

Byers Gill Solar
EN010139

7.6 Potential Main Issues for Examination (PMIE)

Planning Act 2008

APFP Regulation 5(2)(q)

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

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1. Introduction

1.1. Purpose of this document

- 1.1.1. This Potential Main Issues for Examination (PMIE) document has been prepared by RWE (the Applicant) to accompany an application for a Development Consent Order (DCO) for Byers Gill Solar (the Proposed Development).
- 1.1.2. The Applicant has voluntarily participated in the Early Adopters Programme [1], which has sought to trial components of an enhanced pre-application service and which includes the production of a PMIE. As such, this document has been prepared in accordance with guidance provided to the Applicant by Planning Inspectorate (PINS).
- 1.1.3. The purpose of the document is to provide the Examining Authority (ExA) with a summary of the principal areas of disagreement between the Applicant and stakeholders with whom the Applicant holds Principal Areas of Disagreement Statements (PADS).
- 1.1.4. This document has been prepared following the ongoing development and discussion of the draft PADS (appended to this document), which have been shared throughout the pre-application stage with stakeholders. It also reflects the contents of the Pre-application Issues Tracker shared with PINS.
- 1.1.5. This document will be updated throughout the Examination of the Proposed Development, to reflect the current positions of stakeholders and the Applicant, highlighting specifically where there are principal matters of disagreement between parties.
- 1.1.6. This document has been prepared and submitted in compliance with Regulation 5(2)(q) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 ('the APFP Regulations') which states: "*The application must be accompanied by... any other documents considered necessary to support the application.*"

2. List of PADS

2.1. Parties subject to a PADS

- 2.1.1. The Applicant has prepared draft PADS with a number of stakeholders during the pre-application stage and the preparation of the DCO Application, comprising organisations that RWE has a statutory duty to consult with under section 42 of the Planning Act 2008 (the Act).
- 2.1.2. The parties with which the Applicant has, at some point in the pre-application period, engaged with as part of the PADS process are listed in Table 2-1 below.

Table 2-1 List of parties engaged with as part of PADS process

Status under the Act	Organisation
Parties with which a draft PADS has been produced during the pre-application process	
Local Authorities (as defined under section 42(1)(b) of the Act)	Durham County Council (DCC)
	Darlington Borough Council (DBC)
Prescribed Consultees (as defined under section 42(1)(a) of the Act)	Natural England (NE)
	Environment Agency (EA)
Parties engaged with but with which no PADS has been prepared	
Local Authority (as defined under section 42(1)(b) of the Act)	Stockton-on-Tees Borough Council (SBC): no response to Applicant offer of PADS
Prescribed Consultee (as defined under section 42(1)(a) of the Act)	Historic England (HE): no requirement for PADS identified

- 2.1.3. In several instances, as set out in section 3 of this document, the use of PADS during the pre-application period has not resulted in a draft PADS being submitted with the DCO application. This is because the progression of discussions using the PADS has resulted in, at point of application, no principal areas of disagreement. PADS may be reintroduced during the pre-Examination and Examination period once stakeholders have reviewed the DCO application in detail, should any principal areas of concern arise.
- 2.1.4. The Applicant has also engaged with relevant statutory undertakers in relation to the Proposed Development and its impact on their assets. A summary of this engagement and the position at time of DCO application is provided in the Statutory Undertakers Position Statement (Document Reference 7.7).
- 2.1.5. The Applicant is continuing to engage with all parties and will provide a draft PADS during the Examination with relevant parties as required.

2.2. Engagement with PADS organisations

- 2.2.1. As set out in the Consultation Report (Document Reference 5.1) submitted with the DCO Application, the Applicant has sought to engage with the parties listed in Table 2-1 throughout the pre-application period. This has included via the co:design process, and statutory consultation.
- 2.2.2. Following the statutory consultation, which took place between 5 May 2023 and 16 June 2023, the Applicant has sought to continue ongoing engagement with the parties listed in Table 2-1 in order to resolve and respond to matters raised in their respective responses to the statutory consultation. The regard which the Applicant has had to responses to the statutory consultation is provided in the Consultation Report Appendices (Document Reference 5.2) and summarised in the main Consultation Report (Document Reference 5.1). Where any points have remained outstanding as a principal area of disagreement or have been raised outside of the formal statutory consultation process, this is included in the draft PADS.

3. Summary of current position

3.1.1. This section provides the current position of each draft PADS. Table 3-1 provides a high-level position, and where necessary includes further detail to aid understanding. The high-level positions used in the table are:

- **PADS in draft** – the draft PADS has been prepared by the Applicant and the relevant stakeholder, and comments have been provided. Discussions are ongoing to resolve outstanding issues, with the intention of providing a signed PADS by the end of the Examination.
- **No PADS submitted** – a draft PADS has been discussed between the Applicant and the stakeholder during the pre-application period but there are no principal areas of disagreement at time of DCO submission requiring submission of the PADS.
- **Final Signed PADS, with areas of disagreement remaining** – the PADS has been signed, and there remain areas of disagreement that the Applicant and respective stakeholder will not be able to agree on during the Examination stage.

3.1.2. Areas of disagreement which are apparent at the time of submission of the DCO application may become resolved during the course of the Examination. As such, where PADS have been submitted as in draft, all parties will continue to engage on these matters so that a final position can be shared at the close of the Examination.

Table 3-1 Summary of current position of PADS at time of DCO submission

Parties concerned	Position at time of DCO submission	Document Reference
Darlington Borough Council (DBC)	<p>PADS in draft and submitted with DCO application.</p> <p>The key principal matters reflected in the PADS relate to:</p> <p>a) Landscape and visual matters, including :</p> <ul style="list-style-type: none"> • Scope of village setting assessment • Viewpoints for the landscape and visual impact assessment (LVIA) • Landscape mitigation proposals and the extent to which they address significant effects on the setting of Great Stainton and Bishopton <p>b) Public rights of way (PROW) including:</p> <ul style="list-style-type: none"> • DBC has a preference for all permissive routes to be permanently diverted • Scope of the PROW management plan • Extent of change to amenity of PROW <p>c) Access and transport: DBC is concerned that there is insufficient detail on access and vehicle movements.</p>	7.6 – Appendix A.1

Parties concerned	Position at time of DCO submission	Document Reference
	<p>d) Glint and glare: DBC is concerned about the guidance and methodology of the glint and glare assessment.</p> <p>The draft PADS with DBC is provided for DCO submission as Appendix A.1 of this document.</p>	
Durham County Council (DCC)	<p>No PADS submitted. A draft PADS has been used as part of pre-application discussions. It was agreed in writing with DCC on 25 January 2024 that there are no principal points of disagreement at point of DCO submission which require a PADS to be submitted. Rather, there are various points of clarification to be discussed and likely resolved once DCC have reviewed the DCO application. If principal areas of disagreement arise once DCC have reviewed the DCO application, the Applicant and DCC are in agreement that a PADS would be drafted and submitted to the ExA.</p>	N/A
Environment Agency (EA)	<p>No PADS submitted. A draft PADS has been used as part of pre-application discussions. It was agreed in writing with the EA on 24 January 2024 that there are no principal points of disagreement at point of DCO submission which require a PADS to be submitted. It is agreed between the Applicant and the EA that further engagement would be undertaken post-consent relating to detailed design, including regarding the use of pad (ballasted) foundations for solar PV panels in areas of archaeology.</p> <p>If principal areas of disagreement arise once the EA have reviewed the DCO application, the Applicant and the EA are in agreement that a PADS would be drafted and submitted to the ExA.</p>	N/A
Natural England (NE)	<p>No PADS submitted. A draft PADS has been used as part of pre-application discussions. It was agreed in writing with NE on 2 February 2024 that there are no principal points of disagreement at point of DCO submission which require a PADS to be submitted.</p> <p>If principal areas of disagreement arise once NE have reviewed the DCO application, the Applicant and NE are in agreement that a PADS would be drafted and submitted to the ExA.</p>	N/A
Historic England (HE)	<p>No PADS submitted. The Applicant and HE have been in discussions during the pre-application period. Whilst the use of a PADS was discussed, it was determined that it was not necessary as there are no principal areas of disagreement.</p> <p>Prior to DCO application, HE has identified one matter for further consideration and discussion, following their review of the full DCO application, once available. This relates to the re-routing of the public right of way north of Bishopton (Footpath No. 4), shown as reference FP-Btn.4 on the Street Works, Rights of Way and Access Plans (Document Reference 2.3). HE consider that <i>'The fields adjoining the northern side which are contained within the application boundary or close</i></p>	N/A

Parties concerned	Position at time of DCO submission	Document Reference
	<p><i>to it provide an experience of the conservation area in its rural setting with the listed church at its centre. The impact on this setting as experienced from public footpaths needs to form part of the heritage assessment of the application.'</i></p> <p>Whilst the Applicant considers that this has been assessed in ES Chapter 6 Cultural Heritage and Archaeology (Document Reference 6.2.6), and has shared an extract of this assessment prior to DCO application, it is recognised that HE considers further assessment should be undertaken and that HE does not agree with the conclusions of the Applicant's assessment that the effect is negligible. It is considered by both parties that HE would benefit from receipt of the full DCO application to consider this matter further and discuss with the Applicant as necessary. HE and the Applicant will continue to review whether a PADS is appropriate to capture this matter following that further engagement, however at this time it is not considered by either party to be a principal matter of disagreement.</p> <p>If principal matters of disagreement arise once HE have reviewed the DCO application, the Applicant and HE are in agreement that a PADS would be drafted and submitted to the ExA.</p>	
<p>Stockton-on-Tees Borough Council (SBC)</p>	<p>No PADS submitted. As stated in section 3, whilst the Applicant has engaged with SBC during the pre-application period, the Applicant has not received a response to queries to SBC regarding the preparation of a PADS. The latest communication from the Applicant on this matter was 18 January 2024, to which no response has been received. The Applicant has also had focused engagement with the SBC Lead Local Flood Authority (LLFA) regarding the disapplication of Land Drainage Consent, draft protective provisions, and the overall drainage strategy for the Proposed Development. This is reflected in Other Consents and Licenses (Document Reference 7.3).</p>	<p>N/A</p>

Appendix A1 Darlington Borough Council PADS



BYERS GILL SOLAR

EN010139

DARLINGTON BOROUGH COUNCIL

**Principal Areas of Disagreement Summary
Statement (PADSS)**

Finalised: 8 February 2024

Ref	Area of disagreement	Summary of concern held by Darlington Borough Council	What needs to change, or be included or amended to overcome the disagreement?	Likelihood of the concern being addressed prior to submission of the application/ during the Examination
ES Chapter 7: Landscape and Visual				
DBC1	Village setting assessment	<p>DBC maintains that the assessment work needs to include additional analysis at a strategic/local level to identify baseline landscape conditions, to assess the effects of the development on the setting of villages, and to take account of worst-case visual effects to inform the landscape mitigation strategy. The assessment also needs to take account of the potential positive and negative effects of landscape mitigation on visual amenity/landscape character in order to fully assess potential landscape/visual effects of the development. It must not be assumed that all landscape/visual effects are positive or neutral if the solar panels are screened over the long term.</p> <p>Source: correspondence dated 06.02.2024 between Darlington Borough Council and the Applicant</p>	<p>The Applicant to provide a setting assessment, including an account of how the Proposed Development affects the visual amenity and landscape character of the local area.</p>	<p>Low</p> <p>The Applicant's position: A full baseline analysis is provided in ES Chapter 7 Landscape and Visual (Document Reference 6.2.7), along with an assessment of effects on villages character and setting. Consideration of effects on landscape and visual receptors has informed the design, and this is briefly described in ES Chapter 7 Landscape and Visual (Document Reference 6.2.7) and more fully in the Design Approach Document (Document Reference 7.2) and ES Chapter 2 The Proposed Development (Document Reference 6.2.7).</p> <p>No assumptions are made regarding the nature of effects and each effect reported is considered individually as to whether it is positive, neutral or adverse.</p>
DBC2	Viewpoints	<p>Key viewpoints can only be agreed following this further analysis, taking account of potential worst-case viewpoints, cumulative projects (to be agreed) and final design proposals, including mitigation.</p> <p>Source: correspondence dated 06.02.2024 between Darlington Borough Council and the Applicant</p>	<p>Glenkemp and DBC to provide details of the viewpoints they consider to be currently missing but necessary.</p>	<p>Low</p> <p>The Applicant's position: The Applicant considers that the 34 viewpoints considered in the ES adequately cover and provide a representative assessment of the Proposed Development.</p> <p>These were selected based on DBC's response to the scoping request, and subsequent correspondence with DBC officers at which point it was the Applicant's understanding that matters raised by DBC in relation to viewpoints had been addressed. The discussion was re-opened by DBC in August 2023, 3 months after the PEIR was published. At that stage some additional viewpoints were agreed and some moved to reach the 34 representative viewpoints which inform the assessment provided in the ES. request</p> <p>The Applicant has agreed to accommodate any supplementary viewpoints in an additional viewpoint analysis which can be provided to DBC, once DBC have identified which viewpoints they consider need adding based on the detailed landscape design. That viewpoint analysis could be submitted to PINS if requested. The Applicant does not</p>

Ref	Area of disagreement	Summary of concern held by Darlington Borough Council	What needs to change, or be included or amended to overcome the disagreement?	Likelihood of the concern being addressed prior to submission of the application/ during the Examination
				consider that additional viewpoint analysis is necessary to assess the likely significant environmental effects of the scheme, which are adequately assessed through the ES.
DB3	Landscape mitigation proposals	<p>The latest plans provided are more clearly presented than earlier versions and are welcomed, however the landscape mitigation proposals appear not to have addressed the potential significant adverse effects on the setting of Great Stainton and Bishopton. There are numerous references to ‘relaxation of hedge flailing’ throughout the labelling. What does this mean in term of the managed hedge height of existing hedges? The effects of these changes should be fully considered in the landscape/visual assessment and may influence the location of key viewpoints.</p> <p>Source: correspondence dated 06.02.2024 between Darlington Borough Council and the Applicant</p>	Fully consider the landscape and visual effects on Great Stainton and Bishopton in the landscape and visual assessment.	<p>Low</p> <p>The Applicant’s position: Design detail is provided within the Application documents, including within the Outline Landscape and Ecology Management Plan (LEMP) (Document Reference 6.4.2.14). The final design, including the treatment of existing hedges is considered within ES Chapter 7 Landscape and Visual (Document Reference 6.2.7).</p> <p>In accordance with best practice guidance (GLVIA 3 paras. 6.18-6.22), viewpoints are typically selected and agreed during the scoping stage of EIA projects, before the detailed design is prepared. The viewpoints are selected to represent the visual receptors and views within the study area and a range of distances and directions from the proposed development. They are in locations where there are open views towards the site, where it is safe to undertake photography and there is public access. In a small number of instances (e.g. Viewpoint 26 on Mill Lane, Bishopton) the final design will result in hedges screening the views of the solar panels. However, having reviewed the assessment outcomes the Applicant is of the opinion that viewpoints do not need to be relocated in response to the final design. In each case the effects depicted represent the visual changes that would arise for that receptor.</p>
ES Chapter 9: Land use and socioeconomics				
DBC4	Public Rights of Way (PRoW)	Given the proposed 40-year lifetime of the Proposed Development, DBC is not satisfied with the proposal of permissive routes being implemented when the definitive lines will be impassable. This may not be outlined as a permanent project however 40 years represents a very significant length of time and may be perceived as being permanent by the public. DBC are of the understanding that in addition to some affected ROWs being formally diverted, other permissive routes	DBC requests that permissive routes are not used as mitigation when the definitive route is obstructed. Consideration should only be given to the use of permissive routes when there are no other obstructions to the right of way network.	<p>Medium</p> <p>The Applicant’s position: The proposed permissive routes are proposed as an enhancement measure and not mitigation. They will be implemented during the operational stage of the Proposed Development, when the construction and implementation of the definitive rights of way have already been complete. The proposed diversions of the definitive routes will take place during the construction stage of the Proposed Development.</p>

Ref	Area of disagreement	Summary of concern held by Darlington Borough Council	What needs to change, or be included or amended to overcome the disagreement?	Likelihood of the concern being addressed prior to submission of the application/ during the Examination
		<p>will be put in place when the definitive route is obstructed.</p> <p>Source: correspondence dated 06.02.2024 between Darlington Borough Council and the Applicant</p>		<p>As outlined in the Outline PRow Management Plan (Document Reference 6.4.2.17), the Applicant has taken a hierarchical approach to the PRow proposals, and will ensure that a connected and open network is available throughout the construction period, and the lifecycle of the Proposed Development, wherever safe and practicable to do so.</p>
DBC5	Public Rights of Way (PRow)	<p>DBC would prefer that all affected routes were legally and permanently diverted.</p> <p>Source: correspondence dated 06.02.2024 between Darlington Borough Council and the Applicant</p>	<p>DBC requests that all routes to be diverted and new permissive routes provided become a permanent part of the PRow network.</p>	<p>Medium</p> <p>The Applicant's position: The routes that are part of the definitive mapping already will be permanently diverted. However, the permissive routes will be considered temporary in nature i.e., for the duration of the 40-years. Their permanent installation will be subject to landowner agreement, and will be discussed in advance of the Decommissioning stage. A separate Decommissioning Public Rights of Way Management Plan will be produced by the appointed contractor at that time, which will be done so in consultation with the relevant landowners and DBC.</p>
DBC6	Public Rights of Way (PRow)	<p>Subject to not all the affected routes being legally diverted, the PRow management plan must also include detail of:</p> <ul style="list-style-type: none"> • The creation of the permissive routes to meet the legislation and standard of the respective PRow designation. • The removal of the current definitive lines, including all related PRow infrastructure • Routes that are being legally diverted and updates to related infrastructure. • Maintenance of the permissive routes for the lifetime of the project, however long that may be, to the legislation and standard of the respective PRow designation (including to any updates to them). • Termination of the project: the removal of the permissive routes and the re-opening of the definitive lines as defined prior to the project to the legislation and standard at the time of re-opening. 	<p>The Applicant to produce and provide a PRow Management Plan as part of the DCO application.</p>	<p>Medium</p> <p>The Applicant's position: The Applicant has produced an Outline PRow Management Plan (Document Reference 6.4.2.17) as part of the DCO submission, which includes the timescales for diversions and provisions of permissive paths, the nature of temporary closures and user safeguarding during construction.</p> <p>The routes that the Applicant is proposing to permanently divert are being legally diverted. There are some which will be managed and maintained during construction, all of which will be secured via requirement of the DCO and are detailed within the Outline Public Rights of Way Management Plan (Document Reference 6.4.2.17) and the DCO (Schedule 4).</p> <p>The last two points will not be provided in the Outline PRow Management Plan (Document Reference 6.4.2.17) submitted with the DCO application, as this solely focuses on Construction.</p>

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		<p>Source: correspondence dated 06.02.2024 between Darlington Borough Council and the Applicant</p>		<p>The former will be subject to an updated Public Rights of Way Management Plan, to be produced by the appointed contractor should development consent be granted.</p> <p>For the latter, a separate Decommissioning Public Rights of Way Management Plan will be produced by the appointed contractor at that time, which will be done so in consultation with the relevant landowners and DBC.</p>
DBC7	Public Rights of Way (PRoW)	<p>The proposal will have a significant and dramatic impact on the PROW user experience of a large proportion of Darlington’s rural PROW which will be drastically altered. Consideration should be given to the extent to which the proposed development will adversely impact upon user experience of the ROW network in this area, and whether this can be appropriately mitigated for through landscape mitigation.</p> <p>Source: correspondence dated 06.02.2024 between Darlington Borough Council and the Applicant</p>	<p>Mitigation measures and additional permissive paths must be provided in order to compensate for the loss of these rural footpaths in the Borough, and consideration of the change in setting of these PRoWS must be included within the ES.</p>	<p>Low</p> <p>The Applicant’s position: A visual amenity assessment, including the effects on the amenity of the PRoW network is considered and in ES Chapter 7 Landscape and Visual (Document Reference 6.2.7). Consideration of effects on landscape and visual receptors has informed the design, and this is briefly described in ES Chapter 7 Landscape and Visual (Document Reference 6.2.7) and more fully in the Design Approach Document (Document Reference 7.2) and ES Chapter 2 The Proposed Development (Document Reference 6.2.7).</p>
ES Chapter 12: Traffic and Transport				
DBC8	Access	<p>DBC remains concerned regarding the lack of information at this stage about access details and associated vehicle movements. While it is acknowledged that much of the detail of the scheme will be dealt with at the requirements stage (should the Order be granted), DBC remain concerned about how concerns are communicated to ensure that any requirements allow DBC to give appropriate consideration to such fundamental issues as ensuring safe means of access to each of the construction compounds, and that the development will not give rise to unacceptable numbers of vehicle movements during the construction phase of the development. Across the 6 panel areas this has the potential to be significant.</p> <p>Source: correspondence dated 06.02.2024 between Darlington Borough Council and the Applicant</p>	<p>A fully detailed site-specific Construction Management Plan should be submitted for each phase of development (Areas A – F).</p>	<p>Medium</p> <p>The Applicant’s position: the Applicant has produced and submitted a Construction Traffic Management Plan (CTMP) (Document Reference 6.4.2.8) as part of the DCO application, which includes details of how construction traffic will be managed and mitigated across the site. To clarify, one singular CTMP will be submitted with the application, and not an individual plan per Panel Area.</p> <p>The proposed access and egress point are shown on the Street Works, Rights of Way and Access Plans (Document Reference 2.3) and the Works Plans (Document Reference 2.2).</p> <p>The Applicant is committed to ongoing engagement with DBC on this matter, and DBC will have the opportunity to communicate any concerns on the proposed access routes during the Examination period.</p>

Ref	Area of disagreement	Summary of concern held by Darlington Borough Council	What needs to change, or be included or amended to overcome the disagreement?	Likelihood of the concern being addressed prior to submission of the application/ during the Examination
Other: Glint and Glare				
DBC9	Assessment methodology	<p>DBC query whether the 'Pagerpower Solar Photovoltaic and Building Development – Glint and Glare Guidance 4th edition, September 2022' should be considered the authoritative guidance to be used by the LPA in assessing the Byers Gill updated Solar Photovoltaic Glint and Glare Study.</p> <p>Source: correspondence dated 06.02.2024 between Darlington Borough Council and the Applicant</p>	Confirmation from PINS that PagerPower's guidance is to be considered the authoritative piece of guidance in this regard.	<p>High</p> <p>The Applicant's position: as evidenced in ES Appendix 1.1 Competent Expert Evidence (Document Reference 6.4.1.1), Pagerpower and the consultants who have carried out the Solar Photovoltaic Glint and Glare Study (Document Reference 6.4.2.2) are to be considered competent experts and trusted advisors in this field.</p>
DBC10	Period of time within the assessment	<p>DBC would like to see further explanation for the selection of less than 60 minutes on any given day as they have seen assessments that have used a shorter time period or provided information on the number of minutes per day the property will be impacted.</p> <p>Source: Page 7 of Statutory Consultation response (15.06.2023)</p>	The Applicant to provide further information on this within the ES.	<p>High</p> <p>The Applicant's position: the Applicant has submitted a Solar Photovoltaic Glint and Glare Study (Document Reference 6.4.2.2), which contains further justification for the assessment criteria. The criteria is considered standard methodology developed on the basis of over 1,000 assessments and is based on the fourth edition of Pager Power's Glint and Glare Guidance Document¹.</p> <p>The guidance document explains why applying a strictly scientific approach to determining threshold limits is difficult, and how they were determined, in particular 6.14: Shadow flicker guidance states that effects for more than 30 minutes per day, over 30 hours of the year, is significant and requires mitigation. Considering the information presented within Section 6.5, it is deemed appropriate to consider the effects of glint and glare less significant than shadow flicker. Therefore, the duration beyond which mitigation should be required for glint and glare is longer than for shadow flicker.</p>
DBC11	Height of assessment	<p>DBC query whether the height of the receptor modelling at 1.8m (corresponding to ground floor) and whether the glint and glare assessment should be made at a height that corresponds with first floor level.</p> <p>Source: Page 8 of Statutory Consultation response (15.06.2023)</p>	The Applicant to provide further information on this within the ES.	<p>High</p> <p>The Applicant's position: For dwellings, a recommended additional height of 1.8 metres above ground level should be added to account for eye level on the ground floor, with additional floors being assessed as required. Additional heights should be considered where a receptor is higher</p>

¹ [Solar-Photovoltaic-Glint-and-Glare-Guidance-Fourth-Edition.pdf \(pagerpower.com\)](https://www.pagerpower.com/Solar-Photovoltaic-Glint-and-Glare-Guidance-Fourth-Edition.pdf)

Ref	Area of disagreement	Summary of concern held by Darlington Borough Council	What needs to change, or be included or amended to overcome the disagreement?	Likelihood of the concern being addressed prior to submission of the application/ during the Examination
				<p>than a first floor. Modelling is recommended for ground floor receptors because it is typically the most occupied during daylight hours.</p> <p>This is the standard approach on over 1200 glint and glare assessments. PagerPower still find that the ground floor is the most occupied during daylight hours in most houses, because that's where the living room and kitchen typically are. This changes with apartment buildings, or where specific concerns are raised, for example by a dwelling owner who may have an office space on the first floor. This is becoming slightly more common now with the shift to more people working from home, however it has been found hat the best approach is still to model the ground floor initially but consider visibility from all floors. The results for first and ground floor typically do not differ significantly, therefore modelling output for both is not really necessary, it is sufficient to consider modelling output for one and visibility for both.</p>