



East Pye Solar Policy Compliance Document

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<u>Reference</u>	<u>Page</u>	<u>Description of Changes</u>	<u>Reason for Revision</u>
<u>Policy Compliance Document (Rev 2)</u>		<u>Updates made throughout the document to account for the publication of the replacement National Planning Policy Framework (NPPF), August 2026.</u>	<u>As requested by the Examining Authority in first written questions.</u>

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Table 1: Overarching National Policy Statement for Energy (EN-1) December 2025

Relevant Paragraph	Detail	Scheme Compliance
The Need for New Nationally Significant Energy Infrastructure Projects		
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, as set out in the Statement of Need [EN0110014/APP/7.11] and Planning Statement [EN0110014/APP/7.14] .
3.1.2	However, it will not be possible to develop the necessary amounts of such infrastructure without some significant residual adverse impacts. These effects will be minimised by the application of policy set out in Parts 4 and 5 of this NPS. See also Part 2 of each technology specific NPS.	Given the Scheme comprises EIA development as defined by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, an EIA has been undertaken to assess the environmental impacts of the Scheme, with the findings presented in the Environmental Statement (ES) [EN0110014/APP/6.1-6.4]. The mitigation hierarchy has been appropriately applied to avoid, reduce and mitigate, wherever practicable. As summarised in the Planning Statement [EN0110014/APP/7.14], some significant adverse residual effects have been identified. It concludes that adverse effects have been appropriately managed and that the residual significant adverse effects are outweighed by the residual significant benefits. The Planning Statement [EN0110014/APP/7.14] considers the compliance of the Scheme with policy taking into account the findings of the ES [EN0110014/APP/6.1-6.4]. It is considered that these residual effects 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). As reported in the Planning Statement [EN0110014/APP/7.14], the Scheme does not have an unacceptable interference with human health and public safety, defence, irreplaceable habitats or onshore to flood and coastal erosion risk.
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 Statement of Need [EN0110014/APP/7.11] confirms large-scale solar is a proven technology, capable of delivery at scale against the timeframes required to deliver net zero. The Scheme will, if consented, bring forward large-scale ground-mount solar with co-located energy storage facilities and will make a critical contribution towards net zero and timely contribution to meeting the Government's targets of Clean Power by 2030. The Applicant's proposed grid connection solution is appropriate and critically, is available for the Scheme to commission in a timeframe which will enable it to contribute to the UK achieving its sixth Carbon Budget. The Scheme will, if consented, contribute to the achievement of Government objectives to deliver sustainable development that enables decarbonisation.

Relevant Paragraph	Detail	Scheme Compliance
		ES Volume 1, Chapter 6 - Climate Change [EN0110014/APP/6.1.6] the overall GHG impact of the Scheme is beneficial and significant. Therefore, if consented, the Scheme would make a significant and timely contribution to meeting the Government's targets of Clean Power by 2030 and net zero by 2050 and represents a benefit to the UK and its decarbonisation targets.
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 Statement of Need [EN0110014/APP/7.11] explains how 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 2031. 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.	
3.2.4	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 inform developments of new energy infrastructure projects.	

Relevant Paragraph	Detail	Scheme Compliance
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.	In accordance with this policy, the Applicant notes that the Government has demonstrated there is an urgent need for infrastructure such as the Scheme.
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.	The Statement of Need [EN0110014/APP/7.11] explains the urgent need for the Scheme and concludes 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 2031. The Applicant notes that, in accordance with this policy, the urgent need for infrastructure such as the Scheme should be given substantial weight by the Secretary of State. The planning balance of the Scheme is set out in the Planning Statement [EN0110014/APP/7.14]. The Planning Statement concludes that given the urgent need for large-scale solar development and the substantial benefits of the Scheme, there is a clear and compelling case for the DCO to be made.
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.	
3.2.11	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.	
3.3.12	Decentralised and community energy systems, including but not limited to micro-generation contribute to our targets on reducing carbon emissions and increasing energy security. These technologies could also lead to some reduction in demand on the main generation and transmission system. However, the government does not believe they will replace the need for new large-scale electricity infrastructure to meet our energy objectives. This is because connection of large-scale electricity generating facilities via a high voltage transmission system enables the pooling of both generation and demand, which in turn offers a number of economic and other benefits, such as more efficient bulk transfer of power and enabling surplus generation capacity in one area to be used to cover shortfalls elsewhere.	The Statement of Need [EN0110014/APP/7.11] explains the urgent need for the Scheme and concludes 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 2031. Large-scale solar power decarbonises the electricity system and lowers the market price of electricity by generating power so that expensive and more carbon intensive forms of generation do not need to generate as much. In doing so, solar power delivers national decarbonisation benefits and supports consumer affordability aims, to the benefit of electricity consumers. Scale remains important. Maximising the generating capacity of schemes improves their economic efficiency and so brings electricity generation to the market at a lower cost.
3.3.13	The Clean Power Action Plan and the Net Zero Strategy sets out the government's ambition for increasing the deployment of low carbon energy infrastructure consistent with delivering our carbon budgets and the 2050 net zero target. This made	

Relevant Paragraph	Detail	Scheme Compliance
	clear the commitment that the cost of the transition to net zero should be fair and affordable.	
3.3.16	If demand for electricity doubles by 2050, we will need a fourfold increase in low carbon generation and significant expansion of the networks that transport power to where it is needed. In addition, we committed in the Clean Power 2030 Action Plan to clean sources producing at least 95% Great Britain's generation. This will set us well on the way to the commitment in the Net Zero Strategy to take action, whilst meeting a 40-60 per cent increase in electricity demand. This means that the majority of new generating capacity needs to be low carbon.	
3.3.21	Given the changing nature of the energy landscape, we need a diverse mix of electricity infrastructure to come forward, so that we can deliver a secure, reliable, affordable, and net zero consistent system during the transition to 2030 and 2050 for a wide range of demand, decarbonisation, and technology scenarios.	As set out in the Statement of Need [EN0110014/APP/7.11] , as part of a diverse generation mix, solar generation improves the stability of capacity utilisations which in turn improves generation dependability. When developed alongside other renewable technologies, large-scale solar will help smooth out seasonal variations in total renewable electricity generation, more closely matching anticipated demand.
3.3.23	Wind and solar are the lowest cost ways of generating electricity, helping reduce costs and providing a clean and secure source of electricity supply (as they are not reliant on fuel for generation). Our analysis shows that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar.	The Statement of Need [EN0110014/APP/7.11] provides evidence that, based on current economics, solar generation is likely to be one of the lowest cost sources of electricity in both the 2020s and 2050 energy mix. A diverse mix of low carbon generation will be required to meet national decarbonisation targets. The Scheme will be an important part of the future generation mix connecting in East Anglia. The Statement of Need [EN0110014/APP/7.11] also states that due to technological advances, solar facilities are already among the cheapest form of electricity generation in the UK and Government produced forecasts indicate that costs will continue to reduce in the future.
3.3.25	Storage has a key role to play in meeting the Clean Power 2030 Mission, achieving net zero, and providing flexibility to the energy system, reducing the amount of generation and associated network that needs to be built to meet peak demand, helping Britain reach clean power in a cost-effective way and reducing delivery risk associated with other types of energy infrastructure.	The Scheme seeks to bring forward co-located storage facilities as associated development to the main (renewable generation) development. The Statement of Need [EN0110014/APP/7.11] acknowledges that flexible assets such as BESS will help to meet periods when the gap between demand and renewable generation is highest. BESS is well suited to increasing the effectiveness of solar schemes in different

Relevant Paragraph	Detail	Scheme Compliance
3.3.26	Storage is needed to reduce the costs of the electricity system and increase reliability by storing surplus electricity in times of low demand to provide electricity when demand is higher.	weather scenarios. The potential contributions made by a storage asset as part of the Scheme to the electricity market is described in the Statement of Need [EN0110014/APP/7.11] .
3.3.27	Storage can provide various services, locally and at the national level. These include maximising the usable output from intermittent low carbon generation (e.g. solar and wind), reducing the total amount of generation capacity needed on the system; providing a range of balancing services to the NESO and Distribution Network Operators (DNOs) to help operate the system; and reducing constraints on the networks, helping to defer or avoid the need for costly network upgrades as demand increases.	
3.3.57	Government has committed to reduce GHG emissions by 78 per cent by 2035 under Carbon Budget 6. The 2030 Clean Power Action Plan requires that 95% of Great Britain's generation will come from clean sources by 2030.	As set out in the Statement of Need [EN0110014/APP/7.11], the Applicant's proposed grid connection solution is appropriate and critically, is available for the Scheme to commission in a timeframe which will enable it to contribute to the UK achieving its sixth Carbon Budget. The Scheme is required to ensure that the UK remains on track to support Government's clean power ambitions on the way to meeting its legally binding carbon emissions reduction targets, including the Sixth Carbon Budget and beyond. ES Volume 1, Chapter 6 - Climate Change [EN0110014/APP/6.1.6] sets out the carbon budgets and assesses GHG emissions likely to be produced through the construction, operation and decommissioning phases of the Scheme. Over the lifespan, the Scheme will result in an estimated net saving of 1,294,630 tCO₂e in comparison with a scenario whereby the Scheme does not come into effect and emissions from the grid in the baseline year of operation (0.065kgCO₂e/kwh) were used. It is considered that the overall GHG impact of the Scheme is beneficial and significant, as the Scheme achieves emissions mitigation that goes substantially beyond the reduction trajectory, or substantially beyond existing and emerging policy compatible with that trajectory. The Scheme is playing a part in achieving the rate of transition required by nationally set policy commitments.
3.3.58	Given the urgent need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation, there is an urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy.	As discussed in the above responses, the Scheme is urgently needed to meet the Government's energy objectives for the reasons set out in the Statement of Need [EN0110014/APP/7.11]. Larger solar schemes deliver more quickly and at a lower unit cost than multiple independent schemes which make up the same total capacity, bringing forward carbon reduction and energy security benefits. The Statement of Need [EN0110014/APP/7.11] provides evidence for the need of the Scheme. The need for the Scheme is urgent, and substantial weight should
3.3.59	All the generating technologies mentioned above are urgently needed to meet the government's energy objectives by:	

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	- 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)	be given to that need. The proposed location is an appropriate location for large-scale solar because of the existence of grid infrastructure with the capacity available to transmit the low carbon energy generated by the Scheme to local and national customers, coupled with sufficient solar irradiance, and a suitable area of secured land for the solar and BESS. Further, a large-scale solar connecting into the existing overhead line between Norwich Main and Bramford substations provides the potential to help decarbonise electricity demand to the benefit of consumers both locally and nationally. The Statement of Need [EN0110014/APP/7.11] and Planning Statement [EN0110014/APP/7.14] describes the benefits of the Scheme with regard to decarbonisation, security of supply and affordability. These benefits delivered by the Scheme should be afforded substantial weight in the planning balance. The Planning Statement [EN0110014/APP/7.14] also 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. For reasons set out in the Planning Statement [EN0110014/APP/7.14], the Scheme meets the definition of CNP Infrastructure. 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.
3.3.62	Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. Section 4.2 states which energy generating technologies are low carbon and are therefore CNP infrastructure.	
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, means that it is likely the need case will outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy, in all but the most exceptional circumstances. Government strongly supports the delivery of CNP infrastructure and it should be progressed as quickly as possible.	
3.3.65	There is an urgent need for new electricity network infrastructure to be brought forward at pace to meet our energy objectives.	
3.3.66	The security and reliability of the UK's current and future energy supply is highly dependent on having an electricity network which will enable new renewable electricity generation, storage, and interconnection infrastructure that our country needs to meet the rapid increase in electricity demand required to transition to net zero while maintaining energy security. The delivery of this important infrastructure also needs to balance cost to consumers, accelerated timelines for	

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	delivery and the minimisation of community and environmental impacts.	
3.3.84	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.	
3.3.85	Given the urgent need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation, there is an urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy.	
Assessment Principles		
4.1.5	In considering any proposed development, in particular when weighing its adverse impacts against its benefits, the Secretary of State should take into account: • Its potential benefits including its contribution to meeting the need for the Clean Power 2030 Mission and net zero, energy infrastructure, job creation, reduction of geographical disparities, environmental enhancements, and any long-term or wider benefits • Its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy	An EIA has been undertaken to assess the environmental impacts of the Scheme, with the findings presented in the Environmental Statement (ES) [EN0110014/APP/6.1-6.4]. A summary of the likely significant residual effects of the Scheme, taking into consideration embedded and additional mitigation, is provided in ES Volume 1, Chapter 20 – Summary of Residual Significant Effects [EN0110014/APP/6.1.20]. In addition, the Statement of Need [EN0110014/APP/7.11] and, as summarised in the Planning Statement [EN0110014/APP/7.14], describes the benefits of the Scheme with regard to decarbonisation, security of supply and affordability. The Planning Statement [EN0110014/APP/7.14] provides the planning balance for the Scheme, considering the likely significant beneficial effects of the Scheme and the likely significant residual adverse effects. In summary, the Scheme would provide the following benefits:
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).	• Green Energy and Climate Change: a significant and timely contribution to meeting the Government’s targets of Clean Power by 2030 and net zero by 2050. Helping to address the increase in demand for electricity and deliver large amounts of low cost, secure, and low carbon electricity in support of Government’s energy policy aims;

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4.1.7	Where this NPS or the relevant technology specific NPSs require an applicant to mitigate a particular impact as far as possible, but the Secretary of State considers that there would still be residual adverse effects after the implementation of such mitigation measures, the Secretary of State should weigh those residual effects against the benefits of the proposed development. For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects not capable of being addressed by application of the mitigation hierarchy, in all but the most exceptional cases. This presumption, however, does not apply to residual impacts which present an unacceptable risk to, or interference with, human health and public safety, defence, or irreplaceable habitats. Further, the same exception applies to this presumption for residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk. See paragraph 4.2.28 of this NPS for further detail.	• Landscape, Green Infrastructure and Habitat Creation: strengthen habitat connectivity at a landscape scale and positively contribute to local green infrastructure. • Publicly Accessible Space: provide publicly accessible space including approximately 850m of newly created permissive paths that would strengthen the network of greenways and active connections. In addition, up to 19.8ha of new community accessible spaces for pedestrian use would be created. • Biodiversity: deliver, as a minimum, 10% BNG. • Jobs and Economy: it has been estimated that a total of 1,044 net additional jobs would be provided during the construction phase. Employment opportunities are also anticipated during the operational and decommissioning phases of the Scheme. The Scheme is estimated to generate £137m in GVA over the construction phase. Skills: features a range of measures which will support education, apprenticeships, training and engage in local partnerships. ES Volume 1, Chapter 6 - Climate Change [EN0110014/APP/6.1.6] sets out the likely GHG emissions arising from the Scheme. It concludes that over the lifespan, the Scheme will result in an estimated net saving of 1,294,630 tCO₂e in comparison with a scenario whereby the Scheme does not come into effect and emissions from the grid in the baseline year of operation (0.065kgCO₂e/kwh) were used. The overall GHG impact of the Scheme is beneficial and significant. Therefore, if consented, the Scheme would make a significant and timely contribution to meeting the Government's targets of Clean Power by 2030 and net zero by 2050 and represents a benefit to the UK and its decarbonisation targets. As set in the Grid Connection Statement [EN0110014/APP/7.12], the Scheme has a Grid Connection Agreement that allows the Applicant to export 500MW from the electricity produced at the Scheme through the new National Grid Substation. As outlined in ES Volume 1, Chapter 6 - Climate Change [EN0110014/APP/6.1.6], estimated renewable energy generation from the Scheme, after accounting for product degradation, is expected to be 600,214 MWh in the final year of operation. The total energy generated by the Scheme would be around 36.33 TWh over the operation phase. This represents a significant contribution towards the delivery of the Government's energy objectives and the target of Clean Power 2030 and net zero by 2050. The Statement of Need [EN0110014/APP/7.11] provides that large-scale solar lowers the price of electricity by generating power so that expensive and more carbon intensive forms of generation do not need to generate as much. Growing capacity of renewable energy sources, including large-scale solar, supports consumers by reducing the energy system's exposure to gas price fluctuations arising from volatile global fossil fuel markets. Due to technological

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		advances, solar is already among the cheapest forms of electricity generation in the UK and Government-produced forecasts indicate that costs will continue to reduce in the future. The Scheme will deliver large amounts of low cost, secure, and low carbon electricity in support of Government's energy policy aims to ensure that the national energy system always remains secure, reliable, affordable, and low carbon. Embedded measures are secured through various management plans: • Outline Construction Environmental Management Plan (Outline CEMP) [EN0110014/APP/7.1]; • Outline Construction Traffic Management Plan (Outline CTMP) [EN0110014/APP/7.6]; • Outline Operational Environmental Management Plan (Outline OEMP) [EN0110014/APP/7.2]; • Outline Operational Traffic Management Plan (Outline OTMP) [EN0110014/APP/7.7]; • Outline Decommissioning Environmental Plan (Outline DEMP) [EN0110014/APP/7.3]; • Outline Landscape and Ecology Management Plan (Outline LEMP) [EN0110014/APP/7.4]; • Outline Public Right of Way and Permissive Path Management Plan (Outline PRoWPPMP) [EN0110014/APP/7.8]; • Outline Soil and Resource Management Plan (Outline SRMP) [EN0110014/APP/7.9]; • Outline Battery Safety Management Plan (Outline BSMP) [EN0110014/APP/7.5]; and • Outline Employment, Skills and Supply Chain Strategy (Outline ESSCS) [EN0110014/APP/7.10]. In the case of the Scheme, the residual significant adverse effects are limited to landscape and visual effects and BMV quality agricultural land. It is considered that these residual effects 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. As reported in the Planning Statement [EN0110014/APP/7.14], the Scheme does not have an unacceptable interference with human health and public safety, defence, irreplaceable habitats or onshore to flood and coastal erosion risk. The Planning Statement [EN0110014/APP/7.14] considers the CNP presumption, in accordance with this policy, and confirms that the CNP presumption will apply in relation to the Scheme. The Applicant has demonstrated that the Scheme is in accordance with the NPS, 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

Relevant Paragraph	Detail	Scheme Compliance
		presumption applies to the Scheme and accordingly should be taken into account in the decision-making process. It concludes that, following application of the planning balance and CNP presumption, there is an overwhelming case in favour of granting development consent for the Scheme.
4.1.10	The policy set out in this NPS and the technology specific energy NPSs is intended to provide greater clarity around existing policy and practice of the Secretary of State in considering applications for nationally significant energy infrastructure, (or therefore the “benchmark” for what is, or is not, an acceptable nationally significant energy development).	The Scheme’s compliance with the NPS is considered in this Policy Compliance Document [EN0110014/APP/7.15] and within the Planning Statement [EN0110014/APP/7.14] .
4.1.11	The energy NPSs have taken account of the National Planning Policy Framework (NPPF), the Planning Practice Guidance for England, and Planning Policy Wales and Technical Advice Notes (TANs) for Wales, where appropriate.	The Scheme’s compliance with the NPPF is considered within this Policy Compliance Document [EN0110014/APP/7.15] and within the Planning Statement [EN0110014/APP/7.14] .
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 planning policies is considered within this Policy Compliance Document [EN0110014/APP/7.15] and within the Planning Statement [EN0110014/APP/7.14] .
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.	
4.1.16	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.
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 [EN0110014/APP/3.2] to the draft DCO [EN0110014/APP/3.1] explains the purpose and effect of each provision in the draft DCO [EN0110014/APP/3.1] , including why it is considered necessary, as required by Regulation

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		5(2)(c) of the APFP Regulations. It also identifies examples of precedents from other DCOs where applicable.
4.1.18	The Secretary of State should consider the guidance in the NPPF, the Planning Practice Guidance: Use of Planning Conditions, and TANs, or any successor documents, where appropriate.	The Scheme's compliance with the adopted and emerging NPPF is considered within this Policy Compliance Document [EN0110014/APP/7.15] . The Scheme has been developed with consideration of relevant Planning Practice Guidance.
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 [EN0110014/APP/3.2] to the draft DCO [EN0110014/APP/3.1] explains the purpose and effect of each provision in the draft DCO [EN0110014/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.
4.1.20	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.	The Consultation Report [EN0110014/APP/5.1] and its supporting appendices 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 [EN0110014/APP/5.1] also aligns with the guidance outlined in Nationally Significant Infrastructure Projects: Advice on the Consultation Report, March 2025, and Nationally Significant Infrastructure Projects: 2024 Pre-Application Prospectus, May 2025, where relevant. The Consultation Report [EN0110014/APP/5.1] details the early engagement held by the Applicant. Shadow Habitats Regulations Assessment [EN0110014/APP/7.25] has been submitted with the DCO Application. This found no mechanism for impacts arising at the identified European Sites via potential pathways. As such, no likely significant effects have been identified on the integrity of relevant protected sites, either alone or in-combination with any other plan or project. The Shadow Habitats Regulations Assessment does not proceed to Appropriate Assessment stage.
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.	
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 [EN0110014/APP/4.2] and the Grid Connection Statement [EN0110014/APP/7.12] are submitted alongside the DCO Application, setting out how the Scheme is to be funded, and that the status of the grid connection.
4.1.23	Where the Secretary of State considers that the financial viability and technical feasibility of the proposal has been properly assessed by the applicant, it is unlikely to be of	The Funding Statement [EN0110014/APP/4.2] confirms that, through its parent company IGP, the Applicant has the ability to procure the financial resources necessary to fund the works authorised by the DCO. In the event that development consent is granted, IGP would seek further funding in line with standard market practice for privately funded infrastructure

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	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).	projects, consulting with experienced financial institutions and advisors. While the final form of finance has not yet been determined, the Applicant is confident, having taken professional legal, financial and technical advice, that the Scheme is commercially viable and capable of being funded. The Applicant has therefore made an assessment of the financial viability and technical feasibility of the Scheme and is satisfied that it can be delivered. In accordance with the relevant NPS policy, financial viability and technical feasibility are not matters which require detailed scrutiny by the Secretary of State unless specific concerns arise. The Applicant has followed a design process that has taken into account environmental, physical, technical, social, and commercial considerations and opportunities, as well as engineering requirements. Therefore, the Applicant is confident that they have developed a viable Scheme 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 and NPS EN-3.
The Critical National Priority for Low Carbon Infrastructure		
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.	As described in the responses above, 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.
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.	The Statement of Need [EN0110014/APP/7.11] sets the need, current and future energy demands together with concluding that the Scheme will deliver a significant amount of low-carbon, low-cost and UK located solar electricity generation capacity connecting to National Electricity Transmission System, anticipated to be from 2031. The Scheme is a substantial infrastructure asset, capable of delivering large amounts of secure, affordable low carbon electricity to local and national networks. 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. A summary of these wider benefits of the Scheme is given in the Planning Statement [EN0110014/APP/7.14] .
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.	Embedded measures to avoid and reduce environmental impacts as far as practicable are secured through various management plans that have been submitted with the DCO Application.

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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 [EN0110014/APP/7.11] provides details 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 Consultation Report [EN0110014/APP/5.1] and associated appendices set out engagement that has been undertaken throughout the pre-application stage. This has included engagement with consultees including Norfolk County Council (NCC), South Norfolk Council (SNC) and locally elected members and representatives, local communities, technical officers at NCC and SNC and relevant statutory undertakers. Engagement will continue throughout the examination process.
4.2.5	Government is proposing amendments to infrastructure planning, including to the Planning Act 2008 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 pre-application 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. As detailed in the Consultation Report [EN0110014/APP/5.1] and associated appendices, the Applicant has undertaken non-statutory consultation, statutory consultation and targeted consultation. The Applicant has had regard to the feedback received, as set out in Appendix 11 [EN0110014/APP/5.12] and Appendix 12 [EN0110014/APP/5.13] of the Consultation Report [EN0110014/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.	Details of the consents and licenses included in the draft DCO [EN0110014/APP/3.1] are explained in the Explanatory Memorandum [EN0110014/APP/3.2] and the Consents and Agreement Position Statement [EN0110014/APP/7.22]. The latter also includes a list of the likely consents to be sought outside of the DCO process. The Applicant and the consenting bodies for the additional consents and licences listed in the Consents and Agreements Position Statement [EN0110014/APP/7.22] will be part of

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		ongoing discussions. 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 identified the following consenting bodies as set out in the Consents and Agreements Position Statement [EN0110014/APP/7.22]: • Office of Gas and Electricity Market (Ofgem); • National Grid Electricity System Operator Limited (NGESO); • Environment Agency; • Highways Agency, Local Highway Authority or the police and bridge owners (if any) as appropriate. • SNC; • NCC; • Natural England; • Anglian Water; and • Health and Safety Executive (HSE).
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 detailed in the Consultation Report [EN0110014/APP/5.1] and associated appendices, the Applicant has undertaken statutory consultation. This was accompanied by a Preliminary Environmental Information Report (PEIR) of the emerging Scheme and the likely significant effects identified. The PEIR comprised the information that was compiled by the Applicant to enable the prescribed consultees to develop an informed view of the likely significant effects of the Scheme.
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.	As detailed in the Consultation Report [EN0110014/APP/5.1] and associated appendices, the Applicant has undertaken non-statutory consultation, statutory consultation and targeted consultation. The Consultation Report [EN0110014/APP/5.1] and associated appendices also set out engagement that has been undertaken throughout the pre-application stage. Regard has been had to the feedback received through the consultations and following discussions with technical officers at SNC/NCC.
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	As described in the responses above, the Applicant undertook a multi-phased consultation to enable the iterative development of proposals in response to the ongoing consideration of feedback received. The Consultation Report [EN0110014/APP/5.1] concludes that

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	reasonably and met the statutory requirements there should be no objections to the adequacy of the consultation process.	consultation has been informed by and complied with the requirements of the PA 2008 and associated guidance and legislation. The Applicant has sought to address comments, concerns and issues raised in the design of the Scheme where practicable and has responded to comments raised in the Consultation Report [EN0110014/APP/5.1]. The DCO Application includes a proportionate and focused ES setting out the identification of likely significant effects of the Scheme, and the mitigation measures considered to address these. The Applicant considers that the DCO Application for development consent is considered ready for examination. 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 [EN0110014/APP/6.1] and the Consultation Report [EN0110014/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 2008 system is designed to be frontloaded and applications should not enter the statutory system if they are 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. Applications should be proportional, clear and focused in order to ensure the planning process can move at the pace required to meet the Clean Power 2030 Mission. Applicants must ensure their applications are concise whilst still containing the necessary, high quality, information the Examining Authority, statutory consultees and the Secretary of State expect to see in order to make an informed decision. The ES should therefore be proportionate and focused, with just the sufficient detail required to clearly identify 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 cohesively 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 identify all the relevant	

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	issues, agree the majority of those 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 view 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. Applicants should seek to take a standard approach to issues like compulsory purchase powers, the discharge of requirements and arbitration. Applicants should not introduce subtle changes 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.	
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 and net zero. 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 the Planning Statement [EN0110014/APP/7.14] , the Scheme is classified as low carbon infrastructure and is CNP Infrastructure. The Statement of Need [EN0110014/APP/7.11] and Planning Statement [EN0110014/APP/7.14] 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.
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. EfW developments are not critical to meeting the Clean Power 2030 Mission and therefore CNP policy does not apply to applications for EfW projects. 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	For reasons set out in the Planning Statement [EN0110014/APP/7.14] , the Scheme meets the definition of CNP Infrastructure. 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.

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	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. 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 are also classed as low carbon infrastructure for the purposes of this policy.	
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 [EN0110014/APP/7.11] 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. This Statement of Need provides evidence on the substantial benefits brought forward by large-scale ground mounted solar electricity generation generally and, the Scheme specifically, towards meeting the UK's critical strategic needs and 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 when assessing the planning balance within the Planning Statement [EN0110014/APP/7.14] .
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 Planning Statement [EN0110014/APP/7.14] summarises the needs and benefits of the Scheme and provides an appraisal of the Scheme against the relevant policy and legislative framework, drawing upon the conclusions of the ES and other DCO Application documentation. It concludes that adverse effects have been appropriately managed and that the residual significant adverse effects are outweighed by the residual significant benefits. Consideration is also given to the CNP presumption and concludes that, given the Applicant has demonstrated the Scheme is in accordance with national policy, the mitigation hierarchy has been applied and compliance with other legal and regulatory requirements has been demonstrated, the CNP presumption applies to the Scheme.
4.2.21	During decision making, the CNP policy will influence how non-HRA and non-Marine Conservation Zone (MCZ) impacts are considered in the planning balance. The policy will therefore also influence how the Secretary of State considers whether tests requiring clear outweighing of harm, exceptionality, or very special circumstances have been met by a CNP Infrastructure application. Further detail is provided in paragraphs 4.2.28 to 4.2.30, and Figure 2.	The Applicant has considered this NPS and relevant technology specific energy NPS, applying the mitigation hierarchy, as well as any other legal and regulatory requirements to the Scheme as CNP Infrastructure. The ES [EN0110014/APP/6.1-6.4] provides the baseline environmental information, the description of the likely significant environmental effects arising from all phases of the Scheme and the mitigation measures, as well as any necessary monitoring measures. As set out in Volume 1 of the ES [EN0110014/APP/6.1] consideration has been given to two types of cumulative effects in the assessments: in-combination effects and cumulative effects.
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	

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	hierarchy, as well as any other legal and regulatory requirements.	In addition, the Applicant has followed the mitigation hierarchy, starting from the site selection stage and informing the design of the Scheme to avoid, reduce and mitigate, adverse effects as far as practicable. To ensure clarity regarding how the proposed embedded mitigation measures are secured, the following management plans have been submitted with the DCO Application:
4.2.24	Applicants must apply the mitigation hierarchy and demonstrate that it has been applied. They should also seek the advice of the appropriate SNCB or other relevant statutory body when undertaking this process. Applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated. Measures that result in a significant reduction in generation capacity for CNP infrastructure are unlikely to be considered to be appropriate as mitigation. There may be exceptional circumstances where the mitigation could have a significant benefit and warrant a small reduction in generation capacity and function. In these circumstances, the Secretary of State may decide that the benefits of the mitigation to reduce the effects outweigh the marginal loss of function.	• Outline CEMP [EN0110014/APP/7.1]; • Outline CTMP [EN0110014/APP/7.6]; • Outline OEMP [EN0110014/APP/7.2]; • Outline OTMP [EN0110014/APP/7.7]; • Outline DEMP [EN0110014/APP/7.3]; • Outline LEMP [EN0110014/APP/7.4]; • Outline PRoWPPMP [EN0110014/APP/7.8]; • Outline SRMP [EN0110014/APP/7.9]; • Outline BSMP [EN0110014/APP/7.5]; and • Outline ESSCS [EN0110014/APP/7.10].
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.	In addition, Design Principles, Parameters and Commitments [EN0110014/APP/7.18] has been included within the DCO Application as a control document.
4.2.27	The Secretary of State will continue to consider the impacts and benefits of all CNP Infrastructure applications on a case-by-case basis. The Secretary of State must be satisfied that the applicant's assessment demonstrates that the requirements set out above have been met. Where the Secretary of State is satisfied that they have been met, the CNP presumptions set out below apply.	The Statement of Need [EN0110014/APP/7.11] 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.
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	For reasons set out in the Planning Statement [EN0110014/APP/7.14] , the Scheme meets the definition of CNP Infrastructure. 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. As demonstrated in the Planning Statement, there are no residual impacts as a result of the Scheme which would outweigh the

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	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. 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.	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, offshore navigation or onshore flood and coastal erosion. The Scheme is not located within the Green Belt nor a nationally designated landscape. Further, no substantial harm to or loss of significance to heritage assets is anticipated. There are no sensitive designations to prevent the Scheme from helping deliver the CNP Infrastructure to contribute to the UK’s urgent requirement for the delivery of new renewable energy generation capacity and infrastructure.
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 NPPs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances.	
4.2.30	This means that the Secretary of State will take as a starting point that CNP Infrastructure will meet the following, non-exhaustive, list of tests: • Where development within a Green Belt requires very special circumstances to justify development; • Where development within or outside a Site of Special Scientific Interest (SSSI) requires the benefits (including need) of the development in the location proposed to clearly outweigh both the likely impact on features of the site that make it a SSSI, and any broader impacts on the national network of SSSIs. • Where development in nationally designated landscapes requires exceptional circumstances to be demonstrated; and • Where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional.	
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	The DCO Application is accompanied by an ES [EN0110014/APP/6.1 - 6.4] that identifies the likely significant environment effects of all phases of the Scheme, both beneficial and adverse effects. The ES [EN0110014/APP/6.1 – 6.4] presents an assessment of environmental, social

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	Environmental Statement (ES) describing the aspects of the environment likely to be significantly affected by the project.	and economic effects that have been scoped into the EIA. The ES [EN0110014/APP/6.1 – 6.4] also sets out embedded and additional mitigation that are secured through various management plans that are listed in the above responses.
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, biodiversity net gain, community cohesion, health and well-being.	In addition, the DCO Application is accompanied by a suite of other documents including an Equality Impact Assessment [EN0110014/APP/7.19] and Biodiversity Net Gain Report [EN0110014/APP/7.23] . The Planning Statement [EN0110014/APP/7.14] sets out the wider benefits that arise from the Scheme, beyond making a significant contribution to the UK's policy commitments and legal decarbonisation targets.
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 [EN0110014/APP/6.1 – 6.4] covers the environmental, social and economic effects arising from the pre-construction, construction, operation and decommissioning phases of the Scheme.
4.3.9	As in any planning case, the relevance or otherwise to the decision making process of the existence (or alleged existence) of alternatives to the proposed development is, in the first instance, a matter of law. This NPS does not contain any general requirement to consider alternatives or to establish whether the proposed project represents the best option from a policy perspective. Although there are specific requirements in relation to compulsory acquisition and habitats sites, the NPS does not change requirements in relation to compulsory acquisition and habitats sites.	The Site Selection Assessment [EN0110014/APP/7.20] provides details of the initial site selection process for the land within the Order Limits having regard to the factors influencing site selection and design, as set out in NPS EN-3. This Site Selection Assessment sets out the alternative sites considered for the National Grid Substation as well as an evaluation of potential development areas and zones for solar development. In response to consultation feedback, environmental surveys and the environmental assessment process, the design of the Scheme has evolved during the pre-application stage. The Design Approach Document [EN0110014/APP/7.17] sets out the Scheme vision and the project level design principles that provided a clear framework for evolution of the Scheme's design since inception to ensure that good design is embedded within the design process. The EIA Regulations require that an ES should include a description of the reasonable alternatives studied by the Applicant. Accordingly, ES Volume 1, Chapter 5 – Reasonable Alternatives and Design Evolution [EN0110014/APP/6.1.5] describes the reasonable alternatives considered including the consideration of alternative technology, sites and layout. Whilst seeking compulsory acquisition powers, the Applicant has been seeking to acquire the relevant land, new rights and temporary use of land by voluntary agreement to ensure implementation of the Scheme. Further details are contained within the Statement of Reasons [EN0110014/APP/4.1] .

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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 EIA, the findings of which are presented in ES [EN0110014/APP/6.1 - 6.4] has been undertaken in accordance with the requirements of the EIA Regulations. The ES is proportionate to the scale of the Scheme.
4.3.11	In some instances, it may not be possible at the time of the application for development consent for all aspects of the proposal to have been settled in precise detail. Where this is the case, the applicant should explain in its application which elements of the proposal have yet to be finalised, and the reasons why this is the case.	The Applicant wishes to retain flexibility in the design of the Scheme at the time of submission so that the detailed design of the Scheme can be informed by technical considerations, post-consent work and take advantage of innovation in technology. The extent of the flexibility is detailed in ES Volume 1, Chapter 4 - The Scheme [EN0110014/APP/6.1.4] .
4.3.12	Where some details are still to be finalised, the ES should, to the best of the applicant's knowledge, assess the likely worst-case environmental, social and economic effects of the proposed development to ensure that the impacts of the project as it may be constructed have been properly assessed.	The approach to the EIA is described in ES Volume 1, Chapter 2 - EIA Methodology [EN0110014/APP/6.1.2]. The ES adopts the Rochdale Envelope approach to maintain flexibility in the design and layout of the Scheme in the DCO Application. The Rochdale Envelope ensures a robust reasonable worst-case assessment of the likely significant environmental effects of the Scheme. The maximum parameters of the Scheme are shown spatially on the Works Plan [EN0110014/APP/2.3] and described in the Design Principles, Parameters and Commitments [EN0110014/APP/7.18], with further measures secured in various management plans submitted with the DCO Application. These form the basis of the ES [EN0110014/APP/6.1 - 6.4]. The ES outlines the assumptions and limitations associated with the assessments. The Applicant has considered a reasonable worst-case scenario within the ES [EN0110014/APP/6.1 - 6.4].
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.	A description of the reasonable alternatives studied by the Applicant is provided in the ES Volume 1, Chapter 5 - Reasonable Alternatives and Design Evolution [EN0110014/APP/6.1.5] . This includes consideration of alternative generation technologies, alternative sites and design evolution.
4.3.16	In some circumstances, the NPSs may impose a policy requirement to consider alternatives.	The Site Selection Assessment [EN0110014/APP/7.20] sets out the site selection and evaluation process for the siting of the proposed National Grid Substation and solar development areas.
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.	

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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.	As described in the response above, the approach to the EIA is described in ES Volume 1, Chapter 2 - EIA Methodology [EN0110014/APP/6.1.2] . The ES adopts the Rochdale Envelope approach to maintain flexibility in the design and layout of the Scheme in the DCO Application. The Rochdale Envelope ensures a robust reasonable worst-case assessment of the likely significant environmental effects of the Scheme.
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.	ES Volume 1, Chapter 2 - EIA Methodology [EN0110014/APP/6.1.2] sets out the approach to the cumulative assessments for the EIA. The ES [EN0110014/APP/6.1 - 6.4] considers in-combination effects and effects of the Scheme with other cumulative schemes. The in-combination effects are presented in ES Volume 1, Chapter 19 - In-Combination Effects Assessment [EN0110014/APP/6.1.19] and the cumulative assessment of the Scheme with cumulative schemes is present in ES Volume 1, Chapters 6 to 18 [EN0110014/APP/6.1.6-18] .
4.3.22	Given the level and urgency of need for new energy infrastructure, the Secretary of State should, subject to any relevant legal requirements (e.g. under the Habitats Regulations) which indicate otherwise, be guided by the following principles when deciding what weight should be given to alternatives: - The consideration of alternatives in order to comply with policy requirements should be carried out in a proportionate manner; and - Only alternatives that can meet the objectives of the proposed development need to be considered.	The Statement of Need [EN0110014/APP/7.11] explains that the location of a point of connection to infrastructure which has the capacity to transmit the energy is an important driver for site selection for large-scale solar schemes. The Statement of Need concludes that the proposed location of the Scheme is appropriate for large-scale solar because solar irradiance is sufficient, and suitable land has been secured. Further, the Scheme would connect to a new grid connection point on an existing part of the National Electricity Transmission System, efficiently optimising the use of an already existing national infrastructure asset for the required capacity and in the timeframes indicated. As well as the point of connection, the Site Selection Assessment [EN0110014/APP/7.20] describes the other factors considered during the site selection process, including the factors influencing site selection and design, as set out in NPS EN-3. The Site Selection Assessment considers alternative sites for the National Grid Substation, potential development areas for solar (including previously developed land and commercial rooftops) and subsequently considers alternative development zones. Consideration of the alternative development zones against the Scheme show that they perform no better than the land within the Order Limits, and notably the Applicant is not able to demonstrate that such sites are available to participate in the Scheme.
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.	
4.3.24	The Secretary of State should not refuse an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site, and should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals.	In addition, ES Volume 1, Chapter 5 - Reasonable Alternatives and Design Evolution [EN0110014/APP/6.1.5] sets out an assessment of the reasonable alternatives considered by the Applicant as required by the EIA Regulations. As described within the ES, the assessment

Relevant Paragraph	Detail	Scheme Compliance
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.	of alternatives within the DCO Application has only considered reasonable alternatives that can meet the objectives of the Scheme. Within the Order Limits, the Applicant has identified suitable land, with willing landowners wishing to participate in the Scheme concurrently with undertaking discussions in respect of a grid connection offer. 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 it is noted that sites considered as an alternative may be needed for future proposals. 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.
4.3.27	Alternative proposals which mean the necessary development could not proceed, for example because the alternative proposals are not commercially viable or alternative proposals for sites would not be physically suitable, can be excluded on the grounds that they are not important and relevant to the Secretary of State’s decision.	
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.	
Health		
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.	A Human Health Summary Statement is presented in ES Volume 1, Chapter 18 - Other Environmental Matters (OEM) [EN0110014/APP/6.1.18] that provides a summary on human health, including effects from climate change, water environment, landscape and visual, transport and access, air quality, noise and vibration, socio-economics, agriculture, ground conditions and electromagnetic fields (EMF). It concludes that no residual significant adverse effects from the Scheme on population human health are anticipated at any stage of the Scheme following the implementation of mitigation. Significant residual beneficial effects have been identified in relation to socio-economics. The Human Health Summary also considers the in-combination effects and cumulative effects with other schemes.
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.	

Relevant Paragraph	Detail	Scheme Compliance
4.4.6	Opportunities should be taken to mitigate indirect impacts, by promoting local improvements to encourage health and wellbeing. This includes potential impacts on vulnerable groups within society and impacts on those with protected characteristics under the Equality Act 2010, i.e. those groups which may be differentially impacted by a development compared to wider society as a whole.	The Equality Impact Assessment [EN0110014/APP/7.19] considers how the Scheme may affect people with protected characteristics as defined by the Equality Act 2010. The Equality Impact Assessment [EN0110014/APP/7.19] concludes that the Applicant has given due regard to the requirements of the Equality Act 2010 and the Public Sector Equality Duty, as required under section 149 of the Equality Act 2010. The Equality Impact Assessment [EN0110014/APP/7.19] has identified both potential benefits such as employment and improved PRoW connectivity and negative equality impacts such as temporary PRoW diversions and increased levels of traffic, noise, and air pollutants. The assessment has concluded that, with mitigation in place, most negative equality impacts are not likely to be substantial. Embedded mitigation has been incorporated into the various management plans submitted with the DCO Application, including the Outline CEMP [EN0110014/APP/7.1] , Outline PRoWPPMP [EN0110014/APP/7.8] , Outline CTMP [EN0110014/APP/7.6] , Outline OEMP [EN0110014/APP/7.2] and the Outline DEMP [EN0110014/APP/7.3] .
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.	
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.	ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] considers the ecological and biodiversity impacts of the Scheme across the construction, operational and decommissioning phases. With embedded mitigation in place, no significant residual adverse effects have been identified during the construction phase. Significant residual beneficial effects during the operation phase have been identified in relation to amphibians, breeding birds, badgers and riparian mammals ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] confirms the mitigation hierarchy applied during the design of the Scheme follows an approach where there is potential for impacts on relevant Important Ecological Features: Avoidance – actions taken to avoid causing impacts to the environment prior to beginning development (e.g. avoidance of installing Solar PV Arrays on or near Important Ecological Features to avoid direct and indirect impacts);
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.	

Relevant Paragraph	Detail	Scheme Compliance
4.6.7	In England applicants for onshore elements of any development are encouraged to use the latest version of the biodiversity metric to calculate their biodiversity baseline and present planned biodiversity net gain outcomes. This calculation data should be presented in full as part of their application.	- Minimisation – measures taken to reduce the duration, intensity, extent and/or likelihood of the unavoidable environmental impacts caused by development (e.g. adapting the development design to minimise impacts); - Restoration or rehabilitation – actions taken to repair environmental degradation or damage following unavoidable impacts caused by development; and - Offsets – measures taken to compensate for any adverse environmental impacts caused by development which cannot be avoided, minimised and/or restored (e.g. including habitat creation to offset losses).
4.6.8	Where possible, this data should be shared, alongside a completed biodiversity metric calculation, with the Local Authority, Natural England and, where relevant, the EA, for discussion at the pre-application stage as it can help to highlight biodiversity and wider environmental issues which may later cause delays if not addressed.	The Scheme's design evolution has sought to avoid relevant Important Ecological Features, such as hedgerows, watercourses and woodlands, as far as practicable. This includes the design buffers in the Design Principles, Parameters and Commitments [EN0110014/APP/7.18] and Works Plan [EN0110014/APP/6.1.8] and includes the adoption of project level design principles to guide decision making and embed good design outcomes into the Scheme. The Biodiversity Net Gain Report [EN0110014/APP/7.23] sets out how a minimum of 10% net gain will be achieved for the Scheme using the Statutory Biodiversity Metric. The Scheme will deliver, as a minimum, 10% BNG, which is secured in the draft DCO [EN0110014/APP/3.1]. The ecological mitigation and enhancement within the Scheme is predicted to provide a net gain of 37.42% for habitats, 31.35% for hedgerows and 16.08% for watercourses. There is no BNG set to be delivered off-site. As confirmed in the Biodiversity Net Gain Report [EN0110014/APP/7.23], the assessment has been prepared with reference to best practice guidance published by the Chartered Institute for Ecology and Environmental Management (CIEEM, 2021); British Standard 8683:2021 'Process for designing and implementing Biodiversity Net Gain. Specification'; and CIEEM, CIRIA, IEMA (2016) 'Biodiversity Net Gain: Good practice principles for development'. Details of the engagement carried out by the Applicant in relation to the Scheme are set out in the Consultation Report [EN0110014/APP/5.1]. The BNG assessment for the Scheme has not been shared with the local planning authority nor Natural England principally as surveys underpinning the assessment were ongoing until close to submission of the DCO Application and the results could change quite considerably as more survey data is collected. An earlier version of the BNG assessment was not shared either, due to the uncertainty until the final design was established.
4.6.10	Biodiversity net gain should be applied after compliance with the mitigation hierarchy and does not change or replace existing environmental obligations.	
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.	

Relevant Paragraph	Detail	Scheme Compliance
		The Outline LEMP [EN0110014/APP/7.4] describes habitat creation, management and monitoring prescriptions to mitigate and enhance biodiversity. Enhancement includes the provision of varied mosaic of habitat creation such as flower rich pollinator, tussocky, neutral and modified grassland and restoration of ghost ponds, where practicable, increasing habitat connectivity. Local conservation priorities in relation to the Norfolk Wildlife Trust South Norfolk Claylands and initiatives of the Norfolk Local Nature Recovery Strategy have been considered within the Outline LEMP [EN0110014/APP/7.4]. The Outline LEMP [EN0110014/APP/7.4] also includes the provision of habitat boxes for birds, bats and hedgehogs, together with the provision of skylark plots within retained agricultural land.
4.6.13	In addition to delivering biodiversity net gain, developments may also deliver wider environmental gains and benefits to communities relevant to the local area, and to national policy priorities, such as • reductions in GHG emissions, • reduced flood risk, • improvements to air, water or soil quality, • climate adaptation, • landscape enhancement, • increased access to natural greenspace, and/or • the enhancement, expansion or provision of trees and woodlands The scope of potential gains will be dependent on the type, scale, and location of specific projects. Applicants should look for a holistic approach to delivering wider environmental gains and benefits through the use of nature-based solutions and Green Infrastructure.	The Planning Statement [EN0110014/APP/7.14] sets out the wider benefits of the Scheme beyond making a significant contribution to net zero targets. • Green Energy and Climate Change: the Scheme would make a significant and timely contribution to meeting the Government's targets of Clean Power by 2030 and net zero by 2050, together with overall GHG net savings; • Landscape, Green Infrastructure and Habitat Creation: the Scheme would strengthen habitat connectivity at a landscape scale and positively contribute to local green infrastructure, together with improving the quality and the extent of habitats; • Publicly Accessible Space: the Scheme would provide publicly accessible space including approximately 850m of permissive paths and up to 19.8ha new community accessible space; and • Biodiversity: the Scheme will deliver, as a minimum, 10% BNG. Furthermore, the Scheme would be designed to be adaptive and resilient to climate change. The provision of all year-round grassland/wildflower meadow beneath the Solar PV Arrays will reduce soil erosion, contribute to greater interception/evapotranspiration of rainfall and increase ground roughness across the fields, thereby slowing the rate of runoff across Sites. This would reduce flooding to villages located at the bottom of drainage catchments.
4.6.14	The Environment Act 2021 mandated the preparation of LNRs 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. LNRs 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	The Green Infrastructure Strategy illustrates approximately 25ha of new tree planting (in addition to hedgerow tree improvements) within the Scheme. As a result, this is considered to support NPS EN-1 and responds to the initiatives of the Local Nature Recovery Strategy. The Norfolk Local Nature Recovery Strategy and how this has informed the design approach to the Scheme is described in the Design Approach Document [EN0110014/APP/7.4]. Local

Relevant Paragraph	Detail	Scheme Compliance
	environmental outcomes for water and flood risk, carbon and tree planting and woodland creations. LNRs will also drive the creation of a Nature Recovery Network (NRN), a major commitment in the government's Environmental Improvement Plan.	conservation priorities in relation to the Norfolk Wildlife Trust South Norfolk Claylands and initiatives of the Norfolk Local Nature Recovery Strategy have been considered within the Outline LEMP [EN0110014/APP/7.4] .
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 in the ES [EN0110014/APP/6.1 – 6.4] , Outline LEMP [EN0110014/APP/7.4] and summarised in the Planning Statement [EN0110014/APP/7.14] .
4.6.17	Where environmental net gain considerations have featured as part of the strategic options appraisal process to select a project, applicants should reference that information to supplement the site-specific details.	The Site Selection Assessment [EN0110014/APP/7.20] describes factors considered during the site selection process, which has considered environmental and planning constraints. The Design Approach Document [EN0110014/APP/7.17] demonstrates how the design of the Scheme has been developed in accordance with a 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 to guide decision making and embed good design outcomes into the Scheme, together with establishing design buffers. The Design Approach Document illustrates the design evolution of the Scheme and where design decisions have responded to the local context. Throughout the design process, the Applicant maintained an interdisciplinary approach to design, considering both the opportunities and constraints. This included an analysis of the existing physical, environmental, social and cultural context of the Order Limits by a broad range of technical disciplines (including landscape and visual, noise, ecology, and heritage) as set out and assessed by ES [EN0110014/APP/6.1]. The Green Infrastructure Strategy in the Outline LEMP [EN0110014/APP/7.4] demonstrates the Scheme would provide extensive new and enhanced green infrastructure. This includes for the retention and enhancement of green infrastructure assets, including restoration of ghost ponds, where practicable, together with new tree and hedgerow planting.
4.6.19	Although achieving biodiversity net gain is not currently an obligation on applicants, Schedule 15 to the Environment Act 2021 contains provisions which, when commenced, mean the Secretary of State may not grant an application for a Development Consent Order unless satisfied that a biodiversity gain objective is met in relation to the onshore development in England to which the application relates.	The Scheme will deliver, as a minimum, 10% BNG, as set out in the Biodiversity Net Gain Report [EN0110014/APP/7.23] . The ecological mitigation and enhancement within the Scheme will deliver a potential net gain of 37.42% for habitats, a net gain of 31.35% for hedgerows and 16.08% for watercourses.

Relevant Paragraph	Detail	Scheme Compliance
4.6.20	The biodiversity gain objective will be set out in a biodiversity gain statement (as defined under the Environment Act 2021). Normally these statements would be included within an NPS, but the Act allows for the statement to be published separately where a review of an NPS has begun before the provisions are commenced, as is the case with these energy NPSs. Under the provision of the Environment Act 2021, any such separate biodiversity gain statement will be regarded as being contained within these NPSs.	Consideration has been given to the ecological enhancements of the Scheme in the planning balance, as set out within the Planning Statement [EN0110014/APP/7.14] .
4.6.21	The Secretary of State should give appropriate weight to environmental and biodiversity net gain, although any weight given to gains provided to meet a legal requirement (for example under the Environment Act 2021) is likely to be limited.	
Criteria for Good Design for 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.	The Design Approach Document [EN0110014/APP/7.17] demonstrates how the design of the Scheme has been developed in accordance with a 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 to guide decision making and embed good design outcomes to the Scheme, together with establishing design buffers (offsets). It has been prepared in accordance with the Planning Inspectorate’s NSIP Advice Page on Good Design. As well as setting out the approach and environmental strategies to the design, the Design Approach Document [EN0110014/APP/7.17] provides examples of design decisions taken and the rationale for these decisions. It also identifies the mechanisms by which good design will be secured post consent. As detailed in the Design Approach Document [EN0110014/APP/7.17] , the Scheme has undergone an iterative design process following consultation feedback, environmental surveys and the environmental assessment process. Along with technical considerations, this has resulted in the delivery of a functional and efficient Scheme design which will deliver large amounts of renewable and low carbon energy while responding to the local context and minimising impacts on the environment as far as practicable. As recognised within the design policies set out in the NPS, 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. Alternatives to the Scheme is presented in ES Volume 1, Chapter 5 - Reasonable Alternatives and Design
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	

Relevant Paragraph	Detail	Scheme Compliance
	construction and sustainable design practices such as use of sustainable timber and low carbon concrete. Where possible, projects should include the reuse of material.	Evolution [EN0110014/APP/6.1.5] and the Site Selection Assessment [EN0110014/APP/7.20] .
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.	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 Order Limits by a broad range of technical disciplines (including landscape and visual, noise, ecology).
4.7.5	To ensure good design is embedded within the project development, a project board-level design champion could be appointed, and a representative design panel used to maximise the value provided by the infrastructure. Design principles should be established from the outset of the project to guide the development from conception to operation. Applicants should consider how their design principles can be applied post-consent.	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 respond to the local context. As detailed in the Design Approach Document [EN0110014/APP/7.17] , a project Board Level Design Champion has been appointed to ensure good design is embedded into the Scheme to advocate a good practice design approach and share lessons learned. In addition to the Applicants' Board Level Design Champion, the Applicant also appointed a project level Design Champion to lead the design process and ensure a multi-disciplinary approach. The appointed Design Champion for the Scheme was the landscape architect, who has prior experience in leading the design of other DCO solar projects. The project level Design Champion was responsible for developing the Indicative Masterplan and the Green Infrastructure Strategy.
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.	The Design Principles, Parameters and Commitments [EN0110014/APP/7.18] set out the parameters and commitments for the Scheme that the detailed design must accord with as per the draft DCO [EN0110014/APP/3.1] . Embedded measures are also incorporated into various management plans.
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 detailed in the Design Approach Document [EN0110014/APP/7.17] , the Scheme has undergone an iterative design process following consultation feedback, environmental surveys and the environmental assessment process. This includes examples of design decisions taken and the rationale for these decisions. In accordance with the EIA Regulations, ES Volume 1, Chapter 5 - Reasonable Alternatives and Design Evolution [EN0110014/APP/6.1.5] considers the reasonable alternatives studied by the Applicant and also provides a summary of the design evolution of the Scheme.
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	The Applicant has not sought independent design review given the design of the Scheme has evolved through input from a team of experienced professionals including highways engineers, planners, landscape architects, ecologists, heritage specialists and other relevant

Relevant Paragraph	Detail	Scheme Compliance
	nationally significant infrastructure projects and applicants are encouraged to use this service. Applicants should also consider any design guidance developed by the LPA.	environmental professionals. The design team for the project is described in the Design Approach Document [EN0110014/APP/7.17]. During the pre-application stage, the Applicant has engaged with a range of stakeholders, including technical officers at NCC and SNC, together with having regard to feedback received during consultation, which has informed the design process. Examples of how the design changes have been made in response to consultation feedback is provided in the Design Approach Document [EN0110014/APP/7.17].
4.7.10	In the light of the above and given the importance which the Planning Act 2008 places on good design and sustainability, the Secretary of State needs to be satisfied that energy infrastructure developments are sustainable and, having regard to regulatory and other constraints, are as attractive, durable, and adaptable (including taking account of natural hazards such as flooding) as they can be.	As demonstrated in the Site Selection Assessment [EN0110014/APP/7.20] environmental and planning constraints were considered in the initial site selection process. The Design Approach Document [EN0110014/APP/7.17] has been prepared having consideration of the Planning Inspectorate's NSIP Advice Page on Good Design. The advice is intended to complement the legislation, regulations and guidance issued by the Government. The application of the Scheme vision and project level design principles is described in the Design Approach Document [EN0110014/APP/7.17] together with the design evolution of the Scheme through the different stages of design. The Scheme has undergone an iterative design process which has resulted in the delivery of a functional and efficient design that will deliver large amounts of renewable and low carbon energy while responding to the local context 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.	As described in the responses above, the Design Approach Document [EN0110014/APP/7.17] demonstrates how the design of the Scheme has been developed and the mechanisms by which good design will be secured post consent.
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.	Commitments regarding design, including for aesthetics, design buffers and safety, are secured through the Design Principles, Parameters and Commitments [EN0110014/APP/7.18]. Further embedded measures are secured through the various management plans, including the Outline LEMP [EN0110014/APP/7.4] and Outline BSMP [EN0110014/APP/7.5]. The Outline LEMP [EN0110014/APP/7.4] describes habitat creation, management and monitoring prescriptions to mitigate and enhance biodiversity. The Outline LEMP [EN0110014/APP/7.4] also includes the Green Infrastructure Strategy that demonstrates extensive landscaping planting.

Relevant Paragraph	Detail	Scheme Compliance
		Specific fire safety provisions for the BESS proposed to be installed as part of the Scheme are set out in the Outline BSMP [EN0110014/APP/7.5]. 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 Order Limits by a broad range of technical disciplines (including landscape and visual, noise, ecology). Effects of the Scheme have been avoided or minimised as far as practicable. However, ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7] identifies significant adverse residual effects in relation to national and local landscape character, landscape character and features within the Order Limits and the visual amenity from representative locations, such as from PRoW.
4.7.13	The Secretary of State should consider such impacts under the relevant policies in this NPS. Assessment of impacts must be for the stated design life of the scheme rather than a shorter time period	ES [EN0110014/APPAPP/6.1 – 6.4] presents an assessment of the likely significant effects of the Scheme, including for the operational phase which expands up to a 60-year life span.
Climate Change Adaptation 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.	The project level design principles in the Design Approach Document [EN0110014/APP/7.17] include commitments to reduce carbon emissions during all phases of the Scheme, together with retention and enhancement of existing vegetation, as far as practicable and to manage surface water drainage. Flexibility is sought in the design for resilience and adaptation to climate change through the design process. ES Volume 1, Chapter 6 – Climate Change [EN0110014/APP/6.1.6] sets out the Scheme's resilience to climate change. This includes working practices (including protection from extreme weather), surface water drainage measures and cooling systems, which will be secured through various management plans submitted with the DCO Application, as set out in the Outline LEMP [EN0110014/APP/7.4], Outline CEMP [EN0110014/APP/7.1] and Outline OEMP [EN0110014/APP/7.2]. The Outline LEMP [EN0110014/APP/7.4] includes objectives for different types of habitats to contribute to the resilience and adaptation to climate change, including for example, species selection that will provide a climatically resilient planting mix. Further design commitments relevant to adaptation are secured in the Design Principles,
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.	

Relevant Paragraph	Detail	Scheme Compliance
	Adaptation is therefore necessary to deal with the potential impacts of these changes that are already happening.	Parameters and Commitments [EN0110014/APP/7.18]. ES Volume 1, Chapter 6 – Climate Change [EN0110014/APP/6.1.6] concludes that the embedded measures are considered an adequate response to the projected climate change impacts to which the Scheme would be exposed.
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 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.	Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1] sets out how the Scheme will take account of the projected impacts of climate change. Taking into account climate change, this assessment demonstrates the management of surface water drainage within the areas of the National Grid Substation, Project Substations and BESS, together with that the Scheme is safe and will not detrimentally impact on flood risk within the Order Limits or elsewhere.
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).	The Order Limits are within a region that is identified as 'seriously stressed'. As reported ES Volume 3, Appendix 9.3 – Water Resources Assessment [EN0110014/APP/6.3.9.1] water neutrality options have been given priority to reduce the supply requirements. These options include rainwater harvesting, on-site water storage and water tankering (to meet peak demand). Tankering is the preferred method of supply.
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.	The assessment in ES Volume 1, Chapter 6 – Climate Change [EN0110014/APP/6.1.6] considers climate change risk resilience, including where relevant, interactions with other environmental disciplines. The assessment concludes no significant climate change risks during the construction, operational or decommissioning phases of the Scheme.
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 gain, as well as increasing absorption of carbon dioxide from the atmosphere.	ES Volume 1, Chapter 6 - Climate Change [EN0110014/APP/6.1.6] concludes that with embedded and additional mitigation measures in place, a significant residual beneficial effect on global climate during the Scheme's operational phase. The embedded and additional mitigation measures are documented within the Outline CEMP [EN0110014/APP/7.1] , Outline OEMP [EN0110014/APP/7.2] , and Outline DEMP [EN0110014/APP/7.3] and secured via corresponding requirements of the draft DCO [EN0110014/APP/3.1] .

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		The Scheme also includes nature-based solutions as set out in the Outline LEMP [EN0110014/APP/7.4] . This consists of 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 need to remain operational over many decades, in the face of a changing climate. Consequently, applicants must consider the direct (e.g. site flooding, limited water availability, storms, heatwave and wildfire threats to infrastructure and operations) and indirect (e.g. access roads or other critical dependencies impacted by flooding, storms, heatwaves or wildfires) impacts of climate change when planning the location, design, build, operation and, where appropriate, decommissioning of new energy infrastructure.	ES Volume 1, Chapter 6 - Climate Change [EN0110014/APP/6.1.6], provides an assessment of the impacts of climate change and GHG emissions. This includes consideration of the use of water during the construction phase and the carbon emissions this would release. As described in the response above, the ES Volume 1, Chapter 6 – Climate Change [EN0110014/APP/6.1.6] sets out the Scheme’s resilience to climate change. This includes working practices (including protection from extreme weather), surface water drainage measures and cooling systems, which will be secured through various management plans submitted with the DCO Application, as set out in the Outline LEMP [EN0110014/APP/7.4], Outline CEMP [EN0110014/APP/7.1] and Outline OEMP [EN0110014/APP/7.2]. For example, as detailed in the Outline CEMP [EN0110014/APP/7.1], the Contractor will monitor weather forecasts and Environment Agency flood warnings to plan works accordingly, protecting workers and resources from any extreme weather related to heavy precipitation and flooding. Further, the Outline OEMP [EN0110014/APP/7.2] and the Design Principles, Parameters and Commitments [EN0110014/APP/7.18] set out management measures and commitments with regard to climate adaptation and resilience. Taking into account climate change, Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1] concludes that the Scheme, is safe and will not detrimentally impact on flood risk within the Order Limits or elsewhere. As reported ES Volume 3, Appendix 9.3 – Water Resources Assessment [EN0110014/APP/6.3.9.1] water neutrality options have been given priority to reduce the supply requirements. These options include rainwater harvesting, on-site water storage and water tankering (to meet peak demand). Tankering is the preferred method of supply.
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.	ES Volume 1, Chapter 6 - Climate Change [EN0110014/APP/6.1.6] sets out the legislation, planning policy and guidance relevant to the climate change assessment including, but not limited to considering the recommendations in ISEP’s ‘Environmental Impact Assessment Guide to: Accessing Greenhouse Gas Emission and Evaluating their Significance’.
4.10.10	Applicants should assess the impacts on and from their proposed energy project across a range of climate change	ES Volume 1, Chapter 6 - Climate Change [EN0110014/APP/6.1.6] , provides an assessment of the impacts of climate change and GHG emissions. This includes consideration of future

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	scenarios, in line with appropriate expert advice and guidance available at the time.	baseline and forecasts in climate change. For the assessment of climate change risk resilience, UKCP18 probabilistic projections have been provided for 30-year periods from 2020 - 2099 and obtained for climate variables which includes annual and seasonal changes in climatic conditions ES Volume 1, Chapter 6 - Climate Change [EN0110014/APP/6.1.6] concludes no significant adverse residual effects in terms of climate hazards during all phases of the Scheme and significant beneficial residual effects associated with GHG emissions and climate.
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.	As set out in the Sequential Test of the Planning Statement [EN0110014/APP/7.14], a sequential approach has been adopted for the design and layout of the Scheme to minimise flood risk by directing the most vulnerable aspects of the Scheme to areas of lowest flood risk as far as practicable. ES Volume 1, Chapter 6 – Climate Change [EN0110014/APP/6.1.6] sets out the Scheme's resilience to climate change. This includes working practices (including protection from extreme weather), surface water drainage measures and cooling systems, which will be secured through various management plans submitted with the DCO Application, as set out in the Outline LEMP [EN0110014/APP/7.4], Outline CEMP [EN0110014/APP/7.1] and Outline OEMP [EN0110014/APP/7.2]. The Design Principles, Parameters and Commitments [EN0110014/APP/7.18] also set out design commitments for flood risk, taking account climate change. Embedded measures in the management plans include, but are not limited to: • Working practices (including protection from extreme weather); • Using cooling systems and adapting working practices and equipment used based on weather conditions; • Different types of habitats to contribute to the resilience and adaptation to climate change; and • Surface water drainage measures. Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1] sets out how the Scheme will take account of the projected impacts of climate change. This assessment demonstrates the management of surface water drainage within the areas of the National Grid Substation, Project Substations and BESS, together with that the Scheme is safe and will not detrimentally impact on flood risk within the Order Limits or elsewhere.

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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. ES Volume 1, Chapter 6 - Climate Change [EN0110014/APP/6.1.6] provides an assessment of the impacts of climate change and GHG emissions. This includes consideration of future baseline and forecasts in climate change. For the assessment of climate change risk resilience, UKCP18 probabilistic projections have been provided for 30-year periods from 2020 - 2099 and obtained for climate variables which includes annual and seasonal changes in climatic conditions. For this assessment, RCP 8.5 has been used, which assumes a 'business as usual' pathway for climate change, which represents a worst-case scenario as recommended by the ISEP guidance.
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.	As set out in the Sequential Test of the Planning Statement [EN0110014/APP/7.14], a sequential approach has been adopted for the design and layout of the Scheme to minimise flood risk by directing the most vulnerable aspects of the Scheme to areas of lowest flood risk as far as practicable. The Scheme's design and embedded mitigation measures, as set out in the Outline LEMP [EN0110014/APP/7.4], Outline CEMP [EN0110014/APP/7.1] and Outline OEMP [EN0110014/APP/7.2] and Outline DEMP [EN0110014/APP/7.3], together with the Design Principles, Parameters and Commitments [EN0110014/APP/7.18] effectively address climate change risks.
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.	ES Volume 1, Chapter 6 - Climate Change [EN0110014/APP/6.1.6] confirms that the climate resilience assessment 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. Further, ES Volume 1, Chapter 6 - Climate Change [EN0110014/APP/6.1.6] concludes no significant adverse residual effects in terms of climate hazards during all phases of the Scheme and significant beneficial residual effects associated with GHG emissions and climate. ES Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1] demonstrates that the Scheme is safe and will not detrimentally impact on flood risk within the Order Limits or elsewhere.

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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.	As well as the sequential approach to design, the Outline OEMP [EN0110014/APP/7.2] sets out embedded measures in relation to GHG emissions and climatic hazardous such as stronger winds, heatwaves, heavy precipitation and increased risk of fires/wildfires. Further, measures will also include using equipment's cooling systems where necessary/adapting working practices and equipment based on current weather conditions, encouraging the use of lower carbon modes of transport and regular planned maintenance of the Scheme to optimise efficiency of infrastructure. ES Volume 1, Chapter 6 - Climate Change [EN0110014/APP/6.1.6] 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. The Scheme's design and embedded mitigation measures, as set out in the Outline LEMP [EN0110014/APP/7.4], Outline CEMP [EN0110014/APP/7.1] and Outline OEMP [EN0110014/APP/7.2] and Outline DEMP [EN0110014/APP/7.3] , together with the Design Principles, Parameters and Commitments [EN0110014/APP/7.18] effectively address climate change risks.
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 4.10.3 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 more extreme impacts of climate change, including credible maximum climate change scenarios, and that measure would have an adverse effect on other aspects of the project and/or surrounding environment (for example coastal processes), the Secretary of State may consider requiring the applicant to keep the need for the adaptation measure under review, and ensure that the measure could be implemented should the need arise, rather than at the outset of the development (for example increasing height of existing, or requiring new, sea walls).	
Network Connection		

Relevant Paragraph	Detail	Scheme Compliance
4.11.4	Transmission network infrastructure, and related network reinforcement and upgrade works, associated with nationally significant low carbon infrastructure is considered as CNP Infrastructure. Further guidance can be found in Section 4.2 of this NPS and EN-5.	The Planning Statement [EN0110014/APP/7.14] sets out the Scheme meets the definition of CNP Infrastructure, given that it has a capacity greater than 100MW capacity of a low carbon source of energy.
4.11.5	The applicant must liaise with National Grid who own and manage the transmission network in England and Wales or the relevant regional DNO or TSO to secure a grid connection.	The Applicant is making an application for a DCO for the Scheme, of which the Grid Connection Infrastructure forms part thereof. The Grid Connection Statement [EN0110014/APP/7.12] details the status of the grid connection offer, responsibilities and provides confirmation that the grid connection forms part of the Scheme and, as such, constitutes a single application to the Secretary of State.
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 [footnote 133]. 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.	The Applicant has received a valid grid connection offer from NESO to connect the Scheme to the National Grid Electricity Transmission along the overhead electrical transmission line via a new National Grid Substation.
4.11.7	The Planning Act 2008 aims to create a holistic planning regime so that the cumulative effect of different elements of the same project can be considered together. Co-ordinated applications typically bring economic efficiencies and reduced environmental impact. The government therefore envisages that wherever reasonably possible, applications for new generating stations and related infrastructure should be contained in a single application to the Secretary of State or in separate applications submitted in tandem which have been prepared in an integrated way, as outlined in EN-5. This is particularly encouraged to ensure development of more co-ordinated transmission overall.	The Grid Connection Statement [EN0110014/APP/7.12] confirmed that ongoing discussions are being had between the Applicant and NGET with regard to the configuration and layout of the new National Grid Substation and the reconfiguration of the overhead transmission line. In the latest of these discussions, NGET confirmed that there is sufficient space in the proposed area for the new National Grid Substation. The indicative location of the new National Grid Substation is shown in ES Volume 2, Figure 4.1 Indicative Masterplan. The new National Grid Substation and the Grid Connection Infrastructure which forms part of the Scheme has been assessed as part of the EIA, with the findings presented in the ES [EN0110014/APPAPP/6.1 – 6.4].

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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 [footnote 134] 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.	
4.11.12	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.	
Pollution Control and Other Environmental Regulatory Regimes		
4.12.7	Applicants should understand what non-planning permits / consents the development will require and consider the timings for gaining these permissions alongside the timing for gaining the DCO. They should make early contact with relevant regulators, including EA or NRW and the MMO, to discuss their requirements for Environmental Permits and other consents, such as marine licences. Applicants can access enhanced (paid for) pre-application support before applying for an environmental permit. Enhanced pre-	The Consents and Agreements Position Statement [EN0110014/APP/7.22] 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 [EN0110014/APP/3.1]. The Consultation Report [EN0110014/APP/5.1] and the ES [EN0110014/APPAPP/6.1 – 6.4] sets out the matters that the Applicant has engaged with the Environment Agency on to date.

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	application advice is recommended for complex or significant developments to ensure applications contain the necessary assessments to address the risks associated with the proposed activity. Applicants can also explore options, such as submitting their application in stages through this route if the application is complex or uses novel technologies. Early engagement on the permissions required for the development is strongly advised and helps the management of these within the timescale for development. This is particularly advisable in circumstances where applicants have a number of permissions to obtain from the EA for their development.	Natural Resources Wales and Marine Management Organisation were not contacted given that the Scheme is not relevant to these regulators.
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 is an acceptable use of the land or sea, and the impact of that use, rather than the control of processes, emissions or discharges themselves.	The land within and surrounding the Order Limits is predominantly agricultural. With the exception of the location of the National Grid Substation, Project Substations and BESS, the Scheme is not considered to impact the continued use of this land for agricultural purposes. An assessment of the impact of the Scheme is set out in ES Volume 1, Chapter 15 – Soils and Agricultural Land [EN0110014/APP/6.1.15]. The Site Selection Assessment [EN0110014/APP/7.20] describes the factors considered during the site selection process, including alternative sites for the National Grid Substation, potential development areas for solar (including previously developed land and commercial rooftops) and subsequently considers alternative development zones. Consideration of the alternative development zones against the Scheme show that they perform no better than the land within the Order Limits, and notably the Applicant is not able to demonstrate that such sites are available to participate in the Scheme.
4.12.10	The Secretary of State should work on the assumption that the relevant pollution control regime and other environmental regulatory regimes, including those on land drainage, water abstraction and biodiversity, will be properly applied and enforced by the relevant regulator. The Secretary of State should act to complement but not seek to duplicate those regulatory regimes, but without prejudice to the Secretary of	The Consents and Agreements Position Statement [EN0110014/APP/7.22] 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 [EN0110014/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

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	State's duty to 'secure' compliance with the relevant regulatory requirements.	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 [EN0110014/APP/7.22] 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 4.12.15 of NPS EN-1 and based on the Consents and Agreements Position Statement [EN0110014/APP/7.22] , 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 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	Working in close cooperation with the EA or NRW and/or the pollution control authority, and other relevant bodies, such as the MMO, the SNCB, Drainage Boards, and water and sewerage undertakers, the Secretary of State should be satisfied, before consenting any potentially polluting developments, that: - the relevant pollution control authority is satisfied that potential releases can be adequately regulated under the pollution control framework - the relevant pollution control authority is satisfied that potential releases can be adequately regulated under the pollution control framework	
Safety		
4.13.5	Applicants should consult with the HSE on matters relating to safety.	The Applicant has consulted with the HSE on matters relating to safety as part of the scoping for the EIA. 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 Notwithstanding the fact that BESS is not applicable to the COMAH Regulations 2015, the DCO Application is accompanied by an Outline BSMP EN0110014/APP/7.25] , 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.	
4.13.7	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.	

Relevant Paragraph	Detail	Scheme Compliance
4.13.8	The Secretary of State should be satisfied that a safety assessment has been prepared, where required, and that the Competent Authority has raised no safety objections.	
Hazardous Substances		
4.14.5	Applicants must consult the HSA and HSE at pre-application stage if the project is likely to need hazardous substances consent. Hazardous substances consents are a part of the planning regime which contributes to public safety.	HSE advised (see ES Volume 3, Appendix 2.2 - East Pye EIA Scoping Opinion [EN0110014/APP/6.3.2.2]) that part of the Order Limits is within the Hazardous Substance Consent 'Consultation Zone' of the Gas Power Services Site and the Natural Gas 5 Feeder pipeline. Engagement has been undertaken with Natural Gas during the pre-application stage regarding the high-pressure gas pipeline that extends through the Order Limits. Offsets have been embedded into the design of the Scheme. Where necessary, separate Hazardous Substance Consent will be sought.
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).	A Statutory Nuisance Statement [EN0110014/APP/7.13] has been submitted with the DCO Application, as is required under APPF Regulation 5(2)(f). The Statutory Nuisance Statement [EN0110014/APP/7.13] draws upon the assessment conclusions from ES Volume 1, ES Volume 1, Chapter 12 - Noise and Vibration [EN0110014/APP/6.1.12] , ES Volume 1, Chapter 13 – Air Quality [EN0110014/APP/6.1.13] and ES Volume 1, Chapter 18 – Other Environmental Matters [EN0110014/APP/6.1.18] , together with the measures secured through various management plans.
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)	For the reasons set out in the Statutory Nuisance Statement [EN0110014/APP/7.13] , with the embedded mitigation measures in place, it is considered that the construction, operation and decommissioning phases of the Scheme will not give rise to impacts which would constitute a statutory nuisance. 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.
Air Quality and Emissions		

Relevant Paragraph	Detail	Scheme Compliance
5.2.8	Where the project is likely to have adverse effects on air quality the applicant should undertake an assessment of the impacts of the proposed project as part of the ES.	ES Volume 1, Chapter 13 Air Quality [EN0110014/APP/6.1.13] assesses the likely significant effects of the Scheme on air quality. This includes describing the existing NO ₂ , PM ₁₀ and PM _{2.5} concentrations, potential changes to traffic as a result of the decommissioning phases and the resulting potential effects on human health and ecological receptors.
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.	Following the implementation of mitigation measures detailed within the Outline CEMP [EN0110014/APP/7.1], the Outline CTMP [EN0110014/APP/7.6], the Outline BSMP [EN0110014/APP/7.5], the Outline OEMP [EN0110014/APP/7.2], and the Outline DEMP [EN0110014/APP/7.3], there are no significant effects anticipated from the Scheme on air quality. These measures will be secured through Requirements in the draft DCO [EN0110014/APP/3.1]. A BESS Fire – Emissions to Air Risk Assessment is included in the Outline BSMP [EN0110014/APP/7.5], which considers combustion emissions in the event of a battery fire. Through the implementation of the proposed mitigation secured through the Outline BSMP, it is considered that the potential risk of air quality impacts resulting from a BESS fire will be effectively controlled.
5.2.10	In addition, applicants should consider the Environment Targets (Fine Particulate Matter) (England) Regulations 2023 and associated Defra guidance.	Regard has been had to the Environment Targets (Fine Particulate Matter) (England) Regulations 2023 in ES Volume 1, Chapter 13 Air Quality [EN0110014/APP/6.1.13] .
5.2.11	Defra publishes future national projections of air quality based on estimates of future levels of emissions, traffic, and vehicle fleet. Projections are updated as the evidence base changes and the applicant should ensure these are current at the point of an application. The applicant's assessment should be consistent with this but may include more detailed modelling and evaluation to demonstrate local and national impacts. If an applicant believes they have robust additional supporting evidence, to the extent they could affect the conclusions of the assessment, they should include this in their representations to the Examining Authority along with the source.	Defra's future projections of background concentrations have been used to inform ES Volume 1, Chapter 13 Air Quality [EN0110014/APP/6.1.13] . Defra's future projects of emissions, traffic and vehicle fleet have not been used as road traffic emissions were screened out of the assessment.
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	ES Volume 1, Chapter 13 - Air Quality [EN0110014/APP/6.1.13] assesses the likely significant effects of the Scheme on air quality and concludes that, with embedded mitigation, no likely significant effects are identified in relation to air quality.

Relevant Paragraph	Detail	Scheme Compliance
	appropriate mitigation measures to ensure that those statutory limits, objectives or targets are not breached.	A BESS Fire – Emissions to Air Risk Assessment is included in the Outline BSMP [EN0110014/APP/7.5] , which considers combustion emissions in the event of a battery fire. Through the implementation of the proposed mitigation secured through the Outline BSMP, it is considered that the potential risk of air quality impacts resulting from a BESS fire will be effectively controlled.
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.	Embedded measures for air quality are secured through the Outline CEMP [EN0110014/APP/7.1] , the Outline CTMP [EN0110014/APP/7.6] , the Outline BSMP [EN0110014/APP/7.5] , the Outline OEMP [EN0110014/APP/7.2] , and the Outline DEMP [EN0110014/APP/7.3] .
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.	The Outline CTMP [EN0110014/APP/7.6] includes a Framework Construction Worker Travel Plan to promote sustainable transport for workers during the Scheme's construction phase. Similarly, as set out in the Outline OTMP [EN0110014/APP/7.7] , a Replacement Activities Worker Travel Plan will be enacted before replacement activities begin (this will be secured through the detailed OTMP). Its purpose is to encourage workers to use sustainable travel options whenever practicable.
5.2.15	Many activities involving air emissions are subject to pollution control. The considerations set out in Section 4.12 on the interface between planning and pollution control therefore apply. The Secretary of State must also consider duties under other legislation including duties under the Environment Act 2021 in relation to environmental targets and have regard to policies set out in the government's Environmental Improvement Plan.	ES Volume 1, Chapter 13 - Air Quality [EN0110014/APP/6.1.13] concludes that no significant effects are anticipated on air quality as a result of the Scheme and therefore will not lead to a deterioration in air quality.
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.	Embedded measures for air quality are secured through the Outline CEMP [EN0110014/APP/7.1] , the Outline CTMP [EN0110014/APP/7.6] , the Outline BSMP [EN0110014/APP/7.5] , the Outline OEMP [EN0110014/APP/7.2] , and the Outline DEMP [EN0110014/APP/7.3] .
5.2.17	The Secretary of State should give air quality considerations substantial weight where a project is proposed near a sensitive receptor site, such as an education or healthcare facility, residential use or a sensitive or protected habitat.	ES Volume 1, Chapter 13 - Air Quality [EN0110014/APP/6.1.13] provides an explanation of the Study Area and the scope for the air quality assessment.

Relevant Paragraph	Detail	Scheme Compliance
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.	The road network considered in the assessment of construction road traffic emission impacts on sensitive human and ecological receptor locations is presented in ES Volume 2, Figures 11.14 - 11.17 Traffic Survey Locations [EN0110014/APP/6.2.11.14 - 11.17]. For the assessment of construction road traffic emissions on sensitive human receptors, the screening criteria outlined in ES Volume 3, Appendix 13.2 - EPUK & IAQM Screening Criteria [EN0110014/APP/6.3.13.2] has been applied to all roads that traffic data have been provided for. ES Volume 1, Chapter 13 - Air Quality [EN0110014/APP/6.1.13] concludes following the implementation of embedded mitigation within the various management plans submitted with the DCO Application, significant residual effects have not been identified in relation to air quality during the construction and decommissioning phases. 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. effects anticipated on air quality as a result of the Scheme.
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.	
Greenhouse Gas Emissions		
5.3.4	All proposals for energy infrastructure projects should include a GHG assessment as part of their ES (See Section 4.3). This should include: • A whole life GHG assessment showing construction, operational and decommissioning GHG impacts, including impacts from change of land use. • An explanation of the steps that have been taken to drive down the climate change impacts at each of those stages. • Measurement of embodied GHG impact from the construction stage. • How reduction in energy demand and consumption during operation has been prioritised in comparison with other measures. • How operational emissions have been reduced as much as possible through the application of BAT for that type of technology. • Calculation of operational energy consumption and associated carbon emissions.	ES Volume 1, Chapter 6 – Climate Change [EN0110014/APP/6.1.6] includes an assessment of Lifecycle GHG, considering embodied carbon and GHG emissions from the Scheme, together with climate change resilience and in-combination effects from other environmental disciplines contributing to climate change. This assessment concludes that the construction and decommissioning phases of the Scheme will not result in significant residual effects on the global climate from GHG emissions. During the operation of the Scheme there would be a significant beneficial residual effect on the global climate due to the clean energy it produces, thereby providing a net reduction in GHG emissions compared to a scenario without the Scheme where energy may be produced by other more highly emitting methods. The GHG assessment concludes that the predicted GHG emissions for the construction phase is 347,678 tCO₂e, with the greatest contribution from the BESS and Solar PV Panel products and associated embodied carbon. Annual emissions from the construction of the Scheme do not contribute to equal to or more than 0.05% of the 5th UK carbon budget and less than 1% each year of the total electricity supply sector budget. GHG emissions from the construction of the Scheme are considered to have a minor adverse effect on the climate, which is considered not significant.

Relevant Paragraph	Detail	Scheme Compliance
	- Whether and how any residual GHG emissions will be (voluntarily) offset or removed using a recognised framework. - Where there are residual emissions, the level of emissions and the impact of those on national and international efforts to limit climate change, both alone and where relevant in combination with other developments at a regional or national level, or sector level, if sectoral targets are developed.	For the operation phase of the Scheme, GHG emissions will be generated through activities such as the transportation of operational workers, water consumption, energy usage, and replacement and maintenance activities, including associated replacement activities. GHG emissions during operation is expected to be 1,104,918 tCO₂e and the total energy generated by the Scheme would be around 36.33 TWh over the 60 years of the Scheme. The Scheme will facilitate future uptake of low emissions technology outside of traditional electricity uses. Accounting for the estimated construction, operation and decommissioning phase emissions, the Scheme's total carbon intensity value is 39.66 gCO₂e/kWh. The GHG Reduction Strategy is included within the Outline CEMP [EN0110014/APP/7.1]. The Outline OEMP [EN0110014/APP/7.2] details mitigation to minimise climate change effects The embedded measures are documented within the Outline CEMP [EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2] and Outline DEMP [EN0110014/APP/7.3] and secured via corresponding requirements of the draft DCO [EN0110014/APP/3.1]. Where applicable, the construction embedded mitigation measures as outlined in the Outline CEMP [EN0110014/APP/7.1] will be put in place during the operational phase to optimise efficiency and will be outlined in the detailed OEMP, to be prepared substantially in accordance with the Outline OEMP. These include but not limited to: - Using equipment's cooling systems where necessary/adapting working practices and equipment based on weather conditions; - Regular planned maintenance of the Scheme will be conducted to optimise efficiency of the infrastructure; - Increasing recyclability by segregating waste to be re used and recycled where reasonably practicable; - Encouraging the use of lower carbon modes of transport; and - Switching off vehicles and plant when not in use and ensuring vehicles conform to current UK emissions standards.
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 assessment, which considers the embodied carbon GHG emissions at each phase of the Scheme, is provided in ES Volume 1, Chapter 6 - Climate Change [EN0110014/APP/6.1.6] . ES Volume 1, Chapter 6 - Climate Change [EN0110014/APP/6.1.6] also outlines the embedded mitigation measures for climate change impacts for each phase of the Scheme.

Relevant Paragraph	Detail	Scheme Compliance
5.3.6	Applicants should look for opportunities within the proposed development to embed nature-based or technological solutions to mitigate or offset the emissions of construction and decommissioning.	The GHG Reduction Strategy is included within the Outline CEMP [EN0110014/APP/7.1] . The Outline OEMP [EN0110014/APP/7.2] details mitigation to minimise climate change effects. The Outline CEMP [EN0110014/APP/7.1] , Outline OEMP [EN0110014/APP/7.2] , and Outline DEMP [EN0110014/APP/7.3] and secured via corresponding Requirements of the draft DCO [EN0110014/APP/3.1] .
5.3.7	Steps taken to minimise and offset emissions should be set out in a GHG Reduction Strategy, secured under the Development Consent Order. The GHG Reduction Strategy should consider the creation and preservation of carbon stores and sinks including through woodland creation, hedgerow creation and restoration, peatland restoration and through other natural habitats.	The Scheme also includes nature-based solutions as set out in the Outline LEMP [EN0110014/APP/7.4] . 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.
5.3.8	The Secretary of State must be satisfied that the applicant has as far as possible assessed the GHG emissions of all stages of the development.	The Applicant has assessed the potential GHG emissions and effects throughout all phases of the Scheme in ES Volume 1, Chapter 6 - Climate Change [EN0110014/APP/6.1.6] . The embedded measures are documented within the Outline CEMP [EN0110014/APP/7.1] , Outline OEMP [EN0110014/APP/7.2] , and Outline DEMP [EN0110014/APP/7.3] and secured via corresponding requirements of the draft DCO [EN0110014/APP/3.1] .
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.	With embedded measures in place, the Scheme is anticipated to have minor adverse effects on the climate during its construction and decommissioning phases due to associated GHG emissions. These impacts are minimised through embedded mitigation measures. Overall, the Scheme is expected to deliver significant residual benefits across its lifecycle by generating clean energy and achieving a net reduction in GHG emissions compared to a scenario compared without the Scheme.
5.3.10	The Secretary of State should give appropriate weight to projects that embed nature-based or technological processes to mitigate or offset the emissions of construction and decommissioning within the proposed development. However, in light of the vital role energy infrastructure plays in the process of economy wide decarbonisation, the Secretary of State must accept that there are likely to be some residual emissions from construction and decommissioning of energy infrastructure.	The Scheme achieves emissions mitigation that goes substantially beyond the reduction trajectory, or substantially beyond existing and emerging policy compatible with that trajectory. The Scheme is playing a part in achieving the rate of transition required by nationally set policy commitments. The Scheme avoids GHG emissions in the without-project baseline.
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	The Applicant has assessed the potential GHG emissions from the operational phase of the Scheme in ES Volume 1, Chapter 6 - Climate Change [EN0110014/APP/6.1.6] . This concludes a significant residual beneficial effect on global climate across the Scheme's operational phase.

Relevant Paragraph	Detail	Scheme Compliance
	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.	The embedded measures are documented within the Outline CEMP [EN0110014/APP/7.1] , Outline OEMP [EN0110014/APP/7.2] , and Outline DEMP [EN0110014/APP/7.3] and secured via corresponding requirements of the draft DCO [EN0110014/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.	ES Volume 1, Chapter 6 - Climate Change [EN0110014/APP/6.1.6] confirmed the on average, the operational phase of the Scheme accounts for 0.53% of the 2028-2030 Electricity Carbon budgets.
Biodiversity and Geological Conservation		
5.4.4	The highest level of biodiversity protection is afforded to sites identified through international conventions. The Habitats Regulations set out sites for which an HRA will assess the implications of a plan or project, including Special Areas of Conservation and Special Protection Areas.	The Shadow Habitats Regulation Assessment [EN0110014/APP/7.25] assesses the implications of the Scheme on sites set out in the Habitats Regulation including Special Areas of Conservation (SAC), Ramsar sites and Special Protection Areas (SPA). This assessment found no mechanism for impacts arising at the identified European Sites via potential pathways. As such, no likely significant effects have been identified on the integrity of relevant protected sites, either alone or in-combination with any other plan or project. This identified no likely significant effects on Norfolk Valley Fens SAC, The Broads SAC, Broadland Special Protection Area SPA and Broadland Ramsar that are within 10km of the Order Limits. The Shadow Habitats Regulations Assessment does not proceed to Appropriate Assessment stage.
5.4.5	As a matter of policy, the following should be given the same protection as sites covered by the Habitats Regulations and an HRA will also be required: (a) Potential Special Protection Areas and possible Special Areas of Conservation; (b) Listed or proposed Ramsar sites; and (c) Sites identified, or required, as compensatory measures for adverse effects Special Protection Areas, Special Areas of Conservation, and any of the other sites covered by this paragraph.	
5.4.8	Development on land within or outside a SSSI, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits (including need) of the development in the location proposed clearly outweigh both its likely impact on the features of the site that	There are no national statutory ecological designations within the Order Limits, however, 10 SSSI are located within 5km of the Order Limits. ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] sets out an assessment of the likely effects of the Scheme on SSSI. With embedded measures in place, concludes, no significant residual adverse effects on SSSI.

Relevant Paragraph	Detail	Scheme Compliance
	make it of special scientific interest, and any broader impacts on the national network of SSSIs.	
5.4.13	Sites of regional and local biodiversity and geological interest, which include Regionally Important Geological Sites, Local Nature Reserves and Local Wildlife Sites, are areas of substantive nature conservation value and make an important contribution to ecological networks and nature's recovery. They can also provide wider benefits including public access (where agreed), climate mitigation and helping to tackle air pollution.	There are no local statutory ecological designations within the Order Limits although three Local Nature Reserves are located within 5km of the Order Limits. There are also no Regionally Important Geological Sites within the Order Limits. ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] concludes that with embedded mitigation in place, no significant residual adverse effects on Local Nature Reserves.
5.4.16	Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Keepers of Time, the government's policy for ancient and native trees and woodlands in England sets out the government's commitment to maintain and enhance the existing area of ancient woodland, maintain and enhance the existing resource of known ancient and veteran trees, excluding natural losses from disease and death, and to increase the percentage of ancient woodland in active management. Ancient and veteran trees found outside ancient woodland are also particularly valuable. Other types of irreplaceable habitats include blanket bog, limestone pavement, coastal sand dunes, spartina salt marsh swards, mediterranean saltmarsh scrub, and lowland fen.	The relevant irreplaceable habitats relevant to the Scheme are Ancient Woodland, ancient/veteran trees and lowland fen habitat. Lowland fen habitats and ancient/veteran trees have been identified within the Order Limits and Ancient Woodland is located adjacent to the Order Limits. No irreplaceable habitat (Ancient Woodland, veteran trees and lowland fen) is proposed to be removed as a result of the Scheme. ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] concludes with embedded measures in place, no significant residual adverse effects have been identified in relation to Ancient Woodland, ancient/veteran trees and lowland fen habitat.
5.4.18	Where the development is subject to EIA, the applicant should ensure that the ES clearly sets out any effects on internationally, nationally, and locally designated sites of ecological or geological conservation importance (including those outside England), on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats.	ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] provides an assessment of the likely significant effects of the Scheme on 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.
5.4.20	The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests.	The Design Approach Document [EN0110014/APP/7.18] explains how good design has been embedded into the Scheme, including project level design principles and design offset buffers. These include for example, to retain and enhance existing vegetation, where possible,

Relevant Paragraph	Detail	Scheme Compliance
5.4.21	Applicants should consider wider ecosystem services and benefits of natural capital when designing enhancement measures.	restore features such hedgerows and ghost ponds and strengthen habitat corridors and connectivity. The Scheme's design evolution has sought to avoid relevant Important Ecological Features, such as hedgerows, watercourses and woodlands, as far as practicable.
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.	ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] confirms the mitigation hierarchy applied during the design of the Scheme follows an approach where there is potential for impacts on relevant Important Ecological Features. The Outline LEMP [EN0110014/APP/7.4] describes habitat creation, management and monitoring prescriptions to mitigate and enhance biodiversity. Enhancement includes the provision of varied mosaic of habitat creation such as flower rich pollinator, tussocky, neutral and modified grassland and restoration of ghost ponds, where practicable, increasing habitat connectivity. A Green Infrastructure Strategy included in the Outline LEMP [EN0110014/APP/7.4] has been developed. This shows extensive planting enhancements proposed in the Sites, together with permissive paths and community accessible space which provides the opportunity for recreational use. With the embedded mitigation in place, ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] the assessment concludes for habitats such as hedgerow and tree lines, woodland, rivers, ponds, grassland and ditches, owing to the cessation of intensive arable farming, enhancements to the quality and extent of habitats, significant residual beneficial are anticipated. The Scheme will deliver, as a minimum, 10% BNG, as set out in the Biodiversity Net Gain Report [EN0110014/APP/7.23]. The ecological mitigation and enhancement within the Scheme will deliver a potential net gain of 37.42% for habitats, a net gain of 31.35% for hedgerows and 16.08% for watercourses.
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.	As set out in ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] the assessment has considered the effects of the Scheme on breeding birds, freshwater fish and terrestrial mammals. The assessment found no significant adverse residual effects on these species during construction and decommissioning phases, although significant beneficial effects have been identified on breeding birds, skylark, badger, water vole and otter during the operation of the Scheme. The Shadow Habitats Regulation Assessment Report [EN0110014/APP/7.25] concludes no likely significant effects have been identified on the integrity of relevant protected sites, either alone or in-combination with any other plan or project. This identified no likely significant

Relevant Paragraph	Detail	Scheme Compliance
		effects on Norfolk Valley Fens SAC, The Broads SAC, Broadland Special Protection Area SPA and Broadland Ramsar that are within 10km of the Order Limits.
5.4.26	The applicant should seek the advice of the appropriate SNCB and provide the Secretary of State with such information as the Secretary of State may reasonably require, to determine whether an HRA Appropriate Assessment is required. Applicants can request and agree 'Evidence Plans' with SNCBs, which is a way to record upfront the information the applicant needs to supply with its application, so that the HRA can be efficiently carried out. If an AA is required, the applicant must provide the Secretary of State with such information as may reasonably be required to enable the Secretary of State to conduct the AA. This should include information on any mitigation measures that are proposed to minimise or avoid likely significant effects.	The Shadow Habitats Regulation Assessment Report [EN0110014/APP/7.25] concludes no likely significant effects have been identified on the integrity of relevant protected sites, either alone or in-combination with any other plan or project. This identified no likely significant effects on Norfolk Valley Fens SAC, The Broads SAC, Broadland Special Protection Area SPA and Broadland Ramsar that are within 10km of the Order Limits. The Shadow Habitats Regulations Assessment does not proceed to Appropriate Assessment stage.
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.	
5.4.28	If the SNCB gives such an indication at a later stage in the development consent process, the applicant must provide this information as soon as is reasonably possible and before the close of the examination. This information must include assessment of alternative solutions, a case for IROPI and appropriate environmental compensation	
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	

Relevant Paragraph	Detail	Scheme Compliance
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 Regulation Assessment Report [EN0110014/APP/7.25] concludes no likely significant effects have been identified on the integrity of relevant protected sites, either alone or in-combination with any other plan or project. This identified no likely significant effects on Norfolk Valley Fens SAC, The Broads SAC, Broadland Special Protection Area SPA and Broadland Ramsar that are within 10km of the Order Limits. Therefore, there are no environmental compensation requirements to be considered.
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 LPA 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.	The applicant has consulted with both Natural England (and South Norfolk Council) in respect of protected species and protected species sites. Outcomes are presented in ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] and the Shadow Habitats Regulation Assessment Report [EN0110014/APP/7.25] submitted with the DCO Application. The latter 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.
5.4.33	Applicants should include measures to mitigate fully the direct and indirect effects of development on ancient woodland, ancient and veteran trees or other irreplaceable habitats during both construction and operational phases.	The design offset buffers for the Scheme are set out in the Design Principles, Parameters and Commitments [EN011014/APP /7.18] to retain and protect key landscape and ecological features. This includes a minimum of 30m buffer from Ancient Woodland and 15x width of tree stem diameter or 5m from the edge of the tree's canopy, whichever is greater, for ancient/veteran trees. Further 'Avoidance Areas' have been identified, which are secured in the Outline CEMP [EN0110014/APP /7.2], for trenchless crossings during the construction phase. These Avoidance Areas includes the lowland fen identified in the Cable Route Corridor. Embedded measures incorporated with the Outline CEMP [EN0110014/APP/7.2] that include management measures to protect Ancient Woodland, ancient/veteran trees and lowland fen during the construction phase. Such measures include: • Mitigation measures to reduce dust / sediment effects on adjacent woodland (including Ancient Woodland); • Mitigation to avoid spillages entering watercourses and effecting ecology; • Set backs from construction works and watercourses; • Water contamination within locations which are at risk (washdown areas, stockpiles for example) to feature separate drainage.
5.4.34	Applicants should consider any reasonable opportunities to maximise the restoration, creation, and enhancement of wider biodiversity, and the protection and restoration of the ability of habitats to store or sequester carbon as set out under Section 4.6.	As secured in the Outline LEMP [EN0110014/APP/7.4] , new habitats will be provided as part of the Scheme, with the aim of enhancing landscape features and biodiversity. Enhancement includes the provision of varied mosaic of habitat creation such as flower rich pollinator, tussocky, neutral and modified grassland and restoration of ghost ponds, where practicable, increasing habitat connectivity. Local conservation priorities in relation to the Norfolk Wildlife

Relevant Paragraph	Detail	Scheme Compliance
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.	Trust South Norfolk Claylands and initiatives of the Norfolk Local Nature Recovery Strategy have been considered within the Outline LEMP [EN0110014/APP/7.4]. The Outline LEMP [EN0110014/APP/7.4] also includes the provision of habitat boxes for birds, bats and hedgehogs, together with the provision of skylark plots within retained agricultural land The Scheme will deliver, as a minimum, 10% BNG, as set out in the Biodiversity Net Gain Report [EN0110014/APP/7.23]. The ecological mitigation and enhancement within the Scheme will deliver a potential net gain of 37.42% for habitats, a net gain of 31.35% for hedgerows and 16.08% for watercourses.
5.4.36	Applicants should include appropriate avoidance, mitigation, compensation and enhancement measures as an integral part of the proposed development. In particular, the applicant should demonstrate that: - during construction, they will seek to ensure that activities will be confined to the minimum areas required for the works; - the timing of construction has been planned to avoid or limit disturbance; - during construction and operation best practice will be followed to ensure that risk of disturbance or damage to species or habitats is minimised, including as a consequence of transport access arrangements; - habitats will, where practicable, be restored after construction works have finished; - opportunities will be taken to enhance existing habitats rather than replace them, and where practicable, create new habitats of value within the site landscaping proposals. Where habitat creation is required as mitigation, compensation, or enhancement, the location and quality will be of key importance. In this regard habitat creation should be focused on areas where the most ecological and ecosystems benefits can be realised; and - mitigations required as a result of legal protection of habitats or species will be complied with.	ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] confirms the mitigation hierarchy applied during the design of the Scheme follows an approach where there is potential for impacts on relevant Important Ecological Features. The Outline CEMP [EN0110014/APP/7.1] and the Outline CTMP [EN0110014/APP/7.6] secures 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. These include for example, pollution prevention measures, control of dust and lighting and adherence to 'BS5837:2012 Trees in relation to design, demolition and construction'. The Outline LEMP [EN0110014/APP/7.4] describes habitat creation, management and monitoring prescriptions to mitigate and enhance biodiversity and the Outline OEMP [EN0110014/APP/7.2] sets out management measures to minimise impacts during the operational phase. It is acknowledged that hedgerow removal will be required. Where hedgerow removal is required, the length of removal would be minimised, as secured through the Outline LEMP [EN0110014/APP/7.4].

Relevant Paragraph	Detail	Scheme Compliance
5.4.37	Applicants should produce and implement a Biodiversity Management Strategy as part of their development proposals. This could include provision for biodiversity awareness training to employees and contractors so as to avoid unnecessary adverse impacts on biodiversity during the construction and operation stages.	The Green Infrastructure Strategy for the Scheme is shown in the Outline LEMP [EN0110014/APP/7.4] . In addition, the Outline CEMP [EN0110014/APP/7.1] includes the requirement for contractors to be briefed as to the possible presence of protected and notable faunal species.
5.4.40	The government's Environment 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.	As secured in the Outline LEMP [EN0110014/APP/7.4] , new habitats will be provided as part of the Scheme, with the aim of enhancing landscape features and biodiversity. Enhancement includes the provision of varied mosaic of habitat creation such as flower rich pollinator, tussocky, neutral and modified grassland and restoration of ghost ponds, where practicable, increasing habitat connectivity. Local conservation priorities in relation to the Norfolk Wildlife Trust South Norfolk Claylands and initiatives of the Norfolk Local Nature Recovery Strategy have been considered within the Outline LEMP [EN0110014/APP/7.4] .
5.4.42	The benefits of nationally significant low carbon energy infrastructure development may include benefits for biodiversity and geological conservation interests and these benefits may outweigh harm to these interests. The Secretary of State may take account of any such net benefit in cases where it can be demonstrated.	The Scheme will deliver, as a minimum, 10% BNG, as set out in the Biodiversity Net Gain Report [EN0110014/APP/7.23] . The ecological mitigation and enhancement within the Scheme will deliver a potential net gain of 37.42% for habitats, a net gain of 31.35% for hedgerows and 16.08% for watercourses.
5.4.43	As a general principle, and subject to the specific policies below, development should, in line with the mitigation hierarchy, aim to avoid significant harm to biodiversity and geological conservation interests, including through consideration of reasonable alternatives (as set out in Section 4.3 above). Where significant harm cannot be avoided, impacts should be mitigated and as a last resort, appropriate compensation measures should be sought.	ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] confirms the mitigation hierarchy applied during the design of the Scheme follows an approach where there is potential for impacts on relevant Important Ecological Features. ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] found no significant residual adverse effects on habitats or species with mitigation in place. As a result of embedded measures, significant residual beneficial effects of the Scheme have been identified in relation to priority and non-priority habitats, including hedgerow and tree lines, woodland, rivers, ponds, grassland, ditches and scrub during the operation phase. Further, significant residual beneficial effects have been identified on amphibians, breeding birds, badgers and riparian mammals during the operation of the Scheme. Mitigation measures are set out in the Outline CEMP [EN0110014/APP/7.1] , Outline OEMP [EN0110014/APP/7.2] , Outline DEMP [EN0110014/APP/7.3] , and the Outline LEMP [EN0110014/APP/7.4] . These will be secured through Requirements in Schedule 2 to the draft DCO [EN0110014/APP/3.1] .
5.4.44	If significant harm to biodiversity resulting from a development cannot be avoided (for example through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then the Secretary of State will give significant weight to any residual harm.	
5.4.45	The Secretary of State should consider what appropriate requirements should be attached to any consent and/or in any	For BNG, monitoring is detailed within and secured by the Outline LEMP [EN0110014/APP/7.4] . After 30 years, monitoring would be reviewed to ensure habitat

Relevant Paragraph	Detail	Scheme Compliance
	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.	management prescriptions for the remainder of the operational (including maintenance) phase are appropriate.
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.	The Design Approach Document [EN0110014/APP/7.17] 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 to guide decision making and embed good design outcomes to the Scheme, together with design offset buffers.
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.	The Works Plan [EN0110014/APP/2.3] and the Design Principles, Parameters and Commitments [EN0110014/APP/7.18] secure the design of the Scheme through the draft DCO [EN0110014/APP/3.1] . The Scheme will deliver, as a minimum, 10% BNG, as set out in the Biodiversity Net Gain Report [EN0110014/APP/7.23] . The ecological mitigation and enhancement within the Scheme are predicted to provide a net gain of 37.43% for habitats, 31.35% for hedgerows and 16.08% for watercourses. A Requirement in the draft DCO [EN0110014/APP/3.1] commits to delivering a minimum net gain of 10% for habitats, a net gain of 10% for hedgerow and tree lines and 10% for watercourses.
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 Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] has been produced taking due consideration for the appropriate weighting for designated sites of international, national and local importance; protected species; habitats and other species of principal importance for the conservation of biodiversity. With the sensitivity weighting established, ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] presents an assessment which concludes no significant adverse residual effects with mitigation in place.
5.4.51	The Secretary of State must consider whether the project is likely to have a significant effect on a protected site which is part of the National Site Network (a habitat site), a protected marine site, or on any site to which the same protection is applied as a matter of policy, either alone or in combination with other plans or projects.	The Shadow Habitats Regulation Assessment Report [EN0110014/APP/7.25] concludes no likely significant effects have been identified on the integrity of relevant protected sites, either alone or in-combination with any other plan or project. This identified no likely significant effects on Norfolk Valley Fens SAC, The Broads SAC, Broadland Special Protection Area SPA and Broadland Ramsar that are within 10km of the Order Limits.

Relevant Paragraph	Detail	Scheme Compliance
5.4.52	The Secretary of State should use requirements and/or planning obligations to mitigate the harmful aspects of the development and, where possible, to ensure the conservation and enhancement of the site's biodiversity or geological interest.	Details of how the Scheme has sought to avoid harm to biodiversity and incorporate opportunities to conserve and enhance biodiversity are set out in ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8]. There are no national statutory ecological designations within the Order Limits, however, 10 SSSI are located within 5km of the Order Limits. ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] sets out an assessment of the likely effects of the Scheme on SSSI. With embedded measures in place, concludes, no significant residual adverse effects on SSSI.
5.4.54	The Secretary of State should give due consideration to regional or local designations. However, given the need for new nationally significant infrastructure, these designations should not be used in themselves to refuse development consent.	There are no local statutory ecological designations within the Order Limits although three Local Nature Reserves are located within 5km of the Order Limits. There are also no Regionally Important Geological Sites within the Order Limits. ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] concludes that with embedded mitigation in place, no significant residual adverse effects on Local Nature Reserves
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.	No irreplaceable habitat (Ancient Woodland, veteran trees and lowland fen) is proposed to be removed as a result of the Scheme with avoidance measures proposed including offset buffers and Avoidance Areas. With adherence to embedded measures in the Outline CEMP [EN0110014/APP/7.1] , Outline OEMP [EN0110014/APP/7.2] and Outline LEMP [EN0110014/APP/7.4] , with the latter to make sure the long-term protection and health of veteran trees, ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] concludes no significant residual effects on irreplaceable habitats.
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 Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] identifies Important Ecological Features and Protected Species within the Order Limits. With adherence to embedded measures in the Outline CEMP [EN0110014/APP/7.1] and Outline OEMP [EN0110014/APP/7.2] , no significant adverse effects have been identified during all phases of the Scheme. The assessment concludes, however, significant beneficial effects during the operational phase on specific habitats and some protected species with the implementation of the Outline LEMP [EN0110014/APP/7.4] .
5.4.57	The Secretary of State should refuse consent where harm to a protected species and relevant habitat would result, unless there is an overriding public interest and the other relevant legal tests are met. In this context the Secretary of State should give substantial weight to any such harm to the detriment of biodiversity features of national or regional importance or the climate resilience and the capacity of habitats to store carbon, which they consider may result from a proposed development.	For legislative compliance and to avoid impacts upon protected species embedded mitigation measures are detailed within the Outline Protected Species Management Strategy [EN0110014/ APP/8.10] .
Civil and Military Aviation and Defence Interests		

Relevant Paragraph	Detail	Scheme Compliance
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).	The Applicant consulted with National Air Traffic Services (NATS) Safeguarding as part of the consultation stages for the Scheme. During the pre-application stage, the Applicant also engaged with Norfolk Gliding Club and Norfolk Gliding Club regarding the operations of Tibbenham Airfield and the flight training organisation Wingtask for the operations of Seething Airfield. Discussions with Wingtask resulted in design changes to the Scheme as reported in the Design Approach Document [EN0110014/APP/7.17] . Further details of consultation are described in the Consultation Report [EN0110014/APP/5.1] and associated appendices.
5.5.40	The applicant should consult the MOD, Met Office, Civil Aviation Authority (CAA), NATS and any aerodrome – licensed or otherwise – likely to be affected by the proposed development in preparing an assessment of the proposal on aviation, meteorological or other defence interests	ES Volume 1, Chapter 18 – Other Environmental Matters [EN0110014/APP/6.1.18] and ES Volume 3, Appendix 18.1 - Glint and Glare Assessment [EN0110014/APP/6.3.18.1] provide an assessment of the likely effects of the Scheme from glint and glare on aerodromes. With embedded and additional mitigation (reorientating fixed panels and limiting the backtracking angle for single-axis tracking panels) in place, the assessment concludes a low impact on aerodromes from glint and glare, which is not considered significant. The High Level Investigative Report [EN0110014/APP/7.27] concludes no significant risks when best practice is followed on Engine Failure After Take-Off (EFATO) and Glider Launch Failure, thermal updrafts, and wind shear and turbulence, upon aviation activity associated with Tibenham Airfield.
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, Instrument Flight Procedures, 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 demonstrable cumulative effects [footnote 172] of the project with other relevant projects in relation to aviation, meteorological and defence.	EFATO was also considered for the operations at Seething Airfield as reported in Potential Impact on Seething Aerodrome Forced Landing Options report [EN0110014/APP/7.28] . In response to the findings of this assessment, Solar PV Panels were removed in the eastern part of Sub-Site 10B closest to Seething Airfield as embedded mitigation within the design of the Scheme. This would make sure that aircraft suffering an EFATO on departure from runway 24 at Seething Airfield would continue to have forced landing options available.
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 designed in such a way	A Green Infrastructure Strategy , as part of the Outline OEMP [EN0110014/APP/7.2] , has been developed. Extensive planting enhancements are proposed within the Scheme, however, the managed arable land, grassland and tree planting would be dispersed across the Sites. Whilst it is intended to restore ghost ponds, no large wetland areas would be created where birds may congregate and then take flight together which could cause an issue for aircraft. The risk of flocking birds to cause potential issues for aircraft is considered minimal. Considering the vertical separation distance between the Scheme and the closest circuit performed at Tibenham Airfield, no significant turbulence and wind shear impacts are predicted. Further, considering the weak nature of thermals as a result of Solar PV Panels, and

Relevant Paragraph	Detail	Scheme Compliance
	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.	the expected vertical separation between pilots during circuits and the height of Solar PV Panels, the Scheme is not judged to cause a significant impact as a result of thermal updrafts.
5.5.43	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.	During the pre-application stage, the Applicant also engaged with Norfolk Gliding Club and Norfolk Gliding Club regarding the operations of Tibbenham Airfield and the flight training organisation Wingtask for the operations of Seething Airfield. Discussions with Wingtask resulted in design changes to the Scheme as reported in the Design Approach Document [EN0110014/APP/7.17].
5.5.44	The applicant should include appropriate mitigation measures as an integral part of the proposed development.	As described in the responses, as described above, Solar PV Panels have been removed from the Scheme in response to discussions and an assessment on Seething Airfield. Further measures include reorientating fixed panels and limiting the backtracking angle for single-axis tracking panels. ES Volume 1, Chapter 18 – Other Environmental Matters [EN0110014/APP/6.1.18] concludes the Scheme will result in no significant residual glint and glare effects either in isolation or in combination with cumulative schemes.
5.5.51	The Secretary of State should be satisfied that the effects on meteorological radars, civil and military aerodromes, aviation technical sites and other defence assets or operations have been addressed by the applicant and that any necessary assessment of the proposal on aviation, NSWWS or defence interests has been carried out.	The High Level Investigative Report [EN0110014/APP/7.27], Potential Impact on Seething Aerodrome Forced Landing Options report [EN0110014/APP/7.28] and ES Volume 1, Chapter 18 – Other Environmental Matters [EN0110014/APP/6.1.18] consider the effects on the surrounding unlicensed aerodromes.
5.5.52	In particular, the Secretary of State should be satisfied that the proposal has been designed, where possible, to minimise adverse impacts on the operation and safety of aerodromes	With embedded and additional mitigation (reorientating fixed panels and limiting the backtracking angle for single-axis tracking panels) in place, ES Volume 1, Chapter 18 – Other

Relevant Paragraph	Detail	Scheme Compliance
	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.	Environmental Matters [EN0110014/APP/6.1.18] concludes a low impact on aerodromes from glint and glare, which is not considered significant. The High Level Investigative Report [EN0110014/APP/7.27] concludes no significant risks when best practice is followed on EFATO and Glider Launch Failure, thermal updrafts, and wind shear and turbulence, upon aviation activity associated with Tibenham Airfield. EFATO was also considered for the operations at Seething Airfield as reported in Potential Impact on Seething Aerodrome Forced Landing Options report [EN0110014/APP/7.28]. In response to the findings of this assessment, Solar PV Panels were removed in the eastern part of Sub-Site 10B closest to Seething Airfield as embedded mitigation within the design of the Scheme. This would make sure that aircraft suffering an EFATO on departure from runway 24 at Seething Airfield would continue to have forced landing options available.
Dust, Odour, Artificial Light, Smoke, Steam, and Insect Infestation		
5.7.5	The applicant should assess the potential for insect infestation and emissions of odour, dust, steam, smoke, and artificial light to have a detrimental impact on amenity, as part of the ES.	The air quality effects are assessed in ES Volume 1, Chapter 13 - Air Quality [EN0110014/APP/6.1.13] which concludes that following the implementation of embedded mitigation measures, there are no significant effects on air quality as a result of the Scheme in relation to human health or ecological receptors.
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	ES Volume 3, Appendix 13.1 - Construction and Decommissioning Dust Risk Assessment [EN0110014/APP/6.3.13.1] provides an assessment that has been used to determine appropriate mitigation measures for inclusion within the Outline CEMP [EN0110014/APP/7.1] and the Outline DEMP [EN0110014/APP/7.3]. A BESS Fire – Emissions to Air Risk Assessment is included in the Outline BSMP [EN0110014/APP/7.5], which considers combustion emissions in the event of a battery fire and mitigation required. A Lighting Strategy within ES Volume 3, Appendix 7.11 - Lighting Strategy [EN0110014/APP/6.3.7.11] defines proportionate measures (in context of the nature of the Scheme) to minimise lighting as far as practicable. These commitments are secured through the Outline CEMP [EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2] and the Outline DEMP [EN0110014/APP/7.3].

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		A Statutory Nuisance Statement [EN0110014/APP/7.13] has been submitted with the DCO Application, as is required under APFP Regulation 5(2)(f). This confirms that 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 Outline CEMP [EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2] and the Outline DEMP [EN0110014/APP/7.3].
5.7.7	The applicant is advised to consult the relevant LPA and, where appropriate, the EA about the scope and methodology of the assessment	ES Volume 1, Chapter 13 - Air Quality [EN0110014/APP/6.1.13] sets out the consultation undertaken with South Norfolk Council with regard to the methodology.
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	ES Volume 3, Appendix 13.1 - Construction and Decommissioning Dust Risk Assessment [EN0110014/APP/6.3.13.1] provides an assessment that has been used to determine appropriate mitigation measures for inclusion within the Outline CEMP [EN0110014/APP/7.1] and the Outline DEMP [EN0110014/APP/7.3]. Measures within these management plans are secured through the DCO Requirements. Such measures secured through the Outline CEMP [EN0110014/APP/7.1] include Stakeholder Communications Plan Dust Management Plan, working practices, operating vehicles and machinery, waste management and sustainable travel. ES Volume 3, Appendix 7.11 - Lighting Strategy [EN0110014/APP/6.3.7.11] defines proportionate measures (in context of the nature of the Scheme) to minimise lighting as far as practicable. These commitments are secured through the Outline CEMP [EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2] and the Outline DEMP [EN0110014/APP/7.3]. Construction and decommissioning activities will be undertaken using best practice measures to minimise emissions, as set out in the Outline CEMP [EN0110014/APP/7.1] and Outline DEMP [EN0110014/APP/7.3].
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.	
5.7.11	A construction management plan may help clarify and secure mitigation.	
5.7.12	The Secretary of State should satisfy itself that: • An assessment of the potential for artificial light, dust, odour, smoke, steam and insect infestation to have a detrimental impact on amenity has been carried out • That all reasonable steps have been taken, and will be taken, to minimise any such detrimental impacts	ES Volume 3, Appendix 13.1 - Construction and Decommissioning Dust Risk Assessment [EN0110014/APP/6.1.13.1] has been produced to determine the level of mitigation required to control dust and particulate matters emission for inclusion in the Outline CEMP [EN0110014/APP/7.1] submitted as part of the DCO Application. ES Volume 3, Appendix 7.11 - Lighting Strategy [EN0110014/APP/6.3.7.11] defines proportionate measures (in context of the nature of the Scheme) to minimise lighting as far as

Relevant Paragraph	Detail	Scheme Compliance
		practicable. These commitments are secured through the Outline CEMP [EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2] and the Outline DEMP [EN0110014/APP/7.3]. Construction and decommissioning activities will be undertaken using best practice measures to minimise emissions, as set out in the Outline CEMP [EN0110014/APP/7.1] and Outline DEMP [EN0110014/APP/7.3]. A Statutory Nuisance Statement [EN0110014/APP/7.13] has been submitted with the DCO Application, as is required under APFP Regulation 5(2)(f). This confirms that the Scheme is not anticipated to cause any effects from insect infestation, steam or odour.
5.7.13	If development consent is granted for a project, the Secretary of State should consider whether there is a justification for all of the authorised project (including any associated development) to be covered by a defence of statutory authority against nuisance claims. If the Secretary of State cannot conclude that this is justified, the Secretary of State should disapply in whole or in part the defence through a provision in the Development Consent Order.	The Statutory Nuisance Statement [EN0110014/APP/7.13] draws upon the assessment conclusions from ES Volume 1, Chapter 12 - Noise and Vibration [EN0110014/APP/6.1.12], ES Volume 1, Chapter 13 – Air Quality [EN0110014/APP/6.1.13] and ES Volume 1, Chapter 18 – Other Environmental Matters [EN0110014/APP/6.1.18], together with the measures secured through various management plans. For the reasons set out in the Statutory Nuisance Statement [EN0110014/APP/7.13], with the embedded mitigation measures in place, it is considered that the construction, operation and decommissioning phases of the Scheme will not give rise to impacts which would constitute a statutory nuisance. The draft DCO [EN0110014/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.
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 [EN0110014/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	The relevant management plans for controlling the potential nuisance effects on dust, smoke and artificial light are: Outline CEMP [EN0110014/APP/7.1];

Relevant Paragraph	Detail	Scheme Compliance
	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.	Outline OEMP [EN0110014/APP/7.2]; Outline DEMP [EN0110014/APP/7.3].
Flood Risk		
5.8.7	Where new energy infrastructure is, exceptionally, necessary in flood risk areas (for example where there are no reasonably available sites in areas at lower risk), policy aims to make it safe for its lifetime without increasing flood risk elsewhere and, where possible, by reducing flood risk overall. It should also be designed and constructed to remain operational in times of flood.	A Sequential Test and Exception Test is presented in the Planning Statement [EN0110014/APP/7.14] . The Sequential Test has been applied during site selection as presented in the Site Selection Assessment [EN0110014/APP/7.20] and a sequential approach applied to the design and layout of the Scheme as described in the Planning Statement [EN0110014/APP/7.14] by directing the most vulnerable aspects of the Scheme to areas of lowest flood risk as far as practicable.
5.8.9	If, following application of the Sequential Test, it is not possible, (taking into account wider sustainable development objectives), for the project to be located in areas of lower flood risk the Exception Test can be applied as defined in Table 2 of the Flood Risk and Coastal Change Guidance. The test provides a method of allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available.	The Applicant has considered flooding in the design of the Scheme to minimise the risk of flooding both to and from the Scheme. The most vulnerable elements of infrastructure, being the National Grid Substation, the BESS and Project Substations (along with the Solar PV Arrays) would be sited in areas of Flood Zone 1, at lower risk of flooding. This is secured through the Works Plan [EN0110014/APP/2.3] . The Scheme components within Flood Zones 2 and 3 would therefore relate to electrical cabling, fencing, access and maintenance tracks, together with landscape and biodiversity mitigation and enhancement measures.
5.8.10	The Exception Test is only appropriate for use where the Sequential Test alone cannot deliver an acceptable site. It would only be appropriate to move onto the Exception Test when the Sequential Test has identified reasonably available, lower risk sites appropriate for the proposed development where, accounting for wider sustainable development objectives, application of relevant policies would provide a clear reason for refusing development in any alternative locations identified. Examples could include alternative site(s) that are subject to national designations such as landscape, heritage and nature conservation designations, for example National Landscapes, SSSIs and World Heritage Sites (WHS) which would not usually be considered appropriate.	For the Exception Test, substantial wider sustainability benefits of the Scheme are set out in the Planning Statement [EN0110014/APP/2.3] , together with the proposed measures that have been incorporated into the Scheme design to ensure that the Scheme is safe from flooding for its lifetime and will not increase the risk of flooding elsewhere. The Applicant has applied both the Sequential and Exception Tests and demonstrated how these have been met.

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5.8.11	Both elements of the Exception Test will have to be satisfied for development to be consented. To pass the Exception Test it should be demonstrated that: - The project would provide wider sustainability benefits to the community that outweigh flood risk; and - The project will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible will reduce flood risk overall.	
5.8.12	Development should be designed to ensure there is no increase in flood risk elsewhere, accounting for the predicted impacts of climate change throughout the lifetime of the development. There should be no net loss of floodplain storage and any deflection or constriction of flood flow routes should be safely managed within the site. Mitigation measures should make as much use as possible of natural flood management techniques.	The Design Approach Document [EN0110014/APP/7.17] includes the adoption of project level design principles to guide decision making and embed good design outcomes in the Scheme. Project level design principles include a commitment that the Scheme is resilient to flooding and does not increase flooding elsewhere. The Design Approach Document [EN0110014/APP/7.17] and as secured in the Design Principles, Parameters and Commitments [EN0110014/APP/7.18] , describes the design offset buffers to watercourses.
5.8.13	A site-specific flood risk assessment should be provided for all energy projects in Flood Zones 2 and 3 in England or Defended Flood Zones 2 and 3 in Wales. In Flood Zone 1 in England or Flood Zone 1 in Wales, an assessment should accompany all proposals involving: - Sites of 1 hectare or more - Land which has been identified by the EA or NRW as having critical drainage problems - Land identified (for example in a local authority strategic flood risk assessment) as being at increased flood risk in future - Land that may be subject to other sources of flooding (for example surface water) - Where the EA or NRW, lead local flood authority, internal drainage board or other body have indicated that there may be drainage problems.	Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1] takes into account flood risk from all sources of flooding, taking into account projected impacts of climate change. This includes outline drainage strategies and appropriate treatment stages before runoff is discharged for the National Grid Substation, BESS and Project Substations. The ground beneath the Solar PV Arrays will be covered by grass and/or wildflower meadow which will be maintained to a suitable height using machinery will slow the rate of contact between rainfall and the soil. Embedded flood risk measures of the Scheme are set out in the Design Principles, Parameters and Commitments [EN0110014/APP/7.18], Outline CEMP [EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2] and the Outline DEMP [EN0110014/APP/7.3]. Design commitments relating to flood risk are also set out in the Design Principles, Parameters and Commitments [EN0110014/APP/7.18]. ES Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1] demonstrates that the Scheme is safe and will not detrimentally impact on flood risk within the Order Limits or elsewhere.
5.8.14	This assessment should identify and assess the risks of all forms of flooding to and from the project and demonstrate how	

Relevant Paragraph	Detail	Scheme Compliance
	these flood risks will be managed, taking climate change into account.	ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9] provides an assessment of the likely significant effects of the Scheme on the water environment including in relation to water quality and water resources. No significant adverse residual effects have been identified.
5.8.15	The minimum requirements for Flood Risk Assessments (FRA) are that they should: • Be proportionate to the risk and appropriate to the scale, nature and location of the project; • Consider the risk of flooding arising from the project in addition to the risk of flooding to the project; • Take the impacts of climate change into account, across a range of climate scenarios, clearly stating the development lifetime over which the assessment has been made; • Be undertaken by competent people, as early as possible in the process of preparing the proposal; • Consider both the potential adverse and beneficial effects of flood risk management infrastructure, including raised defences, flow channels, flood storage areas and other artificial features, together with the consequences of their failure and exceedance; • Consider the vulnerability of those using the site, including arrangements for safe access and escape; • Consider and quantify the different types of flooding (whether from natural and human sources and including joint and cumulative effects) and include information on flood likelihood, speed-of-onset, depth, velocity, hazard and duration; • Identify and secure opportunities to reduce the causes and impacts of flooding overall, making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management; • Consider the effects of a range of flooding events including extreme events on people, property, the natural and historic environment and river and coastal processes; • Include the assessment of the remaining (known as 'residual') risk after risk reduction measures have been	

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	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 - 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	

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	- Explain how the sustainable drainage system been designed to facilitate maintenance and, where relevant, adoption. Set out plans for ensuring an acceptable standard of operation and maintenance throughout the lifetime of the development • Detail those measures that will be included to ensure the development will be safe and remain operational during a flooding event throughout the development's lifetime without increasing flood risk elsewhere; • Identify and secure opportunities to reduce the causes and impacts of flooding overall during the period of construction; and • Be supported by appropriate data and information, including historical information on previous events.	
5.8.17	Development (including construction works) will need to account for any existing watercourses and flood and coastal erosion risk management structures or features, or any land likely to be needed for future structures or features so as to ensure: • Access, clearances and sufficient land are retained to enable their maintenance, repair, operation, and replacement, as necessary • Their standard of protection is not reduced; and • Their condition or structural integrity is not reduced.	
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.	ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9] sets out that the Applicant has consulted with Anglian Water, the Environment Agency and the Lead Local Flood Authority during the pre-application stage. The pre-application consultation undertaken by the Applicant, and how feedback from consultees has informed the Scheme, is reported in the Consultation Report [EN0110014/APP/5.1] and its appendices [EN0110014/APP/5.2-5.13].
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	

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	undertake these steps where they appear necessary but have not yet been addressed.	
5.8.20	If the EA, NRW or another flood risk management authority has reasonable concerns about the proposal on flood risk grounds, the applicant should discuss these concerns with the EA or NRW and take all reasonable steps to agree ways in which the proposal might be amended, or additional information provided, which would satisfy the authority's concerns.	
5.8.21	The Sequential Test ensures that a sequential, risk-based approach is followed to steer new development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account. Where it is not possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites with medium risk areas and then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas.	A Sequential Test and Exception Test is presented in Planning Statement [EN0110014/APP/7.14]. The Sequential Test has been applied during site selection as presented in the Site Selection Assessment [EN0110014/APP/7.20] and a sequential approach applied to the design and layout of the Scheme as described in the Planning Statement [EN0110014/APP/7.14] by directing the most vulnerable aspects of the Scheme to areas of lowest flood risk as far as practicable. The Applicant has considered flooding in the design of the Scheme to minimise the risk of flooding both to and from the Scheme. The most vulnerable elements of infrastructure, being the National Grid Substation, the BESS and Project Substations (along with the Solar PV Arrays) would be sited in areas of Flood Zone 1, at lower risk of flooding. This is secured through the Works Plan [EN0110014/APP/2.3]. The Scheme components within Flood Zones 2 and 3 would therefore relate to electrical cabling, fencing, access and maintenance tracks, together with landscape and biodiversity mitigation and enhancement measures. In doing so, the Sequential Test has been appropriately applied.
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. All projects should apply the Sequential Test to locating development within the site.	
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.	

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		ES Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1] demonstrates that the Scheme is safe and will not detrimentally impact on flood risk within the Order Limits or elsewhere. ES Volume 3, Appendix 9.3 – Water Resources Assessment [EN0110014/APP/6.3.9.1] sets out that water neutrality options have been given priority to reduce the supply requirements. These options include rainwater harvesting, on-site water storage and water tankering (to meet peak demand). Tankering is the preferred method of supply.
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	Embedded flood risk measures of the Scheme are set out in the Design Principles, Parameters and Commitments [EN0110014/APP/7.18], Outline CEMP [EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2] and the Outline DEMP [EN0110014/APP/7.3]. Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1] takes into account flood risk from all sources of flooding, taking into account projected impacts of climate change. This includes outline drainage strategies and appropriate treatment stages before runoff is discharged for the National Grid Substation, BESS and Project Substations. The ground beneath the Solar PV Arrays will be covered by grass and/or wildflower meadow which will be maintained to a suitable height using machinery will slow the rate of contact between rainfall and the soil. The surface water drainage arrangements are indicative at this stage and will be subject to further refinement at the detailed design.
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.	
5.8.27	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,	

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	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.	
5.8.29	The sequential approach should be applied to the layout and design of the project. Vulnerable aspects of the development should be located on parts of the site at lower risk and residual risk of flooding. Applicants should seek opportunities to use open space for multiple purposes such as amenity, wildlife habitat and flood storage uses. Opportunities should be taken to lower flood risk by reducing the built footprint of previously developed sites and using SuDS.	A Sequential Test and Exception Test is presented in Planning Statement [EN0110014/APP/7.14]. The Sequential Test has been applied during site selection as presented in the Site Selection Assessment [EN0110014/APP/7.20] and a sequential approach applied to the design and layout of the Scheme as described in the Planning Statement [EN0110014/APP/7.14] by directing the most vulnerable aspects of the Scheme to areas of lowest flood risk as far as practicable. The Applicant has considered flooding in the design of the Scheme to minimise the risk of flooding both to and from the Scheme. The most vulnerable elements of infrastructure, being the National Grid Substation, the BESS and Project Substations (along with the Solar PV Arrays) would be sited in areas of Flood Zone 1, at lower risk of flooding. This is secured through the Works Plan [EN0110014/APP/2.3]. The Scheme components within Flood Zones 2 and 3 would therefore relate to electrical cabling, fencing, access and maintenance tracks, together with landscape and biodiversity mitigation and enhancement measures. In doing so, the Sequential Test has been appropriately applied. The provision of all year-round grassland/wildflower meadow beneath the Solar PV Arrays will reduce soil erosion, contribute to greater interception/evapotranspiration of rainfall and increase ground roughness across the fields, thereby slowing the rate of runoff across Sites. This would reduce flooding to villages located at the bottom of drainage catchments.
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.	Embedded flood risk measures of the Scheme are set out in the Design Principles, Parameters and Commitments [EN0110014/APP/7.18] , Outline CEMP [EN0110014/APP/7.1] , Outline OEMP [EN0110014/APP/7.2] and the Outline DEMP [EN0110014/APP/7.3] .

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5.8.32	Where development may contribute to a cumulative increase in flood risk elsewhere, the provision of multifunctional sustainable drainage systems, natural flood management and green infrastructure can also make a valuable contribution to mitigating this risk whilst providing wider benefits.	ES Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1] demonstrates that the Scheme is safe and will not detrimentally impact on flood risk within the Order Limits or elsewhere.
5.8.33	The receipt of and response to warnings of floods is an essential element in the management of the residual risk of flooding. Flood Warning and evacuation plans should be in place for those areas at an identified risk of flooding.	As outlined in the Outline CEMP [EN0110014/APP/7.1] , Outline OEMP [EN0110014/APP/7.2] , and the Outline DEMP [EN0110014/APP/7.3] , an Emergency Response Plan/Flood Risk Management Action Plan/Method Statement will be prepared to respond to flood warnings and events.
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.	
5.8.36	In determining an application for development consent, the Secretary of State should be satisfied that where relevant: • The application is supported by an appropriate FRA; • The Sequential Test has been applied and satisfied as part of site selection (subject to the exception set out in paragraph 5.8.22 of this NPS, and any technology specific exceptions set out in other NPSs); • A sequential approach has been applied at the site level to minimise risk by directing the most vulnerable uses to areas of lowest flood risk; • The proposal is in line with any relevant national and local flood risk management strategy; • SuDS (as required in the next paragraph on National Standards) have been used unless there is clear evidence that their use would be inappropriate; • In flood risk areas the project is designed and constructed to remain safe and operational during its lifetime, without	A Sequential Test and Exception Test is presented in Planning Statement [EN0110014/APP/7.14]. The Sequential Test has been applied during site selection as presented in the Site Selection Assessment [EN0110014/APP/7.20] and a sequential approach applied to the design and layout of the Scheme as described in the Planning Statement [EN0110014/APP/7.14] by directing the most vulnerable aspects of the Scheme to areas of lowest flood risk as far as practicable. The Applicant has considered flooding in the design of the Scheme to minimise the risk of flooding both to and from the Scheme. The most vulnerable elements of infrastructure, being the National Grid Substation, the BESS and Project Substations (along with the Solar PV Arrays) would be sited in areas of Flood Zone 1, at lower risk of flooding. This is secured through the Works Plan [EN0110014/APP/2.3]. The Scheme components within Flood Zones 2 and 3 would therefore relate to electrical cabling, fencing, access and maintenance tracks, together with landscape and biodiversity mitigation and enhancement measures.

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	increasing flood risk elsewhere (subject to the exceptions set out in paragraph 5.8.22) - The project includes safe access and escape routes where required, as part of an agreed emergency plan, and that any residual risk can be safely managed over the lifetime of the development; and - Land that is likely to be needed for present or future flood risk management infrastructure has been appropriately safeguarded from development to the extent that development would not prevent or hinder its construction, operation or maintenance	For the Exception Test, substantial wider sustainability benefits of the Scheme are set out in the Planning Statement [EN0110014/APP/2.3], together with the proposed measures that have been incorporated into the Scheme design to ensure that the Scheme is safe from flooding for its lifetime and will not increase the risk of flooding elsewhere. The Applicant has applied both the Sequential and Exception Tests and demonstrated how these have been met. Embedded flood risk measures of the Scheme are set out in the Design Principles, Parameters and Commitments [EN0110014/APP/7.18], Outline CEMP [EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2] and the Outline DEMP [EN0110014/APP/7.3].
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.	Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1] takes into account flood risk from all sources of flooding, taking into account projected impacts of climate change. This includes outline drainage strategies and appropriate treatment stages before runoff is discharged for the National Grid Substation, BESS and Project Substations. The ground beneath the Solar PV Arrays will be covered by grass and/or wildflower meadow which will be maintained to a suitable height using machinery will slow the rate of contact between rainfall and the soil. The surface water drainage arrangements are indicative at this stage and will be subject to further refinement at the detailed design. ES Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1] demonstrates that the Scheme is safe and will not detrimentally impact on flood risk within the Order Limits or elsewhere.
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.	ES Volume 3, Appendix 9.1 - FRA and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1] confirms that the outline surface water drainage strategy has been prepared in accordance with the guidance outlined in the CIRIA 'The SuDS Manual' C753. The strategy will be developed further at the detailed design stage, which will be secured as part of the DCO.
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	Preliminary Surface Water Drainage Maintenance Schedule in the Outline OEMP [EN0110014/APP/7.2] sets out the inspection and maintenance requirements for long term management of the development's surface water drainage system in accordance with The

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	lead local flood authority or water and sewerage company (through the Ofwat-approved Sewerage Sector Guidance [footnote 195]), or another body, such as an Internal Drainage Board.	SuDS Manual, CIRIA C753 , and identifies the various bodies responsible for ownership and maintenance of different elements of the system.
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.	
5.8.41	Energy projects should not normally be consented within Flood Zone 3b [footnote 196], 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.	The Scheme components within Flood Zones 2 and 3 would relate to electrical cabling, fencing, access and maintenance tracks, together with landscape and biodiversity mitigation and enhancement measures. Measures to not impede water flows are set out in the Design Principles, Parameters and Commitments [EN0110014/APP/7.18] . ES Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1] demonstrates that the Scheme is safe and will not detrimentally impact on flood risk within the Order Limits or elsewhere.
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.	
Historic Environment		
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	Through the design process, the Applicant has sought to apply the mitigation hierarchy avoid, reduce and mitigate impacts on heritage assets and their setting. This is demonstrated in ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] . Embedded measures

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	mitigation hierarchy has been applied in the ES (see Section 4.3). This should include consideration of heritage assets above, at, and below the surface of the ground. Consideration will also need to be given to the possible impacts, including cumulative, on the wider historic environment. The assessment should include reference to any historic landscape or seascape character assessment and associated studies as a means of assessing impacts relevant to the proposed project.	have been designed into the Scheme in relation to project level design principles, setbacks and visual screening in the new hedgerow and tree planting. ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] 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 and their significance, and the significance of their contribution to the setting. The chapter concludes that there are no significant residual effects identified during the construction, operation, and decommissioning of the Scheme.
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.	ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] has been informed by the Historic Environment Record (HER), together with aerial photograph surveys, geophysical surveys and targeted trial trenching.
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.	ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] sets out the existing baseline conditions, including heritage assets with an archaeological interest. This was informed by: • ES Volume 3, Appendix 10.1 - Heritage Statement [EN0110014/APP/6.3.10.1] • ES Volume 3, Appendix 10.2 - Archaeological DBA [EN0110014/APP/6.3.10.2] • ES Volume 3, Appendix 10.3 - Geophysical Survey [EN0110014/APP/6.3.10.3] • ES Volume 3, Appendix 10.4 - Aerial Investigation Mapping Survey [EN0110014/APP/6.3.10.4] • ES Volume 3, Appendix 10.5 - Evaluation Trenching Report [EN0110014/APP/6.3.10.5] • ES Volume 3, Appendix 10.6 - Archaeological Mitigation Strategy [EN0110014/APP/6.3.10.6]

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		Views from three heritage specific receptors has been included in ES Volume 3, Appendix 10.1 - Heritage Statement, with further views incorporating heritage receptors included in ES Volume 3, Appendices 7.4 to 7.6 [EN0110014/APP/6.3.7.4 – 6.3.7.6]. The chapter concludes that there are no significant residual effects identified during the construction, operation and decommissioning of the Scheme.
5.9.14	The applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents. Studies will be required on those heritage assets affected by noise, vibration, light and indirect impacts, the extent and detail of these studies will be proportionate to the significance of the heritage asset affected.	ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] provides an assessment of the Scheme on the historic environment, both above and below ground assets, within the Order limits, or that will be impacted by the Scheme. The chapter, together with the ES Volume 3, Appendix 10.1 - Heritage Statement [EN0110014/APP/6.3.10.1] describes the heritage assets and their significance, and the significance of their contribution to the setting. The assessment in ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] considers the indirect impact from noise and traffic on the setting of heritage assets. The chapter concludes that there are no significant residual effects identified during the construction, operation, and decommissioning of 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; and - Considering how visual or noise impacts can affect heritage assets, and whether there may be opportunities to enhance access to, or interpretation, understanding and appreciation of, the heritage assets affected by the scheme.	Embedded measures are secured through the Design Principles, Parameters and Commitments [EN0110014/APP/7.18], Outline CEMP [EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2], Outline LEMP [EN0110014/APP/7.4] and the Outline DEMP [EN0110014/APP/7.3], together with the Works Plan [EN0110014/APP/7.3]. As identified in the Outline LEMP [EN0110014/APP/7.4], the community accessible space in Sub-Site 4B has potential opportunities for archaeological educational interaction and the capacity for interpretation signage boards. ES Volume 3, Appendix 10.5 - Evaluation Trenching Report [EN0110014/APP/6.3.10.5] has been produced in support of this DCO Application. A detailed Archaeological Mitigation Strategy is to be drafted in accordance with the ES Volume 3, Appendix 10.6 - Archaeological Mitigation Strategy [EN0110014/APP/6.3.10.6], secured via a Requirement of the draft DCO [EN0110014/APP/3.1].
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 Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] assesses the likely direct, indirect, permanent and temporary impacts of the Scheme on the historic environment.

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		Embedded measures are secured through the Design Principles, Parameters and Commitments [EN0110014/APP/7.18] , Outline CEMP [EN0110014/APP/7.1] , Outline OEMP [EN0110014/APP/7.2] , Outline LEMP [EN0110014/APP/7.4] and the Outline DEMP [EN0110014/APP/7.3] , together with the Works Plan [EN0110014/APP/7.3] .
5.9.17	Applicants should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.	There are no World Heritage Sites affected by the Scheme. There are no Conservation Areas within the Order Limits although a number surround the Order Limits. Embedded measures are secured through the Design Principles, Parameters and Commitments [EN0110014/APP/7.18], Outline CEMP [EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2], Outline LEMP [EN0110014/APP/7.4] and the Outline DEMP [EN0110014/APP/7.3], together with the Works Plan [EN0110014/APP/7.3]. ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] concludes that there are no significant residual effects identified during the construction, operation, and decommissioning of the Scheme.
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 Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] 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 and their significance, and the significance of their contribution to the setting.
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.	Embedded measures are secured through the Design Principles, Parameters and Commitments [EN0110014/APP/7.18], Outline CEMP [EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2], Outline LEMP [EN0110014/APP/7.4] and the Outline DEMP [EN0110014/APP/7.3], together with the Works Plan [EN0110014/APP/7.3]. A detailed Archaeological Mitigation Strategy is to be drafted in accordance with the ES Volume 3, Appendix 10.6 - Archaeological Mitigation Strategy [EN0110014/APP/6.3.10.6], secured via a Requirement of the draft DCO [EN0110014/APP/3.1].
5.9.20	Where appropriate, the Secretary of State will impose requirements on the Development Consent Order to ensure that the work is undertaken in a timely manner, in accordance with a written scheme of investigation that complies with the policy in this NPS and which has been agreed in writing with	ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] concludes that there are no significant residual effects identified during the construction, operation, and decommissioning of the Scheme.

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	the relevant local authority, and to ensure that the completion of the exercise is properly secured.	ES Volume 1, Appendix 10.5 - Evaluation Trenching Report [EN0110014/APP/6.3.10.5] has been produced in support of this DCO Application. A detailed Archaeological Mitigation Strategy is to be drafted in accordance with the ES Volume 3, Appendix 10.6 - Archaeological Mitigation Strategy [EN0110014/APP/6.3.10.6], secured via a Requirement of the draft DCO [EN0110014/APP/3.1].
5.9.21	Where the loss of significance of any heritage asset has been justified by the applicant on the merits of the new development and the significance of the asset in question, the Secretary of State should consider: • Imposing a requirement in the Development Consent Order; and • Requiring the applicant to enter into an obligation 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.	
5.9.22	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	
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 [footnote 205], or included on Cof Cymru [footnote 206] for Wales; • Historic landscape character records; • The relevant Historic Environment Record(s), and similar sources of information; • Representations made by interested parties during the examination process; and	ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] 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 and their significance, and the significance of their contribution to the setting. The setting of each heritage asset and contribution made by said setting to their significance is set out in ES Volume 3, Appendix 10.1 - Heritage Statement [EN0110014/APP/6.3.10.1]. This confirms the assessment of significance has been undertaken in accordance with Historic England's Statements of Heritage Significance. Analysing Significance in Heritage Assets (2019). 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.

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	Expert advice, where appropriate, and when the need to understand the significance of the heritage asset demands it.	
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 Volume 3, Appendix 10.5 - Evaluation Trenching Report [EN0110014/APP/6.3.10.5] has been produced in support of this DCO Application. A detailed Archaeological Mitigation Strategy is to be drafted in accordance with the ES Volume 3, Appendix 10.6 - Archaeological Mitigation Strategy [EN0110014/APP/6.3.10.6], secured via a Requirement of the draft DCO [EN0110014/APP/3.1]. Embedded measures are secured through the Design Principles, Parameters and Commitments [EN0110014/APP/7.18], Outline CEMP [EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2], Outline LEMP [EN0110014/APP/7.4] and the Outline DEMP [EN0110014/APP/7.3], together with the Works Plan [EN0110014/APP/7.3]. ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] 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 and their significance, and the significance of their contribution to the setting. With embedded measures in place, the assessment concludes that there are no significant residual effects identified during the construction, operation, and decommissioning of the Scheme. ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] outlines that 'substantial harm' is afforded to any adverse effect that is of a high magnitude of impact, whilst a <u>low to</u> medium magnitude of impact would represent 'less than substantial harm'. Substantial harm to, or total loss of, any designated heritage assets' significance as a result of the Scheme is not anticipated. Therefore, the policy tests regarding substantial harm outlined in NPS EN-1 do not apply. ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] concludes that following embedded mitigation, there will be no harm to the majority of designated heritage assets and no harm to all the non-designated heritage assets. For two designated heritage assets, Moulton Farmhouse and Barn Cottages Grade II listed buildings, the assessment found
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.	
5.9.28	When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset's conservation. The more important the asset, the greater the weight should be. This is irrespective of whether any potential harm amounts to substantial harm, total loss, or less than substantial harm to its significance.	
5.9.29	The Secretary of State should give considerable importance and weight to the desirability of preserving all heritage assets. Any harm or loss of significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification.	
5.9.30	Substantial harm to or loss of significance of a grade II Listed Building or a grade II Registered Park or Garden should be exceptional.	
5.9.31	Substantial harm to or loss of significance of assets of the highest significance, including Scheduled Monuments; Protected Wreck Sites; Registered Battlefields; grade I and II* Listed Buildings; grade I and II* Registered Parks and Gardens; and World Heritage Sites, should be wholly exceptional.	

Relevant Paragraph	Detail	Scheme Compliance
5.9.32	Where the proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset the Secretary of State should refuse consent unless it can be demonstrated that the substantial harm to, or loss of, significance is necessary to achieve substantial public benefits that outweigh that harm or loss, or all the following apply: • The nature of the heritage asset prevents all reasonable uses of the site • No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation • Conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and • The harm or loss is outweighed by the benefit of bringing the site back into use.	minor adverse/negligible effects owing to the change in the settings. The level of harm caused by this impact is considered to be 'less than substantial harm' at the lower end of the scale. For Barn Cottages, this will be reduced to no harm once the landscaping screening has matured. No harm has been identified in relation to 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. Given the clear and urgent need to deploy renewable energy at speed and scale as set out in the Statement of Need [EN0110014/APP/7.11] and Planning Statement [EN0110014/APP/7.14], together with the wider public benefits, the Scheme demonstrably shows substantial public benefits that outweigh the less substantial harm identified. 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, 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.
5.9.33	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.	
5.9.34	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 Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] concludes that there are no significant adverse effects anticipated on non-designated heritage assets.
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 Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] states no significant effect has been identified on any Conservation Area within the vicinity of the Scheme.

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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 such assets and treat favourably applications that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of, the asset. When considering applications that do not do this, the Secretary of State should give great weight to any negative effects, when weighing them against the wider benefits of the application. The greater the negative impact on the significance of the designated heritage asset, the greater the benefits that will be needed to justify approval.	ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] 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 Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] concludes that following the implementation mitigation measures there will be no residual significant effects on any designated or non-designated assets as a result of the Scheme. Embedded measures are secured through the Design Principles, Parameters and Commitments [EN0110014/APP/7.18], Outline CEMP [EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2], Outline LEMP [EN0110014/APP/7.4] and the Outline DEMP [EN0110014/APP/7.3], together with the Works Plan [EN0110014/APP/7.3].
Landscape and Visual		
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 Volume 1, Chapter 7 – Landscape and Visual [EN0110014/APP/6.1.7] presents an assessment of the likely significant effects during all phases of the Scheme. Having applied the mitigation hierarchy and incorporated embedded measures within the design of the Scheme, significant residual adverse effects have been identified on the landscape character (NCA and LCA) in Table 7.14 of ES Volume 1, Chapter 7 – Landscape and Visual [EN0110014/APP/6.17] during the construction, operation (Year 1 and 15) and decommissioning phases. As set out in Table 7.14 of ES Volume 1, Chapter 7 – Landscape and Visual [EN0110014/APP/6.17], significant residual adverse effects have been identified on the landscape character and also on features within the Order Limits during the construction, operation (Year 1 and 15) and decommissioning phases. After Year 15 of operation, the number of landscape receptors with a significant residual adverse effect would reduce to 6 receptors compared to 13 receptors at Year 1 of operation. Significant residual adverse effects on the landscape character and features would remain in relation to the BESS Site, Site 1, Site 7 and Site 8. As reported in Table 7.14 of ES Volume 1, Chapter 7 – Landscape and Visual [EN0110014/APP/6.17], significant residual adverse effects on visual amenity have also been identified on a recreational route (Via Beata Way) during the construction phase. No significant

Relevant Paragraph	Detail	Scheme Compliance
		residual adverse effects have been identified on Via Beata Way or Boudicca Way recreational routes during Year 1 or Year 15 of operation. Significant residual adverse effects have been identified in relation to various representative locations on PRoW during all phases of the Scheme. At Year 1 of operation the Scheme has been assessed to have significant adverse effects at 52 receptors, reducing to 17 receptors in Year 15 of operation.
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 [EN0110014/APP/7.17] sets out project level design principles and design offset buffers. Project level design principle includes that the Scheme should respond to the character of the Sites, informed by Natural England Character Area Profiles and South Norfolk Local Landscape Character Assessment and Place Making Guide SPD, including the character of the River Valleys. Embedded mitigation within the Scheme is described in ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.17]. In accordance with the mitigation hierarchy, the design has focused on avoiding environmental constraints as far as practicable. This has included developing buffers (offsets) to existing green infrastructure assets to retain and protect key landscape features, offsets from PRoW and from individual residential dwellings. In addition, as far as practicable, Solar PV Arrays have been set back and reduced in parts of the Sites, for example, where the landscape is more visually prominent owing to the topography and within a more sensitive landscape area, such as at Sub-Site 8B.
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.	The landscape designations were considered in the site selection process as set out in the Site Selection Assessment [EN0110014/APP/7.20] and the landscape and visual context of the Order Limits in the design approach to the Scheme described in the Design Approach Document [EN0110014/APP/7.17]. National Parks, the Broads and National Landscapes are not located in the Order Limits.
5.10.12	Outside nationally designated areas, there are landscapes that may be highly valued locally. Where a local development document in England or a local development plan in Wales has policies based on landscape or waterscape character assessment, these should be paid particular attention. However, locally valued landscapes should not be used in	The Design Approach Document [EN0110014/APP/7.17] sets out project level design principles and design offset buffers. Project level design principle includes that the Scheme should respond to the character of the Sites, informed by Natural England Character Area Profiles and South Norfolk Local Landscape Character Assessment and Place Making Guide SPD, including the character of the River Valleys.

Relevant Paragraph	Detail	Scheme Compliance
	themselves to refuse consent, as this may unduly restrict acceptable development.	ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7] confirms that the Scheme would extent int the A1 Tas Rural River Valley Local Character Area. Local planning policy refers to protecting the distinctive characteristics, special qualities and geographical extents of the Rural River Valleys. Whilst during construction, the residual adverse effect is assessed as significant, during operation and decommissioning phases no significant residual effect has been identified on the A1 Tas Rural River Valley LCA.
5.10.13	All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites.	ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7] provides an assessment of the likely effects of all phases of the Scheme on visual amenity, including at residential properties and representative locations on PRoW and recreational walking routes. As set out in the Planning Statement [EN0110014/APP/7.14] , with the critical and urgent need for the Scheme enshrined in national policy, it is considered that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case. It is considered that the wider substantial benefits of the Scheme as CNP Infrastructure, including delivery of a significant level of low carbon energy generation, ecological and landscape enhancements, biodiversity net gain, provision of permissive paths and community accessible space, together with employment, education and training outweigh the significant adverse residual effects of the Scheme.
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.	
5.10.16	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 Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7] provides a landscape and visual assessment of the likely effects during all phases of the Scheme. This includes and assessment on National Character Areas and Local Character Areas with reference to published studies, national and local planning policy and guidance. The assessment considers the likely effects from the Scheme in isolation and in addition to cumulative schemes.
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 opportunities for creating positive benefits or enhancement have been recognised and incorporated into the design, delivery and operation of the scheme.	The landscape designations were considered in the site selection process as set out in the Site Selection Assessment [EN0110014/APP/7.20] and the landscape and visual context of the Order Limits in the design approach to the Scheme described in the Design Approach Document [EN0110014/APP/7.17] . The Design Approach Document [EN0110014/APP/7.17] also sets out project level design principles and design offset buffers which were considered within the design process, together with how the design has evolved to respond to the landscape and visual context.

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		The hierarchical mitigation approach adopted has been to: • Avoid where practicable, effects through the overall design and layout of the Scheme; • Reducing effects as far as practicable through the Green Infrastructure Strategy; and • Additional mitigation through the compensation of potential losses. However, for the Scheme, no additional mitigation has been identified. Embedded mitigation within the Scheme is described in ES Volume 1, Chapter 7 – Landscape and Visual [EN0110014/APP/6.17]. In accordance with the mitigation hierarchy, the design has focused on avoiding environmental constraints as far as practicable. This has included developing buffers (offsets) to existing green infrastructure assets to retain and protect key landscape features, offsets from PRoW and from individual residential dwellings. In addition, as far as practicable, Solar PV Arrays have been set back and reduced in parts of the Sites, for example, where the landscape is more visually prominent owing to the topography and within a more sensitive landscape area, such as at Sub-Site 8B. Embedded measures for the construction and operation phases are also set out in the Outline LEMP [EN0110014/APP/7.4]. This sets out prescriptions and the management for the proposed landscape and ecological measures. This is to support the establishment of the Scheme. The overall aim of the Outline LEMP [EN0110014/APP/7.4] is to provide ecological enhancement, strengthen the green infrastructure within the local area and support landscape and visual mitigation requirements as identified in ES Volume 1, Chapter: 7 - Landscape and Visual [EN0110014/APP/6.1.7].
5.10.20	The assessment should include the effects on landscape components and character (including key characteristics) during construction and operation. For projects which may affect a National Park, The Broads or a National Landscape the assessment should include effects on the natural beauty and special qualities of these areas’.	ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7] provides a landscape and visual assessment of the likely effects during all phases of the Scheme. This includes an assessment on National Character Areas, Local Character Areas and landscape character and features in the Order Limits. The Scheme would not affect a National Park, The Broads or a National Landscape.
5.10.21	The assessment should include the visibility and conspicuousness of the project during construction and of the presence and operation of the project and potential impacts on views and visual amenity. This should include light pollution effects, including on dark skies, local amenity, and nature conservation.	ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7] provides an assessment of the likely effects of all phases of the Scheme on visual amenity, including at residential properties and representative locations on PRoW and recreational walking routes. Photographs and visualisations have been included to support the conclusions of the assessment.
5.10.22	The assessment should also address the landscape and visual effects of light pollution and other emissions (see	ES Volume 3, Appendix 7.8 - Residential Visual Amenity Assessment [EN0110014/APP/6.3.7.8] concludes that following an initial assessment of 20 residential properties and a detailed assessment of two residential properties, no residential properties

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	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.	were found to meet the Visual Amenity Threshold. It was considered that the Scheme would overall not have overwhelming, dominating and/or overbearing effects on the visual amenity experienced by residents of the properties. The Order Limits are not located within an International Dark Sky Nature reserve, but at the regional level the Order Limits are within a Rural Dark Landscape as defined in Norfolk County Council's Environmental Lighting Zones Policy. A lighting strategy has been undertaken (ES Volume 3, Appendix 7.11 - Lighting Strategy [EN0110014/APP/6.3.7.11]) to set out the commitments to lighting; measures of which are secured in the Outline CEMP [EN0110014/APP/7.1] and Outline OEMP [EN0110014/APP/7.2]. This includes measures to minimise light intrusion and effects on landscape and visual receptors in the context of the Scheme which has limited light sources. Therefore, no assessment of the effects of lighting on landscape and visual receptors has been undertaken. Embedded measures are secured through the Outline CEMP [EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2], Outline LEMP [EN0110014/APP/7.4] and the Outline DEMP [EN0110014/APP/7.3], which include control measures to minimise light pollution and other emissions.
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 Ecology Management Plan(s) substantially in accordance with the Outline LEMP [EN0110014/APP/7.4] and secured through the requirement of the draft DCO [EN0110014/APP/3.1], which provides the framework for the management plan that will be implemented. The Outline LEMP [EN0110014/APP/7.4] sets out prescriptions and the management for the proposed landscape and ecological measures. The overall aim of the Outline LEMP [EN0110014/APP/7.4] is to provide ecological enhancement, strengthen the green infrastructure within the local area and support landscape and visual mitigation. The Green Infrastructure Strategy in the Outline LEMP [EN0110014/APP/7.4] includes for the retention and enhancement of green infrastructure assets, including restoration of ghost ponds, where practicable, together with new tree and hedgerow planting.
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	ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7] establishes an environmental baseline for the landscape and visual assessment, which includes existing overhead electrical lines and road infrastructure in the landscape, together with other surrounding developments such as settlements and solar farms.

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	judging the weight they should give to the assessed visual impacts of the proposed development.	
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.	The mitigation hierarchy for landscape and visual amenity have been applied throughout the design of the Scheme and the landscape and visual impacts have been minimised as far as practicable. The Green Infrastructure Strategy has sought to balance the requirements for visual screening (achieved through a range of new vegetation) against the defining visual qualities, with the landscape comprising large scale field structure with relatively open views. Taking into account the landscape context, the significant residual adverse effects identified cannot be mitigated further. The Statement of Need [EN0110014/APP/7.11] provides an explanation of why the Scheme is urgently needed at the proposed scale. Given the nature of the Scheme and the rural context, 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 viability of the Scheme.
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.	Embedded measures are secured through the Design Principles, Parameters and Commitments [EN0110014/APP/7.18], Outline CEMP [EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2], Outline LEMP [EN0110014/APP/7.4] and the Outline DEMP [EN0110014/APP/7.3], together with the Works Plan [EN0110014/APP/7.3]. Design commitments include components of the Scheme to be externally finished to be in keeping with the prevailing surrounding environment and carefully selected in subdued, non-reflective tones to sit as discreetly as practicable within the landscape.
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.	Any landscaping mitigation will be implemented and managed within the Order Limits.
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 in the design of the Scheme at the time of submission so that the detailed design of the Scheme can be informed by technical considerations, post-consent work and take advantage of innovation in technology. The extent of the flexibility is detailed in ES Volume 1, Chapter 4 - The Scheme [EN0110014/APP/6.1.4]. The approach to the EIA is described in ES Volume 1, Chapter 2 - EIA Methodology [EN0110014/APP/6.1.2]. The ES adopts the Rochdale Envelope approach to maintain flexibility in the design and layout of the Scheme in the DCO Application. The Rochdale

Relevant Paragraph	Detail	Scheme Compliance
		Envelope ensures a robust reasonable worst-case assessment of the likely significant environmental effects of the Scheme. The maximum parameters of the Scheme are shown spatially on the Works Plan [EN0110014/APP/2.3] and described in the Design Principles, Parameters and Commitments [EN0110014/APP/7.18], with further measures secured in various outline management plans submitted with the DCO Application. Detailed management plans will be prepared substantially in accordance with the outline management plans which will be secured through the draft DCO [EN0110014/APP/3.1].
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.	National Parks, the Broads and National Landscapes are not located in the Order Limits. The Design Approach Document [EN0110014/APP/7.17] demonstrates how the design of the Scheme has been developed in accordance with a 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 to guide decision making and embed good design outcomes to the Scheme.
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.	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 Order Limits by a broad range of technical disciplines (including landscape and visual, noise, ecology, and heritage). The maximum parameters of the Scheme are shown spatially on the Works Plan [EN0110014/APP/2.3] and described in the Design Principles, Parameters and Commitments [EN0110014/APP/7.18]. Embedded measures are secured in the Outline CEMP [EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2], Outline LEMP [EN0110014/APP/7.4] and the Outline DEMP [EN0110014/APP/7.3]. Detailed management plans will be prepared substantially in accordance with these outline management plans which will be submitted to and approved by the relevant planning authority.
5.10.35	The scale of energy projects means that they will often be visible across a very wide area. The Secretary of State should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project.	The mitigation hierarchy for landscape and visual amenity have been applied throughout the design of the Scheme and the landscape and visual impacts have been minimised as far as practicable. ES Volume 1, Chapter 7 – Landscape and Visual [EN0110014/APP/6.1.7] presents an assessment of the likely significant effects during all phases of the Scheme. As described in the responses above, significant adverse residual effects on National Character Areas, Local Character Areas, landscape character and features within the Order Limits and on visual

Relevant Paragraph	Detail	Scheme Compliance
		amenity have been identified. 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. As set out in the Statement of Need [EN0110014/APP/7.11] and Planning Statement [EN0110014/APP/7.14], with the critical and urgent need for the Scheme enshrined in national policy, it is considered that the residual adverse landscape and visual effects are demonstrably outweighed by the Scheme's benefits and needs case. It is considered that the wider substantial benefits of the Scheme as CNP Infrastructure, including delivery of a significant level of low carbon energy generation, ecological and landscape enhancements, biodiversity net gain, provision of permissive paths and community accessible space, together with employment, education and training outweigh the significant adverse residual effects of the Scheme. 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 Green Infrastructure Strategy outweigh the adverse residual effects of the Scheme. Therefore, the Scheme is considered acceptable in terms of its overall effects on landscape and visual amenity and are not considered to outweigh the substantial benefits of the Scheme. A more detailed consideration of the planning balance is contained in the Planning Statement [EN0110014/APP/7.14].
5.10.36	In reaching a judgement, the Secretary of State should consider whether any adverse impact is temporary, such as during construction, and/or whether any adverse impact on the landscape will be capable of being reversed in a timescale that the Secretary of State considers reasonable.	The operational life of the Scheme is for a period up to 60 years, secured via a requirement of the draft DCO [EN0110014/APP/3.1]. As set out in ES Volume 1, Chapter 4 – The Scheme [EN0110014/APP/6.1.4] and the Outline DEMP, the National Grid Substation and Grid Connection Infrastructure will remain in situ following decommissioning. Most of the identified residual adverse landscape and visual effects are of a temporary nature and, therefore, the Secretary of State should also take into account the reversibility of the effects where they are not associated with the National Grid Substation and Grid Connection Infrastructure.
5.10.37	The Secretary of State should consider whether the project has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to minimise harm to the landscape, including by appropriate mitigation.	The landscape designations were considered in the site selection process as set out in the Site Selection Assessment [EN0110014/APP/7.20] and the landscape and visual context of the Order Limits in the design approach to the Scheme described in the Design Approach Document [EN0110014/APP/7.17] . The Design Approach Document [EN0110014/APP/7.17] also sets out project level design principles and design offset buffers

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		which were considered within the design process, together with how the design has evolved to respond to the landscape and visual context. The hierarchical mitigation approach adopted has been to: • Avoid where practicable, effects through the overall design and layout of the Scheme; • Reducing effects as far as practicable through the Green Infrastructure Strategy; and • Additional mitigation through the compensation of potential losses. However, for the Scheme, no additional mitigation has been identified. Landscape and ecological enhancements and mitigation measures for the Scheme are shown in the Green Infrastructure Strategy within the Outline LEMP [EN0110014/APP/7.4].
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 [EN0110014/APP/2.3] and the Design Principles, Parameters and Commitments [EN0110014/APP/7.18] secure the design of the Scheme through the draft DCO [EN0110014/APP/3.1] , in line with statutory and technical requirements.
Land Use, Including Open Space, Green Infrastructure, and Green Belt		
5.11.8	The ES (see Section 4.3) should identify existing and proposed land uses near the project, any effects of replacing an existing development or use of the site with the proposed project or preventing a development or use on a neighbouring site from continuing. Applicants should also assess any effects of precluding a new development or use proposed in the development plan. The assessment should be proportionate to the scale of the preferred scheme and its likely impacts on such receptors. For developments on previously developed land, the applicant should ensure that they have considered the risk posed by land contamination and how it is proposed to address this.	The Order Limits comprise largely of agricultural land and there are no development plan allocations within or adjoining the Order Limits. A summary of the planning history within the Order Limits is provided in the Planning Statement [EN0110014/APP/7.14]. Therefore, the Scheme will not preclude proposed land uses that are allocated within the local development plan. With regard to proposed land uses nearby, a list of cumulative schemes are identified and assessed within the ES [EN0110014/APP/6.1].
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	The Scheme does not impact any open space, sports or recreational buildings or land. The Scheme does not involve the loss of playing fields.

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	infrastructure, applicants should refer to the Green Infrastructure Framework [footnote 221].	
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.	A summary of the planning history within the Order Limits is provided in the Planning Statement [EN0110014/APP/7.14]. There are no development plan allocations within or adjoining the Order Limits. NCC and SNC were consulted with regarding the list of the cumulative schemes to be considered within the ES [EN0110014/APP/6.1].
5.11.12	Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5).	Previously developed land and Best and Most Versatile (BMV) quality land have been considered as part of the site selection process as set out in the Site Selection Assessment [EN0110014/APP/7.20]. At an initial stage of the site selection process, Natural England's provisional mapping of Agricultural Land Classification (ALC) was used. This shows the area of the Order Limits is predominantly undifferentiated Grade 3, with scattered pockets of Grade 2 and Grade 4 land. The ALC map does not differentiate between Grades 3a and 3b. Natural England has also published a series of maps showing the likelihood of BMV land. Based on the maps, there are limited areas of low likelihood of BMV shown between Norwich and Diss. As confirmed in ES Volume 1, Chapter 15 – Soils and Agricultural Land [EN0110014/APP/6.15], the Order Limits was identified as likely to be some of the lowest quality land in the wider area. It is evident that, in respect of initial site selection within a reasonable distance of the grid connection point, no land is identified as likely to be of a lower quality or overall proportionate lower mix of BMV quality land. Owing to the nature of the land quality within the Order Limits and on a wider scale, as reported in ES Volume 1, Chapter 15 – Soils and Agricultural Land [EN0110014/APP/6.15], it has not been possible to avoid BMV quality land entirely. The Applicant has taken steps to avoid, reduce, and subsequently mitigate impacts on BMV as set out in the ES Volume 1, Chapter 15 – Soils and Agricultural Land [EN0110014/APP/6.15], Planning Statement [EN0110014/APP/7.14] and Design Approach Document [EN0110014/APP/7.17]. Along with many factors, BMV quality land was a consideration in the design evolution of the Scheme. During the design process, the Applicant sought to, where practicable, reduce the use of BMV quality land within the Solar PV Array areas, including for example, removal of pockets of BMV quality land from the Solar PV Arrays within Site 3, Sub-Site 5B, Site 6 and Sub-Site 8A during the design process. Sub-Site 3A was entirely removed from the Order Limits owing to several factors, including its agricultural land quality (largely Grade 2). Such examples are set out in the Design Approach Document [EN0110014/APP/7.17].

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		Further, as part of the design of the Scheme, parcels of land within the Sites have been retained for agricultural use. Whilst other land within the Sites would not be available for arable production, the design of the areas with Solar PV Arrays would be compatible with other farming practices, such as sheep grazing. An Outline Soils Resource Management Plan [EN0110014/APP/7.9] (Outline SRMP) has been submitted with the DCO Application to manage soils as a resource and minimise adverse impacts during the construction and decommissioning phases of the Scheme.
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.	An Outline SRMP [EN0110014/APP/7.9] has been submitted with the DCO Application to manage soils as a resource and minimise adverse impacts during the construction and decommissioning phases of the Scheme. ES Volume 1, Chapter 15 - Soils and Agricultural Land [EN0110014/APP/6.1.15] concludes that with mitigation measures in place, there would be no significant adverse residual effects on soils as a resource during all phases of the Scheme. For soils, there would be a residual beneficial effect owing to the long-term resting of land from arable production, although this is not expected to be significant.
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 Outline SRMP [EN0110014/APP/7.9] has been submitted with the DCO Application and includes: • Details of relevant guidance relating to soil resources and their management; • Relevant background information, including climate, 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 objectives of the Outline SRMP [EN0110014/APP/7.9], which is secured through the draft DCO [EN0110014/APP/3.1] are to set out the principles for soil handling and management to minimise disturbance to soils.
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.	As well as the willingness of landowners, which is a key consideration for site selection, the site selection and evaluation process as reported in the Site Selection Assessment [EN0110014/APP/7.20] considered a number of environmental and planning constraints, together with factors influencing site selection and design, including irradiance and topography,

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		proximity of a site to dwellings, agriculture land classification and land type and accessibility, as set out in paragraph 2.10.10 to 2.10.40 of the NPS EN-3. ES Volume 3, Appendix 16.1 – Ground Conditions Assessment [EN0110014/APP/6.3.16.1] considers ground contamination, ground stability risk and unexploded ordnance (UXO) risk. A ground investigation will be undertaken post consent. The ground investigation will be designed to allow the further evaluation of the pollutant linkages identified and facilitate design requirements for risk reduction measures, if required. Embedded mitigation to manage the risks associated with contaminants and land instability is set out in the Outline CEMP [EN0110014/APP/7.1] and Outline DEMP [EN0110014/APP/7.3]. With regard to residual effects, ES Volume 1, Chapter 16 – Ground Conditions [EN0110014/APP/6.1.16] concludes with mitigation measures in place, there will be no significant adverse residual effects associated with any existing land contamination within the Order Limits.
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.	Minerals resources are considered in ES Volume 3, Appendix 16.2 - Minerals Resource Assessment Desk Study [EN0110014/APP/6.3.16.2]. The assessment identifies that small parts of the Order Limits (less than 4% of the total area (50ha)) are underlain by superficial strata of Alluvium, Leet Hill Sand and Gravel Member, Lowestoft Formation - Sand and Gravel and River Terrace Deposits, which are classified as sand and gravel mineral resources and are safeguarded. The assessment concludes that these formations as not being economically viable and/or practicable to extract. Nevertheless, the Scheme will potentially sterilise the underlying sand and gravel mineral resources until the Scheme is fully decommissioned. ES Volume 1, Chapter 16 – Ground Conditions [EN0110014/APP/6.1.16] concludes that the construction, operational and decommissioning phases of the Scheme would have a negligible residual effect on mineral resources, which is not considered significant.
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	The Applicant has worked with the landowners of the Sites of the Order Limits in developing the Scheme and the Green Infrastructure Strategy (Outline LEMP [EN0110014/APP/7.4]) to enable the businesses to continue during the operation of the Scheme and to be converted back to agricultural use following decommissioning. No access to farms will be severed. The

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	minimise these effects and the effects on existing or planned uses near the site by the application of good design principles, including the layout of the project and the protection of soils during construction.	landowners of the Sites have entered into an option agreement for the Sites. The farms involved will benefit from the guaranteed income from the diversification of the enterprise base. Parcels of land within the Sites have been retained for agricultural use. Whilst other land within the Sites would not be available for arable production, the design of the areas with Solar PV Arrays would be compatible with other farming practices, such as sheep grazing. The surrounding land is predominantly agricultural. The Scheme is not considered to impact the continued use of this land for agricultural purposes. ES Volume 1, Chapter 15 - Soils and Agricultural Land [EN0110014/APP/6.1.15] concludes no significant adverse residual effects on farm businesses. An Outline SRMP [EN0110014/APP/7.9] has been submitted with the DCO Application. This includes outline methodologies for: - Any requirements for pre-construction soil survey or soil information collection; - Soil handling methods (stripping, stockpiling and reinstatement) for any soils that will be disturbed by the construction of the Scheme; - Monitoring procedures required for all soils (disturbed or those left in situ) during the construction of the Scheme, including details of roles and responsibilities; - Restoration methods for land that is disturbed temporarily during construction and subsequently returned to agricultural use for the operation of the Scheme; - Any measures required to ameliorate soils to ensure the original land quality is achieved upon reinstatement; and - Monitoring required during the operation of the Scheme.
5.11.24	Where green infrastructure is affected, the Secretary of State should consider imposing requirements to ensure the functionality and connectivity of the green infrastructure network is maintained in the vicinity of the development and that any necessary works are undertaken, where possible, to mitigate any adverse impact and, where appropriate, to improve that network and other areas of open space including appropriate access to National Trails and other public rights of way and new coastal access routes.	The Design Approach Document [EN0110014/APP/7.17] demonstrates how the design of the Scheme has been developed in accordance with a design framework, including the adoption of project level design principles and design buffers such as maintaining a 15m design offset from PRoW. The effects on the PRoW and recreational routes are assessed for all phases of the Scheme in the ES Volume 1, Chapter 7 – Landscape and Visual [EN0110014/APP/6.1.7] and in ES Volume 1, Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]. Embedded measures to minimise effects as far as practicable are included in the Design Principles, Parameters and Commitments [EN0110014/APP/7.18], Outline CEMP

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		[EN0110014/APP/7.1], Outline LEMP [EN0110014/APP/7.4] and the Outline PRoWPPMP [EN0110014/APP/7.8]. The Green Infrastructure Strategy in the Outline LEMP [EN0110014/APP/7.4] includes for the retention and enhancement of green infrastructure assets, including restoration of ghost ponds, where practicable, together with new tree and hedgerow planting. The Green Infrastructure Strategy illustrates that approximately 25ha of new tree planting (in addition to hedgerow tree improvements) within the Scheme. In addition, through the provision for new permissive paths and community accessible space, the Scheme provides opportunities for greater connectivity, access and amenity use. These measures positively respond to the Greater Norwich Green Infrastructure Strategy.
5.11.27	Existing trees and woodlands should be retained wherever possible. Under the Environmental Act 2021 the government set a legally binding target to 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 ES Volume 3, Appendix 7.10 - Preliminary Arboriculture Impact Assessment [EN0110014/APP/6.3.7.10]. The Design Approach Document [EN0110014/APP/7.17] demonstrates how the design of the Scheme has been developed in accordance with a design framework, including the adoption of project level design principles and design buffers. A project level design principle is to retain and enhance existing vegetation, where possible, and features of value to retain the fabric of the Sites and aid the integration of the Scheme within the environment and the characteristics of the surroundings, as far as practicable. The design buffers are secured through the Design Principles, Parameters and Commitments [EN0110014/APP/7.18]. This includes 10m for hedgerows, 15m for individual trees, groups of trees and non-Ancient Woodland, 30m for Ancient Woodland and 15x width of tree stem diameter or 5m from the edge of the tree's canopy, whichever is greater for Veteran and Ancient trees. The Green Infrastructure Strategy in the Outline LEMP [EN0110014/APP/7.4] includes for the retention and enhancement of green infrastructure assets and illustrates that approximately 25ha of new tree planting (in addition to hedgerow tree improvements) within the Scheme. It is considered that the Green Infrastructure Strategy supports the Governments' legally binding target to increase the tree canopy.
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.	Minerals resources are considered in ES Volume 3, Appendix 16.2 - Minerals Resource Assessment Desk Study [EN0110014/APP/6.3.16.2] . The assessment identifies that small parts of the Order Limits (less than 4% of the total area (50ha)) are underlain by superficial strata of Alluvium, Leet Hill Sand and Gravel Member, Lowestoft Formation - Sand and Gravel and River Terrace Deposits, which are classified as sand and gravel mineral resources and are safeguarded. The assessment concludes that these formations as not being economically

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		viable and/or practicable to extract. Nevertheless, the Scheme will potentially sterilise the underlying sand and gravel mineral resources until the Scheme is fully decommissioned. ES Volume 1, Chapter 16 – Ground Conditions [EN0110014/APP/6.1.16] concludes that the construction, operational and decommissioning phases of the Scheme would have a negligible residual effect on mineral resources, which is not considered significant.
5.11.30	Public Rights of way, National Trails, and other rights of access to land are important recreational facilities for example for walkers, cyclists and horse riders. The Secretary of State should expect applicants to take appropriate mitigation measures to address adverse effects on coastal access, National Trails, other rights of way and open access land and, where appropriate, to consider what opportunities there may be to improve or create new access. In considering revisions to an existing right of way, consideration should be given to the use, character, attractiveness, and convenience of the right of way.	The Outline CTMP [EN0110014/APP/7.6], Outline PRoWPPMP [EN0110014/APP/7.8], Outline OTMP [EN0110014/APP/7.7] and Outline LEMP [EN0110014/APP/7.4] outlines embedded measures to protect PRoW, recreational routes and permissive paths during all phases of the Scheme. PRoW management measures include, but not limited to: • Signage will be installed along the PRoW to inform users about construction activity. The signs will provide information on construction times and contact details for a public liaison officer; • Drivers must yield to all PRoW users, including equestrians; • Where applicable, access tracks will be widened to allow vehicles to pass PRoW users safely; • Traffic Marshals or Banksman will be positioned where relevant along a PRoW impacted by construction traffic, to hold vehicles if a PRoW user is present and advise PRoW users of the potential for construction vehicles; • Speeds to be limited to 5-10mph near PRoW; • The PRoW will be kept clear of construction vehicles and apparatus outside of permitted construction hours so far as is practicable to do so; and • Any damage to the surface of the PRoW directly attributable to the Scheme will be repaired as soon as practicable. The surface will be made good and returned to its original condition following construction. As part of the Scheme, three new permissive paths are proposed, together with community accessible space, as set out in the Outline LEMP [EN0110014/APP/7.4].
5.11.34	The Secretary of State should ensure that applicants do not site their scheme on the best and most versatile agricultural land without justification. Where schemes are to be sited on best and most versatile agricultural land the Secretary of State should take into account the economic and other benefits of that land. Where development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.	The use of agricultural land has been shown to be necessary, and the Applicant has considered BMV quality land during the site selection and design process as described in the Site Selection Assessment [EN0110014/APP/7.20] and Design Approach Document [EN0110014/APP/7.17]. Owing to the nature of the land quality within the Order Limits and on a wider scale, as reported in ES Volume 1, Chapter 15 – Soils and Agricultural Land [EN0110014/APP/6.15], it has not been possible to avoid BMV quality land entirely. The Applicant has taken steps to avoid,

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		reduce, and subsequently mitigate impacts on BMV as set out in the ES Volume 1, Chapter 15 – Soils and Agricultural Land [EN0110014/APP/6.15], Planning Statement [EN0110014/APP/7.14] and Design Approach Document [EN0110014/APP/7.17]. The Applicant has considered the economic and other benefits of BMV quality land in line with the policy requirements. The Planning Statement [EN0110014/APP/7.14] describes the following justification for the inclusion of BMV land, while emphasising the substantial wider benefits that the Scheme will bring: • During the initial site selection, no land was identified as likely to be of a lower quality or overall proportionate lower mix of BMV quality land within a reasonable distance of the connection point; • The location of the National Grid Substation, which would result in the permanent loss in BMV quality land, is restricted by its proximity to the existing 400kV overhead line; • During the design evolution BMV quality land has been removed from areas of Solar PV Arrays as far as practicable; • The effects would be mostly temporary and reversible in nature. Taking the Scheme in its entirety, overall, for the majority of land within the Sites of the Order Limits where Solar PV Arrays are proposed, the land currently in arable production would be converted and managed as grassland coverage. This would lead to a temporary residual beneficial effect on soils; • Parcels of land within the Sites have been retained for agricultural use. Whilst other land within the Sites would not be available for arable production, the design of the areas with Solar PV Arrays would be compatible with other farming practices, such as sheep grazing; • Measures have been embedded into the Outline SRMP [EN0110014/APP/7.9] to minimise adverse impacts; and • The Scheme's contribution to meeting the established and urgent need for renewable energy infrastructure, together with the substantial benefits identified in the Planning Statement.
Noise and Vibration		
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	ES Volume 1, Chapter 12 - Noise and Vibration [EN0110014/APP/6.1.12] presents an assessment of the likely significant effects of noise and vibration from the Scheme on noise sensitive receptors based on the existing noise environment and the predicted change in noises levels as a result of the Scheme. The noise sensitive receptors assessed are shown in ES Volume 2, Figure 12.2 Noise and Vibration Sensitive Receptors [EN0110014/APP/6.1.12.2], with the baseline noise levels presented in ES Volume 3,

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	the noise is impulsive, whether the noise contains particular high or low frequency content or any temporal characteristics of the noise; • Identification of noise sensitive receptors and noise sensitive areas that may be affected; • The characteristics of the existing noise environment; • A prediction of how the noise environment will change with the proposed development; - In the shorter term, such as during the construction period; - In the longer term, during the operating life of the infrastructure; - At particular times of the day, evening and night (and weekends) as appropriate, and at different times of year. • An assessment of the effect of predicted changes in the noise environment on any noise-sensitive receptors, including an assessment of any likely impact on health and quality of life / wellbeing where appropriate, particularly among those disadvantaged by other factors who are often disproportionately affected by noise-sensitive areas; • If likely to cause disturbance, an assessment of the effect of underwater or subterranean noise; and • All reasonable steps taken to mitigate and minimise potential adverse effects on health and quality of life.	Appendix 12.1 - Baseline Sound Survey Report [EN0110014/APP/6.3.12.1] and the calculated noise levels in ES Volume 3, Appendix 12.2 Noise Modelling and Calculations [EN0110014/APP/6.3.12.2]. The effects of noise on human health, including consideration of more vulnerable people, is considered in ES Volume 1, Chapter 18 - Other Environmental Matters [EN0110014/APP/6.1.12] and in the Equality Impact Assessment [EN0110014/APP/7.19]. This assessment on human health concludes that overall, with measures in place, the Scheme is not expected to give rise to significant noise or vibration effects on human health or result in disproportionate impacts on vulnerable groups. It is expected that construction works will be undertaken in accordance with the best practicable means (BPM) - as defined in Section 72 of the Control of Pollution Act 1974 (CoPA) to minimise noise and vibration effects. BPM, working practices and monitoring measures have been incorporated into the Outline CEMP [EN0110014/APP/7.1]. The Outline CTMP [EN0110014/APP/7.6] seeks to minimise the number of construction vehicles and, with regard to noise, engines will be switched off when vehicles are not in use to limit unnecessary idling and emissions. If required, the Applicant will seek prior consent for noisy works under Section 61 of CoPA. A Section 61 submission will demonstrate that noise and vibration have been controlled as far as reasonably practicable. Embedded noise measures have also been incorporated into the design though design buffers (offsets) and measures included in the Outline OEMP [EN0110014/APP/7.2]. This includes, for example, a 4m high acoustic fence around the BESS, limits on sound levels at particular noise sensitive receptors and plant specification. The specification of plant machinery with low noise emission and properly attenuated supply and extract terminations will help to minimise noise emissions during the operational phase. The use of enclosures, local screening, mufflers, and silencers will also be used as appropriate. Plant such as the National Grid Substation, Project Substations and BESS will be designed to have minimal tonal, impulsive or intermittent features as far as is practicable. Additional mitigation measures for the operational phase are set out in ES Volume 1, Chapter 12 - Noise and Vibration [EN0110014/APP/6.1.12]. ES Volume 1, Chapter 12 - Noise and Vibration [EN0110014/APP/6.1.12] presents an assessment of noise and vibration effects on human (residential, non-residential uses and PRoW users) for all phases of the Scheme, including from road traffic, in accordance with relevant British Standard and best practice guidance. The assessment concludes negligible to minor adverse effects on noise sensitive receptors, which are considered not significant. An

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		exception to this is up to major adverse effects have been identified in relation to trenchless crossing methods, such as Horizontal Directional Drilling (HDD). Based on guidance provided within BS 5228-2, ES Volume 1, Chapter 12 - Noise and Vibration [EN0110014/APP/6.1.12] concludes that this effect as not to be significant. The noise and vibration assessment concludes that with embedded and additional mitigation measures in place, no significant residual adverse noise effects have been identified across the Scheme's construction, operation and decommissioning phases.
5.12.7	The nature and extent of the noise assessment should be proportionate to the likely noise impact.	The Applicant considers the nature and the extent of the noise assessment is proportionate. The scope has been agreed through the EIA process and, as set out in ES Volume 1, Chapter 12 - Noise and Vibration [EN0110014/APP/6.1.12] , engagement has also taken place with SNC Environmental Health Officer regarding the scope of the noise assessment.
5.12.8	Applicants should consider the noise impact of ancillary activities associated with the development, such as increased road and rail traffic movements, or other forms of transportation.	ES Volume 1, Chapter 12 - Noise and Vibration [EN0110014/APP/6.1.12] considers the predicted noise from the Scheme, including ancillary activities such as traffic generated from the Scheme. Mitigation measures are documented within the: Outline CEMP [EN0110014/APP/7.1], Outline CTMP [EN0110014/APP/7.6] and Outline DEMP [EN0110014/APP/7.3] and are secured via requirements of the draft DCO [EN0110014/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 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.	Construction and decommissioning noise and vibration have been assessed in accordance with BS 5228-1:2009+A1:2014, DMRB LA 111, BS 5228-1:2009+A1:2014, BS 6472-1: 2008 and BS 5228-2:2009+ A1:2014. Operational noise from maintenance and replacement activities, together with operational traffic was scoped out of the assessment. ES Volume 1, Chapter 12 - Noise and Vibration [EN0110014/APP/6.1.12] provides an assessment on the operational noise from Solar PV Arrays, BESS and Substations. These have been assessed in accordance with guidance outlined in BS 4142:2014+A1:2019, BS 8233:2014 and BB93.
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	The Consents and Agreements Position Statement [EN0110014/APP/7.22] 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 [EN0110014/APP/3.1] .

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	surveys and predictions may inform the ecological assessment. The seasonality of potentially affected species in nearby sites may also need to be considered.	The Consultation Report [EN0110014/APP/5.1] states that Natural England did not comment on noise during the consultation. A summary of engagement with South Norfolk Council is provided in ES Volume 1, Chapter 12 - Noise and Vibration [EN0110014/APP/6.1.12] .
5.12.12	Applicants should submit a detailed impact assessment and mitigation plan as part of any development plan, including the use of noise mitigation and noise abatement technologies during construction and operation.	ES Volume 1, Chapter 12 - Noise and Vibration [EN0110014/APP/6.1.12] presents an assessment of noise and vibration effects on human (residential, non-residential uses and PRow users) for all phases of the Scheme, including from road traffic, in accordance with relevant British Standard and best practice guidance. The assessment concludes negligible to minor adverse effects on noise sensitive receptors, which are considered not significant. An exception to this is up to major adverse effects have been identified in relation to trenchless crossing methods, such as Horizontal Directional Drilling (HDD). Based on guidance provided within BS 5228-2, ES Volume 1, Chapter 12 - Noise and Vibration [EN0110014/APP/6.1.12] concludes that this effect as not to be significant. Embedded measures are secured in the Outline CEMP [EN0110014/APP/7.1], Outline CTMP [EN0110014/APP/7.6], Outline OEMP [EN0110014/APP/7.2] and Outline DEMP [EN0110014/APP/7.3]. Embedded noise measures have also been incorporated into the design though design buffers (offsets) and measures included in the Outline OEMP [EN0110014/APP/7.2]. This includes, for example, a 4m high acoustic fence around the BESS, limits on sound levels at particular noise sensitive receptors and plant specification. The specification of plant machinery with low noise emission and properly attenuated supply and extract terminations will help to minimise noise emissions during the operational phase. The use of enclosures, local screening, mufflers, and silencers will also be used as appropriate. Plant such as the National Grid Substation, Project Substations and BESS will be designed to have minimal tonal, impulsive or intermittent features as far as is practicable. Additional mitigation measures for the operational phase are set out in ES Volume 1, Chapter 12 - Noise and Vibration [EN0110014/APP/6.1.12].
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.	
5.12.14	Mitigation measures may include one or more of the following: • Engineering: reducing the noise generated at source and/or containing the noise generated • Lay-out: where possible, optimising the distance between the source and noise-sensitive receptors and/or incorporating good design to minimise noise transmission through the use of screening by natural or purpose-built barriers, or other buildings • Administrative: using planning conditions/obligations to restrict activities allowed on the site at certain times and/or specifying permissible noise limits/noise levels, differentiating as appropriate between different times of day, such as evenings and late at night, and taking into account seasonality of wildlife in nearby designated sites; and • Insulation: mitigating the impact on areas likely to be affected by noise including through noise insulation when the impact is on a building.	

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5.12.15	The project should demonstrate good design through selection of the quietest or most acceptable cost-effective plant available; containment of noise within buildings wherever possible, taking into account any other adverse impacts that such containment might cause (e.g. on landscape and visual impacts; optimisation of plant layout to minimise noise emissions; and, where possible, the use of landscaping, bunds or noise barriers to reduce noise transmission).	It is expected that construction works will be undertaken in accordance with the best practicable means (BPM) - as defined in Section 72 of the Control of Pollution Act 1974 (CoPA) to minimise noise and vibration effects. BPM, working practices and monitoring measures have been incorporated into the Outline CEMP [EN0110014/APP/7.1] , together with other design and management commitments to minimise noise as far as practicable.
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 Volume 1, Chapter 12 - Noise and Vibration [EN0110014/APP/6.1.12] considers where relevant the Noise Policy Statement for England, the NPPF, and the Government's associated planning guidance on noise within its assessment.
5.12.17	The Secretary of State should not grant development consent unless they are satisfied that the proposals will meet the following aims, through the effective management and control of noise: • Avoid significant adverse impacts on health and quality of life from noise; • Mitigate and minimise other adverse impacts on health and quality of life from noise; and • Where possible, contribute to improvements to health and quality of life through the effective management and control of noise.	Embedded noise measures are secured in the Outline CEMP [EN0110014/APP/7.1], Outline CTMP [EN0110014/APP/7.6], Outline OEMP [EN0110014/APP/7.2] and Outline DEMP [EN0110014/APP/7.3]. Offsets, for example, from PRoW have been incorporated into the Design Principles, Parameters and Commitments [EN0110014/APP/7.18]. ES Volume 1, Chapter 12 - Noise and Vibration [EN0110014/APP/6.1.12] concludes negligible to minor adverse effects on noise sensitive receptors, which are considered not significant. An exception to this is up to major adverse effects have been identified in relation to trenchless crossing methods, such as Horizontal Directional Drilling (HDD). Based on guidance provided within BS 5228-2, ES Volume 1, Chapter 12 - Noise and Vibration [EN0110014/APP/6.1.12] concludes that this effect as not to be significant. The effects of noise on human health, including consideration of more vulnerable people, is considered in ES Volume 1, Chapter 18 - Other Environmental Matters [EN0110014/APP/6.1.12] and in the Equality Impact Assessment [EN0110014/APP/7.19]. This assessment on human health concludes that overall, with measures in place, the Scheme is not expected to give rise to significant noise or vibration effects on human health or result in disproportionate impacts on vulnerable groups.
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	Embedded noise measures are secured in the Outline CEMP [EN0110014/APP/7.1] , Outline CTMP [EN0110014/APP/7.6] , Outline OEMP [EN0110014/APP/7.2] and Outline DEMP

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	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.	[EN0110014/APP/7.3]. Offsets, for example, from PRoW have been incorporated into the Design Principles, Parameters and Commitments [EN0110014/APP/7.18]. The Outline OEMP [EN0110014/APP/7.2] sets out that the predicted façade incident rating level of sound at the nearest residential receptors shall not exceed the background sound level. Predicted sound levels along the PRoW will be mitigated, if necessary, not to exceed 55dB(A).
Socio-Economic Impacts		
5.13.2	Where the project is likely to have socio-economic impacts at local or regional levels, the applicant should undertake and include in their application an assessment of these impacts as part of the ES (see Section 4.3).	ES Volume 1, Chapter 14 - Socio-Economics [EN0110014/APP/6.1.14] describes the socio-economic effects during all phases of the Scheme.
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.	Details on the feedback received from consultation including how it has been addressed, are provided in the Consultation Report [EN0110014/APP/5.1] and associated appendices. Further consultation was held with NCC and SNC regarding the Outline ESSCS [EN0110014/APP/7.10] to discuss employment and skill opportunities.
5.13.4	The applicant's assessment should consider all relevant socio-economic impacts, which may include: • The creation of jobs and training opportunities. Applicants may wish to provide information on the sustainability of the jobs created, including where they will help to develop the skills needed for the UK's transition to Net Zero; • The contribution to the development of low-carbon industries at the local and regional level as well as nationally; • The provision of additional local services and improvements to local infrastructure, including the provision of educational and visitor facilities; • Any indirect beneficial impacts for the region hosting the infrastructure, in particular in relation to use of local support services and supply chains; • Effects (positive and negative) on tourism and other users of the area impacted;	ES Volume 1, Chapter 14 - Socio-Economics [EN0110014/APP/6.1.14] describes the socio-economic effects during all phases of the Scheme. This includes an assessment on jobs, employment, skills and supply chain, temporary accommodation from an influx of construction workers and tourism. The assessment considers the effects from the Scheme in isolation together with cumulative schemes. With embedded mitigation, the assessment concludes significant beneficial residual effects on workplace based on jobs, employment and supply chain in South Norfolk, skills and the labour market during the construction and decommissioning phases, together with significant beneficial residual effects on the skills and the labour market during the operational phase. Residual effects on jobs, employment and supply chain across the wider area of Norfolk have also been assessed as beneficial during the construction and operational phases, although not identified as significant. During all phases of the Scheme, residual minor adverse effects have been identified on the temporary accommodation market owing to the influx of workers, which is not significant. There is also the potential for the Scheme to have some disruption to the tourism industry during all phases relating to tourism visits to attractions within immediate proximity of the Order Limits

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	- 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.	associated with reduced amenity value, although this is not assessed to be significant in South Norfolk. No significant adverse cumulative effects on the temporary accommodation market and tourism industry have been identified.
5.13.5	Applicants should describe the existing socio-economic conditions in the areas surrounding the proposed development and should also refer to how the development's socio-economic impacts correlate with local planning policies.	ES Volume 1, Chapter 14 - Socio-Economics [EN0110014/APP/6.1.14] describes the baseline socio-economic conditions relevant to the assessment. The Scheme's compliance with local planning policies is set out within this Policy Compliance Document [EN0110014/APP/7.15].
5.13.6	Socio-economic impacts may be linked to other impacts, for example visual impacts considered in Section 5.10 but may also have an impact on tourism and local businesses. Applicants are encouraged, where possible, to demonstrate that local suppliers have been considered in any supply chain.	ES Volume 1, Chapter 14: Socio-Economics [EN0110014/APP/6.1.14] recognises the multifaceted nature of socio-economics, referring to other impacts, where relevant, such as landscape and visual and traffic impacts, for example. Further, ES Volume 1, Chapter 19 - In-Combination Effects Assessment [EN0110014/APP/6.1.19] considers in-combination effects associated with socio-economics.
5.13.7	Applicants should consider developing accommodation strategies where appropriate, especially during construction and decommissioning phases, that would include the need to provide temporary accommodation for construction workers if required.	ES Volume 1, Chapter 14: Socio-Economics [EN0110014/APP/6.1.14] confirms there are a range of temporary accommodation options within South Norfolk, ranging from rooms in hotels, B&Bs and AirBnBs, for which there is availability.
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.	Embedded measures are incorporated in the Outline ESSCS [EN0110014/APP/7.10]. ES Volume 1, Chapter 14: Socio-Economics [EN0110014/APP/6.1.14] confirms as no significant adverse effects have been identified during any phase of the Scheme once

Relevant Paragraph	Detail	Scheme Compliance
		embedded mitigation is taken into account, no additional mitigation measures for the Scheme are necessary.
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.	With embedded mitigation, ES Volume 1, Chapter 14: Socio-Economics [EN0110014/APP/6.1.14] concludes significant beneficial residual effects on workplace based on jobs, employment and supply chain in South Norfolk, skills and the labour market during the construction and decommissioning phases, together with significant beneficial residual effects on the skills and the labour market during the operational phase. Residual effects on jobs, employment and supply chain across the wider area of Norfolk have also been assessed as beneficial during the construction and operational phases, although not identified as significant.
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).	During all phases of the Scheme, residual minor adverse effects have been identified on the temporary accommodation market owing to the influx of workers, which is not significant. There is also the potential for the Scheme to have some disruption to the tourism industry during all phases relating to tourism visits to attractions within immediate proximity of the Order Limits associated with reduced amenity value, although this is not assessed to be significant in South Norfolk. No significant adverse cumulative effects on the temporary accommodation market and tourism industry have been identified.
5.13.11	The Secretary of State should consider any relevant positive provisions the applicant has made or is proposing to make to mitigate impacts (for example through planning obligations) and any legacy benefits that may arise as well as any options for phasing development in relation to the socio-economic impacts.	As set out in the Outline ESSCS [EN0110014/APP/7.10] the Applicant is committed to apprenticeships in addressing both skill shortages and to provide local residents with pathways into meaningful employment. The Applicant will seek opportunities to collaborate with higher education providers, as well as alongside established initiatives. The Applicant will also explore collaboration with partners to expand capacity in the sustainability sector skills. To raise awareness and aspirations among young people, the Applicant will explore opportunities to deliver targeted outreach activities focused on renewable energy and STEM careers. This may include school talks, curriculum-linked workshops, placements and visits during the construction and operational phases to engage and inspire students. In addition, consideration of other partnerships will be explored by the Applicant to support the training of employees and workers on the Scheme. Where feasible, the Applicant will seek to promote the development of transferable skillsets to aid workers affected by the Scheme to transition to adjacent or related careers. The Applicant will seek opportunities to work with other projects in the area to ensure that employment, skills, and supply chain initiatives are aligned and coordinated, where possible.
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.	
Traffic and Transport		

Relevant Paragraph	Detail	Scheme Compliance
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.	ES Volume 3, Appendix 11.1 - Transport Assessment [EN0110014/APP/6.3.11.1] of ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11] has been prepared in accordance with appropriate guidance including the Ministry of Housing, Communities and Local Government's guidance on Travel Plans, Transport Assessments and Statements in Decision Taking (2014). ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11] 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.
5.14.7	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 11.2 of ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11] and the Consultation Report Appendices [EN0110014/APP/5.12] sets out the comments from these stakeholders, and the Applicant's response.
5.14.8	The applicant should prepare a vision-led approach to identify demand management and monitoring and fall-back measures that proactively mitigate transport impacts, by providing details of proposed measures to improve access by active, public and shared transport to: • Reduce the need for parking associated with the proposal; • Contribute to decarbonisation of the transport network; and • Improve user travel options by offering genuine modal choice.	The Outline CTMP [EN0110014/APP/7.6] provides a Framework Construction Work Travel Plan (FCWTP), which has been prepared to promote sustainable transport for workers during the Scheme's construction phase and is included in the Outline CTMP. The FCWTMP will be developed following the appointment of a Principle Contractor and the final construction programme and workforce requirements are confirmed. A final Construction Worker Travel Plan (CWTP) will be secured as part of the CTMP to be approved pursuant to a Requirement of the DCO. Through the adoption of the CWTP, the Principal Contractor will encourage the workforce and visitors to: • Reduce reliance on travel by private car; • Promote walking, cycling and public transport where feasible, as well as the use of car-sharing and shuttle services; and • Encourage work practices that reduce the need to travel where practicable, such as adopting hybrid working for design and administrative workers. The following FCWTP objectives frame the approach to the detailed CTMP::

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		• Reduce carbon emissions linked to private car travel by promoting sustainable transport modes such as staff minibuses and walking and cycling where it is practicable; • Encourage efficient travel by adopting shared transport modes, in turn reducing the impact and number of private vehicles; • Ensure the CWTP and relevant measures are communicated to workforce members; • Reduce transport impacts from the Scheme on the local community; and • Improve the health and wellbeing of the workforce by promoting the health benefits of active travel. Measures could include: • Staff minibuses; • Travel Plan Co-ordinator whose job is to champion initiatives to reduce the environmental impacts of workforce travel and minimise impacts on the local road network; • Appropriate amount and location of workforce parking.
5.14.9	The assessment should also consider any possible disruption to services and infrastructure (such as road, rail and airports).	ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11] considers the potential disruption to access for local residents and businesses during construction. No other infrastructure will be affected.
5.14.12	Where mitigation is needed, possible demand management measures must be considered. This could include identifying opportunities to: • Reduce the need to travel by consolidating trips; • Locate development in areas already accessible by active travel and public transport; • Provide opportunities for shared mobility; • Re-mode by shifting travel to a sustainable mode that is more beneficial to the network; • Retime travel outside of the known peak times; and • Reroute to use parts of the network that are less busy.	A Framework Construction Worker Travel Plan is provided in Chapter 8 of the Outline Construction Traffic Management Plan (OCTMP) [EN0110014/APP/7.6] and has set out the plan to reduce vehicle impacts associated with construction staff trips on the highway network. This plan encourages the use of sustainable modes of transport, where appropriate, and details measures such as staff shuttle services, provision of parking facilities, and any other proposed measures to reduce mode shift from private car use. A final Construction Worker Travel Plan (CWTP) will be secured as part of the CTMP to be approved pursuant to a Requirement of the DCO.
5.14.13	If feasible and operationally reasonable, such mitigation should be required, before considering requirements for the provision of new inland transport infrastructure to deal with remaining transport impacts. All stages of the project should support and prioritise a modal shift of freight from road to more	Due to the location and dispersed nature of the Site, and construction focussed nature of the transport effects, no new permanent or temporary inland transport infrastructure is proposed. Equipment delivered to Site will be brought to Site by HGV, and then distributed using lighter vehicles, as described in the Outline Construction Traffic Management Plan (OCTMP) [EN0110014/APP/7.6] .

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	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	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.	Th the Outline CTMP [EN0110014/APP/7.6] and the Outline OTMP [EN0110014/APP/7.7] describe how construction and operational freight will access the Site, and the necessary mitigation. These measures include, but are not limited to safety and environment standards programmes, adherence to designated routes, delivery scheduling and monitoring, signage, waiting points and call forward measures, and wheel cleaning facilities. These measures will be adopted where necessary to ensure the safe and effective movement of HGVs and the provision of welfare facilities.
5.14.15	The Secretary of State may attach requirements to a consent where there is likely to be substantial HGV traffic that: - Control numbers of HGV movements to and from the site in a specified period during its construction and possibly on the routing of such movements; - Make sufficient provision for HGV parking, and associated high quality drive facilities either on the site or at dedicated facilities elsewhere, to support driver welfare, avoid 'overspill' parking on public roads, prolonged queuing on approach roads and uncontrolled on-street HGV parking in normal operating conditions; and - Ensure satisfactory arrangements for reasonably foreseeable abnormal disruption, in consultation with network providers and the responsible police force.	The expected trip generation from this Scheme is set out in ES Volume 3, Appendix 11.1 - Transport Assessment [EN0110014/APP/6.3.11.1]. Section 8 of the Outline CTMP [EN0110014/APP/7.6] sets out the Delivery Management mitigation measures. Where practicable, construction deliveries would be co-ordinated to avoid HGV movements during the traditional peak morning (08:00-09:00) and peak afternoon (17:00-18:00) hours. Within the Outline CTMP [EN0110014/APP/7.6], the Outline OTMP [EN0110014/APP/7.7] and the Outline DEMP [EN0110014/APP/7.3], the Applicant has included mitigation measures such as signage to avoid on-street 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 within the Outline CTMP [EN0110014/APP/7.6]. The Outline CTMP [EN0110014/APP/7.6] and the Outline OTMP [EN0110014/APP/7.7] 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 Outline CTMP [EN0110014/APP/7.6] and the Outline OTMP [EN0110014/APP/7.7], for construction and operation phases, respectively. This will help avoid prolonged queuing and uncontrolled on-street parking. Section 6 of the Outline CTMP [EN0110014/APP/7.6] and Section 8 of the Outline OTMP [EN0110014/APP/7.7] outline how ALLs 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. Network providers, including the Local Highways Authority, National Highways have been consulted with regards to the Proposed Development, including relating to the transport effects, as described within the ES

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		Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11] . Where any ALL deliveries require escorts or assistance from the emergency services, 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.
5.14.16	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.	The Applicant's transport and access arrangements, and focus on demand management measures, rather than new transport infrastructure is appropriate, and cost-effective, given the principally construction related (i.e. temporary) traffic effects. This is supported by the assessment within ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11], which describes the existing levels and provides an assessment of the anticipated transport and access effects of the Scheme's construction, operational, and decommissioning phases. ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11] aims to secure more sustainable patterns of transport through mitigation measures which are included within the Outline CEMP [EN0110014/APP/7.1], Outline CTMP [EN0110014/APP/7.6], Outline OEMP [EN0110014/APP/7.2], Outline OTMP [EN0110014/APP/7.7], Outline DEMP [EN0110014/APP/7.3], Outline PRoWPPMP [EN0110014/APP/7.8] and are secured via requirements of the draft DCO [EN0110014/APP/3.1]. The Applicant has provided an Outline PRoWPPM [EN0110014/APP/7.8] which aims to ensure that PRoW, promoted through walking routes and permissive paths, remain open and safe to use throughout the Scheme's Construction, Operational and Decommissioning Phases, where possible. The Outline PRoWPPM [EN0110014/APP/7.8] sets out that the Applicant has proposed three new permissive paths. These permissive paths are proposed to maintain and enhance public access, and will complement the existing PRoW network, providing alternative routes for pedestrians.
5.14.19	A new energy NSIP may give rise to substantial impacts on the surrounding transport infrastructure and the Secretary of State should therefore ensure that the applicant has sought to mitigate these impacts, including during the construction phase of the development and by enhancing active, public and shared transport provision and accessibility.	ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11] concludes that with the mitigation measures from the Outline CEMP [EN0110014/APP/7.1] , Outline CTMP [EN0110014/APP/7.6] , Outline OEMP [EN0110014/APP/7.2] , Outline OTMP [EN0110014/APP/7.7] , Outline DEMP [EN0110014/APP/7.3] , Outline PRoWPPM [EN0110014/APP/7.8] 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 Outline CTMP [EN0110014/APP/7.6] , for mitigating effects associated with construction traffic, including:
5.14.21	Development consent should not be withheld provided that the applicant is willing to enter into planning obligations for funding new infrastructure or requirements can be imposed to mitigate transport impacts. In this situation the Secretary of State	Adherence to designated routes;

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	should apply appropriately limited weight to residual effects on the surrounding transport infrastructure.	• Delivery scheduling and monitoring; • Waiting points; • Signage; • Wheel cleaning.
5.14.22	The Secretary of State should only consider refusing development on highways grounds if there would be an unacceptable impact on highway safety, residual cumulative impacts on the road network would be severe, or it does not show how consideration has been given to the provision of adequate active public or shared transport access and provision.	
Resource and Waste Management		
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 construction of the Scheme will be subject to measures and procedures defined within a detailed CEMP. 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 Outline CEMP [EN0110014/APP/7.1] submitted with the DCO Application. This includes minimising the creation of waste, maximising the use of recyclable materials. A Site Waste Management Plan will be developed as part of the detailed CEMP(s) to ensure waste is managed suitably. Waste is considered in ES Volume 1, Chapter 18 - OEM [APP/6.1.18] 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 OEM will detail collection, separation, sorting, recycling, and recovery of waste arising from the development during operational phase. All waste management will be undertaken in accordance with the relevant guidance and waste would be transported by licensed waste hauliers to waste management sites which hold the necessary regulatory authorisation and/or permits for those wastes consigned to them. This would be achieved by a combination of measures, including: • A detailed Site Waste Management Plan (SWMP) will be prepared before commencement of construction and will be implemented by the contractor, once appointed. • All waste transported off site will be delivered to the appropriately licenced receivers of such materials; • The contractor would segregate construction waste to be re-use and recycled where reasonably practicable.
5.15.7	The applicant should set out the arrangements that are proposed for managing any waste produced and prepare a report that sets out the sustainable management of waste and use of resources throughout any relevant demolition, excavation and construction activities.	
5.15.8	The arrangements described and a report setting out the sustainable management of waste and use of resources should include information on how re-use and recycling will be maximised in addition to the proposed waste recovery and disposal system for all waste generated by the development. They should also include an assessment of the impact of the waste arising from development on the capacity of waste management facilities to deal with other waste arising in the area for at least five years of operation.	
5.15.9	The applicant must consider the Circular Economy and how to ensure that their project aligns with the government’s circular economy ambitions. In Wales applicants are encouraged to refer to ‘Towards Zero Waste: Our Waste Strategy for Wales.	
5.15.11	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	

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	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.	As set out in the Outline CEMP [EN0110014/APP/7.1] , which is secured via requirement of the draft DCO [EN0110014/APP/3.1] , to minimise impacts of waste on the surrounding environment the following measures would be implemented: • 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; • Any waste effluent will be tested and, where necessary, disposed of at a correctly licensed facility by a licensed specialist contractor/s; and • Materials requiring removal from the site will be transported using licensed 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. • Excavated material reuse would be determined via a Resource Management Plan (RMP) in accordance with the CL:AIRE DoW CoP, exemption or environmental permit.
5.15.12	Applicants are also encouraged to prepare a construction materials management plan to inform the use of construction best practices in relation to storing materials in an adequate and protected place on site to prevent waste, or degeneration of valuable materials, for example, from accidental damage or excessive weathering. The use of Building Information Management tools (BIM or similar) to record the materials used in construction can help to reduce waste and realise further value in future decommissioning of facilities, by identifying materials that can be recycled or reused.	
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.	Waste is considered in ES Volume 1, Chapter 18 - OEM [APP/6.1.18] . The construction of the Scheme will be subject to measures and procedures defined within a detailed CEMP. 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 Outline CEMP [EN0110014/APP/7.1] submitted with the DCO Application.
5.15.14	The Secretary of State should be satisfied that: • Any such waste will be properly managed, both on-site and off-site; • The waste from the proposed facility can be dealt with appropriately by the waste infrastructure which is, or is likely to be, available. Such waste arisings should not have an adverse effect on the capacity of existing waste management facilities to deal with other waste arisings in the area; and • Adequate steps have been taken to give consideration to the circular economy, minimise the volume of waste arisings, and of the volume of waste arisings sent for recovery or disposal, except where that is the best overall environmental outcome.	All waste management will be undertaken in accordance with the relevant guidance and waste would be transported by licensed waste hauliers to waste management sites which hold the necessary regulatory authorisation and/or permits for those wastes consigned to them. This would be achieved by a combination of measures, including: • A detailed Site Waste Management Plan (SWMP) will be prepared before commencement of construction and will be implemented by the contractor, once appointed. • All waste transported off site will be delivered to the appropriately licenced receivers of such materials;

Relevant Paragraph	Detail	Scheme Compliance
5.15.15	Where necessary, the Secretary of State should use requirements or obligations to ensure that appropriate measures for waste management are applied.	As set out in the Outline CEMP [EN0110014/APP/7.1] , which is secured via requirement of the draft DCO [EN0110014/APP/3.1] , to minimise impacts of waste on the surrounding environment the following measures would be implemented: • 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; • Any waste effluent will be tested and, where necessary, disposed of at a correctly licensed facility by a licensed specialist contractor/s; and • Materials requiring removal from the site will be transported using licensed 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. • Excavated material reuse would be determined via a Resource Management Plan (RMP) in accordance with the CL:AIRE DoW CoP, exemption or environmental permit.
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.	
Water Quality and Resources		
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 Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9] assesses the anticipated effects on the water environment of the Scheme's construction, operational, and decommissioning in accordance with this policy. The changes to the water environment due to climate change, including potential climate change scenarios relating to flooding and rainfall are also addressed within the assessment.
5.16.4	The applicant should make early contact with the relevant regulators, including the local authority, the EA and Marine Management Organisation, where appropriate, for relevant licensing and environmental permitting requirements. Applicants should make early contact with the EA, NRW and water companies with their proposed water requirements to understand whether water is available and if new water infrastructure is required. If insufficient water is available for abstraction the EA and NRW will be unable to authorise an abstraction licence.	Section 9.2 of ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9] sets out that the Applicant has been in consultation with Anglian Water, the Environment Agency, Natural England, South Norfolk Council and Norfolk County Council (the LLFA) in relation to the water environment. The Applicant has considered the advice provided within the consultation, and taken this into account, as described within Chapter 9. . The pre-application consultation undertaken by the Applicant, and how feedback from consultees has informed the Scheme, is reported in the Consultation Report [EN0110014/APP/5.1] and its Consultation Report Appendices [EN0110014/APP/5.2-5.13] .
5.16.5	Where appropriate, applicants should manage surface water during construction by treating surface water runoff from	The Outline CEMP [EN0110014/APP/7.1] details mitigation to minimise runoff of suspended solids, including:

Relevant Paragraph	Detail	Scheme Compliance
	exposed topsoil prior to discharging and to limit the discharge of suspended solids e.g. from car parks or other areas of hard standing, during operation.	- The mixing and handling of materials would be undertaken in designated areas and away from surface water drains; - Soil bunds and silt traps will be installed to prevent sediment-laden runoff from entering watercourses on steep sections of the Sites as a result of ground level differences during construction of the Project Substations and the BESS; - Where practicable, earthworks will be undertaken during the drier months of the year. When undertaking earth moving works periods of very wet weather will be avoided, where practicable, to minimise the risk of generating runoff contaminated with fine particulates. However, it is likely that some working during wet weather periods will be unavoidable, in which case other mitigation measures (see below) will be implemented to control fine sediment laden runoff. Water may also be required to dampen earthworks during dry weather to reduce dust impacts, and any runoff generated will need to be appropriately managed by the Contractor in accordance with the pollution prevention principles; - To protect watercourses from fine sediment runoff, topsoil/subsoil will be stored a minimum of 30m from watercourses on flat lying land; - Earth stockpiles will be seeded as soon as possible, covered with geotextile mats or surrounded by a bund.
5.16.6	Applicants should avoid locating potentially polluting activities in the most sensitive locations for groundwater, in particular Source Protection Zone 1 (SPZ) and close to nationally important drinking water supplies. Applicants should consider implementing protective measures to control the risk of pollution to groundwater, for example, through the use of protective barriers.	ES Volume 1, Chapter 9 – Water Environment [EN0110014/APP/6.1.9] presents an assessment of the impacts of the Scheme on flood risk, water quality and water resource during the construction, operation and decommissioning phases. This includes consideration of impacts on thermal dynamics (heat pollution), water supplies, Water Resource Zones and SPZ. With embedded design and mitigation, no significant residual adverse effects have been identified within this assessment. This relies on controls embedded within the design of the Scheme and the aforementioned management plans. The surface water drainage arrangements will be subject to further refinement at the detailed design stage.
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	ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9] assesses the impacts of the Scheme on the water environment, and identifies mitigation where appropriate. The assessment includes consideration of water resources, water quality, protected waterbodies, climate change and cumulative effects. The DCO Application is supported by ES Volume 3, Appendix 9.1 - FRA and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1] which considers the potential flooding and drainage issues associated with the Scheme, and the appropriate drainage for mitigating these issues. ES Volume 3, Appendix 9.2 - Water Framework Directive Assessment [EN0110014/APP/6.3.9.2] concludes that the Scheme does not present a risk of deterioration

Relevant Paragraph	Detail	Scheme Compliance
	Strategies) and also demonstrate how proposals minimise the use of water resources and water consumption in the first instance; - Existing physical characteristics of the water environment (including quantity and dynamics of flow) affected by the proposed project and any impact of physical modifications to these characteristics; - Any impacts of the proposed project on water bodies or protected areas (including shellfish protected areas) under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 and source protection zones (SPZs) around potable groundwater abstractions; - How climate change could impact any of the above in the future; and - Any cumulative effects.	of status of Water Framework Directive (WFD) waterbodies or jeopardise the attainment of 'good' overall status of WFD waterbodies.
5.16.8	The Secretary of State should consider whether mitigation measures are needed over and above any which may form part of the project application. A construction management plan may help codify mitigation at that stage.	ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9] assesses the impacts of the Scheme on the water environment, 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 the water environment. The mitigation for residual effects outlined in the assessment rely on controls established within the Outline CEMP [EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2], ES Volume 3, Appendix 9.1 - FRA and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1], and the Outline DEMP [EN0110014/APP/7.3]. These outline management plans and the Outline Surface Water Drainage Strategy set out the water-related measures to manage any potential water effects that may arise from the Scheme's construction, operational and decommissioning phases.
5.16.9	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.	Anglian Water Services has advised that the region is identified as 'seriously stressed' in the EA 2021 classification of water stressed areas and there is a significant risk that water supplies may not be available to meet new non-domestic demands. Consequently, a Water Resources Assessment [EN0110014/APP/6.3.9.3] has been undertaken that considers potable and non-potable water supply options for the Scheme. Water neutrality options have been given priority to reduce the supply requirements. These options include rainwater harvesting, water storage, water tankering (to meet peak demand) and provision of water by Anglian Water. Tankering is the preferred method of embedded mitigation.

Relevant Paragraph	Detail	Scheme Compliance
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 Volume 3, Appendix 9.2 - Water Framework Directive Assessment [EN0110014/APP/6.3.9.2] demonstrates that the Scheme will not have any significant impacts on the WFD elements, including the Anglian River Basin Management Plan, once the mitigation measures are implemented. The Scheme will not result in a significant change from the baseline conditions relating to the overall WFD waterbodies. As demonstrated, this will not result in deterioration of the current WFD water body. The creation of potential new pollutant pathways during the construction phase will be minimised and mitigated through the adoption of best practice techniques and the implementation of CEMP, OEMP and DEMP. The Scheme will not affect the ability for the key actions identified in the Anglian RBMP to be implemented for the catchment. As such, the works are compliant with the WFD and will not prevent the water bodies from achieving 'good' status in the future.
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.	A Water Resources Assessment [EN0110014/APP/6.3.9.3] has been undertaken and considers the effects on water resources, and has been prepared to respond to Anglian Water, and respond to considerations identified in relation to Anglian Water's Water Resources Management Plan 2025-2050 (WRMP24). It concludes that when considering the water supply demand balance, a supply demand balance of zero can be achieved for potable supply under all phases of work with embedded mitigation. Embedded mitigation is also required for a supply demand balance for the non-potable supply of water under all phases of the work.
5.16.17	The Secretary of State should consider proposals to mitigate adverse effects on the water environment and any enhancement measures put forward by the applicant and whether appropriate requirements should be attached to any development consent and/or planning obligations are necessary.	ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9] assesses the impacts of the Scheme on the water environment 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 the water environment. These residual effects outlined in the assessment rely on controls established within the Outline CEMP [EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2], ES Volume 3, Appendix 9.1 - FRA and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1], and the Outline DEMP [EN0110014/APP/7.3]. These outline management plans and the Outline Surface Water Drainage Strategy 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

Relevant Paragraph	Detail	Scheme Compliance
		detailed CEMP(s)) will include details of pre-construction, construction, and post-construction water quality monitoring. The drainage principles are secured through the Design Principles, Parameters and Commitments [EN0110014/APP/7.18] and the measures are set out in the Outline OEMP [EN0110014/APP/7.2] submitted with the DCO Application.

Table 2: National Policy Statement for Renewable Energy Infrastructure (EN-3) December 2025

Relevant Paragraph	Detail	Scheme Compliance
Background		
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 [EN0110014/APP/7.11] 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. The Statement of Need [EN0110014/APP/7.11] 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.
Factors influencing site selection and design		
2.3.1	Factors influencing site selection by applicants for renewable energy generating stations are set out below.	The Site Selection Assessment [EN0110014/APP/7.20] explains the rationale for the location of the Scheme and the extent of the Order Limits. As well as the willingness of landowners, which is a key consideration for site selection, the site selection and evaluation process as reported in the Site Selection Assessment [EN0110014/APP/7.20] considered a number of environmental and planning constraints, together with factors influencing site selection and design, including irradiance and topography, proximity of a site to dwellings, agriculture land classification and land type and accessibility, as set out in paragraph 2.10.10 to 2.10.40 of the NPS EN-3 (and considered in further detail in relation to Section 4 of EN-3 below). ES Volume 1, Chapter 5 - Reasonable Alternatives and Design Evolution [EN0110014/APP/6.1.5] 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
2.3.2	The specific criteria considered by applicants and the weight they give to them will vary from project to project.	
2.3.3	Where there are requirements on applicants or the Secretary of State to consider specific factors, these are made clear in the text.	
2.3.4	The choices which applicants make in selecting sites reflect their assessment of the risk that the Secretary of State, following the general points set out in Section 4.1 of EN-1, will not grant consent in any given case.	

Relevant Paragraph	Detail	Scheme Compliance
2.3.5	It is for applicants to decide what applications to bring forward. In general, the government does not seek to direct applicants to particular sites for renewable energy infrastructure. In specific circumstances it may be appropriate to provide some direction or guidance, for example to areas of search or areas to avoid through Marine Plans, Strategic Environmental Assessments (SEAs) or The Crown Estate Leasing Rounds, in respect of marine renewable technology. All of the examples given consider marine specific aspects of many of the assessment principles set out in Part 4 of EN-1.	the Site Selection Assessment [EN0110014/APP/7.20] , 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.
2.3.6	When considering applications for CNP Infrastructure in sites with nationally recognised designations (such as SSSIs, National Nature Reserves, National Parks, the Broads, National Landscapes, Registered Parks and Gardens, Listed Buildings and Scheduled Monuments, designated Marine Protected Areas (MPAs) and World Heritage Sites), the Secretary of State will take as the starting point that the relevant tests in Sections 5.4 and 5.10 of EN-1 have been met, and any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by the urgent need for this type of infrastructure.	The tests for EN-1 5.4 and 5.1 are considered for individual policies within EN-1 above. There are no national statutory ecological designations within the Order Limits, however, 10 SSSI are located within 5km of the Order Limits. Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] sets out an assessment of the likely effects of the Scheme on SSSI. With embedded measures in place, concludes, no significant residual adverse effects on SSSI. ES Volume 1, Chapter 3 - The Order Limits [EN0110014/APP/6.1.3] confirms that the Order Limits are not covered by any statutory landscape designations, i.e. National Parks or National Landscapes. No Marine Protected Areas are nearby.
2.3.7	The Secretary of State should have regard to the aims, goals and targets (including targets set under the Environment Act 2021) of the government's Environmental Improvement Plan ⁶ , and other existing and future measures and targets in England, as well as Welsh policy, such as the Wales National Marine Plan, Planning Policy Wales and Technical Advice Note (TAN) 5.7 the Wellbeing of Future Generations (Wales) Act 2015 and compliance with the Environment Act 2021.	The Scheme will deliver, as a minimum, 10% BNG, as set out in the Biodiversity Net Gain Report [EN0110014/APP/7.23] . The ecological mitigation and enhancement within the Scheme will deliver a potential net gain of 37.42% for habitats, a net gain of 31.35% for hedgerows and 16.08% for watercourses.
2.3.8	In considering the impact on the historic environment as set out in Section 5.9 of EN-1 and whether the Secretary of State is satisfied that the	With regards to effects on heritage designations, including Registered Parks and Gardens, Listed Buildings and Scheduled Monuments, ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] concludes that following embedded mitigation, there will be no harm to

Relevant Paragraph	Detail	Scheme Compliance
	substantial public benefits would outweigh any loss or harm to the significance of a designated heritage asset, the Secretary of State should take into account the positive role that large-scale renewable projects play in the mitigation of climate change, the delivery of energy security, and the urgency of meeting the Clean Power 2030 Mission and net zero target.	the majority of designated heritage assets and no harm to all the non-designated heritage assets. For two designated heritage assets, Moulton Farmhouse and Barn Cottages Grade II listed buildings, the assessment found minor adverse/negligible effects owing to the change in the settings. The level of harm caused by this impact is considered to be 'less than substantial harm' at the lower end of the scale. For Barn Cottages, this will be reduced to no harm once the landscaping screening has matured. No harm has been identified in relation to 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. Substantial harm to, or total loss of, any designated heritage assets' significance as a result of the Scheme is not anticipated. Therefore, the policy tests regarding substantial harm outlined in Section 5.9 of NPS EN-1 do not apply.
2.3.9	As most renewable energy resources can only be developed where the resource exists and where economically feasible, and because there are no limits on the need established in Part 3 of EN-1, the Secretary of State should not use a consecutive approach in the consideration of renewable energy projects (for example, by giving priority to the re-use of previously developed land for renewable technology developments).	The Site Selection Assessment [EN0110014/APP/7.20] describes the factors considered during the site selection process, including alternative sites for the National Grid Substation, potential development areas for solar (including previously developed land and commercial rooftops) and subsequently considers alternative development zones. Consideration of the alternative development zones against the Scheme show that they perform no better than the land within the Order Limits, and notably the Applicant is not able to demonstrate that such sites are available to participate in the Scheme.
2.3.10	The Secretary of State should also consider spatial plans, such as the Strategic Spatial Energy Plan upon endorsement by all relevant governments.	As described in the Statement of Need [EN0110014/APP/7.11] , the Strategic Spatial Energy Plan, remains under development. However, the Scheme will support the government's objective to deliver a clean power system, which this plan is also intending to support.
Climate Change Adaptation and Resilience		
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.	As set out in ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9] , a sequential approach to the siting of infrastructure has been applied, with infrastructure located outside areas of highest flood risk as far as reasonably practicable. Where elements are located within areas of highest flood risk, these are limited to the Solar PV arrays only, which are raised above ground level on pile-driven steel supports. The supports are of a narrow profile and result in a negligible increase in impermeable area, typically less than 1% of the total Order Limits. The assessment considers the impact from climate change on flooding.

Relevant Paragraph	Detail	Scheme Compliance
		The Design Approach Document [EN0110014/APP/7.17] outlines the adoption of project level design principles to guide decision-making and ensure the integration of good design outcomes into the Scheme. Project Level Design Principle 4.3 is intended to ensure the Scheme is resilient to flooding and does not increase flooding elsewhere. ES Volume 1, Chapter 6 - Climate Change [EN0110014/APP/6.1.6] 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 Outline CEMP [EN0110014/APP/7.1] and Outline OEMP [EN0110014/APP/7.2].
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.	The responses to Section 4.7 of EN-1 are provided above. As detailed in the Planning Statement [EN0110014/APP/7.14], good design has been a fundamental consideration from the outset of the Scheme.
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 Design Approach Document [EN0110014/APP/7.17] 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 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 [EN0110014/APP/6.1.6-18]. The Works Plan [EN0110014/APP/2.3] and the Design Principles, Parameters and Commitments [EN0110014/APP/7.18] secure the design of the Scheme through the draft DCO [EN0110014/APP/3.1].
Flexibility in the project details		
2.6.1	Where details are still to be finalised, applicants should explain in the application which elements of	

Relevant Paragraph	Detail	Scheme Compliance
	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 Volume 1, Chapter 4 - The Scheme [EN0110014/APP/6.1.4] .
2.6.2	Where flexibility is sought in the consent as a result, applicants should, to the best of their knowledge, assess the likely worst- case environmental, social and economic effects of the proposed development to ensure that the impacts of the project as it may be constructed have been properly assessed.	The Applicant's approach to EIA, including the use of the Rochdale envelope to assess effects, is set out in ES Volume 1, Chapter 2 - EIA Methodology [EN0110014/APP/6.1.2]. 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 [EN0110014/APP/3.1] and are spatially shown in the Works Plan [EN0110014/APP/2.3] and a number of control documents, as listed within the Guide to the Application [EN0110014/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.
2.6.3	Full guidance on how applicants and the Secretary of State should manage flexibility is set out in Section 4.3 of EN-1.	The Applicant's response to these matters is also addressed EN-1 4.3.10-12 above.
Solar Photovoltaic Generation		
2.10.5	Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation.	As explained in the Statement of Need [EN0110014/APP/7.11] the Scheme will be a substantial renewable infrastructure asset, which if consented will deliver large amounts of cheap, secure and low-carbon electricity. ES Volume 1, Chapter 6 - Climate Change [EN0110014/APP/6.1.6] sets out that the Scheme could provide enough electricity to power around 115,000 homes per year. This represents a significant contribution towards delivery of the government's energy objectives and target of net zero by 2050. For the purposes of assessment, as outlined in ES Volume 1, Chapter 6 - Climate Change [EN0110014/APP/6.1.6], renewable energy generation from the Scheme during the first year of operation is estimated to be approximately 667,760 MWh/year. To account for product

Relevant Paragraph	Detail	Scheme Compliance
		degradation, a 2% degradation factor for the first year has been applied, followed by a 0.45% degradation factor for each subsequent year. This results in an estimated energy generation figure of 600,214 MWh in the final year of operation. The total energy generated by the Scheme would be around 36.33 TWh over the 60-year Scheme operation phase.
2.10.6	Solar farms can be built quickly and, coupled with consistent reductions in the cost of materials and improvements in the efficiency of panels, large-scale solar is now viable in some cases to deploy subsidy-free.	As explained in the Statement of Need [EN0110014/APP/7.11] , the Scheme will deliver large amounts of cheap, secure, and low carbon electricity and has the potential to be operational by 2031. The Scheme is being developed subsidy free, and is entirely privately funded, as described within the Funding Statement [EN0110014/APP/4.2] .
2.10.7	Solar farm proposals are currently likely to consist of solar panel arrays, mounting structures, piles, inverters, transformers and cables.	The elements of the Scheme for which consent is sought are set out in Schedule 1 of the draft DCO [EN0110014/APP/3.1] , the Design Principles, Parameters and Commitments [EN0110014/APP/7.18] and the Works Plan [EN0110014/APP/2.3] . A description of the Scheme is also set out in ES Volume 1, Chapter 4 - The Scheme [EN0110014/APP/6.1.4] .
2.10.8	Associated infrastructure may also be proposed and may be treated, on a case by case basis, as associated development, such as energy storage, electrolyzers associated with the production of low carbon hydrogen, <u>flood defences</u> or security arrangements (which may encompass flood defences, fencing, lighting and surveillance).	The Scheme includes associated infrastructure as set out within the relevant Work No's of the draft DCO [EN0110014/APP/3.1] . The full description of the Scheme is set out in ES Volume 1, Chapter 4 - The Scheme [EN0110014/APP/6.1.4] and displayed on the Works Plan [EN0110014/APP/2.3] .
2.10.9	Along with associated infrastructure, a solar farm currently requires between 2 to 41.6 and 2.25 hectares (4-5.6 acres) for each MW of output. A typical 50MW solar farm will consist of around 100,000 to 150,000 panels and cover between 125 to 200 acres. However, this will vary significantly depending on the site, with some being larger and some being smaller. This is also expected to change over time as the technology continues to evolve to become more efficient. Nevertheless, this scale of development will inevitably have impacts, particularly if sited in rural areas.	The efficient use of land is addressed within the Planning Statement [EN0110014/APP/7.14] under the heading of Overplanting. The illustrative design for the Scheme shows a layout which is more land efficient than that range, at under 3 acres per MW (excluding land for environmental mitigation). However, while MW(p) is an important measure in relation to the maximum power which can be generated from a scheme, it is not the only metric by which the decarbonisation and energy security benefits brought forwards by solar schemes can or should be measured. The Overplanting section within Planning Statement addresses wider considerations, including the grid balancing services provided by the BESS.
Irradiance and site topography		

Relevant Paragraph	Detail	Scheme Compliance
2.10.11	Irradiance will be a key consideration for the applicant in identifying a potential site as the amount of electricity generated on site is directly affected by irradiance levels. Irradiance of a site will in turn be affected by surrounding topography, with an uncovered or exposed site of good elevation and favourable south-facing aspect more likely to increase year-round irradiance levels. This in turn affects the carbon emission savings and the commercial viability of the site.	As outlined in ES Volume 1, Chapter 5 - Reasonable Alternatives and Design Evolution [EN0110014/APP/6.1.5] Norfolk represents a good location within the UK to construct a solar farm as the area benefits from higher levels of irradiance compared to other parts of the UK. Flat or gently south-facing slopes are most suitable and beneficial for solar energy generation. A generally flat or gently undulating topography is most suitable for solar energy from both a constructability and operational perspective, ensuring that the Order Limits can produce a large amount of electricity.
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.	These factors have influenced the focus on the Norfolk area as the preferred location of the Scheme. The general topography surrounding the Order Limits 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.
Network connection		
2.10.13	Applicants should consider important issues relating to network connection at Section 4.11 of EN-1 and in EN-5. In particular, and where appropriate, applicants should proceed in a manner consistent with the regulatory regime for offshore transmission networks established by Ofgem, details of which are set out in EN-5.	As outlined in ES Volume 1, Chapter 5 - Reasonable Alternatives and Design Evolution [EN0110014/APP/6.1.5] - The Applicant engaged with National Grid Company plc (NGC) in 2022 to discuss available capacity within its transmission network within the Norfolk area for integrating a 500MW solar utility-scale solar generating project. Consideration was initially given to a Point of Connection (PoC) at the existing Norwich Main Substation. However, National Grid advised that there was neither sufficient existing capacity at the Norwich Main Substation nor an opportunity to expand this existing substation to accommodate a 500MW solar project. Given this, the Norwich Main Substation was discounted as a viable PoC. Following these discussions, it was identified by National Grid that there was available capacity along the Bramford to Norwich 400kV line between Diss and Norwich and that a new National Grid Substation would be required to connect the Scheme to the grid.
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.	A grid connection offer was subsequently received which contracted the Applicant to provide the land and gain consent for the proposed new National Grid Substation. Further information on the grid connection agreement can be found in the Grid Connection Statement [EN0110014/APP/7.12] . As set out in the Grid Connection Statement [EN0110014/APP/7.12] the Applicant has:
2.10.15	Larger developments may seek connection to the transmission network if there is available network capacity and/or supportive infrastructure.	
2.10.16	In either case the connection voltage, availability of network capacity, and the distance from the solar farm to the existing network can have a significant	

Relevant Paragraph	Detail	Scheme Compliance
	effect on the commercial feasibility of a development proposal.	- The Applicant has received a valid grid connection offer from NESO to connect the Scheme to the NETS along the overhead electrical transmission line via a new National Grid Substation referred to as the New Long Stratton 400kV Substation. - The Applicant has accepted this grid offer by entering into a BCA with NESO. This demonstrates that the grid connection is technically viable. - The Applicant has also undertaken electrical design for the Scheme including reviewing suitable siting and location of substations and the works required to connect to the existing overhead transmission line; and - A single 400kV circuit will run from the on-site 400kV Project Substations to the new National Grid Substation, which will allow the Scheme to connect to the NETS.
2.10.17	To maximise existing grid infrastructure, minimise disruption to existing local community infrastructure or biodiversity and reduce overall costs, applicants may choose a site based on nearby available grid export capacity.	The Site Selection Assessment [EN0110014/APP/7.20] presents the reasoning behind the Site's selection, which includes the siting of the proposed new National Grid Substation.
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 Volume 1, Chapter 2 - EIA Methodology [EN0110014/APP/6.1.2], a Cumulative Effects Assessment (CEA) has been undertaken as part of the EIA in accordance with PINS Advice on Cumulative Effects Assessment (September 2024). The grid infrastructure which is needed to enable the Scheme is part of the Scheme, so is not assessed as a cumulative effect. An assessment of the cumulative effects of the Scheme in combination with other development, including energy generating stations and infrastructure is set out in ES Volume 1, Chapter 6 to 18 [EN0110014/APP/6.1.6 – 6.1.18]. These assessments conclude significant adverse cumulative effects in relation to hazardous waste void capacity. In addition, the following significant beneficial cumulative effects have been identified in relation to: - Water environment in relation to the cessation of agricultural use and fertiliser application; and - Socio-economics in relation to jobs, employment and the supply chain in South Norfolk, Norfolk and East of England and skills in South Norfolk during construction, and jobs, employment and the supply chain and skills in South Norfolk during the operation phase.
Proximity of a site to dwellings		
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	ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7] 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 Volume 3, Appendix 7.8 - Residential Visual Amenity Assessment [EN0110014/APP/6.3.7.8], which considered the effects on residential visual amenity.

Relevant Paragraph	Detail	Scheme Compliance
	(paragraphs 2.10.85- 2.10.93) and Glint and Glare (paragraphs 2.10.94 – 2.10.98) impact sections of this NPS.	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 Volume 2, Figure 7.9 - Residential Receptors Plan [EN0110014/APP/6.2.7.9] .
Agriculture land classification and land type		
2.10.20	Solar is a highly flexible technology and as such can be deployed on a wide variety of land types.	The Site Selection Assessment [EN0110014/APP/7.20] presents the reasoning behind the Site's selection. ES Volume 1, Chapter 5 - Reasonable Alternatives and Design Evolution [EN0110014/APP/6.1.5] explains that the use of previously developed (brownfield) land within 20km of the proposed National Grid Substation site was considered. The Applicant conducted a review of the brownfield registers (prepared by South Norfolk and Broadland District Council, Breckland Council, Mid Suffolk District Council, and East Suffolk Council) and found no suitable previously developed sites that covered a sufficient area to accommodate a 500MW utility-scale solar project. Consideration was given to commercial rooftops within the 20km search area. However, no commercial rooftops or combined premises of an adequate area to facilitate a 500MW utility-scale solar project or provide a viable network of sites in proximity to the POC were identified. Achieving this capacity would require securing agreements with a large number of land ownerships over an extensive geographic area, making the Scheme unviable.

Relevant Paragraph	Detail	Scheme Compliance
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 (ALC).	Agricultural Land Classification (ALC) is an important factor for the Applicant when evaluating the site. Land within the Order Limits includes areas of BMV quality land. Previously developed land and BMV quality land has been considered as part of the site selection process as set out in the Site Selection Assessment [EN0110014/APP/7.20]. The results of the ALC surveys and impacts of the Scheme on BMV land is provided in ES Volume 1, Chapter 15 - Soils and Agricultural Land [EN0110014/APP/6.1.15]. Along with many factors, BMV quality land was a consideration in the design evolution of the Scheme. During the design process, the Applicant sought to, where practicable, reduce the use of BMV quality land within the Solar PV Array areas, including for example, removal of pockets of BMV quality land from the Solar PV Arrays within Site 3, Sub-Site 5B, Site 6 and Sub-Site 8A during the design process. Sub-Site 3A was entirely removed from the Order Limits owing to several factors, including its agricultural land quality (largely Grade 2). Such examples are set out in the Design Approach Document [EN0110014/APP/7.17].
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 2.10.67 – 84 and 2.10.99 – 2.10.118 of this NPS.	ES Volume 1, Chapter 15 - Soils and Agricultural Land [EN0110014/APP/6.1.15] sets out an assessment which demonstrates that the effects of the Scheme being on BMV land have been considered. 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 NETS. The decommissioning measures set out in the Outline DEMP [EN0110014/APP/7.3] are secured by the draft DCO [EN0110014/APP/3.1].
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.	Previously developed land and BMV quality land has been considered as part of the site selection process as set out in the Site Selection Assessment [EN0110014/APP/7.20] . Existing land classification and productivity has been surveyed ALC surveys and discussions with the landowners over the quality and viability of agricultural land. Further detail on the results of the ALC surveys and impacts of the Scheme on BMV land is provided in ES Volume 1, Chapter 15 - Soils and Agricultural Land [EN0110014/APP/6.1.15] .
2.10.24	Where sited on agricultural land, consideration may be given as to whether the proposal allows for	As is described within ES Volume 1, Chapter 15 - Soils and Agricultural Land [EN0110014/APP/6.1.15] , parcels of land within the Sites have been retained for agricultural use.

Relevant Paragraph	Detail	Scheme Compliance
	continued agricultural use and/or can be co-located with other functions (for example, onshore wind generation, storage, hydrogen electrolyzers) to maximise the efficiency of land use.	Whilst other land within the Sites would not be available for arable production, the design of the areas with Solar PV Arrays would be compatible with other farming practices, such as sheep grazing.
2.10.25	(The ALC) is the only approved system for grading agricultural quality in England and Wales and, if necessary, field surveys should be used to establish the ALC grades in accordance with the current, or any successor to it, grading criteria and identify the soil types to inform soil management at the construction, operation, and decommissioning phases in line with the Defra Construction Code. Applicants should refer to Natural England guidance, or any successor to it, for more information about the assessment process for development proposals on agricultural land.	The methodology for assessment, including consideration of soil type are described in ES Volume 1, Chapter 15 - Soils and Agricultural Land [EN0110014/APP/6.1.15] this has been undertaken with consideration of Natural England's guidance, in particular with regards to the classification of ALC grades.
2.10.26	Applicants are encouraged to develop and implement a Soil Resources and Management Plan which could help to use and manage soils sustainably and minimise adverse impacts on soil health and potential land contamination. This should be in line with the ambition set out in the Environmental Improvement Plan to bring at least 40% of England's agricultural soils into sustainable management by 2028 and increase this up to 60% by 2030. This should include consideration of mitigation against impacts to peat soils where these are present.	The Applicant has provided an Outline SRMP [EN0110014/APP/7.9] which sets out how soil will be handled, monitored, and restored during the lifetime of the Scheme. The Outline SRMP [EN0110014/APP/7.9] is secured via a requirement of the draft DCO [EN0110014/APP/3.1]. ES Volume 1, Chapter 15 - Soils and Agricultural Land [EN0110014/APP/6.1.15] sets out that by following the measures within the Outline SRMP [EN0110014/APP/7.9], no significant residual effects have been identified.
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.	ES Volume 1, Chapter 15 - Soils and Agricultural Land [EN0110014/APP/6.1.15] sets out that the economic benefits of the land within the Scheme are about £190,000 per annum, but this is negligible on a regional basis, which is not significant. The food production benefits are estimated at around 1,000 tonnes per annum incremental production benefit, which is negligible on a regional and national scheme. ES Volume 1, Chapter 15 - Soils and Agricultural Land [EN0110014/APP/6.1.15] sets out the following embedded mitigation during each phase of the Scheme to minimise damage to soil structure:

Relevant Paragraph	Detail	Scheme Compliance
		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 mostly 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; - Minimising trench widths, replacing soils in the reverse order and preventing any adverse long-term effects on land quality; and - Following the advice set out in the OSRMP. Operation and Maintenance: - Following the same timing principles as are to be applied at the Construction Phase; and - Implementation of the OSRMP [EN0110014/APP/7.9]. Decommissioning: - Following the same timing principles as are to be applied at the Construction Phase; and - Implementation of the OSRMP [EN0110014/APP/7.9].
Accessibility		
2.10.27	Applicants will need to consider the suitability of the access routes to the proposed site for both the construction and operation of the solar farm with the former likely to raise more issues.	ES Volume 3, Appendix 11.1 - Transport Assessment [EN0110014/APP/6.3.11.1] of ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11] 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 Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11] 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. The Outline CTMP [EN0110014/APP/7.6] provides details of the construction vehicle routes to each of the proposed access points. Construction vehicle routes have been selected with the principal aim for avoiding routeing vehicles through local villages, wherever possible, including the villages of Great Moulton, Long Stratton, Hempnall, Saxlingham Nethergate and Brooke. The
2.10.28	Given that potential solar farm sites are largely in rural areas, access for the delivery of solar arrays and associated infrastructure during construction can be a significant consideration for solar farm siting.	
2.10.29	Developers will usually need to construct on-site access routes for operation and maintenance activities, such as footpaths, earthworks, or landscaping.	

Relevant Paragraph	Detail	Scheme Compliance
2.10.30	In addition, sometimes access routes will need to be constructed to connect solar farms to the public road network.	selected routes are considered the most appropriate to each access point and have been prepared based on engagement with the NCC and NH.
2.10.31	Applications should include the full extent of the access routes necessary for operation and maintenance and an assessment of their effects.	The Access and Rights of Way Plan [EN0110014/APP/2.7] demonstrates the changes to pedestrians and cyclist access.
Public rights of ways		
2.10.32	Proposed developments may affect the provision of public rights of way networks.	The Applicant has provided an Outline PRoWPPMP [EN0110014/APP/7.8] which sets out measures to mitigate the impact of the Scheme on public rights of way networks.
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 4 of the Outline PRoWPPMP [EN0110014/APP/7.8] sets out what PRoWs and Permissive Paths may be impacted by the Scheme and proposes a variety of management measures such as: • Signage will be installed along the PRoW to inform users about construction activity. The signs will provide information on construction times and contact details for a public liaison officer; • Drivers must yield to all PRoW users, including equestrians; • Where applicable, access tracks will be widened to allow vehicles to pass PRoW users safely; • Traffic Marshals or Banksman will be positioned where relevant along a PRoW impacted by construction traffic, to hold vehicles if a PRoW user is present and advise PRoW users of the potential for construction vehicles; • Speeds to be limited to 5-10mph near PRoW; • The PRoW will be kept clear of construction vehicles and apparatus outside of permitted construction hours so far as is practicable to do so; and • Any damage to the surface of the PRoW directly attributable to the Scheme will be repaired as soon as practicable. The surface will be made good and returned to its original condition following construction.
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 layout of the Scheme, and alignment of existing PRoW within the Order Limits has been incorporated into the design of the Scheme. The Design Approach Document [EN0110014/APP/7.17] sets out project level design principles and design offset buffers which were considered within the design process, together with how the design has evolved to respond to the landscape and visual context. The hierarchical mitigation approach adopted has been to: • Avoid where practicable, effects through the overall design and layout of the Scheme; • Reducing effects as far as practicable through the Green Infrastructure Strategy; and

Relevant Paragraph	Detail	Scheme Compliance
		Additional mitigation through the compensation of potential losses. However, for the Scheme, no additional mitigation has been identified. Embedded mitigation within the Scheme is described in ES Volume 1, Chapter 7 – Landscape and Visual [EN0110014/APP/6.17]. In accordance with the mitigation hierarchy, the design has focused on avoiding environmental constraints as far as practicable. This has included developing buffers (offsets) to existing green infrastructure assets to retain and protect key landscape features, offsets from PRoW. For these reasons, the alignment and use of PRoW is anticipated to be unaffected during operation of the Scheme.
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	A PRoW Visual Amenity Assessment has been prepared, set out in ES Volume 3, Appendix 7.9 - Public Rights of Way Visual Amenity Assessment [EN0110014/APP/6.3.7.9] . The assessment relates to the impacts on users of recreational resources comprising PRoW, including public footpaths; bridleways; restricted byways; and Byways Open to All Traffic (BOAT) within the Order Limits. It considers the physical changes (e.g. PRoW diversions or closures) and effects to visual amenity, which may contribute to the overall experience of these recreational resources. Where potential likely effects are identified, appropriate mitigation is proposed such as linear tree belt planting.
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.	As described within Appendix 7.9 - Public Rights of Way Visual Amenity Assessment [EN0110014/APP/6.3.7.9], as part of the Scheme, three new permissive paths are proposed to maintain and enhance public access. These permissive paths will complement the existing PRoW network, providing alternative routes for pedestrians. The permissive paths are to remain open up to 365 days per year throughout the 60-year operational lifetime of the Scheme. The new permissive paths will include pedestrian only routes supported by necessary access features, along with fencing, gates and boundary treatments where required. Signage and interpretation boards will be provided to aid route awareness, and the paths will be accompanied by landscaping and biodiversity measures, including planting.
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 4 of the Outline PRoWPPMP [EN0110014/APP/7.8] sets out what PRoWs and Permissive Paths may be impacted by the Scheme and proposes a variety of management measures such as; - Signage will be installed along the PRoW to inform users about construction activity. The signs will provide information on construction times and contact details for a public liaison officer; - Drivers must yield to all PRoW users, including equestrians; - Where applicable, access tracks will be widened to allow vehicles to pass PRoW users safely;

Relevant Paragraph	Detail	Scheme Compliance
		- Traffic Marshals or Banksmen will be positioned where relevant along a PRoW impacted by construction traffic, to hold vehicles if a PRoW user is present and advise PRoW users of the potential for construction vehicles; - Speeds to be limited to 5-10mph near PRoW; - The PRoW will be kept clear of construction vehicles and apparatus outside of permitted construction hours so far as is practicable to do so; and - Any damage to the surface of the PRoW directly attributable to the Scheme will be repaired as soon as practicable. The surface will be made good and returned to its original condition following construction. Where there is a requirement need to temporarily close or divert the PRoW, works may be undertaken outside of standards construction working hours, so far as is practicable to do so, as PRoW user numbers will be low. The PRoW will remain open, and managed, during the daytime period wherever practicable.
Security and lighting		
2.10.38	Security of the site is a key consideration for developers. Applicants may wish to consider not only the availability of natural defences such as steep gradients, hedging and rivers but also perimeter security measures such as fencing, electronic security, CCTV and lighting, with the measures proposed on a site-specific basis.	The Design Principles, Parameters and Principles [EN0110014/APP/7.18] sets out that during operation; a perimeter fence will enclose the operational area of the Scheme. Perimeter fencing would be in place throughout the Solar PV Arrays. It is likely to comprise deer wire mesh with wooden posts, at a maximum height of 2.5m. The BESS, Conversion Units, Substations and 33kV Sub-distribution Switch Rooms would be surrounded by palisade fencing, likely at a maximum height of 3m Pole-mounted, internal-facing CCTV systems will be installed around the perimeter of the Sites. It is anticipated that these would be galvanised steel poles painted green, with a maximum height of 3m. Motion sensing security lighting would be provided within the Substation, the National Grid Substation, and within the BESS Compound to maintain safe working conditions in winter months, for security purposes, and for maintenance activities. A lighting strategy has been undertaken to set out the Scheme approach to lighting. This includes measures to minimise light intrusion and effects on landscape and visual receptors in the context of the Scheme which has limited light sources, as set out in ES Volume 3, Appendix 7.11 Lighting Strategy [EN0110014/APP/6.3.7.11].
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.	
2.10.40	Applicants should consider the need to minimise the impact on the landscape and the visual impact of security measures.	

Relevant Paragraph	Detail	Scheme Compliance
		ES Volume 3, Appendix 7.11 Lighting Strategy [EN0110014/APP/6.3.7.11] sets out how the visual impact of security measures will be minimised. This includes measures such as controls through photocell and motion sensing lighting at the Project Substation and BESS, linked to security cameras.
Technical Considerations - Capacity of a site		
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 electrolyzers associated with the production of low carbon hydrogen.	The Applicant has secured a connection offer to export the electricity produced from the Scheme of 500MW (AC) through a new National Grid Substation. It also allows for the import of 500MW (AC) of electrical energy to be stored in an Energy Storage Facility (for the purposes of the DCO Application, this is assumed to employ battery technology and is therefore referred to as the BESS). This is set out further in the Grid Connection Statement [EN0110014/APP/7.12] . The Applicant does not propose a limit on the generating capacity of the Scheme in the DCO Application. This is because the environmental effects associated with the Scheme are determined by the relevant design parameters, rather than by generating capacity.
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).	As set out in the Statement of Need [EN0110014/APP/7.11] 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.
2.10.45	For the purposes of <u>section 15</u> 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.	
2.10.47	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.	

Relevant Paragraph	Detail	Scheme Compliance
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		
2.10.52	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 Volume 1, Chapter 5 - Reasonable Alternatives and Design Evolution [EN0110014/APP/6.1.5] and the Site Selection Assessment [EN0110014/APP/7.20] 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. The Design Approach Document [EN0110014/APP/7.17] 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. The Works Plan [EN0110014/APP/2.3] and the Design Principles, Parameters and Commitments [EN0110014/APP/7.18] secure the design of the Scheme through the draft DCO [EN0110014/APP/3.1].
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 Volume 1, Chapter 4 - The Scheme [EN0110014/APP/6.1.4], 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 Panels or Fixed Solar PV Panels for the Scheme. The Single Axis Tracker panels will be aligned in north south rows, and incline to the east or west up to a maximum inclination of 60 degrees from horizontal and the Fixed panels will be aligned in east west rows, and slope towards the south at a fixed slope of 10 to 35 degrees from horizontal as set out in the Design Principles, Parameters and Commitments [EN0110014/APP/7.18].
2.10.54	In terms of design and layout, applicants may favour a south-facing arrangement of panels to maximise output although other orientations may be chosen for alternative reasons, such as to match peaks in demand. For example, an east-west layout, whilst	As set out in ES Volume 1, Chapter 4 - The Scheme [EN0110014/APP/6.1.4], 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.

Relevant Paragraph	Detail	Scheme Compliance
	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.	
2.10.55	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 Volume 1, Chapter 4 - The Scheme [EN0110014/APP/6.1.4] describes the works required for the Scheme. Works that include cabling are: • Work No. 1: comprising works in connection with a ground mounted solar PV generating station, including 33kV Sub-Distribution Switch Rooms, Conversion Units (Inverters, Transformers, Switchgear) and cabling connecting to the Project Substations; • Work No. 2: comprising the works in connection with the energy storage facility (BESS), including Conversion Units, monitoring and control systems, cabling connecting to the 400kV Project Substation and acoustic barriers; • Work No. 3: comprising works in connection with the 132kV Project Substations and 400kV Project Substations; • Work No. 4: comprising works in connection with the new National Grid Substation, including security and monitoring measures, landscaping and biodiversity measures, sustainable drainage systems, together with works in connection with access and temporary construction compounds; • Work No. 6: comprising works in connection with laying electrical cables of up to 132kV and 400kV connecting to the Project Substations and National Grid Substation, together with laying down access tracks and temporary construction compounds; and • Work No. 7: comprising works including fencing, security and monitoring measures, landscaping and biodiversity measures, access tracks, PRoW diversions, earthworks, sustainable drainage systems, acoustic barriers, cabling and temporary construction compounds. The Design Principles, Parameters and Commitments [EN0110014/APP/7.18] and the Outline Construction Methodology section in the Outline Cable Route Construction Statement [EN0110014/APP/7.21] sets out further detail on the parameters for the cabling, including the cable design and installation for each of the works areas listed in the draft DCO [EN0110014/APP/3.1]. The Design Principles, Parameters and Commitments [EN0110014/APP/7.18] sets out that there will be works to modify, reconfigure and dismantle the existing overhead line to connect the National Grid Substation to the existing overhead line. Cabling will be underground in the Cable Route Corridor to connect the Sites to the National Grid Substation, and there will also be cabling across the Sites. This is also set out in the Works Plan [EN0110014/APP/2.3].
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.	

Relevant Paragraph	Detail	Scheme Compliance
		As set out in the Design Principles, Parameters and Commitments [EN0110014/APP/7.18] and the Outline Cable Route Construction Statement [EN0110014/APP/7.21] , 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 or up to 2m below existing buried utilities or apparatus. Where land is unconstrained by an obstacle and returned to agricultural use, the cable depth would be a minimum of 1.2m below ground level.
Technical Considerations - Project Lifetime		
2.10.57	Applicants should consider the design life of solar panel efficiency over time when determining the period for which consent is required. An upper limit of 40 years is typical, although applicants may seek consent without a time-period or for differing time-periods of operation.	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 2091. A requirement to decommission the Scheme is secured via a requirement in the draft DCO [EN0110014/APP/3.1] .
2.10.58	Time limited consent, where granted, is described as temporary because there is a finite period for which it exists, after which the project would cease to have consent and therefore must seek to extend the period of consent or be decommissioned and removed.	
2.10.59	Solar panel efficiency deteriorates over time and applicants may elect to replace panels during the lifetime of the site.	ES Volume 1, Chapter 4 - The Scheme [EN0110014/APP/6.1.4] 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. Mitigation measures associated with the programme of replacement activities will be outlined within the Outline OEMP [EN0110014/APP/7.2].
2.10.143	The Secretary of State should consider the period of time the applicant is seeking to operate the	As set out in ES Volume 1, Chapter 4 - The Scheme [EN0110014/APP/6.1.4] , when the operation and maintenance phase ends, the Solar PV Site would be decommissioned and the land returned

Relevant Paragraph	Detail	Scheme Compliance
	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.	to the landowner. When the operation and maintenance phase ends, the Sites would be decommissioned and the land returned to the landowner. All infrastructure, including Solar PV Panels, Mounting Structures, above ground cabling, Conversion Units / 33 kV sub-distribution Switch Rooms, 132 kV Project Substations, 400 kV Project Substations and, BESS would be removed from within the Sites and recycled or disposed of in accordance with good practice and market conditions at that time. This will include the areas of agricultural land and established habitats where the soil health, quality and structure may have improved. Foundations and other below ground infrastructure will be cut to 1.2 m below the surface to enable future ploughing. Any piles would be removed. 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 in ES Volume 2, Figure 4.1 - Indicative Masterplan [EN0110014/APP/6.2.4.1] and the Green Infrastructure Strategy within the Outline LEMP [EN0110014/APP/7.7], 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 the relevant planning authority in accordance with the Outline DEMP [EN0110014/APP/7.3]. The effects of decommissioning, which are often similar to, or of a lesser magnitude than, construction effects, are considered in ES Topic Chapters [EN0110014/APP/6.1].
Decommissioning		
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.	An Outline DEMP [EN0110014/APP/7.3] 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 [EN0110014/APP/3.1] includes a requirement that a detailed Decommissioning Strategy would be prepared substantially in accordance with the Outline DEMP and approved by the relevant planning authority at the time of decommissioning, in advance of the commencement of decommissioning works, and would include timescales and transportation methods. As set out in ES Volume 1, Chapter 4 - The Scheme [EN0110014/APP/6.1.4], when the operation and maintenance phase ends, the Solar PV Site would be decommissioned and the land returned

Relevant Paragraph	Detail	Scheme Compliance
		to the landowner. When the operation and maintenance phase ends, the Sites would be decommissioned and the land returned to the landowner. All infrastructure, including Solar PV Panels, Mounting Structures, above ground cabling, Conversion Units / 33 kV sub-distribution Switch Rooms, 132 kV Project Substations, 400 kV Project Substations and, BESS would be removed from within the Sites and recycled or disposed of in accordance with good practice and market conditions at that time. This will include the areas of agricultural land and established habitats where the soil health, quality and structure may have improved. Foundations and other below ground infrastructure will be cut to 1.2 m below the surface to enable future ploughing. Any piles would be removed. 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 ES Volume 2, Figure 4.1 - Indicative Masterplan [EN0110014/APP/6.2.4.1] and the Green Infrastructure Strategy within the Outline LEMP [EN0110014/APP/7.7], 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 the relevant planning authority in accordance with the Outline DEMP [EN0110014/APP/7.3]. The effects of decommissioning, which are often similar to, or of a lesser magnitude than, construction effects, are considered in ES Topic Chapters (Chapter 6-18) [EN0110014/APP/6.1.6-18].
2.10.138	The Secretary of State should ensure that the applicant has put forward outline plans for decommissioning the generating station when no longer in use and restoring the land to a suitable use (taking into account paragraphs 2.10.60 and 2.10.61).	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 2091. A requirement to decommission the Scheme is secured via a requirement in the draft DCO [EN0110014/APP/3.1] .
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.	

Relevant Paragraph	Detail	Scheme Compliance
2.10.141	An upper limit of 40 years is typical, although applicants may seek consent without a time period or for differing time-periods for operation.	
2.10.142	The time limited nature of the solar farm, where a time limit is sought as a condition of consent, is likely to be an important consideration for the Secretary of State.	
2.10.140	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.	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 2091. A requirement to decommission the Scheme is secured via a requirement in the draft DCO [EN0110014/APP/3.1] .
Flexibility in the Project Details		
2.10.63	In many cases, not all aspects of the proposal may have been settled in precise detail at the point of application. Such aspects may include: - the type, number and dimensions of the panels; - layout and spacing; - the type of inverter or transformer; and - whether storage will be installed (with the option to install further panels as a substitute).	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 Volume 1, Chapter 4 - The Scheme [EN0110014/APP/6.1.4]. 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 pursuant to the requirements in the draft DCO [EN0110014/APP/3.1] and must be in accordance with the Works Plan [EN0110014/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.

Relevant Paragraph	Detail	Scheme Compliance
		As set out in the Statement of Need [EN0110014/APP/7.11] 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.
Biodiversity, ecological, geological conservation and water management		
2.10.68	The applicant's ecological assessments should identify any ecological risk from developing on the proposed site.	ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] 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 Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] 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. Moderate beneficial effects are anticipated during operation on the following - • Native hedgerows and tree lines • Ponds • Rivers • Lowland Deciduous Woodland • Scrub • Other neutral grassland • Ditches • Breeding Birds • Skylark • Badgers • Water Vole and Otters. The expected residual beneficial effects outlined in ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.2] rely on controls established in the Outline CEMP
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.	

Relevant Paragraph	Detail	Scheme Compliance
		[EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2], Outline DEMP [EN0110014/APP/7.3] and the Outline LEMP [EN0110014/APP/7.4] and are secured via corresponding requirements of the draft DCO [EN0110014/APP/3.1].
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 Stantec UK Ltd (see ES Volume 3, Appendix 1.2 - Statement of Expertise [EN0110014/APP/6.3.1.2]) to ensure that adverse impacts are avoided, minimised or mitigated in line with the mitigation hierarchy, and biodiversity enhancements are maximised.
2.10.71	The assessment may be informed by a 'desk study' of existing ecological records, an evaluation of the likely impacts of the solar farm upon ecological features, and should specify mitigation to avoid or minimise these impacts, and any further surveys required.	ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] 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. The expected residual beneficial effects outlined in ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1] rely on controls established in the Outline CEMP [EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2], Outline DEMP [EN0110014/APP/7.3] and the Outline LEMP [EN0110014/APP/7.4] and are secured via corresponding requirements of the draft DCO [EN0110014/APP/3.1] .
2.10.72	Applicants should consider earthworks associated with construction compounds, access roads and cable trenching.	ES Volume 1, Chapter 4 - The Scheme [EN0110014/APP/6.1.4] provides details on the works required for construction, including installation of cables, construction compounds and access roads which may require earthworks.
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.	The Outline SRMP [EN0110014/APP/7.9] sets out details of how the soils will be managed and protected during the construction, operation and maintenance and decommissioning of the Scheme. This includes soil handling methods including soil stripping methods, soil moisture conditions for handling, preparatory works, topsoil stripping methods and subsoil stripping methods. Stockpiling, reinstatement methods, and monitoring procedures during construction are also set out. A detailed Outline SRMP will be secured by a requirement in the draft DCO [EN0110014/APP/3.1] .
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 Volume 1, Chapter 4 - The Scheme [EN0110014/APP/6.1.4] sets out that during operation; a perimeter fence will enclose the operational area of the Scheme. Perimeter fencing would be in place throughout the Solar PV Arrays. It is likely to comprise deer wire mesh with wooden posts, at a maximum height of 2.5m. It is expected that the final location of the fencing will be finalised as part of the detailed design which would be secured through a requirement in Schedule 2 of the DCO. ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] outlines the mitigation measures relevant to biodiversity that are embedded in the Scheme and which will be

Relevant Paragraph	Detail	Scheme Compliance
		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.
2.10.75	Applicants should consider how site boundaries are managed. If any hedges/scrub are to be removed, further surveys may be necessary to account for impacts. Buffer strips between perimeter fencing and hedges may be proposed, and the construction and design of any fencing should account for enabling mammal, reptile and other fauna access into the site if required to do so in the ecological report.	The ES [EN0110014/APP/6.1 – 6.4] 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 Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] and secured through the Design Principles, Parameters, and Commitments [EN0110014/APP/7.18] .
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 Volume 3, Appendix 9.1 - FRA & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1] which considers flood risk throughout each stage of development, potential sources of flooding, and assesses the risk of flooding to the Scheme. This also considers the need for and impact of existing and proposed drainage. It concludes that the Scheme is safe and will not detrimentally impact on flood risk within the Order Limits or elsewhere, in accordance with the requirements of national and local planning policy.
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.	The ES Volume 3, Appendix 9.1 - FRA and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1] outlines how surface water runoff from the Site will be managed in accordance with national, regional, and local guidance regarding flood risk and drainage. Surface water runoff from the Solar PV will be managed through 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.
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.	The Scheme's design evolution has sought to avoid relevant Important Ecological Features, such as hedgerows, watercourses and woodlands, as far as practicable. This includes the design buffers in the Design Principles, Parameters and Commitments [EN0110014/APP/7.18] and Works Plan [EN0110014/APP/6.1.8] , for example ditches have been buffered to 10m.
2.10.79	Culverting existing watercourses/drainage ditches should be avoided.	ES Volume 3, Appendix 9.1 - FRA and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1] indicates access tracks will be required to facilitate vehicle movement around the Order Limits for construction, operation and maintenance, and decommissioning purposes. Where practicable, existing field accesses will be utilised for access between field parcels and existing agricultural tracks will remain accessible for agricultural and habitat management activities over the operational lifetime of the Scheme. Therefore, the requirement for road/watercourse crossings will be limited.
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.	

Relevant Paragraph	Detail	Scheme Compliance
		There will also be vehicles transporting equipment along the Cable Route Corridor for the cable installation and for the launch and reception pits. Where practicable, these temporary internal haul routes will be designed to avoid impacts on watercourses. Where this is not practicable, temporary construction access ramps would be used for these crossings. This will take of the following forms, which are listed in order of least to most impact and are likely to be appropriate, respectively, for the most to least sensitive features: • Temporary access construction ramps that do not interfere with the channel (banksides, bed or water column); or • Temporary access construction ramps with in-stream supports or pre-cast structures with natural bed; or • Temporary construction access ramps with closed culverts with artificial invert. Where closed culverts are utilised, these will be designed with consideration of whether they will be temporary or permanent to ensure that they have sufficient capacity for flows both in present-day and considering climate change. The type of crossing selected for the temporary construction access ramps will be determined at detailed design in consultation with the relevant local authority, which is secured through the Outline CEMP [EN0110014/APP/7.1]. These haul routes will be removed following installation of the cables and the land fully reinstated back to its original use.
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 biodiversity net gain, which result in wider environmental gains which is encouraged.	As presented in the BNG Report [EN0110014/APP/7.23], the ecological mitigation and enhancement areas are predicted to provide a net gain of 37.42% for onsite habitats, and a net gain of 31.35% for onsite hedgerow and tree lines while a requirement of the draft DCO [EN0110014/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.
2.10.82	For projects in England, applicants should consider enhancement, management, and monitoring of biodiversity in line with the ambition set out in any reasonable opportunities to maximise restoration, creation, and enhancement of wider biodiversity. This may include considerations and opportunities identified through Local Nature Recovery Strategies,	

Relevant Paragraph	Detail	Scheme Compliance
	and national goals and targets set through the Environment Act 2021 and the Environmental Improvement Plan.	
2.10.120	In England, proposed enhancements should take account of the above factors and as set out in Sections 4.6 and 5.4 of EN-1 aim to achieve environmental and biodiversity net gain in line with the ambition set out in the Environmental Improvement Plan and any relevant measures and targets, including statutory targets set under the Environment Act 2021 or elsewhere.	
2.10.121	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.	The Outline LEMP [EN0110014/APP/7.4] , secured through the draft DCO [EN0110014/APP/3.1] , sets out measures proposed to maintain, extend and create new habitats. These include extensive tree, woodland and hedgerow planting and restoration of ghost ponds where practicable.
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 Outline CEMP [EN0110014/APP/7.1] , Outline OEMP [EN0110014/APP/7.2] , Outline DEMP [EN0110014/APP/7.3] and the Outline LEMP [EN0110014/APP/7.4] , which are secured via corresponding requirements of the draft DCO [EN0110014/APP/3.1] .
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 Volume 1, Appendix 9.1 to 9.3 - FRA and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3] details how water and drainage will be managed as part of the Scheme. ES Volume 1, Chapter 15 - Soils and Agriculture [EN0110014/APP/6.1.15] outlines how the Scheme may result in beneficial effects to soils by leaving the land undisturbed under long-term grassland. Soil health, quality and structure within the Sites are likely to improve during the lifetime of the scheme.
2.10.147	The Secretary of State must consider the worst-case effects in its consideration of the application and consent.	ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9] assess the worst-case effects of the Scheme on the water environment 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 the water environment.

Relevant Paragraph	Detail	Scheme Compliance
Landscape, Visual and Residential Amenity		
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.	ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7] provides an assessment of the Scheme's impact on landscape and visual within the Order Limits, or that will be impacted by the Scheme, including a consideration of cumulative effects. ES Volume 1, Chapter 5 - Reasonable Alternatives and Design Evolution [EN0110014/APP/6.1.5] 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 the Site Selection Assessment [EN0110014/APP/7.20] 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.
2.10.87	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.	ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7] outlines the embedded mitigation proposed to minimise landscape and visual effects (reducing the impact on the zone of visual influence), including, but not limited to, advanced planting, mature hedgerow retention, new woodland creation, hedgerow and tree planting, and the establishment of grassland/wildflower areas.
2.10.88	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.	Landscape designations were considered in the site selection process as set out in the Site Selection Assessment [EN0110014/APP/7.20] and the landscape and visual context of the Order Limits in the design approach to the Scheme described in the Design Approach Document [EN0110014/APP/7.17]. ES Volume 1, Chapter 3 - The Order Limits [EN0110014/APP/6.1.3] confirms that There are no statutory landscape designations covering the Order Limits, nor are there any within 5km of the Order Limits. The Design Approach Document [EN0110014/APP/7.17] also sets out project level design principles and design offset buffers which were considered within the design process, together with how the design has evolved to respond to the landscape and visual context. The hierarchical mitigation approach adopted has been to: • Avoid where practicable, effects through the overall design and layout of the Scheme; • Reducing effects as far as practicable through the Green Infrastructure Strategy; and • Additional mitigation through the compensation of potential losses. However, for the Scheme, no additional mitigation has been identified.

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2.10.89	Applicants should carry out a landscape and visual assessment (LVIA) and report it in the ES. Photomontage visualisations may be required to demonstrate the effects of a proposed solar farm, on sensitive or valued landscapes, particularly designated landscapes, the setting of heritage assets and any nearby residential areas or viewpoints.	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 Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7]. Photowire and visualisations are presented in: • Figure 7.7 - View Locations and Visualisations [EN0110014/APP/6.2.7.7] • Appendix 7.5 - Photosheets [EN0110014/APP/6.3.7.5] • Appendix 7.6 - Visualisations [EN0110014/APP/6.3.7.6]
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 level design 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 the Planning Statement [EN0110014/APP/7.14] and the Design Approach Document [EN0110014/APP/7.17]. 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 Outline LEMP [EN0110014/APP/7.4], Outline CEMP [EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2], and the Outline DEMP [EN0110014/APP/7.3] which would be secured via corresponding requirements of the draft DCO [EN0110014/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.
2.10.91	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 above 2.10.38 – 2.10.40 of this NPS).	As described in ES Volume 1, Chapter 4 - The Scheme [EN0110014/APP/6.1.4] to assist the assessment and ensure good design, scheme outcomes and project level design principles have been developed to guide (within the parameters) the size, type and colour of elements of the Scheme. ES Volume 1, Chapter 4 -The Scheme [EN0110014/APP/6.1.4] sets out that during operation; a perimeter fence will enclose the operational area of the Scheme. Perimeter fencing would be in place throughout the Solar PV Arrays. It is likely to comprise deer wire mesh with wooden posts, at a maximum height of 2.5m. It is expected that the final location of the fencing will be finalised as

Relevant Paragraph	Detail	Scheme Compliance
		part of the detailed design which would be secured through a requirement in Schedule 2 of the DCO. The BESS, Conversion Units, Project Substations and 33kV Sub-distribution Switch Rooms would be surrounded by palisade fencing, likely at a maximum height of 3m Pole-mounted, internal-facing CCTV systems will be installed around the perimeter of the Sites. It is anticipated that these would be galvanised steel poles painted green, with a maximum height of 3m. 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 [EN0110014/APP/3.1]. The maximum height of the security fencing is 3m, as secured in the Design Principles, Parameters and Commitments [EN0110014/APP/7.18].
2.10.92	The applicant should consider as part of the design, layout, construction, and future maintenance plans how to protect and retain, wherever possible, the growth of vegetation on site boundaries, as well as the growth of existing hedges, established vegetation, including mature trees within boundaries. Applicants should also consider opportunities for individual trees within the boundaries to grow on to maturity.	Landscape and ecological enhancements and mitigation measures for the Scheme are shown in the Outline LEMP [EN0110014/APP/7.4] . Measures are secured in the Outline LEMP [EN0110014/APP/7.4] 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.
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 consider the impact on existing trees and hedgerows, this is provided within ES Volume 3, Appendix 7.10 - Preliminary Arboriculture Impact Assessment [EN0110014/APP/6.3.7.10] .
2.10.123	Applicants should consider the potential to mitigate landscape and visual impacts through, for example, screening with native hedges, trees and woodlands.	ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7] outlines the embedded mitigation proposed for landscape and visual considerations, including, but not limited to, planting, mature hedgerow retention, new woodland creation, hedgerow and tree planting, and the establishment of grassland/wildflower areas.
2.10.124	Applicants should aim to minimise the use and height of security fencing. Where possible applicants should utilise existing features, such as	Design Principles, Parameters and Commitments [EN0110014/APP/7.18] includes a commitment to 'Retain and enhance existing vegetation, where possible, and features of value to retain the fabric of the Sites and aid the integration of the Scheme within the environment and the characteristics of the surroundings, as far as practicable.'

Relevant Paragraph	Detail	Scheme Compliance
	hedges or landscaping, to assist in site security, or screen security fencing.	ES Volume 1, Chapter 4 - The Scheme [EN0110014/APP/6.1.4] sets out that during operation; a perimeter fence will enclose the operational area of the Scheme. Perimeter fencing would be in place throughout the Solar PV Arrays. It is likely to comprise deer wire mesh with wooden posts, at a maximum height of 2.5m. It is expected that the final location of the fencing will be finalised as part of the detailed design which would be secured through a requirement in Schedule 2 of the DCO. The BESS, Conversion Units, Substations and 33kV Sub-distribution Switch Rooms would be surrounded by palisade fencing, likely at a maximum height of 3m Pole-mounted, internal-facing CCTV systems will be installed around the perimeter of the Sites. It is anticipated that these would be galvanised steel poles painted green, with a maximum height of 3m. 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 [EN0110014/APP/3.1]. The maximum height of the security fencing is 3m, as secured in the Design Principles, Parameters and Commitments [EN0110014/APP/7.18].
2.10.125	Applicants should minimise the use of security lighting. Any lighting should utilise a passive infrared (PIR) technology and should be designed and installed in a manner which minimises impact.	ES Volume 3, Appendix 7.11 - Lighting Strategy [EN0110014/APP/6.3.7.11] 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 [EN0110014/APP/7.18].
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 and their settings (National Parks, The Broads and National Landscapes) are afforded extra protection due their statutory purpose. Development in these areas needs to satisfy policy as set out in EN-1 Section 5.10.	ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7] provides an assessment of the Scheme's impact on landscape and visual receptors, identifying construction, operational phases (short, medium, and long term), and decommissioning effects. ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7] 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 Volume 1, Chapter 3 - The Order Limits [EN0110014/APP/6.1.3] confirms that the Order Limits are not covered by any statutory landscape designations, i.e. National Parks or National Landscapes.

Relevant Paragraph	Detail	Scheme Compliance
Glint and Glare		
2.10.95	Applicants should map receptors qualitatively to identify potential glint and glare issues and determine if a glint and glare assessment is necessary as part of the application.	As set out in ES Volume 3, Appendix 2.1 - East Pye EIA Scoping Report [EN0110014/APP/6.3.2.1] and agreed by PINS in ES Volume 3, Appendix 2.2 - East Pye EIA Scoping Opinion [EN0110014/APP/6.3.2.2] , an individual Glint and Glare chapter is not required in the ES.
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.	ES Volume 1, Chapter 18 - OEM [EN0110014/APP/6.1.18] 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 Volume 3, Appendix 18.1 - Glint and Glare Assessment [EN0110014/APP/6.3.18.1]. ES Volume 1, Chapter 18 - OEM [EN0110014/APP/6.1.18] 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.
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.	ES Volume 3, Appendix 18.1 - Glint and Glare Assessment [EN0110014/APP/6.3.18.1] states that the Scheme would utilise either Single-Axis Tracker Panels and/or Fixed Panels. The assessment has considered both fixed panels and single-axis tracking (SAT) 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 Volume 3, Appendix 18.1 - Glint and Glare Assessment [EN0110014/APP/6.3.18.1] has considered the effects associated with the Scheme as a whole.
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.	ES Volume 3, Appendix 18.1 - Glint and Glare Assessment [EN0110014/APP/6.3.18.1] considered solar panels with a surface material of 'smooth glass with an anti-reflective coating. Advance planting and hedgerow enhancement may be undertaken and is described within the Outline LEMP [EN0110014/APP/7.11].
2.10.127	Applicants may consider using screening between potentially affected receptors and the reflecting panels to mitigate the effects.	The Glint and Glare section of ES Volume 1, Chapter 18 - OEM [EN0110014/APP/6.1] considers both fixed and tracker panel options, as either type of panel may constitute the worst-case scenario.

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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.	Fixed panels are assessed with an azimuth angle 180 degrees, south facing. The tracking panels would be aligned in north-south rows and would rotate to the east and west to maximise output, whereas the fixed panels would be aligned in east-west rows and secured to fixed south facing Solar PV Tables. ES Volume 1, Chapter 18 - OEM [EN0110014/APP/6.1.18] 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.
2.10.150	Solar PV panels are designed to absorb, not reflect, irradiation. However, the Secretary of State should assess the potential impact of glint and glare on nearby homes, motorists, public rights of way, and aviation infrastructure (including aircraft departure and arrival flight paths).	ES Volume 1, Chapter 18 - OEM [EN0110014/APP/6.1.18] 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 Volume 3, Appendix 18.1 - Glint and Glare Assessment [EN0110014/APP/6.3.18.1]. The assessment 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.
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 Volume 1, Chapter 18 - OEM [EN0110014/APP/6.1.18] informed by ES Volume 3, Appendix 18.1 - Glint and Glare Assessment [EN0110014/APP/6.3.18.1], has assessed the effects of glint and glare upon aviation activity. The High Level Investigate Report [EN0110014/APP/7.24] and Potential Impact on Seething Aerodrome Forced Landing Options [EN0110014/APP/7.28] explore aviation related effects resulting from the Scheme, and conclude no significant risks when best practice is followed. Where appropriate, changes have been made to the Scheme to accommodate for aviation-based constraints as set out in the Design Approach Document [EN0110014/APP/7.17].
Historic Environment		
2.10.99	The impacts of solar PV developments on the historic environment will require expert assessment in most cases and may have effect both above and below ground.	ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] 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.
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.	ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] 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: Outline CEMP [EN0110014/APP/7.1] , Outline CTMP [EN0110014/APP/7.6] , Outline

Relevant Paragraph	Detail	Scheme Compliance
		OEMP [EN0110014/APP/7.2], Outline DEMP [EN0110014/APP/7.3], and Outline LEMP [EN0110014/APP/7.4] and are secured via requirements of the draft DCO [EN0110014/APP/3.1] .
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.	ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] 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.
2.10.102	Equally, solar PV developments may have a positive effect, for example heritage assets may be protected by a solar PV farm as the site is removed from regular ploughing and shoes or low-level piling is stipulated.	
2.10.104	Applicant assessments should be informed by information from Historic Environment Records (HERs) or the local authority.	ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] 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.
2.10.105	Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, the applicant should submit an appropriate desk-based assessment and, where necessary, a field evaluation. These should be carried out using expertise where necessary and in consultation with the LPA, and should identify archaeological study areas and propose appropriate schemes of investigation, and design measures, to ensure the protection of relevant heritage assets.	ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] 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 3 [EN0110014/APP/6.3] : • Appendix 10.1 - Heritage Statement • Appendix 10.2 - Archaeological DBA • Appendix 10.3 - Geophysical Survey • Appendix 10.4 - Aerial Photograph Survey • Appendix 10.5 - Evaluation Trenching Report • Appendix 10.6 - Archaeological Mitigation Strategy.
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 heritage assets.	
2.10.107	The extent of investigative work should be proportionate to the sensitivity of, and extent of,	

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	proposed ground disturbance in the associated study area.	
2.10.108	Applicants should take account of the results of historic environment assessments in their design proposal.	As detailed in the Planning Statement [EN0110014/APP/7.14] , good design has been a fundamental consideration from the outset of the Scheme.
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.	The Design Approach Document [EN0110014/APP/7.17] 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 to guide decision making and embed good design outcomes to the Scheme.
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.	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 Level Design Principle 2.7 states that the Scheme will 'Consider the setting of heritage assets and mitigate any impact by design, where practicable.'
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.	ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] 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 Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] 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: Outline CEMP [EN0110014/APP/7.1], Outline CTMP [EN0110014/APP/7.6], Outline OEMP [EN0110014/APP/7.2], Outline DEMP [EN0110014/APP/7.3], and Outline LEMP [EN0110014/APP/7.4] and are secured via requirements of the draft DCO [EN0110014/APP/3.1]
2.10.130	Where requested by the applicant, the Secretary of State should consider granting consents which allow for the microsite within a specified tolerance of elements of the permitted infrastructure, so that precise locations can be amended during the construction phase if unforeseen circumstances, such as the discovery of previously unknown archaeology, arise.	As described in ES Volume 3, Appendix 10.6 - Archaeological Mitigation Strategy [EN0110014/APP/6.3], 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 NCCHEs. 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

Relevant Paragraph	Detail	Scheme Compliance
		assessment. Once details are available the need for and scope of any geoarchaeological assessment will be agreed with NCCHEs. and implemented in accordance with the AMS. The AMS will be secured via requirement of the draft DCO [EN0110014/APP/3.1]. The mitigation strategy is summarised in ES Volume 3, Appendix 10.6 - Archaeological Mitigation Strategy [EN0110014/APP/6.3].
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 2091. A requirement to decommission the Scheme is secured via a requirement in the draft DCO [EN0110014/APP/3.1] . The assessment within ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1] has been carried out for the 60-year design life of the Scheme.
Construction including Traffic and Transport noise and vibration		
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 delivery and assemblage of the necessary components.	The locations of the temporary construction compounds are shown on the Works Plan [EN0110014/APP/2.3] and the parameters for the temporary construction compounds are set out in the DPPC [EN0110014/APP/7.18] - which explains the different maximum parameters for each type of construction compound. As described in the Outline Cable Route Construction Statement [EN0110014/APP/7.21], there will also be construction laydown areas. The temporary construction compounds would comprise: • areas of hardstanding; • car parking; • site and welfare offices and workshops; • security infrastructure, including cameras, perimeter fencing and lighting; • area to store materials and equipment; • site drainage and waste management infrastructure (including sewerage); and • electricity, water, waste water and telecommunications connections. These laydown areas will allow construction vehicles to turn off the public highway and park safely. The laydown areas will take into consideration topography, drainage, heritage and environmental constraints. Activities at these laydown areas will include receipt of deliveries, unloading, provision of welfare facilities, portacabins (office space) and storage of plant, construction materials and power generators.

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		It is anticipated that goods would be delivered by HGV to the construction compound and then distributed to the point of need within the Order Limits using lighter vehicles (e.g. tractor and trailer) as required.
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.	The Outline CTMP [EN0110014/APP/7.6] provides details of the construction vehicle routes to each of the proposed access points. Construction vehicle routes have been selected with the principal aim for avoiding routeing vehicles through local villages, wherever possible, including the villages of Great Moulton, Long Stratton, Hempnall, Saxlingham Nethergate and Brooke. The selected routes are considered the most appropriate to each access point and have been prepared based on engagement with the NCC and NH.
2.10.114	Generic traffic and transport impacts are covered Section 5.14 of EN-1.	The Outline CTMP [EN0110014/APP/7.6] provides details on delivery scheduling, the approach is intended to reduce the likelihood of HGVs meeting in opposing directions of narrow sections of the LRN, helping to minimise potential conflict and congestion and maintain road safety.
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.	ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11] 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 Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11] aims to secure more sustainable patterns of transport through mitigation measures which are included within the Outline CEMP [EN0110014/APP/7.1], Outline CTMP [EN0110014/APP/7.6], Outline OTMP [EN0110014/APP/7.7], Outline OEMP [EN0110014/APP/7.2], Outline DEMP [EN0110014/APP/7.3], Outline PRoWPPMP [EN0110014/APP/7.8] and are secured via requirements of the draft DCO [EN0110014/APP/3.1].
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.	ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11] , states Trip generation figures are indicative and representative of activities at each the Sites occurring simultaneously. Whilst this is highly unlikely to occur in the Construction Phase as construction activities will be staggered to reduce impacts on the highway network, it has been included as a means of assessing a reasonable worst-case scenario
2.10.117	Applicants should ensure all sections of roads and bridges on the proposed delivery route can accommodate the weight and volume of the loads and width of vehicles. Although unlikely, where modifications to roads and/or bridges are required, these should be identified, and potential effects addressed in the ES.	The needs of freight at all stages are covered within the Outline CTMP [EN0110014/APP/7.6] and the Outline OTMP [EN0110014/APP/7.7] and the Outline DEMP [EN0110014/APP/7.3] . 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.

Relevant Paragraph	Detail	Scheme Compliance
		The expected trip generation from this Scheme is set out in ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11]. The Outline CTMP [EN0110014/APP/7.6] provides details on delivery scheduling, the approach is intended to reduce the likelihood of HGVs meeting in opposing directions of narrow sections of the LRN, helping to minimise potential conflict and congestion and maintain road safety. Both the Outline CTMP [EN0110014/APP/7.6] and the Outline OTMP [EN0110014/APP/7.7] outlines how AILs will be for managed to avoid disruption during to the network. Application for notification of AIL deliveries must be made by transport (haulage) 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. All AIL movements will be managed by a specialist haulage contractor to ensure safety and compliance. Traffic management arrangements will be agreed in advance with NH, LHA and other relevant local highway authorities, structures' owners and the Police, where necessary, before any AIL movements take place.
2.10.118	Where a cumulative impact is likely because multiple energy infrastructure developments are proposing to use a common port and/or access route and pass through the same towns and villages, applicants should include a vision-led transport assessment to manage cumulative impacts as part of the ES. This should consider the impacts of abnormal traffic movements relating to the project in question in combination with those from any other relevant development. Consultation with the relevant local highways authorities is likely to be necessary.	ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11] concludes no significant adverse effects following an assessment of the effects generated by the Scheme or cumulative effects from other planned or approved schemes on the same receptor (presented in ES Volume 1, Chapter 2 - EIA Methodology [EN0110014/APP/6.1.2]) Network providers, including the Local Highways Authority, National Highways have been consulted with regards to the Proposed Development, including relating to the transport effects, as described within the ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11]
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 routing of such movements particularly by heavy vehicles.	The Outline CTMP [EN0110014/APP/7.6] sets out measures required to control any impacts from construction traffic, including AIL Routing, delivery routes and scheduling. The Applicant does not consider that any additional requirements need to be imposed by the Secretary of State on the Scheme.

Relevant Paragraph	Detail	Scheme Compliance
2.10.132	Where the Secretary of State agrees that this is necessary, requirements could be imposed on development consent.	
2.10.133	Where cumulative effects on the local road network or residential amenity are predicted from multiple solar farm developments, it may be appropriate for applicants for various projects to work together to ensure that the number of abnormal loads and deliveries are minimised, and the timings of deliveries are managed and coordinated to ensure that disruption to residents and other highway users is reasonably minimised.	ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11] concludes no significant adverse effects following an assessment of the effects generated by the Scheme and other planned or approved schemes on the same receptor (presented in ES Volume 1, Chapter 2 - EIA Methodology [EN0110014/APP/6.1.2]). Both the Outline CTMP [EN0110014/APP/7.6] and the Outline OTMP [EN0110014/APP/7.7] outlines how AILs will be for managed to avoid disruption during to the network. Application for notification of AIL deliveries must be made by transport (haulage) 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. All AIL movements will be managed by a specialist haulage contractor to ensure safety and compliance. Traffic management arrangements will be agreed in advance with NH, LHA and other relevant local highway authorities, structures' owners and the Police, where necessary, before any AIL movements take place. Liaison and agreement with NCC on transport and traffic mitigation is set out in Sections of the Outline CTMP [EN0110014/APP/7.6], including the following: - Section 6 provides details of the construction vehicle routes to each of the proposed access points. Construction vehicle routes have been selected with the principal aim for avoiding routeing vehicles through local villages, wherever possible, including the villages of Great Moulton, Long Stratton, Hempnall, Saxlingham Nethergate and Brooke. The selected routes are considered the most appropriate to each access point and have been prepared based on engagement with the NCC and NH. Prior to the commencement of any works on or adjacent to the public highway, the detail design of the works will be submitted to and approved by the LHA adhering to the relevant consenting regime. Further information will be included as part of a detailed CTMP or separately, and will include: - Programme of works, method statement and traffic management proposals; - Detailed technical drawings; - Any health and safety documentation required under the CDM Regulations;
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.	
2.10.135	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.	
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.	

Relevant Paragraph	Detail	Scheme Compliance
		• Stage 1/2 Safety Audit; and • Details of the Contractor. The detailed CTMP will confirm the process and relevant departments at NCC with which the detailed design drawings will be issued to and approved. ES Volume 1, Chapter 4 - The Scheme [EN0110014/APP/6.1.4] sets out that the Scheme includes highways works such as improvements to road edges and temporary works to accommodate AIL deliveries.
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 Outline OTMP [EN0110014/APP/7.7] 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 Outline OTMP [EN0110014/APP/7.7] continues to state that larger HGVs and AIL are not anticipated for general maintenance.
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.	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 Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11].

Table 3: National Policy Statement for Electricity Networks Infrastructure (EN-5) December 2025

Relevant Paragraph	Detail	Scheme Compliance
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 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 [EN0110014/APP/7.11] 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.
1.1.4	The new network infrastructure needed reflects the huge overhaul of the electricity grid as the UK continues its accelerated transition from fossil fuels to clean electricity generation, in support of Clean Power by 2030. The National Energy System Operator's (NESO) Clean Power 2030 report acknowledged that current plans for network expansion are sufficient, but must overcome many barriers to deliver on time, and some vital projects need to be accelerated to deliver by 2030.	The Statement of Need [EN0110014/APP/7.11] states that the Scheme is to connect to an overhead line which passes near to the Site via the proposed new National Grid Substation which is included within the Order limits. The overhead line into which the Scheme will connect is an existing part of the NETS. It has sufficient capacity to transmit the energy the Scheme; will generate to consumers nationally as well as into local distribution networks. This is a key benefit of the Scheme.
1.1.5	Geographically, this means new infrastructure is needed in locations which have historically not had high amounts of network capacity as they have not been near sources of electricity generation. This is particularly the case in some rural and coastal parts of the UK, including part of the east coast, nearest to sources of offshore wind generation and other forms of clean energy generation.	The overhead line into which the Scheme proposes to connect is on a north-south section of the NETS between the existing National Grid Norwich Main substation to the north and the existing National Grid Bramford substation to the south. In turn, existing transmission lines extend past both Norwich Main and Bramford to allow power to flow south towards London and the south east and also west towards the Midlands.
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	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.

Relevant Paragraph	Detail	Scheme Compliance
	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 Statement of Need [EN0110014/APP/7.11] 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.
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.	ES Volume 1, Chapter 5 - Reasonable Alternatives and Design Evolution [EN0110014/APP/6.1.5] 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 the Site Selection Assessment [EN0110014/APP/7.20] 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 Selection Assessment [EN0110014/APP/7.20] explains the rationale for the location of the Scheme and the extent of the Order Limits. The Applicant engaged with National Grid Company plc (NGC) in 2022 to discuss available capacity within its transmission network within the Norfolk area for integrating a 500MW solar utility-scale solar generating project. Consideration was initially given to a Point of Connection (PoC) at the existing Norwich Main Substation. However, National Grid advised that there was neither sufficient existing capacity at the Norwich Main Substation nor an opportunity to expand this existing substation to accommodate a 500MW solar project. Given this, the Norwich Main Substation was discounted as a viable PoC. Following these discussions, it was identified by National Grid that there was available capacity along the Bramford to Norwich 400kV line between Diss and Norwich and that a new National Grid Substation would be required to connect the Scheme to the grid. A grid connection offer was subsequently received which contracted the Applicant to provide the land and gain consent for the proposed new National Grid Substation. Further information on the grid connection agreement can be found in the Grid Connection Statement [EN0110014/APP/7.12]. As set out in ES Volume 1, Chapter 5 - Reasonable Alternatives and Design Evolution [EN0110014/APP/6.1.5], Norfolk represents a good location within the UK to construct a solar farm
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 Operator NESO.	
2.2.8	There will usually be a degree of flexibility in the location of the development's associated infrastructure such as substations, and applicants should consider carefully their location, as well as their design.	
2.2.9	In particular, the applicant should consider such characteristics as the local topography, the possibilities for screening of the infrastructure and/or other options to mitigate any impacts. (See Sections 2.9 – 2.10 below and Section 5.10 in EN-1.)	

Relevant Paragraph	Detail	Scheme Compliance
		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.
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.	ES Volume 1, Chapter 6 - Climate Change [EN0110014/APP/6.1.6] assesses 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. ES Volume 1, Chapter 6 - Climate Change [EN0110014/APP/6.1.6] 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 Outline CEMP [EN0110014/APP/7.1] and Outline DEMP [EN0110014/APP/7.3]. The Outline OEMP [EN0110014/APP/7.2] 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 Outline CEMP [EN0110014/APP/7.1], the Outline OEMP [EN0110014/APP/7.2], and the Outline DEMP [EN0110014/APP/7.3] 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 Outline CEMP [EN0110014/APP/7.1] and Outline OEMP [EN0110014/APP/7.2]. ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9] assesses the impacts of the Scheme on the water environment 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.
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)	

Relevant Paragraph	Detail	Scheme Compliance
	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).	ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9] has been informed by ES Volume 3, Appendix 9.1 - FRA and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1] and assesses the likely impacts and effects of the Scheme in relation to hydrology, flood risk and drainage for the whole lifecycle of the Scheme. All impacts on the water environment are also assessed within ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9]. ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9] concludes that, with the embedded mitigation, including sequentially located associated electrical infrastructure, and incorporation of SuDS, and the measures described in the Outline CEMP [EN0110014/APP/7.1] and Outline DEMP [EN0110014/APP/7.3], no significant residual effects are anticipated. These will be secured through Requirements in Schedule 2 to the draft DCO [EN0110014/APP/3.1]. The residual effects outlined in the assessment rely on controls established within the Outline CEMP [EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2], ES Volume 3, Appendix 9.1 - FRA and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1] and the Outline DEMP [EN0110014/APP/7.3]. These outline management plans and the Outline Surface Water Drainage Strategy, which is embedded in ES Volume 3, Appendix 9.1 - FRA and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1], 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 ES Volume 3, Appendix 9.1 - FRA and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1], 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. ES Volume 3, Appendix 9.1 - FRA and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1] 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 [EN0110014/APP/3.1]. The Design Approach Document [EN0110014/APP/7.17] includes the adoption of project level design principles to guide decision making and embed good design outcomes to the Scheme. Project

Relevant Paragraph	Detail	Scheme Compliance
		Level Design Principle 4.3 ensures the Scheme is resilient to flooding and does not increase flooding elsewhere.
Consideration of Good Design for Energy Infrastructure		
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.	As detailed in the Planning Statement [EN0110014/APP/7.14], good design has been a fundamental consideration from the outset of the Scheme. The Design Approach Document [EN0110014/APP/7.17] 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 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 [EN0110014/APP/6.1.6-18]. The relevance and application of the Holford and Horlock rules and Electricity Transmission Design Principles are considered in further detail against Section 2.9 policy below. The Applicant initially considered a Point of Connection (PoC) at the existing Norwich Main Substation. However, National Grid advised that there was neither sufficient existing capacity at the Norwich Main Substation nor an opportunity to expand this existing substation to accommodate a 500MW solar project. Given this, the Norwich Main Substation was discounted as a viable PoC. National Grid confirmed a new substation would be required in order to connect the Scheme to the grid. Through these discussions, available capacity along the Bramford to Norwich 400kV overhead line was identified by National Grid in Norfolk between Norwich and Bramford. This capacity would allow the energy generated by the Scheme to consumers nationally, as well as into local distribution networks. As per the Grid Connection Statement [EN0110014/APP/7.12], the Applicant submitted a grid application to the National Energy System Operator (NESO), the system operator of the National Electricity Transmission System (NETS) to connect the Scheme into the NETS existing transmission line via a new National Grid Substation.

Relevant Paragraph	Detail	Scheme Compliance
		A grid connection offer was subsequently received in October 2022 from NESO, working with NGET, which contracted the Applicant to provide the land to gain consent for the proposed new National Grid Substation, which was accepted by the Applicant. The Grid Connection Agreement allows the Applicant to export up to 500MW of electricity through the new National Grid Substation, and import up to 500MW to be stored in the Battery Energy Storage System (BESS). Subsequently, the Applicant began searching for a suitable site for a new National Grid Substation along the 400KV overhead line from Norwich to Bramford. The Site Selection Assessment [EN0110014/APP/7.20] sets out the Applicant's National Grid Substation site assessment which is informed by National Grid Company plc's Substation and the Environment: Guidelines on Siting and Design document. The NG Substation was chosen based on consideration of proximity to the 400KV OHL / accessibility. The site selection process and consideration of alternative sites was conducted based on the guidelines set out in Section III of the Horlock rules. The chosen location for the National Grid Substation has been refined throughout scoping / PEIR and is considered to perform well against this criteria. The Holford rules guide the routing of high voltage overhead lines. By choosing a PoC in proximity to the existing overhead line, the Applicant has sought to limit the extent of diversion of this line, thereby reducing the potential for impacts on areas of amenity value and the landscape.
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.
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.	ES Volume 1, Chapter 4 - The Scheme [EN0110014/APP/6.1.4] 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, Project Substations 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 [EN0110014/APP/7.18]. ES Volume 1, Chapter 4 - The Scheme [EN0110014/APP/6.1.4] 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 [EN0110014/APP/7.18].

Relevant Paragraph	Detail	Scheme Compliance
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: • Reconnect important habitats via green corridors, biodiversity stepping zones, and reestablishment of appropriate hedgerows; and/or • Connect people to the environment, for instance via footpaths and cycleways constructed in tandem with environmental enhancements.	ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] 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 Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] 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 moderate beneficial effects anticipated on the following - • Native hedgerows and tree lines • Ponds • Rivers • Lowland Deciduous Woodland • Scrub • Other neutral grassland • Ditches • Breeding Birds • Skylark • Badgers • Water Vole and Otters. The expected residual beneficial effects outlined in ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1] rely on controls established in the Outline CEMP [EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2], Outline DEMP [EN0110014/APP/7.3] and the Outline LEMP [EN0110014/APP/7.4] and are secured via corresponding requirements of the draft DCO [EN0110014/APP/3.1]. Section 8.8 of ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1] 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. These measures are referred to

Relevant Paragraph	Detail	Scheme Compliance
		within the Outline CEMP [EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2] and the Outline DEMP [EN0110014/APP/7.3], and secured via the draft DCO [EN0110014/APP/3.1]. Landscape and ecological enhancements and mitigation measures for the Scheme are shown within the Green Infrastructure Strategy within the Outline LEMP [EN0110014/APP/7.4]. As presented in the BNG Report [EN0110014/APP/7.23], the ecological mitigation and enhancement areas are predicted to provide a net gain of 37.42% for onsite habitats, and a net gain of 31.35% for onsite hedgerow and tree lines while a requirement of the draft DCO [EN0110014/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 Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1] outlines the summary of biodiversity inter-project cumulative effects, including residual significant effects, in EIA terms. The section concludes that taking into account the proposed embedded mitigation measures, the residual impacts as a result of the construction, operational and maintenance and decommissioning phases of the Scheme are not likely to be significant. On this basis there is no mechanism for cumulative effects on any other development/scheme as identified on the short-list provided in ES Vol 31, Appendix 2.4 Cumulative Schemes [EN0110014/APP/6.3.2.4], nor will the Scheme result in a cumulative effect on those Important Ecological Features considered within the chapter. The Outline PRoWPPMP [EN0110014/APP/7.8] 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 850 linear metres of permissive paths.
Land Rights and Land Interests		
2.6.1	In order to be lawfully able to install, inspect, maintain, repair, adjust, alter, replace or remove an electricity line (above or below ground), its related equipment (such as monopoles, pylons/transmission towers, transformers and cables), and/or its associated mitigation or enhancement schemes, applicants must: • Own the land on, over, or under which the relevant activity is to take place; or	The Applicant has sought to secure the rights over land, both temporary and permanent, through voluntary negotiations. The Statement of Reasons [EN0110014/APP/4.1] sets out that the compulsory acquisition powers sought in the draft DCO [EN0110014/APP/3.1] that are necessary to provide sufficient land and rights to construct, operate and decommission the Scheme. All reasonable alternatives to compulsory acquisition have been explored and where possible secured, for example through landowner agreement as evidenced in the Book of Reference [EN0110014/APP/4.3].

Relevant Paragraph	Detail	Scheme Compliance
	- Hold sufficient rights over or interests in that land (typically in the form of an easement); or <u>Have</u> permission for the activity from the present owner or occupier of that land (typically in the form of a wayleave).	The Statement of Need [EN0110014/APP/7.11] sets out the need for the Scheme and how in line with the energy National Policy Statements the government recognises the need for significant amount of new large-scale energy infrastructure. Considering this, the compulsory acquisition of land and the temporary use of land is considered reasonable and justified.
2.6.2	Where the applicant does not own or wish to own the land in question, it should try to reach a voluntary agreement giving it sufficient rights and/or permissions to undertake the relevant work.	
2.6.3	As a last resort, where it does not succeed in reaching the agreement that it requires, the network company may, as part of its application to the Secretary of State, seek to acquire rights compulsorily over the land in question by means of a provision in the DCO.	
2.6.4	In such cases (i.e. where the compulsory acquisition of rights is sought) permanent arrangements are strongly preferred over voluntary wayleaves (which could, for example, be terminable on notice by the landowner) in virtue of their greater reliability and economic efficiency and reflecting the importance of the relevant infrastructure to the government's Clean Power and net zero goals.	
2.6.5	The applicant may also seek the compulsory acquisition of land. This will not normally be necessary where lines and cables are installed but may be sought where other forms of electricity networks infrastructure (such as new substations) are required.	
2.6.6	As detailed in Section 4.1.8 of EN-1, where the use of land at a specific location is required to facilitate the development by providing for mitigation, and landscape enhancement and biodiversity net gain, an applicant may, as part of its application to the Secretary of State, seek the compulsory acquisition of that land, or rights over that land. The Secretary of State will consider any such application under the	

Relevant Paragraph	Detail	Scheme Compliance
	provisions of the Planning Act 2008 and any associated guidance.	
2.6.7	Ahead of securing land rights or interests for transmission infrastructure development itself, an applicant will, in many cases, need to obtain access to land to conduct technical and environmental surveys to inform their development proposals. Some of these will be seasonal species surveys meaning there are limited opportunities during the course of the year in which they can be undertaken; timely access for surveys can have a significant impact on overall project timelines.	
Strategic Network Planning		
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.	A grid connection offer was received in October 2022 from NESO, working with NGET, which contracted the Applicant to provide the land to gain consent for the proposed new National Grid Substation, which was accepted by the Applicant. The Grid Connection Agreement allows the Applicant to export up to 500MW of electricity through the new National Grid Substation, and import up to 500MW to be stored in the Battery Energy Storage System (BESS). Due to the grid connection offer, a 500MW connection into the existing overhead line between Norwich Main and Bramford has been offered, as set out in the Grid Connection Statement [EN0110014/APP/7.12]. The offer outlines the need for the Applicant to source land suitable for a new National Grid Substation as detailed in the Site Selection Assessment [EN0110014/APP/7.20].
Landscape and Visual Impact		
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	The Applicant's approach to considering the site of the proposed National Grid Substation is detailed in the Site Selection Assessment [EN0110014/APP/7.20] , this includes how site selection has been informed by the consideration of landscape and visual impacts.
2.9.18	The Horlock Rules (guidelines for the design and siting of substations) were established by National Grid in 2009 in pursuance of its duties under Schedule 9 to the Electricity Act 1989. These principles should be embodied in applicants'	As described within the Site Selection Assessment [EN0110014/APP/7.20] , the NG Substation was chosen based on consideration of proximity to the 400KV OHL / accessibility. The site selection process and consideration of alternative sites was conducted based on the guidelines set out in Section III of the Horlock rules. The chosen location for the National Grid Substation has been refined throughout scoping / PEIR and is considered to perform well against these criteria. The chosen

Relevant Paragraph	Detail	Scheme Compliance
	proposals for the infrastructure associated with new overhead lines ²¹ .	location for the National Grid Substation avoids major designated areas of ecological or cultural importance, with only limited priority habitats and no heritage assets, County Wildlife Sites, or Ancient Woodland present.
2.9.19	In brief, the Horlock Rules state that applicants should: - Consider environmental issues from the earliest stage to balance the technical benefits and capital cost requirements for new developments against the consequential environmental effects in order to keep adverse effects to a reasonably practicable minimum; - Seek to avoid altogether internationally and nationally designated areas of the highest amenity, cultural or scientific value by the overall planning of the system connections; - Protect as far as reasonably practicable areas of local amenity value, important existing habitats and landscape features including ancient woodland, historic hedgerows, surface and ground water sources and nature conservation areas; - Take advantage of the screening provided by land form and existing features and the potential use of site layout and levels to keep intrusion into surrounding areas to a reasonably practicable minimum; - Keep the visual, noise and other environmental effects to a reasonably practicable minimum; - Consider the land use effects of the proposal when planning the siting of substations or extensions; - Consider the options available for terminal towers, equipment, buildings and ancillary development appropriate to individual locations, seeking to keep effects to a reasonably practicable minimum; - Use space effectively to limit the area required for development consistent with appropriate	The Applicant has sought to limit the extent of diversion of this line, thereby reducing the potential for impacts on areas of amenity value and the landscape.

Relevant Paragraph	Detail	Scheme Compliance
	mitigation measures and to minimise the adverse effects on existing land use and rights of way, whilst also having regard to future extension of the substation; • Make the design of access roads, perimeter fencing, earthshaping, planting and ancillary development an integral part of the site layout and design, so as to fit in with the surroundings; • In open landscape especially, high voltage line entries should be kept, as far as possible, visually separate from low voltage lines and other overhead lines so as to avoid a confusing appearance; • Study the inter-relationship between towers and substation structures and background and foreground features so as to reduce the prominence of structures from main viewpoints. Where practicable the exposure of terminal towers on prominent ridges should be minimised by siting towers against a background of trees rather than open skylines	
2.10.8	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.	Measures are secured in the Outline LEMP [EN0110014/APP/7.4], 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 [EN0110014/APP/3.1]. The National Grid Substation and the Grid Connection Infrastructure would remain in situ after decommissioning. Mitigation planting specifically required to support the location of the National Grid Substation, as identified in ES Volume 2, Figure 4.1 - Indicative Masterplan [EN0110014/APP/6.2.4.1] and the Green Infrastructure Strategy within the Outline LEMP [EN0110014/APP/7.7], would be handed over to National Grid who would be responsible for its maintenance and management.
Noise and Vibration		
2.9.38	Audible noise effects can also arise from substation equipment such as transformers, quadrature boosters and mechanically switched capacitors.	ES Volume 1, Chapter 12 - Noise and Vibration [EN0110014/APP/6.1.12] presents a noise assessment in accordance with the requirements of this policy, including a description of the noise generating aspects of the development.

Relevant Paragraph	Detail	Scheme Compliance
2.9.39	Transformers are installed at many substations, and generate low frequency hum. Whether the noise can be heard outside a substation.	The noise assessment is proportionate to the likely noise impact. ES Volume 1, Chapter 12 - Noise and Vibration [EN0110014/APP/6.1.12] 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 and other aspects of the Scheme. 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. Embedded noise measures have been incorporated through design buffers (offsets) and measures included in the Outline OEMP [EN0110014/APP/7.2] . The use of enclosures, local screening, mufflers, and silencers will also be used as appropriate. The National Grid Substation and Project Substations will be designed to have minimal tonal, impulsive or intermittent features as far as is practicable. Additional mitigation measures for the operational phase are set out in ES Volume 1, Chapter 12 - Noise and Vibration [EN0110014/APP/6.1.12] . These embedded and additional mitigation measures for the substation are also described in the Outline OEMP [EN0110014/APP/7.2] .
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.	
2.11.7	The Secretary of State should ensure that appropriate assessment methodologies have been used in the evidence presented to it, and that the appropriate mitigation options have been considered and adopted. Where the applicant can demonstrate that appropriate mitigation measures will be put in place, the residual noise impacts are unlikely to be significant.	
Sulphur Hexafluoride		
2.9.60	Sulphur Hexafluoride (SF6) is an insulating and arc-suppressant gas used in high-voltage switchgear for electricity networks.	ES Volume 1, Chapter 6 - Climate Change [EN0110014/APP/6.1.6] states that GHG emissions will be generated as a result of operational activities such as the transportation of operational workers to and from the Scheme, water consumption, and replacement, and maintenance activities. While SF6 has the potential to result in GHG emissions over the lifetime of the Scheme (i.e., during production, operation through leakage, and decommissioning), it has not been possible to quantify the potential fugitive emissions from SF6 leakage. However, the Scheme will adhere to good practice and guidance. 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.
2.9.61	It is also an extraordinarily potent greenhouse gas, and fugitive emissions from electricity networks infrastructure are an object of increasing environmental concern, especially in light of the UK's commitment to net zero by 2050.	
2.9.62	Applicants should at the design phase of the process consider carefully whether the proposed development could be reconceived to avoid the use of SF6-reliant assets.	
2.9.63	Where the development cannot be so conceived, the applicant must provide evidence of their reasoning on this point. Such evidence will include, for instance, an explanation of the alternatives considered, and a case why these alternatives are technically infeasible or require bespoke	

Relevant Paragraph	Detail	Scheme Compliance
	components that are grossly disproportionate in terms of cost.	
2.9.64	In particular, an accounting of the cost differential between the SF6- reliant asset and the appropriate SF6-free alternative should be provided.	
2.9.65	Where applicants, having followed the above procedure, do propose to put new SF6-reliant assets onto the electricity system, they should design a plan for the monitoring and control of fugitive SF6 emissions consistent with the Fluorinated gas (F-gas) Regulation and its successors.	
2.10.14	The climate-warming potential of SF6 is such that applicants should, as a rule, avoid the use of SF6 in new developments.	
2.10.15	Where no proven SF6-free alternative is commercially available, and where the cost of procuring a bespoke alternative is grossly disproportionate, the continued use of SF6 is acceptable, provided that emissions monitoring and control measures compliant with the F-gas Regulation and/or its successors are in place.	
Electric and Magnetic Fields (EMFs)		
2.9.51	For protecting against indirect effects, the ICNIRP 1998 guidelines give an electric field reference of 5kV m-1 for the general public and keeping electric fields below this level would reduce the occurrence of adverse indirect effects for most individuals to acceptable levels. When this level is exceeded, there is a suite of measures that may be called upon in particular situations, including provision of information, earthing and screening, alongside limiting the field. In some situations, there may be no reasonable way of eliminating indirect effects.	An electromagnetic assessment has been conducted and is presented in ES Volume 1, Chapter 17 - Electromagnetic Fields (EMF) [EN0110014/APP/6.1.17] . The Applicant does not anticipate any significant adverse EMF effects on any receptors. 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.
2.9.52	The levels of EMFs produced by power lines in normal operation are usually considerably lower	

Relevant Paragraph	Detail	Scheme Compliance
	than the ICNIRP 1998 reference levels. For electricity substations, the EMFs close to the sites tend to be dictated by the overhead lines and cables entering the installation, not the equipment within the site.	
2.10.11	The applicant should consider the following factors: • Height, position, insulation and protection (electrical or mechanical as appropriate) measures subject to ensuring compliance with the Electricity Safety, Quality and Continuity Regulations 2002; • That optimal phasing of high voltage overhead power lines is introduced wherever possible and practicable in accordance with the Code of Practice to minimise EMFs; and • Any new advice emerging from the Department of Health and Social Care relating to government policy for EMF exposure guidelines.	
2.11.14	In order to avoid unacceptable adverse impacts of EMFs from electricity network infrastructure on communication, navigation and surveillance infrastructure, the Secretary of State will take account of statutory technical safeguarding zones defined in accordance with Planning Circular 01/0335, or any successor, when considering recommendations for DCO applications. More detail on this issue can be found in Section 5.5 of EN-1.	
2.11.15	Where a statutory consultee on the safeguarding of technical facilities identifies a risk that the EMF effect of electricity network infrastructure would compromise the effective and safe operation of such facilities, the potential impact and siting and design alternatives will need to have been fully considered as part of the application.	

Table 4: National Planning Policy Framework

Relevant Paragraph	Detail	Scheme Compliance
Section 12: Achieving sustainable developmentIntroduction		
Paragraph 150	The purpose of the planning system is to contribute to the achievement of sustainable development, by managing the use and development of land in the long-term public interest. NPPF sets out that planning policies and decisions should play an active role in guiding development towards sustainable solutions. Paragraph 10 of the NPPF states that at its heart is a "presumption in favour of sustainable development".	The Statement of Need [EN0110014/APP/7.11] sets 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.
Paragraph 167	At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.	
Paragraph 817	Achieving sustainable development means that the planning system has three overarching objectives ... which-These objectives 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 all three): 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	<u>In relation to the economic objective, ES Volume 1, Chapter 14 - Socio-Economics [EN0110014/APP/6.1.14]</u> describes the existing levels and assesses the anticipated economic and social effects of the Scheme's construction, operational, and decommissioning. It concludes that there are multiple significant beneficial effects associated with the Scheme, including moderate beneficial effects on, the local skills and labour market during construction, a major beneficial effect through the supporting jobs in South Norfolk during decommissioning and through providing opportunities to upskill the local workforce. <u>In relation to the social objective, t</u> The Human Health Summary Statement within ES Volume 1, Chapter 18 - OEM [EN0110014/APP/6.1.18] presents a summary of the potential for likely significant effects on human health as result of the Scheme using ISEP guidance on health. <u>In relation to the environmental objective, ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8], Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] and ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7]</u> respectively provide assessments on environmental receptors and appropriate mitigation where necessary which are subsequently secured in the relevant management plans.

Relevant Paragraph	Detail	Scheme Compliance
	can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services <u>community facilities, public service infrastructure</u> and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and c) an environmental objective – <u>to support efforts to mitigate and adapt to climate change, including moving to a low carbon economy; and to protect and enhance our natural, built and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, and minimising waste and pollution 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.</u>	Appropriate mitigation is outlined both within the ES chapters and also within the Outline CEMP [EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2], and the Outline DEMP [EN0110014/APP/7.3], which are secured by Requirements in Schedule 2 of the draft DCO [EN0110014/APP/3.1]. <u>The Biodiversity Net Gain Report [APP-218] sets out how a minimum of 10% net gain will be achieved for the Scheme using the Statutory Biodiversity Metric. The Scheme will deliver, as a minimum, 10% BNG, which is secured in the Draft DCO [AS-032]. The Green Infrastructure Strategy [AS-005] demonstrates the Scheme would provide extensive new and enhanced green infrastructure. This includes for the retention and enhancement of green infrastructure assets, including restoration of ghost ponds, where practicable, together with new tree and hedgerow planting.</u> <u>The Statement of Need [APP-206] sets 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.</u> <u>ES Volume 1, Chapter 6 – Climate Change [APP-042] sets out the Scheme's resilience to climate change. This includes working practices (including protection from extreme weather), surface water drainage measures and cooling systems, which will be secured through various management plans submitted with the DCO Application, as set out in the Outline LEMP [APP-199], Outline CEMP [APP-196] and Outline OEMP [APP-197]. The Outline LEMP [APP-199] includes objectives for different types of habitats to contribute to the resilience and adaptation to climate change, including for example, species selection that will provide a climatically resilient planting mix. Further design commitments relevant to adaptation are secured in the Design Principles, Parameters and Commitments [APP-213]. ES Volume 1, Chapter 6 – Climate Change [APP-042] concludes that the embedded measures are considered an adequate response to the projected climate change impacts to which the Scheme would be exposed.</u> <u>Waste is considered in ES Volume 1, Chapter 18 - OEM [APP-054] 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 OEM will detail collection, separation, sorting, recycling, and recovery of waste arising from the development during operational phase. The construction of the Scheme will be subject to measures and procedures defined within a</u>
Paragraph 18	<u>The NPPF sets out that planning policies and decisions should play an active role in guiding development towards sustainable solutions. The objectives set out in Paragraph 17 should be delivered through the preparation and implementation of development plans and the application of the policies in this Framework; they are not criteria against which every development proposal can or should be judged</u>	

Relevant Paragraph	Detail	Scheme Compliance
		<u>detailed CEMP. 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 Outline CEMP [APP-196]</u> <u>ES Volume 1, Chapter 13 - Air Quality [APP-049] concludes that no significant effects are anticipated on air quality as a result of the Scheme and therefore will not lead to a deterioration in air quality. Embedded measures for air quality are secured through the Outline CEMP [APP-196], the Outline CTMP [APP-201], the Outline BSMP [APP-200], the Outline OEMP [APP-197], and the Outline DEMP [APP-198].</u> <u>ES Volume 1, Chapter 12 - Noise and Vibration [APP-048] assesses the likely effects of the Scheme in relation to noise for the construction, operation and decommissioning phases of the Scheme. This concludes that with the implementation of embedded mitigation and example additional mitigation, the residual effects arising from the Scheme will not be significant.</u>
Paragraph 11	For decision taking this means: e) approving development proposals that accord with an up-to-date development plan without delay	This document as well as the Planning Statement [EN0110014/APP/7.14] shows how the Scheme has considered policies within the local development plan.
Section 4: Achieving Sustainable Development		
Objective	<u>The objective of the policies in this chapter is to meet development needs through sustainable patterns of development, including by maximising the potential for growth on suitable land within settlements, enabling development which will support the rural economy, rural communities and the provision of infrastructure, and limiting development away from settlements to help safeguard the intrinsic character and beauty of the countryside.</u>	The Statement of Need [APP-206] sets 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. In relation to 'development which will support the rural economy' ES Volume 1, Chapter 14 - Socio-Economics [APP-050] describes the anticipated economic and social effects of the Scheme's construction, operational, and decommissioning. It concludes that there are multiple significant beneficial effects associated with the Scheme, including moderate beneficial effects on, the local skills and labour market during construction, a major beneficial effect through the supporting jobs in South Norfolk during decommissioning and through providing opportunities to upskill the local workforce.
Policy S3 (1)	<u>Decisions on development proposals should apply a presumption in favour of sustainable development. This means: . . . b. Outside settlements, policy S5 should be applied; . . .</u>	

Relevant Paragraph	Detail	Scheme Compliance
	c. In all locations, development proposals that accord with both an up-to-date development plan and the decision-making policies in this Framework should be approved without delay.	This document as well as the Planning Statement [APP-209] shows how the Scheme has considered policies within the local development plan. In relation to the overall balance of benefits and adverse effects, the Planning Statement [APP-209] concludes that the significant adverse effects identified are clearly outweighed by the substantial public benefits that would arise from the provision of low carbon energy.
Policy S5	Policy S5: 'Principle of development outside settlements' (1) sets out the forms of development that should be approved outside of settlements, which includes {at (a) development for energy infrastructure. Policy S5 states that these uses should be approved, 'unless the benefits of doing so would be substantially outweighed by any adverse effects.'	In relation to safeguarding the beauty and character of the countryside, as part of the Green Infrastructure Strategy [AS-005] , landscaping features would retained as far as practicable and be enhanced, such as through strengthening/reinforcing existing hedgerows (infill planting/laying coppicing) and new tree, woodland and wildflower or species rich mix grassland, together with the restoration of ghost ponds, where practicable. Skylark mitigation plots would also be provided. This would collectively strengthen habitat connectivity at a landscape scale and positively contribute to local green infrastructure. The Green Infrastructure Strategy illustrates that approximately 25ha of new tree planting (in addition to hedgerow tree improvements) within the Scheme. ES Volume 1, Chapter 7 - Landscape and Visual [APP-043] provides a landscape and visual assessment of the likely effects during all phases of the Scheme. This includes an assessment on National Character Areas and Local Character Areas with reference to published studies, national and local planning policy and guidance.
Section 5: Meeting the Challenge of Climate Change		
Objective	The objective of the policies in this chapter is to support the transition to net zero by 2050 and to shape places in ways which are more resilient to the effects of climate change. It does this by setting out policies to shape places in ways that contribute to radical reductions in greenhouse gas emissions and adapt to the full range of current and potential impacts of climate change, by minimising vulnerability and improving resilience.	The Statement of Need [APP-206] confirms large-scale solar is a proven technology, capable of delivery at scale against the timeframes required to deliver net zero. The Scheme will, if consented, bring forward large-scale ground-mount solar with co-located energy storage facilities and will make a critical contribution towards net zero and timely contribution to meeting the Government's targets of Clean Power by 2030. The Statement of Need [APP-206] 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. The Sequential Test has been applied during site selection as presented in the Site Selection Assessment [APP-215] and a sequential approach applied to the design and layout of the Scheme as

Relevant Paragraph	Detail	Scheme Compliance
		described in the Planning Statement [APP-209] by directing the most vulnerable aspects of the Scheme to areas of lowest flood risk as far as practicable. The project level design principles in the Design Approach Document [APP-212] include commitments to reduce carbon emissions during all phases of the Scheme, together with retention and enhancement of existing vegetation, as far as practicable and to manage surface water drainage. Flexibility is sought in the design for resilience and adaptation to climate change through the design process.
CC2: Mitigation of climate change	A national decision-making policy to contribute to climate change mitigation and the transition to net zero. Sub paragraphs relevant to East Pye Solar include: a) sustainable patterns of movement should be achieved, f) creation and restoration of habitats which can act as carbon stores, while avoiding harm to habitats should be achieved and g) development proposals should not involve the extraction of fossil fuels	ES Volume 1, Chapter 6 - Climate Change [APP-042] sets out measures to mitigate the impact of higher temperatures on the Scheme. The Scheme would be designed to be adaptive and resilient to climate change. The provision of all year-round grassland/wildflower meadow beneath the Solar PV Arrays will reduce soil erosion, contribute to greater interception/evapotranspiration of rainfall and increase ground roughness across the fields, thereby slowing the rate of runoff across Sites. This would reduce flooding to villages located at the bottom of drainage catchments. 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 Outline CEMP [APP-196] and Outline OEMP [APP-197].
CC3: Adaptation to Climate Change	A national decision-making policy to ensure consideration of current and potential impacts of climate change over the lifetime of a scheme to minimise vulnerability to impacts. Development proposals should (where relevant to East Pye Solar): a) be located where risk of flooding is minimised, or can be managed and the development made safe without increasing risk elsewhere, c) incorporate sustainable drainage systems, and e) incorporate proportionate measures to mitigate against wildfires (limit fuel loads, create defensible spaces, such as by avoiding timber panel fences and incorporating firebreaks into layouts and planting schemes.	As set out in ES Volume 1, Chapter 9 - Water Environment [APP-045], a sequential approach to the siting of infrastructure has been applied, with infrastructure located outside areas of highest flood risk as far as reasonably practicable. A Sequential Test and Exception Test is presented in the Planning Statement [APP-209]. The Sequential Test has been applied during site selection as presented in the Site Selection Assessment [APP-215] and a sequential approach applied to the design and layout of the Scheme as described in the Planning Statement [APP-209] by directing the most vulnerable aspects of the Scheme to areas of lowest flood risk as far as practicable. The Applicant has considered flooding in the design of the Scheme to minimise the risk of flooding both to and from the Scheme. The most vulnerable elements of infrastructure, being the National Grid Substation, the BESS and Project Substations (along with the Solar PV Arrays) would be sited in areas of Flood Zone 1, at lower risk of flooding. This is secured through the Works Plan [AS-002 and AS-003]. The Scheme components within Flood Zones 2 and 3 would therefore relate to electrical cabling, fencing, access and maintenance tracks, together with landscape and biodiversity mitigation and enhancement measures.

Relevant Paragraph	Detail	Scheme Compliance
		<u>In preparing measures to support climate change adaptation, consideration has been given to incorporating nature-based solutions into the Scheme. Proposals for Sustainable Drainage Systems (SuDS) have been included as part of the Scheme design, as set out in ES Volume 1, Chapter 9 - Water Environment [APP-045].</u> <u>ES Volume 1, Chapter 6 - Climate Change [APP-042] assesses 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. ES Volume 1, Chapter 6 - Climate Change [APP-042] sets out the following embedded mitigation measures to ensure the Scheme is resilient to the increased risks associated with climate change:</u> <u>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 Outline CEMP [APP-196] and Outline DEMP [APP-198]. The Outline OEMP [APP-197] 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.</u> <u>The Outline CEMP [APP-196], the Outline OEMP [APP-198], and the Outline DEMP [APP-198] 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.</u> <u>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 Outline CEMP [APP-196] and Outline OEMP [APP-197].</u>
<u>Section 7: Building a strong, effective economy</u>		
<u>Objective</u>	<u>The objective is to enable businesses to invest, expand and adapt in a way that reflects the opportunities, challenges and characteristics of different areas, and supports long-term economic growth both locally and nationally.</u>	<u>The Outline Employment, Skills and Supply Chain Strategy (ESSCS) [APP-205], which is secured within the Draft DCO [AS-032], sets out the proposals to generate and enhance skills, training and education opportunities. The Applicant is committed to promoting apprenticeships, supporting local labour where practicable, and collaborating with local further and higher education providers, established initiatives and local businesses. A Skills, Supply Chain, and Employment Plan would be secured in line with the Outline ESSCS to support training, apprenticeships and supply chain opportunities during construction and periods of on-site infrastructure replacement during operation. Where feasible, the Scheme would promote transferable skills to support workforce progression and stimulate local economic activity.</u>
<u>Policy E2: Meeting the need for business land and premises</u>	<u>To support business growth, substantial weight should be given to: paragraph 1, sub-paragraph. b). Benefits for domestic food production, animal welfare and/or the environment which can be demonstrated through proposals for development for farm and agricultural modernisation.</u>	<u>As set out in the Outline ESSCS [APP-205] and ES Volume 1, Chapter 14 - Socio-Economics [APP-050], the Scheme is anticipated to create 233 Full Time Equivalent (FTE) with the estimated on-site construction workforce expected to peak at approximately 604 FTE jobs. An estimated 360 net direct jobs</u>

Relevant Paragraph	Detail	Scheme Compliance
<u>Policy E4: Rural business development</u>	<u>Sustainable growth of businesses in rural areas should be supported through (where relevant to East Pye Solar): paragraph 1, sub-paragraph b. the development and diversification of agricultural and other land-based businesses.</u>	<u>and 684 net indirect and induced jobs would be created during the construction phase, totalling 1,044 net additional jobs. During operation, an estimated maximum of 15 permanent jobs would be generated. In a peak replacement scenario, 240 FTE are required and in the decommissioning phase, in the absence of knowledge about the socio-economic context during that time, decommissioning effects of the Scheme are assumed to be the same as those assessed for the construction phase.</u> <u>The Outline ESSCS [APP-205] 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.</u> <u>ES Volume 1, Chapter 14 - Socio-Economics [APP-050] 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 skills and the labour market during the construction and decommissioning phases, and on jobs, employment and supply chain (workplace-based) during the decommissioning phase.</u> <u>ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051] provides an assessment of food production and the rural economy. Overall, the impact on the wider rural economy is expected to be limited. In respect of the economic and other benefits of BMV land within the Scheme:</u> <u>• The economic benefits are about £190,000 per annum which is considered to be negligible on a regional basis; and</u> <u>• The food production benefits are estimated at around 1,000 tonnes per annum incremental production benefit, which is negligible on a regional and national level.</u> <u>The landowners of the Sites have entered into an option agreement for the Sites. The farms involved will benefit from the guaranteed income from the diversification of the enterprise base.</u>
<u>Section 10: Securing clean energy and water</u>		
<u>Objective</u>	<u>The objective of the policies in this chapter is to support the development and operation of energy and water infrastructure in ways which align with wider development, clean power and net zero objectives (including the delivery of clean power by 2030).</u>	<u>The Statement of Need [APP-206] confirms large-scale solar is a proven technology, capable of delivery at scale against the timeframes required to deliver net zero. The Scheme will, if consented, bring forward large-scale ground-mount solar with co-located energy storage facilities and will make a critical contribution towards net zero and timely contribution to meeting the Government's targets of Clean Power by 2030.</u>
<u>W3: Renewable</u>	<u>National decision-making policy gives substantial weight to (where relevant to East</u>	

Relevant Paragraph	Detail	Scheme Compliance
<u>and low carbon energy development and electricity network infrastructure</u>	Pye Solar): paragraph 1, sub-paragraph a. the benefits for improving energy security, supporting economic development and/or the transition to a net zero future. Paragraph 2 notes that applicants should not be required to demonstrate the need for renewable or low carbon energy development and electricity network infrastructure. Paragraph 3 notes that where development is time-limited '<i>applications should be accompanied by proposals for decommissioning and site restoration, including details of how these measures are expected to be implemented.</i>'	The Statement of Need [APP-206] 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. Proposals for decommissioning and site restoration set out in the Outline DEMP [APP-198], with supporting information in ES Volume 1, Chapter 4 – The Scheme [APP-040] and Section 4.5 of the Planning Statement [APP-209]. The Outline DEMP [APP-198] sets out the general principles to be followed, including an overview of decommissioning activities and programme, prior assessment of environmental impacts, proposed mitigation measures, monitoring and reporting arrangements, and corrective action procedures.
Section 8: Promoting Healthy and Safe Communities		
Paragraph 96	Planning policies and decisions should aim to achieve healthy, inclusive and safe places which: 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	The Human Health Summary Statement within ES Volume 1, Chapter 18—OEM [EN0110014/APP/6.1.18] presents a summary of the potential for likely significant effects on human health as result of the Scheme using ISEP guidance on health. The effects on human health during the construction, operation and maintenance and decommissioning phases are assessed within the ES. Relevant chapters of ES Volume 1 that have considered the effects of the Scheme on human health include: — ES Chapter 6 – Climate Change [EN0110014/APP/6.1.6]; — ES Chapter 7 – Landscape and Visual [EN0110014/APP/6.1.7]; — ES Chapter 8 – Ecology and Biodiversity [EN0110014/APP/6.1.8]; — ES Chapter 9 – Water Environment [EN0110014/APP/6.1.9]; — ES Chapter 11 – Transport and Access [EN0110014/APP/6.1.11]; — ES Chapter 12 – Noise and Vibration [EN0110014/APP/6.1.12]; — ES Chapter 13 – Air Quality [EN0110014/APP/6.1.13]; — ES Chapter 14 – Socio-Economics [EN0110014/APP/6.1.14]; — ES Chapter 15 – Soils and Agriculture [EN0110014/APP/6.1.15]; — ES Chapter 16 – Ground Conditions [EN0110014/APP/6.1.16]; and — ES Chapter 17 – EMF [EN0110014/APP/6.1.17].

Relevant Paragraph	Detail	Scheme Compliance
	accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.	
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 Applicant has provided an Outline PRowPMP [EN0110014/APP/7.8] which sets out measures to mitigate the impact of the Scheme on public rights of way networks. Section 4 of the Outline PRowPMP [EN0110014/APP/7.8] sets out what PRowWs and Permissive Paths may be impacted by the Scheme. As part of the Scheme, three new permissive paths are proposed, together with community accessible space, as set out in the Outline LEMP [EN0110014/APP/7.4].
Section 11: Facilitating the Sustainable Use of Minerals		
Objective	<u>The objective of the policies in this chapter is to ensure there is a sufficient supply of minerals, which are essential to provide the infrastructure, buildings, green energy and goods that the country needs; while restricting peat, coal and onshore oil and gas extraction for environmental reasons. Since minerals are a finite natural resource, and can only be worked where they are found, best use needs to be made of them to secure their long-term conservation.</u>	Minerals resources are considered in ES Volume 3, Appendix 16.2 - Minerals Resource Assessment Desk Study [APP-187]. The presence of the Solar PV arrays and Cable Route Corridors will sterilise minerals within parts of the Order Limits, noting that the sterilisation is temporary in nature during the anticipated 60-year operational lifespan of the Scheme and following decommissioning any economically and commercially viable mineral will once again be accessible. However, these minerals are not presently considered to be economically viable or practical to extract due to a combination of the mineral resource being limited in area or constrained by the presence of nearby designated ecological sites, roads, watercourses and residential properties.
Policy M6: Safeguarding mineral resources and infrastructure through decision making	1. <u>Proposals for non-mineral development should not:</u> a. <u>Constrain potential future use for mineral working in a Mineral Safeguarding Area;</u>	The Scheme is not considered to sterilise minerals deposits in the land surrounding the Order Limits. This is because the proposed Solar PV Arrays and Cable Route Corridors are considered to be of low sensitivity to activities associated with mineral extraction, e.g. traffic, noise and dust (unlike, a proposed residential development for example) and therefore the presence of the Scheme (once constructed) is unlikely to present a constraint to any new mineral extraction in areas adjacent to / near the Order Limits.
Section 142: Achieving well-designed places		
Objective	<u>The objective of the policies in this chapter is to promote high quality, healthy, inclusive</u>	The Design Approach Document [APP-212] 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

Relevant Paragraph	Detail	Scheme Compliance
	<u>and sustainable places, through setting clear expectations about design outcomes and the use of relevant tools and processes.</u>	<u>NPS EN-1. It has been prepared in accordance with the Planning Inspectorate's NSIP Advice Page on Good Design (2025) and clearly sets out the design decisions taken at each step of the Scheme's development, and the rationale for these decisions, as well as the mechanisms by which good design will be secured post consent. This has included the adoption of project level design principles to guide decision making and embed good design outcomes to the Scheme.</u>
<u>Policy DP3: Key principles for well-designed places</u>	<u>Paragraph 1 states that development proposals should respond to their context (the history, character and features of their site and its setting), so that they integrate with and enhance their surroundings</u> <u>Paragraph 2 sets out that: 'To create well-designed places, development proposals should also reflect relevant aspects of the following principles, as appropriate to the nature of the development and its location.' These principles include those related to a. Liveability; b. Climate; c. Nature; d. Movement; e. Built Form; f. Public Space; g. Identity.</u> <u>Paragraphs 3 and 4 - development proposals should be refused if, without clear justification, they conflict with Paragraph 1 of this policy or relevant aspects of Paragraph 2. Substantial weight should be given to compliance with relevant development plan policies. Principles in the Design and Placemaking PPG (draft January 2026) should be used to inform how to apply this policy.</u>	<u>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).</u> <u>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.</u> <u>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.</u> <u>As detailed in the Design Approach Document [APP-212], a project Board Level Design Champion has been appointed to ensure good design is embedded into the Scheme to advocate a good practice design approach and share lessons learned. In addition to the Applicants' Board Level Design Champion, the Applicant also appointed a project level Design Champion to lead the design process and ensure a multi-disciplinary approach. The appointed Design Champion for the Scheme was the landscape architect, who has prior experience in leading the design of other DCO solar projects. The project level Design Champion was responsible for developing the Indicative Masterplan and the Green Infrastructure Strategy</u>
<u>Policy DP4: The design process</u>	<u>Paragraph 1 requires design quality to be considered through the evolution, assessment and delivery of development proposals, including through any pre-application engagement; as outlined in Part 2 of the Design and Placemaking planning practice guidance.</u>	<u>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. The Design Principles, Parameters and Commitments [APP-213] sets out the parameters and commitments for the Scheme that the detailed design must accord with as per Requirement 5 of the Draft DCO [AS-032]. The project level design principles that have informed the Scheme design are set out within the Design Approach Document [APP-212].</u>

Relevant Paragraph	Detail	Scheme Compliance
		<u>As detailed in the Design Approach Document [APP-212] and the Planning Statement [APP-209], 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.</u> <u>As recognised within the design policies set out in the NPSs, the context of any design decisions must reflect the need to efficiently deliver large scale renewable energy infrastructure and therefore the extent to which a Scheme is able to enhance the quality of the local area may be limited. The Scheme has undergone a site selection process as detailed in ES Volume 1, Chapter 5: Reasonable Alternatives and Design Evolution [APP-041] and the Site Selection Assessment [APP-215], and has adopted relevant design principles that enhance the environment within which it is located.</u> <u>The Consultation Report [APP-024] and associated appendices set out engagement that has been undertaken throughout the pre-application stage. This has included engagement with consultees including Norfolk County Council (NCC), South Norfolk Council (SNC) and locally elected members and representatives, local communities, technical officers at NCC and SNC and relevant statutory undertakers. Engagement will continue throughout the examination process.</u> <u>This Report addresses how the Scheme design responds to local and national policies.</u>
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."	The Design Approach Document [EN0110014/APP/7.17] 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. It has been prepared in accordance with the Planning Inspectorate's NSIP Advice Page on Good Design (2025) and clearly sets out the design decisions taken at each step of the Scheme's development, and the rationale for these decisions, as well as the mechanisms by which good design will be secured post consent. This has included the adoption of project level design 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.

Relevant Paragraph	Detail	Scheme Compliance
		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 [EN0110014/APP/7.17], a Design Champion has been appointed to ensure good design is embedded into the Scheme to advocate a good practice design approach and share lessons learned. In addition to the Applicants' board level Design Champion, the Applicant also appointed a project level Design Champion to lead the design process and ensure a multi-disciplinary approach. The appointed Design Champion for the Scheme was the landscape architect, who has prior experience in leading the design of other DCO solar projects. The project level Design Champion was responsible for leading the development of the indicative masterplans presented at the Preliminary Environmental Information Report (PEIR) stage and subsequent iterations following feedback received during statutory consultation, resulting in the Indicative Masterplans submitted with this DCO. These plans outline the site layout and proposed mitigation for the Scheme, which has been developed in close coordination with the Applicant's design team. The Design Principles, Parameters and Commitments [EN0110014/APP/7.18] sets out the parameters and commitments for the Scheme that the detailed design must accord with as per Requirement 5 of the draft DCO [EN0110014/APP/3.1]. The project level design principles that have informed the Scheme design are set out within the Design Approach Document [EN0110014/APP/7.17].
Paragraph 135	Planning policies and decisions should ensure that developments: a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development; b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping; c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);	As detailed in the Design Approach Document [EN0110014/APP/7.17] and the Planning Statement [EN0110014/APP/7.14], 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 NPPs, the context of any design decisions must reflect the need to efficiently deliver large scale renewable energy infrastructure and therefore the extent to which a Scheme is able to enhance the quality of the local area may be limited. The Scheme has undergone a site selection process as detailed in ES Volume 1, Chapter 5: Reasonable Alternatives and Design Evolution [EN0110014/APP/6.1.5] and the Site Selection Assessment [EN0110014/APP/7.20], and has adopted relevant design principles that enhance the environment within which it is located.

Relevant Paragraph	Detail	Scheme Compliance
	d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.	
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.	The Consultation Report [EN0110014/APP/5.1] and associated appendices set out engagement that has been undertaken throughout the pre-application stage. This has included engagement with consultees including Norfolk County Council (NCC), South Norfolk Council (SNC) and locally elected members and representatives, local communities, technical officers at NCC and SNC and relevant statutory undertakers. Engagement will continue throughout the examination process. This Report addresses how the Scheme design responds to local and national policies.
Section 15: Promoting Sustainable Transport		

Relevant Paragraph	Detail	Scheme Compliance
Objective	<u>The objective of the policies in this chapter is to ensure that transport considerations are taken fully into account in the preparation of development plans and the evolution and assessment of development proposals; using a vision-led approach to embed the role that transport infrastructure and choices can play in creating well-designed, sustainable, inclusive and popular places.</u>	<u>The overarching objective of Section 15 of the NPPF aligns with the Project Design Principle 2.8 'Consider the opportunities for peoples' connection to nature, experience and access using quiet lanes, PRoW and recreational routes namely the Boudicca Way and Via Beata Way'; 5.4 'seek to route construction vehicles away from local villages, as far as practicable' and 5.5 'improve connectivity and accessibility through the Sites, where practicable.'</u>
Policy TR3: Locating development in sustainable locations	<u>1. So that development is located where it can support sustainable patterns of movement, enable good accessibility for different users and make the most of existing and proposed transport infrastructure, development proposals should reflect the following principles, taking into account the vision for the site, the type of development and its location . . .</u> <u>d. The environmental impacts of traffic and transport infrastructure should be identified, assessed and taken into account – including taking opportunities to avoid or mitigate any adverse environmental effects, and to secure net environmental gains such as reductions in air pollution; and</u> <u>e. In rural areas, opportunities to improve walking, wheeling, cycling and public transport and enhance the connectivity of an area should be taken where they exist and can be supported by the development proposed.</u>	<u>ES Volume 1, Chapter 11 - Transport and Access [APP-047] aims to secure more sustainable patterns of transport through mitigation measures which are included within the Outline CEMP [APP-196], Outline CTMP [APP-201], Outline OEMP [APP-197], Outline OTMP [APP-202], Outline DEMP [APP-198], Outline PRoWPPMP [APP-203] and are secured via requirements of the Draft DCO [AS-032]. The Outline PRoWPPMP [APP-203] 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. In relation to opportunities to improve walking routes and enhancing the connectivity of the area, the Scheme includes opportunities for advancement, including the proposed approximately 850 linear metres of permissive paths.</u> <u>In relation to opportunities to secure net environmental gains such as reductions in air pollution, mitigation measures to facilitate more sustainable modes of transport are set out in the Outline CTMP [APP-201], which includes a Framework Construction Worker Travel Plan, to promote sustainable transport for workers during the Scheme's construction phase. The potential effects on air quality have been assessed in ES Volume 1, Chapter 13 – Air Quality [APP-049], supported by ES Volume 3, Appendix 13.1 – Construction and Decommissioning Dust Risk Assessment [APP-180]. The assessment considers potential effects from construction and decommissioning road traffic emissions. The overall air quality effects of road traffic emissions during the construction phase on human receptors will be not significant in EIA terms.</u> <u>ES Volume 1, Chapter 11 - Transport and Access [APP-047] concludes no significant adverse effects following an assessment of the effects generated by the Scheme or cumulative effects from other planned or approved schemes on the same receptor (presented in ES Volume 1, Chapter 2 - EIA Methodology [APP-038]) Network providers, including the Local Highways Authority, National Highways have been consulted with regards to the Proposed Development, including relating to the transport effects, as described within the ES Volume 1, Chapter 11 - Transport and Access [APP-047].</u> <u>The expected trip generation from this Scheme is set out in ES Volume 1, Chapter 11 - Transport and Access [APP-047]. The Outline CTMP [APP-201] provides details on delivery scheduling, the approach</u>

Relevant Paragraph	Detail	Scheme Compliance
		is intended to reduce the likelihood of HGVs meeting in opposing directions of narrow sections of the LRN, helping to minimise potential conflict and congestion and maintain road safety. Both the Outline CTMP [APP-201] and the Outline OTMP [APP-202] outlines how AILs will be for managed to avoid disruption during to the network.
<u>Policy TR4: Street design, access, and parking</u>	1. To contribute to creating well-designed places, transport considerations should be integral to the design of development, proposals for which should: d. Allow for the efficient delivery of goods, and ease of access by service and emergency vehicles, in ways which do not compromise key place-making principles (set out in policy DP3(2)); and e. Provide a suitable number of parking spaces for a range of transport modes . . .	Within the Outline CTMP [APP-201], the Outline OTMP [APP-202] and the Outline DEMP [APP-198], the Applicant has included mitigation measures such as signage to avoid on-street 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 within the Outline CTMP [APP-201]. The Outline CTMP [APP-201] and the Outline OTMP [APP-202] 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 Outline CTMP [APP-201] and the Outline OTMP [APP-202], for construction and operation phases, respectively. This will help avoid prolonged queuing and uncontrolled on-street parking. Section 6 of the Outline CTMP [APP-201] and Section 8 of the Outline OTMP [APP-202] 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. Network providers, including the Local Highways Authority, National Highways have been consulted with regards to the Proposed Development, including relating to the transport effects, as described within the ES Volume 1, Chapter 11 - Transport and Access [APP-047]. Where any AIL deliveries require escorts or assistance from the emergency services, 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.
<u>TR6: Assessing transport impacts</u>	1. Development proposals that are likely to generate significant amounts of movement should be supported by: a. A transport statement or transport assessment (depending on the extent and significance of the transport issues involved), which is proportionate to the nature and scale of the development, so that the likely impacts of the proposal for transport can be assessed and monitored; and	ES Volume 1, Chapter 11 - Transport and Access [APP-047] concludes no significant adverse effects following an assessment of the effects generated by the Scheme or cumulative effects from other planned or approved schemes on the same receptor (presented in ES Volume 1, Chapter 2 - EIA Methodology [APP-038]) Network providers, including the Local Highways Authority, National Highways have been consulted with regards to the Proposed Development, including relating to the transport effects, as described within the ES Volume 1, Chapter 11 - Transport and Access [APP-047]. Mitigation measures to facilitate more sustainable modes of transport are included in the Outline CTMP [APP-201] which includes a Framework Construction Worker Travel Plan (FCWTP) which has set out the plan to reduce vehicle impacts associated with construction staff trips on the highway network. This plan encourages the use of sustainable modes of transport, where appropriate, and details measures such as staff shuttle services, provision of parking facilities, and any other proposed measures to reduce

Relevant Paragraph	Detail	Scheme Compliance
	<u>b. A travel plan, which indicates how sustainable transport objectives will be delivered, monitored and managed over time.</u> <u>2. Transport assessments and statements, and travel plans, should reflect the transport vision for the development and the transport strategy for the area in which it is located, and how these are intended to be achieved (including, in the case of travel plans, identifying fallback options if initial measures do not deliver the expected outcomes).</u> <u>3. In assessing movement patterns and potential impacts, including whether they are considered to be severe, reasonable future scenarios should be considered, taking into account impacts at relevant times of the day, potential cumulative impacts, multimodal trip generation and the promotion of sustainable modes of travel, and realising the transport vision for the development itself. Development proposals should be considered having regard to these potential impacts and the other policies in this Framework which are relevant (including TR3, TR4 and DP3(2)(d)).</u> <u>4. Development proposals should be refused if they would have a severe adverse impact on the transport network (in terms of capacity and congestion, including cumulative impacts), or an unacceptable impact on highway safety; taking into account any mitigation measures proposed as well as any wider network improvements, including measures to support sustainable patterns of movement. This applies both during the construction phase and following completion.</u>	<u>mode shift from private car use. A final Construction Worker Travel Plan (CWTP) will be secured as part of the CTMP to be approved pursuant to a Requirement of the DCO.</u> <u>The following aims of the Travel Plan are set out to improve access by active, public and shared transport:</u> <u>• Reduce carbon emissions linked to private car travel by promoting sustainable transport modes such as staff minibuses and walking and cycling where it is practicable;</u> <u>• Encourage efficient travel by adopting shared transport modes, in turn reducing the impact and number of private vehicles;</u> <u>• Ensure the CWTP and relevant measures are communicated to workforce members;</u> <u>• Reduce transport impacts from the Scheme on the local community; and</u> <u>• Improve the health and wellbeing of the workforce by promoting the health benefits of active travel.</u> <u>The Outline CTMP [APP-201] and the Outline OTMP [APP-202] describe how construction and operational freight will access the Site, and the necessary mitigation. These measures include, but are not limited to safety and environment standards programmes, adherence to designated routes, delivery scheduling and monitoring, signage, waiting points and call forward measures, and wheel cleaning facilities. These measures will be adopted where necessary to ensure the safe and effective movement of HGVs and the provision of welfare facilities.</u> <u>The expected trip generation from this Scheme is set out in ES Volume 3, Appendix 11.1 - Transport Assessment [APP-174 to APP-177]. Section 8 of the Outline CTMP [APP-201] sets out the Delivery Management mitigation measures. Where practicable, construction deliveries would be co-ordinated to avoid HGV movements during the traditional peak morning (08:00-09:00) and peak afternoon (17:00-18:00) hours.</u> <u>The Outline OTMP [APP-202] 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 Outline OTMP [APP-202] 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 Volume 1, Chapter 11 - Transport and Access [APP-047].</u>

Relevant Paragraph	Detail	Scheme Compliance
		The Applicant has provided an Access and Rights of Way Plan [APP-011] and an Outline PROWPPMP [APP-203] which set out an overview of the accessible routes and access points available to pedestrians and cyclists.
TR8 Public rights of way Paragraph 1 a and b	1. Development proposals should a. <u>protect and enhance the network of PROWs, including through suitable diversions agreed with the highway authority</u> b. <u>take opportunities to extend, link or improve the quality of existing routes where this enables one or more of the following:</u> i. <u>improved access to green spaces and the countryside</u> ii. <u>new direct and circular routes and connections between local and long distance footpaths, bridleways and cycle routes;</u> iii. <u>provision of accessible, safe and convenient links to services and facilities and;</u> iv. <u>improve connections with public transport and interchanges.</u>	The Applicant has provided an Outline PROWPPMP [APP-203] which sets out measures to mitigate the impact of the Scheme on public rights of way networks. The alignment of existing PROW within the Order Limits has been incorporated into the design of the Scheme. Section 4 of the Outline PROWPPMP [APP-203] sets out what PROWs and Permissive Paths may be impacted by the Scheme. As part of the Scheme, three new permissive paths are proposed, together with community accessible space, as set out in the Outline LEMP [APP-199]. Section 4 of the Outline PROWPPMP [APP-203] sets out what PROWs and Permissive Paths may be impacted by the Scheme and proposes a variety of management measures such as: • <u>Signage will be installed along the PROW to inform users about construction activity. The signs will provide information on construction times and contact details for a public liaison officer;</u> • <u>Drivers must yield to all PROW users, including equestrians;</u> • <u>Where applicable, access tracks will be widened to allow vehicles to pass PROW users safely;</u> • <u>Traffic Marshals or Banksman will be positioned where relevant along a PROW impacted by construction traffic, to hold vehicles if a PROW user is present and advise PROW users of the potential for construction vehicles;</u> • <u>Speeds to be limited to 5-10mph near PROW;</u> • <u>The PROW will be kept clear of construction vehicles and apparatus outside of permitted construction hours so far as is practicable to do so; and</u> • <u>Any damage to the surface of the PROW directly attributable to the Scheme will be repaired as soon as practicable. The surface will be made good and returned to its original condition following construction.</u>
Section 16: Promoting Healthy Communities		
Objective	<u>The objective of the policies is to promote the creation of healthy and inclusive places and support the provision of appropriate public services, by enabling development which can support this aim and seeking to retain, improve and deliver new facilities which are important for community wellbeing and minimising inequalities.</u>	The Human Health Summary Statement within ES Volume 1, Chapter 18 - OEM [APP-054] presents a summary of the potential for likely significant effects on human health as result of the Scheme using ISEP guidance on health. The effects on human health during the construction, operation and maintenance and decommissioning phases are assessed within the ES. Relevant chapters of ES Volume 1 that have considered the effects of the Scheme on human health include: • ES Chapter 6 - Climate Change [APP-042]; • ES Chapter 7 - Landscape and Visual [APP-043];

Relevant Paragraph	Detail	Scheme Compliance
	<u>Policy H4: 'Proposals for new and improved community facilities, public service infrastructure and development providing public health benefits' states that substantial weight should be given to the benefits where new or improved community facilities would be provided and where development proposals would make a demonstrative contribution to promoting good health.</u> <u>Policy HC6: 'Retention of key community facilities and public service infrastructure' establishes that proposals should not result in the loss of community facilities unless specific conditions are met.</u>	• <u>ES Chapter 8 - Ecology and Biodiversity [APP-044];</u> • <u>ES Chapter 9 - Water Environment [APP-045];</u> • <u>ES Chapter 11 - Transport and Access [APP-047];</u> • <u>ES Chapter 12 - Noise and Vibration [APP-048];</u> • <u>ES Chapter 13 - Air Quality [APP-049];</u> • <u>ES Chapter 14 - Socio-Economics [APP-050];</u> • <u>ES Chapter 15 - Soils and Agriculture [APP-051]</u> • <u>ES Chapter 16 - Ground Conditions [APP-052]; and</u> • <u>ES Chapter 17 - EMF [APP-053].</u> <u>There are a number of PRoW and recreational routes through the Scheme and, to facilitate safe access and crossings, it is expected that there will be some temporary closures and diversions. These will be managed through measures incorporated into the Outline PRoWPPMP [APP-203].</u> <u>The Scheme would provide publicly accessible space including approximately 850m of newly created permissive paths that would connect to existing PRoW and collectively help to strengthen the network of greenways and active connections within the landscape. In addition, up to 19.8ha of new community accessible spaces for pedestrian use over the lifetime of the Scheme would be created that could provide potential opportunities for archaeological educational interaction and the capacity for interpretation signage boards and amenity use which could include dog walking, for example. This would positively contribute to amenity and recreational opportunities, with secondary benefits on health and wellbeing. The provision of permissive paths and community accessible space is secured in the Draft DCO [AS-032] and the long-term management set out in the Outline PRoWPPMP [APP-203] and Outline LEMP [APP-199]</u>
<u>Section 17: Pollution, public protection and security</u>		
<u>Objective</u>	<u>The objective of the policies in this chapter is to ensure that new development is appropriate for its location, taking into account risks posed by pollution and other hazards; that any impacts which development might have are taken into account; and that sufficient provision is made for development required for public safety and security.</u>	<u>The effects of noise on human health, including consideration of more vulnerable people, is considered in ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054] and in the Equality Impact Assessment [APP-214]. This assessment on human health concludes that overall, with measures in place, the Scheme is not expected to give rise to significant noise or vibration effects on human health or result in disproportionate impacts on vulnerable groups.</u> <u>ES Volume 3, Appendix 7.11 - Lighting Strategy [APP-151] aims to ensure that external lighting for the Scheme is designed to provide a safe working environment while avoiding unnecessary light pollution and reducing potential effects on the key receptors. The objective is to minimise adverse effects as far as</u>

Relevant Paragraph	Detail	Scheme Compliance
		<u>practicable, while meeting essential safety and security requirements of the Scheme. The Lighting Strategy highlights the mitigation techniques for ensuring that lighting has the least impact as possible.</u> <u>The Human Health Summary Statement within ES Volume 1, Chapter 18 - OEM [APP-054] presents a summary of the potential for likely significant effects on human health as result of the Scheme using ISEP guidance on health. The effects on human health during the construction, operation and maintenance and decommissioning phases are assessed within the ES. Relevant chapters of ES Volume 1 that have considered the effects of the Scheme on human health include:</u> <u>• ES Chapter 6 - Climate Change [APP-042];</u> <u>• ES Chapter 7 - Landscape and Visual [APP-043];</u> <u>• ES Chapter 8 - Ecology and Biodiversity [APP-044];</u> <u>• ES Chapter 9 - Water Environment [APP-045];</u> <u>• ES Chapter 11 - Transport and Access [APP-047];</u> <u>• ES Chapter 12 - Noise and Vibration [APP-048];</u> <u>• ES Chapter 13 - Air Quality [APP-049];</u> <u>• ES Chapter 14 - Socio-Economics [APP-050];</u> <u>• ES Chapter 15 - Soils and Agriculture [APP-051]</u> <u>• ES Chapter 16 - Ground Conditions [APP-052]; and</u> <u>• ES Chapter 17 - EMF [APP-053].</u>
<u>Policy P2: Ground Conditions</u>	<u>1. Sites proposed for development should be suitable for their proposed use taking into account: a. Ground conditions, including any risks arising from land instability or contamination (whether due to natural hazards or current and former activities such as mining or fuel storage); and b. The extent to which any such risks can be mitigated, and the potential impacts on the natural environment arising from remediation.</u> <u>2. Where land is remediated it should, as a minimum, not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990. 3. Adequate site assessment information, prepared by a competent person, should be</u>	<u>A ground conditions and contamination assessment is presented in ES Volume 1, Chapter 16 – Ground Conditions [APP-052] and ES Volume 3, Appendix 16.1 – Ground Conditions Assessment [APP-184 to APP-186]. This considers potential risks and effects from existing ground contamination on human health and controlled waters. With embedded measures secured through the Outline CEMP [APP-196] and Outline DEMP [APP-198], the assessment concludes negligible or minor adverse effects during all phases of the Scheme, which are not deemed to be significant.</u> <u>ES Volume 3, Appendix 16.1 – Ground Conditions Assessment [APP-184 to APP-186] also considers ground stability risk and unexploded ordnance (UXO) risk. Where further assessment and investigations are recommended post consent, for example, to control the risk from UXO, these have been secured in the Outline CEMP [APP-196].</u>

Relevant Paragraph	Detail	Scheme Compliance
	available to inform these considerations. 4. Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.	
<u>Policy P3</u>	1. Development proposals should be appropriate for their location, taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, whether these effects are on or off-site; and whether this is as a result of the development itself or the product of preexisting conditions in its vicinity. In assessing the potential effects of pollution, consideration should be given to the potential sensitivity of the site, and its intended occupiers and users, as well as that of the environment and population in the surrounding area (including where certain groups could be particularly vulnerable to its effects, such as children and older people). Paragraph 2 b states development proposals should not give rise to, or contribute to, an unacceptable level of access to daylight or unacceptable levels of air, noise, artificial light, water, soil, or other forms of pollution on or beyond the site. Adverse impacts should be avoided where possible, or else mitigated to an acceptable degree. (note paragraphs c to f expand on paragraphs b).	The effects of noise on human health, including consideration of more vulnerable people, is considered in a dedicated Human Health Summary Statement within ES Volume 1, Chapter 18 - Other Environmental Matters [APP-054] and in the Equality Impact Assessment [APP-214]. This assessment on human health concludes that overall, with measures in place, the Scheme is not expected to give rise to significant noise or vibration effects on human health or result in disproportionate impacts on vulnerable groups. The potential effects of the Scheme on pollution, health, living conditions and the natural environment have been comprehensively assessed in the Environmental Statement [APP-036 to APP-195], with particular reference to ES Volume 1, Chapter 12 – Noise and Vibration [APP-048], ES Volume 1, Chapter 13 – Air Quality [APP-049], ES Volume 1, Chapter 9 – Water Environment [APP-045], ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051], ES Volume 1, Chapter 16 – Ground Conditions [APP-052], and ES Volume 1, Chapter 17 – Electromagnetic Fields [APP-053]. Each chapter includes an assessment of cumulative effects. ES Volume 3, Appendix 7.11 - Lighting Strategy [APP-151] defines proportionate measures (in context of the nature of the Scheme) to minimise lighting as far as practicable. The suite of management plans secured through Requirements in Schedule 2 of the draft DCO [APP-017] collectively ensure that the Scheme would not give rise to unacceptable levels of air, noise, artificial light, water, soil or other forms of pollution, with adverse impacts avoided where possible or mitigated to an acceptable degree. These include: • <u>Outline CEMP [APP-196];</u> • <u>Outline OEMP [APP-197];</u> • <u>Outline DEMP [APP-198];</u> • <u>Outline CTMP [APP-201];</u> • <u>Outline OTMP [APP-202]; and</u> • <u>Outline BSMP [APP-200].</u>
<u>Policy P4</u>	Paragraph 1 states existing activities (eg business and community facilities) should not have unreasonable restrictions placed on their current or permitted operations.	The Applicant has worked with the landowners of the Sites of the Order Limits in developing the Scheme and the Green Infrastructure Strategy [AS-005] to enable the businesses to continue during the operation of the Scheme and to be converted back to agricultural use following decommissioning; no access to farms will be severed, and the landowners of the Sites have entered into an option agreement, with the farms involved benefitting from the guaranteed income from the diversification of the enterprise base.

Relevant Paragraph	Detail	Scheme Compliance
		<u>Parcels of land within the Sites have been retained for agricultural use, and whilst other land within the Sites would not be available for arable production, the design of the areas with Solar PV Arrays would be compatible with other farming practices, such as sheep grazing. The surrounding land is predominantly agricultural, and the Scheme is not considered to impact the continued use of this land for agricultural purposes, with ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051] concluding no significant adverse residual effects on farm businesses.</u> <u>In relation to community facilities, recreational routes and public rights of way, the Outline CTMP [APP-201], Outline PRowPPMP [APP-203], Outline OTMP [APP-202] and Outline LEMP [APP-199] outline measures to protect PRow, recreational routes and permissive paths during all phases of the Scheme.</u> <u>The layout of the Scheme, and alignment of existing PRow within the Order Limits, has been incorporated into the design, with design buffers/offsets from PRow applied so that the alignment and use of PRow is anticipated to be unaffected during operation of the Scheme.</u>
<u>Policy P5</u>	<u>Paragraph 1 requires development proposals to anticipate and address possible malicious threats and other hazards in relation to, amongst others, a occupiers and users, c. uses which could pose a potential hazard to the surrounding area</u>	<u>The Human Health Summary Statement within ES Volume 1, Chapter 18 - OEM [APP-054] presents a summary of the potential for likely significant effects on human health as result of the Scheme using ISEP guidance on health. The effects on human health during the construction, operation and maintenance and decommissioning phases are assessed within the ES. Relevant chapters of ES Volume 1 that have considered the effects of the Scheme on human health include:</u> <u>• ES Chapter 6 - Climate Change [APP-042];</u> <u>• ES Chapter 7 - Landscape and Visual [APP-043];</u> <u>• ES Chapter 8 - Ecology and Biodiversity [APP-044];</u> <u>• ES Chapter 9 - Water Environment [APP-045];</u> <u>• ES Chapter 11 - Transport and Access [APP-047];</u> <u>• ES Chapter 12 - Noise and Vibration [APP-048];</u> <u>• ES Chapter 13 - Air Quality [APP-049];</u> <u>• ES Chapter 14 - Socio-Economics [APP-050];</u> <u>• ES Chapter 15 - Soils and Agriculture [APP-051]</u> <u>• ES Chapter 16 - Ground Conditions [APP-052]; and</u> <u>• ES Chapter 17 - EMF [APP-053].</u> <u>The Outline Battery Safety Management Plan [APP-200] outlines the key fire safety provisions for the BESS, including measures to reduce BESS failure risks and mitigate credible failure incident scenarios. A plume study has been undertaken as presented in the Outline BSMP [APP-200], which includes</u>

Relevant Paragraph	Detail	Scheme Compliance
		<u>mitigation measures such as the preparation of an Emergency Response Plan (ERP) at detailed design stage that will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider, and the ERP could also contain measures such as notification of potentially affected residents and temporary closure of PRoW.</u> <u>Wider hazards affecting occupiers and users are also addressed through the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline DEMP [APP-198], which set out embedded mitigation for pollution management, safety measures during construction, operation and decommissioning, and the framework for community liaison and complaints handling.</u> <u>In relation to the risk of malicious threats, the Applicant has not identified any relevant considerations relating to national security in relation to the Scheme, and security requirements have been embedded into the design of the Scheme from the outset.</u> <u>ES Volume 3, Appendix 16.1 – Ground Conditions Assessment [APP-184 to APP-186] considers ground contamination, ground stability risk and unexploded ordnance (UXO) risk. A ground investigation will be undertaken post consent. The ground investigation will be designed to allow the further evaluation of the pollutant linkages identified and facilitate design requirements for risk reduction measures, if required.</u> <u>Appropriate mitigation is outlined both within these chapters and also within the Outline CEMP [APP-196], Outline OEMP [APP-197], and the Outline DEMP [APP-198], which are secured by Requirements in Schedule 2 of the Draft DCO [AS-032].</u>
Section 184: <u>Meeting the challenge of climate change, flooding</u>Managing flood risk and coastal change		
Objective F4 assessing flood risk F5 the sequential test F6 development in areas at risk of	<u>The objective of the policies in this chapter is to minimise risks to development arising from all sources of flooding and coastal change, taking into account the impacts of climate change, by steering development away from areas of risk, ensuring that development will be safe for its lifetime without increasing flood risk elsewhere, and incorporating sustainable drainage systems where appropriate.</u> <u>Policy F5 Policy F5: 'The sequential test' aims to steer new development to areas with the lowest risk of flooding from any source. Policy</u>	<u>The Planning Statement [APP-209] sets out the wider benefits of the Scheme beyond making a significant contribution to net zero targets.</u> <u>Green Energy and Climate Change: the Scheme would make a significant and timely contribution to meeting the Government's targets of Clean Power by 2030 and net zero by 2050, together with overall GHG net savings;</u> <u>Landscape, Green Infrastructure and Habitat Creation: the Scheme would strengthen habitat connectivity at a landscape scale and positively contribute to local green infrastructure, together with improving the quality and the extent of habitats;</u> <u>Biodiversity: the Scheme will deliver, as a minimum, 10% BNG.</u>

Relevant Paragraph	Detail	Scheme Compliance
<u>flooding from rivers and sea</u> <u>F7 ensuring development is safe from flooding</u> <u>F8 Sustainable drainage systems and watercourses</u> <u>Annex F managing flood risk and costal change</u>	<i>F5, Paragraph 1 states 'Where the test applies, development proposals should not be located in areas at risk of flooding where alternative sites, appropriate for the development, are reasonably available in areas with a lower risk of flooding.'</i> Policy F5 sets out an exception to requiring a sequential test in Paragraph 2, including where <i>'a site-specific flood risk assessment (FRA) demonstrates clearly that: i. no built development within the site boundary . . . would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk); or ii. Where the site would be at risk of surface water flooding only, the proposed layout, design and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development, without increasing flood risk elsewhere in accordance with policy F7.'</i> Policy F6 Paragraph 1(a) of Policy F6 in relation to areas in Flood Zones 2, 3a, or 3b, states: 'development proposals should be refused if the use is incompatible with the risk from river or sea flooding'. Paragraph 1(b) states <i>'in certain circumstances set out in Annex F, table 33, in addition to satisfying the sequential test in policy F5 where applicable, development will only be appropriate where an 'exception test' is satisfied. The exception test involves demonstrating that the development would meet all the following criteria:</i>	The Sequential Test has been applied during site selection as presented in the Site Selection Assessment [APP-215] and a sequential approach applied to the design and layout of the Scheme as described in the Planning Statement [APP-209] by directing the most vulnerable aspects of the Scheme to areas of lowest flood risk as far as practicable. The project level design principles in the Design Approach Document [APP-212] include commitments to reduce carbon emissions during all phases of the Scheme, together with retention and enhancement of existing vegetation, as far as practicable and to manage surface water drainage. Flexibility is sought in the design for resilience and adaptation to climate change through the design process. As set out in ES Volume 1, Chapter 9 - Water Environment [APP-045], a sequential approach to the siting of infrastructure has been applied, with infrastructure located outside areas of highest flood risk as far as reasonably practicable. A Sequential Test and Exception Test is presented in the Planning Statement [APP-209]. The Sequential Test has been applied during site selection as presented in the Site Selection Assessment [APP-215] and a sequential approach applied to the design and layout of the Scheme as described in the Planning Statement [APP-209] by directing the most vulnerable aspects of the Scheme to areas of lowest flood risk as far as practicable. The Applicant has considered flooding in the design of the Scheme to minimise the risk of flooding both to and from the Scheme. The most vulnerable elements of infrastructure, being the National Grid Substation, the BESS and Project Substations (along with the Solar PV Arrays) would be sited in areas of Flood Zone 1, at lower risk of flooding and outside of significant areas of surface water flood risk/flow routes. Localised areas of surface water flood risk are present however these will be captured within the proposed surface water drainage systems for these elements of the Scheme. This is secured through the Works Plan [AS-002 and AS-003]. The Scheme components within Flood Zones 2 and 3 would therefore relate to electrical cabling, fencing, access and maintenance tracks, together with landscape and biodiversity mitigation and enhancement measures. For the Exception Test, substantial wider sustainability benefits of the Scheme are set out in the Planning Statement [APP-209], together with the proposed measures that have been incorporated into the Scheme design to ensure that the Scheme is safe from flooding for its lifetime and will not increase the risk of flooding elsewhere.

Relevant Paragraph	Detail	Scheme Compliance
	<u>i. Provide wider sustainability benefits to the community that outweigh the flood risk;</u> <u>ii. Be safe for its anticipated lifetime in accordance with policy F7; and</u> <u>iii. Not increase flood risk elsewhere and, where possible, reduce flood risk overall.'</u> Policy F7 'Ensuring development is safe from flooding' sets out overarching requirements for new development to demonstrate it is safe and does not increase flood risk elsewhere. Paragraph 1 states that: 'Development proposals should not present a risk from flooding to potential occupiers, users, or visitors, and should not increase flood risk elsewhere'. Policy F7 Paragraph 2 further states: 'where development is proposed in a location known to be at risk from any form of flooding, now or in the future, it should be refused unless: <u>'a) Within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons which justify a different arrangement;</u> <u>b) The development will be safe throughout its lifetime taking account of the vulnerability of its users;</u> <u>c) Any residual risk can be safely managed, and safe access and escape routes are included where appropriate, as part of an agreed emergency plan;</u> <u>d) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be</u>	The Applicant has applied both the Sequential and Exception Tests and demonstrated how these have been met. While some components extend into areas designated as 'high' risk of surface water flooding, these are limited to the Solar PV arrays only, which are raised above ground level on pile-driven steel supports. The supports are of a narrow profile and result in a negligible increase in impermeable area, typically less than 1% of the total Order Limits. Other design elements include: <u>Concrete footings for Solar PV Arrays will be limited to areas of where there is a requirement to protect any underground assets/resources e.g. archaeological remains;</u> <u>Sensitive electrical infrastructure (e.g. transformers, inverters, switchgear) and welfare cabins will be set located outside of and set at an adequate freeboard above the EA modelled fluvial floodplain, and above surrounding ground level to mitigate against surface water ingress in extreme rainfall events;</u> <u>The Solar Panel PV Arrays will intercept some rainfall before it reaches the ground. The intercepted rainfall will either run down the face of the arrays and drip into the ground/onto vegetation below via the multiple gaps across the arrays or will be lost due to evaporation from the face of the panels;</u> <u>The land underneath and between the rows of Solar PV Arrays will be sown as grassland/wildflower meadow which will be maintained to a suitable height using machinery such that the plants will slow the rate of contact between rainfall and the soil through this phase of the Scheme. The provision of ground cover across the Order Limits year-round will reduce soil erosion, contribute to greater interception/evapotranspiration of rainfall and increase ground roughness across the fields, thereby slowing the rate of runoff across the Order Limits and reducing flooding to villages located at the bottom of drainage catchments.</u> Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [AS-018] takes into account flood risk from all sources of flooding, taking into account projected impacts of climate change. This includes outline drainage strategies and appropriate treatment stages before runoff is discharged for the National Grid Substation, BESS and Project Substations. The ground beneath the Solar PV Arrays will be covered by grass and/or wildflower meadow which will be maintained to a suitable height using machinery will slow the rate of contact between rainfall and the soil. Section 9.2 of ES Volume 1, Chapter 9 - Water Environment [APP-045] sets out that the Applicant has been in consultation with Anglian Water, the Environment Agency, Natural England, South Norfolk Council and Norfolk County Council (the LLFA) in relation to the water environment. The Applicant has

Relevant Paragraph	Detail	Scheme Compliance
	<u>quickly brought back into use without significant refurbishment; and</u> <u>e) it can be demonstrated that flood risk will not be increased elsewhere'</u> Policy F8 'Sustainable drainage systems and watercourses' promotes the use of Sustainable Drainage Systems (SuDS) in new development to mitigate impacts to surface water surface water discharge and to provide wider benefits, and sets out general policies for maintaining/enhancing existing watercourses	considered the advice provided within the consultation, and taken this into account, as described within Chapter 9. ES Volume 3, Appendix 9.1 - FRA and Outline Surface Water Drainage Strategy [AS-018] confirms that the outline surface water drainage strategy has been prepared in accordance with the guidance outlined in the CIRIA 'The SuDS Manual' C753. The strategy will be developed further at the detailed design stage, which will be secured as part of the DCO. This will further detail the maintenance arrangements.
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.	The Statement of Need [EN0110014/APP/7.11] confirms large scale solar is a proven technology, capable of delivery at scale against the timeframes required to deliver net zero. The Scheme will, if consented, bring forward large scale ground mount solar with co-located energy storage facilities and will make a critical contribution towards net zero and timely contribution to meeting the Government's targets of Clean Power by 2030.
Paragraph 163	The need to mitigate and adapt to climate change should also be considered in preparing and assessing planning applications, taking into account the full range of potential climate change impacts.	ES Volume 1, Chapter 6—Climate Change [EN0110014/APP/6.1.6] sets out measures to mitigate the impact of higher temperatures on the Scheme. The Scheme would be designed to be adaptive and resilient to climate change. The provision of all year round grassland/wildflower meadow beneath the Solar PV Arrays will reduce soil erosion, contribute to greater interception/evapotranspiration of rainfall and increase ground roughness across the fields, thereby slowing the rate of runoff across Sites. This would reduce flooding to villages located at the bottom of drainage catchments. 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 Outline CEMP [EN0110014/APP/7.1] and Outline OEMP [EN0110014/APP/7.2].

Relevant Paragraph	Detail	Scheme Compliance
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 Planning Statement [EN0110014/APP/7.14] sets out the wider benefits of the Scheme beyond making a significant contribution to net zero targets. - Green Energy and Climate Change: the Scheme would make a significant and timely contribution to meeting the Government's targets of Clean Power by 2030 and net zero by 2050, together with overall GHG net savings; - Landscape, Green Infrastructure and Habitat Creation: the Scheme would strengthen habitat connectivity at a landscape scale and positively contribute to local green infrastructure, together with improving the quality and the extent of habitats; - Biodiversity: the Scheme will deliver, as a minimum, 10% BNG. The Sequential Test has been applied during site selection as presented in the Site Selection Assessment [EN0110014/APP/7.20] and a sequential approach applied to the design and layout of the Scheme as described in the Planning Statement [EN0110014/APP/7.14] by directing the most vulnerable aspects of the Scheme to areas of lowest flood risk as far as practicable. The project level design principles in the Design Approach Document [EN0110014/APP/7.17] include commitments to reduce carbon emissions during all phases of the Scheme, together with retention and enhancement of existing vegetation, as far as practicable and to manage surface water drainage. Flexibility is sought in the design for resilience and adaptation to climate change through the design process.
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;	The Statement of Need [EN0110014/APP/7.11] 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.
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	As set out in ES Volume 1, Chapter 9 – Water Environment [EN0110014/APP/6.1.9], a sequential approach to the siting of infrastructure has been applied, with infrastructure located outside areas of highest flood risk as far as reasonably practicable.

Relevant Paragraph	Detail	Scheme Compliance
	development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.	A Sequential Test and Exception Test is presented in the Planning Statement [EN0110014/APP/7.14] .
Paragraph 173	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.	The Sequential Test has been applied during site selection as presented in the Site Selection Assessment [EN0110014/APP/7.20] and a sequential approach applied to the design and layout of the Scheme as described in the Planning Statement [EN0110014/APP/7.14] by directing the most vulnerable aspects of the Scheme to areas of lowest flood risk as far as practicable. The Applicant has considered flooding in the design of the Scheme to minimise the risk of flooding both to and from the Scheme. The most vulnerable elements of infrastructure, being the National Grid Substation, the BESS and Project Substations (along with the Solar PV Arrays) would be sited in areas of Flood Zone 1, at lower risk of flooding. This is secured through the Works Plan [EN0110014/APP/2.3]. The Scheme components within Flood Zones 2 and 3 would therefore relate to electrical cabling, fencing, access and maintenance tracks, together with landscape and biodiversity mitigation and enhancement measures.
Paragraph 174	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.	
Paragraph 175	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).	
Paragraph 177	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.	

Relevant Paragraph	Detail	Scheme Compliance
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; e) 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.	Where elements are located within areas of highest flood risk, these are limited to the Solar PV arrays only, which are raised above ground level on pile-driven steel supports. The supports are of a narrow profile and result in a negligible increase in impermeable area, typically less than 1% of the total Order Limits. Other design elements include: - Concrete footings for Solar PV Arrays will be limited to areas of where there is a requirement to protect any underground assets/resources e.g. archaeological remains; - Sensitive electrical infrastructure (e.g. transformers, inverters, switchgear) and welfare cabins will be set located outside of and set at an adequate freeboard above the EA modelled fluvial floodplain, and above surrounding ground level to mitigate against surface water ingress in extreme rainfall events; - The Solar Panel PV Arrays will intercept some rainfall before it reaches the ground. The intercepted rainfall will either run down the face of the arrays and drip into the ground/onto vegetation below via the multiple gaps across the arrays or will be lost due to evaporation from the face of the panels; - The land underneath and between the rows of Solar PV Arrays will be sown as grassland/wildflower meadow which will be maintained to a suitable height using machinery such that the plants will slow the rate of contact between rainfall and the soil through this phase of the Scheme. The provision of ground cover across the Order Limits year round will reduce soil erosion, contribute to greater interception/evapotranspiration of rainfall and increase ground roughness across the fields, thereby slowing the rate of runoff across the Order Limits and reducing flooding to villages located at the bottom of drainage catchments;
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	Volume 3, Appendix 9.1 – Flood Risk Assessment & Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1] takes into account flood risk from all sources of flooding, taking into account projected impacts of climate change. This includes outline drainage strategies and appropriate treatment stages before runoff is discharged for the National Grid Substation, BESS and Project Substations. The ground beneath the Solar PV Arrays will be covered by grass and/or wildflower meadow which will be maintained to a suitable height using machinery will slow the rate of contact between rainfall and the soil.

Relevant Paragraph	Detail	Scheme Compliance
	improvements in water quality and biodiversity, as well as benefits for amenity. Sustainable drainage systems provided as part of proposals for major development should: a) take account of advice from the Lead Local Flood Authority; b) have appropriate proposed minimum operational standards; and e) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development."	Section 9.2 of ES Volume 1, Chapter 9 – Water Environment [EN0110014/APP/6.1.9] sets out that the Applicant has been in consultation with Anglian Water, the Environment Agency, Natural England, South Norfolk Council and Norfolk County Council (the LLFA) in relation to the water environment. The Applicant has considered the advice provided within the consultation, and taken this into account, as described within Chapter 9. ES Volume 3, Appendix 9.1 – FRA and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1] confirms that the outline surface water drainage strategy has been prepared in accordance with the guidance outlined in the CIRIA 'The SuDS Manual' C753. The strategy will be developed further at the detailed design stage, which will be secured as part of the DCO. This will further detail the maintenance arrangements.
Section 15: Conserving and enhancing the natural environment		
<u>Objective</u>	The objective of the policies in this chapter is to influence the design and location of new development to help drive nature's recovery and contribute to wider environmental outcomes, safeguarding our most important habitats, species and landscapes and recognising the centrality of natural capital to delivering sustainable growth.	ES Volume 1, Chapter 5 - Reasonable Alternatives and Design Evolution [APP-041] and the Site Selection Assessment [APP-215] 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 Volume 1, Chapter 7 – Landscape and Visual [APP-043] presents an assessment of the likely significant effects during all phases of the Scheme.
<u>Policy N2: improving the natural environment</u>	Policy N2 relates to: a. Consideration of environmental qualities of land proposed for development b. Take account of the quality of agricultural land and use of poorer quality land where possible c. Taking opportunities to connect to and strengthen ecological networks beyond the site	As set out in Table 7.14 of ES Volume 1, Chapter 7 – Landscape and Visual [APP-043], significant residual adverse effects have been identified on the landscape character and also on features within the Order Limits during the construction, operation and decommissioning phases. After Year 15 of operation, the number of landscape receptors with a significant residual adverse effect would reduce to 6 receptors compared to 13 receptors at Year 1 of operation. Significant residual adverse effects on the landscape character and features would remain in relation to the BESS Site, Site 1, Site 7 and Site 8. The landscape designations were considered in the site selection process as set out in the Site Selection Assessment [APP-215] and the landscape and visual context of the Order Limits in the design approach to the Scheme described in the Design Approach Document [APP-212]. National Parks and National Landscapes are not located in the Order Limits.

Relevant Paragraph	Detail	Scheme Compliance
	<u>d. Conserve and enhance natural features of value where possible, using landscaping</u> <u>e. Use green infrastructure and nature-based solutions to secure multiple benefits such as for biodiversity, surface water and pollution management, climate change and recreation</u> <u>f. Minimise adverse impacts on biodiversity and include features which support priority or threatened species</u> <u>g. Ensure that green infrastructure and other features are located and designed to minimise future risk of failure and measures in place for long term management</u>	<u>ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044] has been produced taking due consideration for the appropriate weighting for designated sites of international, national and local importance; protected species; habitats and other species of principal importance for the conservation of biodiversity. With the sensitivity weighting established, ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044] presents an assessment which concludes no significant adverse residual effects with mitigation in place.</u> <u>Owing to the nature of the land quality within the Order Limits and on a wider scale, as reported in ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051], land within the Order Limits includes areas of BMV quality land. Previously developed land and BMV quality land has been considered as part of the site selection process as set out in the Site Selection Assessment [APP-215]. The results of the ALC surveys and impacts of the Scheme on BMV land is provided in ES Volume 1, Chapter 15 - Soils and Agricultural Land [APP-051].</u> <u>The Applicant has taken steps to avoid, reduce, and subsequently mitigate impacts on BMV as set out in the ES Volume 1, Chapter 15 – Soils and Agricultural Land [APP-051], Planning Statement [APP-209] and Design Approach Document [APP-212]. Further, as part of the design of the Scheme, parcels of land within the Sites have been retained for agricultural use. Whilst other land within the Sites would not be available for arable production, the design of the areas with Solar PV Arrays would be compatible with other farming practices, such as sheep grazing.</u> <u>An Outline Soils Resource Management Plan [APP-204] (Outline SRMP) has been submitted with the DCO Application to manage soils as a resource and minimise adverse impacts during the construction and decommissioning phases of the Scheme.</u> <u>The Scheme will deliver, as a minimum, 10% BNG, as set out in the Biodiversity Net Gain Report [APP-218]. The ecological mitigation and enhancement within the Scheme will deliver a potential net gain of 37.42% for habitats, a net gain of 31.35% for hedgerows and 16.08% for watercourses.</u>
<u>Policy N6</u>	<u>Paragraph 1 sets out the conditions in which development affecting sites of international, national, and local importance can be supported.</u> <u>Paragraph 2. Irrespective of a site's status in nature conservation terms, development proposals which would entail the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran</u>	<u>Details of how the Scheme has sought to avoid harm to biodiversity and incorporate opportunities to conserve and enhance biodiversity are set out in ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044].</u> <u>There are no national statutory ecological designations within the Order Limits, however, 10 SSSI are located within 5km of the Order Limits. ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044] sets out an assessment of the likely effects of the Scheme on SSSI. With embedded measures in place, concludes, no significant residual adverse effects on SSSI.</u>

Relevant Paragraph	Detail	Scheme Compliance
	<u>trees) should be refused, unless there are wholly exceptional reasons⁶² and a suitable compensation strategy exists.</u> <u>Paragraph 3. This policy applies to development on land inside or outside a designated area, if it would have an impact on the identified biodiversity or geodiversity value of the area concerned</u>	<u>No irreplaceable habitat (Ancient Woodland, veteran trees and lowland fen) is proposed to be removed as a result of the Scheme with avoidance measures proposed including offset buffers and Avoidance Areas. With adherence to embedded measures in the Outline CEMP [APP-196], Outline OEMP [APP-197] and Outline LEMP [APP-199], with the latter to make sure the long-term protection and health of veteran trees, ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044] concludes no significant residual effects on irreplaceable habitats.</u> <u>ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044] identifies Important Ecological Features and Protected Species within the Order Limits. With adherence to embedded measures in the Outline CEMP [APP-196] and Outline OEMP [APP-197], no significant adverse effects have been identified during all phases of the Scheme. The assessment concludes, however, significant beneficial effects during the operational phase on specific habitats and some protected species with the implementation of the Outline LEMP [APP-199].</u> <u>The Scheme will deliver, as a minimum, 10% BNG, as set out in the Biodiversity Net Gain Report [APP-218]. The ecological mitigation and enhancement within the Scheme will deliver a potential net gain of 37.42% for habitats, a net gain of 31.35% for hedgerows and 16.08% for watercourses.</u> <u>ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044] 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.</u> <u>ES Volume 1, Chapter 8 - Ecology and Biodiversity [APP-044] outlines the summary of biodiversity inter-project cumulative effects, including residual significant effects, in EIA terms. The section concludes that -taking into account the proposed embedded mitigation measures, the -residual impacts as a result of the construction, operational and maintenance and decommissioning phases of the Scheme are not likely to be significant. On this basis there is no mechanism for cumulative effects on any other development/scheme as identified on the short-list provided in ES Vol 3.1, Appendix 2.4 Cumulative Schemes [APP-116], nor will the Scheme result in a cumulative effect on those Important Ecological Features considered within the chapter.</u>
Paragraph 187	<u>Planning policies and decisions should contribute to and enhance the natural and local environment by:</u> <u>a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate</u>	<u>ES Volume 1, Chapter 5— Reasonable Alternatives and Design Evolution [EN0110014/APP/6.1.5] and the Site Selection Assessment [EN0110014/APP/7.20] 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.</u>

Relevant Paragraph	Detail	Scheme Compliance
	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; e) 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.	ES Volume 1, Chapter 7—Landscape and Visual [EN0110014/APP/6.1.7] presents an assessment of the likely significant effects during all phases of the Scheme. As set out in Table 7.14 of ES Volume 1, Chapter 7—Landscape and Visual [EN0110014/APP/6.17], significant residual adverse effects have been identified on the landscape character and also on features within the Order Limits during the construction, operation and decommissioning phases. After Year 15 of operation, the number of landscape receptors with a significant residual adverse effect would reduce to 6 receptors compared to 13 receptors at Year 1 of operation. Significant residual adverse effects on the landscape character and features would remain in relation to the BESS Site, Site 1, Site 7 and Site 8. ES Volume 1, Chapter 8—Ecology and Biodiversity [EN0110014/APP/6.1.8] has been produced taking due consideration for the appropriate weighting for designated sites of international, national and local importance; protected species; habitats and other species of principal importance for the conservation of biodiversity. With the sensitivity weighting established, ES Volume 1, Chapter 8—Ecology and Biodiversity [EN0110014/APP/6.1.8] presents an assessment which concludes no significant adverse residual effects with mitigation in place. Land within the Order Limits includes areas of BMV quality land. Previously developed land and BMV quality land has been considered as part of the site selection process as set out in the Site Selection Assessment [EN0110014/APP/7.20]. The results of the ALC surveys and impacts of the Scheme on BMV land is provided in ES Volume 1, Chapter 15—Soils and Agricultural Land [EN0110014/APP/6.1.15]. The Scheme will deliver, as a minimum, 10% BNG, as set out in the Biodiversity Net Gain Report [EN0110014/APP/7.23]. The ecological mitigation and enhancement within the Scheme will deliver a potential net gain of 37.42% for habitats, a net gain of 31.35% for hedgerows and 16.08% for watercourses. Along within many factors, BMV quality land was a consideration in the design evolution of the Scheme. During the design process, the Applicant sought to, where practicable, reduce the use of BMV quality land within the Solar PV Array areas, including for example, removal of pockets of BMV quality land from the Solar PV Arrays within Site 3, Sub-Site 5B, Site 6 and Sub-Site 8A during the design process. Sub-Site 3A was entirely removed from the Order Limits owing to several factors, including its agricultural land quality (largely Grade 2). Such examples are set out in the Design Approach Document [EN0110014/APP/7.17].

Relevant Paragraph	Detail	Scheme Compliance
		ES Volume 3, Appendix 16.1 – Ground Conditions Assessment [EN0110014/APP/6.3.16.1] considers ground contamination, ground stability risk and unexploded ordnance (UXO) risk. A ground investigation will be undertaken post consent. The ground investigation will be designed to allow the further evaluation of the pollutant linkages identified and facilitate design requirements for risk reduction measures, if required. Appropriate mitigation is outlined both within these chapters and also within the Outline CEMP [EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2], and the Outline DEMP [EN0110014/APP/7.3], which are secured by Requirements in Schedule 2 of the draft DCO [EN0110014/APP/3.1].
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 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.	The landscape designations were considered in the site selection process as set out in the Site Selection Assessment [EN0110014/APP/7.20] and the landscape and visual context of the Order Limits in the design approach to the Scheme described in the Design Approach Document [EN0110014/APP/7.17]. National Parks, the Broads and National Landscapes are not located in the Order Limits.
Footnote 65	Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.	Owing to the nature of the land quality within the Order Limits and on a wider scale, as reported in ES Volume 1, Chapter 15 – Soils and Agricultural Land [EN0110014/APP/6.15], it has not been possible to avoid BMV quality land entirely. The Applicant has taken steps to avoid, reduce, and subsequently mitigate impacts on BMV as set out in the ES Volume 1, Chapter 15 – Soils and Agricultural Land [EN0110014/APP/6.15], Planning Statement [EN0110014/APP/7.14] and Design Approach Document [EN0110014/APP/7.17]. Along with many factors, BMV quality land was a consideration in the design evolution of the Scheme. During the design process, the Applicant sought to, where practicable, reduce the use of BMV quality land within the Solar PV Array areas, including for example, removal of pockets of BMV quality land from the Solar PV Arrays within Site 3, Sub Site 5B, Site 6 and Sub Site 8A during the design process. Sub Site 3A was entirely removed from the Order Limits owing to several factors, including its agricultural land

Relevant Paragraph	Detail	Scheme Compliance
		quality (largely Grade 2). Such examples are set out in the Design Approach Document [EN0110014/APP/7.17]. Further, as part of the design of the Scheme, parcels of land within the Sites have been retained for agricultural use. Whilst other land within the Sites would not be available for arable production, the design of the areas with Solar PV Arrays would be compatible with other farming practices, such as sheep grazing. An Outline Soils Resource Management Plan [EN0110014/APP/7.9] (Outline SRMP) has been submitted with the DCO Application to manage soils as a resource and minimise adverse impacts during the construction and decommissioning phases of the Scheme.
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	Details of how the Scheme has sought to avoid harm to biodiversity and incorporate opportunities to conserve and enhance biodiversity are set out in ES Volume 1, Chapter 8 – Ecology and Biodiversity [EN0110014/APP/6.1.8]. There are no national statutory ecological designations within the Order Limits, however, 10 SSSI are located within 5km of the Order Limits. ES Volume 1, Chapter 8 – Ecology and Biodiversity [EN0110014/APP/6.1.8] sets out an assessment of the likely effects of the Scheme on SSSI. With embedded measures in place, concludes, no significant residual adverse effects on SSSI. No irreplaceable habitat (Ancient Woodland, veteran trees and lowland fen) is proposed to be removed as a result of the Scheme with avoidance measures proposed including offset buffers and Avoidance Areas. With adherence to embedded measures in the Outline CEMP [EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2] and Outline LEMP [EN0110014/APP/7.4], with the latter to make sure the long-term protection and health of veteran trees, ES Volume 1, Chapter 8 – Ecology and Biodiversity [EN0110014/APP/6.1.8] concludes no significant residual effects on irreplaceable habitats. ES Volume 1, Chapter 8 – Ecology and Biodiversity [EN0110014/APP/6.1.8] identifies Important Ecological Features and Protected Species within the Order Limits. With adherence to embedded measures in the Outline CEMP [EN0110014/APP/7.1] and Outline OEMP [EN0110014/APP/7.2], no significant adverse effects have been identified during all phases of the Scheme. The assessment concludes, however, significant beneficial effects during the operational phase on specific habitats and some protected species with the implementation of the Outline LEMP [EN0110014/APP/7.4]. The Scheme will deliver, as a minimum, 10% BNG, as set out in the Biodiversity Net Gain Report [EN0110014/APP/7.23]. The ecological mitigation and enhancement within the Scheme will deliver a

Relevant Paragraph	Detail	Scheme Compliance
	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	potential net gain of 37.42% for habitats, a net gain of 31.35% for hedgerows and 16.08% for watercourses
Paragraph 195	The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.	ES Volume 1, Chapter 8 – Ecology and Biodiversity [EN0110014/APP/6.1.8] 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 Volume 1, Chapter 8 – Ecology and Biodiversity [EN0110014/APP/6.1] outlines the summary of biodiversity inter-project cumulative effects, including residual significant effects, in EIA terms. The section concludes that taking into account the proposed embedded mitigation measures, the residual impacts as a result of the construction, operational and maintenance and decommissioning phases of the Scheme are not likely to be significant. On this basis there is no mechanism for cumulative effects on any other development/scheme as identified on the short list provided in ES Vol 31, Appendix 2.4 Cumulative Schemes [EN0110014/APP/6.3.2.4], nor will the Scheme result in a cumulative effect on those Important Ecological Features considered within the chapter.
Paragraph 197	Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.	
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:	The effects of noise on human health, including consideration of more vulnerable people, is considered in ES Volume 1, Chapter 18 – Other Environmental Matters [EN0110014/APP/6.1.12] and in the Equality Impact Assessment [EN0110014/APP/7.19]. This assessment on human health concludes that overall, with measures in place, the Scheme is not expected to give rise to significant noise or vibration effects on human health or result in disproportionate impacts on vulnerable groups. ES Volume 3, Appendix 7.11 – Lighting Strategy [EN0110014/APP/6.3.7.11] aims to ensure that external lighting for the Scheme is designed to provide a safe working environment while avoiding unnecessary light pollution and reducing potential effects on the key receptors. The objective is to

Relevant Paragraph	Detail	Scheme Compliance
	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."	minimise adverse effects as far as practicable, while meeting essential safety and security requirements of the Scheme. The Lighting Strategy highlights the mitigation techniques for ensuring that lighting has the least impact as possible. The Human Health Summary Statement within ES Volume 1, Chapter 18—OEM [EN0110014/APP/6.1.18] presents a summary of the potential for likely significant effects on human health as result of the Scheme using ISEP guidance on health. The effects on human health during the construction, operation and maintenance and decommissioning phases are assessed within the ES. Relevant chapters of ES Volume 1 that have considered the effects of the Scheme on human health include: • ES Chapter 6—Climate Change [EN0110014/APP/6.1.6];— • ES Chapter 7—Landscape and Visual [EN0110014/APP/6.1.7];— • ES Chapter 8—Ecology and Biodiversity [EN0110014/APP/6.1.8];— • ES Chapter 9—Water Environment [EN0110014/APP/6.1.9];— • ES Chapter 11—Transport and Access [EN0110014/APP/6.1.11];— • ES Chapter 12—Noise and Vibration [EN0110014/APP/6.1.12];— • ES Chapter 13—Air Quality [EN0110014/APP/6.1.13];— • ES Chapter 14—Socio-Economics [EN0110014/APP/6.1.14];— • ES Chapter 15—Soils and Agriculture [EN0110014/APP/6.1.15];— • ES Chapter 16—Ground Conditions [EN0110014/APP/6.1.16]; and— • ES Chapter 17—EMF [EN0110014/APP/6.1.17].—
Section <u>2046</u>: Conserving and enhancing the historic environment		
<u>Objective</u>	<u>The objective of the policies in this chapter is to conserve and enhance the historic environment. Heritage assets are an irreplaceable resource, and range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.</u>	<u>The objective of the NPPF Section 20 aligns with the Scheme Design Principle 2.7 to 'Consider the setting of heritage assets and mitigate any impact by design, where practicable' as set out within the Design Approach Document [APP-212].</u>

Relevant Paragraph	Detail	Scheme Compliance
<u>Policy HE4</u>	<u>1. Heritage assets, as an irreplaceable resource, should be conserved in a manner appropriate to their significance. To achieve this, development proposals which would affect the significance of heritage assets, including any contribution made by their setting should:</u> <u>a. Maintain or secure a use consistent with their conservation, taking into account the importance of maintaining the assets, the positive contribution they can make to sustainable communities including local economies, and the positive contribution they can make to local character and distinctiveness; and</u> <u>b. Avoid (or if that is not possible, minimise) harm to the significance of heritage assets, and instead conserve this significance.</u> <u>2. Any harm to, or loss of, the significance of a designated heritage asset (including from development within its setting) should have a clear and convincing justification in accordance with the policies in this chapter.</u>	<u>ES Volume 1, Chapter 10 - Cultural Heritage [APP-046] 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.</u> <u>ES Volume 1, Chapter 10 - Cultural Heritage [APP-046] concludes that following the implementation of embedded and additional mitigation measures there will be no residual significant effects on any designated or non-designated assets as a result of the Scheme. Embedded mitigation measures, such as removal of solar PV from fields due to heritage sensitivities, have reduced any potential significant adverse effects.</u>
<u>Policy HE5</u>	<u>1. Development proposals affecting heritage assets should be accompanied by an assessment of the significance of the assets affected (including any contribution made by their setting) and of the potential effect of the proposal on their significance. The level of detail should be proportionate to the assets' importance and no more than is necessary to understand the potential effect of the proposal on their significance. The relevant historic environment record should be referred to in making this assessment, and appropriate expertise employed where necessary.</u>	<u>ES Volume 1, Chapter 10 - Cultural Heritage [APP-046] 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.</u> <u>ES Volume 1, Chapter 10 - Cultural Heritage [APP-046] outlines that 'substantial harm' is afforded to any adverse effect that is of a high magnitude of impact, whilst a low to medium magnitude of impact would represent 'less than substantial harm'. The Chapter concludes that following embedded mitigation, there will be no harm to the majority of designated heritage assets and no harm to all the non-designated heritage assets.</u>

Relevant Paragraph	Detail	Scheme Compliance
	<u>2. Assessments of the potential effects of development proposals on the significance of heritage assets (including through effects on their setting) should identify whether proposals would be likely to:</u> <u>a. Have a positive effect, which is where the significance of a heritage asset would be enhanced, or better revealed; or</u> <u>b. Have no effect on the significance of a heritage asset; or</u> <u>c. Result in harm to the significance of a heritage asset, either from work affecting the asset itself or from development within its setting. The degree of harm should be identified: substantial harm would occur where the development proposal would seriously affect a key element of the asset's significance; or</u> <u>d. Cause the total loss of the significance of a heritage asset.</u> <u>3. In making this assessment it is the effect on a heritage asset's significance rather than the scale of the development which should be considered. . .</u> <u>5. Where a development proposal involves, or has the potential to involve, a heritage asset with archaeological interest, an appropriate desk-based assessment should be undertaken and, where necessary, a field evaluation. These should be used to help understand the asset's significance and the potential effect of the proposal on this, which should inform the design, mitigation and implementation of the development.</u>	<u>Substantial harm to, or total loss of, any designated heritage assets' significance as a result of the Scheme is not anticipated. Therefore, the policy tests regarding substantial harm outlined in both the NPS EN-1 and the NPPF (2026) Policy HE5 do not apply.</u> <u>For two designated heritage assets, Moulton Farmhouse and Barn Cottages Grade II listed buildings, the assessment found minor adverse/negligible effects owing to the change in the settings. The level of harm caused by this impact is considered to be 'less than substantial harm' at the lower end of the scale (in terms of NPS EN-1 / EN-3, which is now classified as harm at the lower end of the scale of harm in NPPF terms). For Barn Cottages, this will be reduced to no harm once the landscaping screening has matured.</u> <u>ES Volume 1, Chapter 10 - Cultural Heritage [APP-046] sets out the existing baseline conditions, including heritage assets with an archaeological interest. This was informed by:</u> <u>• ES Volume 3, Appendix 10.1 - Heritage Statement [APP-165 to APP-168]</u> <u>• ES Volume 3, Appendix 10.2 - Archaeological DBA [AS-020 to AS-021]</u> <u>• ES Volume 3, Appendix 10.3 - Geophysical Survey [AS-022]</u> <u>• ES Volume 3, Appendix 10.4 - Aerial Investigation Mapping Survey [AS-032 to AS-024]</u> <u>• ES Volume 3, Appendix 10.5 - Evaluation Trenching Report [APP-172]</u> <u>• ES Volume 3, Appendix 10.6 - Archaeological Mitigation Strategy [APP-173]</u> <u>A detailed Archaeological Mitigation Strategy is to be drafted in accordance with the ES Volume 3, Appendix 10.6 - Archaeological Mitigation Strategy [APP-173], secured via a Requirement of the Draft DCO [AS-032].</u>

Relevant Paragraph	Detail	Scheme Compliance
Policy HE6	1. When considering the potential effect of a development proposal on the significance of a designated heritage asset, substantial weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential effect amounts to a positive effect, harm, substantial harm, or total loss of its significance. 2. Development proposals which would have a positive effect on a designated heritage asset should be supported. 3. Any harm to a designated heritage asset will be a matter of considerable importance and weight, which should be dealt with in accordance with paragraphs 4 to 6 of this policy. 4. Where a development proposal would harm the significance of a designated heritage asset the effect on the asset and its significance should be weighed against any public benefits resulting from the proposal. Important public benefits can include securing the long-term reuse of a vacant or underused listed building, and enabling energy efficiency and low carbon heating measures to be employed. 5. Where a development proposal would cause substantial harm to, or the total loss of, the significance of a designated heritage asset, consent should be refused unless it can be demonstrated that the harm is necessary to achieve substantial public benefits that outweigh the harm or loss . . .	Policy HE6 aligns with paragraph 5.9.28 of NPS EN-1, although it is noted that the NPPF (2026) has altered the terminology and attaches 'substantial' weight to an asset's conservation, whereas the previous version and NPS EN-1 attach 'great' weight. However, the relevant energy NPSs continue to refer to substantial and less than substantial harm. Accordingly, where ES Volume 1, Chapter 10 - Cultural Heritage [APP-046] and the Planning Statement [APP-209] refers to less than substantial harm, it should be understood as reflecting the terminology used within NPS EN-1 and NPS EN-3. The equivalent effect under the NPPF (2026) would be considered a low level of harm or harm at the lower end of the scale. ES Volume 1, Chapter 10 - Cultural Heritage [APP-046] 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 Volume 1, Chapter 10 - Cultural Heritage [APP-046] concludes that following the implementation of embedded and additional mitigation measures there will be no residual significant effects on any designated or non-designated assets as a result of the Scheme. Embedded mitigation measures, such as removal of solar PV from fields due to heritage sensitivities, have reduced any potential significant adverse effects. For two designated heritage assets, Moulton Farmhouse and Barn Cottages Grade II listed buildings, the assessment found minor adverse/negligible effects owing to the change in the settings. The level of harm caused by this impact is considered to be 'less than substantial harm' at the lower end of the scale. For Barn Cottages, this will be reduced to no harm once the landscaping screening has matured. No harm has been identified in relation to 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. ES Volume 1, Chapter 10 - Cultural Heritage [APP-046] outlines that 'substantial harm' is afforded to any adverse effect that is of a high magnitude of impact, whilst a low to medium magnitude of impact would represent 'less than substantial harm'. The Chapter concludes that following embedded mitigation, there will be no harm to the majority of designated heritage assets and no harm to all the non-designated heritage assets. Substantial harm to, or total loss of, any designated heritage assets' significance as a result of the Scheme is not anticipated. Therefore, the policy tests regarding substantial harm outlined in NPS EN-1 and the NPPF do not apply.

Relevant Paragraph	Detail	Scheme Compliance
		<u>Given the clear and urgent need to deploy renewable energy at speed and scale as set out in the Statement of Need [APP-206] and Planning Statement [APP-209], together with the wider public benefits, the Scheme demonstrably shows substantial public benefits that outweigh the less substantial harm identified.</u>
<u>Policy HE7</u>	<u>1. Development proposals which would have a positive effect on a non-designated heritage asset should be supported.</u> <u>2. Where a development proposal would harm the significance of a non-designated heritage asset, this should be weighed against the benefits of the proposal and a balanced judgement made, having regard to the scale of any harm or loss and the significance of the non-designated heritage asset</u> <u>3. Where a development proposal would cause substantial harm to, or the total loss of, the significance of a non-designated heritage asset, it should only be supported where the harm or loss is outweighed by the benefits of the proposal, having regard to the scale of the harm or loss and the significance of the non-designated heritage asset.</u>	<u>ES Volume 1, Chapter 10 - Cultural Heritage [APP-046] concludes that following embedded mitigation, there will be no harm to all the non-designated heritage assets identified.</u>
<u>Policy HE9</u>	<u>1. Development proposals within or affecting the significance of conservation areas should: .</u> <u>a. Consider the area's special architectural or historic interest (as identified as part of the designation of the conservation area) in the design of development.</u> <u>2. Not all elements of a conservation area will necessarily contribute to its significance. Where a development proposal would result in the loss of a building or other element which contributes to the character or appearance of a</u>	<u>The assessment of impacts on conservation areas has been undertaken in ES Volume 1, Chapter 10 – Cultural Heritage [APP-046] and ES Volume 3, Appendix 10.1 – Heritage Statement [APP-165 to APP-168].</u> <u>Each conservation area in proximity has been considered in the design of the Scheme, as set out within the Design Approach Document [APP-212] for example, in relation to the Brooke Conservation Area, Solar PV Panels were removed from the north-west of Site 9 to provide an offset.</u> <u>Within Site 5, a setback from the southern Order Limits of Sub-Site 5B removes and/or reduces visibility from the Fritton Conservation Area, as well as the Grade I listed Church of St Catherine, and two Grade II listed buildings.</u>

Relevant Paragraph	Detail	Scheme Compliance
	<u>conservation area that is desirable to conserve, the assessment of impact should take into account the relative significance of the element affected and its contribution to the significance of the conservation area as a whole, and the effects of this considered in accordance with policies HE5 and HE6.</u>	<u>A setback from the northern boundary of Sub-Site 7D was further introduced to remove/reduce visibility from Saxlingham Green Conservation Area and encompassed listed buildings.</u>
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 Volume 1, Chapter 10 – Cultural Heritage [EN0110014/APP/6.1.10] 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 Volume 1, Chapter 10 – Cultural Heritage [EN0110014/APP/6.1.10] concludes that following the implementation of embedded and additional mitigation measures there will be no residual significant effects on any designated or non-designated assets as a result of the Scheme. Embedded mitigation measures, such as removal of solar PV from fields due to heritage sensitivities, have reduced any potential significant adverse effects. ES Volume 1, Chapter 10 – Cultural Heritage [EN0110014/APP/6.1.10] outlines that 'substantial harm' is afforded to any adverse effect that is of a high magnitude of impact, whilst a medium magnitude of impact would represent 'less than substantial harm'. The Chapter concludes that following embedded mitigation, there will be no harm to the majority of designated heritage assets and no harm to all the non-designated heritage assets. Substantial harm to, or total loss of, any designated heritage assets' significance as a result of the Scheme is not anticipated. Therefore, the policy tests regarding substantial harm outlined in NPPF Paragraph 213 do not apply. For two designated heritage assets, Moulton Farmhouse and Barn Cottages Grade II listed buildings, the assessment found minor adverse/negligible effects owing to the change in the settings. The level of harm caused by this impact is considered to be 'less than substantial harm' at the lower end of the scale. For Barn Cottages, this will be reduced to no harm once the landscaping screening has matured. Given the clear and urgent need to deploy renewable energy at speed and scale as set out in the Statement of Need [EN0110014/APP/7.11] and Planning Statement [EN0110014/APP/7.14], together with the wider public benefits, the Scheme demonstrably shows substantial public benefits that outweigh the less substantial harm identified.

Relevant Paragraph	Detail	Scheme Compliance
Paragraph 242	When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.	ES Volume 1, Chapter 10— Cultural Heritage [EN0110014/APP/6.1.10] outlines that 'substantial harm' is afforded to any adverse effect that is of a high magnitude of impact, whilst a medium magnitude of impact would represent 'less than substantial harm'. Substantial harm to, or total loss of, any designated heritage assets' significance as a result of the Scheme is not anticipated. Therefore, the policy tests regarding substantial harm outlined in NPS-EN-1 do not apply.
Paragraph 243	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."	ES Volume 1, Chapter 10— Cultural Heritage [EN0110014/APP/6.1.10] concludes that following embedded mitigation, there will be no harm to the majority of designated heritage assets and no harm to all the non-designated heritage assets. For two designated heritage assets, Moulton Farmhouse and Barn Cottages Grade II listed buildings, the assessment found minor adverse/negligible effects owing to the change in the settings. The level of harm caused by this impact is considered to be 'less than substantial harm' at the lower end of the scale. For Barn Cottages, this will be reduced to no harm once the landscaping screening has matured. No harm has been identified in relation to 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. Given the clear and urgent need to deploy renewable energy at speed and scale as set out in the Statement of Need [EN0110014/APP/7.11] and Planning Statement [EN0110014/APP/7.14] , together with the wider public benefits, the Scheme demonstrably shows substantial public benefits that outweigh the less substantial harm identified. 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, 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.
Paragraph 244	Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply: a) the nature of the heritage asset prevents all reasonable uses of the site; and	

Relevant Paragraph	Detail	Scheme Compliance
	b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and e) conservation by grant funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and d) the harm or loss is outweighed by the benefit of bringing the site back into use."	
Paragraph 215	Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."	
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 Volume 1, Chapter 10—Cultural Heritage [EN0110014/APP/6.1.10] concludes that following embedded mitigation, there will be no harm to all the non-designated heritage assets.
Section 17: Facilitating the sustainable use of minerals		
Paragraph 227	Minerals planning authorities should plan for a steady and adequate supply of industrial minerals by: ...b) encouraging safeguarding or stockpiling so that important minerals remain available for use;	Minerals resources are considered in ES Volume 3, Appendix 16.2—Minerals Resource Assessment Desk Study [EN0110014/APP/6.3.16.2]. The presence of the Solar PV arrays and Cable Route Corridors will sterilise minerals within parts of the Order Limits, noting that the sterilisation is temporary in nature during the anticipated 60-year operational lifespan of the Scheme and following decommissioning any economically and commercially viable mineral will once again be accessible. However, these minerals are not presently considered to be economically viable or practical to extract due to a combination of the mineral resource being limited in

Relevant Paragraph	Detail	Scheme Compliance
		area or constrained by the presence of nearby designated ecological sites, roads, watercourses and residential properties. The Scheme is not considered to sterilise minerals deposits in the land surrounding the Order Limits. This is because the proposed Solar PV Arrays and Cable Route Corridors are considered to be of low sensitivity to activities associated with mineral extraction, e.g. traffic, noise and dust (unlike, a proposed residential development for example) and therefore the presence of the Scheme (once constructed) is unlikely to present a constraint to any new mineral extraction in areas adjacent to / near the Order Limits.

Table 5: Proposed reforms to the NPPF and other changes to the planning system, December 2025

Comment	Location
A revised version of the NPPF was published for consultation in December 2025, with the consultation due to close on 10 March 2026. As such, the draft NPPF attracts very limited weight, and it is not considered proportionate to demonstrate compliance with all relevant policies at this stage of the examination process. The opposing column identifies the locations within the Application where the December 2025 NPPF for Consultation has been addressed, where relevant.	Planning Statement [EN0110014/APP/7.14] ES Volume 1, Chapter 7—Landscape and Visual [EN0110014/APP/6.1.7] ES Volume 1, Chapter 11—Transport and Access [EN0110014/APP/6.1.11]

Table 56: The Greater Norwich Local Plan Document 1 - The Strategy

Policy / Paragraph Number	Detail	Scheme Compliance
Policy 1 The Sustainable Growth Strategy	Sustainable development and inclusive growth are supported by delivery of the following between 2018 and 2038: • To meet the requirement for around 40,550 new homes, provision is made for a minimum of 45,041 new homes. • To aid delivery of around 33,000 additional jobs and support key economic sectors, around 360 hectares of employment land is allocated, and employment opportunities are promoted at the local level. • Supporting infrastructure will be provided in line with policies 2 and 4. • Environmental protection and enhancement measures including further improvements to the green infrastructure network will be delivered. The sustainable growth strategy is illustrated in the Key Diagram.	The Statement of Need [EN0110014/APP/7.11] and Sections 2.1.6 and 6.5 of the Planning Statement [EN0110014/APP/7.14] explain that the Scheme produces urgently needed low carbon solar generation and, if consented, will contribute to the achievement of delivering sustainable development that enables decarbonisation. By doing so, the Scheme will provide energy that is secure, low carbon and low-cost. Furthermore, the Statement of Need [EN0110014/APP/7.11] sets out that the Scheme is required to ensure that the UK remains on track to meet its legally binding carbon emissions reduction targets, including the Sixth Carbon Budget and Nationally Determined Contribution. The Planning Statement [EN0110014/APP/7.14] under Section 14.4 Planning Balance sets out the full list of benefits that arise from the Scheme, beyond making a significant contribution to the UK's policy commitments and legal decarbonisation targets. ES Volume 1, Chapter 14 - Socio-Economics [EN0110014/APP/6.1.14] concludes that here is a significant beneficial effect anticipated on skills and the labour market during the construction and decommissioning phases, and on jobs, both direct employment and supply chain (workplace-based), during the decommissioning phase. The Scheme proposes to deliver biodiversity and green infrastructure enhancements within an area currently dominated by intensively managed arable land, with no loss of irreplaceable habitats. Embedded design buffers would retain key landscape features, supported by strengthening existing hedgerows, new tree, woodland and grassland planting, restoration of ghost ponds, and the provision of skylark mitigation plots. Collectively, these measures would enhance habitat connectivity and contribute positively to the local landscape, with long-term management secured through the Outline LEMP [EN0110014/APP/7.4].

Policy / Paragraph Number	Detail	Scheme Compliance
Policy 2 Sustainable Communities	To contribute to the achievement of sustainable communities, development proposals should, where relevant, address the following matters: 1. Ensure safe and convenient access for all, including by non-car modes, to on-site and local services and facilities such as schools, health care, shops, recreation/ leisure/community/faith facilities and libraries; encourage walking, cycling and public transport through the layout of development; and integrate parking to avoid it dominating the streetscape or being a hazard. 3. Create and contribute to multi-functional green infrastructure links, whether provided on-site or off-site, including through landscaping, street trees and other tree planting, taking account of local green infrastructure strategies and delivery plans. 4. Make efficient use of land with development densities taking account of accessibility and local character consideration. [...] 5. Create beautiful, well-designed places and buildings which respect the character of the local area and seek to enhance it through appropriate design, having regard to any local design guidance (including design codes). 6. Promote an inclusive, resilient, and safe community through the provision of facilities and services commensurate with the scale and type of the development; and the design and layout of development reflecting best practice to deter crime. 7. Avoid risks of unacceptable levels of soil, air, water and noise pollution and/or land instability. 8. Avoid locating inappropriate development in areas at risk of flooding by applying the sequential and exceptions tests and ensuring that flood risk is not increased elsewhere. Sustainable drainage systems should be incorporated unless there is clear evidence that this would be inappropriate.	ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11] aims to secure more sustainable patterns of transport through mitigation measures which are included within the Outline CEMP [EN0110014/APP/7.1], Outline CTMP [EN0110014/APP/7.6], Outline OEMP [EN0110014/APP/7.2], Outline OTMP [EN0110014/APP/7.7], Outline DEMP [EN0110014/APP/7.3], Outline PRoWPPMP [EN0110014/APP/7.8] and are secured via requirements of the draft DCO [EN0110014/APP/3.1]. The Outline PRoWPPMP [EN0110014/APP/7.8] 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 850 linear metres of permissive paths. The Green Infrastructure Strategy in the Outline LEMP [EN0110014/APP/7.4] demonstrates the Scheme would provide extensive new and enhanced green infrastructure. This includes for the retention and enhancement of green infrastructure assets, including restoration of ghost ponds, where practicable, together with new tree and hedgerow planting. The efficient use of land is addressed within the Planning Statement [EN0110014/APP/7.14] under the heading of Overplanting. The illustrative design for the Scheme shows a layout which is more land efficient than the NPS EN-3 4-5.6 acre range, at under 3 acres per MW (excluding land for environmental mitigation). However, while MW(p) is an important measure in relation to the maximum power which can be generated from a scheme, it is not the only metric by which the decarbonisation and energy security benefits brought forwards by solar schemes can or should be measured. The Overplanting section within Planning Statement addresses wider considerations, including the grid balancing services provided by the BESS. As set out in the Design Approach Document [EN0110014/APP/7.17] the Scheme is 'Landscape Led' and gives due weight to the intrinsic character and beauty of the surrounding area. Although the appearance of solar PV infrastructure is largely determined by its function, the design of the Scheme

Policy / Paragraph Number	Detail	Scheme Compliance
	10. Protect water quality and ensure a low level of energy consumption. To achieve this development proposals should: a. Take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption and the risk of overheating. b. Provide for the use of sustainable energy, local energy networks and battery storage where appropriate. Proposals for free standing decentralised, renewable and/or low carbon energy networks, except for wind energy schemes, will be supported subject to the acceptability of wider impacts.	has evolved and been informed by project level design principles that have resulted in good design. The applicant has considered the functionality, aesthetics, amenity and visual impacts of the Scheme during the iterative design process. ES Volume 1, Chapter 15 - Soils and Agricultural Land [EN0110014/APP/6.1.15] assesses the likely effects of the Scheme in relation to soils. Following embedded mitigation, no significant effects have been identified during construction, operation or decommissioning. The Scheme does not comprise an activity that results in air emissions once it is operational. Notwithstanding, ES Volume 1, Chapter 13 - Air Quality [EN0110014/APP/6.1.13] concludes that there are no anticipated significant effects on air quality during the construction and operation of the Scheme. ES Volume 3, Appendix 13.1 - Construction and Decommissioning Dust Risk Assessment [EN0110014/APP/6.1.13.1] has been produced to determine the level of mitigation required to control dust and particulate matters emission for inclusion in the Outline CEMP [EN0110014/APP/7.1] submitted as part of the DCO Application. ES Volume 1, Chapter 12 - Noise and Vibration [EN0110014/APP/6.1.12] assesses the likely effects of the Scheme in relation to noise for the construction, operation and decommissioning phases of the Scheme. This concludes that with the implementation of embedded mitigation and example additional mitigation, the residual effects arising from the Scheme will not be significant. The Outline CEMP [EN0110014/APP/7.1] sets out embedded mitigation measures to manage run-off and chemical spillages during the construction phase which include storing chemicals in accordance with their Control of Substances Hazardous to Health (COSHH) guidelines, whilst spill kits will be provided in areas of fuel/oil/minor chemicals storage. ES Volume 3, Appendices 9.1 - FRA and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1] and supporting assessments and hydraulic modelling confirm that the construction, operation and decommissioning of the Scheme, with mitigation and best practice control

Policy / Paragraph Number	Detail	Scheme Compliance
		measures, will remain safe for its lifetime and will not increase flood risk elsewhere, taking into account climate change. As outlined in ES Volume 3, Appendix 9.1 - FRA and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1], 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 Scheme comprises free standing solar photovoltaic electricity generation station and associated development. Policy 2 of The Greater Norwich Local Plan Document 1 is therefore supportive of the Scheme in principle.
Policy 3 Environmental Protection and Enhancement	The Built and Historic Environment The development strategy of the plan and the sites proposed for development reflect the area's settlement structure of the city, towns and villages, retaining the separate identities of individual settlements. Development proposals should enhance the built and historic environment through: • Being designed to create a distinct sense of place and enhance local character, taking account of local guidance such as conservation area appraisals and historic landscape character assessments. • Avoiding harm to designated and non-designated heritage assets, including their setting, having regard to their level of significance in accordance with the requirements of the NPPF and relevant policies in other Development Plan Documents and Neighbourhood Plans. • Providing a continued or new use for heritage assets whilst retaining their historic significance. • Undertaking a heritage impact assessment if significant impacts to a heritage asset might arise.	ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] 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. The chapter concludes that there are no significant (in EIA terms) residual effects identified during the construction, operation, and decommissioning of the Scheme. ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] has been informed by consideration of the Historic Environment Record (HER). ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] 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 3 [EN0110014/APP/6.3]: • Appendix 10.1 - Heritage Statement • Appendix 10.2 - Archaeological DBA • Appendix 10.3 - Geophysical Survey

Policy / Paragraph Number	Detail	Scheme Compliance
	- Where relevant, heritage interpretation measures should be provided to enhance the appreciation and understanding of local heritage assets. The Natural Environment Development proposals should enhance the natural environment: - designed to respect, conserve and enhance natural assets, taking account of local design and other guidance such as landscape character assessment; - Avoiding harm to designated and non-designated assets of the natural environment, having regard to their level of significance (local, national, and international) in accordance with the requirements of the NPPF and relevant policies in other Development Plan Documents and Neighbourhood Plans. - Following a hierarchy of seeking firstly to avoid impacts, mitigate for impacts so as to make them insignificant for biodiversity, or as a last resort compensate for losses that cannot be avoided or mitigated for. Adherence to the hierarchy should be demonstrated. - Undertaking a relevant assessment (such as a landscape or ecological assessment) if impacts to a natural asset might arise. - Provision of new, or conservation or enhancement of existing, green infrastructure to contribute (directly or indirectly) to the strategic green infrastructure network having regard to local green infrastructure strategies (identified indicatively in Maps 8A and 8B). - Respecting landscape character and retaining important views and features, having regard to landscape character assessments and sensitive areas such as landscape settings, strategic gaps and green spaces identified in Local or Neighbourhood Plans, and to the importance of the nationally designated Broads Authority area and its setting. In applying the above, regard will be given to the level of importance of the natural asset.	Appendix 10.4 - Aerial Photograph Survey Appendix 10.5 - Evaluation Trenching Report Appendix 10.6 - Archaeological Mitigation Strategy The chapter concludes that there are no significant residual effects identified during the construction, operation, and decommissioning of the Scheme. The Design Approach Document [EN0110014/APP/7.17] sets out project level design principles which have influenced the design evolution to avoid and minimise harm on landscape. Project Level Design Principle 2.1 sets out that the Scheme should respond to the character of the Sites, informed by Natural England Character Area Profiles and South Norfolk Local Landscape Character Assessment and Place Making Guide SPD, including the character of the River Valleys. There are no national landscape designations or local landscape designations within or immediately adjacent to the Order Limits. ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7] 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. As set out in the Design Approach Document [EN0110014/APP/7.17] the Scheme is 'Landscape Led' and gives due weight to the intrinsic character and beauty of the surrounding area. The design adheres to the mitigation hierarchy to reduce impacts and control any adverse effects on the environment throughout the lifecycle of the Scheme. The Scheme proposes to deliver biodiversity and green infrastructure enhancements within an area currently dominated by intensively managed arable land, with no loss of irreplaceable habitats. Embedded design buffers would retain key landscape features, supported

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	In addition, development will deliver net biodiversity gain through the provision of on-site or off-site natural features, creating new or enhancing existing green infrastructure networks that have regard to local green infrastructure strategies. It should be demonstrated that the gain to biodiversity is a significant enhancement (at least a 10% gain) compared to the existing situation. Any development that would be likely to have a significant effect on a European site, either alone or in combination with other plans or projects, will be subject to assessment under the Habitat Regulations at application stage. If it cannot be ascertained that there would be no adverse effects on site integrity the application will be refused unless it passes the tests set out in Regulation 62, and any necessary compensatory measures will need to be secured.	by strengthening existing hedgerows, new tree, woodland and grassland planting, restoration of ghost ponds, and the provision of skylark mitigation plots. Collectively, these measures would enhance habitat connectivity and contribute positively to the local landscape, with long-term management secured through the Outline LEMP [EN0110014/APP/7.4]. Landscape and ecological enhancements and mitigation measures for the Scheme are shown on Appendix 1: Green Infrastructure Strategy Plans to the Outline LEMP [EN0110014/APP/7.4]. As presented in the BNG Report [EN0110014/APP/7.23], the ecological mitigation and enhancement areas are predicted to provide a net gain of 37.42% for on-site habitats, and a net gain of 31.35% for on-site hedgerow and tree lines, and 16.08 for watercourses while a requirement of the draft DCO [EN0110014/APP/3.1] commits to delivering a minimum net gain of 10% for onsite habitats, 10% for onsite hedgerow and tree lines, and 10% for watercourses The landscape and ecological mitigation proposed for the Scheme will be secured through Requirements in Schedule 2 to the draft DCO [EN0110014/APP/3.1]. The environmental mitigation measures of the construction, operation and maintenance, and decommissioning phases of the Scheme are provided in the Commitment Register [EN0110014/APP/7.27]. This signposts where those mitigation measures are to be secured, for example through the inherently limited scope of the Works Plan or through the provisions of the various management plans. In preparing measures to support climate change adaptation, consideration has been given to incorporating nature-based solutions into the Scheme. Proposals for Sustainable Drainage Systems (SuDS) have been included as part of the Scheme design, as set out in ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9]. A Shadow Habitats Regulations Assessment – Screening Stage 1 [EN0110014/APP/7.25] has been prepared in accordance with the requirements of Conservation of Habitats and Species Regulations 2017 (the

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		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.
Policy 6 The Economy	290. The Norfolk and Suffolk Economic Strategy (NSES) recognises Norwich and Greater Norwich as one of six “priority places”. Greater Norwich is also a key location within two other priority places; the A47 corridor and the Cambridge-Norwich corridor. The NSES identifies nine key economic sectors of: • Energy. • Life sciences and biotech. • ICT, tech and digital creative. • Advanced agriculture, food and drink. • Visitor economy, tourism and culture. • Financial services and insurance. • Transport, freight and logistics. • Construction and development. • Advanced manufacturing and engineering. 291. The promotion of Norfolk and Suffolk as the “UK’s clean growth region” sits at the heart of New Anglia’s Local Industrial Strategy (LIS). It focusses on three high growth sectors: clean energy, agri-food and ICT/digital. All the NSES and LIS sectors are represented in Greater Norwich and relevant businesses are found throughout the area. In addition, there are important concentrations of the LIS priority sectors in strategic employment locations: Norwich Airport plays a key role in servicing the off-shore energy industry; Norwich Research Park and the Food Enterprise Park are crucial to the success of the agri-food sector and the city centre is home to a growing ICT/digital cluster. The high environmental standards promoted through this local plan will support the recognition of the area as the UK’s Clean Growth region. 294. The enhanced growth scenario forecasts around 45,000 jobs in the period 2015 to 2036. In the period 2015 to 2018 the East of England Forecasting Model (EEFM) suggests that around 15,000 jobs were	The Statement of Need [EN0110014/APP/7.11] and the Planning Statement [EN0110014/APP/7.14] explains that the Scheme, if consented, will be a substantial infrastructure asset, which will deliver large amounts of cheap, secure, and low carbon solar generation and will contribute to the achievement of meeting the Clean Power 2030 Mission objectives to deliver large amounts of cheap, secure, and low carbon electricity which will help the UK achieve its Sixth Carbon Budget commitments, meet the Clean Power 2030 Mission objectives, and stay on track to achieve net zero by 2050. The construction and operational sections of the Planning Statement [EN0110014/APP/8.1.14] highlights the increased number of jobs that would be available from the Scheme. Particularly from the construction phase. Ongoing partnerships for local supplies and manufacturing will be engaged with during the operational phase of the Scheme.

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	delivered. This leaves the enhanced growth potential for around 30,000 jobs in the period 2018 to 2036. This is an uplift of around 8,000 on the EEFM business as usual forecast and is consistent with City Deal ambitions. Since the evidence was produced the local plan period has been extended to 2038 and, based on the EEFM, the target is extended to 33,000 jobs 2018 to 2038.	

Table 67: South Norfolk Local Plan Development Management Policies Document, October 2015

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DM 1.1 Ensuring development management contributes to achieving sustainable development in South Norfolk	a) The Council will take a positive approach that reflects the presumption in favour of sustainable development, together with a responsibility to meet objectively assessed needs identified in the Local Plan and other unforeseen development needs and opportunities emerging that are generally consistent with the Council's Vision and Objectives for the area. b) The Council will work proactively where possible with applicants to find solutions so that development proposals can be approved wherever possible, and to secure development that jointly and simultaneously improves the economic, social and environmental conditions in the area. c) Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in adopted neighbourhood plans) will be approved without unnecessary delay, unless material considerations indicate otherwise. d) Where there are no directly relevant Policies to the application or the relevant policies are out of date at the time of making the decision, then the Council will consider the impact of the proposal in each of the economic, social and environmental dimensions jointly and simultaneously, for now and in the future. The Council will grant permission unless material considerations indicate otherwise – taking account of whether any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits when assessed against: i. The policies in the National Planning Policy Framework taken as a whole or ii. Other national planning policy guidance or - lii. The Council's overall Spatial Vision and Objectives for the area as set out in the Joint Core Strategy.	The Statement of Need [EN0110014/APP/7.11] and the Planning Statement [EN0110014/APP/7.14] explains that the Scheme produces urgently needed low carbon solar generation and, if consented, will contribute to the achievement of delivering sustainable development that enables decarbonisation. By doing so, the Scheme will provide energy that is secure, low carbon and low-cost. Furthermore, the Statement of Need [EN0110014/APP/7.11] sets out that the Scheme is required to ensure that the UK remains on track to meet its legally binding carbon emissions reduction targets, including the Sixth Carbon Budget and Nationally Determined Contribution. The ES [EN0110014/APP/6.1 – 6.4] covers the environmental, social and economic effects arising from the construction, operation and decommissioning of the Scheme. The Planning Statement [EN0110014/APP/7.14] under Section 14.4 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. The Scheme complies with the policies in the National Planning Policy Framework taken as a whole and with National Policy Statements EN-1, EN-3 and EN-5 as set out elsewhere in this Policy Compliance Document. Compliance with local development plan policies are also addressed within this document.

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	e) The Council will give significant weight to supplementary guidance and community led plans where these are relevant.	
DM 1.4 Environmental Quality and local distinctiveness	a) The Council will work with developers to promote and achieve high quality and positive environmental improvement from all development. All development proposals must demonstrate an understanding and evaluation of the important environmental assets including locally distinctive characteristics, and justify the design approach. b) Designated assets will be protected in accordance with their natural and historic significance, as detailed in the Development Management Policies. c) A net environmental improvement will always be sought and all proposals should avoid environmental harm or where this is not possible, adequately mitigate and compensate for the adverse environmental effects of development. d) All development should take all reasonable opportunities to: - Make a positive contribution to local character and distinctiveness; - Enhance biodiversity to achieve a net gain for nature; - To improve the resilience of ecosystems to environmental change including through the provision of improvements to enhance identified environmental sites; stepping stones and corridors; - Protect environmental and water resources and enhance their efficient use; - Deliver the provision of essential infrastructure including water and wastewater network upgrades, waste facilities, flood defences and green infrastructure; - Enhance, re-use and better reveal the significance of heritage assets; - Re-use buildings rather than demolish, recycle building materials and select materials to maximise environmental sustainability and minimise impact on scarce resources and environment; - Generate and utilise renewable energy in appropriate ways; and	ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] describes the existing levels and assesses the anticipated ecology and biodiversity effects of the Scheme's construction, operation and decommissioning phases. 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 Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] 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, operation and decommissioning phases. The expected residual beneficial effects outlined in ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] rely on controls established in the Outline CEMP [EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2], Outline DEMP [EN0110014/APP/7.3] and the Outline LEMP [EN0110014/APP/7.4] and are secured via corresponding requirements of the draft DCO [EN0110014/APP/3.1]. ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] sets out the mitigation measures embedded relevant to biodiversity into the Scheme. These measures are referred to within the Outline CEMP [EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2] and the Outline DEMP [EN0110014/APP/7.3] and secured via the draft DCO [EN0110014/APP/3.1]. Landscape and ecological enhancements and mitigation measures for the Scheme are shown in the Green Infrastructure Strategy within the Outline LEMP [EN0110014/APP/7.4]. As presented in the BNG Report [EN0110014/APP/7.23], the ecological mitigation and enhancement areas are predicted to provide a net gain of 37.42% for on-site habitats, and a net gain of 31.35% for on-site hedgerow and tree lines while a requirement of the draft DCO [EN0110014/APP/3.1] commits to delivering a minimum net gain of 10% for on-site habitats, and a net gain of 10% for on-site hedgerow and tree lines.

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	ix. Work with the characteristics of the location to ensure that the necessary mitigation measures are not disproportionate to the benefits of the scale of development proposed.	
DM 2.1 Employment and business development	1) Development proposals which provide for or assist the creation of new employment opportunities, inward investment and / or provide for the adaptation and expansion of an existing business will be supported unless there is a significant adverse impact in terms of Policies DM 1.1, 1.3 and other policies of the Local Plan. 6) Proposals for the expansion of existing businesses located in the Countryside should not have a significant adverse impact on the local and natural environment and character of the Countryside and should protect the amenities of neighbouring occupiers. 7) Proposals for new sites in the Countryside will be assessed against the policies of the Local Plan, with positive consideration given to proposals that: a) Re-use redundant rural buildings and hard standings (see Policy DM 2.10); and / or b) Are located on sites well related to rural towns and villages and it is demonstrated that there are no sequentially preferable sites available; and / or c) Create accessible jobs and business opportunities in the rural area.	The Outline Employment, Skills and Supply Chain Strategy (ESSCS) [EN0110014/APP/7.10], which is secured within the draft DCO [EN0110014/APP/3.1], sets out the proposals to generate and enhance skills, training and education opportunities. The Applicant is committed to promoting apprenticeships, supporting local labour where practicable, and collaborating with local further and higher education providers, established initiatives and local businesses. A Skills, Supply Chain, and Employment Plan would be secured in line with the Outline ESSCS to support training, apprenticeships and supply chain opportunities during construction and periods of on-site infrastructure replacement during operation. Where feasible, the Scheme would promote transferable skills to support workforce progression and stimulate local economic activity. As set out in the Outline ESSCS [EN0110014/APP/7.10] and ES Volume 1, Chapter 14 - Socio-Economics [EN0110014/APP/6.1.14], the Scheme is anticipated to create 233 Full Time Equivalent (FTE) with the estimated on-site construction workforce expected to peak at approximately 604 FTE jobs. An estimated 360 net direct jobs and 684 net indirect and induced jobs would be created during the construction phase, totalling 1,044 net additional jobs. During operation, an estimated maximum of 15 permanent jobs would be generated. In a peak replacement scenario, 240 FTE are required and in the decommissioning phase, in the absence of knowledge about the socio-economic context during that time, decommissioning effects of the Scheme are assumed to be the same as those assessed for the construction phase. The Outline ESSCS [EN0110014/APP/7.10] 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. ES Volume 1, Chapter 14 - Socio-Economics [EN0110014/APP/6.1.14] 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

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		decommissioning phases. There is a significant beneficial effect anticipated on skills and the labour market during the construction and decommissioning phases, and on jobs, employment and supply chain (workplace-based) during the decommissioning phase.
DM 3.8 Design Principles applying to all development	(1) The Council will work with applicants to achieve high quality design and positive improvement from all development, protect and enhance the environment and existing locally distinctive character and encourage innovation; the Council will refuse development that fails to take the opportunities for improving the character and quality of an area and the way the area functions. (2) Major development should be masterplanned using an inclusive recognised process demonstrating how the whole scheme will be delivered and related to adjacent areas, including the programming of infrastructure requirements. A masterplan will also be required for sites of less than 500 dwellings in the case of large developments incorporated into a smaller settlement or on sites of particular complexity. (4) Planning permission will be granted for development that has been designed to, where relevant to the proposed development: respect adjoining structures, spaces, routes and local landscape; provide an attractive, accessible and safe environment; and conform to the following criteria: (a) The scale, height, massing, form and appearance of development is designed with a satisfactory relationship of structures, spaces and routes within the site and a successful integration into the surroundings; (b) The development is created with high standards of design, building materials, finishes and landscaping reflecting the use of distinctive local building traditions, materials and heritage assets where relevant; or innovative contemporary design solutions reflecting local context and reinforcing or creating local distinctiveness;	Although the appearance of solar PV infrastructure is largely determined by its function, the design of the Scheme has evolved and been informed by project level design principles that have resulted in good design. As detailed in the Design Approach Document [EN0110014/APP/7.17] the applicant has considered the functionality, aesthetics, amenity and visual impacts of the Scheme during the iterative design process. Furthermore, as demonstrated in the Site Selection Assessment [EN0110014/APP/7.20] environmental and planning factors have been taken into account from the outset to avoid and reduce impacts. The Design Approach Document [EN0110014/APP/7.17] demonstrates how the application of the design vision and project level design principles has provided a framework for development of the design of the Scheme which has resulted in the Scheme being as attractive, durable and adaptable as it can be. IGP has adopted a series of corporate level design principles for their projects within the UK to make sure that the design of IGP projects deliver benefits to communities, enhance biodiversity, manage adverse effects on the local environment and help tackle climate change by harnessing and storing renewable energy. These design principles are discussed in the Design Approach Document [EN0110014/APP/7.17]. The applicant also developed a set of project level design principles, which will inform the design of the Scheme. These have and will inform decision-making, including at detailed design, to secure the best outcomes. Illustrations of how the project level design principles have been applied to the design of the scheme are given in the Design Approach Document [EN0110014/APP/7.17]. As set out in the Design Approach Document [EN0110014/APP/7.17] the Scheme is 'Landscape Led' and gives due weight to the intrinsic character and beauty of the surrounding area. The design also adheres to the mitigation hierarchy to reduce impacts and control any adverse effects on the environment throughout the lifecycle of the Scheme. It will also deliver a minimum 10% net gain for biodiversity through strategic habitat creation and enhancement measures. The landscape and ecological mitigation proposed for the Scheme is further detailed in the Outline LEMP [EN0110014/APP/7.4]

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	(c) Access is provided by routes and public spaces that meet different requirements of accessibility (including pedestrians, cyclists and people with mobility or sensory difficulties) without an unsatisfactory domination of traffic; (g) The entire development is designed to reduce any actual or perceived opportunities for anti-social activity on the site and in the surrounding area; (h) Landscaping of the development is designed to retain important existing natural features, reflect the surrounding landscape characteristics of the area and contribute to relevant objectives of the local Biodiversity Action Plan; and (i) Convenient, safe and visually attractive areas are created for servicing buildings and parking of vehicles and cycles without dominating the development or surroundings.	to be secured through a Requirement in Schedule 2 to the draft DCO [EN0110014/APP/3.1].
DM 3.10 Promotion of sustainable transport	(1) All development should support sustainable transport and development objectives, utilise all opportunities to integrate with local sustainable transport networks, be designed to reduce the need to travel and to maximise the use of sustainable forms of transport appropriate to the location.	ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11] aims to secure more sustainable patterns of transport through mitigation measures which are included within the Outline CEMP [EN0110014/APP/7.1], Outline CTMP [EN0110014/APP/7.6], Outline OEMP [EN0110014/APP/7.2], Outline OTMP [EN0110014/APP/7.7], Outline DEMP [EN0110014/APP/7.3], and Outline PRowPPMP [EN0110014/APP/7.8] and are secured via the requirements of the draft DCO [EN0110014/APP/3.1]. Mitigation measures to facilitate more sustainable modes of transport are included in the Outline CTMP [EN0110014/APP/7.6] which sets out a Framework Construction Worker Travel Plan (FCWTP). The following aims of the Travel Plan are set out to improve access by active, public and shared transport: • Reduce carbon emissions linked to private car travel by promoting sustainable transport modes such as staff minibuses and walking and cycling where it is practicable; • Encourage efficient travel by adopting shared transport modes, in turn reducing the impact and number of private vehicles;

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		- Ensure the CWTP and relevant measures are communicated to workforce members; - Reduce transport impacts from the Scheme on the local community; and - Improve the health and wellbeing of the workforce by promoting the health benefits of active travel. Suggested measures could include: - Appointing a designated Travel Plan Co-ordinator; - Provision of a shuttle bus to reduce single occupancy car journeys, - Encouraging walking and cycling to work where practicable; - Promotion of car sharing to reduce single occupancy car journeys. The Applicant has provided an Access and Rights of Way Plan [EN0110014/APP/2.7] and an Outline PRowPPMP [EN0110014/APP/7.8] which set out an overview of the accessible routes and access points available to pedestrians and cyclists.
DM 3.11 Road safety and the free flow of traffic	(1) On all sites development will not be permitted that endangers highway safety or the satisfactory functioning of the highway network. (2) Planning permission will be granted for development involving the formation or intensified use of a direct access onto a Corridor of Movement providing it would not: (a) Prejudice the safe and free flow of traffic or planned proposals for sustainable transport initiatives along the Corridor of Movement; (b) Be practical to gain access from the site to the Corridor of Movement via a secondary road; and (c) Facilitate the use of the Corridor of Movement for short local journeys.	The Scheme aims to utilise existing access points onto the Local Road Network to minimise the associated environmental impacts with appropriate widening and formalisation where necessary. However, where this is not feasible, a new vehicle access is proposed in ES Volume 3, Appendix 11.1 - Traffic Assessment [EN0110014/APP/6.3.11.1], which is compliant with all relevant highway safety requirements. The maintenance for these access points will be secured through the Outline OTMP [EN0110014/APP/7.7] throughout the lifetime of the Scheme. ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11] confirms early consideration of appropriate construction routes and access to the Scheme for construction traffic movements has been undertaken. This has included consideration of limiting movements through communities such as Hempnall, Brooke and Saxlingham Nethergate as far as practicable, together with considering the most suitable access routes and locations. Where possible the use of public roads has been minimised to move material and equipment around the site. This reduces potential congestion, increases highway safety and optimises site logistics. ES Volume 2, Figure 4.1 - Indicative Masterplan [EN0110014/APP/6.2.4.1] illustrates the proposed internal haul routes.

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		Consideration for the safety and accessibility of all road users has been informed by ES Volume 2, Figure 11.9 - Public Rights of Way, National Cycle Network and Bus Stops [EN0110014/APP/6.2.11.9], which highlights all relevant PRow and Cycle routes within and surrounding the Scheme. The Outline PRowPMP [EN0110014/APP/7.8] set out safety measures for users. Further mitigation measures for improving safety are outlined in the Outline CTMP [EN0110014/APP/7.6]. These include delivery management, temporary road signage, temporary traffic management, wheel washing arrangements, vehicle tracking and identification, preference for accreditation in procurement and Abnormal Indivisible Load management measures where relevant to ensure the safe and effective movement of HGVs and the provision of facilities for the drivers.
DM 3.12 Provision of vehicle parking	Planning permission will be granted where appropriate parking provision is provided by the developer to serve the needs of the proposed development. Development should provide sufficient parking to avoid highway safety problems and to protect living and working conditions locally. In decision making, consideration will be given to local parking / highway conditions. The appropriate parking provision for a development will be determined using the parking standards adopted by the Council as a 'starting point' which may be varied to reflect local conditions such as the availability of public parking, sustainable travel modes, Travel Plan provisions, and design and conservation objectives.	A Framework Construction Worker Travel Plan is provided in the Outline OCTMP [EN0110014/APP/7.6] and sets out the plan to reduce vehicle impacts associated with construction staff trips on the highway network. This plan encourages the use of sustainable modes of transport, where appropriate, and details measures such as staff shuttle services, provision of parking facilities, and any other proposed measures to reduce mode shift from private car use. A final Construction Worker Travel Plan (CWTP) will be secured via a Requirement of the DCO. Within the Outline CTMP [EN0110014/APP/7.6], the Outline OTMP [EN0110014/APP/7.7] and the Outline DEMP [EN0110014/APP/7.3], the Applicant has included mitigation measures such as signage to avoid on-street 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 within the Outline CTMP [EN0110014/APP/7.6].
DM 3.13 Amenity, noise and quality of life	(1) Development should ensure a reasonable standard of amenity reflecting the character of the local area. In all cases particular regard will be paid to avoiding: a. Overlooking and loss of private residential amenity space b. Loss of day light, overshadowing and overbearing impact c. Introduction of incompatible neighbouring uses in terms of noise, odour, vibration, air, dusts, insects, artificial light pollution and other such nuisances. Planning permission will be refused where proposed	As detailed in the Design Approach Document [EN0110014/APP/7.17] the applicant has considered the functionality, aesthetics, amenity and visual impacts of the Scheme during the iterative design process. Furthermore, as demonstrated in the Site Selection Assessment [EN0110014/APP/7.20] environmental and planning factors have been taken into account from the outset to avoid and reduce impacts.

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	development would lead to an excessive or unreasonable impact on existing neighbouring occupants and the amenity of the area or a poor level of amenity for new occupiers. (2) In considering applications which may result in an increase in noise exposure, account will be taken of the operational needs of the proposed and neighbouring businesses, the character and function of the area including background noise levels at different times of day and night and the need to protect areas of rural tranquillity. (3) Development will not be permitted where the proposed development would generate noise or artificial light which would be significantly detrimental to the amenity of nearby residents or the occupants of other noise sensitive uses. Proportionate mitigating measures including limiting conditions will be used to reduce the potential noise or artificial light impact to an appropriate level whenever practical to do so.	ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7] provides an assessment of the Scheme's impact on landscape and visual aspects within the Order limits, or that will be impacted by the Scheme. The chapter is accompanied by ES Volume 3, Appendix 7.8 - Residential Visual Amenity Assessment [EN0110014/APP/6.3.7.8], 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 Volume 2, Figure 7.9 - Residential Receptors Plan [EN0110014/APP/6.2.7.9]. ES Volume 3, Appendix 7.8 - Residential Visual Amenity Assessment [EN0110014/APP/6.3] concluded that of the two properties out of twenty within 100m that were found to meet the threshold for a detailed Residential Visual Amenity Assessment, upon detailed assessment, neither property were found to meet the Residential Visual Amenity Threshold. It was considered that the Scheme would overall not have overwhelming, dominating and/or overbearing effects on the visual amenity experienced by residents of the properties. Embedded mitigation within the Scheme is described in ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7]. In accordance with the mitigation hierarchy, the design has focused on avoiding environmental constraints as far as practicable. This has included developing buffers (offsets) to existing green infrastructure assets to retain and protect key landscape features, offsets from PRoW and from individual residential dwellings. In addition, as far as practicable, Solar PV Arrays have been set back and reduced in parts of the Sites, for example, where the landscape is more visually prominent owing to the topography and within a more sensitive landscape area, such as at Sub-Site 8B. ES Volume 1, Chapter 13 - Air Quality [EN0110014/APP/6.1.13] concludes that no significant effects (in EIA terms) are anticipated on air quality as a result of the Scheme, and therefore will not lead to a deterioration in air quality. ES Volume 1, Chapter 12 - Noise and Vibration [EN0110014/APP/6.1.12] presents an assessment of the potential impacts and likely significant effects of noise and vibration on human receptors during construction, operation and

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		maintenance, and decommissioning phases of the Scheme in accordance with the requirements of this policy, including a description of the noise generating aspects of the development. The chapter 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. 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 Outline CEMP [EN0110014/APP/7.1] and Outline DEMP [EN0110014/APP/7.3]. ES Volume 3, Appendix 7.11 - Lighting Strategy [EN0110014/APP/6.3.7.11] aims to ensure that external lighting for the Scheme is designed to provide a safe working environment while avoiding unnecessary light pollution and reducing potential effects on the key receptors. The objective is to minimise adverse effects as far as practicable, while meeting essential safety and security requirements of the Scheme. The Lighting Strategy highlights the mitigation techniques for ensuring that lighting has the least impact as possible.
DM 3.14 Pollution, health and safety	a) All development should minimise and where possible reduce the adverse impact of all forms of emissions and other forms of pollution, and ensure that there is no deterioration in water quality or water courses. b) When assessed individually or cumulatively, development proposals should ensure that there will be no unacceptable impacts on: i. Air quality ii. Surface and ground water quality iii. Land quality and condition iv. Health and safety of the public	The Scheme does not comprise an activity that results in air emissions once it is operational. Notwithstanding, ES Volume 1, Chapter 13 - Air Quality [EN0110014/APP/6.1.13] concludes that there are no anticipated significant effects on air quality during the construction and operation of the Scheme. Mitigation measures following 'Institute of Air Quality Management' (IAQM) guidance are detailed within the Outline CEMP [EN0110014/APP/7.1], the Outline CTMP [EN0110014/APP/7.6], the Outline BSMP [EN0110014/APP/7.5], the Outline OEMP [EN0110014/APP/7.2], and the Outline DEMP [EN0110014/APP/7.3]. These measures will be secured through Requirements in Schedule 2 to the draft DCO [EN0110014/APP/3.1]. There is potential for chemical spills and surface runoff into watercourses during the construction phase, which may subsequently degrade the habitats present within these sites, should they be hydrologically connected to the watercourses present within and adjacent to the Scheme. However,

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	c) Permission will only be granted on or near contaminated land if it is subject to remediation which will make it safe for the proposed use. On a contaminated site or one suspected to be contaminated or within 250 metres (or on more if considered appropriate on a risk based approach) of an existing or disused landfill site, applications will need to be accompanied with an assessment of the extent of contamination on the site and any possible risks. d) Developments which may impact on air quality will not be permitted where they have an unacceptable impact on human health, sensitive designated species or habitats, and general amenity, unless adequate mitigation can be ensured. Development will not be granted in locations where it is likely to result in an Air Quality Management Area being designated or the worsening of air quality in an existing Air Quality Management Area. e) Permission will not be granted for development on or in the vicinity of hazardous installations including high pressure gas and oil pipelines unless the development would not give rise to additional public risk	embedded mitigation measures are incorporated into the Outline CEMP [EN0110014/APP/7.1], secured through the draft DCO [EN0110014/APP/3.1], to manage run-off and chemical spillages during the construction phase which include storing chemicals in accordance with their Control of Substances Hazardous to Health (COSHH) guidelines, whilst spill kits will be provided in areas of fuel/oil/minor chemicals storage; an Emergency Spillage Plan will be produced, which site staff will have read and confirmed that they understand, via the site induction; and measures to limit the mobilisation of sediments and run-off, such as when working in very wet conditions or the use of silt fencing when working in ditches or watercourses. The assessment concludes, given the lack of impacts pathways between the Scheme and any non-designated nature sites following implementation of embedded mitigation measures, no significant effects (in EIA terms) are anticipated during the construction, operation and maintenance, and decommissioning of the Scheme. The Human Health Summary Statement within ES Volume 1, Chapter 18 - OEM [EN0110014/APP/6.1.18] presents a summary of the potential for likely significant effects on human health as result of the Scheme using ISEP guidance on health. The effects on human health during the construction, operation and maintenance and decommissioning phases are assessed within the ES. Relevant chapters of ES Volume 1 that have considered the effects of the Scheme on human health include: • ES Chapter 6 - Climate Change [EN0110014/APP/6.1.6]; • ES Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7]; • ES Chapter 9 - Water Environment [EN0110014/APP/6.1.9]; • ES Chapter 11 - Transport and Access [EN0110014/APP/6.1.11]; • ES Chapter 12 - Noise and Vibration [EN0110014/APP/6.1.12]; • ES Chapter 13 - Air Quality [EN0110014/APP/6.1.13]; • ES Chapter 14 - Socio-Economics [EN0110014/APP/6.1.14]; • ES Chapter 15 - Soils and Agriculture [EN0110014/APP/6.1.15] • ES Chapter 16 - Ground Conditions [EN0110014/APP/6.1.16]; and • ES Chapter 17 - EMF [EN0110014/APP/6.1.17].
DM 4.1 Renewable Energy	Proposals for renewable energy generating development requiring planning permission other than for proposals for wind energy	As recognised within the design policies set out in the NPPs, 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

Policy	Detail	Scheme Compliance
	development will be supported and considered (taking account of the impact of relevant ancillary equipment) in the context of sustainable development and climate change on the wider environmental, social and economic benefits of maximising use of renewable energy. The Council will encourage the use on-site communal-scale energy generation measures. (1) The effect of the proposal will be considered on: a) The effect on the character and appearance of the landscape; b) Designated and undesignated heritage assets; c) The amenities and living conditions of nearby residents by way of noise, outlook, and overbearing effect or unacceptable risk to health or amenity by way of other pollutants such as dust and odour. Permission will be granted where there are no significant adverse effects or where any adverse effects are outweighed by the benefits. When attributing weight to any harm, including heritage assets regard will be given to national policy and guidance, statutory duty and legislation, and other policies in the Local Plan including Policy DM4.10; (2) Where appropriate planning conditions will be imposed requiring the decommissioning and removal / dismantling of all plant and ancillary equipment, and if necessary the restoration of land, on the cessation of use.	able to enhance the quality of the local area may be limited. The Scheme has undergone a site selection process as detailed in the Site Selection Assessment [EN0110014/APP/7.20] and has adopted relevant design principles that enhance the environment within which it is located. As set out in the Design Approach Document [EN0110014/APP/7.17] the Scheme is 'Landscape Led' and gives due weight to the intrinsic character and beauty of the surrounding area. The design also adheres to the mitigation hierarchy to reduce impacts and control any adverse effects on the environment throughout the lifecycle of the Scheme. The landscape mitigation proposed for the Scheme is further detailed in the Outline LEMP [EN0110014/APP/7.4] to be secured through the draft DCO [EN0110014/APP/3.1]. Embedded design buffers would retain key landscape features, supported by strengthening existing hedgerows, new tree, woodland and grassland planting and restoration of ghost ponds. Collectively, these measures would contribute positively to the local landscape, with long-term management secured through the Outline LEMP [EN0110014/APP/7.4]. The extensive planting proposed throughout the Site, as part of the Appendix B: Green Infrastructure Strategy Plans to the Outline LEMP [EN0110014/APP/7.4] would provide long term beneficial effects upon the landscape fabric of the Site itself. ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] confirms there are no designated heritage assets within the Order Limits. ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] sets out the levels of sensitivity of the identified receptors within the Study Area. The Planning Statement [EN0110014/APP/7.14] confirms that it is not anticipated that the Scheme will lead to substantial harm to or loss of significance of any designated or non-designated heritage assets. ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] concludes that, with embedded and additional mitigation measures in place, there are no significant (in EIA terms) residual

Policy	Detail	Scheme Compliance
		adverse heritage related effects expected across the Scheme's construction, operational and decommissioning phases. The embedded and additional mitigation measures are documented within the: Outline CEMP [EN0110014/APP/7.1], Outline CTMP [EN0110014/APP/7.6], Outline OEMP [EN0110014/APP/7.2], Outline DEMP [EN0110014/APP/7.3], and Outline LEMP [EN0110014/APP/7.4] and are secured via requirements of the draft DCO [EN0110014/APP/3.1]. ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7] provides an assessment of the Scheme's impact on landscape and visual aspects within the Order limits, or that will be impacted by the Scheme. The chapter is accompanied by ES Volume 3, Appendix 7.8 - Residential Visual Amenity Assessment [EN0110014/APP/6.3.7.8], 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 Volume 2, Figure 7.9 - Residential Receptors Plan [EN0110014/APP/6.2.7.9]. ES Volume 3, Appendix 7.8 - Residential Visual Amenity Assessment [EN0110014/APP/6.3] concluded that of the two properties out of twenty within 100m that were found to meet the threshold for a detailed Residential Visual Amenity Assessment, upon detailed assessment, neither property were found to meet the Residential Visual Amenity Threshold. ES Volume 1, Chapter 13 - Air Quality [EN0110014/APP/6.1.13] concludes that no significant effects (in EIA terms) are anticipated on air quality as a result of the Scheme, and therefore will not lead to a deterioration in air quality. ES Volume 1, Chapter 12 - Noise and Vibration [EN0110014/APP/6.1.12] 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. 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 Outline CEMP [EN0110014/APP/7.1] and Outline DEMP [EN0110014/APP/7.3].

Policy	Detail	Scheme Compliance
		ES Volume 3, Appendix 7.11 - Lighting Strategy [EN0110014/APP/6.3.7.11] aims to ensure that external lighting for the Scheme is designed to provide a safe working environment while avoiding unnecessary light pollution and reducing potential effects on the key receptors. The Lighting Strategy highlights the mitigation techniques for ensuring that lighting has the least impact as possible.
DM 4.2 Sustainable drainage and water management	(1) Sustainable drainage measures must be fully integrated within design to manage any surface water arising from development proposals, and to minimise the risk of flooding on the development site and in the surrounding area, unless it can be demonstrated that ground conditions are unsuitable for such measures or there are other exceptional circumstances. (2) Details showing how proposed drainage measures will fully integrate with the design of development and how the drainage system will contribute to the amenity and biodiversity of the development must be made clear within applications for full planning permission. Drainage features should make a positive contribution to amenity and biodiversity. (3) All developments (including that on previously developed land): a) Should include a sewerage capacity assessment and must have a neutral or positive impact on reducing surface water flooding and should include drainage features that will slow the movement of water through the drainage system; b) Must not cause any deterioration in water quality and measures to treat surface water runoff must be included within the design of the drainage system; c) Must be served by separate surface water and foul wastewater drainage. No new development (including redevelopment) will be permitted to discharge surface water runoff to foul drainage connections or combined sewers, unless it can be demonstrated that separate surface water drainage is not available and cannot be practicably provided; and d) Should maximise use of soft landscaping and permeable surfaces unless the developer can provide justification to demonstrate that this is not feasible.	In preparing measures to support climate change adaptation, consideration has been given to incorporating nature-based solutions into the Scheme. Proposals for Sustainable Drainage Systems (SuDS) have been included as part of the Scheme design, as set out in ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9]. The DCO Application is supported by ES Volume 3, Appendix 9.1 - FRA and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1], which considers the impacts of the Scheme on drainage. As outlined in ES Volume 3, Appendix 9.1 - FRA and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1], 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. ES Volume 3, Appendix 9.1 - FRA and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1] includes an Outline 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 [EN0110014/APP/3.1].

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	Applications which do not demonstrate how sustainable drainage has been taken into account in the design may be refused.	
DM 4.4 Natural environmental assets – designated and locally important open spaces	a) The highest status natural environmental assets are identified on the Policies Map and in supporting evidence, and will be protected from any significant harmful impact arising from new development. New development impacting on these designated sites will be required to contribute positive improvement of these natural environmental assets where opportunities arise. International, National and County-wide level sites will be accorded the highest levels of priority. b) At the Important Local Open Spaces identified in paragraphs 4.32–4.44 and on Maps 4.4 (1) – (6) and on the Proposal Map, development will only be permitted where it retains the open character and appearance of the site, where it respects the contribution which the identified open site or open frontage makes to the form and character of the Settlement and where there is no significant adverse impact on the setting of any existing building. New development impacting on these designated sites will be required to contribute positive improvement of these natural environmental assets where opportunities arise. c) Developers will need to work with partners to evolve strategies to enable individual new development sites to contribute most effectively to the opportunities for the establishment and positive improvement of coherent ecological networks, Biodiversity Enhancement Areas and multi-functional Green Infrastructure Networks.	The Scheme would include the provision of new community accessible spaces for pedestrian use in Sub-Sites 4B, 7D and 7F. These spaces would deliver approximately new accessible space and are located within the Order Limits to provide opportunities for informal recreation and amenity use. The community accessible space in Sub-Site 4B offers potential for archaeological interpretation and educational engagement, including interpretation signage, while the areas within Sub-Sites 7D and 7F provide opportunities for amenity use such as walking. The objectives and targets of the community accessible space, together with a framework for the management during the operation of the Scheme is set out in the Outline LEMP [EN0110014/APP/7.4]. The Scheme proposes to deliver biodiversity and green infrastructure enhancements within an area currently dominated by intensively managed arable land, with no loss of irreplaceable habitats. Embedded design buffers would retain key landscape features, supported by strengthening existing hedgerows, new tree, woodland and grassland planting, restoration of ghost ponds, and the provision of skylark mitigation plots. Collectively, these measures would enhance habitat connectivity with long-term management secured through the Outline LEMP [EN0110014/APP/7.4].
DM 4.5 Landscape Character Areas and River Valleys	All development should respect, conserve and where possible, enhance the landscape character of its immediate and wider environment. Development proposals that would cause significant adverse impact on the distinctive landscape characteristics of an area will be refused. All development proposals will be expected to demonstrate how they have taken the following elements (from the 2001 South Norfolk Landscape Assessment as updated by the 2012 review) into account:	The Design Approach Document [EN0110014/APP/7.17] sets out project level design principles which have influenced the design evolution to avoid and minimise harm on landscape. Project Level Design Principle 2.1 sets out that the Scheme should respond to the character of the Sites, informed by Natural England Character Area Profiles and South Norfolk Local Landscape Character Assessment and Place Making Guide SPD, including the character of the River Valleys. Opportunities to conserve and enhance the character of the landscape include but are not limited to:

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	• The key characteristics, assets, sensitivities and vulnerabilities; • The landscape strategy; and • Development considerations. Particular regard will be had to protecting the distinctive characteristics, special qualities and geographical extents of the identified Rural River Valleys and Valley Urban Fringe landscape character types.	• Avoiding placing infrastructure within the River Valley landscapes as far as possible, recognising their higher sensitivity and more varied topography. • Supporting the creation and restoration of field-edge habitats through new grassland, enhanced and newly planted hedgerows, linear tree planting, scrub and woodland creation, and the reinstatement of former pond features. These measures help deliver stronger ecological networks across the farmed landscape. The Scheme has also been arranged to minimise visibility from nearby recreational routes, supporting the conservation of local tranquillity. • Enhancing opportunities for access and understanding of the landscape through the provision of new permissive routes and community-facing environmental improvements. The siting of infrastructure has been carefully considered to limit effects on nearby settlements and to respect traditional settlement patterns. • Maintaining and enhancing the River Tas Valley by introducing new areas of woodland and grassland within the lower-lying parts of the valley, contributing to landscape character and habitat diversity. • Protecting and reinforcing ancient semi-natural woodland, hedgerows and hedgerow trees through targeted management and the introduction of new woodland and hedgerow planting. These measures strengthen biodiversity, improve habitat connectivity and support visual screening. • Extending and linking existing woodland and linear features forms a key part of the landscape strategy, providing both green infrastructure benefits and appropriate separation between the development and its surroundings. ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7] provides an assessment of the Scheme's impact on landscape and visual within the Order Limits, or that will be impacted by the Scheme. It also includes references to local and national landscape character assessments and associated studies as a means of assessing landscape impacts. The Design Principles, Parameters and Commitments [EN0110014/APP/7.18] sets out the parameters and commitments for the Scheme that the detailed design must accord with as per Requirement 5 of the draft DCO [EN0110014/APP/3.1]. The project level design principles that

Policy	Detail	Scheme Compliance
		have informed the Scheme design are set out within the Design Approach Document [EN0110014/APP/7.17]. As set out in Planning Statement [EN0110014/APP/7.14], 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.
DM 4.8 Protection of Trees and Hedgerows	The Council will promote the retention and conservation of significant trees, woodlands and traditional orchards and will serve Tree Preservation Orders where necessary. The Council will presume in favour of the retention of 'important' hedgerows as defined by the Hedgerows Regulations 1997. The Council will safeguard and promote the appropriate management of protected and other significant trees and hedgerows, unless the need for, and benefits of, a development clearly outweigh their loss.	The ES is supported by extensive arboricultural survey works which identify significant trees and woodlands and is included in ES Volume 3, Appendix 7.10 - Preliminary Arboriculture Impact Assessment [EN0110014/APP/6.3.7.10]. This provides an assessment of the likely significant effects on trees, including any ancient woodland impacted by the Scheme. 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. Buffers are set out in the Design Approach Document [EN0110014/APP/7.17] which includes 10m for hedgerows, 15m for individual trees, groups of trees and non-Ancient Woodland, 30m for Ancient Woodland and 15x width of tree stem diameter or 5m from the edge of the tree's canopy, whichever is greater for Veteran and Ancient trees. 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 outweigh the adverse residual effects of the Scheme. Therefore, the Scheme is considered acceptable in terms of its overall impacts on trees and woodlands and the nature of those impacts is not considered to outweigh the substantial benefits of the Scheme. A more detailed consideration of the planning balance is contained within the Planning Statement [EN0110014/APP/7.14].
DM 4.9 Incorporating	Where appropriate, detailed development proposals must demonstrate a high quality of landscape design, implementation and management as an integral part of the new development.	As set out in the Design Approach Document [EN0110014/APP/7.17] the Scheme is 'Landscape Led' and gives due weight to the intrinsic character and beauty of the surrounding area.

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landscape into design	The provision for new planted features (such as tree belts, hedgerows, wild flowers and specimen trees) is expected to form part of development proposals from their outset and should provide an appropriate landscape setting for the scheme. 'Hard' landscape features (such as paving, kerb stones, street furniture, boundary treatments etc) will reflect and where possible enhance locally distinctive character and styles where relevant; or innovative contemporary solutions reflecting local context and reinforcing or creating local distinctiveness and the setting of the development. Landscape schemes will be required to respect the character and distinctiveness of the local landscape and should ensure that any land remodelling respects the local topographic character in terms of height, slope, angle and character. Landscape schemes should be clearly and properly specified.	The following elements comprise key design, landscape and visual mitigation measures embedded into the design of the Scheme, and secured via the Outline LEMP [EN0110014/APP/7.4]: • Creation and enhancement of habitats within the Order limits, including protection and enhancement of existing landscape and ecological features. • Strengthening of Green Infrastructure and ecological connectivity across the Order limits, in accordance with local conservation priorities. • Provision of visual screening through landscape planting to mitigate effects on Public Rights of Way (PRoW), roads and residential receptors. • Active long-term management and maintenance of existing and newly planted vegetation as an embedded mitigation measure. • Management of hedgerows to a maintenance height of approximately 3 metres to provide effective visual screening, particularly for PRoW and nearby visual receptors. • Ongoing management of trees and woodland to ensure successful establishment and to deliver long-term visual filtering, screening and habitat provision as part of the wider ecological network.
DM 4.10 Heritage Assets	All development proposals must have regard to the historic environment and take account of the contribution which heritage assets make to the significance of an area and its sense of place, as defined by reference to the national and local evidence base relating to heritage. Change of use, alterations and extensions affecting the significance of a designated heritage asset, including its setting, must have regard to and positively respond to, that significance. Proposals must sustain, and where possible enhance and better reveal the significance of the asset and make a positive contribution to local distinctiveness. Proposals must show how the significance of the heritage asset has been assessed and taken into account by reference to the Historic	ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] 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. The chapter concludes that there are no significant (in EIA terms) residual effects identified during the construction, operation, and decommissioning of the Scheme. ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] has been informed by the Historic Environment Record (HER). Section 10.6 of ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] sets out the existing cultural heritage baseline

Policy	Detail	Scheme Compliance
	Environment Record, suitable expertise and other evidence/research as may be necessary. Considerable importance and weight must be given to the desirability of preserving listed buildings, their settings and the character and appearance of conservation areas. Development should avoid causing any loss to a heritage asset, or harm to it. Substantial harm or total loss will only be justified where it can be demonstrated that it is necessary to achieve substantial benefits or where the retention of the asset is unsustainable, no viable alternatives can be identified and the harm or loss is outweighed by the benefits of bringing the site back into use. Less than substantial harm will only be justified where there are public benefits that outweigh the harm. In carrying out this planning balance, less than substantial harm will be afforded considerable importance and weight. Proposals which adversely affect the significance of a heritage asset will only exceptionally be permitted where clear and convincing justification is provided.	conditions. The full details of the baseline conditions are presented in the following appendices presented in ES Volume 3 [EN0110014/APP/6.3]: • Appendix 10.1 - Heritage Statement • Appendix 10.2 - Archaeological DBA • Appendix 10.3 - Geophysical Survey • Appendix 10.4 - Aerial Photograph Survey • Appendix 10.5 - Evaluation Trenching Report • Appendix 10.6 - Archaeological Mitigation Strategy Any impacts to the setting of designated heritage assets would be temporary and reversed following the decommissioning of the Scheme. ES Volume 3, Appendix 10.1 - Heritage Statement [EN0110014/APP/6.3] concludes that there will be no substantial harm to or loss of significance of any grade II Listed Buildings or grade II Registered Park and Gardens as a result of the Scheme. In addition, the Scheme will not lead to substantial harm to or loss of significant to any assets of the highest significance including Scheduled Monuments, Protected Wreck Sites, Registered Battlefields, grade I and II* Listed Buildings, grade I and II* Registered parks and Gardens, and World Heritage Sites. ES Volume 3, Appendix 10.1 - Heritage Statement [EN0110014/APP/6.3] concludes that the Scheme will not lead to substantial harm to any designated heritage assets. The substantial benefits of the Scheme are set out in the Planning Statement [EN0110014/APP/7.14] and include the contribution the Scheme makes to decarbonisation, the demand for electricity and security of supply, renewable energy generation, ecological and landscape enhancements, biodiversity net gain, the provision of three new permissive paths, employment generation, economic benefits and skills training. It is considered that these benefits outweigh the less than substantial harm to the heritage assets.

Table 78: Norfolk Minerals and Waste Local Plan 2023-2038 (2025)

Policy	Detail	Scheme Compliance
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 County Council will object to development proposals which would prevent or prejudice the use of safeguarded sites for mineral extraction.	There are no allocated or safeguarded existing or proposed mineral sites nor consultations for these within 250m of the Order Limits in the current Norfolk Minerals and Waste Local Plan. A preliminary qualitative minerals assessment is presented in ES Volume 3, Appendix 16.2 - Minerals Resource Assessment Desk Study [EN0110014/APP/6.3.16.2] which identifies mineral resources that are crossed by the Order Limits. Small parts of the Order Limits are underlain by superficial strata of Alluvium, Leet Hill Sand and Gravel Member, Lowestoft Formation - Sand and Gravel and River Terrace Deposits, which are classified as sand and gravel mineral resources. The potential effects on minerals resources are discussed in ES Volume 1 Chapter 16 - Ground Conditions [EN0110014/APP/6.1.16]. This notes the presence of the Solar PV modules and CRC will sterilise minerals within parts of the Order Limits, however the sterilisation will be temporary in nature. Furthermore, the minerals within the Order Limits are not considered to be economically viable or practical to extract due to a combination of the mineral resource being limited or constrained by the presence of nearby roads, watercourses and residential properties. ES Volume 3, Appendix 16.2 - Minerals Resource Assessment Desk Study [EN0110014/APP/6.3.16.2] provides detail on the assessment and re-use of incidentally excavated mineral arisings from the cable trenching within the CRCs underlain by safeguarded mineral deposits.

Table 89: Norfolk County Council Local Transport Plan 4 Strategy 2021-2036 (2022)

Policy	Detail	Scheme Compliance
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 Volume 1, Chapter 14 - Socio-Economics [EN0110014/ APP/6.1.14] describes the existing levels and assesses the anticipated economic and social effects of the Scheme's construction, operation and decommissioning. ES Volume 1, Chapter 14 - Socio-Economics [EN0110014/ APP/6.1.14] 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, operation 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, operation and decommissioning phases. The residual effects outlined in the ES Volume 1, Chapter 14: Socio-Economics [EN0110014/ APP/6.1.14] rely on controls established within the Outline CEMP [EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2] and Outline DEMP [EN0110014/APP/7.3] and are secured in the draft DCO [EN0110014/APP/3.1]. ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] 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 Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] 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, operation and decommissioning phases.

Policy	Detail	Scheme Compliance
		The expected residual beneficial effects outlined in ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] rely on controls established in the Outline CEMP [EN0110014/APP/7.1] , Outline OEMP [EN0110014/APP/7.2] , Outline DEMP [EN0110014/APP/7.3] and the Outline LEMP [EN0110014/APP/7.4] and are secured via corresponding requirements of the draft DCO [EN0110014/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 Outline CTMP [EN0110014/APP/7.6] which sets out a Framework Construction Worker Travel Plan. The following aims of the Travel Plan are set out to improve access by active, public and shared transport: • Reduce carbon emissions linked to private car travel by promoting sustainable transport modes such as staff minibuses and walking and cycling where it is practicable; • Encourage efficient travel by adopting shared transport modes, in turn reducing the impact and number of private vehicles; • Ensure the CWTP and relevant measures are communicated to workforce members; • Reduce transport impacts from the Scheme on the local community; and • Improve the health and wellbeing of the workforce by promoting the health benefits of active travel. Suggested measures could include: • Appointing a designated Travel Plan Co-ordinator; • Provision of a shuttle bus to reduce single occupancy car journeys, • Encouraging walking and cycling to work where practicable; • Promotion of car sharing to reduce single occupancy car journeys. 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 also seek to reduce the need for parking on Site and contribute to the decarbonisation of the transport network by offering a wider modal choice.

Policy	Detail	Scheme Compliance
		ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/7.11] describes the existing levels and provides an assessment of the anticipated transport and access effects of the Scheme's construction, operation and decommissioning phases in accordance with this policy. ES Volume 1, Chapter 11 - Transport and Access [EN0110014/ APP/6.1.11] aims to secure more sustainable patterns of transport through mitigation measures which are included within the Outline CEMP [EN0110014/APP/7.1], Outline CTMP [EN0110014/ APP/7.6], Outline OEMP [EN0110014/APP/7.2], Outline OTMP [EN0110014/APP/7.7], Outline DEMP [EN0110014/APP/7.3], and Outline PRoWPPMP [EN0110014/APP/7.8] and are secured via the requirements of the draft DCO [EN0110014/APP/3.1]. ES Chapter 6 - Climate Change [EN0110014/APP/6.1.6] 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 Outline CEMP [EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2], and Outline DEMP [EN0110014/APP/7.10] and secured via a requirement of the draft DCO [EN0110014/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 [EN0110014/APP/7.14] outlines how the Scheme achieves the three objectives of sustainable development outlined in the NPPF. The Planning Statement [EN0110014/APP/7.14] and the Statement of Need [EN0110014/APP/7.11] 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 reduces 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.	To reduce the volume of construction staff and employee trips to the Scheme the Outline CTMP [EN0110014/APP/7.6] states a Construction Worker Travel Plan will be implemented. Construction workers will be encouraged to use minibus services, public transport, cycling, walking and car-sharing to travel to and from the Scheme. The Outline OTMP [EN0110014/APP/7.7] provides a framework for the management of vehicle movements to and from the Scheme during periods of

Policy	Detail	Scheme Compliance
		scheduled replacement, repair activities and maintenance activities to be carried out during the operational phase to minimise the number of vehicles involved and set out measures to minimise the effects of operation traffic associated with replacement activities on the local community and other road users. ES Volume 1, Chapter 11 - Transport and Access [EN0110014/ APP/6.1.11] aims to secure more sustainable patterns of transport through mitigation measures which are included within the Outline CEMP [EN0110014/APP/7.1], Outline CTMP [EN0110014/ APP/7.6], Outline OEMP [EN0110014/APP/7.2], Outline OTMP [EN0110014/APP/7.7], Outline DEMP [EN0110014/APP/7.3], and Outline PRoWPPMP [EN0110014/APP/7.8] and are secured via the requirements of the draft DCO [EN0110014/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 with appropriate widening and formalisation where necessary. However, where this is not feasible, a new vehicle access is proposed in ES Volume 3, Appendix 11.1 - Traffic Assessment [EN0110014/APP/6.3.11.1], which is compliant with all relevant highway safety requirements. The maintenance for these access points will be secured through the Outline OTMP [EN0110014/APP/7.7] throughout the lifetime of the Scheme. To reduce the volume of construction staff and employee trips to the Scheme during construction the Outline CTMP [EN0110014/APP/7.6] states a Construction Workers Travel Plan will be implemented. Workers will be encouraged to use minibus services, public transport, cycling, walking and car-sharing to travel to the Scheme. Shifts will be arranged so that workers are not travelling during peak travel times. The Outline OTMP [EN0110014/APP/7.7] provides a framework for the management of vehicle movements to and from the Scheme during periods of scheduled replacement, repair activities and maintenance activities to be carried out during the operational phase to minimise the number of vehicles involved and set out measures to minimise the effects of operation traffic associated with replacement activities on the local community and other road users.
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 any carbon impacts are monitored and offset by locally	To reduce the volume of construction staff and employee trips to the Scheme the Outline CTMP [EN0110014/APP/7.6] states a Travel Plan will be implemented. Construction workers will be encouraged to use minibus services, public transport, cycling, walking and car-sharing to travel to and from the Scheme to reduce carbon emissions linked to private car travel.

Policy	Detail	Scheme Compliance
	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.	The Outline OTMP [EN0110014/APP/7.7] provides a framework for the management of vehicle movements to and from the Scheme during periods of scheduled replacement, repair activities and maintenance activities to be carried out during the operational phase to minimise the number of vehicles involved and set out measures to minimise the effects of operation traffic associated with replacement activities on the local community and other road users.
Policy 7	In air quality management areas development will need to demonstrate its positive contribution to tackling the air quality problem.	ES Chapter 13 - Air Quality [EN0110014/APP/6.1.13] confirms that the Site is not located within a Local Authority with designated Air Quality Management Areas (AQMA) or within an AQMA boundary.
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.	To reduce the volume of construction staff and employee trips to the Scheme the Outline CTMP [EN0110014/APP/7.6] states a Travel Plan will be implemented. Construction workers will be encouraged to use minibus services, public transport, cycling, walking and car-sharing to travel to and from the Scheme to reduce carbon emissions linked to private car travel. The Outline OTMP [EN0110014/APP/7.7] provides a framework for the management of vehicle movements to and from the Scheme during periods of scheduled replacement, repair activities and maintenance activities to be carried out during the operational phase to minimise the number of vehicles involved and set out measures to minimise the effects of operation traffic associated with replacement activities on the local community and other road users.
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 Volume 1, Chapter 13 - Air Quality [EN0110014/APP/6.1.13] confirms that the Site is not located within a Local Authority with designated Air Quality Management Areas (AQMA) or within an AQMA boundary. ES Volume 1, Chapter 13 - Air Quality [EN0110014/APP/6.1.13] provides an assessment of the construction and decommissioning phases of the Scheme on air quality in terms of both human health and ecological receptors. The assessment found that the air quality effects would not likely be significant during the construction and decommissioning phases. Nevertheless, the Outline CEMP [EN0110014/APP/7.1], Outline CTMP [EN0110014/APP/7.6] and Outline OEMP [EN0110014/APP/7.2] set out measures to reduce plant and vehicle emissions to air. The dust risk assessment in ES Volume 3, Appendix 13.1 - Construction and Decommissioning Dust Risk Assessment [EN0110014/APP/6.3.13.1] determines the mitigation required for the construction and decommissioning

Policy	Detail	Scheme Compliance
		phases of the Scheme, which is set out in the Outline CEMP [EN0110014/APP/7.1] and the Outline DEMP [EN0110014/APP/7.3]. A Plume Study is included in the Outline BSMP [EN0110014/APP/7.5], which considers combustion emissions in the event of a battery fire.
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 [EN0110014/APP/2.7] and an Outline PRoWPPMP [EN0110014/APP/7.8] which set out an overview of the accessible routes and access points available to pedestrians and cyclists. The Applicant has provided an Equality Impact Assessment [EN0110014/APP/7.19] 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.	Mitigation measures to facilitate more sustainable modes of transport are included in Section 8 of the Outline CTMP [EN0110014/APP/7.6] which sets out a Framework Construction Worker Travel Plan. The following aims of the Travel Plan are set out to improve access by active, public and shared transport: • Reduce carbon emissions linked to private car travel by promoting sustainable transport modes such as staff minibuses and walking and cycling where it is practicable; • Encourage efficient travel by adopting shared transport modes, in turn reducing the impact and number of private vehicles; • Ensure the CWTP and relevant measures are communicated to workforce members; • Reduce transport impacts from the Scheme on the local community; and • Improve the health and wellbeing of the workforce by promoting the health benefits of active travel. Suggested measures could include: • Appointing a designated Travel Plan Co-ordinator; • Provision of a shuttle bus to reduce single occupancy car journeys, • Encouraging walking and cycling to work where practicable;

Policy	Detail	Scheme Compliance
		Promotion of car sharing to reduce single occupancy car journeys. ES Volume 1, Chapter 11 - Transport and Access [EN0110014/ APP/6.1.11] aims to secure more sustainable patterns of transport through mitigation measures which are included within the Outline CEMP [EN0110014/APP/7.1], Outline CTMP [EN0110014/ APP/7.6], Outline OEMP [EN0110014/APP/7.2], Outline OTMP [EN0110014/APP/7.7], Outline DEMP [EN0110014/APP/7.3], and Outline PRoWPPMP [EN0110014/APP/7.8] and are secured via the requirements of the draft DCO [EN0110014/APP/3.1]. The Applicant has provided an Access and Rights of Way Plan [EN0110014/APP/2.7] and an Outline PRoWPPMP [EN0110014/APP/7.8] 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.	ES Volume 1, Chapter 11 - Transport and Access [EN0110014/ APP/6.1.11] confirms early consideration of appropriate construction routes and access to the Scheme for construction traffic movements has been undertaken. This has included consideration of limiting movements through communities such as Hempnall, Brooke and Saxlingham Nethergate as far as practicable, together with considering the most suitable access routes and locations. Where possible the use of public roads has been minimised to move material and equipment around the site. This reduces potential congestion, increases highway safety and optimises site logistics. ES Volume 2, Figure 4.1 - Indicative Masterplan [EN0110014/APP/6.2.4.1] illustrates the proposed internal haul routes. The Applicant has set out the following safety measures within the Outline PRoWPPMP [EN0110014/APP/7.8]: - Signage will be installed along the PRoW to inform users about construction activity. The signs will provide information on construction times and contact details for a public liaison officer; - Drivers must yield to all PRoW users, including equestrians; - Where applicable, access tracks will be widened to allow vehicles to pass PRoW users safely; - Traffic Marshals or Banksman will be positioned where relevant along a PRoW impacted by construction traffic, to hold vehicles if a PRoW user is present and advise PRoW users of the potential for construction vehicles;

Policy	Detail	Scheme Compliance
		- Speeds to be limited to 5-10mph near PRow; - The PRow will be kept clear of construction vehicles and apparatus outside of permitted construction hours so far as is practicable to do so; and - Any damage to the surface of the PRow directly attributable to the Scheme will be repaired as soon as practicable. Further mitigation measures for improving safety are outlined in the Outline CTMP [EN0110014/APP/7.6]. These include delivery management, temporary road signage, temporary traffic management, wheel washing arrangements, vehicle tracking and identification, preference for accreditation in procurement and Abnormal Indivisible Load management measures where relevant to ensure the safe and effective movement of HGVs and the provision of facilities for the drivers.
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.	The residual effects outlined in ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9] rely on controls established within the Outline CEMP [EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2], ES Volume 3, Appendix 9.1 - FRA and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1] and the Outline DEMP [EN0110014/APP/7.3]. These outline management plans and the Outline Surface Water Drainage Strategy, which is embedded in ES Volume 3, Appendix 9.1 - FRA and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1] 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 ES Volume 3, Appendix 9.1 - FRA and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1], 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. ES Volume 1, Chapter 6 - Climate Change [EN0110014/APP/6.1.6] 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 Outline CEMP [EN0110014/APP/7.1] and Outline OEMP [EN0110014/APP/7.2].

Table 940: Long Stratton Neighbourhood Plan 2019 to 2036 (made 2021)

Policy	Detail	Scheme Compliance
Policy LSNP – SC5 Maintaining good connectivity with outlying areas	Development proposals coming forward in the plan area will be expected to maintain or enhance good connectivity between Long Stratton and its outlying hamlets, including Stratton St Michael, Wacton Common, Wood Green and Tharston and Hapton. Proposals which result in the severance of walking and cycling links (including the Public Rights of Way Network) between rural communities and Long Stratton settlement will not be supported.	The Access and Rights of Way Plan [EN0110014/APP/2.7] and Outline PRoWPPMP [EN0110014/APP/7.8] set out an overview of the accessible routes and access points available to pedestrians and cyclists. The PRoWPPMP describes how footpaths in the vicinity of Long Stratton will be affected during construction, including the likely duration of diversions or closures which are proposed. Five PRoW at Long Stratton would be affected by closures of up to 1 month (short term). Two short sections of footpaths (FP3 and FP4) could be closed for a period which would as a maximum be the duration of the construction period (approximately 24 months). The proposed temporary closures would not affect severance for Stratton St Michael, Wacton Common, Wood Green and Tharston and Hapton. The footpaths affected are on routes between Long Stratton and Hempnall, and Long Stratton and Morningthorpe, and would particularly be associated with construction of the Cable Route (where the PRoW cross the CBC). The Applicant has set out the following general safety measures within the Outline PRoWPPMP [EN0110014/APP/7.8]: • Signage will be installed along the PRoW to inform users about construction activity. The signs will provide information on construction times and contact details for a public liaison officer; • Drivers must yield to all PRoW users, including equestrians; • Where applicable, access tracks will be widened to allow vehicles to pass PRoW users safely; • Traffic Marshals or Banksman will be positioned where relevant along a PRoW impacted by construction traffic, to hold vehicles if a PRoW user is present and advise PRoW users of the potential for construction vehicles; • Speeds to be limited to 5-10mph near PRoW; • The PRoW will be kept clear of construction vehicles and apparatus outside of permitted construction hours so far as is practicable to do so; and • Any damage to the surface of the PRoW directly attributable to the Scheme will be repaired as soon as practicable.

Policy	Detail	Scheme Compliance
Policy LSNP – DC7 Landscape and settlement character	To be supported, development proposals must be sympathetic to Long Stratton's local landscape character and Long Stratton's heritage, including its existing built environment and the landscape which surrounds the settlement. This means: • Development proposals coming forward on the edge of the existing settlement shall design in sensitive landscaping and lower densities to create an appropriate transition into the open countryside and avoid a hard perimeter to the edge of the settlement; • To the east of Long Stratton, beyond the new settlement boundaries (Map 1 – East Sensitivity Zone), key features of the ancient countryside as identified in Norfolk County Council's Historic Characterisation and Sensitivity Assessment will be protected including surviving historic greens, the lanes and the historic hedgerow boundaries; • All development proposals in the plan area to retain or enhance existing features of landscape value (including trees, hedgerows, water features etc) within the site and work within the context of existing features of landscape value in its surroundings; and • Beyond the Area Action Plan development boundary (see Appendix 2 of the Area Action Plan), the tranquil rural character of the outlying hamlets, including dark skies, shall be safeguarded. Landscaping schemes of individual development proposals need to be planned as an integral part of the development from the outset and implemented at an early stage of the build-out phase. To be supported, development proposals must include agreed timings for the implementation of landscaping works. For schemes involving the development of publicly accessible spaces, developers are encouraged to provide opportunities for residents to participate in community planting schemes.	The Design Approach Document [EN0110014/APP/7.17] sets out project level design principles which have influenced the design evolution to avoid and minimise harm on landscape. Project Level Design Principle 2.1 sets out that the Scheme should respond to the character of the Sites, informed by Natural England Character Area Profiles and South Norfolk Local Landscape Character Assessment and Place Making Guide SPD, including the character of the River Valleys. As set out in the Design Approach Document [EN0110014/APP/7.17] the Scheme is 'Landscape Led' and gives due weight to the intrinsic character and beauty of the surrounding area. Design Principles, Parameters and Commitments [EN0110014/APP/7.18] sets out the parameters and commitments for the Scheme that the detailed design must accord with as per Requirement 5 of the draft DCO [EN0110014/APP/3.1]. The project level design principles that have informed the Scheme design are set out within the Design Approach Document [EN0110014/APP/7.17]. The extensive planting proposed throughout the Site, as part of the Appendix B: Green Infrastructure Strategy Plan to the Outline LEMP [EN0110014/APP/7.4], would provide long term beneficial effects upon the landscape fabric of the Site itself. The design of the Scheme adheres to the mitigation hierarchy to reduce impacts and control any adverse effects on the environment throughout the lifecycle of the Scheme. The landscape mitigation proposed for the Scheme is further detailed in the Outline LEMP [EN0110014/APP/7.4] to be secured through a Requirement in Schedule 2 to the draft DCO [EN0110014/APP/3.1]. ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7] provides an assessment of the Scheme's impact on landscape and visual within the Order Limits, or that will be impacted by the Scheme. It also includes references to local and national landscape character assessments and associated studies as a means of assessing landscape impacts. ES Volume 3, Appendix 7.11 - Lighting Strategy [EN0110014/APP/6.3.7.11] aims to ensure that external lighting for the Scheme is designed to provide a safe working environment while avoiding unnecessary light pollution and reducing potential effects on the key receptors. The objective is to minimise adverse effects as far as practicable, while meeting essential safety and security requirements of

Policy	Detail	Scheme Compliance
		the Scheme. The strategy highlights the mitigation techniques for ensuring that lights have the least impact as possible.
Policy LSNP – DC10 Long Stratton Design Principles	A design led approach should be taken for all proposals. In adopting a design-led approach, applicants should be guided by the design principles set out in the Long Stratton Neighbourhood Plan Design Guidelines in relation to: • Pedestrian and cycle connectivity; • Edge treatments between the proposed and existing settlements; • Road dimensions and vehicle access; • Vehicle parking solutions; • Built form, including architectural details and material palette; and • Sustainability.	As detailed in the Design Approach Document [EN0110014/APP/7.17] and the Planning Statement [EN0110014/APP/7.14], the Scheme has undergone an iterative design process which has resulted in the delivery of a functional and efficient Scheme design which will deliver large amounts of renewable and low carbon energy while being sensitive to local context and surroundings, and minimising impacts on the environment as far as practicable. The Design Approach Document [EN0110014/APP/7.17] explains how the design of the Scheme has helped to mitigate adverse effects as the Scheme has evolved up to the point of DCO submission. IGP has adopted a series of corporate-level design principles for their projects within the UK to make sure that the design of IGP projects deliver benefits to communities, enhance biodiversity, manage adverse effects on the local environment and help tackle climate change by harnessing and storing renewable energy. These design principles are discussed in the Design Approach Document [EN0110014/APP/7.17]. The Applicant also developed a set of project level design principles, which will inform the design of the Scheme. These have and will inform decision-making, including at detailed design, to secure the best outcomes. Illustrations of how the project level design principles have been applied to the design of the scheme are given in the Design Approach Document [EN0110014/APP/7.17]. Good design outcomes will be ensured in the detailed design of the Scheme through adherence to the Design Principles, Parameters and Commitments [EN0110014/APP/7.18] and the Control Documents set out in the draft DCO [EN0110014/APP/3.1].
Policy LSNP – E12 Training Long Stratton's local workforce	Development proposals which will facilitate the delivery of skills training or apprenticeship schemes to the local people are strongly encouraged. Where relevant and appropriate, development proposals which are anticipated to create a high number of job opportunities will be required, via a S106 planning obligation, to invest in local training and/or apprenticeship schemes.	The Outline ESSCS [EN0110014/APP/7.10], which is secured via a Requirement in Schedule 2 to the draft DCO [EN0110014/APP/3.1], sets out the proposals to generate and enhance skills, training and education opportunities. The Applicant is committed to promoting apprenticeships, supporting local labour where practicable, and collaborating with local further and higher education providers, established initiatives and local businesses. A Skills, Supply Chain, and Employment Plan would be secured in line with the Outline ESSCS to support training, apprenticeships and supply chain opportunities during construction and periods of on-site infrastructure replacement during operation. Where feasible, the Scheme

Policy	Detail	Scheme Compliance
		would promote transferable skills to support workforce progression and stimulate local economic activity.
Policy LSNP GI16 – Long Stratton recreational open space standards	All development proposals will be required to make provision (either on-site or off-site as a commuted sum) for recreational open space commensurate with the level of development proposed in order to meet the needs generated by the development. Demonstrable regard should be had to South Norfolk Council's Open Space Supplementary Planning Document 2018, or any updates to this, when identifying appropriate requirements. New recreational open space should, wherever appropriate, be designed to contribute to local biodiversity for example through provision of ecological corridors (trees, hedges and scrub along boundaries for a wide range of species and carbon capture, and wildflower areas subject to relaxed cutting regimes away from key sports areas for pollinators) along boundaries and informal areas.	The Scheme would include the provision of new community accessible spaces for pedestrian use in Sub-Sites 4B, 7D and 7F. These spaces are located within the Order Limits to provide opportunities for informal recreation and amenity use. The community accessible space in Sub-Site 4B offers potential for archaeological interpretation and educational engagement, including interpretation signage, while the areas within Sub-Sites 7D and 7F provide opportunities for amenity use such as walking. The objectives and targets of the community accessible space, together with a framework for the management during the operation of the Scheme is set out in the Outline LEMP [EN0110014/APP/7.4].
Policy LSNP GI17 – Delivering green infrastructure in Long Stratton	Where under Local Plan provisions Green Infrastructure is required as part of new development in the plan area, the nature of the provision will respond to the following plan area priorities: - Locating and designing green infrastructure with a view to maximising accessibility and connectivity between neighbourhoods (existing and new) and outdoor recreational areas, taking into account and utilising opportunities to link up with existing public rights of way. - Relieving visitor pressure on ecologically sensitive sites in the vicinity of the plan area including Tyrrel's Wood and Wood Green through: - Creation of a new extensive area of common land within walking distance and on walking routes to and from existing and proposed residential areas - The creation of new areas of informal open space attractive to dog walkers on walking routes to and from existing/proposed residential areas	The Scheme proposes to deliver biodiversity and green infrastructure enhancements within an area currently dominated by intensively managed arable land, with no loss of irreplaceable habitats. Embedded design buffers would retain key landscape features, supported by strengthening existing hedgerows, new tree, woodland and grassland planting, restoration of ghost ponds, and the provision of skylark mitigation plots. Collectively, these measures would enhance habitat connectivity and contribute positively to the local landscape, with long-term management secured through the Outline LEMP [EN0110014/APP/7.4]. The extensive planting proposed throughout the Site, as part of the Appendix B: Green Infrastructure Strategy Plans to the Outline LEMP [EN0110014/APP/7.4], would provide long term beneficial effects upon the landscape fabric of the Site itself. The Scheme would include the provision of new community accessible spaces for walking in Sub-Sites 4B, 7D and 7F. These spaces would deliver new accessible space and are located within the Order Limits to provide opportunities for informal recreation and amenity use which will promote health and wellbeing. The community accessible space in Sub-Site 4B offers potential for archaeological interpretation and educational engagement, including interpretation signage, while the areas within Sub-Sites 7D and 7F provide opportunities for amenity use such as

Policy	Detail	Scheme Compliance
	- Maintain or improve connectivity to the countryside beyond the new bypass. - Recognise, protect and incorporate locally characteristic features including greens, hedgerows, woodlands and ponds and locally distinctive landscapes. - Retain and enhance connectivity for biodiversity through public rights of way, hedgerows, protection of water features and wildlife corridors. - Include provision designed for the purpose of promoting health and wellbeing (including physical exercise).	walking. The objectives and targets of the community accessible space, together with a framework for the management during the operation of the Scheme is set out in the Outline LEMP [EN0110014/APP/7.4]. The Access and Rights of Way Plan [EN0110014/APP/2.7] and Outline PRowPPMP [EN0110014/APP/7.8] set out an overview of the accessible routes and access points available to pedestrians and cyclists.
Policy LSNP GI18 – Green Infrastructure management	Development Proposals will be expected to provide robust arrangements for the future maintenance of all new green infrastructure areas and features (including public open space, new habitat provision, surface drainage infrastructure, landscape mitigation areas, pedestrian and cycle paths and related furniture and structures). This means: i. Where the developer transfers the adoption and responsibility for maintaining the open space over to Long Stratton Town Council (for spaces in the parished area of Long Stratton), over to the Tharston and Hapton Parish Council (for spaces in the parish of Tharston and Hapton) or over to another community body, there will be a requirement for future maintenance to be funded by the developer for a minimum of 10 years. In some circumstances, where the size and nature of the green infrastructure presents specific complexity to deem it necessary, this may be extended to 15 years to secure successful provision of the open space to the community it is intended to serve. ii. In line with South Norfolk's Open Spaces SPD adopted in September 2018, developers will be expected to follow the hierarchy of management in the Neighbourhood Plan area. For spaces in the Long Stratton parished area, the Long Stratton Town Council will have first refusal for the management of the space and for spaces in the parish of Tharston and Hapton, the	Long-term management of all new green infrastructure areas and features will be secured through the Outline LEMP [EN0110014/APP/7.4]. The green infrastructure areas and features will be managed by the Applicant.

Policy	Detail	Scheme Compliance
	Parish Council of Tharston and Hapton will have first refusal of the management of the space. iii. Due to the expectation set out in ii) above, the developer will be required, at an early stage, to consult Long Stratton Town Council and Tharston and Hapton Parish Council in the design and layout of proposed new open spaces.	
LSNP GI19 – Protecting existing sites of biodiversity value in the plan area	The sites identified on Map 7 are recognised for the value they contribute towards protecting and maintaining biodiversity in the parish. - Tyrrel's Wood County Wildlife Site - Wood Green County Wildlife Site - Wet Meadow on Swan Lane - Area of grassland with pond and hedges behind the allotments - Roadside nature reserves in the parish including Wood Lane Any development proposals which impact upon identified biodiversity assets including the sites listed here will contribute to, rather than detract from, their biodiversity value. When assessing possible impacts, consideration will be given to wildlife connectivity to and from these sites. Where a development proposal is likely to adversely impact a site of biodiversity value, the proposal will be refused unless the benefits of the development proposal in the location clearly outweighs the adverse impacts. Where significant impacts to biodiversity are likely to occur, permission will only be granted if impacts are adequately mitigated for or, as a last resort, compensated for. In all cases, development proposals will be expected to deliver net gains in biodiversity which means delivering measurable improvements for biodiversity by creating or enhancing habitats as part of the development proposal. New built structures which incorporate new biodiversity features such as green roofs, walls, bat and swift bricks, and permeable	ES Volume3, Appendix 8.1 Ecological Desk Study and Extended Habitat Survey [EN0110014/APP/6.3.8.1] identifies the sites in question. - Tyrrel's Wood CWS is 3.3km south of subsite 5A. - Wood Green CWS is 2.3km south of subsite 5A. ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] concludes that with regard to the CWS and RNR within and surrounding the Order Limits, with embedded measures in place, no significant residual adverse effects have been identified, and in addition there are no significant residual adverse ecology and biodiversity related effects expected across the Scheme's construction, operation and decommissioning phases. The other features are within Long Stratton, and are not a designated or non-designated sites so are not identified within the Survey, or assessed (they are outside of the study area). The expected residual beneficial effects outlined in ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] rely on controls established in the Outline CEMP [EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2], Outline DEMP [EN0110014/APP/7.3] and the Outline LEMP [EN0110014/APP/7.4] and are secured via corresponding requirements of the draft DCO [EN0110014/APP/3.1]. Section 8.8 of ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] sets out the mitigation measures embedded relevant to biodiversity into the Scheme. These measures are referred to within the Outline CEMP [EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2] and the Outline DEMP [EN0110014/APP/7.3] and secured via the draft DCO [EN0110014/APP/3.1].

Policy	Detail	Scheme Compliance
	boundaries between new development plots, are welcomed, and may be required as part of achieving a net gain in biodiversity as required in Policy LNGS5 of the Area Action Plan.	Landscape and ecological enhancements and mitigation measures for the Scheme are shown in the Outline LEMP [EN0110014/APP/7.4] . As presented in the BNG Report [EN0110014/APP/7.23] , the ecological mitigation and enhancement areas will deliver a net gain of 37.42% for onsite habitats, and a net gain of 31.35% for onsite hedgerow and tree lines while a requirement of the draft DCO [EN0110014/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.

Table 544: Tasburgh Neighbourhood Plan 2023-2038 (made 2024)

Policy	Detail	Scheme Compliance
TAS1: Natural assets	The following are recognised as important natural assets of the parish due to their landscape and/or biodiversity value, which should be conserved and enhanced (figure 15 and 16): 1. Tas Rural River Valley (Environmentally Sensitive Area) 2. Water meadows, Low Road 3. The Ford, Low Road 4. Horseshoe footpath, Low Road to the Enclosure 5. Churchyard of St Mary's the Virgin 6. Tasburgh Enclosure 7. Woodland behind Orchard Way 8. Marlpit 9. 1000-year-old oak (veteran tree) on Quaker Lane 10. Natural ponds 11. Ancient grassland <u>Loss of natural assets</u> Where loss or damage is unavoidable, the development shall provide for appropriate replacement planting or appropriate natural features on site together with a method statement for the ongoing care and maintenance of that planting. Where this approach is not practicable, appropriate off-site mitigation/compensation should be incorporated into the development proposal. In either case, a method statement for the ongoing care and maintenance of the planting should be included in the proposal. <u>Enhancing biodiversity</u> As appropriate to their scale, nature and location, development proposals should retain existing features of biodiversity value (including hedgerow and field margins, trees, veteran trees, grass verges, ancient grasslands, ponds and drainage ditches). Development proposals should identify how they will provide a minimum 10 percent net gain in biodiversity through, for example:	As a watercourse within 250m of the Site, the impacts on the Tas River Catchment are considered in the ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8], particularly the impact on aquatic species. The assessment concludes no significant effects are anticipated either during the construction or operation phases. ES Volume3, Appendix 8.1 Ecological Desk Study and Extended Habitat Survey [EN0110014/APP/6.3.8.1] identifies the Priority Habitat 'lowland deciduous woodland' which is part of '5. Churchyard of St Mary the Virgin' and '7. Woodland behind orchard way'. The assessment concludes that no significant adverse effects on the lowland deciduous woodland habitats are anticipated as a result of the operational phase of the Scheme. The other natural assets identified within TAS1 are within Tasburgh, and outside of the Site, and are not recorded as being undesignated or designated sites (for ecology) within ES Volume3, Appendix 8.1 Ecological Desk Study and Extended Habitat Survey [EN0110014/APP/6.3.8.1]. As set out in the Design Approach Document [EN0110014/APP/7.17] the Scheme is 'Landscape Led' and gives due weight to the intrinsic character and beauty of the surrounding area. ES Volume 1, Chapter 7 – Landscape and Visual [EN0110014/APP/6.1.7] identifies the Tas Rural River Valley as a sensitive Local Character Area (LCA), providing an assessment of the likely significant effects during all phases of the Scheme. The ES concludes that during construction, a significant effect is expected for LCA A1 Tas Rural River Valley. However, following the end of the construction activities, it is anticipated that there will be no change to the landscape character of this feature, due to the mitigation proposed. The Scheme proposes to deliver biodiversity and green infrastructure enhancements within an area currently dominated by intensively managed arable land, with no loss of irreplaceable habitats. Embedded design buffers would retain key landscape features, supported by strengthening existing hedgerows, new tree, woodland and grassland planting, restoration of ghost ponds where practicable, and the provision of skylark mitigation plots. Collectively, these

Policy	Detail	Scheme Compliance
	a. The creation of new natural habitats and improvements to, or connections between fragments of habitats identified above. b. The planting of additional native trees and hedgerows, for screening and landscaping purposes. c. Green areas between and in new developments. d. Soft site boundaries to new developments where adjacent to agricultural land, open spaces or settlement edge, through native hedgerows. e. Integrated bird boxes or nesting sites for hirundines, house sparrows, starlings and provision for bat boxes on the site.	measures would enhance habitat connectivity and contribute positively to the local landscape, with long-term management secured through the Outline LEMP [EN0110014/APP/7.4]. The extensive planting proposed throughout the Site, as part of the Appendix B: Green Infrastructure Strategy Plan to the Outline LEMP [EN0110014/APP/7.4], would provide long term beneficial effects upon the landscape fabric of the Site itself. The design of the Scheme adheres to the mitigation hierarchy to reduce impacts and control any adverse effects on the environment throughout the lifecycle of the Scheme. Landscape and ecological enhancements and mitigation measures for the Scheme are shown on Appendix B: Green Infrastructure Strategy Plans to the Outline LEMP [EN0110014/APP/7.4]. ES Volume 1, Chapter 8 - Ecology and Biodiversity [EN0110014/APP/6.1.8] sets out the mitigation measures embedded relevant to biodiversity into the Scheme. These measures are referred to within the Outline CEMP [EN0110014/APP/7.1], Outline OEMP [EN0110014/APP/7.2] and the Outline DEMP [EN0110014/APP/7.3] and secured via the draft DCO [EN0110014/APP/3.1]. As presented in the BNG Report [EN0110014/APP/7.23], the ecological mitigation and enhancement areas are predicted to provide a net gain of 37.42% for on-site habitats, and a net gain of 31.35% for onsite hedgerow and tree lines while a requirement of the draft DCO [EN0110014/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.
TAS3: Important local views	Development proposals should respect their landscape setting including any identified important local views within which they are located, or which they affect. The following views are identified as important in Tasburgh (figure 18 and 19): 1. From corner of Church Hill and Grove Lane westwards. 2. From Quaker Lane looking south southwest over the water meadow.	The Design Approach Document [EN0110014/APP/7.17] sets out project level design principles which have influenced the design evolution to avoid and minimise harm on landscape. Project Level Design Principle 2.1 sets out that the Scheme should respond to the character of the Sites, informed by Natural England Character Area Profiles and South Norfolk Local Landscape Character Assessment and Place Making Guide SPD, including the character of the River Valleys.

Policy	Detail	Scheme Compliance
	3. From the Village Hall playing field looking north and northwest. 4. From the Ford looking up northwest. 5. From Saxlingham Lane looking up Rainthorpe Hall Drive. 6. From the northeastern corner of the enclosure looking southwest towards St Mary's Church. 7. From the Horseshoe footpath looking north and northwest. 8. From the high point of the Enclosure looking down towards the valley. 9. From Flordon Bridge over the water meadows towards Low Road. 10. From Manor Farm Cottage to White Horse Farm Cottage. Development proposals within or affecting an important local view should demonstrate how they have responded positively to the view concerned and safeguarded its integrity and local importance.	ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7] 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. The viewpoints identified in TAS3 are principally directed to the north and western edges of Tasburgh, away from the Scheme. However, View 2 from TAS 3 is close to View Location 1 'Boudicca Way on Fairstead Lane' for Site 7. This view is across the Tas Rural River Valley, and ES Volume 1, Chapter 7 – Landscape and Visual [EN0110014/APP/6.1.7] identifies this, and acknowledges it as a highly sensitive viewpoint. The ES concludes that 'a Major level of significance and a Significant effect' are anticipated during the operational phase (both at year 1 and year 15). This is because although the level of activity would reduce (relative to construction), the effect would still result in a clearly noticeable change. The assessment indicates that these effects arise due to the adjacency of these receptors to the Order Limits or their position within the Order Limits. Furthermore, at these locations the mitigation planting would influence the openness of these views which has an influence on the receptor's visual amenity.
TAS4: Climate change, flood risk and surface water drainage issues	As appropriate to their scale, nature and location development proposals should: - demonstrate how they can mitigate their own flooding and drainage impacts, avoid an increase of flooding elsewhere and seek to achieve lower than greenfield runoff rates for flooding (see figure 20 flood risk); - respond positively to the advice and guidance on surface water drainage and the mitigation of flood risk obtainable from Norfolk County Council (as Lead Local Flood Authority) and the relevant Internal Drainage Board (as statutory Drainage Board for the Plan area); and - where appropriate, mitigate and adapt to climate change. Proposals for major development should include sustainable drainage systems unless it is impracticable to do so.	ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9] has been informed by ES Volume 3, Appendix 9.1 - FRA and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1] and assesses the likely impacts and effects of the Scheme in relation to hydrology, flood risk and drainage for the whole lifecycle of the Scheme. All impacts on the water environment are also assessed within ES Volume 1, Chapter 9: Water Environment [EN0110014/APP/6.1.9]. As outlined in ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9] and ES Volume 3, Appendix 9.1 - FRA and Outline Surface Water Drainage Strategy [EN0110014/APP/6.1.9.1], the Scheme masterplan has been sequentially designed to locate the most electrically sensitive infrastructure (e.g. PV arrays, the substation compounds, inverters and transformers) outside of Flood Zones 2 and 3 to mitigate against the risk of flooding.

Policy	Detail	Scheme Compliance
		ES Volume 3, Appendix 9.1 - FRA and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1] includes an Outline 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 outlined in ES Volume 3, Appendix 9.1 - FRA and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1], 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. In preparing measures to support climate change adaptation, consideration has been given to incorporating nature-based solutions into the Scheme. Proposals for Sustainable Drainage Systems (SuDS) have been included as part of the Scheme design, as set out in ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9]. ES Volume 3, Appendices 9.1 - FRA and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1] and supporting assessments and hydraulic modelling confirm that the construction, operation and decommissioning of the Scheme, with mitigation and best practice control measures, will remain safe for its lifetime and will not increase flood risk elsewhere, taking into account climate change. 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 [EN0110014/APP/3.1].
TAS5: Dark skies	Development proposals should take account of Tasburgh's existing dark skies (figure 22) and seek to limit the impact of light pollution from artificial light. Street lighting will not be supported on any development, unless there is a clear and compelling need to do so, for example highway safety on A140. For individual dwellings lighting necessary for security or safety should be designed to minimise the impact on dark skies by, for example, minimal light spillage, use of downlighting, movement	ES Volume 3, Appendix 7.11 - Lighting Strategy [EN0110014/APP/6.3.7.11] aims to ensure that external lighting for the Scheme is designed to provide a safe working environment while avoiding unnecessary light pollution and reducing potential effects on the key receptors. The objective is to minimise adverse effects as far as practicable, while meeting essential safety and security requirements of the Scheme. The lighting strategy highlights the mitigation techniques for ensuring that lights have the least impact as possible. The design of the Scheme adheres to the mitigation hierarchy to reduce impacts and control any adverse effects on the environment throughout the lifecycle of the

Policy	Detail	Scheme Compliance
	sensitive lighting and restricting hours of lighting. Lighting likely to cause disturbance or risk to wildlife should not be supported.	Scheme. The landscape mitigation proposed for the Scheme is further detailed in the Outline LEMP [EN0110014/APP/7.4] to be secured through a Requirement in Schedule 2 to the draft DCO [EN0110014/APP/3.1] .
TAS11: Historic core and Non-designated Heritage Assets	The area shown on figure 28 is identified locally as an important 'historic core' due to the setting of the Tasburgh Enclosure (Scheduled Monument) and St Mary the Virgin Church, round tower church (Grade I listed building). In addition to the parish's designated assets (Listed buildings and the Scheduled Monument), a number of buildings or structures (figure 29) are identified as Non-designated Heritage Assets due to their locally important character and historic features: 1. Barn Lodge, Church Road, Upper Tasburgh 2. Birch Grove, Church Road/Woodland Rise, Upper Tasburgh 3. Local Authority early pre-war and post-war housing, Church Road, Upper Tasburgh and Grove Lane, Lower Tasburgh 4. Old School House, Church Hill, Lower Tasburgh 5. Primitive Methodist Chapel, Church Hill, Lower Tasburgh 6. Tasburgh Grange, Low Road, Lower Tasburgh 7. The Malthouse, Low Road, Lower Tasburgh 8. Grange Meadow, Low Road, Lower Tasburgh 9. Forge Cottage, Low Road, Lower Tasburgh 10. Taas Ford, Low Road next to Forge Cottage, Lower Tasburgh 11. Bramble Cottage/Green More Cottage, Low Road, Lower Tasburgh 12. Waterloo Cottage/Mill View Cottage, Flordon Road, Lower Tasburgh 13. Old Post Office Cottage, Low Road, Lower Tasburgh 14. Tasburgh Hall, Corner Low Road, B1135 Development proposals should conserve these heritage assets in a manner appropriate to their significance. Proposals affecting a Non-designated Heritage Asset should give consideration to: a. The character, distinctiveness and important features of the heritage asset;	ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] 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 10.6 of ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] 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 3 [EN0110014/APP/6.3]: • Appendix 10.1 - Heritage Statement • Appendix 10.2 - Archaeological DBA • Appendix 10.3 - Geophysical Survey • Appendix 10.4 - Aerial Photograph Survey • Appendix 10.5 - Evaluation Trenching Report • Appendix 10.6 - Archaeological Mitigation Strategy ES Volume 3, Appendix 10.1 Heritage Statement [EN0110014/APP/6.3.10.1] sections 6 'Site 4' and section 9 'SUB-SITES 7A – 7C' identifies and describes the assets, and the individual effects on designated and non-designated assets at Tasburgh, including on Tasburgh Hillfort (Scheduled Monument). The results are summarised within ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10], which concludes that following the implementation of embedded and additional mitigation measures there will be no residual significant effects on any designated or non-designated assets as a result of the Scheme. Embedded mitigation measures such as removal of solar PV from fields due to heritage sensitivities, have reduced any potential significant adverse effects. The embedded and additional mitigation measures are documented within the: Outline CEMP [EN0110014/APP/7.1], Outline CTMP [EN0110014/APP/7.6], Outline OEMP [EN0110014/APP/7.2], Outline DEMP [EN0110014/APP/7.3], and Outline LEMP [EN0110014/APP/7.4] and are secured via requirements of the draft DCO [EN0110014/APP/3.1].

Policy	Detail	Scheme Compliance
	b. The setting of the heritage asset and its relationship to its immediate surroundings; c. The contribution that the heritage asset makes to the character of the area.	

Table 612: The Tivetshalls Neighbourhood Plan 2022-2042 (made 2022)

Policy	Detail	Scheme Compliance
TIV3: Design guideline and codes	All new development in the Neighbourhood Area must demonstrate high quality design, reinforce local character and respect the pattern of development, the rural character and the appearance of the Tivetshalls. Design that fails to have regard to local context or does not preserve or enhance the character and quality of the Tivetshalls will not be supported. To achieve this, development should demonstrate how it has taken account of the Tivetshalls Design Guidance and Codes. Development which does not have regard to local context, or which does not respond positively to the character and aesthetic qualities of the Tivetshalls will not be supported.	As detailed in the Design Approach Document [EN0110014/APP/7.17] and Section 9.2.65 of the Planning Statement [EN0110014/APP/7.14], the Scheme has undergone an iterative design process which has resulted in the delivery of a functional and efficient Scheme design which will deliver large amounts of renewable and low carbon energy while being sensitive to local context and surroundings, and minimising impacts on the environment as far as practicable. The Design Approach Document [EN0110014/APP/7.17] explains how the design of the Scheme has helped to mitigate adverse effects as the Scheme has evolved up to the point of DCO submission. IGP has adopted a series of corporate level design principles for their projects within the UK to make sure that the design of IGP projects deliver benefits to communities, enhance biodiversity, manage adverse effects on the local environment and help tackle climate change by harnessing and storing renewable energy. These design principles are discussed in the Design Approach Document [EN0110014/APP/7.17]. The Applicant also developed project level design principles to inform the design of the scheme. These have and will inform decision-making, including at detailed design, to secure the best outcomes. Illustrations of how the project level design principles have been applied to the design of the scheme are given in the Design Approach Document [EN0110014/APP/7.17]. Good design outcomes will be ensured in the detailed design of the Scheme through adherence to the Design Principles, Parameters and Commitments [EN0110014/APP/7.18] and the Control Documents set out in the draft DCO [EN0110014/APP/3.1].
TIV4: Non-designated Heritage Assets	In addition to Listed Buildings and designated heritage assets, the following buildings or structures (figure 18) are identified as Non-designated Heritage Assets due to their locally important character and historic features: 1. St. Mary's churchyard and Church Lane. 2. Tivetshall Primary School and adjoining schoolhouse. 3. Roman villa (farm).	ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] 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. The chapter concludes that there are no significant (in EIA terms) residual effects identified during the construction, operation, and decommissioning of the Scheme.

Policy	Detail	Scheme Compliance
	4. Old Forge. 5. Railway crossing properties. 6. Old style signposts. 7. Historic railway line. 8. Old milestone, Norwich Road. 9. The Broad Way, Tivetshall St. Mary. Development proposals should conserve these heritage assets in a manner appropriate to their significance. Proposals affecting a Non-designated Heritage Asset should give consideration to: - the character, distinctiveness and important features of the heritage asset; - the setting of the heritage asset and its relationship to its immediate surroundings; - the contribution that the heritage asset makes to the character of the area.	Section 10.6 of ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] 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 3 [EN0110014/APP/6.3]: Appendix 10.1 - Heritage Statement Appendix 10.2 - Archaeological DBA Appendix 10.3 - Geophysical Survey Appendix 10.4 - Aerial Photograph Survey Appendix 10.5 - Evaluation Trenching Report Appendix 10.6 - Archaeological Mitigation Strategy ES Volume3, Appendix 10.1 Heritage Statement [EN0110014/APP/6.3.10.1] identifies and describes the individual effects on Non Designated and Designated Heritage Assets. The heritage assets identified were considered, but were not progressed for detailed assessment due to a lack of intervisibility with the Site. ES Volume 1, Chapter 10 - Cultural Heritage [EN0110014/APP/6.1.10] concludes that following the implementation of embedded and additional mitigation measures there will be no residual significant effects on any designated or non-designated assets as a result of the Scheme. Embedded mitigation measures such as removal of solar PV from fields due to heritage sensitivities, have reduced any potential significant adverse effects. The embedded and additional mitigation measures are documented within the: Outline CEMP [EN0110014/APP/7.1], Outline CTMP [EN0110014/APP/7.6], Outline OEMP [EN0110014/APP/7.2], Outline DEMP [EN0110014/APP/7.3], and Outline LEMP [EN0110014/APP/7.4] and are secured via requirements of the draft DCO [EN0110014/APP/3.1].
TIV7: Walking, cycling and horse riding	The provision of new and/or the enhancement of existing footpaths, cycleways and bridleways will be supported.	The Scheme includes the creation of three new non-vehicular permissive paths in Sub-Sites 7F, 8B and 10B for the lifetime of the Scheme to provide pedestrians and horse and bicycle riders improved accessibility to the countryside and improved connectivity of the wider Public Rights of Way (PRoW) network. This is set out in the Access and Rights of Way Plan [EN0110014/APP/2.7] .
TIV8: Traffic and road safety	All development proposals must ensure that they do not result in any unacceptable impact on highway safety.	ES Volume 1, Chapter 11 - Transport and Access [EN0110014/ APP/6.1.11] describes the existing levels and provides an assessment

Policy	Detail	Scheme Compliance
		of the anticipated transport and access effects of the Scheme's construction, operation and decommissioning phases in accordance with this policy. An Outline CEMP [EN0110014/APP/7.1] accompanying the DCO Application sets out mitigation measures, management and monitoring that will be in place to minimise the environmental impacts of the Scheme during construction. The Outline CTMP [EN0110014/APP/7.6] provides a framework for the management of construction vehicle movements to and from the Scheme during the construction to reduce, as far as practicable, the impacts of the Scheme on the Local Road Network. The main access to the Site is along the A140 which is on the edge of Tivetshall Parish, as described within the CTMP. ES Volume 1, Chapter 11 - Transport and Access [EN0110014/APP/6.1.11] confirms early consideration of appropriate construction routes and access to the Scheme for construction traffic movements has been undertaken. Where possible the use of public roads has been minimised to move material and equipment around the site. This reduces potential congestion, increases highway safety and optimises site logistics. ES Volume 2, Figure 4.1 - Indicative Masterplan [EN0110014/APP/6.2.4.1] illustrates the proposed internal haul routes. To reduce the volume of construction staff and employee trips to the Scheme the Outline CTMP [EN0110014/APP/7.6] states a Travel Plan will be implemented. Construction workers will be encouraged to use minibus services, public transport, cycling, walking and car-sharing to travel to and from the Scheme.
TIV9: Parking	Development proposals for on-street parking will not be supported. New development should provide off-road parking through parking bays, drives or garages (large enough for modern cars), and incorporate electric car charging points. Spaces for visitors and parking or manoeuvring space for service vehicles should be designed into new developments.	A Framework Construction Worker Travel Plan is provided in the Outline CTMP [EN0110014/APP/7.6] and has set out the plan to reduce vehicle impacts associated with construction staff trips on the highway network. This plan encourages the use of sustainable modes of transport, where appropriate, and details measures such as staff shuttle services, provision of parking facilities, and any other proposed measures to reduce mode shift from private car use. 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.

Policy	Detail	Scheme Compliance
	Development proposals should have regard to the Tivetshall Design Guidance and Codes.	Good design outcomes will be ensured in the detailed design of the Scheme through adherence to the Design Principles, Parameters and Commitments [EN0110014/APP/7.18] and the Control Documents set out in the draft DCO [EN0110014/APP/3.1] .
TIV10: Landscape setting and views of community importance	Development proposals must respect their landscape setting including any identified important public views within which they are located, or which they affect. The uninterrupted views of St. Mary's Church and St. Margaret's Church are a significant part of the character of the parish. In addition the following views are identified as important public views (figure 22 and 23): 1. From St. Mary's ruin towards Primrose Hill. 2. From Primrose Hill towards St. Mary's ruin. 3. From Star Lane towards the Pulhams. 4. From Stony Road to St. Margaret's Church and Hales Street. 5. From south side of Station Road towards the Waveney Valley. 6. Between the railway crossing properties. Development proposals within or affecting an important view must demonstrate how they have taken account of the view concerned.	The Design Approach Document [EN0110014/APP/7.17] sets out project level design principles which have influenced the design evolution to avoid and minimise harm on landscape. Project Level Design Principle 2.1 sets out that the Scheme should respond to the character of the Sites, informed by Natural England Character Area Profiles and South Norfolk Local Landscape Character Assessment and Place Making Guide SPD, including the character of the River Valleys. As set out in the Design Approach Document [EN0110014/APP/7.17] the Scheme is 'Landscape Led' and gives due weight to the intrinsic character and beauty of the surrounding area. Section Design Principles, Parameters and Commitments [EN0110014/APP/7.18] sets out the parameters and commitments for the Scheme that the detailed design must accord with as per Requirement 5 of the draft DCO [EN0110014/APP/3.1]. The project level design principles that have informed the Scheme design are set out within the Design Approach Document [EN0110014/APP/7.17]. The extensive planting proposed throughout the Site, as part of the Appendix B: Green Infrastructure Strategy Plan to the Outline LEMP [EN0110014/APP/7.4], would provide long term beneficial effects upon the landscape fabric of the Site itself. The design of the Scheme adheres to the mitigation hierarchy to reduce impacts and control any adverse effects on the environment throughout the lifecycle of the Scheme. The landscape mitigation proposed for the Scheme is further detailed in the Outline LEMP [EN0110014/APP/7.4] to be secured through a Requirement in Schedule 2 to the draft DCO [EN0110014/APP/3.1]. ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7] provides an assessment of the Scheme's impact on landscape and visual within the Order Limits, or that will be impacted by the Scheme. It also includes references to local and national landscape character assessments and associated studies as a means of assessing landscape impacts.

Policy	Detail	Scheme Compliance
		The Scheme will not impact on any of the views of community importance identified in this policy, and the views of community importance are not identified as sensitive viewpoints (in terms of their susceptibility to change associated with the Scheme) within ES Volume 1, Chapter 7 - Landscape and Visual [EN0110014/APP/6.1.7]. However, two viewpoints are assessed as representative of effects from viewpoints on the edge of Tivetshall, and are considered to be sensitive with the ES. From these viewpoints there are views towards Site 2 (View Location 7) and the BESS Site (View Location 7). At all stages, the impact on the views from VL7 for Site 2, and LV7 for the BESS are considered to be Negligible/ Not Significant.
TIV11: Natural assets	The following are recognised as important natural assets of the parish due to their landscape and biodiversity value (see figure 25). The conservation and/or enhancement of the landscape and biodiversity value of these assets will be supported. 1. Tivetshall Wood. 2. Meadow land, Mill Road. 3. Rectory Wood. 4. Ancient meadow, Rectory Road. 5. Ancient meadow, Lodge Road. 6. The Ford, Star Lane. 7. Ponds. 8. Ancient hedgerows and trees. For large developments (10 or more dwellings, or commercial sites), biodiversity net gain should be achieved through one or more of the following and have a method statement for the ongoing care and maintenance: • the creation of new natural habitats, in particular through native species • the creation of a community woodland • natural buffers between new and existing development • the planting of additional trees and hedgerows • restoring and repairing fragmented biodiversity networks.	None of the features are directly affected by the Scheme, as the Scheme is not within the Parish. The Scheme proposes to deliver biodiversity and green infrastructure enhancements within an area currently dominated by intensively managed arable land, with no loss of irreplaceable habitats. Embedded design buffers would retain key landscape features, supported by strengthening existing hedgerows, new tree, woodland and grassland planting, restoration of ghost ponds, and the provision of skylark mitigation plots. Collectively, these measures would enhance habitat connectivity and contribute positively to the local landscape, with long-term management secured through the Outline LEMP [EN0110014/APP/7.4]. The extensive planting proposed throughout the Site, as part of the Appendix B: Green Infrastructure Strategy Plan to the Outline LEMP [EN0110014/APP/7.4], would provide long term beneficial effects upon the landscape fabric of the Site itself. The design of the Scheme adheres to the mitigation hierarchy to reduce impacts and control any adverse effects on the environment throughout the lifecycle of the Scheme. The landscape mitigation proposed for the Scheme is further detailed in the Outline LEMP [EN0110014/APP/7.4] to be secured through a Requirement in Schedule 2 to the draft DCO [EN0110014/APP/3.1]. The BNG Report [EN0110014/APP/7.23] sets out how a minimum of 10% net gain will be achieved for the Scheme (using the Defra Statutory Biodiversity Metric).

Policy	Detail	Scheme Compliance
	Development proposals should have regard to the Tivetshall Design Guidance and Codes.	
TIV13: Dark skies	Development proposals must take account of the area's dark skies. New street lighting should not be located at the edge of the settlement. In new developments, lighting necessary for security or safety should be designed to minimise the impact on dark skies by, for example, minimal light spillage, use of downlighting and restricting hours of lighting. Proposals including prominent lighting visible from the surrounding landscape will not be supported, unless it can be demonstrated that such lighting is required in the interests of safety and security. Proposals including lighting likely to cause disturbance or risk to wildlife should seek to mitigate such disturbance or risk.	ES Volume 3, Appendix 7.11 - Lighting Strategy [EN0110014/APP/6.3.7.11] aims to ensure that external lighting for the Scheme is designed to provide a safe working environment while avoiding unnecessary light pollution and reducing potential effects on the key receptors. The objective is to minimise adverse effects as far as practicable, while meeting essential safety and security requirements of the Scheme. The lighting strategy highlights the mitigation techniques for ensuring that lights have the least impact as possible. The design of the Scheme adheres to the mitigation hierarchy to reduce impacts and control any adverse effects on the environment throughout the lifecycle of the Scheme. The landscape mitigation proposed for the Scheme is further detailed in the Outline LEMP [EN0110014/APP/7.4] to be secured through a Requirement in Schedule 2 to the draft DCO [EN0110014/APP/3.1].
TIV14: Surface water drainage	Development proposals within the immediate locality of the areas identified below as having surface water drainage issues, should take account of all relevant evidence of flooding. Development must not cause or contribute to new flooding or drainage issues and should mitigate its own flooding and drainage impacts. There are a number of locations that have surface water drainage issues. The following locations within the parish (figure 41) are identified: - Rectory Road. - By Post Office. - Tinker's Lane end. - Station Road bend near A140 roundabout. - Ram Lane (3 locations). - Green Lane. - Crossing House. - Junction of Hall Road. - Opposite Village Hall. - Junction of Grove Road and Glebe Road. Corner of Mill Road and Stoney Road.	The surface water drainage issues identified are not affected by the Scheme. It is noted that the Scheme is not within the Parish. ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9] has been informed by ES Volume 3, Appendix 9.1 - FRA and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1] and assesses the likely impacts and effects of the Scheme in relation to hydrology, flood risk and drainage for the whole lifecycle of the Scheme. All impacts on the water environment are also assessed within ES Volume 1, Chapter 9 - Water Environment [EN0110014/APP/6.1.9]. The DCO Application is supported by ES Volume 3, Appendix 9.1 - FRA and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1], which considers the impacts of the Scheme on drainage. As outlined in ES Volume 3, Appendix 9.1 - FRA and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1], 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. ES Volume 3, Appendix 9.1 - FRA and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1] includes an Outline 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

Policy	Detail	Scheme Compliance
	6. Lodge Road. 7. Dip on A140. 8. Station Road.	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 [EN0110014/APP/3.1]. ES Volume 3, Appendix 9.1 - FRA and Outline Surface Water Drainage Strategy [EN0110014/APP/6.3.9.1] and supporting assessments and hydraulic modelling confirm that the construction, operation and decommissioning of the Scheme, with mitigation and best practice control measures, will remain safe for its lifetime and will not increase flood risk elsewhere, taking into account climate change.