THE DROVES
SOLAR FARM

The Droves Solar Farm

PAR Mitigation Environmental Technical Note

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1 PAR Mitigation Environmental Technical Note

1.1 Introduction

1.1.1 This Technical Note has been prepared on behalf of The Droves Solar Farm Limited (the Applicant) in relation to an application (the DCO Application) for a Development Consent Order (DCO) to be made to the Secretary of State to construct, operate and maintain, and decommission The Droves Solar Farm (the Scheme), pursuant to the Planning Act 2008.

1.1.2 The purpose of this Technical Note is to present the consideration of the Precision Approach Radar (PAR) Mitigation, as detailed in the **Design Principles, Parameters and Commitments [APP/5.8.5]**, in the context of the environmental topic assessments presented within the Environmental Statement (ES) submitted as part of the DCO Application (and updated throughout Examination) for the Scheme. The topics covered within this Technical Note are those that have determined that, as a result of the introduction of the PAR Mitigation, there would be no change to the assessment of impacts presented in the ES. This position applies to all of the assessed topics within the ES except Landscape and Visual Impacts, which has considered the change to its impact assessment within the relevant affected documents (**ES Chapter 6: Landscape and Visual [APP/6.2.2]**, **ES Appendix 6.7: Residential Visual Amenity Assessment [APP/6.4.1]**, **ES Appendix 6.8: Amenity and Recreation Assessment [APP/6.4.1]**, and **Technical Information Note - Landscape and Visual [APP/8.18.1]**).

1.1.3 In relation to Landscape and Visual Impacts, no new significant effects have been identified; however, the scale of effect of some of the concluded significant effects has increased as a result of the PAR Mitigation. The effects on landscape character at Landscape Character Areas (LCA) D1: Swaffham Heath and E6: North Pickenham Plateau, within the Site only, have increased to Major-Moderate Adverse from Moderate Adverse, during construction, operation, and decommissioning. The visual impacts to Visual Receptor Group (VRG) 1 have increased to Major Adverse during the construction and decommissioning phases, Major Adverse in the short-term operational phase and Major-Moderate Adverse in the medium term operational phase. However, none of the above affects or changes the weighting given in respect of Landscape and Visual impacts in the planning balance in section 9.4 of the **Planning Statement [AS-076]**, as this already accounts for the significant residual landscape and visual impacts set out in **ES Chapter 6: Landscape and Visual [APP/6.2.2]**.

1.1.4 The following topics have been covered within this Technical Note:

- Ecology and Biodiversity
- Cultural Heritage and Archaeology
- Transport and Access
- Noise and Vibration
- Soils and Agriculture

- Water Resources
- Climate Change
- Socio-Economics
- Human Health
- Air Quality
- Arboriculture
- Glint and Glare
- Electromagnetic Fields
- Telecommunications, Utilities and Television Receptors; and
- Waste.

1.2 PAR Mitigation Parameters and Commitments

1.2.1 Technical modelling has been undertaken by the Ministry of Defence (MoD) to identify the areas within the Site that could potentially interfere with the Precision Approach Radar. These areas have been identified, agreed with the Applicant and presented on the **RAF Marham Mitigation Areas Plan [REP4-039]**. The PAR Mitigation would be constructed to avoid potential effects only within the areas marked as Mitigation Area 1, Mitigation Area 2, and Mitigation Area 3 on the **RAF Marham Mitigation Areas Plan [REP4-039]**. The Applicant is committed to implementing a mitigation solution that results in no adverse impact to the operation of the PAR equipment at RAF Marham.

1.2.2 The parameters and commitments for the PAR Mitigation are detailed in the **Design Principles, Parameters and Commitments [APP/5.8.5]** and are summarised as follows:

- The PAR Mitigation will be up to a maximum height of 4.5m, located within Work No.1 (a) only (see also the **Works Plan [REP3-004]**), and have maximum foundations no greater than those proposed for the piled mounting structures (4m below ground level).
- The PAR Mitigation will not be located in parallel on both sides of River Road or Petticoat Road in order to avoid the effect of funnelling.
- The PAR Mitigation will consist of either a fence and/or a bund.
- The PAR Mitigation will be implemented prior to the construction of any part of Work No. 1(a) within the areas shown as Mitigation Area 1, Mitigation Area 2 and Mitigation Area 3 on the **RAF Marham Mitigation Areas Plan [APP/8.26.1]**.
- The PAR Mitigation will not be removed until after all above ground infrastructure has been removed within the areas shown as Mitigation Area 1, Mitigation Area 2 and Mitigation Area 3 on the **RAF Marham Mitigation Areas Plan [APP/8.26.1]**.
- The PAR Mitigation will not impede surface water flow pathways and will have SuDS designed to the 1% AEP + 40% climate change event.

- Traffic movements to facilitate the construction of the PAR Mitigation will be within the cap of daily construction movements secured within the **outline Construction Traffic Management Plan [APP/7.7.4]**.
- If a bund is specified:
  - The slopes of the bund will not exceed 1:3 and will be seeded with grass only.
  - Material will be sourced from within the Site.
- Bunds will be specified instead of a fence in locations where there are no intervening PV Tables located between the position of the PAR Mitigation bund and the visual receptors users of Petticoat Drove, River Road and Keepers Cottage.
- Transitions between a bund and a fence will not occur directly opposite and in direct line of sight from users of Petticoat Drove and River Road. Oblique views of a transition from existing field accesses or gaps in vegetation would be acceptable.
- Fencing will not be located along the crest of bunds.
- If a fence is specified:
  - Clearances above ground or mammal gates will be included within the fence to permit the passage of wildlife.
  - Will consist of non-reflective materials.
  - Will not replace the deer fence around the perimeter of Solar PV Arrays consisting of wire mesh and wooden or metal posts.
  - Will be sited no closer than 4m to the security fencing.
  - Externally finished to be in keeping with the prevailing surrounding environment. The exact colour will be subject to manufacturer specifications and agreed with the relevant planning authority prior to construction but will be carefully selected in subdued, non-reflective tones to sit as discreetly as practicable within the landscape.

1.2.3 There is a potential third option, which is the removal of PV panels in some or all of the affected areas, as shown on the **RAF Marham Mitigation Areas Plan [APP/8.26]** – however, the Applicant does not expect to utilise this option unless absolutely necessary (i.e. only if the PAR Mitigation solution cannot be agreed with the MoD and the relevant planning authority).

1.2.4 The Applicant and the MoD have agreed a form of wording for a requirement in the **draft DCO [APP/3.1.5]** in relation to PAR Mitigation (which secures engagement between the parties at the detailed design stage), which the Applicant has included in its update to the **draft DCO [APP/3.1.5]** at Deadline 5.

1.3 Environmental Impact Consideration

1.3.1 This section of the Technical Note covers each topic that was assessed within the ES submitted as part of the DCO Application for the Scheme, with the exception of Landscape and Visual, as stated in paragraph 1.1.2. Each topic below has considered the PAR Mitigation

in the context of the assessments undertaken in the ES and has provided a summary of why there would be no change to the impacts assessed and the effects concluded in their respective assessments.

Ecology and Biodiversity

1.3.2 **ES Chapter 7: Ecology and Biodiversity [REP3-038]** provides the assessment of Ecology and Biodiversity impacts associated with the construction, operation, and decommissioning phases of the Scheme. The assessment focussed on the impacts of the Scheme on identified habitats and species present within the Site. The implementation of the PAR Mitigation, as detailed in the **Design Principles, Parameters and Commitments [APP/5.8.5]**, would not change any of the impacts assessed or effects concluded within the ES chapter.

1.3.3 The potential issue with the introduction of PAR Mitigation from an Ecology and Biodiversity perspective is the restriction of movement for species within the Site. The ES chapter, as submitted, concluded no significant effects on the species using the Site during any assessed phase of the Scheme.

1.3.4 The commitments made for the PAR Mitigation within the **Design Principles, Parameters and Commitments [APP/5.8.5]** ensure that, where fencing is proposed, clearances above ground are provided at the bottom of the fence and/or mammal gates will be included that permit the passage of wildlife.

1.3.5 In consideration of the basis of assessment in **ES Chapter 7: Ecology and Biodiversity [REP3-038]** and the parameters and commitments of the PAR Mitigation detailed in the **Design Principles, Parameters and Commitments [APP/5.8.5]**, it is considered that the ES has assessed the worst-case impacts associated with the PAR Mitigation from an Ecology and Biodiversity perspective and the effects remain as originally concluded.

Cultural Heritage and Archaeology

1.3.6 **ES Chapter 8: Cultural Heritage and Archaeology [APP-057]** provides the assessment of Cultural Heritage and Archaeology impacts associated with the construction, operation, and decommissioning of the Scheme. The assessment focussed on impacts to existing built heritage assets within the local area and any buried heritage within the Site. The implementation of the PAR Mitigation, as detailed in the **Design Principles, Parameters and Commitments [APP/5.8.5]**, would not change any of the effects concluded within the ES chapter.

1.3.7 The impacts assessed within the ES relate to changes to the setting of built heritage assets, as well as below ground disturbance to archaeological assets. The key parameters for assessment of these impacts related to the maximum height of visible features to affected built heritage assets, and the maximum below ground extent of any works to archaeological remains. Due to the location of the specific (and agreed) PAR Mitigation areas shown on the **RAF Marham Mitigation Areas Plan [APP/8.26.1]**, there is only one heritage asset (Narford Hall Park) that could potentially be affected by the mitigation options due to changes to its

setting. The assessment within the ES, as submitted, concludes no significant effects at Narford Hall Park during any phase of development.

1.3.8 As detailed in the **Design Principles, Parameters and Commitments [APP/5.8.5]**, the PAR Mitigation would not exceed the maximum height of the PV panels (4.5m). The ES has assessed impacts to Narford Hall Park based on a maximum panel height of 4.5m, and there are areas of the Solar PV Site that are located closer to Narford Hall Park than the PAR Mitigation areas. As a result, it is considered that the ES has assessed the worst-case impacts to Narford Hall Park when considering the PAR Mitigation, and no change in impacts or effects is anticipated.

1.3.9 The assessment of impacts to archaeological assets (below ground) in the ES has assessed a maximum pile depth of the PV mounting structures of 4m below ground level. As detailed in the **Design Principles, Parameters and Commitments [APP/5.8.5]**, the maximum depth of fence foundations will be no greater than the piled mounting structures. The creation of bunds would result in localised impacts to archaeological remains, should the topsoil require stripping as part of the bund construction. **ES Chapter 8: Cultural Heritage and Archaeology [APP-057]** has assessed localised impacts to archaeological remains and provided mitigation to ensure these effects aren't significant in **ES Appendix 8.7: outline Archaeological Mitigation Strategy [REP2-016]**. As a result, the effect upon archaeological assets would be no greater than assessed in the ES, with the PAR Mitigation in place.

1.3.10 In consideration of the parameters assessed in **ES Chapter 8: Cultural Heritage and Archaeology [APP-057]** and the parameters and commitments of the PAR Mitigation detailed in the **Design Principles, Parameters and Commitments [APP/5.8.5]**, it is considered that the ES has assessed the worst-case impacts associated with the PAR Mitigation from a Cultural Heritage and Archaeology perspective and the effects remain as originally concluded.

Transport and Access

1.3.11 **ES Chapter 9: Transport and Access [REP1-036]** provides the assessment of Transport and Access impacts associated with the construction and decommissioning of the Scheme. The assessment focussed on impacts to users of the local and strategic road network, assessing effects resulting from increased traffic flow and Heavy Goods Vehicle (HGV) movements. The implementation of the PAR Mitigation, as detailed in the **Design Principles, Parameters and Commitments [APP/5.8.5]**, would not change any of the impacts assessed or effects concluded within the ES chapter.

1.3.12 The key factor for Transport and Access is whether the implementation of fencing and/or bunding would result in an increase in HGV movements during any phase of the Scheme. For the purpose of the ES, it was assumed that the calculated peak of HGV movements would take place across every single day of the construction period; this was a conservative assumption to ensure a worst-case assessment was undertaken, as in reality there will be periods during construction where there are fewer vehicles required. The ES concluded no significant effects, adopting this worst-case assessment approach.

1.3.13 As detailed in paragraph 1.2.2 and secured within the **Design Principles, Parameters and Commitments [APP/5.8.5]**, the HGV movements during the construction phase to facilitate the construction of the PAR Mitigation would not exceed the cap of daily construction movements secured within the **outline Construction Traffic Management Plan (oCTMP) [APP/7.7.4]**. Additionally, as detailed above and secured within the **Design Principles, Parameters and Commitments [APP/5.8.5]**, if bunds are implemented as part of the PAR Mitigation, the material to construct these will be sourced from within the Site; this control eliminates the requirement for HGV movements to import material onto the Site during the construction phase.

1.3.14 In consideration of the parameters assessed in **ES Chapter 9: Transport and Access [REP1-036]** and the parameters and commitments of the PAR Mitigation detailed in the **Design Principles, Parameters and Commitments [APP/5.8.5]**, it is considered that the ES has assessed the worst-case impacts associated with the PAR Mitigation from a Transport and Access perspective and the effects remain as originally concluded.

Noise and Vibration

1.3.15 **ES Chapter 10: Noise and Vibration [REP3-030]** provides the assessment of Noise and Vibration impacts associated with the construction, operation, and decommissioning of the Scheme. The assessment focussed on impacts to noise sensitive receptors, assessing effects from construction works, traffic, operational equipment, and decommissioning works. The implementation of the PAR Mitigation, as detailed in the **Design Principles, Parameters and Commitments [APP/5.8.5]**, would not change any of the impacts assessed or effects concluded within the ES chapter.

1.3.16 The PAR Mitigation areas (as shown in **RAF Marham Mitigation Areas Plan [APP/8.26.1]**) are not located any closer to noise sensitive receptors than the Solar PV Site, as assessed in the ES. The assessment of Noise and Vibration impacts resulting from construction activities has assumed a worst-case scenario that piling would take place at the edge of the Order limits, at the closest point to noise sensitive receptors. There are already sufficient management measures in place to mitigate the effects from the construction works within the **outline Construction Environmental Management Plan (oCEMP) [APP/7.6.5]**, and it is not considered that any additional measures would be required to mitigate effects arising from the construction of the PAR Mitigation.

1.3.17 The Noise and Vibration assessment of construction vehicle movements has been based on the assumptions set out in the Transport and Access assessment. As detailed in paragraph 1.2.2 and secured within the **Design Principles, Parameters and Commitments [APP/5.8.5]**, the HGV movements during the construction phase to facilitate the construction of the PAR Mitigation would not exceed the cap of daily construction movements secured within the **oCTMP [APP/7.7.4]**. As a result, there is no change in noise and vibration effects from construction traffic as a result of the PAR Mitigation.

1.3.18 In consideration of the parameters assessed in **ES Chapter 10: Noise and Vibration [REP3-030]** and the parameters and commitments of the PAR Mitigation detailed in the **Design Principles, Parameters and Commitments [REP4-019]**, and the controls secured

within the **oCTMP [APP/7.7.4]** and **oCEMP [APP/7.6.5]**, it is considered that the ES has assessed the worst-case impacts associated with the PAR Mitigation from a Noise and Vibration perspective and the effects remain as originally concluded.

Soils and Agriculture

1.3.19 **ES Chapter 11: Soils and Agriculture [AS-080]** provides the assessment of Soils and Agriculture impacts associated with the construction, operation, and decommissioning of the Scheme. The assessment focussed on the loss of agricultural land and impacts to soil quality. The implementation of the PAR Mitigation, as detailed in the **Design Principles, Parameters and Commitments [APP/5.8.5]**, would not change any of the impacts assessed or effects concluded within the ES chapter.

1.3.20 The assessment within the ES has assumed that the elements proposed within the Solar PV Site would be temporary, installed for 60-years, and subsequently removed with operation of the land returned to the landowner. There is no permanent loss of agricultural land associated with the Solar PV Site, and this assumption remains the case for the PAR Mitigation. The **outline Soil Management Plan (oSMP) [REP1-062]** and **outline Decommissioning Strategy (oDS) [REP3-067]** contain control measures to reinstate the land to its pre-construction condition and use.

1.3.21 As detailed in the **Design Principles, Parameters and Commitments [APP/5.8.5]**, if bunds are used as part of the PAR Mitigation, the material will be sourced from within the Site and the slopes of the bund will not exceed 1:3 and will be seeded with grass only. Soils will not be mixed, so subsoil will not be stored on topsoil for example, to ensure that the material used in the bund, and the recipient location, can be returned on decommissioning without mixing of different soil types. At the end of the 60-year operational phase, any bunds would be decommissioned, with the land reinstated to its pre-construction condition and use, as per the controls in the **oSMP [REP1-062]** and **oDS [REP3-067]**.

1.3.22 In consideration of the parameters assessed in **ES Chapter 11: Soils and Agriculture [AS-080]** and the parameters and commitments of the PAR Mitigation detailed in the **Design Principles, Parameters and Commitments [APP/5.8.5]**, as well as the controls secured through the **oSMP [REP1-062]** and **oDS [REP3-067]**, it is considered that the ES has assessed the worst-case impacts associated with the PAR Mitigation from a Soils and Agriculture perspective and the effects remain as originally concluded.

Water Resources

1.3.23 **ES Chapter 12: Water Resources [APP/6.2.4]** provides the assessment of Water Resources impacts associated with the construction, operation, and decommissioning of the Scheme. The assessment focussed on changes to surface water flow, increased flood risk, water supply, hydrological changes, and chemical pollution effects. The implementation of the PAR Mitigation, as detailed in the **Design Principles, Parameters and Commitments [APP/5.8.5]**, would not change the magnitude of any of the impacts assessed or the scale of any effects concluded within the ES chapter.

1.3.24 The presence of the PAR Mitigation would introduce additional features with the potential to affect surface water flow and flood risk. However, as detailed in the **Design Principles, Parameters and Commitments [APP/5.8.5]**, the commitment is in place for the PAR Mitigation, whether in the form of fences and/or bunds, to have a Sustainable Drainage Strategy (SuDS) designed to the 1% Annual Exceedance Probability (AEP) + 40% climate change event to ensure surface water flow pathways are accommodated and not rerouted or displaced.

1.3.25 In consideration of the parameters assessed in **ES Chapter 12: Water Resources [APP/6.2.4]** and the parameters and commitments of the PAR Mitigation detailed in the **Design Principles, Parameters and Commitments [APP/5.8.5]**, it is considered that the ES has assessed the worst-case impacts associated with the PAR Mitigation from a Water Resources perspective and the effects remain as originally concluded.

Climate Change

1.3.26 **ES Chapter 13: Climate Change [REP1-040]** provides the assessment of Climate Change impacts associated with the construction, operation, and decommissioning of the Scheme. The assessment focussed on lifecycle greenhouse gas (GHG) emissions, in-combination climate impacts on the environment, and the resilience of the Scheme to climate change impacts. The implementation of the PAR Mitigation, as detailed in the **Design Principles, Parameters and Commitments [APP/5.8.5]**, would not change any of the impacts assessed or effects concluded within the ES chapter.

1.3.27 If bunds are implemented as part of the PAR Mitigation, it has been committed to (in the **Design Principles, Parameters and Commitments [APP/5.8.5]**) that the material to construct the bunds would be sourced from within the Site. Re-using site generated material would eliminate the transport emissions associated with exporting material offsite, which have been assessed as totalling 190.8tCO_2e. The total construction emissions calculated in the ES chapter were 434,503tCO_2e, with the emissions associated with the transportation of soil accounting for approximately 0.04% of these. The construction of the PAR Mitigation in the form of bunds would therefore have no effect on the assessment in **ES Chapter 13: Climate Change [REP1-040]**.

1.3.28 The assessment of fencing material in **ES Chapter 13: Climate Change [REP1-040]** has assumed that the fence material, combined with other ancillaries such as portacabins, security system etc. would contribute to <1% of the total Scheme carbon emissions, in line with the Institute of Sustainability and Environmental Professionals (ISEP) guidance[1]. The specification of the fencing associated with the PAR Mitigation (as detailed in the **Design Principles, Parameters and Commitments [APP/5.8.5]**) is highly unlikely to change the assumption made that the emissions associated with ancillaries would contribute to less than

[1] ISEP (2022a) Environmental Impact Assessment Guide to: Assessing Greenhouse Gas Emissions and Evaluating their Significance 2nd Edition.

1% of the total emissions. The construction of the PAR Mitigation in the form of fencing would therefore have no effect on the assessment in the ES.

1.3.29 In consideration of the parameters assessed in **ES Chapter 13: Climate Change [REP1-040]** and the parameters and commitments of the PAR Mitigation detailed in the **Design Principles, Parameters and Commitments [APP/5.8.5]**, it is considered that the ES has assessed the reasonable worst-case impacts associated from a Climate Change perspective and the effects remain as originally concluded.

Socio-Economics

1.3.30 **ES Chapter 14: Socio-Economics [AS-078]** provides the assessment of Socio-Economics impacts associated with the construction, operation, and decommissioning of the Scheme. The assessment focussed on employment, temporary accommodation, land use, commuting patterns, local tourism assets, and education, skills, training, and supply chain. The implementation of the PAR Mitigation, as detailed in the **Design Principles, Parameters and Commitments [APP/5.8.5]**, would not change any of the impacts assessed or effects concluded within the ES chapter.

1.3.31 If there was a reduction in PV panels as a result of the PAR Mitigation, there could be a small reduction in associated jobs, but not of a level that would have an impact on the concluded effects in **ES Chapter 14: Socio-Economics [AS-078]** on employment, or the provision of education, skills, training, and supply chain. Similarly, there could be an equivalent drop in the demand for temporary worker accommodation, but not to a level that would alter the concluded effects.

1.3.32 The PAR Mitigation would have no impact on the land use change that has been assessed in the ES chapter, with the PAR Mitigation areas (**RAF Marham Mitigation Areas Plan [APP/8.26.1]**) remaining out of agricultural use, regardless of whether the PAR Mitigation is implemented or not. The land use effects would therefore remain as assessed in the ES chapter.

1.3.33 During operation, with the PAR Mitigation in place, the Scheme would continue to support the delivery of an Employment, Skills and Supply Chain Strategy (ESSCS), so there is no change in conclusion of these effects. Changes to local tourism assets are linked to the heritage conclusions above and are therefore unlikely to change from the assessed position.

1.3.34 In consideration of the parameters assessed in **ES Chapter 14: Socio-Economics [AS-078]** and the parameters and commitments of the PAR Mitigation detailed in the **Design Principles, Parameters and Commitments [APP/5.8.5]**, it is considered that the ES has assessed the worst-case impacts associated with the PAR Mitigation from a Climate Change perspective and the effects remain as originally concluded.

Human Health

1.3.35 **ES Chapter 15: Human Health [REP3-032]** provides the assessment of Health impacts associated with the construction, operation, and decommissioning of the Scheme. The

assessment focussed on employment, physical activity, and education, skills, training, and supply chain. The implementation of the PAR Mitigation, as detailed in the **Design Principles, Parameters and Commitments [APP/5.8.5]**, would not change any of the impacts assessed or effects concluded within the ES chapter.

1.3.36 Of the assessed impacts in the ES chapter, only physical activity would have the potential to be affected by the PAR Mitigation if it created a sense of enclosure along sections of Public Rights of Way (PRoW), appeared visually intrusive if not well integrated into the landscape, and reduced the perceived attractiveness of routes, resulting in some of the users choosing not to use the PRoW. However, as detailed in the **Design Principles, Parameters and Commitments [APP/5.8.5]**, the PAR Mitigation would be subject to the same buffers and offsets as apply to Work No. 1(a), which includes a minimum 15m offset to PRoW. With this commitment in place, it is considered that the PAR Mitigation would not reduce the perceived attractiveness of PRoW beyond that already assessed in the ES.

1.3.37 In consideration of the parameters assessed in **ES Chapter 15: Human Health [REP3-032]** and the parameters and commitments of the PAR Mitigation detailed in the **Design Principles, Parameters and Commitments [APP/5.8.5]**, it is considered that the ES has assessed the worst-case impacts associated with the PAR Mitigation from a Climate Change perspective and the effects remain as originally concluded.

Other Environmental Matters

1.3.38 **ES Chapter 16: Other Environmental Matters [REP3-034]** provides the combined assessment of impacts on Other Environmental Matters associated with the construction, operation, and decommissioning of the Scheme. The chapter covers the assessments of Air Quality, Arboriculture, Waste, Glint and Glare, Electromagnetic Fields, and Telecommunications, Utilities and Television Receptors. The implementation of the PAR Mitigation, as detailed in the **Design Principles, Parameters and Commitments [APP/5.8.5]**, would not change any of the impacts assessed or effects concluded within the ES chapter.

Air Quality

1.3.39 The assessment of Air Quality impacts associated with the PAR Mitigation is limited to the impact from additional construction vehicle traffic. As detailed in paragraph 1.2.2 and secured within the **Design Principles, Parameters and Commitments [APP/5.8.5]**, the HGV movements during the construction phase to facilitate the construction of the PAR Mitigation would not exceed the cap of daily construction movements secured within the **oCTMP [APP/7.7.4]**. It is therefore considered that there would be no change to the effects concluded in respect of air quality.

Arboriculture

1.3.40 The PAR Mitigation is subject to the same buffers and offsets as apply to Work No. 1(a), as detailed in the **Design Principles, Parameters and Commitments [APP/5.8.5]**; this

includes the buffers to trees and hedgerows. There would, therefore, be no change to the impacts to arboriculture as a result of the PAR Mitigation.

Glint and Glare

1.3.41 The effects concluded from the assessment of Glint and Glare impacts are solely associated with the presence of PV panels within the Solar PV Site. The implementation of the PAR Mitigation would, therefore, result in no worsening of the effects concluded as a result of Glint and Glare impacts in the ES.

Electromagnetic Fields

1.3.42 Effects associated with Electromagnetic Fields arise from the generation, transmission, distribution and use of electricity, specifically associated with electrical infrastructure. The PAR Mitigation proposes no new electrical infrastructure; therefore, the effects concluded in the ES are not affected by the PAR Mitigation.

Telecommunications, Utilities and Television Receptors

1.3.43 The assessment of impacts on Telecommunications, Utilities, and Television Receptors in the ES was focused solely on impacts to below ground utilities being affected by groundbreaking activities. The PAR Mitigation is contained within Work No. 1(a), where the only below-ground activities (in respect of those areas of Work No. 1(a)) are associated with the piling for the Mounting Structures. As detailed in the **Design Principles, Parameters and Commitments [APP/5.8.5]**, the maximum depth of fence foundations associated with the PAR Mitigation would be no greater than the piling depth of the Mounting Structures. It is therefore considered that there would be no change to the effects concluded in the ES.

Waste

1.3.44 The main source of waste for all phases of the Scheme is the PV panels and associated packaging. Other primary waste sources include the decommissioning of electrical infrastructure and cabling. The waste arising from the fencing associated with the Scheme is minimal and is not expected to materially affect the total Scheme waste generation as a result of the fencing as part of the PAR Mitigation. If bunding is used, as stated in the **Design Principles, Parameters and Commitments [APP/5.8.5]**, these would be constructed using material from within the Site. The total waste generation from the construction and decommissioning of the Scheme, assuming a worst-case that all goes to landfill, takes up 0.24% of baseline capacity; it is not expected that the PAR Mitigation would have any impact on this. There is no operational waste associated with the PAR Mitigation. Therefore, it is considered that there would be no change to the effects concluded in the ES.

1.3.45 Overall, in respect of the Other Environmental Matters, in consideration of the parameters assessed in **ES Chapter 16: Other Environmental Matters [REP3-034]** and the parameters and commitments of the PAR Mitigation detailed in the **Design Principles, Parameters and Commitments [APP/5.8.5]**, it is considered that the ES has considered the worst-case impacts associated with the PAR Mitigation for the topics covered under Other Environmental Matters and the effects remain as originally concluded.

1.4 Conclusion

1.4.1 This Technical Note has presented the consideration of the PAR Mitigation against each of the technical topics assessed within the ES. It has been demonstrated that, with the parameters and commitments in place that are secured through the **Design Principles, Parameters and Commitments [APP/5.8.5]**, there is no change to the assessment conclusions as a result of the PAR Mitigation proposed as part of the Scheme. This applies to all topics covered in this Technical Note, which excludes Landscape and Visual Impacts, which have been considered within the relevant affected documents (**ES Chapter 6: Landscape and Visual [APP/6.2.2]**, **ES Appendix 6.7: Residential Visual Amenity Assessment [APP/6.4.1]**, **ES Appendix 6.8: Amenity and Recreation Assessment [APP/6.4.1]**, and **Technical Information Note - Landscape and Visual [APP/8.18.1]**). No new significant landscape and visual effects have been identified; however, the scale of effect of some of the concluded significant effects has increased as a result of the PAR Mitigation. However, this does not affect or change the weighting given in respect of Landscape and Visual impacts in the planning balance in section 9.4 of the **Planning Statement [AS-076]**, as this already accounts for the significant residual landscape and visual impacts set out in **ES Chapter 6: Landscape and Visual [APP/6.2.2]**.

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