THE DROVES
SOLAR FARM

The Droves Solar Farm

Policy Compliance Document

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Contents

Table 1 NPS EN-1 – Table of Compliance

Policy	Policy Text	Draft Policy Text	Assessment
3.1 Introduction	3.1.1 This Part of the NPS explains why the government sees a need for significant amounts of new large-scale energy infrastructure to meet its energy objectives and why the government considers that the need for such infrastructure is urgent.	3.1.1 This Part of the NPS explains why the government sees a need for significant amounts of new large-scale energy infrastructure to meet its energy objectives and why the government considers that the need for such infrastructure is urgent.	The Scheme would make a significant contribution to the achievement of both the national renewable energy targets and to the UK's contribution to global efforts to reduce the effects of climate change. The **Planning Statement [APP/5.5]** and the **Statement of Need [APP/5.4]** set out that the Scheme will deliver a significant amount of low-carbon, low-cost and UK-located solar electricity generation capacity connecting to the National Electricity Transmission System, anticipated to be from 2033. 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. Given the Scheme comprises EIA development as defined by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, an EIA has been undertaken to assess the environmental impacts of the Scheme, with the findings presented in the **Environmental Statement (ES) [APP/6.1 - 6.5]**. The mitigation hierarchy has been appropriately applied to avoid, reduce and mitigate wherever practicable any likely significant adverse effects of the Scheme. In the case of the Scheme, a small number of localised and short term residual significant adverse effects remain, and are limited to effects on landscape and visual.. Given the relative large-scale nature of the Scheme and the substantial benefits it will provide, it is considered that these residual effects are outweighed. It is considered that these residual impacts do not meet the "exceptional circumstances" test and therefore do not warrant refusal of the application for development consent in circumstances where the Scheme is Critical National Priority (CNP) (see paragraph 4.1.7 of NPS EN-1). As reported in the **Planning Statement [APP/5.5],** the Scheme does not have an unacceptable interference with human health and public safety, defence, irreplaceable habitats and does not pose an unacceptable risk to the achievement of net zero. In addition, Section 3.3 of the **Planning Statement [APP/5.5]** sets out that there are a significant number of additional benefits that would be achieved by the Scheme, which must be weighed against any residual effects.
	3.1.2 However, it will not be possible to develop the necessary amounts of such infrastructure without some significant residual adverse impacts. These effects will be minimised by the application of policy set out in Parts 4 and 5 of this NPS. See also Part 2 of each technology specific NPS.	3.1.2 However, it will not be possible to develop the necessary amounts of such infrastructure without some significant residual adverse impacts. These effects will be minimised by the application of policy set out in Parts 4 and 5 of this NPS. See also Part 2 of each technology specific NPS.	
3.2 Secretary of State decision making	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 NDC.	3.2.1 The government's objectives for the energy system are to decarbonise power generation to meet the Clean Power 2030 Mission, ensuring our supply of energy always remains secure, reliable, affordable, and consistent with net zero emissions in 2050 for a wide range of future scenarios, including delivery of our carbon budgets and Nationally Determined Contributions.	The **Planning Statement [APP/5.5]** and **Statement of Need [APP/5.4]** set out that the Scheme will deliver a significant amount of low-carbon, low-cost and UK-located solar electricity generation capacity connecting to the National Electricity Transmission System, anticipated to be operational from 2033. The Scheme would contribute towards the UK Government meeting the overarching key national policy aims of: • Achieving Net Zero by 2050 and reducing emissions • Increasing the security of energy supply • Lowering the cost and increasing the affordability of generated electricity; and • Contributing to sustainable development and economic opportunities.

			This would help the UK diversify its energy supply, increase energy resilience, and support local and national carbon emission reduction targets. It would provide a reliable supply of electricity that seeks to help address the needs of the UK power market. The Scheme would also help the UK to meet carbon reduction commitments by significantly increasing the proportion of electricity supplied by renewable sources, which is reported as a significant beneficial effect in **ES Chapter 13: Climate Change [APP/6.2].**
	3.2.2 We need a range of different types of energy infrastructure to deliver these objectives. This includes the infrastructure described within this NPS but also more nascent technologies, data, and innovative infrastructure projects consistent with these objectives.	3.2.2 We need a range of different types of energy infrastructure to deliver these objectives. This includes the infrastructure described within this NPS but also more nascent technologies, data, and innovative infrastructure projects consistent with these objectives.	The Scheme would help the UK diversify its energy supply, increase energy resilience and help support local and national carbon emission reduction targets. The **Planning Statement [APP/5.5]** and **Statement of Need [APP/5.4]** set out that the Scheme will deliver a significant amount of low-carbon, low-cost and UK-located solar electricity generation capacity connecting to the National Electricity Transmission System from 2033. As noted by this policy, planning policy does not set limits on different technologies proposed, with the exception of new coal or large-scale oil-fired electricity generation. Therefore, the presence of additional low carbon technologies in the area, or the growing competition in the energy sector should not affect the need for the Scheme.
		3.2.3 The Clean Power 2030 Action Plan sets out a DESNZ ‘Clean Power Capacity range’ which is a range of possible installed capacities for each technology in 2030. The range reflects that there is no singular path to achieving clean power, but instead, that there are a range of scenarios that could get us there.	
	3.2.3 It is not the role of the planning system to deliver specific amounts or limit any form of infrastructure covered by this NPS. It is for industry to propose new energy infrastructure projects within the strategic framework set by government. With the exception of new coal or largescale oil-fired electricity generation, the government does not consider it appropriate for planning policy to set limits on different technologies but planning policy can be used to support the government’s ambitions in energy policy and other policy areas.	3.2.4 It is not the role of the planning system to deliver specific amounts or limit any form of infrastructure covered by this NPS. It is for industry to propose new energy infrastructure projects that they assess to be viable within the strategic framework set by government. This is the nature of a market-based energy system. With the exception of new coal or large-scale oil-fired electricity generation, the government does not consider it appropriate for planning policy to set limits on different technologies but planning policy can be used to support the government’s ambitions in energy policy and other policy areas.	
		3.2.5 The government’s strategic framework includes the Clean Power 2030 Action Plan and the pathways to 2030, the Strategic Spatial Energy Plan, and the Centralised Strategic Network Plan. These should be considered by applicants, together with other relevant considerations, and used to	The **Statement of Need [APP/5.4]** sets out evidence in support of ground mounted solar electricity generation generally, and the Scheme specifically, in relation to the benefit brought towards meeting the UK’s critical strategic needs, including those set out in the Clean Power 2030 Action Plan.

		inform developments of new energy infrastructure projects.	
	3.2.6 The Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is a need for those types of infrastructure, which is urgent, as described for each of them in this Part.	3.2.8 The Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is a need for those types of infrastructure which is urgent, as described for each of them in this Part.	Section 3.3 of the NPS EN-1 identifies an urgent need for new nationally significant electricity infrastructure. The Scheme addresses this need by delivering a significant amount of low-carbon, low-cost, and UK-located solar electricity generation capacity connected to the National Electricity Transmission System, anticipated to be operational from 2033. The **Statement of Need [APP/5.4]** concludes, in support of the settled policy position in Paragraphs 3.2.6 – 3.2.8 of NPS EN-1, that the decarbonisation, security of supply and affordability benefits delivered by the Scheme to the national urgent need for low-carbon generation should be accorded substantial weight in the planning balance.
	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.	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.	
	3.2.8The Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS.	3.2.10 The Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS	
	3.2.9 This NPS, along with any technology specific energy NPSs, sets out policy for nationally significant energy infrastructure covered by sections 15-21 of the Planning Act 2008	3.2.11 This NPS, along with any technology specific energy NPSs, sets out policy for nationally significant energy infrastructure covered by sections 15-21 of the Planning Act 2008.	The Scheme is an onshore generating station in England (which does not generate electricity from wind) with a generating capacity exceeding 50 MW. It is therefore classed as an NSIP under sections 14(1)(a), 15(1) and 15(2) of the PA 2008. The PA 2008 requires a DCO to be obtained for the development of NSIPs. The Applicant acknowledges this policy and confirms that a policy review of all relevant NPSs for Energy has been undertaken.
3.3 The need for electricity generating capacity	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 delivering any technology).	3.3.61 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	As discussed in the above responses to NPS EN-1 Paragraphs 3.2.1 and 3.2.2, the Scheme is urgently needed in order to meet the Government's energy objectives. The **Statement of Need [APP/5.4]** consistently concludes with NPS EN-1 that the decarbonisation, security of supply, and affordability benefits delivered by the Scheme to the national urgent need for low-carbon generation should be accorded substantial weight in the planning balance. The Scheme meets the definition of CNP Infrastructure because it is for the development of greater than 50MW capacity of a low carbon source of energy. As CNP infrastructure, the urgent need for the Scheme to assist in achieving the UK's energy objectives, together with the national security, economic, commercial, and net-zero benefits, will, in general, outweigh any other residual impacts that cannot be addressed by applying the mitigation hierarchy. Urgent and unprecedented actions are required on a global scale to halt climate change. A rapid increase in the supply of low-carbon electricity is needed for the UK to meet its legally binding climate change targets. Solar generation is a critical part of the UK's strategy to achieve net zero by 2050, a key step towards the government's national mission for 'Clean Power by 2030'. However, the need for new clean power does not stop at 2030. The continued delivery of low-carbon generation facilities beyond 2030 is necessary to meet future electricity demand growth outlined in the **Statement of Need [APP/5.4]** and achieve

		difficulties with delivering any technology)	essential wider societal carbon savings. It is also important to continue to bring forward schemes in case 'Clean Power by 2030' is not achieved. The NPSs do not set out any maximum targets for low-carbon infrastructure development (see Paragraph 3.2.3 of NPS EN-1). The UK should be developing as much low-carbon infrastructure as possible and as quickly as possible to meet the urgent need to reduce carbon emissions while ensuring a reliable, secure, and affordable supply. Section 9.5 of the **Planning Statement [APP/5.5]** considers the legal and regulatory requirements (Habitats Regulation Assessment, Water Framework Directive, the Infrastructure Planning (Application: Prescribed Forms and Procedures) Regulations 2009 and the EIA Regulations) and concludes that along with demonstrating compliance with the energy NPSs and application of the mitigation hierarchy, the CNP presumption applies to the Scheme.
	3.3.63 Subject to any legal requirements, the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure, and it should be progressed as quickly as possible.	3.3.66 Subject to any legal requirements, the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible.	
3.3 The need for new electricity networks	3.3.82 Government has committed to reduce emissions by 78 per cent by 2035 under carbon budget 6. According to the Net Zero Strategy this means that by 2035, all our electricity will need to come from low carbon sources, subject to security of supply, whilst meeting a 40-60 per cent increase in demand.	3.3.87 Government has committed to reduce GHG emissions by 78 per cent by 2035 under CB6. According to the Net Zero Strategy this means that by 2035, all our electricity will need to come from low carbon sources, subject to security of supply, whilst meeting a 40-60 per cent increase in demand.	
	3.3.83 Given the urgent need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation, there is an urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy.	3.3.88 Given the urgent need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation, there is an urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy.	
4.1 Weighing impacts and benefits	4.1.5 In considering any proposed development, in particular when weighing its adverse impacts against its benefits, the Secretary of State should take into account: • its potential benefits including its contribution to meeting the need for 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	4.1.5 In considering any proposed development, in particular when weighing its adverse impacts against its benefits, the Secretary of State should take into account: • its potential benefits including its contribution to meeting the need for the Clean Power 2030 Mission and net zero, energy infrastructure, job creation, reduction of geographical disparities, environmental enhancements, and any long-term or wider benefits • its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce,	The **Planning Statement [APP/5.5]** outlines, in Section 10, the planning balance for the Scheme, bringing together the likely significant beneficial effects of the Scheme and the likely significant residual adverse effects. The Scheme is set to provide the following benefits: • Substantial positive contribution to meeting the urgent need for renewable electricity generation in line with meeting net zero by 2050 targets • GHG savings • Delivering ecological enhancements and net gain by providing a minimum of 10% biodiversity net gain in habitat units and hedgerow units • Improvements to connectivity through the provision of approximately 3.8km of permissive path within the Order limits and approximately 1.2km of permissive paths outside of the Order limits • During construction, taking the net direct and indirect jobs together, the Scheme is expected to support 1,145 net additional jobs, with between 285 and 575 of these being taken by Local Catchment Area residents

	for any adverse impacts, following the mitigation hierarchy	mitigate or compensate for any adverse impacts, following the mitigation hierarchy	• Enhancement of local education through promoting apprenticeship and training schemes, to promote local recruitment and procurement, and to support agricultural workers in moving to diversified farming practices which can continue alongside operation of the Scheme The **outline Construction Environmental Management Plan (oCEMP) [APP/7.6]**, **outline Construction Traffic Management Plan (oCTMP) [APP/7.7]**, **outline Operational Environmental Management Plan (oOEMP) [APP/7.8]**, **outline Operational Traffic Management Plan (oOTMP) [APP/7.9]**, **outline Decommissioning Strategy (oDS) [APP/7.10]**, **outline Landscape and Ecological Management Plan (oLEMP) [APP/7.11]**, **outline Public Right of Way and Permissive Path Management Plan (oPRoWPPMP) [APP/7.12]**, **outline Soil Management Plan (oSMP) [APP/7.13]**, **outline Battery Safety Management Plan (oBSMP) [APP/7.14]**, **and outline Employment, Skills and Supply Chain Strategy (oESSCS) [APP/7.15]** set out all mitigation measures which are outlined in all the ES chapters. In the case of the Scheme, the residual significant adverse effects are limited to effects on landscape and visual. It is considered that these residual impacts do not meet the "exceptional circumstances" test and therefore do not warrant refusal of the application for development consent in circumstances where the Scheme is CNP infrastructure (see paragraph 4.1.7 of NPS EN-1). The Scheme does not pose an unacceptable interference with human health and public safety, defence, or irreplaceable habitats, nor does it pose an unacceptable risk to the achievement of net zero. The planning balance is firmly in favour of granting consent. Section 9.4 of the **Planning Statement [APP/5.5]** outlines that the Scheme would achieve a significant number of additional benefits. The Scheme is a well-considered and effectively designed proposal that responds to its locality and is sensitive to the local environment. It is therefore concluded that there are no significant environmental impacts arising that cannot be outweighed by the benefits of the Scheme. The **ES [APP/6.1 - 6.5]** sets out that the residual significant adverse effects of the Scheme are limited to effects on landscape and visual, which are localised and short term. The **ES [APP/6.1 - 6.5]** also sets out appropriate mitigation for these effects. Section 9.5 of the **Planning Statement [APP/5.5]** considers the CNP presumption, in accordance with this policy, and confirms that the CNP presumption will apply in relation to the Scheme. Given that the Applicant has demonstrated that the Scheme is in accordance with the NPSs, the mitigation hierarchy has been applied and compliance with other legal and regulatory requirements has also been demonstrated. Therefore, it can be concluded the CNP presumption applies to the Scheme and accordingly should be considered in the decision-making process. It concludes that, following application of the planning balance and CNP presumption, there is an overwhelming case in favour of granting development consent for the Scheme.
	4.1.6 In this context, the Secretary of State should take into account environmental, social and economic benefits and adverse impacts, at national, regional and local levels. These may be identified in this NPS, the relevant technology specific NPS, in the application or elsewhere (including in local impact reports, marine plans, and other material considerations as outlined in Section 1.1).	4.1.6 In this context, the Secretary of State should proportionately take into account environmental, social and economic benefits and adverse impacts, at national, regional and local levels. These may be identified in this NPS, the relevant technology specific NPS, in the application or elsewhere (including in local impact reports, marine plans, and other material considerations as outlined in Section 1.1).	
	4.1.7 Where this NPS or the relevant technology specific NPSs require an applicant to mitigate a particular impact as far as possible, but the Secretary of State considers that there would still be residual adverse effects after the implementation of such mitigation measures, the Secretary of State should weigh those residual effects against the benefits of the proposed development. For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases. This presumption, however, does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero. Further, the same exception applies to this presumption for residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk.	4.1.7 Where this NPS or the relevant technology specific NPSs require an applicant to mitigate a particular impact as far as possible, but the Secretary of State considers that there would still be residual adverse effects after the implementation of such mitigation measures, the Secretary of State should weigh those residual effects against the benefits of the proposed development. For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases. This presumption, however, does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence, or irreplaceable habitats. Further, the same exception applies to this presumption for residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk.	
Other Documents	4.1.10 The policy set out in this NPS and the technology specific energy NPSs is intended to provide greater clarity around existing policy and practice of the Secretary of State in considering applications for nationally significant energy	4.1.10 The policy set out in this NPS and the technology specific energy NPSs is intended to provide greater clarity around existing policy and practice of the Secretary of State in considering applications for	The Scheme's compliance with the NPSs is considered in Tables 1-3 of this **Policy Compliance Document [APP/5.6].**

	infrastructure, (or therefore the “benchmark” for what is, or is not, an acceptable nationally significant energy development).	nationally significant energy infrastructure, (or therefore the “benchmark” for what is, or is not, an acceptable nationally significant energy development).	
	4.1.11 The energy NPSs have taken account of the National Planning Policy Framework (NPPF), the Planning Practice Guidance (PPG) for England, and Planning Policy Wales and Technical Advice Notes (TANs) for Wales, where appropriate	4.1.11 The energy NPSs have taken account of the National Planning Policy Framework (NPPF), the Planning Practice Guidance (PPG) for England, and Planning Policy Wales and Technical Advice Notes (TANs) for Wales, where appropriate	The Scheme’s compliance with the NPPF is considered in Table 4 of this **Policy Compliance Document [APP/5.6].**
	4.1.12 Other matters that the Secretary of State may consider both important and relevant to their decision-making may include Development Plan documents or other documents in the Local Development Framework.	4.1.12 Other matters that the Secretary of State may consider both important and relevant to their decision-making may include Development Plan documents or other documents in the Local Development Framework.	The Scheme’s compliance with local policies is considered in Tables 5 and 6 of this **Policy Compliance Document [APP/5.6].** The Scheme it is expected to align with the three primary duties of the SSEP, promoting Net Zero, to enable the government to deliver on its legally binding emissions targets; Efficiency and economy, promoting efficient, coordinated and economic electricity; and security and supply, ensuring security of supply for current and future consumers of electricity and gas.
	4.1.13 Where the project conflicts with a proposal in a draft Development Plan, the Secretary of State should take account of the stage which the Development Plan document in England or Local Development Plan in Wales has reached in deciding what weight to give to the plan for the purposes of determining the planning significance of what is replaced, prevented, or precluded.	4.1.13 Where the project conflicts with a proposal in a draft Development Plan, the Secretary of State should take account of the stage which the Development Plan document in England or Local Development Plan in Wales has reached in deciding what weight to give to the plan for the purposes of determining the planning significance of what is replaced, prevented, or precluded.	
		4.1.15 The Secretary of State should also consider spatial plans, such as the Strategic Spatial Energy Plan upon endorsement by all relevant governments.	
	4.1.15 In the event of a conflict between these documents and an NPS, the NPS prevails for the purpose of Secretary of State decision making given the national significance of the infrastructure	4.1.16 In the event of a conflict between these documents and an NPS, the NPS prevails for the purpose of Secretary of State decision making given the national significance of the infrastructure.	The Applicant notes that in the event of a conflict between the Development Plan and the NPS, the NPS prevails for the purpose of the Secretary of State decision making given the national significance of the Scheme.
Development Consent	4.1.16 The Secretary of State should only impose requirements in relation to a development consent that are necessary, relevant to planning, relevant to the development to be consented, enforceable, precise, and reasonable in all other respects.	4.1.17 The Secretary of State should only impose requirements in relation to a development consent that are necessary, relevant to planning, relevant to the development to be consented, enforceable, precise, and reasonable in all other respects.	The **Explanatory Memorandum [APP/3.2]** to the **draft DCO [APP/3.1]** explains the purpose and effect of each provision in the **draft DCO [APP/3.1],** including why it is considered necessary, as required by Regulation 5(2)(c) of the APFP Regulations. It also identifies examples of precedents from other DCOs where applicable.
	4.1.17 The Secretary of State should consider the guidance in the NPPF, the PPG: Use of	4.1.18 The Secretary of State should consider the guidance in the NPPF, the Planning Practice Guidance: Use of	The Scheme’s compliance with the NPPF is considered in Table 4 of this **Policy Compliance Document [APP/5.6].** The Scheme has been developed with consideration of relevant Planning Practice Guidance.

	Planning Conditions, and TANs, or any successor documents, where appropriate.	Planning Conditions, and TANs, or any successor documents, where appropriate.	
	4.1.18 The Secretary of State may consider any development consent obligations that an applicant agrees with local authorities. These must be relevant to planning, necessary to make the proposed development acceptable in planning terms, directly related to the proposed development, fairly and reasonably related in scale and kind to the proposed development, and reasonable in all other respects.	4.1.19 The Secretary of State may consider any development consent obligations that an applicant agrees with local authorities. These must be relevant to planning, necessary to make the proposed development acceptable in planning terms, directly related to the proposed development, fairly and reasonably related in scale and kind to the proposed development, and reasonable in all other respects.	The **Explanatory Memorandum [APP/3.2]** to the **draft DCO [APP/3.1]** explains the purpose and effect of each provision in the **draft DCO [APP/3.1],** including why it is considered necessary, as required by Regulation 5(2)(c) of the APFP Regulations. It also identifies examples of precedents from other DCOs where applicable.
Early Engagement	4.1.19 Early engagement both before and at the formal pre-application stage between the applicant and key stakeholders, including public regulators, Statutory Consultees (including Statutory Nature Conservation Bodies (SNCBs)), and those likely to have an interest in a proposed energy infrastructure application, is strongly encouraged in line with the Government's pre-application guidance. This means that only applications which are fully prepared and comprehensive can be accepted for examination, enabling them to be properly assessed by the Examining Authority and leading to a clear recommendation report to the Secretary of State	4.1.20 Early engagement both before and at the formal pre-application stage between the applicant and key stakeholders, including public regulators, Statutory Consultees (including Statutory Nature Conservation Bodies (SNCBs)), and those likely to have an interest in a proposed energy infrastructure application, is strongly encouraged in line with the government's pre-application guidance. This means that only applications which are fully prepared and comprehensive can be accepted for examination, enabling them to be properly assessed by the Examining Authority and leading to a clear recommendation report to the Secretary of State.	Volume 5 includes the **Consultation Report [APP/5.1]** and its supporting appendices. The **Consultation Report [APP/5.1]** explains how the Applicant has complied with the consultation requirements set out in the PA 2008, the APFP Regulations, and the EIA Regulations. The **Consultation Report [APP/5.1]** also aligns with the guidance outlined in Nationally Significant Infrastructure Projects: Advice on the Consultation Report, published in August 2024, and Nationally Significant Infrastructure Projects: 2024 Pre-Application Prospectus, published in May 2024, where relevant. Section 4.4 of the **Consultation Report [APP/5.1]** details the early engagement workshops held by the Applicant. A **Shadow Habitats Regulations Assessment [APP/7.3]** has been prepared in accordance with the requirements of Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) to set out whether the Scheme is likely to have any significant effect on European designated sites. The report concludes that there will be no significant effects on European Sites during the construction, operation, or decommissioning phases of the Scheme, or in combination with other plans and projects.
	4.1.20 This is particularly so in the case of HRA matters covered in paragraphs 5.4.25 to 5.4.31 below, which explain the onus is on the applicant to submit sufficient information to enable the Secretary of State to conduct an Appropriate Assessment if required.	4.1.21 This is particularly so in the case of HRA matters covered in paragraphs 5.4.26 to 5.4.32 below, which explain the onus is on the applicant to submit sufficient information to enable the Secretary of State to conduct an Appropriate Assessment if required.	
Financial Viability	4.1.21 In deciding to bring forward a proposal for infrastructure development, the applicant will have made a judgement on the financial and technical viability of the proposed development, within the market framework and taking account of government interventions.	4.1.22 In deciding to bring forward a proposal for infrastructure development, the applicant will have made a judgement on the financial and technical viability of the proposed development, within the market framework and taking account of government interventions.	The **Funding Statement [APP/4.2]** and the **Grid Connection Statement [APP/7.1]** are submitted alongside the DCO Application, setting out how the Scheme is to be funded, and that the status of the grid connection is confirmed. The Applicant has considered these policies and confirms that the Scheme is expected to be project financed. The overall objective of the financing strategy for the Scheme is to provide full funding commitments prior to the commencement of construction and minimise the overall cost of funds to provide value for money on the cost of the delivered energy from this capital-intensive project. The Applicant has followed a site evaluation process that has taken into account environmental, physical, technical, social, and commercial considerations and opportunities, as well as engineering requirements. Therefore, the Applicant is
	4.1.22 Where the Secretary of State considers that the financial viability and technical feasibility of the proposal has been properly assessed by the applicant, it is unlikely to be of relevance in	4.1.23 Where the Secretary of State considers that the financial viability and technical feasibility of the proposal has been properly assessed by the applicant, it	

	Secretary of State decision making (any exceptions to this principle are dealt with where they arise in this or other energy NPSs and the reasons why financial viability or technical feasibility is likely to be of relevance explained).	is unlikely to be of relevance in Secretary of State decision making (any exceptions to this principle are dealt with where they arise in this, or other energy NPSs, and the reasons why financial viability or technical feasibility is likely to be of relevance explained).	confident that they have developed a sensitive and technically viable proposal at this stage. The Applicant wishes to retain flexibility regarding the design detail of certain components of the Scheme, as is acknowledged and allowed for in NPS EN-1 Section 4.3, Section 2.6 and Paragraph 2.10.70 of NPS EN-3. The extent of flexibility sought by the Applicant is described in **ES Chapter 5: The Scheme [APP/6.1].**
4.2 The critical national priority for low carbon infrastructure	4.2.1 Government has committed to fully decarbonising the power system by 2035, subject to security of supply, to underpin its 2050 net zero ambitions. More than half of final energy demand in 2050 could be met by electricity, as transport and heating in particular shift from fossil fuel to electrical technology.	4.2.1 Government has committed to the Clean Power 2030 Mission, subject to security of supply, to underpin its 2050 net zero ambitions. More than half of final energy demand in 2050 could be met by electricity, as transport and heating in particular shift from fossil fuel to electrical technology.	The Scheme would make a significant contribution to the achievement of both the national renewable energy targets and to the UK's contribution to global efforts to reduce the effects of climate change. The **Planning Statement [APP/5.5]** and the **Statement of Need [APP/5.4]** set out that the Scheme will deliver a significant amount of low-carbon, low-cost and UK-located solar electricity generation capacity connecting to the National Electricity Transmission System, anticipated to be from 2033. 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.
	4.2.2 Ensuring the UK is more energy independent, resilient and secure requires the smooth transition to abundant, low-carbon energy. The UK's strategy to increase supply of low carbon energy is dependent on deployment of renewable and nuclear power generation, alongside hydrogen and CCUS. Our energy security and net zero ambitions will only be delivered if we can enable the development of new low carbon sources of energy at speed and scale.	4.2.2 Ensuring the UK is more energy independent, resilient and secure requires the smooth transition to abundant, low-carbon energy. The UK's strategy to increase supply of low carbon energy is dependent on deployment of renewable and nuclear power generation, alongside hydrogen and CCUS. Our energy security and net zero ambitions will only be delivered if we can enable the development of new low carbon sources of energy at speed and scale.	
	4.2.3 With smart and strategic planning, the UK can maintain high environmental standards and minimise impacts while increasing the levels of deployment at the scale and pace needed to meet our energy security and net zero ambitions.	4.2.3 With smart and strategic planning, the UK can maintain high environmental standards and minimise impacts while increasing the levels of deployment at the scale and pace needed to meet our energy security and net zero ambitions.	
		4.2.4 As set out in NESO's advice to the Secretary of State and the Secretary of State's Clean Power Action Plan, the pace of planning delivery needs to significantly increase to allow the government to meet its Clean Energy targets. Many more development consent applications will have to enter the system, and be examined and decided within the statutory timescales. These decisions must be made in accordance with this NPS, relevant technology specific NPSs, and all relevant legal requirements, and applications must continue to meet the high standards expected.	The **Statement of Need [APP/5.4]** provides a detailed explanation of why the Scheme is urgently needed and how the Scheme addresses all relevant aspects of established and emerging government energy and climate change policies and commitments. The Applicant has had on-going engagement with officers from Breckland District Council, Norfolk County Council and the Borough Council of King's Lynn & West Norfolk. In addition to Councillors from local Parish Councils and statutory advisors, the full details of this consultation are described in the **Consultation Report [APP/5.1]** throughout the pre-application process. This engagement will continue throughout the examination process.

		4.2.5 Government is proposing amendments to infrastructure planning, including to the Planning Act process. Even with these changes, it will require a significant and sustained effort from applicants, planners, LPAs, statutory advisors, Examining Authorities and decision makers to meet this challenge, while listening to host communities. It is a challenge we must meet, and to do that each part of the system needs to work together efficiently to avoid unnecessary delays. Proportionality and focus at all stages of the project preparation, examination and decision making are vital.	
		4.2.6 Before applications are made applicants are required to carry out preapplication consultation on their proposals. The Planning Act 2008 requires only one such consultation, and proposals can change after that consultation without the need to reconsult, unless the project is so altered as to become a different project altogether. There is then further publicity, consultation and engagement within the formal Planning Act process.	The PA 2008 requires applicants for DCOs to carry out Statutory pre-application consultation on their proposals. The PA 2008 and related regulations set out the requirements for how this consultation must be undertaken, and the Applicant has also undertaken non-statutory consultation as part of developing its proposals and seeking feedback from consultees. Full details of this consultation are described in the **Consultation Report [APP/5.1]**.
		4.2.7 We recommend that applicants consider additional consents, licences and permit requirements at the earliest possible stage. Applicants should consider parallel tracking of the environmental permitting and planning applications, and engaging with the Environment Agency's (EA) permitting pre-application service to help ensure that project design considers the requirements of the environmental permitting regime at the earliest opportunity.	The **Consents and Agreements Position Statement [APP/7.5]** has been prepared as part of this 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 **draft DCO [APP/3.1].** The Applicant and the consenting bodies for the additional consents and licences listed in the **Consents and Agreements Position Statement [APP/7.5]** are in ongoing discussions, and the Applicant is confident that necessary agreements will be obtained either before or during the examination of this application, in exchange for the inclusion of appropriate protective provisions by the Applicant in the DCO. The Applicant has been in discussion with the following consenting bodies as set out in Appendix 1 of the **Consents and Agreements Position Statement [APP/7.5]**: • Office of Gas and Electricity Market (OFGEM) • National Grid Electricity System Operator Limited (NGESO) • Department for Transport, National Highways, Norfolk County Council as the Local Highway Authority • Natural England • Environment Agency • Anglian Water • Breckland Council • Health and Safety Executive

		4.2.8 Where it is required by law at the pre-application consultation stage, preliminary environmental information should be provided. This information should be enough for statutory advisors to develop an informed view of the likely significant environmental effects of the development. It is not expected to be the full, finalised Environmental Statement.	As set out in Section 1.4 of the **Planning Statement [APP/5.5]**, a statutory consultation (Phase Two Consultation: Updates plans and proposals) in compliance with Sections 42, 47 and 48 of the PA 2008 was undertaken between 21 May and 9 July 2025, supported by a Preliminary Environmental Impact Report (PEIR) in accordance with the EIA Regulations.
		4.2.9 While applicants may carry out further non-statutory consultation, these should serve a clear purpose and be focused and targeted at ensuring the project is ready for the statutory consultation. Applicants should avoid using these repeated consultations to test the minimum level of mitigation and compensation for impacts. Instead, mitigations should be built in from the start. For this reason, early engagement with relevant statutory consultees is recommended and applicants should maintain this engagement throughout pre-application. This ensures that issues are identified and addressed as early as possible.	The PA 2008 requires applicants for DCOs to carry out Statutory pre-application consultation on their proposals. The PA 2008 and related regulations set out the requirements for how this consultation must be undertaken, and the Applicant has also undertaken non-statutory consultation as part of developing its proposals and seeking feedback from consultees. Full details of this consultation are described in the **Consultation Report [APP/5.1]**.
		4.2.10 Objections to the adequacy of pre-application consultation must be fair, accurate and not based on the objector's view of the underlying scheme. So long as an applicant has acted reasonably and met the statutory requirements there should be no objections to the adequacy of the consultation process.	The **Statement of Need [APP/5.4]** provides a detailed explanation of why the Scheme is urgently needed, and how the Scheme addresses all relevant aspects of established and emerging government energy and climate change policies and commitments. The Applicant has carried out non-statutory, statutory and further targeted consultation on the Scheme at the pre-application stage. Section 7.4 of the **Consultation Report [APP/5.1]** sets out the Applicant is confident that the seven-week statutory consultation period provided adequate time for participation and feedback, exceeding the minimum 28-day statutory requirement. The Applicant considers that the DCO Application for development consent is considered ready for examination. The application includes a proportionate and focused ES setting out the identification of likely significant effects of the Scheme, and the mitigation measures considered to address these. During examination, the Applicant will be providing tracked change versions of amended documents alongside the clean versions. The Applicant has engaged collaboratively with the LPAs during the pre-application phase as set out within the relevant technical chapters of **ES Topic Chapters [APP/6.2]** and the **Consultation Report [APP/5.1].**
		4.2.11 MHCLG publish clear guidance on the pre-application stage and PINS offer a pre-application advice service. To meet the Clean Energy challenge applicants must engage with and take note of this guidance and advice.	
		4.2.12 Applicants must ensure that applications are ready to be examined before an application is made. The Planning Act system is designed to be frontloaded and applications should not enter the statutory system if they not ready to be consented. Examining Authorities, and indeed Secretaries of State, should be focused on considering the planning merits	

		of an application, and not using time during the examination and decision-making stages seeking to address deficiencies in an application. Applicants and affected parties should ensure that protective provisions have been agreed ahead of statutory deadlines.	
		4.2.13 Applicants and their consultants and advisors must ensure that their applications are clear and accessible to both the public and decision makers. To meet the Clean Power 2030 Mission proportionality, clarity and focus will be priceless. Without them the planning process will not be able to move at the required pace. Applicants must ensure their applications are concise whilst still containing the necessary, high quality, information the Examining Authority, statutory consultees and the Secretary of State expect to see in order to make an informed decision. The ES should therefore be proportionate and focused, with just the sufficient detail required to identify clearly the likely significant effects from the proposal.	
		4.2.14 With the increasing number of development consent applications coming forward, this will put pressure on existing systems within the NSIP regime. It's therefore important that all parts of the system work together with a common purpose to ensure that the impacts of projects are properly assessed and mitigated so that good quality schemes are consented. LPAs and statutory advisors need the best and most assessable information from applicants so that they can easily spot all the relevant issues, agree the majority of those issues early and focus their attention on any controversial issues. Applicants providing tracked change versions of amended documents alongside the clean versions is encouraged. Applicants should see their relationships with LPAs and statutory advisors as a valuable collaborative one.	
		4.2.15 Similarly, applicants, consultees, examiners and decision makers, and all their legal teams must work together to streamline the formal DCO itself. Too much	

		time is spent amending what should be more or less standard DCO provisions. Applicants should seek to take a standard approach to issues like compulsory purchase powers, the discharge of requirements and arbitration. Subtle changes should not be introduced to make a development easier to carry out and standard articles, such as those on human remains and mineral rights should only be used where there is a known burial ground or mineral rights holder, not added in unnecessarily.	
	4.2.4 Government has therefore concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure.	4.2.16 Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure to meet the Clean Power 2030 Mission and net zero. Paragraphs 4.2.17 and 4.2.18 below set out the projects to be prioritised for the Clean Power 2030 Mission. The CNP policy below applies to these projects. This does not extend the definition of what counts as nationally significant infrastructure: the scope remains as set out in the Planning Act 2008.	As outlined in Section 5 of the **Planning Statement [APP/5.5]**, the Scheme is classified as CNP Infrastructure. The **Statement of Need [APP/5.4]** consistently concludes with NPS EN-1 that the decarbonisation, security of supply and affordability benefits delivered by the Scheme to the national urgent need for low-carbon generation should be accorded substantial weight in the planning balance. The Scheme meets the definition of CNP Infrastructure because it is for the development of greater than 50MW capacity of a low carbon source of energy. As CNP infrastructure, the urgent need for the Scheme to assist in achieving the UK's energy objectives, together with the national security, economic, commercial, and net zero benefits, will, in general, outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy.
	4.2.5 This does not extend the definition of what counts as nationally significant infrastructure: the scope remains as set out in the Planning Act 2008. Low carbon infrastructure for the purposes of this policy means: • for electricity generation, all onshore and offshore generation that does not involve fossil fuel combustion (that is, renewable generation, including anaerobic digestion and other plants that convert residual waste into energy, including combustion, provided they meet existing definitions of low carbon; and nuclear generation), as well as natural gas fired generation which is carbon capture ready • for electricity grid infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as substations. This is not limited to those	4.2.17 Low carbon infrastructure for the purposes of this policy means: for electricity generation, all onshore and offshore generation that does not involve fossil fuel combustion (that is, renewable generation, including anaerobic digestion plants provided they meet existing definitions of low carbon; and nuclear energy generation), as well as natural gas fired generation which is carbon capture ready for electricity grid infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as substations.	

	associated specifically with a particular generation technology, as all new grid projects will contribute towards greater efficiency in constructing, operating and connecting low carbon infrastructure to the National Electricity Transmission System for other energy infrastructure, fuels, pipelines and storage infrastructure, which fits within the normal definition of “low carbon”, such as hydrogen distribution, and carbon dioxide distribution • for energy infrastructure which is directed into the NSIP regime under section 35 of the Planning Act 2008, and fit within the normal definition of “low carbon”, such as interconnectors, Multi-Purpose Interconnectors, or ‘bootstraps’ to support the onshore network which are routed offshore • Lifetime extensions of nationally significant low carbon infrastructure, and repowering of projects	4.2.18 This is not limited to those associated specifically with a particular generation technology, as all new grid projects will contribute towards greater efficiency in constructing, operating and connecting low carbon infrastructure to the National Electricity Transmission System for other energy infrastructure, fuels, pipelines and storage infrastructure, which fits within the normal definition of “low carbon”, such as hydrogen distribution, and carbon dioxide distribution for energy infrastructure which is directed into the NSIP regime under section 35 of the Planning Act 2008, and fit within the normal definition of “low carbon”, such as interconnectors, Offshore Hybrid Assets, or ‘bootstraps’ to support the onshore network which are routed offshore Lifetime extensions of nationally significant low carbon infrastructure, and repowering of projects.	
	4.2.6 The overarching need case for each type of energy infrastructure and the substantial weight which should be given to this need in assessing applications, as set out in paragraphs 3.2.6 to 3.2.8 of EN-1, is the starting point for all assessments of energy infrastructure applications.	4.2.19 The overarching need case for each type of energy infrastructure and the substantial weight which should be given to this need in assessing applications, as set out in paragraphs 3.2.8 to 3.2.10 of EN-1, is the starting point for all assessments of energy infrastructure applications.	The **Statement of Need [APP/5.4]** provides a detailed explanation of why the Scheme is urgently needed, and how the Scheme addresses all relevant aspects of established and emerging government energy and climate change policies and commitments. It concludes that the decarbonisation, security of supply and affordability benefits delivered by the Scheme to the national urgent need for low-carbon generation should be accorded substantial weight in the planning balance.
	4.2.7 The CNP policy does not create an additional or cumulative need case or weighting to that which is already outlined for each type of energy infrastructure. The policy applies following the normal consideration of the need case, the impacts of the project, and the application of the mitigation hierarchy. As such, it is relevant during Secretary of State decision making and specifically in reference to any residual impacts that have been identified. It should therefore also be given consideration by the Examining Authority when it is making its recommendation to the Secretary of State	4.2.20 The CNP policy does not create an additional or cumulative need case or weighting to that which is already outlined for each type of energy infrastructure. The policy applies following the normal consideration of the need case, the impacts of the project, and the application of the mitigation hierarchy. As such, it is relevant during Secretary of State decision making and specifically in reference to any residual impacts that have been identified. It should therefore also be given consideration by the Examining Authority when it is making its recommendation to the Secretary of State.	The **Statement of Need [APP/5.4]** and Section 9.5 of the **Planning Statement [APP/5.5]** set out the need for the Scheme and note the established need for low-carbon infrastructure as a CNP and that such schemes should be brought forwards with urgency. In compliance with this policy, the **Planning Statement [APP/5.5]** sets out the need case, the impacts of the Scheme, the application of the mitigation hierarchy, and applies the planning balance in consideration of any benefits and residual adverse impacts before applying the CNP presumption at Section 9.5. Section 9.5 of the **Planning Statement [APP/5.5]** confirms that the CNP presumption applies in the case of this Scheme. The Applicant has considered this NPS and relevant technology specific energy NPSs, applying the mitigation hierarchy, as well as any other legal and regulatory requirements to the Scheme as CNP infrastructure. The **ES [APP/6.1 – 6.5]** provides the baseline environmental information available for the study areas that are relevant for the environmental assessment undertaken, the
	4.2.8 During decision making, the CNP policy will influence how non-HRA and non-MCZ residual impacts are considered in the planning	4.2.21 During decision making, the CNP policy will influence how non-HRA and non-MCZ residual impacts are considered in the	

	balance. The policy will therefore also influence how the Secretary of State considers whether tests requiring clear outweighing of harm, exceptionality, or very special circumstances have been met by a CNP Infrastructure application. Further detail is provided in paragraphs 4.2.15 to 4.2.17, and Figure 2.	planning balance. The policy will therefore also influence how the Secretary of State considers whether tests requiring clear outweighing of harm, exceptionality, or very special circumstances have been met by a CNP Infrastructure application. Further detail is provided in paragraphs 4.2.28 to 4.2.30, and Figure 2	description of the likely environmental effects arising from the Scheme, and the mitigation measures proposed to mitigate or reduce adverse environmental effects for the Scheme, as well as any necessary monitoring measures. In addition, the Applicant has ensured that a mitigation hierarchy has been applied throughout the Scheme, starting from the site selection stage and informing the design of the Scheme to avoid, reduce, mitigate, or compensate for any adverse impacts. The **ES Topic Chapters [APP/6.2]** are structured to outline the impacts of the Scheme on the construction, operational, and decommissioning phases. The **ES Topic Chapters [APP/6.2]** identify the significance of an impact upon an assessed receptor, taking account of the environmental measures secured by the Scheme's design. As set out in **ES Chapter 2: EIA Process and Methodology [APP/6.1]**, a Cumulative Effects Assessment (CEA) has been undertaken as part of the EIA in accordance with PINS Advice on Cumulative Effects Assessment (September 2024) and has considered two types of cumulative effects: • In combination effects: the combined effect generated by individual effects on a particular receptor (presented within **ES Chapter 17: In-Combination Effects [APP/6.2]**); and • Cumulative effects: effects generated by the Scheme and other planned or approved developments on the same receptor (presented in **ES Volume 2, Chapters 6 to 16 [APP/6.2]**). To ensure clarity regarding how the proposed embedded and additional mitigation measures are secured, a **Design Principles, Parameters, and Commitments [APP/5.8]** has been included within the DCO Application. This Register follows PINS Guidance and identifies how commitments will be secured and implemented, to ensure potential environmental effects arising from the Scheme are avoided, reduced or mitigated as far as possible, in accordance with the mitigation hierarchy, and as set out in the technical assessments detailed in **ES Topic Chapters [APP/6.2]**. It is noted that the **Design Principles, Parameters and Commitments [APP/5.8]** is a 'live' document that will be updated throughout the DCO examination period. Also the **Commitments Register [APP/6.5]** sets out the Scheme's mitigation measures, including any monitoring requirements, as well as how mitigation measures are secured in the DCO application. The **Design Principles, Parameters, and Commitments [APP/5.8]** are linked to the management plans that are secured and monitored via requirements in the **draft DCO [APP/3.1]**.
	4.2.10 Applicants for CNP infrastructure must continue to show how their application meets the requirements in this NPS and the relevant technology specific NPS, applying the mitigation hierarchy, as well as any other legal and regulatory requirements.	4.2.23 Applicants for CNP infrastructure must continue to show how their application meets the requirements in this NPS and the relevant technology specific NPS, applying the mitigation hierarchy, as well as any other legal and regulatory requirements.	
	4.2.11 Applicants must apply the mitigation hierarchy and demonstrate that it has been applied. They should also seek the advice of the appropriate SNCB or other relevant statutory body when undertaking this process. Applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated.	4.2.24 Applicants must apply the mitigation hierarchy and demonstrate that it has been applied. They should also seek the advice of the appropriate SNCB or other relevant statutory body when undertaking this process. Applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated. Measures that result in a material reduction in generation capacity for CNP infrastructure are unlikely to be considered to be appropriate as mitigation.	
	4.2.12 Applicants should set out how residual impacts will be compensated for as far as possible. Applicants should also set out how any mitigation or compensation measures will be monitored and reporting agreed to ensure success and that action is taken. Changes to measures may be needed e.g. adaptive management. The cumulative impacts of multiple developments with residual impacts should also be considered.	4.2.25 Compensation, by definition, does not reduce an adverse effect resulting from a development. However, applicants should set out how residual impacts will be compensated for as far as possible. Applicants should also set out how any mitigation or compensation measures will be monitored and reporting agreed to ensure success and that action is taken. Changes to measures may be needed e.g. adaptive management. The cumulative impacts of multiple developments with residual impacts should also be considered.	
	4.2.14 The Secretary of State will continue to consider the impacts and benefits of all CNP Infrastructure applications on a case-by-case basis. The Secretary of State must be satisfied that the applicant's assessment demonstrates that the requirements set out above have been met. Where the Secretary of State is satisfied that they have been met the CNP presumptions set out below apply.	4.2.27 The Secretary of State will continue to consider the impacts and benefits of all CNP Infrastructure applications on a case-by-case basis. The Secretary of State must be satisfied that the applicant's assessment demonstrates that the requirements set out above have been met. Where the Secretary of State is satisfied that they have been	The **Statement of Need [APP/5.4]** consistently concludes with NPS EN-1 that the decarbonisation, security of supply and affordability benefits delivered by the Scheme to the national urgent need for low-carbon generation should be accorded substantial weight in the planning balance. The Scheme meets the definition of CNP Infrastructure because it is for the development of greater than 50MW capacity of a low-carbon source of energy. As CNP infrastructure, the urgent need for the Scheme to assist in achieving the UK's energy objectives, together with the national security, economic, commercial, and net zero benefits, will, in general, outweigh any other

		met, the CNP presumptions set out below apply.	residual impacts not capable of being addressed by application of the mitigation hierarchy.
Non-HRA and non -MCZ residual impacts of CNP Infrastructure	4.2.15 Where residual non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. Therefore, in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts. The exception to this presumption of consent are residual impacts onshore and offshore which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero. Further, the same exception applies to this presumption for residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk.	4.2.28 Where residual non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. Therefore, in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts. The exception to this presumption of consent are residual impacts onshore and offshore which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, or irreplaceable habitats. Further, the same exception applies to this presumption for residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk.	The **Planning Statement [APP/5.5]** under Section 9 confirms that the CNP presumption applies to the Scheme. As summarised in the **Planning Statement [APP/5.5]**, there are no residual impacts as a result of the Scheme which would outweigh the need, nor are there any residual impacts which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, irreplaceable habitats, the achievement of net zero, offshore navigation, flood and coastal erosion. As explained within the **Planning Statement [APP/5.5],** any harm caused by the Scheme is outweighed by the substantial benefits that are delivered. It is considered that even without applying the CNP presumption, the planning case is firmly in favour of development consent being granted.
	4.2.16 As a result, the Secretary of State will take as the starting point for decision-making that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances.	4.2.29 As a result, the Secretary of State will take as the starting point for decision-making that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances.	
4.3 Environmental effects/ considerations	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	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 for the Scheme is accompanied by an **ES [APP/6.1 – 6.5]** that describes aspects of the environment likely to be significantly affected by the Scheme. The **ES [APP/6.1 – 6.5]** covers the environmental, social and economic effects arising from the construction, operation and decommissioning of the Scheme. The **Planning Statement [APP/5.5]** under section 9.4 Planning Balance sets out the full list of other benefits that arise from the Scheme, beyond making a significant contribution to the UK's policy commitments and legal decarbonisation targets.
	4.3.4 To consider the potential effects, including benefits, of a proposal for a project, the applicant must set out information on the likely significant environmental, social, and economic effects of the development, and show how any likely significant negative effects would be avoided, reduced, mitigated, or compensated for, following the mitigation hierarchy. This information could include matters such as	4.3.4 To consider the potential effects, including benefits, of a proposal for a project, the applicant must set out information on the likely significant environmental, social, and economic effects of the development, and show how any likely significant negative effects would be avoided, reduced, mitigated, or compensated for, following the mitigation hierarchy. This information could include matters such as employment, equality,	

	employment, equality, biodiversity net gain, community cohesion, health, and well-being.	biodiversity net gain, community cohesion, health, and well-being.	
	4.3.5 For the purposes of this NPS and the technology specific NPSs the ES should cover the environmental, social, and economic effects arising from pre-construction, construction, operation and decommissioning of the project.	4.3.5 For the purposes of this NPS and the technology specific NPSs the ES should cover the environmental, social, and economic effects arising from pre-construction, construction, operation and decommissioning of the project.	The **ES [APP/6.1 – 6.5]** covers the environmental, social and economic effects arising from the pre-construction, construction, operation and decommissioning of the Scheme.
	4.3.10 The applicant must provide information proportionate to the scale of the project, ensuring the information is sufficient to meet the requirements of the EIA Regulations.	4.3.10 The applicant must provide information proportionate to the scale of the project, ensuring the information is sufficient to meet the requirements of the EIA Regulations.	The Applicant wishes to retain flexibility regarding the design detail of certain components of the Scheme. The extent of flexibility required is described in **ES Chapter 5: The Scheme [APP/6.1]** and set out in the **Design Approach Document [APP/5.7]** and **Design Principles, Parameters and Commitments [APP/5.8]**. The Applicant's approach to EIA, including the use of the Rochdale envelope to assess effects, is set out in **ES Chapter 5: The Scheme [APP/6.1]** and **ES Chapter 3: EIA Process and Methodology [APP/6.1]**. With the above need for flexibility in mind, the Applicant confirms that the ES has assessed the likely worst-case development scenario. Establishing the maximum and, where relevant, minimum parameters enables a robust assessment of likely significant environmental effects to be undertaken within the ES for topics where the nature of the assessment requires a specific level of detail, such as maximum heights, massing, or noise levels. Thus, the assessment parameters serve as the basis for the assessment. The assessment parameters are detailed in the works descriptions, which are linked to Schedule 1 within the **draft DCO [APP/3.1]** and are spatially shown in the **Works Plan [APP/2.3]** and a number of control documents, as listed within the **Guide to the Application [APP/1.3].** The Applicant confirms that it has provided a level of information proportionate to the scale of the Scheme which is sufficient to meet the requirements of the EIA Regulations.
	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 Application to have been settled in precise detail. Where this is the case, the applicant should explain in its application which elements of the Application have yet to be finalised, and the reasons why this is the case.	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 Application to have been settled in precise detail. Where this is the case, the applicant should explain in its application which elements of the Application have yet to be finalised, and the reasons why this is the case.	
	4.3.12 Where some details are still to be finalised, the ES should, to the best of the applicant's knowledge, assess the likely worst-case environmental, social and economic effects of the Application to ensure that the impacts of the project as it may be constructed have been properly assessed	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 Application to ensure that the impacts of the project as it may be constructed have been properly assessed	The impact assessment within the **ES Topic Chapters [APP/6.2]** is based on the worst-case parameters for each technical topic, and the justification is presented within the relevant technical chapter. The EIA presented within the **ES [APP/6.1 - 6.5]** has been undertaken adopting the principles set out in the Planning Inspectorate's Advice Note Nine: Rochdale Envelope which provides guidance regarding the degree of flexibility that may be considered appropriate within an application for development consent under the Planning Act 2008. **ES Chapter 2: EIA Process and Methodology [APP/6.1]** sets out for each technical discipline, the maximum (and where relevant, minimum) parameters for the elements where flexibility needs to be retained have been assessed under the Rochdale Envelope approach. The approach also recognises that the worst-case parameter for one technical assessment may differ from another, ensuring that worst case overall impacts are predicted. Each technical chapter (**Chapter 6 to Chapter 16 [APP/6.2]**) describes the parameters applied in relation to the relevant assessment.

	4.3.15 Applicants are obliged to include in their ES, information about the reasonable alternatives they have studied. This should include an indication of the main reasons for the applicant's choice, taking into account the environmental, social, and economic effects and including, where relevant, technical and commercial feasibility.	4.3.15 Applicants are obliged to include information about the reasonable alternatives they have studied in their ES. This should include an indication of the main reasons for the applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility	Regulation 14(1)(d) of the EIA Regulations requires that an environmental statement include a description of the reasonable alternatives studied. **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** and **Appendix 1: Site Evaluation Report** to the **Planning Statement [APP/5.5]** describe the detailed site evaluation and assessment of alternatives process undertaken by the Applicant. **Appendix 1: Site Evaluation Report** to the **Planning Statement [APP/5.5]** sets out the background and approach to the site evaluation process, which the Applicant has undertaken, for both the siting of the proposed National Grid Substation and the evaluation of land available for solar development, resulting in the land that is subject to the Scheme being brought forward. The evaluation considers the locational criteria (environmental, social, economic, and engineering constraints) that geographically influenced the area of search. After selecting the preferred locations for the components of the Scheme, based on the locational criteria and factors mentioned above, the Applicant developed a set of core design principles, which are described in the **Design Approach Document [APP/5.7]**. These have then influenced the optioneering and the identification of a preferred design, which then underwent further technical and feasibility assessments.
	4.3.16 In some circumstances, the NPSs may impose a policy requirement to consider alternatives.	4.3.16 In some circumstances, the NPSs may impose a policy requirement to consider alternatives.	
	4.3.17 Where there is a policy or legal requirement to consider alternatives, the applicant should describe the alternatives considered in compliance with these requirements.	4.3.17 Where there is a policy or legal requirement to consider alternatives, the applicant should describe the alternatives considered in compliance with these requirements.	
	4.3.18 The Secretary of State should consider the worst-case impacts in its consideration of the application and consent, providing some flexibility in the consent to account for uncertainties in specific project details.	4.3.18 The Secretary of State should consider the worst-case impacts in its consideration of the application and consent, providing some flexibility in the consent to account for uncertainties in specific project details.	The impact assessment within **ES Topic Chapters [APP/6.2]** has been based on the worst-case parameters for each technical topic, and justification is presented within the relevant technical chapter.
	4.3.19 The Secretary of State should consider how the accumulation of, and interrelationship between, effects might affect the environment, economy, or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place.	4.3.19 The Secretary of State should consider how the accumulation of, and interrelationship between, effects might affect the environment, economy, or community as a whole, even though they may be acceptable when considered on an individual basis with mitigation measures in place.	As set out in **ES Chapter 2: EIA Process and Methodology [APP/6.1]**, a Cumulative Effects Assessment (CEA) has been undertaken as part of the EIA in accordance with PINS Advice on Cumulative Effects Assessment (September 2024) and has considered two types of cumulative effects: • In combination effects: the combined effect generated by individual effects on a particular receptor (presented within **ES Chapter 17: In-Combination Effects [APP/6.2]**; and • Cumulative effects: effects generated by the Scheme and other planned or approved developments on the same receptor (presented in **ES Volume 2, Chapters 6 to 16 [APP/6.2]**).
	4.3.22 Given the level and urgency of need for new energy infrastructure, the Secretary of State should, subject to any relevant legal requirements (e.g. under the Habitats Regulations) which indicate otherwise, be guided by the following principles when deciding what weight should be given to alternatives: • the consideration of alternatives in order to comply with policy requirements	4.3.22 Given the level and urgency of need for new energy infrastructure, the Secretary of State should, subject to any relevant legal requirements (e.g. under the Habitats Regulations) which indicate otherwise, be guided by the following principles when deciding what weight should be given to alternatives: • the consideration of alternatives in order to comply with policy	**ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** and **Appendix 1: Site Evaluation Report** to the **Planning Statement [APP/5.5]** describe the detailed site evaluation and assessment of alternatives process undertaken by the Applicant. The assessment in the ES and consideration of policy in the **Planning Statement [APP/5.5]** has been carried out in a proportionate manner. The assessment has also only considered alternatives that can meet the objectives of the Scheme, and sets out why these considered alternatives are not feasible. The assessment considers the locational criteria (environmental, social, economic, and engineering constraints) that geographically influenced the area of search. After selecting the preferred locations for the components of the Scheme, based on the

	should be carried out in a proportionate manner; • only alternatives that can meet the objectives of the Application need to be considered	requirements should be carried out in a proportionate manner; • only alternatives that can meet the objectives of the Application need to be considered	locational criteria and factors mentioned above, the Applicant developed a set of core design principles, which are described in the **Design Approach Document [APP/5.7]**. These have then influenced the optioneering and the identification of a preferred design, which then underwent further technical and feasibility assessments.
	4.3.23 The Secretary of State should be guided in considering alternative proposals by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security, climate change, and other environmental benefits) in the same timescale as the proposed development.	4.3.23 The Secretary of State should be guided in considering alternative proposals by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security, climate change, and other environmental benefits) in the same timescale as the proposed development.	The Applicant notes that the Secretary of State should not refuse an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site. In accordance with this policy is it noted that sites considered as an alternative may be needed for future proposals. A **Site Evaluation Report** has been submitted as part of the DCO Application. **Appendix 1** of the **Planning Statement [APP/5.5]** provides an overview of the site evaluation process, which the Applicant has undertaken, for both the siting of the proposed National Grid Substation and the evaluation of land available for solar development, resulting in the land that is subject to the Scheme being brought forward. The Site's suitability for National Grid Substation and solar development is due to the lack of landscape and environmental statutory designations, limited residential receptors, the absence of BMV on the published “provisional” ALC maps, and the Likelihood of BMV maps and accessibility from a major highway network. The Applicant notes that any alternatives not studied by the Applicant as reflected in **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** and **Appendix 1: Site Evaluation Report** to the **Planning Statement [APP/5.5]** should only be considered to the extent the Secretary of State thinks they are both relevant and important to the decision. The Applicant considers that the assessment of alternatives has been carried out in a proportionate manner and has considered alternatives that can meet the objectives of the Scheme. Section 4.3 of **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** sets out that the Applicant considered factors including, but not limited to, a large enough site area, topography, access and the lack of designations. Having experience and understanding of the surrounding area and requirements for utility-scale solar, it was clear to the Applicant that the Site met their environmental site selection criteria. The Applicant, therefore, had identified a suitable site and concluded their site evaluation process.
	4.3.24 The Secretary of State should not refuse an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site, and 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 .	4.3.24 The Secretary of State should not refuse an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site, and 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.	
	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.	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.	
	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 section 104 of 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.	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 section 104 of 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.	
	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	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	

	important and relevant to the Secretary of State's decision.	excluded on the grounds that they are not important and relevant to the Secretary of State's decision.	
	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.	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.	
	4.3.29 It is intended that potential alternatives to a proposed development should, wherever possible, be identified before an application is made to the Secretary of State (so as to allow appropriate consultation and the development of a suitable evidence base in relation to any alternatives which are particularly relevant). Therefore, where an alternative is first put forward by a third party after an application has been made, the Secretary of State may place the onus on the person proposing the alternative to provide the evidence for its suitability as such and the Secretary of State should not necessarily expect the applicant to have assessed it.	4.3.29 It is intended that potential alternatives to a proposed development should, wherever possible, be identified before an application is made to the Secretary of State (so as to allow appropriate consultation and the development of a suitable evidence base in relation to any alternatives which are particularly relevant). Therefore, where an alternative is first put forward by a third party after an application has been made, the Secretary of State may place the onus on the person proposing the alternative to provide the evidence for its suitability as such and the Secretary of State should not necessarily expect the applicant to have assessed it.	
4.4 Health	4.4.1 Energy infrastructure has the potential to impact on the health and well-being ("health") of the population. Access to energy is clearly beneficial to society and to our health as a whole. However, the construction of energy infrastructure and the production, distribution and use of energy may have negative impacts on some people's health.	4.4.1 Energy infrastructure has the potential to impact on the health and well-being ("health") of the population. Access to energy is clearly beneficial to society and to our health as a whole. However, the construction of energy infrastructure and the production, distribution and use of energy may have negative impacts on some people's health.	**ES Chapter 15: Human Health [APP/6.2]** identifies and proposes measures to address the potential impacts and likely significant effects on human health of the Scheme's construction, operational, and decommissioning. The chapter concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse socio-economic related effects expected across the Scheme's construction, operational and decommissioning phases. There is a significant beneficial effect anticipated on: • Construction jobs for vulnerable groups as a result of the Scheme's construction phase • Provision of education, skills, training and supply chain for vulnerable groups as a result of the Scheme's construction and operational phases • Provision of education, skills, training and supply chain for the general population as a result of the Scheme's operational phase • Physical activity for vulnerable groups as a result of the Scheme's operational phase; and • Decommissioning jobs for vulnerable groups as a result of the Scheme's decommissioning phase. The embedded mitigation measures relevant to potential impacts on health are secured within the **oCEMP [APP/7.6], oESSCS [APP/7.15], oLEMP [APP/7.11],**
	4.4.2 The direct impacts on health may include • increased traffic • air or water pollution • dust, odour • hazardous waste and substances • noise • exposure to radiation, and • increases in pests	4.4.2 The direct impacts on health may include • increased traffic • air or water pollution • dust, odour • hazardous waste and substances • noise • exposure to radiation, and • increases in pests	

	4.4.3 New energy infrastructure may also affect the composition and size of the local population, and in doing so have indirect health impacts, for example if it in some way affects access to key public services, transport, or the use of open space for recreation and physical activity.	4.4.3 New energy infrastructure may also affect the composition and size of the local population, and in doing so have indirect health impacts, for example if it in some way affects access to key public services, transport, or the use of open space for recreation and physical activity.	**oCTMP [APP/7.7]** and the **oDS [APP/7.10],** which are secured via corresponding requirements of the **draft DCO [APP/3.1].** Section 15.11 of **ES Chapter 15: Human Health [APP/6.2]** describes the existing levels and assesses the anticipated cumulative health effects of the Scheme's construction, operation and decommissioning phases. There is a significant beneficial cumulative effect anticipated on: • Construction jobs for vulnerable groups • Provision of education, skills, training and supply chain for the general population and for vulnerable groups as a result of the Scheme's construction phase • Provision of education, skills, training and supply chain for vulnerable groups as a result of the Scheme's operational phase, and • Physical activity for vulnerable groups as a result of the Scheme's operational phase. The **Equality Impact Assessment [APP/7.2]** highlights the following potential impacts: • Impact on existing businesses • Physical activity, PRoW, and open space • Neighbourhood amenity • Local employment, education, training, and upskilling The **Equality Impact Assessment [APP/7.2]** concludes that there is one potential minor adverse disproportionate equality effect identified relating to people of Gypsy, Roma and Traveller ethnicity, due to minor adverse noise effects at the Splashes Campsite (Traveller Site) during the construction phase. Due to several factors, including the very short duration of the effect, the baseline noise levels, and the mitigation measures outlined in the **oCEMP [APP/7.6],** it has been determined that no additional equality specific mitigation is appropriate or required. There are expected moderate and minor beneficial equality effects due to provision of local employment, education, training, and upskilling. Mitigation for the potential impacts highlighted above are mitigated through the **oCEMP [APP/7.6]**, **oDS [APP/7.10]**, **oLEMP [APP/7.11]**, **oPRoWPPMP [APP/7.12]**, and the **oESSCS [APP/7.15]**.
	4.4.4 As described in the relevant sections of this NPS and in the technology specific NPSs, where the proposed project has an effect on humans, the ES should assess these effects for each element of the project, identifying any potential adverse health impacts, and identifying measures to avoid, reduce or compensate for these impacts as appropriate.	4.4.4 As described in the relevant sections of this NPS and in the technology specific NPSs, where the proposed project has an effect on humans, the ES should assess these effects for each element of the project, identifying any potential adverse health impacts, and identifying measures to avoid, reduce or compensate for these impacts as appropriate.	
	4.4.5 The impacts of more than one development may affect people simultaneously, so the applicant should consider the cumulative impact on health in the ES where appropriate.	4.4.5 The impacts of more than one development may affect people simultaneously, so the applicant should consider the cumulative impact on health in the ES where appropriate.	
	4.4.6 Opportunities should be taken to mitigate indirect impacts, by promoting local improvements to encourage health and wellbeing, this includes potential impacts on vulnerable groups within society, i.e., those groups which may be differentially impacted by a development compared to wider society as a whole.	4.4.6 Opportunities should be taken to mitigate indirect impacts, by promoting local improvements to encourage health and wellbeing, this includes potential impacts on vulnerable groups within society, i.e., those groups which may be differentially impacted by a development compared to wider society as a whole.	
	4.4.7 Generally, those aspects of energy infrastructure which are most likely to have a significantly detrimental impact on health are subject to separate regulation (for example for air pollution) which will constitute effective mitigation of them, so that it is unlikely that health concerns will either by themselves constitute a reason to refuse consent or require specific mitigation under the Planning Act 2008.	4.4.7 Generally, those aspects of energy infrastructure which are most likely to have a significantly detrimental impact on health are subject to separate regulation (for example for air pollution) which will constitute effective mitigation of them, so that it is unlikely that health concerns will either by themselves constitute a reason to refuse consent or require specific mitigation under the Planning Act 2008.	
	4.4.8 However, not all potential sources of health impacts will be mitigated in this way and the Secretary of State may want to take account of health concerns when setting requirements relating to a range of impacts such as noise.	4.4.8 However, not all potential sources of health impacts will be mitigated in this way and the Secretary of State may want to take account of health concerns when setting requirements relating to a range of impacts such as noise.	

4.6 Environmental and Biodiversity Net Gain	4.6.1 Environmental net gain is an approach to development that aims to leave the natural environment in a measurably better state than beforehand. Projects should therefore not only avoid, mitigate and compensate harms, following the mitigation hierarchy, but also consider whether there are opportunities for enhancements.	4.6.1 Environmental net gain is an approach to development that aims to leave the natural environment in a measurably better state than beforehand. Projects should therefore not only avoid, mitigate and compensate harms, following the mitigation hierarchy, but also consider whether there are opportunities for enhancements.	**ES Chapter 7: Ecology and Biodiversity [APP/6.2]** sets out that there are no residual effects on ecology and biodiversity identified during the construction and decommissioning of the Scheme. While some moderate adverse residual effects have been identified, mitigation for these is set out in the **oLEMP [APP/7.11]** which is secured by a requirement of the **draft DCO [APP/3.1]**. As a result of embedded and additional mitigation and enhancement measures, there are four direct residual significant (in EIA terms) beneficial effects as a result of the Scheme, which are anticipated in relation to the following ecological features: hedgerows and lines of trees; breeding birds – other species; overwintering birds and amphibians – Great Crested Newt. Furthermore, the **oLEMP [APP/7.11]** sets out the landscaping and ecological mitigation and enhancement measures for the Scheme. The overarching aim of the **oLEMP [APP/7.11]** is to set out prescriptions for habitat creation and management in order to provide ecological enhancements, strengthen the green infrastructure within the local area, and to provide landscape and visual mitigation through screening of the Scheme, where necessary. Measures include planting of hedgerows and trees, woodland copses and shelterbelts, native shrub planting as well as the creation of ground nesting bird mitigation habitat and habitat boxes and wildlife enhancement features such as log piles and hibernacula. Accordingly, these measures will contribute to improvements in natural capital and ecosystem services. As presented in the **Biodiversity Net Gain Assessment Report [APP/7.4],** the ecological mitigation and enhancement areas will deliver a potential net gain of 23.46% for onsite habitats, and a net gain of 58.78% for onsite hedgerow and tree lines while a requirement of the **draft DCO [APP/3.1]** commits to delivering a minimum net gain of 10% for onsite habitats, and a net gain of 10% for onsite hedgerow and tree lines. The **oLEMP [APP/7.11]**, which is also secured by a requirement of the **draft DCO [APP/3.1],** secures the ongoing management and maintenance measures required for the upkeep of the landscape and ecological mitigation. Therefore, the Applicant does not consider there to be a need for the Secretary of State to impose further requirements or conditions in the **draft DCO [APP/3.1]** to secure the Scheme's BNG. Details of the engagement carried out by the Applicant in relation to the Scheme are set out in the **Consultation Report [APP/5.1].** The BNG Assessment for the Scheme has not been shared with the LPAs or NE, principally because surveys to underpin the assessment were ongoing until close to the submission of the DCO Application, and the results could change quite considerably as more survey data is collected. An earlier version of the BNG Assessment was not shared either, due to the uncertainty until the final design was established. As confirmed in Section 1.2 of the **Biodiversity Net Gain Assessment Report [APP/7.4],** the BNG assessment presented within this report follows the guidance set out within Biodiversity Net Gain Report & Audit Templates (Version 1). CIEEM. July 2021. It is also in line with the British Standard 8683:2021 (Process for Designing and Implementing Biodiversity Net Gain). The stages of Scheme design and application of the mitigation hierarchy have followed Biodiversity Net Gain: Good Practice Principles for Development (CIEEM, CIRA, IEMA 2016), where the first principle is the application of the mitigation hierarchy as set out in Section 1.2 of the **Biodiversity Net Gain Assessment Report [APP/7.4]**. The Scheme will meet a
	4.6.2 Biodiversity net gain is an essential component of environmental net gain. Projects in England should consider and seek to incorporate improvements in natural capital, ecosystem services and the benefits they deliver when planning how to deliver biodiversity net gain.	4.6.2 Biodiversity net gain is an essential component of environmental net gain. Projects in England should consider and seek to incorporate improvements in natural capital, ecosystem services and the benefits they deliver when planning how to deliver biodiversity net gain.	
	4.6.6 Energy NSIP proposals, whether onshore or offshore, should seek opportunities to contribute to and enhance the natural environment by providing net gains for biodiversity, and the wider environment where possible.	4.6.6 Energy NSIP proposals, whether onshore or offshore, should seek opportunities to contribute to and enhance the natural environment by providing net gains for biodiversity, and the wider environment where possible.	
	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 outcomes. This calculation data should be presented in full as part of their application.	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 outcomes. This calculation data should be presented in full as part of their application.	
	4.6.8 Where possible, this data should be shared, alongside a completed biodiversity metric calculation, with the Local Authority and Natural England for discussion at the preapplication stage as it can help to highlight biodiversity and wider environmental issues which may later cause delays if not addressed.	4.6.8 Where possible, this data should be shared, alongside a completed biodiversity metric calculation, with the Local Authority and Natural England for discussion at the preapplication stage as it can help to highlight biodiversity and wider environmental issues which may later cause delays if not addressed.	
	4.6.10 Biodiversity net gain should be applied after compliance with the mitigation hierarchy and does not change or replace existing environmental obligations although compliance with those obligations will be relevant to the question of the baseline for assessing net gain and if they deliver an additional enhancement	4.6.10 Biodiversity net gain should be applied after compliance with the mitigation hierarchy and does not change or replace existing environmental obligations.	

	beyond meeting the existing obligation, that enhancement will count towards net gain		minimum 10% BNG, consistent with the terms of the **Biodiversity Net Gain Assessment Report [APP/7.4]** and aligned with the proposals in the **oLEMP [APP/7.11]** to be secured through Requirements 7 and 9 in Schedule 2 to the **draft DCO [APP/3.1]**. There is no biodiversity net gain set to be delivered off-site, and all details of onsite biodiversity net gain are set out in the **Biodiversity Net Gain Assessment Report [APP/7.4]**.
	4.6.11 Biodiversity net gain can be delivered onsite or wholly or partially off-site. We encourage details of any off-site delivery of biodiversity net gain to be set out within the application for development consent.	4.6.11 Biodiversity net gain can be delivered onsite or wholly or partially off-site. We encourage details of any off-site delivery of biodiversity net gain to be set out within the application for development consent.	
	4.6.12 When delivering biodiversity net gain off-site, developments should do this in a manner that best contributes to the achievement of relevant wider strategic outcomes, for example by increasing habitat connectivity, enhancing other ecosystem service outcomes, or considering use of green infrastructure strategies. Reference should be made to relevant national or local plans and strategies, to inform off-site biodiversity net gain delivery. If published, the relevant strategy is the Local Nature Recovery Strategy (LNRS). If an LNRS has not been published, the relevant consenting body or planning authority may specify alternative plans, policies or strategies to use.	4.6.12 When delivering biodiversity net gain off-site, developments should do this in a manner that best contributes to the achievement of relevant wider strategic outcomes, for example by increasing habitat connectivity, enhancing other ecosystem service outcomes, or considering use of green infrastructure strategies. Reference should be made to relevant national or local plans and strategies, to inform off-site biodiversity net gain delivery. If published, the relevant strategy is the Local Nature Recovery Strategy (LNRS). If an LNRS has not been published, the relevant consenting body or planning authority may specify alternative plans, policies or strategies to use.	
	4.6.13 In addition to delivering biodiversity net gain, developments may also deliver wider environmental gains and benefits to communities relevant to the local area, and to national policy priorities, such as • reductions in GHG emissions, • reduced flood risk, • improvements to air or water quality, • climate adaptation, • landscape enhancement, or • increased access to natural greenspace, or • the enhancement, expansion or provision of trees and woodlands. The scope of potential gains will be dependent on the type, scale, and location of specific projects. Applicants should look for a holistic approach to delivering wider environmental	4.6.13 In addition to delivering biodiversity net gain, developments may also deliver wider environmental gains and benefits to communities relevant to the local area, and to national policy priorities, such as • reductions in GHG emissions, • reduced flood risk, • improvements to air or water quality, • climate adaptation, • landscape enhancement, or • increased access to natural greenspace, or • the enhancement, expansion or provision of trees and woodlands. The scope of potential gains will be dependent on the type, scale, and location of specific projects. Applicants should look for a holistic approach to delivering wider	In addition to delivering BNG, the Scheme principally proposes to facilitate the export of a significant amount of low carbon electricity into the National Grid. The Scheme would therefore help the UK to meet carbon reduction commitments by increasing the proportion of electricity supplied by renewable sources. **ES Chapter 13: Climate Change [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, a significant residual beneficial effect on global climate across the Scheme's operational phase. The embedded and additional mitigation measures are documented within the **oCEMP [APP/7.6]**, **oOEMP [APP/7.8]**, **and oDS [APP/7.10]** and secured via a requirement of the **draft DCO [APP/3.1]**. Section 5.3 of the **Planning Statement [APP/5.5]** sets out the full list of other benefits beyond making a significant contribution to the UK's meeting of policy commitments and legal decarbonisation targets that arise from the Scheme. These benefits occur across different stages of the Scheme's lifetime.

	gains and benefits through the use of nature-based solutions and Green Infrastructure.	environmental gains and benefits through the use of nature-based solutions and Green Infrastructure.	
	4.6.14 The Environment Act 2021 mandated the preparation of Local Nature Recovery Strategies (LNRSs) across England. They are a new system of spatial strategies for nature recovery and will play a major role in providing detail on the best locations to create, enhance and restore nature and deliver wider environmental benefits. LNRSs will also agree priorities for nature recovery and map the most valuable existing areas for nature. They will be critical in delivering new government targets for species abundance and habitat creation commitments, as well as other pressing environmental outcomes for water and flood risk, carbon and tree planting and woodland creations. LNRSs will also drive the creation of a Nature Recovery Network (NRN), a major commitment in the government's 25 Year Environment Plan.	4.6.14 The Environment Act 2021 mandated the preparation of Local Nature Recovery Strategies (LNRSs) across England. They are a new system of spatial strategies for nature recovery and will play a major role in providing detail on the best locations to create, enhance and restore nature and deliver wider environmental benefits. LNRSs will also agree priorities for nature recovery and map the most valuable existing areas for nature. They will be critical in delivering government targets for species abundance and habitat creation commitments, as well as other pressing environmental outcomes for water and flood risk, carbon and tree planting and woodland creations. LNRSs will also drive the creation of a Nature Recovery Network (NRN), a major commitment in the government's Environmental Improvement Plan.	
	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.	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.	Opportunities to deliver wider environmental gains are outlined on a topic-by-topic basis in the relevant sections of the **ES [APP/6.1 – 6.5]** and the **oLEMP [APP/7.11].** The **Design Approach Document [APP/5.7]** demonstrates how the design of the Scheme has been developed in accordance with a clear design framework, based on the criteria for good design set out in NPS EN-1. This has included the adoption of project level design principles (Project Principles) to guide decision making and embed good design outcomes to the Scheme.
	4.6.17 Where environmental net gain considerations have featured as part of the strategic options appraisal process to select a project, applicants should reference that information to supplement the site-specific details.	4.6.17 Where environmental net gain considerations have featured as part of the strategic options appraisal process to select a project, applicants should reference that information to supplement the site-specific details.	Throughout the design process, the Applicant maintained an interdisciplinary approach to design, considering both the opportunities and constraints of the Scheme. This included an analysis of the existing physical, environmental, social, and cultural context of the Site by a broad range of technical disciplines (including landscape and visual, noise, ecology, and heritage) as set out and assessed by **ES Topic Chapters [APP/6.2].** Section 4.3 of **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** sets out that a key principle of site selection is avoiding areas with particular environmental and landscape sensitivity to minimize potential impacts. Furthermore, Section 8.2 of the **Planning Statement [APP/5.5]** which includes **Appendix 1: Site Evaluation Report**, also sets out how consideration of reasonable alternatives to avoid significant harm to biodiversity and geological conservation is also part of the appraisal process. Through the **Design Approach Document [APP/5.7]**, **Biodiversity Net Gain Report [APP/7.4]**, and the **oLEMP [APP/7.11]** the Applicant has demonstrated a commitment to delivering a minimum net gain of 10% for onsite habitats, and a net gain of 10% for onsite hedgerow and tree lines.

4.7 Criteria for "good design" in energy infrastructure	4.7.1 The visual appearance of a building, structure, or piece of infrastructure, and how it relates to the landscape it sits within, is sometimes considered to be the most important factor in good design. But high quality and inclusive design goes far beyond aesthetic considerations. The functionality of an object - be it a building or other type of infrastructure - including fitness for purpose and sustainability, is equally important.	4.7.1 The visual appearance of a building, structure, or piece of infrastructure, and how it relates to the landscape it sits within, is sometimes considered to be the most important factor in good design. But high quality and inclusive design goes far beyond aesthetic considerations. The functionality of an object – be it a building or other type of infrastructure – including fitness for purpose and sustainability, is equally important.	As detailed in Section 2 of the **Planning Statement [APP/5.5]**, good design has been a fundamental consideration from the outset of the Scheme. The **Design Approach Document [APP/5.7]** demonstrates how the design of the Scheme has been developed in accordance with a clear design framework, based on the criteria for good design set out in NPS EN-1. This has included the adoption of project level design principles (Project Principles) to guide decision making and embed good design outcomes to the Scheme. Throughout the design process, the Applicant maintained an interdisciplinary approach to design, considering 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). While it is acknowledged through this policy that the nature of energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area, the Scheme has been designed to be sensitive to place in accordance with this policy. A key principle in the site selection process was to seek to avoid areas of particular environmental and landscape sensitivity where possible to minimise potential impacts. This is true from a natural and built environment perspective including ecology and biodiversity, landscape, water resources, and cultural heritage. As detailed in the **Design Approach Document [APP/5.7],** a Design Champion has been appointed to ensure that good design is embedded into the Scheme, advocating a good practice design approach and sharing lessons learned. In addition to the Applicant's board-level Design Champion, the Applicant also appointed a project-level Design Champion to lead the design process and ensure a multi-disciplinary approach. The appointed Design Champion for the Scheme was the landscape architect, who has prior experience in leading the design of other DCO solar projects. The project level Design Champion was responsible for leading the development of the indicative masterplans presented at the Preliminary Environmental Information Report (PEIR) stage and subsequent iterations following feedback received during statutory consultation, resulting in the Indicative Masterplans submitted with this DCO. These plans outline the site layout and proposed mitigation for the Scheme, which has been developed in close coordination with the Applicant's design team. Section 3 of **Design Principles, Parameters and Commitments [APP/5.8]** sets out the parameters and commitments for the Scheme that the detailed design must accord with as per Requirement 5 of the **draft DCO [APP/3.1]**. The project level design principles that have informed the Scheme design are set out within the **Design Approach Document [APP/5.7]**. As detailed in the **Design Approach Document [APP/5.7]** and the Planning Statement, the Scheme has undergone an iterative design process which has resulted in the delivery of a functional and efficient Scheme design which will deliver large amounts of renewable and low carbon energy while being sensitive to local context and surroundings, and minimising impacts on the environment as far as practicable. As recognised within the design policies set out in the NPSs, the context of any design decisions must reflect the need to efficiently deliver large scale renewable energy infrastructure and therefore the extent to which a Scheme is able to enhance the quality of the local area may be limited. The Scheme has undergone a site selection process as detailed in **ES Chapter 4: Reasonable Alternatives and Design Evolution**
	4.7.2 Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is acknowledged, however that the nature of energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area.	4.7.2 Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is acknowledged, however that the nature of energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area.	
	4.7.3 Good design is also a means by which many policy objectives in the NPSs can be met, for example the impact sections show how good design, in terms of siting and use of appropriate technologies, can help mitigate adverse impacts such as noise. Projects should look to use modern methods of construction and sustainable design practices such as use of sustainable timber and low carbon concrete. Where possible, projects should include the reuse of material.	4.7.3 Good design is also a means by which many policy objectives in the NPSs can be met, for example the impact sections show how good design, in terms of siting and use of appropriate technologies, can help mitigate adverse impacts such as noise. Projects should look to use modern methods of construction and sustainable design practices such as use of sustainable timber and low carbon concrete. Where possible, projects should include the reuse of material.	
	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.	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.	
	4.7.5 To ensure good design is embedded within the project development, a project board level design champion could be appointed, and a representative design panel used to maximise the value provided by the infrastructure. Design principles should be established from the outset of the project to guide the development from	4.7.5 To ensure good design is embedded within the project development, a project board level design champion could be appointed, and a representative design panel used to maximise the value provided by the infrastructure. Design principles should be established from the outset of the	

	conception to operation. Applicants should consider how their design principles can be applied postconsent.	project to guide the development from conception to operation. Applicants should consider how their design principles can be applied postconsent.	**[APP/6.1]**, and has adopted relevant design principles that enhance the environment within which it is located.
	4.7.6 Whilst the applicant may not have any or very limited choice in the physical appearance of some energy infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting relative to existing landscape character, land form and vegetation. Furthermore, the design and sensitive use of materials in any associated development such as electricity substations will assist in ensuring that such development contributes to the quality of the area. Applicants should also, so far as is possible, seek to embed opportunities for nature inclusive design within the design process.	4.7.6 Whilst the applicant may not have any or very limited choice in the physical appearance of some energy infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting relative to existing landscape character, landform and vegetation. Furthermore, the design and sensitive use of materials in any associated development such as electricity substations will assist in ensuring that such development contributes to the quality of the area. Applicants should also, so far as is possible, seek to embed opportunities for nature inclusive design within the design process.	
	4.7.7 Applicants must demonstrate in their application documents how the design process was conducted and how the proposed design evolved. Where a number of different designs were considered, applicants should set out the reasons why the favoured choice has been selected.	4.7.7 Applicants must demonstrate in their application documents how the design process was conducted and how the proposed design evolved. Where a number of different designs were considered, applicants should set out the reasons why the favoured choice has been selected.	As part of the approach to EIA, an iterative approach has been adopted where significant environmental effects have been avoided where possible through design refinements and iterations, as detailed further within **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1].** The **Design Approach Document [APP/5.7]**, which sets out, in detail, the Applicant's actions and decisions to demonstrate compliance with design-related policy in NPS EN-1, NPS EN-3 and the Planning Inspectorate's Advice on Good Design.
	4.7.8 Applicants should consider taking independent professional advice on the design aspects of a proposal. In particular, the Design Council can be asked to provide design review for nationally significant infrastructure projects and applicants are encouraged to use this service. Applicants should also consider any design guidance developed by the local planning authority.	4.7.8 Applicants should consider taking independent professional advice on the design aspects of a proposal. In particular, the Design Council can be asked to provide design review for nationally significant infrastructure projects and applicants are encouraged to use this service. Applicants should also consider any design guidance developed by the local planning authority.	Pre-application consultation and engagement were key features of the evolution of the Scheme, enabling continuous improvements to the Applicant's proposals. This included consultation and engagement on the design principles which have guided the design of the Scheme. In parallel with three phases of formal pre-application consultation on the proposals, the Applicant conducted a programme of stakeholder engagement to gain feedback on the design of the Scheme. This included ongoing meetings with a number of stakeholders. The Applicant engaged with specialist and technical officers from Natural England during the pre-application stage of the Scheme. In light of the extensive consultation and engagement, the Applicant did not undertake an independent design review of the Scheme, which is consistent with the approach taken by other consented DCO solar schemes. The Applicant has not sought independent design review given the design of the Scheme has evolved through input from a team of experienced solar NSIPs professionals including highways engineers, planners, landscape architects, ecologists, heritage specialists and other relevant environmental professionals.

	4.7.9 Further advice on what applicants should demonstrate by way of good design is provided in the technology specific NPSs where relevant.	4.7.9 Further advice on what applicants should demonstrate by way of good design is provided in the technology specific NPSs where relevant.	The Scheme's compliance with the NPSs is considered in Tables 1-3 of this **Policy Compliance Document [APP/5.6].**
	4.7.10 In the light of the above and given the importance which the Planning Act 2008 places on good design and sustainability, the Secretary of State needs to be satisfied that energy infrastructure developments are sustainable and, having regard to regulatory and other constraints, are as attractive, durable, and adaptable (including taking account of natural hazards such as flooding) as they can be.	4.7.10 In the light of the above and given the importance which the Planning Act 2008 places on good design and sustainability, the Secretary of State needs to be satisfied that energy infrastructure developments are sustainable and, having regard to regulatory and other constraints, are as attractive, durable, and adaptable (including taking account of natural hazards such as flooding) as they can be.	The **Design Approach Document [APP/5.7]** has been structured around four stages of the design process, as set out in non-statutory guidance provided by the Planning Inspectorate entitled "Nationally Significant Infrastructure Projects: Advice on Good Design". The advice is intended to complement the legislation, regulations and guidance issued by the government and is produced under section 51 of the Planning Act 2008. Section 4.3 of **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** sets out that a key principle of site selection is avoiding areas with particular environmental and landscape sensitivity to minimise potential impacts. Section 4.5 also outlines the sustainable nature of the Scheme through its opportunities to deliver biodiversity net gain, flood risk improvements, and tree enhancement of existing hedgerows, in line with local conservation priorities and national targets. Furthermore, Section 8.2 of the **Planning Statement [APP/5.5]** which includes **Appendix 1: Site Evaluation Report**, also sets out how environmental and planning factors have been taken into account from the outset to avoid and reduce impacts. The Scheme has undergone an iterative design process, which has resulted in the delivery of a functional and efficient Scheme design which will deliver large amounts of renewable and low carbon energy while being sensitive to local context and surroundings, and minimising impacts on the environment as far as practicable.
	4.7.11 In doing so, the Secretary of State should be satisfied that the applicant has considered both functionality (including fitness for purpose and sustainability) and aesthetics (including its contribution to the quality of the area in which it would be located, any potential amenity benefits, and visual impacts on the landscape or seascape) as far as possible.	4.7.11 In doing so, the Secretary of State should be satisfied that the applicant has considered both functionality (including fitness for purpose and sustainability) and aesthetics (including its contribution to the quality of the area in which it would be located, any potential amenity benefits, and visual impacts on the landscape or seascape) as far as possible.	As detailed in Section 2 of the **Planning Statement [APP/5.5]**, good design has been a fundamental consideration from the outset of the Scheme. The **Design Approach Document [APP/5.7]** demonstrates how the design of the Scheme has been developed in accordance with a clear design framework, based on the criteria for good design set out in NPS EN-1. This has included the adoption of project level design principles (Project Principles) to guide decision making and embed good design outcomes to the Scheme. Throughout the design process, the Applicant maintained an interdisciplinary approach to design, considering 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). **ES Chapter 6: Landscape and Visual [APP/6.2]** sets out that during the construction, operation, and decommissioning of the Scheme the Applicant anticipates a major-moderate to moderate adverse residual significant effect on the landscape and visual impacts of and surrounding the Scheme. The embedded and additional mitigation measures are documented within the **oCEMP [APP/7.6]**, **oOEMP [APP/7.8]**, **oDS [APP/7.10]**, and **oLEMP [APP/7.11]** and secured via a requirement of the **draft DCO [APP/3.1]**. The extensive planting proposed throughout the Site, as part of the **Appendix 1: Green Infrastructure Strategy Plans** to the **oLEMP [APP/7.11]**, would provide long term beneficial effects upon the landscape fabric of the Site itself. New planting and
	4.7.12 In considering applications, the Secretary of State should take into account the ultimate purpose of the infrastructure and bear in mind the operational, safety and security requirements which the design has to satisfy. Many of the wider impacts of a development, such as landscape and environmental impacts, will be important factors in the design process.	4.7.12 In considering applications, the Secretary of State should take into account the ultimate purpose of the infrastructure and bear in mind the operational, safety and security requirements which the design has to satisfy. Many of the wider impacts of a development, such as landscape and environmental impacts, will be important factors in the design process.	

			maintenance regimes outlined within the **oLEMP [APP/7.11]** would both serve to increase the sense of enclosure within the central plateau landscape. In the long term, hedgerow would be maintained to 3m in height as a minimum, with gaps infilled and additional trees planted within them, where appropriate. In the long term, the droves would become more enclosed as new planting matures and serves to reinforce the existing hedgerow and tree belts within the Site. Mitigation to address operational battery safety and security of the Scheme are set out through the **outline Battery Safety Management Plan (oBSMP) [APP/7.14].** The plan concludes that, as far as reasonably practicable and for this planning stage of the Scheme, that currently foreseeable hazards associated with the equipment have been identified, and these will be developed and managed throughout the life of the installation and added to as necessary as the Scheme develops and will be reported on regularly.
	4.7.13 The Secretary of State should consider such impacts under the relevant policies in this NPS. Assessment of impacts must be for the stated design life of the Application rather than a shorter time period.	4.7.13 The Secretary of State should consider such impacts under the relevant policies in this NPS. Assessment of impacts must be for the stated design life of the Application rather than a shorter time period.	The Scheme's compliance with the NPSs is considered in Tables 1-3 of this **Policy Compliance Document [APP/5.6].**
	4.7.15 Further advice on what the Secretary of State should expect applicants to demonstrate by way of good design is provided in the technology specific NPSs where relevant.	4.7.15 Further advice on what the Secretary of State should expect applicants to demonstrate by way of good design is provided in the technology specific NPSs where relevant.	
4.10 Climate Change Adaption and Resilience	4.10.1 Whilst we must continue to accelerate efforts to end our contribution to climate change by reaching Net Zero greenhouse gas emissions, adaptation is also necessary to manage the impacts of current and future climate change. If new energy infrastructure is not sufficiently resilient against the possible impacts of climate change, it will not be able to satisfy the energy needs as outlined in Part 3 of this NPS.	4.10.1 Whilst we must continue to accelerate efforts to end our contribution to climate change by reaching Net Zero greenhouse gas emissions, adaptation is also necessary to manage the impacts of current and future climate change. If new energy infrastructure is not sufficiently resilient against the possible impacts of climate change, it will not be able to satisfy the energy needs as outlined in Part 3 of this NPS.	The Climate Change factors assessed for this Scheme are included in Section 13.6 of **ES Chapter 13: Climate Change [APP/6.2],** which provides factors for In-combination Climate Change Impact (ICCI) assessment: • Precipitation change, increased risk of flooding, and reduced drainage • Impact on species and habitats • Greenhouse gas emissions from vehicle movements; and • Changing of dryness and soil quality. Embedded mitigation to limit the effects of these factors is included within Section 13.8 of **ES Chapter 13: Climate Change [APP/6.2]**: • Reducing waste through measures such as increasing recyclability by separating construction waste to be re-used and recycled where reasonably practicable • Adopting the Considerate Constructors Scheme (CCS) to assist in reducing pollution, including GHGs, from the Scheme by employing good industry practice measures • Regular planned maintenance of the construction plant and machinery to optimise efficiency • Retention of existing vegetation
	4.10.2 Climate change is already altering the UK's weather patterns and this will continue to accelerate depending on global carbon emissions. This means it is likely there will be more extreme weather events. As well as climatic and seasonal changes such as hotter, drier summers and warmer, wetter winters, there is also a likelihood of increased flooding, drought, heatwaves, and intense rainfall events, as well as rising sea levels, increased storms and coastal change. Adaptation is therefore	4.10.2 Climate change is already altering the UK's weather patterns and this will continue to accelerate depending on global carbon emissions. This means it is likely there will be more extreme weather events. As well as climatic and seasonal changes such as hotter, drier summers and warmer, wetter winters, there is also a likelihood of increased flooding, drought, heatwaves, and intense rainfall events, as well as rising sea levels, increased storms and coastal change. Adaptation is therefore necessary	

	necessary to deal with the potential impacts of these changes that are already happening.	to deal with the potential impacts of these changes that are already happening.	• Use of low carbon modes of transport, such as communicating bus, pedestrian, and cycling connections • Switching off vehicles and the plant when not in use to ensure construction vehicles conform to current EU emissions standards adopted by the UK • Implementing a shuttlebus to transport employees to the sites, which would reduce the number of construction staff trips • Measures to mitigate against flood risk such as locating the most electrically sensitive infrastructure outside of Flood Zones 2 and 3 to mitigate against the risk of flooding • Using cooling systems and adapting working practices and equipment used based on weather conditions • Measures to protect workers and resources from extreme weather conditions • Monitoring forecasts and the news for Environment Agency flood warnings and relevant weather warnings; and • BESS systems would include heating, ventilation and cooling systems. **ES Chapter 13: Climate Change [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, a significant residual beneficial effect on global climate across the Scheme. As set out in **ES Chapter 12: Water Resources [APP/6.2]** and **ES Appendix 12.2: Flood Risk Assessment (FRA) [APP/6.4],** the Scheme does not have a significant effect on flood risk. As detailed in the **oCEMP [APP/7.6],** the Contractor will monitor weather forecasts and Environment Agency flood warnings to plans works accordingly, protecting workers and resources from any extreme weather related to heavy precipitation and flooding. The **oOEMP [APP/7.8]** secures the measure to mitigate against flood risk, all sensitive and electrical equipment on the solar PV panel will be elevated by legs or mounted on raised frames. There will also be a fire suppression system on site to mitigate against drier and hotter conditions. The **oOEMP [APP/7.8]** sets out that BESS systems would include Heating, Ventilation, and Air Conditioning (HVAC) systems to prevent overheating, particularly during increased summer temperatures. Workers and staff will also check forecasts and plan works accordingly. Section 13.9 of **ES Chapter 13: Climate Change [APP/6.2]** also sets out that water will be stored on site for fire suppression. Table 13.37 in **ES Chapter 13: Climate Change [APP/6.1]** states that water will be stored on site for fire suppression in the event of water shortages. Furthermore, Section 13.9 of **ES Chapter 13: Climate Change [APP/6.1]** has accounted for the use of water during the construction phase and the carbon emissions this would release. This section also outlines the emissions expected during each phase of the lifespan of the development and determines that there is a minor adverse effect on the climate which is not significant.
	4.10.3 To support planning decisions, the government produces a set of UK Climate Projections as well as hazard-specific tools and guidance like the Environment Agency's climate change allowances for flood risk assessments.. In addition, the government's National Adaption Programme and Adaptation Reporting Power will ensure that reporting authorities (a defined list of public bodies and statutory undertakers, including energy utilities) assess the risks to their organisation presented by climate change.	4.10.3 To support planning decisions, the government produces a set of UK Climate Projections as well as hazard-specific tools and guidance like the EA's climate change allowances for flood risk assessments. In addition, the government's National Adaptation Programme and Adaptation Reporting Power126 will ensure that reporting authorities (a defined list of public bodies and statutory undertakers, including energy utilities) assess the risks to their organisation presented by climate change.	
	4.10.4 The generic impacts advice in this NPS and the technology specific advice on impacts in the other energy NPSs provide additional information on climate change adaptation and should be read alongside this section. (Section 5.3 on greenhouse gas emissions, Section 5.6 on coastal change and Section 5.8 on flood risk in particular provide relevant guidance for consideration).	4.10.4 The generic impacts advice in this NPS and the technology specific advice on impacts in the other energy NPSs provide additional information on climate change adaptation and should be read alongside this section. (Section 5.3 on greenhouse gas emissions, Section 5.6 on coastal change and Section 5.8 on flood risk in particular provide relevant guidance for consideration).	
	4.10.5 In certain circumstances, measures implemented to ensure a scheme can adapt to climate change may give rise to additional impacts, for example as a result of protecting against flood risk, there may be consequential impacts on coastal change. In preparing measures to support climate change adaptation applicants should take reasonable steps to maximise the use of nature-based solutions alongside other conventional techniques.	4.10.5 In certain circumstances, measures implemented to ensure a scheme can adapt to climate change may give rise to additional impacts, for example as a result of protecting against flood risk, there may be consequential impacts on coastal change. In preparing measures to support climate change adaptation applicants should take reasonable steps to maximise the use of nature-based solutions alongside other conventional techniques.	
	4.10.6 Integrated approaches, such as looking across the water cycle, considering coordinated management of water storage, supply, demand, wastewater, and flood risk can provide further benefits to address multiple infrastructure needs, as well as carbon sequestration benefits.	4.10.6 Integrated approaches, such as looking across the water cycle, considering coordinated management of water storage, supply, demand, wastewater, and flood risk can provide further benefits to address multiple infrastructure needs, as well as carbon sequestration benefits.	
	4.10.7 In addition to avoiding further GHG emissions when compared with more traditional adaptation approaches, nature-based solutions can also result in biodiversity benefits and net	4.10.7 In addition to avoiding further GHG emissions when compared with more traditional adaptation approaches, nature-based solutions can also result in biodiversity benefits and net gain, as well as	**ES Chapter 13: Climate Change [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, a significant residual beneficial effect on global climate across the Scheme's operational phase. The embedded and additional mitigation measures are documented within the **oCEMP [APP/7.6]**, **oOEMP**

	gain, as well as increasing absorption of carbon dioxide from the atmosphere.	increasing absorption of carbon dioxide from the atmosphere.	**[APP/7.8]**, **and oDS [APP/7.10]** and secured via corresponding requirements of the **draft DCO [APP/3.1]**. The Scheme also includes nature-based solutions as set out in the **oLEMP [APP/7.11].** This consists of targeted planting of trees, shrubs, and grassland as well as the management of them to improve biodiversity in and around the Scheme.
	4.10.8 New energy infrastructure will typically be a long-term investment and will need to remain operational over many decades, in the face of a changing climate. Consequently, applicants must consider the direct (e.g. site flooding, limited water availability, storms, heatwave and wildfire threats to infrastructure and operations) and indirect (e.g. access roads or other critical dependencies impacted by flooding, storms, heatwaves or wildfires) impacts of climate change when planning the location, design, build, operation and, where appropriate, decommissioning of new energy infrastructure.	4.10.8 New energy infrastructure will typically be a long-term investment and will need to remain operational over many decades, in the face of a changing climate. Consequently, applicants must consider the direct (e.g. site flooding, limited water availability, storms, heatwave and wildfire threats to infrastructure and operations) and indirect (e.g. access roads or other critical dependencies impacted by flooding, storms, heatwaves or wildfires) impacts of climate change when planning the location, design, build, operation and, where appropriate, decommissioning of new energy infrastructure.	Section 13.9 of **ES Chapter 13: Climate Change [APP/6.2],** the Applicant sets out consideration for the direct and indirect impacts of climate change. As detailed in the **oCEMP [APP/7.6],** the Contractor will monitor weather forecasts and Environment Agency flood warnings to plans works accordingly, protecting workers and resources from any extreme weather related to heavy precipitation and flooding. As set out in **ES Chapter 12: Water Resources [APP/6.2]** and the **FRA [APP/6.4],** the Scheme does not have a significant effect on flood risk. The **oOEMP [APP/7.8]** secures the measure to mitigate against flood risk, all sensitive and electrical equipment on the PV panel will be elevated by legs or mounted on raised frames. There will also be a fire suppression system on site to mitigate against drier and hotter conditions. The **oOEMP [APP/7.8]** sets out that BESS systems would include Heating, Ventilation, and Air Conditioning (HVAC) systems to prevent overheating, particularly during increased summer temperatures. Workers and staff will also check forecasts and plan works accordingly. Section 13.9 of **ES Chapter 13: Climate Change [APP/6.2]** also sets out that water will be stored on site for fire suppression. Table 13.37 in **ES Chapter 13: Climate Change [APP/6.2]** states that water will be stored on site for fire suppression in the event of water shortages. Furthermore, Section 13.9 of **ES Chapter 13: Climate Change [APP/6.2]** has accounted for the use of water during the construction phase and the carbon emissions this would release. This section also outlines the emissions expected during each phase of the lifespan of the development and determines that there is a minor adverse effect on the climate, which is not significant.
	4.10.9 The ES should set out how the proposal will take account of the projected impacts of climate change, using government guidance and industry standard benchmarks such as the Climate Change Allowances for Flood Risk Assessments, Climate Impacts Tool, and British Standards for climate change adaptation, in accordance with the EIA Regulations.	4.10.9 The ES should set out how the proposal will take account of the projected impacts of climate change, using government guidance and industry standard benchmarks such as the Climate Change Allowances for Flood Risk Assessments, Climate Impacts Tool, and British Standards for climate change adaptation, in accordance with the EIA Regulations.	Section 13.3 of **ES Chapter 13: Climate Change [APP/6.2]** sets out the legislation, planning policy and guidance relevant to the climate change assessment including, but not limited to taking into account the recommendations in the IEMA's 'Guide to Assessing Greenhouse Gas Emissions and Evaluating their Significance' and has been adapted to ensure the assessment is proportionate to the Scheme.
	4.10.10 Applicants should assess the impacts on and from their proposed energy project across a range of climate change scenarios, in line with appropriate expert advice and guidance available at the time.	4.10.10 Applicants should assess the impacts on and from their proposed energy project across a range of climate change scenarios, in line with appropriate expert advice and guidance available at the time.	Section 13.9 of **ES Chapter 13: Climate Change [APP/6.2]** sets out the potential impacts of climate change the Scheme may face, including low/high precipitation, high temperatures, and an increase in storm intensity. Section 13.9 of **ES Chapter 13: Climate Change [APP/6.2]** also highlights that the greatest risk of in-combination effects is the increasing in flooding, however, given the nature of the Scheme the only significant increases in run-off as a result of

			impermeable surfaces is at the Customer Substation, National Grid Substation, and BESS areas. Mitigation by design has been embedded in the Scheme. Furthermore, Section 13.9 of **ES Chapter 13: Climate Change [APP/6.2]** sets out that the Scheme itself will reduce national GHG emissions and help to mitigate the effects of climate change, and as such is not anticipated to have a significant in combination effect on species and habitats.
	4.10.11 Applicants should demonstrate that proposals have a high level of climate resilience built-in from the outset and should also demonstrate how proposals can be adapted over their predicted lifetimes to remain resilient to a credible maximum climate change scenario. These results should be considered alongside relevant research which is based on the climate change projections.	4.10.11 Applicants should demonstrate that proposals have a high level of climate resilience built-in from the outset and should also demonstrate how proposals can be adapted over their predicted lifetimes to remain resilient to a credible maximum climate change scenario. These results should be considered alongside relevant research which is based on the climate change projections.	Embedded mitigation to build climate resilience into the Scheme is included within Section 13.8 of **ES Chapter 13: Climate Change [APP/6.2]**: • Reducing waste through measures such as increasing recyclability by separating construction waste to be re-used and recycled where reasonably practicable • Adopting the Considerate Constructors Scheme (CCS) to assist in reducing pollution, including GHGs, from the Scheme by employing good industry practice measures • Regular planned maintenance of the construction plant and machinery to optimise efficiency • Retention of existing vegetation • Use of low carbon modes of transport, such as communicating bus, pedestrian, and cycling connections • Switching off vehicles and the plant when not in use to ensure construction vehicles conform to current EU emissions standards adopted by the UK • Implementing a shuttlebus to transport employees to the sites which would reduce the number of construction staff trips • Measures to mitigate against flood risk such as locating the most electrically sensitive infrastructure outside of Flood Zones 2 and 3 to mitigate against the risk of flooding • Using cooling systems and adapting working practices and equipment used based on weather conditions • Measures to protect workers and resources from extreme weather conditions • Monitoring forecasts and the news for Environment Agency flood warnings and relevant weather warnings; and • BESS systems would include heating, ventilation and cooling systems. Section 13.9 of **ES Chapter 13: Climate Change [APP/6.2]** sets out the mitigation measures included within the **oCEMP [APP/7.6], oOEMP [APP/7.8]**, and **oDS [APP/7.10]** which are adaptable to each climate change scenario assessed.
	4.10.12 Where energy infrastructure has safety critical elements, the applicant should apply a credible maximum climate change scenario. It is appropriate to take a risk-averse approach with elements of infrastructure which are critical to the safety of its operation.	4.10.12 Where energy infrastructure has safety critical elements, the applicant should apply a credible maximum climate change scenario. It is appropriate to take a risk-averse approach with elements of infrastructure which are critical to the safety of its operation.	The Scheme is to be operational for a period of up to 60 years. Climate projections from UKCP18 for the period up to 2070 (which is the year the Scheme is anticipated to be decommissioned) have used the Representative Concentration Pathway (RCP) 8.5 – high emissions scenario. This represents a maximum credible scenario. The Assessment has been prepared taking into account the latest guidance set out in IEMA's (2020) 'Guide to Climate Change Resilience and Adaptation'.

	4.10.13 The Secretary of State should be satisfied that applicants for new energy infrastructure have taken into account the potential impacts of climate change using the latest UK Climate Projections and associated research and expert guidance (such as the EA's Climate Change Allowances for Flood Risk Assessments or the Welsh Government's Climate change allowances and flood consequence assessments) available at the time the ES was prepared to ensure they have identified appropriate mitigation or adaptation measures. This should cover the estimated lifetime of the new infrastructure, including any decommissioning period.	4.10.13 The Secretary of State should be satisfied that applicants for new energy infrastructure have taken into account the potential impacts of climate change using the latest UK Climate Projections and associated research and expert guidance (such as the EA's Climate Change Allowances for Flood Risk Assessments or the Welsh Government's Climate change allowances and flood consequence assessments) available at the time the ES was prepared to ensure they have identified appropriate mitigation or adaptation measures. This should cover the estimated lifetime of the new infrastructure, including any decommissioning period.	**ES Chapter 13: Climate Change [APP/6.2]** confirms that the climate resilience review has provided a description of how the Scheme will be impacted by climate change and how it is designed to be more resilient to the impacts identified during the review of the UK Climate Projections 2018 (UKCP18) data. The Scheme's design and integrated mitigation measures effectively address climate change risks.**ES Chapter 13: Climate Change [APP/6.2]** provides a description of how the Scheme will be affected by climate change impacts, taking into consideration the embedded mitigation measures that have been designed into the Scheme so that it will be more resilient to the impacts identified during the review of the UK Climate Projections 2018. Mitigation measures, including the use of lower carbon and more change resilient methods in the construction, operation and maintenance and decommissioning of the Scheme, are set out in the **oCEMP [APP/7.6]**, **oOEMP [APP/7.8]**, and **oDS [APP/7.10]** and secured via corresponding requirements of the **draft DCO [APP/3.1].**
	4.10.15 The Secretary of State should be satisfied that there are not features of the design of new energy infrastructure critical to its operation which may be seriously affected by more radical changes to the climate beyond that projected in the latest set of UK climate projections, taking account of the latest credible scientific evidence on, for example, sea level rise (for example by referring to additional maximum credible scenarios – i.e. from the Intergovernmental Panel on Climate Change or EA) and that necessary action can be taken to ensure the operation of the infrastructure over its estimated lifetime.	4.10.15 The Secretary of State should be satisfied that there are not features of the design of new energy infrastructure critical to its operation which may be seriously affected by more radical changes to the climate beyond that projected in the latest set of UK climate projections, taking account of the latest credible scientific evidence on, for example, sea level rise (for example by referring to additional maximum credible scenarios – i.e. from the Intergovernmental Panel on Climate Change or EA) and that necessary action can be taken to ensure the operation of the infrastructure over its estimated lifetime.	Sections 13.8 and 13.9 of **ES Chapter 13: Climate Change [APP/6.2]** set out extensive embedded mitigation to deal with the impacts of even the most extreme effects of climate change. Furthermore, Section 13.2 of **ES Chapter 13: Climate Change [APP/6.2]** sets out that significant effects associated with sea level rise have been scoped out in agreement with the Inspectorate on the basis that the Scheme is approximately 25km from the coast. The **oOEMP [APP/7.8**] sets out measures to ensure the operation of infrastructure over its estimated lifetime, including: • BESS systems would include HVAC systems, and these would be contained within the individual equipment containers • Workers and staff to forecasts and plan works accordingly • All sensitive and electrical equipment on the PV panel will be elevated by legs or mounted on raised frames • Water expected to be stored on site for fire suppression • Water management measures to control surface water run-off and drain hardstanding and other structures; and • Fire suppression system on site to rapidly action in case of fire. Section 13.8 of **ES Chapter 13: Climate Change [APP/6.2]** sets out that mitigation measures will be implemented at the time of construction, and that the assessed impacts of climate change have been addressed with embedded mitigation throughout the lifetime of the development.
	4.10.16 If any adaptation measures give rise to consequential impacts (for example on flooding, water resources or coastal change) the Secretary of State should consider the impact of the latter in relation to the application as a whole and the impacts guidance set out in Part 5 of this NPS.	4.10.16 If any adaptation measures give rise to consequential impacts (for example on flooding, water resources or coastal change) the Secretary of State should consider the impact of the latter in relation to the application as a whole and the impacts guidance set out in Part 5 of this NPS.	
	4.10.17 Any adaptation measures should be based on the latest set of UK Climate Projections, the government's latest UK Climate Change Risk Assessment, when available and in consultation with the EA's Climate Change Allowances for Flood Risk Assessments or the Welsh Government's Climate change allowances and flood consequence assessments.	4.10.17 Any adaptation measures should be based on the latest set of UK Climate Projections, the government's latest UK Climate Change Risk Assessment, when available and in consultation with the EA's Climate Change Allowances for Flood Risk Assessments or the Welsh Government's Climate change allowances and flood consequence assessments.	

	4.10.18 The Secretary of State may take into account reporting authorities' reports (see paragraph 4.10.4 above) to the Secretary of State when considering adaptation measures proposed by an applicant for new energy infrastructure.	4.10.18 The Secretary of State may take into account reporting authorities' reports (see paragraph 4.10.4 above) to the Secretary of State when considering adaptation measures proposed by an applicant for new energy infrastructure.	
	4.10.19 Adaptation measures should be required to be implemented at the time of construction where necessary and appropriate to do so. However, where they are necessary to deal with the impact of climate change, and that measure would have an adverse effect on other aspects of the project and/or surrounding environment (for example coastal processes), the Secretary of State may consider requiring the applicant to ensure that the adaptation measure could be implemented should the need arise, rather than at the outset of the development (for example increasing height of existing, or requiring new, sea walls).	4.10.19 Adaptation measures should be required to be implemented at the time of construction where necessary and appropriate to do so. However, where they are necessary to deal with the impact of climate change, and that measure would have an adverse effect on other aspects of the project and/or surrounding environment (for example coastal processes), the Secretary of State may consider requiring the applicant to ensure that the adaptation measure could be implemented should the need arise, rather than at the outset of the development (for example increasing height of existing, or requiring new, sea walls).	
4.11 Network Connection	4.11.4 Transmission network infrastructure and related network reinforcement associated with nationally significant new offshore wind is considered as CNP Infrastructure. Further guidance can be found in 2.8.8 of EN-3 and 2.12.7 of EN-5.	4.11.4 Transmission network infrastructure and related network reinforcement associated with nationally significant new offshore wind is considered as CNP Infrastructure. Further guidance can be found in 2.8.8 of EN-3 and 2.12.7 of EN-5.	Section 3.2 of the **Statement of Need [APP/5.4]** and Section 9.5 of the **Planning Statement [APP/5.5]** set out the Scheme meets the definition of CNP infrastructure, given that it has a capacity greater than 50MW capacity of a low carbon source of energy. Policy compliance tables 2 and 3 provide guidance on how the Applicant has addressed 2.8.8 of EN-3 and 2.12.7 of EN-5. The Applicant engaged with NGET to discuss potential opportunities for a connection offer within the Norfolk area. Subsequently, a grid connection offer was made for a 500MW capacity in Swaffham, as outlined in the **Grid Connection Statement [APP/7.1].** The **Works Plan [APP/2.3]** accurately reflects this recent engagement, whilst the illustrative material submitted together with this DCO Application (for example, **ES Figure 5.1: Concept Masterplan [APP/6.3]** and **ES Appendix 5.1: Illustrative Technical Information [APP/6.4]** will be revised as the micro-siting and orientation of the new National Grid Substation within Work No. 4A continues to be discussed. Due to the grid connection offer, a 500MW connection into the existing overhead line between Walpole and Necton as set out in the **Grid Connection Statement [APP/7.1]**. The offer outlines the need for the Applicant to source land suitable for a new National Grid Substation as detailed in Section 4.2 of **Appendix 1: Site Evaluation Report** to the **Planning Statement [APP/5.5]**. In accordance with Paragraph 4.11.5 of NPS EN-1, the Applicant engaged with NGET to discuss potential opportunities for a connection offer within the Norfolk area. During this ongoing engagement, the Applicant and National Grid reached an agreement on a connection offer of 500MW into the existing overhead line between Walpole and Necton. At the same time as National Grid's offer for a 500MW connection, a land agent indicated to the Applicant that the landowner was willing to
	4.11.6 Applicants may wish to take a commercial risk where they have not received or accepted a formal offer of a grid connection from the relevant network operator at the time of the application. In this situation applicants should provide information as part of their application confirming that there is no obvious reason why a network connection would not be possible.	4.11.6 Applicants may wish to take a commercial risk where they have not received or accepted a formal offer of a grid connection from the relevant network operator at the time of the application. In this situation applicants should provide information as part of their application confirming that there is no obvious reason why a network connection would not be possible.	
	4.11.7 The Planning Act 2008 aims to create a holistic planning regime so that the cumulative effect of different elements of the same project can be considered together. Coordinated applications typically bring economic efficiencies and reduced environmental impact. The government therefore envisages that wherever reasonably possible, applications for new generating stations and related infrastructure should be contained in a single application to the Secretary of State or in separate	4.11.7 The Planning Act 2008 aims to create a holistic planning regime so that the cumulative effect of different elements of the same project can be considered together. Coordinated applications typically bring economic efficiencies and reduced environmental impact. The government therefore envisages that wherever reasonably possible, applications for new generating stations and related infrastructure should be contained in a	

	applications submitted in tandem which have been prepared in an integrated way, as outlined in EN-5. This is particularly encouraged to ensure development of more co-ordinated transmission overall.	single application to the Secretary of State or in separate applications submitted in tandem which have been prepared in an integrated way, as outlined in EN-5. This is particularly encouraged to ensure development of more co-ordinated transmission overall.	put forward the proposed Site for a solar farm development. This single proposed Site would provide sufficient land to site the Scheme in its entirety. **ES Chapter 5: The Scheme [APP/6.1]** sets out that the Scheme comprises the construction, operation, maintenance, and decommissioning of a solar photovoltaic (PV) electricity generating station and associated development comprising Battery Energy Storage System (BESS), a Customer Substation, and Grid Connection Infrastructure, including a new National Grid Substation. The Scheme would allow for the generation and export of over 50MW Alternating Current (AC) of renewable energy, connecting into the National Electricity Transmission System (NETS) overhead line that passes through the Site. The impact assessment within **ES Topic Chapters [APP/6.2]** has been based on the worst-case parameters for each technical topic, and justification is presented within the relevant technical chapter.
	4.11.8 On some occasions it may not be possible to coordinate applications. For example, different elements of a project may have different lead-in times and be undertaken by different legal entities subject to different commercial and regulatory frameworks (for example grid companies operate within OFGEM controls) making it inefficient from a delivery perspective to submit one application. Applicants may therefore decide to submit separate applications for each element. Where this is the case, the applicant should include information on the other elements and explain the reasons for the separate application confirming that there are no obvious reasons for why other elements are likely to be refused.	4.11.8 On some occasions it may not be possible to coordinate applications. For example, different elements of a project may have different lead-in times and be undertaken by different legal entities subject to different commercial and regulatory frameworks (for example grid companies operate within OFGEM controls) making it inefficient from a delivery perspective to submit one application. Applicants may therefore decide to submit separate applications for each element. Where this is the case, the applicant should include information on the other elements and explain the reasons for the separate application confirming that there are no obvious reasons for why other elements are likely to be refused.	
	4.11.9 If this option is pursued, the applicant accepts the implicit risks involved in doing so and must ensure they provide sufficient information to comply with the EIA Regulations including the indirect, secondary, and cumulative effects, which will encompass information on grid connections.	4.11.9 If this option is pursued, the applicant accepts the implicit risks involved in doing so and must ensure they provide sufficient information to comply with the EIA Regulations including the indirect, secondary, and cumulative effects, which will encompass information on grid connections.	
	4.11.12 The Secretary of State should be satisfied that appropriate network connection arrangements are/will be in place for a given project regardless of whether one or multiple (linked) applications are submitted.	4.11.12 The Secretary of State should be satisfied that appropriate network connection arrangements are/will be in place for a given project regardless of whether one or multiple (linked) applications are submitted.	
	4.11.13 Where the Secretary of State has decided to grant consent for one project this should not in any way fetter the Secretary of State's ability to take subsequent decisions on any related projects.	4.11.13 Where the Secretary of State has decided to grant consent for one project this should not in any way fetter the Secretary of State's ability to take subsequent decisions on any related projects.	

4.12 Pollution control and other environmental regulatory regimes	4.12.7 Applicants should make early contact with relevant regulators, including EA or NRW and the MMO, to discuss their requirements for EPs and other consents. Early contact with relevant regulators is strongly encouraged to ensure that applications take account of all relevant environmental considerations and that the relevant regulators are able to provide timely advice and assurance to the Secretary of State.	4.12.7 Applicants should make early contact with relevant regulators, including EA or NRW and the MMO, to discuss their requirements for EPs and other consents. Early contact with relevant regulators is strongly encouraged to ensure that applications take account of all relevant environmental considerations and that the relevant regulators are able to provide timely advice and assurance to the Secretary of State.	The **Consents and Agreements Position Statement [APP/7.5]** has been prepared as part of this 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 permissions set out in the **draft DCO [APP/3.1].** The **Consultation Report [APP/5.1]** sets out the matters that the Applicant has engaged with the Environmental Agency on to date. NRW and MMO were not contacted given that the Scheme is not relevant to these regulators.
	4.12.8 Wherever possible, applicants should submit applications for EPs and other necessary consents at the same time as applying to the Secretary of State for development consent.	4.12.8 Wherever appropriate, applicants should submit applications for Environmental Permits and other necessary consents at the same time as applying to the Secretary of State for development consent.	
	4.12.9 In considering an application for development consent the Secretary of State should focus on whether the development itself an acceptable use of the land or sea is, and the impact of that use, rather than the control of processes, emissions or discharges themselves.	4.12.9 In considering an application for development consent the Secretary of State should focus on whether the development itself an acceptable use of the land or sea is, and the impact of that use, rather than the control of processes, emissions or discharges themselves.	**ES Chapter 14: Socio-Economics [APP/6.2]** confirms that the Site includes landholdings for agricultural business. The assessment concludes that the Scheme's construction, operational and decommissioning phases will have a minor adverse effect on land use, which is not significant in EIA terms. The surrounding land is predominantly agricultural. The Scheme is not considered to impact the continued use of this land for agricultural purposes. **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** and **Appendix 1: Site Evaluation Report** to the **Planning Statement [APP/5.5]** describe the detailed site evaluation and assessment of alternatives process undertaken by the Applicant. These set out the suitability of the land for solar development.
	4.12.10 The Secretary of State should work on the assumption that the relevant pollution control regime and other environmental regulatory regimes, including those on land drainage, water abstraction and biodiversity, will be properly applied and enforced by the relevant regulator. The Secretary of State should act to complement but not seek to duplicate them.	4.12.10 The Secretary of State should work on the assumption that the relevant pollution control regime and other environmental regulatory regimes, including those on land drainage, water abstraction and biodiversity, will be properly applied and enforced by the relevant regulator. The Secretary of State should act to complement but not seek to duplicate them.	The DCO Application is accompanied by a **Consents and Agreements Position Statement [APP/7.5]**. This Schedule outlines the other consents, permits and licences that would be required to facilitate the Scheme, other than those written into the **draft DCO [APP/3.1]**. The Applicant acknowledges the preference (set out in Paragraph 4.12.8 of NPS EN-1) for applicants to submit applications for other necessary consents at the same time as seeking development consent from the Secretary of State, however, the level of detail required to obtain such permits and licences is not fully available at this stage. The **Consents and Agreements Position Statement [APP/7.5]** sets out the Applicant's position on expected subsequent applications expected to be undertaken by the relevant contractor at the detailed design stage when the relevant information becomes available, should DCO consent be granted. The Applicant considers that, under paragraph 4.12.16 of NPS EN-1 and based on the **Consents and Agreements Position Statement [APP/7.5]**, there should be no reason for the Secretary of State to believe that any operational pollution permits, licences and/or other consents will not be granted.
	4.12.13 In considering the impacts of the project, the Secretary of State may wish to consult the regulator on any management plans that would be included in an Environmental Permit application.	4.12.13 In considering the impacts of the project, the Secretary of State may wish to consult the regulator on matters relevant to the grant of, or conditions which would otherwise be included in, an environmental permit. The Secretary of State should be satisfied that development consent can be granted taking full account of environmental impacts.	

	4.12.14 The Secretary of State should be satisfied that development consent can be granted taking full account of environmental impacts.	4.12.14 The Secretary of State should be satisfied that development consent can be granted taking full account of environmental impacts.	
4.12 Safety	4.13.5 Applicants should consult with the HSE on matters relating to safety.	4.13.5 Applicants should consult with the HSE on matters relating to safety.	The Applicant consulted with the HSE, the HSE did not provide comment. As per Section 3 of the COMAH Regulations 2015, Solar and BESS development is not applicable to the regime and therefore no further response is required. As the Scheme is not subject to the COMAH Regulations 2015, Paragraphs 4.13.6 – 4.13.8 of NPS EN-1 are not engaged. Notwithstanding the fact that BESS is not applicable to the COMAH Regulations 2015, this DCO application is accompanied by an **oBSMP [APP/7.14]**, which sets out the key fire safety provisions for the BESS, including measures to reduce fire risk and fire protection measures.
	4.13.6 Applicants seeking to develop infrastructure subject to the COMAH regulations should make early contact with the Competent Authority.	4.13.6 Applicants seeking to develop infrastructure subject to the COMAH regulations should make early contact with the Competent Authority.	
	4.13.7 If a safety report is required it is important to discuss with the Competent Authority the type of information that should be provided at the design and development stage, and what form this should take. This will enable the Competent Authority to review as much information as possible before construction begins, in order to assess whether the inherent features of the design are sufficient to prevent, control and mitigate major accidents.	4.13.7 If a safety report is required it is important to discuss with the Competent Authority the type of information that should be provided at the design and development stage, and what form this should take. This will enable the Competent Authority to review as much information as possible before construction begins, in order to assess whether the inherent features of the design are sufficient to prevent, control and mitigate major accidents.	
	4.13.8 The Secretary of State should be satisfied that a safety assessment has been done, where required, and that the Competent Authority has assessed that it meets the safety objectives described above.	4.13.8 The Secretary of State should be satisfied that a safety assessment has been done, where required, and that the Competent Authority has assessed that it meets the safety objectives described above.	
4.15 Common law nuisance and statutory nuisance	4.15.5 At the application stage of an energy NSIP, possible sources of nuisance under section 79(1) of the EPA 1990 and how they may be mitigated or limited should be identified by the applicant so that appropriate requirements can be included in any subsequent order granting development consent (see Section 5.7 on dust, odour, artificial light etc. and Section 5.12 on noise and vibration).	4.15.5 At the application stage of an energy NSIP, possible sources of nuisance under section 79(1) of the EPA 1990 and how they may be mitigated or limited should be identified by the applicant so that appropriate requirements can be included in any subsequent order granting development consent (see Section 5.7 on dust, odour, artificial light etc. and Section 5.12 on noise and vibration).	The Applicant has prepared and submitted a **Statutory Nuisance Statement [APP/5.3]** as is required under APFP Regulation 5(2)(f) and Paragraph 4.15.5 of NPS EN-1. The **Statutory Nuisance Statement [APP/5.3]** draws upon the assessment conclusions from **ES Chapter 16: Other Environmental Matters** and **ES Chapter 10: Noise and Vibration [APP/6.2]** to set out that the construction, operational and decommissioning phases of the Scheme would not cause a statutory nuisance. No claim against statutory nuisance in respect of noise and vibration is therefore envisaged in respect of a statutory nuisance under Section 79(1)(g) or (ga) of the EPA 1990. The defence to proceedings in respect of statutory nuisance is set out in Part 2, Article 7 of the **draft DCO [APP/3.1]**.

	4.15.6 At the application stage of an energy NSIP, possible sources of nuisance under section 79(1) of the EPA 1990 and how they may be mitigated or limited should be considered by the Secretary of State so that appropriate requirements can be included in any subsequent order granting development consent (see Section 5.7 on Dust, odour, artificial light etc. and Section 5.12 on Noise and vibration).	4.15.6 At the application stage of an energy NSIP, possible sources of nuisance under section 79(1) of the EPA 1990 and how they may be mitigated or limited should be considered by the Secretary of State so that appropriate requirements can be included in any subsequent order granting development consent (see Section 5.7 on Dust, odour, artificial light etc. and Section 5.12 on Noise and vibration).	As such, the Applicant considers that sufficient assessment and mitigation measures are proposed to be secured to enable the Secretary of State to conclude that no statutory nuisances would arise from the Scheme's construction, operation and decommissioning phases.
5.2 Air Quality and Emissions ***Applicant Assessment***	5.2.8 Where the project is likely to have adverse effects on air quality the applicant should undertake an assessment of the impacts of the proposed project as part of the ES.	5.2.8 Where the project is likely to have adverse effects on air quality the applicant should undertake an assessment of the impacts of the proposed project as part of the ES.	**ES Chapter 16: Other Environmental Measures [APP/6.2]** discusses potential Air Quality impacts arising as a result of the Scheme. With the measures set out in the **oCEMP [APP/7.6], oCTMP [APP/7.7]** and the **oDS [APP/7.10], ES Chapter 16: Other Environmental Measures [APP/6.2]** concludes that the Scheme is not likely to result in significant air quality effects. There will be no potential eutrophication impacts.
	5.2.9 The ES should describe: • existing air quality concentrations and the relative change in air quality from existing levels; • any significant air quality effects, mitigation action taken and any residual effects, distinguishing between the project stages and taking account of any significant emissions from any road traffic generated by the project; • the predicted absolute emissions, concentration change and absolute concentrations as a result of the proposed project, after mitigation methods have been applied; and • any potential eutrophication impacts.	5.2.9 The ES should describe: • existing air quality concentrations and the relative change in air quality from existing levels; • any significant air quality effects, mitigation action taken and any residual effects, distinguishing between the project stages and taking account of any significant emissions from any road traffic generated by the project; • the predicted absolute emissions, concentration change and absolute concentrations as a result of the proposed project, after mitigation methods have been applied; and • any potential eutrophication impacts.	
	5.2.10 In addition, applicants should consider the Environment Targets (Fine Particulate Matter) (England) Regulations 2022 and associated Defra guidance.	5.2.10 In addition, applicants should consider the Environment Targets (Fine Particulate Matter) (England) Regulations 2022 and associated Defra guidance.	**ES Chapter 16: Other Environmental Measures [APP/6.2]** identifies 'The Environment Targets (Fine Particulate Matter) (England) Regulations 2023' as important and relevant legislation to the assessment and confirms that the assessment has considered the Regulations.
	5.2.11 Defra publishes future national projections of air quality based on estimates of future levels of emissions, traffic, and vehicle fleet. Projections are updated as the evidence base changes and the applicant should ensure these are current at the point of an application.	5.2.11 Defra publishes future national projections of air quality based on estimates of future levels of emissions, traffic, and vehicle fleet. Projections are updated as the evidence base changes and the applicant should ensure these are current at the point	In 2023, the Environmental Improvement Plan (EIP) outlined updates to the PM2.5 Air Quality Objective for future years. These are the long-term targets of 10 µg/m3 by 2040 and the interim targets of 12 µg/m3 by 2028. In 2028, the first anticipated year of operation, Defra predicted background concentrations of PM2.5 were between 7.9

	The applicant's assessment should be consistent with this but may include more detailed modelling and evaluation to demonstrate local and national impacts. If an applicant believes they have robust additional supporting evidence, to the extent they could affect the conclusions of the assessment, they should include this in their representations to the Examining Authority along with the source.	of an application. The applicant's assessment should be consistent with this but may include more detailed modelling and evaluation to demonstrate local and national impacts. If an applicant believes they have robust additional supporting evidence, to the extent they could affect the conclusions of the assessment, they should include this in their representations to the Examining Authority along with the source.	– 8.2 µg/m3 across the Order Limits, which is comfortably below the 12 µg/m3 interim target. No future projections have been made by Defra past 2030, so it is not possible to consider concentrations up to 2040 when the long-term target of 10 µg/m3 should be achieved; however, there are not expected to be significant sources of PM2.5 during the Scheme's operational phase. At the time of writing, there had been no further updates to relevant Air Quality Objectives for other pollutants considered in **ES Chapter 16: Other Environmental Measures [APP/6.2]**.
	5.2.12 Where a proposed development is likely to lead to a breach of any relevant statutory air quality limits, objectives or targets, or affect the ability of a non-compliant area to achieve compliance within the timescales set out in the most recent relevant air quality plan/strategy at the time of the decision, the applicant should work with the relevant authorities to secure appropriate mitigation measures to ensure that those statutory limits, objectives or targets are not breached.	5.2.12 Where a proposed development is likely to lead to a breach of any relevant statutory air quality limits, objectives or targets, or affect the ability of a non-compliant area to achieve compliance within the timescales set out in the most recent relevant air quality plan/strategy at the time of the decision, the applicant should work with the relevant authorities to secure appropriate mitigation measures to ensure that those statutory limits, objectives or targets are not breached.	**ES Chapter 16: Other Environmental Measures [APP/6.2]** confirms that the Scheme would not lead to a breach of any relevant statutory air quality thresholds or affect the ability of a non-compliant area to achieve compliance.
	5.2.13 The Secretary of State should consider whether mitigation measures are needed both for operational and construction emissions over and above any which may form part of the project application. A construction management plan may help codify mitigation at this stage. In doing so the Secretary of State should have regard to the Air Quality Strategy in England, or the Clean Air Plan for Wales in Wales, or any successors to these and should consider relevant advice within Local Air Quality Management guidance and PM2.5 targets guidance	5.2.13 The Secretary of State should consider whether mitigation measures are needed both for operational and construction emissions over and above any which may form part of the project application. A construction management plan may help codify mitigation at this stage. In doing so the Secretary of State should have regard to the Air Quality Strategy in England, or the Clean Air Plan for Wales in Wales, or any successors to these and should consider relevant advice within Local Air Quality Management guidance and PM2.5 targets guidance	**ES Chapter 16: Other Environmental Measures [APP/6.2]** discusses potential Air Quality impacts arising as a result of the Scheme. With the measures set out in the **oCEMP [APP/7.6], oCTMP [APP/7.7]** and the **oDS [APP/7.10], ES Chapter 16: Other Environmental Measures [APP/6.2]** concludes that the Scheme is not likely to result in significant air quality effects.
	5.2.14 The mitigations identified in Section 5.14 on traffic and transport impacts will help mitigate the effects of air emissions from transport.	5.2.14 The mitigations identified in Section 5.14 on traffic and transport impacts will help mitigate the effects of air emissions from transport.	Section 6.3 of the **oCTMP [APP/7.7]** states that a Travel Plan will be developed to manage the arrival and departure profiles of staff and to encourage sustainable modes of transport, particularly a shuttle bus and car-sharing. A Travel Plan Coordinator (TPC) will be appointed to oversee the implementation of the Travel Plan, whose responsibilities will comprise, but not necessarily be limited to, implementing measures set out in the Travel Plan, raising awareness and promoting the Travel Plan and providing advice to workers regarding sustainable travel options. The following aims of the Travel Plan are set out to improve access by active, public and shared transport: • The promotion of car sharing to reduce single occupancy car journeys • The provision of a shuttle bus to reduce single occupancy car journeys; and

			• The increase of knowledge on public transport and Active Travel available to workers. Suggested measures could include: • Establish a car share scheme for workers • Arrange on-site facilities for workers, such as storage lockers for equipment • Provide a map with identified cycling/walking/bus routes to a Site; and • Provide an emergency cycle repair kit at the compounds. These suggested measures are also included within the **oOTMP [APP/7.9]** as secured by the Requirement 8 of Schedule 2 of the **dDCO [APP/3.1]**. Each of the aims and measures seeks to mitigate the effect of air emissions from transport by reducing the number of vehicles used for transporting workers. These measures seek to reduce the need for parking on-site and contribute to the decarbonisation of the transport network by offering a wider modal choice: • Provision of shuttle buses to transport workers to and from nearby conurbations as well as internally within the Scheme • Establish a car share scheme for workers • Consolidation of deliveries through full and reverse logistics strategies where possible; and • Deliveries will be made, when possible, directly to the primary and secondary construction compounds, then transferred by a smaller vehicle to consolidate internal vehicle trips across the Scheme. Section 4.9 of the **oDS [APP/7.10]** sets out the following measures to reduced emissions during the decommissioning phase: • Segregating waste for re-use and recycling where possible • Adoption of CCS to assist in reducing pollution • Minimising the creation of waste and maximising the use of alternative materials with lower embodied carbon and materials with a higher recycled content where feasible • Minimising the use of natural resources and unnecessary materials • Encouraging low carbon transport modes, including staff minibuses and car sharing schemes, which can be implemented through a Travel Plan • Switching vehicles and plant off when not in use and ensuring decommissioning vehicles conform to UK emissions standards at the time; and • Regular maintenance of the plant to optimise efficiency.
Secretary of State decision making	5.2.15 Many activities involving air emissions are subject to pollution control. The considerations set out in Section 4.12 on the interface between planning and pollution control therefore apply. The Secretary of State must also consider duties under other legislation including duties under the Environment Act 2021 in relation to environmental targets and have regard to policies set out in the	5.2.15 Many activities involving air emissions are subject to pollution control. The considerations set out in Section 4.12 on the interface between planning and pollution control therefore apply. The Secretary of State must also consider duties under other legislation including duties under the Environment Act 2021 in relation to environmental targets and have	**ES Chapter 16: Other Environmental Measures [APP/6.2]** discusses potential Air Quality impacts arising as a result of the Scheme. With the measures set out in the **oCEMP [APP/7.6], oCTMP [APP/7.7]** and the **oDS [APP/7.10], ES Chapter 16: Other Environmental Measures [APP/6.2]** concludes that the Scheme is not likely to result in significant air quality effects. These embedded mitigation measures have been established based on the 'Institute of Air Quality Management (IAQM) Guidance on the Assessment of Dust from Demolition and Construction v2.2 (2024)' to minimise the dust and exhaust emission impacts from the Scheme.

	Government's Environmental Improvement Plan 2023.	regard to policies set out in the government's Environmental Improvement Plan.	
	5.2.16 The Secretary of State should give air quality considerations substantial weight where a project would lead to a deterioration in air quality. This could for example include where an area breaches any national air quality limits or statutory air quality objectives. However, air quality considerations will also be important where substantial changes in air quality levels are expected, even if this does not lead to any breaches of statutory limits, objectives or targets.	5.2.16 The Secretary of State should give air quality considerations substantial weight where a project would lead to a deterioration in air quality. This could for example include where an area breaches any national air quality limits or statutory air quality objectives. However, air quality considerations will also be important where substantial changes in air quality levels are expected, even if this does not lead to any breaches of statutory limits, objectives or targets.	
	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.	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.	The justification for the Air Quality Assessment Study Area, including the Study Area extent figure showing proposed construction routes, receptor locations (human and ecological) has been provided in Figure 16.1 of **Appendix 1: Construction and Decommissioning Phase Dust Assessment** of the **oCEMP [APP/7.6].** Section 16.5 of **ES Chapter 16: Other Environmental Matters [APP/6.2]** sets out that the Scheme is not near any sensitive receptors such as an education or healthcare facility, residential use or a sensitive or protected habitat, therefore the effects during construction and decommissioning would not be significant. With the measures set out in the **oCEMP [APP/7.6]**, **ES Chapter 16: Other Environmental Measures [APP/6.2]** concludes that the Scheme is not likely to result in significant air quality effects.
	5.2.18 Where a project is proposed near to a sensitive receptor site for air quality, if the applicant cannot provide justification for this location, and a suitable mitigation plan, the Secretary of State should refuse consent.	5.2.18 Where a project is proposed near to a sensitive receptor site for air quality, if the applicant cannot provide justification for this location, and a suitable mitigation plan, the Secretary of State should refuse consent.	
	5.2.19 In all cases, the Secretary of State must take account of any relevant statutory air quality limits, objectives and targets. If a project will lead to non-compliance with a statutory limit, objective or target the Secretary of State should refuse consent.	5.2.19 In all cases, the Secretary of State must take account of any relevant statutory air quality limits, objectives and targets. If a project will lead to non-compliance with a statutory limit, objective or target the Secretary of State should refuse consent.	**ES Chapter 16: Other Environmental Measures [APP/6.2]** confirms that the Scheme would not lead to a breach of any relevant statutory air quality thresholds or affect the ability of a non-compliant area to achieve compliance.
5.3 Greenhouse Gas Emission ***Applicant Assessment***	5.3.4 All proposals for energy infrastructure projects should include a GHG assessment as part of their ES (See Section 4.3). This should include: • A whole life GHG assessment showing construction, operational and decommissioning GHG impacts, including impacts from change of land use.	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	Section 13.7 of **ES Chapter 13: Climate Change [APP/6.2]** sets out the GHG Assessment for this Scheme. The GHG Reduction Strategy is included within the **oCEMP [APP/7.6]** and **oOEMP [APP/7.8]**. Section 13.8 of **ES Chapter 13: Climate Change [APP/6.2]** sets out the embedded mitigation measures to drive down the climate change impacts at each phase of the Scheme. Section 13.9 of **ES Chapter 13: Climate Change [APP/6.2]** sets out that the total construction GHG emissions are expected to reach 505,958 tCO2e, which is considered not significant in EIA terms.

	• An explanation of the steps that have been taken to drive down the climate change impacts at each of those stages. • Measurement of embodied GHG impact from the construction stage. • How reduction in energy demand and consumption during operation has been prioritised in comparison with other measures. • How operational emissions have been reduced as much as possible through the application of best available techniques for that type of technology. • Calculation of operational energy consumption and associated carbon emissions. • Whether and how any residual GHG emissions will be (voluntarily) offset or removed using a recognised framework. • Where there are residual emissions, the level of emissions and the impact of those on national and international efforts to limit climate change, both alone and where relevant in combination with other developments at a regional or national level, or sector level, if sectoral targets are developed.	climate change impacts at each of those stages. • Measurement of embodied GHG impact from the construction stage. • How reduction in energy demand and consumption during operation has been prioritised in comparison with other measures. • How operational emissions have been reduced as much as possible through the application of best available techniques for that type of technology. • Calculation of operational energy consumption and associated carbon emissions. • Whether and how any residual GHG emissions will be (voluntarily) offset or removed using a recognised framework. • Where there are residual emissions, the level of emissions and the impact of those on national and international efforts to limit climate change, both alone and where relevant in combination with other developments at a regional or national level, or sector level, if sectoral targets are developed.	To reduce emissions during the operation phase, the **oOEMP [APP/7.8]** utilises the **oCEMP [APP/7.6]** where applicable to increase the efficiency of maintenance activities. Section 13.9 of **ES Chapter 13: Climate Change [APP/6.2]** sets out that total energy consumption during the operation phase is estimated to be 150,480,000 kwh. The carbon emissions associated with this are estimated to be 5,782 tCO2e. **ES Chapter 13: Climate Change [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, a significant residual beneficial effect on global climate across the Scheme's operational phase. The embedded and additional mitigation measures are documented within the **oCEMP [APP/7.6]**, **oOEMP [APP/7.8]**, **and oDS [APP/7.10]** and secured via corresponding requirements of the **draft DCO [APP/3.1]**.
Migration	5.3.5 A GHG assessment should be used to drive down GHG emissions at every stage of the proposed development and ensure that emissions are minimised as far as possible for the type of technology, taking into account the overall objectives of ensuring our supply of energy always remains secure, reliable and affordable, as we transition to net zero.	5.3.5 A GHG assessment should be used to drive down GHG emissions at every stage of the proposed development and ensure that emissions are minimised as far as possible for the type of technology, taking into account the overall objectives of ensuring our supply of energy always remains secure, reliable and affordable, as we transition to net zero.	A GHG Impact Assessment, which considers the embodied carbon GHG emissions at each phase of the Scheme, is outlined in Section 13.9 of **ES Chapter 13: Climate Change [APP/6.2]**. Section 13.8 of **ES Chapter 13: Climate Change [APP/6.2]** outlines the embedded mitigation measures for climate change impacts at each phase of the Scheme. The **oCEMP [APP/7.6]** and **oOEMP [APP/7.8]** detail the measures incorporated in the Scheme to drive down GHG emissions during the construction and operation of the Scheme. These will be secured through the Requirements in Schedule 2 to the **draft DCO [APP/3.1].** These include (but are not limited to): • Measures to reduce waste, including designing the Scheme in such a way as to minimise the creation of waste • Measures to reduce vehicle emissions, including encouraging the use of lower carbon modes of transport, switching vehicles and plant off when not in use, and implementing a shuttle bus; and
	5.3.6 Applicants should look for opportunities within the proposed development to embed nature-based or technological solutions to mitigate or offset the emissions of construction and decommissioning	5.3.6 Applicants should look for opportunities within the proposed development to embed nature-based or technological solutions to mitigate or offset the emissions of construction and decommissioning	

	5.3.7 Steps taken to minimise and offset emissions should be set out in a GHG Reduction Strategy, secured under the Development Consent Order. The GHG Reduction Strategy should consider the creation and preservation of carbon stores and sinks including through woodland creation, hedgerow creation and restoration, peatland restoration and through other natural habitats.	5.3.7 Steps taken to minimise and offset emissions should be set out in a GHG Reduction Strategy, secured under the Development Consent Order. The GHG Reduction Strategy should consider the creation and preservation of carbon stores and sinks including through woodland creation, hedgerow creation and restoration, peatland restoration and through other natural habitats.	• General good practice measures, including adopting the Considerate Constructors Scheme (CCS) to assist in reducing pollution (including GHGs), conducting regular planned maintenance and retaining existing vegetation as far as practicable. The Scheme also includes nature-based solutions as set out in the **oLEMP [APP/7.11].** This consists of targeted planting of trees, shrubs, and grassland as well as the management of them to improve biodiversity in and around the Scheme. Similar measures to the construction phase will be developed prior to the decommissioning phase for the use of lower-carbon and more climate change resilient methods, as highlighted in the **oDS [APP/7.10]**.
Secretary of State decision making	5.3.8 The Secretary of State must be satisfied that the applicant has as far as possible assessed the GHG emissions of all stages of the development.	5.3.8 The Secretary of State must be satisfied that the applicant has as far as possible assessed the GHG emissions of all stages of the development.	The GHG emissions at each phase of the Scheme are outlined in Section 13.9 of **ES Chapter 13: Climate Change [APP/6.2]**. Embedded mitigation to reduce GHG emissions of the construction and decommissioning phases is set out in Section 13.8 of **ES Chapter 13: Climate Change [APP/6.2].** The following embedded mitigation has been set out in Section 13.8 of **ES Chapter 13: Climate Change [APP/6.2]** through the **oCEMP [APP/7.6], oOEMP [APP/7.8]**, and **oDS [APP/7.10]** as secured through the relevant requirements of the **dDCO [APP/3.1]**, to mitigate or offset the emissions of the construction and decommissioning phases of the Scheme: • Construction phase o Waste will be reduced through off-site prefabrication, segregation at the source to facilitate a high proportion/quality of recycling and to increase recycling in general, minimising waste and maximising the use of alternative materials with lower embodied carbon, reusing infrastructure and resources within the Development Area, and off-site reuse, recycling and recovery of material and waste where reuse on site was not practical o Adoption of the Considerate Constructors Scheme (CCS) to assist in reducing pollution o Regular planned maintenance of the construction plant and machinery to optimise efficiency; and o Retention of existing vegetation. • Decommissioning phase o Increasing recyclability through waste segregation o Adoption of CCS to reduce pollution o Minimising the creation of waste and maximising the use of alternatives o Minimising the use of natural resources and unnecessary materials o Encouraging low carbon transport modes, including the potential for staff minibuses and car sharing, which can be implemented through a Travel Plan o Switching vehicles and plant off when not in use and ensuring decommissioning vehicles conform to UK emissions standards at the time o Regular maintenance for optimising efficiency
	5.3.9 The Secretary of State should be content that the applicant has taken all reasonable steps to reduce the GHG emissions of the construction and decommissioning stage of the development.	5.3.9 The Secretary of State should be content that the applicant has taken all reasonable steps to reduce the GHG emissions of the construction and decommissioning stage of the development.	
	5.3.10 The Secretary of State should give appropriate weight to projects that embed nature-based or technological processes to mitigate or offset the emissions of construction and decommissioning within the proposed development. However, in light of the vital role energy infrastructure plays in the process of economy wide decarbonisation, the Secretary of State must accept that there are likely to be some residual emissions from construction and decommissioning of energy infrastructure.	5.3.10 The Secretary of State should give appropriate weight to projects that embed nature-based or technological processes to mitigate or offset the emissions of construction and decommissioning within the proposed development. However, in light of the vital role energy infrastructure plays in the process of economy wide decarbonisation, the Secretary of State must accept that there are likely to be some residual emissions from construction and decommissioning of energy infrastructure.	

			○ Health and safety assessments, including protection of workers and resources during extreme weather; and ○ Use of cooling systems where necessary. Section 13.11 of **ES Chapter 13: Climate Change [APP/6.2]** sets out that significant residual effects are defined as not significant for the construction and decommissioning phases, and significant and beneficial for the operation phase. The Scheme also includes nature-based solutions as set out in the **oLEMP [APP/7.11].** This consists of targeted planting of trees, shrubs, and grassland as well as the management of them to improve biodiversity in and around the Scheme.
	5.3.11 Operational GHG emissions are a significant adverse impact from some types of energy infrastructure which cannot be totally avoided (even with full deployment of CCS technology). Given the characteristics of these and other technologies, as noted in Part 3 of this NPS, and the range of non-planning policies that can be used to decarbonise electricity generation, such as the UK ETS (see Section 2.4), government has determined that operational GHG emissions are not reasons to prohibit the consenting of energy projects or to impose more restrictions on them in the planning policy framework than are set out in the energy NPSs (e.g. the CCR requirements). Any carbon assessment will include an assessment of operational GHG emissions, but the policies set out in Part 2, including the UK ETS, can be applied to these emissions.	5.3.11 Operational GHG emissions are a significant adverse impact from some types of energy infrastructure which cannot be totally avoided (even with full deployment of CCS technology). Given the characteristics of these and other technologies, as noted in Part 3 of this NPS, and the range of non-planning policies that can be used to decarbonise electricity generation, such as the UK ETS (see Section 2.4), government has determined that operational GHG emissions are not reasons to prohibit the consenting of energy projects or to impose more restrictions on them in the planning policy framework than are set out in the energy NPSs (e.g. the CCR requirements). Any carbon assessment will include an assessment of operational GHG emissions, but the policies set out in Part 2, including the UK ETS, can be applied to these emissions.	Section 13.9 of **ES Chapter 13: Climate Change [APP/6.2]** sets out the GHG emissions expected for the operation phase of the development. **ES Chapter 13: Climate Change [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, a significant residual beneficial effect on global climate across the Scheme's operational phase. The embedded and additional mitigation measures are documented within the **oCEMP [APP/7.6]**, **oOEMP [APP/7.8]**, **and oDS [APP/7.10]** and secured via corresponding requirements of the **draft DCO [APP/3.1]**.
	5.3.12 Operational emissions will be addressed in a managed, economy-wide manner, to ensure consistency with carbon budgets, net zero and our international climate commitments. The Secretary of State does not, therefore need to assess individual applications for planning consent against operational carbon emissions and their contribution to carbon budgets, net zero and our international climate commitments.	5.3.12 Operational emissions will be addressed in a managed, economy-wide manner, to ensure consistency with carbon budgets, net zero and our international climate commitments. The Secretary of State does not, therefore need to assess individual applications for planning consent against operational carbon emissions and their contribution to carbon budgets, net zero and our international climate commitments.	Section 13.9 **ES Chapter 13: Climate Change [APP/6.2]** sets out that on average, the operation phase of the Scheme accounts for 1.39% of the 2031-2033 Electricity Carbon budgets.
5.4 Biodiversity and Geological Conservation ***Applicant Assessment***	5.4.17 Where the development is subject to EIA, the applicant should ensure that the ES clearly sets out any effects on internationally, nationally, and locally designated sites of ecological or geological conservation importance (including those outside England), on protected species and on habitats and other	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	**ES Chapter 7: Ecology and Biodiversity [APP/6.2]** sets out the effects on the scheme of internationally, nationally and locally designated sites of ecological conservation importance, protected species, habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats.

	species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats.	on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats.	**ES Chapter 7: Ecology and Biodiversity [APP/6.2]** confirms that no significant adverse effects are anticipated at national or local nature conservation sites, protected species, habitats and other species.
	5.4.19 The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests.	5.4.20 The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests	**ES Chapter 7: Ecology and Biodiversity [APP/6.2]**, sets out that the design of the Scheme has evolved to avoid impacts and effects on ecology and biodiversity as far as practicable. The Scheme incorporates a number of enhancements resulting in a number of significant beneficial effects, including (but not limited to): • Overall, beneficial effects at the local level on the grassland and various species as a result of the reversion of the intensive arable fields, which currently dominate the Solar PV Sites, to grassland for the lifetime of the Scheme • Long-term beneficial effects at the local level in relation to hedgerow and woodland habitats, as a result of the proposed hedgerow, woodland and tree planting set out in the **oLEMP [APP/7.11]**; and • The Scheme will achieve a minimum of 10% BNG. However, the Applicant anticipates delivering substantially more than this, as evidenced by the BNG Assessment, which demonstrates what is likely to be proposed. The design of the Scheme incorporates nature-based solutions, where practicable, such as developing biodiversity enhancement measures and considering factors related to hydrology, flood risk, landscape, and ecology. As part of the EIA process, an iterative approach has been adopted where significant environmental effects have been avoided where possible through design refinements and iterations as detailed further within **Appendix 1: Site Evaluation** of the **Planning Statement [APP/5.5]**, **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** and the **Design Approach Document [APP/5.7].**
	5.4.20 Applicants should consider wider ecosystem services and benefits of natural capital when designing enhancement measures.	5.4.21 Applicants should consider wider ecosystem services and benefits of natural capital when designing enhancement measures.	
	5.4.21 As set out in Section 4.7, the design process should embed opportunities for nature inclusive design. Energy infrastructure projects have the potential to deliver significant benefits and enhancements beyond Biodiversity Net Gain, which result in wider environmental gains (see Section 4.6 on Environmental and Biodiversity Net Gain). The scope of potential gains will be dependent on the type, scale, and location of each project.	5.4.22 As set out in Section 4.7, the design process should embed opportunities for nature inclusive design. Energy infrastructure projects have the potential to deliver significant benefits and enhancements beyond Biodiversity Net Gain, which result in wider environmental gains (see Section 4.6 on Environmental and Biodiversity Net Gain). The scope of potential gains will be dependent on the type, scale, and location of each project.	
	5.4.22 The design of energy NSIP proposals will need to consider the movement of mobile/migratory species such as birds, fish and marine and terrestrial mammals and their potential to interact with infrastructure. As energy infrastructure could occur anywhere within England and Wales, both inland and onshore and offshore, the potential to affect mobile and migratory species across the UK and more widely across Europe (transboundary effects) requires consideration, depending on the location of development.	5.4.23 The design of energy NSIP proposals will need to consider the movement of mobile/migratory species such as birds, fish and marine and terrestrial mammals and their potential to interact with infrastructure. As energy infrastructure could occur anywhere within England and Wales, both inland and onshore and offshore, the potential to affect mobile and migratory species across the UK and more widely across Europe (transboundary effects) requires consideration, depending on the location of development. Applicants should consider relevant plan policies in marine plans in England.	In **ES Chapter 7: Ecology and Biodiversity [APP/6.2],** the Scheme has considered the impact on the movement of mobile/migratory species, such as birds, fish, and marine and terrestrial mammals, and their potential interactions with infrastructure. The chapter concludes that there are no residual effects on ecology and biodiversity identified during the construction and decommissioning of the Scheme. While some moderate adverse residual effects have been identified, mitigation for these is set out in the **oLEMP [APP/7.11]** which is secured by a requirement of the **draft DCO [APP/3.1]**. **ES Chapter 7: Ecology and Biodiversity [APP/6.2],** describes the existing levels and assesses the anticipated biodiversity effects of the Scheme's construction, operational, and decommissioning and is supported by extensive survey works to confirm the extent to which ecological habitats and species are likely to be affected by the Scheme, within **ES Appendix 7.2: Baseline Ecological Survey Report [APP/6.4].** The chapter concludes that there are no residual effects on ecology and biodiversity identified during the construction and decommissioning of the Scheme. While some moderate adverse residual effects have been identified, mitigation for these is set out in the **oLEMP [APP/7.11]** which is secured by a requirement of the **draft DCO [APP/3.1]**.
Habitats Regulations	5.4.25 The applicant should seek the advice of the appropriate SNCB and provide the Secretary of State with such information as the	5.4.26 The applicant should seek the advice of the appropriate SNCB and provide the Secretary of State with such information as	A **Shadow Habitats Regulations Assessment [APP/7.3]** has been prepared in accordance with the requirements of Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) to set out whether the Scheme is likely

	Secretary of State may reasonably require, to determine whether an HRA Appropriate Assessment (AA) is required. Applicants can request and agree 'Evidence Plans' with SNCBs, which is a way to record upfront the information the applicant needs to supply with its application, so that the HRA can be efficiently carried out. If an AA is required, the applicant must provide the Secretary of State with such information as may reasonably be required to enable the Secretary of State to conduct the AA. This should include information on any mitigation measures that are proposed to minimise or avoid likely significant effects.	the Secretary of State may reasonably require, to determine whether an HRA Appropriate Assessment (AA) is required. Applicants can request and agree 'Evidence Plans' with SNCBs, which is a way to record upfront the information the applicant needs to supply with its application, so that the HRA can be efficiently carried out. If an AA is required, the applicant must provide the Secretary of State with such information as may reasonably be required to enable the Secretary of State to conduct the AA. This should include information on any mitigation measures that are proposed to minimise or avoid likely significant effects.	to have any significant effect on European designated sites. The report concludes that there will be no significant effects on European Sites during the construction, operation, or decommissioning phases of the Scheme, or in combination with other plans and projects.
	5.4.26 If, during the pre-application stage, the SNCB indicate that the proposed development is likely to adversely impact the integrity of habitat sites, the applicant must include with their application such information as may reasonably be required to assess a potential derogation under the Habitats Regulations	5.4.27 If, during the pre-application stage, the SNCB indicate that the proposed development is likely to adversely impact the integrity of habitat sites, the applicant must include with their application such information as may reasonably be required to assess a potential derogation under the Habitats Regulations.	
	5.4.27 If the SNCB gives such an indication at a later stage in the development consent process, the applicant must provide this information as soon as is reasonably possible and before the close of the examination. This information must include assessment of alternative solutions, a case for Imperative Reasons of Overriding Public Interest (IROPI) and appropriate environmental compensation.	5.4.28 If the SNCB gives such an indication at a later stage in the development consent process, the applicant must provide this information as soon as is reasonably possible and before the close of the examination. This information must include assessment of alternative solutions, a case for Imperative Reasons of Overriding Public Interest (IROPI) and appropriate environmental compensation.	NE has raised no concerns over adverse effects on European Site(s), and the applicant has submitted a **Shadow Habitats Regulations Assessment [APP/7.3],** which sets out the significant distance between the Scheme and European site(s) and indicates that there would be no adverse effects. No potential for likely significant effects is identified in relation to the key features of Breckland SPA and Norfolk Valley Fens SAC (either alone or in combination with other plans or projects) following consideration of the proposed Scheme and associated information. As such, there is no requirement for any progression to Stage 2. This is in line with advice received from Natural England, including as set out within the EIA Scoping Opinion and response to Consultation, in accordance with Section 42 of the Planning Act 2008.
	5.4.28 Provision of such information will not be taken as an acceptance of adverse impacts and if an applicant disputes the likelihood of adverse impacts, it can provide this information as part of its application 'without prejudice' to the Secretary of State's final decision on the impacts of the potential development. If, in these circumstances, an applicant does not supply information required for the assessment of a potential derogation, there will be no expectation that the Secretary of State will allow the applicant the opportunity to provide such information following the examination.	5.4.29 Provision of such information will not be taken as an acceptance of adverse impacts and if an applicant disputes the likelihood of adverse impacts, it can provide this information as part of its application 'without prejudice' to the Secretary of State's final decision on the impacts of the potential development. If, in these circumstances, an applicant does not supply information required for the assessment of a potential derogation, there will be no expectation that the Secretary of State will allow the applicant the opportunity to provide such information following the examination.	

	5.4.29 It is vital that applicants consider the need for compensation as early as possible in the design process as 'retrofitting' compensatory measures will introduce delays and uncertainty to the consenting process.	5.4.30 It is vital that applicants consider the need for compensation as early as possible in the design process as 'retrofitting' compensatory measures will introduce delays and uncertainty to the consenting process.	The **Shadow Habitats Regulations Assessment [APP/7.3]** concludes that, given the distance from the Order limits and the nature of the European sites, no impact pathways have been identified. None have been assessed to provide a risk of Likely Significant Effect either from the construction, operation and decommissioning of the Scheme or in combination with other plans and projects, such that an appropriate assessment is not required. Therefore, there are no environmental compensation requirements to be considered.
	5.4.30 Applicants should work closely at an early stage in the pre-application process with SNCB and Defra/Welsh Government to develop a compensation plan for all protected sites adversely affected by the development. Applicants should engage with the relevant Local Planning Authority at an early stage regarding the proposed location of compensatory measures. Applicants should also take account of any strategic plan level compensation plans in developing project level compensation plans.	5.4.31 Applicants should work closely at an early stage in the pre-application process with SNCB and Defra/Welsh Government to develop a compensation plan for all protected sites adversely affected by the development. Applicants should engage with the relevant Local Planning Authority at an early stage regarding the proposed location of compensatory measures. Applicants should also take into account any strategic plan-level compensation plans in developing project-level compensation plans.	As set out in Table 7-1 and 7-2 of **ES Chapter 7: Ecology and Biodiversity [APP/6.2],** the Applicant has engaged with Natural England and the Local Planning Authorities from an early stage in the pre-application process, including agreement of the statutory sites that should be considered within the HRA and mitigation measures that may be implemented to avoid significant effects to these sites.
	5.4.31 Before submitting an application, applicants should seek the views of the SNCB and Defra/Welsh Government as to the suitability, securability and effectiveness of the compensation plan to ensure the development will not hinder the achievement of the conservation objectives for the protected site. In cases where such views are provided, the applicant should include a copy of this information with the compensation plan in their application for further consideration by the Examining Authority.	5.4.32 Before submitting an application, applicants should seek the views of the SNCB and Defra/Welsh Government as to the suitability, securability and effectiveness of the compensation plan to ensure the development will not hinder the achievement of the conservation objectives for the protected site. In cases where such views are provided, the applicant should include a copy of this information with the compensation plan in their application for further consideration by the Examining Authority.	
Ancient woodland, ancient trees, veteran trees and other irreplaceable habitats	5.4.32 Applicants should include measures to mitigate fully the direct and indirect effects of development on ancient woodland, ancient and veteran trees or other irreplaceable habitats during both construction and operational phases.	5.4.33 Applicants should 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	Irreplaceable habitats (ancient and veteran trees) are to be retained with appropriate buffers. **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** confirms that there are no ancient woodlands contained within the Site. Woodland within the Site will be retained, with appropriate buffers, in the layout of the Scheme where practicable. With the exception of removals and/or crossings required for new access tracks, perimeter fencing and cabling. Impacts upon these habitats are considered within the **ES Chapter 7: Ecology and Biodiversity [APP/6.2].**
Protection and enhancement of habitats and species	5.4.33 Applicants should consider any reasonable opportunities to maximise the restoration, creation, and enhancement of wider biodiversity, and the protection and restoration of the ability of habitats to store or sequester carbon as set out under Section 4.6.	5.4.34 Applicants should consider any reasonable opportunities to maximise the restoration, creation, and enhancement of wider biodiversity, and the protection and restoration of the ability of habitats to store	As secured in the **oLEMP [APP/7.11],** new habitats will be provided as part of the Scheme, with the aim of improving biodiversity gains, where this does not conflict with construction, operational and decommissioning phases of the Scheme. Examples of habitat creation and enhancement measures to be implemented as part of the Scheme include:

		or sequester carbon as set out under Section 4.6.	• Creation of new grassland habitats, including wildflower grassland • The gapping up of hedgerows and Tree Lines with additional native species • Implementation of a rotational management strategy for hedgerows; and • The selective thinning and management of vegetation associated with ponds and ditches. As presented in the **Biodiversity Net Gain Assessment Report [APP/7.4],** the ecological mitigation and enhancement areas will deliver a net gain of 23.46% for onsite habitats, and a net gain of 58.78% for onsite hedgerow and tree lines while a requirement of the **draft DCO [APP/3.1]** commits to delivering a minimum net gain of 10% for onsite habitats, and a net gain of 10% for onsite hedgerow and tree lines. **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** confirms that, as relevant, legislation and guidance have been used to inform the Scheme's consideration of improvements and impacts on species.
	5.4.34 Consideration should be given to improvements to, and impacts on, habitats and species in, around and beyond developments, for wider ecosystem services and natural capital benefits, beyond those under protection and identified as being of principal importance. This may include considerations and opportunities identified through Local Nature Recovery Strategies, and national goals and targets set through the Environment Act 2021 and the Environmental Improvement Plan 2023.	5.4.35 Consideration should be given to improvements to, and impacts on, habitats and species in, around and beyond developments, for wider ecosystem services and natural capital benefits, beyond those under protection and identified as being of principal importance. This may include considerations and opportunities identified through Local Nature Recovery Strategies, and national goals and targets set through the Environment Act 2021 and the Environmental Improvement Plan.	
Mitigation	5.4.35 Applicants should include appropriate avoidance, mitigation, compensation and enhancement measures as an integral part of the proposed development. In particular, the applicant should demonstrate that: • during construction, they will seek to ensure that activities will be confined to the minimum areas required for the works; • the timing of construction has been planned to avoid or limit disturbance; • during construction and operation best practice will be followed to ensure that risk of disturbance or damage to species or habitats is minimised, including as a consequence of transport access arrangements; • habitats will, where practicable, be restored after construction works have finished; • opportunities will be taken to enhance existing habitats rather than replace them, and where practicable, create new habitats of value within the site landscaping proposals. Where habitat creation is required as mitigation, compensation, or enhancement, the location and quality will be of key importance. In this regard habitat creation should be focused on areas where the most ecological and	5.4.35 Applicants should include appropriate avoidance, mitigation, compensation and enhancement measures as an integral part of the proposed development. In particular, the applicant should demonstrate that: • during construction, they will seek to ensure that activities will be confined to the minimum areas required for the works; • the timing of construction has been planned to avoid or limit disturbance; • during construction and operation best practice will be followed to ensure that risk of disturbance or damage to species or habitats is minimised, including as a consequence of transport access arrangements; • habitats will, where practicable, be restored after construction works have finished; • opportunities will be taken to enhance existing habitats rather than replace them, and where practicable, create new habitats of value within the site landscaping proposals. Where habitat creation is required as mitigation, compensation, or enhancement, the location and quality will be of key	Regarding biodiversity and Geological Conservation, the mitigation hierarchy has been applied to the design of the Scheme to avoid, mitigate, and compensate (in that order) its effects on key biological and geological receptors. The **oCEMP [APP/7.6]** and the **oCTMP [APP/7.7]** secure management and control mechanisms to ensure that the construction activities are planned to avoid and minimise disturbance and that works take place in the most effective ways to minimise the impact of construction spatially. The **oOEMP [APP/7.8],** the **oOTMP [APP/7.9],** and the **oLEMP [APP/7.11]** apply across the operational phase of the Scheme and secure how the Site will be restored and enhanced post-construction. As secured in the **oLEMP [APP/7.11],** new habitats will be provided as part of the Scheme, with the aim of improving biodiversity gains, where this does not conflict with construction, operational and decommissioning phases of the Scheme. Examples of habitat creation and enhancement measures to be implemented as part of the Scheme include: • Creation of new grassland habitats, including wildflower grassland • The gapping up of hedgerows and Tree Lines with additional native species • Implementation of a rotational management strategy for hedgerows; and • The selective thinning and management of vegetation associated with ponds and ditches.

	ecosystems benefits can be realized; and • mitigations required as a result of legal protection of habitats or species will be complied with.	importance. In this regard habitat creation should be focused on areas where the most ecological and ecosystems benefits can be realized; and • mitigations required as a result of legal protection of habitats or species will be complied with.	
	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.	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.	Landscape and ecological enhancements and mitigation measures for the Scheme are shown on **Appendix 1: Green Infrastructure Strategy Plans** to the **oLEMP [APP/7.11]**. In addition, the **oCEMP [APP/7.6]** includes the requirement for contractors to provide training on relevant matters.
Secretary of State decision making	5.4.39 The government's 25 Year Environment Plan and the Environment Act 2021 mark a step change in ambition for wildlife and the natural environment. The Secretary of State should have regard to the aims and goals of the government's Environmental Improvement Plan 2023, and in Wales the objectives of the Nature Recovery Plan, and any relevant measures and targets, including statutory targets set under the Environment Act or elsewhere.	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 or elsewhere.	**ES Chapter 7: Ecology and Biodiversity [APP/6.2]** has been produced in accordance with the aims of the 25-Year Environment Plan and the Environment Act 2021, as evidenced by the extensive habitat provision secured under the **oLEMP [APP/7.11]**.
	5.4.41 The benefits of nationally significant low carbon energy infrastructure development may include benefits for biodiversity and geological conservation interests and these benefits may outweigh harm to these interests. The Secretary of State may take account of any such net benefit in cases where it can be demonstrated.	5.4.42 The benefits of nationally significant low carbon energy infrastructure development may include benefits for biodiversity and geological conservation interests and these benefits may outweigh harm to these interests. The Secretary of State may take account of any such net benefit in cases where it can be demonstrated.	As presented in the **Biodiversity Net Gain Assessment Report [APP/7.4],** the ecological mitigation and enhancement areas will deliver a net gain of 23.46% for onsite habitats, and a net gain of 58.78% for onsite hedgerow and tree lines while a requirement of the **draft DCO [APP/3.1]** commits to delivering a minimum net gain of 10% for onsite habitats, and a net gain of 10% for onsite hedgerow and tree lines.
	5.4.42 As a general principle, and subject to the specific policies below, development should, in line with the mitigation hierarchy, aim to avoid significant harm to biodiversity and geological conservation interests, including through consideration of reasonable alternatives (as set out in Section 4.3 above). Where significant harm cannot be avoided, impacts should be mitigated and as a last resort, appropriate compensation measures should be sought.	5.4.43 As a general principle, and subject to the specific policies below, development should, in line with the mitigation hierarchy, aim to avoid significant harm to biodiversity and geological conservation interests, including through consideration of reasonable alternatives (as set out in Section 4.3 above). Where significant harm cannot be avoided, impacts should be	With regard to Biodiversity and Geological Conservation, the design of the Scheme has applied the mitigation hierarchy to avoid, mitigate and compensate (in that order) its effects on key biological and geological receptors. Embedded mitigation measures relevant to biodiversity are secured through the **Design Principles, Parameters and Commitments [APP/5.8].** **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** describes the existing levels and assesses the anticipated ecology and biodiversity effects of the Scheme's construction, operational, and decommissioning. The chapter provides an assessment of the potential effects on internationally, nationally, and locally designated sites of ecological or geological importance, on protected species, and on

		mitigated and as a last resort, appropriate compensation measures should be sought.	habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats.
	5.4.43 If significant harm to biodiversity resulting from a development cannot be avoided (for example through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then the Secretary of State will give significant weight to any residual harm.	5.4.44 If significant harm to biodiversity resulting from a development cannot be avoided (for example through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then the Secretary of State will give significant weight to any residual harm.	**ES Chapter 7: Ecology and Biodiversity [APP/6.2]** concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse ecology and biodiversity related effects expected across the Scheme's construction, operational and decommissioning phases. **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse ecology and biodiversity related effects expected across the Scheme's construction, operational and decommissioning phases. As a result of embedded and additional mitigation and enhancement measures, there are three direct residual significant (in EIA terms) beneficial effects as a result of the Scheme, which are anticipated in relation to the following ecological features: hedgerows and lines of trees; breeding birds – other species; overwintering birds and amphibians – Great Crested Newt. The expected residual beneficial effects outlined in **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** rely on controls established in the **oCEMP [APP/7.6]**, **oOEMP [APP/7.8]**, **oDS [APP/7.10]** and the **oLEMP [APP/7.11]** and are secured via a requirement of the **draft DCO [APP/3.1]**. Section 7.7 of **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** outlines the mitigation measures relevant to biodiversity that are embedded in the Scheme, including but not limited to measures to prevent the accidental killing and injury of mammals, such as hedgehogs, which will be implemented during the construction and decommissioning phases. The Scheme includes measures to ensure that potential effects on light-sensitive species such as bats are fully mitigated.
	5.4.44 The Secretary of State should consider what appropriate requirements should be attached to any consent and/or in any planning obligations entered into, in order to ensure that any mitigation or biodiversity net gain measures, if offered, are delivered and maintained. Any habitat creation or enhancement delivered including linkages with existing habitats for compensation or biodiversity net gain should generally be maintained for a minimum period of 30 years, or for the lifetime of the project, if longer.	5.4.45 The Secretary of State should consider what appropriate requirements should be attached to any consent and/or in any planning obligations entered into, in order to ensure that any mitigation or biodiversity net gain measures, if offered, are delivered and maintained. Any habitat creation or enhancement delivered including linkages with existing habitats for compensation or biodiversity net gain should generally be maintained for a minimum period of 30 years, or for the lifetime of the project, if longer.	For biodiversity net gain, monitoring is detailed within and secured by the **oLEMP [APP/7.11].** After 30 years, monitoring would be reviewed to ensure habitat management prescriptions for the remainder of the operational (including maintenance) phase are appropriate.
	5.4.45 The Secretary of State will need to take account of what mitigation measures may have been agreed between the applicant and the SNCB and the MMO/NRW (where appropriate). The Secretary of State will also need to consider whether the SNCB or the MMO/NRW has granted or refused, or intends to grant or refuse, any relevant licences, including protected species mitigation licences.	5.4.46 The Secretary of State will need to take account of what mitigation measures may have been agreed between the applicant and the SNCB and the MMO/NRW (where appropriate). The Secretary of State will also need to consider whether the SNCB or the MMO/NRW has granted or refused, or intends to grant or refuse, any relevant licences, including protected species mitigation licences.	Section 7.3 of **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** outlines the stakeholder engagement conducted in relation to ecology and biodiversity, including engagement with Natural England. The **Consultation Report Appendices [APP/5.2],** submitted in support of the DCO Application, outline the feedback received from Natural England during non-statutory, statutory, and targeted consultations, as well as how the Applicant has taken each matter raised into account.

	5.4.46 Development proposals provide many opportunities for building-in beneficial biodiversity or geological features as part of good design. The Secretary of State should give appropriate weight to environmental and biodiversity enhancements, although any weight given to gains provided to meet a legal requirement (for example under the Environment Act 2021) is likely to be limited.	5.4.47 Development proposals provide many opportunities for building-in beneficial biodiversity or geological features as part of good design. The Secretary of State should give appropriate weight to environmental and biodiversity enhancements, although any weight given to gains provided to meet a legal requirement (for example under the Environment Act 2021) is likely to be limited.	As detailed in Section 2 of the **Planning Statement [APP/5.5]**, good design has been a fundamental consideration from the outset of the Scheme. The **Design Approach Document [APP/5.7]** demonstrates how the design of the Scheme has been developed in accordance with a clear design framework, based on the criteria for good design set out in NPS EN-1. This has included the adoption of project level design principles (Project Principles) to guide decision making and embed good design outcomes to the Scheme. The **Works Plan [APP/2.3]** and the **Design Principles, Parameters and Commitments [APP/5.8]** secure the design of the Scheme through the **draft DCO [APP/3.1].** As presented in the **Biodiversity Net Gain Assessment Report [APP/7.4],** the ecological mitigation and enhancement areas will deliver a net gain of 23.46% for onsite habitats, and a net gain of 58.78% for onsite hedgerow and tree lines while a requirement of the **draft DCO [APP/3.1]** commits to delivering a minimum net gain of 10% for onsite habitats, and a net gain of 10% for onsite hedgerow and tree lines. The Scheme has, therefore, taken advantage of opportunities to conserve and enhance biodiversity.
	5.4.47 When considering proposals, the Secretary of State should maximise such reasonable opportunities in and around developments, using requirements or planning obligations where appropriate. This can help towards delivering biodiversity net gain as part of or in addition to the approach set out at Section 4.6.	5.4.48 When considering proposals, the Secretary of State should maximise such reasonable opportunities in and around developments, using requirements or planning obligations where appropriate. This can help towards delivering biodiversity net gain as part of or in addition to the approach set out at Section 4.6.	
	5.4.48 In taking decisions, the Secretary of State should ensure that appropriate weight is attached to designated sites of international, national, and local importance; protected species; habitats and other species of principal importance for the conservation of biodiversity; and to biodiversity and geological interests within the wider environment.	5.4.49 In taking decisions, the Secretary of State should ensure that appropriate weight is attached to designated sites of international, national, and local importance; protected species; habitats and other species of principal importance for the conservation of biodiversity; and to biodiversity and geological interests within the wider environment.	**ES Chapter 7: Ecology and Biodiversity [APP/6.2]** has been produced taking due consideration for the appropriate weighting to be attached to designated sites of international, national and local importance; protected species; habitats and other species of principal importance for the conservation of biodiversity; and to biodiversity and geological interests within the wider environment. With the sensitivity weighting established, **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** undertakes an assessment which considers embedded and secured additional mitigation measures. The chapter concludes that there are no residual effects on ecology and biodiversity identified during the construction and decommissioning of the Scheme. While some moderate adverse residual effects have been identified, mitigation for these is set out in the **oLEMP [APP/7.11]** which is secured by a requirement of the **draft DCO [APP/3.1]**.
Secretary of State decision making – Habitats Regulations	5.4.49 The Secretary of State must consider whether the project is likely to have a significant effect on a protected site which is part of the National Site Network (a habitat site), a protected marine site, or on any site to which the same protection is applied as a matter of policy, either alone or in combination with other plans or projects.	5.4.51 The Secretary of State must consider whether the project is likely to have a significant effect on a protected site which is part of the National Site Network (a habitat site), a protected marine site, or on any site to which the same protection is applied as a matter of policy, either alone or in combination with other plans or projects.	A **Shadow Habitats Regulations Assessment [APP/7.3]** has been prepared in accordance with the requirements of 'The Conservation of Habitats and Species Regulations 2017 (Habitats Regulations)' to set out whether the Scheme is likely to have any significant effect on European designated sites. This report is submitted in support of the DCO Application. This concludes that, given the distance from the Order Limits and the nature of the European sites, no impact pathways have been identified and none have been assessed to provide a risk of Likely Significant Effect either from the construction, operation and decommissioning of the Scheme or in combination with other plans and projects, such that an appropriate assessment is not required.
Secretary of State decision making – Sites of Special Scientific Interest (SSSIs)	5.4.50 The Secretary of State should use requirements and/or planning obligations to mitigate the harmful aspects of the development and, where possible, to ensure the conservation and enhancement of the site's biodiversity or geological interest.	5.4.52 The Secretary of State should use requirements and/or planning obligations to mitigate the harmful aspects of the development and, where possible, to ensure the conservation and enhancement	There are no SSSIs located on the land within the Order limits, nor is it located immediately adjacent to any statutory ecological designations, the closest of which is the River Nar SSSI, which is located approximately 0.27km north of the Site and Castle Acre Common SSSI, which is located approximately 0.44km north of the Site. No direct or indirect impacts on River Nar SSSI and Castle Acre Common SSSI are anticipated for the construction, operational, and decommissioning phases of the Scheme, given its distance from the Order limits. **ES Chapter 7: Ecology and**

		of the site's biodiversity or geological interest.	**Biodiversity [APP/6.2]** includes an assessment of the likely significant effects on SSSIs and concludes that, with appropriate mitigation, no significant adverse effects are anticipated.
Secretary of State decision making – Regional and Local Sites	5.4.52 The Secretary of State should give due consideration to regional or local designations. However, given the need for new nationally significant infrastructure, these designations should not be used in themselves to refuse development consent.	5.4.54 The Secretary of State should give due consideration to regional or local designations. However, given the need for new nationally significant infrastructure, these designations should not be used in themselves to refuse development consent.	There is a single non-statutory ecological designation, Roadside Nature Reserve (RNR, ref. U33086), located along River Road within the Order limits, situated along the highway verge between individual parcels of Solar PV. No direct or indirect impacts on River Road RNRs are anticipated for the construction, operational and decommissioning phases of the Scheme, given outside of the works area or the Order limits itself. Ecological buffers have been incorporated into the design of the Scheme from an early stage to mitigate adverse impacts, including damage to existing vegetation and the implementation of the **oCEMP [APP/7.6]**.
Secretary of State decision making – Ancient woodland, ancient trees, veteran trees and other irreplaceable habitats	5.4.53 The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists.	5.4.55 The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists.	Based on **ES Appendix 16.4: Arboricultural Impact Assessment [APP/6.4]**, there are 16 (possibly/likely) veteran trees. No direct or indirect impacts on veteran and/or ancient trees and ancient woodland are anticipated for the construction, operational and decommissioning phases of the Scheme, given the retention of individual trees has been designed into the Scheme (including through routing of access via existing field entrances and access points), with suitable buffers of 15x stem diameter, to be maintained except as specified by detailed arboricultural advice. Therefore, no direct permanent loss of ancient woodland, other woodland, veteran and/or ancient trees within the Order limits is anticipated as all access, hardware and cabling installation will either avoid the woodland habitats which occur within and adjacent to the Site. Mitigation is proposed to avoid and reduce impacts on existing woodland features. The Scheme has been carefully designed to avoid veteran trees and woodland through embedded mitigation, including tree buffer zones to avoid soil disturbance, micrositing to avoid root and canopy impacts. Furthermore, any effects would be temporary and likely limited to the woodland margins, while embedded mitigation measures are proposed (as outlined in the **oCEMP [APP/7.6]**), which will further mitigate any potential effects.
Secretary of State decision making – Protection and enhancement of habitats and species	5.4.54 The Secretary of State should ensure that species and habitats identified as being of importance for the conservation of biodiversity are protected from the adverse effects of development by using requirements, planning obligations, or licence conditions where appropriate.	5.4.56 The Secretary of State should ensure that species and habitats identified as being of importance for the conservation of biodiversity are protected from the adverse effects of development by using requirements, planning obligations, or licence conditions where appropriate.	**ES Chapter 7: Ecology and Biodiversity [APP/6.2]** describes the existing levels and assesses the anticipated ecology and biodiversity effects of the Scheme's construction, operational, and decommissioning. The chapter provides an assessment of the potential effects on internationally, nationally, and locally designated sites of ecological or geological importance, on protected species, and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats. The chapter concludes that there are no residual effects on ecology and biodiversity identified during the construction and decommissioning of the Scheme. While some moderate adverse residual effects have been identified, mitigation for these is set out in the **oLEMP [APP/7.11]** which is secured by a requirement of the **draft DCO [APP/3.1]**. The chapter also concludes that there is no harm to protected species and relevant habitats during the construction, operation, or decommissioning of the Scheme. Appropriate monitoring will be undertaken during construction, operation and decommissioning as set out and secured in the **oCEMP [APP/7.6]**, **oOEMP [APP/7.8]**, **oDS [APP/7.10]** and the **oLEMP [APP/7.11],** and are secured via corresponding requirements of the **draft DCO [APP/3.1]**.
	5.4.55 The Secretary of State should refuse consent where harm to a protected species and relevant habitat would result, unless there is an overriding public interest and the other relevant legal tests are met. In this context the Secretary of State should give substantial weight to any such harm to the detriment of biodiversity features of national or regional importance or the climate resilience and the capacity of	5.4.57 The Secretary of State should refuse consent where harm to a protected species and relevant habitat would result, unless there is an overriding public interest and the other relevant legal tests are met. In this context the Secretary of State should give substantial weight to any such harm to the detriment of biodiversity features of national or regional importance or the climate resilience and the capacity of habitats to	

	habitats to store carbon, which they consider may result from a proposed development.	store carbon, which they consider may result from a proposed development.	
5.5 - Civil and military aviation and defence interests ***Applicant Assessment***	5.5.37 Where the proposed development may affect the performance of civil or military aviation CNS, meteorological radars and/or other defence assets an assessment of potential effects should be set out in the ES (see Section 4.3).	5.5.38 Where the proposed development may affect the performance of civil or military aviation CNS, meteorological radars and/or other defence assets an assessment of potential effects should be set out in the ES (see Section 4.3).	As set out in **ES Appendix 2.1: EIA Scoping Opinion Request [APP/6.4]** and agreed by PINS in **ES Appendix 2.2: Scoping Opinion Response [APP/6.4]**, an individual Glint and Glare chapter is not required in the ES. **ES Chapter 16: Other Environmental Matters [APP/6.2]** assesses glint and glare effects in respect of those matters that are scoped in. The locations of relevant receptors are shown within the supporting **ES Appendix 16.2: Solar Photovoltaic Glint and Glare Study [APP/6.4].** **ES Chapter 16: Other Environmental Matters [APP/6.2]** concludes that, with embedded mitigation measures in place, there is no potential for significant glint and glare effects as a result of the Scheme's construction, operational and decommissioning phases. As set out in **ES Chapter 16: Other Environmental Matters [APP/6.2],** glint and glare effects in respect of those matters that are scoped in include, but are not limited to: • RAF Marham and Great Friars Thornes Farm Airfield; and • East Winch Airfield and Great Massingham Airfield (aviation infrastructure outside of the 5km and 10km Study Areas). Prior to the implementation of any mitigation, the Scheme has the potential to affect glint and glare during the construction, operational and/or decommissioning phases by PV panels reflecting sunlight, causing glint and glare towards Air Traffic Control (ATC) towers and aircraft on approach to nearby airfields, potentially disrupting visibility for ATC personnel and pilots, posing safety risks. Solar reflections with 'potential for temporary after-image' are predicted to be geometrically possible towards the ATC Tower at RAF Marham for the Fixed South Facing PV Array configuration; however, consideration of Zones of Theoretical Visibility (ZTV) modelling indicates that views of the site are unlikely to be possible in practice. Consultation with the Ministry of Defence (MOD) is ongoing to confirm whether views of the site are possible from the ATC tower, to understand their position on the development, and whether this level of glare may be considered operationally accommodable. No significant impacts are predicted on aviation activity at both East Winch Airfield and Great Massingham Airfield. The Applicant has requested further information regarding the Precision Approach Radar (PAR), in order to conduct its own analysis and identify whether there may be feasible mitigation options which can avoid the removal of solar PV areas from the entirety of the technical safeguarding zone for the PAR. The Applicant is still awaiting this information and will conduct the analysis once received. The Applicant will continue to engage with the MOD regarding this concern and seek to work towards an acceptable form of mitigation. As set out in the **Consultation Report [APP/5.1]** has been in ongoing engagement with the MOD regarding design changes as a result of the consultation**.**
	5.5.38 The requirement for ATC and non-cooperative surveillance – i.e. radar/tracking technologies – forms part of the environmental baseline for proposed developments.	5.5.39 The requirement for ATC and non-cooperative surveillance – i.e. radar/tracking technologies – forms part of the environmental baseline for proposed developments.	
	5.5.39 The applicant should consult the MOD, Met Office, Civil Aviation Authority (CAA), NATS and any aerodrome – licenced or otherwise – likely to be affected by the proposed development in preparing an assessment of the proposal on aviation, meteorological or other defence interests.	5.5.40 The applicant should consult the MOD, Met Office, Civil Aviation Authority (CAA), NATS and any aerodrome – licenced or otherwise – likely to be affected by the proposed development in preparing an assessment of the proposal on aviation, meteorological or other defence interests.	
	5.5.40 Any assessment of effects on aviation, meteorological or other defence interests should include potential impacts of the project upon the operation of CNS infrastructure, flight patterns (both civil and military), generation of weather warnings and forecasts, other defence assets (including radar) and aerodrome operational procedures. It should also assess the demonstratable cumulative effects201 of the project with other relevant projects in relation to aviation, meteorological and defence.	5.5.41 Any assessment of effects on aviation, meteorological or other defence interests should include potential impacts of the project upon the operation of CNS infrastructure, flight patterns (both civil and military), generation of weather warnings and forecasts, other defence assets (including radar) and aerodrome operational procedures. It should also assess the demonstratable cumulative effects179 of the project with other relevant projects in relation to aviation, meteorological and defence.	
	5.5.41 In addition, consideration of developments near aerodromes should take into account the following factors: • Bird Strike Risk – Aircraft are vulnerable to wildlife strike, in particular bird strike. Birds and other wildlife may be attracted to the vicinity of an aerodrome by various types of development, for example, large buildings with perching/roosting opportunities for birds. It is therefore important that infrastructure, buildings and other elements from energy installations, as well as environmental mitigation and enhancement are designed in such a way so as not to increase the bird	5.5.42 In addition, consideration of developments near aerodromes should take into account the following factors: • Bird Strike Risk – Aircraft are vulnerable to wildlife strike, in particular bird strike. Birds and other wildlife may be attracted to the vicinity of an aerodrome by various types of development, for example, large buildings with perching/roosting opportunities for birds. It is therefore important that infrastructure, buildings and other elements from energy installations, as well as environmental mitigation and enhancement are	

	strike risk to the airport for developments within 13km (this can vary). • Building Induced Turbulence – If a significant building or structure is proposed close to the airport/runways, there is potential for building induced turbulence/wind shear to be created which has the potential to impact on aircraft on take-off and landing. Studies may be required to identify the extent of any turbulence resulting from the energy infrastructure. • Thermal Plume Turbulence – This is caused under certain conditions by the release of hot air from a power plant equipped with a dry cooling system. The plumes generated by these facilities have the potential to create invisible turbulence that can affect the manoeuvrability of aircraft.	designed in such a way so as not to increase the bird strike risk to the airport for developments within 13km (this can vary). • Building Induced Turbulence – If a significant building or structure is proposed close to the airport/runways, there is potential for building induced turbulence/wind shear to be created which has the potential to impact on aircraft on take-off and landing. Studies may be required to identify the extent of any turbulence resulting from the energy infrastructure. • Thermal Plume Turbulence – This is caused under certain conditions by the release of hot air from a power plant equipped with a dry cooling system. The plumes generated by these facilities have the potential to create invisible turbulence that can affect the manoeuvrability of aircraft.	**ES Chapter 7: Ecology and Biodiversity [APP/6.2]** considers the impacts of the Scheme on birds. The Scheme does not propose significant buildings or structures; therefore, turbulence has not been assessed. Thermal Plume Turbulence is not considered relevant as the Scheme does not propose dry cooling systems.
	5.5.42 If any relevant changes are made to proposals during the pre-application and determination period, it is the responsibility of the applicant to ensure that the relevant aviation, meteorological and defence consultees are informed as soon as reasonably possible.	5.5.43 If any relevant changes are made to proposals during the preapplication and determination period, it is the responsibility of the applicant to ensure that the relevant aviation, meteorological and defence consultees are informed as soon as reasonably possible.	
Mitigation	5.5.43 The applicant should include appropriate mitigation measures as an integral part of the proposed development.	5.5.44 The applicant should include appropriate mitigation measures as an integral part of the proposed development.	Embedded mitigation measures have been included in the **ES Appendix 16.2: Solar Photovoltaic Glint and Glare Study [APP/6.4]** and are secured in the **oLEMP [APP/7.11]**. Advanced planting and hedgerow enhancement will be undertaken during winter 2025 and are to be completed during winter 2026 along the eastern boundary of the Site, as outlined in **Appendix 3: Advanced Planting Plan** of the **oLEMP [APP/7.11].**
	5.5.44 litigation for infringement of OLS may include: • agreed changes to operational procedures of the aerodromes in accordance with relevant guidance, provided that safety assurances can be provided by the operator that are acceptable to the CAA where the changes are proposed to a civilian aerodrome. Applicants should engage airport operators at an early stage of the planning process to understand the potential impacts of development on aviation operations and develop mitigations if appropriate; or • installation of obstacle lighting and/or by notification in Aeronautical Information Service publications	5.5.44 litigation for infringement of OLS may include: • agreed changes to operational procedures of the aerodromes in accordance with relevant guidance, provided that safety assurances can be provided by the operator that are acceptable to the CAA where the changes are proposed to a civilian aerodrome. Applicants should engage airport operators at an early stage of the planning process to understand the potential impacts of development on aviation operations and develop mitigations if appropriate; or	

		• installation of obstacle lighting and/or by notification in Aeronautical Information Service publications	
Secretary of State decision making	5.5.49 The Secretary of State should be satisfied that the effects on meteorological radars, civil and military aerodromes, aviation technical sites and other defence assets or operations have been addressed by the applicant and that any necessary assessment of the proposal on aviation, NSWWS or defence interests has been carried out.	5.5.50 The Secretary of State should be satisfied that the effects on meteorological radars, civil and military aerodromes, aviation technical sites and other defence assets or operations have been addressed by the applicant and that any necessary assessment of the proposal on aviation, NSWWS or defence interests has been carried out.	As set out in **ES Appendix 2.1: EIA Scoping Opinion Request [APP/6.4]** and agreed by PINS in **ES Appendix 2.2: Scoping Opinion Response [APP/6.4]**, an individual Glint and Glare chapter is not required in the ES. **ES Chapter 16: Other Environmental Matters [APP/6.2]** assess glint and glare effects in respect of those matters that are scoped in. The locations of relevant receptors are shown within the supporting **ES Appendix 16.2: Solar Photovoltaic Glint and Glare Study [APP/6.4].** **ES Chapter 16: Other Environmental Matters [APP/6.2]** concludes that, with embedded mitigation measures in place, there is no potential for significant glint and glare effects as a result of the Scheme's construction, operational and decommissioning phases. Embedded mitigation measures have been included in the **ES Appendix 16.2:Solar Photovoltaic Glint and Glare Study [APP/6.4]**. Advanced planting and hedgerow enhancement will be undertaken during winter 2025 and are to be completed during winter 2026 along the eastern boundary of the Site, as outlined in **Appendix 3: Advanced Planting Plan** of the **oLEMP [APP/7.11].** As set out in **ES Chapter 16: Other Environmental Matters [APP/6.2],** glint and glare effects in respect of those matters that are scoped in include, but are not limited to: • RAF Marham and Great Friars Thornes Farm Airfield; and • East Winch Airfield and Great Massingham Airfield (aviation infrastructure outside of the 5km and 10km Study Areas). Prior to the implementation of any mitigation, the Scheme has the potential to affect glint and glare during the construction, operational and/or decommissioning phases by PV panels reflecting sunlight, causing glint and glare towards Air Traffic Control (ATC) towers and aircraft on approach to nearby airfields, potentially disrupting visibility for ATC personnel and pilots, posing safety risks. Solar reflections with 'potential for temporary after-image' are predicted to be geometrically possible towards the ATC Tower at RAF Marham for the Fixed South Facing PV Array configuration; however, consideration of Zones of Theoretical Visibility (ZTV) modelling indicates that views of the site are unlikely to be possible in practice. Consultation with the MOD is ongoing to confirm whether views of the site are possible from the ATC tower, to understand their position on the development, and whether this level of glare may be considered operationally accommodable.
	5.5.50 In particular, the Secretary of State should be satisfied that the proposal has been designed, where possible, to minimise adverse impacts on the operation and safety of aerodromes and that realistically achievable mitigation is carried out on existing surveillance systems such as radar/tracking technologies. It is incumbent on Operators of aerodromes to regularly review the possibility of agreeing to make reasonable changes to operational procedures.	5.5.51 In particular, the Secretary of State should be satisfied that the proposal has been designed, where possible, to minimise adverse impacts on the operation and safety of aerodromes and that realistically achievable mitigation is carried out on existing surveillance systems such as radar/tracking technologies. It is incumbent on Operators of aerodromes to regularly review the possibility of agreeing to make reasonable changes to operational procedures.	
	5.5.53 If there are conflicts between the government's energy and transport policies and military interests in relation to the application, the Secretary of State should expect the relevant parties to have made appropriate efforts to work together to identify realistic and pragmatic solutions to the conflicts. In so doing, the parties should seek to protect the aims and interests of the other parties as far as possible, recognising simultaneously the evolving landscape in terms of the UK's energy security and the need to tackle climate change, which necessitates the installation of wind turbines and the need to maintain air safety and national defence and the national weather warning service.	5.5.54 If there are conflicts between the government's energy and transport policies and military interests in relation to the application, the Secretary of State should expect the relevant parties to have made appropriate efforts to work together to identify realistic and pragmatic solutions to the conflicts. In so doing, the parties should seek to protect the aims and interests of the other parties as far as possible, recognising simultaneously the evolving landscape in terms of the UK's energy security and the need to tackle climate change, which necessitates the installation of wind turbines, and the need to maintain air safety and national defence and the national weather warning service.	

	5.5.55 Lighting must also be designed in such a way as to ensure that there is no glare or dazzle to pilots and/or ATC, aerodrome ground lighting is not obscured and that any lighting does not diminish the effectiveness of aeronautical ground lighting and cannot be confused with aeronautical lighting. Lighting may also need to be compatible with night vision devices for military low flying purposes.	5.5.55 There are statutory requirements concerning lighting to tall structures. Where lighting is requested on structures that goes beyond statutory requirements by any of the relevant aviation and defence consultees, the Secretary of State should be satisfied of the necessity of such lighting taking into account the case put forward by the consultees. The effect of such lighting on the landscape and ecology may be a relevant consideration.	No significant impacts are predicted on aviation activity at both East Winch Airfield and Great Massingham Airfield.
	5.5.59 Where, after reasonable mitigation, operational changes, obligations and requirements have been proposed, the Secretary of State should consider whether: • a development would prevent a licenced aerodrome from maintaining its licence and the defence, or result in substantial local/national economic loss, or emergency service needs • it would cause harm to aerodromes' training or emergency service needs • the development would impede or compromise the safe and effective use of defence assets or unacceptably limit military training • the development would have a negative impact on the safe and efficient provision of en-route air traffic control services for civil aviation, in particular through an adverse effect on CNS infrastructure • the development would compromise the effective provision of weather warnings by the NSWWS, or flood warnings by the UK's flood agencies	5.5.60 Where, after reasonable mitigation, operational changes, obligations and requirements have been proposed, the Secretary of State should consider whether: • a development would prevent a licenced aerodrome from maintaining its licence and the defence, or result in substantial local/national economic loss, or emergency service needs • it would cause harm to aerodromes' training or emergency service needs • the development would impede or compromise the safe and effective use of defence assets or unacceptably limit military training • the development would have a negative impact on the safe and efficient provision of en-route air traffic control services for civil aviation, in particular through an adverse effect on CNS infrastructure • the development would compromise the effective provision of weather warnings by the NSWWS, or flood warnings by the UK's flood agencies	
5.7 - Dust, odour, artificial light, smoke, steam and insect infestation ***Applicant Assessment***	5.7.5 The applicant should assess the potential for insect infestation and emissions of odour, dust, steam, smoke, and artificial light to have a detrimental impact on amenity, as part of the ES.	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.	A **Construction and Decommissioning Phase Dust Assessment** has been produced to determine the level of mitigation required to control dust and particulate matter emission for inclusion in the **oCEMP [APP/7.6]** submitted as part of the DCO Application. A **Battery Plume Assessment** has been produced and appended to the **oBSMP [APP/7.14],** which considers combustion emissions in the event of a battery fire. The **oBSMP [APP/7.14]** sets out the safety measures proposed to be installed to reduce fire risk, as well as fire protection measures. The Scheme is not anticipated to cause any effects from insect infestation, steam or odour. Construction and decommissioning activities will be undertaken using best practice measures to minimise emissions, as set out in the **oCEMP [APP/7.6]** and
	5.7.6 In particular, the assessment provided by the applicant should describe: • the type, quantity, and timing of emissions; • aspects of the development which may give rise to emissions;	5.7.6 In particular, the assessment provided by the applicant should describe: • the type, quantity, and timing of emissions; • aspects of the development which may give rise to emissions;	

	• premises or locations that may be affected by the emissions; • effects of the emission on identified premises or locations; • measures to be employed in preventing or mitigating the emissions	• premises or locations that may be affected by the emissions; • effects of the emission on identified premises or locations; • measures to be employed in preventing or mitigating the emissions	**oDS [APP/7.10]**. All of these management plans are secured via their corresponding requirements in the **dDCO [APP/3.1]**.
	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.	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.	Section 16.2 of **Chapter 16: Other Environmental Matters [APP/6.2]** sets out that the Applicant has been in consultation with Breckland Council and the Environment Agency in relation to air quality.
Mitigation	5.7.8 Mitigation measures may include one or more of the following: • engineering: prevention of a specific emission at the point of generation; control, containment and abatement of emissions if generated; • lay-out: adequate distance between source and sensitive receptors; reduced transport or handling of material; • administrative: limiting operating times; restricting activities allowed on the site; implementing management plans.	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.	A **Construction and Decommissioning Phase Dust Assessment** has been produced to determine the level of mitigation required to control dust and particulate matter emission for inclusion in the **oCEMP [APP/7.6]** submitted as part of the DCO Application. Dust emissions associated with construction activities will be controlled through mitigation measures outlined in the **oCEMP [APP/7.6].** With the inclusion of the mitigation outlined in the **oCEMP [APP/7.6]** and the **oDS [APP/7.11],** potential dust emissions associated with on-site activities during the construction and decommissioning phases are not anticipated to be significant. Vehicle traffic emissions produced during the Construction phase, including exhaust and non-exhaust emissions such as brake and tyre wear, as well as measures to minimise dust emissions arising from vehicles entering and leaving the Site, will be controlled through mitigation measures specified in the **oCTMP [APP/7.7].** It is not expected that vehicle movements associated with the decommissioning phase will exceed the vehicle movements calculated for the construction phase. Confirmation that all Non-Road Mobile Machinery (NRMM) used will adhere to the latest emissions standards in line with European regulations (EU 2016/1628) is included in the **oCEMP [APP/7.6],** submitted in support of the DCO Application. With these measures in place, the significant effects resulting from NRMM emissions are unlikely. The **oCEMP [APP/7.6], oCTMP [APP/7.7]** and the **oDS [APP/7.10]** are secured via requirements of the **draft DCO [APP/3.1].**
	5.7.9 Construction should be undertaken in a way that reduces emissions, for example the use of low emission mobile plant during the construction, and demolition phases as appropriate, and consideration should be given to making these mandatory in Development Consent Order requirements.	5.7.9 Construction should be undertaken in a way that reduces emissions, for example the use of low emission mobile plant during the construction, and demolition phases as appropriate, and consideration should be given to making these mandatory in Development Consent Order requirements.	
	5.7.10 Demolition considerations should be embedded into designs at the outset to enable demolition techniques to be adopted that remove the need for explosive demolition.	5.7.10 Demolition considerations should be embedded into designs at the outset to enable demolition techniques to be adopted that remove the need for explosive demolition.	
	5.7.11 A construction management plan may help clarify and secure mitigation.	5.7.11 A construction management plan may help clarify and secure mitigation.	
Secretary of State decision making	5.7.12 The Secretary of State should satisfy itself that: • an assessment of the potential for artificial light, dust, odour, smoke, steam and insect infestation to have a	5.7.12 The Secretary of State should satisfy itself that: • an assessment of the potential for artificial light, dust, odour, smoke, steam and insect infestation to have	A **Construction and Decommissioning Phase Dust Assessment** has been produced to determine level of mitigation required to control dust and particulate matter emission for inclusion in the **oCEMP [APP/7.6]** submitted as part of the DCO Application. The Scheme is not anticipated to cause any effects from insect infestation, steam or odour. Construction and decommissioning activities will be undertaken using best

	detrimental impact on amenity has been carried out • that all reasonable steps have been taken, and will be taken, to minimise any such detrimental impacts	a detrimental impact on amenity has been carried out • that all reasonable steps have been taken, and will be taken, to minimise any such detrimental impacts	practice measures to minimise emissions, as set out in the **oCEMP [APP/7.6]** and **oDS [APP/7.10]**. All relevant assessments covering artificial light, dust, odour, smoke, steam and insect infestation have been considered across the **ES [APP/6.1-6.5]**
	5.7.13 If development consent is granted for a project, the Secretary of State should consider whether there is a justification for all of the authorised project (including any associated development) to be covered by a defence of statutory authority against nuisance claims. If the Secretary of State cannot conclude that this is justified, the Secretary of State should disapply in whole or in part the defence through a provision in the Development Consent Order.	5.7.13 If development consent is granted for a project, the Secretary of State should consider whether there is a justification for all of the authorised project (including any associated development) to be covered by a defence of statutory authority against nuisance claims. If the Secretary of State cannot conclude that this is justified, the Secretary of State should disapply in whole or in part the defence through a provision in the Development Consent Order.	The Applicant has prepared and submitted a **Statutory Nuisance Statement [APP/5.3]** as is required under APFP Regulation 5(2)(f) and Paragraph 4.15.5 of NPS EN-1. The **Statutory Nuisance Statement [APP/5.3]** draws upon the assessment conclusions from **ES Chapter 16: Other Environmental Matters** and **ES Chapter 10: Noise and Vibration [APP/6.2]** to set out that the construction, operational and decommissioning phases of the Scheme would not cause a statutory nuisance. **Article 7** of the **draft DCO [APP/3.1]** deals with defence to proceedings in respect of statutory nuisance. It provides that no person is able to bring statutory nuisance proceedings under the EPA 1990 in respect of noise, if the noise is created in the course of carrying out construction, maintenance or decommissioning of the authorised development and for which notice has been given under section 60 or consent obtained under section 61(9) of the Control of Pollution Act 1974 or which cannot be reasonably avoided as a consequence of the authorised development. This approach is precedented in all made solar DCOs to date, including the recent 'The Tillbridge Solar Order 2025' and 'The Stonestreet Green Solar Order 2025'.
	5.7.14 Where the Secretary of State believes it appropriate, the Secretary of State may consider attaching requirements to the development consent, to secure certain mitigation measures.	5.7.14 Where the Secretary of State believes it appropriate, the Secretary of State may consider attaching requirements to the development consent, to secure certain mitigation measures.	The Applicant considers that all relevant mitigation measures have been secured via the suite of management plans and other secured documents within the **draft DCO [APP/3.1].**
	5.7.15 In particular, the Secretary of State should consider whether to require the applicant to abide by a scheme of management and mitigation concerning insect infestation and emissions of odour, dust, steam, smoke, and artificial light from the development. The Secretary of State should consider the need for such a scheme to reduce any loss to amenity which might arise during the construction, operation and decommissioning of the development. A construction management plan may help codify mitigation at that stage.	5.7.15 In particular, the Secretary of State should consider whether to require the applicant to abide by a scheme of management and mitigation concerning insect infestation and emissions of odour, dust, steam, smoke, and artificial light from the development. The Secretary of State should consider the need for such a scheme to reduce any loss to amenity which might arise during the construction, operation and decommissioning of the development. A construction management plan may help codify mitigation at that stage.	
Part 5.8 - Flood Risk	5.8.12 Development should be designed to ensure there is no increase in flood risk elsewhere, accounting for the predicted impacts of climate change throughout the lifetime of the development. There should be no net loss of floodplain storage and any deflection or constriction of flood flow routes should be safely	5.8.12 Development should be designed to ensure there is no increase in flood risk elsewhere, accounting for the predicted impacts of climate change throughout the lifetime of the development. There should be no net loss of floodplain storage and any deflection or constriction of flood flow routes	**ES Chapter 12: Water Resources [APP/6.2]** confirms that the entirety of the built aspects of the Scheme (Works No. 1-10) is situated in Flood Zone 1; only a small area of the Skylark Mitigation Works No. 11 (approximately 1.1 ha) is within the Flood Zone 2 and 3, which will continue to be used for agricultural activities; therefore, the Sequential Test is not triggered.

	managed within the site. Mitigation measures should make as much use as possible of natural flood management techniques.	should be safely managed within the site. Mitigation measures should make as much use as possible of natural flood management techniques.	**ES Chapter 12: Water Resources [APP/6.2]** assess the impacts of the Scheme on water quality, water bodies or protected areas, and concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse water effects expected across the Scheme's construction, operational and decommissioning phases on water quality, water bodies or protected areas. The non-significant residual effects outlined in the assessment rely on controls established within the **oCEMP [APP/7.6], oOEMP [APP/7.8],** the **FRA [APP/6.4]** and the **oDS [APP/7.10].** These outline management plans and the Surface Water Drainage Strategy, which is embedded in the **FRA [APP/6.4]** set out the water-related measures to manage any potential water effects that may arise from the Scheme's construction, operational and decommissioning phases. The DCO Application is supported by **ES Appendix 12.2: FRA [APP/6.4]** which addresses each requirement of NPS EN-1 Paragraph 5.8.13**.** As set out in the **FRA [APP/6.4],** surface water runoff from the Solar PV will be managed through Rural SuDS and Natural Flood Management techniques such as grassland/wildflower areas, which will act to bind soils, slow surface water, and increase water quality compared to the baseline scenario. The **FRA [APP/6.4]** includes a Surface Water Drainage Strategy, which sets out how surface water runoff from the Site will be managed in line with the national, regional and local requirements regarding flood risk and drainage. As the Scheme does not have a detailed layout, a detailed drainage strategy cannot be provided at this stage, with the principles and design criteria presented in this document. These criteria will be applied during the detailed design phase, and the detailed SuDS will be secured in the DCO through a Requirement of the **draft DCO [APP/3.1].** **The Design Approach Document [APP/5.7]** includes the adoption of project level design principles (Project Principles) to guide decision making and embed good design outcomes in the Scheme. Principle 4.3 ensures the Scheme is resilient to flooding and does not increase flooding elsewhere. **The Design Principles, Parameters and Commitments [APP/5.8]** requires the Applicant at the detailed design stage to further consider water runoff with respect to: • the final location of the BESS Compound and layout of the BESS Containers • the final location of the Customer Substation Compound and layout; and • the final location of the National Grid Substation Compound and layout.
Application Assessment	5.8.13 A site-specific flood risk assessment should be provided for all energy projects in Flood Zones 2 and 3 in England or Zones B and C in Wales. In Flood Zone 1 in England or Zone A in Wales, an assessment should accompany all proposals involving: • sites of 1 hectare or more • land which has been identified by the EA or NRW as having critical drainage problems • land identified (for example in a local authority strategic flood risk assessment) as being at increased flood risk in future • land that may be subject to other sources of flooding (for example surface water) • where the EA or NRW, Lead Local Flood Authority, Internal Drainage Board or other body have indicated that there may be drainage problems.	5.8.13 A site-specific flood risk assessment should be provided for all energy projects in Flood Zones 2 and 3 in England or Zones B and C in Wales. In Flood Zone 1 in England or Zone A in Wales, an assessment should accompany all proposals involving: • sites of 1 hectare or more • land which has been identified by the EA or NRW as having critical drainage problems • land identified (for example in a local authority strategic flood risk assessment) as being at increased flood risk in future • land that may be subject to other sources of flooding (for example surface water) • where the EA or NRW, Lead Local Flood Authority, Internal Drainage Board or other body have indicated that there may be drainage problems.	
	5.8.14 This assessment should identify and assess the risks of all forms of flooding to and from the project and demonstrate how these flood risks will be managed, taking climate change into account.	5.8.14 This assessment should identify and assess the risks of all forms of flooding to and from the project and demonstrate how these flood risks will be managed, taking climate change into account.	
	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	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;	

	channels, flood storage areas and other artificial features, together with the consequences of their failure and exceedance; • consider the vulnerability of those using the site, including arrangements for safe access and escape; • consider and quantify the different types of flooding (whether from natural and human sources and including joint and cumulative effects) and include information on flood likelihood, speed-of-onset, depth, velocity, hazard and duration; • identify and secure opportunities to reduce the causes and impacts of flooding overall, making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management; • consider the effects of a range of flooding events including extreme events on people, property, the natural and historic environment and river and coastal processes; • include the assessment of the remaining (known as 'residual') risk after risk reduction measures have been taken into account and demonstrate that these risks can be safely managed, ensuring people will not be exposed to hazardous flooding; • consider how the ability of water to soak into the ground may change with development, along with how the proposed layout of the project may affect drainage systems. Information should include: i. Describe the existing surface water drainage arrangements for the site ii. Set out (approximately) the existing rates and volumes of surface water run-off generated by the site. Detail the proposals for restricting discharge rates iii. Set out proposals for managing and discharging surface water from the site using sustainable drainage systems and accounting for the predicted impacts of climate change. If sustainable drainage systems have been	• consider both the potential adverse and beneficial effects of flood risk management infrastructure, including raised defences, flow channels, flood storage areas and other artificial features, together with the consequences of their failure and exceedance; • consider the vulnerability of those using the site, including arrangements for safe access and escape; • consider and quantify the different types of flooding (whether from natural and human sources and including joint and cumulative effects) and include information on flood likelihood, speed-of-onset, depth, velocity, hazard and duration; • identify and secure opportunities to reduce the causes and impacts of flooding overall, making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management; • consider the effects of a range of flooding events including extreme events on people, property, the natural and historic environment and river and coastal processes; • include the assessment of the remaining (known as 'residual') risk after risk reduction measures have been taken into account and demonstrate that these risks can be safely managed, ensuring people will not be exposed to hazardous flooding; • consider how the ability of water to soak into the ground may change with development, along with how the proposed layout of the project may affect drainage systems. Information should include: ○ 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	

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

	• be supported by appropriate data and information, including historical information on previous events.	development's lifetime without increasing flood risk elsewhere; • identify and secure opportunities to reduce the causes and impacts of flooding overall during the period of construction; and • be supported by appropriate data and information, including historical information on previous events.	
	5.8.16 Further guidance can be found in the Planning Practice Guidance Flood Risk and Coastal Change section which accompanies the NPPF, TAN15 for Wales or successor documents.	5.8.16 Further guidance can be found in the Planning Practice Guidance Flood Risk and Coastal Change section which accompanies the NPPF, TAN15 for Wales or successor documents.	**ES Chapter 12: Water Resources [APP/6.2]** considers relevant sections of the Planning Practice Guidance, the NPPF, and the government's associated planning guidance on water.
	5.8.17 Development (including construction works) will need to account for any existing watercourses and flood and coastal erosion risk management structures or features, or any land likely to be needed for future structures or features so as to ensure: • Access, clearances and sufficient land are retained to enable their maintenance, repair, operation, and replacement, as necessary • Their standard of protection is not reduced • Their condition or structural integrity is not reduced	5.8.17 Development (including construction works) will need to account for any existing watercourses and flood and coastal erosion risk management structures or features, or any land likely to be needed for future structures or features so as to ensure: • Access, clearances and sufficient land are retained to enable their maintenance, repair, operation, and replacement, as necessary • Their standard of protection is not reduced • Their condition or structural integrity is not reduced	**ES Chapter 12: Water Resources [APP/6.2]** describes the existing levels and assesses the anticipated water effects of the Scheme's construction, operational, and decommissioning in accordance with this policy. **ES Chapter 12: Water Resources [APP/6.2]** assess the impacts of the Scheme on water quality, water bodies or protected areas, and concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse water effects expected across the Scheme's construction, operational and decommissioning phases on water quality, water bodies or protected areas. The **Design Approach Document [APP/5.7]** sets out Project Principles which have influenced the design evolution to avoid and minimise effects on existing watercourses/drainage ditches, including Project Principle 3.3 to Reduce the impact of water runoff on the Nar Valley.
	5.8.18 Applicants for projects which may be affected by, or may add to, flood risk should arrange pre-application discussions before the official pre-application stage of the NSIP process with the EA or NRW, and, where relevant, other bodies such as Lead Local Flood Authorities, Internal Drainage Boards, sewerage undertakers, navigation authorities, highways authorities and reservoir owners and operators.	5.8.18 Applicants for projects which may be affected by, or may add to, flood risk should arrange pre-application discussions before the official pre-application stage of the NSIP process with the EA or NRW, and, where relevant, other bodies such as Lead Local Flood Authorities, Internal Drainage Boards, sewerage undertakers, navigation authorities, highways authorities and reservoir owners and operators.	Section 12.2 of **Chapter 12: Water Resources [APP/6.2]** sets out that the Applicant has been in consultation with Anglia Water, the Environment Agency, the Borough Council of King's Lynn & West Norfolk, and Breckland Council (the Lead Local Flood Authority) in relation to water resources. The Applicant has considered the advice and taken account of the feedback received through consultation. The pre-application consultation undertaken by the Applicant, and how feedback from consultees has informed the Scheme, is reported in the **Consultation Report [APP/5.1]** and its **Consultation Report Appendices [APP/5.2].**
	5.8.19 Such discussions should identify the likelihood and possible extent and nature of the flood risk, help scope the FRA, and identify the information that will be required by the Secretary of State to reach a decision on the application when it is submitted. The Secretary of State should advise applicants to undertake these	5.8.19 Such discussions should identify the likelihood and possible extent and nature of the flood risk, help scope the FRA, and identify the information that will be required by the Secretary of State to reach a decision on the application when it is submitted. The Secretary of State should advise applicants to undertake these steps	

	steps where they appear necessary but have not yet been addressed.	where they appear necessary but have not yet been addressed.	
	5.8.20 If the EA, NRW or another flood risk management authority has reasonable concerns about the proposal on flood risk grounds, the applicant should discuss these concerns with the EA or NRW and take all reasonable steps to agree ways in which the proposal might be amended, or additional information provided, which would satisfy the authority's concerns.	5.8.20 If the EA, NRW or another flood risk management authority has reasonable concerns about the proposal on flood risk grounds, the applicant should discuss these concerns with the EA or NRW and take all reasonable steps to agree ways in which the proposal might be amended, or additional information provided, which would satisfy the authority's concerns.	
	5.8.21 The Sequential Test ensures that a sequential, risk-based approach is followed to steer new development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account. Where it is not possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites with medium risk areas and then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas.	5.8.21 The Sequential Test ensures that a sequential, risk-based approach is followed to steer new development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account. Where it is not possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites with medium risk areas and then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas.	**ES Chapter 12: Water Resources [APP/6.2]** confirms that the entirety of the built aspects of the Scheme (Works No. 1-10) is situated in Flood Zone 1; only a small area of the Skylark Mitigation Works No. 11 (approximately 1.1 ha) is within the Flood Zone 2 and 3, which will continue to be used for agricultural activities; therefore, the Sequential Test is not triggered.
	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 the Sequential Test, informed by a strategic flood risk assessment, applicants need not apply the Sequential Test, provided the proposed development is consistent with the use for which the site was allocated and there is no new flood risk information that would have affected the outcome of the test.	5.8.22 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 the Sequential Test, informed by a strategic flood risk assessment, applicants need not apply the Sequential Test, provided the proposed development is consistent with the use for which the site was allocated and there is no new flood risk information that would have affected the outcome of the test.	
	5.8.23 Consideration of alternative sites should take account of the policy on alternatives set out in Section 4.3 above. All projects should apply the Sequential Test to locating development within the site.	5.8.23 Consideration of alternative sites should take account of the policy on alternatives set out in Section 4.3 above. All projects should apply the Sequential Test to locating development within the site.	
Mitigation	5.8.24 To satisfactorily manage flood risk, arrangements are required to manage surface water and the impact of the natural water cycle on people and property.	5.8.24 To satisfactorily manage flood risk, arrangements are required to manage surface water and the impact of the natural water cycle on people and property.	**ES Chapter 12: Water Resources [APP/6.2]** assess the impacts of the Scheme on water quality, water bodies or protected areas, and concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse water effects expected across the Scheme's construction, operational and decommissioning phases on water quality, water bodies or protected areas.

			The non-significant residual effects outlined in the assessment rely on controls established within the **oCEMP [APP/7.6], oOEMP [APP/7.8],** the **FRA [APP/6.4]** and the **oDS [APP/7.10].** These outline management plans and the Surface Water Drainage Strategy, which is embedded in the **FRA [APP/6.4]** set out the water-related measures to manage any potential water effects that may arise from the Scheme's construction, operational and decommissioning phases.
	5.8.25 In this NPS, the term SuDS refers to the whole range of sustainable approaches to surface water drainage management including, where appropriate: • source control measures including rainwater recycling and drainage • infiltration devices to allow water to soak into the ground, that can include individual soakaways and communal facilities • filter strips and swales, which are vegetated features that hold and drain water downhill mimicking natural drainage patterns • filter drains and porous pavements to allow rainwater and run-off to infiltrate into permeable material below ground and provide storage if needed • basins, ponds and tanks to hold excess water after rain and allow controlled discharge that avoids flooding • flood routes to carry and direct excess water through developments to minimise the impact of severe rainfall flooding	5.8.25 In this NPS, the term SuDS refers to the whole range of sustainable approaches to surface water drainage management including, where appropriate: • source control measures including rainwater recycling and drainage • infiltration devices to allow water to soak into the ground, that can include individual soakaways and communal facilities • filter strips and swales, which are vegetated features that hold and drain water downhill mimicking natural drainage patterns • filter drains and porous pavements to allow rainwater and run-off to infiltrate into permeable material below ground and provide storage if needed • basins, ponds and tanks to hold excess water after rain and allow controlled discharge that avoids flooding • flood routes to carry and direct excess water through developments to minimise the impact of severe rainfall flooding	As outlined in the **FRA [APP/6.4]**, surface water runoff from the Solar PV will be managed through Rural SuDS and Natural Flood Management techniques, such as grassland/wildflower areas, which will act to bind soils, slow surface water, and improve water quality compared to the baseline scenario. The **FRA [APP/6.4]** includes a Surface Water Drainage Strategy, which outlines how surface water runoff from the Site will be managed in accordance with national, regional, and local requirements regarding flood risk and drainage. As the Scheme does not have a detailed layout, a detailed drainage strategy cannot be provided at this stage, although the principles and design criteria presented in this document are applicable. These criteria will be applied during the detailed design phase, and the detailed SuDS will be secured in the DCO through a Requirement of the **draft DCO [APP/3.1].** The **Design Approach Document [APP/5.7]** includes the adoption of project level design principles (Project Principles) to guide decision making and embed good design outcomes in the Scheme. Principle 4.3 ensures the Scheme is resilient to flooding and does not increase flooding elsewhere.
	5.8.26 Site layout and surface water drainage systems should cope with events that exceed the design capacity of the system, so that excess water can be safely stored on or conveyed from the site without adverse impacts.	5.8.26 Site layout and surface water drainage systems should cope with events that exceed the design capacity of the system, so that excess water can be safely stored on or conveyed from the site without adverse impacts.	The DCO Application is supported by **ES Appendix 12.2: FRA [APP/6.4],** which considers the impacts of the Scheme on drainage. As outlined in the **ES Appendix 12.2: FRA [APP/6.4]**, surface water runoff from the Solar PV will be managed through Rural SuDS and Natural Flood Management techniques, such as grassland/wildflower areas, which will act to bind soils, slow surface water, and improve water quality compared to the baseline scenario. The **ES Appendix 12.2: FRA [APP/6.4]** includes a Surface Water Drainage Strategy, which outlines how surface water runoff from the Site will be managed in accordance with national, regional, and local requirements regarding flood risk and drainage. As the Scheme does not have a detailed layout, a detailed drainage strategy cannot be provided at this stage. However, the principles and design criteria presented in this document are applicable. These criteria will be applied during the detailed design phase, and the detailed SuDS will be secured in the DCO through a requirement of the **draft DCO [APP/3.1].**
	5.8.27 The surface water drainage arrangements for any project should, accounting for the predicted impacts of climate change throughout the development's lifetime, be such that the volumes and peak flow rates of surface water leaving the site are no greater than the rates prior to the proposed project, unless specific off-site arrangements are made and result in the same net effect.	5.8.27 The surface water drainage arrangements for any project should, accounting for the predicted impacts of climate change throughout the development's lifetime, be such that the volumes and peak flow rates of surface water leaving the site are no greater than the rates prior to the proposed project, unless specific off-site arrangements are made and result in the same net effect.	

	5.8.28 It may be necessary to provide surface water storage and infiltration to limit and reduce both the peak rate of discharge from the site and the total volume discharged from the site. There may be circumstances where it is appropriate for infiltration facilities or attenuation storage to be provided outside the project site, if necessary through the use of a planning obligation.	5.8.28 It may be necessary to provide surface water storage and infiltration to limit and reduce both the peak rate of discharge from the site and the total volume discharged from the site. There may be circumstances where it is appropriate for infiltration facilities or attenuation storage to be provided outside the project site, if necessary through the use of a planning obligation.	
	5.8.29 The sequential approach should be applied to the layout and design of the project. Vulnerable aspects of the development should be located on parts of the site at lower risk and residual risk of flooding. Applicants should seek opportunities to use open space for multiple purposes such as amenity, wildlife.	5.8.29 The sequential approach should be applied to the layout and design of the project. Vulnerable aspects of the development should be located on parts of the site at lower risk and residual risk of flooding. Applicants should seek opportunities to use open space for multiple purposes such as amenity, wildlife.	**ES Chapter 12: Water Resources [APP/6.2]** confirms that the entirety of the built aspects of the Scheme (Works No. 1-10) is situated in Flood Zone 1; only a small area of the Skylark Mitigation Works No. 11 (approximately 1.1 ha) is within the Flood Zone 2 and 3, which will continue to be used for agricultural activities; therefore, the Sequential Test is not triggered.
	5.8.30 Where a development may result in an increase in flood risk elsewhere through the loss of flood storage, on-site level-for-level compensatory storage, accounting for the predicted impacts of climate change over the lifetime of the development, should be provided.	5.8.30 Where a development may result in an increase in flood risk elsewhere through the loss of flood storage, on-site level-for-level compensatory storage, accounting for the predicted impacts of climate change over the lifetime of the development, should be provided.	The **Design Approach Document [APP/5.7]** includes the adoption of project level design principles (Project Principles) to guide decision making and embed good design outcomes in the Scheme. Principle 4.3 ensures the Scheme is resilient to flooding and does not increase flooding elsewhere. The DCO Application is supported by **ES Appendix 12.2: FRA [APP/6.4],** which considers the impacts of the Scheme on drainage.
	5.8.31 Where it is not possible to provide compensatory storage on site, it may be acceptable to provide it off-site if it is hydraulically and hydrologically linked. Where development may cause the deflection or constriction of flood flow routes, these will need to be safely managed within the site.	5.8.31 Where it is not possible to provide compensatory storage on site, it may be acceptable to provide it off-site if it is hydraulically and hydrologically linked. Where development may cause the deflection or constriction of flood flow routes, these will need to be safely managed within the site.	As outlined in the **ES Appendix 12.2: FRA [APP/6.4]**, surface water runoff from the Solar PV will be managed through Rural SuDS and Natural Flood Management techniques, such as grassland/wildflower areas, which will act to bind soils, slow surface water, and improve water quality compared to the baseline scenario. The **ES Appendix 12.2: FRA [APP/6.4]** includes a Surface Water Drainage Strategy, which sets out how surface water runoff from the Site will be managed in line with the national, regional and local requirements regarding flood risk and drainage. As the Scheme does not have a detailed layout, a detailed drainage strategy cannot be provided at this stage, with the principles and design criteria presented in this document. These criteria will be applied during the detailed design phase, and the detailed SuDS will be secured in the DCO through a requirement of the **draft DCO [APP/3.1].** Section 12.1 of **ES Appendix 12.2: FRA [APP/6.4]** sets out that the hydraulic modelling undertaken upstream of the River Nar as far as Marham concluded that even with a major tidal event on the Great Ouse and a back up behind the Nar's tidal outfall structure, water levels would not be affected as far upstream as Marham.
	5.8.32 Where development may contribute to a cumulative increase in flood risk elsewhere, the provision of multifunctional sustainable drainage systems, natural flood management and green infrastructure can also make a valuable	5.8.32 Where development may contribute to a cumulative increase in flood risk elsewhere, the provision of multifunctional sustainable drainage systems, natural flood management and green infrastructure can also make a valuable contribution to	As concluded in the **FRA [APP/6.4],** it is not considered that the Scheme would contribute to a cumulative increase in flood risk elsewhere.

	contribution to mitigating this risk whilst providing wider benefits.	mitigating this risk whilst providing wider benefits.	
	5.8.33 The receipt of and response to warnings of floods is an essential element in the management of the residual risk of flooding. Flood Warning and evacuation plans should be in place for those areas at an identified risk of flooding.	5.8.33 The receipt of and response to warnings of floods is an essential element in the management of the residual risk of flooding. Flood Warning and evacuation plans should be in place for those areas at an identified risk of flooding.	As outlined in the **oCEMP [APP/7.6]**, **oOEMP [APP/7.8]**, and the **oDS [APP/7.10]**, there is a requirement to monitor weather forecasts and news for Environment Agency flood warnings, relevant weather warnings, and water levels of local waterways.
	5.8.34 The applicant should take advice from the local authority emergency planning team, emergency services and, where appropriate, from the local resilience forum when producing an evacuation plan for a manned energy project as part of the FRA. Any emergency planning documents, flood warning and evacuation procedures that are required should be identified in the FRA.	5.8.34 The applicant should take advice from the local authority emergency planning team, emergency services and, where appropriate, from the local resilience forum when producing an evacuation plan for a manned energy project as part of the FRA. Any emergency planning documents, flood warning and evacuation procedures that are required should be identified in the FRA.	
	5.8.35 Flood resistant and resilient materials and design should be adopted to minimise damage and speed recovery in the event of a flood.	5.8.35 Flood resistant and resilient materials and design should be adopted to minimise damage and speed recovery in the event of a flood.	The Scheme has been designed to safeguard the water environment and the provisioning of resiliency measures to flooding (now and in the future), as set out in the **Design Approach Document [APP/5.7].**
Secretary of State decision making	5.8.36 In determining an application for development consent, the Secretary of State should be satisfied that where relevant: • the application is supported by an appropriate FRA • the Sequential Test has been applied and satisfied as part of site selection • a sequential approach has been applied at the site level to minimise risk by directing the most vulnerable uses to areas of lowest flood risk • the proposal is in line with any relevant national and local flood risk management strategy • SuDS (as required in the next paragraph on National Standards) have been used unless there is clear evidence that their use would be inappropriate • in flood risk areas the project is designed and constructed to remain safe and operational during its lifetime, without increasing flood risk elsewhere (subject to the exceptions set out in paragraph 5.8.42) • the project includes safe access and escape routes where required, as part of an agreed	5.8.36 In determining an application for development consent, the Secretary of State should be satisfied that where relevant: • the application is supported by an appropriate FRA • the Sequential Test has been applied and satisfied as part of site selection (subject to the exception set out in 5.8.22, and any technology specific exceptions set out in other NPSs) • a sequential approach has been applied at the site level to minimise risk by directing the most vulnerable uses to areas of lowest flood risk • the proposal is in line with any relevant national and local flood risk management strategy • SuDS (as required in the next paragraph on National Standards) have been used unless there is clear evidence that their use would be inappropriate • in flood risk areas the project is designed and constructed to remain safe and operational during its lifetime, without	The DCO Application is supported by **ES Appendix 12.2: FRA [APP/6.4].** **ES Chapter 12: Water Resources [APP/6.2]** confirms that the entirety of the built aspects of the Scheme (Works No. 1-10) is situated in Flood Zone 1; only a small area of the Skylark Mitigation Works No. 11 (approximately 1.1 ha) is within the Flood Zone 2 and 3, which will continue to be used for agricultural activities; therefore, the Sequential Test is not triggered. The Scheme's compliance with the national and local flood risk policies is considered in this **Policy Compliance Document [APP/5.6].** As set out in the **FRA [APP/6.4],** surface water runoff from the Solar PV will be managed through Rural SuDS and Natural Flood Management techniques such as grassland/wildflower, which will act to bind soils, slow surface water, and increase water quality compared to the baseline scenario. The **FRA [APP/6.4]** includes a Surface Water Drainage Strategy, which sets out how surface water runoff from the Site will be managed in line with the national, regional and local requirements regarding flood risk and drainage. As the Scheme does not have a detailed layout, a detailed drainage strategy cannot be provided at this stage, with the principles and design criteria presented in this document. These criteria will be applied at the detailed design phase and the detailed SuDS is secured in the DCO through a requirement of the **draft DCO [APP/3.1].** As concluded in the **FRA [APP/6.4],** it is not considered that the Scheme would contribute to an increase in flood risk elsewhere.

	emergency plan, and that any residual risk can be safely managed over the lifetime of the development • land that is likely to be needed for present or future flood risk management infrastructure has been appropriately safeguarded from development to the extent that development would not prevent or hinder its construction, operation or maintenance	increasing flood risk elsewhere (subject to the exceptions set out in paragraph 5.8.42) • the project includes safe access and escape routes where required, as part of an agreed emergency plan, and that any residual risk can be safely managed over the lifetime of the development • land that is likely to be needed for present or future flood risk management infrastructure has been appropriately safeguarded from development to the extent that development would not prevent or hinder its construction, operation or maintenance	
	5.8.37 For energy projects which have drainage implications, approval for the project's drainage system, including during the construction period, will form part of the development consent issued by the Secretary of State. The Secretary of State will therefore need to be satisfied that the proposed drainage system complies with any National Standards published by Ministers under paragraph 5(1) of Schedule 3 to the Flood and Water Management Act 2010.	5.8.37 For energy projects which have drainage implications, approval for the project's drainage system, including during the construction period, will form part of the development consent issued by the Secretary of State. The Secretary of State will therefore need to be satisfied that the proposed drainage system complies with any National Standards published by Ministers under paragraph 5(1) of Schedule 3 to the Flood and Water Management Act 2010.	The **FRA [APP/6.4]** includes a Surface Water Drainage Strategy, which sets out how surface water runoff from the Site will be managed in line with the national, regional and local requirements regarding flood risk and drainage. As the Scheme does not have a detailed layout, a detailed drainage strategy cannot be provided at this stage, with the principles and design criteria presented in this document. These criteria will be applied at the detailed design phase and the detailed SuDS is secured in the DCO through a requirement of the **draft DCO [APP/3.1].** **ES Chapter 12: Water Resources [APP/6.2]** has considered the Flood and Water Management Act 2010 in its assessment of the Scheme.
	5.8.38 In addition, the Development Consent Order, or any associated planning obligations, will need to make provision for appropriate operation and maintenance of any SuDS throughout the project's lifetime. Where this is secured through the adoption of any SuDS features, any necessary access rights to property will need to be granted.	5.8.38 In addition, the Development Consent Order, or any associated planning obligations, will need to make provision for appropriate operation and maintenance of any SuDS throughout the project's lifetime. Where this is secured through the adoption of any SuDS features, any necessary access rights to property will need to be granted.	The **FRA [APP/6.4]** includes a Surface Water Drainage Strategy (which will form part of a detailed CEMP(s)) will include details of pre-construction, construction, and post-construction water quality monitoring, its recommendations include that all SuDS features are to be designed in accordance with the CIRIA C753 SuDS Manual, to ensure that surface water runoff discharged from the Site will be of an acceptable standard by following best design practices.
	5.8.39 Where relevant, the Secretary of State should be satisfied that the most appropriate body is being given the responsibility for maintaining any SuDS, taking into account the nature and security of the infrastructure on the proposed site. Responsible bodies could include, for example the landowner, the relevant lead local flood authority or water and sewerage company (through the Ofwat approved Sewerage Sector Guidance), or another body, such as an Internal Drainage Board.	5.8.39 Where relevant, the Secretary of State should be satisfied that the most appropriate body is being given the responsibility for maintaining any SuDS, taking into account the nature and security of the infrastructure on the proposed site. Responsible bodies could include, for example the landowner, the relevant lead local flood authority or water and sewerage company (through the Ofwat approved Sewerage Sector Guidance), or another body, such as an Internal Drainage Board.	The Applicant considers that there are no flood risk-related grounds that may trigger this clause. Section 12.2 of **ES Chapter 12: Water Resources [APP/6.2]** sets out that the Applicant has been in consultation Anglia Water, the Environment Agency, the Borough Council of King's Lynn & West Norfolk, and Breckland Council (the Lead Local Flood Authority) in relation to water resources. The Applicant has considered the advice and taken account of the feedback received through consultation. The pre-application consultation undertaken by the Applicant and how feedback from consultees has informed the Scheme is reported within the **Consultation Report [APP/5.1]** and its **Consultation Report Appendices [APP/5.2]**

	5.8.40 If the EA, NRW or another flood risk management authority continues to have concerns and objects to the grant of development consent on the grounds of flood risk, the Secretary of State can grant consent, but would need to be satisfied before deciding whether or not to do so that all reasonable steps have been taken by the applicant and the authority to try to resolve the concerns.	5.8.40 If the EA, NRW or another flood risk management authority continues to have concerns and objects to the granting of development consent on the grounds of flood risk, the Secretary of State can grant consent, but would need to be satisfied before deciding whether or not to do so that all reasonable steps have been taken by the applicant and the authority to try to resolve the concerns.	**ES Chapter 12: Water Resources [APP/6.2]** confirms that the entirety of the built aspects of the Scheme (Works No. 1-10) is situated in Flood Zone 1; only a small area of the Skylark Mitigation Works No. 11 (approximately 1.1 ha) is within the Flood Zone 2 and 3, which will continue to be used for agricultural activities; therefore, the Sequential Test is not triggered.
	5.8.41 Energy projects should not normally be consented within Flood Zone 3b, or Zone C2 in Wales, or on land expected to fall within these zones within its predicted lifetime. This may also apply where land is subject to other sources of flooding (for example surface water). However, where essential energy infrastructure has to be located in such areas, for operational reasons, they should only be consented if the development will not result in a net loss of floodplain storage, and will not impede water flows.	5.8.41 Energy projects should not normally be consented within Flood Zone 3b, or Zone C2 in Wales, or on land expected to fall within these zones within its predicted lifetime. This may also apply where land is subject to other sources of flooding (for example surface water). However, where essential energy infrastructure has to be located in such areas, for operational reasons, they should only be consented if the development will not result in a net loss of floodplain storage, and will not impede water flows.	
	5.8.42 Exceptionally, where an increase in flood risk elsewhere cannot be avoided or wholly mitigated, the Secretary of State may grant consent if they are satisfied that the increase in present and future flood risk can be mitigated to an acceptable and safe level and taking account of the benefits of, including the need for, nationally significant energy infrastructure as set out in Part 3 above. In any such case the Secretary of State should make clear how, in reaching their decision, they have weighed up the increased flood risk against the benefits of the project, taking account of the nature and degree of the risk, the future impacts on climate change, and advice provided by the EA or NRW and other relevant bodies.	5.8.42 Exceptionally, where an increase in flood risk elsewhere cannot be avoided or wholly mitigated, the Secretary of State may grant consent if they are satisfied that the increase in present and future flood risk can be mitigated to an acceptable and safe level and taking account of the benefits of, including the need for, nationally significant energy infrastructure as set out in Part 3 above. In any such case the Secretary of State should make clear how, in reaching their decision, they have weighed up the increased flood risk against the benefits of the project, taking account of the nature and degree of the risk, the future impacts on climate change, and advice provided by the EA or NRW and other relevant bodies.	
Part 5.9 - Historic Environment ***Applicant Assessment***	5.9.9 The applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA, and describe these along with how the mitigation hierarchy has been applied in the ES (see Section 4.3). This should include consideration of heritage assets above, at, and below the surface of the ground. Consideration will also need to be given to the possible impacts, including cumulative, on the wider	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	**ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** provides an assessment of the Scheme's impact on the historic environment, both above and below ground assets, within the Order limits, or that will be impacted by the Scheme. The Chapter describes the heritage assets within the Study Area for the Scheme and their significance, and the significance of their contribution to the setting. Section 8.6 references the historic landscape of the Bracks National Character Area, which is not impacted by the development. The chapter concludes that there are no significant residual effects identified during the construction, operation, and decommissioning of the Scheme.

	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.	cumulative, on the wider historic environment. The assessment should include reference to any historic landscape or seascape character assessment and associated studies as a means of assessing impacts relevant to the proposed project.	**ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** has been informed by the Historic Environment Record (HER).
	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.	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 heritage assets themselves using expertise where necessary according to the proposed development's impact.	
	5.9.11 Where a site on which development is proposed includes, or the available evidence suggests it has the potential to include, heritage assets with an archaeological interest, the applicant should carry out appropriate desk-based assessment and, where such desk-based research is insufficient to properly assess the interest, a field evaluation. Where proposed development will affect the setting of a heritage asset, accurate representative visualisations may be necessary to explain the impact.	5.9.13 Where a site on which development is proposed includes, or the available evidence suggests it has the potential to include, heritage assets with an archaeological interest, the applicant should carry out appropriate desk-based assessment and, where such desk-based research is insufficient to properly assess the interest, a field evaluation. Where proposed development will affect the setting of a heritage asset, accurate representative visualisations may be necessary to explain the impact	Section 8.5 of **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** sets out the existing cultural heritage baseline conditions. The full details of the baseline conditions are presented in the following appendices presented in **ES Volume 4 [APP/6.4]:** • **Appendix 8.1: Consultation and Legislation, Planning Policy and Guidance** • **Appendix 8.2: Stage 1 and Stage 2 Setting Assessment** • **Appendix 8.3: Archaeological Desk-Based Assessment** • **Appendix 8.4: Geophysical Survey Report** • **Appendix 8.5: Air Photo Services Report** • **Appendix 8.6: Archaeological Trial Trenching Report** • **Appendix 8.7: outline Archaeological Mitigation Strategy** The chapter concludes that there are no significant residual effects identified during the construction, operation, and decommissioning of the Scheme.
	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	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	**ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** provides an assessment of the Scheme impact on the historic environment, both above and below ground assets, within the Order limits, or that will be impacted by the Scheme. The chapter concludes that there are no significant residual effects identified during the construction, operation, and decommissioning of the Scheme.

	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.	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.	The assessment of the heritage impact of noise (including construction and decommissioning phase noise) has been based on assumptions set out in **ES Chapter 10: Noise and Vibration [APP/6.2].**
	5.9.13 The applicant is encouraged, where opportunities exist, to prepare proposals which can make a positive contribution to the historic environment, and to consider how their scheme takes account of the significance of heritage assets affected. This can include, where possible: • enhancing, through a range of measures such a sensitive design, the significance of heritage assets or setting affected • considering where required the development of archive capacity which could deliver significant public benefits • 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	5.9.15 The applicant is encouraged, where opportunities exist, to prepare proposals which can make a positive contribution to the historic environment, and to consider how their scheme takes account of the significance of heritage assets affected. This can include, where possible: • enhancing, through a range of measures such a sensitive design, the significance of heritage assets or setting affected • considering where required the development of archive capacity which could deliver significant public benefits • 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 8.7 of **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** sets out the embedded mitigation proposed in relation to historic environment, both above and below ground assets. Section 8.9 of **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** sets out the additional mitigation measures proposed in relation to historic environment, both above and below ground assets. **ES Appendix 8.6: Archaeological Trial Trenching Report [APP/6.4]** have been produced in support of this DCO Application. A detailed Archaeological Mitigation Strategy is to be drafted in accordance with the **ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4]**, and submitted to and approved by BC and is secured via a requirement of the **draft DCO [APP/3.1].** Section 8.8 of **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** sets out that if the Scheme were not to proceed, the archaeological remains within the Site would continue to deteriorate as a result of truncation from ploughing.
	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.	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.	**ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** provides an assessment of the Scheme's impact on the historic environment, both above and below ground assets, within the Order limits, or that will be impacted by the Scheme. The Chapter describes the heritage assets within the Study Area for the Scheme and their significance, and the significance of their contribution to the setting. **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse heritage related effects expected across the Scheme's construction, operational and decommissioning phases. The embedded and additional mitigation measures are documented within the: **oCEMP [APP/7.6], oCTMP [APP/7.7], oOEMP [APP/7.8], oDS [APP/7.10],** and **oLEMP [APP/7.11]** and are secured via requirements of the **draft DCO [APP/3.1].** Effects arising during the construction stage will be temporary, limited to the construction period only and reversible. Decommissioning is anticipated to commence 60 years after final commissioning. The effects to all identified heritage assets during the decommissioning phase are likely to be similar to construction effects, including being temporary and reversible.
	5.9.15 Applicants should look for opportunities for new development within Conservation Areas	5.9.17 Applicants should look for opportunities for new development within	There are no World Heritage Sites affected by the Scheme.

	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.	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.	**ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** identifies changes to the setting of Castle Acre Conservation Area and South Acre Conservation Area as being relevant cultural heritage receptors across the Scheme's construction, operational and decommissioning phases. The assessment concludes that with additional mitigation in place, there are no significant adverse impacts anticipated on changes to the setting of Castle Acre Conservation Area and South Acre Conservation Area.
Mitigation	5.9.16 A documentary record of our past is not as valuable as retaining the heritage asset, and therefore the ability to record evidence of the asset should not be a factor in deciding whether such loss should be permitted, and whether or not consent should be given.	5.9.18 A documentary record of our past is not as valuable as retaining the heritage asset, and therefore the ability to record evidence of the asset should not be a factor in deciding whether such loss should be permitted, and whether or not consent should be given.	**ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** provides an assessment of the Scheme's impact on the historic environment, both above and below ground assets, within the Order limits, or that will be impacted by the Scheme. The Chapter describes the heritage assets within the Study Area for the Scheme and their significance, and the significance of their contribution to the setting. **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse heritage related effects expected across the Scheme's construction, operational and decommissioning phases. The embedded and additional mitigation measures are documented within the: **oCEMP [APP/7.6], oCTMP [APP/7.7], oOEMP [APP/7.8], oDS [APP/7.10],** and **oLEMP [APP/7.11]** and are secured via requirements of the **draft DCO [APP/3.1].** Effects arising during the construction stage will be temporary, limited to the construction period only and reversible. Decommissioning is anticipated to commence 60 years after final commissioning. The effects to all identified heritage assets during the decommissioning phase are likely to be similar to construction effects, including being temporary and reversible.
	5.9.17 Where the loss of the whole or part of a heritage asset's significance is justified, the Secretary of State will require the applicant to record and advance understanding of the significance of the heritage asset before it is lost (wholly or in part). The extent of the requirement should be proportionate to the asset's importance and significance and the impact. The applicant should be required to publish this evidence and to deposit copies of the reports with the relevant Historic Environmental Record. They should also be required to deposit the archive generated in a local museum or other public repository willing to receive it.	5.9.19 Where the loss of the whole or part of a heritage asset's significance is justified, the Secretary of State will require the applicant to record and advance understanding of the significance of the heritage asset before it is lost (wholly or in part). The extent of the requirement should be proportionate to the asset's importance and significance and the impact. The applicant should be required to publish this evidence and to deposit copies of the reports with the relevant Historic Environmental Record. They should also be required to deposit the archive generated in a local museum or other public repository willing to receive it.	
	5.9.18 Where appropriate, the Secretary of State will impose requirements on the Development Consent Order to ensure that the work is undertaken in a timely manner, in accordance with a written scheme of investigation that complies with the policy in this NPS and which has been agreed in writing with the relevant local authority, and to ensure that the completion of the exercise is properly secured.	5.9.20 Where appropriate, the Secretary of State will impose requirements on the Development Consent Order to ensure that the work is undertaken in a timely manner, in accordance with a written scheme of investigation that complies with the policy in this NPS and which has been agreed in writing with the relevant local authority, and to ensure that the completion of the exercise is properly secured.	**ES Appendix 8.6: Archaeological Trial Trenching Report [APP/6.4]** have been produced in support of this DCO Application. A detailed Archaeological Mitigation Strategy is to be drafted in accordance with the **ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4]**, and submitted to and approved by BC and is secured via a requirement of the **draft DCO [APP/3.1].**
	5.9.19 Where the loss of significance of any heritage asset has been justified by the applicant on the merits of the new development and the significance of the asset in question, the Secretary of State should consider:	5.9.21 Where the loss of significance of any heritage asset has been justified by the applicant on the merits of the new development and the significance of the asset in question, the Secretary of State should consider:	**ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse heritage related effects expected across the Scheme's construction, operational and decommissioning phases. The embedded and additional mitigation measures are documented within the: **oCEMP [APP/7.6],**

	• imposing a requirement in the Development Consent Order • requiring the applicant to enter into an obligation	• imposing a requirement in the Development Consent Order • requiring the applicant to enter into an obligation that will prevent the loss occurring until the relevant part of the development has commenced, or it is reasonably certain that the relevant part of the development is to proceed.	**oCTMP [APP/7.7], oOEMP [APP/7.8], oDS [APP/7.10],** and **oLEMP [APP/7.11]** and are secured via requirements of the **draft DCO [APP/3.1].**
	5.9.20 That will prevent the loss occurring until the relevant part of the development has commenced, or it is reasonably certain that the relevant part of the development is to proceed.		
	5.9.21 Where there is a high probability (based on an adequate assessment) that a development site may include, as yet undiscovered heritage assets with archaeological interest, the Secretary of State will consider requirements to ensure appropriate procedures are in place for the identification and treatment of such assets discovered during construction.	5.9.22 Where there is a high probability (based on an adequate assessment) that a development site may include as yet undiscovered heritage assets with archaeological interest, the Secretary of State will consider requirements to ensure appropriate procedures are in place for the identification and treatment of such assets discovered during construction.	
Secretary of State decision making	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: • relevant information provided with the application and, where applicable, relevant information submitted during the examination of the application • any designation records, including those on the National Heritage List for England, or included on Cof Cymru for Wales. • historic landscape character records • the relevant Historic Environment Record(s), and similar sources of information • representations made by interested parties during the examination process	5.9.23 In determining applications, the Secretary of State should seek to identify and assess the particular significance of any heritage asset that may be affected by the proposed development, including by development affecting the setting of a heritage asset, taking account of: • relevant information provided with the application and, where applicable, relevant information submitted during the examination of the application • any designation records, including those on the National Heritage List for England, or included on Cof Cymru for Wales. • historic landscape character records • the relevant Historic Environment Record(s), and similar sources of information	**ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** sets out the criteria for assessing the importance of heritage assets within the study area. The importance of a heritage asset is the overall value assigned to it reflecting its statutory designation or, in the case of non-designated assets, the professional judgement of the assessor with reference to national and local guidance and the planning policy tests. Section 8.6 sets out various designations, historic landscape character records, relevant Historic Environment Records, and equivalent resources which are within or surrounding the Scheme, but this does not change the overall impact that there are no significant residual effects identified during the construction, operation, and decommissioning of the Scheme. Historic England guidance also refers to an asset's "level of significance" which in this usage has the same meaning as importance.

	• expert advice, where appropriate, and when the need to understand the significance of the heritage asset demands it	• representations made by interested parties during the examination process • expert advice, where appropriate, and when the need to understand the significance of the heritage asset demands it	
	5.9.23 The Secretary of State must also comply with the requirements on listed buildings, conservation areas and scheduled monuments, set out in Regulation 3 of the Infrastructure Planning (Decisions) Regulations 2010.	5.9.24 The Secretary of State must also comply with the requirements on listed buildings, conservation areas and scheduled monuments, set out in Regulation 3 of the Infrastructure Planning (Decisions) Regulations 2010.	**ES Appendix 8.6: Archaeological Trial Trenching Report [APP/6.4]** have been produced in support of this DCO Application. A detailed Archaeological Mitigation Strategy is to be drafted in accordance with the **ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4]**, and submitted to and approved by BC and is secured via a requirement of the **draft DCO [APP/3.1].** Section 8.8 of **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** sets out that if the Scheme were not to proceed, the archaeological remains within the Site would continue to deteriorate as a result of truncation from ploughing. **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** provides an assessment of the Scheme's impact on the historic environment, both above and below ground assets, within the Order limits, or that will be impacted by the Scheme. The Chapter describes the heritage assets within the Study Area for the Scheme and their significance, and the significance of their contribution to the setting. **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse heritage related effects expected across the Scheme's construction, operational and decommissioning phases. The embedded and additional mitigation measures are documented within the: **oCEMP [APP/7.6], oCTMP [APP/7.7], oOEMP [APP/7.8], oDS [APP/7.10],** and **oLEMP [APP/7.11]** and are secured via requirements of the **draft DCO [APP/3.1].** Section 8.7 of **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** sets out the embedded mitigation proposed in relation to historic environment, both above and below ground assets. Section 8.9 of **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** sets out the additional mitigation measures proposed in relation to historic environment, both above and below ground assets. The following embedded mitigation measures have been incorporated into the Scheme design for the construction phase, detailed within the **oCEMP [APP/7.6]:** • Where possible, transportation routes will avoid additional traffic movements past sensitive heritage assets • The landscape strategy will include the gapping up and reinforcing of historic hedgerows, as well as the use of planting to provide screening from heritage assets • The locations of temporary construction compounds have been selected to avoid areas of known archaeological remains and to be unobtrusive to the settings of the heritage assets
	5.9.24 In considering the impact of a proposed development on any heritage assets, the Secretary of State should consider the particular nature of the significance of the heritage assets and the value that they hold for this and future generations. This understanding should be used to avoid or minimise conflict between their conservation and any aspect of the proposal.	5.9.25 In considering the impact of a proposed development on any heritage assets, the Secretary of State should consider the particular nature of the significance of the heritage assets and the value that they hold for this and future generations. This understanding should be used to avoid or minimise conflict between their conservation and any aspect of the proposal.	
	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.	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.	
	5.9.26 The Secretary of State should also consider the desirability of the new development making a positive contribution to the character and local distinctiveness of the historic environment. The consideration of design should include scale, height, massing, alignment, materials, use and landscaping (for example, screen planting).	5.9.27 The Secretary of State should also consider the desirability of the new development making a positive contribution to the character and local distinctiveness of the historic environment. The consideration of design should include scale, height, massing, alignment, materials, use and landscaping (for example, screen planting).	
	5.9.27 When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset's conservation. The more important the asset, the	5.9.28 When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset's conservation. The more	

	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.	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 locations of permanent above-ground assets have been selected to reduce/remove impact on heritage assets from construction works to the north; and • There may also be the overgrounding of cable runs in areas known to contain significant archaeological remains. The following embedded mitigation measures have been incorporated into the Scheme design for the operational phase, as set out in the **oOEMP [APP/7.8]:** • The landscape strategy will include the gapping up and reinforcing of historic hedgerows, as well as the use of planting to provide screening from heritage assets; and • The locations of permanent above-ground assets have been selected to reduce/remove impact on heritage assets from construction works to the north. The following embedded mitigation measures have been incorporated into the Scheme design for the decommissioning phase, as set out in the **oDS [APP/7.10]:** • No vehicle or plant movements that could impact the archaeological horizon will take place in areas with archaeological assets; and • A Decommissioning Strategy will be agreed with the relevant Archaeological Advisor prior to decommissioning taking place; this will include further measures for safeguarding archaeological remains during the decommissioning phase.
	5.9.28 The Secretary of State should give considerable importance and weight to the desirability of preserving all heritage assets. Any harm or loss of significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification.	5.9.29 The Secretary of State should give considerable importance and weight to the desirability of preserving all heritage assets. Any harm or loss of significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification.	
	5.9.29 Substantial harm to or loss of significance of a grade II Listed Building or a grade II Registered Park or Garden should be exceptional.	5.9.30 Substantial harm to or loss of significance of a grade II Listed Building or a grade II Registered Park or Garden should be exceptional.	Section 8.6 of **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** outlines the baseline conditions of heritage assets. The section sets out the fifteen designated and other non-designated heritage assets that have been scoped in as receptors/matters for assessment. With the derivation of a heritage asset's significance in mind. The receptors/matters assessed include: changes to the setting of Listed Buildings, Conservation Areas, Scheduled Monuments, a Registered Park and Garden, The Brecks National Character Area and non-designated heritage buildings, direct physical impacts to designated heritage assets; changes to the setting of non-designated heritage assets and direct physical impacts to non-designated heritage assets. **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** outlines that 'substantial harm' is afforded to any adverse effect that is of a major magnitude whilst moderate, minor or negligible adverse effects represent effects that are of 'less than substantial harm' in nature. Given**, ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse effects, it constitutes 'less than substantial harm'. The substantial benefits of the Scheme are set out in the Section 5.3 of the **Planning Statement [APP/5.5]**. In addition, NPS EN-1 establishes a CNP for the provision of nationally significant low carbon infrastructure, which includes large-scale solar farms. As set out in NPS EN-1 paragraph 4.2.16, CNP infrastructure should be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances.
	5.9.30 Substantial harm to or loss of significance of assets of the highest significance, including Scheduled Monuments; Protected Wreck Sites; Registered Battlefields; grade I and II* Listed Buildings; grade I and II* Registered Parks and Gardens; and World Heritage Sites, should be wholly exceptional.	5.9.31 Substantial harm to or loss of significance of assets of the highest significance, including Scheduled Monuments; Protected Wreck Sites; Registered Battlefields; grade I and II* Listed Buildings; grade I and II* Registered Parks and Gardens; and World Heritage Sites, should be wholly exceptional.	
	5.9.31 Where the proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset the Secretary of State should refuse consent unless it can be demonstrated that the substantial harm to, or loss of, significance is necessary to achieve substantial public benefits that outweigh that harm or loss, or all the following apply: • the nature of the heritage asset prevents all reasonable uses of the site • no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation	5.9.32 Where the proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset the Secretary of State should refuse consent unless it can be demonstrated that the substantial harm to, or loss of, significance is necessary to achieve substantial public benefits that outweigh that harm or loss, or all the following apply: • the nature of the heritage asset prevents all reasonable uses of the site • no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation	

	• conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible • the harm or loss is outweighed by the benefit of bringing the site back into use	• 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	
	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.	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.	
	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.	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.	**ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** concludes that there are no significant adverse effects anticipated on non-designated heritage assets.
	5.9.34 Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 5.9.30 or less than substantial harm under paragraph 5.9.32, as appropriate, considering the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.	5.9.35 Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 5.9.30 or less than substantial harm under paragraph 5.9.31, as appropriate, considering the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.	There are no World Heritage Sites affected by the Scheme. **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** identifies changes to the setting of Castle Acre Conservation Area and South Acre Conservation Area as being relevant cultural heritage receptors across the Scheme's construction, operational and decommissioning phases. The assessment concludes that with additional mitigation in place, there are no significant adverse impacts anticipated on changes to the setting of Castle Acre Conservation Area and South Acre Conservation Area.
	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 state into account in any decision.	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.
	5.9.36 When considering applications for development affecting the setting of a designated heritage asset, the Secretary of State should give appropriate weight to the desirability of preserving the setting such assets and treat favourably applications that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of, the asset. When considering applications that do not do this, the Secretary of	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,	**ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** provides an assessment of the Scheme's impact on the historic environment, both above and below ground assets, within the Order limits, or that will be impacted by the Scheme. The Chapter describes the heritage assets within the Study Area for the Scheme and their significance, and the significance of their contribution to the setting. **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse heritage related effects expected across the Scheme's construction, operational and decommissioning phases. The embedded and

	State should give great weight to any negative effects, when weighing them against the wider benefits of the application. The greater the negative impact on the significance of the designated heritage asset, the greater the benefits that will be needed to justify approval.	the Secretary of State should give great weight to any negative effects, when weighing them against the wider benefits of the application. The greater the negative impact on the significance of the designated heritage asset, the greater the benefits that will be needed to justify approval.	additional mitigation measures are documented within the: **oCEMP [APP/7.6], oCTMP [APP/7.7], oOEMP [APP/7.8], oDS [APP/7.10],** and **oLEMP [APP/7.11]** and are secured via requirements of the **draft DCO [APP/3.1].**
Part 5.10 - Landscape and Visual ***Applicant Assessment***	5.10.5 Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation.	5.10.5 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.	**ES Chapter 6: Landscape and Visual [APP/6.2]** provides an assessment of the Scheme's impact on landscape and visual receptors, identifying construction, operational phases (short, medium, and long term), and decommissioning as the phases for assessment across the Scheme. **ES Chapter 6: Landscape and Visual [APP/6.2]** concludes the following significant residual adverse impacts: • D1: Swaffham Heath LCA: there are moderate adverse effects across all phases of the Scheme. • E6: North Pickenham Plateau LCA: there are moderate adverse effects across all phases of the Scheme. • VRG1: Central Site Area: there are major-moderate adverse effects across construction, decommissioning, and operational (short and medium term) phases of the Scheme. • VRG2: North-Eastern Site Area: there are major-moderate adverse effects across construction, decommissioning, and operational (short and medium term) phases of the Scheme. • VRG3: Nar Valley Southern Slope and Settlement Edge of South Acre: there are moderate adverse effects across construction, decommissioning, and operational (short term) phases of the Scheme. • The Peddars Way and Norfolk Coastal Path: there are moderate adverse effects across construction, decommissioning phases of the Scheme. • The Peddars Way and Norfolk Coastal Path, Over a limited extent only. Within and up to 300m from the Site: there are moderate adverse effects across the operational (short and medium term) phase of the Scheme. • Rebellion Way Cycle Route: there are moderate adverse effects across construction, decommissioning phases of the Scheme. • Rebellion Way Cycle Route, Over a limited extent only. Within the Site: there are moderate adverse effects across the operational (short and medium term) phase of the Scheme. The mitigation hierarchy has been applied throughout the design and development of the Scheme landscape and visual impacts have been minimised as far as practicable. The residual effects above cannot be mitigated further. Through the application of good design principles including the application of the mitigation hierarchy, a robust approach to secure good design would be achieved. Despite this approach, some significant residual visual effects would remain to two landscape receptors as summarised above. Paragraph 5.10.35 of NPS EN-1 confirms that "*The scale of energy projects means that they will often be visible across a very wide area. The Secretary of State should judge whether any adverse impact on the landscape*

			would be so damaging that it is not offset by the benefits (including need) of the project." Section 6.11 of **ES Chapter 6: Landscape and Visual [APP/6.2]** describes the existing levels and assesses the anticipated cumulative landscape and visual effects of the Scheme's construction, operational (short, medium and long term), and decommissioning, in accordance with this policy. **ES Chapter 6: Landscape and Visual [APP/6.2]** concludes the following significant residual adverse cumulative impacts, cumulatively with High Grove Solar: • E6: North Pickenham Plateau LCA: there are significant adverse effects across all phases of the two developments. • VRG4: Great Palgrave and Little Palgrave: there are significant adverse effect for users of PRoW Sporle with Palgrave BR5 across the construction and decommissioning phases of the two developments. With the critical and urgent need for the Scheme enshrined in national and local policy, it is considered that the identified residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case in accordance with Paragraphs 5.10.12, 5.10.14 and 5.10.35 of NPS EN-1.
	5.10.6 Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.	5.10.6 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.	The **Design Approach Document [APP/5.7]** sets out Project Principles which have influenced the design evolution to avoid and minimise harm on landscape. Project Principle 2.1 sets out that the Scheme should respond to the character of the Site, informed by the Breckland Local Landscape Character Assessment.
	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.	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.	**ES Chapter 3: Order limits and Context [APP/6.1]** confirms that the Order limits have been selected and designed to avoid designated areas. The Order limits are not covered by any statutory ecological designations, nor is it an ancient woodland. None of the land within the Order limits is covered by any statutory landscape designations, i.e. National Parks or National Landscapes.

	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.	5.10.12 Outside nationally designated areas, there are local landscapes that may be highly valued locally. Where a local development document in England or a local development plan in Wales has policies based on landscape or waterscape character assessment, these should be paid particular attention. However, locally valued landscapes should not be used in themselves to refuse consent, as this may unduly restrict acceptable development.	The **Design Approach Document [APP/5.7]** sets out Project Principles which have influenced the design evolution to avoid and minimise harm on the landscape. Project Principle 2.1 sets out that the Scheme should respond to the character of the Site, informed by the Breckland Local Landscape Character Assessment.
	5.10.13 All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites.	5.10.13 All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites.	The anticipated main area of visibility, referred to as the 'Zone of Visual Influence' ('ZVI'), is described below and shown on **ES Figure 6.7: Visual Receptor Groups [APP/6.3].**
	5.10.14 The Secretary of State will have to judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the project.	5.10.14 The Secretary of State will have to judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the project.	**ES Chapter 6: Landscape and Visual [APP/6.2]** provides an assessment of the Scheme's impact on landscape and visual within the Order limits, or that will be impacted by the Scheme. As set out in Section 10 of the **Planning Statement [APP/5.5],** it is considered that the wider benefits of the Scheme as CNP infrastructure, delivery of a significant level of low carbon energy generation and biodiversity net gain and the provision of permissive paths outweigh the adverse residual effects of the Scheme. Therefore, the Scheme is considered acceptable in terms of its overall landscape, visual and residential amenity impacts and that the nature of the visual impacts is not considered to outweigh the substantial benefits of the Scheme.
Applicant assessment	5.10.16 The applicant should carry out a landscape and visual impact assessment and report it in the ES, including cumulative effects (see Section 4.3). Several guides have been produced to assist in addressing landscape issues.	5.10.16 The applicant should carry out a landscape and visual impact assessment and report it in the ES, including cumulative effects (see Section 4.3). Several guides have been produced to assist in addressing landscape issues.	**ES Chapter 6: Landscape and Visual [APP/6.2]** provides an assessment of the Scheme's impact on landscape and visual within the Order limits, or that will be impacted by the Scheme in accordance with Paragraph 5.10.16 of NPS EN-1. It also includes references to local and national landscape character assessments and associated studies as a means of assessing landscape impacts. Section 6.11 of **ES Chapter 6: Landscape and Visual [APP/6.2]** describes the existing levels and assesses the anticipated cumulative landscape and visual effects of the Scheme's construction, operational (short, medium and long term), and decommissioning, in accordance with this policy.
	5.10.17 The landscape and visual assessment should include reference to any landscape character assessment and associated studies as a means of assessing landscape impacts relevant to the proposed project. The applicant's assessment should also take account of any relevant policies based on these assessments in local development documents in England and local development plans in Wales.	5.10.17 The landscape and visual assessment should include reference to any landscape character assessment and associated studies as a means of assessing landscape impacts relevant to the proposed project. The applicant's assessment should also take account of any relevant policies based on these assessments in local development documents in England and local development plans in Wales.	
	5.10.19 The applicant should consider landscape and visual matters in the early stages of siting and design, where site choices and design principles are being established. This will allow the applicant to demonstrate in the ES how negative effects have been minimised and	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	Potential landscape and visual effects, as well as mitigation measures, have been considered from the outset of the Scheme. As outlined in the **Design Approach Document [APP/5.7],** throughout the design process, the Applicant adopted an interdisciplinary approach to design, considering both the opportunities and constraints of the Scheme. This included analysis of the existing physical,

	opportunities for creating positive benefits or enhancement have been recognised and incorporated into the design, delivery and operation of the scheme.	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.	environmental, social and cultural context of the Site by a broad range of technical disciplines (including landscape and visual, noise, ecology and heritage). **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** describes the consideration of reasonable alternatives carried out by the Applicant in relation to the Site for the Scheme, layouts and choice of technology. It is supported by **Appendix 1: Site Evaluation Report** to the **Planning Statement [APP/5.5]**, which provides an appraisal of alternative sites and demonstrates consideration of relevant policy and its applicability to the site evaluation process undertaken by the Applicant. The Site evaluation involved a number of factors, including, but not limited to irradiance and site topography, such as a preference for south-facing aspect and/or flatter topography.
	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.	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 a National Landscape the assessment should include effects on the natural beauty, special qualities and key characteristics of these areas.	**ES Chapter 3: Order limits and Context [APP/6.1]** confirms that the Order limits have been selected and designed to avoid designated areas. The Order limits are not covered by any statutory ecological designations, nor is it an ancient woodland. None of the land within the Order limits is covered by any statutory landscape designations, i.e. National Parks or National Landscapes.
	5.10.21 The assessment should include the visibility and conspicuousness of the project during construction and of the presence and operation of the project and potential impacts on views and visual amenity. This should include light pollution effects, including on dark skies, local amenity, and nature conservation.	5.10.21 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.	Photographs and visualisations have been included to support the descriptions of baseline views and visual effects in reference to the viewpoints, which were agreed upon through consultation with the relevant local planning authority. A range of visualisations have been prepared in support of the LVIA within **ES Chapter 6: Landscape and Visual [APP/6.2]**. Photowire and visualisations are presented in: • **Figure 6.10: PP1-16 and PPa-g Winter Photograph Panels [APP/6.3]** • **Figure 6.11: PP1-16 and PPa-g Summer Photograph Panels [APP/6.3]** • **Figure 6.12: PM6, PM8, PM12 and PM14 Parameter Based Winter Photowires [APP/6.3]** • **Figure 6.13: PM6, PM8, PM12 and PM14 Parameter Based Summer Photowires [APP/6.3]** • **Figure 6.14: PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme [APP/6.3]**; and • **Figure 6.15: PM8, PM12 and PM14 Summer Photomontages - Illustrative Scheme [APP/6.3].** The Site is not in a recognised dark sky landscape. **ES Chapter 5: The Scheme [APP/6.1]** sets out that pole mounted internal facing closed circuit television (CCTV) systems installed at a height of up to 3m will be deployed around the perimeter of the Site. The CCTV cameras would use night-vision technology, which would be monitored remotely and avoid the need for night-time lighting of the Solar PV Site, as secured through the **Design Principles, Parameters and Commitments [APP/5.8]**. The DCO Application is accompanied

			by **ES Appendix 6.7: Residential Visual Amenity Assessment [APP/6.4],** which considered the effects on residential visual amenity.
	5.10.22 The assessment should also address the landscape and visual effects of noise and light pollution, and other emissions (see Section 5.2 and Section 5.7), from construction and operational activities on residential amenity and on sensitive locations, receptors and views, how these will be minimised.	5.10.22 The assessment should also address the landscape and visual effects of noise and light pollution, and other emissions (see Section 5.2 and Section 5.7), from construction and operational activities on residential amenity and on sensitive locations, receptors and views, and how these will be minimised.	**ES Chapter 6: Landscape and Visual [APP/6.2]** provides an assessment of the Scheme's impact on landscape and visual within the Order limits, or that will be impacted by the Scheme. The chapter is accompanied by **ES Appendix 6.7: Residential Visual Amenity Assessment [APP/6.4],** which considered the effects on residential visual amenity. Residents are identified as a primary visual receptor within the study area likely to be affected by the Scheme. Residential properties included in the study area are shown on **ES Figure 6.9: Residential Properties [APP/6.3]. ES Appendix 6.7: Residential Visual Amenity Assessment [APP/6.4]** concludes that the Residential Visual Amenity threshold would not be reached for any properties within the study area. Effects on all properties would not be sufficiently "oppressive" or "overbearing" that any property would be rendered an unattractive place in which to live.
	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.	5.10.24 Applicants should consider how landscapes can be enhanced using landscape management plans, as this will help to enhance environmental assets where they contribute to landscape and townscape quality.	The DCO Application secures a detailed Landscape and Ecological Management Plan(s) based on the **oLEMP [APP/7.11]** and secured through the requirement of the **draft DCO [APP/3.1]**, which provides the framework for the management plan that will be implemented.
	5.10.25 In considering visual effects it may be helpful for applicants to draw attention, in the supporting evidence to their applications, to any examples of existing permitted infrastructure they are aware of with a similar magnitude of impact on equally sensitive receptors. This may assist the Secretary of State in judging the weight they should give to the assessed visual impacts of the proposed development.	5.10.25 In considering visual effects it may be helpful for applicants to draw attention, in the supporting evidence to their applications, to any examples of existing permitted infrastructure they are aware of with a similar magnitude of impact on equally sensitive receptors. This may assist the Secretary of State in judging the weight they should give to the assessed visual impacts of the proposed development.	Section 6.6 of **ES Chapter 6: Landscape and Visual [APP/6.2]** establishes an environmental baseline for the Landscape Visual Impact Assessment, including existing overhead electrical lines, quarries and road infrastructure in the landscape.
Mitigation	5.10.26 Reducing the scale of a project can help to mitigate the visual and landscape effects of a proposed project. However, reducing the scale or otherwise amending the design of a proposed energy infrastructure project may result in a significant operational constraint and reduction in function – for example, electricity generation output. There may, however, be exceptional circumstances, where mitigation could have a very significant benefit and warrant a small reduction in function. In these circumstances, the Secretary of State may decide that the benefits of the mitigation to reduce the landscape and/or visual effects outweigh the marginal loss of function.	5.10.26 Reducing the scale of a project can help to mitigate the visual and landscape effects of a proposed project. However, reducing the scale or otherwise amending the design of a proposed energy infrastructure project may result in a significant operational constraint and reduction in function – for example, electricity generation output. There may, however, be exceptional circumstances, where mitigation could have a very significant benefit and warrant a small reduction in function. In these circumstances, the Secretary of State may decide that the benefits of the mitigation to	**ES Chapter 6: Landscape and Visual [APP/6.2]** provides an assessment of the Scheme's impact on landscape and visual within the Order limits, or that will be impacted by the Scheme and identifies construction, operational (short, medium and long term) and decommissioning as the phases for assessment across the Scheme. At the site level, a comprehensive mitigation package has been embedded into the design of the Scheme to date with further additional mitigation commitments made to minimise any likely significant impacts. However, the nature of the Scheme, the sensitivity of receptors, the local context of cumulative development and the existing rural context mean that there are some impacts which cannot be mitigated further without giving rise to significant operational constraints and/or a reduction in function which fundamentally undermines the commercial viability of the Scheme. The embedded and additional mitigation measures are documented within the **oCEMP [APP/7.6], oOEMP [APP/7.8], oDS [APP/7.10]**, and **oLEMP [APP/7.11]**, and secured via the requirements of the **draft DCO [APP/3.1].**

		reduce the landscape and/or visual effects outweigh the marginal loss of function.	The **Design Approach Document [APP/5.7]** outlines the Project Principles that have influenced the design evolution, aiming to avoid and minimise harm to the landscape. Project Principle 2.1 sets out that the Scheme should respond to the character of the Site, informed by the Breckland Local Landscape Character Assessment. The **Design Principles, Parameters, and Commitments [APP/5.8]** outline the parameters, including the colour of the relevant aspects of the Scheme, as well as the maximum and minimum parameters assessed within the ES.
	5.10.27 Adverse landscape and visual effects may be minimised through appropriate siting of infrastructure within its development site and wider setting. The careful consideration of colours and materials will support the delivery of a well-designed scheme, as will sympathetic landscaping and management of its immediate surroundings.	5.10.27 Adverse landscape and visual effects may be minimised through appropriate siting of infrastructure within its development site and wider setting. The careful consideration of colours and materials will support the delivery of a well-designed scheme, as will sympathetic landscaping and management of its immediate surroundings.	
	5.10.28 Depending on the topography of the surrounding terrain and areas of population it may be appropriate to undertake landscaping off site. For example, filling in gaps in existing tree and hedge lines may mitigate the impact when viewed from a more distant vista.	5.10.28 Depending on the topography of the surrounding terrain and areas of population it may be appropriate to undertake landscaping off site. For example, filling in gaps in existing tree and hedge lines may mitigate the impact when viewed from a more distant vista.	The Scheme will not undertake any landscaping off-site as this is not considered necessary at this stage to mitigate the impacts of the Scheme.
Secretary of State decision making	5.10.29 The Secretary of State should take into consideration the level of detailed design which the applicant has provided and is secured in the Development Consent Order, and the extent to which design details are subject to future approvals.	5.10.29 The Secretary of State should take into consideration the level of detailed design which the applicant has provided and is secured in the Development Consent Order, and the extent to which design details are subject to future approvals.	The Applicant wishes to retain flexibility regarding the design detail of certain components of the Scheme. The extent of flexibility required is described in **ES Chapter 5: The Scheme [APP/6.1]** and set out in the **Design Approach Document [APP/5.7]** and **Design Principles, Parameters and Commitments [APP/5.8]**. The Applicant's approach to EIA, including the use of the Rochdale envelope to assess effects, is set out in **ES Chapter 5: The Scheme [APP/6.1]** and **ES Chapter 3: EIA Process and Methodology [APP/6.1]**. With the above need for flexibility in mind, the Applicant confirms that the ES has assessed the likely worst-case development scenario. Establishing the maximum and, where relevant, minimum parameters enables a robust assessment of likely significant environmental effects to be undertaken within the ES for topics where the nature of the assessment requires a specific level of detail, such as maximum heights, massing, or noise levels. Thus, the assessment parameters serve as the basis for the assessment. The assessment parameters are detailed in the works descriptions, which are linked to Schedule 1 within the **draft DCO [APP/3.1]** and are spatially shown in the **Works Plan [APP/2.3]** and a number of control documents, as listed within the **Guide to the Application [APP/1.2].**
	5.10.30 The Secretary of State should be satisfied that local authorities will have sufficient design content secured to ensure future consenting will meet landscape, visual and good design objectives.	5.10.30 The Secretary of State should be satisfied that local authorities will have sufficient design content secured to ensure future consenting will meet landscape, visual and good design objectives.	As detailed in Section 2 of the **Planning Statement [APP/5.5]**, good design has been a fundamental consideration from the outset of the Scheme. The **Design Approach Document [APP/5.7]** demonstrates how the design of the Scheme has been developed in accordance with a clear design framework, based on the criteria for good design set out in NPS EN-1. This has included the adoption of project level design principles (Project Principles) to guide decision making and embed good design outcomes to the Scheme. Throughout the design process, the Applicant maintained an interdisciplinary approach to design, considering both the opportunities and constraints of the

			Scheme. This included an analysis of the existing physical, environmental, social, and cultural context of the Site by a broad range of technical disciplines (including landscape and visual, noise, ecology, and heritage) as set out and assessed by **ES Topic Chapters [APP/6.2].**
	5.10.32 When considering applications for development within National Parks, the Broads and AONBs the conservation and enhancement of the natural beauty should be given substantial weight by the Secretary of State in deciding on applications for development consent in these areas. The Secretary of State may grant development consent in these areas in exceptional circumstances. Such development should be demonstrated to be in the public interest and consideration of such applications should include an assessment of: • the need for the development, including in terms of national considerations, and the impact of consenting or not consenting it upon the local economy; • the cost of, and scope for, developing all or part of the development elsewhere outside the designated area or meeting the need for it in some other way, taking account of the policy on alternatives set out in Section 4.3; and • any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.	5.10.32 When considering applications for development within National Parks, the Broads and AONBs the conservation and enhancement of the natural beauty should be given substantial weight by the Secretary of State in deciding on applications for development consent in these areas. The Secretary of State may grant development consent in these areas in exceptional circumstances. Such development should be demonstrated to be in the public interest and consideration of such applications should include an assessment of: • the need for the development, including in terms of national considerations, and the impact of consenting or not consenting it upon the local economy; • the cost of, and scope for, developing all or part of the development elsewhere outside the designated area or meeting the need for it in some other way, taking account of the policy on alternatives set out in Section 4.3; and • any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.	**ES Chapter 3: Order limits and Context [APP/6.1]** confirms that the Order limits have been selected and designed to avoid designated areas. The Order limits are not covered by any statutory ecological designations, nor is it an ancient woodland. None of the land within the Order limits is covered by any statutory landscape designations, i.e. National Parks or National Landscapes.

	5.10.34 The duty to seek to further the purposes of nationally designated landscapes also applies when considering applications for projects outside the boundaries of these areas, which may have impacts within them. The aim should be to avoid harming the purposes of designation or to minimise adverse effects on designated landscapes, and such projects should be designed sensitively given the various siting, operational, and other relevant constraints. The fact that a proposed project will be visible from within a designated area should not in itself be a reason for the Secretary of State to refuse consent.	5.10.34 The duty to seek to further the purposes of nationally designated landscapes also applies when considering applications for projects outside the boundaries of these areas, which may have impacts within them. The aim should be to avoid harming the purposes of designation or to minimise adverse effects on the designation. Such projects should be designed sensitively given the various siting, operational, and other relevant constraints. The fact that a proposed project will be visible from within a designated area should not in itself be a reason for the Secretary of State to refuse consent.	
	5.10.35 The scale of energy projects means that they will often be visible across a very wide area. The Secretary of State should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project.	5.10.35 The scale of energy projects means that they will often be visible across a very wide area. The Secretary of State should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project.	As set out in **ES Chapter 6: Landscape and Visual [APP/6.2].** The avoidance of effects is always challenging when there is a physical change to land use. However, the landscape and visual sensitivities of the Site have influenced masterplanning of the Scheme through an iterative design process. Thus, the Site incorporates a degree of integral (or embedded) mitigation measures designed to avoid or reduce potential landscape and visual effects. The following elements comprise key design landscape and visual mitigation measures embedded into the design of the Scheme, and secured via the **oLEMP [APP/7.11]**: • Retention of the existing landscape fabric within and around the boundaries of the Site • Offset and buffering of the Scheme with new hedgerow and tree planting • Retention, gapping up and enhancement of existing hedgerow within the Site • Setting back the Scheme from key landscape features within and adjacent to the Site, such as trees, hedgerow and woodland; and • Recreational enhancements. As recognised in NPS EN-1 paragraph 5.10.5, the development of new energy infrastructure, at the scale and speed required to meet the current and future needs identified, is likely to have some negative effects on landscape and visual amenity which may not be able to be mitigated. It is considered that the wider benefits of the Scheme, as CNP infrastructure, delivery of a significant level of low carbon energy generation, biodiversity net gain and the provision of permissive paths, outweigh the adverse residual effects of the Scheme. Therefore, the Scheme is considered acceptable in terms of its overall landscape, visual and residential amenity impacts and that the nature of the visual impacts is not considered to outweigh the substantial benefits of the Scheme. A more detailed consideration of the planning balance is contained within Section 10 of the **Planning Statement [APP/5.5].**
	5.10.36 In reaching a judgement, the Secretary of State should consider whether any adverse impact is temporary, such as during	5.10.36 In reaching a judgement, the Secretary of State should consider whether any adverse impact is temporary, such as	As set out in **Chapter 5: The Scheme [APP/6.1]**, the operational life of the Scheme is for a period up to 60 years, secured via a requirement of the **draft DCO [APP/3.1].** Decommissioning is expected to take between 12 and 24 months, and for the

	construction, and/or whether any adverse impact on the landscape will be capable of being reversed in a timescale that the Secretary of State considers reasonable.	during construction, and/or whether any adverse impact on the landscape will be capable of being reversed in a timescale that the Secretary of State considers reasonable.	purposes of the assessment, is expected to occur after the 60-year design life of the Scheme in 2093. Effects arising during the construction stage will be temporary, limited to the construction period only and reversible. The effects identified during the decommissioning phase are likely to be similar to construction effects, including being temporary and reversible.
	5.10.37 The Secretary of State should consider whether the project has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to minimise harm to the landscape, including by appropriate mitigation.	5.10.37 The Secretary of State should consider whether the project has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to minimise harm to the landscape, including by appropriate mitigation.	As detailed in Section 2 of the **Planning Statement [APP/5.5]**, good design has been a fundamental consideration from the outset of the Scheme. The **Design Approach Document [APP/5.7]** demonstrates how the design of the Scheme has been developed in accordance with a clear design framework, based on the criteria for good design set out in NPS EN-1. This has included the adoption of project level design principles (Project Principles) to guide decision making and embed good design outcomes to the Scheme. 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) as set out and assessed by **ES Topic Chapters [APP/6.2].** The **Design Approach Document [APP/5.7]** sets out Project Principles which have influenced the design evolution to avoid and minimise harm on landscape. Project Principle 2.1 sets out that the Scheme should respond to the character of the Site, informed by the Breckland Local Landscape Character Assessment. Landscape and ecological enhancements and mitigation measures for the Scheme are shown on **Appendix 1: Green Infrastructure Strategy Plans** to the **oLEMP [APP/7.11]**.
	5.10.38 The Secretary of State should consider whether requirements to the consent are needed requiring the incorporation of particular design details that are in keeping with the statutory and technical requirements for landscape and visual impacts.	5.10.38 The Secretary of State should consider whether requirements to the consent are needed requiring the incorporation of particular design details that are in keeping with the statutory and technical requirements for landscape and visual impacts.	The **Works Plan [APP/2.3]** and the **Design Principles, Parameters and Commitments [APP/5.8]** secure the design of the Scheme through the **draft DCO [APP/3.1],** in line with statutory and technical requirements.
Part 5.11 Land Use, Including Open Space, Green Infrastructure, and Green Belt ***Applicant Assessment***	5.11.8 The ES (see Section 4.3) should identify existing and proposed land uses near the project, any effects of replacing an existing development or use of the site with the proposed project or preventing a development or use on a neighbouring site from continuing. Applicants should also assess any effects of precluding a new development or use proposed in the development plan. The assessment should be proportionate to the scale of the preferred scheme and its likely impacts on such receptors. For developments on previously developed land, the applicant should ensure that they have considered the risk posed by land	5.11.8 The ES (see Section 4.3) should identify existing and proposed land uses near the project, any effects of replacing an existing development or use of the site with the proposed project or preventing a development or use on a neighbouring site from continuing. Applicants should also assess any effects of precluding a new development or use proposed in the development plan. The assessment should be proportionate to the scale of the preferred scheme and its likely impacts on such receptors. For developments on previously developed land, the applicant should ensure that they have considered	**ES Chapter 14: Socio-Economics [APP/6.2]** confirms that the Site includes landholdings for agricultural business. The assessment concludes that the Scheme's construction, operational and decommissioning phases will have a minor adverse effect on land use, which is not significant in EIA terms. The surrounding land is predominantly agricultural. The Scheme is not considered to impact the continued use of this land for agricultural purposes.

	contamination and how it is proposed to address this.	the risk posed by land contamination and how it is proposed to address this.	
	5.11.9 Applicants will need to consult the local community on their proposals to build on existing open space, sports or recreational buildings and land. Taking account of the consultations, applicants should consider providing new or additional open space including green and blue infrastructure, sport or recreation facilities, to substitute for any losses as a result of their proposal. When considering proposals for green infrastructure, Applicant's should refer to the Green Infrastructure Framework.	5.11.9 Applicants will need to consult the local community on their proposals to build on existing open space, sports or recreational buildings and land. Taking account of the consultations, applicants should consider providing new or additional open space including green and blue infrastructure, sport or recreation facilities, to substitute for any losses as a result of their proposal. When considering proposals for green infrastructure, Applicant's should refer to the Green Infrastructure Framework.	The Scheme does not impact any open space, sports or recreational buildings or land. The Scheme does not involve the loss of playing fields.
	5.11.10 Applicants should use any up-to-date local authority assessment or, if there is none, provide an independent assessment to show whether the existing open space, sports and recreational buildings and land is surplus to requirements.	5.11.10 Applicants should use any up-to-date local authority assessment or, if there is none, provide an independent assessment to show whether the existing open space, sports and recreational buildings and land is surplus to requirements.	
	5.11.11 During any pre-application discussions with the applicant the LPA should identify any concerns it has about the impacts of the application on land use, having regard to the development plan and relevant applications and including, where relevant, whether it agrees with any independent assessment that the land is surplus to requirements.	5.11.11 During any pre-application discussions with the applicant the LPA should identify any concerns it has about the impacts of the application on land use, having regard to the development plan and relevant applications and including, where relevant, whether it agrees with any independent assessment that the land is surplus to requirements.	Section 1.2 of **ES Chapter 11: Soils and Agricultural [APP/6.2]**, the **Consultation Report [APP/5.1]** and the **Consultation Report Appendices [APP/5.2]** set out the discussions between the Applicant and the Local Planning Authority about land use.
	5.11.12 Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5).	5.11.12 Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5).	The Applicant has developed the design of the Scheme to minimise the land take of BMV land, where practicable. **ES Chapter 11: Soils and Agricultural [APP/6.2]** describes the existing levels and assesses the anticipated soil effects of the Scheme's construction, operational and decommissioning phases, in accordance with this policy. Agricultural land quality was a key consideration in the Applicant's site selection process. As set out in **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]**, the Applicant has sought to identify non-BMV agricultural land in its site selection for the Scheme. Appendix 1 of the **Planning Statement [APP/5.5]** provides an overview of the site evaluation process, which sets out that the Site's suitability is due to the lack of landscape and environmental statutory designations, limited residential receptors, the absence of BMV on the published "provisional" ALC maps, and the Likelihood of BMV maps and accessibility from a major highway network. However, the Applicant has now undertaken a soil classification survey and a subsequent detailed ALC survey, as set out in **ES Appendix 11.2: Agricultural Land Classification [APP/6.4],** which has identified

			areas of grade 1, 2, and 3a, contrary to the expectations outlined in the published information. The Scheme is temporary and reversible in nature and therefore will not affect the long-term agricultural resource. Upon decommissioning, all land, including the BESS Area and Customer Substation but excluding the National Grid Substation and Grid Connection Infrastructure, will be returned to its previous use and condition as far as is practicable. The decommissioning measures set out in the **oDS [APP/7.10]** are secured by requirement 20 in Schedule 2 of the **dDCO [APP/3.1]**. The design of the Solar PV Sites allows some farming practices to continue during operation of the Scheme, such as sheep grazing, therefore, whilst the land would not be available for crop production, there may be an opportunity to limit the effects on agricultural production during the Scheme's lifetime through other forms of agricultural practice. Mitigation is proposed as set out in the **oSMP [APP/7.13]** to reduce the effects on soils as a result of the Scheme. The construction, operation, and decommissioning of the Scheme is anticipated to result in a minor beneficial effect on soil resources. Further details are provided in **ES Chapter 11: Soils and Agriculture [APP/6.2]**. The benefits of the Scheme justify the inclusion of BMV land, namely the Scheme's contribution to meeting the established and urgent need for renewable energy infrastructure such as solar, which has been identified as a critical national priority in NPS EN-1 Part 4.2 and the other wider economic and environmental benefits set out in Section 5.3 of the **Planning Statement [APP/5.5]**. **Appendix 1: Site Evaluation Report** to the **Planning Statement [APP/5.5]** outlines that the Applicant considered factors, including but not limited to the site area, topography, access, and the absence of designations, when determining the suitability of the available land. The Applicant concluded that the land found was suitable.
	5.11.13 Applicants should also identify any effects and seek to minimise impacts on soil health and protect and improve soil quality taking into account any mitigation measures proposed.	5.11.13 Applicants should also identify any effects and seek to minimise impacts on soil health and protect and improve soil quality taking into account any mitigation measures proposed.	**ES Chapter 11: Soil and Agriculture [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, there would be no significant adverse effects on soil throughout the Scheme. Section 4.6 of the **oSMP [APP/7.13],** which is secured through the **draft DCO [APP/3.1],** which is secured through the **draft DCO [APP/3.1],** sets out the following good practice measures to avoid damage to soil structure: • Suitably qualified soil scientists will be appointed by the contractor to oversee and define all soil management good practice measures • Soil resources will be clearly identified (usually by texture and/or colour) to avoid mixing of topsoils with subsoils when excavating and filling the trenches • No trafficking of vehicles/plant or materials storage will occur on reinstated soil, wherever practicable • Disturbance to soils will be minimised at all stages; for example, avoiding unnecessary repeat movements over the same ground • The movement of vehicles and plant will be restricted to designated access and haul routes • Multiple handling of soils will be avoided

			• Soil handling, including tracking over the soil with machinery, will only take place in suitable soil moisture and weather conditions • Soils will only be stored in designated stockpiles • Long-term (over 6 months) stockpiles will be seeded to prevent wind and water erosion; and • Records of soil handling operations and stockpiles will be kept.
	5.11.14 Applicants are encouraged to develop and implement a Soil Management Plan which could help minimise potential land contamination. The sustainable reuse of soils needs to be carefully considered in line with good practice guidance where large quantities of soils are surplus to requirements or are affected by contamination.	5.11.14 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.	An **oSMP [APP/7.13]** has been submitted with this application and includes: • Details of relevant guidance relating to soil resources and their management • Relevant background information, including climate, geology, altitude, topography, soil type and land use, and descriptions of the soil resources identified in the survey work undertaken across the Scheme • Appropriate soils handling methods for stripping, stockpiling and reinstatement of soils; and • Monitoring procedures. The objective of the **oSMP [APP/7.13],** which is secured through the draft DCO **[APP/3.1],** is to identify the importance and sensitivity of the soil resource and to provide specific guidance to ensure that there is no significant adverse effect on the soil resource as a result of the Scheme.
	5.11.17 Applicants should ensure that a site is suitable for its proposed use, taking account of ground conditions and any risks arising from land instability and contamination.	5.11.17 Applicants should ensure that a site is suitable for its proposed use, taking account of ground conditions and any risks arising from land instability and contamination.	**ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** outlines the suitability of the land for solar development, which is hindered by the lack of landscape and environmental statutory designations, limited residual receptors, limited Flood Zone and accessibility from a major highway network. **ES Chapter 11: Soils and Agriculture [APP/6.2]** concludes that there are not any risks associated with land instability and contamination as a result of former activities.
	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.	5.11.19 Applicants should safeguard any mineral resources on the proposed site as far as possible, taking into account the long-term potential of the land use after any future decommissioning has taken place.	The **Planning Statement [APP/5.5]** confirms that small areas of the Order limits lie within Mineral Safeguarding Areas (sand and gravel) as defined in the adopted Norfolk Minerals and Waste Local Plan (2025). The **ES Appendix 2.2: Scoping Opinion Response [APP/6.4]** confirms that, "*the Mineral Planning Authority does not consider that the proposed development would result in the needless sterilisation of safeguarded mineral resources, and although mineral resource safeguarding is not mentioned as a topic within the Scoping Report, mineral resource safeguarding issues can be scoped out of the assessment*".
Mitigation	5.11.23 Although in the case of most energy infrastructure there may be little that can be done to mitigate the direct effects of an energy project on the existing use of the proposed site (assuming that some of that use can still be retained post project construction) applicants should nevertheless seek to minimise these effects and the effects on existing or planned uses near the site by the application of good design principles, including the layout of the	5.11.23 Although in the case of most energy infrastructure there may be little that can be done to mitigate the direct effects of an energy project on the existing use of the proposed site (assuming that some of that use can still be retained post project construction) applicants should nevertheless seek to minimise these effects and the effects on existing or planned uses near the site by the application of good design principles, including the layout of the	**ES Chapter 14: Socio-Economics [APP/6.2]** confirms that the Site includes landholdings for agricultural business. The assessment concludes that the Scheme's construction, operational and decommissioning phases will have a minor adverse effect on land use, which is not significant in EIA terms. The surrounding land is predominantly agricultural. The Scheme is not considered to impact the continued use of this land for agricultural purposes. The Applicant has developed the design of the Scheme to minimise the land take of BMV land, where practicable. **ES Chapter 11: Soils and Agricultural [APP/6.2]** describes the existing levels and assesses the anticipated soil effects of the

	project and the protection of soils during construction.	project and the protection of soils during construction.	Scheme's construction, operational and decommissioning phases, in accordance with this policy. Section 4.6 of the **oSMP [APP/7.13]** sets out the following good practice measures to avoid damage to soil structure: • Suitably qualified soil scientists will be appointed by the contractor to oversee and define all soil management good practice measures • Soil resources will be clearly identified (usually by texture and/or colour) to avoid mixing of topsoils with subsoils when excavating and filling the trenches • No trafficking of vehicles/plant or materials storage will occur on reinstated soil, wherever practicable • Disturbance to soils will be minimised at all stages; for example, avoiding unnecessary repeat movements over the same ground • The movement of vehicles and plant will be restricted to designated access and haul routes • Multiple handling of soils will be avoided • Soil handling, including tracking over the soil with machinery, will only take place in suitable soil moisture and weather conditions • Soils will only be stored in designated stockpiles • Long-term (over 6 months) stockpiles will be seeded to prevent wind and water erosion; and • Records of soil handling operations and stockpiles will be kept. The Scheme is temporary and reversible in nature and therefore will not affect the long-term agricultural resource. Upon decommissioning, all land, including the BESS Area and Customer Substation but excluding the National Grid Substation and grid connection infrastructure, will be returned to its previous use and condition as far as is practicable. The decommissioning measures outlined in the oDS are secured by Requirement 20 in Schedule 2 of the **dDCO [APP/3.1]**.
	5.11.24 Where green infrastructure is affected, the Secretary of State should consider imposing requirements to ensure the functionality and connectivity of the green infrastructure network is maintained in the vicinity of the development and that any necessary works are undertaken, where possible, to mitigate any adverse impact and, where appropriate, to improve that network and other areas of open space including appropriate access to National Trails and other public rights of way and new coastal access routes.	5.11.24 Where green infrastructure is affected, the Secretary of State should consider imposing requirements to ensure the functionality and connectivity of the green infrastructure network is maintained in the vicinity of the development and that any necessary works are undertaken, where possible, to mitigate any adverse impact and, where appropriate, to improve that network and other areas of open space including appropriate access to National Trails and other public rights of way and new coastal access routes.	Section 1.4 of the **oPRoWPPMP [APP/7.12]** outlines the mitigation measures proposed to protect green infrastructure users during necessary works: • Provision of banksmen to hold vehicles when PRoW users are present, and to advise PRoW users of potential vehicle movements • Wider access tracks to create more room for PRoW users when vehicles pass them • Reduced speed limit of 5 – 10mph • Drivers will stop and give-way to any PRoW user that they encounter • Appropriate signage will be installed to make PRoW users aware of construction activity, including times and the contact details for a public liaison officer • The PRoW will be kept clear of construction vehicles and apparatus outside of the permitted construction hours where practicable; and • Any damage to the PRoW will be repaired as soon as practicable. Section 1.5 of the **oPRoWPPMP [APP/7.12]** notes that the Applicant has proposed approximately 3785 linear metres of permissive path within the Order limits and approximately 1203 linear metres of permissive paths outside of the Order limits.

			These permissive paths aim to provide high quality green infrastructure and safe pedestrian and cycle routes. Landscape and ecological enhancements and mitigation measures for the Scheme are shown on **Appendix 1: Green Infrastructure Strategy Plans** to the **oLEMP [APP/7.11]**.
	5.11.27 Existing trees and woodlands should be retained wherever possible. In the EIP, the Government committed to increase the tree canopy and woodland cover to 16.5% of total land area of England by 2050. The applicant should assess the impacts on, and loss of, all trees and woodlands within the project boundary and develop mitigation measures to minimise adverse impacts and any risk of net deforestation as a result of the scheme. Mitigation may include, but is not limited to, the use of buffers to enhance resilience, improvements to connectivity, and improved woodland management. Where woodland loss is unavoidable, compensation schemes will be required, and the long-term management and maintenance of newly planted trees should be secured	Existing trees and woodlands should be retained wherever possible. In the Environmental Improvement Plan, the government committed to increase the tree canopy and woodland cover to 16.5% of total land area of England by 2050. The Environmental Improvement Plan recognises the need to protect and increase tree canopy and woodland covers. The applicant should assess the impacts on, and loss of, all trees and woodlands within the project boundary and develop mitigation measures to minimise adverse impacts and any risk of net deforestation as a result of the scheme. Mitigation may include, but is not limited to, the use of buffers to enhance resilience, improvements to connectivity, and improved woodland management. Where woodland loss is unavoidable, compensation schemes will be required, and the long-term management and maintenance of newly planted trees should be secured. Where possible, projects should include the reuse of materials and use of sustainable materials such as timber, or recycled materials.	The ES is supported by extensive survey works which include **ES Appendix 16.4: Arboricultural Impact Assessment [APP/6.4].** **ES Chapter 7: Ecology and Biodiversity [APP/6.2]**, sets out that the design of the Scheme has evolved to avoid impacts and effects on ecology and biodiversity as far as practicable. The Scheme incorporates a number of enhancements resulting in a number of significant beneficial effects, including (but not limited to) long-term beneficial effects at the local level in relation to hedgerow and woodland habitats, as a result of the proposed hedgerow, woodland and tree planting set out in the **oLEMP [APP/7.11].** The minimum offsets from the perimeter fencing surrounding the Solar PV development are set out in the **Design Approach Document [APP/5.7].** 8m offsets are secured for hedgerows and 10m offsets are secured for hedgerows with trees. A 10m offset is secured for individual trees and groups of trees. For Veteran and Ancient trees, a buffer of 15x width of tree stem 15x width of tree stem diameter is secured. Principle 2.1 sets out that the Scheme will respond to the character of the Site, informed by the Breckland Local Landscape Character Assessment. Opportunities to conserve and enhance the character of the landscape set out in the Breckland Landscape Character Assessment include but are not limited to the: • Retention of woodland blocks which provide an important focus in the landscape; and planting of additional woodland to reinforce existing farm woodlands (providing continuity of tree cover) whilst, overall, retaining the openness and historic field structure of the arable landscape. • Conservation of the well treed hedgerows concentrated on the network of rural roads and lanes, in addition to localised enclosed lanes, which impart a historic character to the landscape and provide evidence of the former landcover pattern. This extends to the droves as important routes (now restricted byways) that cross the Site. • Succession planting of new hedgerow trees and reinforcement of field boundary hedgerows, particularly where field boundaries are degraded or have been lost due to agricultural intensification, improving the integrity of the landscape and strengthening character. • Retention and conservation of mature / veteran trees which have significant landscape, biodiversity and amenity value.
	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.	5.11.27 Where a proposed development has an impact upon a Mineral Safeguarding Area (MSA), the Secretary of State should ensure that appropriate mitigation measures have been put in place to safeguard mineral resources.	The **Planning Statement [APP/5.5]** confirms that small areas of the Order limits lie within Mineral Safeguarding Areas (sand and gravel) as defined in the adopted Norfolk Minerals and Waste Local Plan (2025). The **ES Appendix 2.2: Scoping Opinion Response [APP/6.4]** confirms that, "*the Mineral Planning Authority does not consider that the proposed development would result in the needless sterilisation of safeguarded mineral resources, and although mineral resource safeguarding is not*

	5.11.29 Where a project has a sterilising effect on land use (for example in some cases under transmission lines) there may be scope for this to be mitigated through, for example, using or incorporating the land for nature conservation or wildlife corridors or for parking and storage in employment areas.	5.11.28 Where a project has a sterilising effect on land use (for example in some cases under transmission lines) there may be scope for this to be mitigated through, for example, using or incorporating the land for nature conservation or wildlife corridors or for parking and storage in employment areas.	*mentioned as a topic within the Scoping Report, mineral resource safeguarding issues can be scoped out of the assessment".*
	5.11.30 Public Rights of way, National Trails, and other rights of access to land are important recreational facilities for example for walkers, cyclists and horse riders. The Secretary of State should expect applicants to take appropriate mitigation measures to address adverse effects on coastal access, National Trails, other rights of way and open access land and, where appropriate, to consider what opportunities there may be to improve or create new access. In considering revisions to an existing right of way, consideration should be given to the use, character, attractiveness, and convenience of the right of way.	5.11.29 Public Rights of way, National Trails, and other rights of access to land are important recreational facilities for example for walkers, cyclists and horse riders. The Secretary of State should expect applicants to take appropriate mitigation measures to address adverse effects on coastal access, National Trails, other rights of way and open access land and, where appropriate, to consider what opportunities there may be to improve or create new access. In considering revisions to an existing right of way, consideration should be given to the use, character, attractiveness, and convenience of the right of way.	Section 1.4 of the **oPRoWPPMP [APP/7.12]** outlines the mitigation measures proposed to protect PRoW users during necessary works: • Provision of banksmen to hold vehicles when PRoW users are present, and to advise PRoW users of potential vehicle movements • Wider access tracks to create more room for PRoW users when vehicles pass them • Reduced speeds limit of 5 – 10mph • Drivers will stop and give-way to any PRoW user that they encounter • Appropriate signage will be installed to make PRoW users aware of construction activity, including times and the contact details for a public liaison officer • The PRoW will be kept clear of construction vehicles and apparatus outside of the permitted construction hours where practicable; and • Any damage to the PRoW will be repaired as soon as practicable. Section 1.5 of the **oPRoWPPMP [APP/7.12]** notes that the Applicant has proposed approximately 3785 linear metres of permissive path within the Order Limits and approximately 1203 linear metres of permissive paths outside of the Order Limits. These permissive paths aim to provide high quality and safe pedestrian and cycle routes.
	5.11.31 The Secretary of State should consider whether the mitigation measures put forward by an applicant are acceptable and whether requirements or other provisions in respect of these measures should be included in any grant of development consent.	5.11.30 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.	With the mitigation measures set out in **ES Chapter 7: Ecology and Biodiversity [APP/6.2], Chapter 11: Soils and Agriculture [APP/6.2],** and **Chapter 14: Socio-Economics [APP/6.2]**, there would be no significant effect on land use across the Scheme. The embedded and additional mitigation measures are documented within the **oLEMP [APP/7.11]** and **oPRoWPPMP [APP/7.12]** and secured via corresponding requirements of the **draft DCO [APP/3.1].**
Secretary of State Decision Making	5.11.34 The Secretary of State should ensure that applicants do not site their scheme on the best and most versatile agricultural land without justification. Where schemes are to be sited on best and most versatile agricultural land the Secretary of State should take into account the economic and other benefits of that land. Where development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.	5.11.33 The Secretary of State should ensure that applicants do not site their scheme on the best and most versatile agricultural land without justification. Where schemes are to be sited on best and most versatile agricultural land the Secretary of State should take into account the economic and other benefits of that land. Where development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.	As set out in **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]**, the Applicant has sought to identify non-BMV agricultural land in its site selection for the Scheme. Appendix 1 of the **Planning Statement [APP/5.5]** provides an overview of the site evaluation process, which sets out that the Site's suitability is due to the lack of landscape and environmental statutory designations, limited residential receptors, the absence of BMV on the published "provisional" ALC maps, and the Likelihood of BMV maps and accessibility from a major highway network. However, the Applicant has now undertaken a soil classification survey and subsequent detailed ALC survey set out in **ES Appendix 11.2: Agricultural Land Classification [APP/6.4]**, which has identified areas of grade 1, 2, and 3a, contrary to the expectations of the published information. The Scheme is temporary and reversible in nature and therefore will not affect the long-term agricultural resource. Upon decommissioning, all land, including the BESS

			Area and Customer Substation but excluding the National Grid Substation and grid connection infrastructure, will be returned to its previous use and condition as far as is practicable. The decommissioning measures set out in the **oDS [APP/7.10]** are secured by requirement 20 in Schedule 2 of the **dDCO [APP/3.1]**. Section 11.8 of **ES Chapter 11: Soils and Agriculture [APP/6.2]** sets out the economic and other effects from the use of BMV land. The economic benefit of the 401ha of BMV land within the Scheme would be of the order of approximately £80,000 to £90,000 per year, and this represents the additional economic benefit from this being BMV land rather than non-BMV land. This is negligible on a regional basis, which is not significant, and therefore not significant in EIA terms. The food production benefits, using a 3:1 wheat-to-barley crop ratio, of the same BMV land would be approximately 470 tonnes per annum. With a final estimate of under 500 tonnes per annum, the benefit is negligible on both a regional and national basis. This results in a negligible effect, which is not significant. The justification for the inclusion of BMV land in the Scheme is as follows: • **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** sets out that no brownfield land sites are available at a sufficient size to accommodate the Scheme • As the Scheme is temporary and reversible in nature, **ES Chapter 11: Soils and Agriculture [APP/6.2]** sets out the measures in place to restore the land to its original use and condition as far as practicable after the decommissioning phase • The **oSMP [APP/7.13],** which is secured through the **draft DCO [APP/3.1],** sets out procedures for soil stripping, stockpiling, reinstatement, and restoration, with measures to minimise compaction and maintain soil quality. With this mitigation in place, only temporary moderate adverse effects on soil resources are anticipated, which are not considered to represent significant residual effects; and • There will be beneficial impacts on soils resulting from long-term resting from arable production, as well as benefits from activities such as continued sheep grazing which aren't significant in EIA terms but have a long-term, temporary beneficial effect.
Part 5.12 - Noise and Vibration *Applicant Assessment*	5.12.6 Where noise impacts are likely to arise from the proposed development, the applicant should include the following in the noise assessment: • a description of the noise generating aspects of the development proposal leading to noise impacts, including the identification of any distinctive tonal characteristics, if the noise is impulsive, whether the noise contains particular high or low frequency content or any temporal characteristics of the noise • identification of noise sensitive receptors and noise sensitive areas that may be affected • the characteristics of the existing noise environment • a prediction of how the noise environment will change with the proposed development	5.12.6 Where noise impacts are likely to arise from the proposed development, the applicant should include the following in the noise assessment: • a description of the noise generating aspects of the development proposal leading to noise impacts, including the identification of any distinctive tonal characteristics, if the noise is impulsive, whether the noise contains particular high or low frequency content or any temporal characteristics of the noise • identification of noise sensitive receptors and noise sensitive areas that may be affected • the characteristics of the existing noise environment	**ES Chapter 10: Noise and Vibration [APP/6.2]** presents a noise assessment in accordance with the requirements of this policy, including a description of the noise generating aspects of the development. Table 10.2 of **ES Chapter 10: Noise and Vibration [APP/6.2]** sets out the noise-sensitive receptors that have been identified through a desktop study of OS data and aerial imagery. Section 10.6 of **ES Chapter 10: Noise and Vibration [APP/6.2]** describes the existing characteristics of the noise environment for the Scheme and surrounding areas. Section 1.7 of the **ES Chapter 10: Noise and Vibration [APP/6.2]** describes the embedded design mitigation relevant to the Scheme with respect to noise and vibration, encompassing the construction, operational and decommissioning phases. Sections 10.8 and 10.10 of **ES Chapter 10: Noise and Vibration [APP/6.2]** assess the noise and vibration likely effects and residual effects, respectively, on receptors arising from the construction, decommissioning, and operational phases of the Scheme at particular times of the day and at night on the noise environment.

	○ in the shorter term, such as during the construction period ○ in the longer term, during the operating life of the infrastructure ○ at particular times of the day, evening and night (and weekends) as appropriate, and at different times of year • an assessment of the effect of predicted changes in the noise environment on any noise-sensitive receptors, including an assessment of any likely impact on health and quality of life / well-being where appropriate, particularly among those disadvantaged by other factors who are often disproportionately affected by noise-sensitive areas • if likely to cause disturbance, an assessment of the effect of underwater or subterranean noise • all reasonable steps taken to mitigate and minimise potential adverse effects on health and quality of life	• a prediction of how the noise environment will change with the proposed development ○ in the shorter term, such as during the construction period ○ in the longer term, during the operating life of the infrastructure ○ at particular times of the day, evening and night (and weekends) as appropriate, and at different times of year • an assessment of the effect of predicted changes in the noise environment on any noise-sensitive receptors, including an assessment of any likely impact on health and quality of life / well-being where appropriate, particularly among those disadvantaged by other factors who are often disproportionately affected by noise-sensitive areas • if likely to cause disturbance, an assessment of the effect of underwater or subterranean noise • all reasonable steps taken to mitigate and minimise potential adverse effects on health and quality of life	**ES Chapter 10: Noise and Vibration [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, the Scheme, together with the cumulative schemes assessed, are not considered to result in significant adverse residual noise and vibration effects.
	5.12.7 The nature and extent of the noise assessment should be proportionate to the likely noise impact.	5.12.7 The nature and extent of the noise assessment should be proportionate to the likely noise impact.	**S Chapter 10: Noise and Vibration [APP/6.2]** presents a noise assessment in accordance with the requirements of this policy, including a description of the noise generating aspects of the development. The noise assessment is proportionate to the likely noise impact. Following the implementation of embedded and additional mitigation measures, no significant residual effects are anticipated on any noise sensitive receptors.
	5.12.8 Applicants should consider the noise impact of ancillary activities associated with the development, such as increased road and rail traffic movements, or other forms of transportation.	5.12.8 Applicants should consider the noise impact of ancillary activities associated with the development, such as increased road and rail traffic movements, or other forms of transportation.	**ES Chapter 10: Noise and Vibration [APP/6.2]** considers the noise impact of ancillary activities associated with the development, such as increased road and rail traffic movements, or other forms of transportation. It concludes that with the implementation of mitigation measures, significant adverse noise and vibration effects during the construction, operation and decommissioning of the Scheme will be avoided at sensitive receptors. The embedded and additional mitigation measures are documented within the: **oCEMP [APP/7.6], oCTMP [APP/7.7], oOEMP [APP/7.8], oOTMP [APP/7.9]** and **oDS [APP/7.10]** and are secured via requirements of the **draft DCO [APP/3.1]**.
	5.12.9 Operational noise, with respect to human receptors, should be assessed using the principles of the relevant British Standards and other guidance. Further information on assessment of particular noise sources may be contained in the technology specific NPSs. In	5.12.9 Operational noise, with respect to human receptors, should be assessed using the principles of the relevant British Standards and other guidance. Further information on assessment of particular noise sources may be contained in the	**ES Chapter 10: Noise and Vibration [APP/6.2]** assesses operational noise at the identified sensitive noise receptors following BS 4142 guidance, BS 8233:2014 and World Health Organisation guidance. Construction and decommissioning noise and vibration impacts have been assessed per Annex E of British Standards 5228-1.

	particular, for renewables (EN-3) and electricity networks (EN-5) there is assessment guidance for specific features of those technologies. For the prediction, assessment and management of construction noise, reference should be made to any relevant British Standards and other guidance which also give examples of mitigation strategies.	technology specific NPSs. In particular, for renewables (EN-3) and electricity networks (EN-5) there is assessment guidance for specific features of those technologies. For the prediction, assessment and management of construction noise, reference should be made to any relevant British Standards and other guidance which also give examples of mitigation strategies.	
	5.12.10 Some noise impacts will be controlled through environmental permits and parallel tracking is encouraged where noise impacts determined by an environmental permit interface with planning issues (i.e. physical design and location of development). The applicant should consult the EA and/or the SNCB, and other relevant bodies, such the MMO or NRW, as necessary, and in particular regarding assessment of noise on protected species or other wildlife. The results of any noise surveys and predictions may inform the ecological assessment. The seasonality of potentially affected species in nearby sites may also need to be considered.	5.12.10 Some noise impacts will be controlled through environmental permits and parallel tracking is encouraged where noise impacts determined by an environmental permit interface with planning issues (i.e. physical design and location of development). The applicant should consult the EA and/or the SNCB, and other relevant bodies, such the MMO or NRW, as necessary, and in particular regarding assessment of noise on protected species or other wildlife. The results of any noise surveys and predictions may inform the ecological assessment. The seasonality of potentially affected species in nearby sites may also need to be considered.	The **Consents and Agreements Position Statement [APP/7.5]** has been prepared as part of this 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 **draft DCO [APP/3.1].** The **Consultation Report [APP/5.1]** states that Natural England did not comment on noise during the consultation. A summary of engagement with Breckland Council is provided in Section 10.2 of **ES Chapter 10: Noise and Vibration [APP/6.2].**
	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.	5.12.12 Applicants should submit a detailed impact assessment and mitigation plan as part of any development plan, including the use of noise mitigation and noise abatement technologies during construction and operation.	**ES Chapter 10: Noise and Vibration [APP/6.2]** presents a noise assessment in accordance with the requirements of this policy, including a description of the noise generating aspects of the development. **ES Chapter 10: Noise and Vibration [APP/6.2]** considers the noise effects of the Scheme. It concludes that with the implementation of embedded and additional mitigation measures, significant residual adverse noise and vibration effects during the construction, operation and decommissioning of the Scheme will be avoided at sensitive receptors. The embedded and additional mitigation measures are documented within the: **oCEMP [APP/7.6], oCTMP [APP/7.7], oOEMP [APP/7.8], oOTMP [APP/7.9]** and **oDS [APP/7.10]** and are secured via requirements of the **draft DCO [APP/3.1]**. Residual noise and vibration effects from construction, operational and decommissioning activities on highly sensitive residential receptors would reduce to a low or negligible magnitude of impact in all cases, which is associated with short-term Minor Adverse effects at most, which is not significant in EIA terms. Section 10.11 of **ES Chapter 10: Noise and Vibration [APP/6.2]** presents an assessment of cumulative effects between the Scheme and other existing and/or approved developments on noise and vibration. The cumulative effect assessment finds that the Scheme, cumulatively with the High Grove Solar, would result in a significant adverse effect at the 'The Off Barn' high-sensitive receptor. However, the cumulative effects assessment concludes that it is likely that noise levels can be controlled through the implementation of additional mitigation measures to suitable levels at 'The Off Barn' receptor when considered cumulatively with the neighbouring

			High Grove Solar Farm, such that residual levels would represent at most a minor impact, which is considered not significant, in EIA terms. In accordance with NPS EN-1 paragraph 5.12.12, mitigation has been incorporated to minimise potential adverse effects on health and quality of life. Mitigation measures are summarised in Section 10.7 of **ES Chapter 10: Noise and Vibration [APP/6.2]**.
Mitigation	5.12.13 The Secretary of State should consider whether mitigation measures are needed both for operational and construction noise over and above any which may form part of the project application. In doing so the Secretary of State may wish to impose mitigation measures. Any such mitigation measures should take account of the NPPF or any successor to it and the Planning Practice Guidance on Noise.	5.12.13 The Secretary of State should consider whether mitigation measures are needed both for operational and construction noise over and above any which may form part of the project application. In doing so the Secretary of State may wish to impose mitigation measures. Any such mitigation measures should take account of the NPPF or any successor to it and the Planning Practice Guidance on Noise.	**ES Chapter 10: Noise and Vibration [APP/6.2]** considers the noise effects of the Scheme. It concludes that with the implementation of embedded and additional mitigation measures, significant residual adverse noise and vibration effects during the construction, operation and decommissioning of the Scheme will be avoided at sensitive receptors. The embedded and additional mitigation measures are documented within the: **oCEMP [APP/7.6], oCTMP [APP/7.7], oOEMP [APP/7.8], oOTMP [APP/7.11]** and **oDS [APP/7.10]** and are secured via requirements of the **draft DCO [APP/3.1]**. Residual noise and vibration effects from construction, operational and decommissioning activities on highly sensitive residential receptors would reduce to a low or negligible magnitude of impact in all cases, which is associated with short-term Minor Adverse effects at most, which is not significant in EIA terms. These mitigation measures have been taken into account in accordance with the NPPF and the Planning Practice Guidance on Noise.
	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.	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.	
	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	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	In compliance with Paragraph 5.12.15 of NPS EN-1, the Scheme has sought to design in the quietest and most acceptable cost-effective plant. For example, **ES Chapter 5: The Scheme [APP/6.1]** confirms that the earth that is removed to enable the construction of the Customer Substation and National Grid Substation will be placed into a bund alongside the BESS Compound to create a noise buffer.

	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).	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).	Embedded mitigation measures incorporate an acoustic barrier of 3.5m height is proposed along the western boundaries of Field 27 and partially along the western side of Field 24, between the Battery Energy Storage System Compound and the PRoW, as secured by the **oOEMP [APP/7.8]**.
	5.12.16 A development must be undertaken in accordance with statutory requirements for noise. Due regard must be given to the relevant sections of the Noise Policy Statement for England, the NPPF, and the government's associated planning guidance on noise. In Wales the relevant policy will be PPW and the TANs, as well as the Welsh Government's Noise and Soundscape Action Plan	5.12.16 A development must be undertaken in accordance with statutory requirements for noise. Due regard must be given to the relevant sections of the Noise Policy Statement for England, the NPPF, and the government's associated planning guidance on noise. In Wales the relevant policy will be PPW and the TANs, as well as the Welsh Government's Noise and Soundscape Action Plan	**ES Chapter 10: Noise and Vibration [APP/6.2]** considers relevant sections of the Noise Policy Statement, the NPPF, and the government's associated planning guidance on noise, within its assessment.
Secretary of State decision making	5.12.17 The Secretary of State should not grant development consent unless they are satisfied that the proposals will meet the following aims, through the effective management and control of noise: • avoid significant adverse impacts on health and quality of life from noise • mitigate and minimise other adverse impacts on health and quality of life from noise • where possible, contribute to improvements to health and quality of life through the effective management and control of noise.	5.12.17 The Secretary of State should not grant development consent unless they are satisfied that the proposals will meet the following aims, through the effective management and control of noise: • avoid significant adverse impacts on health and quality of life from noise • mitigate and minimise other adverse impacts on health and quality of life from noise • where possible, contribute to improvements to health and quality of life through the effective management and control of noise.	**ES Chapter 10: Noise and Vibration [APP/6.2]** presents a noise assessment in accordance with the requirements of this policy, including a description of the noise generating aspects of the development. **ES Chapter 10: Noise and Vibration [APP/6.2]** outlines that there are no significant residual effects associated with construction noise or construction traffic and operation, including maintenance. Therefore, there will be no significant effects on human receptors as a result of noise and vibration.
	5.12.18 When preparing the Development Consent Order, the Secretary of State should consider including measurable requirements or specifying the mitigation measures to be put in place to ensure that noise levels do not exceed any limits specified in the development consent. These requirements or mitigation measures may apply to the construction, operation, and decommissioning of the energy infrastructure development.	5.12.18 When preparing the Development Consent Order, the Secretary of State should consider including measurable requirements or specifying the mitigation measures to be put in place to ensure that noise levels do not exceed any limits specified in the development consent. These requirements or mitigation measures may apply to the construction, operation, and decommissioning of the energy infrastructure development.	**ES Chapter 10: Noise and Vibration [APP/6.2]** considers the noise effects of the Scheme. It concludes that with the implementation of embedded and additional mitigation measures, significant residual adverse noise and vibration effects during the construction, operation and decommissioning of the Scheme will be avoided at sensitive receptors. The embedded and additional mitigation measures are documented within the **oCEMP [APP/7.6], oCTMP [APP/7.7], oOEMP [APP/7.8], oOTMP [APP/7.9]** and **oDS [APP/7.10]** and are secured via requirements of the **draft DCO [APP/3.1]**. Residual noise and vibration effects arising from construction, operational, and decommissioning activities are predicted to reduce to a low or negligible magnitude at all highly sensitive residential receptors. These effects would, at most, result in short-term Minor Adverse impacts, which are not considered significant in EIA terms. Section 10.9 of **ES Chapter 10: Noise and Vibration [APP/6.2]** outlines the additional mitigation measures of the Scheme related to noise and vibration. The

			additional mitigation measures are documented within the **oCEMP [APP/7.6]** and secured via requirement of the **draft DCO [APP/3.1].** **ES Chapter 10: Noise and Vibration [APP/6.2]** concludes that, by adopting the embedded and additional mitigation measures, it is considered that noise levels from all construction activities would not exceed the daytime threshold criterion of 65 dB LAeq,T at any of the receptors considered. The predicted operational phase noise levels throughout daytime and night-time periods would not exceed 35 dB LAr,T at any receptors. Section 10.11 of **ES Chapter 10: Noise and Vibration [APP/6.2]** presents an assessment of cumulative effects between the Scheme and other existing and/or approved developments on noise and vibration. The cumulative effect assessment finds that the Scheme, cumulatively with the High Grove Solar, would result in a significant adverse effect at the 'The Off Barn' high-sensitive receptor. However, the cumulative effects assessment concludes that it is likely that noise levels can be controlled through the implementation of additional mitigation measures to suitable levels at 'The Off Barn' receptor when considered cumulatively with the neighbouring High Grove Solar Farm, such that residual levels would represent at most a minor impact, which is considered not significant, in EIA terms.
Part 5.13 - Socio- economic ***Applicant Assessment***	5.13.2 Where the project is likely to have socio-economic impacts at local or regional levels, the applicant should undertake and include in their application an assessment of these impacts as part of the ES (see Section 4.3).	5.13.2 Where the project is likely to have socio-economic impacts at local or regional levels, the applicant should undertake and include in their application an assessment of these impacts as part of the ES (see Section 4.3).	**ES Chapter 14: Socio-Economics [APP/6.2]** describes the existing levels and assesses the anticipated socio-economic effects of the Scheme's construction, operational, and decommissioning in accordance with this policy.
	5.13.3 The applicant is strongly encouraged to engage with relevant local authorities during early stages of project development so that the applicant can gain a better understanding of local or regional issues and opportunities.	5.13.3 The applicant is strongly encouraged to engage with relevant local authorities during early stages of project development so that the applicant can gain a better understanding of local or regional issues and opportunities.	The Applicant has had ongoing engagement with Breckland Council and Norfolk County Council on population matters to better understand the socio-economic fabric of the area and to agree the scope of the assessment, as set out in Section 14.2 of **ES Chapter 14: Socio-Economics [APP/6.2].** Details on the feedback received from the statutory consultation, including the response to each matter raised and how it has been addressed, are provided in the **Consultation Report Appendices [APP/5.2].**
	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	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,	**ES Chapter 14: Socio-Economics [APP/6.2]** describes the existing levels and assesses the anticipated socio-economic effects of the Scheme's construction, operational, and decommissioning, in accordance with this policy. Section 14.11 of **ES Chapter 14: Socio-Economics [APP/6.2]** describes the existing levels and assesses the anticipated cumulative socio-economic effects of the Scheme's construction, operational, and decommissioning, in accordance with this policy. In order to assess the likely effects, **ES Chapter 14: Socio-Economics [APP/6.2]** provides an estimate of the likely employment generation for each phase of the Scheme. During construction, considering both the direct and indirect jobs, the Scheme is expected to support 1,145 net additional jobs, with between 285 and 575 of these being held by Local Catchment Area residents. During the Operational Phase of the Scheme, there will also be periods of maintenance requiring temporary workers. During this replacement period, an estimated gross 125 FTE jobs per annum would be supported, with the on-site workforce expected to peak at around

	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	including the provision of educational and visitor facilities • the impact of a changing influx of workers during the different construction, operation and decommissioning phases of the energy infrastructure. This could change the local population dynamics and could alter the demand for services and facilities in the settlements nearest to the construction work (including community facilities and physical infrastructure such as energy, water, transport and waste). There could also be effects on social cohesion depending on how populations and service provision change as a result of the development • cumulative effects - if development consent were to be granted for a number of projects 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	360 workers at any one time. The Decommissioning Phase is expected to start in 2093 and is assumed to support a lower number of direct, indirect, induced and local jobs than the Construction Phase. For the purposes of the assessment, it is assumed that a workforce the size of approximately 50%-80% of the construction workforce would be required for the Decommissioning Phase. Section 14.11 of **ES Chapter 14: Socio-Economics [APP/6.2]** describes the existing levels and assesses the anticipated cumulative socio-economic effects of the Scheme's construction, operational, and decommissioning, in accordance with this policy. Section 14.11 concludes that there will be a major beneficial cumulative effect on the provision of education, skills, training and supply chain as a result of the Scheme's, High Grove Solar's and East Pye Solar's construction, operational and decommissioning phases.
	5.13.5 Applicants should describe the existing socio-economic conditions in the areas surrounding the proposed development and should also refer to how the development's socio-economic impacts correlate with local planning policies.	5.13.5 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.	Section 14.6 of **ES Chapter 14: Socio-Economics [APP/6.2]** describes the baseline socio-economic conditions within the relevant Study Areas. The Scheme's compliance with local policies is considered in Tables 5 and 6 of the **Policy Compliance Document [APP/5.6].**
	5.13.6 Socio-economic impacts may be linked to other impacts, for example visual impacts considered in Section 5.10 but may also have an impact on tourism and local businesses. Applicants are encouraged, where possible, to demonstrate that local suppliers have been considered in any supply chain.	5.13.6 Socio-economic impacts may be linked to other impacts, for example visual impacts considered in Section 5.10 but may also have an impact on tourism and local businesses. Applicants are encouraged, where possible, to demonstrate that local suppliers have been considered in any supply chain.	The **outline Employment, Skills and Supply Chain Strategy [APP/7.15]** sets out the Applicant's plan to actively promote work opportunities for businesses in order to deliver local benefits. The Scheme will support a range of supply chain opportunities to local businesses. It is expected that the Scheme will utilise the local supply chain to source materials and components, foster partnerships among suppliers, manufacturers, and distributors, and, as such, stimulate economic activity within the Labour Catchment Area.
	5.13.7 Applicants should consider developing accommodation strategies where appropriate, especially during construction and decommissioning phases, that would include the need to provide temporary accommodation for construction workers if required.	5.13.7 Applicants should consider developing accommodation strategies where appropriate, especially during construction and decommissioning phases, that would include the need to provide temporary accommodation for construction workers if required.	Analysis of the temporary accommodation stock in the Labour Catchment Area and within Breckland and King's Lynn has been undertaken to assess the likely available capacity in terms of number of bedrooms, against potential demand from the construction workforce in Tables 14.8 and 14.9, respectively, of **ES Chapter 14: Socio-Economics [APP/6.2].** The chapter assesses the Scheme's impact on occupancy rates as a result of increased visitor numbers to the area. **ES Chapter 14: Socio-Economics [APP/6.2]** concludes that the Scheme is not anticipated to result in any residual adverse effects on socio-economic receptors across the Scheme's construction, operational and decommissioning phases. There is a significant beneficial effect anticipated on the provision of education, skills,

			training and supply chain as a result of the Scheme's construction, operational and decommissioning phases, independently, as well as cumulative.
Mitigation	5.13.8 The Secretary of State should consider whether mitigation measures are necessary to mitigate any adverse socio-economic impacts of the development. For example, high quality design can improve the visual and environmental experience for visitors and the local community alike.	5.13.8 The Secretary of State should consider whether mitigation measures are necessary to mitigate any adverse socio-economic impacts of the development. For example, high quality design can improve the visual and environmental experience for visitors and the local community alike.	**ES Chapter 14: Socio-Economics [APP/6.2]** concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse socio-economic related effects expected across the Scheme's construction, operational and decommissioning phases. There is a significant beneficial effect anticipated on the provision of education, skills, training and supply chain as a result of the Scheme's construction, operational and decommissioning phases. The residual effects outlined in the **ES Chapter 14: Socio-Economics [APP/6.2]** rely on controls established within the **oCEMP [APP/7.6], oESSCS [APP/7.15], oOEMP [APP/7.8]** and the **oDS [APP/7.10]** and which are all secured via requirements under Schedule 2 of the **draft DCO [APP/3.1].** Section 14.11 of **ES Chapter 14: Socio-Economics [APP/6.2]** describes the existing levels and assesses the anticipated cumulative socio-economic effects of the Scheme's construction, operational, and decommissioning, in accordance with this policy. Section 14.11 concludes that there will be a major beneficial cumulative effect on the provision of education, skills, training and supply chain as a result of the Scheme's, High Grove Solar's and East Pye Solar Farm's construction, operational and decommissioning phases.
Secretary of State decision making	5.13.9 The Secretary of State should have regard to the potential socio-economic impacts of new energy infrastructure identified by the applicant and from any other sources that the Secretary of State considers to be both relevant and important to its decision.	5.13.9 The Secretary of State should have regard to the potential socio-economic impacts of new energy infrastructure identified by the applicant and from any other sources that the Secretary of State considers to be both relevant and important to its decision.	**ES Chapter 14: Socio-Economics [APP/6.2]** describes the existing levels and assesses the anticipated socio-economic effects of the Scheme's construction, operational, and decommissioning, in accordance with this policy. **ES Chapter 14: Socio-Economics [APP/6.2]** concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse socio-economic related effects expected across the Scheme's construction, operational and decommissioning phases. There is a significant beneficial effect anticipated on the provision of education, skills, training and supply chain as a result of the Scheme's construction, operational and decommissioning phases. The residual effects outlined in the **ES Chapter 14: Socio-Economics [APP/6.2]** rely on controls established within the **oCEMP [APP/7.6], oESSCS [APP/7.15], oOEMP [APP/7.8]** and the **oDS [APP/7.10]** and are secured via requirements in the **draft DCO [APP/3.1].** Section 14.11 of **ES Chapter 14: Socio-Economics [APP/6.2]** describes the existing levels and assesses the anticipated cumulative socio-economic effects of the Scheme's construction, operational, and decommissioning, in accordance with this policy. Section 14.11 concludes that there will be a major beneficial cumulative effect on the provision of education, skills, training and supply chain as a result of the Scheme's, High Grove Solar's and East Pye Solar Farm's construction, operational and decommissioning phases.
	5.13.10 The Secretary of State may conclude that limited weight is to be given to assertions of socio-economic impacts that are not supported by evidence (particularly in view of the need for energy infrastructure as set out in this NPS).	5.13.10 The Secretary of State may conclude that limited weight is to be given to assertions of socio-economic impacts that are not supported by evidence (particularly in view of the need for energy infrastructure as set out in this NPS).	
	5.13.11 The Secretary of State should consider any relevant positive provisions the applicant has made or is proposing to make to mitigate impacts (for example through planning obligations) and any legacy benefits that may	5.13.11 The Secretary of State should consider any relevant positive provisions the applicant has made or is proposing to make to mitigate impacts (for example through planning obligations) and any	**ES Chapter 14: Socio-Economics [APP/6.2]** concludes that with embedded and additional mitigation measures in place, there is a significant beneficial effect anticipated on the provision of education, skills, training and supply chain as a result of the Scheme's construction, operational and decommissioning phases.

	arise as well as any options for phasing development in relation to the socio-economic impacts.	legacy benefits that may arise as well as any options for phasing development in relation to the socio-economic impacts.	Section 5.3 of the **Planning Statement [APP/5.5]** sets out the benefits of the Scheme. The **oESSCS [APP/7.15]** sets out that the Applicant has engaged with external stakeholders to help identify key challenges in the local labour market and highlight opportunities for maximising socio-economic benefits. Continuing to work with them will ensure that the final ESSCS is grounded in local priorities, coordinated with existing initiatives, and effective in delivering lasting benefits.
	5.13.12 The Secretary of State may wish to include a requirement that specifies the approval by the local authority of an employment and skills plan detailing arrangements to promote local employment and skills development opportunities, including apprenticeships, education, engagement with local schools and colleges and training programmes to be enacted.	5.13.12 The Secretary of State may wish to include a requirement that specifies the approval by the local authority of an employment and skills plan detailing arrangements to promote local employment and skills development opportunities, including apprenticeships, education, engagement with local schools and colleges and training programmes to be enacted.	
Part 5.14 - Traffic and Transport ***Applicant Assessment***	5.14.5 If a project is likely to have significant transport implications, the applicant's ES (see Section 4.3) should include a transport appraisal. The DfT's Transport Analysis Guidance (TAG) and Welsh Governments WelTAG provides guidance on modelling and assessing the impacts of transport schemes.	5.14.5 If a project is likely to have significant transport implications, the applicant's ES (see Section 4.3) should include a vision for transport and an assessment of potential transport impacts. The DfT's Transport Analysis Guidance (TAG) and Welsh Governments WelTAG provides guidance on modelling and assessing the impacts of transport schemes.	**ES Appendix 9.2: Traffic Assessment [APP/6.4]** of **ES Chapter 9: Transport and Access [APP/6.2]** has been prepared in accordance with appropriate guidance including the Department for Transport's guidance on Travel Plans, Transport Assessments and Statements in Decision Taking (2014). **ES Chapter 9: Transport and Access [APP/6.2]** concludes that with the embedded mitigation measures in place, there are no residual transport and access-related effects expected across the Scheme's construction, operational and decommissioning phases.
	5.14.6 National Highways and Highways Authorities are statutory consultees on NSIP applications including energy infrastructure where it is expected to affect the strategic road network and / or have an impact on the local road network. Applicants should consult with National Highways and Highways Authorities as appropriate on the assessment and mitigation to inform the application to be submitted.	5.14.7 National Highways and Highways Authorities are statutory consultees on NSIP applications including energy infrastructure where it is expected to affect the strategic road network and / or have an impact on the local road network. Applicants should consult with National Highways and Highways Authorities as appropriate on the assessment, including any reasonable future tested scenarios and mitigation to inform the application to be submitted.	The Applicant has consulted with the relevant highway authorities, including National Highways and Norfolk County Council. Section 9.2 of ES **Chapter 9: Transport and Access [APP/6.2]** sets out the comments from these stakeholders.
	5.14.7 The applicant should prepare a travel plan including demand management and monitoring measures to mitigate transport impacts. The applicant should also provide details of proposed measures to improve access by active, public and shared transport to: • reduce the need for parking associated with the proposal; • contribute to decarbonisation of the transport network; • improve user travel options by offering genuine modal choice.	5.14.8 The applicant should prepare a travel plan adopting a vision-led approach to identify demand management and monitoring and fall-back measures that proactively mitigate transport impacts by providing details of proposed measures to improve access by active, public and shared transport to: • • 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	Section 6.3 of the **oCTMP [APP/7.7]** sets out that a Travel Plan will be developed to manage the arrival and departure profile of staff and to encourage sustainable modes of transport, especially a shuttle bus and car-sharing. A Travel Plan Coordinator (TPC) will be appointed to oversee the implementation of the Travel Plan, whose responsibilities will comprise, but not necessarily be limited to, implementing measures set out in the Travel Plan, raising awareness and promoting the Travel Plan and providing advice to workers regarding sustainable travel options. The following aims of the Travel Plan are set out to improve access by active, public and shared transport: • The promotion of car sharing to reduce single occupancy car journeys • The provision of a shuttle bus to reduce single occupancy car journeys; and • The increase of knowledge on public transport and Active Travel available to workers.

	5.14.8 The assessment should also consider any possible disruption to services and infrastructure (such as road, rail and airports).	5.14.9 The assessment should also consider any possible disruption to services and infrastructure (such as road, rail and airports).	Suggested measures could include: • Establish a car share scheme for workers • Arrange on-site facilities for workers, such as storage lockers for equipment • Provide a map with identified cycling/walking/bus routes to a Site; and • Provide an emergency cycle repair kit at the compounds. Section 6.2 of the **oCTMP [APP/7.7]** sets out the following measures, which seek to reduce the number of trips: • Provision of shuttle buses to transport workers to and from nearby conurbations as well as internally within the Scheme • Establish a car share scheme for workers • Consolidation of deliveries through full and reverse logistics strategies where possible; and • Deliveries will be made, when possible, directly to the primary and secondary construction compounds then transferred by a smaller vehicle to consolidate internal vehicle trips across the Scheme. Section 4 of the **oCTMP [APP/7.7]** sets out the construction vehicle routing, the agreed routing for vehicles is as agreed with NCC and NH. It is proposed that all construction vehicles and HGVs access the Scheme from the A47, which is part of the Strategic Road Network (SRN) to the south, where possible, then travel along the A1065 before entering via the relevant access point onto the A1065. These routes provide the shortest distance between various access points associated with the Scheme and SRN (A47) to prevent travel on unsuitable roads as well as avoid material harm. The **Access and Rights of Way Plan [APP/2.5]** demonstrates that safe access is ensured for pedestrians and cyclists. As set out in the **oPRoWPPMP [APP/7.12],** the alignment of existing PRoW within the Site has been incorporated into the design of the Scheme. As such, the alignment of PRoW will be unaffected by the Scheme during the operation and maintenance phase of the Scheme. The **Design Approach Document [APP/5.7]** sets out Project Principles which have influenced the design evolution to prioritise social value and community benefits. Project Principles 2.9 and 5.10 sets out that the Scheme will consider the experience of people using the PRoW retain all PRoWs on the existing alignment during the operational phase. Within the **oCTMP [APP/7.7],** the Travel Plan sets out the aim for improving knowledge and accessibility to different Active Travel modes, including measures such as the provision of a map with identified cycling, walking and bus routes and cycle repair kits.
	5.14.9 If additional transport infrastructure is needed or proposed, it should always include good quality walking, wheeling and cycle routes, and associated facilities (changing/storage etc.) needed to enhance active transport provision.	5.14.10 If additional transport infrastructure is needed or proposed, it should always include good quality walking, wheeling and cycle routes, and associated facilities (changing/storage etc.) needed to enhance active transport provision.	

Mitigation	5.14.11 Where mitigation is needed, possible demand management measures must be considered. This could include identifying opportunities to: • reduce the need to travel by consolidating trips; • locate development in areas already accessible by active travel and public transport; • provide opportunities for shared mobility; • re-mode by shifting travel to a sustainable mode that is more beneficial to the network; • retime travel outside of the known peak times; • reroute to use parts of the network that are less busy.	5.14.12 Where mitigation is needed, possible demand management measures must be considered. This could include identifying opportunities to: • reduce the need to travel by consolidating trips • reduce the need to travel by consolidating trips; • locate development in areas already accessible by active travel and public transport; • provide opportunities for shared mobility; • re-mode by shifting travel to a sustainable mode that is more beneficial to the network; • retime travel outside of the known peak times; and • reroute to use parts of the network that are less busy.	Section 6.3 of the **oCTMP [APP/7.7]** sets out that a Travel Plan will be developed, to manage the arrival and departure profile of staff and to encourage sustainable modes of transport, especially a shuttle bus and car-sharing. A Travel Plan Coordinator (TPC) will be appointed to oversee the implementation of the Travel Plan, whose responsibilities will comprise, but not necessarily be limited to, implementing measures set out in the Travel Plan, raising awareness and promoting the Travel Plan and providing advice to workers regarding sustainable travel options. The expected trip generation from this Scheme is set out in Section 9.4 of **ES Chapter 9: Transport and Access [APP/6.2]**. Section 5.5 of the **oCTMP [APP/7.7]** sets out the Delivery Management mitigation measures. Construction vehicles will avoid travel during the morning and evening peak hours of the network, where possible. Therefore, deliveries will be arranged to occur after 09:00 and before 17:00. Section 4 of the **oCTMP [APP/7.7]** sets out the construction vehicle routing, the agreed routing for vehicles is as agreed with NCC and NH. It is proposed that all construction vehicles and HGVs access the Scheme from the A47, which is part of the Strategic Road Network (SRN) to the south, where possible, then travel along the A1065 before entering via the relevant access point onto the A1065. These routes provide the shortest distance between various access points associated within the Scheme and SRN (A47) to prevent travel on unsuitable roads as well as avoiding material harm. Trips largely occur outside of peak network hours, as mentioned above. Support and encouragement for model shift of freight is noted in the Travel Plan included within the **oCTMP [APP/7.7]**. The Travel Plan highlights mitigation such as the use of a shuttle bus service to reduce the environmental impact of staff trips by reducing the use of private cars.
	5.14.12 If feasible and operationally reasonable, such mitigation should be required, before considering requirements for the provision of new inland transport infrastructure to deal with remaining transport impacts. All stages of the project should support and encourage a modal shift of freight from road to more environmentally sustainable alternatives, such as rail, cargo bike, maritime and inland waterways, as well as making appropriate provision for and infrastructure needed to support the use of alternative fuels including charging for electric vehicles.	5.14.14 If feasible and operationally reasonable, such mitigation should be required, before considering requirements for the provision of new inland transport infrastructure to deal with remaining transport impacts. All stages of the project should support and prioritise a modal shift of freight from road to more environmentally sustainable alternatives, such as rail, cargo bike, maritime and inland waterways, as well as making appropriate provision for and infrastructure needed to support the use of alternative fuels including charging for electric vehicles.	
	5.14.13 Regard should always be given to the needs of freight at all stages in the construction and operation of the development including the need to provide appropriate facilities for HGV drivers as appropriate.	5.14.15 Regard should always be given to the needs of freight at all stages in the construction and operation of the development including the need to provide appropriate facilities for HGV drivers as appropriate.	The needs of freight at all stages are covered within the **oCTMP [APP/7.7]**, the **oOTMP [APP/7.9]**, and the **oDS [APP/7.10]**. Mitigation measures, including delivery management, wheel washing, vehicle tracking and identification, and the requirement of accreditation, are included where relevant throughout each phase of the Scheme to ensure the safe and effective movement of HGVs and the provision of facilities for the drivers. The expected trip generation from this Scheme is set out in Section 9.4 of **ES Chapter 9: Transport and Access [APP/6.2]**. Section 5.5 of the **oCTMP [APP/7.7]** sets out the Delivery Management mitigation measures. Construction vehicles will avoid travel during the morning and evening network peak hours, where possible. Therefore, deliveries will be arranged to occur after 09:00 and before 17:00. Within the **oCTMP [APP/7.7]**, the **oOTMP [APP/7.9]**, and the **oDS [APP/7.10]** the Applicant has included mitigation measures such as signage to avoid on-street
	5.14.14 The Secretary of State may attach requirements to a consent where there is likely to be substantial HGV traffic that: • control numbers of HGV movements to and from the site in a specified period during its	5.14.16 The Secretary of State may attach requirements to a consent where there is likely to be substantial HGV traffic that: • control numbers of HGV movements to and from the site in a specified period	

	construction and possibly on the routing of such movements; • make sufficient provision for HGV parking, and associated high quality drive facilities either on the site or at dedicated facilities elsewhere, to support driver welfare, avoid 'overspill' parking on public roads, prolonged queuing on approach roads and uncontrolled on-street HGV parking in normal operating conditions; • ensure satisfactory arrangements for reasonably foreseeable abnormal disruption, in consultation with network providers and the responsible police force.	during its construction and possibly on the routing of such movements; • make sufficient provision for HGV parking, and associated high quality drive facilities either on the site or at dedicated facilities elsewhere, to support driver welfare, avoid 'overspill' parking on public roads, prolonged queuing on approach roads and uncontrolled on-street HGV parking in normal operating conditions; • ensure satisfactory arrangements for reasonably foreseeable abnormal disruption, in consultation with network providers and the responsible police force.	parking, as well as sufficient parking within the Scheme to avoid an overspill. Welfare facilities will also be provided to all site staff as highlighted by Section 2 of the **oCTMP [APP/7.7].** Sections 5.5 and 5.4 of the **oCTMP [APP/7.7]** and the **oOTMP [APP/7.9],** respectively**,** set out the delivery management for the Scheme which will ensure the safe manoeuvring of HGVs from the public highway or PRoW. Drivers will be allocated a time slot and instructed upon the relevant access point and route to take as secured in the **oCTMP [APP/7.7]** and the **oOTMP [APP/7.9],** for construction and operation phases, respectively. This will help avoid prolonged queuing and uncontrolled on-street parking. Sections 7 of the **oCTMP [APP/7.7]** and the **oOTMP [APP/7.9]** outline how AILs will be managed to avoid disruption to the network. The key management method will be the use of the Electronic Service Delivery for Abnormal Loads (ESDAL2) system, and if not used then an application will be submitted to allow adequate time for consultation, planning and further notification.
	5.14.15 The Secretary of State should have regard to the cost-effectiveness of demand management measures compared to new transport infrastructure, as well as the aim to secure more sustainable patterns of transport development when considering mitigation measures.	5.14.17 The Secretary of State should have regard to the cost-effectiveness of demand management measures compared to new transport infrastructure, as well as the aim to secure more sustainable patterns of transport development when considering mitigation measures.	**ES Chapter 9: Transport and Access [APP/6.2]** describes the existing levels and provides an assessment of the anticipated transport and access effects of the Scheme's construction, operational, and decommissioning phases in accordance with this policy. **ES Chapter 9: Transport and Access [APP/6.2]** aims to secure more sustainable patterns of transport through mitigation measures which are included within the **oCEMP [APP/7.6]**, **oCTMP [APP/7.7]**, **oOEMP [APP/7.8]**, **oOTMP [APP/7.9]**, **oDS [APP/7.10],** and **oPRoWPPMP [APP/7.12]** and are secured via requirements of the **draft DCO [APP/3.1].** The Applicant has provided an **oPRoWPPMP [APP/7.12]** which aims is to ensure that PRoW remain accessible and safe at all times throughout the construction, operation and maintenance, and decommissioning phases. The **oPRoWPPMP [APP/7.12]** sets out that the Applicant has proposed approximately 3785 linear metres of permissive path within the Order limits and approximately 1203 linear metres of permissive paths outside of the Order limits. These permissive paths aim to promote walking and cycling by improving links to existing routes.
Secretary of State decision making	5.14.18 A new energy NSIP may give rise to substantial impacts on the surrounding transport infrastructure and the Secretary of State should therefore ensure that the applicant has sought to mitigate these impacts, including during the construction phase of the development and by enhancing active, public and shared transport provision and accessibility.	5.14.20 A new energy NSIP may give rise to substantial impacts on the surrounding transport infrastructure and the Secretary of State should therefore ensure that the applicant has sought to mitigate these impacts, including during the construction phase of the development and by enhancing active, public and shared transport provision and accessibility.	**ES Chapter 9: Transport and Access [APP/6.2]** concludes that with the mitigation measures from the **oCEMP [APP/7.6]**, **oCTMP [APP/7.7], oOEMP [APP/7.8],oOTMP [APP/7.9], oDS [APP/7.10],** and **oPRoWPPMP [APP/7.12]** in place, there are no residual transport and access-related effects expected across the Scheme's construction, operational and decommissioning phases. A number of embedded mitigation measures are outlined in the **oCTMP [APP/7.7]** for controlling the vehicles associated with the construction phase. This includes the following: • Delivery management • Wheel washing • Vehicle tracking and identification; and • The requirement of accreditation. As highlighted in Section 9.10 of **ES Chapter 9: Transport and Access [APP/6.2],** there are no residual effects identified for this Scheme**.**
	5.14.20 Development consent should not be withheld provided that the applicant is willing to enter into planning obligations for funding new infrastructure or requirements can be imposed to mitigate transport impacts. In this situation the Secretary of State should apply appropriately	5.14.22 Development consent should not be withheld provided that the applicant is willing to enter into planning obligations for funding new infrastructure or requirements can be imposed to mitigate transport impacts. In this situation the Secretary of State should apply appropriately limited	

	limited weight to residual effects on the surrounding transport infrastructure.	weight to residual effects on the surrounding transport infrastructure.	The **Access and Rights of Way Plan [APP/2.5]** and the **oPRoWPPMP [APP/7.12]** outline new permissive paths and site access points that facilitate active transport by enhancing the accessibility and quality of the access options available to visitors.
	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.	5.14.23 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.	
Part 5.15 – Resource and Waste Management ***Applicant Assessment***	5.15.6 Applicants must demonstrate that development proposals are in line with Defra's policy position on the role of energy from waste in treating residual waste.	5.15.6 Applicants must ensure that all proposals align with circular economy objectives. In England, applicants must demonstrate that development proposals are in line with Defra's policy statement on the role of EfW in treating residual waste	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 in the collection, separation, sorting, recycling, and recovery of waste arising from the development during its use. Waste is considered in Section 16.9 of **ES Chapter 16: Other Environmental Matters [APP/6.2]** and gives consideration to The Waste Prevention Programme for England: Maximising Resources, Minimising Waste 2023 and The Environment Act 2021, both of which promote a circular economy. The construction of the Scheme will be subject to measures and procedures defined within a detailed CEMP and Site Waste Management Plan (SWMP). These measures will include the implementation of industry standard practice and control measures for material and waste management on-site. These measures are set out in the **oCEMP [APP/7.6]** submitted with the DCO Application. As set out in the **oCEMP [APP/7.6],** to minimise impacts of waste on the surrounding environment, the following measures would be implemented: • Damping down of surfaces during spells of dry weather and brushing/water spraying of heavily used hard surfaces/access points across the site as required • Burning of waste or unwanted materials will not be permitted on-site • All hazardous materials including fuels, chemicals, cleaning agents, solvents and solvent containing products to be properly sealed in containers at the end of each day prior to storage in appropriately protected and bunded storage areas • All construction workers will be required to use appropriate personal protective equipment whilst performing activities on-site • Any waste effluent will be tested and, where necessary, disposed of at a correctly licenced facility by a licenced specialist contractor/s; and • Materials requiring removal from the site will be transported using licenced carriers and records will be kept detailing the types and quantities of waste moved, and the destinations of this waste, in accordance with the relevant regulations.
	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.	5.15.7 The applicant should set out the arrangements that are proposed for managing any waste produced and prepare a report that sets out the sustainable management of waste and use of resources throughout any relevant demolition, excavation and construction activities.	
	5.15.9 The arrangements described and a report setting out the sustainable management of waste and use of resources should include information on how re-use and recycling will be maximised in addition to the proposed waste recovery and disposal system for all waste generated by the development. They should also include an assessment of the impact of the waste arising from development on the capacity of waste management facilities to deal with other waste arising in the area for at least five years of operation.	5.15.8 The arrangements described and a report setting out the sustainable management of waste and use of resources should include information on how re-use and recycling will be maximised in addition to the proposed waste recovery and disposal system for all waste generated by the development. They should also include an assessment of the impact of the waste arising from development on the capacity of waste management facilities to deal with other waste arising in the area for at least five years of operation.	
	5.15.10 The applicant is encouraged to refer to the Waste Prevention Programme for England: Maximising Resources Minimising Waste and 'Towards Zero Waste: Our Waste Strategy for Wales' and should seek to minimise the volume of waste produced and the volume of waste sent for disposal unless it can be demonstrated that this is the best overall environmental outcome.	5.15.9 The applicant must consider the Circular Economy and how to ensure that their project aligns with the government's circular economy ambitions. In Wales applicants are encouraged to refer to 'Towards Zero Waste: Our Waste Strategy for Wales.	

	5.15.12 The UK is committed to moving towards a more 'circular economy'. Where possible, applicants are encouraged to source materials from recycled or reused sources and use low carbon materials, sustainable sources and local suppliers. Construction best practices should be used to ensure that material is reused or recycled onsite where possible.	5.15.11 The UK is committed to transitioning to a circular economy, a future where resources are kept in use for longer, and waste is reduced; we accelerate the path to net zero, we see investment in critical infrastructure and green jobs, our economy prospers, and nature thrives. Where possible, applicants are encouraged to source materials from recycled or reused sources and use low carbon materials, sustainable sources and local suppliers. Construction best practices should be used to ensure that material is reused or recycled onsite where possible.	
	5.15.13 Applicants are also encouraged to use construction best practices in relation to storing materials in an adequate and protected place on site to prevent waste, for example, from damage or vandalism. The use of Building Information Management tools (or similar) to record the materials used in construction can help to reduce waste in future decommissioning of facilities, by identifying materials that can be recycled or reused.	5.15.12 Applicants are also encouraged to prepare a materials management plan to inform the use of construction best practices in relation to storing materials in an adequate and protected place on site to prevent waste, or degeneration of valuable materials, for example, from accidental damage or excessive weathering. The use of Building Information Management tools (BIM, or similar) to record the materials used in construction can help to reduce waste and realise further value in future decommissioning of facilities, by identifying materials that can be recycled or reused.	
Secretary of State decision making	5.15.14 The Secretary of State should consider the extent to which the applicant has proposed an effective system for managing hazardous and non-hazardous waste arising from the construction, operation and decommissioning of the proposed development.	5.15.13 The Secretary of State should consider the extent to which the applicant has proposed an effective system for managing hazardous and non-hazardous waste arising from the construction, operation and decommissioning of the proposed development.	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. Waste is considered in Section 16.9 of **ES Chapter 16: Other Environmental Matters [APP/6.2]**. The construction of the Scheme will be subject to measures and procedures defined within a detailed CEMP and Site Waste Management Plan (SWMP). These measures will include the implementation of industry standard practice and control measures for material and waste management on-site. These measures are set out in the **oCEMP [APP/7.6]** submitted with the DCO Application. As set out in the **oCEMP [APP/7.6],** which is secured via requirement of the **draft DCO [APP/3.1]**, to minimise impacts of waste on the surrounding environment, the following measures would be implemented: • Damping down of surfaces during spells of dry weather and brushing/water spraying of heavily used hard surfaces/access points across the site as required • Burning of waste or unwanted materials will not be permitted on-site • All hazardous materials including fuels, chemicals, cleaning agents, solvents and solvent containing products to be properly sealed in containers at the end of each day prior to storage in appropriately protected and bunded storage areas
	5.15.15 The Secretary of State should be satisfied that: • any such waste will be properly managed, both on-site and off-site. • the waste from the proposed facility can be dealt with appropriately by the waste infrastructure which is, or is likely to be, available. Such waste arisings should not have an adverse effect on the capacity of existing waste management facilities to deal with other waste arisings in the area. • adequate steps have been taken to minimise the volume of waste arisings, and of the	5.15.14 The Secretary of State should be satisfied that: • any such waste will be properly managed, both on-site and off-site. • the waste from the proposed facility can be dealt with appropriately by the waste infrastructure which is, or is likely to be, available. Such waste arisings should not have an adverse effect on the capacity of existing waste management facilities to deal with other waste arisings in the area. • adequate steps have been taken to give consideration to the circular economy,	

	volume of waste arisings sent for recovery or disposal, except where that is the best overall environmental outcome.	minimise the volume of waste arisings, and of the volume of waste arisings sent for recovery or disposal, except where that is the best overall environmental outcome.	• All construction workers will be required to use appropriate personal protective equipment whilst performing activities on-site • Any waste effluent will be tested and, where necessary, disposed of at a correctly licenced facility by a licenced specialist contractor/s; and • Materials requiring removal from the site will be transported using licenced carriers and records will be kept detailing the types and quantities of waste moved, and the destinations of this waste, in accordance with the relevant regulations.
	5.15.16 Where necessary, the Secretary of State should use requirements or obligations to ensure that appropriate measures for waste management are applied.	5.15.15 Where necessary, the Secretary of State should use requirements or obligations to ensure that appropriate measures for waste management are applied.	
	5.15.19 The Secretary of State should have regard to any potential impacts on the achievement of resource efficiency and waste reduction targets set under the Environment Act 2021 or wider goals set out in the government's Environmental Improvement Plan 2023.	5.15.18 The Secretary of State should have regard to any potential impacts on the achievement of resource efficiency and waste reduction targets set under the Environment Act 2021 and circular economy objectives.	
Part 5.16 - Water Quality and Resources ***Applicant assessment***	5.16.3 Where the project is likely to have effects on the water environment, the applicant should undertake an assessment of the existing status of, and impacts of the proposed project on, water quality, water resources and physical characteristics of the water environment, and how this might change due to the impact of climate change on rainfall patterns and consequently water availability across the water environment, as part of the ES or equivalent (see Section 4.3 and 4.10).	5.16.3 Where the project is likely to have effects on the water environment, the applicant should undertake an assessment of the existing status of, and impacts of the proposed project on, water quality, water resources and physical characteristics of the water environment, and how this might change due to the impact of climate change on rainfall patterns and consequently water availability across the water environment, as part of the ES or equivalent (see Section 4.3 and 4.10).	**ES Chapter 12: Water Resources [APP/6.2]** describes the existing levels and assesses the anticipated water effects of the Scheme's construction, operational, and decommissioning in accordance with this policy. **ES Chapter 12: Water Resources [APP/6.2]** assess the impacts of the Scheme on water quality, water bodies or protected areas, and concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse water effects expected across the Scheme's construction, operational and decommissioning phases on water quality, water bodies or protected areas.
	5.16.4 The applicant should make early contact with the relevant regulators, including the local authority, the Environment Agency and Marine Management Organisation, where appropriate, for relevant licensing and environmental permitting requirements.	5.16.4 The applicant should make early contact with the relevant regulators, including the local authority, the Environment Agency and Marine Management Organisation, where appropriate, for relevant licensing and environmental permitting requirements.	Section 12.2 of **Chapter 12: Water Resources [APP/6.2]** sets out that the Applicant has been in consultation with Anglia Water, the Environment Agency, the Borough Council of King's Lynn & West Norfolk, and Breckland Council (the Lead Local Flood Authority) in relation to water resources. The Applicant has considered the advice and taken account of the feedback received through consultation. The pre-application consultation undertaken by the Applicant, and how feedback from consultees has informed the Scheme, is reported in the **Consultation Report [APP/5.1]** and its **Consultation Report Appendices [APP/5.2].**
	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.	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.	As set out in the **FRA [APP/6.4],** surface water runoff from the Solar PV will be managed through Rural SuDS and Natural Flood Management techniques such as grassland/wildflower, which will act to bind soils, slow surface water and increase water quality compared to the baseline scenario. The **FRA [APP/6.4]** includes a Surface Water Drainage Strategy, which outlines how surface water runoff from the Site will be managed in accordance with national, regional, and local requirements regarding flood risk and drainage. As the Scheme does not have a detailed layout, a detailed drainage strategy cannot be provided at this stage, with the principles and design criteria presented in this document. These
	5.16.6 Applicants are encouraged to consider protective measures to control the risk of pollution to groundwater beyond those outlined	5.16.6 Applicants should avoid locating potentially polluting activities in the most sensitive locations for groundwater, in	

	in River Basin Management Plans and Groundwater Protection Zones – this could include, for example, the use of protective barriers.	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.	criteria will be applied at the detailed design phase. These measures are set out in the **oCEMP [APP/7.6]** submitted with the DCO Application.
	5.16.7 The ES should in particular describe: • the existing quality of waters affected by the proposed project and the impacts of the proposed project on water quality, noting any relevant existing discharges, proposed new discharges and proposed changes to discharges • existing water resources affected by the proposed project and the impacts of the proposed project on water resources, noting any relevant existing abstraction rates, proposed new abstraction rates and proposed changes to • abstraction rates (including any impact on or use of mains supplies and reference to Abstraction Licensing Strategies) and also demonstrate how proposals minimise the use of water resources and water consumption in the first instance • existing physical characteristics of the water environment (including quantity and dynamics of flow) affected by the proposed project and any impact of physical modifications to these characteristics • any impacts of the proposed project on water bodies or protected areas (including shellfish protected areas) under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 and source protection zones (SPZs) around potable groundwater abstractions • how climate change could impact any of the above in the future • any cumulative effects	5.16.7 The ES should in particular describe: • the existing quality of waters affected by the proposed project and the impacts of the proposed project on water quality, noting any relevant existing discharges, proposed new discharges and proposed changes to discharges • existing water resources affected by the proposed project and the impacts of the proposed project on water resources, noting any relevant existing abstraction rates, proposed new abstraction rates and proposed changes to • abstraction rates (including any impact on or use of mains supplies and reference to Abstraction Licensing Strategies) and also demonstrate how proposals minimise the use of water resources and water consumption in the first instance • existing physical characteristics of the water environment (including quantity and dynamics of flow) affected by the proposed project and any impact of physical modifications to these characteristics • any impacts of the proposed project on water bodies or protected areas (including shellfish protected areas) under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 and source protection zones (SPZs) around potable groundwater abstractions • how climate change could impact any of the above in the future • any cumulative effects	**ES Chapter 12: Water Resources [APP/6.2]** assess the impacts of the Scheme on water quality, water bodies or protected areas, and concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse water effects expected across the Scheme's construction, operational and decommissioning phases on water quality, water bodies or protected areas. The DCO Application is supported by **ES Appendix 12.2: FRA [APP/6.4]** which considers the impacts of the Scheme on drainage. The depth of flooding and reasonable assumptions for the impacts of climate change on flood depths have been assessed as part of a FRA using the data available on flooding. A Surface Water Drainage Strategy (which will form part of a detailed CEMP(s)) will include details of pre-construction, construction, and post-construction water quality monitoring. These measures are set out in the **oCEMP [APP/7.6]** submitted with the DCO Application. **ES Chapter 12: Water Resources [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, the Scheme, together with the cumulative schemes assessed, are not considered to result in significant adverse residual water effects. **ES Appendix 12.3: Water Framework Directive Assessment [APP/6.4]** concludes that the Scheme does not present a risk of deterioration of status of Water Framework Directive waterbodies or jeopardise the attainment of 'good' overall status of Water Framework Directive waterbodies. Section 12.11 of **ES Chapter 12: Water Resources [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, the Scheme, together with High Grove Solar, are not considered to result in significant adverse residual water resources effects.
Mitigation	5.16.8 The Secretary of State should consider whether mitigation measures are needed over and above any which may form part of the	5.16.8 The Secretary of State should consider whether mitigation measures are needed over and above any which may form part of the project application. A	**ES Chapter 12: Water Resources [APP/6.2]** assess the impacts of the Scheme on water quality, water bodies or protected areas, and concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse water effects expected across the Scheme's construction,

	project application. A construction management plan may help codify mitigation at that stage.	construction management plan may help codify mitigation at that stage	operational and decommissioning phases on water quality, water bodies or protected areas. The residual effects outlined in the assessment rely on controls established within the **oCEMP [APP/7.6], oOEMP [APP/7.8],** the **FRA [APP/6.4]** and the **oDS [APP/7.14].** These outline management plans and the Surface Water Drainage Strategy, which is embedded in the **FRA [APP/6.4]** set out the water-related measures to manage any potential water effects that may arise from the Scheme's construction, operational and decommissioning phases. A Surface Water Drainage Strategy (which will form part of a detailed CEMP(s)) will include details of pre-construction, construction, and post-construction water quality monitoring. These measures are set out in the **oCEMP [APP/7.6]** submitted with the DCO Application.
		5.16.9 If insufficient water is available for abstraction, the applicant will need to find alternative sources of water to be able to proceed, whether this is developing their own source or collaborating with the water industry or other water abstractors to develop a joint source.	
	5.16.14 The Secretary of State should be satisfied that a proposal has regard to current River Basin Management Plans and meets the requirements of the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (including regulation 19). The specific objectives for particular river basins are set out in River Basin Management Plans. The Secretary of State must refuse development consent where a project is likely to cause deterioration of a water body or its failure to achieve good status or good potential, unless the requirements set out in Regulation 19 are met. A project may be approved in the absence of a qualifying Overriding Public Interest test only if there is sufficient certainty that it will not cause deterioration or compromise the achievement of good status or good potential.	5.16.15 The Secretary of State should be satisfied that a proposal has regard to current River Basin Management Plans and meets the requirements of the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (including regulation 19). The specific objectives for particular river basins are set out in River Basin Management Plans. The Secretary of State must refuse development consent where a project is likely to cause deterioration of a water body or its failure to achieve good status or good potential, unless the requirements set out in Regulation 19 are met. A project may be approved in the absence of a qualifying Overriding Public Interest test only if there is sufficient certainty that it will not cause deterioration or compromise the achievement of good status or good potential.	**ES Appendix 12.3: Water Framework Directive Assessment [APP/6.4]** concludes that the Scheme does not present a risk of deterioration of status of Water Framework Directive waterbodies or jeopardise the attainment of 'good' overall status of Water Framework Directive waterbodies.
	5.16.15 The Secretary of State should also consider the interactions of the proposed project with other plans such as Water Resources Management Plans and Shoreline Management Plans.	5.16.16 The Secretary of State should also consider the interactions of the proposed project with other plans such as Water Resources Management Plans and Shoreline Management Plans.	As set out in the **FRA [APP/6.4],** surface water runoff from the Solar PV will be managed through Rural SuDS and Natural Flood Management techniques such as grassland/wildflower, which will act to bind soils, slow surface water and increase water quality compared to the baseline scenario. The **FRA [APP/6.4]** includes a Surface Water Drainage Strategy, which sets out how surface water runoff from the Site will be managed in line with the national, regional and local requirements regarding flood risk and drainage. As the Scheme does not have a detailed layout, a detailed drainage strategy cannot be provided at this stage, with the principles and design criteria presented in this document. These criteria will be applied at the detailed design phase and the detailed SuDS. . These measures are set out in the **oCEMP [APP/7.6]** submitted with the DCO Application.
	5.16.16 The Secretary of State should consider proposals to mitigate adverse effects on the water environment and any enhancement measures put forward by the applicant and whether appropriate requirements should be	5.16.17 The Secretary of State should consider proposals to mitigate adverse effects on the water environment and any enhancement measures put forward by the applicant and whether appropriate	**ES Chapter 12: Water Resources [APP/6.2]** assess the impacts of the Scheme on water quality, water bodies or protected areas, and concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse water effects expected across the Scheme's construction,

	attached to any development consent and/or planning obligations are necessary	requirements should be attached to any development consent and/or planning obligations are necessary.	operational and decommissioning phases on water quality, water bodies or protected areas. The residual effects outlined in the assessment rely on controls established within the **oCEMP [APP/7.6], oOEMP [APP/7.8],** the **FRA [APP/6.4]** and the **oDS [APP/7.14].** These outline management plans and the Surface Water Drainage Strategy, which is embedded in the **FRA [APP/6.4]** set out the water-related measures to manage any potential water effects that may arise from the Scheme's construction, operational and decommissioning phases. The SuDS (which will form part of a detailed CEMP(s)) will include details of pre-construction, construction, and post-construction water quality monitoring. These measures are set out in the **oCEMP [APP/7.6]** submitted with the DCO Application.

Table 2 NPS EN-3 – Table of Compliance

Policy	Policy Text	Draft Policy Text	Assessment
Part 1.1 Background	1.1.2 Electricity generation from renewable sources is an essential element of the transition to net zero and meeting our statutory targets for the sixth carbon budget (CB6). Our analysis suggests that demand for electricity is likely to increase significantly over the coming years and could more than double by 2050. This could require a fourfold increase in low carbon electricity generation, with most of this likely to come from renewables.	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 suggests that demand for electricity is likely to increase significantly over the coming years and could more than double by 2050. This could require a fourfold increase in low carbon electricity generation, with most of this likely to come from renewables.	The **Statement of Need [APP/5.4]** explains that the Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure, and low carbon electricity, helping contribute to the UK achieving its Sixth Carbon Budget commitments and stay on track to achieve net zero by 2050. As outlined in **ES Chapter 13: Climate Change [APP/6.2]**, the Scheme could provide enough electricity to power around 57,346 homes per year. This represents a significant contribution towards the delivery of the government's energy objectives and the target of net zero by 2050. This represents a significant contribution towards delivery of the government's energy objectives and target of net zero by 2050. The total energy generated by the Scheme would be around 37.22TWh over the 60-year Scheme lifespan. The **Statement of Need [APP/5.4]** sets out that the Scheme is a leading GB large-scale solar plus storage scheme. If consented, it would be an essential component of the UK's plan to deliver a future of efficient decarbonisation through the deployment of large-scale, technologically and geographically diverse low carbon generation schemes and would also deliver flexibility to the UK electricity market, contributing to lowering bills for consumers through its operational life. The meaningful and timely contributions offered by the Scheme to UK decarbonisation and security of supply, will be critical on the path to net zero beyond delivery of the government's 'Clean Power by 2030' mission. Without the Scheme, a significant and vital opportunity to develop a large-scale low carbon generation scheme will have been passed over, increasing materially the risk that future Carbon Budgets and the net zero 2050 target will not be achieved.
Part 2.4 Climate change adaptation	2.4.11 Solar photovoltaic (PV) sites may also be proposed in low lying exposed sites. For these proposals, applicants should consider, in particular, how plant will be resilient to: • increased risk of flooding; and • impact of higher temperatures	2.4.11 Solar photovoltaic (PV) sites may also be proposed in low lying exposed sites. For these proposals, applicants should consider, in particular, how plant will be resilient to: • increased risk of flooding; and • impact of higher temperatures	**ES Chapter 12: Water Resources [APP/6.2]** confirms that the entirety of the built aspects of the Scheme (Works No. 1-10) is situated in Flood Zone 1; only a small area of the Skylark Mitigation Works No. 11 (approximately 1.1 ha) is within the Flood Zone 2 and 3, which will continue to be used for agricultural activities; therefore, the Sequential Test is not triggered. **ES Chapter 12: Water Resources [APP/6.2]** assess the impacts of the Scheme on water quality, water bodies or protected areas, and concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse water effects expected across the Scheme's construction, operational and decommissioning phases on water quality, water bodies or protected areas. The residual effects outlined in the assessment rely on controls established within the **oCEMP [APP/7.6], oOEMP [APP/7.8],** the **FRA [APP/6.4]** and the **oDS [APP/7.10].** These outline management plans and the Surface Water Drainage Strategy, which is embedded in the **FRA [APP/6.4]** set out the water-related measures to manage any potential water effects that may arise from the Scheme's construction, operational and decommissioning phases. A Surface Water Drainage Strategy (which will form part of a detailed CEMP(s)) will include details of pre-construction, construction, and post-construction water quality monitoring. These measures are set out in the **oCEMP [APP/7.6]** submitted with the DCO Application. As set out in the **FRA [APP/6.4],** surface water runoff from the Solar PV will be managed through Rural SuDS and Natural Flood Management techniques such as

			grassland/wildflower areas, which will act to bind soils, slow surface water and increase water quality compared to the baseline scenario. The **FRA [APP/6.4]** includes a Surface Water Drainage Strategy, which outlines how surface water runoff from the Site will be managed in accordance with national, regional, and local requirements regarding flood risk and drainage. As the Scheme does not have a detailed layout, a detailed drainage strategy cannot be provided at this stage, with the principles and design criteria presented in this document. These criteria will be applied during the detailed design phase, and the detailed SuDS will be secured in the DCO through a requirement of the **draft DCO [APP/3.1].** These measures are set out in the **oCEMP [APP/7.6]** submitted with the DCO Application. The **Design Approach Document [APP/5.7]** outlines the adoption of project-level design principles (Project Principles) to guide decision-making and ensure the integration of good design outcomes into the Scheme. Principle 4.3 ensures the Scheme is resilient to flooding and does not increase flooding elsewhere. The **Design Principles, Parameters and Commitments [APP/5.8]** require the Applicant at the detailed design stage to further consider water runoff with respect to: • the final location of the BESS Compound and layout of the BESS Containers • the final location of the Customer Substation Compound and layout; and • the final location of the National Grid Substation Compound and layout. **ES Chapter 13: Climate Change [APP/6.2]** sets out measures to mitigate the impact of higher temperatures on the Scheme. The Contractor will monitor weather forecasts to ensure works are planned accordingly to protect staff from any extreme weather conditions. BESS equipment will utilise HVAC cooling systems to prevent overheating in warmer weather, as outlined in the **oCEMP [APP/7.7]** and **oOEMP [APP/7.8]**. **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** describes the consideration of reasonable alternatives carried out by the Applicant in relation to the Site for the Scheme, layouts and choice of technology. It is supported by Appendix 1: Site Evaluation Report to this Planning Statement, which provides an appraisal of alternative sites and demonstrates consideration of relevant policy and its applicability to the site evaluation process undertaken by the Applicant**. Appendix 1: Site Evaluation Report** to the **Planning Statement [APP/5.5]** presents the reasoning for why the Scheme and Order limits are located in the Site's particular location.
Part 2.5 Consideration of good design for energy infrastructure	2.5.1 Section 4.7 of EN-1 sets out the criteria for good design that should be applied to all energy infrastructure.	2.5.1 Section 4.7 of EN-1 sets out the criteria for good design that should be applied to all energy infrastructure.	As detailed in Section 2 of the **Planning Statement [APP/5.5]**, good design has been a fundamental consideration from the outset of the Scheme. The **Design Approach Document [APP/5.7]** illustrates how the design of the Scheme has been developed in accordance with a clear design framework, based on the criteria for good design outlined in NPS EN-1. This has included the adoption of project-level design principles (Project Principles) to guide decision-making and embed good design outcomes in the Scheme. Throughout the design process, the Applicant maintained an interdisciplinary approach to design, considering both the opportunities and constraints of the Scheme. This included an analysis of the existing physical, environmental, social, and cultural context of the Site by a broad range of technical disciplines (including landscape and visual, noise, ecology, and heritage) as set out and assessed by **ES Topic Chapters [APP/6.2].**
	2.5.2 Proposals for renewable energy infrastructure should demonstrate good design, particularly in respect of landscape and visual amenity, opportunities for co-existence/co-location with other marine and terrestrial uses, and in the design of the project to mitigate impacts such as noise and effects on ecology and heritage.	2.5.2 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.	

			The **Works Plan [APP/2.3]** and the **Design Principles, Parameters and Commitments [APP/5.8]** secure the design of the Scheme through the **draft DCO [APP/3.1]**
Part 2.6 Flexibility in the project details	2.6.1 Where details are still to be finalised, applicants should explain in the application which elements of the proposal have yet to be finalised, and the reason why this is the case.	2.6.1 Where details are still to be finalised, applicants should explain in the application which elements of the proposal have yet to be finalised, and the reason why this is the case.	The Applicant wishes to retain flexibility regarding the design detail of certain components of the Scheme. The extent of flexibility required is described in **ES Chapter 5: The Scheme [APP/6.1]** and outlined in the **Design Approach Document [APP/5.7]** and **Design Principles, Parameters, and Commitments [APP/5.8]**. The Applicant's approach to EIA, including the use of the Rochdale envelope to assess effects, is set out in **ES Chapter 5: The Scheme [APP/6.1]** and **ES Chapter 3: EIA Process and Methodology [APP/6.1]**. With the above need for flexibility in mind, the Applicant confirms that the ES has assessed the likely worst-case development scenario. Establishing the maximum and, where relevant, minimum parameters enables a robust assessment of likely significant environmental effects to be undertaken within the ES for topics where the nature of the assessment requires a specific level of detail, such as maximum heights, massing, or noise levels. Thus, the assessment parameters serve as the basis for the assessment. The assessment parameters are detailed in the works descriptions, which are linked to Schedule 1 within the **draft DCO [APP/3.1]** and are spatially shown in the **Works Plan [APP/2.3]** and a number of control documents, as listed within the **Guide to the Application [APP/1.2].** The Applicant confirms that it has provided a level of information proportionate to the scale of the Scheme which is sufficient to meet the requirements of the EIA Regulations.
	2.6.2 Where flexibility is sought in the consent as a result, applicants should, to the best of their knowledge, assess the likely worst-case environmental, social and economic effects of the proposed development to ensure that the impacts of the project as it may be constructed have been properly assessed.	2.6.2 Where flexibility is sought in the consent as a result, applicants should, to the best of their knowledge, assess the likely worst-case environmental, social and economic effects of the proposed development to ensure that the impacts of the project as it may be constructed have been properly assessed.	
	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.	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.	
Applicant Assessment– Irradiance and site topography	2.10.19 Irradiance will be a key consideration for the applicant in identifying a potential site as the amount of electricity generated on site is directly affected by irradiance levels. Irradiance of a site will in turn be affected by surrounding topography, with an uncovered or exposed site of good elevation and favourable south-facing aspect more likely to increase year-round irradiance levels. This in turn affects the carbon emission savings and the commercial viability of the site.	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.	**Appendix 1: Site Evaluation Report** to the **Planning Statement [APP/5.5]** presents the reasoning for why the Scheme and Order limits are located in the Site's particular location. As outlined in **ES Chapter 4: Alternative and Design Evolution [APP/6.2],** Norfolk is a suitable location within the UK for constructing a solar farm, as the area benefits from higher levels of photovoltaic power and irradiance compared to other parts of the UK. Flat or gently south-facing slopes are most suitable and beneficial for solar. Topography, which is generally flat or gently undulating, is most suitable for solar energy from both a constructability and operational perspective, ensuring that the Site can produce a large amount of electricity. This factor has influenced the focus on the Norfolk area as the preferred location of the Scheme. The general topography surrounding the Site is flat or has limited gradients, making it particularly suitable for solar energy. In addition, Norfolk benefits from large areas of land characterised by a generally sparse settlement pattern. Such characteristics provide the opportunity for utility-scale solar development, which can contribute to delivering net zero. Due to the fast-evolving pace of Solar PV technology, the Scheme has allowed for flexibility in the design, allowing opportunity to utilise specific technology closer to construction within the parameters outlined in **ES Chapter 5: The Scheme [APP/6.1]** and the **Design Approach Document [APP/5.7].** For example, both tracker and fixed panels are proposed at this stage, with the final design being confirmed at the detailed design stage.
	2.10.20 In order to maximise irradiance, applicants may choose a site and design its layout with variable and diverse panel types and aspects, and panel arrays may also follow the movement of the sun in order further to maximise the solar resource.	2.10.12 In order to maximise irradiance, applicants may choose a site and design its layout with variable and diverse panel types and aspects, and panel arrays may also follow the movement of the sun in order further to maximise the solar resource.	
Applicant Assessment – Network Connection	2.10.21 Applicants should consider important issues relating to network connection at Section 4.11 of EN-1 and in EN-5. In particular, and where appropriate, applicants should proceed in a manner consistent with	2.10.13 Applicants should consider important issues relating to network connection at Section 4.11 of EN-1 and in EN-5. In particular, and where appropriate, applicants should proceed in a manner consistent with	The Applicant engaged with NGET to discuss potential opportunities for a connection offer within the Norfolk area. The network has availability for a suitable grid connection into the existing OHL between Walpole and Necton, with sufficient capacity available to support a solar scheme of a viable size. Subsequently, a grid connection offer was made for a 500MW capacity in Swaffham, as outlined in the **Grid Connection Statement [APP/7.1].** The **Works**

	the regulatory regime for offshore transmission networks established by Ofgem, details of which are set out in EN-5.	the regulatory regime for offshore transmission networks established by Ofgem, details of which are set out in EN-5.	**Plan [APP/2.3]** accurately reflects this recent engagement, whilst the illustrative material submitted together with this DCO Application (for example, **ES Figure 5.1: Concept Masterplan [APP/6.3]** and **ES Appendix 5.1: Illustrative Technical Information [APP/6.4]** will be revised as the micro-siting and orientation of the new National Grid Substation within Work No. 4A continues to be discussed. The Applicant had considered existing substations (Walpole, Necton and Norwich Main) as the connection point only to find that these could not accommodate a suitable connection. Following discussions with NGET, it was identified that capacity was available on the circuits and that the National Grid Substation was required for the Applicant to connect the Scheme to the grid.
	2.10.22 Many solar farms are connected into the local distribution network. The capacity of the local grid network to accept the likely output from a proposed solar farm is critical to the technical and commercial feasibility of a development proposal.	2.10.14 Many solar farms are connected into the local distribution network. The capacity of the local grid network to accept the likely output from a proposed solar farm is critical to the technical and commercial feasibility of a development proposal.	
	2.10.23 Larger developments may seek connection to the transmission network if there is available network capacity and/or supportive infrastructure.	2.10.15 Larger developments may seek connection to the transmission network if there is available network capacity and/or supportive infrastructure.	
	2.10.24 In either case the connection voltage, availability of network capacity, and the distance from the solar farm to the existing network can have a significant effect on the commercial feasibility of a development proposal.	2.10.16 In either case the connection voltage, availability of network capacity, and the distance from the solar farm to the existing network can have a significant effect on the commercial feasibility of a development proposal.	
	2.10.25 To maximise existing grid infrastructure, minimise disruption to existing local community infrastructure or biodiversity and reduce overall costs, applicants may choose a site based on nearby available grid export capacity.	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.	**Appendix 1: Site Evaluation Report** to the **Planning Statement [APP/5.5]** present the reasoning for why the Scheme is located in the Site's particular location, which includes the siting of the proposed new National Grid Substation. The Applicant has split the site evaluation process into two parts: the first part is the National Grid Substation siting assessment, and the second part is the Site Evaluation of the solar development Site, as set out in the **Site Evaluation Report (Appendix 1** to the **Planning Statement [APP/5.5]).** The **Site Evaluation Report** confirms that a key principle in the site evaluation process was to avoid areas of particular environmental and landscape sensitivity where possible to minimise potential impacts. **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** adds that, among other considerations, the Applicant sought to develop a Scheme that would avoid impacts on sensitive landscapes and environmental features as far as practicable. As part of the grid connection offer from National Grid, the Applicant is required to obtain land and consent for a new National Grid Substation within the DCO. This is detailed in the **Grid Connection Statement [APP/7.1],** which explains that the National Grid Substation is to be sited and designed to connect the Scheme to the 400kV transmission network between the existing substations at Necton and Walpole.
	2.10.26 Where this is the case, applicants should consider the cumulative impacts of situating a solar farm in proximity to other energy generating stations and infrastructure.	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.	As set out in **ES Chapter 2: EIA Process and Methodology [APP/6.1]**, a Cumulative Effects Assessment (CEA) has been undertaken as part of the EIA in accordance with PINS Advice on Cumulative Effects Assessment (September 2024) and has considered two types of cumulative effects. • In combination effects: the combined effect generated by individual effects on a particular receptor (presented within **ES Chapter 17: In-Combination Effects [APP/6.2]**); and

			• Cumulative effects: effects generated by the Scheme and other planned or approved developments on the same receptor (presented in **ES Chapters 6 to 16 [APP/6.2]**).
Applicant Assessment – Proximity of site to dwellings	2.10.27 Utility-scale solar farms are large sites that may have a significant zone of visual influence. The two main impact issues that determine distances to sensitive receptors are therefore likely to be visual amenity and glint and glare. These are considered in Landscape, Visual and Residential Amenity (paragraphs 2.10.93-2.10.101) and Glint and Glare (paragraphs 2.10.102 – 2.10.106) impact sections below.	2.10.19 Utility-scale solar farms are large sites that may have a significant zone of visual influence. The two main impact issues that determine distances to sensitive receptors are therefore likely to be visual amenity and glint and glare. These are considered in Landscape, Visual and Residential Amenity (paragraphs 2.10.93-2.10.101) and Glint and Glare (paragraphs 2.10.102 – 2.10.106) impact sections of this NPS.	**ES Chapter 6: Landscape and Visual [APP/6.2]** provides an assessment of the Scheme's impact on landscape and visual within the Order limits, or that will be impacted by the Scheme. The chapter is accompanied by **ES Appendix 6.7: Residential Visual Amenity Assessment [APP/6.4],** which considers the effects on residential visual amenity. **ES Appendix 6.7: Residential Visual Amenity Assessment [APP/6.4]** concludes that the Residential Visual Amenity threshold would not be reached for any properties within the study area. Effects on all properties would not be sufficiently "oppressive" or "overbearing" that any property would be rendered an unattractive place in which to live. Residents are identified as a primary visual receptor within the study area likely to be affected by the Scheme. Residential properties included in the study area are shown on **ES Figure 6.9: Residential Properties [APP/6.3].** **ES Chapter 16: Other Environmental Matters [APP/6.2]** assess glint and glare effects in respect of those matters that are scoped in. The locations of relevant receptors are shown within the supporting **ES Appendix 16.2: Solar Photovoltaic Glint and Glare Study [APP/6.4],** including, but not limited to, dwellings within the 1km Study Area (44 dwelling receptors). **ES Chapter 16: Other Environmental Matters [APP/6.2]** concludes that, with embedded mitigation measures in place, there is no potential for significant glint and glare effects as a result of the Scheme's construction, operational and decommissioning phases, including on dwellings. Embedded mitigation measures have been included in the **ES Appendix 16.2: Solar Photovoltaic Glint and Glare Study [APP/6.4]**. Advanced planting and hedgerow enhancement will be undertaken during winter 2025 and are to be completed during winter 2026 along the eastern boundary of the Site, as outlined in **Appendix 3: Advanced Planting Plan** of the **oLEMP [APP/7.11].**
Applicant Assessment – Agriculture Land Classification and land type	2.10.28 Solar is a highly flexible technology and as such can be deployed on a wide variety of land types.	2.10.20 Solar is a highly flexible technology and as such can be deployed on a wide variety of land types.	**Appendix 1: Site Evaluation Report** to the **Planning Statement [APP/5.5]** presents the reasoning for why the Scheme and Order limits are located in the Site's particular location. In line with this policy, **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1** confirms that the Applicant has considered whether sufficient previously developed land (including available previously developed industrial land) would be available to develop a utility-scale solar development. The search of Breckland Council and the Borough Council of King's Lynn & West Norfolk's brownfield registers confirmed that none of the brownfield sites would have the capability of meeting the project objectives, largely due to the size of the sites. The use of commercial rooftops was not considered as an alternative to the scheme. A very large number of commercial rooftops would be required to deliver a utility-scale solar farm. This would require multiple land ownerships, and the legal complexities involved in combining multiple sites of this nature would be prohibitive. The Applicant sought to identify countryside/undeveloped greenfield land, which, according to the provisional ALC mapping (provided by DEFRA and Natural England), could meet the objectives of the Scheme whilst avoiding, as far as practicable, the take of BMV land. It is concluded that 48.3% of the Site is non-BMV and 51.7% of the Site is BMV. Further
	2.10.29 While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of "Best and Most Versatile" agricultural land where possible. 'Best and Most Versatile agricultural land is defined as land in grades	2.10.21 While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of "Best and Most Versatile" agricultural land where possible. 'Best and Most Versatile agricultural land is defined as land in grades	

	1, 2 and 3a of the Agricultural Land Classification	1, 2 and 3a of the Agricultural Land Classification.	information on ALC is provided in **ES Appendix 11.2: ALC Survey [APP/6.4].** At a site design level, the Applicant has sought to, where possible, reduce the use of BMV land; however, due to the nature of the land quality within the Order limits and the general classification both locally and on a wider scale in Norfolk, it has not been possible to avoid it entirely. The steps the Applicant has taken to avoid, reduce, and subsequently mitigate impacts on BMV are explained below.
	2.10.30 Whilst the development of ground mounted solar arrays is not prohibited on Best and Most Versatile agricultural land, or sites designated for their natural beauty, or recognised for ecological or archaeological importance, the impacts of such are expected to be considered and are discussed under paragraphs 2.10.73 – 92 and 2.10.107 – 2.10.126.	2.10.22 Whilst the development of ground mounted solar arrays is not prohibited on Best and Most Versatile agricultural land, or sites designated for their natural beauty, or recognised for ecological or archaeological importance, the impacts of such are expected to be considered and are discussed under paragraphs 2.10.73 – 92 and 2.10.107 – 2.10.126 of this NPS.	**ES Chapter 11: Soils and Agriculture [APP/6.2]** sets out an assessment which demonstrates that the effects of the Scheme being on BMV land have been considered. It is acknowledged that development of ground mounted solar arrays is not prohibited on BMV agricultural land. The Scheme is mostly temporary and reversible in nature and therefore will have a low magnitude affect the long-term agricultural resource. When the operational phase ends, the Solar PV Site would be decommissioned and the land returned to its original use and condition as far as practicable and returned to the landowner. The National Grid Substation and the Grid Connection Infrastructure would remain in situ as these assets will form part of the NETS. The decommissioning measures set out in the **oDS [APP/7.10]** are secured by Requirement 20 in Schedule 2 of the **draft DCO [APP/3.1].**
	2.10.31 It is recognised that at this scale, it is likely that applicants' developments will use some agricultural land. Applicants should explain their choice of site, noting the preference for development to be on suitable brownfield, industrial and low and medium grade agricultural land.	2.10.23 It is recognised that at this scale, it is likely that applicants' developments will use some agricultural land. Applicants should explain their choice of site, noting the preference for development to be on suitable brownfield, industrial and low and medium grade agricultural land.	**Appendix 1: Site Evaluation Report** to the **Planning Statement [APP/5.5]** presents the reasoning for why the Scheme and Order limits are located in the Site's particular location. In line with this policy, **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1** confirms that the Applicant has considered whether sufficient previously developed land (including available previously developed industrial land) would be available to develop a utility scale solar development. The search of Breckland Council and the Borough Council of King's Lynn & West Norfolk's brownfield registers confirmed that none of the brownfield sites would have the capability of meeting the project objectives, largely due to the size of the sites. The use of commercial rooftops was not considered as an alternative to the scheme. A very large number of commercial rooftops would be required to deliver a utility-scale solar farm. This would require multiple land ownerships, and the legal complexities involved in combining multiple sites of this nature would be prohibitive. The Applicant sought to identify countryside/undeveloped greenfield land which according to the provisional ALC mapping (provided by DEFRA and Natural England) could meet the objectives of the Scheme whilst avoiding as far as practicable the take of BMV land. It is concluded that 48.3% of the Site is non-BMV and 51.7% of the Site is BMV land. Further information on ALC is provided in **ES Appendix 11.2: ALC Survey [APP/6.4].** At a site design level, the Applicant has sought to, where possible, reduce the use of BMV land; however, due to the nature of the land quality within the Order limits and the general classification both locally and on a wider scale in Norfolk, it has not been possible to avoid it entirely. The steps the Applicant has taken to avoid, reduce, and subsequently mitigate impacts on BMV are explained below.
	2.10.32 Where sited on agricultural land, consideration may be given as to whether the proposal allows for continued agricultural use and/or can be co-located with other functions (for example, onshore wind generation, storage, hydrogen electrolysers) to maximise the efficiency of land use.	2.10.24 Where sited on agricultural land, consideration may be given as to whether the proposal allows for continued agricultural use and/or can be co-located with other functions (for example, onshore wind generation, storage, hydrogen electrolysers) to maximise the efficiency of land use.	
	2.10.33 The Agricultural Land Classification (ALC) is the only approved system for grading agricultural quality in England and Wales and, if necessary, field surveys should be used to establish the ALC grades in accordance with the current, or any successor to it, grading criteria and identify the soil types to inform soil management at the construction, operation, and decommissioning phases in line with the Defra Construction Code.	2.10.25 The Agricultural Land Classification (ALC) is the only approved system for grading agricultural quality in England and Wales and, if necessary, field surveys should be used to establish the ALC grades in accordance with the current, or any successor to it, grading criteria and identify the soil types to inform soil management at the construction, operation, and decommissioning phases in line with the Defra Construction Code.	
	2.10.34 Applicants are encouraged to develop and implement a Soil Resources and Management Plan which could help to use and manage soils sustainably and minimise adverse impacts on soil health and potential land contamination. This should be	2.10.26 Applicants are encouraged to develop and implement a Soil Resources and Management Plan which could help to use and manage soils sustainably and minimise adverse impacts on soil health and potential land contamination. This should be	The Applicant has provided an **oSMP [APP/7.13]** which sets out how soil will be handled, monitored, and restored during the lifetime of the Scheme. The **oSMP [APP/7.13]** is secured via a requirement of the **draft DCO [APP/3.1].** Section 11.8 of **ES Chapter 11: Soil and Agriculture [APP/6.2]** sets out that by following the measures within the **oSMP [APP/7.13],** soils will not be permanently affected. The impact

	in line with the ambition set out in the Environmental Improvement Plan to bring at least 40% of England's agricultural soils into sustainable management by 2028 and increase this up to 60% by 2030.	in line with the ambition set out in the Environmental Improvement Plan to bring at least 40% of England's agricultural soils into sustainable management by 2028 and increase this up to 60% by 2030. This should include consideration of mitigation against impacts to peat soils where these are present	will be temporary and of low magnitude, resulting in a minor adverse effect which is not significant in EIA terms.
Applicant Assessment – Accessibility	2.10.35 Applicants will need to consider the suitability of the access routes to the proposed site for both the construction and operation of the solar farm with the former likely to raise more issues.	2.10.27 Applicants will need to consider the suitability of the access routes to the proposed site for both the construction and operation of the solar farm with the former likely to raise more issues.	Section 4 of the **oCTMP [APP/7.7]** sets out the construction vehicle routing and the Applicant notes that the agreed routing for vehicles is as agreed with NCC and NH. It is proposed that all construction vehicles and HGVs access the Scheme from the A47, which is part of the Strategic Road Network (SRN) to the south, where possible, then travel along the A1065 before entering via the relevant access point onto the A1065. These routes provide the shortest distance between various access points associated with the Scheme and SRN (A47), preventing travel on unsuitable roads and avoiding material harm. Given the rural siting of the Scheme, the Applicant has considered access points for construction and operational vehicles. Section 2.3 of the **oCTMP [APP/7.7]** sets out an overview of the proposed access locations for the Scheme. Figure 41 in Section 4.1 of the **oCTMP [APP/7.7]** sets out the proposed construction routing for this Scheme. This covers both routes to/from the Scheme as well as within the Scheme. Furthermore, the Applicant has provided an **Access and Rights of Way Plan [APP/2.5]** and an **oPRoWPPMP [APP/7.12],** which set out an overview of the accessible routes and access points available to pedestrians and cyclists. Section 4.1 of the **oCTMP [APP/7.7]** outlines the access routes that connect the Scheme to the public road network. The access routes necessary for operation and maintenance are also set out in Figure 41 of Section 4.1 of the **oCTMP [APP/7.7]. ES Chapter 9: Transport and Access [APP/6.2]** concludes that with the embedded mitigation in place across the **oCEMP [APP/7.6], oCTMP [APP/7.7], oOEMP [APP/7.8], oOTMP [APP/7.9], oDS [APP/7.10]**, and **oPRoWPPMP [APP/7.12]**, there are no residual transport and access effects expected across the Scheme's construction, operational, and decommissioning phases. The Scheme aims to utilise existing access points onto the Local Road Network to minimise the associated environmental impacts; however, where this is not feasible, a new vehicle access is proposed in **ES Appendix 9.2: Traffic Assessment [APP/6.4],** which is compliant with all relevant highway safety requirements.
	2.10.36 Given that potential solar farm sites are largely in rural areas, access for the delivery of solar arrays and associated infrastructure during construction can be a significant consideration for solar farm siting.	2.10.28 Given that potential solar farm sites are largely in rural areas, access for the delivery of solar arrays and associated infrastructure during construction can be a significant consideration for solar farm siting.	
	2.10.37 Developers will usually need to construct on-site access routes for operation and maintenance activities, such as footpaths, earthworks, or landscaping.	2.10.29 Developers will usually need to construct on-site access routes for operation and maintenance activities, such as footpaths, earthworks, or landscaping.	
	2.10.38 In addition, sometimes access routes will need to be constructed to connect solar farms to the public road network.	2.10.30 In addition, sometimes access routes will need to be constructed to connect solar farms to the public road network.	
	2.10.39 Applications should include the full extent of the access routes necessary for operation and maintenance and an assessment of their effects.	2.10.31 Applications should include the full extent of the access routes necessary for operation and maintenance and an assessment of their effects.	
Applicant Assessment – Public Rights of Way	2.10.40 Proposed developments may affect the provision of public rights of way networks.	2.10.32 Proposed developments may affect the provision of public rights of way networks.	The Applicant has provided an **oPRoWPPMP [APP/7.12]** which sets out measures to mitigate the impact of the Scheme on public rights of way networks. Section 1.4 of the **oPRoWPPMP [APP/7.12]** sets out that the Applicant does not anticipate any additional diversions to the footpath diversions highlighted in Work No. 6 of the **oPRoWPPMP [APP/7.12]**. This section also states that the Applicant will only temporarily close, restrict or divert a PRoW if management measures are considered insufficient. This is to ensure the safety of users and/or in the case of an emergency. As set out in the **oPRoWPPMP [APP/7.12],** the alignment of existing PRoW within the Site has been incorporated into the design of the Scheme. As such, the alignment of PRoW will be unaffected by the Scheme during the operation and maintenance phase of the Scheme.

			The **Design Approach Document [APP/5.7]** sets out Project Principles which have influenced the design evolution to prioritise social value and community benefits. Project Principles 2.9 and 5.10 sets out that the Scheme will consider the experience of people using the PRoW retain all PRoWs on the existing alignment during the operational phase. Section 1.4 of the **oPRoWPPMP [APP/7.12]** outlines the mitigation measures proposed to protect PROW users during the construction phase: • Provision of banksmen to hold vehicles when PRoW users are present, and to advise PRoW users of potential vehicle movements • Wider access tracks to create more room for PRoW users when vehicles pass them • Reduced speed limit of 5 – 10mph • Drivers will stop and give-way to any PRoW user that they encounter • Appropriate signage will be installed to make PRoW users aware of construction activity, including times and the contact details for a public liaison officer • The PRoW will be kept clear of construction vehicles and apparatus outside of the permitted construction hours where practicable; and • Any damage to the PRoW will be repaired as soon as practicable. The **oPRoWPPMP [APP/7.12]** states that there are approximately 3,785 linear metres of permissive path proposed within the Order limits. Furthermore, Paragraph 1.5.10 of the **oPRoWPPMP [APP/7.12]** states that opportunities associated with the provision of new permissive paths are outlined in the **oLEMP [APP/7.11]**.
	2.10.41 Public rights of way may need to be temporarily closed or diverted to enable construction, however, applicants should keep, as far as is practicable and safe, all public rights of way that cross the proposed development site open during construction and protect users where a public right of way borders or crosses the site.	2.10.33 Public rights of way may need to be temporarily closed or diverted to enable construction, however, applicants should keep, as far as is practicable and safe, all public rights of way that cross the proposed development site open during construction and protect users where a public right of way borders or crosses the site.	Section 1.4 of the **oPRoWPPMP [APP/7.12]** sets out that the Applicant does not anticipate any additional diversions to the footpath diversions highlighted in Work No. 6 of the **oPRoWPPMP [APP/7.12]**. This section also states that the Applicant will only temporarily close, restrict or divert a PRoW if management measures are considered insufficient. This is to ensure the safety of users and/or in the case of an emergency. As set out in the **oPRoWPPMP [APP/7.12],** the alignment of existing PRoW within the Site has been incorporated into the design of the Scheme. As such, the alignment of PRoW will be unaffected by the Scheme during the operation and maintenance phase of the Scheme. The **Design Approach Document [APP/5.7]** sets out Project Principles which have influenced the design evolution to prioritise social value and community benefits. Project Principles 2.9 and 5.10 sets out that the Scheme will consider the experience of people using the PRoW retain all PRoWs on the existing alignment during the operational phase.
	2.10.42 Applicants are encouraged to design the layout and appearance of the site to ensure continued recreational use of public rights of way where possible during construction, and in particular during operation of the site.	2.10.34 Applicants are encouraged to design the layout and appearance of the site to ensure continued recreational use of public rights of way where possible during construction, and in particular during operation of the site.	The Applicant has incorporated existing PRoWs into the design of the Scheme, as set out in Section 1.5 of the **oPRoWPPMP [APP/7.12]**. Furthermore, the following mitigation measures are set out in Section 1.4 to ensure continued recreational use of PRoW: • Provision of banksmen to hold vehicles when PRoW users are present, and to advise PRoW users of potential vehicle movements • Wider access tracks to create more room for PRoW users when vehicles pass them • Drivers will stop and give way to any PRoW user that they encounter • Appropriate signage will be installed to make PRoW users aware of construction activity, including times and the contact details for a public liaison officer; and

			• The PRoW will be kept clear of construction vehicles and apparatus outside of the permitted construction hours where practicable. Likewise, during the operation phase, vehicle visits will be infrequent; therefore, the number of vehicles which may cross the PRoW is much smaller than during the construction phase. In cases where this may occur, additional staff will be present for maintenance and cleaning activities to minimise disruption to PRoW users. **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** describes the consideration of reasonable alternatives carried out by the Applicant in relation to the Site for the Scheme, layouts and choice of technology. It is supported by **Appendix 1: Site Evaluation Report** to the **Planning Statement [APP/5.5]**, which provides an appraisal of alternative sites and demonstrates consideration of relevant policy and its applicability to the site evaluation process undertaken by the Applicant. The Site evaluation involved a number of factors, including, but not limited to accessibility such as the suitability of the access routes both during construction and operation.
	2.10.43 Applicants are encouraged where possible to minimise the visual impacts of the development for those using existing public rights of way, considering the impacts this may have on any other visual amenities in the surrounding landscape.	2.10.35 Applicants are encouraged where possible to minimise the visual impacts of the development for those using existing public rights of way, considering the impacts this may have on any other visual amenities in the surrounding landscape	Section 1.5 of the **oPRoWPPMP [APP/7.12]** stipulates that a minimum 15m buffer will be maintained around any infrastructure associated with the Scheme, which will help mitigate visual impacts resulting from the Scheme. Section 6.8 of **ES Chapter 6: Landscape and Visual [APP/6.2]** sets out that existing hedgerows, trees and woodland along the northern and eastern field parcel boundaries serve to partially screen oblique short distance views of the Scheme from this PRoW. Furthermore, the long-term visual effects are deemed not significant when considering the mitigation for nearby views from this PRoW.
	2.10.44 Applicants should consider and maximise opportunities to facilitate enhancements to the public rights of way and the inclusion, through site layout and design of access, of new opportunities for the public to access and cross proposed solar development sites (whether via the adoption of new public rights of way or the creation of permissive paths), taking into account, where appropriate, the views of landowners.	2.10.36 Applicants should consider and maximise opportunities to facilitate enhancements to the public rights of way and the inclusion, through site layout and design of access, of new opportunities for the public to access and cross proposed solar development sites (whether via the adoption of new public rights of way or the creation of permissive paths), taking into account, where appropriate, the views of landowners.	Paragraph 1.5.8 of the **oPRoWPPMP [APP/7.12]** sets out that there are approximately 3785 linear metres of permissive path proposed within the Order limits. Furthermore, Paragraph 1.5.10 of the **oPRoWPPMP [APP/7.12]** states that opportunities associated with the provision of new permissive paths are outlined in the **oLEMP [APP/7.11]**.
	2.10.45 Applicants should set out detail on how public rights of way would be managed to ensure they are safe to use in an outline Public Rights of Way Management Plan.	2.10.37 Applicants should set out detail on how public rights of way would be managed to ensure they are safe to use in an outline Public Rights of Way Management Plan.	Section 1.4 of the **oPRoWPPMP [APP/7.12]** set out the following mitigation for the construction phase: • Provision of banksmen to hold vehicles when PRoW users are present, and to advise PRoW users of potential vehicle movements • Wider access tracks to create more room for PRoW users when vehicles pass them • Reduced speed limit of 5 – 10mph • Drivers will stop and give way to any PRoW user that they encounter • Appropriate signage will be installed to make PRoW users aware of construction activity, including times and the contact details for a public liaison officer • The PRoW will be kept clear of construction vehicles and apparatus outside of the permitted construction hours where practicable; and • Any damage to the PRoW will be repaired as soon as practicable.

			Further mitigation measures are highlighted for the operation and maintenance phase: • Incorporation of existing PRoW into the design of the Scheme • All PRoW will have a minimum 15m buffer to any infrastructure associated with the Scheme • Maintenance activities such as periodic fence inspections, vegetation management, and permissive paths and landscape ecological mitigation maintenance; and • Where vehicles may have to cross the PRoW these visits will be infrequent, involve a small number of daily trips, only use cars/4x4 type vehicles or small vans, and additional staff will attend for maintenance and cleaning. The **oPRoWPPMP [APP/7.12]** is secured via a requirement of the **draft DCO [APP/3.1].**
Applicant Assessment – Security and Lighting	2.10.46 Security of the site is a key consideration for developers. Applicants may wish to consider not only the availability of natural defences such as steep gradients, hedging and rivers but also perimeter security measures such as fencing, electronic security, CCTV and lighting, with the measures proposed on a site-specific basis.	2.10.38 Security of the site is a key consideration for developers. Applicants may wish to consider not only the availability of natural defences such as steep gradients, hedging and rivers but also perimeter security measures such as fencing, electronic security, CCTV and lighting, with the measures proposed on a site-specific basis.	**ES Chapter 5: The Scheme [APP/6.1]** sets out that during operation; a perimeter fence will enclose the operational area of the Scheme. A Deer fence will enclose the PV Arrays, whilst a Palisade fence will enclose the Conversion Units, 33kV Sub-distribution Switch Rooms, BESS, Customer Substation and National Grid Substation. The deer fence will be wooden or metal posts with a wire mesh up to 2.5m in height. Palisade fencing would be up to 3m in height, as secured through the **Design Principles, Parameters and Commitments [APP/5.8]**. **ES Chapter 5: The Scheme [APP/6.1]** sets out that pole mounted internal facing closed circuit television (CCTV) systems installed at a height of up to 3m will be deployed around the perimeter of the Site. The CCTV cameras would use night-vision technology, which would be monitored remotely and avoid the need for night-time lighting of the Solar PV Site, as secured through the **Design Principles, Parameters and Commitments [APP/5.8]**.
	2.10.47 Applicants should assess the visual impact of these security measures, as well as the impacts on local residents, including for example issues relating to intrusion from CCTV and light pollution in the vicinity of the site.	2.10.39 Applicants should assess the visual impact of these security measures, as well as the impacts on local residents, including for example issues relating to intrusion from CCTV and light pollution in the vicinity of the site.	
	2.10.48 Applicants should consider the need to minimise the impact on the landscape and the visual impact of security measures.	2.10.40 Applicants should consider the need to minimise the impact on the landscape and the visual impact of security measures.	
Technical Considerations – Capacity of a site	2.10.49 Applications for solar farms are likely to comprise a number of elements including solar panel arrays, piling, inverters, mounting structures, cabling, earthworks, and measures associated with site security, and may also include associated infrastructure such as energy storage and electrolysers associated with the production of low carbon hydrogen	2.10.41 Applications for solar farms are likely to comprise a number of elements including solar panel arrays, piling, inverters, mounting structures, cabling, earthworks, and measures associated with site security, and may also include associated infrastructure such as energy storage and electrolysers associated with the production of low carbon hydrogen	The Applicant wishes to retain flexibility regarding the design detail of certain components of the Scheme. The extent of flexibility sought by the Applicant is described in **ES Chapter 5: The Scheme [APP/6.1]**. It is important to note that the exact design details of the Scheme cannot be confirmed until consent is granted and the construction tendering process for the design has been completed. The local planning authorities would be required to approve the detailed design in advance of works commencing, should development consent be granted. The detailed design must be approved by the relevant planning authority in accordance with the requirements outlined in the **draft DCO [APP/3.1]** and must comply with the **Works Plan [APP/2.3]**. To maintain flexibility in the design and layout at this stage in the process and ensure maximum effects are assessed in the EIA and considered by the Secretary of State, the Scheme has adopted the Rochdale Envelope approach, This involves specifying parameter ranges, including details of the maximum and where relevant minimum size (footprint, width,
	2.10.50 Solar panels generate electricity in direct current (DC) form. A number of panels feed an external inverter, which is used to convert the electricity to alternating current (AC). After inversion a transformer will step-up the voltage for export to the grid. Because the inverter is separate from the panels, the total capacity of a solar farm can be	2.10.42 Solar panels generate electricity in direct current (DC) form. A number of panels feed an external inverter, which is used to convert the electricity to alternating current (AC). After inversion a transformer will step-up the voltage for export to the grid. Because the inverter is separate from the panels, the total capacity of a solar farm can be	

	measured either in terms of the combined capacity of installed solar panels (measured in DC) or in terms of combined capacity of installed inverters (measured in AC).	measured either in terms of the combined capacity of installed solar panels (measured in DC) or in terms of combined capacity of installed inverters (measured in AC).	height), technology, and locations of the different elements of the Scheme where flexibility needs to be retained. The use of the Rochdale Envelope has therefore been adopted to ensure that the likely worst-case scenario is presented in the assessment of potential environmental effects from the Scheme. As set out in the **Statement of Need [APP/5.4]** degradation of solar panels may mean that panels need to be replaced during the operational life of solar schemes. Other than in instances of the premature failure of individual panels (which would likely be replaced under a warranted maintenance arrangement) panel replacement is likely to be guided by data gathered through monitoring panel performance throughout the life of the solar scheme. This may be carried out on a rolling or programmed basis subject to any parameters which defined the assessment of the solar scheme's impacts on the environment.
	2.10.53 From the date of designation of this NPS, for the purposes of Section 15 of the Planning Act 2008, the maximum combined capacity of the installed inverters (measured in alternating current (AC)) should be used for the purposes of determining solar site capacity.	2.10.45 For the purposes of section 15 of the Planning Act 2008, the maximum combined capacity of the installed inverters (measured in alternating current (AC)) should be used for the purposes of determining solar site capacity.	
	2.10.55 The installed generating capacity of a solar farm will decline over time in correlation with the reduction in panel array efficiency. There is a range of sources of degradation that developers need to consider when deciding on a solar panel technology to be used. Applicants may account for this by overplanting solar panel arrays.	2.10.47 The installed generating capacity of a solar farm will decline over time in correlation with the reduction in panel array efficiency. There is a range of sources of degradation that developers need to consider when deciding on a solar panel technology to be used. Applicants may account for this by overplanting solar panel arrays.	
	2.10.56 AC installed export capacity should not be seen as an appropriate tool to constrain the impacts of a solar farm. Applicants should use other measurements, such as panel size, total area and percentage of ground cover to set the maximum extent of development when determining the planning impacts of an application.	2.10.48 AC installed export capacity should not be seen as an appropriate tool to constrain the impacts of a solar farm. Applicants should use other measurements, such as panel size, total area and percentage of ground cover to set the maximum extent of development when determining the planning impacts of an application.	
Technical Considerations – Site layout design, and appearance	2.10.59 Applicants should consider the criteria for good design set out in EN-1 Section 4.7 at an early stage when developing projects.	2.10.51 Applicants should consider the criteria for good design set out in Section 4.7 of EN-1 at an early stage when developing projects.	As detailed in Section 2 of the **Planning Statement [APP/5.5]**, good design has been a key consideration from the outset for the Applicant.
	2.10.60 As set out above applicants will consider several factors when considering the design and layout of sites, including proximity to available grid capacity to accommodate the scale of generation, orientation, topography, previous land–use, and ability to mitigate environmental impacts and flood risk.	2.10.52 As set out above applicants will consider several factors when considering the design and layout of sites, including proximity to available grid capacity to accommodate the scale of generation, orientation, topography, previous land–use, and ability to mitigate environmental impacts and flood risk.	**ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** and **Appendix 1: Site Evaluation Report** to the **Planning Statement [APP/5.5]** describe the detailed site evaluation and assessment of alternatives process undertaken by the Applicant. As set out in these documents, the location and design of the Scheme is the result of a comprehensive site selection process that was environmentally, technically, and planning-led to avoid and minimise the potential impacts of the Scheme as early as possible. **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** explains that the design and layout, and extent, of the Scheme has been subject to an iterative process involving the developer, the design team and Project Principles, the environmental consultant team and is informed by feedback from statutory consultees, host authorities and local communities through the scoping and consultation process. This process has resulted in the delivery of a functional and efficient Scheme design which will deliver a large amount of renewable and low carbon electricity using solar PV arrays.

			This delivery is achieved whilst ensuring the design remains sensitive to the local context and surrounding area within which the Scheme is located. The Scheme has sought to avoid and minimise impacts on the environment as far as practicable. The **Design Approach Document [APP/5.7]** demonstrates how the design of the Scheme has been developed in accordance with a clear design framework, based on the criteria for good design set out in NPS EN-1. 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). The **Works Plan [APP/2.3]** and the **Design Principles, Parameters and Commitments [APP/5.8]** secure the design of the Scheme through the **draft DCO [APP/3.1]**
	2.10.61 For a solar farm to generate electricity efficiently the panel array spacing should seek to maximise the potential power output of the site. The type, spacing and aspect of panel arrays will depend on the physical characteristics of the site such as site elevation.	2.10.53 For a solar farm to generate electricity efficiently the panel array spacing should seek to maximise the potential power output of the site. The type, spacing and aspect of panel arrays will depend on the physical characteristics of the site such as site elevation.	As set out in **ES Chapter 5: The Scheme [APP/6.1],** each PV Panel would be mounted on a metal rack, known as a Mounting Structure. The Applicant retains flexibility in the use of Tracker Solar PV Tables or Fixed Solar PV Tables for the Scheme. The Tracking Panels would be aligned in north-south rows and would rotate to the east and west to maximise output, whereas the Fixed Panels would be aligned in eastwest rows and secured to fixed south facing Solar PV Tables. As set out in **ES Chapter 5: The Scheme [APP/6.1],** a tracker system involves attaching the Solar PV Panels to a motorised table that can move in relation to the sun. This allows for optimal power generation throughout the day. The Scheme would utilise a single-axis tracker system, which tilts the Solar PV Panels around a horizontal north-south axis, thus tracking the movement of the sun from east to west. Fixed south facing Solar PV Panels are the most common approach for ground mounted solar PV facilities in the UK to date and involve installing Solar PV Panels to fixed tables, arranged in rows facing south. Fixed south-facing Solar PV Panels may be utilised when mental constraints prevent the use of Tracking Solar PV Panels.
	2.10.62 In terms of design and layout, applicants may favour a south-facing arrangement of panels to maximise output although other orientations may be chosen. For example, an east-west layout, whilst likely to result in reduced output compared to south-facing panels on a panel-by-panel basis, may allow for a greater density of panels to compensate and therefore for generation to be spread more evenly throughout the day.	2.10.54 In terms of design and layout, applicants may favour a south facing arrangement of panels to maximise output although other orientations may be chosen. For example, an east-west layout, whilst likely to result in reduced output compared to south-facing panels on a panel-by-panel basis, may allow for a greater density of panels to compensate and therefore for generation to be spread more evenly throughout the day.	
	2.10.63 It is likely that underground and overhead cabling will be required to connect the electrical assets of the site, such as from the substation to the panel arrays or storage facilities.	2.10.55 It is likely that underground and overhead cabling will be required to connect the electrical assets of the site, such as from the substation to the panel arrays or storage facilities.	**ES Chapter 5: The Scheme [APP/6.1]** describes the works required for the Scheme. Works that include cabling are: • Work No.1 for the solar photovoltaic generating station contained within the Solar PV Site, comprising an area of approximately 608ha, to include the Conversion Units / 33kV Sub-distribution Switch Rooms, and the cabling between these elements and the Customer Substation • Work No.3 for the works in connection with the Customer Substation located within Field 27, including access and temporary construction compounds, and cabling between Work No. 3 and Work No. 4; and • Work No.5 for the Grid Connection Infrastructure, including a diversion and potential decommissioning of the existing 400kV overhead line, removal of old pylons (if required) and installation of new pylons, including works to lay electrical cables, access, and temporary construction laydown areas for electrical cables.
	2.10.64 In the case of underground cabling, applicants are expected to provide a method statement describing cable trench design, installation methodology, as well as details of the operation and maintenance regime.	2.10.56 In the case of underground cabling, applicants are expected to provide a method statement describing cable trench design, installation methodology, as well as details of the operation and maintenance regime.	

			The **Design Principles and Parameters Document [APP/5.8]** sets out further detail on the cable design and installation for each of the works areas listed in Schedule 1 of the **draft DCO [APP/3.1].** The Scheme allows for necessary spatial flexibility in the routing of the Interconnecting Cables. The working area for installation of the Interconnecting Cables is anticipated to be 25m sited within a typical 50m corridor. This will be widened or narrowed in places to accommodate required operations (such as the crossing of watercourses, roads, utilities etc.) and to minimise removal of hedgerows. The open cut cable trench would be up to approximately 7m wide. This includes separation distances where multiple cables are running in parallel. The trench depth would be up to 2m deep.
Technical Considerations – Project Lifetime	2.10.65 Applicants should consider the design life of solar panel efficiency over time when determining the period for which consent is required. An upper limit of 40 years is typical, although applicants may seek consent without a time-period or for differing time-periods of operation.	2.10.57 Applicants should consider the design life of solar panel efficiency over time when determining the period for which consent is required. An upper limit of 40 years is typical, although applicants may seek consent without a time-period or for differing time periods of operation.	Decommissioning is expected to take between 12 and 24 months, and for the purposes of the assessment, is expected to occur after the 60-year design life of the Scheme in 2093. A requirement to decommission the Scheme is secured via a requirement in the **draft DCO [APP/3.1]**.
	2.10.66 Time limited consent, where granted, is described as temporary because there is a finite period for which it exists, after which the project would cease to have consent and therefore must seek to extend the period of consent or be decommissioned and removed.	2.10.58 Time limited consent, where granted, is described as temporary because there is a finite period for which it exists, after which the project would cease to have consent and therefore must seek to extend the period of consent or be decommissioned and removed.	
	2.10.67 Solar panel efficiency deteriorates over time and applicants may elect to replace panels during the lifetime of the site.	2.10.59 Solar panel efficiency deteriorates over time and applicants may elect to replace panels during the lifetime of the site.	**ES Chapter 5: The Scheme [APP/6.1]** sets out the anticipated replacement programme. During the anticipated 60-year operational life of the Scheme, it is expected that there will be a requirement for periodic replacement of some of the electrical infrastructure. It is not expected that an extensive replacement of all components will be required across the entirety of the Scheme during a single period; instead, the programme for replacing equipment across the Scheme is anticipated to be staged to maintain the electrical export to the National Grid. The following assumptions have been made for the programme of replacement activities: • It is expected that the operational life of PV Panels is 40 years or more, and that all the PV Panels will be replaced once during the operational phase. The PV Panels are anticipated to be replaced over a maximum 12 to 24-month period • It is expected that the BESS Containers could be replaced up to five times during the operational phase • Access to the Solar PV Site defined for construction would be used. If any abnormal loads are required for the replacement of equipment, consultation will be carried out, and approvals will be sought from the relevant local planning and highways authorities • Components such as Mounting Structures, cabling and the Customer Substation, National Grid Substation, and BESS Compound buildings are not anticipated to be replaced during the operational phase. No intrusive ground works are anticipated to replace the PV Panels or BESS Containers; and

			• It is anticipated that the Scheme will create 125 Full Time Equivalent employees, with a peak month requiring up to 360 construction workers on-site during the replacement activities; and • Transformers are assumed to have a design life of 30 years; transformers may require replacement once during the lifetime of the Scheme, although replacement will only be carried out if required for performance or health and safety reasons. Mitigation measures associated with the programme of replacement activities will be outlined within the **oOEMP [APP/7.8]**.
Technical Considerations – Decommissioning	2.10.68 Solar panels can be decommissioned relatively easily and cheaply. The nature and extent of decommissioning of a site can vary. Generally, it is expected that the panel arrays and mounting structures will be decommissioned, and underground cabling dug out to ensure that prior use of the site can continue	2.10.60 Solar panels can be decommissioned relatively easily and cheaply. The nature and extent of decommissioning of a site can vary. Generally, it is expected that the panel arrays and mounting structures will be decommissioned, and underground cabling dug out to ensure that prior use of the site can continue.	An **oDS [APP/7.10]** has been prepared and submitted with the DCO Application. This sets out the general principles to be followed in the decommissioning phase of the Scheme. The **draft DCO [APP/3.1]** includes a requirement that a detailed Decommissioning Strategy would be prepared substantially in accordance with the oDS and approved by Breckland Council at the time of decommissioning, in advance of the commencement of decommissioning works, and would include timescales and transportation methods. As outlined in the **ES Chapter 5: The Scheme [APP/6.1]**, upon completion of the operation and maintenance phase, the Solar PV Site will be decommissioned, and the land will be returned to the landowner. All PV Panels, Mounting Structures, above ground cabling (not including the Grid Connection Infrastructure), Conversion Units / 33kV Sub-distribution Switch Rooms, BESS Units and the Customer Substation would be removed from within the Solar PV Site and recycled or disposed of in accordance with good practice and market conditions at that time. Foundations and other below ground infrastructure will be cut to 1.2m below the surface to enable future ploughing. Any piles would be removed. The proposed National Grid Substation and the Grid Connection Infrastructure would remain in situ. Mitigation planting specifically required to support the location of the National Grid Substation, as identified on the **ES Figure 5.1: Concept Masterplan [APP/6.3],** would be handed over to National Grid, who would be responsible for its maintenance and management. Post-decommissioning, the landowners would choose how the land is to be used and managed. The landowner may return all of the land to agricultural use, although it is likely that established habitats, such as hedgerows and woodland, would be retained, given their potential benefits to agricultural land and the wider farming estate. Permissive paths would be removed during decommissioning, with the precise timing to be determined by the contractor(s) and communicated to Norfolk County Council in accordance with the **oDS [APP/7.10].**
	2.10.69 Applicants should set out what would be decommissioned and removed from the site at the end of the operational life of the generating station, considering instances where it may be less harmful for the ecology of the site to keep or retain certain types of infrastructure, for example underground cabling, and where there may be socio-economic benefits in retaining site infrastructure after the operational life, such as retaining pathways through the site or a site substation.	2.10.61 Applicants should set out what would be decommissioned and removed from the site at the end of the operational life of the generating station, considering instances where it may be less harmful for the ecology of the site to keep or retain certain types of infrastructure, for example underground cabling, and where there may be socio-economic benefits in retaining site infrastructure after the operational life, such as retaining pathways through the site or a site substation.	
Technical Considerations – Flexibility in the project details	2.10.70 In many cases, not all aspects of the proposal may have been settled in precise detail at the point of application. Such aspects may include: • the type, number and dimensions of the panels; • layout and spacing; • the type of inverter or transformer; and	2.10.70 In many cases, not all aspects of the proposal may have been settled in precise detail at the point of application. Such aspects may include: • the type, number and dimensions of the panels; • layout and spacing; • the type of inverter or transformer; and	The Applicant wishes to retain flexibility regarding the design detail of certain components of the Scheme. The extent of flexibility sought by the Applicant is described in **ES Chapter 5: The Scheme [APP/6.1]**. It is important to note that the exact design details of the Scheme cannot be confirmed until consent is granted and the construction tendering process for the design has been completed. The local planning authorities would be required to approve the detailed design in advance of works commencing, should development consent be granted. The detailed

	• whether storage will be installed (with the option to install further panels as a substitute).	• whether storage will be installed (with the option to install further panels as a substitute).	design must be approved by the relevant planning authority pursuant to the requirements in the **draft DCO [APP/3.1]** and must be in accordance with the **Works Plan [APP/2.3]**. To maintain flexibility in the design and layout at this stage in the process and ensure maximum effects are assessed in the EIA and considered by the Secretary of State, the Scheme has adopted the Rochdale Envelope approach, This involves specifying parameter ranges, including details of the maximum and where relevant minimum size (footprint, width, height), technology, and locations of the different elements of the Scheme where flexibility needs to be retained. The use of the Rochdale Envelope has therefore been adopted to ensure that the likely worst-case scenario is presented in the assessment of potential environmental effects from the Scheme. As set out in the **Statement of Need [APP/5.4]** degradation of solar panels may mean that panels need to be replaced during the operational life of solar schemes. Other than in instances of the premature failure of individual panels (which would likely be replaced under a warranted maintenance arrangement) panel replacement is likely to be guided by data gathered through monitoring panel performance throughout the life of the solar scheme. This may be carried out on a rolling or programmed basis subject to any parameters which defined the assessment of the solar scheme's impacts on the environment.
	2.10.71 Applicants should set out a range of options based on different panel numbers, types and layout, with and without storage.	2.10.63 Applicants should set out a range of options based on different panel numbers, types and layout, with and without storage.	
Impacts – Biodiversity, ecological, geological conservation and water management	2.10.76 The applicant's ecological assessments should identify any ecological risk from developing on the proposed site.	2.10.68 The applicant's ecological assessments should identify any ecological risk from developing on the proposed site.	**ES Chapter 7: Ecology and Biodiversity [APP/6.2]** describes the existing levels and assesses the anticipated ecology and biodiversity effects of the Scheme's construction, operational, and decommissioning. The chapter provides an assessment of potential effects on internationally, nationally and locally designated sites of ecological or geological importance, on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats. **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse ecology and biodiversity related effects expected across the Scheme's construction, operational and decommissioning phases. As a result of embedded and additional mitigation and enhancement measures, there are four direct residual significant (in EIA terms) beneficial effects as a result of the Scheme, which are anticipated in relation to the following ecological features: hedgerows and lines of trees; breeding birds – other species; overwintering birds and amphibians – Great Crested Newt. The expected residual beneficial effects outlined in **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** rely on controls established in the **oCEMP [APP/7.6]**, **oOEMP [APP/7.8]**, **oDS [APP/7.10]** and the **oLEMP [APP/7.11]** and are secured via corresponding requirements of the **draft DCO [APP/3.1]**.
	2.10.77 Issues that need assessment may include habitats, ground nesting birds, wintering and migratory birds, bats, dormice, reptiles, great crested newts, water voles and badgers.	2.10.69 Issues that need assessment may include habitats, ground nesting birds, wintering and migratory birds, bats, dormice, reptiles, great crested newts, water voles and badgers.	
	2.10.78 The applicant should use an advising ecologist during the design process to ensure that adverse impacts are avoided, minimised or mitigated in line with the mitigation hierarchy, and biodiversity enhancements are maximised.	2.10.70 The applicant should use an advising ecologist during the design process to ensure that adverse impacts are avoided, minimised or mitigated in line with the mitigation hierarchy, and biodiversity enhancements are maximised.	This Ecology and Biodiversity chapter has been prepared by Aspect Ecology Ltd (see **ES Appendix 1.1: Statement of Competence [APP/6.4]**) to ensure that adverse impacts are avoided, minimised or mitigated in line with the mitigation hierarchy, and biodiversity enhancements are maximised.
	2.10.79 The assessment may be informed by a 'desk study' of existing ecological records, an evaluation of the likely impacts of the solar farm upon ecological features, and should	2.10.71 The assessment may be informed by a 'desk study' of existing ecological records, an evaluation of the likely impacts of the solar farm upon ecological features, and should	**ES Chapter 7: Ecology and Biodiversity [APP/6.2]** describes the existing levels and assesses the anticipated ecology and biodiversity effects of the Scheme's construction, operational, and decommissioning and is supported by extensive survey work to confirm the ecological habitats and species likely to be affected by the Scheme including:

	specify mitigation to avoid or minimise these impacts, and any further surveys required.	specify mitigation to avoid or minimise these impacts, and any further surveys required.	• **Appendix 7.1: Consultation and Legislation, Planning Policy and Guidance** • **Appendix 7.2: Baseline Ecological Survey Report** • **Appendix 7.3: Proposed Ground Nesting Bird Mitigation Strategy; and** • **Appendix 7.4: Confidential Badger Survey [APP/6.4].** The expected residual beneficial effects outlined in **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** rely on controls established in the **oCEMP [APP/7.6]**, **oOEMP [APP/7.8]**, **oDS [APP/7.10]** and the **oLEMP [APP/7.11]** and are secured via corresponding requirements of the **draft DCO [APP/3.1]**.
	2.10.80 Applicants should consider earthworks associated with construction compounds, access roads and cable trenching.	2.10.72 Applicants should consider earthworks associated with construction compounds, access roads and cable trenching.	**ES Chapter 5: The Scheme [APP/6.1]** describes the works required for the Scheme. Work No. 6 includes works associated with the Solar PV Site, which includes earthworks. The Scheme also includes associated development in connection with Work No. 1 to 11 including, but not limited to, earthworks and excavations.
	2.10.81 Where soil stripping occurs, topsoil and subsoil should be stripped, stored, and replaced separately to minimise soil damage and to provide optimal conditions for site restoration. Further details on minimising impacts on soil and soil handling are above at paragraphs 2.10.33 and 2.10.34.	2.10.73 Where soil stripping occurs, topsoil and subsoil should be stripped, stored, and replaced separately to minimise soil damage and to provide optimal conditions for site restoration. Further details on minimising impacts on soil and soil handling are above at paragraphs 2.10.25 and 2.10.26.	An **oSMP [APP/7.13]** has been submitted with this application and includes: • Details of relevant guidance relating to soil resources and their management • Relevant background information, including climate, geology, altitude, topography, soil type and land use, and descriptions of the soil resources identified in the survey work undertaken across the Scheme • Appropriate soils handling methods for stripping, stockpiling and reinstatement of soils; and • Monitoring procedures. Section 4 of the **oSMP [APP/7.13]** sets out the measures for soil disturbance and handling, including the measures for soil stripping. The **oSMP [APP/7.13]** is secured via a requirement of the **draft DCO [APP/3.1].**
	2.10.82 Applicants should consider how security and lighting installations may impact on the local ecology. Where pole mounted CCTV facilities are proposed the location of these facilities should be carefully considered to minimise impact. If lighting is necessary, it should be minimised and directed away from areas of likely habitat.	2.10.74 Applicants should consider how security and lighting installations may impact on the local ecology. Where pole mounted CCTV facilities are proposed the location of these facilities should be carefully considered to minimise impact. If lighting is necessary, it should be minimised and directed away from areas of likely habitat.	**ES Chapter 5: The Scheme [APP/6.1]** sets out that pole mounted internal facing closed circuit television (CCTV) systems installed at a height of up to 3m will be deployed around the perimeter of the Site. The CCTV cameras would use night-vision technology, which would be monitored remotely and avoid the need for night-time lighting of the Solar PV Site, as secured through the **Design Principles, Parameters and Commitments [APP/5.8]**. Section 7.7 of **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** outlines the mitigation measures relevant to biodiversity that are embedded in the Scheme, including but not limited to measures to prevent the accidental killing and injury of mammals, such as hedgehogs, which will be implemented during the construction and decommissioning phases. The Scheme includes measures to ensure that potential effects on light-sensitive species such as bats are fully mitigated.
	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	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	The **ES [APP/6.1 – 6.5]** takes account of all works boundaries and hedgerows. Buffers to woodland and hedgerows are included, and proposals for fencing incorporate features to enable the movement of mammals, reptiles and other fauna. These are outlined in **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** and secured through the **Design Principles, Parameters, and Commitments [APP/5.8].**

	and other fauna access into the site if required to do so in the ecological report.	and other fauna access into the site if required to do so in the ecological report.	
	2.10.84 Where a Flood Risk Assessment has been carried out this must be submitted alongside the applicant's ES. This will need to consider the impact of drainage. As solar PV panels will drain to the existing ground, the impact will not, in general, be significant.	2.10.76 Where a Flood Risk Assessment has been carried out this must be submitted alongside the applicant's ES. This will need to consider the impact of drainage. As solar PV panels will drain to the existing ground, the impact will not, in general, be significant.	The DCO Application is supported by **ES Appendix 12.2: FRA [APP/6.4]** which considers flood risk throughout each stage of development, potential sources of flooding, and assesses the risk of flooding to the Scheme. It concludes that flood risk from all sources to the Scheme is negligible to low and embedded mitigation has been incorporated into the Scheme design to increase its flood resilience**.**
	2.10.85 Where access tracks need to be provided, permeable tracks should be used, and localised Sustainable Drainage Systems (SuDS), such as swales and infiltration trenches, should be used to control any run-off where recommended.	2.10.77 Where access tracks need to be provided, permeable tracks should be used, and localised Sustainable Drainage Systems (SuDS), such as swales and infiltration trenches, should be used to control any run-off where recommended.	As set out in the **FRA [APP/6.4],** surface water runoff from the Solar PV will be managed through Rural SuDS and Natural Flood Management techniques such as grassland/wildflower, which will act to bind soils, slow surface water and increase water quality compared to the baseline scenario. The **FRA [APP/6.4]** includes a Surface Water Drainage Strategy, which sets out how surface water runoff from the Site will be managed in line with the national, regional and local requirements regarding flood risk and drainage. As the Scheme does not have a detailed layout, a detailed drainage strategy cannot be provided at this stage, with the principles and design criteria presentd in this document. These criteria will be applied at the detailed design phase and the detailed a Surface Water Drainage Strategy (which will form part of a detailed CEMP(s)) will include details of pre-construction, construction, and post-construction water quality monitoring. These measures are set out in the **oCEMP [APP/7.6]** submitted with the DCO Application.
	2.10.86 Given the temporary nature of solar PV farms, sites should be configured or selected to avoid the need to impact on existing drainage systems and watercourses.	2.10.78 Given the temporary nature of solar PV farms, sites should be configured or selected to avoid the need to impact on existing drainage systems and watercourses.	**ES Chapter 12: Water Resources [APP/6.2]** assess the impacts of the Scheme on water quality, water bodies or protected areas, and concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse water effects expected across the Scheme's construction, operational and decommissioning phases on water quality, water bodies or protected areas. The residual effects outlined in the assessment rely on controls established within the **oCEMP [APP/7.6], oOEMP [APP/7.8], the FRA [APP/6.4]** and **the oDS [APP/7.10].** These outline management plans and the Surface Water Drainage Strategy, which is embedded in the **FRA [APP/6.4]**, set out the water-related measures to manage any potential water effects that may arise from the Scheme's construction, operational and decommissioning phases. A Surface Water Drainage Strategy (which will form part of a detailed CEMP(s)) will include details of pre-construction, construction, and post-construction water quality monitoring. These measures are set out in the **oCEMP [APP/7.6]** submitted with the DCO Application. As set out in the **Design Principles, Parameters and Commitments [APP/5.8],** ditches have been buffered to 10m. **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** describes the consideration of reasonable alternatives carried out by the Applicant in relation to the Site for the Scheme, layouts and choice of technology. It is supported by **Appendix 1: Site Evaluation Report** to this **Planning Statement**, which provides an appraisal of alternative sites and demonstrates consideration of relevant policy and its applicability to the site evaluation process undertaken by the Applicant. The Site evaluation involved a number of factors, including, but not limited to accessibility such as the suitability of the access routes both during construction and operation.
	2.10.87 Culverting existing watercourses/drainage ditches should be avoided.	2.10.79 Culverting existing watercourses/drainage ditches should be avoided.	
	2.10.88 Where culverting for access is unavoidable, applicants should demonstrate that no reasonable alternatives exist and where necessary it will only be in place temporarily for the construction period.	2.10.80 Where culverting for access is unavoidable, applicants should demonstrate that no reasonable alternatives exist and where necessary it will only be in place temporarily for the construction period.	

	2.10.89 Solar farms have the potential to increase the biodiversity value of a site, especially if the land was previously intensively managed. In some instances, this can result in significant benefits and enhancements beyond Biodiversity Net Gain, which result in wider environmental gains which is encouraged	2.10.81 Solar farms have the potential to increase the biodiversity value of a site, especially if the land was previously intensively managed. In some instances, this can result in significant benefits and enhancements beyond biodiversity net gain, which result in wider environmental gains which is encouraged.	As presented in the **Biodiversity Net Gain Assessment Report [APP/7.4],** the ecological mitigation and enhancement areas will deliver a net gain of 23.46% for onsite habitats, and a net gain of 58.78% for onsite hedgerow and tree lines while a requirement of the **draft DCO [APP/3.1]** commits to delivering a minimum net gain of 10% for onsite habitats, and a net gain of 10% for onsite hedgerow and tree lines.
	2.10.90 For projects in England, applicants should consider enhancement, management, and monitoring of biodiversity in line with the ambition set out in the Environmental Improvement Plan and any relevant measures and targets, including statutory targets set under the Environment Act or elsewhere.	2.10.82 For projects in England, applicants should consider enhancement, management, and monitoring of biodiversity in line with the ambition set out in the Environmental Improvement Plan and any relevant measures and targets, including statutory targets set under the Environment Act 2021 or elsewhere.	
Impacts – Landscape, Visual and residential amenity	2.10.93 Generic landscape and visual impacts are covered in Section 5.10 of EN-1.	2.10.85 Generic landscape and visual impacts are covered in Section 5.10 of EN-1.	**ES Chapter 6: Landscape and Visual [APP/6.2]** provides an assessment of the Scheme's impact on landscape and visual within the Order Limits, or that will be impacted by the Scheme. **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** describes the consideration of reasonable alternatives carried out by the Applicant in relation to the Site for the Scheme, layouts and choice of technology. It is supported by **Appendix 1: Site Evaluation Report** to the **Planning Statement [APP/5.5]**, which provides an appraisal of alternative sites and demonstrates consideration of relevant policy and its applicability to the site evaluation process undertaken by the Applicant. The Site evaluation involved a number of factors, including, but not limited to irradiance and site topography, such as a preference for south-facing aspect and/or flatter topography
	2.10.94 The approach to assessing cumulative landscape and visual impact of large-scale solar farms is likely to be the same as assessing other onshore energy infrastructure. Solar farms are likely to be in low lying areas of good exposure and as such may have a wider zone of visual influence than other types of onshore energy infrastructure.	2.10.86 The approach to assessing cumulative landscape and visual impact of large-scale solar farms is likely to be the same as assessing other onshore energy infrastructure. Solar farms are likely to be in low lying areas of good exposure and as such may have a wider zone of visual influence than other types of onshore energy infrastructure.	
	2.10.95 However, whilst it may be the case that the development covers a significant surface area, in the case of ground-mounted solar panels it should be noted that with effective screening and appropriate land topography, the area of a zone of visual influence could be appropriately minimised.	2.10.87 However, whilst it may be the case that the development covers a significant surface area, in the case of ground-mounted solar panels it should be noted that with effective screening and appropriate land topography, the area of a zone of visual influence could be appropriately minimised.	Section 6.7 of **ES Chapter 6: Landscape and Visual [APP/6.2]** outlines the embedded mitigation proposed for landscape and visual considerations, including, but not limited to, advanced planting, mature hedgerow retention, new woodland creation, hedgerow and tree planting, and the establishment of grassland/wildflower areas.
	2.10.96 Landscape and visual impacts should be considered carefully pre-application. Potential impacts on the statutory purposes of nationally designated landscapes should form a part of the pre-application process.	2.10.88 Landscape and visual impacts should be considered carefully pre-application. Potential impacts on the statutory purposes of nationally designated landscapes and their settings should form a part of the pre- application process.	**ES Chapter 3: Order limits and Context [APP/6.1]** confirms that the Order limits have been selected and designed to avoid designated areas. The Order limits is not covered by any statutory ecological designations, nor is it an ancient woodland. None of the land within the Order limits is covered by any statutory landscape designations, i.e. National Parks or National Landscapes.
	]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	2.10.89 Applicants should carry out a landscape and visual assessment (LVIA) and report it in the ES. Photomontage visualisations may be required to demonstrate the effects of a proposed solar farm, on sensitive or valued landscapes,	Photographs and visualisations have been included to support the descriptions of baseline views and visual effects in reference to the viewpoints, which have been agreed through consultation with the relevant local planning authority. A range of visualisations have been prepared in support of the LVIA within **ES Chapter 6: Landscape and Visual [APP/6.2]**. Photowire and visualisations are presented in:

	and any nearby residential areas or viewpoints	particularly designated landscapes, the setting of heritage assets and any nearby residential areas or viewpoints.	• **Figure 6.10: PP1-16 and PPa-g Winter Photograph Panels [APP/6.3]** • **Figure 6.11: PP1-16 and PPa-g Summer Photograph Panels [APP/6.3]** • **Figure 6.12: PM6, PM8, PM12 and PM14 Parameter Based Winter Photowires [APP/6.3]** • **Figure 6.13: PM6, PM8, PM12 and PM14 Parameter Based Summer Photowires [APP/6.3]** • **Figure 6.14: PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme [APP/6.3]; and** • **Figure 6.15: PM8, PM12 and PM14 Summer Photomontages - Illustrative Scheme [APP/6.3].**
	2.10.98 Applicants should follow the criteria for good design set out in Section 4.7 of EN-1 when developing projects and will be expected to direct considerable effort towards minimising the landscape and visual impact of solar PV arrays especially within nationally designated landscapes.	2.10.90 Applicants should follow the criteria for good design set out in Section 4.7 of EN-1 when developing projects and will be expected to direct considerable effort towards minimising the landscape and visual impact of solar PV arrays especially within nationally designated landscapes.	While the appearance of solar panels is largely determined by their function, the site layout, landscaping and access have all been designed to reflect principles of good design. Good design has been a key consideration from the outset. The Scheme has been an iterative process involving the developer, the design team and Project Principles, the environmental consultant team, including a LVIA, and is informed by feedback from statutory consultees, host authorities and local communities through the scoping and consultation process, as set out in section 2 of the **Planning Statement [APP/5.5]** and the **Design Approach Document [APP/5.7].** The Scheme's layout has been developed in response to policy requirements, published landscape character assessment and fieldwork analysis. The design mitigation has been embedded into the Scheme to minimise effects on landscape character and visual amenity as outlined in the **oLEMP [APP/7.11], oCEMP [APP/7.6], oOEMP [APP7.8],** and the **oDS [APP/7.10]** which would be secured via corresponding requirements of the **draft DCO [APP/3.1]**. At detailed design, there would be consideration of detailed elements of the Scheme, which are not included at this stage, which could be considered embedded mitigation measures.
	2.10.99 Whilst there is an acknowledged need to ensure solar PV installations are adequately secured, required security measures such as fencing should consider the need to minimise the impact on the landscape and visual impact (see paragraphs 2.10.46 – 2.10.48 above).	2.10.91 Whilst there is an acknowledged need to ensure solar PV installations are adequately secured, required security measures such as fencing should consider the need to minimise the impact on the landscape and visual impact (see paragraphs 2.10.46 – 2.10.48 of this NPS).	As described in **ES Chapter 5: The Scheme [APP/6.1]** to assist the assessment and ensure good design, scheme outcomes and Design Principles have been developed to guide (within the parameters) the size, type and colour of elements of the Scheme. **ES Chapter 5: The Scheme [APP/6.1]** sets out that during operation; a perimeter fence will enclose the operational area of the Scheme. A Deer fence will enclose the PV Arrays, whilst a Palisade fence will enclose the Conversion Units, 33kV Sub-distribution Switch Rooms, BESS, Customer Substation and National Grid Substation. The deer fence will be wooden or metal posts with a wire mesh up, as secured in the **Design Principles, Parameters and Commitments [APP/5.8]**. Whilst security fencing is likely to be dark green, grey or black the final details would be approved by the relevant planning authority pursuant to the relevant requirements in the **draft DCO [APP/3.1]**. The maximum height of the security fencing is 3m, as secured in the **Design Principles, Parameters and Commitments [APP/5.8]**.
	2.10.100 The applicant should consider as part of the design, layout, construction, and future maintenance plans how to protect and retain, wherever possible, the growth of vegetation on site boundaries, as well as the growth of existing hedges, established	2.10.92 The applicant should consider as part of the design, layout, construction, and future maintenance plans how to protect and retain, wherever possible, the growth of vegetation on site boundaries, as well as the growth of existing hedges, established	Landscape and ecological enhancements and mitigation measures for the Scheme are shown on **Appendix 1: Green Infrastructure Strategy Plans** to the **oLEMP [APP/7.11]**. Measures are secured in the **oLEMP [APP/7.11]** which provides a framework for the planting, management and monitoring of landscaping and ecological mitigation and enhancement habitats for the Scheme during the construction and operational phases.

	vegetation, including mature trees within boundaries. Applicants should also consider opportunities for individual trees within the boundaries to grow on to maturity.	vegetation, including mature trees within boundaries. Applicants should also consider opportunities for individual trees within the boundaries to grow on to maturity.	
	2.10.101 The impact of the proposed development on established trees and hedges should be informed by a tree survey and arboricultural/hedge assessment as appropriate.	2.10.93 The impact of the proposed development on established trees and hedges should be informed by a tree survey and arboricultural / hedge assessment as appropriate.	The ES is supported by extensive survey works which include **ES Appendix 16.4: Arboricultural Impact Assessment [APP/6.4].**
Impacts – Glint and Glare	2.10.103 Applicants should map receptors qualitatively to identify potential glint and glare issues and determine if a glint and glare assessment is necessary as part of the application.	2.10.95 Applicants should map receptors qualitatively to identify potential glint and glare issues and determine if a glint and glare assessment is necessary as part of the application.	As set out in **ES Appendix 2.1: EIA Scoping Opinion Request [APP/6.4]** and agreed by PINS in **ES Appendix 2.2: Scoping Opinion Response [APP/6.4],** an individual Glint and Glare chapter is not required in the ES. **ES Chapter 16: Other Environmental Matters [APP/6.2]** assess glint and glare effects in respect of those matters that are scoped in. The locations of relevant receptors are shown within the supporting **ES Appendix 16.2: Solar Photovoltaic Glint and Glare Study [APP/6.4].** **ES Chapter 16: Other Environmental Matters [APP/6.2]** concludes that, with embedded mitigation measures in place, there is no potential for significant glint and glare effects as a result of the Scheme's construction, operational and decommissioning phases. Embedded mitigation measures have been included in the **ES Appendix 16.2: Solar Photovoltaic Glint and Glare Study [APP/6.4]**. Advanced planting and hedgerow enhancement will be undertaken during winter 2025 and are to be completed during winter 2026 along the eastern boundary of the Site, as outlined in **Appendix 3: Advanced Planting Plan** of the **oLEMP [APP/7.11].**
	2.10.104 When a quantitative glint and glare assessment is necessary, applicants are expected to consider the geometric possibility of glint and glare affecting nearby receptors, and provide an assessment of potential impact and impairment based on the angle and duration of incidence and the intensity of the reflection.	2.10.96 When a quantitative glint and glare assessment is necessary, applicants are expected to consider the geometric possibility of glint and glare affecting nearby receptors, and provide an assessment of potential impact and impairment based on the angle and duration of incidence and the intensity of the reflection.	
	2.10.105 The extent of reflectivity analysis required to assess potential impacts will depend on the specific project site and design. This may need to account for 'tracking' panels if they are proposed as these may cause differential diurnal and/or seasonal impacts.	2.10.97 The extent of reflectivity analysis required to assess potential impacts will depend on the specific project site and design. This may need to account for 'tracking' panels if they are proposed as these may cause differential diurnal and/or seasonal impacts.	Section 16.6, Glint and Glare, of **Chapter 16: Other Environmental Matters [APP/6.2]** considers both fixed and tracker panel options, as either type of panel may constitute the worst-case scenario.
	2.10.106 When a glint and glare assessment is undertaken, the potential for solar PV panels, frames and supports to have a combined reflective quality may need to be assessed, although the glint and glare of the frames and supports is likely to be significantly less than the panels.	2.10.98 When a glint and glare assessment is undertaken, the potential for solar PV panels, frames and supports to have a combined reflective quality may need to be assessed, although the glint and glare of the frames and supports is likely to be significantly less than the panels.	**ES Appendix 16.3: Solar Photovoltaic Glint and Glare Study [APP/6.4]** considered solar panels with a surface material of 'smooth glass' with an anti-reflective coating.
Impacts – Cultural Heritage	2.10.107 The impacts of solar PV developments on the historic environment will require expert assessment in most cases and may have effect both above and below ground.	2.10.99 The impacts of solar PV developments on the historic environment will require expert assessment in most cases and may have effect both above and below ground.	**ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** provides an assessment of the Scheme's impact on the historic environment, both above and below ground assets, within the Order Limits, or that will be impacted by the Scheme. **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms)

	2.10.108 Above ground impacts may include the effects on the setting of Listed Buildings and other designated heritage assets as well as on Historic Landscape Character.	2.10.100 Above ground impacts may include the effects on the setting of Listed Buildings and other designated heritage assets as well as on Historic Landscape Character.	residual adverse heritage related effects expected across the Scheme's construction, operational and decommissioning phases. The embedded and additional mitigation measures are documented within the: **oCEMP [APP/7.6], oCTMP [APP/7.7], oOEMP [APP/7.8], oDS [APP/7.10],** and **oLEMP [APP/7.11]** and are secured via requirements of the **draft DCO [APP/3.1].**
	2.10.109 Below ground impacts, although generally limited, may include direct impacts on archaeological deposits through ground disturbance associated with trenching, cabling, foundations, fencing, temporary haul routes etc.	2.10.101 Below ground impacts, although generally limited, may include direct impacts on archaeological deposits through ground disturbance associated with trenching, cabling, foundations, fencing, temporary haul routes etc.	
	2.10.110 Equally, solar PV developments may have a positive effect, for example archaeological assets may be protected by a solar PV farm as the site is removed from regular ploughing and shoes or low-level piling is stipulated.	2.10.102 Equally, solar PV developments may have a positive effect, for example archaeological assets may be protected by a solar PV farm as the site is removed from regular ploughing and shoes or low-level piling is stipulated.	Section 8.8 of **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** sets out that if the Scheme were not to proceed, the archaeological remains within the Site would continue to deteriorate as a result of truncation from ploughing; therefore the Scheme will have a positive effect.
	2.10.112 Applicant assessments should be informed by information from Historic Environment Records (HERs) or the local authority.	2.10.104 Applicant assessments should be informed by information from Historic Environment Records (HERs) or the local authority.	**ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** provides an assessment of the Scheme's impact on the historic environment, both above and below ground assets, within the Order Limits, or that will be impacted by the Proposed Development and has been informed by the HER.
	2.10.113 Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, the applicant should submit an appropriate desk-based assessment and, where necessary, a field evaluation. These should be carried out using expertise where necessary and in consultation with the local planning authority, and should identify archaeological study areas and propose appropriate schemes of investigation, and design measures, to ensure the protection of relevant heritage assets.	2.10.105 Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, the applicant should submit an appropriate desk-based assessment and, where necessary, a field evaluation. These should be carried out using expertise where necessary and in consultation with the local planning authority, and should identify archaeological study areas and propose appropriate schemes of investigation, and design measures, to ensure the protection of relevant heritage assets.	Section 8.6 of **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** sets out the existing cultural heritage baseline conditions. The full details of the baseline conditions are presented in the chapter, established from the following appendices, which include field work and investigative work, are presented in **ES Volume 4 [APP/6.4]:** • **Appendix 8.1: Consultation and Legislation, Planning Policy and Guidance** • **Appendix 8.2: Historic England National Heritage List - Designated Heritage Assets** • **Appendix 8.3: Archaeological Desk-Based Assessment** • **Appendix 8.4: Geophysical Survey Report** • **Appendix 8.5: Air Photo Services Report** • **Appendix 8.6: Archaeological Trial Trenching Report**; and • **Appendix 8.7: outline Archaeological Mitigation Strategy**.
	2.10.114 In some instances, field studies may include investigative work (and may include trial trenching beyond the boundary of the proposed site) to assess the impacts of any ground disturbance, such as proposed cabling, substation foundations or mounting supports for solar panels on archaeological assets.	2.10.106 In some instances, field studies may include investigative work (and may include trial trenching beyond the boundary of the proposed site) to assess the impacts of any ground disturbance, such as proposed cabling, substation foundations or mounting supports for solar panels on archaeological assets.	
	2.10.115 The extent of investigative work should be proportionate to the sensitivity of, and extent of, proposed ground disturbance in the associated study area.	2.10.107 The extent of investigative work should be proportionate to the sensitivity of, and extent of, proposed ground disturbance in the associated study area.	

	2.10.116 Applicants should take account of the results of historic environment assessments in their design proposal.	2.10.108 Applicants should take account of the results of historic environment assessments in their design proposal.	As detailed in Section 2 of the **Planning Statement [APP/5.5]**, good design has been a fundamental consideration from the outset of the Scheme. The **Design Approach Document [APP/5.6]** illustrates how the design of the Scheme has been developed in accordance with a clear design framework, based on the criteria for good design outlined in NPS EN-1. This has included the adoption of project level design principles (Project Principles) to guide decision making and embed good design outcomes to the Scheme. Throughout the design process, the Applicant maintained an interdisciplinary approach to design, considering 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). Project Principles include Principle 2.5, which respects the setting of heritage assets along the Nar Valley, and Principle 2.6, which protects and supports engagement and understanding of local heritage assets. **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** provides an assessment of the Scheme's impact on the historic environment, both above and below ground assets, within the Order Limits, or that will be impacted by the Scheme. **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse heritage related effects expected across the Scheme's construction, operational and decommissioning phases. The embedded and additional mitigation measures are documented within the: **oCEMP [APP/7.6], oCTMP [APP/7.7], oOEMP [APP/7.8], oDS [APP/7.10],** and **oLEMP [APP/7.11]** and are secured via requirements of the **draft DCO [APP/3.1].**
	2.10.117 Applicants should consider what steps can be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting.	2.10.109 Applicants should consider what steps can be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting.	
	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.	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.	
	2.10.119 Applicants may need to include visualisations to demonstrate the effects of a proposed solar farm on the setting of heritage assets.	2.10.111 Applicants may need to include visualisations to demonstrate the effects of a proposed solar farm on the setting of heritage assets.	Photographs and visualisations have been included to support the descriptions of baseline views and visual effects in reference to the viewpoints, which were agreed upon through consultation with the relevant local planning authority. A range of visualisations have been prepared in support of the LVIA within **ES Chapter 6: Landscape and Visual [APP/6.2]**. Photowire and visualisations are presented in: • **Figure 6.10: PP1-16 and PPa-g Winter Photograph Panels [APP/6.3]** • **Figure 6.11: PP1-16 and PPa-g Summer Photograph Panels [APP/6.3]** • **Figure 6.12: PM6, PM8, PM12 and PM14 Parameter Based Winter Photowires [APP/6.3]** • **Figure 6.13: PM6, PM8, PM12 and PM14 Parameter Based Summer Photowires [APP/6.3]** • **Figure 6.14: PM8, PM12 and PM14 Winter Photomontages - Illustrative Scheme [APP/6.3]; and** • **Figure 6.15: PM8, PM12 and PM14 Summer Photomontages - Illustrative Scheme [APP/6.3].**
Impacts – Construction including traffic	2.10.120 Modern solar farms are large sites that are mainly comprised of small structures that can be transported separately and constructed on-site, with developers designating a compound on-site for the	2.10.112 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	Section 4 of the **oCTMP [APP/7.7]** sets out the construction vehicle routing, the agreed routing for vehicles is as agreed with NCC and NH. It is proposed that all construction vehicles and HGVs access the Scheme from the A47, which is part of the Strategic Road Network (SRN) to the south, where possible, then travel along the A1065 before entering via the relevant access point onto the A1065. These routes provide the shortest distance

and transport noise and vibration	delivery and assemblage of the necessary components.	delivery and assemblage of the necessary components.	between various access points associated with the Scheme and SRN (A47) to prevent travel on unsuitable roads as well as avoid material harm. The suitability of the road access routes for use during both construction and operational vehicular access arrangements for the Scheme is presented in Section 3.2 of **ES Appendix 9.1: Traffic Assessment [APP/6.4].** The Traffic Assessment confirms the suitability of the access points serving the Site, as demonstrated in the **Access and Rights of Way Plan [APP/2.5]**. The Applicant's approach to EIA, including the use of the Rochdale envelope to assess effects, is set out in **ES Chapter 5: The Scheme [APP/6.1]** and **ES Chapter 3: EIA Process and Methodology [APP/6.1]**. With the need for flexibility in mind, the Applicant confirms that the ES has assessed the likely worst-case development scenario. Section 7.1 of the **oCTMP [APP/7.7]** sets out the nature of Abnormal Indivisible Loads (AIL) associated with the construction of the Scheme, and Section 7.2 highlights that the Applicant expects there to be less than 10 AIL deliveries during the construction programme. Section 7.3 sets out the following measures for managing the AIL vehicles: • Application for notification of AIL deliveries through the Electronic Service Delivery for Abnormal Loads (ESDAL2) system • Where the system is not used, an application for AIL movement must be submitted with adequate time for consultation, planning and further notification; and • Advance notice through ESDAL2 if escorts or assistance from the emergency services are required. The cumulative transport and access effects of the Scheme and High Grove Solar is set out in Section 9.11 of **ES Chapter 9: Transport and Access [APP/6.2].** Paragraph 9.11.8 notes that all cumulative traffic flows associated with cumulative schemes, including High Grove Solar, are already inherently accounted for within the TEM Pro growth factors which were utilised in Section 9.6 to generate the future baseline 2031 traffic flow scenario. Paragraph 9.11.9 then states that there are no relevant cumulative schemes for the Operational Phase, and that any cumulative schemes relevant to the Decommissioning Phase are assumed to be mitigated through the embedded mitigation and management plans included in the **oDS [APP/7.10]**.
	2.10.121 Many solar farms will be sited in areas served by a minor road network. Public perception of the construction phase of solar farms will derive mainly from the effects of traffic movements, which is likely to involve smaller vehicles than typical onshore energy infrastructure but may be more voluminous.	2.10.113 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.	
	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.	2.10.115 Applicants should assess the various potential routes to the site for delivery of materials and components where the source of the materials is known at the time of the application, and select the route that is the most appropriate.	
	2.10.124 Where the exact location of the source of construction materials, such as crushed stone or concrete is not be known at the time of the application, applicants should assess the worst-case impact of additional vehicles on the likely potential routes.	2.10.116 Where the exact location of the source of construction materials, such as crushed stone or concrete is not known at the time of the application, applicants should assess the worst-case impact of additional vehicles on the likely potential routes.	Section 4.1 of the **oCTMP [APP/7.7]** states that, subject to the procurement of materials, some deliveries may arrive/depart to the north via the A1065, which is also included in the routing strategy. This has been informed by the reasonable worst-case as set out in Section 9.4 of **ES Chapter 9: Transport and Access [AP/6.2]**.
	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.	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.	Permanent improvements will be made to assist with the movement of vehicles within the Site, as outlined within the supporting **ES Appendix 9.2: Traffic Assessment [APP/6.4]**, including the improvements to the geometry of the junctions onto the A1065 and internally. These improvements will be secured through the Order limits and **Access and Right of Way Plan [APP/2.5].** Section 7.3 of **the oCTMP [APP/7.7]** sets out the following measures for managing AIL: • Application for notification of AIL deliveries must be made by transport operators, preferably through the Electronic Service Delivery for Abnormal Loads (ESDAL2)

			system. If the ESDAL2 system is not used, an application for AIL movement must be submitted in adequate time to allow consultation, planning and further notification • Details of any future AIL deliveries will be confirmed by the respective contractor prior to the delivery; and • Where escorts or assistance is required, the respective contractor will ensure that the emergency services are notified well in advance, both through the ESDAL2 system and separate engagement, to ensure there is sufficient resourcing available to assist with the delivery.
	2.10.126 Where a cumulative impact is likely because multiple energy infrastructure developments are proposing to use a common port and/or access route and pass through the same towns and villages, applicants should include a cumulative transport assessment as part of the ES. This should consider the impacts of abnormal traffic movements relating to the project in question in combination with those from any other relevant development. Consultation with the relevant local highways authorities is likely to be necessary.	2.10.118 Where a cumulative impact is likely because multiple energy infrastructure developments are proposing to use a common port and/or access route and pass through the same towns and villages, applicants should include a vision-led transport assessment to manage cumulative impacts as part of the ES. This should consider the impacts of abnormal traffic movements relating to the project in question in combination with those from any other relevant development. Consultation with the relevant local highways authorities is likely to be necessary.	Section 9.11 of the **ES Chapter 9: Transport and Access [APP/6.2]** notes that all cumulative traffic flows associated with cumulative schemes, including High Grove Solar, are already inherently accounted for within the TEM Pro growth factors, which were utilised in Section 9.6 to generate the future baseline 2031 traffic flow scenario. Section 9.11 then states that there are no relevant cumulative schemes for the Operational Phase, and that any cumulative schemes relevant to the Decommissioning Phase are assumed to be mitigated through the embedded mitigation and management plans included in the **oDS [APP/7.10]**. Sections 7 of the **oCTMP [APP/7.7]** and the **oOTMP [APP/7.9]** outline how AILs will be managed to avoid disruption to the network. The key management method will be the use of the Electronic Service Delivery for Abnormal Loads (ESDAL2) system, and if not used then an application will be submitted to allow adequate time for consultation, planning and further notification.
Mitigations – Agriculture Land classification and land type	2.10.127 The Defra Construction code of practice for the sustainable use of soils on construction sites provides guidance on ensuring that damage to soil during construction is mitigated and minimised. Mitigation measures focus on minimising damage to soil that remains in place, and minimising damage to soil being excavated and stockpiled. The measures aim to preserve soil health and soil structure to minimise soil carbon loss and maintain water infiltration and soil biodiversity. Mitigation measures for agricultural soils include use of green cover, multispecies cover crops - especially during the winter minimising compaction and adding soil organic matter.	2.10.119 The Defra Construction code of practice for the sustainable use of soils on construction sites provides guidance on ensuring that damage to soil during construction is mitigated and minimised. Mitigation measures focus on minimising damage to soil that remains in place, and minimising damage to soil being excavated and stockpiled. The measures aim to preserve soil health and soil structure to minimise soil carbon loss and maintain water infiltration and soil biodiversity. Mitigation measures for agricultural soils include use of green cover, multispecies cover crops - especially during the winter - minimising compaction and adding soil organic matter. Mitigation of impacts to peat soils should include water table management and minimising soil disturbance.	Section 11.7 of **ES Chapter 11: Soils and Agriculture [APP/6.2]** sets out the following embedded mitigation to minimise damage to soil structure during the construction phase of the Scheme: • Minimising or avoiding vehicle movement over soils (trafficking) when soils are in a plastic, wet state • Only moving soils, which is only necessary for limited areas such as to build tracks, the BESS and substation areas, when soils are dry • For the small volumes of soils that need to be stored for subsequent restoration, placing them into storage bunds when they are dry, and managing and maintaining the bunds; and • Minimising trench widths, replacing soils in the reverse order and preventing any adverse long-term effects on land quality. Section 4.6 of the **oSMP [APP/7.13]** sets out the following good practice measures to avoid damage to soil structure: • Suitably qualified soil scientists will be appointed by the contractor to oversee and define all soil management good practice measures • Soil resources will be clearly identified (usually by texture and/or colour) to avoid mixing of topsoils with subsoils when excavating and filling the trenches • No trafficking of vehicles/plant or materials storage will occur on reinstated soil, wherever practicable • Disturbance to soils will be minimised at all stages; for example, avoiding unnecessary repeat movements over the same ground

			• The movement of vehicles and plant will be restricted to designated access and haul routes • Multiple handling of soils will be avoided • Soil handling, including tracking over the soil with machinery, will only take place in suitable soil moisture and weather conditions • Soils will only be stored in designated stockpiles • Long-term (over 6 months) stockpiles will be seeded to prevent wind and water erosion; and • Records of soil handling operations and stockpiles will be kept.
Mitigations – Biodiversity and ecological conservation	2.10.128 In England, proposed enhancements should take account of the above factors and as set out in Sections 4.6 and 5.4 of EN-1 aim to achieve environmental and biodiversity net gain in line with the ambition set out in the Environmental Improvement Plan and any relevant measures and targets, including statutory targets set under the Environment Act or elsewhere.	2.10.120 In England, proposed enhancements should take account of the above factors and as set out in Sections 4.6 and 5.4 of EN-1 aim to achieve environmental and biodiversity net gain in line with the ambition set out in the Environmental Improvement Plan and any relevant measures and targets, including statutory targets set under the Environment Act 2021 or elsewhere.	As presented in the **Biodiversity Net Gain Assessment Report [APP/7.4],** the ecological mitigation and enhancement areas will deliver a net gain of 23.46% for onsite habitats, and a net gain of 58.78% for onsite hedgerow and tree lines while a requirement of the **draft DCO [APP/3.1]** commits to delivering a minimum net gain of 10% for onsite habitats, and a net gain of 10% for onsite hedgerow and tree lines.
	2.10.129 This might include maintaining or extending existing habitats and potentially creating new important habitats, for example by installing cultivated strips/plots for rare arable plants, rough grassland margins, bumble bee plant mixes, and wild bird seed mixes.	2.10.121 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.	Maximising the restoration, creation, and enhancement of wider biodiversity has been key to the evolution of the Scheme's design. As set out in the **oLEMP [APP/7.11],** new habitats will be provided as part of the Scheme, with the aim of improving biodiversity gains, where this does not conflict with construction, operation and decommissioning functions of the Scheme. Examples of habitat creation and enhancement measures to be implemented as part of the Scheme include: • Creation of new grassland habitats, including wildflower grassland • The gapping up of hedgerows and Tree Lines with additional native species • Implementation of a rotational management strategy for hedgerows; and • The selective thinning and management of vegetation associated with ponds and ditches.
	2.10.130 Applicants are advised to develop an ecological monitoring programme to monitor impacts upon the flora of the site and upon any particular ecological receptors (such as bats and wintering birds). Results of the monitoring will then inform any changes needed to the land management of the site, including, if appropriate, any livestock grazing regime.	2.10.122 Applicants are advised to develop an ecological monitoring programme to monitor impacts upon the flora of the site and upon any particular ecological receptors (such as bats and wintering birds). Results of the monitoring will then inform any changes needed to the land management of the site, including, if appropriate, any livestock grazing regime.	Appropriate monitoring will be undertaken during construction, operation and decommissioning as set out and secured in the **oCEMP [APP/7.7]**, **oOEMP [APP/7.8]**, **oDS [APP/7.10]** and the **oLEMP [APP/7.11],** which are secured via corresponding requirements of the **draft DCO [APP/3.1]**.
Mitigations – Landscape, Visual and Residential Amenity	2.10.131 Applicants should consider the potential to mitigate landscape and visual impacts through, for example, screening with native hedges, trees and woodlands.	2.10.123 Applicants should consider the potential to mitigate landscape and visual impacts through, for example, screening with native hedges, trees and woodlands.	Section 6.7 of **ES Chapter 6: Landscape and Visual [APP/6.2]** outlines the embedded mitigation proposed for landscape and visual considerations, including, but not limited to, advanced planting, mature hedgerow retention, new woodland creation, hedgerow and tree planting, and the establishment of grassland/wildflower areas.

	2.10.132 Applicants should aim to minimise the use and height of security fencing. Where possible applicants should utilise existing features, such as hedges or landscaping, to assist in site security, or screen security fencing.	2.10.124 Applicants should aim to minimise the use and height of security fencing. Where possible applicants should utilise existing features, such as hedges or landscaping, to assist in site security, or screen security fencing.	**ES Chapter 5: The Scheme [APP/6.1]** sets out that during operation, a perimeter fence will enclose the operational area of the Scheme. A Deer fence will enclose the PV Arrays, whilst a Palisade fence will enclose the Conversion Units, 33kV Sub-distribution Switch Rooms, BESS, Customer Substation and National Grid Substation. The deer fence will be wooden or metal posts with a wire mesh up to 2.5m in height. Palisade fencing would be up to 3m in height, as secured in the **Design Principles, Parameters and Commitments [APP/5.8]**.
	2.10.133 Applicants should minimise the use of security lighting. Any lighting should utilise a passive infra-red (PIR) technology and should be designed and installed in a manner which minimises impact.	2.10.125 Applicants should minimise the use of security lighting. Any lighting should utilise a passive infra-red (PIR) technology and should be designed and installed in a manner which minimises impact.	**ES Chapter 5: The Scheme [APP/6.1]** sets out that pole mounted internal facing closed circuit television (CCTV) systems installed at a height of up to 3m will be deployed around the perimeter of the Site. The CCTV cameras would use night-vision technology, which would be monitored remotely and avoid the need for night-time lighting of the Solar PV Site, as secured in the **Design Principles, Parameters and Commitments [APP/5.8]**.
Mitigations – Glint and Glare	2.10.134 Applicants should consider using, and in some cases the Secretary of State may require, solar panels to comprise of (or be covered with) anti-glare/anti-reflective coating with a specified angle of maximum reflection attenuation for the lifetime of the permission.	2.10.126 Applicants should consider using, and in some cases the Secretary of State may require, solar panels to comprise of (or be covered with) anti-glare/anti-reflective coating with a specified angle of maximum reflection attenuation for the lifetime of the permission.	Section 16.6, Glint and Glare, of **Chapter 16: Other Environmental Matters [APP/6.2]** considers both fixed and tracker panel options, as either type of panel may constitute the worst-case scenario. The tracking panels would be aligned in north-south rows and would rotate to the east and west to maximise output, whereas the fixed panels would be aligned in eastwest rows and secured to fixed south facing Solar PV Tables. **ES Appendix 16.2: Solar Photovoltaic Glint and Glare Study [APP/6.4]** considered solar panels with a surface material of 'smooth glass with an anti-reflective coating. Fixed panels are assessed with an azimuth angle 180 degrees, south facing. **ES Chapter 16: Other Environmental Matters [APP/6.2]** concludes that, with embedded mitigation measures in place, there is no potential for significant glint and glare effects as a result of the Scheme's construction, operational and decommissioning phases. Embedded mitigation measures have been included in the **ES Appendix 16.2: Solar Photovoltaic Glint and Glare Study [APP/6.4]**. Advance planting and hedgerow enhancement will be undertaken during winter 2025 and is to be completed during winter 2026 along the eastern boundary of the Site, as secured in the **Appendix 3: Advanced Planting Plan** of the **oLEMP [APP/7.11].**
	2.10.135 Applicants may consider using screening between potentially affected receptors and the reflecting panels to mitigate the effects.	2.10.127 Applicants may consider using screening between potentially affected receptors and the reflecting panels to mitigate the effects.	
	2.10.136 Applicants may consider adjusting the azimuth alignment of, or changing the elevation tilt angle of, a solar panel within the economically viable range, to alter the angle of incidence. In practice this is unlikely to remove the potential impact altogether but in marginal cases may contribute to a mitigation strategy.	2.10.128 Applicants may consider adjusting the azimuth alignment of, or changing the elevation tilt angle of, a solar panel within the economically viable range, to alter the angle of incidence. In practice this is unlikely to remove the potential impact altogether but in marginal cases may contribute to a mitigation strategy.	
Mitigations – Cultural Heritage	2.10.137 The ability of the applicants to microsite specific elements of the proposed development during the construction phase should be an important consideration by the Secretary of State when assessing the risk of damage to archaeology.	2.10.129 The ability to microsite specific elements of the proposed development during the construction phase should be an important consideration by the Secretary of State when assessing the risk of damage to archaeology.	**Chapter 8: Cultural Heritage and Archaeology[APP/6.2]** concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse heritage related effects expected across the Scheme's construction, operational and decommissioning phases. The embedded and additional mitigation measures are documented within the: **oCEMP [APP/7.6], oCTMP [APP/7.7], oOEMP [APP/7.8], oDS [APP/7.10],** and **oLEMP [APP/7.11]** and are secured via requirements of the **draft DCO [APP/3.1].**
	2.10.138 Where requested by the applicant, the Secretary of State should consider granting consents which allow for the micrositing within a specified tolerance of elements of the permitted infrastructure, so that precise locations can be amended during the construction phase if unforeseen	2.10.130 Where requested by the applicant, the Secretary of State should consider granting consents which allow for the micrositing within a specified tolerance of elements of the permitted infrastructure, so that precise locations can be amended during the construction phase if unforeseen	As described in the **ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4]**, the need for and location of deep impacts (up to 12m for piles and/or directional drilling) are not yet known and so it is not possible to firmly identify the need for and location of any geoarchaeological assessment. Once details are available, the need for and scope of any geoarchaeological assessment will be agreed with Norfolk Historic Environment Service (NHES) and implemented in accordance with the AMS. The AMS will be secured via requirement of the **draft DCO [APP/3.1]**.

	circumstances, such as the discovery of previously unknown archaeology, arise.	circumstances, such as the discovery of previously unknown archaeology, arise.	The mitigation strategy is summarised is in **ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4].**
Mitigation – Construction including traffic and transport noise and vibration	2.10.139 In some cases, the local highway authority may request that the Secretary of State impose controls on the number of vehicle movements to and from the solar farm site in a specified period during its construction and, possibly, on the routeing of such movements particularly by heavy vehicles.	2.10.131 In some cases, the local highway authority may request that the Secretary of State impose controls on the number of vehicle movements to and from the solar farm site in a specified period during its construction and, possibly, on the routeing of such movements particularly by heavy vehicles.	Section 6 of the **oCTMP [APP/7.7]** sets out measures required to control any impacts from construction traffic, including AIL Routing, which is included in Section 7, and delivery routes and scheduling. Sections 6.1 to 6.3 set out the following measures: • Deliveries will be arranged to occur after 09:00 and before 17:00 • Car sharing, a shuttle bus service, and consolidation of deliveries will seek to reduce the number of vehicle trips; and • A Travel Plan (TP) will be implemented to encourage sustainable and active transport. The Applicant does not consider that any additional requirements need to be imposed by the Secretary of State on the Scheme.
	2.10.140 Where the Secretary of State agrees that this is necessary, requirements could be imposed on development consent.	2.10.132 Where the Secretary of State agrees that this is necessary, requirements could be imposed on development consent.	
	2.10.141 Where cumulative effects on the local road network or residential amenity are predicted from multiple solar farm developments, it may be appropriate for applicants for various projects to work together to ensure that the number of abnormal loads and deliveries are minimised, and the timings of deliveries are managed and coordinated to ensure that disruption to residents and other highway users is reasonably minimised.	2.10.133 Where cumulative effects on the local road network or residential amenity are predicted from multiple solar farm developments, it may be appropriate for applicants for various projects to work together to ensure that the number of abnormal loads and deliveries are minimised, and the timings of deliveries are managed and coordinated to ensure that disruption to residents and other highway users is reasonably minimised.	The cumulative transport and access effects of the Scheme is set out in Section 9.11 of **ES Chapter 9: Transport and Access [APP/6.2].** Cumulative traffic flows associated with cumulative schemes, including High Grove Solar, are already inherently accounted for within the TEM Pro growth factors, which were utilised in Section 9.6 to generate the future baseline 2031 traffic flow scenario. Given that the construction of High Grove is due to finish before the commencement of the Scheme, Section 9.11 of **ES Chapter 9: Transport and Access [APP/6.2]** sets out that there are unlikely to be any cumulative effects because of construction. There are no relevant cumulative schemes for the operational phase, and that any cumulative schemes relevant to the decommissioning phase are assumed to be mitigated through the embedded mitigation and management plans included in the **oDS [APP/7.10]**. Section 5.5 of the **oCTMP [APP/7.7]** sets out that deliveries and the movement of construction vehicles will be arranged to occur outside of network peak hours (after 09:00 and before 17:00). Guidance on AIL is provided in Section 7 of the **oCTMP [APP/7.7].**
	2.10.142 It may also be appropriate for the highway authority to set limits for, and coordinate these deliveries through, active management of the delivery schedules through the abnormal load approval process.	2.10.134 It may also be appropriate for the highway authority to set limits for, and coordinate these deliveries through, active management of the delivery schedules through the abnormal load approval process.	
	2.10.143 Once consent for a scheme has been granted, applicants should liaise with the relevant local highway authority (or other coordinating body) regarding the start of construction and the broad timing of deliveries. Applicants may need to agree a planning obligation to secure appropriate measures, including restoration of roads and verges.	2.10.135 Once consent for a scheme has been granted, applicants should liaise with the relevant local highway authority (or other coordinating body) regarding the start of construction and the broad timing of deliveries. Applicants may need to agree a planning obligation to secure appropriate measures, including restoration of roads and verges.	Liaison and agreement with Norfolk County Council (NCC) on transport and traffic mitigation is set out in Sections 4.1, 5.3, 5.9, 6.3, and 7.2 of the **oCTMP [APP/7.7]**, including the following: • Vehicle routing from the A47 to the A1065 • Temporary traffic management where access points cross the PRoW network or any permissive paths • Temporary speed limit changes, such as a temporary 40mph speed limit along the A1065 between the two construction access points • Measures within the Travel Plan; and • AIL movements. Section 5.5 of the **oCTMP [APP/7.7]** sets out the Delivery Management mitigation measures. Construction vehicles will avoid travel during the morning and evening network peak hours, where possible. Therefore, deliveries will be arranged to occur after 09:00 and before 17:00.
	2.10.144 Further, it may be appropriate for any non-permanent highway improvements carried out for the development (such as temporary road widening) to be made available for use by other subsequent solar farm developments.	2.10.136 Further, it may be appropriate for any non-permanent highway improvements carried out for the development (such as temporary road widening) to be made available for use by other subsequent solar farm developments.	

			ES Chapter 5: The Scheme [APP/6.1] sets out that the Scheme includes highways works such as improvements to road edges and temporary works to accommodate AIL deliveries. These works as are set out in Works 8A and 8B, and Works 4C and 5B as secured spatially in the **Works Plan [APP/2.3]**.
Secretary of State decision making -* Factors *influencing site selection and design – Agriculture land classification and land type	2.10.145 The Secretary of State should take into account the economic and other benefits of the best and most versatile agricultural land. The Secretary of State should ensure that the applicant has put forward appropriate mitigation measures to minimise impacts on soils or soil resources.	2.10.137 The Secretary of State should take into account the economic and other benefits of the best and most versatile agricultural land. The Secretary of State should ensure that the applicant has put forward appropriate mitigation measures to minimise impacts on soils or soil resources.	Section 11.8 of **ES Chapter 11: Soils and Agriculture [APP/6.2]** sets out that the economic benefits of the land within the Scheme are about £100,000 per annum, but this is negligible on a regional basis, which is not significant. Food production benefits are estimated at around 530 tonnes per annum incremental production benefit, which is negligible. Section 11.7 of **ES Chapter 11: Soils and Agriculture [APP/6.2]** sets out the following embedded mitigation during each phase of the lifetime of the Scheme to minimise damage to soil structure: • Construction phase o Minimising or avoiding vehicle movement over soils (trafficking) when soils are in a plastic, wet state o Only moving soils, which is only necessary for limited areas such as to build tracks, the BESS and substation areas, when the soils are dry o For the small volumes of soil that need to be stored for subsequent restoration, placing them into storage bunds when they are dry, and managing and maintaining the bunds; and o Minimising trench widths, replacing soils in the reverse order and preventing any adverse long-term effects on land quality. • Operation phase o Minimising travel over the land in vehicles when ground conditions are wet. • Decommissioning phase o Following the same timing principles as are applied at the construction phase.
Secretary of State decision making – Technical Considerations – Project lifetime and decommissioning	2.10.146 The Secretary of State should ensure that the applicant has put forward outline plans for decommissioning the generating station when no longer in use and restoring the land to a suitable use (taking into account paragraphs 2.10.68 and 2.10.69).	2.10.138 The Secretary of State should ensure that the applicant has put forward outline plans for decommissioning the generating station when no longer in use and restoring the land to a suitable use (taking into account paragraphs 2.10.68 and 2.10.69).	An **oDS [APP/7.10]** has been prepared and submitted with the DCO Application. This sets out the general principles to be followed in the decommissioning phase of the Scheme. The **Draft DCO [APP/3.1]** includes a requirement that a detailed Decommissioning Strategy would be prepared substantially in accordance with the **oDS** and approved by Breckland Council at that time of decommissioning, in advance of the commencement of decommissioning works, and would include timescales and transportation methods.
	2.10.147 Where the consent for a solar farm is to be time-limited, the DCO should impose a requirement setting that time-limit from the date the solar farm starts to generate electricity.	2.10.139 Where the consent for a solar farm is to be time-limited, the DCO should impose a requirement setting that time-limit from the date the solar farm starts to generate electricity.	Decommissioning is expected to take between 12 and 24 months, and for the purposes of the assessment, is expected to occur after the 60-year design life of the Scheme in 2093. A requirement to decommission the Scheme is secured via a requirement in the **Draft DCO [APP/3.1]**.
	2.10.148 Such a requirement should also secure the decommissioning of the generating station after the expiration of its permitted operation to ensure that inoperative plant is removed after its operational life.	2.10.140 Such a requirement should also secure the decommissioning of the generating station after the expiration of its permitted operation to ensure that inoperative plant is removed after its operational life.	

	2.10.149 An upper limit of 40 years is typical, although applicants may seek consent without a time period or for differing time-periods for operation.	2.10.141 An upper limit of 40 years is typical, although applicants may seek consent without a time period or for differing time-periods for operation.	
	2.10.150 The time limited nature of the solar farm, where a time limit is sought as a condition of consent, is likely to be an important consideration for the Secretary of State.	2.10.142 The time limited nature of the solar farm, where a time limit is sought as a condition of consent, is likely to be an important consideration for the Secretary of State.	
	2.10.151 The Secretary of State should consider the period of time the applicant is seeking to operate the generating station, as well as the extent to which the site will return to its original state, when assessing impacts such as landscape and visual effects and potential effects on the settings of heritage assets and nationally designated landscapes.	2.10.143 The Secretary of State should consider the period of time the applicant is seeking to operate the generating station, as well as the extent to which the site will return to its original state, when assessing impacts such as landscape and visual effects and potential effects on the settings of heritage assets and nationally designated landscapes.	As set out in the **ES Chapter 5: The Scheme [APP/6.1]**, when the operation and maintenance phase ends, the Solar PV Site would be decommissioned and the land returned to the landowner. All PV Panels, Mounting Structures, above ground cabling (not including the Grid Connection Infrastructure), Conversion Units / 33kV Sub-distribution Switch Rooms, BESS Units and the Customer Substation would be removed from within the Solar PV Site and recycled or disposed of in accordance with good practice and market conditions at that time. Foundations and other below ground infrastructure will be cut to 1.2m below the surface to enable future ploughing. Any piles would be removed. The National Grid Substation and the Grid Connection Infrastructure would remain in situ. Mitigation planting specifically required to support the location of the National Grid Substation, as identified on the **ES Figure 5.1: Concept Masterplan [APP/6.3]**, would be handed over to National Grid, who would be responsible for its maintenance and management. Post-decommissioning, the landowners would choose how the land is to be used and managed; the landowner may return all of the land to agricultural use, although it is likely that established habitats such as hedgerows and woodland would be retained, given their potential benefits to agricultural land and the wider farming estate. Permissive paths would be removed during decommissioning, with the precise timing to be determined by the contractor(s) and communicated to NCC in accordance with the **oDS [APP/7.10]**. The effects of decommissioning, which are often similar to, or of a lesser magnitude than, construction effects, are considered in **ES Topic Chapters (Chapter 6-16) [APP/6.2].**
Secretary of State decision making - Impacts – Biodiversity, ecological, geological conservation and water management	2.10.154 Water management is a critical component of site design for ground mount solar plants. Where previous management of the site has involved intensive agricultural practice, solar sites can deliver significant ecosystem services value in the form of drainage, flood attenuation, natural wetland habitat, and water quality management.	2.10.146 Water management is a critical component of site design for ground mount solar plants. Where previous management of the site has involved intensive agricultural practice, solar sites can deliver significant ecosystem services value in the form of drainage, flood attenuation, natural wetland habitat, and water quality management.	**ES Chapter 12: Water Resources [APP/6.2]** confirms that the entirety of the built aspects of the Scheme (Works No. 1-10) is situated in Flood Zone 1; only a small area of the Skylark Mitigation Works No. 11 (approximately 1.1 ha) is within the Flood Zone 2 and 3, which will continue to be used for agricultural activities; therefore, the Sequential Test is not triggered. **ES Chapter 12: Water Resources [APP/6.2]** assess the impacts of the Scheme on water quality, water bodies or protected areas, and concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse water effects expected across the Scheme's construction, operational and decommissioning phases on water quality, water bodies or protected areas. Embedded mitigation measures that have been incorporated into the Scheme's design for the construction phase include: • 10m watercourse edge buffers for all infrastructure works (i.e. Solar PV Site and Ancillary Infrastructure, Associated Development, and construction compounds) with the exception of watercourse crossings for cables and Access Tracks

			• 10m buffer of IDB maintained watercourses and marl pits • The Scheme will utilise existing access roads and agricultural tracks already in place where practicable, and this will help to minimise ground disturbance and requirements for further watercourse crossings; and • Watercourse crossings will take one of several forms depending on the nature of works, habitat sensitivity, and other environmental and technical design considerations. The **oCEMP [APP/7.6]** describes water management measures to control surface water runoff and drain hardstanding and other structures during the construction, operation and decommissioning of the Scheme. A Pollution Prevention Plan (PPP) will also form part of the CEMP. The following embedded mitigation measures have been incorporated into the Scheme design for the operational phase: • The BESS, Customer Substation, and National Grid Substation will be served by a SuDS network; and • Access Tracks will be served by trackside drainage ditches and will include check dams at regular intervals. The **ES Appendix 12.2: FRA [APP/6.4]** commits the Scheme to having dedicated contaminated water tanks with automated penstocks to prevent fire suppressant reaching the infiltration components of the SuDS network, in the rare event of a fire within Work Nos. 2, 3 or 4. An **oDS [APP/7.10]** has been prepared and the DCO includes a requirement for a DS to be prepared in advance of the commencement of decommissioning works. The DS will ensure that decommissioning is undertaken safely and with regard to the environmental legislation at the time of decommissioning, including relevant waste legislation. The residual effects outlined in the assessment rely on controls established within the **oCEMP [APP/7.6], oOEMP [APP/7.8],** the **FRA [APP/6.4]** and the **oDS [APP/7.10].** These outline management plans and the Surface Water Drainage Strategy, which is embedded in the **FRA [APP/6.4]** set out the water-related measures to manage any potential water effects that may arise from the Scheme's construction, operational and decommissioning phases. As set out in the **FRA [APP/6.4],** surface water runoff from the Solar PV will be managed through Rural SuDS and Natural Flood Management techniques such as grassland/wildflower, which will act to bind soils, slow surface water and increase water quality compared to the baseline scenario. The **FRA [APP/6.4]** includes a Surface Water Drainage Strategy, which sets out how surface water runoff from the Site will be managed in line with the national, regional and local requirements regarding flood risk and drainage. As the Scheme does not have a detailed layout, a detailed drainage strategy cannot be provided at this stage, with the principles and design criteria presented in this document. A Surface Water Drainage Strategy (which will form part of a detailed CEMP(s)) will include details of pre-construction, construction, and post-construction water quality monitoring. These measures are set out in the **oCEMP [APP/7.6]** submitted with the DCO Application.
	2.10.155 The Secretary of State must consider the worst-case effects in its consideration of the application and consent.	2.10.147 The Secretary of State must consider the worst-case effects in its consideration of the application and consent.	The impact assessment within **ES Topic Chapters [APP/6.2]** has been based on the worst-case parameters for each technical topic, and justification is presented within the relevant technical chapter.

Secretary of State decision making - Impacts – Landscape, visual and residential amenity	2.10.157 The Secretary of State will consider the landscape and visual impact of any proposed solar PV farm, taking account of any sensitive visual receptors, and the effect of the development on landscape character, together with the possible cumulative effect with any existing or proposed development. Nationally designated landscapes (National Parks, The Broads and Areas of Outstanding Beauty) are afforded extra protection due their statutory purpose. Development in these areas needs to satisfy policy as set out in EN-1 Section 5.10.	2.10.149 The Secretary of State will consider the landscape and visual impact of any proposed solar PV farm, taking account of any sensitive visual receptors, and the effect of the development on landscape character, together with the possible cumulative effect with any existing or proposed development. Nationally designated landscapes (National Parks, The Broads and National Landscapes) are afforded extra protection due their statutory purpose. Development in these areas needs to satisfy policy as set out in EN-1 Section 5.10.	**ES Chapter 6: Landscape and Visual [APP/6.2]** provides an assessment of the Scheme's impact on landscape and visual receptors, identifying construction, operational phases (short, medium, and long term), and decommissioning as the phases for assessment across the Scheme. **ES Chapter 6: Landscape and Visual [APP/6.2]** concludes the following significant residual adverse impacts: • D1: Swaffham Heath LCA: there are moderate adverse effects across all phases of the Scheme. • E6: North Pickenham Plateau LCA: there are moderate adverse effects across all phases of the Scheme. • VRG1: Central Site Area: there are major-moderate adverse effects across construction, decommissioning, and operational (short and medium term) phases of the Scheme. • VRG2: North-Eastern Site Area: there are major-moderate adverse effects across construction, decommissioning, and operational (short and medium term) phases of the Scheme. • VRG3: Nar Valley Southern Slope and Settlement Edge of South Acre: there are moderate adverse effects across construction, decommissioning, and operational (short term) phases of the Scheme. • The Peddars Way and Norfolk Coastal Path: there are moderate adverse effects across construction, decommissioning phases of the Scheme. • The Peddars Way and Norfolk Coastal Path, Over a limited extent only. Within and up to 300m from the Site: there are moderate adverse effects across the operational (short and medium term) phase of the Scheme. • Rebellion Way Cycle Route: there are moderate adverse effects across construction, decommissioning phases of the Scheme. • Rebellion Way Cycle Route, Over a limited extent only. Within the Site: there are moderate adverse effects across the operational (short and medium term) phase of the Scheme. The mitigation hierarchy has been applied throughout the design and development of the Scheme landscape and visual impacts have been minimised as far as practicable. The residual effects above cannot be mitigated further. Through the application of good design principles including the application of the mitigation hierarchy, a robust approach to secure good design would be achieved. Despite this approach, some significant residual visual effects would remain to two landscape receptors as summarised above. Paragraph 5.10.35 of NPS EN-1 confirms that "*The scale of energy projects means that they will often be visible across a very wide area. The Secretary of State should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project*." Section 6.11 of **ES Chapter 6: Landscape and Visual [APP/6.2]** describes the existing levels and assesses the anticipated cumulative landscape and visual effects of the Scheme's construction, operational (short, medium and long term), and decommissioning, in accordance with this policy. **ES Chapter 6: Landscape and Visual [APP/6.2]** concludes the following significant residual adverse cumulative impacts, cumulatively with High Grove Solar:

			• E6: North Pickenham Plateau LCA: there are significant adverse effects across all phases of the two developments. • VRG4: Great Palgrave and Little Palgrave: there are significant adverse effect for users of PRoW Sporle with Palgrave BR5 across the construction and decommissioning phases of the two developments. Whilst a number of significant residual effects are identified in **ES Chapter 6: Landscape and Visual [APP/6.2],** the Applicant confirms that the application of the mitigation hierarchy has been applied and demonstrated throughout the ES and DCO Application more widely. The Applicant is confident that all residual landscape impacts are those that cannot be avoided, reduced or mitigated further. With regard for avoidance, the Scheme is CNP infrastructure, for which the government has concluded an urgent need for development to come forward as soon as possible (Paragraph 3.3.83 of NPS EN-1). **ES Chapter 3: Order limits and Context [APP/6.1]** confirms that the Order limits have been selected and designed to avoid designated areas. The Order Limits is not covered by any statutory ecological designations, nor is it an ancient woodland. None of the land within the Order limits is covered by any statutory landscape designations, i.e. National Parks or National Landscapes.
Secretary of State decision making - Impacts – Glint and Glare	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).	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).	As set out in **ES Appendix 2.1: EIA Scoping Opinion Request [APP/6.4]** and agreed by PINS in **ES Appendix 2.2: Scoping Opinion Response [APP/6.4]**), an individual Glint and Glare chapter is not required in the ES. **ES Chapter 16: Other Environmental Matters [APP/6.2]** assess glint and glare effects in respect of those matters that are scoped in. The locations of relevant receptors are shown within the supporting **ES Appendix 16.2: Solar Photovoltaic Glint and Glare Study [APP/6.4].** **ES Chapter 16: Other Environmental Matters [APP/6.2]** concludes that, with embedded mitigation measures in place, there is no potential for significant glint and glare effects as a result of the Scheme's construction, operational and decommissioning phases. Embedded mitigation measures have been included in the **ES Appendix 16.2: Solar Photovoltaic Glint and Glare Study [APP/6.4]**. Advanced planting and hedgerow enhancement will be undertaken during winter 2025 and are to be completed during winter 2026 along the eastern boundary of the Site, as outlined in **Appendix 3: Advanced Planting Plan** of the **oLEMP [APP/7.11].**
	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.	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.	As set out in **ES Chapter 16: Other Environmental Matters [APP/6.2],** glint and glare effects in respect of those matters that are scoped in include, but are not limited to: • RAF Marham and Great Friars Thornes Farm Airfield; and • East Winch Airfield and Great Massingham Airfield (aviation infrastructure outside of the 5km and 10km Study Areas). Prior to the implementation of any mitigation, the Scheme has the potential to affect glint and glare during the construction, operational and/or decommissioning phases by PV panels reflecting sunlight, causing glint and glare towards Air Traffic Control (ATC) towers and aircraft on approach to nearby airfields, potentially disrupting visibility for ATC personnel and pilots, posing safety risks. Solar reflections with 'potential for temporary after-image' are predicted to be geometrically possible towards the ATC Tower at RAF Marham for the Fixed South Facing PV Array

			configuration; however, consideration of Zones of Theoretical Visibility (ZTV) modelling indicates that views of the site are unlikely to be possible in practice. Consultation with the Ministry of Defence is ongoing to confirm whether views of the site are possible from the ATC tower, to understand their position towards the development and whether this level of glare may be considered operationally accommodatable. No significant impacts are predicted on aviation activity at both East Winch Airfield and Great Massingham Airfield.
Secretary of State decision making - Impacts – Cultural Heritage	2.10.160 Solar farms are generally consented on the basis that they will be time-limited in operation. The Secretary of State should therefore consider the length of time for which consent is sought when considering the impacts of any indirect effect on the historic environment, such as effects on the setting of designated heritage assets.	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.	Decommissioning is expected to take between 12 and 24 months, and for the purposes of the assessment, is expected to occur after the 60-year design life of the Scheme in 2093. A requirement to decommission the Scheme is secured via a requirement in the **draft DCO [APP/3.1]**. The assessment within **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** has been carried out for the 60-year design life of the Scheme.
Secretary of State decision making - Impacts – Construction including traffic and transport noise and vibration	2.10.161 Once solar farms are in operation, traffic movements to and from the site are generally very light, in some instances as little as a few visits each month by a light commercial vehicle or car. Should there be a need to replace machine components, this may generate heavier commercial vehicle movements, but these are likely to be infrequent.	2.10.153 Once solar farms are in operation, traffic movements to and from the site are generally very light, in some instances as little as a few visits each month by a light commercial vehicle or car. Should there be a need to replace machine components, this may generate heavier commercial vehicle movements, but these are likely to be infrequent.	The **oOTMP [APP/7.9]** states that during the operation of the Scheme, the use of smaller vehicles such as cars, 4x4 type vehicles, or light vans will occur, but the number of daily trips will be small. Additional staff will be in attendance when required for maintenance and cleaning activities. The **oOTMP [APP/7.9]** continues to state that larger HGVs and AIL are not anticipated for general maintenance. The low level of traffic generated during the operational phase of the Scheme is such that this matter has been scoped out of the assessment within **ES Chapter 9: Transport and Access [APP/6.2].**
	2.10.162 The Secretary of State is unlikely to give any more than limited weight to traffic and transport noise and vibration impacts from the operational phase of a project.	2.10.154 The Secretary of State is unlikely to give any more than limited weight to traffic and transport noise and vibration impacts from the operational phase of a project.	

Table 3 NPS EN-5 – Table of Compliance

Policy	Policy Text	Draft Policy Text	Assessment
Part 1.1 Background	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.	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.	The Scheme would make a significant contribution to the achievement of both the national renewable energy targets and to the UK's contribution to global efforts to reduce the effects of climate change. The **Statement of Need [APP/5.4]** explains that the meaningful and timely contributions offered by the Scheme to UK decarbonisation and security of supply, while helping lower bills for consumers throughout its operational life, will be critical on the path to net zero beyond delivery of the government's 'Clean Power by 2030' mission. Without the Scheme, a significant and vital opportunity to develop a large-scale low carbon generation scheme would have been passed over, increasing materially the risk that future Carbon Budgets and the net zero 2050 target will not be achieved
	1.1.5 As identified in EN-1, government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. This includes: for electricity grid infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as substations. This is not limited to those associated specifically with a particular generation technology, as all new grid projects will contribute towards greater efficiency in constructing, operating and connecting low carbon infrastructure to the National Electricity Transmission System. These are viewed by the government as being CNP infrastructure and should be progressed as quickly as possible.	1.1.6 As identified in EN-1, government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. This includes: for electricity grid infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as substations. This is not limited to those associated specifically with a particular generation technology, as all new grid projects will contribute towards greater efficiency in constructing, operating and connecting low carbon infrastructure to the National Electricity Transmission System. These are viewed by the government as being CNP infrastructure and should be progressed as quickly as possible.	The Scheme is low carbon solar PV generation infrastructure and is CNP. Substantial weight should be afforded to the Scheme in the decision-making process due to its need being established as a CNP. The associated infrastructure associated with the Scheme is also considered CNP infrastructure under this policy, which includes substations incorporated into the Scheme. The **Statement of Need [APP/5.4]** explains that the Scheme will be a substantial infrastructure asset, which, if consented, will deliver over 50 MW of secure, low-carbon electricity, which will help the UK achieve its Sixth Carbon Budget commitments and stay on track to achieve net zero by 2050.
Part 2.2 Factors influencing site selection and design	2.2.1 The Secretary of State should bear in mind that the initiating and terminating points – or development zone – of new electricity networks infrastructure is not substantially within the control of the applicant.	2.2.1 The Secretary of State should bear in mind that the initiating and terminating points – or development zone – of new electricity networks infrastructure is not substantially within the control of the applicant.	**ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** describes the consideration of reasonable alternatives carried out by the Applicant in relation to the Site for the Scheme, layouts and choice of technology. It is supported by Appendix 1: Site Evaluation Report to this Planning Statement, which provides an appraisal of alternative sites and demonstrates consideration of relevant policy and its applicability to the site evaluation process undertaken by the Applicant**. Appendix 1: Site Evaluation Report** to the **Planning Statement [APP/5.5]** presents the reasoning for why the Scheme and Order limits are located in the Site's particular location. The Applicant engaged with NGET to discuss potential opportunities for a connection offer within the Norfolk area. Subsequently, a grid connection offer was made for a 500MW capacity in Swaffham, as outlined in the **Grid Connection Statement [APP/7.1].** The **Works Plan [APP/2.3]** accurately reflects this recent engagement, whilst the illustrative material submitted together with this DCO Application (for example, **ES Figure 5.1: Concept Masterplan [APP/6.3]** and **ES Appendix 5.1: Illustrative Technical Information [APP/6.4]** will be revised as the micro-siting and orientation of the new National Grid Substation within Work No. 4A continues to be discussed.
	2.2.2 Siting is determined by: • the location of new generating stations or other infrastructure requiring connection to the network, and/or • system capacity and resilience requirements determined by the Electricity System Operator.	2.2.2 Siting is determined by: • the location of new generating stations or other infrastructure requiring connection to the network, and/or • system capacity and resilience requirements determined by the National Energy System Operator (NESO).	

	2.2.8 There will usually be a degree of flexibility in the location of the development's associated substations, and applicants should consider carefully their location, as well as their design.	2.2.8 There will usually be a degree of flexibility in the location of the development's associated substations, and applicants should consider carefully their location, as well as their design.	Due to the grid connection offer, a 500MW connection into the existing overhead line between Walpole and Necton has been offered, as set out in the **Grid Connection Statement [APP/7.1]**. The offer outlines the need for the Applicant to source land suitable for a new National Grid Substation. The Applicant has undertaken a desktop assessment to identify potential siting zones for a new National Grid Substation along an approximately 45km stretch of the existing 400kV Transmission Line between Necton and Walpole, as stated within the **Grid Connection Statement [APP/7.1].** Section 4.2 of the **Site Evaluation Report (Appendix 1 to the Planning Statement [APP/5.5])** sets out the Applicant's National Grid Substation site assessment. As set out in **ES Chapter 4: Alternative and Design Evolution [APP/6.2],** Norfolk represents a good location within the UK to construct a solar farm as the area benefits from higher levels of photovoltaic power and irradiance compared to other parts of the UK. Flat or gently south-facing slopes are most suitable and beneficial for solar. Topography, which is generally flat or gently undulating, is most suitable for solar energy from both a constructability and operational perspective, ensuring that the Site can produce a large amount of electricity. This factor has influenced the focus on the Norfolk area as the preferred location of the Scheme. The general topography surrounding the Site is flat or has limited gradients, making it particularly suitable for solar energy. In addition, Norfolk benefits from large areas of land characterised by a generally sparse settlement pattern. Such characteristics provide the opportunity for utility-scale solar development, which can contribute to delivering net zero.
	2.2.9 In particular, the applicant should consider such characteristics as the local topography, the possibilities for screening of the infrastructure and/or other options to mitigate any impacts. (See Section 2.10 below and Section 5.10 in EN-1.)	2.2.9 In particular, the applicant should consider such characteristics as the local topography, the possibilities for screening of the infrastructure and/or other options to mitigate any impacts. (See Section 2.10 below and Section 5.10 in EN-1.)	
Part 2.3 Climate change adaptation and resilience	2.3.2 As climate change is likely to increase risks to the resilience of some of this infrastructure, from flooding for example, or in situations where it is located near the coast or an estuary or is underground, applicants should in particular set out to what extent the proposed development is expected to be vulnerable, and, as appropriate, how it has been designed to be resilient to: • flooding, particularly for substations that are vital to the network; and especially in light of changes to groundwater levels resulting from climate change; • the effects of wind and storms on overhead lines; • higher average temperatures leading to increased transmission losses; • earth movement or subsidence caused by flooding or drought (for underground cables); and • coastal erosion – for the landfall of offshore transmission cables and their associated substations in the inshore and coastal locations respectively.	2.3.2 As climate change is likely to increase risks to the resilience of some of this infrastructure, from flooding for example, or in situations where it is located near the coast or an estuary or is underground, applicants should in particular set out to what extent the proposed development is expected to be vulnerable, and, as appropriate, how it has been designed to be resilient to: • flooding, particularly for substations that are vital to the network; and especially in light of changes to groundwater levels resulting from climate change; • the effects of wind and storms on overhead lines; • higher average temperatures leading to increased transmission losses; • earth movement or subsidence caused by flooding or drought (for underground cables); and • coastal erosion – for the landfall of offshore transmission cables and their associated substations in the inshore and coastal locations respectively.	**ES Chapter 13: Climate Change [APP/6.2]** assess the impacts of the Scheme on climate as a result of a number of impacts, including, but not limited to stronger winds, heatwaves, heavy precipitation and increased risk of fires/wildfires. Due to the nature of the Scheme, coastal erosion has not been assessed. • Section 13.9 of **ES Chapter 13: Climate Change [APP/6.2]** sets out the following embedded mitigation measures to ensure the Scheme is resilient to the increased risks associated with climate change: • To mitigate against flood risk, the Contractors will monitor weather forecasts and receive EA flood alerts and plan work accordingly as set out in the **oCEMP [APP/7.6]** and **oDS [APP/7.10]**. The **oOEMP [APP/7.8]** sets out that water management will be employed to control surface water run-off and drain hardstanding and other structures. Likewise, all sensitive and electrical equipment on the PV panel will be elevated by legs or mounted on raised frames. • The **oCEMP [APP/7.6]**, the **oOEMP [APP/7.8]**, and the **oDS [APP/7.10]** all set out that the Contractor will monitor weather forecasts for any high winds to ensure the safety of staff and infrastructure where increased dust or debris could impact on works or operations. • Higher temperatures will also require contractor monitoring of weather forecasts to ensure works are planned accordingly. BESS equipment will also utilise HVAC cooling systems to prevent overheating in warmer weather, as outlined in the **oCEMP [APP/7.6]** and **oOEMP [APP/7.8]**. • Low precipitation and the increased risk of fire will be mitigated by the storage of water on site and a fire suppression system as set out in the **oCEMP [APP/7.6]** and the **oOEMP [APP/7.8]**.

	2.3.3 Section 4.10 of EN-1 advises that the resilience of the project to the effects of climate change must be assessed in the Environmental Statement (ES) accompanying an application. For example, future increased risk of flooding would be covered in any flood risk assessment (see Sections 5.8 in EN-1). Consideration should also be given to coastal change (see sections 5.6 in EN1).	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 Section 5.6 in EN-1).	• As the development is approximately 25km from the coast, the Inspectorate agrees that significant effects from sea level rise are unlikely to occur**.** **ES Chapter 12: Water Resources [APP/6.2]** confirms that the entirety of the built aspects of the Scheme (Works No. 1-10) is situated in Flood Zone 1; only a small area of the Skylark Mitigation Works No. 11 (approximately 1.1 ha) is within the Flood Zone 2 and 3, which will continue to be used for agricultural activities; therefore, the Sequential Test is not triggered. **ES Chapter 12: Water Resources [APP/6.2]** assess the impacts of the Scheme on water quality, water bodies or protected areas, and concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse water effects expected across the Scheme's construction, operational and decommissioning phases on water quality, water bodies or protected areas. The residual effects outlined in the assessment rely on controls established within the **oCEMP [APP/7.6], oOEMP [APP/7.8],** the **FRA [APP/6.4]** and the **oDS [APP/7.10].** These outline management plans and the Surface Water Drainage Strategy, which is embedded in the **FRA [APP/6.4]**, set out the water-related measures to manage any potential water effects that may arise from the Scheme's construction, operational and decommissioning phases. As outlined in the **FRA [APP/6.4]**, surface water runoff from the Solar PV will be managed through Rural SuDS and Natural Flood Management techniques, such as grassland/wildflower areas, which will act to bind soils, slow surface water, and improve water quality compared to the baseline scenario. The **FRA [APP/6.4]** includes a Surface Water Drainage Strategy, which outlines how surface water runoff from the Site will be managed in accordance with national, regional, and local requirements regarding flood risk and drainage. As the Scheme does not have a detailed layout, a detailed drainage strategy cannot be provided at this stage, with the principles and design criteria presented in this document. These criteria will be applied at the detailed design phase and the detailed SuDS is secured in the DCO through a requirement of the **draft DCO [APP/3.1].** **The Design Approach Document [APP/5.7]** includes the adoption of project level design principles (Project Principles) to guide decision making and embed good design outcomes to the Scheme. Principles 4.3 ensures the Scheme is resilient to flooding and does not increase flooding elsewhere. **The Design Principles, Parameters and Commitments [APP/5.8]** require the Applicant at the detailed design stage to further consider water runoff with respect to: • the final location of the BESS Compound and layout of the BESS Containers • the final location of the Customer Substation Compound and layout; and • the final location of the National Grid Substation Compound and layout.
Part 2.4 – Consideration of good design for energy infrastructure	2.4.1 The Planning Act 2008 requires the Secretary of State to have regard, in designating an NPS, and in determining applications for development consent to the desirability of good design.	2.4.1 The 2008 Act 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.	As detailed in Section 2 of the **Planning Statement [APP/5.5]**, good design has been a fundamental consideration from the outset of the Scheme. The **Design Approach Document [APP/5.7]** illustrates how the design of the Scheme has been developed in accordance with a clear design framework, based on the criteria for good design outlined in NPS EN-1. This has included the adoption of project level design principles

	2.4.2 Applicants should consider the criteria for good design set out in EN1 Section 4.7 at an early stage when developing projects.	2.4.2 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.	(Project Principles) to guide decision making and embed good design outcomes to the Scheme. Throughout the design process, the Applicant maintained an interdisciplinary approach to design, considering both the opportunities and constraints of the Scheme. This included an analysis of the existing physical, environmental, social, and cultural context of the Site by a broad range of technical disciplines (including landscape and visual, noise, ecology, and heritage) as set out and assessed by **ES Topic Chapters [APP/6.2].** The Applicant has undertaken a desktop assessment to identify potential siting zones for a new National Grid Substation along an approximately 45km stretch of the existing 400kV Transmission Line between Necton and Walpole, as stated within the **Grid Connection Statement [APP/7.1].** Section 4.2 of the **Site Evaluation Report (Appendix 1 to the Planning Statement [APP/5.5])** sets out the Applicant's National Grid Substation site assessment.
	2.4.3 However, the Secretary of State should bear in mind that electricity networks infrastructure must in the first instance be safe and secure, and that the functional design constraints of safety and security may limit an applicant's ability to influence the aesthetic appearance of that infrastructure.	2.4.3 However, the Secretary of State should bear in mind that electricity networks infrastructure must in the first instance be safe and secure, and that the functional design constraints of safety and security may limit an applicant's ability to influence the aesthetic appearance of that infrastructure.	Security is an important consideration across the construction, operational (and maintenance) and decommissioning phases of the Scheme. Each area of the Site has been assessed against its function and requirements for security measures, with a focus on being safe and secure by design. This has led to the implementation of mitigation measures, including fencing, security gates, CCTV, and passive infrared lighting. **ES Chapter 5: The Scheme [APP/6.1]** sets out that during operation, a perimeter fence will enclose the operational area of the Scheme. A Deer fence will enclose the PV Arrays, whilst a Palisade fence will enclose the Conversion Units, 33kV Sub-distribution Switch Rooms, BESS, Customer Substation and National Grid Substation. The deer fence will be wooden or metal posts with a wire mesh up to 2.5m in height. Palisade fencing would be up to 3m in height, as secured through the **Design Principles, Parameters and Commitments [APP/5.8]**. **ES Chapter 5: The Scheme [APP/6.1]** sets out that pole mounted internal facing closed circuit television (CCTV) systems installed at a height of up to 3m will be deployed around the perimeter of the Site. The CCTV cameras would use night-vision technology, which would be monitored remotely and avoid the need for night-time lighting of the Solar PV Site, as secured through the **Design Principles, Parameters and Commitments [APP/5.8]**.
	2.4.4 While the above principles should govern the design of an electricity networks infrastructure application to the fullest possible extent – including in its avoidance and/or mitigation of potential adverse impacts (particularly those detailed in Sections 2.9 below) – the functional performance of the infrastructure in respect of security of supply and public and occupational safety must not thereby be threatened.	2.4.4 While the above principles should govern the design of an electricity networks infrastructure application to the fullest possible extent – including in its avoidance and/or mitigation of potential adverse impacts (particularly those detailed in Section 2.10 below) – the functional performance of the infrastructure in respect of security of supply and public and occupational safety must not thereby be threatened.	
Part 2.5 Environmental and Biodiversity Net Gain	2.5.1 When planning and evaluating the proposed development's contribution to environmental and biodiversity net gain, it will be important – for both the applicant and the Secretary of State – to supplement the generic guidance set out in EN-1 (Section 4.6) with recognition that the linear nature of electricity networks infrastructure can allow for excellent opportunities to: i. reconnect important habitats via green corridors, biodiversity stepping zones, and reestablishment of appropriate hedgerows; and/or ii. connect people to the environment, for instance via footpaths and	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 • connect people to the environment, for instance via footpaths and cycleways	**ES Chapter 7: Ecology and Biodiversity [APP/6.2]** describes the existing levels and assesses the anticipated ecology and biodiversity effects of the Scheme's construction, operational, and decommissioning. The chapter provides an assessment of the potential effects on internationally, nationally, and locally designated sites of ecological or geological importance, on protected species, and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats. **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse ecology and biodiversity related effects expected across the Scheme's construction, operational and decommissioning phases. As a result of embedded and additional mitigation and enhancement measures, there are four direct residual significant (in EIA terms) beneficial effects as a result of the Scheme, which are anticipated in relation to the following ecological features: hedgerows and lines of trees; breeding birds – other species; overwintering birds and amphibians – Great Crested Newt. The expected residual beneficial effects outlined in **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** rely on controls established in the **oCEMP [APP/7.6]**, **oOEMP**

	cycleways constructed in tandem with environmental enhancements.	constructed in tandem with environmental enhancements.	**[APP/7.8]**, **oDS [APP/7.10]** and the **oLEMP [APP/7.11]** and are secured via corresponding requirements of the **draft DCO [APP/3.1]**. Section 7.7 of **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** sets out the mitigation measures embedded relevant to biodiversity into the Scheme, including but not limited to measures to prevent accidental killing and injury of mammals, including hedgehogs, will be implemented during the construction and decommissioning phases. The Scheme includes measures to ensure that potential effects on light-sensitive species such as bats are fully mitigated. These measures are referred to within the **oCEMP [APP/7.6], oOEMP [APP/7.8]** and the **oDS [APP/7.10]**, and secured via the **draft DCO [APP/3.1].** Landscape and ecological enhancements and mitigation measures for the Scheme are shown on **Appendix 1: Green Infrastructure Strategy Plans** to the **oLEMP [APP/7.11]**. As presented in the **Biodiversity Net Gain Assessment Report [APP/7.4],** the ecological mitigation and enhancement areas will deliver a net gain of 23.46% for onsite habitats, and a net gain of 58.78% for onsite hedgerow and tree lines while a requirement of the **draft DCO [APP/3.1]** commits to delivering a minimum net gain of 10% for onsite habitats, and a net gain of 10% for onsite hedgerow and tree lines. Section 7.11 of **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** outlines the summary of biodiversity inter-project cumulative effects, including residual significant effects, in EIA terms. The section concludes that there is no potential for significant cumulative adverse effects to occur in combination with any of the identified cumulative schemes. The **oPRoWPPMP [APP/7.12]** outlines the measures to limit disruption and ensure that the PRoW network can continue to be used throughout the construction, operational, and decommissioning phases of the Scheme, while minimising the impact on PRoW users. The Scheme includes opportunities for advancement, including the proposed approximately 3785 linear metres of permissive paths within the Order limits and approximately 1203 linear metres of permissive paths outside the Order limits.
Part 2.7 Holistic planning	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.	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.	As set out in **ES Chapter 2: EIA Process and Methodology [APP/6.1]**, a Cumulative Effects Assessment (CEA) has been undertaken as part of the EIA in accordance with PINS Advice on Cumulative Effects Assessment (September 2024) and has considered two types of cumulative effects. • In combination effects: the combined effect generated by individual effects on a particular receptor (presented within **ES Chapter 17: In-Combination Effects [APP/6.2]**); and • Cumulative effects: effects generated by the Scheme and other planned or approved developments on the same receptor (presented in **ES Chapters 6 to 16 [APP/6.2]**). **ES Chapter 5: The Scheme [APP/6.1]** sets out that the Scheme comprises the construction, operation, maintenance, and decommissioning of a solar photovoltaic (PV) electricity generating station and associated development comprising Battery Energy Storage System (BESS), a Customer Substation, and Grid Connection Infrastructure, including a new National Grid Substation. The Scheme would allow for the generation and export of over 50MW Alternating Current (AC) of renewable energy, connecting into the National Electricity Transmission System (NETS) overhead line that passes through the Site.
	2.7.2 Accordingly, the government envisages that, wherever reasonably possible, applications for new generating stations and their related infrastructure should be contained in a single application to the Secretary of State. However, a consolidated approach of this kind may not always be possible, nor represent the most efficient strategy for delivery of new infrastructure.	2.7.2 Accordingly, the government envisages that, wherever reasonably possible, applications for new generating stations and their related infrastructure should be contained in a single application to the Secretary of State. However, a consolidated approach of this kind may not always be possible, nor represent the most efficient strategy for delivery of new infrastructure.	
	2.7.4 It may also be the case that the networks infrastructure application and the application for a related generating station	2.7.4 It may also be the case that the networks infrastructure application and the application for a related generating station	

	will of necessity come from different legal entities, or from entities subject to different commercial and regulatory frameworks.	will of necessity come from different legal entities, or from entities subject to different commercial and regulatory frameworks.	
Part 2.8 Strategic Network Planning	2.8.4 The Secretary of State should also take into account that Transmission Owners (TOs) and Distribution Network Operators (DNOs) are required under Section 9 of the Electricity Act 1989 to bring forward efficient and economical proposals in terms of network design.	2.8.7 The Secretary of State should also take into account that Transmission Owners (TOs) and Distribution Network Operators (DNOs) are required under Section 9 of the Electricity Act 1989 to bring forward efficient and economical proposals in terms of network design.	The Applicant engaged with NGET to discuss potential opportunities for a connection offer within the Norfolk area. Subsequently, a grid connection offer was made for a 500MW capacity in Swaffham, as outlined in the **Grid Connection Statement [APP/7.1]**. The **Works Plan [APP/2.3]** accurately reflects this recent engagement, whilst the illustrative material submitted together with this DCO Application (for example, **ES Figure 5.1: Concept Masterplan [APP/6.3]** and **ES Appendix 5.1: Illustrative Technical Information [APP/6.4]** will be revised as the micro-siting and orientation of the new National Grid Substation within Work No. 4A continues to be discussed. Due to the grid connection offer, a 500MW connection into the existing overhead line between Walpole and Necton has been offered, as set out in the **Grid Connection Statement [APP/7.1]**. The offer outlines the need for the Applicant to source land suitable for a new National Grid Substation as detailed in Section 4.2 of Appendix 1: Site Evaluation Report to this Planning Statement. In accordance with Paragraph 4.11.5 of NPS EN-1, the Applicant engaged with NGET to discuss potential opportunities for a connection offer within the Norfolk area. During this ongoing engagement, the Applicant and National Grid reached an agreement on a connection offer of 500MW into the existing overhead line between Walpole and Necton. At the same time as National Grid's offer for a 500MW connection, a land agent indicated to the Applicant that the landowner was willing to put forward the proposed Site for a solar farm development. This single proposed Site would provide sufficient land to site the Scheme in its entirety.
	2.8.5 TOs and DNOs are also required to facilitate competition in the generation and supply of electricity, and electricity distributors have a statutory duty to provide a connection where requested.	2.8.8 TOs and DNOs are also required to facilitate competition in the generation and supply of electricity, and have to provide a connection when requested.	
Part 2.9 Applicant Assessment - *Biodiversity and Geological Conservation*	2.9.3 Electricity networks infrastructure pose a particular potential risk to birdlife including large birds, such as swans and geese, and perching birds. These may collide with overhead lines and risk being electrocuted. Large birds may also be electrocuted when landing or taking off by completing an electric circuit between live and ground wires. Even perching birds can be killed as soon as their wings touch energised parts of the infrastructure.	2.9.3 Electricity networks infrastructure pose a particular potential risk to birdlife including large birds, such as swans and geese, and perching birds. These may collide with overhead lines and risk being electrocuted. Large birds may also be electrocuted when landing or taking off by completing an electric circuit between live and ground wires. Even perching birds can be killed as soon as their wings touch energised parts of the infrastructure.	Consideration regarding overhead power lines is outlined in **ES Chapter 7: Ecology and Biodiversity [APP/6.2].** **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** describes the existing levels and assesses the anticipated ecology and biodiversity effects of the Scheme's construction, operational, and decommissioning. The chapter provides an assessment of the potential effects on internationally, nationally, and locally designated sites of ecological or geological importance, on protected species, and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats. **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse ecology and biodiversity related effects expected across the Scheme's construction, operational and decommissioning phases. As a result of embedded and additional mitigation and enhancement measures, there are four direct residual significant (in EIA terms) beneficial effects as a result of the Scheme, which are anticipated in relation to the following ecological features: hedgerows and lines of trees; breeding birds – other species; overwintering birds and amphibians – Great Crested Newt. The expected residual beneficial effects outlined in **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** rely on controls established in the **oCEMP [APP/7.6]**, **oOEMP [APP/7.8]**, **oDS [APP/7.10]** and the **oLEMP [APP/7.11]** and are secured via corresponding requirements of the **draft DCO [APP/3.1]**.
	2.9.4 Applicants should consider measures to make lines more visible such as bird flappers and diverters which are covered in more detail in paragraphs 2.10.3 and 2.10.4.	2.9.4 Applicants should consider measures to make lines more visible such as bird flappers and diverters which are covered in more detail in Sections 2.10.2 - 2.10.4.	
	2.9.5 The applicant will need to consider whether the proposed line will cause such problems at any point along its length and take this into consideration in the preparation of the ES (see Section 4.3 of EN-1).	2.9.5 The applicant will need to consider whether the proposed line will cause such problems at any point along its length and take this into consideration in the preparation of the ES (see Section 4.3 of EN-1).	

	2.9.6 Particular consideration should be given to feeding and hunting grounds, migration corridors and breeding grounds, where they are functionally linked to sites designated or allocated under the 'national site network' provisions of the Conservation of Habitats and Species Regulations.	2.9.6 Particular consideration should be given to feeding and hunting grounds, migration corridors and breeding grounds, where they are functionally linked to sites designated or allocated under the 'national site network' provisions of the Conservation of Habitats and Species Regulations and Conservation of Offshore Marine Habitats and Species Regulations.	
Part 2.9 Applicant Assessment - *Landscape and Visual Impact*	2.9.7 While the government does not believe that the development of overhead lines is incompatible in principle with applicants' statutory duty under Schedule 9 to the Electricity Act 1989, to have regard to visual and landscape amenity and to reasonably mitigate possible impacts thereon, in practice new overhead lines can give rise to adverse landscape and visual impacts.	2.9.7 While the government does not believe that the development of overhead lines is incompatible in principle with applicants' statutory duty under Schedule 9 to the Electricity Act 1989, to have regard to visual and landscape amenity and to reasonably mitigate possible impacts thereon, in practice new overhead lines can give rise to adverse landscape and visual impacts.	The location of the National Grid Substation and Customer Substation are sited within Field 27 as illustrated in **ES Figure 5.1: Concept Masterplan [APP/6.3].** The exact location would be confirmed post consent to allow for flexibility in design. As described in **ES Chapter 5: The Scheme [APP/6.1]**, the Scheme proposes diverting the existing dual circuit 400kV overhead line (OHL) into a newly constructed double busbar substation (the National Grid Substation). The Applicant however wishes to retain an element of optionality in keeping the existing line of pylons and the new diversion as presented in **ES Figure 5.1: Concept Masterplan [APP/6.3]** so that the detailed design of the Scheme can be informed by technical considerations, post-consent work, and take advantage of innovations in technology. **ES Chapter 6: Landscape and Visual [APP/6.2]** provides an assessment of the Scheme's impact on landscape and visual receptors, identifying construction, operational phases (short, medium, and long term), and decommissioning as the phases for assessment across the Scheme. During the operational phase, the Scheme will generally remain unlit with the exception of the Customer Substation and National Grid Substation which have manually operated or motion-detection lighting utilised for operational and security purposes. The lighting design will seek to limit any impacts on sensitive receptors through directional cowls, as secured through the **oOEMP [APP/7.8]**. Significant landscape and visual impacts as a result of lighting would be unlikely given that the Scheme would be largely unlit, with the exception of the Customer Substation and National Grid Substation, which would only include motion sensing lighting, and used only for security and maintenance purposes. **ES Chapter 6: Landscape and Visual [APP/6.2]** concludes the following significant residual adverse impacts: • D1: Swaffham Heath LCA: there are moderate adverse effects across all phases of the Scheme. • E6: North Pickenham Plateau LCA: there are moderate adverse effects across all phases of the Scheme. • VRG1: Central Site Area: there are major-moderate adverse effects across construction, decommissioning, and operational (short and medium term) phases of the Scheme. • VRG2: North-Eastern Site Area: there are major-moderate adverse effects across construction, decommissioning, and operational (short and medium term) phases of the Scheme.
	2.9.8 These impacts depend on the type (for example, whether lines are supported by towers or monopole structures), scale, siting, and degree of screening of the lines, as well as the characteristics of the landscape and local environment through which they are routed.	2.9.8 These impacts depend on the type (for example, whether lines are supported by towers or monopole structures), scale, siting, and degree of screening of the lines, as well as the characteristics of the landscape and local environment through which they are routed.	
	2.9.9 New substations, sealing end compounds (including terminal towers), and other above-ground installations that serve as connection, switching, and voltage transformation points on the electricity network may also give rise to adverse landscape and visual impacts.	2.9.9 New substations, sealing end compounds (including terminal towers), and other above-ground installations that serve as connection, switching, and voltage transformation points on the electricity network may also give rise to adverse landscape and visual impacts.	
	2.9.10 Cumulative adverse landscape, seascape and visual impacts may arise where new overhead lines are required along with other related developments such as substations, wind farms, and/or other new sources of generation.	2.9.10 Cumulative adverse landscape, seascape and visual impacts may arise where new overhead lines are required along with other related developments such as substations, wind farms, and/or other new sources of generation.	
	2.9.11 Landscape and visual benefits may arise through the reconfiguration, rationalisation, or undergrounding of existing electricity network infrastructure. Though mitigation of the landscape and visual impacts arising from overhead lines and their associated infrastructure is usually possible, it may not always be so, and the impossibility	2.9.11 Landscape and visual benefits may arise through the reconfiguration, rationalisation, or undergrounding of existing electricity network infrastructure. Though mitigation of the landscape and visual impacts arising from overhead lines and their associated infrastructure is usually possible, it may not always be so, and the impossibility	

	of full mitigation in these cases does not countermand the need for overhead lines.	of full mitigation in these cases does not countermand the need for overhead lines.	• VRG3: Nar Valley Southern Slope and Settlement Edge of South Acre: there are moderate adverse effects across construction, decommissioning, and operational (short term) phases of the Scheme. • The Peddars Way and Norfolk Coastal Path: there are moderate adverse effects across construction, decommissioning phases of the Scheme. • The Peddars Way and Norfolk Coastal Path, Over a limited extent only. Within and up to 300m from the Site: there are moderate adverse effects across the operational (short and medium term) phase of the Scheme. • Rebellion Way Cycle Route: there are moderate adverse effects across construction, decommissioning phases of the Scheme. • Rebellion Way Cycle Route, Over a limited extent only. Within the Site: there are moderate adverse effects across the operational (short and medium term) phase of the Scheme. The mitigation hierarchy has been applied throughout the design and development of the Scheme landscape and visual impacts have been minimised as far as practicable. The residual effects above cannot be mitigated further. Through the application of good design principles including the application of the mitigation hierarchy, a robust approach to secure good design would be achieved. Despite this approach, some significant residual visual effects would remain to two landscape receptors as summarised above. Paragraph 5.10.35 of NPS EN-1 confirms that "*The scale of energy projects means that they will often be visible across a very wide area. The Secretary of State should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project*." Section 6.11 of **ES Chapter 6: Landscape and Visual [APP/6.2]** describes the existing levels and assesses the anticipated cumulative landscape and visual effects of the Scheme's construction, operational (short, medium and long term), and decommissioning, in accordance with this policy. **ES Chapter 6: Landscape and Visual [APP/6.2]** concludes the following significant residual adverse cumulative impacts, cumulatively with High Grove Solar: • E6: North Pickenham Plateau LCA: there are significant adverse effects across all phases of the two developments. • VRG4: Great Palgrave and Little Palgrave: there are significant adverse effect for users of PRoW Sporle with Palgrave BR5 across the construction and decommissioning phases of the two developments. With the critical and urgent need for the Scheme enshrined in national and local policy, it is considered that the identified residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case in accordance with Paragraphs 5.10.12, 5.10.14 and 5.10.35 of NPS EN-1. **ES Chapter 3: Order limits and Context [APP/6.1]** confirms that the Order limits have been selected and designed to avoid designated areas. The Order limits is not covered by any statutory ecological designations, nor is it an ancient woodland. None of the land within the Order limits is covered by any statutory landscape designations, i.e. National Parks or National Landscapes.
	2.9.12 However, in nationally designated landscapes (for instance, National Parks, The Broads and Areas of Outstanding Natural Beauty) even residual impacts may well make an overhead line proposal unacceptable in planning terms. (See Section 2.9.20 below for guidance on this case.)	2.9.12 However, in nationally designated landscapes (National Parks, The Broads and National Landscapes) even residual impacts may make an overhead line proposal unacceptable in planning terms (See Section 2.9.21 below for guidance on this case).	
	2.9.13 Where possible, applicants should ensure that the principles detailed in Sections 2.11.16-2.11.19 below are embodied in the design of their proposed overhead line route and its associated infrastructure. Applicants should also offer proposals (for instance those detailed in Section 2.10 below) for additional mitigation.	2.9.13 Where possible, applicants should ensure that the principles detailed in Sections 2.9.16-2.9.19 below are embodied in the design of their proposed overhead line route and its associated infrastructure.	
	2.9.14 Where the nature or proposed route of an overhead line will likely result in particularly significant landscape and visual impacts, as would be assessed through landscape, seascape and visual impact assessment, the applicant should demonstrate that they have given due consideration to the costs and benefits of feasible alternatives to the overhead line. This could include – where appropriate – rerouting, underground or subsea cables and the feasibility e.g. in cost, engineering or environmental terms of these. Applicants should note the position on nationally designated landscapes at section 2.9.20 below.	2.9.14 Where the nature or proposed route of an overhead line will likely result in particularly significant landscape and visual impacts, as would be assessed through landscape, seascape and visual impact assessment (LSVIA), the applicant should demonstrate that they have given due consideration to the costs and benefits of feasible alternatives to the overhead line. This could include, where appropriate re-routing, underground or subsea cables and the feasibility e.g. in cost, engineering or environmental terms of these. Applicants should note the policy position for nationally designated landscapes at Section 2.9.21 below.	
	2.9.32 Surface grease on conductors can also give rise to audible noise effects as grease is able to move slowly under the	2.9.33 Surface grease on conductors can also give rise to audible noise effects as grease is able to move slowly under the	

Part 2.9 Applicant Assessment - *Noise and Vibration*	influence of an electric field, tending to form points which then initiate discharge activity. Surface grease is likely to occur along the entire length of a conductor. Hence there may be many potential discharge sources and, consequently, a higher noise level.	influence of an electric field, tending to form points which then initiate discharge activity. Surface grease is likely to occur along the entire length of a conductor. Hence there may be many potential discharge sources and, consequently, a higher noise level.	**ES Chapter 10: Noise and Vibration [APP/6.2]** presents a noise assessment in accordance with the requirements of this policy, including a description of the noise generating aspects of the development. The noise assessment is proportionate to the likely noise impact. **ES Chapter 10: Noise and Vibration [APP/6.2]** consists of, but is not limited to an assessment of potential effects upon NSRs during the operational phase of the Scheme, from the operation of the National Grid Substation, Customer Substation, Battery Energy Storage System (BESS) and Conversion Units It concludes that with the implementation of mitigation measures, significant adverse noise and vibration effects during the construction, operation and decommissioning of the Scheme will be avoided at sensitive receptors. The embedded and additional mitigation measures are documented within the: **oCEMP [APP/7.6], oCTMP [APP/7.7], oOEMP [APP/7.8], oOTMP [APP/7.11]** and **oDS [APP/7.10]** and are secured via requirements of the **draft DCO [APP/3.1]**. **ES Chapter 10: Noise and Vibration [APP/6.2]** assesses operational noise at the identified sensitive noise receptors following BS 4142 guidance, BS 8233:2014 and World Health Organisation guidance. Construction and decommissioning noise and vibration impacts have been assessed in accordance with Annexe E of British Standard 5228-1.
	2.9.33 This will only occur if substandard grease has been used during manufacture or if the conductor has been overheated by carrying excessive electrical load. This can be mitigated through good design or by replacement.	2.9.34 This will only occur if substandard grease has been used during manufacture or if the conductor has been overheated by carrying excessive electrical load. This can be mitigated through good design or by replacement.	
	2.9.37 Audible noise effects can also arise from substation equipment such as transformers, quadrature boosters and mechanically switched capacitors.	2.9.38 Audible noise effects can also arise from substation equipment such as transformers, quadrature boosters and mechanically switched capacitors.	
	2.9.38 Transformers are installed at many substations, and generate low frequency hum. Whether the noise can be heard outside a substation depends on a number of factors, including transformer type and the level of noise attenuation present (either engineered intentionally or provided by other structures).	2.9.39 Transformers are installed at many substations, and generate low frequency hum. Whether the noise can be heard outside a substation depends on a number of factors, including transformer type and the level of noise attenuation present (either engineered intentionally or provided by other structures).	
	2.9.39 For the assessment of noise from substations, standard methods of assessment and interpretation using the principles of the relevant British Standards are satisfactory.	2.9.40 For the assessment of noise from substations, standard methods of assessment and interpretation using the principles of the relevant British Standards are satisfactory.	
	2.9.40 For the assessment of noise from overhead lines, the applicant must use an appropriate method to determine the sound level produced by the line in both dry and wet weather conditions, in addition to assessing the impact on noise-sensitive receptors.	2.9.41 For the assessment of noise from overhead lines, the applicant must use an appropriate method to determine the sound level produced by the line in both dry and wet weather conditions, in addition to assessing the impact on noise-sensitive receptors.	
	2.9.41 For instance, the applicant may use an appropriate noise modelling tool or tools for the prediction of overhead line noise and its propagation over distance, such as an ISO 9613-2 or Technical Report TR(T)94.	2.9.42 For instance, the applicant may use an appropriate noise modelling tool or tools for the prediction of overhead line noise and its propagation over distance, such as an ISO 9613-2 or Technical Report TR(T)94.	
	2.9.42 When assessing the impact of noise generated by overhead lines in wet weather relative to existing background sound levels, the applicant should consider the effect of	2.9.43 When assessing the impact of noise generated by overhead lines in wet weather relative to existing background sound levels, the applicant should consider the effect of	

	varying background sound levels due to rainfall.	varying background sound levels due to rainfall.	
Part 2.9 Applicant Assessment - *Electric and Magnetic Fields (EMFs)*	2.9.46 All overhead power lines produce EMFs. These tend to be highest directly under a line and decrease to the sides at increasing distance. Although putting cables underground eliminates the electric field, they still produce magnetic fields, which are highest directly above the cable. EMFs can have both direct and indirect effects on human health, aquatic and terrestrial organisms.	2.9.47 All overhead power lines produce EMFs. These tend to be highest directly under a line and decrease to the sides at increasing distance. Although putting cables underground eliminates the electric field, they still produce magnetic fields, which are highest directly above the cable. EMFs can have both direct and indirect effects on human health, aquatic and terrestrial organisms.	The Applicant does not anticipate any significant adverse EMF effects on any receptors. A high-level electromagnetic assessment has been conducted and is presented in Section 16.7 of ES Chapter 16: Other Environmental Matters [APP/6.2] and in **ES Appendix 16.3: High-Level Electromagnetic Field Assessment [APP/6.4]**. As concluded in the EMF Risk Assessment, there is no potential for significant effects as a result of the Scheme in respect of EMF, and there is no potential for significant cumulative effects in relation to EMF as a result of the Scheme and other identified developments within the Study Area.
	2.9.47 The direct effects occur in terms of impacts on the central nervous system resulting in its normal functioning being affected. Indirect effects occur through electric charges building up on the surface of the body producing a microshock on contact with a grounded object, or vice versa, which, depending on the field strength and other exposure factors, can range from barely perceptible to being an annoyance or even painful.	2.9.48 The direct effects occur in terms of impacts on the central nervous system resulting in its normal functioning being affected. Indirect effects occur through electric charges building up on the surface of the body producing a microshock on contact with a grounded object, or vice versa, which, depending on the field strength and other exposure factors, can range from barely perceptible to being an annoyance or even painful.	
Part 2.9 Applicant Assessment - *Sulphur Hexafluoride*	2.9.59 Sulphur Hexafluoride (SF6) is an insulating and arc-suppressant gas used in high-voltage switchgear for electricity networks.	2.9.60 Sulphur Hexafluoride (SF6) is an insulating and arc-suppressant gas used in high-voltage switchgear for electricity networks.	Sulphur Hexaflouride (SF6) is used in electrical equipment associated with the Scheme such as gas-insulated switchgear and transformers. The Greenhouse Gas (GHG) Assessment set out in **ES Chapter 13: Climate Change [APP/6.2]** includes an assessment of the GHG impact of the Scheme during construction, operation and maintenance, and decommissioning, and considers the potential for leakage of SF6 throughout the operation of the Scheme. **ES Chapter 13: Climate Change [APP/6.2]** sets out that the Scheme will adhere to good practice and guidance. In addition, gas-insulated switchgear equipment is now supplied to minimise leakages. Additionally, through regular checks of the equipment for gas leaks, it can be expected the leaks to be de minimis. **ES Chapter 13: Climate Change [APP/6.2]** also concludes that the Scheme's design and integrated mitigation measures effectively address climate change risks and that no significant climate change risks during the construction, operation and maintenance or decommissioning phase have been identified. The findings of the GHG assessment indicate that the Scheme will yield beneficial impacts and achieve a net reduction in GHG emissions, compared to a scenario without the Scheme.
	2.9.60 It is also an extraordinarily potent greenhouse gas, and fugitive emissions from electricity networks infrastructure are an object of increasing environmental concern, especially in light of the UK's commitment to net zero by 2050.	2.9.61 It is also an extraordinarily potent greenhouse gas, and fugitive emissions from electricity networks infrastructure are an object of increasing environmental concern, especially in light of the UK's commitment to net zero by 2050.	
	2.9.61 Applicants should at the design phase of the process consider carefully whether the proposed development could be reconceived to avoid the use of SF6-reliant assets.	2.9.62 Applicants should at the design phase of the process consider carefully whether the proposed development could be reconceived to avoid the use of SF6-reliant assets.	
	2.9.62 Where the development cannot be so conceived, the applicant must provide evidence of their reasoning on this point. Such evidence will include, for instance, an explanation of the alternatives considered, and a case why these alternatives are technically infeasible or require bespoke	2.9.63 Where the development cannot be so conceived, the applicant must provide evidence of their reasoning on this point. Such evidence will include, for instance, an explanation of the alternatives considered, and a case why these alternatives are technically infeasible or require bespoke	

	components that are grossly disproportionate in terms of cost.	components that are grossly disproportionate in terms of cost.	
	2.9.63 In particular, an accounting of the cost differential between the SF6- reliant asset and the appropriate SF6-free alternative should be provided.	2.9.64 In particular, an accounting of the cost differential between the SF6- reliant asset and the appropriate SF6-free alternative should be provided.	
	2.9.64 Where applicants, having followed the above procedure, do propose to put new SF6-reliant assets onto the electricity system, they should design a plan for the monitoring and control of fugitive SF6 emissions consistent with the Fluorinated gas (F-gas) Regulation and its successors.	2.9.65 Where applicants, having followed the above procedure, do propose to put new SF6-reliant assets onto the electricity system, they should design a plan for the monitoring and control of fugitive SF6 emissions consistent with the Fluorinated gas (F-gas) Regulation and its successors.	
2.10 Mitigation – *Landscape and Visual*	2.10.8 Furthermore, since long-term management of the selected mitigation schemes is essential to their mitigating function, a management plan, developed at least in outline at the conclusion of the examination, and which sets out proposals within a realistic timescale, should secure the integrity and benefit of these schemes. This should also uphold the landscape commitments made to achieve consent, alongside any pertinent commitments to environmental and biodiversity net gain.	2.10.8 Furthermore, since long-term management of the selected mitigation schemes is essential to their mitigating function, a management plan, developed at least in outline at the conclusion of the examination, and which sets out proposals within a realistic timescale, should secure the integrity and benefit of these schemes. This should also uphold the landscape commitments made to achieve consent, alongside any pertinent commitments to environmental and biodiversity net gain.	As presented in the **Biodiversity Net Gain Assessment Report [APP/7.4],** the ecological mitigation and enhancement areas will deliver a net gain of 23.46% for onsite habitats, and a net gain of 58.78% for onsite hedgerow and tree lines while a requirement of the **draft DCO [APP/3.1]** commits to delivering a minimum net gain of 10% for onsite habitats, and a net gain of 10% for onsite hedgerow and tree lines. Measures are secured in the **oLEMP [APP/7.11]**, which provides a framework for the planting, management and monitoring of landscaping and ecological mitigation and enhancement habitats for the Scheme during the construction and operational phases and secured through the requirement of the **draft DCO [APP/3.1].** Given that **ES Figure 5.1: Concept Masterplan [APP/6.3]** is illustrative and set within wider parameters, the exact siting of the larger infrastructure, such as the Customer Substation, National Grid Substation and Grid Connection Infrastructure, are yet to be defined. To fully consider the worst-case scenario, the parameter based photowire visualisations have been modelled to show the full extent of the indicative siting zones, despite the fact that, in reality, a much smaller area would only be required to accommodate the substations, given that the indicative size of the Customer Substation and National Grid Substation compounds are a maximum of 4 ha each, as detailed within **ES Chapter 5: The Scheme [APP/6.1]**.
2.10 Mitigation – *Electric and Magnetic Fields (EMFs)*	2.10.11 The applicant should consider the following factors: • height, position, insulation and protection (electrical or mechanical as appropriate) measures subject to ensuring compliance with the Electricity Safety, Quality and Continuity Regulations 2002; • that optimal phasing of high voltage overhead power lines is introduced wherever possible and practicable in accordance with the Code of Practice to minimise EMFs; and • any new advice emerging from the Department of Health and Social Care	2.10.11 The applicant should consider the following factors: • height, position, insulation and protection (electrical or mechanical as appropriate) measures subject to ensuring compliance with the Electricity Safety, Quality and Continuity Regulations 2002; • that optimal phasing of high voltage overhead power lines is introduced wherever possible and practicable in accordance with the Code of Practice to minimise EMFs; and • any new advice emerging from the Department of Health and Social Care	The Applicant does not anticipate any significant adverse EMF effects on any receptors. A high-level electromagnetic assessment has been conducted and is presented in Section 16.7 of **ES Chapter 16: Other Environmental Matters [APP/6.2]** and in **ES Appendix 16.3: High-Level Electromagnetic Field Assessment [APP/6.4]**. Design measures for the avoidance of significant effects have been built into the Scheme, and as concluded in the EMF Risk Assessment, there is no potential for significant effects as a result of the Scheme in respect of EMF. There is no potential for significant cumulative effects in relation to EMF as a result of the Scheme and other identified developments within the Study Area.

	relating to government policy for EMF exposure guidelines.	relating to government policy for EMF exposure guidelines.	

Table 4 National Planning Policy Framework – Table of Compliance

Policy	Policy Text	Assessment
Section 2: Achieving sustainable development. **Paragraph 8**	Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives): a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure; b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.	The **Planning Statement [APP/5.5]** outlines how the Scheme achieves the three objectives of sustainable development outlined in Paragraph 8 of the NPPF. The **Planning Statement [APP/5.5]** and the **Statement of Need [APP/5.4]** set out the critical need for large scale ground mounted solar deployment, as established under national planning policy, specifically NPS EN-1 and NPS EN-3. The Scheme would contribute substantially to the need for low carbon energy, in order for the government to meet its objectives and commitments. By generating low carbon energy at a low marginal cost, large-scale solar power reduced the energy generated by more expensive and more carbon intensive forms of generation. The Scheme will help to decarbonise the electricity system and lower the market price of electricity. **ES Chapter 14: Socio-Economics [APP/6.2]** describes the existing levels and assesses the anticipated economic and social effects of the Scheme's construction, operational, and decommissioning. **ES Chapter 14: Socio-Economics [APP/6.2]** concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse socio-economic related effects expected across the Scheme's construction, operational and decommissioning phases. There is a significant beneficial effect anticipated on the provision of education, skills, training and supply chain as a result of the Scheme's construction, operational and decommissioning phases. The residual effects outlined in the **ES Chapter 14: Socio-Economics [APP/6.2]** rely on controls established within the **oCEMP [APP/7.6], oESSCS [APP/7.15], oOEMP [APP/7.8]** and the **oDS [APP/7.10]** and are secured via corresponding requirements in the **draft DCO [APP/3.1].** As detailed in the **Design Approach Document [APP/5.7],** achieving good design has been a fundamental consideration from the outset of the Scheme. The **Design Approach Document [APP/5.7]** demonstrates how the design of the Scheme has been developed in accordance with a clear design framework, based on the criteria for good design set out in the NPS EN-1. This has included the adoption of project level design principles (Project Design Principles) to guide decision making and embed good design outcomes into the Scheme. The **oPRoWPPMP [APP/7.12]** outlines the measures to limit disruption and ensure that the PRoW network can continue to be used throughout the construction, operational, and decommissioning phases of the Scheme, while minimising the impact on PRoW users. The Scheme includes opportunities for advancement, including the proposed approximately 3785 linear metres of permissive paths within the Order limits and approximately 1203 linear metres of permissive paths outside of the Order limits. The **oPRoWPPMP [APP/7.12]** is secured via a requirement of the **draft DCO [APP/3.1].** **ES Chapter 15: Human Health [APP/6.2]** identifies and proposes measures to address the potential impacts and likely significant effects on human health of the Scheme's construction, operational, and decommissioning. The chapter concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse socio-economic related effects expected across the Scheme's construction,

		operational and decommissioning phases. There is a significant beneficial effect anticipated on: • Construction jobs for vulnerable groups as a result of the Scheme's construction phase • Provision of education, skills, training and supply chain for vulnerable groups as a result of the Scheme's construction, and operational phases • Provision of education, skills, training and supply chain for the general population as a result of the Scheme's operational phase • Physical activity for vulnerable groups as a result of the Scheme's operational phase; and • Decommissioning jobs for vulnerable groups as a result of the Scheme's decommissioning phase. **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** describes the existing levels and assesses the anticipated ecology and biodiversity effects of the Scheme's construction, operational, and decommissioning. The chapter provides an assessment of the potential effects on internationally, nationally, and locally designated sites of ecological or geological importance, on protected species, and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats. **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse ecology and biodiversity related effects expected across the Scheme's construction, operational and decommissioning phases. As a result of embedded and additional mitigation and enhancement measures, there are four direct residual significant (in EIA terms) beneficial effects as a result of the Scheme, which are anticipated in relation to the following ecological features: hedgerows and lines of trees; breeding birds – other species; overwintering birds and amphibians – Great Crested Newt. The expected residual beneficial effects outlined in **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** rely on controls established in the **oCEMP [APP/7.6]**, **oOEMP [APP/7.8]**, **oDS [APP/7.10]** and the **oLEMP [APP/7.11]** and are secured via a Requirement of the **draft DCO [APP/3.1]**. As presented in the **Biodiversity Net Gain Assessment Report [APP/7.4],** the ecological mitigation and enhancement areas will deliver a net gain of 23.46% for onsite habitats, and a net gain of 58.78% for onsite hedgerow and tree lines while a requirement of the **draft DCO [APP/3.1]** commits to delivering a minimum net gain of 10% for onsite habitats, and a net gain of 10% for onsite hedgerow and tree lines. Section 13.9 of **ES Chapter 13: Climate Change [APP/6.2]** sets out the following embedded mitigation measures to ensure the Scheme is resilient to the increased risks associated with climate change: • To mitigate against flood risk, the Contractors will monitor weather forecasts and receive EA flood alerts and plan work accordingly as set out in the **oCEMP [APP/7.6]** and **oDS [APP/7.10]**. The **oOEMP [APP/7.8]** sets out that water management will be employed to control surface water run-off and drain hardstanding and other structures. Likewise, all sensitive and electrical equipment on the PV panel will be elevated by legs or mounted on raised frames. • The **oCEMP [APP/7.6]**, the **oOEMP [APP/7.8]**, and the **oDS [APP/7.10]** all set out that the Contractor will monitor weather forecasts for any high winds to ensure the safety of staff and infrastructure where increased dust or debris could impact on works or operations.

		• Higher temperatures will also require contractor monitoring of weather forecasts to ensure works are planned accordingly. BESS equipment will also utilise HVAC cooling systems to prevent overheating in warmer weather, as outlined in the **oCEMP [APP/7.6]** and **oOEMP [APP/7.8]**. • Low precipitation and the increased risk of fire will be mitigated by the storage of water on site and a fire suppression system as set out in the **oCEMP [APP/7.6]** and the **oOEMP [APP/7.8]**. • As the development is approximately 25km from the coast, the Inspectorate agrees that significant effects from sea level rise are unlikely to occur.
Section 6: Building a strong, competitive economy. **Paragraph 85**	Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.	**ES Chapter 14: Socio-Economics [APP/6.2]** describes the existing levels and assesses the anticipated socio-economic effects of the Scheme's construction, operational, and decommissioning in accordance with this policy. **ES Chapter 14: Socio-Economics [APP/6.2]** confirms that the Site includes landholdings for agricultural business. The assessment concludes that the Scheme's construction, operational and decommissioning phases will have a minor adverse effect on land use, which is not significant in EIA terms. **ES Chapter 14: Socio-Economics [APP/6.2]** concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse socio-economic related effects expected across the Scheme's construction, operational and decommissioning phases. There is a significant beneficial effect anticipated on the provision of education, skills, training and supply chain as a result of the Scheme's construction, operational and decommissioning phases. The residual effects outlined in the **ES Chapter 14: Socio-Economics [APP/6.2]** rely on controls established within the **oCEMP [APP/7.6], oESSCS [APP/7.15], oOEMP [APP/7.8]** and the **oDS [APP/7.10]** and are secured via requirements of the **draft DCO [APP/3.1].** Section 14.11 of **ES Chapter 14: Socio-Economics [APP/6.2]** describes the existing levels and assesses the anticipated cumulative socio-economic effects of the Scheme's construction, operational, and decommissioning, in accordance with this policy. Section 14.11 concludes that there will be a major beneficial cumulative effect on the provision of education, skills, training and supply chain as a cumulative result of the Scheme's, High Grove Solar's and East Pye Solar Farm's construction, operational and decommissioning phases. The **oESSCS [APP/7.15]** outlines the Applicant's plan to actively promote work opportunities for businesses, thereby delivering local benefits. The Scheme will support a range of supply chain opportunities to local businesses. It is expected that the Scheme will utilise the local supply chain to source materials and components, foster partnerships among suppliers, manufacturers, and distributors, and, as such, stimulate economic activity within the Labour Catchment Area. The **oESSCS [APP/7.15]** sets out that the Applicant has engaged with external stakeholders to help identify key challenges in the local labour market and highlight opportunities for maximising socio-economic benefits. Continuing to work with them will ensure that the final ESSCS is grounded in local priorities, coordinated with existing initiatives, and effective in delivering lasting benefits.
Supporting a prosperous rural economy **Paragraph 88**	Planning policies and decisions should enable: a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, new buildings; b) the development and diversification of agricultural and other land-based rural businesses; c) sustainable rural tourism and leisure developments which respect the character of the countryside; and d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship	
Section 8: Promoting healthy	Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:	

and safe communities. **Paragraph 96**	a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages; b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and c) enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.	The **oPRoWPPMP [APP/7.12]** sets out the measures to limit disruption and ensure that the PRoW network can continue to be used through the construction, operational and decommissioning phases of the Scheme, whilst minimising the impact on PRoW users. The **oPRoWPPMP [APP/7.12]** outlines the measures to limit disruption and ensure that the PRoW network can continue to be used throughout the construction, operational, and decommissioning phases of the Scheme, while minimising the impact on PRoW users. The Scheme includes opportunities for advancement, including the proposed approximately 3785 linear metres of permissive paths within the Order limits and approximately 1203 linear metres of permissive paths outside of the Order limits. The **oPRoWPPMP [APP/7.12]** is secured via a requirement of the **draft DCO [APP/3.1].** Consideration for the safety and accessibility of all road users has been informed by **Figure 9.3: Public Rights of Way and Cycle Route Overview [APP/6.3],** which highlights all relevant PRoW and Cycle routes within and surrounding the Scheme. Section 1.4 of the **oPRoWPPMP [APP/7.12]** set out the following safety measures for users: • Provision of banksmen to hold vehicles when PRoW users are present, and to advise PRoW users of potential vehicle movements • Wider access tracks to create more room for PRoW users when vehicles pass them • Reduced speed limit of 5 – 10mph • Drivers will stop and give way to any PRoW user that they encounter • Appropriate signage will be installed to make PRoW users aware of construction activity, including times and the contact details for a public liaison officer • The PRoW will be kept clear of construction vehicles and apparatus outside of the permitted construction hours where practicable; and • Any damage to the PRoW will be repaired as soon as practicable. Mitigation measures for improving safety, encouraging sustainable transport, and minimising the wider network impact are outlined in the Travel Plan, which is detailed in the **oCTMP [APP/7.7]**. **ES Chapter 5: The Scheme [APP/6.1]** sets out that pole mounted internal facing closed circuit television (CCTV) systems installed at a height of up to 3m will be deployed around the perimeter of the Site. The CCTV cameras would use night-vision technology, which would be monitored remotely and avoid the need for night-time lighting of the Solar PV Site. **ES Chapter 15: Human Health [APP/6.2]** identifies and proposes measures to address the potential impacts and likely significant effects on human health of the Scheme's construction, operational, and decommissioning. The chapter concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse socio-economic related effects expected across the Scheme's construction, operational and decommissioning phases. There is a significant beneficial effect anticipated on: • Construction jobs for vulnerable groups as a result of the Scheme's construction phase • Provision of education, skills, training and supply chain for vulnerable groups as a result of the Scheme's construction and operational phases
Paragraph 102	Planning policies and decisions should promote public safety and take into account wider security and defence requirements by: a) anticipating and addressing possible malicious threats and other hazards (whether natural or man-made), especially in locations where large numbers of people are expected to congregate. Policies for relevant areas (such as town centre and regeneration frameworks), and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security. The safety of children and other vulnerable users in proximity to open water, railways and other potential hazards should be considered in planning and assessing proposals for development; and b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.	
Paragraph 103	Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well- being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.	

		• Provision of education, skills, training and supply chain for the general population as a result of the Scheme's operational phase • Physical activity for vulnerable groups as a result of the Scheme's operational phase; and • Decommissioning jobs for vulnerable groups as a result of the Scheme's decommissioning phase. The Applicant has provided an **Equality Impact Assessment [APP/7.2]** which helps to assist the Secretary of State to consider their public sector equality duty (PSED) as set out in section 149 of the Equality Act 2010 (the Act), alongside considering the potential for the Scheme to discriminate based on certain protected characteristics under the Act.
Paragraph 105	Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.	The **oPRoWPPMP [APP/7.12]** outlines the measures to limit disruption and ensure that the PRoW network can continue to be used throughout the construction, operational, and decommissioning phases of the Scheme, while minimising the impact on PRoW users. The Scheme includes opportunities for advancement, including the proposed approximately 3785 linear metres of permissive path within the Order limits and approximately 1203 linear metres of permissive paths outside of the Order limits. The **oPRoWPPMP [APP/7.12]** is secured via a requirement of the **draft DCO [APP/3.1].** As set out in the **oPRoWPPMP [APP/7.12],** the alignment of existing PRoW within the Site has been incorporated into the design of the Scheme. As such, the alignment of PRoW will be unaffected by the Scheme during the operation and maintenance phase of the Scheme. The **Design Approach Document [APP/5.7]** sets out Project Principles which have influenced the design evolution to prioritise social value and community benefits. Project Principles 2.9 and 5.10 sets out that the Scheme will consider the experience of people using the PRoW retain all PRoWs on the existing alignment during the operational phase.
Section 9: Promoting sustainable transport. **Paragraph 109**	Transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This should involve: a) making transport considerations an important part of early engagement with local communities; b) ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places; c) understanding and addressing the potential impacts of development on transport networks; d) realising opportunities from existing or proposed transport infrastructure, and changing transport technology and usage – for example in relation to the scale, location or density of development that can be accommodated; e) identifying and pursuing opportunities to promote walking, cycling and public transport use; and f) identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.	**ES Chapter 9: Transport and Access [APP/6.2]** assesses the anticipated transport and access effects of the Scheme's construction, operational, and decommissioning, in accordance with this policy. Section 9.2 of **ES Chapter 9: Transport and Access [APP/6.2]** provides a summary of the Applicant's engagement in regards to transport and access. **ES Chapter 9: Transport and Access [APP/6.2]** concludes that with the mitigation measures in place, there are no residual transport and access-related effects expected across the Scheme's construction, operational and decommissioning phases of the Scheme. By securing the mechanisms for the embedded mitigation measures as outlined in Section 9.7 of **ES Chapter 9: Transport and Access [APP/6.2]**, which are secured in the **oCEMP [APP/7.6], oCTMP [APP/7.7], oOEMP [APP/7.8], oOTMP [APP/7.9], oDS [APP/7.10],** and **oPRoWPPMP [APP/7.12]** and are secured via the requirements of the **draft DCO [APP/3.1]**, it is concluded that there are no residual effects identified for this Scheme**.** **Appendix 9.2: Traffic Assessment [APP/6.4]** has been prepared in accordance with current transport guidance. The **Traffic Assessment** demonstrates that the Scheme will not have a significant impact on the operation and safety of the surrounding highway network. The **oPRoWPPMP [APP/7.12]** outlines the measures to limit disruption and ensure that the PRoW network can continue to be used throughout the construction, operational, and decommissioning phases of the Scheme, while minimising the impact on PRoW users. The Scheme includes opportunities for advancement, including the proposed approximately 3785 linear metres of permissive path within the Order limits and approximately 1203 linear metres of permissive paths outside of the Order limits. The **oPRoWPPMP [APP/7.12]** is secured via

		a requirement of the **draft DCO [APP/3.1].** As set out in the **oPRoWPPMP [APP/7.12],** the alignment of existing PRoW within the Site has been incorporated into the design of the Scheme. As such, the alignment of PRoW will be unaffected by the Scheme during the operation and maintenance phase of the Scheme. The **Design Approach Document [APP/5.7]** sets out Project Principles which have influenced the design evolution to prioritise social value and community benefits. Project Principles 2.9 and 5.10 sets out that the Scheme will consider the experience of people using the PRoW retain all PRoWs on the existing alignment during the operational phase. An overarching strategy was devised to take access from the A1065 and move construction and operational traffic east-west through the Site, avoiding the use of rural lanes, as set out through the Project Principles 2.8 and 5.9, to consider experience of people travelling along adjacent roads, including the A1065, South Acre Road, River Road and Narford Lane and to route construction away from local villages and Swaffham town centre.
Paragraph 115	In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location; b) safe and suitable access to the site can be achieved for all users; c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.	There are no allocated sites located within or near the Order Limits, as set out in Section 3.2 of **ES Chapter 3: Order limits and Context [APP/6.1].**
Paragraph 116	Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.	**ES Chapter 9: Transport and Access [APP/6.2]** concludes that with the mitigation measures in place, there are no residual transport and access-related effects expected across the Scheme's construction, operational and decommissioning phases of the Scheme. The cumulative transport and access effects of the Scheme are set out in Section 9.11 of **ES Chapter 9: Transport and Access [APP/6.2].** Cumulative traffic flows associated with cumulative schemes, including High Grove Solar, are already inherently accounted for within the TEM Pro growth factors, which were utilised in Section 9.6 to generate the future baseline 2031 traffic flow scenario. Given that the construction of High Grove Solar is due to peak in 2028, with a 2.5-year program that is likely to be predominantly complete by 2031, when construction for the Scheme is expected to commence and peak, section 9.11 of **ES Chapter 9: Transport and Access [APP/6.2]** sets out that there are unlikely to be any cumulative effects as a result of construction. There are no relevant cumulative schemes for the operational phase, and any cumulative schemes relevant to the decommissioning phase are assumed to be mitigated through the embedded mitigation included in the **oDS [APP/7.10]**.
Paragraph 118	All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored.	Section 6.3 of the **oCTMP [APP/7.7]** states that a Travel Plan will be developed to manage the arrival and departure profiles of staff and to encourage sustainable modes of transport, particularly a shuttle bus and car-sharing. A Travel Plan Coordinator (TPC) will be appointed to oversee the implementation of the Travel Plan, whose responsibilities will comprise, but not be limited to, implementing measures outlined in the Travel Plan, raising awareness and promoting the Travel Plan, and providing advice to workers on sustainable travel options.**Appendix 9.2: Traffic Assessment [APP/6.4]** has been prepared in accordance

		with current transport guidance and assess the likely impacts of the Scheme on transport and traffic.
Section 11: Making effective use of land **Paragraph 125(a)**	Planning policies and decisions should 'encourage multiple benefits from both urban and rural land, including through […] taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation […].'	As presented in the **Biodiversity Net Gain Assessment Report [APP/7.4],** the ecological mitigation and enhancement areas will deliver a net gain of 23.46% for onsite habitats, and a net gain of 58.78% for onsite hedgerow and tree lines, while a requirement of the **draft DCO [APP/3.1]** commits to delivering a minimum net gain of 10% for onsite habitats, and a net gain of 10% for onsite hedgerow and tree lines. Maximising the restoration, creation, and enhancement of wider biodiversity has been key to the evolution of the Scheme's design. As outlined in the **oLEMP [APP/7.11]**, new habitats will be provided as part of the Scheme, with the aim of enhancing biodiversity gains, provided this does not conflict with the construction, operation, and decommissioning functions of the Scheme. Examples of habitat creation and enhancement measures to be implemented as part of the Scheme include: • Creation of new grassland habitats, including wildflower grassland • The gapping up of hedgerows and Tree Lines with additional native species • Implementation of a rotational management strategy for hedgerows; and • The selective thinning and management of vegetation associated with ponds and ditches.
Section 12: Achieving well-designed and beautiful places. **Paragraph 131**	The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.	As detailed in Section 2 of the **Planning Statement [APP/5.5]**, good design has been a fundamental consideration from the outset of the Scheme. The **Design Approach Document [APP/5.7]** illustrates how the design of the Scheme has been developed in accordance with a clear design framework, based on the criteria for good design outlined in NPS EN-1. This has included the adoption of project level design principles (Project Principles) to guide decision making and embed good design outcomes to the Scheme.
Paragraph 137	Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should, where applicable, provide sufficient information to demonstrate how their proposals will meet the design expectations set out in local and national policy, and should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.	**ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** describes the consideration of reasonable alternatives carried out by the Applicant in relation to the Site for the Scheme, layouts and choice of technology. It is supported by **Appendix 1: Site Evaluation Report** to this **Planning Statement**, which provides an appraisal of alternative sites and demonstrates consideration of relevant policy and its applicability to the site evaluation process undertaken by the Applicant. Throughout the design process, the Applicant maintained an interdisciplinary approach to design, considering both the opportunities and constraints of the Scheme. This included an analysis of the existing physical, environmental, social, and cultural context of the Site by a broad range of technical disciplines (including landscape and visual, noise, ecology, and heritage) as set out and assessed by **ES Topic Chapters [APP/6.2].** The Scheme's compliance with national policies is considered in Tables 1-4 of this **Policy Compliance Document [APP/5.6].** The Scheme's compliance with local policies is considered in Tables 5 and 6 of this **Policy Compliance Document [APP/5.6].** Engagement with key stakeholders, including the host authorities, near neighbours, and community organisations, has helped to inform the design of the Scheme and the Applicant's approach to assessing environmental effects. A summary of engagement by stakeholder

		type, and the impact of engagement on the Scheme, is provided in the **Consultation Report [APP/5.1].**
Paragraph 139	Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to: a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings	The Scheme's compliance with national policies is considered in Tables 1-4 of this **Policy Compliance Document [APP/5.6].** The Scheme's compliance with local policies is considered in Tables 5 and 6 of this **Policy Compliance Document [APP/5.6].** The **Design Approach Document [APP/5.6]** has been prepared in accordance with the Planning Inspectorate's guidance titled 'Nationally Significant Infrastructure Projects: Advice on Good Design' and sets out the design decisions taken at each step of the Scheme's development, and the rationale for these decisions, as well as the mechanisms by which good design will be secured post consent. This has included the adoption of project level design principles (Project Principles) to guide decision making and embed good design outcomes to the Scheme. Project Principles 7.1-7.3 promote the Applicant's Global Principle for sustainability, durability & reversibility.
Section 14: Meeting the challenge 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.	Section 13.9 of **ES Chapter 13: Climate Change [APP/6.2]** sets out the following embedded mitigation measures to ensure the Scheme is resilient to all climate impacts: • Higher temperatures will also require contractor monitoring of weather forecasts to ensure works are planned accordingly. BESS equipment will also use HVAC cooling systems to avoid overheating in warmer weather, as set out in the **oCEMP [APP/7.6]** and **oOEMP [APP/7.8]**. • Low precipitation and the increased risk of fire will be mitigated by the storage of water on site and a fire suppression system as set out in the **oCEMP [APP/7.6]** and the **oOEMP [APP/7.8]**. • The **oCEMP [APP/7.6]**, the **oOEMP [APP/7.8]**, and the **oDS [APP/7.10]** all set out that the Contractor will monitor weather forecasts for any high winds and storms to ensure the safety of staff and infrastructure where increased dust or debris could impact on works or operations. • To mitigate against flood risk, the Contractors will monitor weather forecasts and receive EA flood alerts and plan work accordingly as set out in the **oCEMP [APP/7.6]** and **oDS [APP/7.10]**. The **oOEMP [APP/7.8]** sets out that water management will be employed to control surface water run-off and drain hardstanding and other structures. Likewise, all sensitive and electrical equipment on the PV panel will be elevated by legs or mounted on raised frames. • As the development is approximately 25km from the coast, the Inspectorate agrees that significant effects from sea level rise are unlikely to occur. The Scheme would make a significant contribution to achieving both the national renewable energy targets and the UK's contribution to global efforts to mitigate the effects of climate change. The **Planning Statement [APP/5.5]** and the **Statement of Need [APP/5.4]** outline that the Scheme will deliver a significant amount of low-carbon, low-cost, and UK-located solar electricity generation capacity, connecting to the National Electricity Transmission System, anticipated to be operational from 2033. 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. The **Statement of Need [APP/5.4]** sets out evidence in support of ground-mounted solar electricity generation generally, and the Scheme specifically, in relation to the benefit brought towards meeting the UK's critical strategic needs, including those set out in the Clean Power 2030 Action Plan. The **Statement of Need [APP/5.4]** concludes that the decarbonisation, security of supply and affordability benefits delivered by the Scheme to address the national urgent need for low-carbon generation should be accorded substantial weight in the planning balance.
Paragraph 164	New development should be planned for in ways that: a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through incorporating green infrastructure and sustainable drainage systems; and b) help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings in plans should reflect the Government's policy for national technical standards.	The impacts associated with flooding are outlined in Section 13.9 of **ES Chapter 13: Climate Change [APP/6.2].** Contractors will monitor weather forecasts and receive EA flood alerts, and plan work accordingly, as outlined in the **oCEMP [APP/7.6]** and **oDS [APP/7.10]**. The **oOEMP [APP/7.8]** sets out that water management will be employed to control surface water run-off and drain hardstanding and other structures. Likewise, all sensitive and electrical equipment on the PV panel will be elevated by legs or mounted on raised frames. **ES Chapter 12: Water Resources [APP/6.2]** also mentions the use of techniques such as grassland under the drip lines for the PV tables to manage surface water run-off rates. **ES Chapter 13: Climate Change [APP/6.2]** concludes that the Scheme will yield a significant (in EIA terms) beneficial impact on total GHG emissions. The Applicant has provided an **Equality Impact Assessment [APP/7.2]** which helps to assist the Secretary of State to consider their public sector equality duty (PSED) as set out in section 149 of the Equality Act 2010 (the Act), alongside considering the potential for the Scheme to discriminate based on certain protected characteristics under the Act.
Paragraph 168	When determining planning applications for all forms of renewable and low carbon energy developments and their associated infrastructure, local planning authorities should: a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future; b) recognise that small-scale and community-led projects provide a valuable contribution to cutting greenhouse gas emissions; c) in the case of applications for the repowering and life-extension of existing renewable sites, give significant weight to the benefits of utilising an established site.	The **Planning Statement [APP/5.5]** and the **Statement of Need [APP/5.4]** set out the need for the Scheme and note the established need for low-carbon infrastructure as a Critical National Priority. Such schemes should be brought forwards with urgency to make tangible and essential advances in decarbonisation in the near term. 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 help to decarbonise the electricity system and lowers the market price of electricity. The urgent need for the Scheme is also established by NPS EN-1, specifically paragraphs 3.2.6–3.2.8. It is demonstrated within the **Planning Statement [APP/5.5]** that any harm caused by the Scheme is outweighed by the substantial benefits that are delivered. It is considered that even without applying the CNP presumption, the planning case is firmly in favour of development consent being granted. It is not possible to deliver solar generation of this scale - to meet the CNP - on established sites [see **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** and **Appendix 1: Site Evaluation Report** to the **Planning Statement [APP/5.5])**, but the design will ensure that over the operational lifetime of the Scheme repowering and life extension opportunities are not precluded.
Paragraph 170	Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where	**ES Chapter 12: Water Resources [APP/6.2]** confirms that the entirety of the built aspects of the Scheme (Works No. 1-10) is situated in Flood Zone 1; only a small area of the Skylark

	development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.	Mitigation Works No. 11 (approximately 1.1 ha) is within the Flood Zone 2 and 3, which will continue to be used for agricultural activities.
	Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards.	**ES Chapter 12: Water Resources [APP/6.2]** confirms that the entirety of the built aspects of the Scheme (Works No. 1-10) is situated in Flood Zone 1; only a small area of the Skylark Mitigation Works No. 11 (approximately 1.1 ha) is within the Flood Zone 2 and 3, which will continue to be used for agricultural activities; therefore, the Sequential Test is not triggered. This is supported by the updated National Planning Practice guidance on Flood Risk and coastal change. **ES Appendix 12.2: Flood Risk Assessment [APP/6.4]** outlines the Scheme's evidence and compliance with the sequential test at both the site selection and site-level stages. The assessment relies on controls established within the **oCEMP [APP/7.6], oOEMP [APP/7.8],** and **the oDS [APP/7.10].** These outline management plans and the Surface Water Drainage Strategy, which is embedded in the **FRA [APP/6.4]** set out the water-related measures to manage any potential water effects that may arise from the Scheme's construction, operational and decommissioning phases. A Surface Water Drainage Strategy (which will form part of a detailed CEMP(s)) will include details of pre-construction, construction, and post-construction water quality monitoring.
	All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by: a) applying the sequential test and then, if necessary, the exception test as set out below; b) safeguarding land from development that is required, or likely to be required, for current or future flood management; c) using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management); and d) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.	
	A sequential risk-based approach should also be taken to individual applications in areas known to be at risk now or in future from any form of flooding, by following the steps set out below.	
	Within this context the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test.	
	The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk).	
	Applications for some minor development and changes of use should also not be subject to the sequential test, nor the exception test set out below, but should still meet the requirements for site-specific flood risk assessments set out in footnote 63.	
	Having applied the sequential test, if it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives),	

	the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex 3.	
	The application of the exception test should be informed by a strategic or site-specific flood risk assessment, depending on whether it is being applied during plan production or at the application stage. To pass the exception test it should be demonstrated that: a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.	
	Both elements of the exception test should be satisfied for development to be allocated or permitted	
Paragraph 181	When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that: a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location; b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment; c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate; d) any residual risk can be safely managed; and e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.	**ES Chapter 12: Water Resources [APP/6.2]** confirms that the entirety of the built aspects of the Scheme (Works No. 1-10) is situated in Flood Zone 1; only a small area of the Skylark Mitigation Works No. 11 (approximately 1.1 ha) is within the Flood Zone 2 and 3, which will continue to be used for agricultural activities; therefore, the Sequential Test is not triggered. **ES Chapter 12: Water Resources [APP/6.2]** assess the impacts of the Scheme on water quality, water bodies or protected areas, and concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse water effects expected across the Scheme's construction, operational and decommissioning phases on water quality, water bodies or protected areas. The residual effects outlined in the assessment rely on controls established within the **oCEMP [APP/7.6], oOEMP [APP/7.8],** the **FRA [APP/6.4]** and the **oDS [APP/7.14].** These outline management plans and the Surface Water Drainage Strategy, which is embedded in the **FRA [APP/6.4]** set out the water-related measures to manage any potential water effects that may arise from the Scheme's construction, operational and decommissioning phases. As set out in the **FRA [APP/6.4],** surface water runoff from the Solar PV will be managed through Rural SuDS and Natural Flood Management techniques such as grassland/wildflower, which will act to bind soils, slow surface water and increase water quality compared to the baseline scenario. The **FRA [APP/6.4]** includes a Surface Water Drainage Strategy, which outlines how surface water runoff from the Site will be managed in accordance with national, regional, and local requirements regarding flood risk and drainage. As the Scheme does not have a detailed layout, a detailed drainage strategy cannot be provided at this stage, although the principles and design criteria presented in this document are applicable. These criteria will be applied at the detailed design phase.
Paragraph 182	Applications which could affect drainage on or around the site should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, and which are proportionate to the nature and scale of the proposal. These should provide multifunctional benefits wherever possible, through facilitating improvements in water quality and biodiversity, as well as benefits for amenity. Sustainable drainage systems provided as part of proposals for major development should:	The **FRA [APP/6.4]** includes a Surface Water Drainage Strategy, which sets out how surface water runoff from the Site will be managed in line with the national, regional and local requirements regarding flood risk and drainage. As the Scheme does not have a detailed layout, a detailed drainage strategy cannot be provided at this stage, with the principles and design criteria presented in this document. These criteria will be applied at the detailed design phase. The SuDS (which will form part of a detailed CEMP(s)) will include details of

	a) take account of advice from the Lead Local Flood Authority; b) have appropriate proposed minimum operational standards; and c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development.	pre-construction, construction, and post-construction water quality monitoring. These measures are set out in the **oCEMP [APP/7.6]** submitted with the DCO Application. Section 12.2 of **ES Chapter 12: Water Resources [APP/6.2]** confirms that the Application has engaged in pre-application discussions with the Environment Agency, the Borough Council of King's Lynn & West Norfolk and Norfolk County Council (the Lead Local Flood Authority) on the matter of water resources.

Section 15: Conserving and enhancing the natural environment.
 	
Paragraph 187A
	Planning policies and decisions should contribute to and enhance the natural and local environment by:
	
	a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
	
	b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
	
	c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
	
	d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;
	
	e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
	
	f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.
		The Scheme is temporary and reversible in nature and therefore will not affect the long-term agricultural resource. The decommissioning measures set out in the **oDS [APP/7.10]** are secured by Requirement 20(2) in Schedule 2 of the **dDCO [APP/3.1].** Section 11.7 of **ES Chapter 11: Soils and Agriculture [APP/6.2]** sets out the following embedded mitigation, outlined within the **oSMP [APP/7.13]** and secured by the requirement of the **draft DCO [APP/3.1],** during each phase of the lifetime of the Scheme to minimise damage to soil structure:
		
		• Construction phase
		  ○ Minimising or avoiding vehicle movement over soils (trafficking) when soils are in a plastic, wet state
		  ○ Only moving soils, which is only necessary for limited areas such as to build tracks, the BESS and substation areas, when soils are dry
		  ○ For the small volumes of soils that need to be stored for subsequent restoration, placing them into storage bunds when they are dry, and managing and maintaining the bunds; and
		  ○ Minimising trench widths, replacing soils in the reverse order and preventing any adverse long-term effects on land quality.
		• Operation phase
		  ○ Minimising travel over the land in vehicles when ground conditions are wet.
		• Decommissioning phase
		  ○ Following the same timing principles as are applied at the construction phase.
		
		Section 4.6 of the **oSMP [APP/7.13]** sets out the following good practice measures to avoid damage to soil structure:
		
		• Suitably qualified soil scientists will be appointed by the contractor to oversee and define all soil management good practice measures
		• Soil resources will be clearly identified (usually by texture and/or colour) to avoid mixing of topsoils with subsoils when excavating and filling the trenches
		• No trafficking of vehicles/plant or materials storage will occur on reinstated soil, wherever practicable
		• Disturbance to soils will be minimised at all stages; for example, avoiding unnecessary repeat movements over the same ground
		• The movement of vehicles and plant will be restricted to designated access and haul routes
		• Multiple handling of soils will be avoided
		• Soil handling, including tracking over the soil with machinery, will only take place in suitable soil moisture and weather conditions

		• Soils will only be stored in designated stockpiles • Long-term (over 6 months) stockpiles will be seeded to prevent wind and water erosion; and • Records of soil handling operations and stockpiles will be kept. Section 11.8 of **ES Chapter 11: Soils and Agriculture [APP/6.2]** sets out that the economic benefits of the land within the Scheme are about £100,000 per annum, as a result of the Scheme's development. Food production benefits are estimated at around 530 tonnes per annum, representing an incremental production benefit. **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** describes the existing levels and assesses the anticipated ecology and biodiversity effects of the Scheme's construction, operational, and decommissioning. The chapter provides an assessment of the potential effects on internationally, nationally, and locally designated sites of ecological or geological importance, on protected species, and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats. **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse ecology and biodiversity related effects expected across the Scheme's construction, operational and decommissioning phases. As a result of embedded and additional mitigation and enhancement measures, there are four direct residual significant (in EIA terms) beneficial effects as a result of the Scheme, which are anticipated in relation to the following ecological features: hedgerows and lines of trees; breeding birds – other species; overwintering birds and amphibians – Great Crested Newt. The expected residual beneficial effects outlined in **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** rely on controls established in the **oCEMP [APP/7.6]**, **oOEMP [APP/7.8]**, **oDS [APP/7.10]** and the **oLEMP [APP/7.11]** and are secured via corresponding requirements of the **draft DCO [APP/3.1]**. Section 7.7 of **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** outlines the mitigation measures relevant to biodiversity that are embedded in the Scheme, including but not limited to measures to prevent the accidental killing and injury of mammals, such as hedgehogs, which will be implemented during the construction and decommissioning phases. The Scheme includes measures to ensure that potential effects on light-sensitive species such as bats are fully mitigated. As presented in the **Biodiversity Net Gain Assessment Report [APP/7.4],** the ecological mitigation and enhancement areas will deliver a net gain of 23.46% for onsite habitats, and a net gain of 58.78% for onsite hedgerow and tree lines while a requirement of the **draft DCO [APP/3.1]** commits to delivering a minimum net gain of 10% for onsite habitats, and a net gain of 10% for onsite hedgerow and tree lines.
Paragraph 188	Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.	Table 7.5 of **ES Chapter 7: Biodiversity [APP/6.2]** outlines the sensitivity of identified receptors, taking into account the hierarchy between international, national, and locally designated sites. Landscape and ecological enhancements and mitigation measures for the Scheme are shown on **Appendix 1: Green Infrastructure Strategy Plans** to the **oLEMP [APP/7.11]**.
Paragraph 189	Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and	**ES Chapter 3: Order limits and Context [APP/6.1]** confirms that the Order limits have been selected and designed to avoid designated areas. The Order Limits is not covered by any statutory ecological designations, nor is it an ancient woodland. None of the land within the

	cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.	Order limits is covered by any statutory landscape designations, i.e. National Parks or National Landscapes.
Paragraph 193	When determining planning applications, local planning authorities should apply the following principles a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused; b) development on land within or outside a Site of Special Scientific Interest, 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 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 Sites of Special Scientific Interest; c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.	**ES Chapter 7: Ecology and Biodiversity [APP/6.2]** describes the existing levels and assesses the anticipated ecology and biodiversity effects of the Scheme's construction, operational, and decommissioning. The chapter provides an assessment of the potential effects on internationally, nationally, and locally designated sites of ecological or geological importance, on protected species, and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats. **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse ecology and biodiversity related effects expected across the Scheme's construction, operational and decommissioning phases. As a result of embedded and additional mitigation and enhancement measures, there are four direct residual significant (in EIA terms) beneficial effects as a result of the Scheme, which are anticipated in relation to the following ecological features: hedgerows and lines of trees; breeding birds – other species; overwintering birds and amphibians – Great Crested Newt. The expected residual beneficial effects outlined in **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** rely on controls established in the **oCEMP [APP/7.6]**, **oOEMP [APP/7.8]**, **oDS [APP/7.10]** and the **oLEMP [APP/7.11]** and are secured via corresponding requirements of the **draft DCO [APP/3.1]**. Section 7.7 of **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** outlines the mitigation measures relevant to biodiversity that are embedded into the Scheme, including but not limited to measures to prevent the accidental killing and injury of mammals, such as hedgehogs, which will be implemented during the construction and decommissioning phases. The Scheme includes measures to ensure that potential effects on light-sensitive species such as bats are fully mitigated. As presented in the **Biodiversity Net Gain Assessment Report [APP/7.4],** the ecological mitigation and enhancement areas will deliver a net gain of 23.46% for onsite habitats, and a net gain of 58.78% for onsite hedgerow and tree lines while a requirement of the **draft DCO [APP/3.1]** commits to delivering a minimum net gain of 10% for onsite habitats, and a net gain of 10% for onsite hedgerow and tree lines. Section 7.11 of **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** outlines the summary of biodiversity inter-project cumulative effects, including residual significant effects, in EIA terms. The section concludes that there is no potential for significant cumulative adverse effects to occur in combination with any of the identified cumulative schemes. **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** describes the consideration of reasonable alternatives carried out by the Applicant in relation to the Site for the Scheme, layouts and choice of technology. It is supported by **Appendix 1: Site Evaluation Report** to this **Planning Statement**, which provides an appraisal of alternative sites and demonstrates consideration of relevant policy and its applicability to the site evaluation process undertaken by the Applicant. The Site evaluation involved a number of factors, including, but not limited to environmental considerations, such as the avoidance of

		environmental constraints, such as those containing SSSIs, Nature Reserves, Ramsar Sites, Special Area of Conservation (SAC), and Special Protection Areas (SPA).
Paragraph 196	Planning policies and decisions should ensure that: a) a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation); b) after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and c) adequate site investigation information, prepared by a competent person, is available to inform these assessments.	**ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** outlines the suitability of the land for solar development, which is hindered by the lack of landscape and environmental statutory designations, limited residual receptors, and accessibility from a major highway network. It is supported by **Appendix 1: Site Evaluation Report** to this **Planning Statement**, which provides an appraisal of alternative sites and demonstrates consideration of relevant policy and its applicability to the site evaluation process undertaken by the Applicant. The Site evaluation involved a number of factors, including, but not limited to agricultural land classification and land type to minimise the impact on the best and most versatile agricultural land. **ES Chapter 11: Soils and Agriculture [APP/6.2]** does not set out any risks associated with land instability and contamination as a result of former activities. Mitigation is proposed as set out in the **oSMP [APP/7.13]** to reduce the effects on soils as a result of the Scheme. The construction, operation, and decommissioning of the Scheme is anticipated to result in a minor beneficial effect on soil resources. Further details are provided in **ES Chapter 11: Soils and Agriculture [APP/6.1]**. This Soils and Agriculture chapter has been prepared by Kernon Countryside Consultants (see **ES Appendix 1.1: Statement of Competence [APP/6.4]**). The Applicant confirmed to the HSE that Hazardous Substance Consent is not required for the Scheme because there are no in-scope hazardous substances as per Schedule 1 of The Planning (Hazardous Substances) Regulations 2015 on site. Therefore, Hazardous Substance Consent has not been considered further. Regulation 6 of the Infrastructure Planning (Decisions) Regulations 2010 is not applicable. This is set out in the **ES Appendix 2.2: Scoping Opinion Response [APP/6.4]**.
Paragraph 198	Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should: a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.	**ES Chapter 10: Noise and Vibration [APP/6.2]** considers the noise effects of the Scheme. It concludes that with the implementation of mitigation measures, significant residual adverse noise and vibration effects during the construction, operation and decommissioning of the Scheme will be avoided at sensitive receptors. The embedded and additional mitigation measures are documented within the: **oCEMP [APP/7.6], oCTMP [APP/7.7], oOEMP [APP/7.8], oOTMP [APP/7.9]** and **oDS [APP/7.10]** and are secured via requirements of the **draft DCO [APP/3.1]**. The **Statutory Nuisance Statement [APP/5.3]** concludes that the only matters addressed by the Environmental Protection Act 1990 which have been assessed as potentially being significant for the Scheme are those associated with noise, dust, health, light and vibration. It draws upon the assessment conclusions from **ES Chapter 16: Other Environmental Matters [APP/6.2]** and **ES Chapter 10: Noise and Vibration [APP/6.2]** to establish that the construction, operational, and decommissioning phases of the Scheme would not constitute a statutory nuisance, provided that the identified mitigation measures are implemented. **ES Chapter 5: The Scheme [APP/6.1]** sets out that pole mounted internal facing closed circuit television (CCTV) systems installed at a height of up to 3m will be deployed around the perimeter of the Site. The CCTV cameras would use night-vision technology, which would be monitored remotely and avoid the need for night-time lighting of the Solar PV Site.
Paragraph 199	Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should	**ES Chapter 3: Order limits and Context [APP/6.1]** confirms that the Site is not located within a Local Authority with designated Air Quality Management Areas (AQMAs) or an AQMA boundary.

	be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.	**ES Chapter 16: Other Environmental Measures [APP/6.2]** discusses potential Air Quality impacts arising as a result of the Scheme. With the measures set out in the **oCEMP [APP/7.6], oCTMP [APP/7.7]** and the **oDS [APP/7.10], ES Chapter 16: Other Environmental Measures [APP/6.2]** concludes that the Scheme is not likely to result in significant air quality effects.
Section 16: Proposals affecting heritage assets **Paragraph 207**	In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.	**ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** provides an assessment of the Scheme's impact on the historic environment, both above and below ground assets, within the Order limits, or that will be impacted by the Scheme. The Chapter describes the heritage assets within the Study Area for the Scheme and their significance, and the significance of their contribution to the setting. **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse heritage related effects expected across the Scheme's construction, operational and decommissioning phases. The embedded and additional mitigation measures are documented within the: **oCEMP [APP/7.6], oCTMP [APP/7.7], oOEMP [APP/7.8], oDS [APP/7.10],** and **oLEMP [APP/7.11]** and are secured via requirements of the **draft DCO [APP/3.1].**
Paragraph 213	Any harm to, or loss of, the 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: a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional; b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.	Section 8.6 of **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** outlines the baseline conditions of heritage assets. The section sets out the fifteen designated and other non-designated heritage assets that have been scoped in as receptors/matters for assessment. With the derivation of a heritage asset's significance in mind. The receptors/matters assessed include: changes to the setting of Listed Buildings, Conservation Areas, Scheduled Monuments, a Registered Park and Garden, The Brecks National Character Area and non-designated heritage buildings, direct physical impacts to designated heritage assets; changes to the setting of non-designated heritage assets and direct physical impacts to non-designated heritage assets. **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** outlines that 'substantial harm' is afforded to any adverse effect that is of a major magnitude whilst moderate, minor or negligible adverse effects represent effects that are of 'less than substantial harm' in nature. Given, **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse effects, and therefore it constitutes 'less than substantial harm'.
Paragraph 216	The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. 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.	**ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** provides an assessment of the Scheme's impact on the historic environment, both above and below ground assets, within the Order limits, or that will be impacted by the Scheme. The Chapter describes the heritage assets within the Study Area for the Scheme and their significance, and the significance of their contribution to the setting. **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse heritage related effects expected across the Scheme's construction, operational and decommissioning phases. The embedded and additional mitigation measures are documented within the: **oCEMP [APP/7.6], oCTMP [APP/7.7], oOEMP [APP/7.8], oDS [APP/7.10],** and **oLEMP [APP/7.11]** and are secured via requirements of the **draft DCO [APP/3.1].**

		ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2] concludes that there are no significant adverse effects anticipated on non-designated heritage assets.

Table 5 Breckland Council – Table of Compliance

Breckland Local Plan (Adopted September 2023)		
Policy	**Policy Text**	**Assessment**
GEN 01 Sustainable Development in Breckland	The Local Plan will seek and enable development that improves the economic, social and environmental objectives of Breckland through the application of the following national and locally distinctive sustainable development principles: • Mitigate and adapt to climate change; • Protect and enhance the natural, built and historic environment; • Allocate and facilitate developable land that seeks to provide access to homes, employment, retail, leisure and other facilities; • Assist in the creation and maintenance of inclusive, environmentally sustainable communities making the best and most efficient use of previously developed land, buildings and natural resources; Support Breckland's wider rural economy helping to sustain local services and assist in helping rural communities adapt and grow proportionately to enhance their social and economic sustainability; • Direct jobs and growth towards the most sustainable locations contributing towards the economy and jobs in rural areas, helping to achieve the right balance throughout the District; and • Co-ordinate development with transport provision ensuring good access to existing community facilities, services and open space, together with new facilities and services where necessary. • Consideration of the cumulative impact of development, in particular, the impact on the environment. Where there are no development plan policies relevant to the application, or the policies of most importance are out of date, the Council will grant permission, unless taking into account whether any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits when assessed against the National Planning Policy Framework, or if policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed.	Section 13.9 of **ES Chapter 13: Climate Change [APP/6.2]** sets out the following embedded mitigation measures to ensure the Scheme is resilient to the increased risks associated with climate change: • To mitigate against flood risk, the Contractors will monitor weather forecasts and receive EA flood alerts and plan work accordingly as set out in the **oCEMP [APP/7.6]** and **oDS [APP/7.10]**. The **oOEMP [APP/7.8]** sets out that water management will be employed to control surface water run-off and drain hardstanding and other structures. Likewise, all sensitive and electrical equipment on the PV panel will be elevated by legs or mounted on raised frames. • The **oCEMP [APP/7.6]**, the **oOEMP [APP/7.8]**, and the **oDS [APP/7.10]** all set out that the Contractor will monitor weather forecasts for any high winds to ensure the safety of staff and infrastructure where increased dust or debris could impact on works or operations. • Higher temperatures will also require contractor monitoring of weather forecasts to ensure works are planned accordingly. BESS equipment will also use HVAC cooling systems to avoid overheating in warmer weather, as set out in the **oCEMP [APP/7.6]** and **oOEMP [APP/7.8]**. • Low precipitation and the increased risk of fire will be mitigated by the storage of water on site and a fire suppression system as set out in the **oCEMP [APP/7.6]** and the **oOEMP [APP/7.8]**. • As the development is approximately 25km from the coast, PINS agrees that significant effects from sea level rise are unlikely to occur. **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** provides an assessment of the Scheme's impact on the historic environment, both above and below ground assets, within the Order limits, or that will be impacted by the Scheme. The Chapter describes the heritage assets within the Study Area for the Scheme and their significance, and the significance of their contribution to the setting. **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse heritage related effects expected across the Scheme's construction, operational and decommissioning phases. The embedded and additional mitigation measures are documented within the: **oCEMP [APP/7.6], oCTMP [APP/7.7], oOEMP [APP/7.8], oDS [APP/7.10],** and **oLEMP [APP/7.11]** and are secured via requirements of the **draft DCO [APP/3.1].** **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1],** sets out how previously developed land has been considered in the search for alternative sites for the Scheme through a review of the relevant local brownfield land registers. It concludes that no brownfield land sites are available at a sufficient size to accommodate the Scheme, either individually or in combination with other sites

		ES Chapter 14: Socio-Economics [APP/6.2] describes the existing levels and assesses the anticipated economic and social effects of the Scheme's construction, operational, and decommissioning. **ES Chapter 14: Socio-Economics [APP/6.2]** concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse socio-economic related effects expected across the Scheme's construction, operational and decommissioning phases. A significant beneficial effect is anticipated on the provision of education, skills, training, and the supply chain as a result of the Scheme's construction, operational, and decommissioning phases. The Scheme is expected to support 1,145 net additional jobs during the Construction Phase, with between 285 and 575 of these being taken by LCA residents. Given the rural siting of the Scheme, the Applicant has considered access points for construction and operational vehicles. Figure 21 in Section 2.3 of the **oCTMP [APP/7.7]** sets out an overview of the proposed access locations for the Scheme. Figure 41 in Section 4.1 of the **oCTMP [APP/7.7]** sets out the proposed construction routing for this Scheme. This covers both routes to/from the Scheme as well as within the Scheme. Furthermore, the Applicant has provided an **Access and Rights of Way Plan [APP/2.5]** and an **oPRoWPPMP [APP/7.12]** which set out an overview of the accessible routes and access points available to pedestrians and cyclists. As set out in **ES Chapter 2: EIA Process and Methodology [APP/6.1]**, a Cumulative Effects Assessment (CEA) has been undertaken as part of the EIA in accordance with PINS Advice on Cumulative Effects Assessment (September 2024) and has considered two types of cumulative effects. • In combination effects: the combined effect generated by individual effects on a particular receptor (presented within **ES Chapter 17: In-Combination Effects [APP/6.2]**); and • Cumulative effects: effects generated by the Scheme and other planned or approved developments on the same receptor (presented in **ES Chapters 6 to 16 [APP/6.2]**). **ES Chapter 9: Transport and Access [APP/6.2]** describes the existing levels and provides an assessment of the anticipated transport and access effects of the Scheme's construction, operational, and decommissioning phases in accordance with this policy. **ES Chapter 9: Transport and Access [APP/6.2]** aims to secure more sustainable patterns of transport through mitigation measures which are included within **the oCEMP [APP/7.6], oCTMP [APP/7.7], oOEMP [APP/7.8], oOTMP [APP/7.9], oDS [APP/7.10],** and **oPRoWPPMP [APP/7.12]** and are secured via the requirements of the **draft DCO [APP/3.1].** The Scheme's compliance with the NPPF is considered in Table 4 of this **Policy Compliance Document [APP/5.6].**
GEN 02 Promoting High Quality Design	The Council will require high quality design in all development within the District that: • respects and is sensitive to the character of the surrounding area and makes a positive architectural and urban design contribution to its context and location; • contributes positively to the public realm and public spaces, protecting the high levels of amenity and quality of life making Breckland an attractive, successful and vibrant place for residents, workers and visitors; • creates high quality, safe and sustainably designed buildings, places and streets; and	As detailed in Section 2 of the **Planning Statement [APP/5.5]**, good design has been a fundamental consideration from the outset of the Scheme. The **Design Approach Document [APP/5.7]** demonstrates how the design of the Scheme has been developed in accordance with a clear design framework, based on the criteria for good design set out in NPS EN-1. This has included the adoption of project level design principles (Project Principles) to guide decision making and embed good design outcomes to the Scheme.

	• maximises connectivity within and through a development and to the surrounding areas, including the provision of high quality and safe pedestrian and cycle routes. Innovative and contemporary design where it enhances sustainability will be encouraged and promoted across the District. Development of poor design, that does not respect or improve the character and quality of the area and the way the area functions, will be refused planning permission. The Council will produce a Supplementary Planning Document (SPD) on Design to provide detailed guidance for new development.	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). The **Works Plan [APP/2.3]** and the **Design Principles, Parameters and Commitments [APP/5.8]** secure the design of the Scheme through the **draft DCO [APP/3.1]**
Policy TR 01 Sustainable Transport Network	The Council will work in partnership to promote a safe, efficient and convenient sustainable transport system. This will be achieved through: a. supporting improvements to the road and rail connections both within the District and to the wider area; b. locating development so as to ensure wherever possible, new development is accessible to sustainable modes of transport and makes provision for improved public transport; c. promoting improved access to, and interchange between, all modes of transport to key settlements and town centres; d. reducing the need to travel by private car in towns and villages and increasing the proportion of shorter journeys made on foot or cycle; thereby providing a genuine alternative to the car and helping to facilitate a modal shift and commensurate reduction in carbon emissions; and e. promoting and improving safety, security and healthy lifestyles by encouraging walking and cycling, creating and improving links to existing routes and, for new developments, ensuring the provision of facilities such as secure, accessible bicycle parking with changing facilities on site. Development should: • seek to minimise the need to travel; • promote opportunities for sustainable transport modes; • not adversely impact on the operation or safety of the strategic road network; • improve accessibility to services; and support the transition to a low carbon future.	The Applicant highlights that permanent improvements to the road connections within the Site, the District, and the wider area are included in **ES Appendix 9.2: Traffic Assessment [APP/6.4]** which sets out works to improve these connections through measure such as improvements to the geometry of the junction onto the A1065 as well as changes to internal crossings of the droves within the Site. The Scheme aims to utilise existing access points onto the Local Road Network to minimise the associated environmental impacts; however, where this is not feasible, a new vehicle access is proposed in **ES Appendix 9.2: Traffic Assessment [APP/6.4],** which is compliant with all relevant highway safety requirements. Internal access routes will be provided to improve connectivity within the Site as highlighted by the **oCTMP [APP/7.7]** and the **oOTMP [APP/7.9]**. **ES Appendix 9.2: Traffic Assessment [APP/6.4]** confirms that there are no active passenger railway stations within the vicinity of the Site. Section 6.3 of the **oCTMP [APP/7.7]** states that a Travel Plan will be developed to manage the arrival and departure profiles of staff and to encourage sustainable modes of transport, particularly a shuttle bus and car-sharing. A Travel Plan Coordinator (TPC) will be appointed to oversee the implementation of the Travel Plan, whose responsibilities will comprise, but not be limited to, implementing measures outlined in the Travel Plan, raising awareness and promoting the Travel Plan, and providing advice to workers on sustainable travel options. Consideration for the safety and accessibility of all road users has been informed by **ES Figure 9.3: Public Rights of Way and Cycle Route Overview [APP/6.3],** which highlights all relevant PRoW and Cycle routes within and surrounding the Scheme. Section 1.4 of the **oPRoWPPMP [APP/7.12]** set out the following safety measures for users: • Provision of banksmen to hold vehicles when PRoW users are present, and to advise PRoW users of potential vehicle movements • Wider access tracks to create more room for PRoW users when vehicles pass them • Reduced speed limit of 5 – 10mph • Drivers will stop and give-way to any PRoW user that they encounter • Appropriate signage will be installed to make PRoW users aware of construction activity, including times and the contact details for a public liaison officer • The PRoW will be kept clear of construction vehicles and apparatus outside of the permitted construction hours where practicable; and • Any damage to the PRoW will be repaired as soon as practicable.

		Mitigation measures for improving safety, encouraging sustainable transport, and reducing wider network impact, are outlined in the Travel Plan which is detailed within the **oCTMP [APP/7.7]**. Section 1.5 of the **oPRoWPPMP [APP/7.12]** sets out that the Applicant has proposed approximately 3785 linear metres of permissive path within the Order limits and approximately 1203 linear metres of permissive paths outside of the Order limits. These permissive paths aim to promote walking and cycling by improving links to existing routes.
Policy TR 02 Transport Requirements	Developments should be of high quality, sustainable in design, construction and layout as well as offering maximum flexibility in the choice of travel modes for all potential users. Proposals will be permitted that: • integrate satisfactorily into existing transport networks; • 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 contributions towards, any relevant transport improvement deemed to be necessary, including those secured by legal agreement; • protect, and where possible enhance, access to public rights of way; • provide safe, suitable and convenient access for all users, including appropriate parking and servicing provision in terms of amount, design and layout (Appendix 2 provides a starting point); and • avoid inappropriate traffic generation and do not compromise highway safety. Development proposals that are likely to 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 will be caused to the efficient and safe operation of the road network and no material harm caused to the living conditions of residents. Major development proposals should include an assessment of the impacts of new development on the existing transport network; and demonstrate how they will maximise connectivity within and through a development and to the surrounding areas, including the provision of high quality and safe pedestrian and cycle routes. Where potential transport impacts are identified, developers will be expected to produce Transport Assessments to assess the impacts and identify appropriate mitigation, together with Travel Plans where appropriate.	Relevant improvements to local highways are set out in **ES Appendix 9.2: Traffic Assessment**. Paragraph 9.11.8 of the of **ES Chapter 9: Transport and Access [APP/6.2]** notes that all cumulative traffic flows associated with cumulative schemes, including High Grove Solar, are already inherently accounted for within the TEM Pro growth factors which were utilised in Section 9.6 to generate the future baseline 2031 traffic flow scenario. Paragraph 9.11.9 states that there are no relevant cumulative schemes for the Operational Phase, and that any cumulative schemes relevant to the Decommissioning Phase are assumed to be mitigated through the embedded mitigation and management plans included in the **oDS [APP/7.10]**. The Applicant has provided mitigation for any impacts on local and strategic highways as outlined in the **oCTMP [APP/7.7]** and **oOTMP [APP/7.9]**. The Applicant has provided an **oPRoWPPMP [APP/7.12]** which aims is to ensure that PRoW remain accessible and safe at all times throughout the construction, operation and maintenance, and decommissioning phases. Section 1.4 of the **oPRoWPPMP [APP/7.12]** set out the following embedded mitigation measures for the construction phase: • Provision of banksmen to hold vehicles when PRoW users are present, and to advise PRoW users of potential vehicle movements • Wider access tracks to create more room for PRoW users when vehicles pass them • Reduced speeds limit of 5 – 10mph • Drivers will stop and give-way to any PRoW user that they encounter • Appropriate signage will be installed to make PRoW users aware of construction activity, including times and the contact details for a public liaison officer; and • The PRoW will be kept clear of construction vehicles and apparatus outside of the permitted construction hours where practicable. • Any damage to the PRoW will be repaired as soon as practicable Further embedded mitigation measures that are set out for the operational phase: • Incorporation of existing PRoW into the design of the Scheme • All PRoW will have a minimum 15m buffer to any infrastructure associated with the Scheme • Maintenance activities such as periodic fence inspections, vegetation management, and permissive paths and landscape ecological mitigation maintenance; and • Where vehicles may have to cross the PRoW, these visits will be infrequent, involve a small number of daily trips, only use cars/4x4 type vehicles or small vans, and additional staff will attend for maintenance and cleaning.

		Section 9.8 of **ES Chapter 9: Transport and Access [APP/6.2]** provides an overview of the likely effects the Applicant has assessed will result from the construction, operation, and decommissioning phases of the Scheme. Where effects have been identified, embedded mitigation measures have been included to address these in the **oCEMP [APP/7.6], oCTMP [APP/7.7], oOEMP [APP/7.8], oOTMP [APP/7.9], oDS [APP/7.10],** and **oPRoWPPMP [APP/7.12]**. **ES Chapter 9: Transport and Access [APP/6.2]** concludes that with the embedded mitigation measures in place, there are no residual transport and access-related effects expected across the Scheme's construction, operational and decommissioning phases. Section 5.4 of the **oCTMP [APP/7.7]** sets out the parking provisions for the Scheme: • No on-street parking in the vicinity of the Scheme, and signs to inform contractors and visitors of this; and • Advance notice of parking facilities will be given to contractors and visitors prior to arrival. Section 9.4 of **ES Chapter 9: Transport and Access [APP/6.2]** sets out the Scheme's anticipated construction trip generation. Embedded mitigation measures are included within the **oCEMP [APP/7.6], oCTMP [APP/7.7], oDS [APP/7.10]** such as ensuring that the majority of associated vehicle trips occur outside of peak network hours (assumed as 08:00-09:00 and 17:00-18:00). Section 4 of the **oCTMP [APP/7.7]** sets out the construction vehicle routing, the agreed routing for vehicles is as agreed with NCC and NH, It is proposed for all construction vehicles and HGVs to access the Scheme from the A47 which is part of the Strategic Road Network (SRN) to the south where possible, then travel along the A1065 before entering via the relevant access point onto the A1065.These routes provide the shortest distance between various access points associated within the Scheme and SRN (A47) to prevent travel on unsuitable roads as well as avoiding material harm. The **oCTMP [APP/7.7]** includes a Travel Plan which outlines mitigation measures for improving safety, encouraging sustainable transport, and reducing wider network impact. Section 1.5 of the **oPRoWPPMP [APP/7.12]** notes that the Applicant has proposed approximately 3785 linear metres of permissive path within the Order limits and approximately 1203 linear metres of permissive paths outside of the Order limits. These permissive paths aim to provide high quality and safe pedestrian and cycle routes.
Policy ENV 01 Green Infrastructure	The network of green infrastructure in the District, including water bodies and the strategic green infrastructure corridors shown on the Policies Map, should be safeguarded, retained and, where opportunities arise, enhanced. Enhancement of the green infrastructure network will be sought through the promotion of positive action, and the development management process. New developments will be expected to exploit opportunities to incorporate green infrastructure and enhance existing connectivity; recognising the intrinsic value of the green infrastructure network and ensuring that the functionality of the network is not undermined as a result of development. Through its layout and design, new development should respond to the location of existing green infrastructure and support appropriate uses and functions. Where it is considered that the development will have a detrimental effect on the quantity or function of existing green infrastructure, compensatory provision will be required in the form of new and/or enhancements to the existing green infrastructure. Where appropriate, the Council will seek	Landscape and ecological enhancements and mitigation measures for the Scheme are shown on **Appendix 1: Green Infrastructure Strategy Plans** to the **oLEMP [APP/7.11]**. The extensive planting proposed throughout the Site, as part of the **Appendix 1: Green Infrastructure Strategy Plans** to the **oLEMP [APP/7.11],** would provide long term beneficial effects upon the landscape fabric of the Site itself. New planting and maintenance regimes outlined within the **oLEMP [APP/7.11]** would both serve to increase the sense of enclosure within the central plateau landscape. In the long term, hedgerow would be maintained to 3m in height as a minimum, with gaps infilled and additional trees planted within them, where appropriate. In the long term, the droves would become more enclosed as new planting matures and serves to reinforce the existing hedgerow and tree belts within the Site. When the operational phase ends, the Solar PV Site, including the majority of the planting, would be decommissioned and the land returned to its original use and condition, as far as practicable, and handed back to the landowner, who can then use it as they please.

	to secure through planning obligations provision for the future management and/or maintenance of green infrastructure, in accordance with Policies ENV 04 and INF 02. Developments that fail to exploit opportunities to integrate and enhance the existing local green infrastructure network will not be favourably considered. Development proposals should also have regard to Council endorsed strategic green infrastructure strategies and made neighbourhood plans when considering opportunities on site to provide connections and linkages with the wider network of green infrastructure. The absence of a detailed green infrastructure strategy for an area should not prevent the consideration of opportunities for linking strategic green areas at a higher level when preparing development proposals. As a starting point, green areas in the local vicinity of a site including designated areas of open space (in line with policy ENV 04), local green space designations, Public Rights of Way and areas protected by environmental designations should be identified to explore possible opportunities for improving connectivity between sites, where appropriate, and in the context of balancing other planning considerations for the site.	The **Design Approach Document [APP/5.7]** demonstrates how the design of the Scheme has been developed in accordance with a clear design framework, based on the criteria for good design set out in NPS EN-1. This has included the adoption of project level design principles (Project Principles) to guide decision making and embed good design outcomes to the Scheme. Project Principle 2.3 is to support objectives of Norfolk's Green Infrastructure Strategy The **oPRoWPPMP [APP/7.12]** states that there are approximately 3,785 linear metres of permissive path proposed within the Order limits. Furthermore, Paragraph 1.5.10 of the **oPRoWPPMP [APP/7.12]** states that opportunities associated with the provision of new permissive paths are outlined in the **oLEMP [APP/7.11]**. As set out in the **oPRoWPPMP [APP/7.12],** the alignment of existing PRoW within the Site has been incorporated into the design of the Scheme. As such, the alignment of PRoW will be unaffected by the Scheme during the operation and maintenance phase of the Scheme. The **Design Approach Document [APP/5.7]** sets out Project Principles which have influenced the design evolution to prioritise social value and community benefits. Project Principles 2.9 and 5.10 sets out that the Scheme will consider the experience of people using the PRoW retain all PRoWs on the existing alignment during the operational phase.
Policy ENV 02 Biodiversity protection and enhancement	The highest level of protection will be given to European Sites, with development only permitted where the proposal is in accordance with the requirements of the Conservation of Habitats and Species Regulations 2017. Where measures to mitigate for potential adverse effects on European sites are required, the proposed mitigation measures must be justified as fit for purpose with appropriate evidence, to inform the Council's Habitats Regulations Assessment. Development likely to have an adverse effect (either directly or indirectly) on a site of national, regional or local biodiversity, or geological interest, as identified on the Policies Map, will not be permitted unless: a. it can be clearly demonstrated that there are reasons for the proposal that outweigh the need to safeguard the special ecological / geological interest of the site, and; b. it has been demonstrated, where development would result in significant harm, that it cannot be reasonably located on an alternative site that would result in less or no harm, and; c. residual harm, after all measures to prevent and adequately mitigate have been applied, will be adequately compensated for. Where the Council considers that a designated site, protected species or any species or habitat, particularly where listed as a Priority Habitat or Species under Section 41 of the Natural Environment and Rural Communities Act (2006), may be adversely affected by a development proposal, an ecological assessment (EclA) will be required to be submitted with the planning application to assess effects on flora and fauna, commensurate with the scale of the impact and the importance of the species. In accordance with the stepwise approach to protecting biodiversity (the mitigation hierarchy), all development with the potential to affect biodiversity should demonstrate how such effects have been considered, by firstly demonstrating how effects have been avoided, and then how effects that cannot be avoided have been minimised. Residual harm, after all	**ES Chapter 7: Ecology and Biodiversity [APP/6.2]** describes the existing levels and assesses the anticipated ecology and biodiversity effects of the Scheme's construction, operational, and decommissioning. The chapter provides an assessment of potential effects on internationally, nationally and locally designated sites of ecological or geological importance, on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats. **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse ecology and biodiversity related effects expected across the Scheme's construction, operational and decommissioning phases. As a result of embedded and additional mitigation and enhancement measures, there are four direct residual significant (in EIA terms) beneficial effects as a result of the Scheme, which are anticipated in relation to the following ecological features: hedgerows and lines of trees; breeding birds – other species; overwintering birds and amphibians – Great Crested Newt. The expected residual beneficial effects outline in **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** rely on controls established in the **oCEMP [APP/7.6]**, **oOEMP [APP/7.8]**, **oDS [APP/7.10]** and the **oLEMP [APP/7.11]** and are secured via a Requirement of the **draft DCO [APP/3.1]**. As presented in the **Biodiversity Net Gain Assessment Report [APP/7.4],** the ecological mitigation and enhancement areas will deliver a net gain of 23.46% for onsite habitats, and a net gain of 58.78% for onsite hedgerow and tree lines while a requirement of the **draft DCO [APP/3.1]** commits to delivering a minimum net gain of 10% for onsite habitats, and a net gain of 10% for onsite hedgerow and tree lines. **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** recognises that Breckland SPA is a receptor of international importance (very high sensitivity) sited outside of the Order limits, located approximately 2.6km southwest of the Scheme. Accordingly, the designation is located over 2.5km from the Site such that no direct effects are anticipated, resulting in a negligible magnitude of impact and a Negligible effect, which is not significant. Accordingly,

	measures to prevent and adequately mitigate have been applied, must be adequately compensated for. All development should demonstrate how net gains for biodiversity are being secured as part of the development, proportionate to the scale of development and potential impacts (if any). Where development is permitted, the authority will consider the need for conditions or planning obligations to ensure the protection and enhancement of the site's nature conservation and / or geological interest. Wherever a proposed development may have a detrimental impact upon a designated site or protected species, appropriate conditions and/or planning obligations will be used to ensure that the appropriate mitigation measures incorporated within the proposal are fully implemented, and monitored where required. Policy ENV03 outlines specific requirements that apply to The Breckland Special Protection Area.	no significant adverse effects on Breckland SPA are anticipated as a result of the construction, operational and decommissioning phases of the Scheme.
Policy ENV 05 Protection and Enhancement of the Landscape	The landscape of the District is valued for, its benefit to the rural character and in the interests of biodiversity, geodiversity and historic conservation. Development proposals will be expected to contribute to and where possible enhance the local environment by recognising the intrinsic character and beauty of the countryside. Development should have particular regard to maintaining the aesthetic and biodiversity qualities of natural and man-made features within the landscape, including a consideration of individual or groups of natural features such as trees, hedges and woodland or rivers, streams or other topographical features. Development proposals will have regard to the findings of the Council's Landscape Character Assessment (LCA) and Settlement Fringe Landscape Assessment. Development should also be designed to be sympathetic to landscape character. High protection will be given to The Brecks landscape, reflecting its role as a regionally significant green infrastructure asset. Proposals within The Brecks Landscape Character Areas will not be permitted where these would result in harm to key visual features of the landscape type, other valued components of the landscape, or where proposals would result in an unacceptable change in the landscape character. High protection will also be given to the river valleys and chalk rivers in Breckland as identified in the Landscape Character Assessment, recognising their defining natural features, rich biodiversity and the undeveloped character of their shallow valleys.	**ES Chapter 6: Landscape and Visual [APP/6.2]** provides an assessment of the Scheme's impact on landscape and visual receptors and identifies construction, operational phase (short, medium and long term) and decommissioning as the phases for assessment across the Scheme. **ES Chapter 6: Landscape and Visual [APP/6.2]** concludes the following significant residual adverse impacts: • D1: Swaffham Heath LCA: there are moderate adverse effects across all phases of the Scheme. • E6: North Pickenham Plateau LCA: there are moderate adverse effects across all phases of the Scheme. • VRG1: Central Site Area: there are major-moderate adverse effects across construction, decommissioning, and operational (short and medium term) phases of the Scheme. • VRG2: North-Eastern Site Area: there are major-moderate adverse effects across construction, decommissioning, and operational (short and medium term) phases of the Scheme. • VRG3: Nar Valley Southern Slope and Settlement Edge of South Acre: there are moderate adverse effects across construction, decommissioning, and operational (short term) phases of the Scheme. • The Peddars Way and Norfolk Coastal Path: there are moderate adverse effects across construction, decommissioning phases of the Scheme. • The Peddars Way and Norfolk Coastal Path, Over a limited extent only. Within and up to 300m from the Site: there are moderate adverse effects across the operational (short and medium term) phase of the Scheme. • Rebellion Way Cycle Route: there are moderate adverse effects across construction, decommissioning phases of the Scheme. • Rebellion Way Cycle Route, Over a limited extent only. Within the Site: there are moderate adverse effects across the operational (short and medium term) phase of the Scheme. The mitigation hierarchy has been applied throughout the design and development of the Scheme landscape and visual impacts have been minimised as far as practicable. The residual effects above cannot be mitigated further. Through the application of good design principles including the application of the mitigation hierarchy, a robust approach to secure

		good design would be achieved. Despite this approach, some significant residual visual effects would remain to two landscape receptors as summarised above. Paragraph 5.10.35 of NPS EN-1 confirms that "*The scale of energy projects means that they will often be visible across a very wide area. The Secretary of State should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project*." The extensive planting proposed throughout the Site, as part of the **Appendix 1: Green Infrastructure Strategy Plans** to the **oLEMP [APP/7.11]**, would provide long term beneficial effects upon the landscape fabric of the Site itself. New planting and maintenance regimes outlined within the **oLEMP [APP/7.11]** would both serve to increase the sense of enclosure within the central plateau landscape. In the long term, hedgerow would be maintained to 3m in height as a minimum, with gaps infilled and additional trees planted within them, where appropriate. In the long term, the droves would become more enclosed as new planting matures and serves to reinforce the existing hedgerow and tree belts within the Site. When the operational phase ends, the Solar PV Site, including the majority of the planting, would be decommissioned and the land returned to its original use and condition, as far as practicable, and handed back to the landowner, who can then use it as they please. Section 6.11 of **ES Chapter 6: Landscape and Visual [APP/6.2]** describes the existing levels and assesses the anticipated cumulative landscape and visual effects of the Scheme's construction, operational (short, medium and long term), and decommissioning, in accordance with this policy. **ES Chapter 6: Landscape and Visual [APP/6.2]** concludes the following significant residual adverse cumulative impacts, cumulatively with High Grove Solar: • E6: North Pickenham Plateau LCA: there are significant adverse effects across all phases of the two developments. • VRG4: Great Palgrave and Little Palgrave: there are significant adverse effect for users of PRoW Sporle with Palgrave BR5 across the construction and decommissioning phases of the two developments. With the critical and urgent need for the Scheme enshrined in national and local policy, it is considered that the identified residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case in accordance with Paragraphs 5.10.12, 5.10.14 and 5.10.35 of NPS EN-1. The **Design Approach Document [APP/5.7]** sets out Project Principles which have influenced the design evolution to avoid and minimise harm on landscape. Project Principles 2.1 sets out that the Scheme should respond to the character of the Site, informed by the Breckland Local Landscape Character Assessment.
Policy ENV 06 Trees, Hedgerows and Development	Trees and significant hedge and shrub masses form part of the green infrastructure network and should be retained as an integral part of the design of development except where their long-term survival would be compromised by their age or physical condition, or there are exceptional and overriding benefits in accepting their loss. Development requiring the loss of a protected tree or hedgerow (including preserved trees, protected hedgerows, trees in Conservation Areas, ancient trees, aged and veteran trees and trees classified as being of categories A or B in value (BS5837:2012) will only be permitted where:	The ES is supported by extensive survey works which include **ES Appendix 16.4: Arboricultural Impact Assessment [APP/6.4].** **ES Chapter 7: Ecology and Biodiversity [APP/6.2]**, sets out that the design of the Scheme has evolved to avoid impacts and effects on ecology and biodiversity as far as practicable. The Scheme incorporates a number of enhancements resulting in a number of significant beneficial effects, including (but not limited to) long-term beneficial effects at the local level in relation to hedgerow and woodland habitats, as a result of the proposed hedgerow, woodland and tree planting set out in the **oLEMP [APP/7.11].**

	a) it would allow for a substantially improved overall approach to the design and landscaping of the development that would outweigh the loss of any tree or hedgerow. Where the loss of such features is demonstrably unavoidable, adequate replacement provision, preferably by native species will be sought (MM130). Where the loss of a tree is accepted in these circumstances, developers will be required to ensure the loss is suitably compensated for, taking into account the size and condition of the tree. **Development Affecting Trees and Hedgerows** Where a proposed development retains existing trees and hedgerows on-site, or where development occurs within a tree root protection area, provision must be made for their care and protection throughout the duration of the development with mitigation measures being put in place to ensure that development works do not have a harmful impact on existing trees. To ensure that tree cover and habitat is retained, it is important that both the short term and long term impacts that a development may have on trees is evaluated at the earliest opportunity. Accordingly the Council may require that a Tree Survey, Arboricultural Impact Assessment, Tree Protection Plan and Method Statement be undertaken by a suitably qualified professional in accordance with BS5837:2012.	The minimum offsets from the perimeter fencing surrounding the Solar PV development are set out in the **Design Approach Document [APP/5.7].** 8m offsets are secured for hedgerows and 10m offsets are secured for hedgerows with trees. A 10m offset is secured for individual trees and groups of trees. For Veteran and Ancient trees, a buffer of 15x width of tree stem 15x width of tree stem diameter is secured. Principle 2.1 sets out that the Scheme will respond to the character of the Site, informed by the Breckland Local Landscape Character Assessment. Opportunities to conserve and enhance the character of the landscape set out in the Breckland Landscape Character Assessment include but is not limited to the: • Retention of woodland blocks which provide an important focus in the landscape; and planting of additional woodland to reinforce existing farm woodlands (providing continuity of tree cover) whilst, overall, retaining the openness and historic field structure of the arable landscape. • Conservation of the well treed hedgerows concentrated on the network of rural roads and lanes, in addition to localised enclosed lanes, which impart a historic character to the landscape and provide evidence of the former landcover pattern. This extends to the droves as important routes (now restricted byways) that cross the Site. • Succession planting of new hedgerow trees and reinforcement of field boundary hedgerows, particularly where field boundaries are degraded or have been lost due to agricultural intensification, improving the integrity of the landscape and strengthening character. • Retention and conservation of mature / veteran trees which have significant landscape, biodiversity and amenity value.
Policy ENV 07 Designated Heritage Assets	The significance of designated heritage assets (including their settings), such as listed buildings, scheduled monuments, registered parks and gardens and conservation areas, will be conserved, or wherever possible enhanced. Great weight shall be given to their conservation. Proposals that may affect the significance of a designated heritage asset will be required to provide proportionate evidence to the assets importance, sufficient to identify its significance, including any contribution that its setting makes to enable any impact to be fully assessed, in accordance with national policy. Development that will affect any designated heritage asset will be subject to comprehensive assessment and should conserve or, wherever possible, enhance the architectural and historic character, appearance and setting of the asset. Where a proposed development will affect the character or setting of a Listed Building, particular regard will need to be given to the protection, conservation and potential enhancement of any features of historic or architectural interest; including within the curtilage of a listed building that predates 1st July 1948. The conversion of listed buildings for economic or residential purposes in locations that would otherwise be unacceptable will be considered where this would ensure the retention and ongoing conservation of the building. Proposals will be considered having regard to national policy and relevant guidance.	Section 8.6 of **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** outlines the baseline conditions of heritage assets. The section sets out the fifteen designated and other non-designated heritage assets that have been scoped in as receptors/matters for assessment. With the derivation of a heritage asset's significance in mind. The receptors/matters assessed include: changes to the setting of Listed Buildings, Conservation Areas, Scheduled Monuments, a Registered Park and Garden, The Brecks National Character Area and non-designated heritage buildings, direct physical impacts to designated heritage assets; changes to the setting of non-designated heritage assets and direct physical impacts to non-designated heritage assets. **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** provides an assessment of the Scheme's impact on the historic environment, both above and below ground assets, within the Order limits, or that will be impacted by the Scheme. The Chapter describes the heritage assets within the Study Area for the Scheme and their significance, and the significance of their contribution to the setting. **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse heritage related effects expected across the Scheme's construction, operational and decommissioning phases. The embedded and additional mitigation measures are documented within the: **oCEMP [APP/7.6], oCTMP [APP/7.7], oOEMP [APP/7.8], oDS [APP/7.10],** and **oLEMP [APP/7.11]** and are secured via requirements of the **draft DCO [APP/3.1].** **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** outlines that 'substantial harm' is afforded to any adverse effect that is of a major magnitude whilst moderate, minor

		or negligible adverse effects represent effects that are of 'less than substantial harm' in nature. Given**, ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse effects, it constitutes 'less than substantial harm'.
Policy ENV 08 Non-Designated Heritage Assets	Development should be expected to conserve, or wherever possible enhance the historic character, appearance and setting of non-designated historic assets. Proposals that could affect previously unrecognised heritage assets will be expected, through agreement with the Council, to undergo an appropriate assessment, proportionate to the significance of the asset. The assessment must provide sufficient information for any impact to be fully assessed. In weighing applications that are likely to directly or indirectly affect non-designated heritage assets, a balanced judgement will be undertaken, having regard to the scale of any harm or loss and the significance of the heritage asset. The conversion of non-designated buildings identified in the Norfolk Historic Environment Record, or through Neighbourhood Plans, of particular architectural or historic merit for economic or residential purposes in locations that would otherwise be unacceptable will be considered where this would ensure the retention of the building. Proposals will be considered having regard to relevant national policy and relevant guidance. In the case of traditional dwellings which positively contribute to the character of Breckland, applications for replacement will be expected to be accompanied by a Design and Access Statement which includes a structural survey that demonstrates that the demolition is necessary and that there is no alternative and viable solution of renovation to provide an acceptable standard of accommodation. Development proposals should identify assets of archaeological significance. An archaeological evaluation will be required for development sites that are known or thought to have the potential to include non-designated heritage assets with archaeological interest. Where appropriate, archaeological remains should be left in situ following further design/engineering work. If the benefits of a particular development are considered to outweigh the importance of retaining archaeological remains in situ, satisfactory excavation and recording of remains will be required before development is begun.	**ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** provides an assessment of the Scheme's impact on the historic environment, both above and below ground assets, within the Order limits, or that will be impacted by the Scheme. The Chapter describes the heritage assets within the Study Area for the Scheme and their significance, and the significance of their contribution to the setting. **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse heritage related effects expected across the Scheme's construction, operational and decommissioning phases. The embedded and additional mitigation measures are documented within the: **oCEMP [APP/7.6], oCTMP [APP/7.7], oOEMP [APP/7.8], oDS [APP/7.10],** and **oLEMP [APP/7.11]** and are secured via requirements of the **draft DCO [APP/3.1].** **ES Chapter 8: Cultural Heritage and Archaeology [APP/6.2]** concludes that there are no significant adverse effects anticipated on non-designated heritage assets. **ES Appendix 8.6: Archaeological Trial Trenching Report [APP/6.4]** has been produced in support of this DCO Application. A detailed Archaeological Mitigation Strategy is to be drafted in accordance with the **ES Appendix 8.7: outline Archaeological Mitigation Strategy [APP/6.4]** and submitted to and approved by BC and is secured via a requirement of the **draft DCO [APP/3.1].**
Policy ENV 09 Flood Risk & Surface Water Drainage	All new development will: • be located to minimise the risk of flooding, mitigating any such risk through design and implementing sustainable drainage (SuDS) principles. • incorporate appropriate surface water drainage mitigation measures to minimise its own risk of flooding and should not materially increase the flood risk to other areas. Particular care will be required in relation to habitats designated as being of international importance in the area and beyond which are water sensitive, as well as habitats designated of regional or local importance. Developers will be required to show that the proposed development would: i. not increase green field run off rates and vulnerability of the site, or the wider catchment, to flooding from surface water run-off from existing or predicted water flows; ii. wherever practicable, have a positive impact on the risk of surface water flooding in the surrounding area adjacent to the development; and	**ES Chapter 12: Water Resources [APP/6.2]** confirms that the entirety of the built aspects of the Scheme (Works No. 1-10) is situated in Flood Zone 1; only a small area of the Skylark Mitigation Works No. 11 (approximately 1.1 ha) is within the Flood Zone 2 and 3, which will continue to be used for agricultural activities; therefore, the Sequential Test is not triggered. **ES Chapter 12: Water Resources [APP/6.2]** assess the impacts of the Scheme on water quality, water bodies or protected areas, and concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse water effects expected across the Scheme's construction, operational and decommissioning phases on water quality, water bodies or protected areas. The residual effects outlined in the assessment rely on controls established within the **oCEMP [APP/7.6], oOEMP [APP/7.8], the FRA [APP/6.4]** and the **oDS [APP/7.10].** These outline management plans and the Surface Water Drainage Strategy, which is embedded in the **FRA [APP/6.4]** set out the water-related measures to manage any potential water effects that may arise from the Scheme's construction, operational and decommissioning phases.

	iii. address potential impact of infiltration upon groundwater Source Protection Zones and/or Critical Drainage Catchments. This will be minimised through the installation of infiltration and attenuation measures to dispose of surface water in accordance with sustainable drainage system (SuDS) principles and the refinements to, and evolution of, the technical evidence base and guidance (as may be updated and superseded over the life of this Plan). Proposals for vulnerable development in medium (zone 2) and higher flood risk areas (zones 3a and 3b) must be accompanied by a site-specific flood risk assessment, clearly identifying whether the development will be safe for its lifetime, taking account of the vulnerability of its users, and whether there may be any potential increase or reduction in flood risk elsewhere. In line with the sequential test, areas of functional floodplain should be protected from development. Where possible, through proposals for re-development, opportunities to reinstate areas of functional flood plain should be taken (e.g. reducing building footprints or relocating to lower flood risk zones). Consideration should be given to assessing opportunities to undertake river restoration and enhancement as part of a development to make space for water. Enhancement opportunities for renewing assets will be encouraged, where viable (e.g de-converting, the use of bio-engineered river walls, raising bridge so fits to take into account climate change). Any proposals for enhancement and restoration of the river corridor should be subject to consultation with Norfolk County Council as Lead Local Flood Authority, and in relevant cases with neighbouring authorities. In the case of major development on unallocated sites, if the sequential test shows that it isn't possible to use an alternative site, the applicant will need to submit an additional exception test in line with national policy on Flood Risk Assessments. All applications should reflect best practice and the Lead Local Flood Authority (LLFA) guidance, and any updated version (currently April 2017) providing the appropriate information required to assist in the determination of such application as issued by the LLFA. This includes the requirement to provide details of means of adoption and maintenance of the systems over the lifetime of the development at the pre-application stage. In adherence with this guidance, drainage strategies must also consider the potential increase in the volume of run-off from a development as a result of increases in the area of impermeable surfaces. Although run-off rates may be restricted to equivalent greenfield rates, the duration over which the site could discharge at this rate is likely to increase.	As set out in the **FRA [APP/6.4],** surface water runoff from the Solar PV will be managed through Rural Sustainable Drainage Systems and Natural Flood Management techniques such as grassland/wildflower, which will act to bind soils, slow surface water and increase water quality compared to the baseline scenario. The **FRA [APP/6.4]** includes a Surface Water Drainage Strategy, which sets out how surface water runoff from the Site will be managed in line with the national, regional and local requirements regarding flood risk and drainage. As the Scheme does not have a detailed layout, a detailed drainage strategy cannot be provided at this stage, with the principles and design criteria presented in this document. These criteria will be applied at the detailed design phase and the detailed SuDS is secured in the DCO through a Requirement of the **draft DCO [APP/3.1].** The SuDS (which will form part of a detailed CEMP(s)) will include details of pre-construction, construction, and post-construction water quality monitoring. These measures are set out in the **oCEMP [APP/7.6]** submitted with the DCO Application. The **Design Approach Document [APP/5.7]** includes the adoption of project level design principles (Project Principles) to guide decision making and embed good design outcomes to the Scheme. Principles 4.3 ensures the Scheme is resilient to flooding and does not increase flooding elsewhere. The **Design Principles, Parameters and Commitments [APP/5.8]** document requires the Applicant at the detailed design stage to further consider water runoff with respect to: • the final location of the BESS Compound and layout of the BESS Containers. • the final location of the Customer Substation Compound and layout; and • the final location of the National Grid Substation Compound and layout.
Policy ENV 10 Renewable Energy Development	The Council supports proposals for new renewable energy and low carbon development, subject to consideration of the impact of the development and whether this can be made acceptable. Proposals will be considered having regard to the extent to which there are: i. adverse impacts on the local landscape, townscape or designated and non-designated heritage assets assessed in line with Policies ENV 05, ENV 07 and ENV 08 in the plan; ii. adverse effects on residential amenity by virtue of outlook / overbearing impact, traffic generation, noise, vibration, overshadowing, glare or any other associated detrimental emissions, during construction, operation and decommissioning; iii. an irreversible loss of the highest quality agricultural land; iv. cumulative impacts of renewable energy development on an area; and	As set out in Section 10 of the **Planning Statement [APP/5.5],** it is considered that the wider benefits of the Scheme as CNP infrastructure, delivery of a significant level of low carbon energy generation and biodiversity net gain and the provision of permissive paths outweigh the adverse residual effects of the Scheme. Therefore, the Scheme is considered acceptable in terms of its overall landscape, visual and residential amenity impacts and that the nature of the visual impacts are not considered to outweigh the substantial benefits of the Scheme. **ES Chapter 6: Landscape and Visual [APP/6.2]** provides an assessment of the Scheme's impact on landscape and visual receptors and identifies construction, operational phase (short, medium and long term) and decommissioning as the phases for assessment across the Scheme. **ES Chapter 6: Landscape and Visual [APP/6.2]** concludes the following significant residual adverse impacts:

	v. adverse impacts upon designated wildlife sites; nature conservation interests; and biodiversity, assessed in line with Policies ENV 02 and ENV 03 in the plan. Proposals will be permitted where the impact is, or can be made, acceptable. Applications will be expected to demonstrate that any adverse impacts can be mitigated. Proposals for renewable energy development including the landward infrastructure for offshore renewable schemes requiring planning permission will be assessed to determine whether the benefits they bring in terms of the amount and usability of energy generated outweigh any adverse impacts. When attributing weight to any harm, in addition to other relevant policies in the Local Plan, regard will be given to national policy and guidance, statutory duty and legislation which seeks protection and enhancement of the landscape; designated and non-statutory heritage assets. Where appropriate the authority will consider the need for planning conditions requiring the decommissioning and removal of all plant and ancillary equipment, and if necessary the restoration of land, on the cessation of use. **Solar Energy Development** The effective use of land by focusing large scale solar farms on previously developed and non-agricultural land, will be encouraged provided that it is not of high environmental value. Particular factors that the Council will need to consider where a proposal involves greenfield land include: • the proposed use of any agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land, where possible; and • that the proposal allows for continued agricultural use where applicable and/or encourages biodiversity improvements around arrays.	• D1: Swaffham Heath LCA: there are moderate adverse effects across all phases of the Scheme. • E6: North Pickenham Plateau LCA: there are moderate adverse effects across all phases of the Scheme. • VRG1: Central Site Area: there are major-moderate adverse effects across construction, decommissioning, and operational (short and medium term) phases of the Scheme. • VRG2: North-Eastern Site Area: there are major-moderate adverse effects across construction, decommissioning, and operational (short and medium term) phases of the Scheme. • VRG3: Nar Valley Southern Slope and Settlement Edge of South Acre: there are moderate adverse effects across construction, decommissioning, and operational (short term) phases of the Scheme. • The Peddars Way and Norfolk Coastal Path: there are moderate adverse effects across construction, decommissioning phases of the Scheme. • The Peddars Way and Norfolk Coastal Path, Over a limited extent only. Within and up to 300m from the Site: there are moderate adverse effects across the operational (short and medium term) phase of the Scheme. • Rebellion Way Cycle Route: there are moderate adverse effects across construction, decommissioning phases of the Scheme. • Rebellion Way Cycle Route, Over a limited extent only. Within the Site: there are moderate adverse effects across the operational (short and medium term) phase of the Scheme. The mitigation hierarchy has been applied throughout the design and development of the Scheme landscape and visual impacts have been minimised as far as practicable. The residual effects above cannot be mitigated further. Through the application of good design principles including the application of the mitigation hierarchy, a robust approach to secure good design would be achieved. Despite this approach, some significant residual visual effects would remain to two landscape receptors as summarised above. Paragraph 5.10.35 of NPS EN-1 confirms that "*The scale of energy projects means that they will often be visible across a very wide area. The Secretary of State should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project*." The Applicant has prepared and submitted a **Statutory Nuisance Statement [APP/5.3]** as is required under APFP Regulation 5(2)(f) and Paragraph 4.15.5 of NPS EN-1. The **Statutory Nuisance Statement [APP/5.3]** draws upon the assessment conclusions from **ES Chapter 16: Other Environmental Matters** and **ES Chapter 10: Noise and Vibration [APP/6.2]** to set out that the construction, operational and decommissioning phases of the Scheme would not cause a statutory nuisance. **ES Chapter 10: Noise and Vibration [APP/6.2]** presents a noise assessment in accordance with the requirements of this policy, including a description of the noise generating aspects of the Scheme. It considers the noise effects of the Scheme. It concludes that with the implementation of mitigation measures significant residual adverse noise and vibration effects during the construction, operation and decommissioning of the Scheme will be avoided at sensitive receptors. The embedded and additional mitigation measures are documented within the: **oCEMP [APP/7.6], oCTMP [APP/7.7], oOEMP [APP/7.8], oOTMP [APP/7.11]** and **oDS [APP/7.10]** and are secured via requirements of the **draft DCO**

		[APP/3.1]. Mitigation measures are summarised in Section 10.7 of **ES Chapter 10: Noise and Vibration [APP/6.2]**. The expected trip generation from this Scheme is set out in Section 9.4 of **ES Chapter 9: Transport and Access [APP/6.2]**. Section 5.5 of the **oCTMP [APP/7.77]** sets out the Delivery Management mitigation measures. Construction vehicles will avoid travel during the morning and evening peak hours of the network, where possible. Therefore, deliveries will be arranged to occur after 09:00 and before 17:00. Section 4 of the **oCTMP [APP/7.7]** sets out the construction vehicle routing, the agreed routing for vehicles is as agreed with NCC and NH. It is proposed that all construction vehicles and HGVs access the Scheme from the A47, which is part of the Strategic Road Network (SRN) to the south, where possible, then travel along the A1065 before entering via the relevant access point onto the A1065. These routes provide the shortest distance between various access points associated within the Scheme and SRN (A47) to prevent travel on unsuitable roads as well as avoiding material harm. Trips largely occur outside of peak network hours, as mentioned above. **ES Chapter 16: Other Environmental Matters [APP/6.2]** assess glint and glare effects in respect of those matters that are scoped in. The locations of relevant receptors are shown within the supporting **ES Appendix 16.2: Solar Photovoltaic Glint and Glare Study [APP/6.4].** **ES Chapter 16: Other Environmental Matters [APP/6.2]** concludes that, with embedded mitigation measures in place, there is no potential for significant glint and glare effects as a result of the Scheme's construction, operational and decommissioning phases. Agricultural land quality was a key consideration in the Applicant's site selection process. As set out in **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]**, the Applicant has sought to identify non-BMV agricultural land in its site selection for the Scheme. Appendix 1 of the **Planning Statement [APP/5.5]** provides an overview of the site evaluation process, which sets out that the Site's suitability is due to the lack of landscape and environmental statutory designations, limited residential receptors, the absence of BMV on the published "provisional" ALC maps, and the Likelihood of BMV maps and accessibility from a major highway network. However, the Applicant has now undertaken a soil classification survey and subsequent detailed ALC survey set out in **ES Appendix 11.2: Agricultural Land Classification [APP/6.4]** which have identified areas of grade 1, 2, and 3a, contrary to the expectations of the published information. The Scheme is mostly temporary and reversible in nature and therefore will have a low magnitude affect the long-term agricultural resource. When the operational phase ends, the Solar PV Site would be decommissioned and the land returned to its original use and condition as far as practicable and returned to the landowner. The National Grid Substation and the Grid Connection Infrastructure would remain in situ as these assets will form part of the NETS. The decommissioning measures set out in the **oDS [APP/7.10]** are secured by Requirement 20(2) in Schedule 2 of the **draft DCO [APP/3.1]**. Section 11.8 of **ES Chapter 11: Soils and Agriculture [APP/6.2]** sets out that works and the loss of BMV land are temporary and reversible, therefore there is no irreversible loss of the highest quality agricultural land. 96.1% of the land within the Scheme is classed as agricultural, as set out in Section 11.6 of **ES Chapter 11: Soils and Agriculture [APP/6.2]**. **ES Chapter 4: Reasonable Alternatives and Design Evolution [APP/6.1]** sets out the suitability of the land for solar development is due to the lack of landscape and environmental statutory designations, limited residual receptors and accessibility from a major highway network. Furthermore,

		Section 11.8 of **ES Chapter 11: Soils and Agriculture [APP/6.2]** sets out that works and the loss of BMV land are temporary and reversible, therefore there is no irreversible loss of the highest quality agricultural land. Section 11.8 of **ES Chapter 11: Soils and Agriculture [APP/6.2]** sets out that some agricultural activities such as livestock grazing has the potential to continue and expand, under and around the PV panels. Furthermore, the Applicant has also set out that the loss of BMV land is reversible, therefore the land can be returned to agricultural land use after the decommissioning of the Scheme. As set out in **ES Chapter 2: EIA Process and Methodology [APP/6.1]**, a Cumulative Effects Assessment (CEA) has been undertaken as part of the EIA in accordance with PINS Advice on Cumulative Effects Assessment (September 2024) and has considered two types of cumulative effects: • In combination effects: the combined effect generated by individual effects on a particular receptor (presented within **ES Chapter 17: In-Combination Effects [APP/6.2]**; and • Cumulative effects: effects generated by the Scheme and other planned or approved developments on the same receptor (presented in **ES Volume 2, Chapters 6 to 16 [APP/6.2]**). **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** describes the existing levels and assesses the anticipated ecology and biodiversity effects of the Scheme's construction, operational, and decommissioning. The chapter provides an assessment of potential effects on internationally, nationally and locally designated sites of ecological or geological importance, on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats. **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse ecology and biodiversity related effects expected across the Scheme's construction, operational and decommissioning phases. There are four direct residual significant (in EIA terms) beneficial effects as a result of the Scheme, which are anticipated in relation to the following ecological features: hedgerows and lines of trees; breeding birds – other species; overwintering birds and amphibians – Great Crested Newt. The expected residual beneficent effects outlined in **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** rely on controls established in the **oCEMP [APP/7.6]**, **oOEMP [APP/7.8]**, **oDS [APP/7.10]** and the **oLEMP [APP/7.11]** and are secured via a requirement of the **draft DCO [APP/3.1]**. As presented in the **Biodiversity Net Gain Assessment Report [APP/7.4],** the ecological mitigation and enhancement areas will deliver a net gain of 23.46% for onsite habitats, and a net gain of 58.78% for onsite hedgerow and tree lines while a requirement of the **draft DCO [APP/3.1]** commits to delivering a minimum net gain of 10% for onsite habitats, and a net gain of 10% for onsite hedgerow and tree lines. Decommissioning is expected to take between 12 and 24 months, and for the purposes of the assessment, is expected to occur after the 60-year design life of the Scheme in 2093. A requirement to decommission the Scheme is secured via a requirement in the **draft DCO [APP/3.1]**. An **oDS [APP/7.10]** has been prepared and submitted with the DCO Application. This sets out the general principles to be followed in the decommissioning phase of the Scheme. The **draft DCO [APP/3.1]** includes a requirement that a detailed Decommissioning Strategy would be prepared substantially in accordance with the oDS and approved by Breckland

		Council at that time of decommissioning, in advance of the commencement of decommissioning works, and would include timescales and transportation methods. As set out in the **ES Chapter 5: The Scheme [APP/6.1],** when the operation and maintenance phase ends, the Solar PV Site would be decommissioned and the land returned to the landowner. All PV Panels, Mounting Structures, above ground cabling (not including the Grid Connection Infrastructure), Conversion Units / 33kV Sub-distribution Switch Rooms, BESS Units and the Customer Substation would be removed from within the Solar PV Site and recycled or disposed of in accordance with good practice and market conditions at that time. Foundations and other below ground infrastructure will be cut to 1.2m below the surface to enable future ploughing. Any piles would be removed. The National Grid Substation and the Grid Connection Infrastructure would remain in situ. Mitigation planting specifically required to support the location of the National Grid Substation, as identified on the **ES Figure 5.2: Construction Masterplan [APP/6.3],** would be handed over to National Grid who would be responsible for its maintenance and management. Post-decommissioning, the landowners would choose how the land is to be used and managed; the landowner may return all of the land to agricultural use, although it is likely that established habitats such as hedgerows and woodland would be retained, given their potential benefits to agricultural land and the wider farming estate. Permissive paths would be removed during decommissioning, with the precise timing to be determined by the contractor(s) and communicated to Norfolk County Council in accordance with the **oDS [APP/7.10].**
Policy EC 04 Employment Development Outside General Employment Areas	Proposals for employment uses outside of the identified General Employment Areas and allocated sites will be permitted where: a. It is demonstrated that there are no other suitable sites available on identified or allocated employment sites; and/or b. There are particular reasons for the development not being located on an established or allocated employment site including: 1. The expansion of an existing business; 2. Businesses that are based on agriculture, forestry or other industry where there are sustainability advantages to being located in close proximity to the market they serve; or 3. Industries and / or businesses which would be detrimental to local amenity if located in settlements, including general employment areas. c. The development of the site would not adversely affect the type and volume of traffic generated. <u>Replacement of Rural Buildings</u> The replacement of rural buildings for B Use Classes as defined in the Use Classes Order may be considered acceptable where the proposal: d. Involves the removal of a building that is substantially intact but is not a traditional building of clear architectural or historic interest;	The Scheme is not for employment use and doesn't replace rural buildings, nevertheless the Scheme has employment effects as set out in **ES Chapter 14: Socio-Economics [APP/6.2].** **ES Chapter 14: Socio-Economics [APP/6.2]** describes the existing levels and assesses the anticipated economic and social effects of the Scheme's construction, operational, and decommissioning. In order to assess the likely effects, **ES Chapter 14: Socio-Economics [APP/6.2]** provides an estimate of the likely employment generation for each phase of the Scheme. During construction, taking the net direct and net indirect jobs together, the Scheme is expected to support 1,145 net additional jobs, with between 285 and 575 of these being taken by LCA residents. During the Operational Phase of the Scheme, there will also be periods of maintenance requiring temporary workers. During this replacement period, an estimated gross 125 FTE jobs per annum would be supported, with the on-site workforce expected to peak at around 360 workers at any one time. The Decommissioning Phase is expected to start in 2093 and is assumed to support a lower number of direct, indirect, induced and local jobs than the Construction Phase. For the purposes of the assessment, it is assumed that a workforce the size of approximately 50%-80% of the construction workforce would be required for the Decommissioning Phase. **ES Chapter 14: Socio-Economics [APP/6.2]** concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse socio-economic related effects expected across the Scheme's construction, operational and decommissioning phases. There is a significant beneficial effect anticipated on the provision of education, skills, training and supply chain as a result of the Scheme's construction, operational and decommissioning phases.

	e. Represents a clear and substantial improvement in terms of size, scale, impact and design from the original; and f. The replacement buildings are well located to the existing buildings, unless it can be demonstrated that an alternative location would be visually less prominent. The Council will consider the need for appropriate measures in order to maintain the visual appearance and architectural character of buildings and prevent the proliferation of buildings in the countryside. Existing Employment (Outside General Employment Areas, employment allocations that have not been superseded and proposed employment allocations). Employment uses in locations outside of those outlined in Policy EC 03 are considered important to the economy, particularly those in rural areas. Proposals that will result in a permanent loss of employment uses with no alternative proposed will be considered on their own merits. The loss will be weighed in the planning balance, taking into account factors such as the long term sustainability of the location, individual site constraints and the existing and potential market demand for employment uses.	The residual effects outlined in the **ES Chapter 14: Socio-Economics [APP/6.2]** rely on controls established within the **oCEMP [APP/7.6], oESSCS [APP/7.15], oOEMP [APP/7.8]** and the **oDS [APP/7.10]** and are secured via requirements in the **draft DCO [APP/3.1].**
Policy EC 06 Farm Diversification	Proposals for farm diversification requiring planning permission will be permitted on existing farm-holdings provided that: a. They would make a positive contribution to the continued viability of the farm holding; b. They would retain or enhance the character of traditional farm buildings; c. Where possible, the proposal re-uses existing buildings of substantial and permanent construction which are structurally sound and capable of conversion without major alterations or the development is well-related to existing buildings if no suitable buildings are available for re-use; d. The agricultural diversification is subservient to the main agricultural use of the farm; e. Wherever possible, they add value to produce emanating from the farm or produced locally, or contribute to the tourism economy; f. The scale and nature of the diversification proposals are appropriate for the location and would not have an unacceptable impact on residential amenity, biodiversity, natural environment, landscape character and the enjoyment of the countryside; g. They do not require new dwellings within the rural area to support the enterprise; h. They do not create extensive areas of hard-standing, and i. The volume and type of traffic that would be generated is appropriate to the accessibility of the site and the standard of the local highway network.	The Scheme would not impact any existing farm buildings or the continued viability of the farm holding. **ES Chapter 14: Socio-Economics [APP/6.2]** describes the existing levels and assesses the anticipated socio-economic effects of the Scheme's construction, operational, and decommissioning. **ES Chapter 14: Socio-Economics [APP/6.2]** concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse socio-economic related effects expected across the Scheme's construction, operational and decommissioning phases. There is a significant beneficial effect anticipated on the provision of education, skills, training and supply chain as a result of the Scheme's construction, operational and decommissioning phases. **ES Chapter 14: Socio-Economics [APP/6.2]** confirms that the Site includes landholdings for agricultural business. The assessment concludes that the Scheme's construction, operational and decommissioning phases will have a minor adverse effect on land use, which is not significant in EIA terms. The surrounding land is predominantly agricultural. As set out in the **Appendix 1: Site Selection Report** to the **Planning Statement [APP/5.5],** the Applicant has developed the design of the Scheme to minimise the land take of BMV land, where practicable. **ES Chapter 11: Soils and Agricultural [APP/6.2]** describes the existing levels and assesses the anticipated soil effects of the Scheme's construction, operational and decommissioning phases, in accordance with this policy. **ES Chapter 6: Landscape and Visual [APP/6.2]** provides an assessment of the Scheme's impact on landscape and visual within the Order limits, or that will be impacted by the Scheme. The chapter is accompanied by **ES Appendix 6.7: Residential Visual Amenity Assessment [APP/6.4],** which considered the effects on residential visual amenity. Residents are identified as a primary visual receptor within the study area likely to be affected by the Scheme. Residential properties included in the study area are shown on **ES Figure 6.9: Residential Properties [APP/6.3].**

		The **Statutory Nuisance Statement [APP/5.3]** draws upon the assessment conclusions from **ES Chapter 16: Other Environmental Matters [APP/6.2]** and **ES Chapter 10: Noise and Vibration [APP/6.2]** to set out that the construction, operational and decommissioning phases of the Scheme would not cause a statutory nuisance, following the implementation of identified mitigation measures. **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** describes the existing levels and assesses the anticipated ecology and biodiversity effects of the Scheme's construction, operational, and decommissioning. The chapter provides an assessment of potential effects on internationally, nationally and locally designated sites of ecological or geological importance, on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats. **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** concludes that with embedded and additional mitigation measures in place, there are no significant adverse (in EIA terms) residual adverse ecology and biodiversity related effects expected across the Scheme's construction, operational and decommissioning phases. There are four direct residual significant (in EIA terms) beneficial effects as a result of the Scheme, which are anticipated in relation to the following ecological features: hedgerows and lines of trees; breeding birds – other species; overwintering birds and amphibians – Great Crested Newt. The expected residual beneficial effects outlined in **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** rely on controls established in the **oCEMP [APP/7.6]**, **oOEMP [APP/7.8]**, **oDS [APP/7.10]** and the **oLEMP [APP/7.11]** and are secured via a Requirement of the **draft DCO [APP/3.1]**. No new dwellings have been proposed as a part of the Scheme. As set out in **ES Chapter 5: The Scheme [APP/6.1],** Work No. 7 comprises of temporary construction and decommissioning compounds / laydown areas within the Solar PV Site and works associated with these comprising areas of, for example, hardstanding. Section 9.4 of **ES Chapter 9: Transport and Access [APP/6.2]** sets out that traffic generated for this Scheme during the construction phase is estimated to be 622 two-way movements per day, which consists of 526 LGVs (such as staff journeys and smaller deliveries) and 96 HGVs. Paragraph 9.4.4 sets out that the distribution of these trips have been discussed and agreed with NH and NCC as the local highway authorities to ensure suitability. Paragraph 9.4.6 of **ES Chapter 9: Transport and Access [APP/6.2]** sets out that during the decommissioning phase, it is expected that the trip generation will be equivalent to or less than those set out for the construction phase. Paragraphs 9.4.9 and 9.4.10 of **ES Chapter 9: Transport and Access [APP/6.2]** the operational and maintenance phase it is expected that the number of trips will be far lower, less frequent, and involve a higher number of smaller vehicles than the construction and decommissioning phases. The access routes necessary for construction, and operation and maintenance are set out in Figure 41 of Section 4.1 of the **oCTMP [APP/7.7].** Paragraphs 4.1.5 to 4.1.7 state that this has been agreed with NCC and NH to ensure there is no travel on unsuitable roads.

Table 6 Norfolk County Council – Table of Compliance

Norfolk Minerals and Waste Local Plan 2023-2038 (2025)		
Policy	**Policy Text**	**Assessment**
Policy MP11: Mineral Safeguarding Areas and Mineral Consultation Areas	The County Council will safeguard existing, permitted and allocated mineral extraction sites from inappropriate development proposals. Mineral Consultation Areas are delineated on the Policies Map and extend to 250 metres from each safeguarded site. Development proposals within 250 metres of a safeguarded site should demonstrate that they would not prevent or prejudice the use of the safeguarded site for mineral extraction and the 'agent of change' principle will be applied in all such cases.	The **Planning Statement [APP/5.5]** confirms that small areas of the Order limits lie within Mineral Safeguarding Areas (sand and gravel) as defined in the adopted Norfolk Minerals and Waste Local Plan (2025). The **ES Appendix 2.2 Scoping Opinion Response [APP/6.4]** confirms that, "*the Mineral Planning Authority does not consider that the proposed development would result in the needless sterilisation of safeguarded mineral resources, and although mineral resource safeguarding is not mentioned as a topic within the Scoping Report, mineral resource safeguarding issues can be scoped out of the assessment*". In accordance with the **Scoping Opinion Response**, the Applicant has not assessed mineral resource safeguarding issues as the impacts will be minimal/non-existent.
Local Transport Plan 4 Strategy 2021-2036 (2022)		
Policy	**Policy Text**	**Assessment**
Policy 1	We will plan and prepare the county for future challenges and changes to ensure the best for our society, environment and economy, and to actively review these developments through time.	**ES Chapter 14: Socio-Economics [APP/6.2]** describes the existing levels and assesses the anticipated economic and social effects of the Scheme's construction, operational, and decommissioning. **ES Chapter 14: Socio-Economics [APP/6.2]** concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse socio-economic related effects expected across the Scheme's construction, operational and decommissioning phases. There is a significant beneficial effect anticipated on the provision of education, skills, training and supply chain as a result of the Scheme's construction, operational and decommissioning phases. The residual effects outlined in the **ES Chapter 14: Socio-Economics [APP/6.2]** rely on controls established within the **oCEMP [APP/7.6], oESSCS [APP/7.15], oOEMP [APP/7.8]** and the **oDS [APP/7.10]** and are secured in the **draft DCO [APP/3.1].** **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** describes the existing levels and assesses the anticipated ecology and biodiversity effects of the Scheme's construction, operational, and decommissioning. The chapter provides an assessment of potential effects on internationally, nationally and locally designated sites of ecological or geological importance, on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats. **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** concludes that with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual adverse ecology and biodiversity related effects expected across the Scheme's construction, operational and decommissioning phases. As a result of embedded and additional mitigation and enhancement measures, there are four direct residual significant (in EIA terms) beneficial effects as a result of the Scheme, which are anticipated in relation to the following ecological features: hedgerows and lines of trees; breeding birds – other species; overwintering birds and amphibians – Great Crested Newt.

		The expected residual beneficial effects outlined in **ES Chapter 7: Ecology and Biodiversity [APP/6.2]** rely on controls established in the **oCEMP [APP/7.6]**, **oOEMP [APP/7.8]**, **oDS [APP/7.10]** and the **oLEMP [APP/7.11]** and are secured via corresponding requirements of the **draft DCO [APP/3.1]**.
Policy 2	The priority for reducing emissions will be to support a shift to more sustainable modes and more efficient vehicles, including lower carbon technology and cleaner fuels; this includes the facilitation of necessary infrastructure.	Mitigation measures to facilitate more sustainable modes of transport are included in Section 6.3 of the **oCTMP [APP/7.7]** which sets out a Travel Plan. The following aims of the Travel Plan are set out to improve access by active, public and shared transport: • The promotion of car sharing to reduce single occupancy car journeys • The provision of a shuttle bus to reduce single occupancy car journeys; and • The increase of knowledge on public transport and Active Travel available to workers. Suggested measures could include: • Establish a car share scheme for workers • Arrange on-site facilities for workers, such as storage lockers for equipment • Provide a map with identified cycling/walking/bus routes to the Scheme; and • Provide emergency cycle repair kit at the compounds. Each of the aims and measures seek to mitigate the effect of air emissions from transport by reducing the number of vehicles used for transporting workers. These measures seek to reduce the need for parking on Site and contribute to the decarbonisation of the transport network by offering a wider modal choice: • Provision of shuttle buses to transport workers to and from nearby conurbations as well as internally within the Scheme • Establish a car share scheme for workers • Consolidation of deliveries through full and reverse logistics strategies where possible; and • Deliveries will be made, when possible, directly to the primary and secondary construction compounds then transferred by a smaller vehicle to consolidate internal vehicle trips across the Scheme. **ES Chapter 9: Transport and Access [APP/6.2]** describes the existing levels and provides an assessment of the anticipated transport and access effects of the Scheme's construction, operational, and decommissioning phases in accordance with this policy. **ES Chapter 9: Transport and Access [APP/6.2]** aims to secure more sustainable patterns of transport through mitigation measures which are included within **the oCEMP [APP/7.6], oCTMP [APP/7.7], oOEMP [APP/7.8], oOTMP [APP/7.9], oDS [APP/7.10],** and **oPRoWPPMP [APP/7.12]** and are secured via the requirements of the **draft DCO [APP/3.1].** **ES Chapter 13: Climate Change [APP/6.2]** concludes that, with embedded and additional mitigation measures in place, a significant residual beneficial effect on global climate across the Scheme's operational phase. The embedded and additional mitigation measures are documented within the **oCEMP [APP/7.6]**, **oOEMP [APP/7.8]**, **and oDS [APP/7.10]** and secured via a requirement of the **draft DCO [APP/3.1]**.

Policy 3	Innovation and new technologies will be embraced and used proactively in order to achieve our vision, including responding to new targets set by the recently adopted environmental policy.	The **Planning Statement [APP/5.5]** outlines how the Scheme achieves the three objectives of sustainable development outlined in Paragraph 8 of the NPPF. The **Planning Statement [APP/5.5]** and the **Statement of Need [APP/5.4]** set out the critical need for large scale ground mounted solar deployment, as established under national planning policy, specifically NPS EN-1 and NPS EN-3. The Scheme would contribute substantially to the need for low carbon energy, in order for the government to meet its objectives and commitments. By generating low carbon energy at a low marginal cost, large-scale solar power reduced the energy generated by more expensive and more carbon intensive forms of generation. The Scheme will help to decarbonise the electricity system and lower the market price of electricity.
Policy 4	We will work with people to shape the way they travel, why they are travelling and whether they need to travel, encouraging behaviour change and interventions that can help to increase the use of sustainable transport.	The Travel Plan within the **oCTMP [APP/7.7]** suggests the following measures to increase the use of sustainable transport by encouraging behaviour change: • A car sharing scheme for workers • On-site facilities for workers, such as storage lockers • A map with identified cycling/walking/bus routes to the Scheme • Provide emergency cycle repair kit at the compounds; and • Provision of a shuttle bus to transport workers to and from nearby conurbations as well as internally within the Scheme. **ES Chapter 9: Transport and Access [APP/6.2]** describes the existing levels and provides an assessment of the anticipated transport and access effects of the Scheme's construction, operational, and decommissioning phases in accordance with this policy. **ES Chapter 9: Transport and Access [APP/6.2]** aims to secure more sustainable patterns of transport through mitigation measures which are included within **the oCEMP [APP/7.6], oCTMP [APP/7.7], oOEMP [APP/7.8], oOTMP [APP/7.9], oDS [APP/7.10],** and **oPRoWPPMP [APP/7.12]** and are secured via the requirements of the **draft DCO [APP/3.1].**
Policy 5	We will work with partners to inform decisions about new development ensuring they are well connected to maximise use of sustainable and active transport options. This will make new developments more attractive places to live, thus supporting a strong sense of the public realm.	The Scheme aims to utilise existing access points onto the Local Road Network to minimise the associated environmental impacts; however, where this is not feasible, a new vehicle access is proposed in **ES Appendix 9.2: Traffic Assessment [APP/6.4]**, which is compliant with all relevant highway safety requirements. The maintenance for these access points will be secured through the **oOTMP [APP/7.9]** throughout the lifetime of the Scheme**.**
Policy 6	We will work with the development community and local stakeholders to ensure greener transport solutions are embedded in land-use planning to significantly reduce traffic generation by private car. We will also work to ensure that the necessary infrastructure to support the transition to a clean transport network is in place. We will seek that that any carbon impacts are monitored and offset by locally applicable measures. As part of our ongoing work on developing guidance for how we will deal with new development we will amongst other things consider how to establish carbon plans and budgets and devise methodologies to achieve carbon neutrality.	Section 6.3 of the **oCTMP [APP/7.7]** sets out that a Travel Plan will be developed, to manage the arrival and departure profile of staff and to encourage sustainable modes of transport, especially a shuttle bus and car-sharing. A Travel Plan Coordinator (TPC) will be appointed to oversee the implementation of the Travel Plan whose responsibilities will comprise, but not necessarily be limited to, implementing measures set out in the Travel Plan, raising awareness and promote the Travel Plan and providing advice to workers regarding sustainable travel options.
Policy 7	In air quality management areas development will need to demonstrate its positive contribution to tackling the air quality problem.	**ES Chapter 3: Order limits and Context [APP/6.1]** confirms that the Site is not located within a Local Authority with designated Air Quality Management Areas (AQMAs) or an AQMA boundary. **ES Chapter 16: Other Environmental Measures [APP/6.2]** discusses potential Air Quality impacts arising as a result of the Scheme. With the measures set out in the **oCEMP [APP/7.6], oCTMP [APP/7.7]** and the **oDS [APP/7.10], ES Chapter 16: Other**

		Environmental Measures [APP/6.2] concludes that the Scheme is not likely to result in significant air quality effects.
Policy 11	When making changes and improvements to our transport network, and in working with users on how they choose to use the transport network, we will seek to understand the consequences of the decisions on meeting the collective challenge of protecting and improving our global environment to meet the environmental policy target of working towards carbon neutrality.	The Travel Plan within the **oCTMP [APP/7.7]** suggests the following measures to increase the use of sustainable transport by encouraging behaviour change: • A car sharing scheme for workers • On-site facilities for workers, such as storage lockers • A map with identified cycling/walking/bus routes to the Scheme • Provide emergency cycle repair kit at the compounds; and • Provision of a shuttle bus to transport workers to and from nearby conurbations as well as internally within the Scheme. **ES Chapter 9: Transport and Access [APP/6.2]** describes the existing levels and provides an assessment of the anticipated transport and access effects of the Scheme's construction, operational, and decommissioning phases in accordance with this policy. **ES Chapter 9: Transport and Access [APP/6.2]** aims to secure more sustainable patterns of transport through mitigation measures which are included within **the oCEMP [APP/7.6], oCTMP [APP/7.7], oOEMP [APP/7.8], oOTMP [APP/7.9], oDS [APP/7.10],** and **oPRoWPPMP [APP/7.12]** and are secured via the requirements of the **draft DCO [APP/3.1].**
Policy 12	Our priority for tackling air quality will be to take action to improve air quality, including investigating vehicular restrictions or charging, where air quality falls below the threshold for Air Quality Management Areas. We will also embrace new ways of monitoring air quality to inform interventions, including in other areas, where this is deemed necessary.	**ES Chapter 3: Order limits and Context [APP/6.1]** confirms that the Site is not located within a Local Authority with designated Air Quality Management Areas (AQMAs) or an AQMA boundary. **ES Chapter 16: Other Environmental Measures [APP/6.2]** discusses potential Air Quality impacts arising as a result of the Scheme. As set out in the **ES Appendix 2.1: Scoping Opinion Request [APP/6.4],** it was proposed to scope out effects on air quality receptors due to the lack of potential for likely significant effects. In Section 3.5 of the **ES Appendix 2.2: Scoping Opinion Response [APP/6.4],** PINS confirmed that air quality effects are not likely to be significant, on the basis that air quality information was to be provided in the ES. With the measures set out in the **oCEMP [AP7.6], ES Chapter 16: Other Environmental Measures [APP/6.2]** concludes that the Scheme is not likely to result in significant air quality effects.
Policy 14	We will work in partnership with agencies in Norfolk to tackle accessibility problems, targeting those communities most in need. We will seek to ensure that accessibility is planned as part of service delivery.	The Applicant has provided an **Access and Rights of Way Plan [APP/2.5]** and an **oPRoWPPMP [APP/7.12]** which set out an overview of the accessible routes and access points available to pedestrians and cyclists. The Applicant has provides an **Equality Impact Assessment [APP/7.2]** which helps to assist the Secretary of State to consider their public sector equality duty (PSED) as set out in section 149 of the Equality Act 2010 (the Act), alongside considering the potential for the Scheme to discriminate based on certain protected characteristics under the Act.
Policy 15	We will identify routes important for sustainable and active transport and give priority – especially in urban areas – to sustainable and active modes of transport.	Within the Travel Plan set out in the **oCTMP [APP/7.7],** the Applicant has committed to the following measures to give priority to sustainable and active transport: • A car sharing scheme for workers

		• On-site facilities for workers, such as storage lockers • A map with identified cycling/walking/bus routes to the Scheme • Provide emergency cycle repair kit at the compounds; and • Provision of a shuttle bus to transport workers to and from nearby conurbations as well as internally within the Scheme. The Applicant has provided an **Access and Rights of Way Plan [APP/2.5]** and an **oPRoWPPMP [APP/7.12]** which set out an overview of the accessible routes and access points available to pedestrians and cyclists.
Policy 17	Using the safe systems approach, the county council and road safety partners will work together to contribute to a reduction in the number of people killed and seriously injured on the road network.	The Applicant has set out the following safety measures within the **oPRoWPPMP [APP/7.12]**: • Provision of banksmen to hold vehicles when PRoW users are present, and to advise PRoW users of potential vehicle movements • Wider access tracks to create more room for PRoW users when vehicles pass them • Reduced speeds limit of 5 – 10mph • Drivers will stop and give-way to any PRoW user that they encounter • Appropriate signage will be installed to make PRoW users aware of construction activity, including times and the contact details for a public liaison officer • The PRoW will be kept clear of construction vehicles and apparatus outside of the permitted construction hours where practicable; and • Any damage to the PRoW will be repaired as soon as practicable. Further mitigation measures for improving safety are outlined in the Travel Plan which is detailed within the **oCTMP [APP/7.7].** These include delivery management, wheel washing, vehicle tracking and identification, and the requirement of accreditation are included where relevant throughout each phase of the Scheme to ensure the safe and effective movement of HGVs and the provision of facilities for the drivers. As set out in Section 5.8 of the **oCTMP [APP/7.7],** all transport and haulage providers of vehicles which are making journeys to the Order limits are committed to best practice, demonstrated by membership to the Freight Operator Recognition Scheme (‘FORS’, or equivalent).
Policy 21	The likely impacts of climate change on the highway network should be addressed to ensure assets are resilient. Where assets can’t be made resilient to impacts of climate change, such as coastal erosion, we should have planned alternatives so we can respond faster and avoid disruption. We will use a risk-based approach to determine the priority for action.	Section 13.8 of **ES Chapter 13: Climate Change [APP/6.2]** sets out that access to the Scheme during the construction phase would be taken from new permeable or existing farm tracks accessed from the local highway network. This limits the potential for increased surface water runoff rates and sedimentation effects during the construction and decommissioning phases. Given that the Scheme is situated approximately 25km from the coast, PINS agrees that significant effects from sea level rise are not likely to occur, and have been scoped out of the assessment, as confirmed in **ES Appendix 2.2: EIA Scoping Opinion Response [APP/6.4]**.

THE DROVES

SOLAR FARM