat, plans should: a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, and their future re-powering and life extension, while ensuring that adverse impacts are addressed appropriately (including cumulative landscape and visual impacts); b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co- locating potential heat customers and suppliers.	As set out in Section 6.8 of the Planning Statement **[EX4/GH7.15_B]**, the Scheme will deliver wider sustainability benefits, being a renewable energy development that will make a substantial contribution to the country achieving net zero carbon emissions. This should be read alongside Chapter 10 Hydrology, Flood Risk and Drainage of the ES **[REP1-023].** Chapter 7: Climate Change of the ES **[APP-044]** presents a lifecycle greenhouse gas (GHG) impact assessment, which considers the impact of GHG emissions arising over the lifetime of the Scheme on the climate. Chapter 2: EIA Process and Methodology **[APP-039]** and Chapter 4: Scheme Description of the ES **[REP1-031]** explain that the parameters for the project are defined by the Outline Design Principles, which have informed

Table 7: National Planning Policy Framework (December 2024)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		the assessments in the **ES [APP-037-APP-544]**.

2.8 NSIP Action Plan

Table 8: NSIP Action Plan (February 2023)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Paragraph 3.4.10	Nationally Significant Infrastructure: action plan for reforms to the planning process published in February 2023, sets out an extensive plan to reform the planning process for nationally significant infrastructure projects (NSIPS). The actions, grouped under, give broad reform areas: setting a clear strategic direction, bringing forward operational reforms to support faster consenting, realising better outcomes for the environment, recognising the role of local authorities and strengthening community engagement with NSIPs and improving system wide capacity and capability.	It is considered that the proposed changes to the NSIP Action Plan does not alter the assessment of the Scheme presented in the Planning Statement **[EX4/GH7.15_B]**. As this was published by a previous Government and the new Labour Government has recently published a Planning Reform Working Paper: Streamlining Infrastructure Planning (January 2025). This NSIP Action Plan (February 2023) should be given limited weight at this stage.

2.9 Powering Up Britain Energy Security Plan (March 2023)

Table 9: Powering Up Britain Energy Security Plan (updated April 2023)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Page 37	The UK has huge deployment potential for solar power, and we are aiming for 70 gigawatts of ground and rooftop capacity together by 2035. This amounts to a fivefold increase on current installed capacity. We need to maximise deployment of both types of solar to achieve our overall target.	Section 4 of the Planning Statement **[EX4/GH7.15_B]** sets out how the Scheme will meet the compelling need for renewable energy in accordance with relevant national planning policies. In summary, the Scheme would: • Deliver a large amount of renewable generation capacity (34.35TWh over the estimated 60 year assessed lifetime) to deliver the government's energy objectives and legally binding net zero commitments in line with paragraph 1.1.2 of NPS EN-3 and 3.3.20 of NPS EN-1. • Deliver a reduction of between 186,306 and 50,811 tCO2e over the lifetime of the Scheme compared with if it did not go ahead which would make a significant contribution towards reducing carbon emissions as required by paragraph 1.1.2 of NPS EN-3 and paragraph 2.2.1 of NPS EN-1. • Deliver in a timescale that is short in the context of the delivery of other forms of energy generation in line with the urgent need to decarbonise set out in paragraphs 2.2.1-2.3.7 of NPS EN-1; and • Help ensure security and reliability of energy supply in line with Paragraphs 2.3.2 and 2.3.9 of NPS EN-1.
Page 37	Deploying rooftop solar remains a key priority for the Government, and it continues to be one of the most popular	The clarification makes it clear that there is no intention to change the definitions of best and most versatile

Table 9: Powering Up Britain Energy Security Plan (updated April 2023)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	and easily deployed renewable energy sources; over a million homes now have solar panels installed. Solar can benefit households and businesses by allowing them to reduce electricity bills significantly and receive payment for excess electricity generated. Ware houses, distribution centres and industrial buildings with high electricity demand can offer significant potential for solar deployment, which can rapidly pay for itself by means of energy bill savings. The Government is looking to facilitate and promote extensive deployment of rooftop solar on industrial and commercial property in order to make maximum usage of available surfaces for business as well as environmental and climate benefits, with consideration for ongoing food production or environmental improvement. The Government will therefore not be making changes to categories of agricultural land in ways that might constrain solar deployment.	(BMV) land. It also states that it expects solar developments to take place on low/medium grade agricultural land. Although 65% of the Site is located on BMV agricultural land, it is considered to be in a location supported by the Powering Up Britain Plan. The clear justification as to why this BMV land remains in the Scheme is set out in the Site Selection Assessment **[REP1-037]** which demonstrates that the use of any other land in this area for a comparably sized scheme would likely result in a similar impact on agricultural land. Given the reversible nature of the Scheme, BMV land will not be permanently lost and the Applicant, therefore, considers that the Scheme accords with this policy.

3 Local Policy Accordance Tables

3.1 North Northamptonshire Joint Core Strategy

Table 10: North Northamptonshire Joint Core Strategy 2011-2031 (Adopted 2016) (NNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Policy 1 - Presumption in favour of Sustainable Development	When considering development proposals, the Local Planning Authority will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area meeting the challenges of climate change and protecting and enhancing the provision of ecosystems services. To be regarded as 'sustainable' within the context of North Northamptonshire, development should contribute to delivering the Plan Vision and Outcomes through compliance with the relevant policies of this Plan. Development that conflicts with policies of the Plan will be refused unless material considerations indicate otherwise. Where a development is otherwise acceptable, but an independent viability appraisal demonstrates that certain policy standards cannot be achieved, the Local	Due to the scale of the land required to deliver the substantial renewable energy generation capacity that the Scheme will provide, and the need to be in sufficient proximity of the connection point to the National Electricity Transmission System (NETS), the Scheme could not be located within an urban area or settlement boundary as explained within the Site Selection Assessment **[REP1-037]**. The Scheme will deliver wider sustainability benefits, being a renewable energy development that will make a substantial contribution to the country achieving net-zero carbon emissions. This will comply with the objectives of sustainable development and achieve significant benefits in terms of landscaping, biodiversity enhancement and responding to climate change. Other sustainability considerations are explained in Section 6 of this Planning Statement **[EX4/GH7.15_B].** The Scheme will therefore achieve the objectives of and is considered compliant with Policy 1.

Table 10: North Northamptonshire Joint Core Strategy 2011-2031 (Adopted 2016) (NNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	Planning Authority will work with the applicant to consider alternative approaches to deliver the desired policy outcomes.	
Policy 2 – Historic Environment	The distinctive North Northamptonshire historic environment will be protected, preserved and, where appropriate, enhanced. Where a development would impact upon a heritage asset and/or its setting: a) Proposals should conserve, and where possible, enhance the heritage significance and setting of an asset or group of heritage assets in a manner commensurate to its significance; b) Proposals should complement their surrounding historic environment through the form, scale, design and materials; c) Proposals should protect and, where possible, enhance key views and vistas of heritage assets, including of the church spires along the Nene Valley and across North Northamptonshire; d) Proposals should demonstrate an appreciation and understanding of the impact of development on heritage assets and their setting in order to minimise harm to these assets and their setting. Where loss of historic features or archaeological remains is unavoidable and justified,	Chapter 12: Cultural Heritage of the ES **[APP-049]** provides an assessment of the Scheme on the historic environment, including above, at, and below ground assets. A proportion of the Site, including the proposed BESS and proposed cable routes, adjacent to the Grendon National Grid Substation is within Nene Valley. Chapter 12: Cultural Heritage of the ES **[APP-049]** concludes that there is likely to be some indirect impact on heritage assets during the construction and operational stages. Where significant effects are likely to occur, additional mitigation measures have been considered to reduce or offset adverse effects. The design of the BESS, as well as other Scheme components, have considered the impact on heritage assets and setting. The Design Approach Document **[APP-556]** Chapter 12: Cultural Heritage of the ES **[APP-049]** states that once operational, the Scheme will not cause further direct adverse effects on buried archaeological remains. The operational phase of the Scheme will see the replacement of panels, substation, and BESS infrastructure,

Table 10: North Northamptonshire Joint Core Strategy 2011-2031 (Adopted 2016) (NNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	provision should be made for recording and the production of a sustainable archive and report; e) Where appropriate, flexible solutions to the re-use of buildings and conservation of other types of heritage assets at risk will be encouraged, especially, where this will result in their removal form the 'at risk' register.	without additional piling or ground disturbance beyond that undertaken during the construction phase. If works are required during the operational phase that cause additional impacts to buried remains, an assessment will determine impacts and necessary mitigation per the OCEMP **[REP1-131]** Once the Scheme has been decommissioned, land would revert to baseline conditions (or as close to as reasonably possible), and any temporary impacts to setting would be reversed. Therefore, the Scheme will comply with policy 2. The Chapter 4: Scheme Description of the ES **[REP1-031].**
Policy 3 – Landscape Character	Development should be located and designed in a way that is sensitive to its landscape setting, retaining and, where possible, enhancing the distinctive qualities of the landscape character area which it would affect. Development should: a) Conserve and, where possible, enhance the character and qualities of the local landscape through appropriate design and management; b) Make provision for the retention and, where possible, enhancement of features of landscape importance; c) Safeguard and, where possible, enhance important views and vistas including sky lines within the development layout; d)	Impacts upon landscape Character and Visual amenity are assessed within ES Chapter 8: Landscape and Visual Impact **[APP-045]**. Section 6.6 of the Planning Statement **[EX4/GH7.15_B]** concludes the 'acceptability' of the Scheme's adverse landscape and visual impacts need to be weighed against the nationally significant benefits of the Scheme and acknowledge that with NSIP scale generation schemes, some landscape and visual impacts are acceptable. In this context, it is considered that the landscape and visual effects that would result and not unacceptable, and that the Scheme is therefore generally compliant with Policy 3.

Table 10: North Northamptonshire Joint Core Strategy 2011-2031 (Adopted 2016) (NNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	Protect the landscape setting and contribute to maintaining the individual and distinct character, and separate identities of settlements by preventing coalescence; e) Provide appropriate landscape mitigation and/or suitable off-site enhancements; and f) Preserve tranquillity within the King's Cliffe Hills and Valleys Landscape Character Area (as shown on the Policy Map) and other areas identified in Part 2 Local Plans by minimising light and noise pollution and minimising the visual and traffic impacts of development.	ES Chapter 8: LVIA **[APP-045]** acknowledges that there will be an adverse impact on the landscape during construction and at Year 1 of operation. The Design Approach Document **[APP-560]** sets out how the design has minimised to conserve the existing landscape character as much as possible through identifying key visual receptors and key views and providing mitigation measures to reduce the impact. Therefore, the Scheme is in accordance with part a) of the Policy. ES Chapter 8: LVIA **[APP-045]** provides green infrastructure and mitigation measures, which at Year 15, confirm that the Scheme will have a significant moderate beneficial effect on the landscape fabric. Therefore, it is in accordance with part b) of the Policy. ES Chapter 8: LVIA **[APP-045]** confirms that the key viewpoints were agreed with the North Northamptonshire Landscape Officer. The Design Approach Document **[APP-560]** adds the identification of key visual receptors and key views has considered has influence the design of the Scheme in line with part c) of the Policy. ES Chapter 8: LVIA **[APP-045]** acknowledges that there will be an adverse impact on the landscape fabric during construction and at Year 1 of operation. However, due to the

Table 10: North Northamptonshire Joint Core Strategy 2011-2031 (Adopted 2016) (NNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		proposed mitigation measures, at Year 15 of operation, the effect on the landscape fabric is assessed as a moderate beneficial effect. Therefore, it is in accordance with part d) of the Policy. ES Chapter 8: LVIA **[APP-045]** sets out the embedded mitigation planting which will be established at Year 15. It confirms that at Year 15, with the mitigation measures in place, the effect on the landscape fabric is moderate beneficial, which is considered significant. Therefore, the Scheme is in accordance with part e). The Scheme is not situated within the King's Cliffe Hills and Valleys Landscape Character Area and so is in accordance with part f) of the Policy,
Policy 4 - Biodiversity and Geodiversity	A net gain in biodiversity will be sought and features of geological interest will be protected and enhanced through: a) Protecting existing biodiversity and geodiversity assets by: i. Refusing development proposals where significant harm to an asset cannot be avoided, mitigated or, as a last resort, compensated. The weight accorded to an asset will reflect its status in the hierarchy of biodiversity and geodiversity designations; ii.	Assessment of Ecological impacts is set out in ES Chapter 9: Ecology and Biodiversity **[REP1-033]**. Section 6.7 of the Planning Statement **[EX4/GH7.15_B]** concludes that with the embedded mitigation measures proposed which are wide-ranging and respond directly to the type of species and habitats that are affected, the Scheme is expected to have an overall significant beneficial effect. A Biodiversity Net Gain (BNG) Assessment, using Defra's Metric 4.0 has been provided

Table 10: North Northamptonshire Joint Core Strategy 2011-2031 (Adopted 2016) (NNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	Protecting key assets for wildlife and geology, in particular the Upper Nene Valley Gravel Pits Special Protection Area and Ramsar Site, from unacceptable levels of access and managing pressures for access to and disturbance of sensitive habitats; iii. Protecting the natural environment from adverse effects from noise, air and light pollution; iv. Where appropriate requiring developments to provide or contribute to alternative green infrastructure (Policy 19); and v. Ensuring that habitats are managed in an ecologically appropriate manner. b) Enhancing ecological networks by managing development and investment to: i. Reverse the decline in biodiversity and restore the ecological network at a landscape scale in the Nene Valley Nature Improvement Area (NIA); ii. Reverse habitat fragmentation and increase connectivity of habitats where possible by structuring and locating biodiversity gain in such a way as to enlarge and/or connect to existing biodiversity assets such as wildlife corridors; iii. Preserve, restore and create priority and other natural and semi-natural habitats within and adjacent to development schemes. c) Supporting, through developer contributions or development design, the protection and	within the DCO application **[REP1-043]**. This sets out the significant net gains in biodiversity that the Scheme will provide. The Scheme has taken advantage of opportunities to conserve and enhance biodiversity and accords with this policy. The Scheme has therefore incorporated improvements in biodiversity and accords with this policy. See also Section 6.7 of the Planning Statement **[EX4/GH7.15_B]** for further detail on the biodiversity measures incorporated and compliance with planning policy. These local policies must be considered in the context of the nationally significant benefits to low-carbon, secure and sustainable renewable energy generation that the Scheme will bring, and the likely increased level of effect that is associated with, and acceptable for, a scheme of this scale in comparison with a smaller scheme that would deliver only locally or regionally significant benefits and for which the local policies are designed to deal with. The Scheme will therefore adhere to the requirements of this policy.

Table 10: North Northamptonshire Joint Core Strategy 2011-2031 (Adopted 2016) (NNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	recovery of priority habitats and species linked to national and local targets. Such measures could include the retention of, and provision of areas of open green space, and hard and soft landscaping to address habitat and visitor management. d) Developments that are likely to have an adverse impact, either alone or in-combination, on the Upper Nene Valley Gravel Pits Special Protection Area or other European Designated Sites must satisfy the requirements of the Habitats Regulations, determining site specific impacts and avoiding or mitigating against impacts where identified. Mitigation may involve providing or contributing towards a combination of the following measures: i. Access and visitor management measures within the SPA; ii. Improvement of existing greenspace and recreational routes; iii. Provision of alternative natural greenspace and recreational routes; iv. Monitoring of the impacts of new development on European designated sites to inform the necessary mitigation requirements and future refinement of any mitigation measures. A Mitigation Strategy document concerning the Upper Nene Valley Gravel Pits Special Protection Area will be produced, with a view to its subsequent adoption as an Addendum to	

Table 10: North Northamptonshire Joint Core Strategy 2011-2031 (Adopted 2016) (NNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	the Upper Nene Valley Gravel Pits Special Protection Area Supplementary Planning Document by June 2016, to support the adopted Joint Core Strategy 2011-2031. Development proposals will need to take account of the Northamptonshire Biodiversity Supplementary Planning Document, the Upper Nene Valley Gravel Pits Special Protection Area Supplementary Planning Document and the JPU Mitigation Strategy for the Upper Nene Valley Gravel Pits Special Protection Area. Where necessary, this will include new residential development contributing towards implementation of this Mitigation Strategy.	
Policy 5 – water environment, resources and flood risk management	Development should contribute towards reducing the risk of flooding and to the protection and improvement of the quality of the water environment. This will be achieved through the following criteria: a) Development should, wherever possible, be avoided in high and medium flood risk areas through the application of a sequential approach considering all forms of flooding for the identification of sites and also the layout of development within site boundaries; b) Development should meet a minimum 1% (1 in 100) annual probability standard of flood protection with allowances for climate change	Flood Risk impacts are assessed in ES Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]** and are concluded that they are not significant. The Flood Risk Assessment and Drainage Strategy Report **[REP1-053]** has duly considered drainage design to reduce the risk of flooding. The Flood Risk and Drainage Strategy Report **[REP1-053]** provides a detailed assessment of the risk of flooding to and from the Scheme (taking account of climate change) and concludes that the risk of flooding will not be

Table 10: North Northamptonshire Joint Core Strategy 2011-2031 (Adopted 2016) (NNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	unless local studies indicate a higher annual probability, both in relation to development and the measures required to reduce the impact of any additional run off generated by that development to demonstrate that there is no increased risk of flooding to existing, surrounding properties; c) Development should be designed from the outset to incorporate Sustainable Drainage Systems wherever practicable, to reduce flood risk, improve water quality and promote environmental benefits; d) Where appropriate, development should, subject to viability and feasibility, contribute to flood risk management in North Northamptonshire; e) Following any identified mitigation, development that would lead to deterioration or may compromise the ability of a water body or underlying groundwater to meet good status standards in the Anglian River Basin Management Plan (required by the Water Framework Directive) is unlikely to be permitted; f) Development will only be permitted where it can be demonstrated that adequate and appropriate water supply and wastewater	increased as a result of the construction, operation or decommissioning of the Scheme. The implementation of embedded mitigation measures and best practice control measures to manage surface water during the construction of the Scheme will be secured via a detailed CEMP which is to be substantially in accordance with the OCEMP **[REP1-131],** and a Surface Water Drainage Strategy, which is to be substantially in accordance with the Outline Drainage Strategy, which forms part of the Flood Risk Assessment **[REP1-053]**. It is therefore considered that the Scheme is compliant with this policy.

Table 10: North Northamptonshire Joint Core Strategy 2011-2031 (Adopted 2016) (NNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	infrastructure is available (or will be prior to occupation).	
Policy 10 – Provision of Infrastructure	Development must be supported by the timely delivery of infrastructure, services and facilities necessary to meet the needs arising from the development and to support the development of North Northamptonshire. To achieve this: a) A combination of funding sources will be sought to deliver the infrastructure required by this plan. Developers will either make direct provision or will contribute towards the provision of infrastructure required by the development either alone or cumulatively with other developments; b) Development should seek to minimise increases in the demand for infrastructure and services including through measures to encourage a reduction in car use, measures to limit the need for additional/expanded water and waste infrastructure and to create safe, healthy environments; c) Planning permission will only be granted if it can be demonstrated that there is or will be sufficient infrastructure capacity provided within an agreed timescale to support and	As explained in the Statement of Need **[APP-556]** and summarised in Section 4 of the Planning Statement **[EX4/GH7.15_B]**, the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon electricity to help meet the UK's urgent need to decarbonise with solar technology supported by recent government policy, as well as more recently to provide security of supply as well as affordability for end consumers. The OCEMP **[REP1-131]** encourages the use of lower carbon modes of transport by identifying and communicating local bus connections and pedestrian and cycle access routes to/ from the Scheme to all construction staff, and providing appropriate facilities for the safe storage of cycles. A Travel Plan is also proposed to reduce volume of staff and employee trips to the sites. The final measures and details will be confirmed in the CEMP. The Scheme would contribute to meeting the established urgent need for renewable energy generation infrastructure, which warrants its location in a rural area. Consultation has been undertaken with the relevant planning authorities. The DCO

Table 10: North Northamptonshire Joint Core Strategy 2011-2031 (Adopted 2016) (NNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	meet all the requirements arising from the proposed development; d) The local planning authorities will work with developers and infrastructure/service providers to identify viable solutions to delivering infrastructure, where appropriate through phasing conditions, the use of interim measures and the provision of co-located facilities; e) Next Generation Access broadband should be provided to serve all areas by partnering with a telecommunications provider or providing on-site infrastructure to enable the premises to be directly served.	Requirements in the draft DCO are subject to controls such as approvals and consultation with the relevant planning authorities. In addition, the Applicant has committed to providing a Community Benefit Fund. Although the Fund does not form part of the of the DCO application and the funding is not required to mitigate the impacts of the Scheme, it will be available to fund local community projects.
Policy 11 – The Network of Urban and Rural Areas	Development will be distributed to strengthen the network of settlements in accordance with the roles in Table 1 and to support delivery of the place-shaping principles set out in Table 2. The special mixed urban/rural character of North Northamptonshire with its distinctive and separate settlements will be maintained through the avoidance of coalescence. 1. The Urban Areas a) The Growth Towns will be the focus for infrastructure investment and higher order facilities to support major	Due to the scale of the land required to deliver the substantial renewable energy generation capacity that the Scheme will provide, and the need to be in sufficient proximity of the connection point to the National Electricity Transmission System (NETS), the Scheme could not be located within an urban area or settlement boundary as explained within the Site Selection Assessment **[REP1-037]**. Chapter 17: Socio-Economics, Tourism and Recreation of the ES **[APP-054],** considers the socio-economic impact of the Scheme. It also sets out that in procurement of the contractor to complete the construction works, strong

Table 10: North Northamptonshire Joint Core Strategy 2011-2031 (Adopted 2016) (NNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	employment, housing, retail and leisure development. b) The Market Towns will provide a strong service role for their local communities and surrounding rural areas with a growth in homes and jobs to support regeneration and local services, at a scale appropriate to the character and infrastructure of the town. c) Provision will be made for new housing as set out in Policy 28. Any proposals for significant additional growth should be tested and supported through Part 2 Local Plans or Neighbourhood Plans. d) The Sustainable Urban Extensions shown on the Key Diagram provide strategic locations for housing and employment development within and beyond the plan period. If it is necessary to identify additional sites to maintain a 5 year deliverable supply of housing land in a district in accordance with Policy 28, these should be identified at the Growth Town followed, if necessary and relevant, by the Market Towns within that district. 2. The Rural Areas	consideration will be given to their strategy for engaging the local supply chain and using local materials where possible and practical. The permanent jobs created to support the Scheme are a reflection of the requirements to maintain the infrastructure. An OSSCEP **[APP-552]** will be prepared prior to the commencement of construction. This will set out measures that the Applicant will implement in order to: • Advertise and promote employment opportunities associated with the Scheme in construction and operation locally. • Advertise those elements of the supply chain required for the construction and operation of the authorised development and which provide opportunities for Local Companies. The Scheme is considered an acceptable use in the countryside as set out in 2 – The Rural Area, part d as it is a renewable energy development. Therefore, the Scheme is in accordance with Policy 11.

Table 10: North Northamptonshire Joint Core Strategy 2011-2031 (Adopted 2016) (NNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	a) Development in the rural areas will be limited to that required to support a prosperous rural economy or to meet a locally arising need, which cannot be met more sustainably at a nearby larger settlement. b) Small scale infill development will be permitted on suitable sites within Villages where this would not materially harm the character of the settlement and residential amenity or exceed the capacity of local infrastructure and services. Part 2 Local Plans and/or Neighbourhood Plans may identify sites within or adjoining Villages to help meet locally identified needs or may designate sensitive areas where infill development will be resisted or subject to special control. c) Local and Neighbourhood Plans will identify sites within or adjoining the villages to meet the rural housing requirements identified in Table 5. Other than small scale infilling or 'rural exceptions' schemes, development above these requirements will be resisted unless agreed through the Part 2 Local Plan or Neighbourhood	

Table 10: North Northamptonshire Joint Core Strategy 2011-2031 (Adopted 2016) (NNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	Plans to meet a particular local need or opportunity. d) Rural diversification and the appropriate re-use of rural buildings will be supported in accordance with Policy 25. Renewable energy developments will be considered under Policy 26. Other forms of development will be resisted in the open countryside unless there are special circumstances as set out in Policy 13 or national policy. e) The strategic opportunity for an exemplar sustainable new village community at Deenethrope Airfield will be explored in accordance with Policy 14.	
Policy 17 – North Northamptonshire's Strategic Connections	North Northamptonshire's strategic connections with surrounding areas will be strengthened and enhanced by managing development and investment to ensure that they are to the standard necessary to fulfil the role expected of them. New development that would prejudice their role will not be permitted.	Policy 17 does cite improvements and investments to the A45, namely improvements to the A45/A6 Chowns Mill junction and dualling between Stanwick and Thrapston. The Cable Route Corridor does cross the A45 to the south of Earls Barton. However, the Cable Route Corridor is to be located below ground in order to minimise impact. Therefore, the Scheme is in accordance with this Policy.

Table 10: North Northamptonshire Joint Core Strategy 2011-2031 (Adopted 2016) (NNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Policy 19 – The Delivery of Green Infrastructure	The special mixed urban and rural character of North Northamptonshire will be maintained and enhanced by: a) Managing development and investment to secure a net gain in green infrastructure through: i. Establishing multi-functional greenspaces within the GI network; ii. Providing, where opportunities exist, new wildlife habitats, facilities and routes to enhance assets and the linkages between them; iii. Supporting the strategic green infrastructure priorities of 1. The Nene and Ise Valleys (Policy 20) 2. The Rockingham Forest (Policy 21). b) Safeguarding identified sub-regional green infrastructure corridors by: i. Not permitting development that compromises their integrity and therefore that of the overall green infrastructure network; ii. Using developer contributions to facilitate improvements to their quality and robustness; iii. Investing in enhancement and restoration where opportunities exist. c) Contributing towards the enhancement or ongoing management of local green infrastructure corridors by prioritising green infrastructure investment in areas where net gains can be made to the range of functions, particularly those that improve access	Green infrastructure, in the form of Public Rights of Way have undergone analysis and are to be enhanced during the construction phase as secured within the OCEMP **[REP1-131]**, in order to deliver lasting improvements to the green infrastructure, and indirectly to the social infrastructure that is the Public Rights of Way. No loss or harm to the green and blue infrastructure network is anticipated. Through the OPRoWMP **[REP1-147]**, it is proposed that the PRoWs which traverse the Scheme are to be improved. This is considered to constitute a contribution which is proportionate to the Scheme. The enhancements to the PRoWs encourage healthy and active lifestyles. Therefore, the Scheme is considered to comply with the requirements of Policy 19 as it maintains and enhances the rural character of North Northamptonshire.

Table 10: North Northamptonshire Joint Core Strategy 2011-2031 (Adopted 2016) (NNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	between the towns and their surrounding countryside and remedy local deficiencies in open space provision and quality; d) Requiring, where appropriate, project level Habitats Regulations Assessments, to ensure the protection of European designated sites such as the Upper Nene Valley Gravel Pits Special Protection Area and Ramsar Site	
Policy 20 – The Nene and Ise Valleys	The Nene and Ise Valleys will be priorities for investment in green infrastructure to strengthen biodiversity and landscape character, support a prosperous local economy, provide leisure and recreational opportunities and support the revitalisation of towns and the protection and enhancement of their surrounding countryside. Proposals should ensure the integrity of European designated sites such as the Upper Nene Valley Gravel Pits SPA are protected. This will be achieved by managing development and investment to: a) Improve visual and physical linkages between the rivers and waterways and adjacent settlements by creating and maximising vistas to the valley/water and ensuring development, public realm and access are orientated to the valley/water.	The Scheme is not located within the Nene Valley boundary. However, as detailed in Sections 4 and 6 of the Planning Statement **[EX4/GH7.15_B]** and by the Design Approach Document **[APP-560]**, the Scheme has been subject to a detailed and sensitive iterative design process, resulting in a high standard of design, as required by this Policy. This has taken account of the context and features of the land within the Order limits, nearby sensitive receptors and assets, information emerging from environmental surveys, feedback from stakeholders, and opportunities and constraints in order to develop a good design that balances the need to maximise the energy generation capacity of the Scheme, with the avoidance and mitigation of impacts, and provision of environmental and other enhancements where practicable. The design process and basis of the design decisions are

Table 10: North Northamptonshire Joint Core Strategy 2011-2031 (Adopted 2016) (NNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	b) Develop the tourism potential of Wellingborough, Thrapston and Oundle as gateways to the rivers and the wider valleys as focal points for the provision of waterside facilities. c) Prioritise the protection and enhancement of existing visitor attractions and facilities with appropriate infrastructure to ensure that these remain the focal points for visitors, in order to take the pressure off more sensitive locations. d) Support new green infrastructure and heritage based attractions of a type and scale that can be accommodated by existing or new infrastructure and which strike an appropriate balance between visitor numbers and biodiversity, landscape, local amenity and heritage interests. e) Provide a focus for improved navigation and enhanced waterways along the River Nene. f) Improve strategic recreation trails along the length of the Nene Valley and developing these in the Ise Valley. g) Identify opportunities and proposals for floodplain and river re-naturalisation,	described in Chapter 5: Alternatives and Design Evolution of the ES **[APP-042]**. As explained by the Design Approach Document **[APP-560]**, the design of the Scheme and its components will be sensitive to its surroundings. Maximum height parameters seek to deliver a scheme that integrates with its surroundings, whilst delivering the technical requirements that enable the efficient generation of a large amount of electricity. For example: the maximum heights of solar arrays have been designed to deliver the technical requirements whilst enabling effective screening by hedgerows.

Table 10: North Northamptonshire Joint Core Strategy 2011-2031 (Adopted 2016) (NNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	de-culverting within urban areas and river habitat improvements.	
Policy 22 – Delivering Economic Prosperity	A stronger more sustainable economic that will deliver a net increase of 31,100 jobs will be sought through: a) Ensuring that sufficient high quality sites are identified to support the delivery of the job targets in Table 3 (see Policy 23), recognising opportunities provided by the priority sectors of Renewable and Low Carbon Energy and Green Technologies. b) Prioritising the enhancement of existing employment sites and the regeneration of previously developed land; c) Safeguarding existing and committed employment sites for employment use unless it can be demonstrated by an applicant that there is no reasonable prospect of the site being used for that purpose and that an alternative use would: • Not be detrimental to the mix of uses within a Sustainable Urban Extension; and/or	Chapter 17: Socio-Economics, Tourism and Recreation of the ES **[APP-054]**, considers the socio-economic impact of the Scheme. It also sets out that in procurement of the contractor to complete the construction works, strong consideration will be given to their strategy for engaging the local supply chain and using local materials where possible and practical. The permanent jobs created to support the Scheme are a reflection of the requirements to maintain the infrastructure. An OSSCEP **[APP-552]** will be prepared prior to the commencement of construction. This will set out measures that the Applicant will implement in order to: • Advertise and promote employment opportunities associated with the Scheme in construction and operation locally. • Advertise those elements of the supply chain required for the construction and operation of the authorised development and which provide opportunities for Local Companies. The Scheme is therefore a proposal that encourages a co-ordinated approach to skills,

Table 10: North Northamptonshire Joint Core Strategy 2011-2031 (Adopted 2016) (NNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	• Resolve existing conflicts between land uses. d) Supporting proposals that encourage a co-ordinated approach to skills and training provision and promote sector specific training. Training and employment agreements will be encouraged to facilitate increased opportunities for the local workforce. e) Safeguarding and enhancing North Northamptonshire's tourism and cultural assets and supporting proposals to expand to the tourism industry in sustainable ways.	training and employment that increases opportunities for the local workforce.
Policy 25 _ Rural Economic Development and Diversification	1. Sustainable opportunities to develop and diversify the rural economy that are of an appropriate scale for their location and respect the environmental quality and character of the rural area will be supported. Enhanced broadband provision to facilitate economic development within rural areas will be supported. Encouragement will be given towards: a) The development and diversification of agricultural and other land based businesses including locally sourced produce and increasing use of sustainable food production methods;	Due to the scale of the land required to deliver the substantial renewable energy generation capacity that the Scheme will provide, and the need to be in sufficient proximity of the connection point to the National Electricity Transmission System (NETS), the Scheme could not be located within an urban area or settlement boundary as explained within the Site Selection Assessment **[REP1-037]**. The Scheme includes green infrastructure such as woodland and hedgerows. This green infrastructure contributes towards landscape mitigation as well as providing biodiversity net

Table 10: North Northamptonshire Joint Core Strategy 2011-2031 (Adopted 2016) (NNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	b) The provision and expansion of tourist and visitor facilities, recognising that locations with access to local services and facilities by foot, cycle or public transport provide the greatest opportunity for sustainable rural development; c) Commercial opportunities related to food, craft and ecotourism, and Green Infrastructure Projects; d) The enhancement of local supply networks, linking businesses and consumers, that support the shift to a low carbon economy and to support local rural producers and businesses. 2. Sustainable rural diversification activities should seek to complement and support the ongoing viability of the existing business. Where proposals involve the re-use of rural buildings, a mix of uses will be supported, including small scale business, tourism activities, tourist accommodation and live/work units.	gains in excess of 10%. Therefore, the Scheme is in accordance with part c). Therefore, the Scheme is considered to be in line with Part 2 of Policy 25. An OSSCEP **[APP-552]** will be prepared prior to the commencement of construction. This will set out measures that the Applicant will implement in order to: • Advertise and promote employment opportunities associated with the Scheme in construction and operation locally. • Advertise those elements of the supply chain required for the construction and operation of the Scheme and which provide opportunities for local businesses.
Policy 26 – Renewable and Low Carbon Energy	Proposals for sensitively located renewable and low carbon energy generation will be supported where it can be demonstrated that the proposal meets all of the following criteria:	Large-scale solar farms, and the Scheme in particular, directly respond to the urgent need to deliver a large amount of renewable generation capacity quickly. The Scheme therefore represents a significant contribution

Table 10: North Northamptonshire Joint Core Strategy 2011-2031 (Adopted 2016) (NNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	a) The landscape impact of the development is minimised and mitigated against; b) The development links to a specific demand through a decentralised energy network or where this is not possible, the necessary infrastructure is provided to supply power to the National Grid; c) The siting of development avoids harm to the significance of a heritage asset and its setting in accordance with the provisions of the NPPF; d) The siting of development does not significantly adversely affect the amenity of existing, or proposed, residential dwellings and/or businesses, either in isolation or cumulatively, by reason of noise, odour intrusion, dust, traffic generation, visual impact or shadow flicker; e) The development does not result in an adverse impact on the capacity and safety of the highways network and of public rights of way; f) The development includes a managed programme of measures to mitigate against any adverse impacts on the built and natural environment resulting from the construction,	to the zero-carbon hierarchy on a national scale. In terms of the specific policy requirements: a) It is generally compatible (taking into consideration the nationally significant benefits that the Scheme will bring, and the likely increased level of the effect that is associated with, and acceptable for a scheme of this scale in comparison with a smaller scheme) with policies to safeguard the landscape character, as demonstrated by Section 6.6 of the Planning Statement **[EX4/GH7.15_B]**. b) Given the nationally significant benefit of the Project, the Scheme is being provided to supply power directly to the National Grid. c) It is generally compatible (taking into consideration the nationally significant benefits that the Scheme will bring, and the likely increased level of the effect that is associated with, and acceptable for a scheme of this scale in comparison with a smaller scheme) with policies to safeguard heritage assets and their settings, as demonstrated by Section 6.10 of the Planning Statement **[EX4/GH7.15_B].**

Table 10: North Northamptonshire Joint Core Strategy 2011-2031 (Adopted 2016) (NNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	operation and decommissioning of any equipment/infrastructure; g) The development does not create a significant adverse cumulative noise or visual impact when considered in conjunction with other developments planned within North Northamptonshire and adjoining local authority areas; h) The development retains and enhances on-site biodiversity and supports the enlargement of, and/or connection to, existing biodiversity assets such as wildlife corridors, where possible; i) Proposals for Solar Photovoltaic farms avoid the best and most versatile agricultural land. Provision will be made for the removal of apparatus and reinstatement of the site to an acceptable condition, should the scheme become redundant and/or at the end of the permitted period for time limited planning permissions.	d) The Scheme is not considered to result in unacceptable impacts in terms of any effects captured within the policy as set out in the ES that accompanies the submission **[APP-037-APP-544]**. e) Chapter 10: Transport and Access for the ES **[REP1-023]** and the accompanying Transport Assessment **[APP-150]** confirm that the Scheme does not result in an adverse impact on the capacity and safety of the highways network. The OPRoWMP sets out the enhancements and improvements to the affected PRoWs **[REP1-147]**. f) An OCEMP Plan **[REP1-131]**, OOEMP **[EX4/GH7.2_B]** and ODS **[REP1-135]** set out measures to mitigation against any adverse impacts of the Scheme. g) Chapter 8: Landscape and Visual Impact **[APP-045]** and Chapter 14: Noise and Vibration of the ES **[APP-051]** considers the noise and visual impacts of the Schemes and assesses them cumulatively in conjunction with other planned developments within North Northamptonshire and adjoining Local Authority areas.

Table 10: North Northamptonshire Joint Core Strategy 2011-2031 (Adopted 2016) (NNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		h) Chapter 9: Ecology and Biodiversity of the ES **[REP1-033]** sets out the on-site biodiversity considerations. The Biodiversity Net Gain Assessment **[REP1-043]** confirms that the Scheme is providing significant biodiversity net gain benefits, well above the mandatory requirement. i) The Scheme will result in the Order Limits being developed across 65% BMV land with the remainder of the Scheme being built across Non-BMV land as set out in Section 6.18 of the Planning Statement **[EX4/GH7.15_B]**. Despite this percentage of BMV land, the Site Selection Assessment **[REP1-037]** demonstrates that the use of any other land in this area for a comparably sized scheme would likely result in a similar impact on agricultural land. An ODS **[REP1-135]** has been produced in order to provide a base from which the decommissioning and reinstatement of the site will be conducted at the end of the operational phase of up to 60 years. Given the timescales and nature of the proposals, full details will be secured within a Decommissioning Statement, following the Outline Statement.

Table 10: North Northamptonshire Joint Core Strategy 2011-2031 (Adopted 2016) (NNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		The Scheme is considered to generally accord with the requirements of this Policy.

3.2 Wellingborough Local Plan Part 2

Table 11: Wellingborough Local Plan Part 2 (Adopted 2019) (WLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Policy GI 1 – Local Green Infrastructure Corridor	Development must be designed to protect and enhance existing Green Infrastructure networks, and the connections between them where possible. Local GI corridors within Wellingborough town as identified on the Policies Map, will be priorities for investment and improvement. These will be protected and enhanced by: A) ensuring that new development will not compromise the integrity of the green infrastructure network; B) ensuring new development maintains existing and where appropriate provides appropriate connections to the existing green corridors; C) ensuring that wherever possible new open space connects to or is provided within the green infrastructure corridors;	The Scheme is not located on any land that is designated as Local Green Space. The Scheme's design includes embedded additional measures that will deliver biodiversity enhancements; improved connectivity and enhancement of PRoW through the provision of three new permissive paths and proposes a landscape strategy which is sensitive to its surroundings, by reducing the Scheme's impact on the landscape and providing opportunities for screening to protect residential amenities. The Scheme would also provide benefits to the local community via an enhanced green infrastructure network including a better connected footpath and cycle network and access to open space and recreational spaces. Therefore, the Scheme is considered to be compliant with this Policy.

Table 11: Wellingborough Local Plan Part 2 (Adopted 2019) (WLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	D) prioritising investment in enhancement of open space, sport and recreation in green infrastructure corridors; and E) using developer contributions to facilitate improvements to their quality. In the rural areas Local GI corridors will be protected and enhanced. Opportunities to connect these corridors into the wider GI network will be supported.	
Policy GI 2 – Local Open Space	Local Open Space, as designated on the Policies Map, will be protected and where possible enhanced. Development that will result in its loss will only be permitted in the following exceptional circumstances: A. Where the asset is not identified for its historic, biodiversity or geological importance; and B. Loss of the site would not result in a deficiency in accessing that type of open space within the locality(v) and the site could not be used to meet a deficiency in accessing any other type of open space; or C. Provision is to be made on an alternative and appropriate site which is easily accessible and provides	Footpaths and Bridleways within the Scheme's Order Limits are subject to some disruption during the Construction and Decommissioning phases of the Scheme. Due regard has been made to minimise disruption through mitigation measures. Enhancement measures have been put in place and are explored within the OPRoWMP **[REP1-147]**. In addition to the mitigation measures for the footpaths and bridleway, set out in the Management Plan, ES Chapter 8: Landscape and Visual Impact **[APP-045]** confirms that the Scheme is providing (amongst other landscaping) 14.45ha of green corridor and woodland planting. With all the landscaping implemented, ES Chapter 8: Landscape and Visual Impact **[APP-045]** confirms that the Scheme will provide a significant moderate benefit at Year 15 and at decommissioning.

Table 11: Wellingborough Local Plan Part 2 (Adopted 2019) (WLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	equivalent or better community benefit; or D. The development relates to a small part of the site where this is agreed to represent the best means of retaining or enhancing the open space; or E. The site is of poor quality and cannot be enhanced to meet the quality standards identified in Table 5.1 and development represents the best option for achieving an alternative open space elsewhere; and F. Loss of the site will not result in a break in the connection of a green infrastructure corridor as shown on the Policies Map	Therefore, the Scheme is compliant with this policy.
Policy GI 3 – Local Green Space	Development which will result in the loss of a site designated as Local Green Space on the Policies Map will not be permitted unless it can be clearly demonstrated that the development will not conflict with the purpose of the designation.	The Scheme is not located on any land that is designated as Local Green Space. Therefore, the Scheme is considered to be compliant with this Policy.
Policy Site 9 – Sywell Aerodrome	Development proposals at Sywell Aerodrome as outlined on the Policies Map, including new buildings; extensions; and changes of use, associated with aviation and other employment uses that modernise and enhance the physical environment and	The Scheme is situated approximately 500m from the Sywell Aerodrome and is not considered to prejudice aviation uses at Sywell Aerodrome following the EIA.

Table 11: Wellingborough Local Plan Part 2 (Adopted 2019) (WLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	infrastructure at Sywell Aerodrome will be supported. This is providing there is no conflict with the overall function and developability of the area and surrounding land uses. The council would particularly support developments that provide jobs in high-end aviation, engineering and design, training and corporate entertainment. Ancillary services, such as cafes or crèches, will be supported where they are small scale, primarily meet the needs of the businesses at Sywell Aerodrome, and enhance the attraction and sustainability of the area for investment. The council will seek to resist development within the immediate vicinity of the aerodrome, if such development would prejudice aviation use on the site.	Chapter 15: Glint and Glare of the ES **[APP-052]** considers the impact of the Scheme on the Aerodrome. The Scheme is accompanied by an Empirical Evidence on Glint and Glare from Solar PV Installations near UK Aerodromes **[APP-572].** It confirms that no additional mitigation was required at the Sywell Aerodrome as the results do not result in a significant impact on the aviation sector in practice. Therefore, the Scheme is compliant with Policy.

3.3 West Northamptonshire Joint Core Strategy

Table 12: West Northamptonshire Joint Core Strategy Local Plan Part 1 (Adopted 2014) (WNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Policy SA – Presumption in favour of sustainable development	When considering development proposals the relevant council will take a positive approach that reflects the presumption in favour of	The Scheme will deliver wider sustainability benefits, being a renewable energy development that will make a substantial

Table 12: West Northamptonshire Joint Core Strategy Local Plan Part 1 (Adopted 2014) (WNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	sustainable development contained in the national planning policy framework. It will always work proactively with applicants jointly to find solutions which mean that proposals for sustainable development will be approved and to secure development that improves the economic, social and environmental conditions in the area. Planning applications that accord with the policies in this local plan (and, where relevant, with policies in other local plans and neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the appropriate council will grant permission unless material considerations indicate otherwise – taking into account whether: • any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the national planning policy framework taken as a whole; or	contribution to the country achieving net-zero carbon emissions. Other sustainability considerations are explained in Section 4 of this Planning Statement **[EX4/GH7.15_B]**. Due to the reduction of identified environmental effects achieved through mitigation measures, as identified in the ES, as well as the significant beneficial effects identified in Chapter 7: Climate Change of the ES **[APP-044]** as well as in Chapter 9: Ecology and Biodiversity **[REP1-033]** and ES Chapter 8: Landscape and Visual Impact **[APP-045].**

Table 12: West Northamptonshire Joint Core Strategy Local Plan Part 1 (Adopted 2014) (WNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	• specific policies in that framework indicate that development should be restricted.	
Policy S1 – The distribution of development	Development and economic activity will be distributed on the following basis: A) development will be concentrated primarily in and adjoining the principal urban area of Northampton B) appropriate development of a lesser scale will be located in and adjoining the sub-regional centre of Daventry town C) the development needs of the rural service centres of Towcester and Brackley and the rural areas will also be provided for D) new development in the rural areas will be limited with the emphasis being on: 1) enhancing and maintaining the distinctive character and vitality of rural communities; 2) shortening journeys and facilitating access to jobs and services; 3) strengthening rural enterprise and linkages between settlements and their hinterlands; and 4) respecting the quality of tranquillity.	Due to the scale of land required to deliver the substantial renewable energy generation capacity that the Scheme will provide, and the need to be in sufficient proximity of the connection point to the National Electricity Transmission System (NETS), the Scheme could not be located within an urban area or settlement boundary as explained within the Site Selection Assessment **[REP1-037]**. As explained in the SoN **[APP-556]** and summarised in Sections 4 and 6.2 of the Planning Statement **[EX4/GH7.15_B]**, the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon energy to help meet the UK's urgent need to decarbonise with solar technology, supported by government policy. As well as more recently to provide security of supply as well as affordability for end consumers. The contribution of the Scheme would make to meeting the established urgent need for renewable energy generation infrastructure warrants its location in a rural area. The Design Approach Document **[APP-560]** provides further information as to why the

Table 12: West Northamptonshire Joint Core Strategy Local Plan Part 1 (Adopted 2014) (WNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	In assessing the suitability of sites for development priority will be given to making best use of previously developed land and vacant and under-used buildings in urban or other sustainable locations contributing to the achievement of a West Northamptonshire target of 30% of additional dwellings on previously developed land or through conversions.	Scheme has been designed to mitigate the impact on the character and vitality of rural communities. Although not forming part of the DCO application, the Applicant has committed to providing a Community Benefit Fund. This is not a specific mitigation measure, but it will be available to fund local community projects, which could help enhance and maintain the distinctive character of rural communities (section 4.8 of the Planning Statement [EX4/GH7.15_B] The OCEMP **[REP1-131]**, OOEMP **[EX4/GH7.2_B]** and ODS **[REP1-135]** provide mitigation measures throughout all phases of the Scheme, which respect the quality of tranquillity throughout the region.
Policy S7 – Provision of jobs	Provision will be made for a minimum net increase of 28,500 jobs in the period 2008 – 2029 in order to maintain a broad balance between homes and jobs and to maintain a diverse economic base.	The Scheme will have a positive impact on employment in the renewable energy sector. This includes the following: • Employment during the construction phase. It is expected that 464 direct FTE jobs will be created during the construction period. During the operational phase, a gross 15 FTE staff would be employed for operation and maintenance of the site. • Diversification of local employment from a predominantly agricultural and tourism base.

Table 12: West Northamptonshire Joint Core Strategy Local Plan Part 1 (Adopted 2014) (WNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		Chapter 17: SETR of the ES **[APP-054]** includes an assessment of socio-economic impacts of the Scheme, including employment.
Policy S10 – Sustainable development principles	Development will: a) achieve the highest standards of sustainable design incorporating safety and security considerations and a strong sense of place; b) be designed to improve environmental performance, energy efficiency and adapt to changes of use and a changing climate over its lifetime; c) make use of sustainably sourced materials; d) minimise resource demand and the generation of waste and maximise opportunities for reuse and recycling; e) be located where services and facilities can be easily accessed by walking, cycling or public transport; f) maximise use of solar gain, passive heating and cooling, natural light and ventilation using site layout and building design; g) maximise the generation of its energy needs from decentralised and renewable or low carbon sources;	As detailed in Section 6.3 of the Planning Statement **[EX4/GH7.15_B]**, the Scheme has been subject to a detailed and sensitive iterative design process. This has taken account of the context and features of the land within the Order limits, nearby sensitive receptors and assets, information emerging from environmental surveys, feedback from stakeholders, and opportunities and constraints in order to develop a good design that balances the need maximise the energy generation capacity of the Scheme, with the avoidance and mitigation of impacts, and provision of environmental and other enhancements, where practicable. The design process and basis of design decisions take are described in the Chapter 5: Alternatives and Design Evolution of the ES **[APP-042]** and the Design Approach Document **[APP-560]**. Chapter 7: Climate Change of the ES **[APP-044]** sets out how the Scheme has been designed to adapt to climate change over its lifetime in line with part b). The Scheme is for the generation of solar energy to support the UK's transition to net zero, which is set out in the Statement of Need

Table 12: West Northamptonshire Joint Core Strategy Local Plan Part 1 (Adopted 2014) (WNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	h) maximise water efficiency and promote sustainable drainage; i) protect, conserve and enhance the natural and built environment and heritage assets and their settings; j) promote the creation of green infrastructure networks, enhance biodiversity and reduce the fragmentation of habitats; and k) minimise pollution from noise, air and run off.	**[APP-560]**. Therefore, the Scheme is in accordance with Part g) of the Policy. Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]** and the accompanying Flood Risk Assessment and Drainage Strategy **[REP1-054]** set out the sustainable drainage strategy for the Scheme in line with part h). The Design Approach Document **[APP-560]** sets out how the Scheme has been designed to protect, conserve and enhance the natural and built environment, including heritage assets and their settings. Therefore, the Scheme is in accordance with Part i) of the Policy. Chapter 9: Ecology and Biodiversity of the ES **[REP1-033]** and the Biodiversity Net Gain Statement **[REP1-043]** set out the enhanced biodiversity measures for the Scheme, including the significant net gains in biodiversity that the Scheme will provide. The Scheme is therefore, in accordance with part j) of the Policy. Chapter 14: Noise and Vibration **[APP-051]** and Chapter 16: Air Quality **[APP-053]** of the ES assesses the Scheme's impact on noise and air quality. The OCEMP **[REP1-131]**, OOEMP **[EX4/GH7.2_B]** and ODS **[REP1-135]** set out

Table 12: West Northamptonshire Joint Core Strategy Local Plan Part 1 (Adopted 2014) (WNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		measures for the efficient use of resources, including, where possible, the reuse and recycling of materials. Therefore, the Scheme is compliant with this Policy.
Policy S11 – Low carbon and renewable energy	Major development and sustainable urban extensions should contribute to reductions in carbon emissions and adapt to the effects of climate change through the sustainable development principles (policy s10), so as to minimise energy using sustainable design and construction, maximise energy efficiency and the provision of low carbon and renewable energy, including where feasible and appropriate, through provision of decentralised energy. Proposals should be sensitively located and designed to minimise potential adverse impacts on people, the natural environment, biodiversity, historic assets and should mitigate pollution. In addition, the location of wind energy proposals should have no significant adverse impact on amenity, landscape character and access and provide for the removal of the facilities and reinstatement at the end of operations. All new residential developments (including mixed use) are required to achieve a	As detailed in Section 6 of the Planning Statement **[EX4/GH7.15_B]** and by the Design Approach Document **[APP-560]**, the Scheme has been subject to a detailed and sensitive iterative design process, resulting in a high standard of design, as required by this Policy. This has taken account of the context and features of the land within the Order limits, nearby sensitive receptors and assets, information emerging from environmental surveys, feedback from stakeholders, and opportunities and constraints in order to develop a good design that balances the need to maximise the energy generation capacity of the Scheme, with the avoidance and mitigation of impacts, and provision of environmental and other enhancements where practicable. The design process and basis of the design decisions are described in Chapter 5: Alternatives and Design Evolution of the ES **[APP-042]**. The Concept Design Parameters and Principles **[REP1-151]** sets out design principle in section 1.3.1 for the construction, operation and

Table 12: West Northamptonshire Joint Core Strategy Local Plan Part 1 (Adopted 2014) (WNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	minimum of level 4 standard in the code for sustainable homes and to achieve the zero carbon standard from 2016 or national equivalent standard, including where appropriate a contribution to community or private energy funds. All new non-residential developments over 500m2 gross internal floorspace are required to achieve a minimum rating of at least BREEAM (BRE Environmental Assessment Method) very good standard (or equivalent) or any future national equivalent zero carbon standard from 2019. These requirements will apply unless it can be demonstrated that they would make the development unviable.	maintenance and decommissioning of the project. One of the principles is for the Scheme's design to retain a degree of flexibility to enable it to adapt over time, be functional and fit for purpose, and respond to innovative and new technologies as well as building resilience to climate change. Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]** 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 accordance with the Outline OCEMP **[REP1-131]**, OOEMP **[EX4/GH7.2_B]** and the ODS) **[REP1-135].** As explained by the Design Approach Document **[APP-560]**, the design of the Scheme and its components will be sensitive to its surroundings. Maximum height parameters seek to deliver a scheme that integrates with its surroundings, whilst delivering the technical requirements that enable the efficient generation of a large amount of electricity. For example: the maximum heights of solar arrays have been designed to deliver the technical requirements whilst enabling effective screening by hedgerows. The extent and layout of the Scheme is also sensitive to landscape character and locating

Table 12: West Northamptonshire Joint Core Strategy Local Plan Part 1 (Adopted 2014) (WNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		the largest structures in the less tranquil and most well screened areas of the Order limits. As explained by the Design Approach Document **[APP-560]**, the design of the Scheme has been sensitive to the visual amenity of residential properties and the setting of heritage assets, incorporating stand-offs between these and PV Arrays where to mitigate potential impacts. The OCEMP **[REP1-131]**, OOEMP **[EX4/GH7.2_B]** and ODS **[REP1-135]** set out measures for the efficient use of resources, including, where possible, the reuse and recycling of materials.
Policy C3 – Strategic Connections	The priorities to retain and enhance West Northamptonshire's strategic connections for economic advantage are to work in partnership with, and support the relevant transport providers in order to secure the following initiatives: 1. <u>Rail</u> a) An enhanced service in terms of journey time and frequency of passenger rail services between London and Birmingham (via Northampton Castle Station).	Policy C3 cites improvements to the A43. The Cable Route Corridor does cross the A43, linking Northampton to Kettering. However, the Cable Route Corridor is to be located below ground in order to minimise impacts on the road network. Chapter 13: Transport and Access **[EX2/GH6.2.13_A]** assess the potential transport and access impacts of the Scheme during the construction, operation, maintenance and decommissioning phases. This includes assessing the impact on the A14, A45, A43, A428 and A509.

Table 12: West Northamptonshire Joint Core Strategy Local Plan Part 1 (Adopted 2014) (WNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	b) The introduction of additional rail services to the wider north west for passenger and freight movements along the M6 corridor to relieve congestion on the road network. c) Implementation of an inter-urban coach service to connect to the Midland mainline and improved journey times/connections to access East Midlands Airport. d) The enhancement of rail connections to the Daventry International Rail Freight Terminal to encourage the movement of goods by rail. 2. <u>Road</u> The necessary road improvements to support strategic connectivity are the implementation of: a) M1 Junction 14019 managed motorway including hard shoulder running. b) Traffic management measures and related junction modifications on the A45 and A43 trunk roads in conjunction with development coming forward in the corridors including the	The accompanying Transport Assessment **[APP-151]** confirms that there will not be a significant percentage change in the number of daily vehicle trips on the above A roads. Therefore, the Scheme is in accordance with this Policy.

Table 12: West Northamptonshire Joint Core Strategy Local Plan Part 1 (Adopted 2014) (WNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	M1/A45 Northampton Growth Management Scheme. c) A43 Kettering to Northampton improvements. 3. <u>Water</u> Support will be given to proposals to use the canal network for freight movements.	
Policy BN1 – Green infrastructure connections	Green infrastructure corridors of sub-regional and local importance as set out in Figure 6 of the joint core strategy will be recognised for their important contribution to sense of place and conserved, managed and enhanced by: 1) incorporating existing and identified future networks into new development proposals; 2) securing contributions from development or other sources for the creation of and future management of the green infrastructure networks; 3) delivering long term management strategies for the sub-regional and local network. Measures to enhance existing and provide new green infrastructure provision will: a) be designed and delivered sustainably with prudent use of natural resources;	The Scheme does cross the local Green Infrastructure 15 (Sywell Reservoir to Broughton). As explained by the Design Approach Document **[APP-560]**, the design of the Scheme has been sensitive to its landscape. The Scheme has taken other opportunities to provide enhancements, including by providing and connecting green infrastructure (as set out in the OLEMP) **[REP1-137]**. ES Chapter 8: LVIA **[APP-045]** confirms that the Scheme will have a significant moderate beneficial effect on the landscape fabric at Year 15 of operation due to the provision of landscape enhancements. These landscape enhancements include (amongst many others) 14.45ha of green corridors and woodland planting.

Table 12: West Northamptonshire Joint Core Strategy Local Plan Part 1 (Adopted 2014) (WNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	b) mitigate and adapt to the effects of climate change including through improved flood risk management and as a carbon store; c) be designed to the highest quality in terms of appearance, access provision and biodiversity enhancement and protection; d) reflect local character through the planting of native and other climate appropriate species and consideration of natural and cultural heritage features; e) be supported by a long-term management strategy.	Therefore, the Scheme is in accordance with this policy.
Policy BN2 – Biodiversity	Development that will maintain and enhance existing designations and assets or deliver a net gain in biodiversity will be supported. Development that has the potential to harm sites of ecological importance will be subject to an ecological assessment and required to demonstrate: • The methods used to conserve biodiversity in its design and construction and operation • How habitat conservation, enhancement and creation can be achieved through linking habitats	Assessment of Ecological impacts is set out in ES Chapter 9: Ecology and Biodiversity **[REP1-033]**. It confirms that no significant effect will occur on designated receptor sites in terms of ecology. A Biodiversity Net Gain (BNG) Assessment, using Defra's Metric 4.0 has been provided within the DCO application **[REP1-043]**. This sets out the significant net gains in biodiversity that the Scheme will provide. The Scheme has taken advantage of opportunities to conserve and enhance biodiversity and accords with this policy. The Scheme has therefore incorporated improvements in biodiversity and accords with

Table 12: West Northamptonshire Joint Core Strategy Local Plan Part 1 (Adopted 2014) (WNJCS)		
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	• How designated sites, protected species and priority habitats will be safeguarded Development management decisions will reflect the hierarchy of biodiversity and geodiversity designations attaching appropriate weight to the status of the site which would be affected. In cases where it can be shown that there is no reasonable alternative to development that is likely to prejudice the integrity of an existing wildlife site or protected habitat appropriate mitigation measures including compensation will be expected in proportion to the asset that will be lost. Where mitigation or compensation cannot be agreed with the relevant authority development will not be permitted.	this policy. See also Section 6.9 of the Planning Statement **[EX4/GH7.15_B]** for further detail on the biodiversity measures incorporated and compliance with planning policy.
Policy BN3 – Woodland enhancement and creation	Measures to enhance and manage existing woodlands and create new woodlands in West Northamptonshire will be supported. Opportunities will be sought to create new woodland to buffer, extend and relink areas of ancient woodland which have become fragmented. The protection of aged or veteran trees outside ancient woodlands will also be supported. Development that would lead to further fragmentation or result in a loss of ancient woodland, aged and veteran trees will not be permitted unless the need for, and	The Scheme does not incorporate or propose the loss of any Ancient Woodlands or Veteran Trees.

Table 12: West Northamptonshire Joint Core Strategy Local Plan Part 1 (Adopted 2014) (WNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	benefits of, the development in that location clearly outweigh the loss. Woodland enhancement and creation along the Yardley Whittlewood ridge from the village of Yardley Hastings towards Towcester and Brackley will be prioritised in recognition of its importance to the character and biodiversity of West Northamptonshire.	
Policy BN4 – Upper Nene Valley Gravel Pits Special Protection Area	New development will need to demonstrate through the development management process that there will be no significant adverse effects upon the integrity of the special protection area and Ramsar site and the species for which the land is designated including the loss of supporting habitat and impacts due to water runoff, water abstraction or discharges from the foul drainage system either as a direct result of the development alone or in combination. New development will need to demonstrate that the impact of any increased recreational activity (indirect or direct) on the special protection area and Ramsar site will not have a detrimental impact. Any development that will lead to an increase in recreational activity on the special protection area will be required to include necessary mitigation including	No development is proposed on the Upper Nene Valley Pits Special Protection Area. The BESS adjacent to the Grendon National Grid Station is in proximity to the Upper Nene Valley Pits Special Protection Area. Chapter 9: Ecology and Biodiversity of the ES **[REP1-033]** has assessed in section 9.9.2 the impact on the development on the Upper Nene Valley Special Protection Area. Given that embedded mitigation measures will minimise any potential impacts from pollution on the SPA during the construction phase, it is considered that all reasonable steps will be taken to ensure that **no significant adverse effects** will occur during the construction phase. Additionally, embedded mitigation measures to minimise the likelihood and severity of battery fire have been incorporated into the Scheme, including the implementation of fire suppression

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	development of and implementation of habitat and access management plans. In order to protect sightlines for birds included within the special protection area and Ramsar site designations, new development within a 250m zone of the special protection area shown in Figure 7 of the joint core strategy must undertake an assessment to demonstrate that it will not have a significant adverse effect on birds within the Clifford Hill Basin or, if directly adjacent to existing buildings, should reflect surrounding building heights.	systems, with containment measures in place to manage runoff in the event of a fire. The risk of a fire and measures to mitigate impacts in the event of a fire are detailed in the Outline Battery Storage Safety Management Plan **(OBSSMP) [REP1-143].** These are discussed in more detail in other ES chapters: Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]**, and Chapter 22: Ground Conditions and Contamination **[REP1-025].** Given that embedded mitigation measures will minimise the risk of any potential impacts from pollution on the SPA during the operational phase, it is considered that **no significant adverse effects** will occur.
Policy BN5 – The historic environment and landscape	Designated and non-designated heritage assets and their settings and landscapes will be conserved and enhanced in recognition of their individual and cumulative significance and contribution to West Northamptonshire's local distinctiveness and sense of place. In environments where valued heritage assets are at risk, the asset and its setting will be appropriately conserved and managed. In order to secure and enhance the significance of the area's heritage assets and their settings and landscapes, development in areas of landscape sensitivity and/ or known	Chapter 12: Cultural Heritage of the ES **[APP-049]** provides an assessment of the Scheme on the historic environment, including above, at, and below ground assets. A proportion of the Site, including the proposed BESS and proposed cable routes, adjacent to the Grendon National Grid Sation is within Nene Valley. The design of the Scheme has sought to minimise harm to heritage assets. Chapter 12: Cultural Heritage of the ES **[APP-049]** concludes there would be no significant impacts to any designated or non-designated heritage

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	historic or heritage significance will be required to: 1. Sustain and enhance the heritage and landscape features which contribute to the character of the area including: a) conservation areas; b) significant historic landscapes including historic parkland, battlefields and ridge and furrow; c) the skyline and landscape settings of towns and villages; d) sites of known or potential heritage or historic significance; e) locally and nationally important buildings, structures and monuments 2. Demonstrate an appreciation and understanding of the impact of development on surrounding heritage assets and their setting in order to minimise harm to these assets; where loss of historic features or archaeological remains is unavoidable and justified, provision should be made for recording and the production of a suitable archive and report 3. Be sympathetic to locally distinctive landscape features, design styles and	assets as a result of the Scheme once embedded and additional mitigation measures are implemented. There are no Conservation Areas, Scheduled Monuments, Listed Buildings or Registered Parks and Gardens located within the Order Limits. The design of the BESS has been considered. The Design Approach Document **[APP-560]** states that whilst care has been given to exclude areas of greater landscape and ecological value from the Order limits, there are a number of valuable landscape features, such as woodland blocks and watercourses, that are within, bordered by, or encircled by the Order limits. The Scheme has therefore sought to avoid and reduce effects on such elements through adherence to minimum offsets and seeks to enhance these where practicable. These offsets have been determined through baseline ecological and landscape assessments and are secured through the Works Plans **[REP3-008],** Concept Design Parameters and Principles **[REP1-151],** and the OLEMP **[REP1-137].** The design of the Scheme will be sensitive to above and below ground heritage assets and their setting by locating infrastructure at a suitable distance and through appropriate landscape screening. The Scheme's design will

Table 12: West Northamptonshire Joint Core Strategy Local Plan Part 1 (Adopted 2014) (WNJCS)		
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	materials in order to contribute to a sense of place The retention and sensitive re-use of disused or underused heritage assets and structures is encouraged in order to retain and reflect the distinctiveness of the environment, contribute to the sense of place and promote the sustainable and prudent use of natural resources. Proposals to sustain and enhance the area's understanding of heritage assets, for tourism and historic interest as part of cultural, leisure and green networks will be supported.	include suitable setbacks and buffers, such as screening and planting, in appropriate locations between solar infrastructure and heritage assets, in order to minimise harm to heritage assets and their setting. The Scheme will seek to minimise harm through the avoidance of below ground archaeological assets where practicable which will be identified through geophysical surveys and targeted trial trenching. The Applicant identified a number of key design objectives. These objectives have been formulated to align with guidance published by the National Infrastructure Commission, Solar Energy UK and BRE.
Policy BN7 – Flood risk	Development proposals will comply with flood risk assessment and management requirements set out in the national planning policy framework and planning practice guidance and the West Northamptonshire strategic flood risk assessments to address current and future flood risks with appropriate climate change allowances. A sequential approach will be applied to all proposals for development in order to direct development to areas at the lowest probability of flooding unless it has met the requirements	Flood Risk Assessments (FRA) are provided at **ES Appendices 10.1 to 10.10 [APP-097 to APP-107]**. The FRA provides a detailed assessment of the risk of flooding to and from the Scheme (taking account of climate change) and concludes that the risk of flooding will not be increased as a result of the construction, operation or decommissioning of the Scheme A Sequential Test and an Exception Test have been provided as Appendix B of the Planning Statement **[EX4/GH7.15_B]**. The Applicant considers that the Scheme passes the Sequential Test requirements.

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	of the sequential test and the exception test as set out within table 6. All new development, including regeneration proposals, will need to demonstrate that there is no increased risk of flooding to existing properties, and proposed development is (or can be) safe and shall seek to improve existing flood risk management. All proposals for development of 1 hectare or above in flood zone 1 and for development in 2, 3a or 3b must be accompanied by a flood risk assessment that sets out the mitigation measures for the site and agreed with the relevant authority. A flood risk assessment must also accompany proposals where it may be subject to other sources, and forms, of flooding or where other bodies have indicated that there may be drainage problems. In order to meet the exception test development must: 1) demonstrate that the development provides wider sustainability benefits to the community that outweigh the flood risk; 2) be located on previousley developed land; and	Given that the Scheme falls within areas of Flood Zone 3, the Scheme has been subject to the Exception Test. It has been concluded that the Scheme meets the requirements of the Exception Test. A detailed drainage strategy, to be substantially in accordance with the Outline Drainage Strategy which forms part of the Flood Risk Assessment **[REP1-053]**, is secured through the draft DCO **[REP3-024]**.

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	3) be accompanied by a site specific flood risk assessment that demonstrates that the development will be safe for its lifetime without increasing flood risk elsewhere and where possible, reduce flood risk overall Where flood risk management requires the use of sustainable drainage systems to manage surface water run off, these should: A) separate surface water from foul and combined sewers; B) be accompanied by a long term management and maintenance plan; and C) protect and enhance water quality. The design standard for the Upper Nene catchment (through Northampton and within the Nene catchment upstream of Northampton) is the 0.5% probability (1 in 200 chance of occurring in any year) event plus climate change. Surface water attenuation should be provided up to this standard.	
Policy BN8 – The River Nene strategic river corridor	The natural and cultural environment of the Nene corridor through the plan area, including its tributaries, will be enhanced and protected in recognition of its important contribution to the area's green infrastructure network, landscape, townscapes, regeneration, recreation and historic environment.	The integration of green infrastructure into the design of the Scheme is explained in the Design Approach Document **[APP-560]**, The implementation of the provision of and enhancement to green infrastructure is set out in the Outline Landscape and Ecological

Table 12: West Northamptonshire Joint Core Strategy Local Plan Part 1 (Adopted 2014) (WNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	Proposals for new development and habitat enhancement should demonstrate an understanding of the importance of the River Nene for biodiversity within and beyond the plan area.	Management Plan **[REP1-137]**, to be secured through the draft DCO **[REP3-024]**.
Policy BN9 – Planning for pollution control	Proposals for new development which are likely to cause pollution or likely to result in exposure to sources of pollution or risks to safety will need to demonstrate that they provide opportunities to minimise and where possible reduce pollution issues that are a barrier to achieving sustainable development and healthy communities including: A) maintaining and improving air quality, particularly in Poor air quality areas, in accordance with national air quality standards and best practice; B) protecting and improving surface and groundwater water quality; C) minimising light pollution; D) ensuring remediation of contaminated land so as not to pose a risk to health and the environment; and E) reducing the adverse impacts of noise.	An assessment of the impact of the Scheme on air quality is provided in ES Chapter 16: Air Quality **[APP-053]**. A detailed drainage strategy, to be substantially in accordance with the Outline Drainage Strategy which forms part of the Flood Risk Assessment **[REP1-053]**, is secured through the draft DCO **[REP3-024]**. The potential light pollution impacts of the Scheme are considered in ES Chapter 24: Other Environmental Matters **[REP1-027]**. The Applicant's approach to contaminated land risks is set out in ES Chapter 22: Ground Conditions and Contamination **[REP1-025]**. The Applicant's approach to mitigation of noise impacts is set out in ES Chapter 14: Noise and Vibration **[APP-051]**.

Table 12: West Northamptonshire Joint Core Strategy Local Plan Part 1 (Adopted 2014) (WNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	Development that is likely to cause pollution, either individually or cumulatively, will only be permitted if measures can be implemented to minimise pollution to a level which provides a high standard of protection for health and environmental quality.	
Policy BN10 – Ground instability	Development will be permitted on sites of unstable or potentially unstable land provided that: 1) the nature of the ground stability of the site has been assessed to the satisfaction of the determining planning authority and a ground stability report has been provided and agreed before the application is determined; 2) the development does not add to the instability of the site or surrounding land; 3) any required remedial works are implemented prior to occupation of development; and 4) the development of any required stabilisation measures are environmentally acceptable to the satisfaction of the determining authority. The ground stability report will be required to demonstrate that:	The suitability of the land for the Scheme is assessed in ES Chapter 22: Ground Conditions and Contamination **[REP1-025]**.

Table 12: West Northamptonshire Joint Core Strategy Local Plan Part 1 (Adopted 2014) (WNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	a) the degree of instability has been assessed; b) measures to mitigate against the risk have been identified; c) a schedule of mitigation measures is in place; d) a programme for routine monitoring is in place; and e) any need for formal environmental assessment arising from any stabilisation works has been identified.	
Policy INF1 – Approach to infrastructure delivery	New development will be supported by, and provide good access to, infrastructure, including physical, green and social elements. It will integrate with and complement adjoining communities. Where development generates a need for new infrastructure developers will need to demonstrate that provision will be made to meet the necessary requirements arising from that development within an appropriate timescale. In assessing capacity, developers will provide evidence as to whether existing infrastructure can be used more efficiently, or whether the	The Scheme will provide ecological and community infrastructure. The integration of green infrastructure into the design of the Scheme is explained in the Design Approach Document **[APP-560]**, The implementation of the provision of and enhancement to green infrastructure is set out in the OLEMP **[REP1-137]**, to be secured through the draft DCO **[REP3-024]**. The Scheme will provide a significant Net Gain for biodiversity. Post development, the Sites will comprise the following proposed landscaping habitats: enhancement of existing hedgerows and ditches, native hedgerow with trees, native shrub planting, woodland planting, native scattered trees, long term meadow creation

Table 12: West Northamptonshire Joint Core Strategy Local Plan Part 1 (Adopted 2014) (WNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	impact of development can be reduced through promoting behavioural change.	(partially panelled), flower rich pollinator mix, tall herb mix, tussock mix, set aside, diverse meadow mix, proposed wildlife ponds, and enhancement of existing ponds. The detailed assessment is set out in the Biodiversity Net Gain Report **[REP1-043]**. A number of new permissive paths for pedestrians will be created within or adjacent to Sites Green Hill A, Green Hill A.2, Green Hill D, Green Hill E, Green Hill F and Green Hill G. In addition, a permissive path for horse riders will be created within Green Hill A, and an existing hacking route for horse riders around 6 fields within Green Hill F will be retained and improved. The design and implementation of the permissive paths is set out in the Landscape and Ecology Mitigation Plans **[REP3-042, REP3-044, APP-209, REP3-046, APP-211, REP3-048, REP3-050, APP-214, APP-215, REP3-052, APP-217, REP3-054, APP-219]** and OLEMP **[REP1-137]** and secured by a Requirement in the Draft DCO **[REP3-024]**.
Policy INF2 – Contributions to infrastructure requirements	New development will only be permitted if the necessary on and off-site infrastructure that is required to support it, and mitigate its impact, is either already in place, or there is a reliable mechanism in place to ensure that it will be delivered.	Necessary infrastructure will be secured by a Requirement in the Draft DCO **[REP3-024]**.

Table 12: West Northamptonshire Joint Core Strategy Local Plan Part 1 (Adopted 2014) (WNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	Provision made through planning obligations may seek pooled contributions where the combined impact of a number of developments creates the need for infrastructure and where a direct relationship between the development and the infrastructure has been demonstrated. For other site specific needs direct provision will need to be made, either through the imposition of planning conditions or secured through a planning obligation, with the relevant local planning authority.	
Policy R2 – Rural economy	Proposals which sustain and enhance the rural economy by creating or safeguarding jobs and businesses will be supported where they are of an appropriate scale for their location, respect the environmental quality and character of the rural area and protect the best and most versatile agricultural land. The following types of development are considered to be acceptable: a) the re-use of rural buildings; b) schemes for farm diversification involving small-scale business and commercial development that contribute to the operation and viability of the farm holding;	The temporary employment generated by the Scheme's construction is assessed to be approximately 464 direct FTE jobs per annum as set out within Section 17.5.2 of ES Chapter 17: Socio Economics, Tourism and Recreation **[APP-054]**. During its operational lifetime, the Scheme is anticipated to generate a modest quantum of labour, related to ongoing operational management and site management. It is projected that the Scheme will require a gross 15 FTE direct employees per annum as set out within Section 17.5.19 of ES Chapter 17: Socio Economics, Tourism and Recreation **[APP-054]**.

Table 12: West Northamptonshire Joint Core Strategy Local Plan Part 1 (Adopted 2014) (WNJCS)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	c) small-scale tourism proposals, including visitor accommodation; d) proposals that recognise the economic benefits of the natural and historic environment as an asset to be valued, conserved and enhanced; e) the expansion of businesses in their existing locations, dependent upon the nature of the activities involved, the character of the site and its accessibility; f) small scale employment development to meet local needs; and g) the use of land for agriculture, forestry and equestrian activity.	A Skills, Supply Chain and Employment Plan will be prepared prior to the commencement of construction. This will set out measures that the Applicant will implement to advertise and promote employment and training opportunities associated with the Scheme in construction and operation locally. It will be secured through a requirement included in the DCO for the Scheme. The OSSCEP **[APP-552]** forms the basis for this.

3.4 Daventry Local Plan Part 2

Table 13: Daventry Local Plan 2011-2029 Part 2 (Adopted 2020) (DLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
SP1 – Daventry District Spatial Strategy	To ensure a sustainable pattern of development to meet the overall spatial strategy of the West Northamptonshire Joint Core Strategy, sustainable development in Daventry District will be guided by the following spatial principles: A. Focusing development at Daventry town to deliver its regeneration and reinforce its role as the sub-regional	Due to the scale of land required to deliver the substantial renewable energy generation capacity that the Scheme will provide, and the need to be in sufficient proximity of the connection point to the National Electricity Transmission System (NETS), the Scheme could not be located

Table 13: Daventry Local Plan 2011-2029 Part 2 (Adopted 2020) (DLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	centre of West Northamptonshire and its ability to support the surrounding communities; B. Allowing for development that is consistent with the approach relating to the Northampton Related Development Area in policy S4 of the WNJCS; C. Promoting a vibrant economy through encouraging the regeneration of Daventry Town Centre and protecting and enhancing a network of identified employment areas at the town and across the rural area; D. Supporting the development of Daventry District's learning infrastructure to raise educational achievement and the skills base of our communities; E. Protecting and enhancing existing services and facilities within the District's villages through allowing development to meet their identified housing needs; F. Ensuring that development promotes healthy and active lifestyles through encouraging the use of sustainable transport modes and protecting and enhancing a network of green infrastructure and open space; G. Protecting and enhancing the built and natural environment and the District's heritage assets, including protecting the Open Countryside; H. Encouraging an efficient use of previously developed land, including ensuring that unused and vacant	within an urban area or settlement boundary as explained within the Site Selection Assessment **[REP1-037]**. As explained in the Statement of Need **[APP-556]** and summarised in Sections 4 and 6 of the Planning Statement **[EX4/GH7.15_B]**, the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon energy to help meet the UK's urgent need to decarbonise with solar technology, supported by government policy. As well as more recently to provide security of supply as well as affordability for end consumers.

Table 13: Daventry Local Plan 2011-2029 Part 2 (Adopted 2020) (DLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	buildings are brought back into a use appropriate to their location.	
RA6 – Open Countryside	The intrinsic character, beauty and tranquillity of the open countryside of the District will be recognised. To achieve this, in the open countryside outside the confines of villages, the following forms of development only will be supported: i. Development, including the re-use or conversion of existing buildings, essential to ensure the continuing function of a rural business that meets the requirements of Policy HO6 (Rural Worker Dwelling); or ii. The replacement of an existing building of the same general size, massing and bulk predominantly on the same footprint, for the same use, that respects the character of its rural surroundings; or iii. Individual dwellings of exceptional quality or innovative design; or iv. The optimal viable use of a heritage asset; or v. The re-use of redundant or disused buildings that lead to an enhancement to the immediate setting; or vi. Extensions to existing buildings that respect their form and character; or vii. Essential investment in infrastructure including utilities; or	The use of previously developed (brownfield) land and commercial roof-tops was considered. There was no brownfield land that meets the minimum individual site size threshold nor the area of approximately 1,100 ha required for a network of sites in proximity for the Scheme, identified within the 20km search area from the Grendon Substation Point of Connection. The Site Selection Assessment is set out in Appendix 5.1 of the ES **[REP1-037]**. Although ES Chapter 8: Landscape and Visual **[APP-045]** acknowledges that there will be an adverse effect on the landscape, there is an need to create and secure and affordable energy system to help combat climate change. In addition, Chapter 8: Landscape and Visual **[APP-045]** confirms that there will be a significant moderate benefit on the landscape fabric at Year 15 of operation and on decommissioning of the Scheme, due to the implementation of mitigation planting, which will be maintained.

Table 13: Daventry Local Plan 2011-2029 Part 2 (Adopted 2020) (DLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	viii. Development for agriculture, equestrian, forestry, leisure, community or tourism use that is justified and of an appropriate scale for its location, and has no significant adverse impacts on its character, beauty and tranquillity; or ix. Economic development that otherwise accords with policy EC4 or policy R2 of the West Northamptonshire Joint Core Strategy; or x. Lorry parking provision that otherwise accords with policy ST2; or xi. Development that otherwise accords with policies RA1, RA2 and RA3; or xii. A rural exception site which complies with policy H3 of the West Northamptonshire Joint Core Strategy and where appropriate policy HO7.	Therefore, the Scheme is in accordance with this policy.
ENV1 – Landscape	A. The Council will support proposals that maintain the distinctive character and quality of the District's landscapes, as defined in the Daventry District Landscape Character Assessment 2017. In doing so, it will take into consideration the cumulative impact of development proposals on the quality of the landscape. B. Where appropriate, applicants will be expected to demonstrate that their proposal: i. Respects the local distinctiveness and historic character of the particular landscape character area in which it is located; and	Although ES Chapter 8: Landscape and Visual **[APP-045]** acknowledges that there will be an adverse effect on the landscape, there is an need to create and secure and affordable energy system to help combat climate change. In addition, Chapter 8: Landscape and Visual **[APP-045]** confirms that there will be a significant moderate benefit on the landscape fabric at Year 15 of operation and on decommissioning of the Scheme,

Table 13: Daventry Local Plan 2011-2029 Part 2 (Adopted 2020) (DLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	ii. Respects existing patterns of development and distinctive features that make a positive contribution to the character, history or setting of a settlement or area such as key buildings, village skylines and ridgelines; and iii. Avoids creating hard developed edges to the open countryside; and iv. Avoids physical and visual coalescence between settlements; and v. Enhances and restores landscape features where the opportunity arises; and vi. Incorporates mitigation measures to integrate development into its surroundings and enhance or restore the local landscape. C. Development proposals should include, where appropriate to their scale, use and location, an assessment of the likely visual impacts on the local landscape and the site's immediate and wider setting. This will include the landscape capacity of the site's immediate and wider setting to accommodate the development in accordance with the Daventry District Landscape Character Assessment and the Council's Landscape Assessment Toolkit. Applications for major developments and where the Council identifies that a proposal would have an adverse impact on the landscape, may require a full landscape and visual	due to the implementation of mitigation planting, which will be maintained. Therefore, the Scheme is in accordance with this policy. The submission is accompanied by an OLEMP **[REP1-137]**. This sets out the framework for the planting, management and monitoring of landscaping and ecological mitigation and enhancements habitats for the Scheme's construction and operational phases, to accord with Part E of the Policy.

Table 13: Daventry Local Plan 2011-2029 Part 2 (Adopted 2020) (DLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	impact assessment, which should be submitted as part of the planning application. D. Proposals that would cause landscape harm will be required to demonstrate that the harm can be successfully mitigated through an appropriate landscape treatment in keeping with the landscape character area. E. Provision should be made for the long term management and maintenance (minimum of five years) of new landscape proposals to ensure their establishment. F. The identification of local landscape designations in neighbourhood development plans will be supported.	
ENV4 – Green Infrastructure	The Council will protect, enhance and restore the District's green infrastructure assets in order to create a comprehensive network that contributes to the full range of ecosystem services including quality of life, biodiversity, sustainable transport and climate change mitigation by: i. Working with partners, including neighbouring authorities and the Local Nature Partnership, to plan for green infrastructure at a landscape scale. In particular, proposals will be supported that would contribute to the aims and objectives of the Nene Valley Nature Improvement Area project on habitat restoration, creation and connectivity; ii. Supporting proposals that protect, enhance and restore the existing green infrastructure network of sub-	The integration of green infrastructure into the design of the Scheme is explained in the Design Approach Document **[APP-560]**, The implementation of the provision of and enhancement to green infrastructure is set out in the OLEMP **[REP1-137]**, to be secured through the draft DCO **[REP3-024]**. The Scheme will provide a significant Net Gain for biodiversity. Post development, the Sites will comprise the following proposed landscaping habitats: enhancement of existing hedgerows and ditches, native hedgerow with trees, native shrub planting, woodland planting, native scattered trees, long term meadow

Table 13: Daventry Local Plan 2011-2029 Part 2 (Adopted 2020) (DLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	regional and local corridors identified in the WNJCS. Proposals will be expected to demonstrate how they would achieve this and in the case of new green infrastructure, how they would link into the existing networks; iii. Strategic development sites should be masterplanned as a whole to show the location of new on-site strategic green infrastructure and how it relates to the wider network. Proposals should not lead to fragmentation of a green infrastructure link; iv. Supporting proposals that avoid fragmentation of green links and that would reconnect existing gaps in provision; v. Supporting proposals that protect, connect and extend the local green links and network of green infrastructure within and around Daventry town and that limit any loss to that necessary to accommodate infrastructure improvements required to deliver allocated sites, subject to such loss being mitigated to achieve a net enhancement in green infrastructure provision; and vi. Supporting the recognition of important green infrastructure including designation within neighbourhood development plans.	creation (partially panelled), flower rich pollinator mix, tall herb mix, tussock mix, set aside, diverse meadow mix, proposed wildlife ponds, and enhancement of existing ponds. The detailed assessment is set out in the Biodiversity Net Gain Report **[REP1-043]**.
ENV5 – Biodiversity	A. The Council will support proposals that conserve and enhance designated and undesignated sites and species of national and local importance for biodiversity and geodiversity and contribute towards a resilient ecological network. The level of protection should be proportionate	The ecological impacts of the Scheme are assessed within Chapter 9: Ecology and Biodiversity **[REP1-033]**.

Table 13: Daventry Local Plan 2011-2029 Part 2 (Adopted 2020) (DLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	to the site's designation status, the contribution it makes to the ecological network and take account of considerations set out below: • Sites of national importance Sites of Special Scientific Interest (SSSI) are of national importance and development affecting them will be expected to avoid causing adverse effects, unless, in exceptional circumstances, it can be demonstrated that the benefits of the development clearly outweigh the nature conservation value or scientific interest of the site and its wider contribution to the biodiversity network. • Sites of local importance Development affecting sites of local importance for biodiversity and geodiversity including Local Nature Reserves (LNRs), Local Wildlife Sites (LWSs) and Local Geological Sites (LGeS), will be expected to avoid causing adverse effects unless it can be demonstrated that the benefits of development outweigh the harm and where measures to mitigate the harm can be put in place. Development that would result in the loss or deterioration of such sites or habitats that are irreplaceable will not be supported unless the need for and benefits of the development in that location clearly outweigh the loss. • Undesignated sites Development affecting sites that are not formally designated but which make a positive contribution to	The Scheme will provide a significant Net Gain for biodiversity. Post development, the Sites will comprise the following proposed landscaping habitats: enhancement of existing hedgerows and ditches, native hedgerow with trees, native shrub planting, woodland planting, native scattered trees, long term meadow creation (partially panelled), flower rich pollinator mix, tall herb mix, tussock mix, set aside, diverse meadow mix, proposed wildlife ponds, and enhancement of existing ponds. The detailed assessment is set out in the Biodiversity Net Gain Report **[REP1-043]**.

Table 13: Daventry Local Plan 2011-2029 Part 2 (Adopted 2020) (DLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	biodiversity will be required to take into account their current or potential role in the District's wider biodiversity network. B. All proposals likely to affect biodiversity will be expected to assess their impact through an ecological assessment and include details of mitigation or compensation, where harm will be caused. The level of detail of the assessment will be proportionate to the significance of the asset and the scale of the proposal. If significant harm cannot firstly be avoided, adequately mitigated or as a last resort, compensated for, or should a proposal lead to the loss or deterioration of irreplaceable habitats, then development will not be permitted. C. Proposals should seek to achieve a net gain for biodiversity, including the creation and management of new habitats, strengthening existing networks of habitats, avoiding the fragmentation of habitats and links and addressing the Northamptonshire Biodiversity Action Plan local priorities for habitats and species. D. Proposals should comply with the principles set out in the Biodiversity Supplementary Planning Document for Daventry District to ensure that biodiversity and the impact of development on biodiversity is given appropriate consideration.	
ENV7 – Historic Environment	A. Proposals affecting the historic environment must demonstrate a clear understanding of any potential impact on the significance of heritage assets and their	Chapter 12: Cultural Heritage of the ES **[APP-049]** provides an assessment of the Scheme on the historic environment,

Table 13: Daventry Local Plan 2011-2029 Part 2 (Adopted 2020) (DLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	setting; any description of significance and the contribution of setting should be proportionate to the asset's importance. As a minimum the Northamptonshire Historic Environment Record should be consulted. B. In decision making, great weight should be given to the conservation of heritage assets irrespective of the level of harm. The more important the asset, the greater the weight will be. C. Any harm to a designated heritage asset requires clear and convincing justification. Proposals that lead to substantial harm to or total loss of a designated heritage asset, or less than substantial harm to a designated heritage asset will be judged against the tests in the NPPF. D. The Council will seek to sustain and enhance the historic environment of the District by supporting: i. High quality proposals that respond positively to their context by reinforcing local distinctiveness including street pattern, siting, form, scale, mass, use, materials and architectural features. Proposals should have regard to other design policies and supplementary planning documents that have been adopted by the Council; ii. Proposals that make a positive contribution to, or which better reveal the significance of designated heritage assets; iii. Proposals that would conserve designated assets identified as being at risk. The Council will seek to	including above, at, and below ground assets. A proportion of the Site, including the proposed BESS and proposed cable routes, adjacent to the Grendon National Grid Substation is within Nene Valley. Chapter 12: Cultural Heritage of the ES **[APP-049]** concludes there would be no significant impacts to any designated or non-designated heritage assets as a result of the Scheme once embedded and additional mitigation measures are implemented. Following the implementation of embedded mitigation as detailed in Section 12.7 and additional mitigation as detailed in Section 12.9 significant effects have been identified at four designated heritage assets. Otherwise, no other significant effects have been identified. The design of the BESS has been considered. The Design Approach Document **[APP-556]**

Table 13: Daventry Local Plan 2011-2029 Part 2 (Adopted 2020) (DLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	proactively engage with owners of such assets to find solutions that will safeguard and secure the future of the asset, including where appropriate, their viable adaptation and re-use compatible with their character and significance; iv. Proposals affecting conservation areas that would sustain or enhance those elements that have been identified as making a positive contribution to the character and special architectural or historic interest of the area. Proposals that respond positively to the opportunity to enhance neutral or detracting elements of a conservation area, as identified through conservation area appraisals and management plans, will particularly be supported; v. Proposals that sustain or enhance key views of heritage assets and key views into and out of conservation areas identified in conservation area appraisals, landscape characterisation, neighbourhood development plans and village design statements; vi. Proposals that sustain or enhance traditional shopfronts, including the restoration of historic features and the sympathetic use of high quality fascia and projecting signs; vii. Proposals that are sympathetic to non-designated heritage assets (identified through a conservation area appraisal or other method) and their setting including their retention and re-use. In doing so, the impact of the	

Table 13: Daventry Local Plan 2011-2029 Part 2 (Adopted 2020) (DLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	scale of any harm or loss on the significance of the assets will be taken into consideration.	
ENV9 – Renewable Energy and Low Carbon Development	A. Proposals for renewable energy development will be supported where, with appropriate mitigation, they do not have an adverse impact on any of the following; i. Form, character and setting of an existing settlement; ii. Heritage assets and in particular on views important to their setting; iii. Biodiversity and ecology; iv. The landscape including the cumulative impact with existing or approved renewable energy development; v. Residential amenity; and vi. The enjoyment of the open countryside including public rights of way. B. Where appropriate and viable, new development should utilise the availability of any local energy network, such as combined heat and power (CHP) system or generate their own energy from low carbon technology. Where district heating schemes are proposed, and it is reasonably practical, all properties will be expected to be connected to them.	As detailed in Section 4 and Section 6 of the Planning Statement **[EX4/GH7.15_B]** and by the Design Approach Document **[APP-560]**, the Scheme has been subject to a detailed and sensitive iterative design process, resulting in a high standard of design, as required by this Policy. This has taken account of the context and features of the land within the Order limits, nearby sensitive receptors and assets, information emerging from environmental surveys, feedback from stakeholders, and opportunities and constraints in order to develop a good design that balances the need to maximise the energy generation capacity of the Scheme, with the avoidance and mitigation of impacts, and provision of environmental and other enhancements where practicable. The design process and basis of the design decisions are described in Chapter 5: Alternatives and Design Evolution of the ES **[APP-042]**. As explained by the Design Approach Document **[APP-560]**, the design of the Scheme and its components will be sensitive to its surroundings. Maximum

Table 13: Daventry Local Plan 2011-2029 Part 2 (Adopted 2020) (DLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		height parameters seek to deliver a scheme that integrates with its surroundings, whilst delivering the technical requirements that enable the efficient generation of a large amount of electricity. For example: the maximum heights of solar arrays have been designed to deliver the technical requirements whilst enabling effective screening by hedgerows and BESS units are not proposed to be doubled stacked in order to minimise height. The extent and layout of the Scheme is also sensitive to landscape character and locating the largest structures in the less tranquil and most well screened areas of the Order limits. As explained by the Design Approach Document **[APP-560]**, the design of the Scheme has been sensitive to the visual amenity of residential properties and the setting of heritage assets, incorporating stand-offs between these and PV Arrays where to mitigate potential impacts. The OCEMP **[REP1-131]**, OOEMP **[EX4/GH7.2_B]** and ODS **[REP1-135]** set out measures for the efficient use of

Table 13: Daventry Local Plan 2011-2029 Part 2 (Adopted 2020) (DLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		resources, including, where possible, the reuse and recycling of materials.
ENV10 – Design	A. Development that is of a high quality and, in particular, proposals of an exemplary and innovative design that reflect and integrate with the surrounding area and create a strong sense of place, will be supported. High quality design is achieved by: i. Promoting or reinforcing local distinctiveness and enhancing its surroundings; ii. Taking account of local building traditions and materials; iii. Ensuring that the scale, density, massing, height, layout and access of the proposal combine to ensure development blends well within the site and with its surroundings; iv. Incorporating crime prevention measures in the site layout and building design; v. Integrating existing landscape features of the site with proposed landscaping and open space; vi. Providing details of suitable comprehensive landscaping scheme; vii. Responding to wider landscape context; and viii. Protecting the amenity of new and existing dwellings and not compromise the function of existing surrounding uses.	In addition to meeting the urgent national need for secure and affordable low-carbon energy infrastructure and its associated environmental and societal benefits, the Scheme delivers wider benefits to the environment and the local community. The Scheme is a substantial infrastructure asset, capable of delivering large amounts of secure, affordable low carbon electricity to local and national networks. Design objectives were developed at an early stage and have guided the design response to the local context to develop a good design that balances the need to maximise renewable energy generation from the Scheme, whilst minimising potential adverse impacts and providing mitigation and enhancement measures where practicable, as set out in the Design Approach Document **[APP-560]**. The Scheme delivers good design, being in accordance with the design policies set out in the NPSs in the context of efficiently delivering large scale renewable energy infrastructure where it is recognised in national policy that the

Table 13: Daventry Local Plan 2011-2029 Part 2 (Adopted 2020) (DLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	B. Development of poor design that does not add to the character and quality of an area and the way it functions will not be supported.	extent to which a scheme can contribute to the enhancement of the quality of the area is limited. The Scheme's design does however include embedded additional measures that will deliver biodiversity enhancements; improved connectivity and enhancement of PRoW through the provision of three new permissive paths and proposes a landscape strategy which is sensitive to its surroundings, by reducing the Scheme's impact on the landscape and providing opportunities for screening to protect residential amenities. The location and design of the Scheme accords with the site selection and technical considerations set out in NPS EN-3 for large scale solar development. The Scheme will also deliver a high-quality solar development design that has responded to the local and surrounding context in accordance with relevant local planning policies.
ENV11 – Local Flood Risk Management	A. Proposals for development will be subject to a sequential test and where necessary an exception test in accordance with Policy BN7 of West Northamptonshire Joint Core Strategy and the NPPF. B. In order to manage flood risk and protect and where appropriate improve the quality of the water environment,	A Sequential Test and an Exception Test have been provided as Appendix B of the Planning Statement **[EX4/GH7.15_B]**. The Applicant considers that the Scheme passes the Sequential Test requirements. Given that the Scheme falls within areas

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	development in Daventry District will be expected to comply with: i. The Northamptonshire Local Flood Risk Management Strategy; and ii. The Local Standards and Guidance for Surface Water Drainage in Northamptonshire. iii. Anglian Water's Surface Water Drainage Policy.[55] C. As necessary, development in the District will also need to incorporate the principles set out in the Northamptonshire Flood Guide 23: New Developments and Emergency Flood Plans[56] [55] Anglian Water Surface Water Drainage Policy: https://www.anglianwater.co.uk/developers/development-services/surface-water-policy/ [56] Northamptonshire Flood Guide 23: New Developments and Emergency Flood Plans: https://www.floodtoolkit.com/wp-content/uploads/2017/03/23.Emergency-flood-plans.pdf	of Flood Zone 3, the Scheme has been subject to the Exception Test. It has been concluded that the Scheme meets the requirements of the Exception Test. ES Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]** sets out how flood risk relating to the Scheme is managed and mitigated in conformity with local policies.
CW1 – Health and Wellbeing	A. To promote health and wellbeing and active and healthier lifestyles for all age groups the following will be supported: i. Proposals that demonstrate consideration of all aspects of health and wellbeing issues in their design, layout, landscaping and mix of uses (including co-	With embedded and additional mitigation, the effects on human health and wellbeing are assessed within ES Chapter 18: Human Health **[APP-055]** as being no greater than minor. A number of new permissive paths for pedestrians will be created within or adjacent to Sites Green Hill A, Green Hill

Table 13: Daventry Local Plan 2011-2029 Part 2 (Adopted 2020) (DLP)		
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	location of services) and provide sustainable links to the wider community, jobs, facilities and countryside; ii. The enhancement of existing and provision of new community facilities and open spaces particularly where they would: a. Improve the quantity and quality of accessible open space, sport, recreation and community facilities in the District in line with the standards set out in policy CW2 and the needs identified in the 2018 Open Space Sports and Recreation Study and subsequent updates; and b. Be designed according to Sport England and national governing body guidelines; c. Be accessible by a choice of means of sustainable and active travel; and d. Create traffic free or safe walking and cycling linkages; and e. Result in enhancements and links to the strategic and local green infrastructure network B. The Council will protect existing community facilities and open spaces. Proposals which involve the loss of such facilities and open space will be resisted and will only be allowed if they meet the criteria in Policy RC2 of the WNJCS. C. The Council encourages the submission of a health impact assessment in support of major developments that identifies the health implications, aims to mitigate	A.2, Green Hill D, Green Hill E, Green Hill F and Green Hill G. In addition, a permissive path for horse riders will be created within Green Hill A, and an existing hacking route for horse riders around 6 fields within Green Hill F will be retained and improved. The design and implementation of the permissive paths is set out in the Landscape and Ecology Mitigation Plans **[REP3-042, REP3-044, APP-209, REP3-046, APP-211, REP3-048, REP3-050, APP-214, APP-215, REP3-052, APP-217, REP3-054, APP-219]** and OLEMP **[REP1-137]** and secured by a Requirement in the Draft DCO **[REP3-024]**.

Table 13: Daventry Local Plan 2011-2029 Part 2 (Adopted 2020) (DLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	potential negative effects and maximises the opportunities to promote health and wellbeing and active lifestyles.	

3.5 South Northamptonshire Local Plan Part 2

Table 14: South Northamptonshire Local Plan Part 2 (Adopted 2020) (SNLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Policy SS2: General development and design principles	1. Planning permission will be granted where the proposed development: a. maintains the individual identity of towns and villages and their distinct parts, does not result in physical coalescence that would harm this identity and does not result in the unacceptable loss of undeveloped land, open spaces and locally important views of particular significance to the form and character of a settlement; and b. uses a design-led approach to demonstrate compatibility and integration with its surroundings and the distinctive local character of the area in terms of type, scale, massing, siting, form, design, materials and details; and c. is designed to provide an accessible, safe and inclusive environment which maximises opportunities to increase personal safety and security through preventative or mitigation measures; and	The Scheme has been design-led, with environmental impacts at the forefront of this evolving process that is sensitive to the local environment. With respect to part a) of the policy, the Site is situated in the open countryside. ES Chapter 8: LVIA **[APP-045]** acknowledges that there will be an adverse impact on the landscape during construction and at Year 1 of operation. The Design Approach Document **[APP-560]** sets out how the design has been developed to conserve the existing landscape character as much as possible through identifying key visual receptors and key views and providing mitigation measures to reduce the impact. In addition, the Scheme is not located on any designated open space. Therefore, the

Table 14: South Northamptonshire Local Plan Part 2 (Adopted 2020) (SNLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	d. incorporates suitable landscape treatment as an integral part of the planning of the development; and e. incorporates sensitive lighting schemes that respects the surrounding area and reduce harmful impacts on wildlife and neighbours; and f. will result in a good standard of amenity for its future occupiers in terms of privacy, sunlight, daylight, outlook, natural ventilation, noise, odour and vibration; and will not unacceptably harm the amenity of occupiers and users of neighbouring properties and the area through noise, odour, vibration, overshadowing or result in loss of privacy, sunlight daylight or outlook, unless adequate mitigation measures are proposed and secured; and g. has appropriate regard to its effect on air quality and the effects of air quality on its future occupiers; and h. does not result in the loss of the best and most versatile agricultural land or valued soils; and i. contributes towards the creation of a healthy community and, in the case of major development, demonstrates the health and wellbeing implications of the proposed development through a suitable health impact assessment (HIA). All major developments (10 or more dwellings or 1000 or more square metres) will be expected to complete and submit a rapid HIA in order to determine if more substantial HIA is necessary or not, while larger developments above 100 homes will	Scheme is in accordance with part a) of the policy. In reference to part b) of the policy, the Design Approach Document **[APP-560]** provides further information as to how the Scheme has been designed to consider key considerations, such as heritage, landscape and visual, hydrology, agricultural land assessment, noise and vibration and climate change. The Applicant has identified key design parameters and principles to inform the Scheme which are contained in the Concept Design Parameters and Principles **[REP1-151]**. Therefore, the Scheme is in accordance with part b) of the policy. Regarding part c), an OCEMP **[REP1-131]**, OOEMP**[EX4/GH7.2_B]** and ODS **[REP1-135]** are provided as part of this submission. These documents set out how the Scheme will be accessed safely during all phases of the Scheme and includes mitigation measures to increase safety and security for employees. Therefore, the Scheme is in accordance with part c). Regarding part d), ES Chapter 8: Landscape and Visual Impact **[APP-045]** provides further information as to the green infrastructure that is being provided as part

Table 14: South Northamptonshire Local Plan Part 2 (Adopted 2020) (SNLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	be expected to complete a more substantial HIA to support their application; and j. would include a safe and suitable means of access for all people (including pedestrians, cyclists and those using vehicles); and k. takes into account existing or planned social and transport infrastructure to ensure development is adequately served by public transport or is in reasonable proximity to a range of local facilities which can be reached without the need for private car journeys; and l. is adequately serviced with utility infrastructure appropriate to the development including power, water supply, sewerage, waste management and telecommunications, and provides for satisfactory foul and surface water drainage and incorporates mitigation identified through an assessment of flood risk and the management requirements to address current and future risks incorporating the required climate change allowances; and meets the optional higher water efficiency standard of 110 litres per person per day4 and m. will not adversely affect built heritage and sites of nature conservation value or sites of geological, geomorphological or archaeological importance; and n. is not on or in proximity to land containing known mineral resources, or if known resources exist without	of the Scheme to mitigate any impacts. As well as contributing towards biodiversity net gain, the green infrastructure provision will provide significant moderate beneficial effects to the landscape fabric. Therefore, the Scheme is in accordance with part d). e. Lighting will be controlled during the construction and operational phases and details of how this will be done are contained within the OCEMP **[REP1-131]**, OOEMP **[EX4/GH7.2_B].**With respect to part f), the submission is accompanied by an Environmental Statement **[APP-035-544]**, which considers the impact of the Scheme on the amenity of existing occupiers. With respect to noise and vibration, ES Chapter 14: Noise and Vibration **[APP-051]** confirms that effect on neighbouring sensitive receptors during construction and operation is considered moderate/minor and not significant. In addition, mitigation measures to reduce the impact are set out in the OCEMP **[REP1-131]** and OOEMP **[EX4/GH7.2_B]**. Therefore, the Scheme is in accordance with part f). Regarding part g), ES Chapter 16: Air Quality **[APP-053]** states that the effect of the Scheme on sensitive receptors is not

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	first considering the need to safeguard these resources; and o. would not pose additional risk to users, occupiers and neighbours located in the vicinity of sites that are used for the storage, or processing or transporting of hazardous substances; and p. shows a detailed consideration of ecological impacts, wildlife mitigation and the creation, restoration and enhancement of wildlife corridors to preserve and enhance biodiversity; and q. ensures an appropriate degree of facility provision and waste and recycling storage. Provision should be made for discrete bin storage, ideally within private rear gardens and service yards where it will not result in visual clutter which can substantially detract from the character and perceived quality of the streetscene. 2. Proposals that contravene any of the above criteria (of relevance to that proposal) will be refused unless outweighed by other material considerations. 3. Major development proposals will also be required to: a. retain, enhance or create a high quality public or semi-public realm; and b. enhance legibility through the spatial pattern of development and street hierarchy.	considered significant. Mitigation measures to reduce the impact are set out in the OCEMP **[REP1-131]** and OOEMP **[EX4/GH7.2_B]**. Therefore, the Scheme is in accordance with part g). With respect to part h), ES Chapter 20: Agricultural Circumstances **[APP-057]** acknowledges that 65% of the Scheme is on BMV land. However, the Site Selection Report **[REP1-037]** confirms that there are no alternative sites around the Grendon Substation point of connection, including brownfield land to accommodate the Scheme. ES Chapter 20: Agricultural Circumstances **[APP-057]** states that on decommissioning the agricultural land would be restored to previous conditions after mitigation measures. In fact, there may be an increase in grades for some land, which would result in a beneficial effect, due to the potential increase of topsoil organic matter. It adds that the residual effects on soil structure would be minor adverse, which is not significant. The Outline Soil Management Plan **[APP-550]** provides further information on soil mitigation measures throughout the Scheme. With respect to part i), ES Chapter 18: Human Health **[APP-055]** sets out the

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	4. The use of design codes, masterplans or planning briefs will be considered for multi-phased developments to ensure consistency of design approach.	effects of the Scheme on human health throughout all phases of the Scheme. The effects of the Scheme on human health range from medium term temporary minor adverse effects (e.g. open space and PRoWs) to temporary beneficial effects (e.g. education and training). The Scheme is accompanied by OCEMP **[REP1-131]**, OOEMP **[EX4/GH7.2_B]** and ODS **[REP1-135]**, which provide mitigation measures to reduce the effect of the Scheme. Therefore, the Scheme is in accordance with part i). With respect to part j), the Scheme is supported by an OCEMP **[REP1-131]**, OOEMP **[EX4/GH7.2_B]** and ODS **[REP1-135]**, which provide details on how the Scheme will be accessed safely by all users throughout all phases of the Scheme. Therefore, the Scheme is in accordance with part j). Regarding part k), the transportation of construction workers for the Scheme is considered in Chapter 13 Transport and Access **[REP2-003]** of the ES, which states that on average, it has been assumed that a shuttle bus will be able to accommodate 15 workers. As such, a spread of between 40% and 60% of construction workers across the Scheme Sites is expected to arrive by

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		shuttle bus. This is a similar range to other DCO Solar Scheme consents. For example, Longfield Solar Farm (PINS reference EN010118) assumed that 55% of the workforce would arrive by shuttle bus and Cottam Solar Project (PINS reference EN010133) assumed 50%. The OCEMP **[REP1-131]** encourages the use of lower carbon modes of transport by identifying and communicating local bus connections and pedestrian and cycle access routes to/ from the Scheme to all construction staff and providing appropriate facilities for the safe storage of cycles. A Travel Plan is also proposed to reduce volume of staff and employee trips to the sites. The final measures and details will be confirmed in the CEMP. Regarding part l) ES Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]** sets out how flood risk relating to the Scheme has been assessed and will be managed. In addition, the OCEMP **[REP1-131]**, OOEMP **[EX4/GH7.2_B]** and ODS **[REP1-135]** provide further details on how waste will be minimised throughout all phases of the Scheme. ES Chapter 7: Climate Change **[APP-044]** provides a summary as how the Scheme will provide significant carbon

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		benefits over its lifetime compared with fossil fuel energy generation. Therefore, the Scheme is in accordance with part l). With respect to part m), ES Chapter 12: Cultural Heritage **[APP-049]** confirms that there are no designated or non-designated assets within the Order Limits. Mitigation measures have been considered as part of the design to mitigate the impacts on the setting of assets. These measures include hedgerow enhancements screening heritage assets from the Scheme. An Archaeological Mitigation Strategy **[EX4/GH6.3.12.6_A]** details the mitigation measures to safeguard or record archaeological sites that could be impacted by the Scheme. The OCEMP **[REP1-131]** and OOEMP **[EX4/GH7.2_B]** confirm that any identified impacts to heritage or archaeological assets will be safeguarded during the construction and operational phases of the Scheme. Therefore, the Scheme is in accordance with part m). Regarding part n), ES Chapter 11: Minerals **[APP-048]** confirms that some sites within the Scheme and the BESS are located within mineral safeguarding areas. However, it adds that the Scheme is anticipated to be decommissioned after 60

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		years and any impacts caused by the Scheme related to land use are therefore, reversible and temporary. After decommissioning, the Scheme could be worked for minerals. Therefore, the Scheme is in accordance with part n). Regarding part o), ES Chapter 23: Major Accidents and Disasters **[APP-060]** acknowledges that there may be an increase in the risk of leak and spillages of hazardous materials during the construction and operation of the Scheme. Although the effects are not considered to be significant, the OCEMP **[REP1-131]** and OOEMP [**EX4/GH7.2_B**] provide mitigation measures in the Scheme to reduce the effect. In addition, ES Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]** further considers these potential environmental impacts. Therefore, the Scheme is in compliance with part o). Regarding part p), ES Chapter 9: Ecology and Biodiversity **[REP1-033]** considers the impact of the Scheme on ecological assets. The Site Selection Report **[REP1-037]** confirms that the Applicant did not seek to use land for the Scheme which was located within highly sensitive ecological/biodiversity related designations. The Applicant has

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		proposed suitable protection, mitigation and, where possible, enhancement of ecological designations that are located in proximity to the Scheme. The Scheme is also providing significant biodiversity net gain, as detailed in the Biodiversity Net Gain Assessment **[REP1-043]**. The management and maintenance of the proposed green infrastructure to support the development is secured in the OLEMP **[REP1-137]**. Therefore, the Scheme is in accordance with part p). Regarding part q), the OCEMP **[REP1-131]** and ODS **[REP1-135]** are to be secured through a DCO requirement and a commitment is included to prepare and approve a Construction Resource Management Plan and a Decommissioning Resource Management Plan to ensure that the construction and decommissioning of waste is minimised as well as providing details on removal. Therefore, the Scheme is in accordance with part q). The Applicant has identified key design parameters and principles to inform the Scheme, which are contained in the Concept Design Parameters and Principles **[REP1-151]**, which ensures consistency of design approach and provides parameters

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		for the ES **[APP-037-544]** to be assessed against. Therefore, the Scheme is in accordance with part 4 of the Policy.
Policy EMP1: Supporting skills	1. To support the retention of skilled resident workforce proposals for major new industrial and commercial development will be required to contribute to increasing or maintaining a skilled workforce. 2. Applicants should reach an agreement with the Council on appropriate and proportional measures to achieve this through an appropriate skills agreement which will be secured through a legal agreement.	The Scheme will have a positive impact on employment in the renewable energy sector. This includes the following: • Employment during the construction phase. It is expected that 464 direct FTE jobs will be created during the construction period. During the operational phase, a gross 15 FTE staff would be employed for operation and maintenance of the site. • Diversification of local employment from a predominantly agricultural and tourism base. Chapter 17: Socio-Economics, Tourism and Recreation of the ES **[APP-054]** includes an assessment of socio-economic impacts of the Scheme, including employment. The submission is accompanied by an OSSCEP **[APP-552]**. This sets out how the Applicant will commit to promoting competition, innovation and skills within the communities surrounding the Scheme and across the wider local authority areas of North Northamptonshire Council, West

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		Northamptonshire Council, Milton Keynes City Council and Bedford Borough Council.
Policy HE1: Significance of heritage assets	When considering proposals that affect both designated and non-designated heritage assets and their settings including those identified on local lists, the significance of those assets should first be established by the applicant through a proportionate but thorough and systematic heritage assessment. Such an assessment should be sufficient so as to understand the potential impact of the proposal on the significance of the asset.	Chapter 12: Cultural Heritage of the ES **[APP-049]** provides a comprehensive assessment of the likely effects of the Scheme on heritage assets above and below ground. This includes a description of the significance of the heritage assets and the contribution of their setting to their significance, and potential mitigation measures to minimise any impact.
Policy HE2: Scheduled ancient monuments and archaeology	1. Development that would harm nationally important Scheduled Ancient Monuments or archaeological remains or their settings, whether scheduled or not will not be permitted except in wholly exceptional circumstances where a clear and convincing justification can be demonstrated. 2. Development that would harm locally important archaeological remains or their settings will only be permitted where the public benefits of that development are significant and can be demonstrated to outweigh the harm to the archaeological interest of the asset and its setting 3. There is a presumption in favour of preservation in situ in the case of both nationally and locally important remains. Preservation of important remains by record will only be supported where the public benefits derived	There are no Scheduled Monuments located within the Order Limits. ES Chapter 12 Cultural Heritage **[APP-049]** states that long distance views from the Scheme to the Church of St Mary the Virgin do not contribute to the asset's significance and as such no significant effects were identified as a result of the Scheme. The residential scheme is largely screened from the church by buildings to the south of Mears Ashby Road in Wilby and woodland to the north of the road. Consequently, no cumulative effects are identified. ES Chapter 12 Cultural Heritage **[APP-049]** also indicate that there would be no significant effects in EIA terms to archaeological assets during the operational

Table 14: South Northamptonshire Local Plan Part 2 (Adopted 2020) (SNLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	from a development can be demonstrated to outweigh the ability to preserve those remains in situ. 4. When considering proposals that may affect sites that potentially have remains of archaeological importance, they will not be assessed until an appropriate desk based assessment and where necessary, a field assessment has been undertaken. 5. Where archaeological sites are known or found to exist within a development site the design of the development should seek to preserve the site in the overall scheme in order to allow the preservation in situ.	phase, with effects mostly ranging between Neutral and Slight Beneficial.
Policy HE5: Listed buildings	1. Proposals to alter or extend a listed building including its change of use or development within its setting will be permitted where they: a. contribute to the preservation of the building and are not detrimental to its special architectural or historic interest or any features that contribute towards it; and b. are of an appropriate scale, form, massing and design and use appropriate materials and methods of construction which are compatible with the character and construction of the building; and c. have regard to the historic layout of the building and other internal features of significance; and d. preserve the setting being mindful that the setting may extend beyond the immediate curtilage of the building.	ES Chapter 12 Cultural Heritage **[APP-049]** confirms that there are no listed buildings within the Order limits. A total of 420 413 Listed Buildings of varying grade were identified within the Study Area, of which 691 Listed Buildings were identified where there is a potential for impacts. Appendix 12.9 of ES Chapter 12 Cultural Heritage **[APP-049]** indicates that most of the identified impacts on heritage assets would be not significant in EIA terms with effects mostly ranging between Neutral and Minor/Moderate Adverse.

Table 14: South Northamptonshire Local Plan Part 2 (Adopted 2020) (SNLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Policy HE6: Conservation areas	1. Within a conservation area proposals for development including alteration, extensions and change of use or the display of advertisements will normally be permitted where they: a. respect the character and appearance of the area in terms of, scale, form, massing, design, materials and detailing; and b. preserve or enhance the significance of the asset; and c. in the case of an intensification of use or a change of use the proposal will be in scale with and not harm the established character of the area. 2. The council will seek to preserve or enhance the special character and appearance of its conservation areas by resisting the loss of attractive buildings, walls, trees, hedges, open spaces and other features of importance to the significance of the area. 3. Where harm would be caused, including through development proposals outside of a conservation area which have an adverse effect on the setting of the conservation area or any views into or out of the area such harm will need to be weighed against the public benefits of the proposals.	ES Chapter 12 Cultural Heritage **[APP-049]** confirms there are no Conservation Areas within the Order Limits and that a total of 37 Conservation Areas were identified within the Study Area. Of these, four Conservation Areas were identified where there is a potential for impacts these being: - Castle Ashby Conservation Area; - Easton Maudit Conservation Area - Grendon Conservation Area; and - Mears Ashby Conservation Area Of these, there are two Conservation Areas (Mears Ashby and Easton Maudit) where a significant residual effect of **Moderate Adverse** rating has been identified at the construction and operational phases. However, following the implementation of the additional mitigation outlined in Section 12.9 of Chapter 12 Cultural Heritage **[APP-049] the** residual effect would be reduced to Negligible Adverse, which is not significant. The decommissioning impacts would be temporary, short term and reversible in nature, and would ultimately result in the reversal of the operational phase impacts leading to Neutral effects at the end of the decommissioning phase.

Table 14: South Northamptonshire Local Plan Part 2 (Adopted 2020) (SNLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		ES Chapter 12 Cultural Heritage **[APP-049]** concludes that the impact on the heritage significance of the Conservation Area will not be significant during the construction and operational stages of the Scheme subject to the implementation of the embedded mitigation measures identified and in the OCEMP **[REP1-131],** OOEMP **[EX4/GH7.2_B]** and ODS **[REP1-135]** Therefore, the urgent need for this Scheme and compliance with policy, as set out in Chapter 6 Energy Need Legislative Context and Energy Policy **[APP-043]** including embedded mitigation measures would weigh the public benefits in favour of the Scheme when assessed against the identified harms.
Policy HE7: Non-designated heritage assets	1. Alterations, additions and changes of use should respect the character appearance and setting of the asset in terms of design, materials, form, scale and massing. 2. Proposals involving the full or partial loss of a non-designated asset should balance the scale of any harm or loss that is caused and the significance of the heritage asset against any benefits. Where loss is permitted a full recording of the asset is likely to be requested.	ES Chapter 12 Cultural Heritage **[APP-049]** confirms there are no non-designated heritage assets within the Order Limits and that no likely significant effects have been identified on any RPGs, Scheduled Monuments or non-designated heritage assets located beyond the Order Limits

Table 14: South Northamptonshire Local Plan Part 2 (Adopted 2020) (SNLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Policy NE1: Upper Nene Gravel Pits Special Protection Area	1. In order to protect sightlines for birds included within the Upper Nene Gravel Pits Special Protection Area, new development within a 3km zone of the Special Protection Area shown on the proposals map must undertake an assessment to demonstrate that it will not have a significant adverse effect on birds within the area or, if directly adjacent to existing buildings, should reflect surrounding building heights. 2. New development will need to demonstrate through the development management process that there will be no significant adverse effects upon the integrity of the Special Protection Area and the species for which the land is designated including the loss of supporting habitat and impacts due to water runoff, water abstraction or discharges from the foul drainage system either as a direct result of the development alone or in combination. 3. New development will need to demonstrate that the impact of any increased recreational activity (indirect or direct) on the Special Protection Area will not have a detrimental impact. Any development that will lead to an increase in recreational activity on the Special Protection Area will be required to include necessary mitigation including providing or contributing towards a combination of the following measures: a. development of and implementation of habitat and access management plans within the SPA; and	No development is proposed on the Upper Nene Valley Pits Special Protection Area. The BESS adjacent to the Grendon National Grid Station is in proximity to the Upper Nene Valley Pits Special Protection Area. Chapter 9: Ecology and Biodiversity of the ES **[REP1-033]** has assessed the impact on the Scheme on the Upper Nene Valley Special Protection Area which is an International designation or International Importance. It states that the Upper Nene Valley GP SPA/SSSI lies within 10km of Green Hill B, C, D, E, BESS, F and G. In terms of the significance effects, the embedded mitigation measures will minimise any potential impacts from pollution on the SPA during the construction phase, it is considered that all reasonable steps will be taken to ensure that **no significant adverse effects** will occur via this pathway during the construction phase. Temporary disturbance during construction to mobile SPA species is considered to lead to **no significant adverse effects.** Furthermore, embedded mitigation measures will minimise the risk of any potential impacts from pollution on the SPA during the

Table 14: South Northamptonshire Local Plan Part 2 (Adopted 2020) (SNLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	b. improvement of existing greenspace and recreational routes; and c. provision of alternative natural greenspace and recreational routes; and d. monitoring of the impacts of new development on European designated sites to inform the necessary mitigation requirements and future refinement of any mitigation measures. 4. The Local Planning Authority or successor authority will prepare a Mitigation Strategy document concerning the Upper Nene Valley Gravel Pits Special Protection Area with a view to its subsequent adoption as an Addendum to the Upper Nene Valley Gravel Pits Special Protection Area Supplementary Planning Document within 12 months of the adoption of the Part 2 Plan.	operational phase, it is considered that **no significant adverse effects** will occur**.**
Policy NE2: Special Landscape Areas	1. Within Special Landscape Areas development related to unallocated site and sites outside of settlement confines should avoid harmful impacts to the character and appearance of the area. 2. Proposals for development within a Special Landscape Area should: a. pay particular regards to design, materials, siting of buildings and the use of land; and b. make best use of the land available; and	Part of the cable route and the construction compound are situated within the Castle Ashby and Yardley Chase Special Landscape Area. However, the construction compound proposed is temporary and the cable route will be underground, so any impact is expected to be temporary. Although ES Chapter 8: Landscape and Visual **[APP-045]** acknowledges that there will be an adverse effect on the landscape, there is a need to create and secure and

Table 14: South Northamptonshire Local Plan Part 2 (Adopted 2020) (SNLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	c. be informed by, the qualities of the special landscape area as set out in South Northamptonshire: A Review of Special Landscape Areas 2017 or any successor document(s); and d. contribute, where appropriate, to the conservation, restoration or enhancement, or restoration of the area's character and appearance. 3. Dependent on scale and context development proposals within the SLA may require a full landscape and visual impact assessment (LVIA) where required, the LVIA should inform the design of the proposal to minimise negative landscape impacts including the incorporation of mitigation and compensatory measures.	affordable energy system to help combat climate change. In addition, Chapter 8: Landscape and Visual **[APP-045]** confirms that there will be a significant moderate benefit on the landscape fabric at Year 15 of operation and on decommissioning of the Scheme, due to the implementation of mitigation planting, which will be maintained. Therefore, the Scheme is in accordance with this policy.
Policy NE4: Trees, Woodlands And Hedgerows	1. Proposals for development should seek to integrate existing trees, woodland and hedgerows. 2. Development that results in the loss of ancient woodland or aged and veteran trees or other protected trees will rarely be acceptable. Proposals that would result in the loss or deterioration of these specimens will be refused unless the need for, and benefit of the development in that location clearly and demonstrably outweighs the loss. 3. Proposals for felling or pruning will not be permitted to a tree in a conservation area or to a tree subject to a tree preservation order except where the proposal is	The Scheme is not proposing to remove any ancient woodland or veteran trees. ES Chapter 19: Arboriculture **[APP-056]** confirms that negligible and non-significant impacts are anticipated for ancient and veteran trees and ancient woodlands at the Sites with the additional mitigation measures implemented, due to their proximity. The additional mitigation measures are set out in the Preliminary Arboricultural Assessment and Outline Arboricultural Method Statement **[APP-171]**. Canopy pruning to a veteran tree may be required to accommodate visibility splays

Table 14: South Northamptonshire Local Plan Part 2 (Adopted 2020) (SNLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	justified in the interests of good arboricultural practice or other clear environmental benefits. 4. Where the loss of existing trees, woodland or hedgerows is unavoidable, suitable replacement planting will be required within the development site or secured via planning obligation to be provided at another location with direct links to the development site. 5. Planting schemes should, where possible, use native or similar species and varieties, and maximise the benefits to the local landscape and wildlife.	adjacent to a temporary access point, but it will not be removed. In addition, the Cable Route Corridor has been designed to avoid the removal of high quality trees as far as possible and any mitigation will be implemented during construction to minimise any impact through methods such as hand-digging and root pruning, set out in the Preliminary Arboricultural Assessment and Outline Arboricultural Method Statement **[APP-171]**. Therefore, the Scheme accords with this policy.
Policy NE5: Biodiversity and Geodiversity	1. Development proposals should aim to conserve and enhance biodiversity and geodiversity in order to provide measurable net gains. 2. Development proposals will be expected to mitigate harm and incorporate measures to enhance biodiversity within or around a development site, and to contribute to the consolidation and development of local ecological networks, including beyond the district's boundary. Measures should be appropriate and compatible with existing biodiversity, ecosystems and designated wildlife sites. 3. The council will seek to ensure new development maintains, enhances, and helps to create or extend networks of natural habitats. Proposals for improved access, recreation and tourism within such networks	Assessment of Ecological impacts is set out in ES Chapter 9: Ecology and Biodiversity **[REP1-033]**. It confirms that no significant effect will occur on designated receptor sites in terms of ecology. A Biodiversity Net Gain (BNG) Assessment, using Defra's Metric 4.0 has been provided within the DCO application **[REP1-043]**. This sets out the significant net gains in biodiversity that the Scheme will provide. The Scheme has taken advantage of opportunities to conserve and enhance biodiversity and accords with this policy.

Table 14: South Northamptonshire Local Plan Part 2 (Adopted 2020) (SNLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	will be supported where they are compatible with biodiversity aims. 4. Development proposals will not be permitted where they would result in significant harm to biodiversity or geodiversity, including protected species and sites of international, national and local significance, ancient woodland, and species and habitats of principal importance identified in the United Kingdom Post-2010 Biodiversity Framework.	The Scheme has therefore incorporated improvements in biodiversity and accords with this policy. See also Section 6.9 of the Planning Statement **[EX4/GH7.15_B]** for further detail on the biodiversity measures incorporated and compliance with planning policy.
Policy NE6: Sites of Special Scientific Interest and Protected Species	1. Development proposals that are likely to have a significant adverse effect on the integrity of a Site of Special Scientific Interest will only be permitted where: a. there are no suitable and available sites of lesser ecological value; and b. the proposal is justified by reason of overriding public interest where the public benefits clearly outweigh the impacts that the development it is likely to have on: i. The features of the site that make it of special scientific interest; and ii. Any broader impacts on the national network of sites of special scientific interest. 2. Development proposals where there is a reasonable likelihood of the presence of protected or priority species of their habitats will not be permitted until it has been demonstrated that the proposed development will	Assessment of Ecological impacts on the identified SSSIs are set out in ES Chapter 9: Ecology and Biodiversity **[REP1-033]**. Table 9.7 (construction phase) and 9.8 (operational phase) contain a summary of the environmental effects in terms of the potential impacts and the effects of the embedded mitigation measures and any residual effects. For the identified SSSI (Upper Nene Valley Gravel Pits). For construction phase the significance of effects and residual effects is identified as Neutral, not significant with the embedded and additional mitigation. The Scheme is therefore considered to be compliant with this policy.

Table 14: South Northamptonshire Local Plan Part 2 (Adopted 2020) (SNLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	not result in a negative impact on these species or their habitats.	
Policy NE7: Development in the Nature Improvement Area	Development within the Nene Valley Nature Improvement Area will be permitted where it: a. enables the functioning of the Nature Improvement Area; and b. where appropriate, contributes to the opportunities for habitat creation and/or habitat management within the Nature Improvement Area; and c. is consistent with other policies in the development plan.	Assessment of Ecological impacts is set out in ES Chapter 9: Ecology and Biodiversity **[REP1-033]**. Section 6.7 of the Planning Statement **[EX4/GH7.15_B]** concludes that with the embedded mitigation measures proposed which are wide-ranging and respond directly to the type of species and habitats that are affected, the Scheme is expected to have an overall significant benefit. A Biodiversity Net Gain (BNG) Assessment, using Defra's Metric 4.0 has been provided within the DCO application **[REP1-043]**.

3.6 Northamptonshire Minerals and Waste Local Plan

Table 15: Northamptonshire Minerals and Waste Local Plan (Adopted 2017) (NMWLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Policy 4 – Policy 4: Sites for the provision of sand and gravel	A supply of sand and gravel to contribute to meeting the provision of sand and gravel will be provided for by: production since 1 January 2011, sites with planning permission as at 1 January 2016 and the following allocated sites.	ES Chapter 11: Minerals **[APP-048]** identifies that the Scheme potentially impacts a sand and gravel allocation known as M2: Strixton - Bozeat 1.5 million tonnes (approximately) as well as two existing quarry areas and the mineral consultation areas (MSCs) associated with existing quarries and allocations.

Table 15: Northamptonshire Minerals and Waste Local Plan (Adopted 2017) (NMWLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	Pre-glacial and glacial areas M1: Milton Malsor 1.2 million tonnes (approximately) M2: Strixton - Bozeat 1.5 million tonnes (approximately) Central Nene Valley M3: Heyford 1.4 million tonnes (approximately) M4: Earls Barton West Extension 2.6 million tonnes (approximately) Great Ouse Valley M5: Passenham Extension South 0.2 million tonnes (approximately) Other locations M6: Elton Extension 0.85 million tonnes (approximately)	ES Chapter 11: Minerals **[APP-048]** confirms Site F has the potential to affect future mineral supply by directly abutting the allocation Site M2. On this basis, the Scheme has been designed to retain at least a 30 metre separation between the allocation boundary and the nearest solar panel. The Statement of Need **[APP-556]** sets out a detailed case as to why the Scheme is urgently required, concluded that it will be a critical part of the UK's portfolio of renewable energy. As the Scheme is proposed to be decommissioned after 60 years, any impacts are considered to be reversible and temporary. Therefore, post decommissioning, the land can be worked for minerals. Therefore, the Scheme is compliant with this Policy.
Policy 26 – Sustainable design and use of resources	New built development should seek to utilise the efficient use of resources in both its construction and its operation through: - Design principles and construction methods that minimise the use of primary aggregates and encourage the use of building materials made from secondary and recycled sources,	The integration of sustainable design into the design process is described in ES Chapter 5: Alternatives and Design Evolution **[APP-042]** and the Design Approach Document **[APP-560]**. Regarding the first bullet point, ES Chapter 7: Climate Change **[APP-044]** sets out specific mitigation measures in the OCEMP **[REP1-131]** to reduce the carbon emissions of the Scheme.

Table 15: Northamptonshire Minerals and Waste Local Plan (Adopted 2017) (NMWLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	- Construction and demolition methods that minimise waste production, and re-use and recycle materials (as far as practicable) on-site, - The use of non-primary mineral construction materials, except where there is a need to protect and conserve the existing character of the area, which require traditional building materials (such as building and roofing stone), - Design and layout that allows the sorting, recycling, biological processing and storage of waste, and - Supporting the move to a low carbon economy by way of reduced greenhouse gas production through design and layout that incorporates energy and water efficiency, and where appropriate flood mitigation or attenuation measures.	These specific measures including increasing recyclability by segregating construction waste to be re-used and recycled where possible and using alternative materials which are more locally sourced and have lower embodied carbon. With respect to the second bullet point, in accordance with the waste hierarchy, ES Chapter 24: Other Environmental Matters **[APP-061]** confirms that the Scheme will follow the waste hierarchy. The OCEMP **[REP1-131], OOEMP [EX4/GH7.2_B]** and DS **[REP1-135]** provide further details on how waste will be minimised throughout all phases of the Scheme. Regarding the third bullet point, the materials of the Scheme are specific to the type of Scheme proposed (i.e. solar panels). With respect to the fourth bullet point, the design and layout of the Scheme has been optimised to benefit from the most optimal siting of the solar panels. In addition, during the operational phase of the Scheme, the Scheme will adhere to the waste hierarchy, which is confirmed in the waste section of ES Chapter 24: Other Environmental Matters **[APP-061]**. Regarding the fifth bullet point, ES Chapter 7: Climate Change **[APP-044]** provides a summary as to how the Scheme seeks to

Table 15: Northamptonshire Minerals and Waste Local Plan (Adopted 2017) (NMWLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		reduce carbon emissions throughout its lifetime. It concludes that up to 186,306tCO_2e will be saved over the operational lifetime of the Scheme in comparison to the same electricity generated by a combined-cycle gas turbine. In addition, ES Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]** confirms that the Scheme has mitigated potential impacts on flooding and avoids increasing the risk of flooding elsewhere. The ES Flood Risk Assessment and Drainage Report **[APP-098 to APP-107, REP1-053, REP1-055]** provides further information as to drainage strategy for all the sites, the BESS and the cable route corridor, Therefore, the Scheme is compliant with this policy.
Policy 28: Minerals Safeguarding Areas	Mineral resources of economic importance will be safeguarded from sterilisation by incompatible non-mineral development through the designation of Minerals Safeguarding Areas. Development of a significant nature within Minerals Safeguarding Areas will have to demonstrate that the sterilisation of proven mineral resources of economic importance will not occur as a result of the development, and that the development would not pose a serious hindrance to future extraction in the	The Scheme is situated within the Sand and Gravel Minerals Safeguarding Area. Minerals Safeguarding has been considered within ES Chapter 11: Minerals **[APP-048]**. Within this Chapter, mineral safeguarding has been considered with mitigation measures being concluded. While major or moderate effects are identified with regard to safeguarded and permitted sand and gravel resources within the Cable Route Corridor between Green Hill E and Green Hill

Table 15: Northamptonshire Minerals and Waste Local Plan (Adopted 2017) (NMWLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	vicinity. If this cannot be demonstrated, prior extraction will be sought where practicable. Development of a non-mineral related nature within the Mineral Safeguarding Areas which is incompatible with the safeguarding of minerals should not proceed unless: - it can be clearly demonstrated to the satisfaction of the Mineral Planning Authority that the mineral concerned is no longer of any value, or potential value, or that substantial (economically viable) deposits of a similar quality exist elsewhere in the county, or - the mineral can be extracted, where practicable, prior to the development taking place, or - the incompatible development is of a temporary nature and can be completed with the site restored to a condition that does not inhibit extraction within the timescale that the mineral is likely to be needed, or - the development is of a minor nature which would not inhibit extraction of the mineral resource, or	BESS, these reduce to minor effects with additional mitigation. The Statement of Need **[APP-556]** sets out a detailed case as to why the Scheme is urgently required, concluded that it will be a critical part of the UK's portfolio of renewable energy. As the Scheme is proposed to be decommissioned after the operational phase of up to 60 years, any impacts are considered to be reversible and temporary. Therefore, post decommissioning, the land can be worked for minerals. Therefore, the Scheme is compliant with this Policy.

Table 15: Northamptonshire Minerals and Waste Local Plan (Adopted 2017) (NMWLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	- there is an overriding need for the development.	
Policy 30: Preventing land use conflict	Proposals for new development adjacent or in close proximity to committed or allocated minerals or waste related development (including associated rail head / links, wharfage, minerals storage / processing facilities and sewage treatment works) should only be permitted where it can be demonstrated that it would not adversely affect the continued operation of the facility or prevent or prejudice the use of the site. Proposals for development considered to be incompatible with committed or allocated minerals or waste development will be required to undertake an assessment of potentially adverse impacts identifying practical measures, including the use of separation areas, for preventing the occurrence (either now or in the future) of land use conflict and potential adverse environmental effects resultant from ongoing occupation and usage (of the proposed development) this may include an assessment of potential impacts including bioaerosols, odour, noise, dust, etc. The following should be taken into consideration in proposals for incompatible development in determining adequate separation areas:	The proposed Cable Route for the Scheme crosses the Earls Barton Northamptonshire Minerals Commitments 2023. ES Chapter 11: Minerals **[APP-048]** considers the impact of the Scheme on these minerals commitments. The Statement of Need **[APP-556]** sets out a detailed case as to why the Scheme is urgently required, concluded that it will be a critical part of the UK's portfolio of renewable energy. As the Scheme is proposed to be decommissioned after 60 years, any impacts are considered to be reversible and temporary. Therefore, post decommissioning, the land can be worked for minerals. Therefore, the Scheme is compliant with this Policy.

Table 15: Northamptonshire Minerals and Waste Local Plan (Adopted 2017) (NMWLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	- nature of both the minerals and / or waste development (committed or allocated) and proposed development (including duration), - compatibility of the proposed activity with the minerals and / or waste development (committed or allocated), - characteristics of any potential adverse environmental effects likely to arise as a result of land use conflict, and - any additional measures considered necessary to mitigate potentially adverse impacts	

3.7 Milton Keynes Plan:MK

Table 16: Milton Keynes Plan:MK 2016 to 2031 (Adopted 2019) (MKLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Policy DS3 (Employment Development Strategy)	Over the plan period, the Council will seek to grow and development the Milton Keynes local economy. The Council will: 1. Encourage training and skills development at all levels to enable residents to access	The Scheme will have a positive impact on employment in the renewable energy sector. This includes the following: • Employment during the construction phase. It is expected that 464 direct FTE jobs will be created during the construction period. During the operational phase, a gross 15

Table 16: Milton Keynes Plan:MK 2016 to 2031 (Adopted 2019) (MKLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	the job opportunities generated by employers. 2. Attract new businesses, encourage business start-ups and assist businesses to grow.	FTE staff would be employed for operation and maintenance of the site. • Diversification of local employment from a predominantly agricultural and tourism base. Chapter 17: Socio-Economics, Tourism and Recreation of the ES **[APP-054]** includes an assessment of socio-economic impacts of the Scheme, including employment. An OSSCEP **[APP-552]** has been submitted. This provides further information on how the Applicant will commit to promoting competition, innovation and skills within the communities surrounding the Scheme and across the wider local authority areas, including Milton Keynes, in accordance with part 1 of the Scheme. Therefore, the Scheme is in accordance with this policy.
Policy DS5 (Open Countryside)	A. The Council defines Open Countryside as all land outside the development boundaries defined on the Policies Map. Planning permission within the open countryside will only be granted for development, which is essential for agriculture, forestry, countryside recreation, highway infrastructure or other development, which is wholly appropriate to a rural area and cannot be located within a settlement, or where other	Due to the scale of land required to deliver the substantial renewable energy generation capacity that the Scheme will provide, and the need to be in sufficient proximity of the connection point to the National Electricity Transmission System (NETS), the Scheme could not be located within an urban area or settlement boundary as explained within the Site Selection Assessment **[REP1-037]**.

Table 16: Milton Keynes Plan:MK 2016 to 2031 (Adopted 2019) (MKLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	policies within this plan indicate development would be appropriate.	As explained in the Statement of Need **[APP-556]** and summarised in Sections 4 and 6 of the Planning Statement **[EX4/GH7.15_B]**, the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon energy to help meet the UK's urgent need to decarbonise with solar technology, supported by government policy. As well as more recently to provide security of supply as well as affordability for end consumers. Please also refer to the compliance of the Scheme with other policies within the Plan.
Policy ER8 (Employment Uses and the Rural Economy)	A. Proposals which sustain and enhance the rural economy by creating or safeguarding jobs and businesses will be supported where they are of an appropriate scale for their location and respect the environmental quality and character of the open countryside. B. The following types of development are considered to be acceptable: 1. The re-use of farm buildings. 2. Schemes for farm diversification involving small-scale business and commercial development. 3. Small-scale tourism proposals including visitor accommodation.	Regarding part A. of the policy, the Scheme will have a positive impact on employment in the renewable energy sector. This includes the following: • Employment during the construction phase. It is expected that 464 direct FTE jobs will be created during the construction period. During the operational phase, a gross 15 FTE staff would be employed for operation and maintenance of the site. • Diversification of local employment from a predominantly agricultural and tourism base. Chapter 17: SETR of the ES **[APP-054]** includes an assessment of socio-economic impacts of the Scheme, including employment.

Table 16: Milton Keynes Plan:MK 2016 to 2031 (Adopted 2019) (MKLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	4. Proposals that recognise the economic benefits of the natural and historic environment as an asset to be valued, conserved and enhanced. 5. The expansion of small-scale businesses in their existing locations depending on the nature of the activities involved, the character of the site and its accessibility. 6. The use of land for agriculture, forestry, fisheries and equestrian activity. 7. Small scale employment development to meet local needs.	An OSSCEP **[APP-552]** has been submitted. This provides further information on how the Applicant will commit to promoting competition, innovation and skills within the communities surrounding the Scheme and across the wider local authority areas, including Milton Keynes, in accordance with part A of the Scheme. Regarding part B of the policy, it is acknowledged that the Scheme does not meet the acceptable uses detailed below. However, due to the scale of land required to deliver the substantial renewable energy generation capacity that the Scheme will provide, and the need to be in sufficient proximity of the connection point to the National Electricity Transmission System (NETS), the Scheme could not be located within an urban area or settlement boundary as explained within the Site Selection Assessment **[REP1-037]**. As explained in the Statement of Need **[APP-556]** and summarised in Sections 4 and 6 of the Planning Statement **[EX4/GH7.15_B]**, the Scheme is a substantial infrastructure asset, capable of delivering large amounts of low-carbon energy to help meet the UK's urgent need to decarbonise with solar technology, supported by government policy. As well as more recently to provide security of supply as well as affordability for end consumers.

Table 16: Milton Keynes Plan:MK 2016 to 2031 (Adopted 2019) (MKLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Policy CT1 (Sustainable Transport Network)	A. The Council will promote a sustainable pattern of development in Milton Keynes, minimising the need to travel and reducing dependence on the private car. Milton Keynes will: 1. Promote a safe, efficient and convenient transport system. 2. Promote transport choice, through improvements to public transport services and supporting infrastructure, and providing coherent and direct cycling and walking networks to provide a genuine alternative to the car. 3. Promote improved access to key locations and services by all modes of transport and ensure good integration between transport modes. 4. Manage congestion and provide for consistent journey times. 5. Promote and improve safety, security and healthy lifestyles. 6. Continue to engage with relevant stakeholders along the East-West Rail line and Expressway to identify operational benefits, which provide additional support for a more	This response considers the relevant parts of the policy which relate to the Scheme. Regarding part A of the policy, the Scheme has been designed to minimise the impact on the surrounding road network. Chapter 13: Transport and Access **[REP2-003]** includes measures to mitigation promote highway safety during the construction and operational phases of the Scheme through site management. The details of these are contained in the OCEMP **[REP1-131]** and OOEMP **[EX4/GH7.2_B]**. Regarding A.2 of the policy, the transport of construction workers for the Scheme is considered in Chapter 13 Transport and Access **[REP2-003]** of the ES, which states that on average, it has been assumed that a shuttle bus will be able to accommodate 15 workers. As such, a spread of between 40% and 60% of construction workers across the Scheme Sites is expected to arrive by shuttle bus. This is a similar range to other DCO Solar Scheme consents. For example, Longfield Solar Farm (PINS reference EN010118) assumed that 55% of the workforce would arrive by shuttle bus and Cottam Solar Project (PINS reference EN010133) assumed 50%. In addition, the OCEMP **[REP1-131]** encourages the use of lower carbon modes of transport by identifying and communicating local

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	sustainable transport strategy and/or economic growth of the city. 7. Engage with the National Infrastructure Commission to set in place connections from Central Milton Keynes to surrounding communities, including a fifth track constructed between Bletchley and Milton Keynes Central. 8. Promote the usage of shared transport schemes in the borough.	bus connections and pedestrian and cycle access routes to/ from the Scheme to all construction staff and providing appropriate facilities for the safe storage of cycles. A Travel Plan is also proposed to reduce volume of staff and employee trips to the sites. The final measures and details will be confirmed in the CEMP. The Scheme is therefore, in accordance with the relevant parts of the Policy.
Policy CT2 (Movement and Access)	A. Development proposals will be required to minimise the need to travel, promote opportunities for sustainable transport modes, improve accessibility to services and support the transition to a low carbon future. Development proposals will be permitted that: 1. Integrate into our existing sustainable transport networks and do not have an inappropriate impact on the operation, safety or accessibility to the local or strategic highway networks; 2. Mitigate impacts on the local or strategic highway networks, arising from the development itself or the cumulative effects of development, through the provision of, or	This response considers the relevant parts of the policy which relate to the Scheme. Regarding parts A1 and A2 of the policy, the Scheme has been designed to minimise the impact on the surrounding road network. Chapter 13: Transport and Access **[REP2-003]** includes measures to promote highway safety during the construction and operational phases of the Scheme through site management. The details of these are contained in the OCEMP **[REP1-131]** and OOEMP **[EX4/GH7.2_B]**. In addition, a Construction Worker Travel Plan (CWTP) will be drafted and implemented, to encourage construction workers to travel to the Site via sustainable travel, where possible.

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	contributions towards necessary and relevant transport improvements including those secured by legal agreement; 3. Ensure that development proposals do not prejudice the future development or design of suitable adjoining sites; 4. Provide safe, suitable and convenient access for all potential users; 5. Provide on-site layouts that are compatible for all potential users with appropriate parking and servicing provision in line with the Milton Keynes Parking Standards Supplementary Planning Document (January 2016); 6. Do not result in inappropriate traffic generation or compromise highway safety; 7. Offer maximise flexibility in the choice of travel modes, including walking and cycling, shared transport, and with accessibility for all potential users; 8. Protect and where possible enhance access to public rights of way; 9. Provide a public transport connection to the main points of service provision	Regarding part A4 of the policy, ES Chapter 13: Transport and Access **[REP2-003]** sets out the access locations during construction and decommissioning (where there will be the greatest impact). An OCTMP **[REP3-064]** has been prepared, which provides further details on how the Scheme will be accessed by all users safely. With respect to part A5 of the Policy, the Outline Construction Traffic Management Plan **[REP3-064]** confirms that the construction compounds will provide appropriate parking during the construction phase to ensure that there is no parking on the local highway network. With regard to point A6, ES Chapter 13: Transport and Access **[REP2-003]** and the accompanying Transport Assessment **[APP-151]** confirms that the proposed traffic generation (which is greatest during the construction phase) will not have an adverse impact on the highway network. The OCTMP **[REP3-064]** confirms that the traffic movements associated with the Scheme's construction, will be spread around the network and the working day, avoiding peak hours. Regarding part A7, the transport of construction workers for the Scheme is considered in Chapter 13 Transport and Access **[REP2-003]** of the ES, which states that on average, it has

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	including nearest district or town centre, or community facilities; and 10. Where possible, incorporate the use of shared transport and low carbon "green" travel modes such as electric vehicle charging capacity. B. Development proposals that generate significant amounts of movement or impact on level crossings must be supported by a Transport Statement or Transport Assessment and will normally be required to provide a Travel Plan, with mitigation implemented as required. Development proposals which generate a significant number of heavy goods vehicle movements will be required to demonstrate, by way of a Routing Management Plan, that no severe impacts are caused to the efficient and safe operation of the road network and no material harm is caused to the efficient and safe operation of the road network and no material harm is caused to the living condition of residents or the natural environment.	been assumed that a shuttle bus will be able to accommodate 15 workers. As such, a spread of between 40% and 60% of construction workers across the Scheme Sites is expected to arrive by shuttle bus. This is a similar range to other DCO Solar Scheme consents. For example, Longfield Solar Farm (PINS reference EN010118) assumed that 55% of the workforce would arrive by shuttle bus and Cottam Solar Project (PINS reference EN010133) assumed 50%. With respect to part 8, an ORPoWMP **[REP1-147]** has been prepared. This provides a framework for the management of PRoWs throughout the lifetime of the Scheme, to ensure that they remain open, accessible and safe at all times. Regarding part B of the policy, the submission is accompanied by a Transport Assessment **[APP-151]**. A Construction Worker Travel Plan will be secured through the OCTMP **[REP3-064]**. It will be drafted prior to commencement and implemented to encourage construction workers to travel to the Site via sustainable modes of transport, where possible. Given the number of HGV movements during construction, the OCTMP **[REP3-064]** details the proposed HGV construction vehicle routes, which are the shortest distance between the

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		various access points associated with the Scheme and the Strategic Road Network. The OCTMP **[REP3-064]** and OCEMP **[REP1-131]** provide details on how to minimise the impact of the construction on nearby residents and the natural environment. Therefore, the Scheme is in accordance with Part B of this policy.
Policy EH7 (Promoting Healthy Communities)	A. Milton Keynes Council is committed to reducing health inequalities, increasing life expectancy and improving quality of life of the Borough. Proposals should be designed to achieve the aspiration below: 1. Helping to tackle obesity and reduce the levels of physical inactivity through the provision of adequate planning pitches, parks and open spaces, new and existing sports and active recreation facilities and outdoor gyms that are accessible to all. 2. Reducing loneliness by providing buildings and spaces where people can interact, encouraging food supply and healthy eating by providing access to allotments and to a variety of food sources, ensure timely access to services and information by	This response considers the relevant parts of the policy which relate to the Scheme. Regarding part A3 of the policy, an OPRoWMP **[REP1-147]** has been prepared. This provides a framework for the management of PRoWs throughout the lifetime of the Scheme, to ensure that they remain open, accessible and safe at all times. With respect to part A5 of the policy, ES Chapter 16: Air Quality **[APP-052]** considers the impact of the Scheme on sensitive receptors. Embedded mitigation measures have been secured with conclude that the air quality effects are anticipated to be negligible. The impacts are considered acceptable on the amenity of sensitive neighbouring residents. It concludes that the Scheme will not result in adverse impacts upon air quality from odour, fumes, smoke dust and other sources.

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	providing high speed broadband and access to main service locations. 3. Creating and enhancing cycling and walking networks and their environments, such as maintaining and extending the redway network into new developments, as well as supporting the connectivity between local centres and attractions. 4. Securing good design that promotes walking and cycling. 5. Seeking to improve air quality and reduce nose by locating and designing pollution generating land uses and roads to avoid adverse impacts on sensitive land uses and securing necessary mitigation measures to make development acceptable. 6. Providing good quality and well-designed housing. 7. Securing the provision of fully staffed health care facilities and new community facilities, especially within local centres, which are necessary to support new and existing communities.	Regarding part A5, noise generation arising from the Scheme have been identified within ES Chapter 14: Noise and Vibration **[APP-051]**. Through embedded mitigation measures (detailed within Section 14.7 of ES Chapter 14: Noise and Vibration **[APP-051]**), no significant residual effects are predicted during construction, operation and decommissioning of the Scheme on all receptors. Vibration levels from activities (i.e. on-site works and construction HGV traffic) are anticipated to be below SOAEL and as such is equivalent to low magnitude of impact. This is equivalent to a moderate effect which is not considered to be significant. Typical decommissioning noise levels across the overall duration of the decommissioning programme will likely be limited to a low magnitude impact. For receptors of high sensitivity this equates to a moderate adverse effect which is not considered to be significant. With respect to part 9 of the policy, Chapter 13: Transport and Access **[REP2-003]** and the accompanying Transport Assessment **[APP-151]** confirms that the proposed traffic generation (which is greatest during the construction phase) will not have an adverse

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	8. Creating safe residential environments and addressing the fear and perception of crime. 9. Improving road safety. B. The above aspirations should be read together with Sport England Active Design Guidance, which provides advice for making places for the wellbeing of people and communities.	impact on the highway network, in terms of highway safety.
Policy FR1 (Managing Flood Risk)	A. All new development must incorporate a surface water drainage system with acceptable flood control and demonstrate that water supply, foul sewerage and sewage treatment capacity is available or can be made available in time to serve the development. Suitable access is safeguarded for the maintenance of water supply and drainage infrastructure. B. Plan:MK will seek to steer all new development towards areas with the lowest probability of flooding. The sequential approach to development, as set out in national guidance, will therefore be applied across the Borough, taking into account all sources of flooding as contained within the Council's Strategic Flood Risk Assessment (SFRA).	Regarding part A – Drainage Strategies that ensure flood risk it mitigated have been drawn up for each of sites in ES Appendices 10.1 to 10.11 **[APP-098 to APP-107, REP1-053, REP1-055]**. Regarding parts B and C – A Sequential Test and an Exception Test have been provided as Appendix B of the Planning Statement **[EX4/GH7.15_B]**. The Applicant considers that the Scheme passes the Sequential Test requirements. Given that the Scheme falls within areas of Flood Zone 3, the Scheme has been subject to the Exception Test. It has been concluded that the Scheme meets the requirements of the Exception Test. Regarding parts D, E and F – Flood Risk Assessments (FRA) for all sites are provided at ES Appendices 10.1 to 10.11 **[APP-098 to APP-107, REP1-053, REP1-055]**. The FRAs

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	C. Development within areas of flood risk from any source of flooding including, will only be acceptable if it is clearly demonstrated that it is appropriate at that location, and that there are no suitable available alternative sites a lower flood risk. D. Development proposed in an area at risk of flooding will be required: 1. To be supported by a site specific Flood Risk Assessment (FRA) (subject to the triggers set out below); 2. To take into account all forms of flooding including, but not limited to: fluvial, groundwater, surface water and reservoir flooding; 3. To ensure that opportunities to reduce the causes and impacts of flooding to the site and the surrounding area are taken as far as possible, in order to improve the existing situation, taking into account climate change. At a minimum, proposals will need to demonstrate no increase in flood risk to the site or surrounding area. 4. To clearly demonstrate that the benefits of the development to the community, outweigh the risk of	provide detailed assessments of the risk of flooding to and from the Scheme,taking account of climate change, and conclude that the risk of flooding will not be increased as a result of the construction, operation or decommissioning of the Scheme. ES Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]** sets out how flood risk relating to the Scheme is managed and mitigated in conformity with local policies.

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	flooding when applying the sequential test and exception test (where required); 5. When applying the sequential test, to clearly demonstrate that the impacts of climate change are taken into account; 6. To demonstrate the application of a sequential approach to the site design and layout to ensure highest vulnerability land uses are located within areas of the site at lowest risk of flooding; 7. To build resilience into a site's design; 8. To ensure that a site's design and any flood mitigation measures implemented are designed with an allowance for climate change and the potential impact it may have over the lifetime of the proposed development; 9. To provide a safe access and egress route for future users of the development; 10. To attenuate surface water run-off in line with Policy FR2; and 11. To consult the Fire and Rescue Service as to the feasibility of undertaking rescue and recovery	

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	operations during and in the aftermath of flooding events. E. A site specific FRA will be required for: 1. All sites of 1ha or more in Flood Zone 1; 2. All sites within Flood Zone 2 or 3; 3. All sites highlighted as being at high risk from surface water flooding, or which are located within a Critical Drainage Catchment (CDC), as identified in the Milton KEynes Surface Water Management Plan. In this case the FRA will be required to demonstrate that the development will not increase the flood risk to the CDC and where possible will provide an improvement to the existing situation. F. The FRA should include an assessment of flood risk to and from the proposed development, and demonstrate how the development will be safe, will not increase flood risk elsewhere and where possible will reduce flood risk overall in accordance with the NPPF and PPG.	
Policy FR2 (Sustainable Drainage Systems (SUDS) and Integrated Flood Risk Management	A. Plan:MK advocates the continuation of a strategic, integrated approach to managing flood risk which seeks the	ES Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]** sets out how mitigation and management of flood risk has been

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	management of surface water to be planned at the largest appropriate scale for the new development and incorporated into the site at the earliest opportunity in the design process. B. New development is required to incorporate SuDS; in line with national policy and guidance and, which meet the requirements set out in national standards and the Council's relevant local guidance. It is expected that: 1. Flood risk management and SuDS will be provided at a strategic scale and in an integrated manner, wherever possible; 2. Space will be specifically set aside for SuDS and fluvial flood risk reduction features and used to inform the overall layout of development sites; 3. Above ground attenuation will be provided in preference to below ground attenuation; 4. SuDS will be designed as multi-purpose green infrastructure and open space, to maximise additional environmental, biodiversity, social and amenity value, wherever possible. The use of land to provide flood storage	incorporated into the design of the Scheme so that the risk of flooding will not be increased, including through the use of SuDS. Drainage strategies, to be substantially in accordance with the Drainage Strategies which forms part of the Flood Risk Assessments in ES Appendices 10.1 to 10.11 **[APP-098 to APP-107, REP1-053, REP1-055]**, are secured through the draft DCO **[REP3-024]**. These drainage strategies will be in compliance with the requirements of part B of this policy.

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	capacity should not conflict with required amenity and recreation provision, floodplains and floodplain habitats should be safeguarded; 5. SuDS will be designed with an allowance for climate change and the potential impact it may have over the lifetime of the proposed development. 6. Proposals for development within Critical Drainage Catchments, as identified in the Milton Keynes Surface Water Management Plan, should investigate the potential for the scheme to reduce or mitigate existing risk in the surrounding area; 7. All surface water drainage proposals for new development must include full details of the means of achieving future management, maintenance and adoption of the systems, prior to approval of any planning permission, to ensure that it will function effectively over the lifespan of the development. This will include details of funding and should be formulated through discussion with the relevant responsible bodies, including Milton Keynes Council, the Parks Trust,	

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	Anglian Water and the Internal Drainage Board; 8. Development will ensure no adverse impact on the functions and setting of a watercourse and its associated corridor; 9. Development should avoid building over or culverting watercourses, encourage the removal of existing culverts and seek opportunities to create wetlands and wet grasslands and woodlands and restore natural river flows and floodplains.	
Policy FR3 (Protecting and Enhancing Watercourses)	A. All new development must be set back at a distance of at least 8 metres from any main rivers, at least 9 metres from all other ordinary watercourses, or at an appropriate width as agreed by the Environment Agency, Lead Local Flood Authority or Internal Drainage Board, in order to provide an adequate undeveloped buffer zone. Development that restricts future de-culverting of waterways should be avoided. B. The Council will resist proposals that would adversely affect the natural functioning of main rivers, ordinary watercourses and wet or dry balancing	Mitigation measures, including buffering from rivers and watercourses and the avoidance of restrictions on drainage routes, are set out in ES Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]**. With respect to part A, ES Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]** confirms that a minimum 8m buffer has been maintained from all main rivers in line with EA guidance. This buffer has been increased to respond to 9m from other ordinary watercourses, where required by the statutory consultee. Regarding part B, ES Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]** confirms

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	lakes, this includes through the culverting of open channels, unless for access purposes.	that the Scheme has been designed so as not to adversely affect the natural functional of main rivers. Mitigation measures are set out in the OCEMP **[REP1-131]**, OOEMP **[EX4/GH7.2_B]** and ODS **[REP1-135]**.
Policy NE1 (Protection of Sites)	A. Development proposals which would likely cause harm to the nature conservation or geological interest of internationally (RAMSAR sites, SACs and SPAs) important sites will not be permitted unless: 1. There is no suitable alternative to the development; 2. There are imperative reasons of overriding public interest; 3. All reasonable possibilities for mitigation have been put in place; and 4. Compensatory provision in line with the mitigation hierarchy can be secured to ensure that the overall coherence of the site is protected and with the intent to achieve a net gain in biodiversity. B. Development proposals which would likely cause harm to a National Nature Reserve, Site of Special Scientific Interest or	Regarding part A, ES Chapter 9: Ecology and Biodiversity **[REP1-033]** considers the impact of the Scheme on ecological assets. The Site Selection Report **[REP1-037]** confirms that the Applicant did not seek to use land for the Scheme which was located within highly sensitive ecological/biodiversity related designations. The Scheme is not situated in any land which is designated as highly sensitive ecological/biodiversity related designations. The Applicant has proposed suitable protection, mitigation and, where possible, enhancement of ecological designations that are located in proximity to the Scheme. The Scheme is also providing significant biodiversity net gain, as detailed in the Biodiversity Net Gain Assessment **[REP1-043]**. The management and maintenance of the proposed green infrastructure to support the development is secured in the OLEMP **[REP1-137]**. Therefore, the Scheme is in accordance with part A. Regarding part B, as noted above the Scheme is not situated in any land which is designated

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	irreplaceable habitats such as Ancient Woodland will not be permitted unless: 1. There is no suitable alternative to the development; 2. The benefits of the development, at this site clearly outweigh the adverse impacts of the site. 3. All reasonable possibilities for mitigation have been put in place; and 4. Compensatory provision in line with the mitigation hierarchy to ensure that the overall coherence of the site is protected and with the intent to achieve a net gain in biodiversity. C. Development proposals which would be likely to harm the biodiversity or geological conservation value of a site of countywide or local importance as shown on the Policies Map or which serve as a 'biodiversity offset site' will only be permitted where: 1. The local development needs significantly outweigh the biodiversity or geological conservation value of the site;	as highly sensitive ecological/biodiversity related designations. The Applicant has proposed suitable protection, mitigation and, where possible, enhancement of ecological designations that are located in proximity to the Scheme. The Scheme is also providing significant biodiversity net gain, as detailed in the Biodiversity Net Gain Assessment **[REP1-043]**. The management and maintenance of the proposed green infrastructure to support the development is secured in the OLEMP **[REP1-137]**. Therefore, the Scheme is in accordance with part B. With respect to part C, the Scheme overlaps the Earls Barton Meadow Local Wildlife Site but the proposed mitigation measures set out in the OCEMP **[REP1-131]** and OoOEMP **[EX4/GH7.2_B]** would avoid any significant effects during the construction and operational phases. In addition, the SoN **[APP-556]** confirms that the Scheme has the potential to deliver significant amounts of low carbon electricity production to help the UK meeting its legal net zero 2050 requirements. Embedded mitigation measures will be implemented as part of the Scheme, providing significant biodiversity net gain (as set out in the Biodiversity Net Gain Assessment **[REP1-043]**).

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	2. All reasonable possibilities for mitigation have been put in place; and 3. Compensatory provision in line with the mitigation hierarchy can be secured to ensure that the overall coherence of the site is protected and with the intent to achieve a net gain in biodiversity.	It will be secured and maintained through OLEMP **[REP1-137]**. Therefore, the Scheme is in accordance with part C of the policy.
Policy NE2 (Protected Species and Priority Species and Habitats)	A. Where this is a reasonable likelihood of the presence of statutorily protected species or their habitats development will not be permitted unless it has been demonstrated that the proposed development will not result in a negative impact upon those species and habitats. B. Where the site contains priority species or habitats, development should wherever possible promote their preservation, restoration, expansion and/or re-creation in line with Policy NE3.	Regarding part A, the assessment in Section 9.9 of Chapter 9: Ecology and Biodiversity of the ES **[REP1-033]** considers the impacts of the Scheme on statutorily protected species. It sets out embedded mitigation measures to limit the potential impact but also improve the quality of habitats onsite for protected species. With respect to part B, ES Chapter 9: Ecology and Biodiversity **[REP1-033]**, the Scheme will include the retention of strategic areas within the Site, to support suitable habitats for species (e.g. suitable habitat for ground nesting birds), which will be secured in the OLEMP **[REP1-137]**. Additional habitat will also be created for forging bats. There are also proposals to protect existing woodlands, hedgerows and trees, as well as creating new hedgerows to support habitat enhancement. This green infrastructure will contribute towards significant biodiversity

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		net gain as set out in the Biodiversity Net Gain Assessment **[REP1-043]**. Therefore, the Scheme is compliant with this Policy.
Policy NE3 (Biodiversity and Geological Enhancement)	A. Development proposals will be required to maintain and protect biodiversity and geological resources, and wherever possible result in a measurable net gain in biodiversity, enhance the structure and function of ecological networks and the ecological status of water bodies in accordance with the vision and principles set out by the Buckinghamshire and Milton Keynes NEP. B. If significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated or, as a last resort, compensated for, then planning permission should be refused. C. Mitigation, compensation and enhancement measures must be secured and be maintained for the lifetime of the development. Enhancement and compensatory measures should seek opportunities for habitat protection, restoration and creation to meet the objectives of the UK and Bucks & Milton Keynes Biodiversity Action Plan and aims	Regarding part A of the policy, the assessment in Section 9.9 of Chapter 9: Ecology and Biodiversity of the ES **[REP1-033]** considers the impacts of the Scheme on designated sites and concludes that there are no significant effects as a result of operation of the Scheme on any SSSIs. The Scheme therefore accords with this policy. With respect to part B, the OLEMP **[REP1-137]** ensures the beneficial effects of newly created habitats are fully realised to mitigate against any potential harm to biodiversity due to the Scheme. Regarding part C, as set out in OLEMP **[REP1-137]**, the Scheme would provide extensive new tree and hedgerow planting and improvement of existing hedgerows by bolstering with a diversity of appropriate native species and 'gapping-up' where required. These will provide a valuable habitat, forming important wildlife corridors and reinforcing existing ones. The OLEMP **[REP1-137]** ensures the provision of barn owl nest boxes and a variety of other bird boxes and bat boxes to be installed on

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	of the Biodiversity Opportunity Areas. These measures should also create and enhance habitats to help wildlife adapt to the impact of climate change.	trees in key locations to improve nesting and roosting opportunities. The OLEMP **[REP1-137]** contains details of all ecological mitigation and enhancements A Biodiversity Net Gain (BNG) Assessment, using Defra's Metric 4.0, has been provided with the DCO application **[REP1-043]**. This sets out the significant net gains in biodiversity that the Scheme will provide. The Scheme has, therefore, taken advantage of opportunities to conserve and enhance biodiversity and accords with this policy.
Policy NE4 (Green Infrastructure)	A. The network of green infrastructure throughout the Borough will be protected, extended and enhanced for its biodiversity, recreational, accessibility, health and landscape value and for the contribution it makes towards combating climate change. This is in accordance with the vision and principles (and the large-scale zone maps of Green Infrastructure Opportunity) set out by the Buckinghamshire and Milton Keynes NEP. B. Development proposals will provide new green infrastructure or, if it is not possible, will contribute to the enhancement and strengthening of existing green	This response considers the relevant parts of the policy which relate to the Scheme. Regarding part A, ES Chapter 8: Landscape and Visual Impact **[APP-045]** confirms that the **e**nhancement of biodiversity is a key principle of the Scheme as outlined within the Design Approach Document **[APP-560]**, under Principle 2. The existing network of green infrastructure within and surrounding the Sites will be maintained and enhanced. With respect to part B, the following proposed planting would lead to biodiversity net gains: • 14.45ha of green corridor and woodland planting.

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	infrastructure to provide wellbeing benefits to people through access to nature. C. Development proposals will ensure that existing ecological networks are identified and wherever possible maintained to avoid habitat fragmentation, and that ecological corridors, including water courses, form an essential component of their green infrastructure provision to support habitat connectivity. D. Green infrastructure protection, improvements and creation must be prioritised in locations where it can deliver most benefits. It should be multi-functional to delivery as many ecosystem services as the site requires, for example flood mitigation, access to nature (wellbeing benefits), plants for pollinators, carbon sequestration, and habitat for wildlife. E. The existing network of linear parks and linked parks and green spaces will be extended into the urban extensions and along the Ouse and Ouzel Valleys to the north to provide a well connected network of green infrastructure that: 1. Is strategically planned.	• 12.81ha enhanced Riparian Native Planting. • 43.13km of hedgerow reinforcement and reinforced roadside vegetation. • 15.61km of proposed hedgerow. • Six proposed ponds and wader scrapes; and • 1,079.53ha of groundcover. The Scheme has identified existing ecological networks, including water courses to ensure that there this no habitat fragmentation, in accordance with part c). The green infrastructure improvements set out above, have been prioritised where it can deliver the most benefits, in line with part d). This provides mitigation to screen the Scheme from sensitive receptors (as set out in ES Chapter 8: Landscape and Visual **[APP-045]**. The planting contributes towards biodiversity net gain as well as providing additional habitat for wildlife, in accordance with part d). Regarding part f), the OLEMP **[REP1-137]** details how the proposed planting will be maintained and managed throughout the lifetime of the Scheme. The Biodiversity Net Gain Assessment **[REP1-043]** confirms that the

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	2. Is attractive and enhances the surrounding landscape. 3. Is safe and well used for recreation. 4. Meets the needs of existing and future residents. 5. Is designed to provide a range of ecosystem services e.g. manage flood risk or provide flower rich habitats that supports a diverse range of pollinators. 6. Is designed to support mitigation and adaptation to climate change e.g. through vegetation for carbon uptake (carbon sequestration). 7. Achieves a net gain in biodiversity. 8. Is managed into the long-term. 9. Where possible improves connectivity with other green infrastructure networks e.g. by linkages to the urban parks. 10. Where appropriate explores economic opportunities that will support the network's sustainability – for example in conservation, agriculture, renewable energy or outdoor environmental education or recreation; such activity	Scheme is providing significant benefits in excess of 10%. The Scheme has been designed to support the renewable energy Scheme which is described in the Statement of Need **[APP-556]** as being crucial to help meet the UK's net zero 2050 legal requirements.

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	must not result in a negative impact to the integrity of the network, the ecosystem services provided or on biodiversity. F. Where green infrastructure is provided outside the linear parks system, applicants should detail how it will address the above requirements.	
Policy NE5 (Conserving and Enhancing Landscape Character)	A. Where development in the open countryside is acceptable in principle under other policies in this plan, it will need to be undertaken in a manner that respects the particular character of the surrounding landscape. B. In particular, development proposals will need to demonstrate that the following aspects of landscape character have been conserved and where possible enhanced through sensitive design, landscape mitigation and enhancement measures; 1. The locally distinctive natural and man-made features that contribute towards the landscape character and its quality. 2. The historic setting and structure of the villages and hamlets.	With respect to part A, the Scheme is required to be located within the open countryside. The use of previously developed (brownfield) land was considered. There was no brownfield land that meets the minimum individual site size threshold nor the area of approximately 1,100 ha required for a network of sites in proximity for the Scheme, identified within the 20km search area from the Grendon Substation Point of Connection. The Site Selection Assessment is set out in Appendix 5.1 of the ES **[REP1-037]**. Chapter 8: LVIA **[APP-045]** has considered the impact of the Scheme on the surrounding landscape. Regarding, part B,ES Chapter 8: LVIA **[APP-045]** acknowledges that there will be an adverse impact on the landscape due to the Scheme. However, the benefits of the Scheme, as set out at Section 4 of the Planning Statement **[EX4/GH7.15_B]**, in terms of delivering renewable energy infrastructure,

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	3. Important views e.g. of local landmarks. 4. Tranquillity and the need to protect against intrusion from light pollution, noise and motion. C. Development proposals should take into account the findings of the Milton Keynes Landscape Character Assessment (2016) and any other relevant landscape and visual assessments or studies. Where appropriate a site specific landscape and visual impact assessment (LVIA) will be required as part of a planning application and it must be demonstrated that the development proposal has been informed by a LVIA written in accordance with the standard method, Guidance for LVIA version 3 from the Landscape Institute.	which is urgently needed to create a secure and affordable energy system and to help combat climate change. Furthermore, there will be a significant moderate benefit on the landscape fabric at Year 15 and on the decommissioning of the Scheme, due to the Landscape Legacy and retention of the mitigation planting. The OCEMP **[REP1-131]**, OOEMP **[EX4/GH7.2_B]** and ODS **[REP1-135]** provide further information on the mitigation measures to reduce the impact of the Scheme with regard to light pollution, noise and motion. Regarding part c), ES Chapter 8: LVIA **[APP-045]** has considered the findings of the Milton Keynes Landscape Character Assessment 2022, which supersedes the 2016 version set out in this policy. The LVIA Methodology **[APP-078]** confirms that the Scheme has been informed by a LVIA written in accordance with the latest guidance from the Landscape Institute in accordance with part c). Therefore, the Scheme is in accordance with this policy.
Policy NE6 (Environmental Pollution)	A. When considering development proposals, the Council will adopt the approach set out below to ensure that pollution will not have an unacceptable impact on human health, groundwater,	With respect to parts b) and c), regarding contamination land and soil pollution, ES Chapter 22: Ground Conditions and Contamination **[REP1-025]** confirms that a Construction Environmental Management Plan (CEMP) and Decommissioning Environmental

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	general amenity, biodiversity or the wider natural environment. **Contaminated Land and Soil Pollution** B. Planning applications for proposals for the following sites must be accompanied by a Preliminary Contaminated Land Risk Assessment to determine the likelihood of any ground, groundwater or gas contamination of the sites: 1. Land formerly used for industrial, commercial or utilities purposes; 2. Land which is considered to be potentially contaminated, contaminated or impacted by adjacent contamination. 3. Land where the proposed use is particularly vulnerable to the presence of contamination. C. Proposals which, by their nature, risk contributing to soil and water pollution will be required to demonstrate how this risk will be avoided or mitigated to an acceptable level. **Air Quality** D. Prevailing air quality and potential impacts upon air quality arising from airborne	Management Plan (DEMP) will be required for the construction and decommissioning phases through a requirement in the DCO, which will be based on the OCEMP **[REP1-131]**, OOEMP **[EX4/GH7.2_B]** and ODS**[REP1-135]**. The plans will describe the construction and decommissioning related mitigation measures and good practices to ensure any environmental impacts in terms of land and groundwater contamination are minimal. Therefore, the Scheme is compliant with Parts B and C of the policy. With respect to part d), regarding Air Quality, ES Chapter 16: Air Quality **[APP-052]**. Embedded mitigation measures have been secured with conclude that the air quality effects are anticipated to be negligible. The impacts are considered acceptable on the amenity of sensitive neighbouring residents. It concludes that the Scheme will not result in adverse impacts upon air quality from odour, fumes, smoke dust and other sources. Therefore, the Scheme is in accordance with Parts D-F. Regarding part g), noise generation arising from the Scheme have been identified within ES Chapter 14: Noise and Vibration **[APP-051]**. Through embedded mitigation measures

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	emissions, dust and odour associated with the construction and operation of a proposal (including vehicular traffic) will be considered when determining planning applications. Proposals that would result in or be subject to unacceptable risk to human health and the natural environment from air pollution, or would prejudice compliance with national air quality objectives, will be refused. E. An Air Quality Assessment that demonstrates how prevailing air quality and potential impacts upon air quality have been considered, and how air quality will be kept to an acceptable standard through avoidance and mitigation, will be required for major and minor development proposals if any of the following apply: 1. The development is likely, due to the nature of the proposal, and through in-combination effects, to give rise to significant air pollution. 2. The site is within an Air Quality Management Area. 3. The site is within 50 metres of a major road or heavily trafficked route.	(detailed within Section 14.7 of ES Chapter 14: Noise and Vibration **[APP-051]**), no significant residual effects are predicted during construction, operation and decommissioning of the Scheme on all receptors. Vibration levels from activities (i.e. on-site works and construction HGV traffic) are anticipated to be below SOAEL and as such is equivalent to low magnitude of impact. This is equivalent to a moderate effect which is not considered to be significant. Typical decommissioning noise levels across the overall duration of the decommissioning programme will likely be limited to a low magnitude impact. For receptors of high sensitivity this equates to a moderate adverse effect which is not considered to be significant. Therefore, the Scheme is in accordance with parts F-G. Regarding part I, artificial lighting will be required during construction and decommissioning in areas where natural lighting is unable to reach (sheltered/confined areas), and during core working hours within winter months. All construction lighting will be deployed in accordance with the recommendations set out in the OCEMP **[REP1-131]** and will minimise potential for light

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	4. The site is within proximity to a source of air pollution which could present a significant risk to human health; and/or 5. The type of development would mean its occupiers would be particularly sensitive to air pollution, such as schools, health care establishments or housing for older people. F. The potential impact of proposals upon odour levels, or their sensitivity to prevailing sources and levels of odour, should be considered and addressed. Where appropriate, the Council will require an Odour Impact Assessment to be provided, including an Odour Management Plan where necessary. **Noise and Vibration** G. A Noise and Vibration Impact Assessment will be required for proposals with the potential to cause disturbance to people or the natural environment due to noise and/or vibration and for proposals that are considered to be sensitive to noise and/or vibration. Proposals that would result in or be subject to noise pollution and/or vibration that is: 1. Very disruptive and would have an unacceptable adverse effect on	spillage outside the Scheme and Cable Corridor, particularly towards houses, traffic and ecological habitats. Details of operational lighting are set out by Chapter 4: Scheme Description of the ES **[REP1-031]**. This explains that no part of the Scheme will be continuously lit. Manually operated, and motion detection lighting will be utilised for operational and security purposes around electrical infrastructure. Lighting will be directed downward and away from boundaries. No visible lighting will be utilised at the site perimeter fence, aside from the site entrance points.

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	human health or the natural environment or the tranquility and enjoyment of the countryside will be refused unless the need for, and benefits of, the development significantly outweigh the harm and all feasible solutions to avoid and mitigate that harm have been fully implemented. H. Proposals adjacent or within 100m of existing or proposed major roads, heavily trafficked roads, and railways will be required to adopt setbacks and landscaping measures to provide screening and acoustic buffers to protect the amenity of proposed buildings and areas of outdoor amenity space. **Light Pollution** I. Proposals that include external lighting schemes, including floodlighting, will be approved where it can be demonstrated through a Lighting Assessment that all of the following criteria can be satisfied: 1. The lighting scheme is the minimum required for security and operational purposes; 2. Glare and light spillage are minimised;	

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	3. The amenity of residential areas is not adversely affected; 4. There would be no unacceptable adverse impact on the character and beauty, openness, tranquillity, dark landscapes or enjoyment of the night sky of the countryside; 5. The visual character of historic buildings and conservation areas are not adversely affected; 6. There would be no dazzling or distraction of drivers using nearby roads; 7. There would be no unacceptable adverse effects on species, habitats or the wider natural environment.	
Policy NE7 (Protection of the Best and Most Versatile Agricultural Land)	In assessing proposals for the development of greenfield sites, the Council will take into account the economic and other benefits of the best and most versatile agricultural land. Development involving the loss of agricultural land should seek to use areas of poorer quality land (grades 3b, 4 and 5 of the Agricultural Land Classification) in preference to that of a higher quality unless other sustainability considerations suggest otherwise.	The majority of the land in the Scheme is arable. The desk study and field surveys indicate that the soils of the Sites are predominantly slowly permeable, calcareous or non-calcareous clayey soils. The ALC Grades of the Sites and Cable Route Corridor range from Grade 1 to 3b. The Best and Most Versatile (BMV) land covers 854.5 hectares, making up 65% of the Order Limits.

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		Although the majority (65%) of the Order Limits comprises BMV agricultural land, these are justified by particular factors related to their location and context within the Scheme, the wider landholding and in relation to adjacent and surrounding land. Table 5:9: Stage 4 – Design Updates up to DCO Submission of ES Chapter 5: Alternatives and Design Evolution **[APP-042]** sets out the changes made to the Scheme following the detailed ALC Technical Report **[APP-172]** and provides the detailed justification for retaining the areas of BMV for the Scheme as well as an assessment of alternative sites for the Scheme.
Policy HE1 (Heritage and Development)	A. Proposals will be supported where they sustain and, where possible, enhance the significance of heritage assets which are recognised as being of historic, archaeological, architectural, artistic, landscape or townscape significance. These heritage assets include: 1. Listed Buildings; 2. Conservation Areas; 3. Scheduled Ancient Monuments and non-designated Archaeological sites; 4. Registered Parks and Gardens;	Regarding part A, the historic environment impacts of the Scheme and the impacts associated significance in relation to above, at, and below ground level during construction, operation and decommissioning has been explored within Section 12.8 of the ES, Chapter 12: Cultural Heritage **[APP-049].** Regarding part B, the Archaeological Mitigation WSI **[EX4/GH6.3.12.6_A]** ensures the Scheme complies with Part I of the policy.

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	5. Assets on the MK New-Town Heritage Register; and 6. Other places, spaces, structures and features which may not be formally designated but considered to meet the definition of 'heritage assets' as defined in Annex 2 of the NPPF. B. Where appropriate, development proposals must provide an impartial and objective heritage assessment. Where necessary, the Council will require suitably qualified specialists to undertake the heritage assessment. The heritage assessment shall: 1. Assess and describe the significance of the heritage assets affected, identifying those elements that contribute to that significance and, where appropriate, those that do not. The level of detail shall be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of proposals on their significance. Limited and localised alterations to an unlisted building in a conservation area need not be supported by the level of detail required to convey the impact on	

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	significance caused by development in the setting of a listed building or by proposed alterations to the built fabric of a listed building. 2. Be of an analytical and interpretive nature rather than simply provide a description of the assets and the proposed works. 3. Provide a sound justification for the works, based on the economic, social and environmental benefits delivered by the scheme, for example, promoting the long term care for a heritage asset and/or its setting. 4. Explain how the scheme has taken account of the significance of the assets in its scope, design and detail, in order to minimise or avoid harm to the heritage assets affected. 5. Assess the nature and extent of any harm or public benefit arising from the scheme. 6. Where harm is caused by the proposal, the assessment shall explain why such harm is unavoidable or required to deliver public benefits that outweigh the harm caused.	

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	C. Where applications seek to change the use of a listed building, evidence should be submitted to demonstrate that the proposal includes the full scope of works required to achieve that use (such as those that will be required by Building Regulations, the Fire Authority, Environmental Health etc.). Where a change of use requires a significant alteration or structural works, an engineer's report shall be submitted to demonstrate that the building is capable of conversion, set out the full extent of works and show how they have taken account of 2 a) above. D. Granting of permission for proposals that result in substantial harm to or total loss of the significance of a designated heritage asset will only be exceptional or wholly exceptional in accordance with national policy and guidance. E. Permission for proposals that cause less than substantial harm to a designated heritage asset will only be granted where the harm is demonstrably outweighed by public benefits delivered by the scheme. F. Proposals that result in harm to the significance of non-designated heritage assets will be resisted unless the need for,	

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	and benefits of the development clearly outweigh the harm, taking into account the asset's significance and importance and only once all feasible solutions to avoid and mitigate that harm have been fully implemented. G. In assessing any potential harm or enhancement to the significance of a heritage asset(s) the following will be considered: H. Where 'enabling development' is proposed, the Council will expect the proposal to accord with Historic England's published guidance. The applicant will provide accurate evidence to establish that a 'heritage deficit' exists. It is not the role of 'enabling development' to reimburse owners or applicants who have paid above the market value of asset, that value being based on the current condition of the asset. I. Proposals will be accompanied by an appropriate desk-based assessment and field evaluation where development is proposed affecting an unscheduled site of known archaeological interest or with the potential to include heritage assets with archaeological interest (General	

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	requirement for applications affecting heritage assets). J. The ability to record evidence of our past should not be a factor in deciding whether the loss of significance should be permitted. Where harm to or loss of heritage assets occurs as a consequence of development it will be necessary for developers to record and advance understanding of the significance of the affected assets in a manner proportionate to their importance and the impact (NPPF paragraph 141). Recording techniques should keep in step with current best practice and in particular the use of photogrammetry and fine grain LIDAR ground scans where unavoidable loss will occur. In the case of heritage assets of greater than local importance the results of this recording work should be published in the relevant local or period journal or in book form according to remains are found, provision shall be made for public open days, exhibitions and/or popular publications/booklets. Where archaeological remains are preserved within public open space appropriate on-site interpretation and a strategy for long term care (and funding thereof) shall be produced as part of a holistic approach to	

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	the long term stewardship of the open space in question and agreed with the body responsible for the same. When recording or assessment results in a physical archive for deposition at an appropriate museum or archive facilities, consideration of resources for its storage, interpretation and public access should be made in order to capture the heritage significance of that asset for future generations.	
Policy D1 (Designing a High Quality Place)	A. Development proposals will be permitted if they meet the following objectives/principles: 1. The development proposals as a whole respond appropriately to the site and surrounding context. 2. Continuity of street frontage and locating fronts of buildings to face the street or public space. 3. Appropriate framing of space to define public and private areas, with front gardens designed to be clearly private through appropriate boundary treatments and use of hard surfaces that also maintaining an active frontage and passive surveillance of the street.	This response only considers the relevant parts of the policy in relation to the Scheme. With respect to part A, as set out in Section 6.4 of the Planning Statement **[EX4/GH7.15_B]** and described within ES Chapter 8: Landscape and Visual Impact **[APP-045]**, the Scheme has been the subject of an iterative design process, informed by analysis of landscape and visual constraints, iterative impact assessments and mitigation proposals. Regarding part 5 of the policy, the mitigation strategy and design development are based on the Landscape Design Parameters set out at Table 8.7 of ES Chapter 8: Landscape and Visual Impact **[APP-045]**. This has helped ensure that primary landscape mitigation is co-ordinated with other relevant

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	4. The layout should maximise the surveillance of the public realm, prevention of crime and minimise the perception of crime. 5. Soft and hard landscaping that continues the verdant and green character of Milton Keynes, enhances the quality of the public realm, is robust to the demands placed upon the public realm, and is appropriate to their context and can be maintained and managed without significant whole life-costs. In particular, street trees and planting are incorporated to soften the streetscape and ensure the public realm is not dominated by hard surfaces and boundaries by parked cars. 6. Landscape and boundary treatments integrate with and/or enhance those of the surrounding area. 7. Ease of movement by creating places that are permeable and well connected with a safe, attractive and convenient hierarchical network of routes that balances the provision for walking, cycling and public transport with that for private motor vehicles.	disciplines, such as ecology, to determine the key parameters and agree offsets to improve the value of landscape and reflect appropriate local, regional and national aims and objectives for ecology and biodiversity. Regarding part 6, ES Chapter 8: Landscape and Visual Impact **[APP-045]** confirms that the Scheme will have a significant moderate beneficial effect on the landscape fabric at Year 15 of operation. This is due to the Scheme providing significant landscape enhancements which comprise: • 14.45ha of green corridor and woodland planting. • 12.81ha enhanced Riparian Native Planting. • 43.13km of hedgerow reinforcement and reinforced roadside vegetation. • 15.61km of proposed hedgerow. • Six proposed ponds and wader scrapes; and A. 1,079.53ha of groundcover.

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	8. Legibility by providing recognisable streets, districts, nodes, edges and landmarks to help people to find their way around. 9. Where applicable, a variety of layouts, street types, building sizes and forms, landscapes, uses and housing tenures across the development.	
Policy D2 (Creating a Positive Character)	A. Development proposals will be permitted if they meet the following objectives/principles: 1. The layout, massing/scale, boundary treatments and landscaping of a development and appearance of buildings exhibit a positive character or sense of place for a development. 2. The character of the development is locally inspired where appropriate (for example in or adjacent to conservation areas, or in existing areas with a strong positive character). 3. Where there is no positive built form character on the site or surrounding area, new development is designed to create its own distinctive character or sense of place using existing site features, the layout of the	This response only considers the relevant parts of the policy in relation to the Scheme. With respect to point 1, as set out in Section 6.4 of the Planning Statement **[EX4/GH7.15_B]** and described within ES Chapter 8: Landscape and Visual Impact **[APP-045]**, the Scheme has been the subject of an iterative design process, informed by analysis of landscape and visual constraints, iterative impact assessments and mitigation proposals. With respect to part 4, the mitigation strategy and design development are based on the Landscape Design Parameters set out at Table 8.7 of ES Chapter 8: Landscape and Visual Impact **[APP-045]**. This has helped ensure that primary landscape mitigation is co-ordinated with other relevant disciplines, such as ecology, to determine the key parameters and agree offsets to improve the value of landscape and reflect appropriate

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	development and the appearance of buildings. 4. The design allows for visual interest through the careful use of detailing where this is appropriate to the character of the area.	local, regional and national aims and objectives for ecology and biodiversity. ES Chapter 8: LVIA **[APP-045]** confirms that the Scheme will have a significant moderate beneficial effect on the landscape fabric at Year 15 of operation. This is due to the Scheme providing significant landscape enhancements which comprise: • 14.45ha of green corridor and woodland planting. • 12.81ha enhanced Riparian Native Planting. • 43.13km of hedgerow reinforcement and reinforced roadside vegetation. • 15.61km of proposed hedgerow. • Six proposed ponds and wader scrapes; and B. 1,079.53ha of groundcover.
Policy SC1 (Sustainable Construction)	A. Development proposals will be required to demonstrate how they have implemented the principles and requirements set out below. With the exception of requirements K.2/3/5, non-residential development of 1,000sqm or more that is demonstrated to achieve a BREEAM Outstanding rating	With respect to part A, ES Chapter 7: Climate Change **[APP-044]** has calculated the carbon emissions produced by the Scheme but has also confirmed the amount of carbon emissions that will be saved over the operational lifetime of the project compared with the same electricity generated by a combined-cycle gas turbine. It

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	will not be required to meet the requirements below. **Minerals and Waste** B. Reuse land and buildings wherever feasible and consistent with maintaining and enhancing local character and distinctiveness. C. Reuse and recycle materials that arise through demolition and refurbishment, including the reuse of excavated soil and hardcore within the site. D. Prioritise the use of materials and construction techniques that have smaller ecological and carbon footprints, help to sustain or create good air quality, and improve resilience to a changing climate where appropriate. E. Incorporate green roofs and/or walls into the structure of buildings where technically feasible to improve water management in the built environment, provide space for biodiversity and aid resilience and adaptation to climate change. F. Consider the lifecycle of the building and public spaces, including how they can be easily adapted and modified to meet	states that 186,306 tCO2e will be saved over the Scheme's 60-year operational life, thereby providing significant benefits. With respect to Part B, ES Chapter 7: Climate Change **[APP-044]** sets out specific mitigation measures in the OCEMP **[REP1-135]** to reduce the carbon emissions of the Scheme. These specific measures including increasing recyclability by segregating construction waste to be re-used and recycled where possible and using alternative materials which are more locally sourced and have lower embodied carbon. With respect to part D, any impacts from the Scheme can be sufficiently mitigated through adherence to the measures set out in the OCEMP **[REP1-131]** and ODS **[REP1-135]** Regarding part F, ES Chapter 7: Climate Change **[APP-044]** provides a summary of how the Scheme seeks to reduce carbon emissions throughout its lifetime. It concludes that up to 186,306tCO_2e will be saved over the operational lifetime of the Scheme in comparison to the same electricity generated by a combined-cycle gas turbine. Regarding part G, ES Chapter 24: Other Environmental Matters **[REP1-027]** includes a section on waste management. It confirms that

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	changing social and economic needs and how materials can be recycled at the end of their lifetime. G. Space is provided and appropriately designed to foster greater levels of recycling of domestic and commercial waste. **Energy and Climate** H. Implement the Energy Hierarchy within the design of new buildings by prioritising fabric first, passive design and landscaping measures to minimise energy demand for heating, lighting and cooling. I. Review the opportunities to provide energy storage and demand management so as to tie in with local and national energy security priorities. J. The design of buildings and the wider built environment is resilient to the ongoing and predicted impacts of climate change. K. Development proposals for 11 or more dwellings and non-residential development with a floor space of 1000sqm or more will be required to submit an Energy and Climate Statement that demonstrates how the proposal will achieve the appliable requirements below:	the Scheme will be following the waste mitigation hierarchy. The Scheme includes a BESS which will collect electricity generated via substation through underground cables and connect to the National Grid at Grendon National Grid Substation. The BESS will be broken into discrete groups consisting of battery containers and inverters and transformers. Battery enclosures will house the battery systems, electrochemical components and associated equipment. The Outline Battery Storage Safety Management Plan (OBSSMP) **[REP1-143]** demonstrates the mitigation of the safety risks posed by the BESS in the Scheme. Regarding the Energy and Climate Section, ES Chapter 7: Climate Change **[APP-044]** provides a summary as to how the Scheme seeks to reduce carbon emissions throughout its lifetime. It concludes that up to 186,306tCO_2e will be saved over the operational lifetime of the Scheme in comparison to the same electricity generated by a combined-cycle gas turbine, thereby providing a beneficial effect on the global climate.

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	1. Achieve a 19% carbon reduction improvement upon the requirements within Building Regulations Approved Document Part L 2013 or achieve any higher standard than this that is required under new national planning policy or Building Regulations. 2. Provide on-site renewable energy generation, or connection to a renewable or low carbon community energy scheme, that contributes to a further 20% reduction in the residual carbon emissions subsequent to 1) above. 3. Make financial contributions to the Council's carbon offset fund to enable the residual carbon emissions subsequent to the 1) and 2) above to be offset by other local initiatives. 4. Calculate Indoor Air Quality and Overheating Risk performance for proposed new dwellings. 5. Implement a recognised quality regime that ensures the 'as built' performance (energy use, carbon emissions, indoor air quality, and overheating risk) matches the calculated design performance of dwellings in 4) above.	

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	6. Put in place a recognised monitoring regime to allow the assessment of energy use, indoor air quality, and overheating risk for 10% of the proposed dwellings for the first five years of their occupancy, and ensure that the information recovered is provided to the applicable occupiers and the planning authority. **Water** L. All newly constructed dwellings will be required to achieve an estimated water consumption of no more than 100 litres/person/day. M. Water reuse and recycling and rainwater harvesting should also be incorporated wherever feasible to reduce demand on mains water supply, subject to viability. Proposals will be expected to maximise the use of the above measures subject to the outcome of the viability assessment. **Retrofitting** N. Proposals which would result in considerable improvements to the energy efficiency, carbon emissions and/or general suitability, condition and longevity of existing buildings will be supported,	

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	with significant weight attributed to those benefits.	
Policy SC2 (Community Energy Networks and Large Scale Renewable Energy Schemes)	A. Low carbon and renewable energy schemes will be attributed significant weight in their favour, and will be supported where it can be demonstrated that there will not be any significant negative social, economic, or environmental impacts associated with them. B. Proposals for over 100 homes and non-residential developments of over 1,000sqm will be expected to consider the integration of community energy networks in the development. This consideration should form part of development proposals and take into account the site's characteristics and the existing cooling, heat and power demands on adjacent sites. C. All new developments in proximity of an existing or proposed combined heat and power (CHP), combined colling, heat and power (CCHP) station or local energy network will be expected to connect to the network unless it can be demonstrated that:	The Scheme is providing solar energy, which is a renewable energy scheme and therefore, should be supported as set out in part A. The Statement of Need **[APP-556]** accompanying the DCO application sets out a detailed compelling case for why the Scheme is urgently required and at the scale proposed. The Environmental Statement **[APP-037-APP-544]** that accompanies the application has considered the impact of the Scheme and concludes that there are no significant negative social, economic or environmental impacts associated with the Scheme.

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	1. A better alternative for reducing carbon emissions from the development can be achieved; or 2. Heating and/or colling loads of the scheme do not justify a CHP connection; or 3. The cost of achieving this would make the proposed development unviable.	
Policy SC3 (Low Carbon and Renewable Energy Generation)	A. The Council will encourage proposals for low carbon and renewable energy generation developments that are led by or meet the needs of local communities. B. Planning permission will be granted for proposals to develop low carbon and renewable energy sources (including community energy networks) unless there would be: 1. Significant harm to the amenity of residential area, due to noise, traffic, pollution or odour; 2. Significant harm to wildlife species or habitat; 3. Unacceptable landscape and visual impact on the landscape, including cumulative impacts;	The Statement of Need **[APP-556]** accompanying the DCO application sets out a detailed compelling case for why the Scheme is urgently required and at the scale proposed at a local and national level, which is supported by Part A of the policy. Regarding part B, the Environmental Statement **[APP-037-APP-544]** that accompanies the application has considered the impact of the Scheme and concludes that there are no significant negative social, economic or environmental impacts associated with the Scheme. In respect to point B1., ES Chapter 14 Noise and Vibration **[APP-051]** confirms that the impacts during the operational phase of the Scheme will be negligible. The OOEMP will be used during the operational stage of the Scheme to implement noise quieting measures. **[EX4/GH7.2_B]**. The OCEMP **[REP1-131]**

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	4. Unacceptable harm to the significance of heritage assets; and 5. Unacceptable impact on air safety. C. In addition to the above criteria, wind turbines should avoid unacceptable shadow flicker and electro-magnetic interference and be sited an appropriate distance away from occupied properties, consistent with the size and type and the turbine. Proposals to develop solar PV farms should avoid unacceptable visual impact from the effect of glint and glare on the landscape, on neighbouring uses and aircraft safety. Proposals for large scale renewable energy in the open countryside should be informed by a satisfactory landscape and visual impact assessment. D. In the case of energy generation through wind power, permission will only be granted for proposals where: 1. The proposed site is identified in a Neighbourhood Development Plan or other Development Plan Document as a suitable site for wind energy generation; and 2. Following consultation with local residents, it can be demonstrated that the planning impacts identified can be	includes best practice measures for the management of noise during the construction phase. Regarding point B1., ES Chapter 13: Traffic and Access **[REP2-003]** confirms that the Outline Operational Construction Traffic Management Plan **[REP3-064]** provides a framework for the management of construction vehicles, ensuring that the temporary effects on the highway network are minimised. With respect to Point B1., ES Chapter 16 Air Quality **[APP-053]** confirms that the impacts during the operational phase of the Scheme will be negligible. The OCEMP **[REP1-131]** includes best practice measures during construction to demonstrate that there will be no unacceptable impact on the amenity of amenity of local residents. Regarding point B2., the assessment of Ecological impacts is set out in ES Chapter 9: Ecology and Biodiversity **[REP1-033]**. Section 6.7 of the Planning Statement **[EX4/GH7.15_B]** concludes that with the embedded mitigation measures proposed which are wide-ranging and respond directly to the type of species and habitats that are affected, the Scheme is expected to have an overall significant benefit.

Table 16: Milton Keynes Plan:MK 2016 to 2031 (Adopted 2019) (MKLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	fully addressed, and therefore the proposal has the backing of the local community; and 3. The proposal complies with nation and local guidance, including the Council's Wind Turbines SPD and Landscape Sensitivity to Wind Turbine and Solar PV Development document.	A Biodiversity Net Gain (BNG) Assessment, using Defra's Metric 4.0 has been provided within the DCO application **[REP1-043]**. This sets out the significant net gains in biodiversity that the Scheme will provide. The Scheme has therefore taken advantage of opportunities to conserve and enhance biodiversity. With respect to B3, Chapter 8: Landscape and Visual Impact **[APP-045]** has assessed the Scheme and considered the cumulative impacts. Although it acknowledges that there will be an adverse impact on the wider landscape area and on some receptors (e.g. residential dwellings, footpaths and roads) throughout the lifetime of the Scheme, the Scheme is providing significant landscaping mitigation, which means that, at Year 15, the landscape fabric has significant moderate beneficial effects. Regarding B4, Section 12.8 of Chapter 12: Cultural Heritage of the ES **[APP-049]** contains a clear and detailed assessment of likely impacts and effects of the Scheme on cultural heritage. It concludes that there will be no significant impacts to any designated or non-designated heritage assets, including Listed

Table 16: Milton Keynes Plan:MK 2016 to 2031 (Adopted 2019) (MKLP)		
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		Buildings or Historic Landscape Character as a result of the Scheme. Regarding point C, Chapter 15 of the ES Glint and Glare **[APP-052]** and has undertaken an assessment of potential impacts of glint and glare on surrounding road users, railway operations, dwellings, PRoW, bridleways and aviation activity. The assessment concludes that subject to embedded mitigation measures no significant impacts are predicted from glint and glare.

3.8 Emerging MK City Plan 2050

Table 17: Emerging MK City Plan 2050 (EMKLP) - Regulation 19 (November 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Policy GS1 (Our Spatial Strategy)	A. Development within Milton Keynes up to 2050 will be directed toward locations in accordance with the following settlement hierarchy: 1. Tier 1 – The City of Milton Keynes as shown on the Policies Map, will be where the majority of development to meet our identified needs will be provided. 2. Tier 2 – Development located within the defined settlement boundaries of Olney and villages beyond the City of Milton	Due to the scale of the land required to deliver the substantial renewable energy generation capacity that the Scheme will provide, and the need to be in sufficient proximity of the connection point to the National Electricity Transmission System (NETS), the Scheme could not be located within an urban area or settlement boundary as explained within the Site Selection Assessment **[REP1-037]**. Therefore, the Scheme is in accordance with the Policy.

Table 17: Emerging MK City Plan 2050 (EMKLP) - Regulation 19 (November 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	Keynes should focus on meeting local needs, including locations identified in relevant made Neighbourhood Plans.	
Policy GS3 (Strategy for Economic Prosperity)	A. The development of employment land will be directed to locations shown on the Policies Map and as follows: 1. Around 420,000sqm (gross), 300,000sqm (net) of office and research and development floorspace, with additional floorspace for education, alongside this, will be provided within Central Milton Keynes principally within the Downtown Business Quarter consisting of Blocks A1-4, and B1-3 and the Tech and Innovation Area within Block B4 in line with Policy CMK1; and 2. Approximately 210.2ha of employment land. B. Development proposals for the refurbishment, reuse and/or extension of buildings and/or for the redevelopment of existing employment land for employment uses will be supported, with strong support for such proposals within the Downtown Business Quarter in Central Milton Keynes.	Chapter 17: SETR of the ES **[APP-054]**, considers the socio-economic impact of the Scheme. It also sets out that in procurement of the contractor to complete the construction works, strong consideration will be given to their strategy for engaging the local supply chain and using local materials where possible and practical. The permanent jobs created to support the Scheme are a reflection of the requirements to maintain the infrastructure. Regarding part D, an OSSCEP **[APP-552]** has been submitted with this application. A detailed Skills, Supply Chain and Employment Plan will be prepared prior to the commencement of construction. This will set out measures that the Applicant will implement in order to: • Advertise and promote employment opportunities associated with the Scheme in construction and operation locally. • Advertise those elements of the supply chain required for the construction and operation of the authorised development and which provide opportunities for Local Companies.

Table 17: Emerging MK City Plan 2050 (EMKLP) - Regulation 19 (November 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	C. Development proposals related to the operation and/or expansion of further and higher education institutions providing training, learning or skills development will be strongly supported. D. Development proposals that facilitate the provision of digital communications infrastructure will be supported. E. Development proposals associated within maintaining, improving or delivering new Metro and public transport infrastructure and services will be strongly supported. F. Development proposals that would provide additional floorspace associated with research and development uses will be strongly supported. G. Development proposals providing office floorspace in the range of 93 to 232sqm (gross), serviced office accommodation of up to 465sqm (gross) or industrial/warehousing floorspace of 465 to 929 sqm (gross) will be supported.	
Policy GS6 (Open Countryside)	A. Land outside settlement boundaries as defined on the Policies Map, or any subsequent made Neighbourhood Plans, is designated as Open Countryside.	The Scheme is located within the Open Countryside as defined by Part A. Regarding part B, due to the scale of the land required to deliver the substantial renewable energy generation capacity that the Scheme will

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	B. the Open Countryside permission will only be granted for development proposals that maintain the openness and character of the surrounding Open Countryside landscape in accordance with Policy CEA12 and which satisfy at least one of the following criteria: 1. The development is for agricultural or forestry purposes, countryside recreation, creation or enhancement of green or blue infrastructure, highway infrastructure, or other development which can be demonstrated as requiring a location within the Open Countryside. 2. The development would satisfy the essential need for a rural worker, including those taking majority control of a rural business, to live at or near their place of work in the countryside where the applicant has demonstrated that: a) There is a need for a rural worker to live at, or in close proximity to, their	provide, and the need to be in sufficient proximity of the connection point to the National Electricity Transmission System (NETS), the Scheme could not be located within an urban area or settlement boundary as explained within the Site Selection Assessment **[REP1-037]**. ES Chapter 8: Landscape and Visual Impact **[APP-045]** has assessed the Scheme throughout its operational lifetime considers the proposals against Policy CEA12 (further information of which is set out below). Regarding Part 3, the Scheme complies with the criteria set out in Policy ECP5 and Policy CEA13. Further details on how the scheme complies with these policies is set out below. Policy HQH8 is not considered relevant for this scheme. Therefore, the Scheme is in accordance with the Policy.

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	place of work in order to be readily available at all times to enable the effective, safe and viable operation of the rural enterprise. b) The rural enterprise is economically sustainable and is expected to remain financially viable for the foreseeable future; and c) The size and scale of the proposed dwelling is proportional to the needs of the rural enterprise. 3. Development proposals that would comply with the criteria set out within Policy ECP5, Policy CEA13 and Policy HQH8. 4. The development would represent the optimum viable use of a heritage asset. 5. The development would re-use redundant or disused buildings to a similar footprint and volume of the existing buildings and enhance its immediate setting.	

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	6. The subdivision of an existing residential building. 7. The subdivision of an existing residential building. 8. The development of replacement isolated homes where the design of the proposed would: a) Be compact and retain sufficient space around the dwelling to provide an attractive setting and protect the character of the countryside; and b) Be substantially the same footprint and volume of the existing dwelling it intends to replace; or c) Be of exceptional quality, in that it: i. Is truly outstanding, reflecting the highest standards in architecture. ii. Would help to raise standards of design	

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	more generally in rural areas. iii. Would significantly enhance its immediate setting; and iv. Be sensitive to the defining characteristics of the local area. 9. The development of new isolated homes where the design of the proposal would be of exceptional quality, in that it: a) Is truly outstanding, reflecting the highest standards in architecture. b) Would significantly enhance its immediate setting; and c) Be sensitive to the defining characteristics of the local area.	
Policy GS7 (Wind Turbine and Solar PV Spatial Strategy)	A. The preferred areas for solar development are those designated as a	Site G (within Milton Keynes's boundary) is situated within the Solar Farm Development

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	Solar Development Area of Search, as shown on the Policies Map. B. The preferred areas for wind development are those designated as a Wind Development Area of Search, as shown on the Policies Maps. C. Proposals for solar and wind development will be supported if it can be demonstrated that the proposals would: 1. Provide a suitable restoration plan and after use for the land consider the land's current use and site context; and 2. No lead to adverse cumulative impacts in combination with other energy development in the surrounding area. D. The provision of solar panels and canopies above open-air surface level and/or on multi-storey parking and on other buildings, will be strongly supported.	Area of Search, detailed on the policies map and is therefore in accordance with part A. Regarding part C1. Restoration, the detailed versions of the OCEMP **[REP1-131]** and the Decommissioning Statement **[REP1-135]** are secured via requirements 14 and 21 respectively under the Draft DCO **[REP1-008]**. These will be approved by the relevant local planning authority prior to the relevant stage of either construction or decommissioning and include measures to protect the land during construction so it can be restored following decommissioning. Regarding part C2, ES Chapter **25: Cumulative Effects and Effect Interactions [APP-062]** sets out the in-combination effects during construction, operational and decommissioning phases. There are significant cumulative effects and residual cumulative effects identified with Grendon Lakes where there is a proposal for a battery energy storage system (BESS) in respect of Visual Impacts and Agricultural Circumstances only. However, **ES Chapter 8: Landscape and Visual Impact Assessment [APP-045]** effects notes that the receiving landscape has the ability to accommodate the scheme and the Grendon Lakes BESS would not result in any overall increase in the

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		Significance of Effects to the Landscape as a receptor. Other benefits of the Scheme are explained in Section 4 of this Planning Statement **[EX4/GH7.15_B]**.
Policy GS10 (Movement and Access)	A. Development proposals that would cause a severe impact on the operation of the highway in terms of capacity and congestion, or an unacceptable impact on highway safety, will be refused unless such impacts can be effectively mitigated. B. Development proposals must: 1. Provide safe and suitable access for all users, in accordance with the priorities set out by the movement hierarchy within Policy GS4. 2. Provide direct and attractive walking connections that link to the existing active travel network and connect to existing developments. 3. Maintain and, where feasible, expand the public rights of way network. 4. Design transport and movement corridors that meet the needs of people with disabilities and reduced mobility.	Regarding part A, as stated in the Transport Assessment, provided in Appendix 13.1 of the ES **[APP-150]**, as agreed with West Northamptonshire, North Northamptonshire, Milton Keynes and National Highways, construction HGVs will travel to/from the Site via agreed routes to ensure that the effects of the temporary construction phase on the highway network are minimised and safe to use A vehicle routing plan showing the agreed routing strategy for HGVs is contained with the OCTMP **[REP3-064].** Any new access points and haul roads required to facilitate the Scheme shall be installed in accordance with the Highway Authorities requirements. During construction, the appointed contractor(s) will ensure that the impacts from construction traffic on the local community (including local residents and businesses and users of the surrounding transport network) are minimised, where reasonably practicable, by implementing the measures set out in the OCTMP **[REP3-064]**.

Table 17: Emerging MK City Plan 2050 (EMKLP) - Regulation 19 (November 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	5. Wherever feasible, design transport and movement corridors that integrate sustainable urban drainage systems and enhance biodiversity. 6. Design road layouts that incorporate public transport infrastructure that integrates facilities for interchange hubs. 7. Safeguard and, where possible, enhance access to public rights of way. 8. Provide on-site parking in accordance with the parking standards set out in Annex D, for all vehicle types, unless mitigating circumstances are identified and fully evidenced. 9. Include parking areas that are well designed in terms of safety, circulation and appearance, and are designed in accordance with the movement hierarchy, prioritising movement through parking areas and parking facilities for active travel; and 10. Ensure that the future development or design of adjoining sites is not prejudiced.	As detailed in the OCTMP **[REP3-064]**, the temporary construction compounds will include parking areas. The location and size of parking provisions on-site, loading and unloading areas for plant and materials, storage areas, wheel washing facilities and construction traffic management measures will be set out in the final CTMP, which will also include a description of any laydown areas or accommodation areas. Wheel cleaning facilities will be used by vehicles prior to exiting the Order limits onto the public highway if there is mud or debris from the construction site on the vehicles. Regarding B3, the Scheme has sought to minimise disruption upon Public Rights of Way (PRoW) and Open Access Land. Where this has not been possible, ensuring minimal disruption, providing ample notice and ensuring continued passage has been of paramount importance. Where PRoW issues have arisen, the Outline Public Rights of Way Management Plan **[REP1-147]** has captured the appropriate mitigation measures.

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	C. Where development proposals would extend the grid road network, the design of the grid road must accord with an agreed design code for the sites and enable connection to the existing grid road network that may fall outside of the boundary of the site. D. Development proposals that would introduce new crossovers or seek to remove sections of the Redway will be refused unless the proposal would create an alternative route and/or create a new crossover in a manner that would priorities the active travel route and would not compromise the safety of the network. E. Major development proposals must connect to the existing Redway network, where feasible, and mitigate their impact on the existing Redway network through financial contributions. F. Private infrastructure installed within highway land (inclusive of Redways), such as telecommunications cabinets and energy storage boxes, shall appropriately screen the infrastructure from view using landscaping to mitigate their visual impact on the highway network.	

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	G. To aid delivery of the Bedford to Milton Keynes Waterway Park, development proposals within and immediately adjacent to the proposed canal route should not compromise its delivery. H. Development proposals adjacent to canals should not impede existing access to towpaths and boardwalks. Where major development proposals would provide opportunities for new public access to the canal these should be incorporated and designed for all users, including those with disabilities and reduced mobility. I. Development proposals for overnight lorry parking facilities, taking account of any local shortages, will be supported. Lorry parking facilities should not normally be located in the open countryside and should be well related to the primary road network.	
Policy CEA6 (Low and Zero Carbon Energy Provision)	**Low Carbon and Renewable Energy and Supporting Infrastructure** A. Development proposals for low-carbon and renewable energy generation will be strongly supported where it can be demonstrated that there will not be any significant negative adverse social,	The Statement of Need **[APP-556]** accompanying the DCO application sets out a detailed compelling case for why the Scheme is urgently required and at the scale proposed at a local and national level to demonstrate that the Scheme is in accordance with part A.

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	health, economic or environmental impacts. B. Development proposals for low-carbon and renewable energy generation (including community energy networks) and infrastructure needed to facilitate the supply and utilisation of low- and zero-carbon energy, including grid upgrades, energy storage and electric vehicle charging infrastructure, will be supported unless there would be: 1. Unacceptable harm on air safety from radar interference and an increased risk in incidents on approaches/departures from local airfields/airports; and/or 2. Unacceptable cross-boundary effects. **Local Energy Networks** C. Development proposals for new buildings within the same or adjacent parish as infrastructure associated with an existing or proposed heat and/or energy network, or within a heat network zone, must connect to the relevant network, unless it	The Environmental Statement **[APP-037-APP-544]** that accompanies the application has considered the impact of the Scheme and concludes that there are no significant negative social, economic or environmental impacts associated with the Scheme. Regarding part B2, Chapter 15 Glint and Glare **[APP-052]** has undertaken an assessment of potential impacts of glint and glare on surrounding road users, railway operations, dwellings, PRoW, bridleways and aviation activity. The assessment concludes that no impact is predicted from glint and glare on dwellings, roads, aviation, PRoWs, agricultural workers and other identified receptors.

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	can be demonstrated that connection is not feasible or preferable through: 1. A better alternative for reducing carbon emissions from the development can be achieved. 2. Heating and/or colling loads of the scheme do not justify a CHP connection; and/or 3. The feasibility of a connection would not be possible, or viable into account the levelised cost of heat.	
Policy CEA7 (Mitigating wider Environmental Pollution)	A. Development proposals must ensure that pollution will not have an unacceptable impact on human health, groundwater, general amenity, biodiversity, or the wider natural environment. **Contaminated Land and Soil Pollution** B. Proposals for residential and non-residential development must demonstrate that they would not be at risk from any ground, groundwater or gas contamination with regard to: 1. Land previously used from industrial, commercial or utilities purposes.	With respect to part A, the application has demonstrated that the Scheme does not have unacceptable impacts due to pollution within the follow documents: • ES Chapter 9: Ecology and Biodiversity **[REP1-033]**; • ES Chapter 14: Noise and Vibration **[APP-051]**; • ES Chapter 18: Human Health **[APP-055]**; • ES Chapter 24: Other Environmental Matters **[REP1-027]**. With respect to parts B and C, regarding contamination land and soil pollution, ES

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	2. Land which is at risk of contamination or impacted by adjacent contamination; and 3. Land where the proposed use is vulnerable to the presence of contamination. C. Development proposals which risk contributing to soil and/or water pollution must demonstrate how this risk will be avoided or mitigated to an acceptable level. Soils must also be managed appropriately to maintain soil structure, function, and chemical and organic content. **Air Quality and Odour** D. Development proposals that would result in unacceptable impacts to human health and/or the natural environment through air pollution, or that would prejudice compliance with national air quality objectives, will be refused. E. Major development proposals must demonstrate how prevailing air quality, accounting for all potential sources of air pollution, and the potential impacts upon air quality from the proposal have been assessed. They must also show how acceptable air quality standards will be	Chapter 22: Ground Conditions and Contamination **[REP1-025]** confirms that a Construction Environmental Management Plan (CEMP) and Decommissioning Environmental Management Plan (DEMP) will be required for the construction and decommissioning phases which are secured through requirements in the DCO, which will be based on the OCEMP **[REP1-131]**, OOEMP **[EX4/GH7.2_B]** and ODS **[REP1-135]**. The plans will describe the construction and decommissioning related mitigation measures and good practices to ensure any environmental impacts in terms of land and groundwater contamination are minimal. Therefore, the Scheme is compliant with Parts B and C of the policy. With respect to parts D-F, regarding Air Quality, ES Chapter 16: Air Quality **[APP-052]** sets out the embedded mitigation measures which conclude that the air quality effects are assessed to be negligible. The impacts are considered acceptable on the amenity of sensitive neighbouring residents. It concludes that the Scheme will not result in adverse impacts upon air quality from odour, fumes, smoke dust and other sources.

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	maintained through appropriate avoidance and mitigation. F. Minor development proposals will also be required to address the considerations outlined in Part E, if any of the following apply: 1. Due to the nature of the proposal, and through in-combination effects, the developments risks creating unacceptable impacts to human health and/or the natural environment through air pollution. 2. The site is within an Air Quality Management Area. 3. The site is within 50m of the Strategic Road Network, Major Road Network, Grid Roads or A422. 4. The site is within proximity to a source of air pollution which could present a significant risk to human health; or 5. The type of development would mean its occupiers would be more vulnerable to air pollution. G. Development proposals must address any impact upon odour levels, or their sensitivity to prevailing sources and levels of odour. An odour assessment will be	Therefore, the Scheme is in accordance with Parts D-F. Noise generation arising from the Scheme have been identified within ES Chapter 14: Noise and Vibration **[APP-051]**. Through embedded mitigation measures (detailed within Section 14.7 of ES Chapter 14: Noise and Vibration **[APP-051]**), no significant residual effects are predicted during construction, operation and decommissioning of the Scheme on all receptors. With regard to parts H-and I, vibration levels from activities (i.e. on-site works and construction HGV traffic) are anticipated to be below SOAEL and as such is equivalent to low magnitude of impact. This is equivalent to a moderate effect which is not considered to be significant. Typical decommissioning noise levels across the overall duration of the decommissioning programme will likely be limited to a low magnitude impact. For receptors of high sensitivity this equates to a moderate adverse effect which is not considered to be significant. Artificial lighting will be required during construction and decommissioning in areas where natural lighting is unable to reach (sheltered/confined areas), and during core

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	required for residential development of a Water Recycling Centre to demonstrate that odours from the site would not adversely affect residential amenity. **Noise and Vibration** H. A Noise and Vibration Impact Assessment will be required for development proposals that have the potential to cause disturbance to people and/or the natural environment due to noise and/or vibration, as well as for proposals that are sensitive to such impacts. I. Development that would result in or be exposed to, noise pollution and/or vibration that causes significant adverse impact on residential amenity, human health, the natural environment and/or the tranquillity of the countryside will be refused. Planning permission will only be granted in such circumstances where the need for, and benefits of, the development clearly outweigh the harm and where all feasible measures to avoid and mitigate that harm have been fully implemented. J. Development proposals within 100m of the existing Strategic Road Network,	working hours within winter months. All construction lighting will be deployed in accordance with the recommendations set out in the OCEMP **[REP1-131]** and will minimise potential for light spillage outside the Scheme and Cable Corridor, particularly towards houses, traffic and ecological habitats. With regard to parts K-L, details of operational lighting are set out by Chapter 4: Scheme Description **[REP1-031]**. This explains that no part of the Scheme will be continuously lit. Manually operated, and motion detection lighting will be utilised for operational and security purposes around electrical infrastructure. Lighting will be directed downward and away from boundaries. No visible lighting will be utilised at the site perimeter fence, aside from the site entrance points. With regard to part M, ES Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]** confirms that, in the highly unlikely event of a fire, isolation values will close automatically, thereby reducing the risk on the water quality.

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	Major Road Network, Grid Roads, or the A422, including proposed additions, or railways must include appropriate mitigation measures to protect existing and future occupiers from noise and vibration impacts. **Light Pollution** K. Development proposals that include external lighting schemes will be supported where it can be demonstrated through a Lighting Assessment that all the following criteria are met: 1. The lighting scheme is the minimum required for security and operational purposes. 2. Glare and light spillage are minimised; 3. The amenity of residential areas is not adversely impacted; 4. There is no unacceptable impact on the character, beauty, openness, tranquillity, dark landscapes, or enjoyment of the night sky in the countryside; 5. The visual character of historic buildings and conservation areas is not adversely impacted.	

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	6. Ther is no dazzling or distraction of drivers using nearby roads; and 7. There are no unacceptable adverse impacts on species, habitats, or the wider natural environment L. Where appropriate, the brightness and/or hours of illumination will be controlled by condition. **Water Quality** M. Major development proposals must demonstrate how potential impacts on water quality will be mitigated. If identified by Natural England as a material consideration in the authority area, proposals must also demonstrate how nutrient neutrality would be achieved.	
Policy CEA9 (Biodiversity and Habitats Network)	A. Development proposals that provide a higher than 10% net gain in biodiversity and those that provide for long-term management and maintenance for more than 30 years will be strongly supported provided the proposed habitat types/species selected are appropriately integrated with the wider landscape proposals and suitable to the end use of the development.	Regarding part A, the Scheme will provide a higher than 10% BNG as detailed below. Regarding point B2., the assessment of Ecological impacts is set out in ES Chapter 9: Ecology and Biodiversity **[REP1-033]**. Section 6.7 of the Planning Statement **[EX4/GH7.15_B]** concludes that with the embedded mitigation measures proposed which are wide-ranging and respond directly to the type of species and habitats that are affected, the Scheme is expected to have an overall significant benefit.

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	B. Development proposals that provide biodiversity enhancements not included as part of the metric will be strongly supported. C. Development proposals should avoid the loss of habitat present on site. If loss of habitat is unavoidable then proposals must include: 1. The creation or enhancement of habitat on-site 2. The creation of habitat off-site through creation or purchase of units; and/or 3. Evidenced purchase of statutory credits where the creation of habitat off-site is not possible.	A Biodiversity Net Gain (BNG) Assessment, using Defra's Metric 4.0 has been provided within the DCO application **[REP1-043]**. This sets out the significant net gains in biodiversity that the Scheme will provide onsite. The Scheme has therefore taken advantage of opportunities to conserve and enhance biodiversity.
Policy CEA10 (Protection and Enhancement of Environmental Infrastructure Network, Priority Species and Priority Habitats)	**Protection and enhancement of Nature, Green and Blue Infrastructure Network** A. Development proposals must protect and enhance the Nature, Green and Blue Infrastructure network in line with Milton Keynes; Nature, Green and Blue Infrastructure Strategy by conserving and enhancing on-site biodiversity and habitat networks within and adjacent to the site.	Regarding part A, the Scheme seeks to protect and enhance the onsite biodiversity and habitat networks, providing significant biodiversity net gain as detailed in the Biodiversity Net Gain Assessment **[REP1-043]**. **A Habitat Regulations Assessment REP1-153]** has been prepared in consultation with Natural England. It confirms that the Scheme does not involve any requirement of physical resources from the SPA and will not result in any direct harm or alteration of habitats as the Order Limits are wholly separate to the SPA. As such,

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	B. Development proposals which would likely cause harm to the nature conservation or geological interest of internationally important sites (Ramsar sites, Special Areas of Conservation, Special Protection Areas and Functionally Linked Land associated with and within 10km of the Upper Nene Valley Gravel Pit SPA/Ramsar) will not be permitted unless: 1. There is no suitable alternative site to accommodate the development; 2. All reasonable possibilities for mitigation have been considered.; 3. There are imperative reasons for overriding public interest; and 4. Compensatory provision in line with mitigation hierarchy will be secured. C. Development proposals which would likely cause harm to the biodiversity or geological conservation value of a site of authority-wide or local importance, will only be permitted where: 1. There is no suitable alternative site to accommodate the development.	there is no risk of likely significant effects from this pathway. Regarding part C, the assessment in Section 9.9 of Chapter 9: Ecology and Biodiversity of the ES **[REP1-033]** considers the impacts of the Scheme on designated sites and concludes that there are no significant effects as a result of operation of the Scheme on any SSSIs. The Scheme therefore accords with this policy. Regarding part D, the assessment in Section 9.9 of Chapter 9: Ecology and Biodiversity of the ES **[REP1-033]** considers the likely significant impacts of the Scheme on designated sites and concludes that there are no significant effects as a result of the operation of the Scheme on any sites of regional and local biodiversity and geological interest. The Scheme, therefore, accords with this policy. The ES has considered the effects on designated sites of ecological and geological conservation importance. This is captured within ES Chapter 9: Ecology and Biodiversity **[REP1-033]** and ES Chapter 22: Ground Conditions and Contamination **[REP1-025]**. Following the application of mitigation measures set out in Sections 9.8 of Chapter 9: Ecology and Biodiversity **[REP1-033]**, no significant adverse effects have been identified during the

Table 17: Emerging MK City Plan 2050 (EMKLP) - Regulation 19 (November 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	2. The benefits of the development, at this site, clearly outweigh the adverse impact on the site. 3. The benefits of development clearly broader impacts on the national network of Sites of Special Scientific Interest. 4. All reasonable possibilities for mitigation have been considered; and 5. Compensatory provision in line with the mitigation hierarchy will be secured. D. Development proposals which would likely cause harm to the biodiversity or geological conservation value of a site of authority-wide or local importance, will only be permitted where: 1. The local development needs significantly outweigh the biodiversity or geological conservation value of the site; 2. All reasonable possibilities for mitigation have been considered; and 3. Compensatory provision in line with mitigation hierarchy will be secured.	construction, operation or decommissioning of the Scheme and no residual effects are anticipated. Any mitigation measures undertaken at the point of decommissioning aimed at maintaining ecological value of the Sites should take account of changes in ecological objectives that have occurred over the operational phase. Regarding part E, the embedded mitigation is described in section 9.8 of Chapter 9: Ecology and Biodiversity **[REP1-033]** and includes a comprehensive suite of measures to both limit potential impact but also improve quality of habitats on Site, which support and protect protected species, such as bats and nesting birds. With respect to part F, the majority of in-combination effects likely to arise from the Scheme are considered to be beneficial. Key measures which are likely to result in beneficial in-combination effects on a number of ecological receptors include the following: • The cessation of intensive arable land-use and herbicide/fertiliser inputs associated with an arable system; • The reversion of arable land to permanent, species-rich grassland;

Table 17: Emerging MK City Plan 2050 (EMKLP) - Regulation 19 (November 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	Functionally Linked Land E. Development proposals within the Upper Nene Valley Gravel Pits Special Protection Area and Ramsar 10km Zone of Influence for functionally linked land, must identify the impact(s) and demonstrate site-specific avoidance and/or mitigation to satisfy the Habitats Regulations. Development proposals greater than one hectare within the 10km zone or likely to have a significant effect on the Upper Nene Valley Gravel Pits SPA and Ramsar conservation objectives must be accompanied by a Habitats Regulation Assessment that assesses the impact on functionally linked land and how site-specific adverse effects can be avoided and/or mitigated. Development proposals that could potentially comprise functionally linked land associated with the Upper Nene Valley Gravel Pits SPA and Ramsar will need to undertake overwintering bird surveys early in the planning process ahead of submitting an application. F. Where an adverse impact on site integrity at the Upper Nene Valley Gravel Pits	• The retention, creation and enhancement of other ecologically valuable habitats across large parts of the Order Limits; and Sensitive ongoing management of these habitats throughout the operational phase, as prescribed and secured by the OLEMP **[REP1-137]**. With respect to Part I, the Scheme will result in the Order Limits being developed across 65% BMV land with the remainder of the Scheme being built across Non-BMV land as set out in Section 6.18 of the Planning Statement **[EX4/GH7.15_B]**. Despite this percentage of BMV land, the Site Selection Assessment **[REP1-038]** demonstrates that the use of any other land in this area for a comparably sized scheme would likely result in a similar impact on agricultural land.

Table 17: Emerging MK City Plan 2050 (EMKLP) - Regulation 19 (November 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	SPA and Ramsar is identified, development will only be permitted where it satisfies the requirements of part B of this policy. **Protection of Priority Species and Priority Habitats** G. Development will not be permitted unless it has been demonstrated that it will not result in a negative impact upon protected species and priority habitats. H. Development proposals, on sites which contain priority species or habitats, must promote priority species preservation, restoration, expansion and/or re-creation. **Protection of Best and Most Versatile Land** I. Development proposals on greenfield sites for 300 homes or more must consider the economic and other benefits of best and most versatile agricultural land through appropriate surveys and assessments. Where such proposals involve the loss of agricultural land, areas	

Table 17: Emerging MK City Plan 2050 (EMKLP) - Regulation 19 (November 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	of poorer quality land (grades 3b, 4 and 5 of the Agricultural Land Classification) should be used in preference to higher quality land (grades 1, 2, and 3a of the Agricultural Land Classification), unless other material planning considerations would outweigh the loss.	
Policy CEA12 (Conserving and Enhancing Landscape Character/Special Landscape Areas)	**Conserving and Enhancing Landscape Character** A. Development proposals must demonstrate that they conserve and, where possible, enhance the landscape character through sensitive design, mitigation and enhancement measures. Proposals should consider: 1. The key natural and man-made features that contribute towards the landscape character and its quality; 2. The historic layout and setting of villages and hamlets; 3. Important views, including local landmarks; and 4. The tranquillity of the area and the need to protect against intrusion from light pollution, noise and motion. B. Where a site-specific landscape and visual impact assessment is required as	Regarding part A, the Design Approach Document **[APP-560]** confirms that the Scheme's impact on landscape has been considered throughout the design process. In addition, although there is acknowledgement that the Scheme causes adverse effects on the landscape, the Scheme is also providing significant landscape mitigation planting: • 14.45ha of green corridor and woodland planting. • 12.81ha enhanced Riparian Native Planting. • 43.13km of hedgerow reinforcement and reinforced roadside vegetation. • 15.61km of proposed hedgerow. • Six proposed ponds and wader scrapes; and • 1,079.53ha of groundcover.

Table 17: Emerging MK City Plan 2050 (EMKLP) - Regulation 19 (November 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	part of a planning application, this must be prepared in accordance with the standard method set out in Landscape Institute guidance. **Special Landscape Areas** C. Development affecting Special Landscape Areas will only be permitted where they: 1. Conserve and, where possible, enhance the special character and key landscape qualities of the area. 2. Protect important views, features, landmarks and historic layout and setting of villages and hamlets. 3. Preserve the tranquillity of the area and the need to protect against intrusion from light pollution, noise and motion and 4. Maintain and, where feasible, improve public access to the countryside. D. Development proposals must include appropriate measures to mitigation landscape and visual impacts. Landscape and Visual Impact Assessments shall consider the Milton Keynes Landscape Character Assessment, the Statements of Significance for each of the Special	As well as providing significant biodiversity net gains, at Year 15 of operation and at decommissioning, the Scheme will cause significant moderate beneficial effects for the landscape fabric. Regarding part B, the LVIA methodology **[APP-079]** confirms that the landscape assessment has been undertaken in line with the latest Landscape Institute Guidance. Regarding parts C-D, as detailed within ES Chapter 3 The Development Site **[REP1-029]**, Site G is located in the proposed extension of the Ouse Valley Special Landscape Area, set out in Milton Keynes emerging Local Plan. ES Chapter 8: Landscape and Visual Impact **[APP-045]** has considered the impact of the Scheme on the Special Landscape Area. Although, there will be an impact on the Area, Milton Keynes's emerging Local Plan has also put forward this area as areas of search for wind turbines and solar farms. Therefore, the Scheme is considered to be compliant with Milton Keynes's emerging Local Plan. Therefore, the Scheme is in accordance with policy.

Table 17: Emerging MK City Plan 2050 (EMKLP) - Regulation 19 (November 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	Landscape Areas, and any other relevant landscape and visual assessments or studies.	
Policy CEA13 (Sustainable Drainage Systems (SuDS) and integrated Flood Risk Management)	A. Development proposals which are likely to result in a measurable change to the drainage characteristics of a site, must adopt an integrated approach to managing flood risk and incorporating SuDS and a surface water management strategy at a scale that is proportionate to the size and nature of the development. These will be delivered in early phases of development as necessary. Proposals must meet the following requirements: 1. Flood risk management and SuDS systems are provided at a strategic scale, where possible, with SuDS features of different scales performing in an integrated manner 2. SuDS and fluvial flood risk reduction features are appropriately integrated into the design and layout of the development. 3. Above ground attenuation is provided wherever feasible. Where this is not feasible and below ground attenuation is being proposed, an evidenced justification must be provided.	ES Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]** sets out how mitigation and management of flood risk has been incorporated into the design of the Scheme so that the risk of flooding will not be increased, including through the use of SuDS. Drainage strategies, to be substantially in accordance with the drainage strategies which form part of the Flood Risk Assessments in ES Appendices 10.1 to 10.11 **[APP-097 to APP-107]**, are secured through the draft DCO **[REP3-024]**. These drainage strategies will be in compliance with the requirements of part B of this policy. Consideration has been given to incorporating nature-based climate change adaption into Scheme, and proposals for SuDS have been included, as outlined within the OOEMP **[EX4/GH7.2_B]** and the Landscape and Ecology Mitigation Plans **[REP3-042, REP3-044, APP-209, REP3-046, APP-211, REP3-048, REP3-050, APP-214, APP-215, REP3-052, APP-217, REP3-054, APP-219].**

Table 17: Emerging MK City Plan 2050 (EMKLP) - Regulation 19 (November 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	4. SuDS are designed as multi-purpose green infrastructure, to maximise complementary environmental, biodiversity, social and amenity value. 5. The use of land to provide flood storage capacity must protect floodplain habitats and not conflict with required amenity and recreation provision for the site. 6. SuDS are designed for climate change and the potential impact it may have over the lifetime of the proposed development. 7. Proposals within the Critical Drainage Catchments, as identified in the appendices of the SFRA, must investigate the potential to reduce or mitigate existing flood risk in the surrounding area. 8. Provide details of future management, maintenance and adoption of the SuDS and flood risk management systems prior to the granting of planning permission, outlining how they will be funded and function effectively over the lifespan of the development.	

Table 17: Emerging MK City Plan 2050 (EMKLP) - Regulation 19 (November 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	9. Where feasible, proposals explore opportunities for de-culverting watercourses and the creation of wetlands, wet grasslands and/or wet woodlands and restore natural river flows and floodplains. B. Development proposals must demonstrate that water supply, foul sewerage and sewage treatment capacity is available or can be made available in time to serve the development. Suitable access must be safeguarded for the maintenance of water supply and foul water infrastructure.	
Policy CEA14 (Protecting and enhancing watercourses)	A. To ensure an adequate undeveloped buffer zone, development proposals must maintain a minimum set back of eight metres from any main river and at least nine metres from all other ordinary watercourses, or a distance otherwise agreed with the Environment Agency, Lead Local Flood Authority, or Internal Drainage Board as the appropriate authority. The provided buffer strip should not form part of private gardens. B. Development proposals adjacent to or containing a watercourse should protect and enhance the watercourse's	Mitigation measures, including buffering from rivers and watercourses and the avoidance of restrictions on drainage routes, are set out in ES Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]**. With respect to part A, ES Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]** confirms that a minimum 8m buffer has been maintained from all main rivers in line with EA guidance. This buffer has been increased to respond to 9m from other ordinary watercourses, where required by local plan policy.

Table 17: Emerging MK City Plan 2050 (EMKLP) - Regulation 19 (November 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	biodiversity, ecological connectivity, marginal vegetation and aquatic and riparian vegetation as well as their associated species. C. Development that would prevent the future de-culverting of watercourses should be avoided. D. Development proposals must not negatively impact on the natural functioning of main rivers, ordinary watercourse or wet/dry balancing lakes. Culverting of open channels should be avoided unless it is essential for access purposes.	Regarding Part C, no part of the Scheme will restrict future de-culverting of waterways. Part D, ES Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]** confirms that the Scheme has been designed so as not to adversely affect the natural functional of main rivers. The Scheme has been designed to utilise existing access points and culverts where possible. It is anticipated that the Scheme will require the construction of one new culvert in site Green Hill F.
Policy CEA15 (Managing Flood Risk)	**Consideration of Flood Risk in Development Proposals** A. Development proposals must not detrimentally impact upon existing or proposed flood defences, structures and systems. B. Development proposals shall reinstate the rate of surface water runoff from brownfield sites to greenfield runoff rates. Where this is not practicable, a relaxation factor of no grater than five times the target 50% and 1% greenfield runoff rate shall be applied.	Regarding Part A, ES Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]** sets out how the development does not affect flood defences. With respect to Part B, no brownfield sites are included within the Scheme. Regarding Part C, the FRAs provided in ES Appendices 10.1 to 10.11 **[APP-098 to APP-107, REP1-053, REP1-055]** consider Flood Zone 3b as appropriate.

Table 17: Emerging MK City Plan 2050 (EMKLP) - Regulation 19 (November 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	C. Site Specific Flood Risk Assessments must define the extents of Flood Zone 3b where no detailed modelling exists and this must include all relevant flood risk scenarios from all sources. Where detailed modelling is available, the Flood Risk Assessment must ensure that this modelling is fit for purpose for the proposal. D. Development proposals must not increase surface runoff from a site or contribute to cumulative effects. E. Development proposals on land that has not been subject to a plan-making Sequential Test will be required to undertake a flood risk sequential test using the Council's latest published Strategic Flood Risk Assessment, and in accordance with the NPPF and PPG. Where development proposals are on land which has been subject to a plan-making Sequential Test but evidence on flood risk has significantly changed or the nature of the proposal differs significantly changed or the nature of the proposal differs significantly from the nature of the allocation, a flood risk sequential test will also be required using the Council's latest published Strategic Flood Risk	Regarding Part D, the FRAs provided in ES Appendices 10.1 to 10.11 **[APP-098 to APP-107, REP1-053, REP1-055]** demonstrate that surface water runoff is not increased. With respect to Part E, a Sequential Test and an Exception Test have been provided as Appendix B of the Planning Statement **[EX4/GH7.15_B]**. The Applicant considers that the Scheme passes the Sequential Test requirements. Given that the Scheme falls within areas of Flood Zone 3, the Scheme has been subject to the Exception Test. It has been concluded that the Scheme meets the requirements of the Exception Test. Regarding Part G, ES Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]** sets out how the development adequately mitigates flood risk. No contributions are required. With respect to Part H, FRAs are provided in ES Appendices 10.1 to 10.11 **[APP-098 to APP-107, REP1-053, REP1-055]**.

Table 17: Emerging MK City Plan 2050 (EMKLP) - Regulation 19 (November 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	Assessment. Where the Sequential Test is passed, the Exception Test shall be applied as and when required by the NPPF and PPG. F. Where the risk of flooding from rivers could be reduced by flood risk management measures, or where the extent of protection is below the required standard (either now or in the future), development proposals will be required to make provision for improvements. Where protection is not of the required standard, this should not be relied upon for safety until satisfactory improvements have been made. **Flood Risk Assessments** G. A Flood Risk Assessment must be submitted for development proposals that meet any of the following criteria: 1. Are in Flood Zone 2 or 3; 2. Are more than one hectare within Flood Zone 1. 3. Are less than one hectare in Flood Zone 1 and include a change of use	

Table 17: Emerging MK City Plan 2050 (EMKLP) - Regulation 19 (November 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	to a more vulnerable use where they could be affected by sources of flooding other than rivers. 4. All sites as being at high risk from surface water flooding, or which are located within a Critical Drainage Catchment as identified in Appendix P of the Strategic Flood Risk Assessment, will be required to provide a Flood Risk Assessment that demonstrates that the development will not increase the flood risk to the Critical Drainage Catchment, and where possible, will provide an improvement to the existing situation. 5. Are in a Critical Drainage Area (CDA); or 6. Land identified in a Strategic Flood Risk Assessment as being at increased risk of flooding in the future.	
Policy ECP5 (Supporting a Diverse Rural Economy)	A. Proposals for a new and expanded employment uses located within the Open Countryside and rural settlements will be supported where they relate to the: 1. Expansion of an existing business; 2. Diversification of rural businesses which require a rural location; or	The temporary employment generated by the Scheme's construction is assessed to be approximately 464 direct FTE jobs per annum as set out within Section 17.5.2 of **ES** Chapter 17: SETR **[APP-054]**. During its operational lifetime, the Scheme is anticipated to generate a modest quantum of labour, related to ongoing operational

Table 17: Emerging MK City Plan 2050 (EMKLP) - Regulation 19 (November 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	3. Tourism and countryside recreation. And 4. They involve the conversion or re-use of an existing building; or 1. Where new or extended buildings are required to support the employment use, these must be of a sale and design which responds positively to the character of the surrounding countryside or existing rural settlement and, where practicable, are located in close proximity to existing buildings. The use of previously developed land, and sites that are physically well-related to existing settlements, will be supported where suitable opportunities exist.	management and site management. It is projected that the Scheme will require a gross 15 FTE direct employees per annum as set out within Section 17.5.19 of ES Chapter 17**:** SETR **[APP-054]**. A Skills, Supply Chain and Employment Plan will be prepared prior to the commencement of construction. This will set out measures that the Applicant will implement to advertise and promote employment and training opportunities associated with the Scheme in construction and operation locally. It will be secured through a requirement included in the DCO for the Scheme. The **OSSCEP [APP-552]** forms the basis for this.
Policy HE1 (Heritage)	A. Development proposals that would affect heritage assets must be accompanied by a heritage assessment. Heritage assessments should: 1. Assess and describe the significance of the heritage assets affected, identifying those elements that contribute to that significance and, where appropriate, those that do not. The level of detail shall be proportionate to the asset's	Chapter 12: Cultural Heritage of the ES **[APP-049]** provides a comprehensive assessment of the likely effects of the Scheme on heritage assets above and below ground. This includes a description of the significance of the heritage assets and the contribution of their setting to their significance, and potential mitigation measures to minimise any impact. ES Chapter 12 Cultural Heritage **[APP-049]** confirms that there are no listed buildings within the Order limits. A total of 413 Listed Buildings

Table 17: Emerging MK City Plan 2050 (EMKLP) - Regulation 19 (November 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	importance and no more than is sufficient to understand the potential impact of proposals on their significance. 2. Be objective and of an analytical and interpretive nature rather than simply provide a description of the assets and the proposed works. Where technical knowledge and expertise is required to fulfil this, applicants should engage a qualified heritage professional to undertake the assessment. 3. Provide a sound justification for the works, based on the economic, social and environmental benefits delivered by the scheme. 4. Explain how the scheme has taken account of the significance of the assets in its scope, design and detail, in order to minimise or avoid harm to the heritage assets affected; and 5. Assess the nature and extent of any harm or public benefit arising from the scheme, where harm is caused by the proposal, explain why such harm is unavoidable.	of varying grade were identified within the Study Area, of which 691 Listed Buildings were identified where there is a potential for impacts. Appendix 12.9 of ES Chapter 12 Cultural Heritage **[APP-049]** indicates that most of the identified impacts on heritage assets would be not significant in EIA terms with effects mostly ranging between Neutral and Minor/Moderate Adverse. As explained in the SoN **[APP-556]**, the Proposed Development has the potential to deliver significant amounts of low-carbon electricity and make a material contribution to help meet the UK's commitments to decrease carbon emissions and reach net zero by 2050. Failure to deliver infrastructure projects that deliver low carbon electricity would, in effect, materially damage the UKs prospects of meeting its target to address climate change.

Table 17: Emerging MK City Plan 2050 (EMKLP) - Regulation 19 (November 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	B. Development proposals for the conversion of listed buildings to an alternative use, or that involve structural works to their historic fabric, must be accompanied by a structural engineer's report. In the case of conversion, the report should demonstrate that the building is capable of conversion and set out the structural works required to achieve the new use. In all cases, the report must demonstrate how the structural works proposed have been designed to minimise the impact upon the significance of the asset. C. Development proposals for conversion or subdivision of a listed building must include the full scope of works required. D. Development proposals that result in the loss of a non-designated heritage asset, including those on the New Town Heritage Register or local list, must be accompanied by evidence to demonstrate that all feasible solutions to avoid and minimise its loss have been fully evaluated. Where New Town Heritage Register assets meet the *Design Quality or Group or Townscape Quality* criteria, the replacement scheme must be of demonstrably equal or greater	

Table 17: Emerging MK City Plan 2050 (EMKLP) - Regulation 19 (November 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	architectural quality than the asset to be lost. E. Where enabling development is proposed to secure the future of a heritage asset, accurate and robust evidence to demonstrate that a 'conservation deficit' exists must be provided. F. Development proposals containing heritage assets that may be harmed by a long delivery period (such as large housing schemes) must set out a strategy for their preservation in the interim period. This should include information about: 1. Occupation of the building (where possible), initial works/repairs, security measures and regular condition monitoring. 2. The repair and restoration of the heritage assets, how this will be tied to early phases of the wider development. 3. Preserving their setting so that they provide a historical focal point, preserving established local character; and 4. Avoiding a layout and design that causes an adverse impact on the	

Table 17: Emerging MK City Plan 2050 (EMKLP) - Regulation 19 (November 2025)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	future viability of the heritage assets, particularly in respect of access and retained land. G. Where development is proposed on a site with the potential to include heritage assets of archaeological interest, applications must be accompanied by an appropriate desk-based assessment, and where necessary, a field evaluation.	

3.9 Milton Keynes Minerals Local Plan

Table 18: Milton Keynes Minerals Local Plan (Adopted 2017) (MKMLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Policy 18 (Mineral Safeguarding and Consultation Area)	Mineral resources of local and national importance within Milton Keynes include sand and gravel and the White and Blisworth Limestone formations. These resources will be safeguarded from unnecessary sterilisation by other development through the designation of Mineral Safeguarding Areas. Planning permission will not be granted for non-mineral development that would lead to the unnecessary sterilisation of mineral resources within a Minerals Safeguarding Area unless it can be demonstrated that:	As detailed within ES: Chapter 11 Minerals **[APP-048]**, the Sites potentially impact a sand and gravel allocation known as M2 Strixton – Bozeat as well as two existing quarry areas and the mineral consultation areas associated with existing quarries and allocations. The Scheme also falls within the Northamptonshire Sand and Gravel Mineral Safeguarding Area. Given the unintrusive nature of the Scheme, the Scheme will not result in the permanent loss of the ability to extract minerals from the Mineral Safeguarding Areas. However, none of the Scheme is located within a sand and gravel

Table 18: Milton Keynes Minerals Local Plan (Adopted 2017) (MKMLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	• The mineral concerned is not of economic value or evidence confirms the absence of mineral resources, the proposed development is temporary or of a nature that would not sterlise the mineral resource or hinder future extraction. • The proposed development is temporary and would not sterlise the mineral resource or hinder future extraction. • Prior extraction can occur where practicable and environmentally feasible and within a reasonable timescale. • There is an over-riding need for the development, or • The development is exempt. In determining whether prior extraction is feasible an assessment of the mineral resource including detailed site investigations should be undertaken to identify the quality, quantity and extent of the resource, the economic viability of prior extraction and the proportion of the mineral to be used on-site and saleable aggregate. The assessment should also take account of the size, nature and need for the (non-minerals) development as well as the proposed phasing of operations	allocations in the current Mineral and Waste Local Plans, so will not prejudice existing sites coming forward. This is explained in greater detail in the Chapter 11 Minerals **[APP-048]**. The Scheme will be decommissioned after 60 years of operation, and any impacts caused by the Scheme related to land use are considered reversible and temporary. The minerals within the Order limits will not be permanently sterilised, and post-decommissioning, the land could be worked for minerals. The Planning Statement **[EX4/GH7.15_B]** sets out the need for the Scheme in terms of providing self-sufficient, renewable energy generation that will contribute towards affordable household electricity bills, In December 2024, the UK Government published the Clean Power 2030 Action Plan which outlined the UK's strategy to achieve a clean power by 2030. The plan emphasizes the shift to '*clean, homegrown energy'* to reduce the dependence on fossil fuels and enhance energy security. Solar generation is a critical element of the plan to decarbonise the UK electricity sector with urgency and is already a leading low-cost generation technology in the UK. The national need for solar generation is urgent and the capacity required is significantly greater than

Table 18: Milton Keynes Minerals Local Plan (Adopted 2017) (MKMLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	and constructions of the non-mineral development. In the event that the non-mineral development is delayed or not implemented, the site must be restored to a stable landform and appropriate after-use.	the capacity of projects currently understood to be in development.
Policy 19 (Safeguarding of Minerals-Related Development and Associated Infrastructure)	Proposals for non-minerals development adjacent or in close proximity to committed or allocated minerals sites, associated infrastructure and other forms of minerals-related development, should only be permitted where it can be shown that the proposed development will not impact on the current or future operations of the minerals-related development and will not result in unacceptable adverse impacts affecting the proposed development. Proposals for development that are considered to be incompatible with minerals-related development will be required to undertake a site-specific assessment to determine if there are any potentially adverse impacts and identify mitigation measures that will need to be put in place to avoid and/or reduce impacts to an acceptable level. Separation areas will be used to help prevent the encroachment of incompatible	As detailed within ES: Chapter 11 Minerals **[APP-048]**, the Sites potentially impact a sand and gravel allocation known as M2 Strixton – Bozeat as well as two existing quarry areas and the mineral consultation areas associated with existing quarries and allocations. The Scheme also falls within the Northamptonshire Sand and Gravel Mineral Safeguarding Area. Given the unintrusive nature of the Scheme, it is proposed that no adverse harm will occur upon these Safeguarding Areas. The Scheme will be decommissioned after 60 years of operation, and any impacts caused by the Scheme related to land use are considered reversible and temporary. The minerals within the Order limits will not be permanently sterilised, and post-decommissioning, the land could be worked for minerals.

Table 18: Milton Keynes Minerals Local Plan (Adopted 2017) (MKMLP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	development on minerals-related development.	

3.10 Milton Keynes Waste Development Plan

Table 19: Milton Keynes Waste Development Plan Document 2007-2026 (Adopted 2008) (MKWDP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Policy WCS2 (Provision for Waste Management Capacity)	To meet regional and local waste targets and arisings to enable sufficient waste management capacity to 2026, a strategic site for a waste management facility for final treatment, and other recycling composting and transfer activities will be provided for. Priority for waste management facilities will be given to sites in existing employment areas and existing waste management sites. Proposals in other areas will be permitted if it can be demonstrated that: a) They serve an identified local need which cannot be met by existing facilities, and: b) No suitable sites are available in employment areas close to the source of waste.	The details of the provision for waste management during the construction and operational phases of the Scheme are set out in the OCEMP **[REP1-131]**, OOEMP **[EX4/GH7.2_B]** and ODS **[REP1-135]** but the final details will be established in the final CEMP, OCEMP and DS.

4 Neighbourhood Planning Policy Accordance Tables

4.1 Earls Barton Neighbourhood Plan

Table 20: Earls Barton Neighbourhood Plan 2011-2031 (Adopted 2016) (EBNP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
EB.D1	Any development proposals should be of a high standard of design and layout in keeping with local character and should seek to utilise sustainable building techniques and materials wherever practical. New development proposals will be supported in the event that they achieve all of the following: • protect, conserve and enhance the natural, built and historic environment, including key landscapes, natural resources, areas of natural habitat or nature conservation value and both designated and non-designated heritage assets. • demonstrably protect, conserve or enhance the setting and views of All Saints Church and its Saxon tower as well as other designated and non-designated heritage assets; • minimise the loss of trees and hedgerows; • provide for sustainable drainage solutions designed in accordance with the National Standards for Sustainable Drainage and deemed acceptable by the relevant SuDS Approval Body (SAB) before development	As detailed in Section 6.3 of the Planning Statement **[EX4/GH7.15_B]**, the Scheme has been subject to a detailed and sensitive iterative design process. This has taken account of the context and features of the land within the Order limits, nearby sensitive receptors and assets, information emerging from environmental surveys, feedback from stakeholders, and opportunities and constraints in order to develop a good design that balances the need maximise the energy generation capacity of the Scheme, with the avoidance and mitigation of impacts, and provision of environmental and other enhancements, where practicable. The design process and basis of design decisions taken are described in the Chapter 5: Alternatives and Design Evolution of the ES **[APP-042]** and the Design Approach Document **[APP-560]**. The historic environment impacts of the Scheme and the impacts associated significance in relation to above, at, and below ground level during construction, operation and decommissioning has been explored within Section 12.8 of the ES, Chapter 12: Cultural Heritage **[APP-049].**

Table 20: Earls Barton Neighbourhood Plan 2011-2031 (Adopted 2016) (EBNP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	commences and preferably, and where reasonable, before permission is granted; • perform well against all relevant locally adopted design guidance, including all of the criteria of the North Northamptonshire Sustainable Design Supplementary Planning Document.	The Archaeological Mitigation WSI **[APP-147]** ensures the Scheme complies with this paragraph. The Scheme has been designed to minimise the loss of trees and hedgerows. Consideration has been given to incorporating nature-based climate change adaption into Scheme, and proposals for SuDS have been included, as outlined within the OOEMP **[EX4/GH7.2_B]** and the Landscape and Ecology Mitigation Plans **[REP3-042, REP3-044, APP-209, REP3-046, APP-211, REP3-048, REP3-050, APP-214, APP-215, REP3-052, APP-217, REP3-054, APP-219].**
EB.OS1	The areas listed below and identified on the proposals plan are designated as Local Green Spaces and will be protected from development that is not consistent with their function as Local Green Spaces due to their particular local significance and community value unless very special circumstances can be demonstrated: O1 Land surrounding All Saints Church and the Recreation Grounds	The Scheme will not impact any useable and publicly accessible areas of open space or playing fields.

Table 20: Earls Barton Neighbourhood Plan 2011-2031 (Adopted 2016) (EBNP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	O2 Playing Fields and recreation land surrounding Earls Infant and Junior Schools O3 Sports and Leisure pitches located around the Grange O4 Public realm at The Knoll, Land between Cordon Crescent and Dowthorpe Hill O5 Public realm land on the corner of Elizabeth Way and Manor Road O6 Earls Barton Pocket Park land South of A45	

4.2 Lavendon Neighbourhood Plan

Table 21: Lavendon Neighbourhood Plan 2019 to 2031 (Adopted 2020) (LNP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Policy E1 (Access to the Countryside)	Proposals to improve public access to the countryside will be encouraged and supported, including the opening of new footpaths, bridleways and cycling routes to improve connections between Lavendon and the surrounding villages.	The Scheme will not result in any restriction to accessing publicly accessible parts of the Countryside including PROWs, bridlways and footpaths. The OPRoWMP **[REP1-147]** contains details of the routes affects including any diversion orders that are necessary to maintain access during the construction and operational phases of the Scheme.
Policy E2 (Biodiversity Offset and Development)	Development proposals should enhance the natural environment and contribute to biodiversity net gains within the Parish in line	Assessment of ecological impacts is set out in ES Chapter 9: Ecology and Biodiversity **[REP1-033]**. Section 6.7 of the Planning Statement

Table 21: Lavendon Neighbourhood Plan 2019 to 2031 (Adopted 2020) (LNP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	with Plan:MK Policy NE3. Biodiversity Improvements will help in mitigating against the adverse effects that development has on the environment. Development proposals should include baseline information on the environmental value of the site and demonstrate how its quality can be maintained or enhanced through the introduction of adequate mitigation. Proposals that would benefit the wider Parish will be looked at favourably. Planting of high-quality native trees and shrubs will be expected as part of the development landscaping scheme. To avoid habitat fragmentation and maintain/enhance existing ecological networks, on-site mitigation will be encouraged. Where this cannot be achieved, development proposals will have to demonstrate why and contribute towards effective off-site mitigation projects. Developers will be expected to maintain new planting schemes for a period of 2 years from completion of construction works, either directly or through the appointment of a management company. The developer will be expected to remove and replace any	**[EX4/GH7.15_B]** concludes that with the embedded mitigation measures proposed which are wide-ranging and respond directly to the type of species and habitats that are affected, the Scheme is expected to have an overall significant benefit. A Biodiversity Net Gain (BNG) Assessment, using Defra's Metric 4.0 has been provided within the DCO application **[REP1-043]**. This sets out the significant net gains in biodiversity will be delivered as part of the the Scheme. The Scheme has taken advantage of opportunities to conserve and enhance biodiversity and accords with this policy. The Scheme has therefore incorporated improvements in biodiversity and accords with this policy. See also Section 6.7 of the Planning Statement **[EX4/GH7.15_B]** for further detail on the biodiversity measures incorporated and compliance with planning policy. These local policies must be considered in the context of the nationally significant benefits that the Scheme will bring, and the likely increased level of effect that is associated with, and acceptable for, a scheme of this scale in comparison with a smaller scheme that would deliver only locally or regionally significant

Table 21: Lavendon Neighbourhood Plan 2019 to 2031 (Adopted 2020) (LNP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	dead/dying/decaying vegetation identified within that timeframe.	benefits and for which the local policies are designed to deal with. The Scheme will therefore adhere to the requirements of this policy.
Policy E3 (Trees and Hedgerows)	All development proposals should identify any significant trees within the site or affected by the proposals and demonstrate how these trees will be protected in accordance with BS5837 or the equivalent standards. Mitigation and protection schemes must be implemented prior to construction work commencing and must be retained in good order throughout the construction period. If the loss of trees and/or other established vegetation cannot be avoided, all development proposals will have to allow for clear, effective measures to offset the loss of biodiversity. This may include (but may not be limited to) planting new, high-quality trees and/or funding off-site planting schemes (although on-site mitigation is encouraged).	The Scheme will include extensive tree planting and generate a significant uplift in biodiversity net gain. The loss of trees and/or other established vegetation has been avoided where practicable through design and mitigation measures. Please see response above which further addresses the BNG aspects of the Scheme.
Policy CD1 (Conservation and Heritage)	Development proposals should protect, conserve and, wherever possible, enhance the significance of heritage assets within the Parish, including the character and appearance of the Conservation Area, Listed	Section 12.7 of Chapter 12: Cultural Heritage of the ES **[APP-049]** outlines the mitigation measures embedded within the Scheme design pertaining to cultural heritage. This includes the provision of stand-offs between the Scheme and heritage assets in order to help to preserve

Table 21: Lavendon Neighbourhood Plan 2019 to 2031 (Adopted 2020) (LNP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	Buildings, Ancient Monuments and their settings. This will include consideration of the following: a) The setting of any nearby listed buildings and their curtilages. b) The setting of Ancient Monuments. c) Impact on the character and setting of the Conservation Area. d) Site specific design issues, including demonstration that proposals would make a positive contribution to the street scene, would be sympathetic to the character of neighbouring properties and would incorporate high-quality materials. Development proposals that would harm the character and setting of the Conservation Area and heritage assets will be resisted.	their setting during the construction, operational and decommissioning periods. Appropriate and sensitive screening has also been developed and implemented to minimise the visual intrusion of the Scheme, while avoiding, obscuring or intruding upon key views and relationships between heritage assets.
Policy CD2 (High Quality Design)	All new development should demonstrate high quality design, respect the character of the surrounding area and enhance the quality of design within the village wherever possible. Development proposals that would enhance the character and appearance of the Conservation Area will be supported.	As detailed in Section 6.3 of the Planning Statement **[EX4/GH7.15_B]**, the Scheme has been subject to a detailed and sensitive iterative design process. This has taken account of the context and features of the land within the Order limits, nearby sensitive receptors and assets, information emerging from environmental surveys, feedback from stakeholders, and opportunities and constraints in order to develop

Table 21: Lavendon Neighbourhood Plan 2019 to 2031 (Adopted 2020) (LNP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	A central part of achieving high quality design is responding to and integrating with local surroundings and landscape context, as well as the built environment through: a) Demonstrate how proposals achieve sustainable development and are integrated into the village to promote social inclusion and support of village facilities. b) Using high quality materials that complement the existing palette of materials used within the area. c) Being of a scale, density, massing, height, design and layout that reflect the character of the village or particular area in which the development proposal is located. d) Using stone walling and/or green hedging as appropriate for highway boundaries wherever possible, in keeping with the existing streetscape. e) Ensuring safe access for pedestrians, cyclists and road users. f) Providing adequate refuse and recycling storage incorporated into the scheme to minimise visual impact.	a good design that balances the need maximise the energy generation capacity of the Scheme, with the avoidance and mitigation of impacts, and provision of environmental and other enhancements, where practicable. The design process and basis of design decisions take are described in the Chapter 5: Alternatives and Design Evolution of the ES **[APP-042]** and the Design Approach Document **[APP-560]**.

Table 21: Lavendon Neighbourhood Plan 2019 to 2031 (Adopted 2020) (LNP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	g) Innovative design that is sustainable in its design, construction and operation. h) Promoting high quality interior spaces and the use of natural light and solar gain. i) Adopting the principles of sustainable urban drainage, where appropriate. All dwellings capable of being inhabited by families should provide sufficient private garden amenity space to meet household recreational needs. These should be in scale with the dwelling, reflect the character of the area and be appropriate in relation to topography and privacy. Parking spaces should be located in a manner that ensures that parked cars do not overly dominate the street scene and do not form clusters of frontage car parking. Parking should be designed so that it fits in with the character of the proposed development. Considerations should include: j) Garages designed to reflect the architectural style of the house they serve. k) Garages set back from the street frontage. l) Parking located in between houses (rather than in front) so that it does not dominate the street scene.	

Table 21: Lavendon Neighbourhood Plan 2019 to 2031 (Adopted 2020) (LNP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
Policy FR1 (Development and Flood Risk)	To promote sustainable development and combat climate change, all new development in the Parish will be expected to adopt sustainable drainage schemes. Surface water runoff should be attenuated on site whenever possible, and if achievable, should be combined with semi-natural balancing ponds to provide enhanced biodiversity and new wildlife habitats. Encouragement will be given to enhancement of up-catchment flood storage, to hold surface water runoff away from the village.	ES Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]** sets out how flood risk relating to the Scheme is managed and mitigated so that the risk of flooding will not be increased. The OCEMP **[REP1-131]** sets out measures to manage surface water runoff during the construction period, including limiting the discharge of suspended solids. This includes: • Appropriate pollution control measures as agreed with the sewerage undertaker or the Environment Agency as appropriate. • Following the relevant sections of BS 6031: Code of Practice for Earthworks for the general control of site drainage. • Where practical, undertaking earthworks during the drier months of the year. • Topsoil/subsoil will be stored a minimum of 30m from watercourses on flat lying land. Where this not practicable, and it is to be stockpiled for longer than a two-week period, the material will either be covered with geotextile mats, seeded to promote vegetation growth, or runoff prevented from draining to a watercourse without prior treatment; and

Table 21: Lavendon Neighbourhood Plan 2019 to 2031 (Adopted 2020) (LNP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		• Runoff storage areas for the settlement of excessive fine particulates in runoff will be provided.
Policy FR2 (Delivery of new Flood Storage Ponds)	Support will be given to proposals to create new up-catchment flood storage ponds, to hold back surface water during storm events or in circumstances where the infiltration is inadequate. The ponds should be located where connectivity between them utilising by existing vegetation can be achieved where possible, to provide a series of linked natural habitats.	ES Chapter 10: Hydrology, Flood Risk and Drainage **[REP1-023]** sets out how flood risk relating to the Scheme is managed and mitigated so that the risk of flooding will not be increased. It concludes that there is no need for any compensatory flood storage is required as a result of the Scheme.
Policy HT1 (Transport, Highways and New Development)	New development proposals will be expected to demonstrate that a safe and satisfactory access can be achieved, including the delivery of visibility splays to meet the requirements of the Highway Authority. Proposals should demonstrate how pedestrian access to village facilities and services can be achieved, with connections to the existing footpath network delivered wherever possible. New development, including reserved matters, applications on existing permissions will be expected to demonstrate how information will be made available to the first occupiers to help them make sustainable, non-car-based transport choices, including	ES Chapter 13 Transport and Access **[REP2-003]** concludes during the construction phase, the assessment concludes that the likely effects of the Scheme on the above criteria will either be negligible or minor adverse in nature and not significant. The construction phase would not have a significant adverse effect on any of part of the Study Area. In terms of the operational phase During the operation phase, traffic associated with the operation and maintenance phase (including replacement of equipment) is considered to be lower than that associated with the construction phase. The effects of the scheme during the operation and maintenance phase will be lower or no worse than the construction phase.

Table 21: Lavendon Neighbourhood Plan 2019 to 2031 (Adopted 2020) (LNP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	maps for walking and cycling routes and information on bus services.	
Policy HT2 (Village Highway Enhancement)	Development proposals that include measures to reduce the impact of traffic, improve the highway environment within Lavendon and the wider Parish and to increase use of non-car modes of transport will be supported, subject to compliance with other policies of the Development Plan.	The Scheme will not have any significant adverse impact on the local highway network during the construction and operational phases subject to the mitigation measures set out in the OCEMP **[REP1-131]** and OOEMP **[EX4/GH7.2_B]**.
Policy H2 (Development Strategy)	There is a presumption in favour of sustainable development within the settlement boundary shown on the Policies Map, provided that the proposals comply with the provisions of the Lavendon Neighbourhood Plan and the Milton Keynes Development Plan. Development proposals, including windfall development, should: a) Preserve or enhance the character and appearance of the Conservation Area and/or listed buildings and/or conserve and enhance the setting of Ancient Monuments. b) Protect and wherever possible, enhance the rural character of the village. c) Preserve the wider landscape setting of the village.	The Scheme is a significant infrastructure project that will deliver significant environmental benefits through the generation of electricity. The Scheme has been carefully assessed, and it has been demonstrated that the impact would not be significant subject to mitigation measures being implemented. Chapter 12 Cultural Heritage **[APP-049]** demonstrates that the Scheme will not have a significant adverse effect on the setting and significance of identified heritage assets subject to embedded mitigation measures. Chapter 8 LVIA **[APP-045]** assesses the landscape and visual impact of the Scheme. Embedded mitigation measures have been included within the design of the Scheme to protect the landscape fabric of the Site. This includes various buffers to offset the development from existing landscape features

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Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	Outside of the settlement boundary the remainder of the Parish is defined as countryside. Development proposals will be supported where they are appropriate to the rural area and are in accordance with the NPPF and the Milton Keynes Development Plan.	on Site to ensure their protection and permanence. The OCEMP **[REP1-131]** sets out how these embedded mitigation measures are to be secured. Details of species and density for each planting typology is described within the OLEMP **[REP1-137]**. The OLEMP **[REP1-137]** prescribes how the mitigation measures are to be implemented and managed to ensure the effectiveness and certainty in achieving the objectives of the mitigation strategy.
Policy BE1 (Business and Employment)	Applications for development that will create employment will be positively supported subject to meeting the following criteria: a) The site is located within the defined settlement boundary or is an existing building suitable for conversion. New buildings outside of the settlement boundary will be supported in accordance with NPPF policy on the rural economy and the Milton Keynes Development Plan. b) The proposed development can be accommodated into its surroundings in terms of design, materials and is sympathetic to the character of the area. c) There would not be an adverse impact on the amenity of neighbouring properties and the character of the area by virtue of	Section 4 of the Planning Statement **[EX4/GH7.15_B]** describes some of the other benefits of the Scheme, in addition to the energy and climate change benefits. Benefits of the Scheme to the local community (other than the generation of a substantial amount of renewable energy), are set out in Section 4.6 of the Planning Statement **[EX4/GH7.15_B]**. These include: • A significant biodiversity net gain in habitat units (delivered through the creation of other neutral grasslands within the sites), in hedgerow units, and river units as shown within the Biodiversity Net Gain Assessment **[REP1-043]**. • Employment during the construction phase. It is expected that an average of 464 direct FTE jobs per annum will be created during

Table 21: Lavendon Neighbourhood Plan 2019 to 2031 (Adopted 2020) (LNP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
	parking, lighting, noise, vibration and fumes. d) The development can be safely accessed by the expected volume and size of vehicles, including staff and deliveries and would not generate traffic to such an extent that would harm the rural character of the village.	the construction period. During the operational phase, a gross 15 FTE direct staff per annum would be employed on the site, set out in ES Chapter 17: Socio-Economics, Tourism and Recreation **[APP-054]**. An OSSCEP **[APP-552]** will be prepared prior to the commencement of construction. This will set out measures that the Applicant will implement in order to advertise and promote employment opportunities associated with the Scheme in construction and operation locally. The Scheme cannot be located within a defined the settlement boundary due to the scale of development and need to locate the panels in locations to best optimise them for energy generation. Therefore, agricultural land which is open and relatively flat is the most suitable for this Scheme. Chapter 5 Alternatives and Design Evolution **[APP-042]** and Appendix 5.1 Site Selection Assessment **[REP1-037]** set out the process which the Applicant has followed in locating the Scheme where it is. The Scheme has been carefully designed to minimise its impact on the landscape and other sensitive designation that surrounding the sites. The Scheme has a life span of 60 years and so

Table 21: Lavendon Neighbourhood Plan 2019 to 2031 (Adopted 2020) (LNP)		
Relevant Paragraph / Policy Reference	**Policy Requirement**	**Compliance with Policy**
		after this time the infrastructure shall be dismantled and the land reinstated. The Scheme has been designed to minimise its impact on any nearby sensitive receptors such as houses and includes embedded mitigation measures to ensure the impact of noise, vibration and air quality are minimised. The measures are contained in Chapter 15 Glint and Glare **[APP-052],** Chapter 16 Air Quality **[APP-053]** and the OCEMP **[REP1-131].** Chapter 13 Transport and Access **[REP2-003]** has assessed the traffic forecast associated with the Scheme on the existing highway against existing traffic movement and proposed embedded mitigation measures to minimise any adverse impacts. An OCTMP **[REP3-064]** sets out measures of how construction traffic to and from each of the Sites will be managed and controlled to minimise its effects. Appropriate provision will be put in place to ensure that the programme for battery and panel equipment across the lifetime of the Scheme is such that traffic effects are minimised.