
EAST YORKSHIRE SOLAR FARM

East Yorkshire Solar Farm
EN010143

Planning Statement

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Executive Summary

- ES1 East Yorkshire Solar Farm Limited (the Applicant) is applying for a Development Consent Order (DCO Application) under section 37 of the Planning Act 2008 (PA 2008) for East Yorkshire Solar Farm (the Scheme).
- ES2 The Scheme comprises the construction, operation (including maintenance), and decommissioning of a solar photovoltaic (PV) electricity generating facility with export connection to the national grid, at National Grid Drax Substation.
- ES3 The Scheme is defined as a Nationally Significant Infrastructure Project (NSIP) under Section 14(1)(a) and 15(2) of the PA 2008 due to it generating capacity being greater than 50 megawatts (MW). The DCO Application will be determined by the Secretary of State for Energy Security and Net Zero (Secretary of State).
- ES4 This Planning Statement provides an assessment of the Scheme against the relevant policy and legislative framework. Where appropriate, it references relevant chapters of the Environmental Statement (“ES”) and other reports and assessments which together form the comprehensive and detailed evidence base produced in support of this DCO Application.
- ES5 Currently there are no National Planning Statements (NPS) designated which specifically consider solar developments although these are currently being reviewed and a draft suite of Energy NPS has been consulted on which incorporates specific policies for solar photovoltaic generation NSIPs. Therefore, the Application is anticipated to be determined in accordance with Section 105 of the PA 2008 whereby the Secretary of State must have regard to:
- i. Any Local Impact Report.
 - ii. Any Prescribed Matters.
 - iii. Any other matters the Secretary of State considers to be important and relevant.
- ES6 East Riding of Yorkshire Council and North Yorkshire Council (as host authorities) will have the opportunity to prepare Local Impact Reports (LIR) following submission of the DCO Application. This Planning Statement demonstrates the acceptability of the Scheme in relation to local planning policy.
- ES7 Prescribed matters that are relevant to the DCO Application are set out in the Infrastructure Planning (Decisions) Regulations 2010 (as amended) (the Decisions Regulations) and include Regulation 3 (regard to preserving listed buildings, conservation areas and scheduled monuments) and Regulation 7 (regard to the United Nations Environmental Programme Convention on Biological Diversity of 1992).
- ES8 It is considered that the following NPSs would be important and relevant to the Secretary of State’s decision:
- i. Overarching National Policy Statement for Energy EN-1 (NPS EN-1).

- ii. National Policy Statement for Renewable Energy EN-3 (NPS EN-3).
 - iii. National Policy Statement for Electricity Networks Infrastructure EN-5 (NPS EN-5).
 - iv. Draft Overarching National Policy Statement for Energy (EN-1) (Draft NPS EN-1).
 - v. Draft National Policy Statement for Renewable Energy (EN-3) (Draft NPS EN-3).
 - vi. Draft National Policy Statement for Electricity Networks Infrastructure (EN-5) (Draft NPS EN-5).
- ES9 Other national and local policies considered relevant are explained in section 2 of this Planning Statement and include relevant local plans.
- ES10 Draft NPS EN-1 sets out the transitional arrangements for applications accepted for examination before the new draft energy NPS are designated. It is considered that the draft NPS will have significant weight given that they are in line with other national policy documents for renewable energy.
- ES11 Sections 1 – 4 of this Planning Statement provide details on the legislative and policy context for the Scheme, its location and Order limits, and a summary of the operation, construction and decommissioning phases of the Scheme.
- ES12 Section 5 sets out the need and benefits of the Scheme. As identified in national policy and the Government’s strategy there is an urgent need to bring forward large scale solar development in order to meet targets for decarbonisation and net zero. The Scheme will deliver these policy aims, providing a significant amount of low carbon electricity over its 40 year lifetime; and providing resilience, security and affordability of electricity supplies due to its large scale. It will therefore be a critical part of the national portfolio of renewable energy generation that is required to decarbonise its energy supply quickly.
- ES13 The Scheme will also deliver other more localised local economic, social and environmental benefits. These include substantial biodiversity net gain, improvements to soil quality; improvements to the existing PRow network through the provision of permissive paths; and significant employment generation during construction.
- ES14 Section 6 of this Planning Statement provides a detailed assessment of the Scheme against the policies which the Applicant considers are likely to be important and relevant to the Secretary of State’s decision. Appendix A NPS Accordance Tables and Appendix B Local Policy Accordance Tables of this Planning Statement also set out compliance with individual relevant policies.
- ES15 Through careful design, the Scheme seeks to avoid and mitigate impacts on the environment and sensitive receptors, whilst ensuring that the Scheme will make a significant contribution to the UK’s urgent requirement for the delivery of large amounts of new renewable energy generation capacity and infrastructure.
- ES16 Section 7 provides a conclusion following the detailed assessment of the Scheme and its likely effects on the environment and sensitive receptors. It concludes that in terms of the overall planning balance, the clear and

substantial benefits of the Scheme clearly outweigh any adverse effects, which would be localised, short-term temporary and/or reversible at the end of the Scheme's lifetime.

- ES17 This Planning Statement demonstrates that the Scheme is in accordance with relevant national and local policy considered to be important and relevant and that substantial weight should be given to need when considering applications for consent under the PA 2008 (Ref. 1). It 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.

1. Introduction

1.1 Overview of the Scheme

- 1.1.1 This Planning Statement has been prepared on behalf of East Yorkshire Solar Farm Limited (hereafter referred to as 'the Applicant') in relation to an application for a Development Consent Order (DCO) for East Yorkshire Solar Farm (hereafter referred to as 'the Scheme'). The application for the DCO (the DCO Application) is submitted to the Planning Inspectorate, with the decision whether to grant a DCO being made by the Secretary of State for Energy Security and Net Zero (the 'Secretary of State') pursuant to the Planning Act 2008 (A 2008) (Ref. 1).
- 1.1.2 The Scheme will comprise the construction, operation (including maintenance), and decommissioning of a solar photovoltaic (PV) electricity generating facility, with a total capacity exceeding 50 megawatts (MW) and export connection to the national electricity transmission system at National Grid's Drax Substation.
- 1.1.3 The Order limits comprise approximately 1,276 hectares (ha) of land which includes the Solar PV Site, Ecology Mitigation Area, the Interconnecting Cable Corridor, the Grid Connection Corridor, and Site Accesses. The Solar PV Site, Ecology Mitigation Area, and the Interconnecting Cable Corridor and associated Site Accesses lie wholly within the administrative area of East Riding of Yorkshire Council, whilst the Grid Connection Corridor which links the Solar PV Site to the National Grid Drax Substation and associated Site Accesses lie within the administrative areas of East Riding of Yorkshire Council and North Yorkshire Council.
- 1.1.4 The **Location Plan [EN010143/APP/2.6]** shows the Order limits for the Scheme.
- 1.1.5 As set out in detail in Section 2 of this Planning Statement, the Scheme is a Nationally Significant Infrastructure Project (NSIP). In accordance with Part 4 of PA 2008 (Ref. 1), development consent is required for development to the extent that the development is or forms part of an NSIP. Under Section 104 of the PA 2008 (Ref. 1), a DCO application must be decided in accordance with the relevant National Policy Statement (NPS) if it is in force prior to an application being made.
- 1.1.6 Currently there is no NPS designated which specifically considers solar generating stations. Therefore, Section 105 of the PA 2008 (Ref. 1) is applicable whereby the Secretary of State must have regard to any Local Impact Report, any prescribed matters, and any other matters the Secretary of State considers to be important and relevant to a decision. The Energy NPSs, set out in detail in Section 2 of this Planning Statement, are deemed important and relevant to the Secretary of State's decision, therefore this Planning Statement provides an assessment of the Scheme against them, along with other important and relevant legislation and policy. It should however be noted that the draft NPSs for Energy published in March 2023 are anticipated to be designated before the end of 2023. Should this occur prior to the DCO Application being accepted then it is anticipated (according to draft NPS EN-1 (Ref. 2)) that the determination of the DCO Application would be under Section 104 of the PA 2008 (Ref. 1).

- 1.1.7 Overarching NPS for Energy (EN-1) (NPS EN-1) (Ref. 3) states that “*there is an urgent need for new (and particularly low carbon) energy NSIPs to be brought forward as soon as possible and certainly in the next 10 to 15 years*” (paragraph 3.3.15). The Scheme will support the Government’s current and emerging energy policy on renewable energy (set out in Draft NPS EN-3 (Ref. 4)) which recognises the need for ‘sustained growth’ in solar capacity to meet net zero emissions by 2050, with solar being a key part of the Government’s strategy for low-cost decarbonisation of the energy sector and ensure security, reliability and affordability of energy supply.
- 1.1.8 Draft NPS EN-1 (2023) (Ref. 2) provides that solar along with wind is expected to be the main form of electricity generation helping to reduce costs and provide clean and secure sources of electricity supply (paragraph 3.3.19). The Scheme therefore represents an excellent opportunity to deliver a critical part of the UK’s portfolio of renewable energy generation that is urgently required.

1.2 The Applicant

- 1.2.1 The Applicant (East Yorkshire Solar Farm Limited) is a wholly owned subsidiary of BOOM Developments Limited who specialise in non-subsidised solar and battery storage projects. BOOM Developments Limited was founded in 2020, and the name BOOM is an acronym for Build Own Operate Maintain. This reflects the organisation’s intentions to be involved in sustainable energy projects from the beginning of a project through to its operation.
- 1.2.2 The BOOM Managing Director and team have been responsible in previous roles for constructing more than 700 MW of solar developments in the UK between 2015 and 2017 and developing more than 850 MW of solar projects, including the UK’s first NSIP solar PV project Cleve Hill which was granted a development consent order in 2020. In 2021, the UK based BOOM, partnered with the Pelion Green Future group of companies based across Australia, America and the European mainland.
- 1.2.3 BOOM is committed to making a significant positive impact on climate change and the achievement of the UK Government’s aim for a fully decarbonised, reliable and low-cost power system by 2035 and net zero emissions by 2050.

1.3 Definition of the Scheme as a Nationally Significant Infrastructure Project (NSIP) and EIA Development

- 1.3.1 The Scheme is an onshore generating station in England exceeding a 50 MW generating capacity and is therefore classified as a NSIP under Sections 14(1)(a) and 15(2) of the PA 2008 (Ref. 1). The PA 2008 (Ref. 1) requires a DCO to be obtained for the development of NSIPs.
- 1.3.2 Section 115 of the PA 2008 (Ref. 1) also states that a DCO can include consent for ‘associated development’, which is development that is not an NSIP in its own right but is associated with the NSIP. The elements of the Scheme that constitute the NSIP and the elements that constitute associated development are defined in **Schedule 1** of the **draft DCO [EN010143/APP/3.1]** as well as summarised in Section 2 of this Planning Statement.

- 1.3.3 A DCO may include provisions that remove the requirements to obtain other consents. A **Consents and Agreements Position Statement [EN010143/APP/3.3]** explains those other consents and licenses that are or may be required under other legislation that will be sought separately from the DCO for the construction and operation of the Scheme. A deemed Marine licence is included in the **draft DCO [EN010143/APP/3.1]** which is required for the grid connection works where they interact with the River Ouse (which is tidal in the area which overlaps the Order limits).
- 1.3.4 The Scheme is 'EIA Development' as defined by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) (Ref. 5). An Environmental Impact Assessment has been undertaken and is reported by the **Environmental Statement (ES) [EN010143/APP/6.1]** submitted with the DCO Application. In undertaking the EIA and preparing the **ES [EN010143/APP/6.1]**, the Applicant has taken account of the Scoping Opinion received on 20 October 2022, which can be found in **Appendix 1-2, ES Volume 2 [EN010143/APP/6.2]**.

1.4 Purpose and Structure of the Planning Statement

- 1.4.1 This Planning Statement is submitted as part of a suite of supplementary documents which support the DCO Application, in accordance with regulation 5(2)(q) and regulation 6(3) of the Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 (as amended) (the APFP Regulations) (Ref. 6).
- 1.4.2 The purpose of this document is to provide an overview of the Scheme and its impacts, and to present the Applicant's consideration of the Scheme against the provisions of the legislation and policies considered relevant to the Secretary of State's decision.
- 1.4.3 The remainder of the Planning Statement is structured as follows:
- a. **Section 2** – provides an overview of the decision-making framework, legislation and policy context as well as other important and relevant considerations.
 - b. **Section 3** – describes the Order limits and the surrounding areas and summarises the relevant planning history within the Order limits.
 - c. **Section 4** – provides a summary of the Scheme and its components.
 - d. **Section 5** – describes the need and the benefits of the Scheme.
 - e. **Section 6** – provides an assessment of the Scheme against the relevant legislative and policy context as well as other important and relevant considerations.
 - f. **Section 7** – provides an assessment of the planning balance of the Scheme and overall conclusion in terms of the Scheme's compliance with relevant legislation and policy.
 - g. **Appendix A: NPS Accordance Tables** – sets out an appraisal of the Scheme against the policies in the Energy NPSs.
 - h. **Appendix B: Local Policy Accordance Tables** – sets out an appraisal of the Scheme against relevant and important local policies.

- i. **Appendix C: Heritage Statement** – provides an assessment of harm on heritage assets as a result of the Scheme.
- j. **Appendix D: Mineral Plan Policies Map** – provides extracts from East Riding of Yorkshire’s mineral plan policies map.

1.5 Relationship of the Planning Statement to the DCO Application

1.5.1 In assessing the Scheme against relevant policy and demonstrating the overall planning case for the Scheme, this Planning Statement draws upon the conclusions of other documents accompanying the DCO Application, interpreting them as necessary within the context of relevant policy and planning considerations. This Planning Statement, therefore, draws upon and should be read alongside the:

- a. **Draft DCO [EN010143/APP/3.1];**
- b. **Consultation Report [EN010143/APP/5.1];**
- c. **Environmental Statement (ES), Appendices, Figures and Non-Technical Summary [EN010143/APP/6.1/6.2/6.3/6.4];**
- d. **Statement of Need [EN010143/APP/7.1];**
- e. **Design and Access Statement [EN010143/APP/7.3];**
- f. **Outline Design Principles Statement [EN010143/APP/7.3];**
- g. **Framework Construction Environmental Management Plan [EN010143/APP/7.7];**
- h. **Framework Operational Environmental Management Plan [EN010143/APP/7.8];**
- i. **Framework Decommissioning Environmental Management Plan [EN010143/APP/7.9];**
- j. **Framework Soil Management Plan [EN010143/APP/7.10];**
- k. **Biodiversity Net Gain Assessment Report [EN010143/APP/7.11];**
- l. **Habitats Regulations Assessment Report [EN010143/APP/7.12];**
- m. **Framework Public Rights of Way Management Plan [EN010143/APP/7.13];**
- n. **Framework Landscape and Ecological Management Plan [EN010143/APP/7.14];** and
- o. **Framework Skills, Supply Chain and Employment Plan [EN010143/APP/7.15].**

1.5.2 The **Section 55 Checklist [EN010143/APP/1.5]** and the **Guide to the Application [EN010143/APP/1.2]** set out the structure of the DCO Application and how the DCO Application satisfies the relevant requirements of legislation and guidance concerning the preparation, assessment and submission of applications, including:

- a. The APFP Regulations (Ref. 6);
- b. The Infrastructure Planning (Compulsory Acquisition) Regulations 2010 (Ref. 7);

- c. The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the “EIA Regulations”) (Ref. 5);
 - d. The Department for Communities and Local Government’s Planning Act 2008: Application form guidance (2013) (Ref. 8); and
 - e. The Planning Inspectorate’s Advice Note Six: Preparation and submission of application documents (2022) (Ref. 9).
- 1.5.3 The full schedule of documents submitted with this application is set out in the **Electronic Application Index [EN010143/APP/1.5]**.

2. Legislative and Policy Context

2.1 Introduction

- 2.1.1 This section outlines the legislative framework and the planning policy context for the Scheme. Section 2.2 sets out the relationship of the Scheme with the PA 2008 (Ref. 1) and introduces the national and local planning policy and other documents that the Secretary of State may consider to be important and relevant.
- 2.1.2 This section of the Planning Statement is supported by **Appendix A: NPS Accordance Tables** and **Appendix B: Local Policy Accordance Tables**, which identify the policies that the Secretary of State may consider to be important and relevant and presents an appraisal of compliance with these policies.

2.2 The Basis for Decision-Making

Planning Act 2008

- 2.2.1 The PA 2008 (Ref. 1) provides the legislative basis and defines the application process under which consent for NSIPs is sought.
- 2.2.2 The Scheme is defined as an NSIP under Section 14(1)(a) and 15(2) of the PA 2008 (Ref. 1) (as amended) as it meets the following criteria:
- a. The Scheme comprises the construction of a generating station (Section 14(1)(a) of the PA 2008 (Ref. 1));
 - b. It would be located in England (Section 15(2)(a) of the PA 2008 (Ref. 1));
 - c. It would not generate electricity from wind (Section 15(2)(aa) of the PA 2008 (Ref. 1));
 - d. It would not be an offshore generating station (Section 15(2)(b) of the PA 2008 (Ref. 1)); and
 - e. Its capacity would be more than 50 MW (Section 15(2)(c) of the PA 2008 (Ref. 1)).
- 2.2.3 In accordance with Part 4 of PA 2008 (Ref. 1), a DCO is required for the development of an NSIP. This DCO Application primarily seeks consent for the construction of a generating station with a capacity of more than 50 MW, as the principal development. This includes the development of solar panels fitted to mounting structures and the field stations which provide the transformer, inverters, and switchgear.
- 2.2.4 Section 115(2) of the PA 2008 (Ref. 1) states that a DCO can include consent for associated development which is development that is not an NSIP on its own right but is associated with the NSIP. Examples of associated development might include development that supports construction, operation, or decommissioning or which helps address impacts of the NSIP. The NSIP and associated development works are defined in Schedule 1 of the **draft DCO [EN010143/APP/3.1]** and explained in the **Explanatory Memorandum [EN010143/APP/3.2]**.

- 2.2.5 Guidance on associated development for major infrastructure projects (Ref. 10) has been issued by the Department for Communities and Local Government (DCLG) in 2013. The guidance states in Paragraph 6 that associated development will “*be typical of development brought forward alongside the relevant type of principal development or of a kind that is usually necessary to support a particular type of project*”. Paragraph 5 of the guidance sets out considerations when determining whether or not development should be treated as associated development. According to the guidance, associated development should:
- a. have a direct relationship with the principal development. It should support construction or operation of the principal development, or help address its impacts;
 - b. be subordinate to the principal development;
 - c. not only be necessary solely as a source of additional revenue for the applicant in order to cross subsidise the cost of principal development. This does not mean that the applicant cannot cross-subsidise, but if part of a proposal is only necessary as a means of cross-subsidising the principal development then that part should not be treated as associated development; and
 - d. be proportionate to the nature and scale of the principal development.
- 2.2.6 In addition, Paragraph 6 of the guidance sets out that in most cases, associated development should be brought forward alongside the relevant type of principal development.
- 2.2.7 Schedule 1 of the **draft DCO [EN010143/APP/3.1]** sets out the description of the works for which consent is sought. Work No. 1 includes the ground mounted solar PV generating station, including solar panels fitted to mounting structures. It also includes field stations, which comprise the supporting infrastructure of inverters, transformers, and switchgear. Further detail is provided in **Chapter 2: The Scheme, ES Volume 1 [EN010143/APP6.1]**.
- 2.2.8 Work Nos. 2 to 8 describe associated development for which consent is sought and are summarised below:
- a. Work No. 2 – onsite substations and associated works including substations, switch room buildings, and monitoring and control systems, with welfare facilities.
 - b. Work No. 3 – works to lay 132 kilovolt (kV) electrical cables connecting Work No. 2 to the National Grid Drax Substation, including link boxes and works for trenchless crossings. Also includes electrical engineering works within or around National Grid’s Drax Substation to provide the Grid Connection Cable to the Substation, and construction and decommissioning compounds including site and welfare offices and storage areas.
 - c. Work No. 4 – works to lay electrical cables, including but not limited to electrical cables connecting Works No. 1, 2 and 3 to one another, and connecting solar panels to one another and the field stations; landscaping and biodiversity mitigation and enhancement including planting; earthworks; temporary footpath diversions permissive paths; hardstanding and parking; sustainable drainage systems, fencing,

security provision, works to provide access routes, and construction and decommissioning compounds including site and welfare offices and storage areas.

- d. Work No. 5 – construction and decommissioning compounds including areas of hardstanding, car parks, site and welfare offices, security infrastructure, storage areas, site drainage and waste management infrastructure, and electricity, water, waste-water and telecommunications connections.
- e. Work No. 6 – works to develop operations and maintenance buildings including demolition and alteration of existing structures, offices, security and welfare facilities, storage facilities and parking areas.
- f. Work No. 7 – works to facilitate access to Works Nos. 1 to 8, including creation of accesses from the public highway, creation of visibility splays and works to widen and surface the public highway and private means of access.
- g. Work No. 8 – area of habitat management, including landscape and biodiversity enhancement measures, habitat creation and management, construction of drainage infrastructure and access, laying down of internal access tracks and permissive paths, and fencing.

2.2.9 All these works are necessary to support the construction, operation and decommissioning of a solar farm and to address its impacts. They are also subordinate to the principal development under Work No. 1. They are not sources of additional revenue for cross funding purposes and are proportionate to the scale of the development. Therefore, they are all considered as associated development in accordance with the Guidance (Ref. 10) and within the provisions of Section 115(2) of the PA 2008 (Ref. 1).

Legislative and Policy Framework

- 2.2.10 Part 6 of the PA 2008 (Ref. 1) is to be applied when determining an application for a DCO. Sections 103 to 107 of the PA 2008 (Ref. 1) provide the framework for decision making of a DCO application.
- 2.2.11 Under Section 104 of the PA 2008 (Ref. 1), a DCO application must be decided in accordance with relevant NPSs. Currently there is no NPS designated which specifically considers solar generating stations. The Government is currently reviewing and updating the Energy NPSs. The Government published a suite of Draft Energy NPSs for consultation in March 2023 following consultation on earlier drafts in September 2021. These include Draft NPS EN-1 (Ref. 2) which sets out the need for major energy infrastructure, including solar, and Draft NPS EN-3 (Ref. 4), which includes specific policies relating to solar photovoltaic generation. The consultation on the draft energy NPSs closed on 23 June 2023 and no date for their designation has been confirmed beyond the quarter two deadline as set out in the Government's Nationally Significant Infrastructure: Action Plan for Reforms to the Planning Process (Ref. 11), published on 23 February 2023. This predates the March 2023 drafts and extension to the consultation period.
- 2.2.12 It should however be noted that the draft NPSs for Energy published in March 2023 are anticipated to be designated before the end of 2023. As per the transitional arrangements set out by paragraph 1.6.3 of Draft NPS EN-1

(Ref. 2), should designation of new Energy NPSs that include solar generation occur prior to the DCO Application being accepted then the determination of the DCO Application would be under Section 104 of the PA 2008 (Ref. 1).

- 2.2.13 Given the current position regarding the Draft NPSs, Section 105 of the PA 2008 (Ref. 1) is applicable whereby the Secretary of State must have regard to:
- a. any Local Impact Report (Section 105(2)(a) of the PA 2008 (Ref. 1))
 - b. any matters prescribed in relation to development of the descriptions to which the application relates (Section 105(2)(b) of the PA 2008 (Ref. 1))
 - c. any other matters the Secretary of State considers to be important and relevant to a decision (Section 105(2)(c) of the PA 2008 (Ref. 1)).

Local Impact Report

- 2.2.14 East Riding of Yorkshire Council and North Yorkshire Council are the host authorities and will have the opportunity to prepare a Local Impact Report (LIR) following submission of the DCO Application. The LIR will be considered by the Secretary of State in determining the DCO Application. With reference to Section 60 of the PA 2008 (Ref. 1) and the Planning Inspectorate's Advice Note One: Local Impact Reports (Ref. 12), the LIR would also address relevant local planning policies.

Prescribed Matters

- 2.2.15 The prescribed matters referred to in Section 105(2)(b) of the PA 2008 (Ref. 1) are set out in the Infrastructure Planning (Decisions) Regulations 2010 (as amended) (the Decisions Regulations) (Ref. 13). The Decisions Regulations that are of relevance to the Scheme are:
- a. Regulation 3 – Having regard to the desirability of preserving listed buildings, conservation areas and scheduled monuments and their settings where the development would affect these. This is considered in Section 6.11 of this planning statement **Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1]**, and the **Heritage Statement at Appendix C** of this Planning Statement.
 - b. Regulation 7 – Having regard to the United Nations Environmental Programme Convention on Biological Diversity of 1992. This is discussed in Section 6.8 of this planning statement and **Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1]**.

Important and Relevant Matters

- 2.2.16 Both the designated and draft NPSs for renewable energy and electricity networks are considered by the Applicant to be important and relevant to the Secretary of State's decision for the Scheme:
- a. Overarching National Policy Statement for Energy EN-1 (NPS EN-1) (2011) (Ref. 3);
 - b. National Policy Statement for Renewable Energy EN-3 (NPS EN-3) (2011) (Ref. 14);

- c. National Policy Statement for Electricity Networks Infrastructure EN-5 (NPS EN-5) (2011) (Ref. 15).
 - d. Draft Overarching National Policy Statement for Energy (EN-1) (Draft NPS EN-1) (2023) (Ref. 2);
 - e. Draft National Policy Statement for Renewable Energy (EN-3) (Draft NPS EN-3) (2023) (Ref. 4); and
 - f. Draft National Policy Statement for Electricity Networks Infrastructure (EN-5) (Draft NPS EN-5) (2023) (Ref. 16).
- 2.2.17 Paragraph 1.6.2 of Draft NPS EN-1 (Ref. 2) confirms the transitional arrangements whereby if an application is accepted for examination before the new Draft Energy NPSs are designated, those newly designated NPS will not have effect. The transitional provisions in Draft NPS EN-1 (Ref. 2) state that the draft suite of NPS will only have effect once designated in relation to those applications accepted for examination after the date of designation. However, paragraph 1.6.3 goes on to clarify that “...*any emerging draft NPSs (or those designated but not having effect) are potentially capable of being important and relevant considerations in the decision making process.*”
- 2.2.18 If the draft Energy NPSs are designated after acceptance of this Application but before the Secretary of State’s decision, it is anticipated that they will have significant weight in the decision making process given that they reflect and take account of the Government’s latest renewable energy policy, including the British Energy Security Strategy (Ref. 17).
- 2.2.19 In addition, it is considered likely that some parts of the National Planning Policy Framework (NPPF) (Ref. 18) (and associated guidance within the Planning Practice Guidance (PPG) particularly pertaining to heritage and flood risk (Ref. 19)) and the local plans of East Riding of Yorkshire and North Yorkshire Council may be considered as ‘important and relevant’ in accordance with Section 105(2)(c) of the PA 2008 (Ref. 1). The following sections discuss the national and local policy context.

2.3 National Policy Statements

- 2.3.1 Whilst none of the Energy NPSs in force at the time of writing this Planning Statement specifically relate to solar development, this Planning Statement considers the conformity of the Scheme with the NPSs listed below, to the extent that they are likely to be important and relevant to the Secretary of State’s decision.
- a. Overarching National Policy Statement for Energy EN-1 (NPS EN-1) (2011) (Ref. 3);
 - b. National Policy Statement for Renewable Energy EN-3 (NPS EN-3) (2011) (Ref. 14); and
 - c. National Policy Statement for Electricity Networks Infrastructure EN-5 (NPS EN-5) (2011) (Ref. 15).
- 2.3.2 The NPSs for energy were designated in July 2011 and set out matters, principles and impacts that should form the basis of the Secretary of State decision on DCO applications for Energy NSIPs.

- 2.3.3 They were prepared specifically to address the balance of impacts and benefits likely to result from energy projects that are of such a scale that their contribution to meeting government objectives is of national significance. As such, the Applicant considers NPS EN-1, NPS EN-3 and NPS EN-5 to be important and relevant to the determination of the Application, and to form the primary decision-making framework for the Scheme.
- 2.3.4 The Overarching NPS for Energy (NPS EN-1) (Ref. 3) sets out the general principles and impacts to be taken into account for all types of energy NSIP development. It forms the primary basis for determining if development consent should be granted for development in the energy sector. The assessment principles (part 4) and generic impacts (part 5) set out a framework of considerations for energy technologies.
- 2.3.5 NPS EN-3 (Ref. 14) sets out additional policies for renewable energy infrastructure that should be read in addition to the overarching policies set out in NPS EN-1 (Ref. 3).
- 2.3.6 The designated NPS EN-3 (Ref. 14) provides a framework for assessment and technology specific information from specified renewable energy technologies. Solar was not considered technically viable at a scale of more than 50MW at the time of its designation and therefore it is not included in the NPS EN-3 (Ref. 14).
- 2.3.7 NPS EN-5 (Ref. 15) principally covers high voltage long distance transmission and distribution infrastructure but is also covers development which “*constitutes associated development for which consent is sought along with an NSIP such as a generation station...*” (paragraph 1.8.2). NPS EN-5 is considered relevant given the inclusion of inverters, transformers, switchgear, cabling, and substations.

2.4 Draft Revised National Policy Statements

- 2.4.1 The Energy White Paper (December 2020) (Ref. 20) demonstrated a commitment to review the Energy NPSs to ensure that the planning policy framework enables the delivery of infrastructure required for the transition to Net Zero. The Government published a suite of draft Energy NPSs for consultation in March 2023 following consultation on earlier drafts in September 2021. Whilst the Government’s Nationally Significant Infrastructure: Action Plan for Reforms to the Planning Process (February 2023) (Ref. 21) provides that these are to be designated by quarter two of 2023, the consultation on the March 2023 documents closed on 23 June 2023. As discussed above it is not anticipated that these will be designated until the end of quarter four of 2023. Should this occur prior to the DCO Application being accepted then the determination of the DCO Application would be under Section 104 of the PA 2008 (Ref. 1).
- 2.4.2 The draft NPSs reflect up to date targets including the carbon budgets and pathway to achieving net zero in 2050. These include Draft NPS EN-3 (Ref. 4) which includes specific policies for solar photovoltaic generations NSIPS.
- 2.4.3 The Applicant considers the following Draft Energy NPSs to be important and relevant matters in the Secretary of State’s determination of the DCO Application:
- a. Draft Overarching National Policy Statement for Energy (EN-1) (Draft NPS EN-1) (Ref. 2),

- b. Draft National Policy Statement for Renewable Energy (EN-3) (Draft NPS EN-3) (Ref. 4), and
 - c. Draft National Policy Statement for Electricity Networks Infrastructure (EN-5) (Draft NPS EN-5) (Ref. 16).
- 2.4.4 Draft NPS EN-1 (Ref. 2) makes specific reference to solar PV and recognises that there is an urgent need for new electricity generating infrastructure including the role of solar to meet the UK's objectives on energy security, reliability, affordability and decarbonisation. This policy document includes the general principles and impacts to be taken into account for all types of energy NSIP, including solar.
- 2.4.5 Draft NPS EN-3 (Ref. 4) introduces a new section on solar photovoltaic generation (section 3.10). It sets out additional policies for renewable energy infrastructure, including policies specific to the development of solar NSIPs. These include matters that applicants should consider in selecting a site, how assessments should be undertaken and how mitigation should be provided. Draft NPS EN-3 (Ref. 4) should be read in addition to the overarching policies set out in Draft NPS EN-1 (Ref. 2).
- 2.4.6 Draft NPS EN-5 (Ref. 16) recognises that new electricity networks to facilitate energy generation, storage and interconnection infrastructure are vital to achieve net zero. It sets out at paragraph 1.6.3 that it also covers relevant associated development to generation NSIPs.
- 2.4.7 The policies set out in Draft NPS EN-5 (Ref. 16) are additional to those generic impacts set out in Draft NPS EN-1 (Ref. 2) and the two NPS should be considered in tandem when evaluating applications relating to electricity networks infrastructure.

2.5 Other National Policy

National Planning Policy Framework (September 2023)

- 2.5.1 The NPPF (Ref. 18) was updated in 2023 and sets out the Government's planning policies for England and is a material planning consideration in the determination of planning applications under the Town and Country Planning Act 1990 (TCPA 1990).
- 2.5.2 Paragraph 5 makes it clear that the NPPF does not contain specific policies for NSIPs and that applications in relation to NSIPs are to be determined in accordance with the decision-making framework set out in the PA 2008 and relevant NPSs. On this basis the NPPF is considered to be generally of less relevance to the Secretary of State's decision than the relevant Energy NPSs and Draft Energy NPSs.
- 2.5.3 The NPPF is however supported by the National Planning Practice Guidance (NPPG) (Ref. 19) and Draft NPS EN-1 (Ref. 2) does include footnote references to the National Planning Practice Guidance (NPPG). Therefore, reference to the NPPF and NPPG is only made in respect of relevant matters within Section 6 of this Planning Statement.

UK Marine Policy Statement (March 2011)

- 2.5.4 The Scheme will cross the River Ouse as shown by the Grid Connection Corridor illustrated as Work No.3 on sheet 21 of the **Works Plan**

[EN010143/APP/2.3]. The works will involve cabling being laid underneath the riverbed using Horizontal Directional Drilling (HDD). The River Ouse is tidal in this area and a deemed Marine Licence is therefore sought for these works (to the extent any relevant exemption does not apply). This deemed Marine Licence is included in the draft DCO and therefore the Marine Policy Statement (MPS) (Ref. 22) is a relevant policy document for the small section of the Grid Connection Corridor under the River Ouse.

- 2.5.5 The MPS (Ref. 22) is the framework for preparing Marine Plans and taking decisions affecting the marine environment. It contributes to the achievement of sustainable development in the United Kingdom marine area. It has been prepared and adopted for the purposes of section 44 of the Marine and Coastal Access Act 2009 (Ref. 23). The Marine and Coastal Access Act 2009 requires all public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area to do so in accordance with the MPS unless relevant considerations indicate otherwise. The relevant sections of the MPS include section 3.3 Energy production and infrastructure development, which states that: *“When decision makers are examining and determining applications for energy infrastructure and marine plan authorities are developing Marine Plans they should take into account: The national level of need for energy infrastructure, as set out in the Overarching National Policy Statement for Energy (EN-1) which applies in England and Wales...”*.
- 2.5.6 It states that marine plan authorities will need to liaise, as appropriate, with terrestrial planning authorities to ensure the development of any necessary onshore infrastructure. This includes sub-stations, to support offshore electricity generation and connection to the national grid.
- 2.5.7 The MPS also states that the marine planning process should be flexible in responding to emerging evidence about the impacts of new technologies in relation to renewables.

2.6 Local Policy

- 2.6.1 Policies in Local Plans are frequently considered important and relevant matters and can influence the content of local impact reports (which the host local authorities will prepare following submission of the DCO Application), and which the Secretary of State will have regard to in its decision making in accordance with the PA 2008 (Ref. 1).

Adopted Planning Policy

- 2.6.2 The Scheme lies within the administrative areas of East Riding of Yorkshire Council and the recently formed Unitary Authority of North Yorkshire Council. North Yorkshire Council was formed on 1 April 2023 by the merger of the administrative areas of North Yorkshire County Council and its six constituent District Councils. Prior to the merger and the formation of the Unitary Authority the Scheme was located in the administrative areas of Selby District Council and North Yorkshire County Council. It is expected that over time a new Local Plan for North Yorkshire Council will be prepared, however this is not currently available, and it is anticipated that this will not be in place (either adopted or at draft review stage) within the timescale of determination of the DCO Application. Consequently, the planning policy for Selby District Council and North Yorkshire County Council, as described

below, along with that for the East Riding of Yorkshire Council will continue to be the relevant local planning policy for the Scheme.

- 2.6.3 The following documents form the Development Plan for the land within which the Scheme is located:

East Riding of Yorkshire Council

- a. East Riding Local Plan (adopted April 2016) (Ref. 24);
- b. East Riding Local Plan Allocations Document 2012–2029 (adopted July 2016) (Ref. 24);
- c. East Riding and Hull Joint Waste Plan (Adopted November 2004) (Ref. 26)
- d. East Riding and Hull Joint Minerals Plan (Adopted November 2019) (Ref. 27);

North Yorkshire Council

- a. Selby District Core Strategy Local Plan (Adopted October 2013) (Ref. 28);
- b. Selby District Local Plan (Adopted February 2005) – saved policies (Ref. 29); and
- c. City of York Council, North York Moors National Park Authority and North Yorkshire County Council Minerals and Waste Local Plan (Adopted April 2022) (Ref. 30).

Neighbourhood Plans

- 2.6.4 Within the administrative areas of East Riding of Yorkshire Council and North Yorkshire Council there are no neighbourhood plans (which form part of the Development Plan) that have been made which are of relevance or in close proximity to the Scheme. In 2017, Howden Parish Council designated its parish as a neighbourhood area with the purpose of preparing a neighbourhood plan. At the time of writing, however, it has not published any draft plans for consultation.

Supplementary Planning Documents

- 2.6.5 East Riding of Yorkshire Council has produced a Flood Risk Sequential Test and Exception Test supplementary planning document (SPD) (adopted November 2021) (Ref. 31) which expands on their policies in the Local Plan and provides guidance on how to apply local and national policy using the council's Strategic Flood Risk Assessment.
- 2.6.6 East Riding of Yorkshire Council has also produced a Lower Derwent Valley SPD (Ref. 62); which provides applicants and planning officers with guidance on preparing and determining planning applications in the Lower Derwent Valley.

Emerging Planning Policy

- 2.6.7 Under regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) (Ref. 32) local planning authorities must review local plans at least once every 5 years from their adoption date to ensure that policies remain relevant and effectively address the needs of the local community. This is also mirrored in the NPPF.

- 2.6.8 It is well established that where an adopted Local Plan is out of date, or emerging planning policy is at an advanced stage and is considered important and relevant, emerging planning policy can be a material consideration in the determination of planning applications and, in appropriate circumstances, can outweigh the provisions of an adopted plan.
- 2.6.9 The adopted East Riding Local Plan (Ref. 24) was reviewed within five years of its adoption. The review found that an update to the plan was required due to changes to national policy; issues identified in the inspector's report on the Local Plan Examination; and the monitoring of current policies and updates to the evidence base of the Plan. As such, East Riding of Yorkshire Council has prepared a Local Plan Update 2020–2039 (Ref. 33) and consulted on the proposed changes between October and December 2022. They submitted their Local Plan Update to the Planning Inspectorate for examination on 31 March 2023. The examination hearings commenced on 31 October 2023. Given the advanced stage of the emerging East Riding Local Plan Update this may be considered important and relevant.
- 2.6.10 In addition, prior to the formation of North Yorkshire Council, Selby District Council were producing a new Local Plan. The new Local Plan was expected to replace the Selby District Core Strategy Document which was adopted in 2013 and the 'saved' policies from the adopted Selby District Local Plan. The new Local Plan Publication Version Consultation 2022 (Ref. 34) was published in August 2022. It was due to be submitted to the Planning Inspectorate in early 2023 according to Selby's Local Development Scheme, with its adoption anticipated in March 2024. Submission of this emerging Local Plan has not however occurred. North Yorkshire Council is now preparing a new Local Plan which it is required to prepare by 1 April 2028 however a detailed timetable for this is yet to be published. Given the advanced stage the emerging Selby Local Plan Publication Version 2022 reached this may be considered important and relevant.
- 2.6.11 A review of the East Riding and Hull Joint Waste Plan has also commenced, with the evidence base of current sites and projected need currently being developed to inform the Preferred Approach (to the development of an updated plan). A draft of the updated plan is therefore not yet available.
- 2.6.12 The relevant policies within these emerging plans are provided at **Appendix B**, as they may be considered important and relevant.

2.7 Other Relevant Legislation and Policy Considered to be Important and Relevant

- 2.7.1 There are other national legislation and policy documents relating to the energy sector and climate change. Some of these are discussed in more detail within the **Statement of Need [EN010143/APP/7.1]**, and include the following:
- a. The Energy Act (October 2023) (Ref. 35);
 - b. Progress Report to Parliament Climate Change Committee 2023 (Ref. 36);
 - c. Powering Up Britain (March 2023) (Ref. 37);
 - d. Environmental Improvement Plan 2023 (Ref. 38);

- e. British Energy Security Strategy (2022) (Ref. 17);
- f. Mission Zero – the Skidmore Review (January 2023) (Ref. 39);
- g. Net Zero Strategy: Building Back Greener 2021 (Ref. 40);
- h. The Environment Act 2021 (Ref. 41);
- i. Net Zero: Opportunities for the Power Sector (2020) (Ref. 42);
- j. Energy White Paper: Powering our Net Zero Future (2020) (Ref. 20);
- k. National Infrastructure Strategy (2020) (Ref. 43);
- l. The Climate Change Act 2008 (Ref. 44) and the Climate Change Act 2008 (2050 Target Amendment) Order 2019 (Ref. 45).

2.8 Pre-Application Consultation

2.8.1 Sections 42 and 47 of the PA 2008 (Ref. 1) requires applicants for DCO to carry out formal (statutory) pre-application consultation on their proposals. There are several requirements on how this consultation must be undertaken that are set out in the PA 2008 (Ref. 1) and related regulations.

2.8.2 The Applicant has undertaken extensive consultation throughout the development of the Scheme. This is described in the **Consultation Report [EN010143/APP/5.1]** and its supporting appendices **[EN010143/APP/5.2]**, and includes the stages listed below:

- a. EIA Scoping Consultation – EIA Scoping Report was submitted to the Planning Inspectorate on 9 September 2022 and a Scoping Opinion was received 20 October 2022 including formal responses received by the Planning Inspectorate from consultees.
- b. Non-Statutory Consultation – an initial round of non-statutory public consultation which ran for a period of four weeks between 3 and 30 October 2022. Feedback was sought on early proposals for the Scheme, the approach to EIA, and the Applicant’s approach to consultation. The consultation took place both online and through in-person events.
- c. Public Statutory Consultation – statutory consultation held between 9 May and 20 June 2023. This provided information to the local community, affected stakeholders and anyone with an interest in the Scheme and gave them an opportunity to comment on the proposals at this stage. This included consultation on the preliminary environmental information. The consultation took place both online and through in-person events.
- d. Targeted consultation – following the review of feedback from the statutory consultation and further design development and assessment work, a number of minor changes to the Order limits for the Scheme were identified primarily to accommodate additional land for access. A targeted consultation with affected section 42 consultees was therefore undertaken from 1 September until 2 October 2023.
- e. Ongoing consultation during all these stages with:
 - i. East Riding of Yorkshire Council;

- ii. North Yorkshire Council (and Selby District Council and North Yorkshire County Council prior to 1 April 2023);
- iii. Natural England;
- iv. Environment Agency;
- v. Historic England;
- vi. Planning Inspectorate;
- vii. Landowners; and
- viii. Local Residents.

2.8.3 The Applicant has had regard to all feedback it has received in response to its consultations when developing the Scheme. This is described in the **Consultation Report [EN010143/APP/5.1]** and the **Consultation Report Appendices [EN010143/APP/5.2]**.

2.9 Additional Consents

- 2.9.1 A DCO, if granted, has the effect of providing consent for development in addition to a range of other consents and licences where specified as well as removing the need for some consents such as planning permission. Details of the consents and licences included in the **draft DCO [EN010143/APP/3.1]** are explained in the **Explanatory Memorandum to the Draft DCO [EN010143/APP/3.2]** and the **Consents and Agreements Position Statement [EN010143/APP/3.3]**. The latter also explains the likely consents being sought outside of the DCO process.
- 2.9.2 The **draft DCO [EN010143/APP/3.1]** also includes a deemed Marine Licence, which is required for the grid connection works where they interact with the River Ouse (which is tidal in the area which overlaps with the Order limits). The Marine Management Organisation has been consulted on the Scheme including during statutory consultation as well as on the intention to include a deemed Marine Licence in the **draft DCO [EN010143/APP/3.1]**.

3. The Order Limits and Surrounding Context

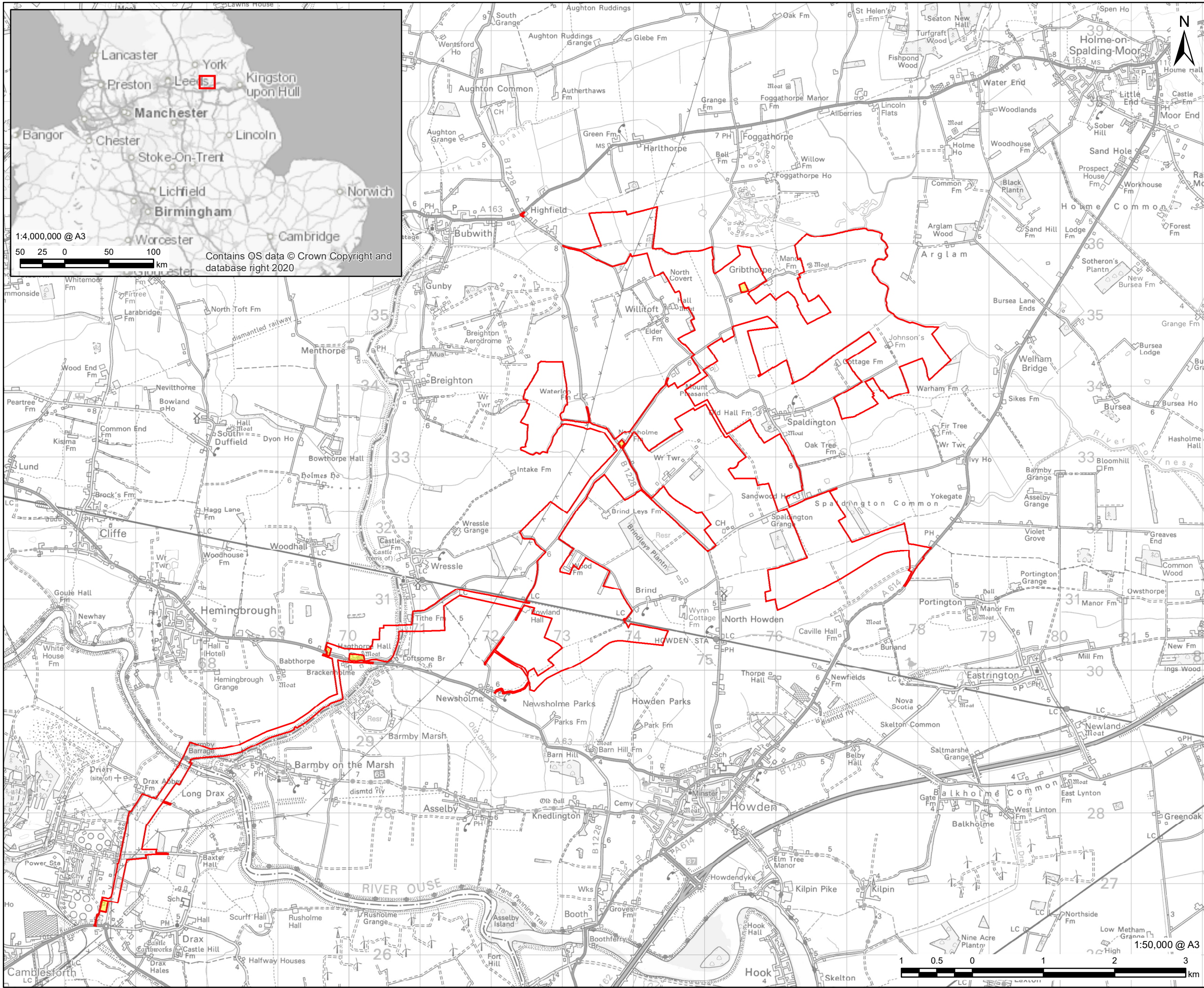
3.1 Introduction

- 3.1.1 The Order limits comprise approximately 1,276 hectares (ha) of land and are shown on **Figure 3-1**. This includes the Solar PV Site, the Ecology Mitigation Area, the Interconnecting Cable Corridor, the Grid Connection Corridor, and Site Accesses (also collectively referred to as “the Site”).
- 3.1.2 The Solar PV Site, Ecology Mitigation Area, Interconnecting Cable Corridors, and associated Site Accesses are situated within the administrative area of East Riding of Yorkshire Council. The Grid Connection Corridor and associated Site Accesses are partially within the administrative area of East Riding of Yorkshire Council but largely within the administrative area of North Yorkshire Council. These elements are shown on **Figure 3-2** below.
- 3.1.3 The Solar PV Site is the area covered by all the Solar PV Areas. The Solar PV Areas are 16 areas of land within which solar PV panels and associated solar PV infrastructure, including two Grid Connection Substations and areas of habitat creation/enhancement and landscaping, are to be located. The Ecology Mitigation Area is an area of land in the north-east of the Site to be managed to provide habitat for overwintering and migratory bird species. The Interconnecting Cable Corridor is the area outside of the Solar PV Site and Grid Connection Corridor within which the low voltage Interconnecting Cables, linking the Solar PV Areas to each other and to the Grid Connection Substations, will be installed. The Grid Connection Corridor is the area outside of the Solar PV Site within which the 132 kilovolt Grid Connection Cables will be installed. The Grid Connection Corridor is also within the Solar PV Site and other land between Solar PV Areas 1c and 3b which is shown as Work No. 3 on the **Works Plan [EN010143/APP/2.3]**. Land required to facilitate access to the elements of the Site, referred to as the Site Accesses, is also included in the Order limits.
- 3.1.4 The following sections describe the existing and surrounding context of the Solar PV Site, Ecology Mitigation Area, Interconnecting Cable Corridor, and associated Site Accesses, as well as the Grid Connection Corridor and associated Site Accesses, before describing environmental designations that are within and surrounding the Order limits. Other environmental and planning considerations within and surrounding the Order limits are also discussed.

3.2 Solar PV Site, Ecology Mitigation Area, Interconnecting Cable Corridor and associated Site Accesses

Existing Context

- 3.2.1 The Solar PV Site comprises 16 Solar PV Areas totalling approximately 966 ha. For clarity of reporting, individual Solar PV Areas have been assigned an identification number (Solar PV Areas 1a, 2a–g and 3a–c), as shown on **Figure 3-2**.



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LEGEND
 Order limits
 Land not included in the Order limits

NOTES
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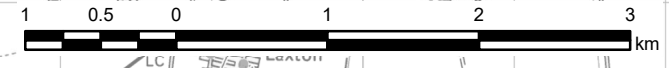
ISSUE PURPOSE
Planning Statement

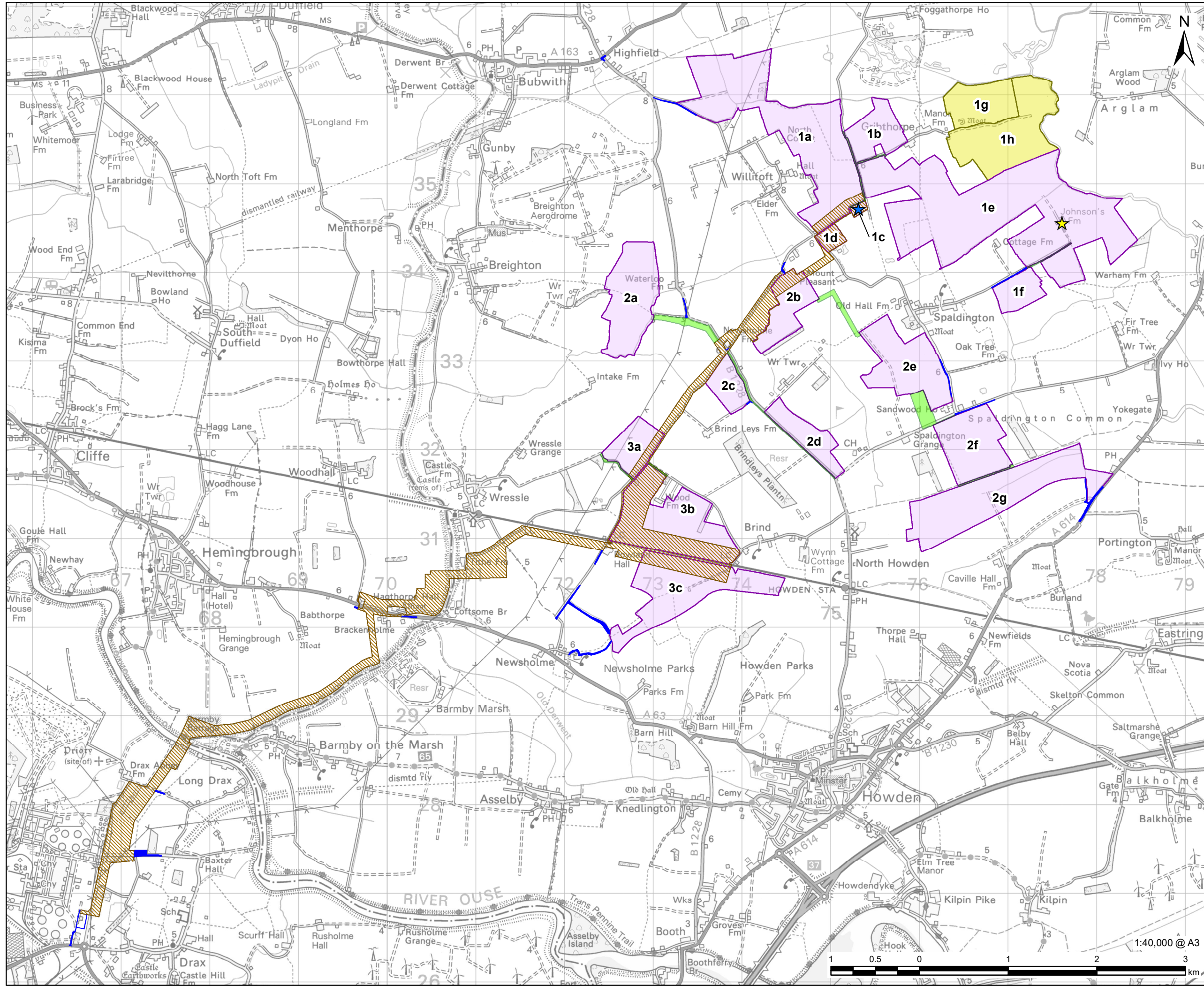
PROJECT NUMBER
60683115

FIGURE TITLE
Scheme Location

FIGURE NUMBER
Figure 3-1

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- LEGEND**
- Solar PV Site (xx = Solar PV Area)
 - Ecology Mitigation Area (xx = Ecology Mitigation Area)
 - Grid Connection Corridor
 - Interconnecting Cable Corridor
 - Site Access
 - 33kV/132kV Grid Connection Substations
 - Location of Operations and Maintenance Hub (Johnson's Farm)

NOTES
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ISSUE PURPOSE
Planning Statement

PROJECT NUMBER
60683115

FIGURE TITLE
Elements of the Site

FIGURE NUMBER
Figure 3-2

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- 3.2.2 The Solar PV Site, Ecology Mitigation Area, and Interconnecting Cable Corridor predominately comprise agricultural fields. These are mainly under arable production, with some areas of pasture, interspersed with individual trees, hedgerows, tree belts (linear) small woodland blocks and farm access tracks. Drainage ditches, notably Fleet Dike and Londesborough Drain, and small watercourses are ubiquitous across the area and are generally heavily modified or artificial in nature as a result of the surrounding agricultural and drainage practices. Fields containing willow coppice used for biomass production are located in the southern part of the Solar PV Area 3c. These will be harvested by the landowner prior to the operation of the Scheme.
- 3.2.3 Within the eastern extent of the Solar PV Site (Solar PV Area 1e), there are existing buildings around a courtyard, which is accessed via a farm track off the eastern extent of Ings Lane, east of Spaldington, which are locally known as Johnson's Farm. These buildings consist of what appears to be a dilapidated residential building and a single storey barn type building immediately adjoining the access to the north. To the north-east of the dilapidated dwelling is a modern agricultural building currently used for storage.
- 3.2.4 Other existing infrastructure within the Solar PV Site includes overhead power lines carried by pylons which extend from Drax Power Station and cross Solar PV Areas 1a and 3a.
- 3.2.5 The Ecology Mitigation Area is located in the north-east of the Site, to the east of the hamlet of Gribthorpe, (see **Figure 3-2**). An access track forms the boundary between Ecology Mitigation Area 1g and 1h.
- 3.2.6 The Site Accesses are areas of land predominantly along or adjacent to the public highway however outside of the public highway; these generally follow the line of existing farm accesses. The location of the Site Accesses in relation to the Solar PV Site, Ecology Mitigation Area, and Interconnecting Cable Corridor are shown on **Figure 3-2. Part of the Hull to Selby Railway** line lies within the Order limits separating Solar PV areas 3b and 3c.

Surrounding Context

- 3.2.7 Several small rural villages and hamlets including Gribthorpe, Willitof, Spaldington, Brind and Wressle and the market town of Howden are located in the surrounding area of the Order limits. At the closest point, the boundary of the Solar PV Site is located 1.6 kilometres (km) north-west of new residential developments in the north of Howden and approximately 1.3 km west of the villages of Brighton and Wressle. The closest residential properties in the hamlets of Gribthorpe and Brind and the village of Spaldington are approximately 20 metres (m) from the Solar PV Site, whilst the closest properties in the hamlet of Willitof are approximately 120 m away. The village of Newsholme is located adjacent to the south of the Solar PV Site.
- 3.2.8 A National Grid Gas transmission pipeline is located 140 m from the southern boundary of Solar PV Area 2g and 60 m from the southern boundary of Solar PV Area 3c. To the south of Solar PV Area 2b and between Solar PV Areas 2d and 2e, there is an existing wind farm and anaerobic digestion plant. The windfarm is located on the former Spaldington Airfield and has five 2.3 MW turbines. An anaerobic digestion plant is located within the farm unit.

- 3.2.9 Fishing lakes are sited to the north-east of Solar PV Areas 1a and 1b. At the southernmost lake, closest to the Solar PV Site, there are also six holiday homes. Other recreational facilities in the vicinity of the Solar PV Site include the 18-hole Boothferry Golf Club located between Solar PV Areas 2d and 2e off Spaldington Lane. Brighton Airfield is to the west of Solar PV Area 1a and north-west of Solar PV Area 2a. This houses the Real Aeroplane Company and the Real Aeroplane Club's collection of unusual, classic and ex-military aircraft. The Real Aeroplane Club has a single grass runway and is open to members and flying visitors throughout the year.
- 3.2.10 The eastern boundary of the Ecology Mitigation Area is formed by the River Foulness and further east are residential properties in the hamlet of Arglam which lies beyond the river (approximately 315 m east of the Order limits at the closest point).
- 3.2.11 The local transport network close to the Site comprises several strategic connections including the M62 that connects Liverpool to Hull via Bradford, Leeds and Wakefield, the A63 which travels between Hull in the east to Leeds in the west via Selby and the A614 which is a single carriageway road running to the east of the Scheme close to Solar PV Area 2g. There are several other smaller B roads and lanes adjacent to and within the Solar PV Site, Ecology Mitigation Area and Interconnecting Cable Corridor.

3.3 The Grid Connection Corridor and Associated Site Accesses

Existing Context

- 3.3.1 The Grid Connection Corridor is located north to south between Solar PV Area 1c and Solar PV Area 3c and then runs south-west of the Solar PV Site (as shown in **Figure 3-2**). It connects to the National Grid Drax Substation which is located approximately 6.2 km south-west of the southern extent of the Solar PV Site.
- 3.3.2 The landscape features within the Grid Connection Corridor consist predominately of agricultural fields mainly under arable production, with some areas of pasture, interspersed with individual trees, hedgerows, tree belts small woodland blocks and farm access tracks. The Grid Connection Corridor crosses the River Derwent 2.9 km north-east of the village of Long Drax, and the River Ouse approximately 290 m west of the village of Long Drax. Drainage ditches and small watercourses are ubiquitous across the area and are generally heavily modified or artificial in nature as a result of the surrounding agricultural and drainage practices.
- 3.3.3 The Grid Connection Corridor also includes several roads and roadside verges. As shown in **Figure 2-4, ES Volume 3 [EN010143/APP/6.3]**, the Hull to Selby Railway lies within the Grid Connection Corridor.

Surrounding Context

- 3.3.4 The Grid Connection Corridor passes approximately 170 m south of Wressle at the closest point. It is adjacent to Hagthorpe Hall and Brackenholme Cottages at the hamlet of Brackenholme. The village of Hemingbrough is approximately 1.1 km north of the Grid Connection Corridor and the village of Barmby on the Marsh is approximately 80 m south of the Corridor (across

the River Derwent) at the closest points. The Grid Connection Corridor is approximately 400 m north/north-west of the village of Drax. Loftsme Bridge Hotel is located approximately 160 m east and Yorkshire Water's Loftsme Bridge Water Treatment Works is located approximately 100m south east, both east of the River Derwent.

- 3.3.5 Drax Power Station and the National Grid Drax Substation complex are located to the west. Drax Power Station is a former coal fired power station which now produces 14 terawatt-hours (TWh) of renewable energy a year from biomass sources.

3.4 Designations and Allocations

Within the Order limits

- 3.4.1 **Figure 3-3** below shows the environmental and planning constraints within and surrounding the Order limits.
- 3.4.2 The Solar PV Site and Ecology Mitigation Area do not contain any statutory or non-statutory nature conservation designations.
- 3.4.3 The Grid Connection Corridor and associated Site Accesses cross and lie adjacent to the nationally and internationally designated River Derwent Scientific Interest (SSSI) and Special Area of Conservation (SAC). The Grid Connection Corridor intersects with the northern part of the SAC/SSSI to the east of Babthorpe as further described in **Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1]**.
- 3.4.4 There are two non-statutory Local Wildlife Sites (LWS) within the Interconnecting Cable Corridor (Wressle Verge LWS and Tottering Lane, Gribthorpe LWS). Tottering Lane, Gribthorpe LWS is approximately 1.5 km in length, and partially lies within the Interconnecting Cable Corridor between Solar PV Area 1a and Solar PV Areas 1b and 1e. Wressle Verge LWS is 3.3 km in length and partially lies within the Interconnecting Cable Corridor and Grid Connection Corridor between Solar PV Areas 3a and 3b, running south-east to north-west along both sides of Brind Lane and then south-west along both sides of Wood Lane. Further information regarding these LWS is provided in **Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1]**.
- 3.4.5 There are no national or local landscape designations within the Order limits.
- 3.4.6 There are no designated heritage assets such as World Heritage Sites, Registered Battlefields, Registered Parks and Gardens, or Protected Wrecks Scheduled Monuments, Listed Buildings and Conservation Areas within the Order limits.
- 3.4.7 There are no allocations for residential development, employment development or for minerals and waste development within the Solar PV Site, Ecology Mitigation Area, Interconnecting Cable Corridor, Grid Connection Corridor or associated Site Accesses.

The Surrounding Area

- 3.4.8 There are nine international statutory sites for nature conservation (i.e., SACs, Special Protection Areas (SPAs) and Ramsar sites) outside of the Order limits, but within 10 km of the Order limits. These include:

- a. Lower Derwent Valley SAC – approximately 1.30 km north-west of the Order limits.
 - b. Lower Derwent Valley Ramsar – approximately 1.30 km north-west of the Order limits.
 - c. Lower Derwent Valley SPA – approximately 1.30 km north-west of the Order limits.
 - d. Humber Estuary SAC – approximately 3.42 km south of the Order limits.
 - e. Humber Estuary SPA – approximately 3.42 km south of the Order limits.
 - f. Humber Estuary Ramsar – approximately 3.42 km south of the Order limits.
 - g. Skipwith Common SAC – approximately 5.56 km south of the Order limits.
 - h. Thorne and Hatfield Moors SPA – approximately 9.24 km south of the Order limits.
 - i. Thorne Moor SAC – approximately 9.24 km south of the Order limits.
- 3.4.9 No SACs designated for bats are identified within 30 km of the Order limits and no proposed Ramsar sites, possible SACs, or potential SPAs are present within 10 km.
- 3.4.10 There are nine other statutory designated sites for nature conservation (national designations: SSSIs, National Nature Reserves (NNRs), Local Nature Reserves (LNRs)) outside of the Order limits, but within 10 km of the Scheme. These are:
- a. Barn Hill Meadows SSSI – approximately 1.01 km south of the Order limits.
 - b. Eastrington Ponds LNR – approximately 1.17 km south-east of the Order limits.
 - c. Howden Marsh LNR – approximately 1.70 km south-east of the Order limits.
 - d. Brighton Meadows SSSI – approximately 1.30 km north-west of the Order limits.
 - e. Lower Derwent Valley NNR – approximately 1.47 km north-west of the Order limits.
 - f. Derwent Ings SSSI – approximately 1.47 km north-west of the Order limits.
 - g. Eskamhorn Meadows SSSI – approximately 2.42 km south of the Order limits.
 - h. Humber Estuary SSSI – approximately 3.43 km south of the Order limits.
 - i. Barlow Common LNR – approximately 3.45 km north-west of the Order limits.
- 3.4.11 The locations of these statutory sites, relevant to the Order limits, are shown in **Figure 8-1, ES Volume 3 [EN010143/APP/6.3]**,

- 3.4.12 There are 11 non-statutory sites designated for nature conservation identified outside of the Order limits, but within 2 km of the Scheme.
- 3.4.13 The locally designated Lower Derwent Valley and Pocklington Canal Important Landscape Area (ILA) within East Riding of Yorkshire Council's administrative area and the Derwent Valley Candidate Locally Important Landscape Area (LILA) within the administrative area of North Yorkshire Council are located to the west of the Grid Connection Corridor. The Yorkshire Wolds ILA within East Riding of Yorkshire is within 10 km of the Scheme's boundary to the east.
- 3.4.14 There are 126 designated heritage assets comprising seven scheduled monuments, 118 listed buildings, and one conservation area, namely Howden, within 3 km from the boundary of the Solar PV Site. These are discussed in more detail in **Appendix 7-2: Cultural Heritage Desk-Based Assessment, ES Volume 2 [EN010143/APP/6.2]**. Of note are:
- a. Grade II listed Hagthorpe Hall (1148458) – approximately 60 m north of the Grid Connection Corridor.
 - b. Grade II listed Hagthorpe stables – approximately 60 m north of the Grid Connection Corridor.
 - c. Grade II listed Derwent View (1168001) – approximately 65 m south of the Grid Connection Corridor.
 - d. Grade II listed Rowland Hall (1083172) – approximately 90 m south of Solar PV Area 3b.
 - e. Grade II listed building Home Farmhouse in Spaldington (1083169) – located approximately 550 m to the west of Solar PV Site 2e.
 - f. Drax Augustinian Priory scheduled monument (1016857) – approximately 70 m west of the Grid Connection Corridor.
 - g. Wressle Castle (NHLE 1005210) is a Grade I listed building (NHLE 1083170) and the centre point of a wider scheduled monument (NHLE 1005210) – approximately 800 m north-west of the Grid Connection Corridor.
- 3.4.15 There are no areas of ancient woodland within 2 km of the Order limits. There are however a total of 204 trees that are identified as likely veteran, with seven of those being ancient trees within the Order limits as shown by **Annex A Tree Constraints Plan** in the **Arboricultural Impact Assessment and Tree Protection Report (Appendix 10-5, ES Volume 2 [EN010143/APP/6.2])**.
- 3.4.16 The East Riding Local Plan Update (Ref. 31) identifies a number mixed use and residential allocations in proximity to the Order limits. Of note is HOW-G which consists of 119 ha of land to the west of Thorpe Road allocated to mixed use development, located approximately 420 m south of Solar PV Area 2g. A hybrid planning application (planning application reference 22/02118/STPLFE) comprising an access road and mixed use development was submitted for this site in 2022 and is pending determination.
- 3.4.17 Allocations in the East Riding of Yorkshire Site Allocations Document 2016 (Ref. 25) include residential allocations around Howden – HOW-A which is 26.69 ha of land north of Shelford Avenue in Howden; HOW-B which is 1.1 ha of land, to the west of Thorpe Road; and HOW-C which is 0.72ha of land

west of A614. There is also 3.67 ha of land allocated for residential development around Bubwith across five sites referred to as BUB A-E.

3.5 Other Environmental and Planning Considerations

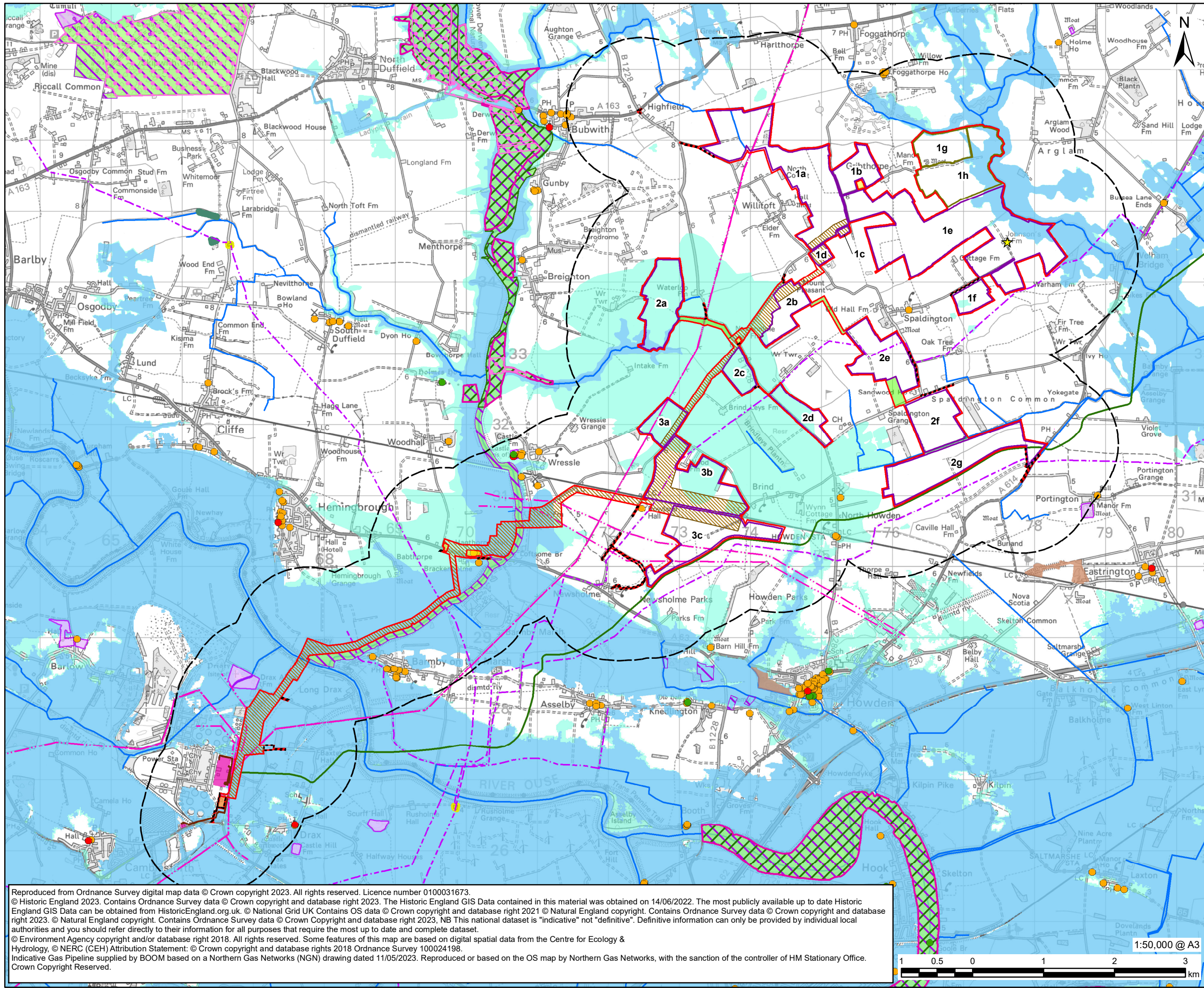
- 3.5.1 As stated in **Chapter 8: Ecology, ES volume 1 [EN010143/APP/6.1]** and shown on **Figure 8-2, ES Volume 3 [EN010143/APP/6.3]** Priority coastal and floodplain grazing marsh habitat is located immediately adjacent to the Solar PV Site, slightly encroaching into Solar PV Area 2b. An area of Priority coastal and floodplain grazing marsh habitat is also within the Grid Connection Corridor, in a field adjacent to Solar PV Area 2b, along the verges of Wood Lane, and inside a field to the west of Wood Lane. A single area of Priority deciduous woodland habitat is located within Solar PV Area 3b, other areas of Priority deciduous woodland are present adjacent to the Solar PV Site. Three areas of Priority deciduous woodland habitat are also present within the Grid Connection Corridor, close to National Grid's Drax Substation. Areas of Priority orchard habitat is located adjacent to the Grid Connection Corridor, to the north-west of the A63 and also to the east of Solar PV Area 3b (as shown on **Figure 8-2, ES Volume 3 [EN010143/APP/6.3]**).
- 3.5.2 With regard to landscape character, at the national level, the Solar PV Site, Ecology Mitigation Area, Interconnecting Cable Corridor, Grid Connection Corridor and Site Accesses are within the Natural England's National Character Area 39: Humberhead Levels (NCA 39) (Ref. 46). At a regional level, the Grid Connection Corridor is within character areas Levels Farmland (22) and River Floodplain (24) of the North Yorkshire and York Landscape Characterisation Project (Ref. 47).
- 3.5.3 At a local level, The Solar PV Site is within Landscape Character Area 5 (Ouse Valley) as defined by the Selby Landscape Character Assessment (Ref. 47), as well as Landscape Character Types LCT 5 Open Farmland and LCA 7 Foulness Open Farmland of the East Riding of Yorkshire Landscape Character Assessment (Ref. 49). The LCT 5 is further broken down to LCA 5A Howden to Bubwith Farmland; and LCA 5B West of Holme on Spalding Moor Farmland; and LCT 7 Foulness Open Farmland is further broken down to LCA 7A South of Holme on Spalding Moor Farmland; and LCA 7B Eastrington Farmland.
- 3.5.4 Within the North Yorkshire Council administrative area, the Grid Connection Corridor is within character areas Ouse Valley (LCA 5), Derwent Valley (LCA 6) and Camblesforth Farmland (LCA 15) (Ref. 47).
- 3.5.5 The key characteristics of these Landscape Character Areas are defined within **Chapter 10: Landscape and Visual Amenity, ES Volume 1 [EN010143/APP/6.1]** and illustrated on **Figure 10-3, ES Volume 3 [EN010143/APP/6.3]**. In summary these are generally described as being flat and low-lying land or flood plain, with large scale open and rectilinear arable fields. Dykes and ditches define field boundaries, and there is a general absence of hedgerows. The River Foulness defines the eastern boundary of the Solar PV Site.
- 3.5.6 **Table 15-15 of Chapter 15: Soils and Agricultural Land, ES Volume 1 [EN010143/APP/6.1]** sets out the percentage (%) of agricultural land within the Order limits, based on reconnaissance soil surveys undertaken in

November 2022 to January 2023; a more detailed investigation between May 2023 and September 2023; and Predictive Agricultural Land Classification (ALC) mapping data commissioned by Cranfield University. It states that 0.8 % of the land is Grade 4, 86.7 % is Subgrade 3b, 7.2 % is Subgrade 3a, 0.8 % is Grade 2 and 3.8 % is Grade 1. It should be noted that the majority of Grade 1, 2 and 3a land is within the Grid Connection Corridor, which will be reinstated to agricultural use after construction. Local farmers have confirmed the land is used principally for wheat production and that the land is of poor quality in wet conditions.

- 3.5.7 The majority of land within the Solar PV Site is moderate quality Subgrade 3b. There are small areas of subgrade 3a within Solar PV areas 1a, 1g, 1h, 2f, 2g, 3b and 3c, and a small area of Grade 2 and land in Solar PV Areas 2g and 3c. The majority of agricultural land within the Solar PV Site is therefore not Best and Most Versatile (BMV) land as shown on **Figure 3-4**.
- 3.5.8 For the section of the Grid Connection Corridor which runs south west of the southern extent of the Solar PV Site, the northern part of the Grid Connection Corridor is predominantly Subgrade 3b with patches of Grade 2; the middle section of the Grid Connection Corridor associated with the Rivers Derwent and Ouse is a combination of Grades 1, 2 and Subgrade 3a BMV land, and the southern section of the Grid Connection Corridor around Drax is predominantly Subgrade 3b with some Grade 2.
- 3.5.9 There are 52 records of non-designated sites of historical or archaeological interest within the Order limits, although some of this number represent spot evidence and sites of former buildings as well as historic landscape features and duplicate entries for the same heritage asset. There is a non-designated moated site (MHU3206) located in the south-west corner of Ecology Mitigation Area 1g. There is also a non-designated heritage asset of schedulable quality – Hagthorpe moated site (MNY10603) – which may extend to within the Grid Connection Corridor; further details of this are set out in the **Heritage Statement at Appendix C** of this Planning Statement. Further details of both non-designated assets are also provided in **Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1]** and **Appendix 7-2: Cultural Heritage Desk-Based Assessment, ES Volume 2 [EN010143/APP/6.2]**.
- 3.5.10 From published Environment Agency flood mapping (Ref. 50), the majority of the Solar PV Site is located within Flood Zone 1 (lowest risk of flooding). Areas of Flood Zone 2 (medium risk) are predominantly located within the central area of the Solar PV Site within Solar PV Areas 2a, 2c, 2d, 3a and 3b. Limited areas of Flood Zone 3 (high risk) are found in relation to the River Foulness to the north-east of the Solar PV Site (Solar PV Areas 1e) and in relation to Fleet Dyke to the west of the Solar PV Site (Solar PV Area 2a).
- 3.5.11 The parts of Ecology Mitigation Area 1h in closest proximity to the River Foulness are within areas of Flood Zone 2 and Flood Zone 3 as illustrated in **Figure 3-3**. The Interconnecting Cable Corridor between the Solar PV Areas 2a, 2c and 2d are within Flood Zone 2.
- 3.5.12 The northern section of the Grid Connection Corridor is located mainly within Flood Zone 1 and Flood Zone 2, with the Flood Zone 2 area coincident with the central areas of the Solar PV Site (see **Figure 3-3**). The southern section of the Grid Connection Corridor is predominantly in Flood Zone 3

(associated with the Rivers Ouse and Derwent), with a small section in Flood Zone 2 around Babthorpe.

- 3.5.13 Parts of the Solar PV Site are located within East Riding of Yorkshire's Minerals Safeguarding Area (MSA) EC6. Parts of the Grid Connection Corridor are located in an area of safeguarded surface mineral resource (the minerals being described as Brick Clay and Sand and Gravel) in North Yorkshire. See **Appendix D** of this Planning Statement for extracts from the mineral plan policies maps.
- 3.5.14 **Figure 3-5** shows all public rights of way (PRoW) within and surrounding the Order limits. There is a network of PRoW both within the Solar PV Site and the surrounding area. The 'Howden 20' circular recreational route passes along PRoW through the Solar PV Site and the Interconnecting Cable Corridor at various locations, as shown on **Figure 3-5**. There are no PRoW within the Ecology Mitigation Area.
- 3.5.15 The Scheme crosses the Consultation Zones of two Major Accident Hazard (MAH) sites:
- a. ITS Inglis Transport Services Ltd, Spaldington Airfield (Grid Connection Corridor and Solar PV Areas 2b, 2c and 2d); and
 - b. Drax Power Limited Grid Connection Corridor.
- 3.5.16 Further details regarding these MAH sites are provided in **Chapter 16: Other Environmental Topics, ES Volume 1 [EN010143/APP/6.1]**.



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CLIENT
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- LEGEND**
- Order limits
 - Land not included in the Order limits
 - Site Access
 - Solar PV Site (xx = Solar PV Area)
 - Ecology Mitigation Area (xx = Ecology Mitigation Area)
 - Grid Connection Corridor
 - Interconnecting Cable Corridor
 - 1km Buffer of the Order limits

- Environmental and Planning Constraints**
- ★ Existing Agricultural Building
 - Listed Building - Grade I
 - Listed Building - Grade II*
 - Listed Building - Grade II
 - River
 - SEGL 2 Cable Route
 - Scheduled Monument
 - Ancient Woodland
 - Special Area of Conservation (SAC)
 - Special Protection Area (SPA)
 - Ramsar
 - Local Nature Reserve (LNR)
 - National Nature Reserve (NNR)
 - Site of Special Scientific Interest (SSSI)
 - Overhead Electricity Line
 - Electricity Underground Cable
 - National Grid Drax Substation
 - Gas Pipeline
 - Gas Site

- Environment Agency Flood Zones**
- Flood Zone 2
 - Flood Zone 3

ISSUE PURPOSE
Planning Statement

PROJECT NUMBER
60683115

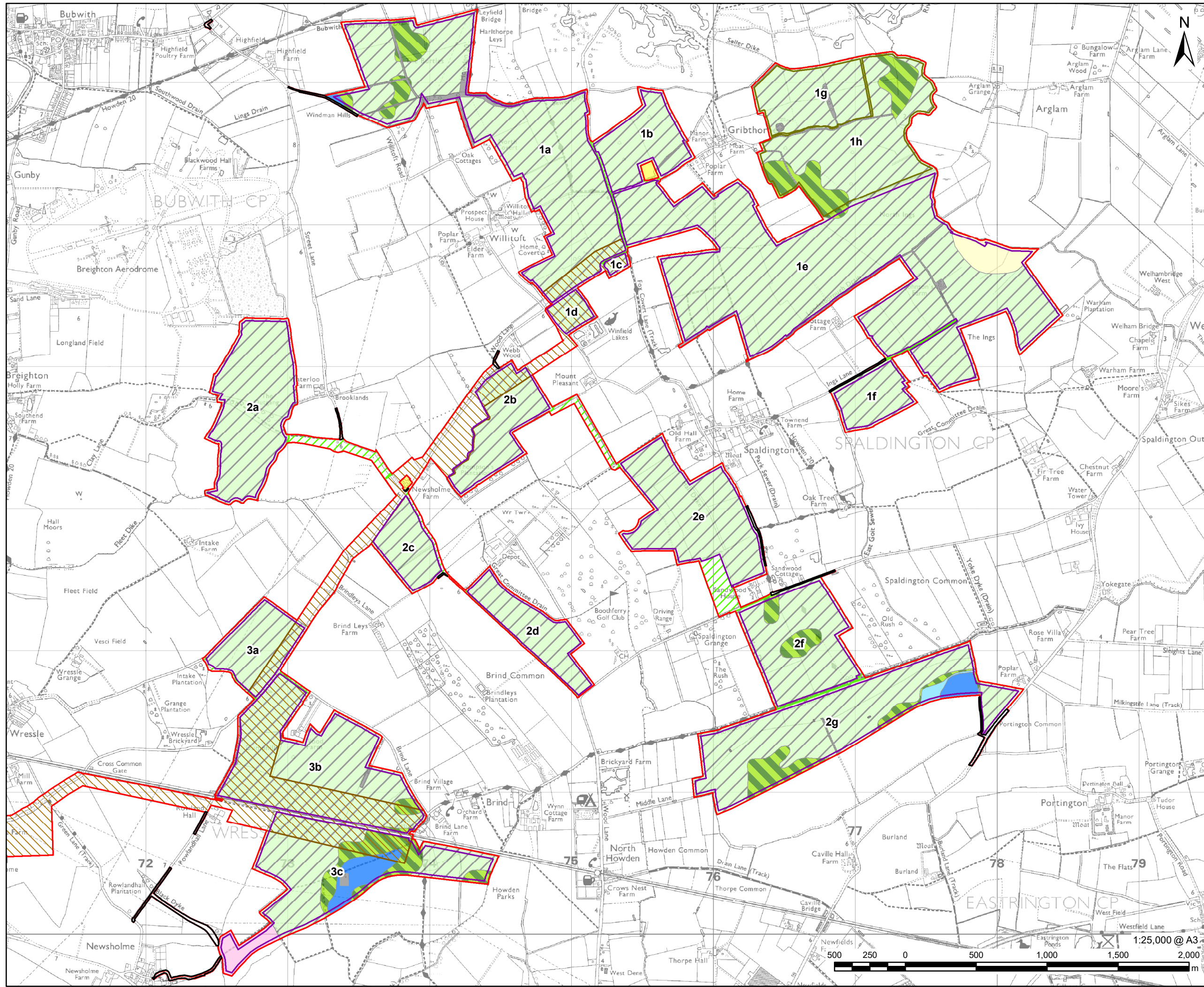
FIGURE TITLE
Environmental and Planning Constraints

FIGURE NUMBER
Figure 3-3

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LEGEND

- Order limits
 - Land not included in the Order limits
 - Solar PV Site (xx = Solar PV Area)
 - Ecology Mitigation Area (xx = Ecology Mitigation Area)
 - Site Access
 - Grid Connection Corridor
 - Interconnecting Cable Corridor
- Agricultural Land Classification (ALC)**
- Grade 1
 - Grade 2
 - Subgrade 3a
 - Subgrade 3b
 - Grade 4
 - Non-Agricultural
 - Missing Field Data: Modelled as Subgrade 3b

NOTES
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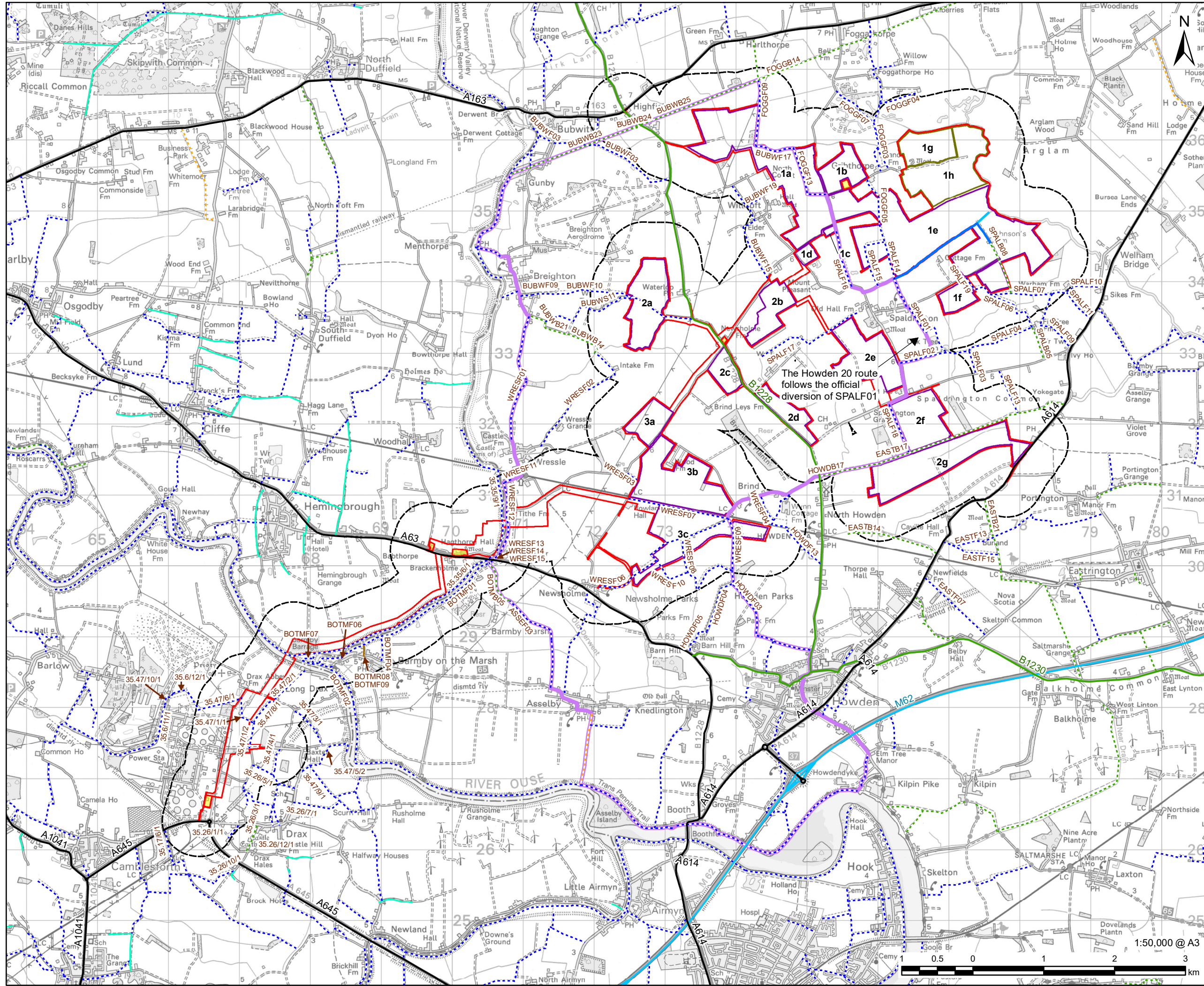
ISSUE PURPOSE
Planning Statement

PROJECT NUMBER
60683115

FIGURE TITLE
Agricultural Land Classification Survey for the Solar PV Site

FIGURE NUMBER
Figure 3-4

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East Yorkshire Solar Farm

CLIENT
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- LEGEND**
- Order limits
 - Land not included in the Order limits
 - Solar PV Site (xx = Solar PV Area)
 - Ecology Mitigation Area (xx = Ecology Mitigation Area)
 - 500m Buffer of the Order limits
 - A Road
 - B Road
 - Motorway
 - Howden 20 Circular Route
 - Public Rights of Way**
 - Bridleway
 - Byway Open to All Traffic (BOAT)
 - Footpath
 - Restricted Byways
 - Unsurfaced Unclassified Road
 - Proposed Permissive Bridleway and Footpath**
 - Proposed Permissive Bridleway
 - Proposed Permissive Footpath

NOTES

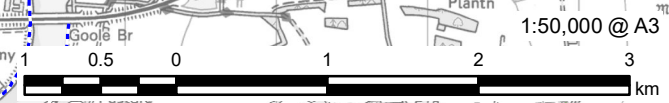
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ISSUE PURPOSE
Planning Statement

PROJECT NUMBER
60683115

FIGURE TITLE
Public Rights of Way

FIGURE NUMBER
Figure 3-5



3.6 Planning History

- 3.6.1 **Chapter 17: Cumulative Effects and Interactions, ES Volume 1 [EN010143/APP/6.1]** and the relevant technical chapters of the **ES [EN010143/APP/6.1]** assess the cumulative impacts of the Scheme with other schemes. A search of cumulative schemes involved establishing a 'long list' of other developments and local plan allocations within a 5 km 'zone of influence' (Zol).
- 3.6.2 Developments included in the initial long list were based on criteria agreed with the local planning authorities. The criteria were developed having regard to the Planning Inspectorate's Advice Note 17 (Ref. 51) and utilising experience of assessing cumulative effects for schemes of a similar nature and scale to the Scheme. The criteria included looking at:
- a. Development currently under construction that would have previously met one of (d) to (g);
 - b. Approved applications which have not yet been implemented (covering the past five years and taking account of those that received planning consent over three years ago and are still valid but have not yet been implemented), and meet one of (d) to (g);
 - c. Submitted applications not yet determined meeting one of (d) to (g);
 - d. Development listed on the National Infrastructure Planning Programme of Projects within 5 km of the Order limits¹ (Other applications for EIA development within 5 km of the Order limits including applications for EIA screening and scoping opinions;
 - e. Development allocations identified in the relevant Development Plan (and emerging Development Plans) within 5 km of the Order limits;
 - f. Other, non-EIA applications for solar development, excluding householder or small-scale roof mounted solar developments, within 5 km of the Order limits; and
 - g. Stage 2 – Identify shortlist of 'other development' for Cumulative Effects Assessment
- 3.6.3 Following this, any developments of a nature or scale without the potential to result in likely significant cumulative effects were excluded, following discussion with the local planning authorities and consideration of the likely Zol for each environmental topic. The long list of cumulative developments has informed a 'short list' presented in **Appendix 17-1, ES Volume 2 [EN010143/APP/6.2]**
- 3.6.4 Using the 'short list', this section of the Planning Statement provides an overview of the relevant planning history within or adjacent to the Order limits below. As the Site is largely agricultural, the relevant planning history within the Order limits is not extensive. Most of the recent planning history in the vicinity of the Order limits is associated with applications for NSIPs or major applications surrounding Drax power station and is considered

¹ In this case, Order limits does not include the accesses which are beyond the extend of the Solar PV Site, Ecology Mitigation Area and Grid Connection Corridor.

relevant. The locations of these are shown at **Figure 3-6** and these schemes are summarised below.

Scotland to England Green Link (SEGL) 2

- 3.6.5 SEGL2 is a major TCPA development that comprises the construction of a sub-surface grid connection from Drax Power Station to Fraisthorpe Coastline. The subsea cable then extends to Scotland. The development is sited within both East Riding of Yorkshire (planning permission reference 22/01990/STPLFE) and North Yorkshire authority boundaries (Planning permission reference 2022/0711/EIA). The application was approved by East Riding of Yorkshire Council on the 3 March 2023 and approved by North Yorkshire Council on the 11 August 2023. The installation start date is expected in late 2024, to be completed by end of 2029. SEGL2 will be partially within the Order limits with the AC Grid Connection, temporary construction compound, access routes, earthworks, permanent attenuation pond overlapping with the proposed Grid Connection Corridor. The route will also be sited to the south of Solar PV Areas 2g and 3c. The Applicant has consulted with National Grid's SEGL2 team to discuss the Scheme and the potential interactions during construction and operation. Sheet 2 of **Figure 3-6** below shows how this project overlaps with the Scheme.

Drax Bioenergy with Carbon Capture and Storage Project

- 3.6.6 The Drax Bioenergy with Carbon Capture and Storage Project, proposed by Drax Power is a DCO application (reference EN010120) that comprises the installation of post-combustion capture technology that would capture carbon dioxide emissions from up to two of the existing biomass units at Drax Power Station. The proposal includes the construction and operation of carbon capture technology and associated equipment, and the integration of the units into the existing Common Services at Drax Power Station. The development is partially within the Application's Grid Connection Corridor. The Grid Connection Corridor for the Application would overlap with the scheme's proposed construction compound and access, habitat provision area, and electrical connections. The application for the Bioenergy with Carbon Capture and Storage Project has been submitted to the Secretary of State and is due to be determined by the 17 January 2024. The Applicant has consulted with Drax Power to discuss the Scheme and the potential interactions during construction and operation. Sheet 3 of **Figure 3-6** below shows how this project overlaps with the Scheme.

Humber Low Carbon Pipelines

- 3.6.7 National Grid's Humber Low Carbon Pipelines project is a DCO application (reference EN070006) comprising the construction of carbon dioxide (to facilitate CCUS) and hydrogen (H₂) transportation pipelines between Drax in North Yorkshire and Easington in East Riding of Yorkshire. The Cable Corridor route extends within the Grid Connection Corridor of the Scheme. The Statutory consultation was undertaken between the 31 October 2022 and 29 November 2022. An application is expected to be submitted to the Secretary of State for consideration towards the end of 2023 however there is limited information on the status of this application. Sheet 4 of **Figure 3-6** below shows how this project overlaps with the Scheme.

Drax Re-power

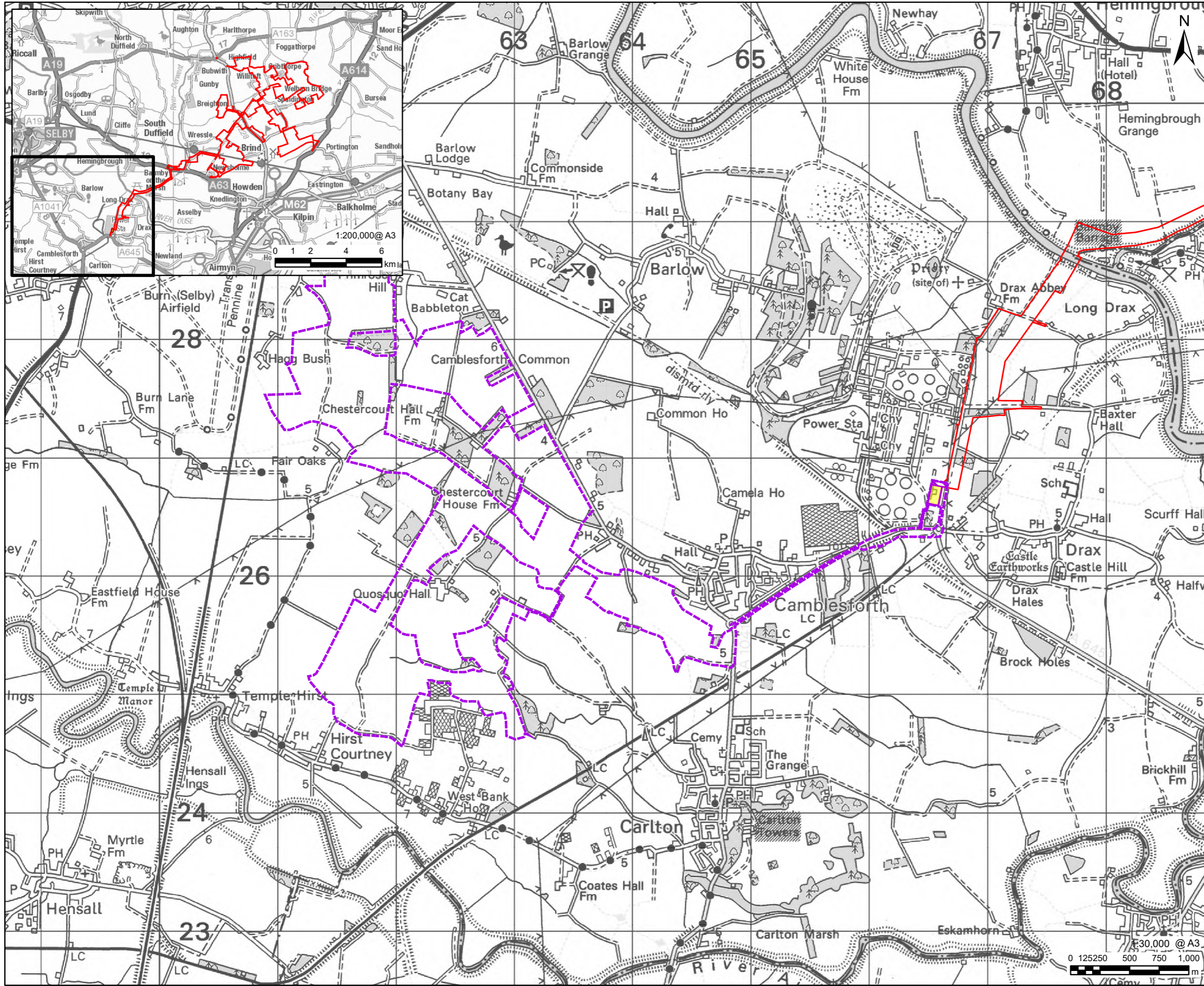
- 3.6.8 Drax Re-power is a DCO project (application reference EN010091) comprising of the modification of up to two of the coal-fired generating units (known as Units 5 and 6) at Drax Power Station, Selby, to become gas-powered generating plants. It is also proposed to construct a battery storage facility with capacity of up to 200 MW. The development would extend into the Order limits as there would be an overlap with the Grid Connection Corridor and the hardstanding car park, landscaping, site utilities and gas pipeline connection. A decision on the application for a DCO for Drax Re-power was taken on 4 October 2019 and the application was approved. The Applicant has consulted with Drax Power Station to discuss the Scheme and the potential interactions during construction and operation. Sheet 5 of **Figure 3-6** below shows how this project overlaps with the Scheme.

Lakeside Energy Storage

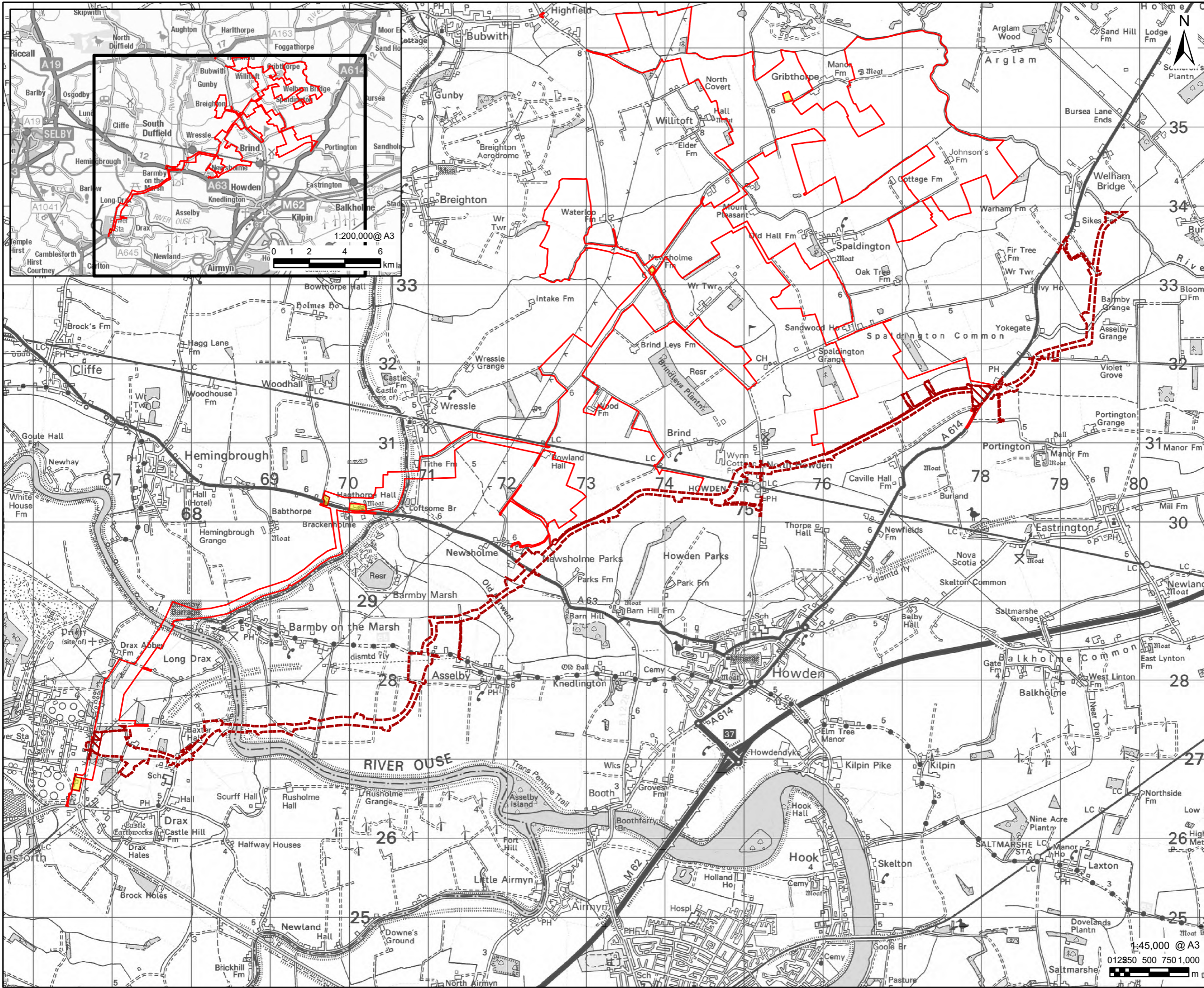
- 3.6.9 Lakeside Energy Storage (planning permission reference 2020/1357/FULM) comprises the development of an energy storage facility and associated development. The development was originally approved in May 2021, however, an application under Section 73 of the TCPA 1990 to vary conditions (Reference 2022/0397/S73) was submitted and approved in June 2022. The Grid Connection Corridor would overlap with an existing Northern Power Grid easement, temporary construction compound, and access. Sheet 6 of **Figure 3-6** below shows how this project overlaps with the Scheme.

Helios Renewable Energy Project

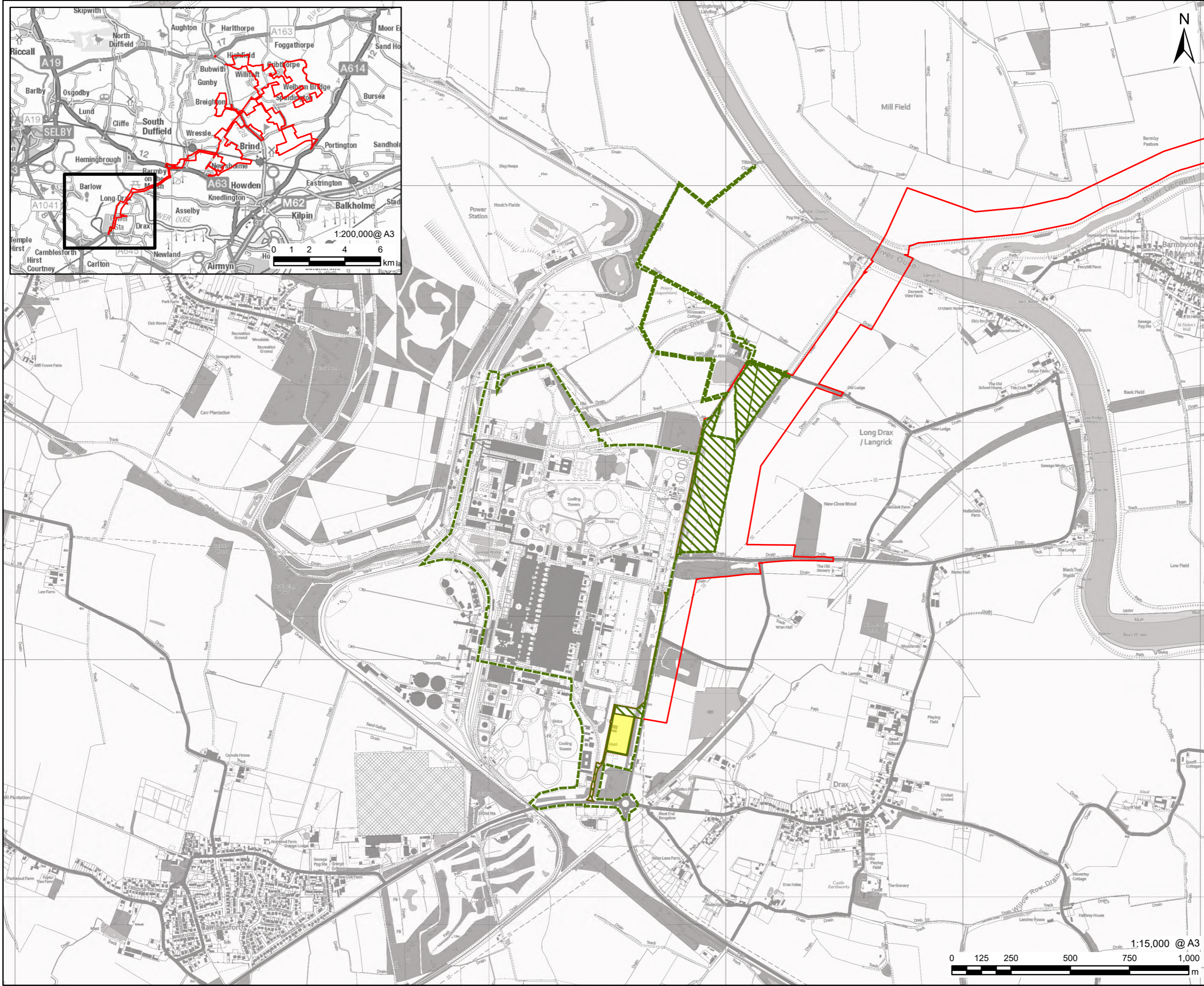
- 3.6.10 The Helios Renewable Energy Project is a DCO application (reference EN010140) proposed by ENSO Energy for the installation of ground mounted solar arrays, energy storage and associated development for the generation of over 50 megawatts of electricity. The project is largely situated to the south and west of Drax Power Station, however, a small area of the project's underground Grid Connection Area situated to the east of Drax Power Station would overlap with the proposed Grid Connection Corridor for the Scheme. The statutory consultation for this project is currently ongoing and will run between the 26 October 2023 until 7 December 2023. The Applicant has consulted with ENSO Energy to discuss the Scheme and the potential interactions during construction and operation. Sheet 1 of **Figure 3-6** below shows how this project overlaps with the Scheme.



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- Order limits
- Land not included in the Order limits
- Overlapping Cumulative Development Application**
- 4 - EN010120 - Drax Carbon Capture
- Area of Overlap

NOTES

Application references EN070006 and 21/01448/EI/ASCO only show the scoping boundary not development boundary. Where schemes extent out of the map frame, only a partial boundary has been captured to show the intersection with the site boundary.

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ISSUE PURPOSE

Planning Statement

PROJECT NUMBER

60683115

FIGURE TITLE

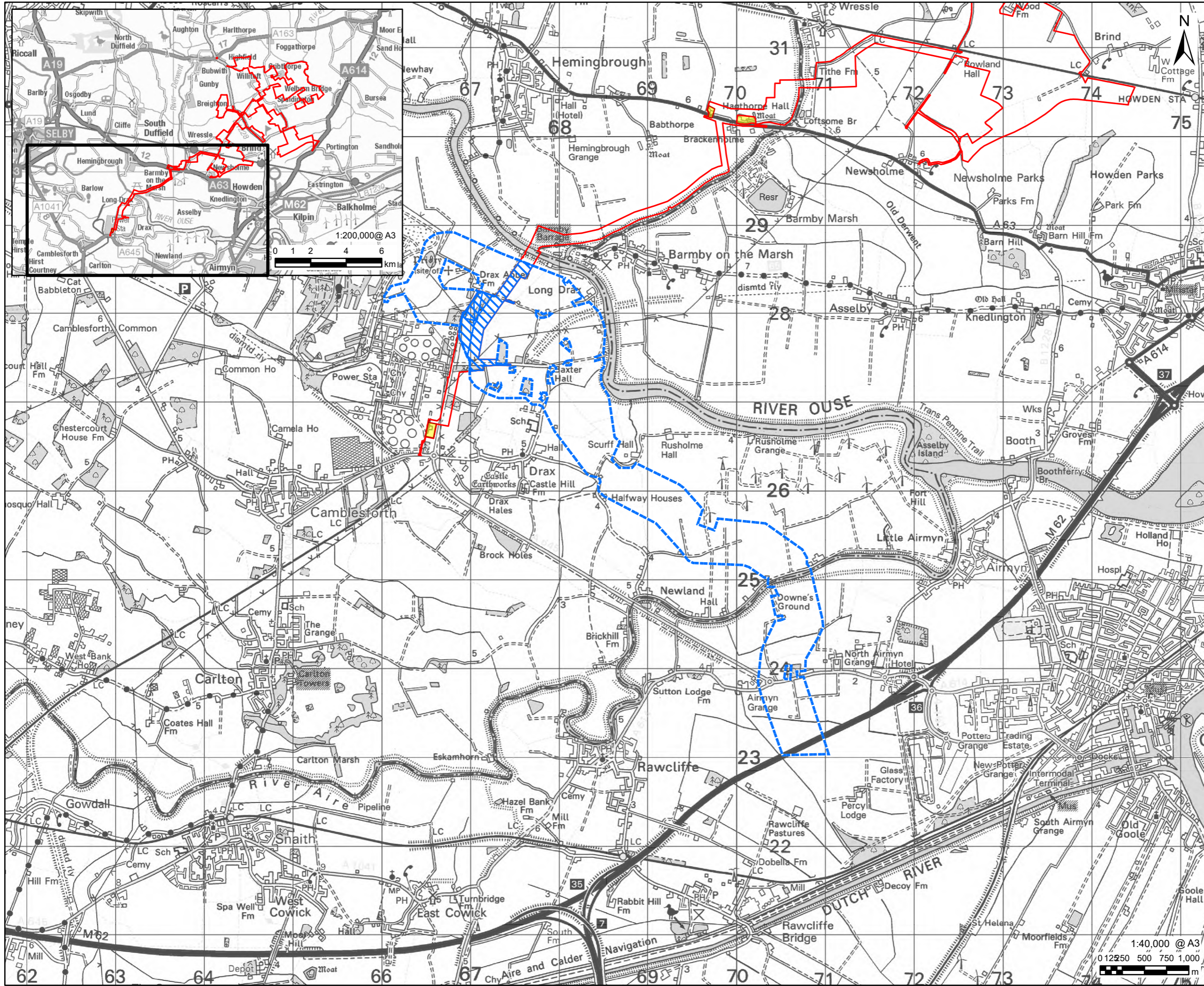
Overlapping Cumulative Development Application Locations

FIGURE NUMBER

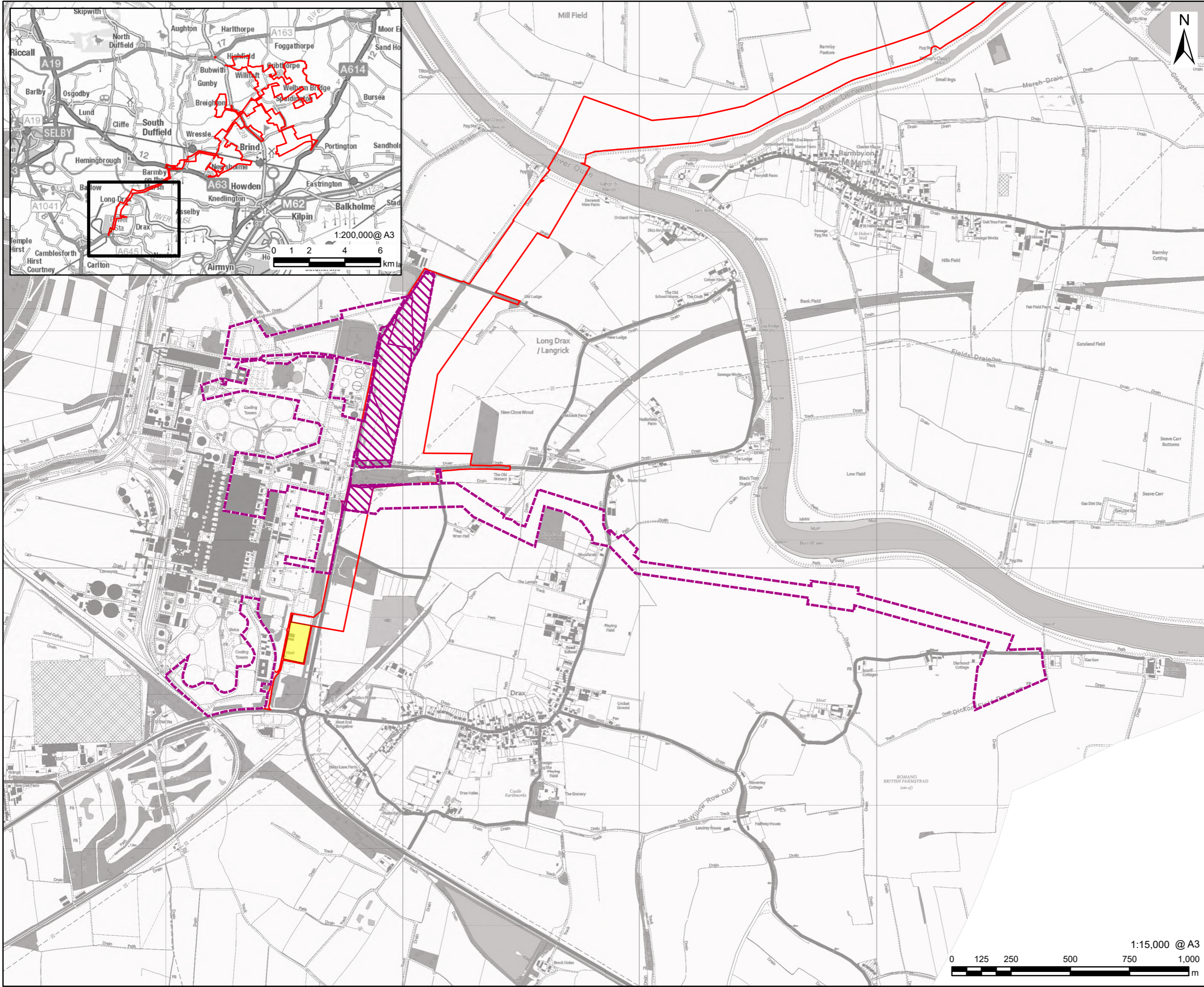
Figure 3-6 - Sheet 3



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PROJECT
East Yorkshire Solar Farm

CLIENT
East Yorkshire Solar Farm Limited

CONSULTANT
AECOM Limited
Midpoint,
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Basingstoke, RG21 7PP
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- LEGEND**
- Order limits
 - Land not included in the Order limits
 - Overlapping Cumulative Development Application**
 - 6 - EN010091 - Drax Re-power.
 - Area of Overlap

NOTES

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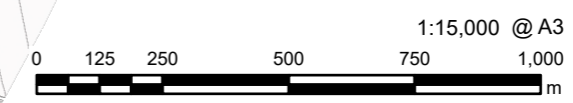
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ISSUE PURPOSE
Planning Statement

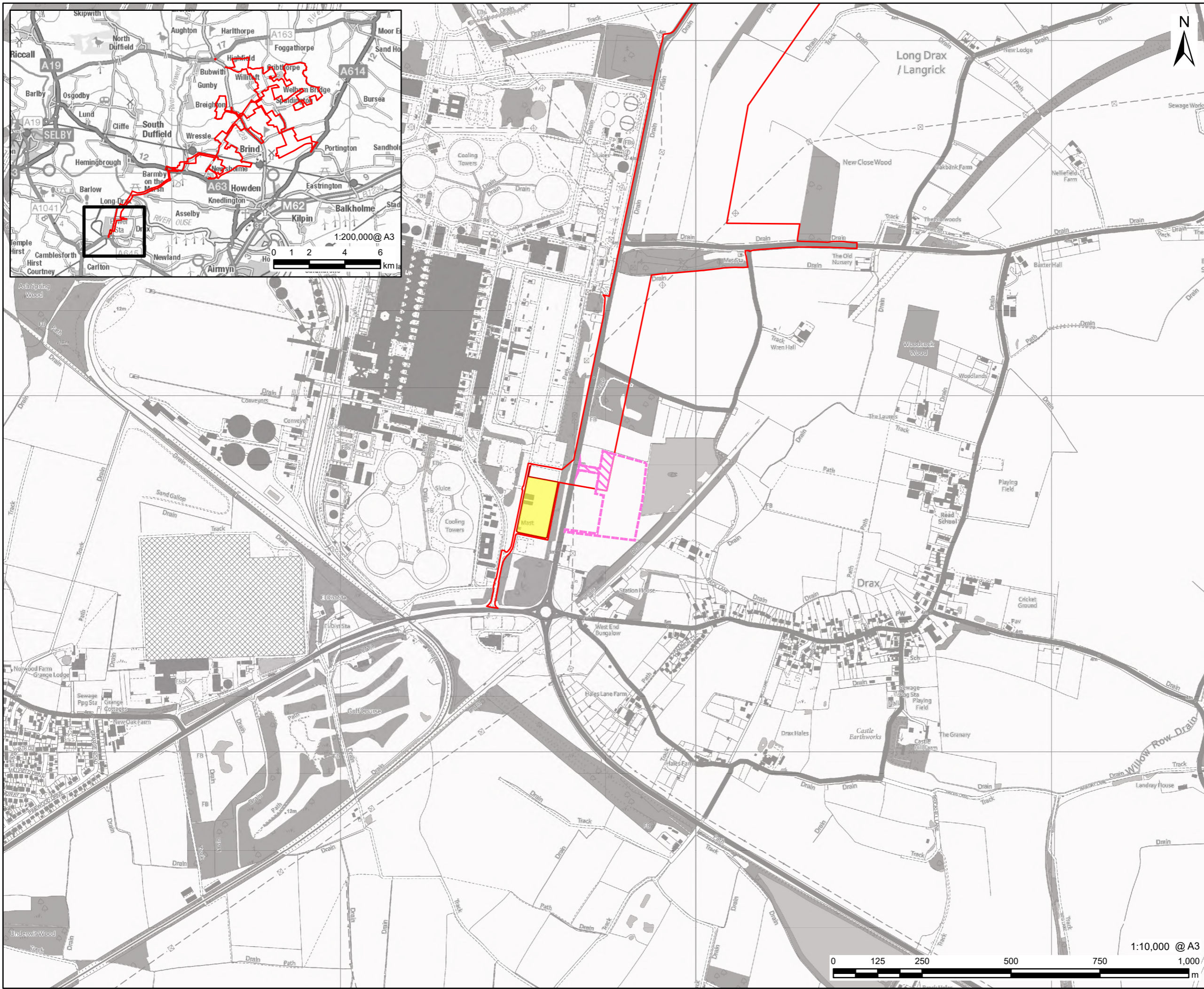
PROJECT NUMBER
60683115

FIGURE TITLE
Overlapping Cumulative Development Application Locations

FIGURE NUMBER
Figure 3-6 - Sheet 5



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ISSUE PURPOSE
Planning Statement

PROJECT NUMBER
60683115

FIGURE TITLE
Overlapping Cumulative Development Application Locations

FIGURE NUMBER
Figure 3-6 - Sheet 6



4. The Scheme

4.1 Introduction

- 4.1.1 This section provides a summary of the main components of the Scheme, in the context of the **draft DCO [EN010143/APP/3.1]** and the proposed construction, operational, and decommissioning activities.

4.2 Definition of the Scheme in the DCO

- 4.2.1 Article 3 of the **Draft DCO EN010143/APP/3.1** provides that, subject to the provisions of the Order including the requirements in Schedule 2, development consent is granted for the “*authorised development*”.
- 4.2.2 For this purpose, “*authorised development*” is defined in Article 2 of the **Draft DCO [EN010143/APP/3.1]** “*means the development described in Schedule 1 (authorised development) and any other development within the meaning of section 32 (meaning of “development”) of the 2008 Act authorised by this Order*” (Ref. 1).
- 4.2.3 Schedule 1 of the **Draft DCO [EN010143/APP/3.1]** defines the NSIP (Work No.1), and the associated development (Work No. 2 - Work No. 8). If consented, the DCO would permit the authorised development defined in Schedule 1 of the **Draft DCO [EN010143/APP/3.1]** within the limits shown on the **Works Plan [EN010143/APP/2.3]**. This includes all works required for the construction of the Solar PV Site, Interconnecting Cable Corridor, Ecology Mitigation Area, Grid Connection Corridor and Site Accesses.
- 4.2.4 The following schedules of the **Draft DCO [EN010143/APP/3.1]** and related plans define, and secure works related to streets:
- a. Schedules 4, 5, 6 and 7 of the **Draft DCO [EN010143/APP/3.1]** and the **Streets Works, Accesses and Rights of Way Plan [EN010143/APP/2.4]** define those streets that are subject to street works and streets and public rights of way that would be temporarily restricted.
 - b. Schedule 8 of the **Draft DCO [EN010143/APP/3.1]** and the **Traffic Regulations Measures Plan [EN010143/APP/2.5]** define those streets that would be subject to traffic signals and controls.
- 4.2.5 The plans set out above are certified documents as set out in Schedule 12 of the **Draft DCO [EN010143/APP/3.1]**.

4.3 Flexibility

- 4.3.1 Paragraph 4.2.7 of NPS EN-1 (Ref. 3) recognises that 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 determined in precise detail. Paragraph 4.2.8 (Ref. 3) continues that where some details are still to be finalised the ES should set out to the best of the applicant’s knowledge, what the likely worst case environmental, social and economic effects of the Scheme may be and assess on that basis to ensure that the impacts of the project as it may be constructed have been properly assessed.

- 4.3.2 Draft NPS EN-3 (Ref. 4) also states that it is likely that flexibility will be needed in relation to dimension, layout and spacing of panels and energy storage (Paragraph 3.10.61). Applications may include a range of options based on different panel numbers, types and layout, and with and without energy storage (Paragraph 3.10.62). Where other specific details of the design of the site are uncertain at the time of application, that should be made clear by the applicant with the reasons for the uncertainty given.
- 4.3.3 The Applicant requires flexibility regarding the design detail of certain components of the Scheme as acknowledged in Draft NPS EN-1 part 4.2 (Ref. 2) and part 3.10 of the Draft NPS EN-3 (Ref. 4). The extent of flexibility required is described in **Chapter 2: The Scheme, ES Volume 1 [EN010143/APP/6.1]** and set out in the **Outline Design Principles Statement [EN010143/APP/7.4]**.
- 4.3.4 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 in accordance with Planning Inspectorate's Advice Note 9 (Ref. 52). 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.

4.4 Components of the Scheme

- 4.4.1 This section provides a summary of the main components of the Scheme with the corresponding Work numbers as specified in Schedule 1 of the **Draft DCO [EN010143/APP/3.1]** and shown on the **Works Plan [EN010143/APP/2.3]**. A full description of the Scheme is provided in **Chapter 2: The Scheme, ES Volume 1 [EN010143/APP/6.1]**. **Figure 2-3, ES Volume 3 [EN010143/APP/6.3]** illustrates the indicative layout for the Scheme.
- 4.4.2 The main components of the Scheme include:
- a. Solar photovoltaic (PV) Panels (Work No. 1);
 - b. Solar PV panel mounting structures (collectively referred to as 'tables' or 'strings'. Groupings of solar PV tables are referred to as 'arrays') (Work No. 1);
 - c. Field Stations incorporating transformers, inverters (central or string) and switchgear, protection and control equipment (Work No. 1);
 - d. On-site cabling within the Solar PV Site - less than 1.0 kV, typically above ground locally between the Solar PV Panels and inverters and underground elsewhere (Work No. 4);
 - e. Interconnecting Cables – 33 kV underground cabling between the Solar PV Areas which transmit electricity from the Field Stations to one of the two Grid Connection Substations (Work No. 4);
 - f. Two (33 kV/132 kV) Grid Connection Substations (Work No. 2);

- g. Grid Connection Cables (two 132 kV export circuits) connecting the Grid Connection Substations to the National Grid Drax Substation (Work No. 3);
 - h. Underground link boxes (approximately 17 in total) – approximately every 900 m of Grid Connection Cable routing (Work No. 3);
 - i. Operations and maintenance hub with welfare facilities (Work No. 6);
 - j. Fencing and security measures (e.g., lighting and CCTV);
 - k. Accesses including tracks and visibility splays and permissive paths;
 - l. Construction and decommissioning laydown areas; and
 - m. Landscaping and biodiversity enhancement including an Ecology Mitigation Area (Work No. 8) comprising:
 - i. Golden Plover Mitigation Zone – 28.75 ha near to River Foulness to be managed as wet grassland habitat; and
 - ii. Goose Mitigation Zone – 79.09 ha to remain in the current arable rotation with amendments to improve habitat quality such as increased retention of stubble.
- 4.4.3 The Scheme will deliver the Grid Connection Cables into an existing spare bay of the National Grid Drax Substation. All works to the National Grid Drax Substation to accommodate the Scheme connection would be undertaken by National Grid and are beyond the scope of this DCO Application. The work undertaken by National Grid will include the installation of a transformer and associated infrastructure which will convert the 132 kV electricity supplied by the Scheme to 400 kV to facilitate the efficient transmission of power onto the electricity transmission network. All infrastructure within the National Grid Drax Substation would remain under National Grid's control.
- 4.4.4 Further details regarding the Scheme and the process that has led to its design are discussed within the **Design and Access Statement [EN010143/APP/7.2]**. The **Outline Design Principles Statement [EN010143/APP/7.4]** also sets out the principles of the design, ensuring that a good design is secured, and that those principles are implemented.

4.5 Construction Activities

Overview

- 4.5.1 A detailed description of the construction activities that are likely to be required is set out in **Chapter 2: The Scheme, ES Volume 1 [EN010143/APP/6.1]**. It is anticipated that construction activities will be carried out in a sequential manner with construction teams responsible for specific type of works moving from one Solar PV Area to the next. In this case the works would start with fencing, followed by frame installation, then panel installation, then cabling and connection. It may be possible to generate electricity from some Solar PV Areas whilst others are being built, providing the associated 132/33 kV Grid Connection Substation and cabling is in place, subject to testing and commissioning.
- 4.5.2 Installation of cabling will use a mix of trenched and trenchless techniques depending on ground conditions and environmental sensitivities. Trenchless crossings will use Horizontal Directional Drilling (HDD).

- 4.5.3 Temporary welfare facilities within portacabins will be sited at Johnson's Farm.
- 4.5.4 A Construction Environmental Management Plan (CEMP) will be implemented to manage the environmental impacts of construction activities. This is secured by a requirement of the DCO (see Schedule 2 of the **draft DCO [EN010143/APP/3.1]**). The Applicant has produced a **Framework CEMP [EN010143/APP/7.7]** with the DCO Application and the final CEMP will need to substantially accord with this.

Construction Compounds, Access and Traffic

- 4.5.5 Temporary construction compounds comprising parking, storage, staff welfare and waste management will be located within the Order limits. In the Solar PV Site these will be created and 'built-out' as the solar installation progresses. The temporary construction compounds and site accesses during construction are shown on **Figure 2-4, ES Volume 3 [EN010143/APP/6.3]**. The Applicant is proposing to construct the Scheme from five main compounds. The main compounds and accesses for these compounds are listed below:
- a. Construction Compound Area A will be located in the western area of Solar PV Area 1a with access to be provided off a northern section of Willitoft Lane;
 - b. Construction Compound Area B will be located within Solar PV 2d and access will be provided on the B1228 opposite Spaldington Airfield Wind Farm;
 - c. Construction Compound Area C will be located in the south-western corner of Solar PV Area 3c to the north-east of Newsholme. Access will be provided from Rowlandhall Lane, along existing farm access tracks;
 - d. Construction Compound Area D will be located to the west of Loftsome Bridge Hotel and the River Derwent, with access provided off the A63 Hull Road to the south of the compound; and
 - e. Construction Compound Area E will be located on the western side of the River Derwent crossing, with access off Pear Tree Avenue.
- 4.5.6 Construction accesses will also be provided across the rest of the Site for construction works and are shown in **Figure 2-4, ES Volume 3 [EN010143/APP/6.3]**. Access will be provided off Street Lane for Solar PV Area 2a, and off Wood Lane for Solar PV Area 2b. There would be access off Ings Lane to Solar PV Area 1f. Access would also be provided off Willitoft Lane, and a farmers track which runs off it, to Solar PV Areas 2e and 2f. Access to Solar PV Area 3b would be provided off Rowlandhall Lane. Further south, access to the Grid Connection Corridor would be off Pear Tree Avenue and Carr Lane, with access into Drax Substation off the A645.
- 4.5.7 All HGVs will travel along the public highway to one of Construction Compounds A, B, D or E (routing is presented in the **Framework Construction Traffic Management and Travel Plan, ES Volume 2 [EN010143/APP/6.2]**). From here, materials will be transferred to smaller tractor-trailers similar to the agricultural vehicles currently using the road network, for onward transport to point of need.

- 4.5.8 There would be no HGV movements to and from Construction Compound C, only tractor-trailers (to and from Construction Compound B) using the access created off Rowlandhall Lane.
- 4.5.9 To reduce site traffic on local roads, it is proposed to utilise internal routes through the Solar PV Areas where practicable as the primary route for deliveries and staff movements.
- 4.5.10 Each HGV would generate two tractor trailer movements. At peak construction there is anticipated to be up to 25 HGV visits to the site a day, which means 50 HGV movements from tractors/trailers are anticipated to be travelling to and from the Site daily.

Construction Programme and Working Hours

- 4.5.11 Subject to the DCO being granted, the earliest construction could start is in 2025. Construction of the Grid Connection Cables is anticipated to require 12 months, whereas construction of the Solar PV Site will require an estimated 24 months. These periods would run concurrently.
- 4.5.12 Working hours will be from Monday to Friday 07.00 to 19.00 (daylight hours permitting) and on Saturdays 07.00 to 13.00 (daylight hours permitting). No Sunday or Bank Holiday working will be undertaken unless crucial to construction (for example HDD which must be a continuous activity) or in an emergency.

4.6 Operational Activities

Overview

- 4.6.1 An operations, maintenance and storage area will be established within the Solar PV Site at Johnson's Farm (Solar PV Area 1e) to provide welfare, office accommodation, and facilities for maintenance and storage throughout the operational life of the Scheme. The location of Johnson's Farm and Solar PV Area 1e are shown in **Figure 2-3, ES Volume 3 [EN010143/APP/6.3]**. It is anticipated that there will be three permanent staff employed during the operational phase, who will be based at Johnson's Farm.
- 4.6.2 During operation, activity within the Solar PV Site would be minimal and would be restricted principally to vegetation management including sheep grazing; equipment maintenance and servicing; periodic fence inspection and monitoring to ensure the continued effective operation of the Scheme. It is anticipated that maintenance and servicing would include the inspection, removal, reconstruction, refurbishment, or replacement of faulty or broken equipment and adjusting and altering the PV Array orientation to ensure the continued effective operation of the Scheme and improve its efficiency. The Applicant has prepared a **Framework Operational Environmental Management Plan (OEMP) [EN010143/APP/7.8]** which sets out the measures to be followed during the operation of the Scheme. The final OEMP, which is secured by a requirement of the DCO, will need to substantially accord with this.
- 4.6.3 Along the routes of the Grid Connection Corridor and Interconnecting Cable Corridor, operational activity will consist of routine inspections and any reactive maintenance such as where a cable has been damaged.
- 4.6.4 No solar PV infrastructure will be located within the Ecology Mitigation Area. The Ecology Mitigation Area will be managed and maintained during the

operation of the Scheme to provide habitats for the overwintering and migratory bird species. Further details of the creation and management of this area are provided in the **Habitats Regulation Assessment [EN010143/APP/7.12]** and the **Framework Landscape and Ecological Management Plan (LEMP) [EN010143/APP/7.14]**.

Operational Access

- 4.6.5 Site Accesses are shown shaded blue on **Figure 1-3, ES Volume 3 [EN010143/APP/6.3]**. All these accesses except one, will be used through construction, operation and decommissioning.
- 4.6.6 The site access off Rowlandhall Lane into Solar PV Area 3c will only be used at construction and decommissioning.
- 4.6.7 During the operational phase of the Scheme access to Solar PV Area 3c will use the access through Newsholme village (this access will not be used at construction or decommissioning). Use of the Newsholme village access during operation will largely be restricted to access by site staff and maintenance workers with vehicles using this route being no larger than a van or Light Goods Vehicle (LGV). The access can accommodate tractor-trailers but use by this size of vehicle would be very infrequent, likely restricted to panel cleaning operations which would be undertaken every two years as a worst case. Tractor access would also be required for grass cutting within the Solar PV Site if grazing is not undertaken.

4.7 Decommissioning Activities

- 4.7.1 A detailed description of the decommissioning activities and their assessment is provided in **Section 2.8 of Chapter 2: The Scheme, ES Volume 1 [EN010143/APP/6.1]**. The design life of the Scheme is 40 years with decommissioning to commence 40 years after final commissioning. This is secured by requirement 18 in the **draft DCO [EN010143/APP/3.1]**.
- 4.7.2 Decommissioning is expected to take between 12 and 24 months and could be undertaken sequentially.
- 4.7.3 Following decommissioning activities, the majority of the land within the Solar PV Site will be returned in its original condition and could therefore return to its original use.
- 4.7.4 The future of the Grid Connection Substations, associated control and metering buildings in Solar PV Area 1c and the Grid Connection Cables (132kV cabling), would be agreed with the Local Planning Authority as part of requirement 18 to provide a Decommissioning Environmental Management Plan (DEMP). A **Framework DEMP [EN010143/APP/7.9]** has been prepared which the final DEMP will need to substantially accord with this.

5. The Need and Benefits of the Scheme

5.1 Introduction

- 5.1.1 This section of the Planning Statement summarises the need for the Scheme and the wider benefits it will bring.
- 5.1.2 There is an urgent global need to generate energy using renewable and low carbon sources to provide sufficient, reliable and affordable sources of electricity, whilst meeting national climate change and carbon reduction targets and budgets.
- 5.1.3 A detailed review of why the Scheme is urgently required at the scale and location proposed is set out in the **Statement of Need [EN010143/APP/7.1]**, which also explains how the Scheme addresses relevant aspects of established and emerging government energy and climate change policy and commitments.

5.2 The Need for the Scheme

- 5.2.1 The Government expects large scale solar generation to make an important contribution to achieving its decarbonisation requirements and climate change targets, as well as its objectives for the UK's power system, which includes ensuring the supply of energy remains secure, reliable and affordable.
- 5.2.2 Powering Up Britain (March 2023) (Ref. 37) presents the Government's most up to date strategy for the energy sector, stating the Government's ambition to increase solar five-fold by 2035, with a target of 70 Gigawatt (GW) of solar to be operational in the UK by 2035. The **Statement of Need [EN010143/APP/7.1]** states that to achieve the Government's target, approximately one solar scheme of a scale similar to the Scheme will need to be switched on each and every month between now and 2035.
- 5.2.3 NPS EN-1 (Ref. 3) states at paragraph 3.3.15 that new low carbon energy NSIP's are urgently required in the next 10–15 years (from its publication date in July 2011).
- 5.2.4 Whilst not specifically mentioned in the adopted NPSs, solar generation is increasing in both scale and importance within emerging government policy. Not only for the benefits it delivers to decarbonisation, but also because of the need for secure and affordable energy supplies.
- 5.2.5 Draft NPS EN-1 (Ref. 2) sets out at paragraph 3.3.20 that solar, along with wind, is expected to be the main form of electricity generation in the Government's targeted 2050 Net Zero energy system that is secure, reliable and affordable. It states:
- “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”.*
- 5.2.6 Without a rapid increase in low-carbon supply, decarbonisation of the energy sector, and other sectors is unlikely to occur. The **Statement of Need [EN010143/APP/7.1]** aligns with draft NPS EN-1 and concludes that many

low carbon generating technologies are urgently needed to meet the Governments energy objectives, which include:

- a. Providing security of supply.
- b. Providing an affordable, reliable system.
- c. Ensuring the system is Net Zero consistent.

5.2.7 The **Statement of Need [EN010143/APP/7.1]** concludes that in order to meet these objectives, the evidence therefore points to the development of proven technologies such as large scale solar as necessary, and states that such schemes should be brought forwards with urgency to make tangible and essential advances in decarbonisation in the near term.

5.2.8 The following sections summarise how the Scheme would meet the Governments energy objectives set out above.

Providing Security of Supply

5.2.9 The National Grid ESO (Electricity System Operator) sets out future energy scenarios (FES) (Ref. 53), which are a recognised suite of documents which indicate whether particular future pathways for electricity generation can be successful in line with current national policy targets.

5.2.10 The Scheme, as a leading large-scale solar scheme in the UK, represents approximately 2% of the additional solar generation capacity required in the FES projections to 2030, for scenarios compatible with net zero only. In this context, the Scheme is therefore an essential stepping stone towards the future of efficient decarbonisation through the deployment of large-scale, technologically and geographically diverse low-carbon generation assets.

5.2.11 Growth in solar capacity, alongside other renewable technologies, is expected to improve the dependability of those assets as a combined portfolio, and this is expected to reduce further any integration costs associated with such growth.

5.2.12 The **Statement of Need [EN010143/APP/7.1]** states that the Scheme, if approved, would contribute to an adequate and dependable UK energy generation mix, through enabling the generation of more low-carbon power from indigenous and renewable resources. Therefore, the approval, construction and operation of the Scheme will make a significant contribution to the UK's energy security needs, and the decarbonisation needs of the UK.

Providing an Affordable, Reliable System

5.2.13 As set out in the **Statement of Need [EN010143/APP/7.1]**, 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.

5.2.14 The **Statement of Need [EN010143/APP/7.1]** sets out that due to technological advances, solar facilities are already among the cheapest form of electricity generation in the UK and Government forecasts indicate that costs will continue to reduce in the future. Solar power is economically

attractive in the UK against many other forms of conventional and renewable generation.

- 5.2.15 Scale remains important, and maximising the generating capacity of schemes improves their economic efficiency, and so brings electricity generation to the market at the lowest cost possible. Larger solar schemes, such as the Scheme, 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 economic benefits in line with government policy.
- 5.2.16 As concluded in the **Statement of Need [EN010143/APP/7.1]** the Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure and low-carbon electricity both during and beyond the critical 2020s timeframe. Maximising the capacity of generation in the resource-rich, well-connected and technically deliverable proposed location for the Scheme, represents a significant and economically rational step forwards in the fight against the global climate emergency.

Ensuring the System is Net Zero Consistent

- 5.2.17 The Government's view, as set out in Draft NPS EN-1 (Ref. 2), is that a low-cost, net zero consistent system is likely to be composed predominantly of wind and solar.
- 5.2.18 The Scheme, along with other solar schemes, is therefore of critical importance on the path to net zero, with National Grid ESO scenarios predicting the need for 25–40GW of operational solar capacity in the UK by 2030, or an increase of between 10 and 25GW over the next 6 years.
- 5.2.19 The Scheme will connect to the National Energy Transmission System (NETS). This connection means that it plays its part in helping National Grid ESO manage the national electricity system. The Scheme would connect to an existing and available grid connection point, efficiently increasing utilisation of an already existing national infrastructure asset. The power it produces will be transmitted to the NETS and will be useable nationally.
- 5.2.20 The **Statement of Need [EN010143/APP/7.1]** states that low marginal cost and low marginal carbon emissions energy generated by the Scheme, can be confidently forecast and priced into future contracts for power delivery by all market participants, thus allowing all consumers to benefit from the reduced market price of solar generation.
- 5.2.21 The Scheme will generate power ahead of other potential technologies (which may have longer construction timeframes or have potentially not yet been proven at scale) which will support decarbonisation only in future years and only if they are brought forward. Therefore, the Scheme would directly respond to the urgent need to deliver a large amount of renewable generation capacity quickly.
- 5.2.22 The **Statement of Need [EN010143/APP/7.1]** concludes 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.
- 5.2.23 Without the Scheme, a significant and vital opportunity to develop a large-scale low-carbon generation scheme will have been missed, increasing

materially the risk that future Carbon Budgets and Net Zero 2050 will not be achieved.

- 5.2.24 In summary and as set out in the **Statement of Need [EN010143/APP/7.1]**, the Scheme is a leading UK large-scale solar development. 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. The Scheme addresses all important and relevant aspects of existing and emerging government policy.

5.3 Benefits of the Scheme

Overview

- 5.3.1 The Scheme provides the following benefits which are explained further below.

Electricity Generation

- 5.3.2 Based on the indicative layout for the Scheme presented in **Figure 2-3, ES Volume 3 [EN010143/APP/6.3]** the Scheme would have an installed capacity of approximately 400 MW. Over the 40-year lifetime of the Scheme, this would result in a total energy generation figure of approximately 15.9 TWh.
- 5.3.3 Ofgem estimates that the typical household in Britain uses 2,700 kWh of electricity per annum (Ref. 54). Therefore, the Scheme would generate enough electricity to power approximately 147,222 homes per annum. This is a significant increase in electricity generation with recognition that more electricity generation is needed to meet demand.

Decarbonisation

- 5.3.4 The benefits that the Scheme will provide to decarbonisation are outlined in the **Statement of Need [EN010143/APP/7.1]** and also summarised above. In addition, **Chapter 6 Climate Change, ES Volume 1 [EN010143/APP/6.1]** estimates that the carbon intensity of the Scheme is approximately 15.1 grams of carbon dioxide equivalent per kilowatt-hour of electricity generated (gCO₂e/kWh). The carbon intensity is the amount of carbon generated per kWh taking into account the lifetime emissions of the Scheme associated with its construction, operation and decommissioning.
- 5.3.5 The current UK grid carbon intensity is 212 gCO₂e/kWh, however these figures cannot be directly compared as the published UK grid carbon intensity figure only takes into account operational emissions from the generation of electricity, overwhelmingly from the fossil fuels used to power gas-fired and occasionally coal-fired power stations. For a meaningful comparison to be made between the Scheme and the UK grid, the operational carbon intensity of the Scheme must only include emissions from the ongoing operations of the Scheme and exclude emissions from construction and decommissioning. Combining lifetime generation figures and operational emissions figures gives an operational carbon intensity value of 4.1 gCO₂e/kWh.

- 5.3.6 Comparing the Scheme against a gas fired Combined Cycle Gas Turbine (CCGT) generating facility (currently the most carbon-efficient fossil-fuelled technology available), a representative figure for the carbon intensity of a CCGT is 354 gCO_{2e}/kWh. The operational carbon intensity of the Scheme is therefore 98.8% lower than that of a CCGT. Each kWh of electricity generated by the Scheme will emit 350 gCO_{2e} less than if it was generated by a gas fired CCGT generating facility.
- 5.3.7 Combining this figure with the estimated lifetime output from the Scheme indicates an overall lifetime carbon reduction, relative to the CCGT, of over 5.5 million tCO_{2e}. The overall greenhouse gas impact of the Scheme is therefore significantly beneficial and the Scheme will play a vital part in achieving the rate of transition required by nationally set policy commitments and supporting the trajectory towards net zero.

Ecological Enhancements

- 5.3.8 The **Framework LEMP [EN010143/APP/7.14]** sets out details of the landscape and ecological mitigation and enhancements that will be provided as part of the Scheme. The provision of a detailed LEMP and implementation the prescriptions it contains are secured through a requirement of the DCO.
- 5.3.9 The **Framework LEMP [EN010143/APP/7.14]** states that the Scheme would include the provision of new green infrastructure elements and corridor throughout the Solar PV Site, to increase habitat connectivity, enhance landscape condition and improve visual amenity within sometimes degraded agricultural landscapes. This would include the provision of semi-improved and species-rich grassland under the solar panel areas, providing an extensive habitat. This grassland would be suitable for grazing whilst offering a greater species diversity than the existing improved grassland or arable crops.
- 5.3.10 The change from predominantly arable farming practice to permanent pasture/grassland cover under PV panels is also beneficial to the structure of soils within the Solar PV Site as permanent plant cover protects soils from wind and water erosion. Trafficking by farm machinery is reduced and soil structure is enhanced improving water infiltration and gaseous exchange. The reduction in tillage such as occurs over the majority of the Solar PV Site at present allows for increase in soil carbon. Research published by the British Society of Soil Science (BSSS) (Ref. 55) identifies that the greatest and most rapid soil carbon gains can be achieved through land use change, particularly conversion from arable land to grassland or woodland.
- 5.3.11 The Scheme proposes planting of new woodland and shelter belts, creation of scrub, woodland edge and associated mosaic habitats; planting of new native species rich hedgerows with hedgerow trees and the creation of a new native traditional orchard. This will all provide increased structure, ecological connectivity and habitat. The Scheme's proposed mitigation planting will increase the overall woodland cover across the Scheme and connectivity of woodland habitats by linking existing areas of woodland with new areas of planting. In addition, new woodland will provide a robust boundary to screen the Solar PV Areas.
- 5.3.12 Locally appropriate flower-rich grassland with pollen and nectar-rich flowers for pollinators, which are beneficial to insects and attractive to farmland birds

would also be provided in an ornamental display along public rights of way and for sensitive residential receptors.

- 5.3.13 The Scheme proposes to install a range of artificial bird and bat boxes in existing woodland and trees, and retained/modified buildings, to increase the availability of nesting and roosting features and enhance their value as habitat for these species. Habitat piles and hibernacula will be in suitable areas using natural materials generated during clearance of the site, such as logs, turf, and grass strimmings. These will provide refuge and hibernation opportunities for amphibians and reptiles, as well as dead wood habitat for invertebrates, which would in turn benefit fauna such as bats and birds.
- 5.3.14 Grassland habitats will be created to provide a corridor connecting Willitof and Gribthorpe whilst allowing for separation between the Solar PV Areas on the approach to Gribthorpe.
- 5.3.15 Land adjacent to the River Foulness has been identified as one of the most sensitive features within the Site and will be utilised to deliver ecological mitigation and enhancement. A damp grassland habitat will be created adjacent to the River Foulness in Ecology Mitigation Area 1h. This habitat type will extend southwards to join with a similar area of habitat in the east of Solar PV Area 1e (**Figure 2-3, ES Volume 3 [EN010143/APP/6.3]**). The habitat type will therefore extend along the eastern extents of the Solar PV Site along the flood zone. The remaining land within Ecology Mitigation Area 1h and the land in Ecology Mitigation Area 1g will remain in arable rotation.
- 5.3.16 Hedgerows generally will be repaired and enhanced across the Scheme and additional tree planting is proposed.
- 5.3.17 As set out in the **Framework LEMP [EN010143/APP/7.14]**, the Scheme will carry out the management of existing woodland and trees to ensure longevity, increased species diversity, enhanced habitat value and greater resilience to climate change. This will include gapping up existing woodland and hedgerows where appropriate to increase the species and age diversity and include resilient species.
- 5.3.18 Within the Solar PV Site, areas of undeveloped land have been included within the Scheme to provide permanent habitat for ground-nesting birds such as skylark. These areas will be managed as grassland.
- 5.3.19 The Applicant is committed to exceeding the Government's 10% target for biodiversity net gain as set out in the Environment Act 2021 (Ref. 41). A **Biodiversity Net Gain (BNG) report [EN010143/APP/6.2]**, Natural England's Biodiversity Metric 4.0, has been produced for the DCO Application. This report demonstrates that the Scheme has the potential to deliver significant biodiversity net gain on the Site, with 80% gain predicted for habitat biodiversity units.

Permissive Paths

- 5.3.20 Permissive paths to enhance connectivity of the current PRoW network will be provided as part of the Scheme. These will be available during the operational stage of the Scheme. Two indicative routes are shown on **Figure 2-3, ES Volume 3 [EN010143/APP/6.3]**.
- 5.3.21 The first proposed permissive path is a continuation of the permissive path allowing travel on horses SPALB08 which currently terminates at Johnson's

Farm (the site of the Operations and Maintenance Hub). This is proposed to also allow travel on horses in response to feedback from the East Riding of Yorkshire Council's PRoW team. The proposed permissive path runs northwards for approximately 340 m until it connects with the second proposed permissive path.

- 5.3.22 The second proposed permissive path runs eastwards from footpath SPALF14, connecting with the first permissive path and continuing eastwards to the edge of the grassland habitat created in the east of Solar PV Area 1e. The path would be approximately 1.4 km in length. From discussions with East Riding of Yorkshire Council's PRoW Team it is proposed that the section from SPALF14 to the connection with the first permissive path will allow travel on horses.
- 5.3.23 From the point where the two permissive paths meet, heading westwards it is anticipated that the route (approximately 250 m in length) will be a permissive path (i.e. a footpath).
- 5.3.24 The new routes will connect to and link existing PRoW to provide a new circular route. This will provide access for the local population to open space, which would have a beneficial effect as reported in **Chapter 14: Human Health, ES Volume 1 [EN010143/APP/6.1]**. Sections of both paths allow travel on horses and therefore meet East Riding of Yorkshire Council's aspirations for the provision of recreational routes for equestrian users.

Employment Generation

- 5.3.25 **Chapter 12: Socio Economics and Land Use, ES Volume 1 [EN010143/APP/6.1]** states that during construction, the Scheme will support, on average, 401 total net jobs per annum. Of these, 181 jobs per annum are expected to be taken up by residents within the local area.
- 5.3.26 The jobs created will be in the renewable energy sector, specifically relating to solar installation, but also electricity transmission. As such, they will contribute to the development of skills needed for the UK's transition to Net Zero by 2050 and described within the Net Zero Strategy: Building Back Greener (Ref. 39). The indirect jobs include those created within the supply chain and therefore reflect the opportunities for low carbon industries to contribute to the Scheme.
- 5.3.27 The Applicant is also committing to implementing a Skills, Supply Chain and Employment Plan for the construction of the Scheme which will include provision of employment opportunities for local people. This is a requirement of the DCO. A **Framework Skills, Supply Chain and Employment Plan [EN010143/APP/7.15]** accompanies the DCO Application. Where possible, there will be a preference for local staffing, and it is likely that the appointed contractors will employ trainees and apprentices as part of the construction workforce.
- 5.3.28 Similar employment benefits are also anticipated for the decommissioning phase.

Economic Benefits

- 5.3.29 As set out in **Chapter 12: Socio Economics and Land Use, ES Volume 1 [EN010143/APP/6.1]**, in Yorkshire and the Humber, Gross Value Added (GVA) per worker in the construction sector is estimated to be £63,314 per

head. By applying this figure to the total direct construction workers generated by the Scheme, it is estimated that construction will contribute approximately £22.5 million to the national economy, of which £10.1m would likely be within the local area.

- 5.3.30 Construction activities associated with the Scheme will provide access to employment in this phase, which will provide a beneficial health impact to these workers. There is evidence that employment matters to health, not only from an economic perspective, but also in terms of quality of life. Good quality work protects against social exclusion through the provision of income, social interaction, identity and purpose which the Scheme will help to deliver through its construction phase. Similar economic benefits are also anticipated for the decommissioning phase.

6. Planning Appraisal

6.1 Introduction

- 6.1.1 This section presents an appraisal of compliance of the Scheme with the main policy requirements identified following a review of the documents identified in Section 2 of this Planning Statement.
- 6.1.2 **Appendix A**, NPS Accordance Table and **Appendix B**, Local Policy Accordance Table, set out an analysis of compliance with the specific policies of the suite of designated and emerging National Policy Statements for Energy and local planning policies, respectively.
- 6.1.3 The appraisal considers the construction, operation and decommissioning of the Scheme.

6.2 Meeting the Renewable Energy Need

Planning Policy Context

- 6.2.1 Parts 2 and 3 of both NPS EN-1 and Draft NPS EN-1 discuss the need for energy NSIPs. These explain the context and drivers for the identified nationally significant energy infrastructure need. At the time NPS-EN-1, NPS EN-3 and NPS EN-5 were designated in 2011, large scale solar development was not proven and therefore was not a technology identified as being required at a nationally significant scale. The draft Energy NPSs present a more up-to date position than the designated Energy NPSs, but both set out the same principles, which are:
- a. The need to secure adequate energy supply to accommodate projected increased national energy use;
 - b. The need to replace electricity generation capacity that will be decommissioned;
 - c. The need to reduce greenhouse gas emissions to meet decarbonisation commitments by 2050;
 - d. The need for more electricity capacity and resilience; and
 - e. The need to diversify energy supply and reduce reliance on imports of fossil fuels.
- 6.2.2 Both the designated and draft versions of NPS EN-1 (Ref. 3) set out the presumption in favour of granting consent to applications for energy NSIPs *“unless any more specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused.”*
- 6.2.3 Paragraphs 3.1.3 and 3.1.4 of NPS EN-1 (Ref. 3) also state that all applications for nationally significant energy infrastructure covered by the energy NPSs should be assessed on the basis that the need for such infrastructure has been demonstrated and that substantial weight should be given to the contribution that proposals would make towards meeting the identified energy infrastructure need. This is reiterated by paragraphs 3.2.5 and 3.2.6 of Draft NPS EN-1 (Ref. 2), which includes solar PV generation amongst the technologies covered by the suite of draft energy NPSs.

- 6.2.4 Most recently published in March 2023, draft NPS EN-1 (Ref. 2) and draft NPS EN-3 (Ref. 4) reflect the latest national policy with regard to energy security and the transition to net zero. Draft NPS EN-1 (Ref. 2) emphasises the commitment to net zero with reference to the Energy White Paper: Powering our net zero future (Ref. 20), British Energy Security Strategy (Ref. 17) and the Levelling up White Paper (Ref. 20) which all explain the Government's commitment to transition to low carbon energy production.
- 6.2.5 The British Energy Security Strategy (Ref. 17) specifically identifies an ambition of up to 70GW of solar by 2035 from roof and ground mounted installations. The Energy White Paper: Powering our net zero future (Ref. 20), published in December 2020, identifies that *"a low-cost, net zero consistent system is likely to be composed predominantly of wind and solar"* and that the increase in electricity demand through decarbonisation of other sectors means *"a four-fold increase in clean electricity generation with the decarbonisation of electricity increasingly underpinning the delivery of our net zero target"* is needed.
- 6.2.6 Paragraph 2.3.3 of Draft NPS EN-1 (Ref. 2) sets out that to ensure the supply of energy always remains secure, reliable, affordable, and consistent with meeting net zero carbon emissions by 2050 *"a step change in the decarbonisation of our energy system"* will be required.
- 6.2.7 Paragraph 3.3.20 of Draft NPS EN-1 (Ref. 2) sets out that, along with wind, the Government expects solar to form the majority of the generation capacity needed for a net zero, secure and cost-efficient energy system:
"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".
- 6.2.8 Whilst Draft NPS EN-1 paragraph 3.3.12 (Ref. 2) acknowledges the role that smaller scale developments play in helping to achieve the Government's objectives and commitments for the energy system, it explains that this alone will not be enough and that *"the government does not believe they will replace the need for new large-scale electricity infrastructure to meet our energy objectives"*. Paragraph 3.3.12 goes on to set out that large-scale centralised electricity generating facilities have numerous economic and other benefits, including the more efficient bulk transfer of power, which enables surplus generation capacity in one area to be used to cover shortfalls elsewhere.
- 6.2.9 The Climate Change Committee's progress report in June 2023 states that that *"To achieve the NDC [Nationally Determined Contribution – 2030] commitment of at least a 68% fall in territorial emissions from 1990 levels, the rate of emissions reduction outside the power sector must almost quadruple"* (Ref. 56).
- 6.2.10 To achieve extensive electrification and decarbonisation as well as meet growing demand there is a need for large scale renewable energy infrastructure to be urgently developed. The development of large scale solar is therefore needed to provide essential diversity to the low carbon generation portfolio. The Government's Powering Up Britain strategy, (March 2023) concludes that *"We need investment at scale ... to rapidly rollout*

existing technologies” (Ref. 37). Solar PV generation is an established and proven renewable energy technology. Solar developments at a nationally significant scale are able to be rapidly rolled out, in accordance with the urgent need established by this strategy.

- 6.2.11 NPS EN-1 paragraph 3.2.3 (Ref. 3) and Draft NPS EN-1 (Ref. 2) paragraph 3.1.2, do also acknowledge that: “...it will not be possible to develop the necessary amounts of such infrastructure without some significant residual adverse impacts.” This statement is present in most NPSs because it is rarely possible to deliver NSIPs without significant effects, due to their scale.
- 6.2.12 At the local level, both East Riding of Yorkshire Council and North Yorkshire Council have declared a climate emergency. Each authority supports action to address climate change through promotion and support of low carbon and renewable energy generation in appropriate locations if the residual harm of such development is outweighed by its wider benefits. This approach is set out in the following adopted and emerging climate change strategies and local plan policies - East Riding Local Plan 2012-2029 Strategy Document 2016 policies S2 and EC5 (Ref. 24), East Riding Local Plan Update 2020-2039 policies S2 and EC5 (Ref. 33), Selby District Core Strategy Local Plan, October 2013 policies SP15 and SP17(Ref. 28), Selby District Council Local Plan Publication Version Consultation 2022 policy SG10 (Ref. 34).
- 6.2.13 In summary, the urgent need for renewable energy infrastructure to address the causes of climate change is acknowledged at both local and national level. In particular, draft NPS EN-1, draft NPS EN-3 and other recent Government energy and climate change policy and evidence highlight the significant urgency of bringing forward renewable energy infrastructure and that actions to address this urgency need to be accelerated. The **Statement of Need [EN010143/APP/7.1]** explains this position in greater detail.

Appraisal

- 6.2.14 The Scheme’s principal objective is to generate a significant amount of low-carbon electricity for an operational period of 40 years. **Section 5** of this **Planning Statement [EN0101043/APP/7.2]** and the **Statement of Need [EN0101043/APP/7.1]** explain that the Scheme will deliver significant amounts of low carbon power in shorter timescales compared to other forms of energy generation infrastructure, since ground mounted solar developments are relatively quick to construct. Over its 40 year lifetime the Scheme is expected to generate 15.9 TWh. Therefore, the Scheme will contribute significantly and quickly to meeting the British Energy Security Strategy’s (April 2022) (Ref. 17) ambitions of 70GW of solar by 2035 and help to deliver the Government’s objectives and commitments for the development of a secure, affordable and low carbon energy system.
- 6.2.15 The environmental impacts of the Scheme have been assessed as reported in the **ES [EN0101043/APP/6.1-6.4]** and are discussed in this Planning Statement. Overall, with appropriate mitigation implemented, the Scheme is expected to have limited and localised residual significant adverse effects during its 40 year operation when considered relative to the large scale nature of the Scheme. These effects are therefore considered to be outweighed by the significant national benefits that the Scheme will provide. As explained further in this section of the Planning Statement, there are no

specific and relevant policies set out in the relevant NPSs which clearly indicate that consent should be refused.

- 6.2.16 In summary, the Scheme has a vital role to play in the UK's urgent response to tackle climate change. The Scheme is critical and will make a timely contribution to the decarbonisation, affordability and security of UK's energy supply. Any potential residual significant environmental effects are outweighed by the benefits of the Scheme, the contribution towards meeting the energy need being one of these key benefits. There are no policies which clearly indicate that consent should be refused.
- 6.2.17 The Scheme is therefore in compliance with the relevant national and local policies relating to the need for, and provision of, renewable energy infrastructure. Helping meet this established urgent need should weigh substantially in favour of the DCO being granted.

6.3 Good Design and Site Selection

Planning Policy Context

- 6.3.1 Section 4.5 of NPS EN-1 (Ref. 3) and 4.6 of Draft NPS EN-1 (Ref. 2) set out the principles for good design that are applicable for all energy infrastructure. Paragraph 4.6.2 of Draft NPS EN-1 states that:

“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.”

- 6.3.2 Paragraph 4.5.3 of NPS EN-1 (Ref. 3) also requires consideration of functionality and aesthetics as far as possible and notes that there may be opportunities for the applicant to demonstrate good design in terms of siting relative to existing landscape character, landform and vegetation. This is reiterated in Draft NPS EN-1 (Ref. 2) Paragraphs 4.6.10 to 4.6.13.
- 6.3.3 Draft NPS EN-1 (Ref. 2) paragraphs 4.6.5 to 4.6.7 encourages the use of design objectives and the appointment of a design champion to guide the design development from conception to operation. NPS EN-1 (Ref. 3) and Draft NPS EN-1 (Ref. 2) both expect applicants to provide details in their application of how the design process was conducted and how the design has evolved.
- 6.3.4 Draft NPS EN-3 (Ref. 3) provides specific design policies for solar development and recognises that there are a number of factors when considering the design and layout of large scale ground mounted solar sites. Section 3.10 identifies the key considerations for siting a solar farm and its design including grid capacity, orientation, topography and ability to mitigate environmental impacts and flood risk (paragraph 3.10.51). Paragraphs 3.10.10 to 3.10.39 specifically refer to factors influencing site selection and design. The factors identified are: irradiance and topography; proximity to dwellings; Agricultural Land Classification and land type; accessibility; public rights of way; security and lighting; and network connection. Technical considerations of solar farms including site capacity; site layout design and

appearance; project lifetime and decommissioning are referred to at paragraphs 3.10.41 to 3.10.60.

- 6.3.5 Draft NPS EN-3 at paragraph 3.10.8 also refers to land take for a solar farm stating it would “*typically require between 2-4 acres (approximately 0.8 to 1.6 hectares) for each MW of output. A typical 50MW solar will consist of around 100,000 to 150,000 panels and cover between 125 to 200 acres. It is however acknowledged that this may vary significantly depending on the site and the technology being adopted as this becomes more efficient over time*” (Ref. 4).
- 6.3.6 Paragraphs 3.10.61 to 3.10.62 of Draft NPS EN-3 (Ref. 4) discuss the need for flexibility in design. Paragraphs 2.2.1 to 2.2.8 of Draft NPS EN-5 consider factors influencing site selection and design for electrical infrastructure: “*There will usually be a degree of flexibility in the location of the development’s associated substations, and applicants should consider carefully their placement in the local landscape, as well as their design.*”
- 6.3.7 In terms of local policy, **Appendix B: Local Policy Accordance Tables** of this Planning Statement lists the relevant policies with regard to design. The adopted East Riding Local Plan (Ref. 24) and emerging East Riding Local Plan Update (Ref. 33), the Selby District Core Strategy (2013) (Ref. 28), and the Selby District Local Plan Publication Version (draft) (Ref. 34) all have policies seeking to ensure that proposals achieve high quality design, have regard to the local character and respond to the context of its surroundings.
- 6.3.8 In addition to planning policy, national design guidance is also of relevance and is referred to at paragraph 4.6.5 footnote 113 of draft NPS EN-1. The National Infrastructure Commission (NIC) in their Design Principles for National Infrastructure refers to four key pillars of good design including Climate, People, Place and Value (Ref. 57). The NIC recognise that design relates to both visual appearance and technical performance. In addition, the National Design Guide (January 2021) sets out the components of good design with 10 characteristics of well-designed places including context, movement, nature, uses and lifespan (Ref. 58). Local design guidance of relevance is the East Riding of Yorkshire Council Public Rights of Way and Planning Guidance Document (Ref. 59) which provides PRow design standards. The design policy and guidance context is also discussed in the **Design and Access Statement [EN010143/APP/7.3]**.

Appraisal

- 6.3.9 The Scheme design is the result of an iterative design process which delivers the Scheme’s functionality, which is to generate a large amount of renewable electricity using single axis tracker solar technology, whilst addressing the local context and setting within which it is located. The Applicant’s design team has worked collaboratively to provide an integrated and responsive design which has been informed by the process of environmental impact assessment, statutory consultation and stakeholder engagement. As set out in the **Design and Access Statement [EN010143/APP/7.3]** design objectives have guided the design response from an early stage to develop a good design that balances the need to maximise renewable energy generation from the Scheme, whilst minimising potential adverse impacts and providing mitigation and enhancement measures where practicable. This has included:

- a. developing a landscape design which carefully integrates the Scheme into its landscape setting to reduce the visibility of the Scheme and its impact on the landscape as far as practicable.
 - b. Increasing the biodiversity value of the Solar PV Site and other areas of the Order limits for the purposes of mitigation and enhancement.
 - c. Improvements to the connectivity of PRow through the provision of permissive paths within the Solar PV Site.
- 6.3.10 The Applicant has made design decisions responding to the outcomes of statutory consultation, technical feedback as well as ongoing fieldwork and desk based analysis. The evolution of the Scheme's design is summarised in **Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010142/APP/6.1]** and within the **Design and Access Statement [EN010142/APP/7.3]**. The landscape and ecological design for the Scheme is further explained in the **Framework Landscape and Ecological Management Plan** and the design of permissive paths in the **Public Rights of Way Management Plan [EN010142/APP/7.13]**.
- 6.3.11 The Applicant is seeking flexibility in its proposed design as discussed in **Chapter 2: The Scheme, ES Volume 1 [EN010142/APP/6.1]** because a detailed design process will need to follow if the DCO is granted to ensure the Scheme can make best use of the latest technology and construction methods. The EIA has therefore been undertaken assessing the maximum (and where relevant, minimum) parameters for the Scheme where flexibility is required. The **Outline Design Principles Statement [EN010131/APP/2.3]** details the design principles which will provide a framework within which the detailed design can be developed. This Statement will be secured by the DCO and provides certainty that the Scheme design can be delivered to avoid and mitigate adverse environmental effects whilst maximising benefits of the design.
- 6.3.12 The Applicant has also undertaken a considered approach to site selection and design. This is explained in **Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010142/APP/6.1]** which shows how the site selection and design factors set out in paragraphs 3.10.10 to 3.10.39 of Draft NPS EN-3 (Ref. 4) are met. **Chapter 2: The Scheme, ES Volume 1 [EN010142/APP/6.1]** and section 6 of the **Statement of Need [EN010142/APP/6.1]** details how the Scheme meets the technical considerations set out in paragraphs 3.10.41 to 3.10.60 (Ref. 2). The following provides a summary of how these considerations are met by the Scheme:
- a. Irradiance and topography – the Applicant's site selection process demonstrates that land was identified for the Solar PV Site within an area of good solar irradiance and a relatively low lying and flat landscape to maximise generation of energy.
 - b. Proximity to Dwellings – the Applicant has sought to avoid urban areas in selecting the Solar PV site and incorporate buffers from residential dwellings within the Scheme's layout.
 - c. Agricultural land classification – the Applicant's site selection process demonstrates that the use of BMV land was minimised by targeting non BMV land. The majority of land within the Order limits is agricultural land which is not classified as best and most versatile.

- d. Accessibility – the Applicant’s site selection process considered the potential for HGV access, with preference for good access to the strategic and local road network.
- e. Public Rights of Way (PRoW) – the Applicant has sought to avoid land which is crossed by PRoW and where this has not been possible consideration has been given to including sufficient buffers to ensure they are maintained during the construction, operation and decommissioning as set out in the **Framework Public Rights of Way Management Plan [EN010142/APP/7.13]**. Improvements to the connectivity of the existing PRoW are proposed through the provision of permissive paths the design of which will accord with the East Riding of Yorkshire Council’s PRoW design standards (Ref. 59).
- f. Security and lighting - proposed fencing has been designed to minimise its visual prominence and during operation, areas of solar PV will not require artificial lighting other than during temporary periods of maintenance/repair. Pole mounted internal facing closed circuit television (CCTV) systems are proposed around the perimeter of the operational areas of the Solar PV Site. These will not require lighting and will use infrared technology at night.
- g. Network Connection – The Applicant undertook a search of available capacity within East Yorkshire and North Yorkshire and following discussions with National Grid secured a Point of Connection (POC) at National Grid’s Drax Substation. The location of the Order limits was therefore informed by availability of the POC at Drax with suitable capacity for export of renewable energy generated.
- h. Site Capacity – the operational requirements needed for the east-west single axis tracker solar technology proposed and environmental mitigation measures required have determined the generating capacity of the Solar PV Site. As the Scheme delivers the east-west single axis tracker solar technology this has a greater land take than the 2 to 4 acres per MW, specified by draft NPS EN-3 at paragraph 3.10.8, to allow spacing between panel arrays to avoid shading. This is considered appropriate to maximise energy generation from this type of solar technology.
- i. Site layout design and appearance – the panel array layout and appearance of the proposed east-west single axis tracker technology described in **Chapter 2: The Scheme, ES Volume 1 [EN010142/APP/6.1]** and illustrated on **Figure 2-3 ES Volume 3 [EN010142/APP/6.3]** provides an efficient arrangement to maximise electricity generation whilst avoiding and minimising environmental effects. Underground cabling is proposed to reduce visual impacts.
- j. Project lifetime – the Applicant is proposing a 40 year operational design life of the Scheme which is typical for solar farms.
- k. Decommissioning – the Applicant is proposing to decommission the Scheme after 40 years and has provided an appropriate framework of design control measures in the **Framework Decommissioning Environmental Management Plan [EN010142/APP/7.9]**

6.3.13 In summary, the Scheme delivers good design, meeting the requirements of the NPSs and draft NPSs in the context of efficiently delivering large scale

renewable energy infrastructure where it is recognised in national policy that the extent to which a scheme can contribute to the enhancement of the quality of the area is limited. The Scheme design does however deliver biodiversity enhancements; improved connectivity of PRoW within the Solar PV Site and proposes a landscape design which is sensitive to its context. The location and design of the Scheme accords with the considerations set out in Draft NPS EN-3 for large scale solar development and delivers high quality solar development design that has responded to the context of its surroundings in accordance with local policies.

6.4 Climate Change

Planning Policy Context

- 6.4.1 Legislation and policy relating to the need to decarbonise the UK's energy generation system to meet its climate change legal obligations are discussed in Section 5 and 6.2 of this Planning Statement and are not repeated here.
- 6.4.2 NPS EN-1 (paragraphs 4.8.5 to 4.8.8) (Ref. 3) and draft NPS EN-1 (paragraph 5.3.4) (Ref. 2) require consideration of the impacts of climate change on a development and a greenhouse gas (GHG) assessment to ensure that the appropriate mitigation and adaptation measures are incorporated. 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.
- 6.4.3 NPS EN-1 paragraph 4.8.5 (Ref. 3) also expects applicants to consider the impacts of climate change "*when planning the location, design, build, operation and where appropriate decommissioning of the new energy infrastructure*". Paragraph 2.4.1 and 2.4.2 of NPS EN-5 and paragraph 2.3.1 to 2.3.3 of draft NPS EN-5 (Ref. 15) advise that with regard to electricity infrastructure the resilience of the project to climate change should be assessed in the ES and set out how it would be resilient to flooding, with reference to substations.
- 6.4.4 Draft NPS EN-1 paragraph 4.9.11 (Ref. 2) expects developments to demonstrate 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*". In particular for solar development, draft NPS EN-3 (Ref. 4) expects applicants to consider how plant will be resilient to increased risk of flooding; and the impact of higher temperatures.
- 6.4.5 As discussed in section 6.2 of this Planning Statement, East Riding of Yorkshire Council and North Yorkshire Council have declared a climate emergency. Policy S2 of the East Riding Local Plan (Ref. 24) and Local Plan Update 2020-2039 (Ref. 33), Policy SP15 of the Selby District Core Strategy Local Plan Oct 2013 (Ref. 28), and Policy SG1, and IC1 of the Selby District Council Local Plan Publication Version Consultation 2022 (Ref. 34) would support developments that achieve a reduction in greenhouse gas emissions and contribute to climate change mitigation. They also support developments that include measures to adapt to the expected impacts of climate change. Local policies also seek to ensure that developments incorporate climate change resilience in their design (Policy ENV1 of the East Riding Local Plan (Ref. 24) and Local Plan Update 2020-2039 (Ref. 33), Policy SG9 Selby

District Council Local Plan Publication Version Consultation 2022 (Ref. 34)). Policy NE5 of the Selby District Council Local Plan Publication Version Consultation 2022 (Ref. 34) also supports proposals that consider opportunities to mitigate for climate change or flooding.

Assessment Conclusions

- 6.4.6 A GHG assessment has been undertaken and **Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1]** presents the findings of the likely significant effects of the Scheme in relation to climate change. The GHG assessment concludes that the Scheme will have a significant beneficial effect during its 40 year operation.
- 6.4.7 The GHG impact of the construction and decommissioning stages of the Scheme are anticipated to result in minor adverse effects on climate change which are not significant when taking into consideration the measures proposed in the **Framework Construction Environmental Management Plan [EN010143/APP/7.7]** and **Framework Decommissioning Environmental Management Plan [EN010143/APP/7.9]**
- 6.4.8 With regard to GHG during operation, effects are significant beneficial due to the operational carbon intensity remaining below that of a gas fired generating facility throughout its lifetime and the Scheme's role in achieving the rate of transition to low carbon energy generation required by nationally set policy commitments supporting the move towards net zero.
- 6.4.9 Across the Scheme's lifecycle the assessment concludes there will be an indirect reduction in atmospheric GHG concentration and avoidance of emissions. The total lifetime emissions saving of the Scheme would equate to 240,191 tonnes of carbon dioxide. Furthermore, **Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1]** acknowledges that it is likely that the land use change associated with the conversion of arable land to grassland during its 40 year operation would have a beneficial GHG impact as grassland has a higher carbon sequestration value than cropland.
- 6.4.10 A Climate Change Resilience Assessment (CCRA) has been undertaken for the Scheme which assesses the resilience of the Scheme to projected future climate change impacts. The CCRA uses UK Climate Projections 2018 (UKCP 2018) data (the most up to date) to determine the future baseline conditions and assess the risks associated with gradual climate change and an increased frequency of extreme weather events. Section 6.6 of **Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1]** outlines adaptation measures that have been incorporated into the Scheme design and measures that are proposed for the management of the construction and decommissioning phases through the CEMP and DEMP to increase the resilience of the Scheme to climate change. These include having a flood resistant and resilient design with the location of vulnerable infrastructure such as the Grid Connection Substations and Field Stations outside areas of high flood risk, the positioning of panels at angles and heights sufficiently above predicted flood levels as well as the inclusion of compensation flood storage areas as detailed within **Appendix 9.3 Flood Risk Assessment, ES Volume 2 [EN010143/APP/6.2]**. The CCRA concludes with design measures proposed in place climate change risks on the Scheme during construction, operation and decommissioning are not significant.

6.4.11 The In Combination Climate Change Impact (ICCI) Assessment (**Appendix 6-3, ES Volume 2 [EN010143/APP/6.2]**) assesses future climate projections and the sensitivity of receptors to both climate change and the Scheme. This concludes that with the implementation of the Scheme design and measures that are proposed for the management of the construction and decommissioning phases through the CEMP and DEMP, all ICCIs during the construction, operation and decommissioning phases have been identified to be not significant.

Appraisal

6.4.12 The significant GHG savings achieved throughout the lifetime of the Scheme demonstrate the role solar energy generation has to play in the transition to, and longer-term maintenance of, a low carbon energy system and economy. The Scheme directly supports the UK policy of decarbonising electricity generation therefore according with the NPS EN-1 and draft NPS EN-1 and recent Government energy and climate change policy and legislation referred to in section 2.7, 5 and 6.2 of this Planning Statement.

6.4.13 The Scheme's design and measures that are proposed for the management of the construction and decommissioning phases will ensure the Scheme has resilience to climate change risks in the future and therefore deliver a robust energy facility for 40 years.

6.4.14 In summary, the Scheme's significant beneficial carbon savings during operation and its proposed design and control measures during all phases of the Scheme demonstrates the Scheme's compliance with climate mitigation and adaptation policies set out in national and local planning policy. This weighs in favour of granting the DCO.

6.5 Landscape and Visual Impact

Planning Policy Context

6.5.1 Section 5.9 of NPS EN-1 (Ref. 3) sets out the landscape and visual considerations for energy projects. Paragraphs 5.9.5 to 5.9.7 require the applicant to undertake a landscape and visual impact assessment which includes an assessment of the effects during construction and operation on landscape components and landscape character. During construction, an assessment of visibility and conspicuousness of the project is required. During operation, an assessment of the presence of the project is required including any impacts on views and visual amenity.

6.5.2 Paragraphs 5.9.8 of NPS EN-1 (Ref. 3) explain that landscape effects *“depend on the existing character of the local landscape, its current quality, how highly it is valued and its capacity to accommodate change”* and *“these factors need to be considered in judging the impact of a project on landscape”*.

6.5.3 Draft NPS EN-1 5.10.5 (Ref. 3) states that *“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”*.

6.5.4 NPS EN-1 paragraph 5.9.15 (Ref. 3) and Draft NPS EN-1 paragraph 5.10.34 (Ref. 2) state that outside of designated landscapes, the decision maker 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.”* Paragraphs 5.9.16 of NPS EN-1 (Ref. 3) and 5.10.35 of Draft NPS EN-1 (Ref. 2) direct the decision maker to *“take account of whether any adverse impact is temporary and/or is capable of being reversed in a reasonable timescale”*.
- 6.5.5 NPS EN-1 at paragraph 5.9.14 (Ref. 3) and draft NPS EN-1 paragraph 5.10.16 (Ref. 2) expect the Applicant to consider relevant local planning policies which have been based on landscape character assessments.
- 6.5.6 NPS EN-1 paragraph 5.9.22 (Ref. 3) and draft NPS EN-1 paragraph 5.10.26 (Ref. 2), state: *“Within a defined site, adverse landscape and visual effects may be minimised through appropriate siting of infrastructure within that site, design including colours and materials, and landscaping schemes, depending on the size and type of the proposed project. Materials and designs of buildings should always be given careful consideration.”*
- 6.5.7 NPS EN-1 (Ref. 3) paragraph 5.9.17 and Draft NPS EN-1 paragraph 5.10.36 (Ref. 2) set out that the decision maker 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 reasonable mitigation.”*
- 6.5.8 With regard to visual effects, NPS EN-1 paragraph 5.9.18 (Ref. 3) and Draft NPS EN-1 paragraph 5.10.12 and 5.10.13 (Ref. 2) state that *“All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites.”* They go on to state that the decision maker *“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.”*
- 6.5.9 The adopted East Riding Local Plan (Ref. 24) and emerging East Riding Local Plan Update (Ref. 33), the Selby District Core Strategy (2013) (Ref. 28), and the Selby District Local Plan Publication Version (draft) (Ref. 34) all have policies expecting development proposals to be sensitively integrated into the existing landscape, demonstrate an understanding of the intrinsic qualities of the landscape setting and, where possible, seek to make the most of the opportunities to protect and enhance landscape characteristics and features. These include Policy EC1, EC5, ENV1, ENV2, and ENV3 of the East Riding Local Plan, Policy EC5, ENV1, ENV2, and ENV3 of the emerging East Riding Local Plan Update. They also include Policy ENV13 and ENV15 of the Selby District Local Plan, Policy SP18 of the Selby District Core Strategy, and Policy SG9, SG10, and EM4 of the Selby District Local Plan Publication Version.

Assessment conclusions

Landscape impact assessment

- 6.5.10 **Chapter 10: Landscape and Amenity, ES Volume [EN010143/APP/6.1]** identifies that the Scheme is not located within any national, regional or locally designated landscapes. The assessment of the impact of Landscape Character Areas (LCA) concludes that there will be no significant adverse effects upon the national and regional level LCAs within which the Scheme is located, with only minor adverse effects which are not significant predicted at Year 1 of operation.

- 6.5.11 Significant adverse effects are predicted for Local Landscape Character Areas (LLCA) Howden to Bubwith 5a and West of Holme on Spalding Moor Farmland 5b characterised in East Riding of Yorkshire Landscape Character Assessment (Ref. 49) at Year 1 of operation. The assessment concludes that the introduction of new infrastructure will locally represent a comprehensive change to the overall perceptual character of these LLCAs.
- 6.5.12 At Year 15 of operation, when the landscape design is more established, significant adverse effects would remain only for LLCA 5a due to the prominent change to key characteristics within this LCA with the effects upon LLCA 5b being reduced to minor adverse as planting is more established. Requirement 18 of the **draft DCO [EN010143/APP/3.1]** limits the operational period of the Scheme to 40 years and therefore these effects on the LLCAs are reversible.
- 6.5.13 With regard to construction and decommissioning, the assessment concludes none of the national, regional or local LCAs will experience significant adverse effects during these periods. During construction adverse effects are predicted to be minor upon the local LCAs within which the Scheme is located due to the introduction of machinery and materials which will degrade the condition of the landscape locally and result in a reduction in tranquillity. These effects are temporary and short term.

Visual impact assessment

- 6.5.14 **Chapter 10: Landscape and Visual Amenity, ES Volume 1 [EN0101043/APP/6.1]** assesses the visual impacts of the Scheme. Through consultation with the relevant stakeholders, 29 viewpoints were chosen to illustrate the typical range of views of the Scheme as experienced from settlements, publicly accessible roads, and PRow towards the Scheme. These representative viewpoints are illustrated on **Figure 10-7: Representative Viewpoint Locations Plan, ES Volume 3 [EN0101043/APP/6.3]**.
- 6.5.15 The Scheme has been designed to minimise its visual impact. The landscape design which is discussed above and in the **Design and Access Statement [EN010143/APP/7.3]**; in section 10.6 of **Chapter 10: Landscape and Visual Amenity, ES Volume 1 [EN0101043/APP/6.1]** and within the **Framework LEMP [EN010143/APP/7.14]** achieves this.
- 6.5.16 The assessment concludes that, with the mitigation proposed as part of the Scheme's design, during operation (Year 1), 10 of the Viewpoints (3, 4, 5, 6, 7, 10a, 10b, 11, 14 and 19) and users of the Howden 20 long distance route will experience significant adverse effects, By operation Year 15 these effects are reduced to minor adverse and therefore not significant as a result of the establishment of the proposed mitigation, enhancement and replacement planting and the management of existing hedgerow. Requirement 18 of the **draft DCO [EN010143/APP/3.1]** limits the operational period of the Scheme to 40 years and therefore the effects on visual receptors are reversible.
- 6.5.17 Significant adverse effects are predicted for visual receptors during construction and decommissioning.

- 6.5.18 During construction, 14 of the 30 viewpoints are anticipated to experience significant adverse short-term effects on visual amenity. Significant adverse effects are predicted to occur for:
- Residential receptors at Viewpoints 1, 3, 5, 6, 7, 11, 14, 19, 21;
 - PRoW/recreational users at Viewpoints 4, 10a, 10b, 11, 21, 22, 29; and
 - Road users at Viewpoints 10a.
- 6.5.19 This is largely due to construction related activity such as erection of boundary fencing, piling and the installation of solar PV panels and excavation and materials storage being visible. These effects are temporary and short term.
- 6.5.20 During decommissioning, significant adverse visual amenity effects are predicted for residential receptors at Viewpoints 1 and 21 and for PRoW users at viewpoints 10b, 21, 22 and 29 due to the visibility of the removal of solar PV infrastructure and movement of vehicles at these locations. These effects are temporary and short term.

Appraisal

- 6.5.21 The Applicant has sought to minimise harm to the landscape and reduce adverse visual effects. This has been achieved through a carefully designed Scheme which generates a large amount of renewable electricity, using single axis tracker solar technology, whilst also responding to its local context, integrating the Scheme into its landscape setting, in accordance with national and local planning policies.
- 6.5.22 **Chapter 10: Landscape and Amenity, ES Volume [EN010143/APP/6.1]; the Framework LEMP [EN010143/APP/7.14] and the Design and Access Statement** explain the principles used to develop the landscape design for the Scheme. These include:
- Siting the tallest elements of the Scheme, the Grid Connection Substations, in Solar PV Area 1c which is a small field that provides visual containment via a robust boundary of hedgerow and mature trees in order to maximise screening of the infrastructure.
 - Creation of new green infrastructure elements and corridors throughout the Solar PV Site, to increase habitat connectivity, enhance landscape condition and improve visual amenity within sometimes degraded agricultural landscapes. This includes provision of semi-improved and species-rich grassland beneath the solar panel areas and within the wider Solar PV Site. Grassland habitats will be created to provide a corridor connecting Willitoft and Gribthorpe whilst allowing for separation between the Solar PV Areas on the approach to Gribthorpe. Land adjacent to the River Foulness has been identified as one of the most appropriate areas to deliver mitigation and enhancement within the Order limits and will be utilised to deliver ecological mitigation.
 - Offsets from properties and local roads within proximity to the Solar PV Areas have been provided to respond to the existing character of views, or where views and open character contribute to the setting of local villages. Where longer views from sensitive receptors are available, wider offsets have been afforded.

- d. Offsets to PRow throughout the Scheme have been carefully considered to reflect the existing character of the routes.
- e. Locating operational office, welfare and storage facilities where existing dilapidated buildings are currently at Johnsons Farm.
- f. The proposed cables in the Interconnecting Cable Corridor and the Grid Connection Corridor will be underground, thereby avoiding the introduction of new tall linear features into the landscape, which would increase the extent of the Scheme's visibility.
- g. Protection of existing vegetation features. Where required, hedgerows will be repaired and enhanced across the Scheme and additional tree planting provided as set out in the **Framework LEMP [EN010143/APP/7.14]**.

6.5.23 The above landscape design principles form the embedded design considered as part of the landscape and visual impact assessment and reduce the landscape and visual effects of the Scheme as far as practicable.

6.5.24 With the exception of the effect on LLCA Howden to Bubwith 5a, significant adverse landscape and visual effects predicted at Year 1 of operation are anticipated to reduce to a level that is not significant by Year 15 of operation, following the establishment of the landscape planting and management of existing hedgerow. All operational effects will be reversed following 40 years of operation as secured by requirement 18 of the **draft DCO [EN010143/APP/3.1]** and significant adverse landscape and visual effects identified during the construction and decommissioning phases are short term and temporary.

6.5.25 In summary, the Scheme will result in limited and localised adverse landscape and visual effects which will reduce over the period of its operation and will be reversible. There are substantial benefits of the Scheme, as set out in **Section 5 of this Planning Statement [EN010143/APP/7.2]** and therefore it is considered that the limited and localised residual landscape and visual effects of the Scheme are clearly outweighed by these benefits of the Scheme, particularly the national benefit of delivering large scale renewable energy infrastructure which is urgently needed in order to create a secure and affordable energy system and to help combat climate change.

6.5.26 Therefore, the Scheme accords with relevant policy relating to landscape and visual amenity in the NPS and draft NPS and has taken account of the existing character and sensitivity of landscapes to accommodate energy development as set out in local policy.

6.6 Flood Risk and Drainage

Planning Policy Context

Flood risk to and from development and drainage

6.6.1 Paragraphs 5.7.24 and 5.7.25 of NPS EN-1 (Ref. 3) require *“Essential energy infrastructure which has to be located in flood risk areas should be designed to remain operational when floods occur”* and that the *“receipt of and response to warnings of floods is an essential element in the management of the residual risk of flooding”*. Draft NPS EN-1 paragraph

- 5.8.41 (Ref. 2) states that that essential energy infrastructure within flood zone 3b *“should only be consented if the development will not result in a net loss of floodplain storage, and will not impede water flows.”*
- 6.6.2 Draft NPS EN-1 at paragraph 5.8.36 (Ref. 2) expects applicants to demonstrate to the satisfaction of the Secretary of State that *“in flood risk areas the project is designed and constructed to remain safe and operational during its lifetime, without increasing flood risk elsewhere”*. It also expects the project to include safe access and escape routes where required. Paragraph 5.8.17 of Draft NPS EN-1(Ref. 2) requires developments including their construction works 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”* to ensure access is retained and their standard of protection is not reduced.
- 6.6.3 With regard to drainage, NPS EN-1 paragraph 5.7.19 (Ref. 3) explains the range of sustainable approaches to surface water drainage management. Paragraph 5.7.21 requires *“surface water drainage arrangements for any project to be such that the volumes and peak flow rates of surface water leaving the site are no greater than the rates prior to the proposed project, unless specific off-site arrangements are made and result in the same net effect”*.
- 6.6.4 Paragraph 5.7.22 of NPS EN-1 (Ref. 3) also states that 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”*.
- 6.6.5 Draft NPS EN-1 paragraph 5.8.36 (Ref. 2) expects applicants to demonstrate to the Secretary of State that SuDS have been designed into the Scheme and provide clear evidence that their use would be inappropriate if they are not to be used. Paragraph 5.8.27 requires the surface water drainage arrangements for any project to account *“for the predicted impacts of climate change throughout the development’s lifetime”* and ensure *“volumes and peak flow rates of surface water leaving the site are no greater than the rates prior to the proposed project, unless specific off-site arrangements are made and result in the same net effect”*.
- 6.6.6 Policies S2 and ENV6 of the East Riding Local Plan (Ref. 24) and East Riding Local Plan Update (Ref. 33) require the consideration of Sustainable Urban Drainage Systems (SuDs) for developments at risk of flooding.
- 6.6.7 Policies EC5, ENV1 and ENV 6 of the East Riding Local Plan (Ref. 24), and East Riding Local Plan Update (Ref. 33) seek to ensure that flood mitigation is incorporated into proposals, and that flood risk is managed by applying the Sequential and Exception Tests. This is also reiterated by Policy SP15 of the Selby District Local Plan (Ref. 29), and Policies SG9, SG11 and NE5 of the Selby District Local Plan Publication Version (Ref. 34). Policy A4 of the East Riding Local Plan (Ref. 24) and East Riding Local Plan Update (Ref. 33) seeks to protect the Goole and Humberhead Sub Level area from flood risk.

Sequential Test

- 6.6.8 The application of the Sequential Test is set out in Paragraph 5.7.13 of NPS EN-1 (Ref. 3), whereby *“preference should be given to locating projects in*

Flood Zone 1. If this is not reasonably available, then consideration can be given to Flood Zone 2 and subsequently to Flood Zone 3 subject to the Exception Test. The Sequential Test is explained in draft NPS EN-1 at paragraph 5.8.9 (Ref. 3) which has a footnote (211) referencing the NPPF's Planning Practice Guidance (PPG) flood risk section (paragraph 023 Reference ID: 7-023-20220825 to paragraph: 030 Reference ID: 7-030-20220825) to provide guidance as to how the sequential test should be applied (Ref. 60). Paragraph 5.8.6 of draft NPS EN-1 (Ref. 3) states that the aim of the Sequential Test is to ensure that *"flooding from all sources is taken into account and at all stages in the planning process to avoid inappropriate development in areas at risk of flooding and steer development to areas at lowest risk of flooding"*. In determining the application the Secretary of State should be satisfied that the Sequential Test has been applied as part of site selection and that a sequential approach has been applied at the site level to minimise risk by directing the most vulnerable uses to the areas of lowest flood risk (paragraph 5.8.36).

- 6.6.9 Draft NPS EN-1 (Ref. 2) explains that the Sequential Test ensures that *"a sequential and risk based approach is followed to steer development to new development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account"* (Paragraph 5.8.21). It continues that where it is not possible to use 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. Paragraph 5.8.23 (Ref. 2) expects the consideration of alternative sites to be undertaken with reference to Section 4.2 of draft NPS EN-1 (Ref. 2) which, amongst other things, requires the consideration of alternatives to be undertaken in a proportionate manner and only consider those alternatives which can meet the objectives of the Scheme.
- 6.6.10 Draft NPS EN-1 (Ref. 2) states that *"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"* (paragraph 5.8.29).
- 6.6.11 The PPG reiterates that all forms of flood risk (including groundwater flooding, reservoir flooding and surface water flooding) need to be treated consistently with river (fluvial) and tidal flooding in mapping probability and accessing vulnerability, so the Sequential Test is applied across all areas of flood risk (Ref. 60).
- 6.6.12 The East Riding of Yorkshire SPD on Flood Risk Sequential and Exception Test (2021) (Ref. 31) also reiterates the approach to the Sequential Test as set out in the NPS EN-1 (Ref. 3) and Draft NPS EN-1(Ref. 2). It aligns with the guidance as set out in the PPG and in paragraph 3.5 states that *"if a Sequential Test is applicable to the development proposal, applicants are required to assemble the relevant information within their planning application to enable the Council to assess whether the Sequential Test has been satisfactorily undertaken. The Council will need evidence of:*
- a. *The area of search that has been used to assess alternative sites:*
 - b. *The alternative sites identified within the area of search; and*

- c. *Assessment and explanation of whether alternative sites are at a lower flood risk and are reasonably available.”*

Exception Test

- 6.6.13 NPS EN-1 (Ref. 3) states in paragraph 5.7.12 that the Secretary of State should not consent development in Flood Zone 3 unless it is satisfied that the Sequential and Exception Test requirements have been met. Paragraph 5.7.14 also states that *“If, following application of the sequential test, it is not possible, consistent with wider sustainability objectives, for the project to be located in zones of lower probability of flooding than Flood Zone 3 or Zone C, the Exception Test can be applied. The test provides a method of managing flood risk while still allowing necessary development to occur”*.
- 6.6.14 Paragraph 5.7.16 (Ref. 3) states that *“All three elements of the test will have to be passed for development to be consented. For the Exception Test to be passed:*
- a. *it must be demonstrated that the project provides wider sustainability benefits to the community that outweigh flood risk;*
 - b. *the project should be on developable, previously developed land or, if it is not on previously developed land, that there are no reasonable alternative sites on developable previously developed land subject to any exceptions set out in the technology-specific NPSs; and*
 - c. *a FRA must demonstrate that the project will be safe, without increasing flood risk elsewhere subject to the exception below and, where possible, will reduce flood risk overall.”*
- 6.6.15 The Exception Test in the draft NPS EN-1 (Ref. 3) the NPPF (Ref. 18) removes reference to previously developed land. Draft NPS EN-1 at paragraph 5.7.16 (Ref. 2) still however requires the following to be demonstrated:
- a. *The project would provide wider sustainability benefits to the community that outweigh the flood risk; and*
 - b. *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”*.
- 6.6.16 Paragraph 5.7.16(a) of Draft NPS EN-1(Ref. 2) includes footnote 116, which expects benefits to include those set out in Part 3 of the draft NPS EN-1, which is focused on the need for new NSIPs.

Assessment Conclusions

- 6.6.17 The majority of the Scheme is situated within areas with the lowest risk of flooding from any source, however there are certain parts of the Scheme that are proposed to be located in Flood Zones 2, 3a and 3b, including whole Solar PV Areas within Flood Zone 2.
- 6.6.18 **Appendix 9-3 Flood Risk Assessment, ES Volume 2 [EN010143/APP/6.2]** presents an assessment of the risk of flooding to and from the Scheme, from all sources for flooding where these are relevant. The **Flood Risk Assessment (FRA), Appendix 9-3, ES Volume 2 [EN010143/APP/6.2]** demonstrates how residual flood risk will be managed during construction, operation and decommissioning of the Scheme and how the requirements of

- the Sequential Test and Exceptions Test are satisfied. The FRA is supported by Annexes A and B which provide details of the hydraulic modelling undertaken of the River Derwent, Annex A the modelling method statement was agreed with the Environment Agency in June 2023. Annex C of the FRA provides evidence to show how the Applicant meets the Sequential Test.
- 6.6.19 The **FRA (Appendix 9-3, ES Volume 2 [EN010143/APP/6.2])** concludes that during construction and decommissioning, to prevent an increase in flood risk to vulnerable receptors, temporary mitigation measures will be implemented as part of the CEMP and DEMP which are secured by requirements of the DCO (see Schedule 2 of the **draft DCO [EN010143/APP/3.1]**). The proposed measures are set out in the **Framework CEMP [EN010143/APP/7.7] and Framework DEMP [EN010143/APP/7.9]**.
- 6.6.20 The assessment of flood risk during the operational stage of the Scheme concludes that, with design mitigation, the risk to and from the Scheme from all sources of flooding would be low taking climate change into account. Design mitigation measures will be secured through the DCO as part of the Operational Environmental Management Plan (OEMP) to prevent an increase in flood risk to vulnerable receptors from the Scheme. The proposed measures are set out in the **Framework OEMP [EN010143/APP/7.8]** and include solar PV panels and Field Stations raised to appropriate levels above ground level in Flood Zones 2 and 3; solar PV panels being set horizontal when a flood alert is received; and small areas of flood plain compensation.
- 6.6.21 **Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 [EN010143/APP/6.1]** assesses flood risk and drainage in the context of EIA. This concludes that with proposed temporary mitigation measures implemented as part of the CEMP and DEMP there are no significant adverse effects predicted upon receptors with regard to flood risk during construction or decommissioning phases of the Scheme. Given design mitigation secured through the OEMP, there are no significant adverse effects predicted upon receptors with regard to flood risk during the operation of the Scheme.
- 6.6.22 A **Framework Surface Water Drainage Strategy, Appendix 9-4, ES Volume 2 [EN010143/APP/6.2]** has been prepared detailing appropriate surface water drainage management for the Scheme to avoid increased flood risk from surface water by ensuring volumes and peak flow rates of surface water leaving the Site are no greater than the rates prior to the proposed Scheme being implemented. Following agreement with the Ouse and Humber Internal Drainage Board (IDB), drainage requirements for the Scheme were limited to the Grid Connection Substations. A detailed Surface Water Drainage Strategy is secured through requirement 9 of the **draft DCO [EN010143/APP/3.1]**.

Appraisal

Sequential Test

- 6.6.23 A sequential approach has been applied in selecting the land for the Scheme and to the layout and design of the solar infrastructure within the Solar PV Site. The Scheme is located, as far as possible, in areas with the lowest risk of flooding from any source.

- 6.6.24 The location of the Solar PV Site has been selected on the basis of a range of factors which are discussed in more detail in **Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1]**. The Sequential Test Report provided at Annex C of the FRA (**Appendix 9-3, ES Volume 2 [EN010143/APP/6.2]**) explains the site selection criteria, the staged process of identifying an area of search and assessing the availability and suitability of areas of land at lower risk of flooding that have been considered. The Sequential Test Report concludes that reasonably available alternative sites in Flood Zone 1 within the area of search have not been identified for the Solar PV Site and the land that is available and suitable at lower risk of flooding is already within the Solar PV Site.
- 6.6.25 A sequential approach has also been applied to the layout and design of the solar infrastructure within the Solar PV Site whereby the two Grid Connection Substations, most Field Stations, and the majority of the solar PV panels are located in areas with the lowest risk of flooding from any source. There are limited areas where solar PV panels and Field Stations are located within Flood Zone 2. Furthermore, a limited number of solar PV panels, within the Solar PV Site, are located in Flood Zone 3. As discussed above appropriate mitigation is proposed for infrastructure in the areas of highest flood risk.
- 1.1.1 In terms of other elements of the Scheme, the Interconnecting Cable Corridors will accommodate the cabling required to transfer electricity between the inverters/transformers/switchgears at the Field Stations and the Grid Connection Substations in Solar PV Area 1c and Solar PV Areas together. The selection of these corridors has therefore been primarily based on the technical requirement for the cable routing to be a direct route between the Solar PV Areas themselves and the Grid Connection Substations to avoid losses in transmission. Interconnecting Cable Corridors for Solar PV Areas 2a, 2c and 2d are therefore located within Flood Zone 2.
- 6.6.26 Alternative corridors which would avoid Flood Zones 2 and 3 would not provide a direct route between the Solar PV Areas themselves and the Grid Connection Corridor. For Solar PV Area 2a an alternative route avoiding Flood Zone 2 would require a route to the north and then east travelling to the south of Willitoft. This would require several road and PRow crossings and would not have the potential benefit of co-locating Interconnecting Cables and Grid Connection Cables in the same trench along the Grid Connection Corridor which the proposed Interconnecting Cable Corridor links into. For the Interconnecting Cable Corridor between Solar PV Area 2c and Solar PV Area 2d an alternative route avoiding Flood Zone 2 would require crossing a PRow and either Spaldington Golf Course or the anaerobic digestion plant and wind turbine development to the east. Given the land use constraints, these alternatives were not therefore considered by the Applicant further. There are no reasonably available alternatives for the Interconnecting Cable Corridors.
- 6.6.27 Some Site Accesses, required to facilitate construction and operational access for the Scheme, are located within Flood Zone 2. It is not possible to locate these accesses in areas at a lower risk of flooding due to the need for their location in relation to the public highway.
- 6.6.28 The Grid Connection Corridor is predominantly located within areas of medium risk of fluvial /tidal flooding (Flood Zone 2) and high risk of

fluvial/tidal flooding (Flood Zone 3). As explained in **Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1]**, the identification of the Grid Connection Corridor considered the operational and engineering requirements including the need to connect to the National Grid Drax Substation; planning and environmental constraints which included the flood risk context; and other land use and land ownership constraints. This confirmed that a corridor outside Flood Zones 2 and 3 would not be possible and no reasonable alternatives are available in Flood Zone 1. Areas of the Grid Connection Corridor within Flood Zone 3 were also unable to be avoided by using Flood Zone 2 land.

- 6.6.29 Parts of the Ecology Mitigation Area lie within Flood Zone 3 however this proposed use is water compatible in accordance with Annex 3 of the NPPF and therefore is an appropriate use in any Flood Zone.
- 6.6.30 Given the above, the Sequential Test has, where relevant, been met for the site selection and design of the Scheme in accordance with NPS EN-1, the NPPF and draft NPS EN-1.

Exception Test

- 6.6.31 The Solar PV Site, Interconnecting Cable Corridor, Grid Connection Corridor, and Site Accesses are classed as 'Essential Infrastructure' as defined in Annex 3 of the NPPF (Ref. 61). In accordance with Table 2 of the PPG (add ref), the Scheme should avoid Flood Zone 3a and 3b where feasible. Where this is unavoidable, the development is required to pass the Exception Test. As some of the Scheme's infrastructure within the Solar PV Site and the Grid Connection Corridor are proposed to be located within Flood Zone 3 it is necessary to apply the Exception Test to these parts of the Scheme.
- 6.6.32 The requirements of the Exception Test in national policy are discussed above. The most recent adopted policy for the Exception Test is set out in the NPPF and its supporting PPG and emerging policy in the draft NPS EN-1. The following explains how the Scheme meets the requirements of the Exception Test.

Wider sustainability benefits

- 6.6.33 In response to meeting the first requirement of the Exception Test set out in NPS EN-1, draft NPS EN-1 and the NPPF the need for the Scheme is explained in the **Statement of Need [EN010143/APP/7.1]** and summarised in Section 5 of this Planning Statement. Through the generation of low carbon electricity, the Scheme will contribute to the urgent need to decarbonise electricity generation in the UK as required by the latest adopted and emerging national energy policy and will contribute to the UK's obligations for net zero under the Climate Change Act 2008 (2050 Target Amendment) Order 2019 (Ref. 45). Specifically, it will deliver a significant amount of low carbon energy delivering the benefits to the energy system highlighted by Part 3 of draft NPS EN-1. The Scheme will have both a national, and global significance, through its contribution to decarbonisation of the UK's electricity generation.
- 6.6.34 In addition, the Scheme will include habitat creation and enhancement as set out in **Chapter 2 The Scheme, ES Volume 1 [EN010143/APP/6.1]**, **Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1]**, the **Biodiversity Net Gain Assessment Report [EN010143/APP/7.11]** and the **Framework**

Landscape and Ecological Management Plan (LEMP)

[EN010143/APP/7.14]. There are areas at high-risk of flooding within the Site which are excluded from development and are instead proposed to be used for ecological enhancement.

- 6.6.35 Taking the above into account, it is considered that the Scheme will provide wider sustainability benefits to the community, including job creation in the local area during construction and decommissioning, that outweigh its impacts on flood risk in accordance with NPS EN-1, draft NPS EN-1 and the NPPF.

Safe for its lifetime without increasing flood risk

- 6.6.36 In response to meeting the second requirement of the Exception Test set out in draft NPS EN-1 and the NPPF and the third requirement of the Exception Test in NPS EN-1, the information presented in section 7 of the FRA, **Appendix 9-3, ES Volume 2 [EN010143/APP/6.2]** and **Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 [EN010143/APP/6.1]** demonstrate that mitigation measures have been embedded into the design of the solar PV infrastructure and cabling and construction methods for the cabling. This will ensure that the Scheme will be at a low risk of flooding from all sources; will be safe for its lifetime; and that there will be no increase in flooding elsewhere.
- 6.6.37 Therefore, the Scheme satisfies the second element of the Exception Test of the NPPF, draft NPS EN-1 and NPS EN-1 (the third requirement in NPS EN-1, due to the additional criteria included).

Previously developed land

- 6.6.38 The additional requirement of the Exception Test, as set out in NPS EN-1 (Ref. 3) only, requires “*development to be on developable, previously developed land or, if it is not on previously developed land, that there are no reasonable alternative sites on developable previously developed land*”. The Sequential Test Report at **Annex C of the FRA Appendix 9-3, ES Volume 2 [EN010143/APP/6.2]** explains how previously developed brownfield land has been considered for the Solar PV Site. In summary, the Scheme is not located on previously developed land as there is no previously developed land in the Applicant’s area of search which meets the Scheme’s requirements in terms of land area. Therefore, there are no reasonably available alternative sites on previously developed land. The Scheme therefore satisfies the second requirement of the Exception Test in NPS EN-1.

Conclusion

- 6.6.39 The **FRA (Appendix 9-3, ES Volume 2 [EN010143/APP/6.2])** and supporting assessments and hydraulic modelling confirm that the Scheme, with design mitigation and best practice control measures, will not increase flood risk elsewhere and will remain safe for its lifetime throughout all phases of the Scheme, taking into account climate change. The proposed surface water drainage design (see **Framework Surface Water Drainage Strategy, Appendix 9-4, ES Volume 2 [EN010143/APP/6.2]**) demonstrates that SuDS have been designed into the Scheme with agreement from the relevant IDB regarding the location of this drainage design, in accordance with draft NPS EN-1 paragraph 5.8.36 (Ref. 2).

- 6.6.40 The trenchless HDD method proposed for construction of the underground cabling in the Grid Connection Corridor is expected to provide adequate protection of the existing flood defences for the River Ouse and Derwent in accordance with paragraph 5.8.17 of Draft NPS EN-1 (Ref. 2).
- 6.6.41 A sequential approach has been applied in selecting the land for the Scheme and to the layout and design of the solar infrastructure within the Solar PV Site demonstrating that the Sequential Test has been met. The Exception Test has also been passed owing to the wider sustainability benefits the Scheme will deliver.
- 6.6.42 In summary, the Scheme is therefore in accordance with the flood risk and drainage policies of NPS EN-1, draft NPS EN-1, NPPF and the relevant local plans.

6.7 Water quality and resources

Planning Policy Context

- 6.7.1 NPS EN-1 paragraph 5.15.2 (Ref. 3) and draft NPS EN-1 paragraph 5.16.2 (Ref. 2) state that where a project is likely to have a significant effect on the water environment, the applicant should undertake an assessment of the existing water status of, and impacts of, the proposed project on water quality, water resources and physical characteristics of the water environment as part of its ES.
- 6.7.2 Paragraph 5.16.12 of Draft NPS EN-1 (Ref. 2) also states that “*The Secretary of State will need to give impacts on the water environment more weight where a project would have an adverse effect on the achievement of the environmental objectives established under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017*”.
- 6.7.3 Paragraph 5.16.14 (Ref. 2) also states that “*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*” and in paragraph 5.16.16 that “*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.*”
- 6.7.4 Local planning policy, specifically Policy EC5 and ENV4 of the East Riding Local Plan (Ref. 24) and East Riding Local Plan Update (Ref. 33), Policy SP18 of the Selby District Core Strategy (Ref. 28), and Policy SG10 and NE5 of the Selby District Local Plan Publication Version (Ref. 34) seeks to protect the water quality and ensure developments accord with the Water Framework Directive.

Assessment Conclusions

- 6.7.5 **Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 [EN010143/APP/6.1]** presents the assessment of the likely significant effects on surface water bodies (e.g. rivers, streams, ditches, canals, lakes and ponds) including water quality and hydromorphology and the potential effects on hydrogeology.

- 6.7.6 A **Water Framework Directive Assessment** is provided at **Appendix 9-2, ES Volume 1 [EN010143/APP/6.1]** (the WFD Assessment). It is informed by the WFD status and objectives from the appropriate River Basin Management Plan. The WFD Assessment considers the potential impacts and associated mitigation of the Scheme in relation to the WFD quality elements of the Rivers Ouse and Derwent; the Fleet Dike, River Foulness and three groundwater bodies, namely the Wharfe and Ouse Lower Sherwood Sandstone; Derwent Sherwood Sandstone and East Riding Mercia Mudstone.
- 6.7.7 **Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 [EN010143/APP/6.1]** concludes that with the implementation of mitigation measures including best practice measures secured via detailed management plans which will need to accord with the **Framework CEMP [EN010143/APP/7.7], OEMP [EN010143/APP/7.8] and DEMP [EN010143/APP/7.9]** no significant effects to any of the surface water bodies or groundwater bodies during the construction, operation or decommissioning phases of the Scheme are anticipated.
- 6.7.8 The WFD assessment concludes that, overall with the mitigation proposed, the Scheme will not cause deterioration in any WFD quality element for any waterbody, nor will it prevent future improvement, including the achievement of the wider WFD objectives in the Humber River Basin Management Plan, or mitigation measures developed to achieve Good status.
- 6.7.9 As part of the detailed CEMP a WFD Mitigation and Enhancement Strategy is proposed post-consent outlining length-for-length equivalent watercourse enhancements to mitigate culvert extensions.

Appraisal

- 6.7.10 Through appropriate management of construction and decommissioning activities the Scheme will have no significant adverse effects on water environment receptors during these phases.
- 6.7.11 During construction the majority of the works across the Solar PV Site will be buffered from watercourses by at least 10 m and will be on relatively flat topography. As such, the risk to watercourses from construction activities is considered generally low. In addition, works to lay the Grid Connection Cable would consist of techniques that would not disrupt the watercourse bed associated with the Rivers Ouse and Derwent including HDD to an appropriate depth with appropriate offsets from the river bank (as detailed in the Framework CEMP [EN010143/APP/7.7]).
- 6.7.12 Throughout the construction works, best practice mitigation measures, as secured through the CEMP (which would be required to be in accordance with the **Framework CEMP [EN010143/APP/7.7]**) would be implemented to manage trenched and trenchless crossings of watercourses and the management of construction site run off and spillages. It is considered the decommissioning impacts and effects would mirror those of the construction phase and would be managed by a detailed DEMP which would be required to be in accordance with the **Framework DEMP [EN010143/APP/7.9]**.
- 6.7.13 During operation within the area of solar PV panels, the impermeable area would remain largely consistent with its pre-development state as solar PV panels are elevated above ground and incident rainfall will run off them and

then infiltrate to ground, as it does now. The surface water drainage design which would accord with the **Framework Surface Water Drainage Strategy** (See **Appendix 9-4, ES Volume 2 [EN010143/APP/6.2]**) will appropriately manage surface run off from the Grid Connection Substations.

- 6.7.14 A Water Management Plan (which will be produced post consent) will include details for water quality monitoring and pollution prevention and will be prepared and included alongside the final detailed CEMP. A WFD Mitigation and Enhancement Strategy will also be developed post-consent outlining length-for-length equivalent watercourse enhancements to mitigate culvert extensions which are required for culvert crossings.
- 6.7.15 As land is being taken out of arable agricultural use, the assessment identifies there would be a decrease in surface water runoff of agricultural additives to the land (be that nutrients in the form of phosphates and nitrates, or from pesticides, herbicides or insecticides). This will have a beneficial effect on the water environment. Taking land out of arable production may also have other benefits by reducing the risk of soil erosion and the need for local water abstraction for crop irrigation.
- 6.7.16 In summary, the Scheme, through the careful management of construction, operation and decommissioning activities, would minimise adverse effects as far as practicable on the water environment and no effects would be significant. The Scheme will therefore not result in deterioration of a water body or its failure to achieve good status or good potential therefore according with NPS EN-1, draft NPS EN-1 and relevant local plan policies.

6.8 Biodiversity

Planning Policy Context

- 6.8.1 NPS EN-1 Paragraph 5.3.3 (Ref. 3) and Draft NPS EN-1 paragraph 5.4.17 (Ref. 2) state that the “*ES should clearly set out any effects on internationally, nationally, regionally and locally designated sites of ecological or geological conservation importance, on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats*”. NPS EN-1 (Ref. 3) paragraphs 5.3.8, 5.3.9, 5.3.10, 5.3.11 and 5.3.13, and Draft NPS EN-1 paragraph 5.4.48 require the Secretary of State to attach appropriate weight to these ecological receptors and designated sites according to their level of importance.
- 6.8.2 As a general principle, paragraph 5.3.7 of NPS EN-1 (Ref. 3), expects development to “*avoid significant harm to biodiversity and geological conservation interests, including through mitigation and consideration of reasonable alternatives but where significant harm cannot be avoided, then appropriate compensation measures should be sought*”. Draft NPS EN-1 paragraph 5.4.42 (Ref. 4) sets out the same requirement.
- 6.8.3 NPS EN-1, in paragraph 5.3.14 (Ref. 3), explains “*Aged or ‘veteran’ trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided. Where such trees would be affected by development proposals the Applicant should set out proposals for their conservation or, where their loss is unavoidable, the reasons why.*”
- 6.8.4 Draft NPS EN-1 at paragraph 5.4.32 (Ref. 2) states that “*Applicants should include measures to mitigate the direct and indirect effects of development*

on ancient woodland, veteran trees or other irreplaceable habitats during both construction and operational phase". Furthermore it states in paragraph 5.4.54 that "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 or veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists."

- 6.8.5 NPS EN-3 (Ref. 14) paragraph 2.4.2 (Ref. 14) further adds that renewable energy NSIPs should demonstrate 'good design' by mitigating effects on ecology. Draft NPS EN-3 (Ref. 3) sets out a similar principle and also identifies at paragraph 3.10.69 that 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.
- 6.8.6 Draft NPS EN-3 paragraph 3.10.91 (Ref. 4) refers to the need for the applicant to "*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.*" Paragraph 3.10.92 adds that "*The impact of the proposed development on established trees and hedges should be informed by a tree survey and arboricultural/hedge assessment as appropriate*".
- 6.8.7 Paragraph 3.10.80 of Draft NPS EN-3 (Ref. 4) explains that solar farms have the potential to increase the biodiversity value of a site, especially if the land was previously intensively managed. In some instances, this can result in significant benefits and enhancements beyond Biodiversity Net Gain, which result in wider environmental gains which is encouraged. As acknowledged in NPS EN-1 (Ref. 3) the benefits of significant low carbon infrastructure may outweigh other harm to biodiversity interests.
- 6.8.8 Local policies require development to protect and enhance ecological and biodiversity features where possible, including ensuring that designated sites of nature conservation are given appropriate weight in decision making. These policies include Policy S2, EC5, ENV1, ENV4, ENV5 of the East Riding Local Plan (Ref. 24) and Local Plan Update (Ref. 33), and Policy S9 of East Riding Local Plan Update (Ref. 33), as well as Policies ENV1, ENV9, ENV11, ENV12, ENV13 of the Selby District Local Plan (Ref. 29), Policies SP15, SP17 and SP18 of the Selby District Core Strategy (Ref. 28), and Policies SG10, NE1, NE2, NE3, NE5, NE6 and NE7 of the Selby District Local Plan Publication Version 2022 (Ref. 34).

Assessment conclusions

- 6.8.9 **Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1]** provides an assessment of the Scheme's impact on important ecological features and is supported by extensive survey work (see **Appendices 8-2 to 8-10, ES Volume 2 [EN010143/APP/6.2]**) to confirm the ecological habitats and species likely to be affected by the Scheme.
- 6.8.10 With the implementation of suitable embedded mitigation, the assessment of effects on important ecological features has concluded that the construction, operation and decommissioning phases of the Scheme are unlikely to result

in significant adverse effects for the majority of the important species, habitats and designated sites considered. Where significant adverse effects have been identified appropriate mitigation has been proposed and therefore residual effects are not significant.

- 6.8.11 To support the Secretary of State with its duties under the Conservation of Habitats and Species Regulations 2017 (as amended) and in accordance with planning policy, a **Habitats Regulations Assessment (HRA) [EN010143/APP/7.12]**, has been prepared. The HRA concludes that the Scheme will not have an adverse effect on the integrity of any European Sites either alone or in combination with other projects or plans.
- 6.8.12 An Arboricultural Impact Assessment has been undertaken and is presented in **Appendix 10-5, ES Volume 2, [EN010143/APP/6.2]** which considers the likely direct and indirect arboricultural impacts of the Scheme on trees within or immediately adjacent to the Order limits. This concludes that tree loss to facilitate the Scheme represents only 0.60% (8,432m²) of the canopy cover area of established amenity trees within or adjacent to the Order limits. This excludes the willow coppice in Solar PV Area 3c which will be removed for biomass prior to the construction of the Scheme. No veteran, ancient or trees subject to Tree Preservation Orders are to be removed.
- 6.8.13 As detailed in the **Biodiversity Net Gain (BNG) Assessment Report [EN010143/APP/7.11]**, based on the current design of the Scheme, it is predicted that the Scheme will result in a net gain of 80.42% for area-based habitat units, a net gain of 3.89% for hedgerow units, and a net gain of 10.84% for watercourse units. This is likely to underestimate the actual BNG that will be achieved by the Scheme, as the assessment has been carried out based on maximum design principles. The Applicant therefore commits to achieving a minimum 10% BNG for all units and will demonstrate this via an updated BNG assessment prior to construction which is secured by a requirement of the DCO.

Appraisal

Internationally and nationally designated nature conservation sites

- 6.8.14 There are no internationally designated sites for nature conservation within the Solar PV Site, Interconnecting Cable Corridor, Ecology Mitigation Area and associated Site Accesses. The Grid Connection Corridor does however cross the River Derwent SAC/SSSI. **Figure 8-1, ES Volume 3 [EN010143/APP/6.3]** identifies internationally designated sites for nature conservation within 10km of the Order limits.
- 6.8.15 The crossing of the River Derwent SAC/SSSI is proposed using HDD, to avoid direct impacts to the river and associated riparian habitats. Measures will be implemented to minimise visual, lighting and noise disturbance and dust impacts. These are included in the **Framework CEMP [EN010143/APP/7.7]** and will be secured within a detailed CEMP as a requirement of the DCO.
- 6.8.16 The construction of the Scheme is anticipated to result in the loss of functionally linked habitat to the Lower Derwent Valley SPA/Ramsar and the Humber Estuary SPA/Ramsar, with abundances of qualifying species (i.e., golden plover and pink-footed goose), reaching or approaching the 1% population threshold. Additional mitigation is therefore proposed to avoid

- significant residual effects on the integrity of these internationally designated sites.
- 6.8.17 This includes the creation of the Ecology Mitigation Area within which there is proposed to be 28.75 ha of land near to River Foulness to be managed as wet grassland habitat for Golden Plover birds and 79.09 ha to remain in the current arable rotation with amendments to improve habitat quality such as increased retention of stubble for Pink Footed Goose. The overall objective of the mitigation is to ensure that there is no net loss in feeding opportunities for Golden Plover and Pink-footed Goose, based on the populations recorded during non-breeding bird surveys in 2022/23 (**Appendix 8-5, Volume 7 [EN010143/APP/6.1]**) Further details of this mitigation is set out in the HRA and Framework LEMP. A detailed LEMP will be used to secure this mitigation post consent. Discussions have been held with Natural England regarding the suitability of these mitigation proposals and these are ongoing.
- 6.8.18 The potential for significant adverse effects on the River Derwent SAC/SSSI and Lower Derwent Valley SAC through disturbance to otter due to construction noise (specifically HDD of the cables under the watercourse, which could require 24 hour working) has also been identified. Additional mitigation is proposed during construction to reduce these effects which are then not significant. This includes using noise fencing during construction around required noise generating activities. Avoidance of the core spawning seasons of migratory fish species, unless the HDD are of sufficient depth to avoid the effect, will reduce the likely impact of noise and vibration during HDD on these species.
- 6.8.19 The **HRA [EN010143/APP/7.12]** confirms that overall the Scheme would not result in adverse effects on the integrity of the Lower Derwent Valley SAC and River Derwent SAC regarding noise and visual disturbance to qualifying otter; and the integrity of the Lower Derwent Valley SPA/Ramsar and Humber Estuary SPA/Ramsar regarding noise and visual disturbance to qualifying birds. The HRA also confirms that with the measures implemented as set out in the **Framework CEMP [EN010143/APP/7.12]** overall the Scheme would not result in adverse effects on the integrity of the Lower Derwent Valley SAC, River Derwent SAC, Lower Derwent Valley SPA/Ramsar and Humber Estuary SPA/Ramsar sites regarding water quality and the River Derwent SAC regarding atmospheric pollution through dust release.
- 6.8.20 The temporary impacts of the vegetation clearance required within the River Derwent SAC for the access track off the A63 were also considered and the **HRA [EN010143/APP/7.7]** reports that the main terrestrial habitat components that are functionally linked to the River Derwent SAC are wet woodland and fen, neither of which are present along the access track. Therefore, the temporary removal of vegetation would only affect site fabric that is not considered critical for the SAC to achieve its Conservation Objectives.
- 6.8.21 **Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1]** therefore reports that the likely residual effects on the Lower Derwent Valley SPA/Ramsar, the Humber Estuary SPA/Ramsar, the Lower Derwent Valley SAC and River Derwent SAC/SSSI, and their associated species, taking into account the proposed mitigation would not be significant.

- 6.8.22 There would be no direct impact on the remaining Internationally Designated Nature Conservation Sites within 10km of the Order limits.
- 6.8.23 Regarding other nationally designated sites, Barn Hill Meadows SSSI, Beighton Meadows SSSI, Lower Derwent Valley National Nature Reserve, Derwent Ings SSSI are within 2km of the Order limits and Eskamhorn Meadows SSSI, Humber Estuary SSSI, are within 5km of the Order limits. Given the distance between these sites and the Order limits there will be no direct impacts. Measures to minimise visual, lighting and noise disturbance and dust from construction and decommissioning phases are outlined in the **Framework CEMP [EN010143/APP/7.7]** and **Framework DEMP [EN010143/APP/7.9]** a detailed CEMP and DEMP will be prepared and will need to be adhered to by requirements of the DCO.

Sites of regional and local biodiversity interest

- 6.8.24 There are two local wildlife sites within the Order limits. Tottering Lane, Gribthorpe LWS lies within the Interconnecting Cable Corridor between Solar PV Area 1a and Solar PV Areas 1b and 1e. Wressle Verge LWS is located in both the Interconnecting Cable and Grid Connection Corridors and runs north to south between Solar PV Areas 3a and 3b (along Wood Lane) and east to west along the northern boundary of Solar PV Area 3b (along Brind Lane) (as shown on **Figure 8-2, ES Volume 3 [EN010143/APP/6.3]**).
- 6.8.25 The **Framework CEMP [EN010143/APP/7.7]** details the measures proposed to limit disturbance to habitat inside these LWS during construction. This includes ensuring the working area for the cable installation across the verges will be kept to a minimum of 5 m width inside the LWSs and no spoil, materials or vehicles will be stored within the LWS. Once the cable(s) have been installed, the removed turfs and soil from the LWS (stored separately to that of adjacent fields) will be backfilled and replaced promptly, retaining the original topsoil and seed bank. Vegetation clearance will also be required for the provision of the new and modified existing access tracks across the LWSs. The replacement of the hedgerows and retention of the verge turfs relating to this work has been included within the landscape design (as presented in the **Framework LEMP [EN010143/APP/7.14]**).
- 6.8.26 Other regionally and locally designated sites of nature conservation identified in the assessment would not experience direct impacts but some would have indirect impacts due to hydrological connections or being in close proximity to the construction and decommissioning works and affected by noise, dust and lighting disturbance. With appropriate control measures (as set out in the **Framework CEMP [EN010143/APP/7.7]** and **Framework DEMP [EN010143/APP/7.9]**) and secured through a detailed CEMP and DEMP through requirements of the DCO) these effects would be minor adverse or negligible and not significant.

Ancient woodland, veteran trees and important hedgerows

- 6.8.27 There is no ancient woodland within 2km of the Order limits.
- 6.8.28 The majority of trees (which are not classed as veteran or ancient) will be retained, and measures taken to avoid direct or indirect impacts. 53 individual trees, 17 groups of trees and 44 hedgerows are to be removed or part removed to facilitate the Scheme: this includes only four individual trees

- and one part group classed as high quality (Category A) and 17 individual trees and two part groups classed as moderate quality (Category B).
- 6.8.29 Twenty-nine tree features have been identified as likely to require pruning to facilitate access as shown within **Appendix 10-5 Arboricultural Impact Assessment and Tree Protection Report ES Volume 6 [EN010143/APP/6.2]**.
- 6.8.30 Of the trees to be pruned none are protected by a TPO or Conservation Area and none are within the River Derwent SSSI/SAC. One tree (T45) to be pruned is considered to be ancient and pruning may be required to facilitate a temporary clearance for vehicular access; the final extent of pruning is to be agreed on site with an arboriculturist, but is not considered likely to result in a detrimental impact to the tree due to its species (crack willow which is tolerant of pruning), good vitality, and due to the existing clearance maintained over the existing hard surfaced access route.
- 6.8.31 The Applicant is committed to a design principle to ensure veteran and ancient trees are outside of the developable areas of the Scheme, with a minimum 15 m stand-off buffers applied. The Scheme is committed to a design principle to ensure hedgerows are outside of the developable areas of the Scheme, with minimum 5 m undeveloped stand-off buffers.
- 6.8.32 Where practicable, the layout of the Scheme uses existing farm tracks, internal haul roads and existing field openings as the preferred routes for construction access, minimising loss of hedgerow sections. Therefore, the majority of this habitat will be retained, however, some sections of hedgerow will need to be removed to facilitate access and the construction of cable routes.
- 6.8.33 Measures to protect retained trees and hedgerows would be put in place and secured through a detailed CEMP, DEMP and LEMP as requirements of the DCO. These would be in accordance with the measures set out in the **Framework CEMP [EN010143/APP/7.7] and DEMP [EN010143/APP/7.9] and Framework LEMP [EN010143/APP/7.14]**.

Protected Species and Other Habitats

- 6.8.34 **Table 8-10 of Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1]** summarises the important ecological features that are relevant to the Scheme. This includes protected species and other habitats within and close to the Order limits.
- 6.8.35 The construction, operation and decommissioning phases of the Scheme are not anticipated to result in any significant adverse impacts to protected species and other habitats within and close to the Order limits.
- 6.8.36 Measures to protect protected species and habitats are set out in the **Framework CEMP [EN010143/APP/7.7] and DEMP [EN010143/APP/7.9] and Framework LEMP [EN010143/APP/7.14]**. A **Framework Surface Water Drainage Strategy (Appendix 9-4, ES Volume 6 [EN010143/APP/6.2])** has been developed to manage surface water runoff from the Grid Connection Substations to protect the aquatic and riparian species and habitats.
- 6.8.37 Beneficial effects to semi-improved neutral grassland, terrestrial invertebrates, bats, reptiles, and other mammals (hedgehogs, brown hare, harvest mouse and polecat, and common amphibians are anticipated as a

result of the landscape design and biodiversity net gain for the Scheme which includes large areas of species-rich grassland, semi-improved grassland and flower rich grassland.

- 6.8.38 The Scheme design also includes for suitable gaps at the bottom of the perimeter fencing to be maintained to enable continued access into the Solar PV Site for mammals (e.g. badger), which is embedded into the Scheme design. Therefore connectivity for small mammals across the Solar PV Site and Ecology Mitigation Area will be maintained.

Summary

- 6.8.39 The Scheme successfully avoids and mitigates significant adverse effects on internationally, nationally and locally designated sites and other important ecological features such as protected species and habitats. This has been achieved through careful design informed by a design team with qualified ecologists and embedding appropriate mitigation measures during construction, operation and decommissioning phases, including appropriate buffers.
- 6.8.40 In addition to protecting existing features of biodiversity value, the Applicant has also taken opportunities to maximise the enhancement of the biodiversity value of the Solar PV Site and other parts of the Scheme where relevant, including within field margins, undeveloped areas set aside for biodiversity enhancement, and in the land between and below solar PV infrastructure. This is explained in Section 5 of this Planning Statement and in the **Framework LEMP [EN010143/APP/7.14]** and **Design and Access Statement [EN010143/APP/7.3]** and illustrated on the landscape masterplan provided in both these documents. As a result, the Scheme delivers biodiversity net gain, and substantial improvement regarding habitat units due to the baseline of mostly agricultural fields.
- 6.8.41 The Scheme is therefore in accordance with NPS EN-1, NPS EN-3, Draft NPS EN-1, Draft NPS EN-3 and local planning policy relating to the protection and enhancement of biodiversity.

6.9 Agricultural Land

Planning Policy Context

- 6.9.1 NPS EN-1 paragraph 5.10.8 (Ref. 3) and Draft NPS EN-1 paragraph 5.11.12 (Ref. 2) state: *“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)”*.
- 6.9.2 NPS EN-1 paragraph 5.10.15 (Ref. 3) states that the decision maker: *“should ensure that applicants do not site their scheme on the best and most versatile agricultural land without justification”* and that little weight should be given to the loss of poorer quality agricultural land (in grades 3b, 4 and 5). Draft NPS EN-1 paragraph 5.11.34 (Ref. 2) states that *“Where development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.”*
- 6.9.3 Draft NPS EN-3 (Ref. 4) provides clarification and guidance on how policies relating to Best and Most Versatile (BMV) agricultural land should be interpreted for solar NSIP schemes. It clarifies at paragraphs 3.10.14 to

- 3.10.16 that *“Whilst the development of ground mounted solar arrays is not prohibited on agricultural land classified 1, 2 and 3a, the impacts of such are expected to be considered. It is recognised that at this scale, it is likely that applicants’ developments may use some agricultural land. Applicants should explain their choice of site, noting the preference for development to be on brownfield and non-agricultural land.”*
- 6.9.4 Paragraph 3.10.18 of Draft NPS EN-3 (Ref. 4) states that *“if necessary, field surveys should be used to establish the ALC grades”* in accordance with the current, grading criteria, *“to identify the soil types to inform soil management at the construction, operation, and decommissioning phases in line with the Defra Construction Code”*. Paragraph 3.10.19 of Draft NPS EN-3 further states that a Soil Resources and Management Plan should be developed, to help minimise impacts on soil health and potential land contamination.
- 6.9.5 In terms of local planning policy, adopted East Riding Local Plan (Ref. 24) Policy S4 supports development within the countryside which *“does not involve a significant loss of best and most versatile agricultural land”*. Policy SG9 of the Selby District Council Local Plan Publication Version Consultation 2022 (Ref. 34), which is relevant to the Grid Connection Corridor, states that
- “The best and most versatile land will be protected by;*
- 1. Avoiding the irreversible loss of the best and most versatile agricultural land (Grade 1 to 3a) where possible; and*
 - 2. Avoiding Grade 1 agricultural land unless there are exceptional circumstances where the benefits of the proposal significantly outweigh the loss of land.”*
- 6.9.6 National and local planning policy is consistent in seeking to minimise impact on BMV land and to guide development away from BMV land where possible, except where its use is justified by other sustainability considerations.

Assessment conclusions

- 6.9.7 **Chapter 15: Soils and Agricultural Land, ES Volume 1** [EN010143/APP/6.1] presents the findings of an assessment of the likely significant effects on soils and agricultural land as a result of the Scheme. This is supported by soil surveys and data which are provided at **Appendix 15-2 and Appendix 15-3, ES Volume 2, [EN010143/APP/6.2]**.
- 6.9.8 The assessment identifies that approximately 92.9 % of land within the Solar PV Site is of non-BMV quality (Subgrade 3b and Grade 4). BMV land comprises approximately 6.3 % of land within the Solar PV Site; this is mainly located in Solar PV Areas 2g and 3c. Further isolated patches of Subgrade 3a land were identified within the Solar PV Areas 1a and 2f however due to their small size all of these areas of BMV land are likely to only be farmable as per the lower grade surrounding land. The remaining land is non-agricultural (tracks etc.).
- 6.9.9 The assessment identifies that approximately 80.8% of the Ecology Mitigation Area is of non-BMV quality (Subgrade 3b). 17.1% is of BMV quality (Subgrade 3a), however the majority of this (10.5 %) is located in the Goose Mitigation Zone which will remain in arable rotation. The remaining land is non-agricultural.

- 6.9.10 The Predictive ALC Data show that the majority of agricultural land within the Grid Connection Corridor (61.2 %) is of non-BMV quality (Subgrade 3b). Similarly, 81.72 % of the Interconnecting Cable Corridor is of non-BMV quality (Subgrade 3b).
- 6.9.11 The assessment considers a worst case scenario that all land within the Solar PV Site and land within the Ecology Mitigation Area for the Golden Plover Mitigation Zone is removed from agricultural use during the operational phase. Upon decommissioning, the assessment assumes all hard standing within the Solar PV Site and Golden Plover Mitigation Zone will be removed and the land restored to its previous condition and available for agricultural land use again, with the exception of the Grid Connection Substation Compounds and associated accesses (Solar PV Area 1c resulting in permanent creation of 2 ha of hardstanding on Subgrade 3b land), and areas of tree/hedge planting (8.97 ha of non BMV Subgrade 3b land and 0.41 ha of BMV Subgrade 3a land for the creation of woodland, shrub and a traditional orchard).
- 6.9.12 No significant adverse effects to soils or agricultural land are predicted to occur as a result of the Scheme.
- 6.9.13 Regarding the Scheme's impacts on BMV agricultural land, the assessment concludes that the irreversible loss of 0.41 ha of BMV agricultural land for tree and hedge planting within the Solar PV Site would result in a slight adverse effect which is not considered to be significant.
- 6.9.14 The long term, reversible loss of 0.67 ha of BMV land through conversion to hardstanding for Field Stations and internal access tracks which would be decommissioned and 59.91 ha of BMV land (Grades 1, 2 and Subgrade 3a) through conversion of arable land to grassland (which is taken out of agricultural production during operation of the Scheme but could return to agricultural use following decommissioning) within the Solar PV Site would result in a slight adverse effect which is not considered to be significant.
- 6.9.15 For the Ecology Mitigation Area, the assessment concludes that the long term, reversible loss of 7.20 ha of BMV land through conversion of arable land to grassland for the Golden Plover Mitigation Zone (which is taken out of agricultural production during operation of the Scheme but returned to agricultural use following decommissioning) would result in a slight adverse effect which is not considered to be significant. The 11.29 ha of BMV land used for the Goose Mitigation Zone would remain in arable rotation with amendments to improve habitat quality such as increased retention of stubble. The assessment therefore concludes there would be no loss of BMV agricultural land and therefore no effect.
- 6.9.16 Regarding the impacts on non BMV agricultural land, the assessment concludes that the irreversible loss of 8.97 ha of Subgrade 3b non BMV agricultural land for tree and hedge planting within the Solar PV Site would result in a neutral effect which is not considered to be significant. Further, the irreversible loss of 2 ha of Subgrade 3b land for the Grid Connection Substations and associated accesses would result in a slight adverse effect due to the permanent sealing of the land by the hardstanding. The assessment concludes this effect is not significant.
- 6.9.17 The assessment also concludes that the long term, reversible loss of 8.42 ha of non BMV agricultural land through conversion to hardstanding for Field

Stations and internal access tracks which would be decommissioned and 878.43 ha of non BMV (Subgrade 3b and Grade 4) agricultural land through conversion of arable land to grassland within the Solar PV Site would result in a neutral effect which is not considered to be significant. This is because the land is taken out of agricultural production during operation of the Scheme but could return to agricultural use following decommissioning.

- 6.9.18 The assessment confirms the agricultural land within the Grid Connection and Interconnecting Cable Corridors will be temporarily disturbed during construction and will be reinstated to its original condition (ALC grade) on completion of construction. The land can be farmed after installation of the buried cables. Depending upon ALC grading the impacts are assessed as neutral to slight adverse resulting in no significant effect.
- 6.9.19 Impacts on soils are also detailed in **Chapter 15: Soils and Agricultural Land, ES Volume 1 [EN010143/APP/6.1]**. The assessment concludes that there would be no effects on peat soils as no solar PV infrastructure or earthworks are located in areas of peat soil. With embedded mitigation regarding the use of best practice in soil stripping, handling and storage of soil materials effects on soil function and structure are assessed as neutral.
- 6.9.20 During operation, the long-term, reversible conversion of arable to grassland within the Solar PV Site has the potential to accrue improvements to soil function relating to improvements to soil structure and consequent increased permeability and increased resilience to erosion, as well as increases to soil carbon content. However, a cautionary approach has been taken in the assessment to the calculation of significance as the potential benefits, although extensive in area, are not permanent and are reversible. A slight benefit, and an effect which is not significant, has been concluded.
- 6.9.21 The decommissioning effects are anticipated to be of a similar or lesser magnitude than the construction effects. The Planning Inspectorate agreed, therefore, that these matters may be scoped out of the assessment.

Appraisal

- 6.9.22 Agricultural land quality was a key consideration in the Applicant's site selection process. As discussed in **Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1]** the Initial Area of Search of 15km from the point of connection at National Grid's Drax Substation was refined using the Defra's provisional Agricultural Land Classification (ALC) mapping (Ref. 62) alongside the mapping of other environmental and planning constraints and designations. This identified a refined area of search (see **Figure 3-2, ES Volume 3, [EN010143/APP/6.3]**) which avoided large areas of BMV and focussed on identifying land for the Scheme within a large area of relatively unconstrained non-BMV land.
- 6.9.23 Initial discussions with landowners as part of the site selection process then identified land, within this area of search, that was least productive or more difficult to farm. Previously developed land was also considered. These land types were identified within the refined area of search by checking the local authority brownfield register and local knowledge however, no suitable areas of brownfield or non-agricultural land which would be able to form part of the Solar PV Site were identified within the search area.
- 6.9.24 As part of the design process and using the results of soil surveys and other sources of ALC data for the Solar PV Site, the Applicant has sought to

minimise the amount of BMV agricultural land included within the Solar PV Site. Specifically, the Applicant reduced the areas of Solar PV Area 2g and Solar PV Area 3c, removing BMV land from the Scheme. This has resulted in only 6.3% of the Solar PV Site being BMV agricultural land.

- 6.9.25 The layout of the Solar PV Site has also considered the location of BMV land with the Grid Connection Substations which will potentially remain following decommissioning being located outside BMV land.
- 6.9.26 With regard to the Grid Connection Corridor, as shown on **Figure 3-4** the land immediately surrounding the National Grid Drax Substation is classed as BMV ALC Grades 1 and 2. **Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/PP/6.1]** discusses the selection of the Grid Connection Corridor and the reasons why there were no alternatives wholly avoiding BMV land.
- 6.9.27 The disturbance to agricultural land within the Grid Connection Corridor and the Interconnecting Cable Corridors will be short term as the land would be reinstated following construction. There would be no noticeable loss or reduction in soil functions or volumes that would prevent reinstatement to its original condition (ALC grade) on the completion of construction.
- 6.9.28 **A Framework Soil Resource Management Plan (SRMP) [EN010143/APP/7.10]** has been prepared detailing the measures to protect the soil resource during construction and a detailed SRMP is a requirement of the DCO.
- 6.9.29 During operation, within the Solar PV Site there is potential to accrue improvements to soil function and increases to soil carbon content with the land being taken out of arable agricultural use.
- 6.9.30 Given the commitment to decommission the Scheme 40 years after final commissioning, which is secured by requirement 18 of the DCO (see **draft DCO [EN010143/PP/3.1]**), and the siting of solar PV infrastructure which is to be removed, there will be a very small (0.41 ha) irreversible loss of BMV agricultural land within the Solar PV Site which is assessed to be slight adverse and not significant. This is for ecological enhancement therefore providing a benefit. The decommissioning requirement also means the majority of the Scheme's impact on agricultural land (both BMV and non BMV land) overall is therefore reversible with limited irreversible loss of non BMV land to hardstanding and tree/hedge planting.
- 6.9.31 In summary the Scheme maximises the use of poorer quality agricultural land and is justified in using some BMV for the Scheme for the following reasons:
- a. The urgent need for the large scale renewable energy generation as discussed within the **Statement of Need [EN010143/APP/7.1]**.
 - b. The lack of suitable alternative sites in the vicinity of the National Grid Drax Substation POC with a lower ALC rating than the majority of the Order limits.
 - c. The design of the Solar PV Site layout has limited the use of BMV land and minimised impacts where practicable through the reduction in BMV land throughout the design evolution of the Scheme.

- d. The majority of the impact of the Scheme on agricultural land is reversible which is secured 40 years after final commissioning through a requirement of the DCO. The majority of the agricultural resource is therefore not lost and there is only a very small amount of irreversible BMV loss (0.41 ha) within the Solar PV Site which is providing an ecological enhancement benefit.
 - e. The improvements to soil function relating to improvements to soil structure and consequent increased permeability and increased resilience to erosion, as well as increases to soil carbon content that are predicted from the land being taken out of arable agricultural use.
- 6.9.32 Overall, the Scheme has sought to minimise the use of BMV where practicable and where this is used, this is justified. The Scheme therefore accords with NPS EN-1, draft NPS En-1 and local planning policies and this conclusion weighs in favour of granting the DCO.

6.10 Historic Environment

Planning Policy Context

- 6.10.1 NPS-EN1 paragraph 5.8.14 (Ref. 3) states that: *“There should be a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage asset, the greater the presumption in favour of its conservation should be. Once lost heritage assets cannot be replaced and their loss has a cultural, environmental, economic and social impact. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting”*.
- 6.10.2 Both NPS EN-1 5.8.14 (Ref. 3) and Draft NPS EN-1 paragraph 5.9.26 (Ref. 2) state *“Any harm or loss of significance affecting any designated heritage asset (from its alteration or development in its setting) should require clear and convincing justification”*.
- 6.10.3 Paragraph 5.9.25 of Draft NPS EN-1 (Ref. 2) states that: *“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.”*
- 6.10.4 As set out in NPS EN-1 (Ref. 3) and Draft NPS EN-1 (Ref. 2), designated assets are given significant weight and any substantial harm or loss of significance of a designated asset should be refused consent unless it can be demonstrated that *“the substantial harm to or loss of significance is necessary in order to deliver substantial public benefits that outweigh that loss or harm”* (NPS EN-1 paragraph 5.8.15 (Ref. 3) and draft NPS EN-1 paragraph 5.9.29 unless certain conditions apply.
- 6.10.5 Draft NPS EN-1 paragraph 5.9.30 (Ref. 2) states that *“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”*.

- 6.10.6 With regard to non-designated heritage assets, Draft NPS EN-1 (Ref. 2) states that “*Non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to Scheduled Monuments should be considered subject to the policies for designated heritage assets*” (Paragraph 5.9.6). It explains that these assets should be considered even though they are of lesser significance than designated heritage assets and that a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. Furthermore, paragraph 5.9.31 of draft NPS EN-1 (Ref. 2) requires the Secretary of State to have a balanced judgement “*having regard to the scale of any harm loss and the significance of the heritage asset.*” when “*weighing applications that directly or indirectly affect non-designated heritage assets*”,
- 6.10.7 Draft NPS EN-1 paragraph 5.9.21 (Ref. 2) makes reference to the Secretary of State needing to comply with regulation 3 of the Decision Regulations which are discussed in section 2 of this Planning Statement.
- 6.10.8 Local Policies EC5 and ENV3 of the East Riding Local Plan (Ref. 24) and Local Plan Update (Ref. 33), Policies SP18 and SP19 of the Selby District Core Strategy (Ref. 28), and Policies SG10, SG12 and SG13 of the Selby District Local Plan Publication Version (Ref. 34) seek to ensure that development protects and enhances the historic environment where possible and mitigates against any harm. Policy EN27 and ENV28 of the Selby District Local Plan (Ref. 29) specifically relate to scheduled monuments and archaeological assets.

Assessment conclusions

- 6.10.9 **Chapter 7, Cultural Heritage, ES Volume 1 [EN010143/APP/6.1]** and its supporting appendices **[EN010143/APP/6.2]** provide an assessment of the likely effects of the Scheme on heritage assets. This includes a description of the significance of the heritage assets and the contribution of their setting to their significance.
- 6.10.10 Geophysical survey (magnetometry) of the Solar PV Site and Grid Connection Corridor has been undertaken for the Scheme. The results of the geophysical survey are discussed in section 4.7 of **Appendix 7-2: Cultural Heritage Desk-Based Assessment, ES Volume 2 [EN010143/APP/6.2]** and reported in detail within **Appendix 7-3: Geophysical Survey Report, ES Volume 2 [EN010143/APP/6.2]**. Archaeological evaluation trenching has been undertaken across the Solar PV Site, the results of which are presented in **Appendix 7-4: Archaeological Trial Trenching Evaluation Report ES Volume 2 [EN010143/APP/6.2]**.

Designated assets and non-designated asset of schedulable quality

- 6.10.11 There are no designated heritage assets located within the Order limits and therefore the Scheme will not result in any direct physical impacts to these assets. During operation no designated heritage assets are expected to experience effects.
- 6.10.12 **Chapter 7, Cultural Heritage, ES Volume 1 [EN010143/APP/6.1]** identifies five designated heritage assets (four Grade II listed buildings and one scheduled monument) which would experience noise from construction machinery during the laying of the Grid Connection Cables within the Grid Connection Corridor. This would result in adverse effects to the setting of

these assets which are minor or negligible and not significant. In addition, Wressle Castle, a scheduled monument which includes a Grade I listed building, is predicted to experience impacts to the setting through the presence of the temporary construction compound at Babthorpe (see Construction Compound D, **Figure 2-4, ES Volume 3, [EN010143/APP/6.2]**) within a key view to and from the castle. With embedded mitigation, which includes the careful planning of construction and decommissioning traffic routes and the use of tractor trailers which are frequently seen in the landscape, the assessment concludes there would only be temporary impacts on designated heritage assets in terms of their setting as a result of construction of the Scheme and these are not significant. The assessment concludes the same for the decommissioning phase.

- 6.10.13 The assessment has identified one non-designated asset present within the Grid Connection Corridor which, given the current available information, is considered to be of schedulable quality. This is the Hagthorpe moated site (Historic Environment Record ref MNY10603) which is west of Construction Compound D. Through the construction of the Grid Connection Cable, it is likely that there would be the permanent removal of a very limited part of the archaeological remains at this site. The assessment explains that this has the potential to have a significant adverse effect through the direct impact on buried archaeological remains. This effect can however be mitigated through a programme of additional mitigation which may include preservation in situ, archaeological investigation and recording, and a protocol for dealing with unexpected archaeological discoveries during construction. This mitigation will be outlined in an Overarching Written Scheme of Investigation for Archaeological Mitigation which will be agreed with the archaeology officers for East Riding of Yorkshire Council and North Yorkshire Council.
- 6.10.14 A Heritage Statement of all designated heritage assets and the one non-designated asset of schedulable quality has been undertaken and is presented at **Appendix C** to this Planning Statement. The purpose of the Heritage Harm Assessment is to assess, in accordance with national policy and guidance, whether the Scheme would result in substantial harm to designated heritage assets and the non-designated asset of schedulable quality. The Heritage Harm Assessment concludes that the Scheme would not result in substantial harm to any designated assets. All effects to designated assets are not significant and can be reasonably equated with less than substantial harm. For the Hagthorpe moated site the Heritage Harm Assessment concludes that the removal of a very limited part of the archaeological remains at this site does not constitute substantial harm to the significance of the asset as a whole and therefore less than substantial harm to the significance of this asset as result of the Scheme is concluded.

Non-designated heritage assets

- 6.10.15 During construction, the Scheme will result in the loss of six non-designated archaeological assets (six areas of Romano-British settlement archaeology) and the non-designated historic farmstead at Johnson's Farm. These are assessed as potentially significant, however, with the implementation of additional mitigation the effect is reduced to minor adverse and is therefore considered not significant. Other impacts such as temporary noise impacts during construction and decommissioning assets upon assets and the loss of

historic hedgerows have also been assessed and effects are anticipated to be minor adverse or negligible and therefore not significant.

6.10.16 It is not expected that the operation of the Scheme will result in any further intrusive activities and so no impact to buried archaeological assets is anticipated during this phase. The potential for the Scheme to impact heritage assets as a result of long-term change to their setting was assessed as either resulting in no effect or being of negligible to minor effect for three non-designated heritage assets and therefore no significant effects are anticipated during operation.

Appraisal

6.10.17 The Scheme has been designed so that the solar PV infrastructure will be sited to minimise its impact on the setting of heritage assets. This has resulted in the Applicant successfully avoiding significant adverse effects on designated heritage assets and keeping harm to designated heritage assets to the construction and decommissioning phases which is therefore temporary 'less than substantial harm'. One non-designated asset of schedulable quality is likely to experience direct impact as a result of the laying of Grid Connection Cables and the national policy tests regarding harm have been considered for this asset due to its status. The potential significant adverse effect of the removal of a very limited part of this heritage asset can be mitigated through archaeological excavation and recording to allow greater understanding and appreciation of its heritage value which will mean the residual effect for this asset will not be significant and there will be local benefit in understanding this asset further.

6.10.18 The Scheme has therefore complied with relevant planning policy by minimising harm to heritage assets through sensitive design and protecting as much of their significance as practicable during the life of the Scheme.

6.10.19 In addition, the Scheme will be decommissioned after 40 years of operation with the majority of the land returned to its original condition in the future. This is secured by requirement 18 of the DCO. After decommissioning, the Scheme would not have any impact on the significance of heritage assets, thereby helping to preserve them for future generations.

6.10.20 With regard to the policy tests regarding harm, Section 5 and Section 6.2 of this Planning Statement summarise the significant public benefits and need for the Scheme. The significant public benefits of the Scheme therefore clearly and demonstrably outweigh the temporary less than substantial harm to designated heritage assets and very small scale permanent harm to the non-designated asset of schedulable quality that would result. The Scheme, therefore, meets the policy tests set out by NPS EN-1, Draft NPS EN-1 and local planning policy.

6.10.21 Given the above, consideration of the prescribed matters set out in Regulation 3 of the Decision Regulations (discussed earlier in section 2 of this Planning Statement) does not materially alter the planning balance for the Scheme.

6.10.22 Impacts are expected upon non-designated heritage assets however these are not significant with the implementation of a programme of archaeological excavation and recording which will be set out in an Overarching Written Scheme of Investigation for Archaeological Mitigation to be agreed with the host authorities. Historic building recording of the historic buildings at

Johnsons buildings will also be undertaken. This programme of excavation and recording would compensate for the loss of these heritage assets by preserving them by record; thereby allowing their continued study and achieving greater understanding and appreciation of their heritage value.

6.10.23 Overall, the Scheme accords with relevant policies relating to the historic environment in the NPS EN-1, draft NPS EN-1 and local policies. This conclusion weighs in favour of granting the DCO.

6.11 Noise and Vibration

Planning Policy Context

6.11.1 NPS EN-1 paragraph 5.11.4 (Ref. 3) and Draft NPS EN-1 paragraph 5.12.6 (Ref. 2) require a noise assessment to be prepared where noise and vibration impacts are likely to arise and set out the methodology for this assessment. Draft NPS EN-3 paragraph 3.5.2 (Ref. 2) explains that ‘good design’ should mitigate impacts such as noise, and that the noise and vibration impact of construction traffic should be considered. NPS EN-1 (Ref. 2) paragraph 5.11.6 and Draft NPS EN-1 paragraph 5.12.9 add that for operational noise this should be assessed using the principles of the relevant British Standards and other guidance.

6.11.2 NPS EN-1 and draft NPS EN-1 expect energy NSIPs to demonstrate good design with regard to mitigating noise impacts. Specifically, NPS EN-1 paragraph 5.11.8 (Ref. 3) and draft NPS EN-1 paragraph 5.12.15 (Ref. 2) expects projects to “*demonstrate good design through selection of the quietest cost-effective plant available; containment of noise within buildings wherever possible; optimisation of plant layout to minimise noise emissions; and, where possible, the use of landscaping, bunds or noise barriers to reduce noise transmission.*”

6.11.3 NPS EN-1 (paragraph 5.11.9 (Ref. 3) and Draft NPS EN-1 paragraph 5.12.17 (Ref. 2) state that the decision maker “*should not grant development consent unless it is satisfied that the proposals will meet the following aims:*

- a. *avoid significant adverse impacts on health and quality of life from noise;*
- b. *mitigate and minimise other adverse impacts on health and quality of life from noise; and*
- c. *where possible, contribute to improvements to health and quality of life through the effective management and control of noise”.*

6.11.4 Policies EC5 of the East Riding Local Plan (Ref. 24) and East Riding Local Plan Update (Ref. 33), Policy ENV2 and EMP10 of the Selby District Local Plan, Policy SP19 of the Selby District Core Strategy (Ref. 28) and Policies SG9, SG10, and NE8 of the Selby District Council Local Plan Publication Version (Ref. 34) require development to be acceptable in terms of noise and vibration.

Assessment Conclusions

6.11.5 **Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1]** has assessed the construction noise and vibration; construction traffic noise; and operational noise in accordance with the requirements identified in NPS EN-1 and draft NPS EN-1. For decommissioning activities, the assessment assumes these to be comparable, but no worse than construction activities.

- 6.11.6 The operational noise and vibration assessment concludes that no significant noise effects are predicted during the operational phase of the Scheme.
- 6.11.7 During construction, the assessment concludes that activities to construct the solar infrastructure at the Solar PV Site are not predicted to result in significant adverse construction noise and vibration effects. Changes in noise due to construction traffic are assessed as negligible and not significant.
- 6.11.8 For noise generating activities associated with the installation of the cables in the Grid Connection Corridor and Interconnecting Cable Corridor during the daytime, noise and vibration effects are predicted to be not significant. To achieve this at four residential receptors (see R16, R26, R42, R46 on **Figure 11-1, ES Volume 3 [EN010143/APP/6.3]**) the Applicant is committing to an appropriate communication strategy, giving residents prior warning of timings and duration of works, and a noise complaint system. This will be secured through the CEMP (which would be required to be in accordance with the **Framework CEMP [EN010143/APP/7.7]**)
- 6.11.9 The assessment has also considered the Scheme's proposed HDD activities. HDD activities during the day will not generate significant noise and vibration effects at sensitive receptors. A worst case unlikely scenario of the HDD activities having to be continuous overnight due to safety reasons or to avoid daytime disruption to many people has been assessed. The assessment concludes that significant adverse noise and vibration effects are predicted at three receptors (see R43, R45 and R46 on **Figure 11-1, ES Volume 3 [EN010143/APP/6.3]**) due to night time works however additional mitigation measures for HDD activities would be identified once a Principal Contractor has been appointed, to lower the level of impact.
- 6.11.10 The HDD activities will only occur during the construction phase and will not occur during decommissioning. It is not anticipated that the decommissioning of the Scheme would result in significant noise and vibration effects.

Appraisal

- 6.11.11 With the exception of the unlikely scenario of night time HDD activities during construction, significant adverse noise and vibration effects during the construction, operation and decommissioning of the Scheme will be avoided at sensitive receptors. Section 11.6 of **Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1]** explains the mitigation measures which have been incorporated into the Scheme design and the construction methodology to minimise adverse effects where practicable. This includes the use of Best Practicable Means during construction and decommissioning and the choice of plant and location and orientation of noise emitting equipment, such as the Grid Connection Substations and Field Stations, to minimise operational noise at receptors. The Applicant is specifically committing to noise related design principles including no noise generating equipment within 250 m from residential receptors as secured by the **Outline Design Principles Statement [EN010143/APP/7.4]**.
- 6.11.12 A hierarchy of mitigation measures is contained in the **Framework CEMP [EN010143/APP/7.7]** to ensure that the predicted significant noise effects do not occur due to potential HDD night-time works and will be agreed once the Principal Contractor for these works is appointed. The measures include

avoiding HDD works within 200m of residential receptors where practicable; considering the option for open cut cable laying instead of HDD; the potential for using quitter equipment; and the use of temporary acoustic fencing depending on the location, plant and timing of works.

- 6.11.13 The Scheme therefore demonstrates good design with respect to noise in accordance with NPS EN-1 paragraph 5.11.8 (Ref. 3) and draft NPS EN-1 paragraph 5.12.15. (Ref. 2) With embedded mitigation and Scheme design, the Scheme meets the three aims of NPS EN-1 (paragraph 5.11.9) and Draft NPS EN-1 paragraph 5.12.17 during daytime construction, operation and decommissioning and is aiming to avoid significant noise and vibration effects in the unlikely event HDD activities are required at night by implementing the mitigation hierarchy discussed above. Construction mitigation measures will be secured through the CEMP which will be in accordance with the **Framework CEMP [EN010143/APP/7.7]** and for the Scheme design, the **Outline Design Principles Statement [EN010143/APP/7.4]**. The duration of any construction noise effects is also considered to be temporary, short-term, with no permanent residual effect once works are complete.
- 6.11.14 Overall, the Scheme is considered to be in accordance with NPS EN-1, draft NPS EN-1 and local policies with regard to the acceptability of noise and vibration impacts.

6.12 Transport and Access

Planning Policy Context

- 6.12.1 Section 5.13 of NPS EN-1 (Ref. 3) and section 5.14 of Draft NPS EN-1 (Ref. 2) discuss the requirements for considering the potential transport and traffic related impacts and mitigation of NSIPs. Paragraphs 5.13.2 of NPS EN-1 (Ref. 3) and 5.14.4 of Draft NPS EN-1 (Ref. 2) explain the mitigation of such impacts is “*an essential part of Government’s wider policy objectives for sustainable development*”.
- 6.12.2 Paragraph 5.13.3 of NPS EN-1 and paragraph 5.14.5 of Draft NPS EN-1 (Ref. 2) expects applicants to prepare a Transport Assessment if there are significant transport implications of projects. Paragraph 5.13.6 of NPS EN-1 (Ref. 3) and paragraph 5.14.19 of Draft NPS EN-1 explain that the Secretary of State should require significant impacts to be mitigated and paragraph 5.14.21 of Draft NPS EN-1 directs the Secretary of State to “*only consider preventing or refusing development on highways grounds if there would be an unacceptable impact on highway safety, or residual cumulative impacts on the road network would be severe*”.
- 6.12.3 NPS EN-1 paragraph 5.13.10 (Ref. 3) and Draft NPS EN-1 paragraph 5.14.12 (Ref. 2) also require applicants to consider the use of water-borne or rail transport over road transport at all stages of the project, where cost-effective.
- 6.12.4 Specifically for solar development, paragraph 3.10.20 of Draft NPS EN-3 (Ref. 2) expects solar NSIPs to consider the suitability of potential access routes, since solar farms are often located in areas served by the minor roads network.
- 6.12.5 Draft NPS EN-3 (Ref. 2) section 3.10 sets out the Public Rights of Way considerations for Solar schemes and requires the continued use of PRoW

to be considered during operation and construction. It goes onto state that applicants should consider and maximise opportunities to enhance existing rights of way. Paragraph 3.10.26 identifies that *“Public rights of way may need to be temporarily stopped 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”*.

- 6.12.6 Draft NPS EN-3 Paragraph 3.10.29 (Ref. 4) also adds that *“Applicants should consider and maximise opportunities to facilitate enhancements to the public rights of way and the adoption of new public rights of way through site layout and design of access”* and that an outline Public Rights of Way Management Plan should be provided to demonstrate how PRow will be managed.
- 6.12.7 Local Policies S2, S8 EC4 and A4 of the East Riding Local Plan (Ref. 24) and Local Plan Update (Ref. 33), Policies T1 and T2 of the Selby District Local Plan (Ref. 29), Policy SP19 of the Selby District Core Strategy (Ref. 28), and Policies SG10, IC6 and NE7 of the Selby District Local Plan Publication Version (Ref. 34) require an assessment of transport impacts, with some including the requirement for a Transport Assessment where necessary, to ensure that development would not adversely impact the local highway network. Policies A4 of the East Riding Local Plan and Local Plan Update, Policy T8 of the Selby District Local Plan, Policy SP15 and SP19 of the Selby District Core Strategy, and Policy SG9 and IC7 of the Selby District Local Plan Publication Version encourage developments to provide sustainable and active transport options, including walking, cycling and horse riding provision, and providing connections to existing rights of way outside of the development boundary.

Assessment conclusions

- 6.12.8 **Chapter 13: Transport and Access, ES Volume 1 [EN010143/APP.6.1]** presents an assessment of the impacts of the construction traffic resulting from the Scheme on sensitive receptors. The associated Transport Assessment (TA) (**Appendix 13-4, ES Volume 2 [EN010143/APP/6.2]**) considers whether the Scheme will be acceptable in transport and highway terms. The TA provides details of the anticipated characteristics of journeys generated by construction and operation of the Scheme including movements of staff, HGVs and tractor-trailers and the scope of the TA has been agreed with the Local Highway Authorities.
- 6.12.9 Due to low volumes of traffic generated during operation, the operational impacts of the Scheme have been assessed qualitatively. Similarly for the decommissioning stage, given that the number of traffic movements associated with this phase are anticipated to be less than the construction phase, effects have been assessed qualitatively.
- 6.12.10 **Chapter 13: Transport and Access, ES Volume 1 [EN010143/APP.6.1]** and the associated TA (**Appendix 13-4, ES Volume 2 [EN010143/APP/6.2]**) have assumed that the peak construction traffic generated by the Scheme is anticipated to be between Months 1 to 18 of the 24 month construction period, with up to 178 construction worker vehicles, 25 HGVs and 50 tractor/trailers anticipated to be travelling to and from the Scheme daily. No movements associated with the Scheme are anticipated during the network peak hours of the day (08:00-09:00 and 17:00-18:00). Traffic will be

distributed across the five main Construction Compounds during the construction programme (see **Figure 2-4, ES Volume 3 [EN010143/APP.6.3]**). HGVs and tractor/trailers will move around the Site along set routes, and construction workers are expected to travel to the varying compounds taking the fastest route possible to them.

- 6.12.11 During the construction stage, the assessment concludes effects of severance, pedestrian amenity, fear and intimidation and road safety on road users, pedestrians, equestrians and cyclists as well as all road links have all been assessed as not significant. This assumes mitigation measures which are set out in section 13.6 of the **Chapter 13: Transport and Access, ES Volume 1 [EN010143/APP.6.1]** and section 9 of the associated **Transport Assessment (TA) (Appendix 13-4, ES Volume 2 [EN010143/APP/6.2]** are implemented. These measures include the implementation of a Construction Traffic Management Plan (CTMP); effective access points and construction routes; maintaining access to PRow; restricting HGV movements to certain routes and certain times of the day; encouraging construction worker car sharing and implementing a shuttlebus service; providing bankmen at construction compound access points to ensure safe vehicle movements.
- 6.12.12 With regard to increase in total traffic, of the 19 road links assessed for traffic impacts within **Chapter 13: Traffic and Transport, ES Volume 1 [EN010143/APP.6.1]** a residual significant adverse effect is anticipated at only one link road - Link 15 - the B1228 (Station Road). This will see the most traffic associated with the Scheme travelling this route, with an additional 216 construction worker vehicles passing through when arriving to or leaving the Site and an increase in HGVs.
- 6.12.13 As a result of the low levels of operational traffic, the assessment concludes effects are predicted to be negligible for all potential impacts (total traffic increase (including HGV increase), severance, driver delay, accidents and safety, and fear and intimidation) and therefore not significant. The TA confirms that it is expected there would be sufficient capacity on the road network to accommodate the additional trips proposed by the construction of the Scheme.
- 6.12.14 Decommissioning effects are anticipated to be comparable (though likely to be an overestimate of the effects) to construction. Therefore the assessment concludes that decommissioning is expected to be negligible for all potential impacts (total traffic increase (including HGV), severance, driver delay, accidents and safety, and fear and intimidation) except for at Links 5 and 15 where minor to moderate effects could be expected.

Appraisal

- 6.12.15 Access during construction, operation and decommissioning of the Scheme will not result in significant adverse effects on road users, pedestrians, equestrians or cyclists and road links in terms of severance, delay, amenity, fear and intimidation, or accidents and safety. With regard to total traffic and HGV increase a residual significant adverse effect is expected at only one road link – Link 15 the B1228 (Station Road) due to the level of traffic generated by construction workers.
- 6.12.16 Impacts on the local highway network during the construction phase would be temporary and would be managed through the embedded mitigation measures described above. This includes the preparation of a CTMP

secured by requirement 13 of the DCO (see **draft DCO [EN010143/APP.3.1]**) which is required to be in accordance with the **Framework CTMP (Appendix 13-5, ES Volume 2 [EN010143/APP/6.2])**. The Framework CTMP at Annex A includes access designs, visibility splays and swept path analysis demonstrating the proposed accesses are suitable for their intended use.

- 6.12.17 There will be no PRow closures as a result of the Scheme and all PRow receptors within the Order limits will be physically separated from construction works, including traffic route where practicable and relevant. A limited number of temporary diversions and crossing points are required for PRow affected by the installation of solar PV infrastructure and cabling. The **Framework Public Rights of Way Management Plan [EN010143/APP.7.13]** explains the details of the temporary short term diversions and appropriate measures for the management of PRow during the various stages of the Scheme.
- 6.12.18 The Scheme is proposing to enhance access through the Solar PV Site during the operational phase for pedestrians and horse riders by providing permissive paths which allow travel by horses. These routes will be available to the public during the operational life of the Scheme and are described in section 5.6 of this Planning Statement.
- 6.12.19 In response to NPS EN-1 paragraph 5.13.10 (Ref. 3) and Draft NPS EN-1 paragraph 5.14.12 (Ref. 2), the Order limits include the Hull to Selby railway line and Rivers Ouse and Derwent however it is not considered feasible to transport equipment and materials via rail or waterborne transport. The railway north and south of Solar PV Areas 3b and 3c provides mainline passenger services and there is no freight siding along this section. It is therefore not considered to be viable for serving the Scheme in terms of delivering equipment or materials.
- 6.12.20 In summary, with the implementation of appropriate mitigation measures, including a CTMP, traffic generated by the Scheme is not expected to result in any significant adverse environmental effects except at Link 15 during construction and decommissioning due to the total traffic increase which cannot be mitigated further. It is also not expected that the Scheme will have a significant impact on the strategic or local highway networks in terms of their capacity and highway safety. Effects resulting from the temporary diversion a limited number of PRowS during construction activities within the Solar PV Site, Interconnecting Cable Corridor and Grid Connection Corridor are short term and will be managed appropriately in accordance with the **Framework Public Rights of Way Management Plan [EN010143/APP.7.13]**. The provision of new permissive paths within the Solar PV Site will also provide a benefit to local recreational users by increasing public access and improving connectivity of the existing PRow network.
- 6.12.21 Overall, the Scheme would not have an unacceptable impact on highway safety and is therefore in accordance with the transport and access policies of NPS EN-1, Draft NPS EN-1, Draft NPS EN-3 and local plan policies.

6.13 Socio-economic Impacts and Health

Planning Policy Context

- 6.13.1 Section 5.12 of NPS EN-1 (Ref. 3) and Section 5.13 of Draft NPS EN-1 (Ref. 2) sets out the socio-economic considerations for energy projects. Paragraphs 5.12.2 and 5.12.4 of NPS EN-1 require the Applicant to undertake an assessment of socio-economic impacts at local or regional levels as part of the ES.
- 6.13.2 Paragraph 5.12.5 of NPS EN-1 (Ref. 3) explains that socio-economic impacts may be linked to other impacts, for example the visual impact of a development, which may impact on tourism and local business.
- 6.13.3 Draft NPS EN-1 (Ref. 2) (paragraph 5.13.4) also adds that the assessment should consider, and 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”, as well as “the contribution to the development of low-carbon industries at the local and regional level as well as nationally”*.
- 6.13.4 Paragraph 5.12.8 and 5.12.9 of NPS EN-1 (Ref. 3), and paragraphs 5.13.9 and 5.13.11 set out that the decision maker should consider relevant positive provisions to mitigate any impacts, and any legacy benefits that may arise. Paragraph 5.12.9 states that *“high quality design can improve the visual and environmental experience for visitors and the local community alike”*.
- 6.13.5 Paragraph 5.13.12 of Draft NPS EN-1 (Ref. 2) adds that an *“employment and skills plan detailing arrangements to promote local employment and skills development opportunities...”* may be included as a requirement if the Secretary of State wishes.
- 6.13.6 Human health is also a consideration in the Energy NPSs and relates to socio-economic impacts. Paragraph 4.13.2 of NPS EN-1 (Ref. 3) states that the ES should provide an assessment of effects on human beings, *“identifying any adverse health impacts, and identifying measures to avoid, reduce or compensate for these impacts as appropriate”*, in isolation and cumulatively.
- 6.13.7 Paragraph 4.13.3 of NPS EN-1 (Ref. 3) states that *“direct impacts on health may include traffic, air or water, pollution, dust, odour, hazardous waste and substances, noise, exposure to radiation, and increases in pests”*.
- 6.13.8 Local planning policies support sustainable economic growth; the achievement of healthy, inclusive and safe places; and the protection of existing land uses. Specifically, Policy EC1 of the East Riding Local Plan (Ref. 24) and East Riding Local Plan Update (Ref. 33) support the Growth and Diversification of the East Riding Economic Proposals will be encouraged where they strengthen East Riding’s key employment sector, including renewable energy. Policy EC5 states that proposals for the development of renewable energy will be supported where benefits outweigh any adverse impacts and adverse impacts are satisfactorily addressed. Similar policies are contained within Policy SP17 of the Selby District Core Strategy (Ref. 28) and EM3 and EM4 of the Selby District Council Local Plan Publication Version (Ref. 34).

Assessment conclusions

- 6.13.9 **Chapter 12: Socio Economic and Land Use, ES Volume 1 [EN010143/APP/6.1]** presents an assessment of socio-economic effects of the Scheme during construction, operation and decommissioning, including upon employment, the local economy, local accommodation, gross value added, public rights of way and private and community assets.
- 6.13.10 **Chapter 14: Human Health, ES Volume 1 [EN010143/APP/6.1]** presents an assessment of likely effects of the Scheme on human health.

Employment and local accommodation

- 6.13.11 **Chapter 12: Socio Economic and Land Use, ES Volume 1 [EN010143/APP/6.1]** presents the temporary annual employment generated by the Scheme, accounting for leakage, displacement, and multiplier effects. It states that the Scheme will support, on average, 401 total net jobs per annum during the construction period. Of these, 181 jobs per annum will be expected to be taken up by residents within the local area. This result in a beneficial effect.
- 6.13.12 During construction, at peak workforce employment and typical seasonal occupancy levels, 100% of the Scheme's construction workers could be accommodated within both a 30 and 60-minute drive time of the Site. Given this, there would be no effect on the hotel, bed and breakfast, and inns accommodation sector arising from the Scheme.
- 6.13.13 Decommissioning effects would be similar to construction effects, however once the Scheme is decommissioned, it is assumed that the net change in employment would be zero as it is likely that agricultural employment would be supported.
- 6.13.14 During operation, the Applicant has estimated that to operate and manage the Scheme there will be a gross number of three permanent jobs generated. This would result in no net change in comparison to existing agricultural employment, resulting in no effect with regard to operational employment. There would also be no effect on local accommodation during the operation of the Scheme.
- 6.13.15 **A Framework Skills, Supply Chain and Employment Plan (FSSCEP) [EN010143/APP/7.15]** has been prepared to maximise and pro-actively expand the economic benefits of the Scheme for the local community. This will inform a detailed FSSCEP and be secured by a requirement of the DCO.
- 6.13.16 The jobs created will be in the renewable energy sector, specifically relating to solar installation, but also electricity transmission. Where possible, there will be a preference for local staffing, and it is likely that the appointed contractors will employ trainees and apprentices as part of the construction workforce.

Gross Value Added (GVA)

- 6.13.17 **Chapter 12: Socio-economics and land use, ES Volume 1 [EN010143/APP/6.1]** assesses the contribution of the Scheme to the economy by considering the GVA of the Scheme. The assessment predicts the total GVA arising from the construction period. In Yorkshire and the Humber, GVA per worker in the construction sector is estimated to be £63,314 per head. By applying this figure to the total direct construction

workers generated by the Scheme, it is estimated that construction will contribute approximately £22.5 million to the national economy, of which £10.1m would likely be within the Study Area. This is a beneficial effect .

6.13.18 The cumulative effect on the economy is assessed to be beneficial.

PRoW

6.13.19 During construction, no PRoW within the Solar PV Site would be impacted. PRoW that are crossed by the Grid Connection Corridor and Interconnecting Cable Corridor would remain open (likely managed through traffic management measures) although routes may be slightly diverted temporarily for a short period, for example moving from one side of a road to the other. The **Framework Public Rights of Way Management Plan [EN010143/APP.7.13]** explains the details of the temporary short term diversions and management of PRoW during the various stages of the Scheme.

6.13.20 Given these limited impacts, and the fact that no national trails or national cycle routes fall within the Solar PV Site; PRoW are not used to access employment; and there is a network of alternative PRoW within the local area that could be used as substitutes, impacts to PRoW during construction are assessed to be very low, and are not considered significant.

6.13.21 During operation, two Permissive Paths to enhance the current PRoW network will be provided as part of the Scheme as set out in detail in Section 6.11 of this Planning Statement. Given that there are no expected permanent closures or diversions, and that new Permissive Paths will be available, the impact on users of PRoW results in a beneficial effect. The Scheme design also provides a minimum buffer of 15 m from the centreline of existing PRoW to the perimeter fence of the solar infrastructure to be maintained with 20 m provided either side of centreline if solar PV infrastructure is either side of the PRoW.

Private and Community Assets

6.13.22 The assessment of impacts on private and community assets takes account of the results of the noise, traffic, visual and air quality assessments.

Chapter 12: Socio-economics and land use, ES Volume 1

[EN010143/APP/6.1] concludes that there are no residents, businesses or community facilities that would likely experience a significant effect during construction in relation to more than one of these topics (Transport, as set out in Section 7.11 of this Planning Statement). Therefore, at this stage there are expected to be no amenity impacts arising from the Scheme on these local assets during construction.

6.13.23 In terms of cumulative impacts, **Chapter 12: Socio-economics and land use, ES Volume 1 [EN010143/APP/6.1]** states that as the construction phase of the Scheme could coincide with that of other developments which overlap the Grid Connection Corridor, the Applicant has met with National Grid and Drax Power to liaise on construction timings and minimise potential disruption to their schemes. Going forward, the Applicant will continue to work with scheme promoters to share information on the construction process and timing of the Scheme as required, so that any potential for hinderance of or conflict with other schemes is minimised.

- 6.13.24 Given that there would be no direct land take aside from potential temporary impacts on two businesses and one residential premises within the Order limits as a result of limited construction vehicles; no amenity impacts; some connectivity impacts; and limited potential for interference with overlapping developments during the construction of the Scheme, as set out in **Chapter 12: Socio-economics and land use, ES Volume 1 [EN010143/APP/6.1]**, no significant adverse socio economic and land use effects are anticipated. In addition, no significant cumulative effects are anticipated.
- 6.13.25 There would be no effect on private and community assets during the operation of the Scheme.

Human Health

- 6.13.26 **Chapter 14: Human Health, ES Volume 1 [EN010143/APP/6.1]** sets out an assessment of impacts on human health based on the IEMA guidance 'Determining Significance for Human Health in Environmental Impact Assessment' (Ref. 63) as well as NHS England's Healthy Urban Development Unit's (HUDU) Rapid Health Impact Assessment (HIA) Toolkit 2019 (Ref. 64). The assessment takes account of effects on healthcare services/infrastructure, social infrastructure, noise and vibration, air pollution and dust, access to open space and active travel, access to employment and training and social cohesion and neighbourhoods. It also considers impacts to human health from flood risk and landscape and visual amenity.
- 6.13.27 The assessment concludes that during construction, there may be an increase in people registering at GP's and local healthcare services, if workers reside locally. In addition, construction transport impacts anticipated from construction worker vehicles using Link 15 (as set out in section 6.11 of this Planning Statement and **Chapter 13: Transport and Access, ES Volume 1 [EN010143/APP/6.1]**) may also inhibit local residents' ability to access healthcare facilities. However, it is judged that these impacts would be low and therefore not significant.
- 6.13.28 The construction transport impacts of construction worker vehicles using Link 15 are also considered in relation to social infrastructure, noise and vibration, access to open space and active travel, access to employment and training and social cohesion and neighbourhoods. Only minor adverse effects are anticipated in relation to these receptors, which are not significant. This is because these impacts are temporary, and not likely to lead to major changes in quality of life for the majority of the population.
- 6.13.29 The assessment also considers the impacts of noise identified in **Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1]**. It concludes that these works would be temporary and based on worst case scenarios therefore, no significant impact are anticipated on human health as a result.
- 6.13.30 **Chapter 14: Human Health, ES Volume 1 [EN010143/APP/6.1]** concludes that flood risk and landscape and visual impacts are also not considered to be significant during the construction, as any effects are short term and temporary.
- 6.13.31 During the operation of the Scheme, as there would be limited transport impacts and no net change in employment there is anticipated to be a negligible effect on healthcare services, social infrastructure, air pollution, noise pollution, access to employment and training and social cohesion. In terms of landscape impacts relating to tranquillity and quality of life, **Chapter**

14: Human Health, ES Volume 1 [EN010143/APP/6.1] concludes that given that a low number of viewpoints, residents and PRow users will be affected and by operation year 15 there are not considered to be significant effects, the likely effect on human health arising from impacts on landscape and visual amenity during the operation of the Scheme are also not significant.

6.13.32 There would be a beneficial effect on access to open space and active travel as a result of the two permissive paths being proposed by the Scheme as discussed in Section 5 of this Planning Statement.

6.13.33 Decommissioning effects are anticipated to be similar to construction impacts.

Appraisal

6.13.34 **Chapter 12: Socio-economics and Land Use, ES Volume 1 [EN010143/APP/6.1]** concludes that the construction and decommissioning phases of the Scheme will have a beneficial impact on employment, through the creation of a total net employment of 401 jobs per annum, with 181 jobs per annum expected to be taken up by residents within the local area. In addition, it is estimated that construction will contribute approximately £22.5 million to the national economy, of which £10.1m would likely be within the local region.

6.13.35 The jobs created will be in the renewable energy sector, specifically relating to solar installation, but also electricity transmission, and supply chain. As such, they will contribute to the development of skills needed for the UK's transition to net zero by 2050 (as required by the Climate Change Act 2008 (2050 Target Amendment Order) 2019 (Ref. 45) and described within the Net Zero Strategy: Building Back Greener (Ref. 40).

6.13.36 **A Framework Skills, Supply Chain and Employment Plan [EN010145/APP/7.15]** has been prepared and includes measures to maximise and pro-actively expand the economic benefits of the Scheme for the local community.

6.13.37 **Chapter 12: Socio-economics and Land Use, ES Volume 1 [EN010143/APP/6.1]** and **Chapter 14: Human Health, ES Volume 1 [EN010143/APP/6.1]** also concludes that beneficial effects are anticipated on PRow during the operation of the Scheme, with the introduction of two new Permissive Paths.

6.13.38 No significant adverse effects are assessed in relation to local accommodation, private and community assets or human health as a result of the construction, operation or decommissioning of the Scheme.

6.13.39 In summary, the construction of the Scheme would contribute to the local economy, and the development of low-carbon industries at the local and regional level as well as nationally through upskilling workers in the renewable energy sector. During its operation, it would provide two new permissive paths that would have beneficial impacts to health and wellbeing of local users.

6.13.40 Overall, the Scheme is therefore in accordance with the socio-economic and health policies of NPS EN-1, draft NPS EN-1 and relevant local plans.

6.14 Mineral Safeguarding

Planning Policy Context

- 6.14.1 The Scheme is partly located within East Riding of Yorkshire's Minerals Safeguarding Area (MSA) EC6 and an (unnamed) area of safeguarded surface mineral resource in North Yorkshire as shown on the East Riding of Yorkshire Joint Minerals Plan Policies Map (Ref. 65) and the North Yorkshire Minerals and Waste Joint Plan and policies map (Ref. 66). Extracts of these maps are provided at **Appendix D** of this Planning Statement
- 6.14.2 Paragraph 5.10.9 of NPS EN-1 (Ref. 3) and paragraph 5.11.19 of Draft NPS EN-1 (Ref. 2) state that 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. Paragraph 5.10.22 of NPS EN-1 (Ref. 3) and paragraph 5.11.28 of Draft NPS EN-1 (Ref. 2) further add that the decision maker should ensure that appropriate mitigation measures have been put in place to safeguard mineral resources in the event that a proposed development has an impact on an MSA.
- 6.14.3 The East Riding Local Plan 2012-2029 Strategy Document (Ref. 24) policy EC6 Protecting mineral resources states that *“development, within or adjacent to Mineral Safeguarding areas, which would affect the viability of exploiting the deposit in the future will only be supported if it can be demonstrated that:*
- a. *1. Underlying or adjacent mineral is of limited economic value;*
 - b. *2. Need for the development outweighs the need to safeguard the mineral deposit;*
 - c. *3. Non-mineral development can take place without preventing the mineral resource from being extracted in the future;*
 - d. *4. Non-mineral development is temporary in nature; or*
 - e. *5. Underlying or adjacent mineral deposit can be extracted prior to the non-mineral development proceeding, or prior extraction of the deposit is not possible.*
- 6.14.4 The East Riding of Yorkshire and Kingston upon Hill Joint Minerals Local Plan 2016-2033 (Ref. 27) and the East Riding Local Plan Update 2020-2039 (Ref. 33) includes Policy EC6 as worded in the Local Plan Strategy.
- 6.14.5 Policy S01 – Safeguarded surface mineral resources in the Minerals and Waste Joint Plan for North Yorkshire County Council, North Yorkshire Moors National Park Authority and City of York Council (2022) (Ref. 30) identifies the resources which are safeguarded as identified on the policies map. Policy S02 provides that permission will only be granted within safeguarded surface minerals resource areas where:
- a. *A. It would not sterilise the mineral or prejudice future extraction; or*
 - b. *B. The mineral will be extracted prior to the development (where this can be achieved without unacceptable impact on the environment or local communities), or*
 - c. *C. The need for the non-mineral development can be demonstrated to outweigh the need to safeguard the mineral; or*

- d. *D. It can be demonstrated that the mineral in the location concerned is no longer of any potential value as it does not represent an economically viable and therefore exploitable resource; or*
- e. *E. The non-mineral development is of a temporary nature that does not inhibit extraction within the timescale that the mineral is likely to be needed; or*
- f. *F. It constitutes 'exempt' development (as defined in the Safeguarding Exemption Criteria list), as set out in paragraph 8.55).*

Appraisal

- 6.14.6 The majority of the land within the Order limits is located outside Mineral Safeguarding Areas (MSA). Small areas of Solar PV Area 1a and Solar PV Area 3c and small parts of the Site Accesses and the Grid Connection Corridor (which lie within the administrative area of East Riding of Yorkshire Council) are located within East Riding of Yorkshire's Minerals Safeguarding Area (MSA) EC6. Parts of the Grid Connection Corridor and Site Accesses within North Yorkshire are located within an area of safeguarded surface mineral resource (the minerals being described as Brick Clay and Sand and Gravel).
- 6.14.7 **Chapter 12: Socio economics and land use, ES Volume 1 [EN010143/APP/6.1] and Appendix 12-2 Communications with Minerals Planning Authorities, ES Volume 2 [EN010143/APP/6.1]** explain that the impact of the Scheme on minerals was scoped out of the environmental impact assessment in agreement with the East Riding of Yorkshire Council as Mineral Planning Authority and North Yorkshire Council Mineral Planning Authority.
- 6.14.8 The Scheme demonstrates accordance with the requirements 3 and 4 of Policy EC6 in the East Riding of Yorkshire minerals plan and adopted and emerging local plans and A of Policy S02 of the North Yorkshire Minerals and Waste Joint Plan as:
- a. the Scheme can be constructed, operated and decommissioned without preventing the mineral resource from being extracted in the future. The construction of the Scheme is also minimally invasive and would not therefore impact the underlying geology. In addition, due to the flat topography of the proposed site no significant earthworks are proposed. The location for the Grid Connection Substations that may not be decommissioned is outside the mineral safeguarding area. For the Grid Connection Cable, which may also not be decommissioned, the cable trench is only up to 1.5 m wide and where practicable the route of the Grid Cables will follow field boundaries thereby not preventing the mineral within the MSA being extracted in the future;
 - b. the mineral deposits affected by the Scheme in the Solar PV Areas will not be permanently sterilised by the Scheme and can be extracted, if required, after its decommissioning. Decommissioning will commence 40 years after the Scheme's final commissioning as secured by requirement 18 of the **Draft DCO [EN010143/APP/3.1]**.
- 6.14.9 Given the above, the Scheme would not impact mineral resources and safeguards mineral resources within the Order limits by not preventing the extraction of mineral in the future after any decommissioning has taken

place, in accordance with NPS EN-1, draft NPS EN-1, East Riding of Yorkshire Policy EC6 and North Yorkshire's Minerals and Waste Plan Policy S02. In summary, the Scheme complies with national and local mineral safeguarding policies.

6.15 Other construction, operation and decommissioning impacts

6.15.1 Other impacts of the Scheme during its construction, operation and decommissioning have been identified and are assessed and discussed in the **Chapter 16: Other Environmental Topics, ES Volume 1 [EN010143/APP/6.1]**. The impacts below have associated relevant national and local planning policies:

- a. air quality;
- b. glint and glare;
- c. ground conditions;
- d. major accidents and disasters;
- e. materials and waste; and
- f. Electric and Electro-magnetic Fields (EMF).

6.15.2 The following sections discuss the relevant planning policy, assessment conclusions and appraise planning policy compliance for each topic.

Air Quality

Planning Policy Context

6.15.3 Paragraph 5.2.9 of NPS EN-1 (Ref. 3) explains that regarding decision making, substantial weight should be given to air quality considerations where a project would lead to a deterioration in air quality in an area. It also states that *“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 national air quality limits.”*

6.15.4 NPS EN-1 Paragraphs 5.6.4 (Ref. 3) and draft NPS EN-1 paragraph 5.7.5 require consideration to be given to the potential for dust impacts and the effect on amenity.

6.15.5 Both NPS EN-1 (Ref. 3) and draft NPS EN-1 (Ref. 2) at paragraph 5.2.11 state 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”*.

6.15.6 With regard to local policy, Policy NE7 of the Selby District Council Local Plan Publication Version (Ref. 34) explains that development will not be supported where it would result in significant air quality deterioration. Policy EC5 and ENV6 of the East Riding Local Plan (Ref. 24) and East Riding Local Plan Update (Ref. 33) require impacts relating to air quality to be acceptable. Policy EMP10 of the Selby District Local Plan (2005) states that developments close to Drax Power Station should not create environmental problems associated with dust emissions.

Assessment conclusions and appraisal

6.15.7 Chapter 16: Other Environmental Topics, ES Volume 1

[EN010143/APP/6.1] assesses impacts of the Scheme on local air quality.

6.15.8 During construction, there is potential for the Scheme to generate dust and therefore impact local sensitive receptors. The adoption of good site practice will be implemented through measures to control dust as outlined within the IAQM guidance. As decommissioning operations are predicted to be similar to construction, the same good practice measures are predicted to apply.

6.15.9 These embedded good or standard practice mitigation measures are set out in the **Framework CEMP [EN/010143/APP/7.7]** submitted with the DCO Application. Implementation of these measures will be secured through the provision of a detailed CEMP as a requirement of the DCO. A **Framework DEMP [EN/010143/APP/7.9]** is also submitted with the DCO Application with the detailed DEMP to be prepared prior to the start of decommissioning, secured by a requirement of the DCO.

6.15.10 Chapter 16: Other Environmental Topics, ES Volume 1

[EN010143/APP/6.1] concludes that the implementation of the mitigation measures is expected to prevent the occurrence of significant effects arising from dust generation during the construction phase. Residual effects are therefore assessed as being not significant for construction and decommissioning. No air quality effects are anticipated during the operation of the Scheme.

6.15.11 In summary, impacts on air quality from the Scheme can be appropriately controlled to acceptable standards. The Scheme is therefore in accordance with NPS EN-1, draft NPS EN-1 and relevant local planning policies.

Glint and Glare

Planning Policy Context

6.15.12 Section 5.4 of NPS EN-1 (Ref. 3) and Section 5.5 of draft NPS EN-1 require consideration of effects on civil or military aviation and/or other defence assets including civil, military aerodrome and aviation technical sites.

6.15.13 Draft NPS EN-3 (Ref. 2) paragraph 3.10.94 states that “*Applicants should map receptors to qualitatively identify potential glint and glare issues and determine if a glint and glare assessment is necessary as part of the application*”. It states that where a quantitative glint and glare assessment is necessary, applicants are expected to “*provide an assessment of potential impact and impairment based on the angle and duration of incidence and the intensity of the reflection*”.

6.15.14 Paragraph 3.10.149 of Draft NPS EN-3 (Ref. 4) states that consideration should be given to the impact on homes, motorists, PRow and aviation infrastructure when assessing glint and glare impacts.

6.15.15 Draft NPS EN-3 (Ref. 4) also add that “*there is no evidence that glint and glare from solar farms results in significant impairment on aircraft safety*” (Paragraph 3.10.150), and unless there is a significant impairment demonstrated the effect of glint and glare on aviation receptors is unlikely to have significant weight.

Assessment conclusions and appraisal

6.15.16 Chapter 16: Other Environmental Topics, ES Volume 1

[EN010143/APP/6.1] and supporting **Appendix 16-2 Glint and Glare Assessment, ES Volume 2 [EN010143/APP/6.2]** provides an assessment of glint and glare effects of the Scheme based on the angle and duration of incidence and the intensity of the reflection of the solar PV panels. It states that embedded mitigation, particularly the technology proposed, which is single axis tracker panels, is considered adequate to avoid likely significant effects on glint and glare. This results in no impacts anticipated on PROW, residential, road or rail receptors as a result of solar reflections.

6.15.17 It also concludes that impacts upon the users of the River Derwent and Ouse are unlikely to occur, but if they were to, they would be no greater than negligible and not significant.

6.15.18 Four runway approach paths and one air traffic control tower were assessed in detail at Brighton Airfield and Leeds East Airport. Only 'Green Glare' impacts (which is where there is a low potential for an 'after image') were predicted for Runway 28 at Brighton Airfield, which is an acceptable impact upon runways according to FAA guidance (Ref. 67). The other receptors experience none. Overall the assessment concludes aviation impacts are not significant.

6.15.19 In summary, impacts of glint and glare from the Scheme are acceptable and not significant. The Scheme is therefore in accordance with NPS EN-1, draft NPS EN-1 and draft NPS EN-3.

Ground Conditions

Planning Policy Context

6.15.20 Paragraph 4.10.7 of NPS EN-1 (Ref. 3) states that the decision maker should be satisfied that the relevant pollution control authority is satisfied that potential impacts can be adequately regulated under the pollution control framework, and that cumulative impacts are acceptable.

6.15.21 Paragraph 5.11.17 of Draft NPS EN-1 (Ref. 2) states that "*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*".

6.15.22 Paragraph 3.10.19 of Draft NPS EN-3 (Ref. 4) states that "*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*".

6.15.23 At the local level policy requires consideration of groundwater pollution, contamination and soil resources. In particular, Policy ENV2 Selby District Local Plan (Ref. 29) and NE8 of the Selby District Council Local Plan publication version (Ref. 34) both state that development will not be permitted if adverse effects are not satisfactorily remedied or prevented. Policy ENV6 of the Adopted East Riding Local Plan (Ref. 24) and East Riding Local Plan Update (Ref. 33) require development to manage the risk of ground water pollution.

Assessment conclusions and appraisal

6.15.24 Chapter 16: Other Environmental Topics, ES Volume 1 [EN010143/APP/6.1] assesses the impact of the Scheme on ground conditions. A Phase 1

Preliminary Risk Assessment (PRA) (**Appendix 16-2, ES Volume 2 [EN010143/APP/6.2]**) has been carried out for the Scheme. This is equivalent to a Stage 1 Tier 1 level of assessment, as defined by the Environment Agency's Land Contamination Risk Management (LCRM) (2020) guidance (Ref. 68). The Phase 1 PRA identifies and evaluates potential land quality risks and development constraints associated with the Scheme and provides an initial Conceptual Site Model (CSM) that can be used to inform future decision making and the design of future ground investigation which may be required.

- 6.15.25 The Phase 1 PRA proposes limited intrusive investigation to confirm the findings of the assessment which may be included as part of geotechnical scope of works. An intrusive site investigation and Generic Quantitative Risk Assessment is proposed in the areas of potential contamination.
- 6.15.26 The assessment concludes that, the Scheme is not considered to pose an unacceptable risk to human health or the environment either during construction, during operation or decommissioning, and no significant effects are anticipated. This is on the assumption that implementation of the recommendations of the Generic Quantitative Risk Assessment (to be completed post-consent), as set out in the **Framework CEMP [EN010143/APP/7.7]**, are included in the detailed CEMP, along with environmental design and management measures.
- 6.15.27 **A Framework Soil Management Plan (SMP) [EN0100143/APP/7.10]** is also submitted with this DCO Application and sets out appropriate measures to minimise soil loss and manage pollution and biosecurity risk. Delivery of the detailed SMP prior to construction will be secured through a requirement of the DCO.
- 6.15.28 In terms of cumulative effect, the assessment concludes that provided that the requirements of relevant policy and legislation relating to land contamination and remediation are integrated within the design and appropriate mitigation measures are applied during the demolition and construction phases of each development, impacts to ground conditions will be controlled, therefore no significant impacts are anticipated.
- 6.15.29 In summary, impacts of the Scheme on ground conditions can be appropriately controlled to acceptable standards and further investigation will be undertaken if required to understand potential areas of contamination within the Site. The Scheme is therefore in accordance with NPS EN-1, draft NPS EN-1 and relevant local planning policies regarding potential impacts on ground conditions.

Major Accidents and Disasters

Planning Policy Context

- 6.15.30 The EIA Regulations require assessment of the potential effects of the Scheme on the environment as a result of the vulnerability of the Scheme to risks of major accidents or disasters which are relevant to the Scheme.
- 6.15.31 As the energy NPSs were published in 2011, they pre-date the existing EIA Regulations. The NPPF (Ref. 18) does refer, at paragraph 97, to the fact that: "*Planning policies and decisions should promote public safety and take into account wider security and defence requirements by: a) anticipating and addressing possible malicious threats and natural hazards*", and taking

“appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security”

6.15.32 Draft NPS EN-1 paragraph 4.12.5 (Ref. 2) expects applicants to consult with the Health and Safety Executive on matters relating to safety.

Assessment conclusions and appraisal

6.15.33 **Chapter 16: Other Environmental Topics, ES Volume 1**

[EN010143/APP/6.1] sets out that the Applicant has consulted with the Health and Safety Executive in relation to safety who have confirmed the location of the Scheme crossing consultation zones for two Major Accident Hazard (MAH) Sites as well as three MAH pipelines. **Chapter 16: Other Environmental Topics, ES Volume 1 [EN010143/APP/6.1]** assesses the vulnerability of the Scheme to a major accident at these sites along with other potential hazards.

6.15.34 All construction and decommissioning works will be subject to risk assessments as required by the **Framework CEMP [EN010143/APP/7.7]** and the **Framework DEMP [EN010143/APP/7.9]** which will minimise the risk of impacts from hazards such as fire or HDD failure. Mitigation measures to be implemented during construction and decommissioning are listed within the Framework CEMP and DEMP respectively, which will be secured by requirements in the DCO.

6.15.35 During construction and decommissioning the Scheme would temporarily introduce construction workers into the consultation zones of the MAH sites/pipelines listed above. Consultation zones around MAH sites and pipelines are defined by the HSE after assessing the risks and likely effects of major accidents. Employees of the Scheme are considered to be ‘normal working population’ who are fit and healthy and could be easily organised for emergency action. No members of the public will be present within the working areas. Working hours will be restricted (as discussed in Section 4 of this Planning Statement) and there will be no staff who will be ‘resident’ (sleeping on site overnight). The Scheme is therefore considered to represent lowest level of sensitivity and consequently the risk to the workforce due to the proximity of these sites is not considered to be significant.

6.15.36 **Chapter 16: Other Environmental Topics, ES Volume 1**

[EN010143/APP/6.1] concludes that in the highly unlikely event that a major accident and disaster does occur, the significance of the effect would correlate to the scale of the major accident and disaster event. The focus is on prevention of major accidents and disasters, and mitigation if an event does occur. Taking into account the good industry practice and additional mitigation measures discussed above, the risk of accidents and disasters is considered low, resulting in no significant effects on the environment or people.

6.15.37 The Scheme through its proposed control measures has taken appropriate consideration of the potential for major accidents and hazards and how to reduce the chance of them occurring to ensure public safety. The Scheme is therefore considered to accord with the NPPF.

Materials and Waste

Planning Policy Context

- 6.15.38 NPS EN-1 (Ref. 3) paragraph 5.14.6 states that “*the applicant should set out the arrangements that are proposed for managing any waste produced and prepare a Site Waste Management Plan*”. It continues that an assessment should be undertaken of the waste arising from the development and seek to minimise the volume of waste produced and sent for disposal.
- 6.15.39 Draft NPS EN-1 (Ref. 2) section 5.15 sets out considerations with regards to resources and waste management. Paragraph 5.15.2 states that “*Sustainable waste management is implemented through the waste hierarchy, which sets out the priorities that must be applied when managing waste.*”
- 6.15.40 Paragraph 5.15.15 of Draft NPS EN-1 (Ref. 2) states that the “*Secretary of State should be satisfied that waste will be properly managed, both on-site and off-site, can be dealt with appropriately by the waste infrastructure which is, or is likely to be, available, and have no adverse effect on the capacity of existing waste management facilities to deal with other waste arisings in the area*”.
- 6.15.41 Policy ENV1 of the East Riding Local Plan (Ref. 24) and East Riding Local Plan Update (Ref. 33), and City of York Council, North York Moors National Park Authority and North Yorkshire County Council Minerals and Waste Local Plan (Policy W01) (Ref. 30) require development to manage construction waste, waste generated from the use of the development, and accord with the mitigation hierarchy. Policy ENV1 of the East Riding Local Plan (Ref. 24) and East Riding Local Plan Update (Ref. 33) also consider incorporating energy efficient design and arrangements to manage waste.

Assessment conclusions and appraisal

- 6.15.42 **Chapter 16: Other Environmental Topics, ES Volume 1 [EN010143/APP/6.1]** sets out the arrangements that are proposed for managing any waste produced by the Scheme, in accordance with the waste hierarchy, and is accompanied by a **Framework Site Waste Management Plan (SWMP), Appendix 16-4, ES Volume 2 [EN010143/APP/6.1]**. The Framework SWMP sets out measures to support the Scheme during construction in moving waste up the waste hierarchy and meeting other legal, policy and best practice requirements.
- 6.15.43 **Chapter 16: Other Environmental Topics, ES Volume 1 [EN010143/APP/6.1]** concludes that there would be no significant impacts relating to materials and waste during construction, operation or decommissioning. The Applicant is committed to properly managing waste, both on-site and off-site, and deal with it appropriately by the waste infrastructure available. It also concludes that the Scheme would have no adverse effect on the capacity of existing waste management facilities to deal with other waste arisings in the area.
- 6.15.44 The decommissioning of the Scheme will be subject to measures and procedures defined within a DEMP as secured through the DCO; a **Framework DEMP [EN010143/APP/7.9]** is included alongside the DCO Application. Requirement 18 of the DCO also requires that the DEMP

include a resource management plan with details of proposals to minimise the use of natural resources and unnecessary materials.

6.15.45 In summary, impacts of the Scheme in relation to materials and waste can be appropriately controlled through management plans. The Scheme is therefore in accordance with NPS EN-1, draft NPS EN-1 and relevant local planning policies regarding potential impacts on ground conditions.

Electric and Electro-magnetic Fields (EMF)

Planning Policy Context

6.15.46 Paragraph 2.10.13 of NPS EN-5 (Ref. 16) sets out that “*in order to avoid unacceptable adverse impacts of EMFs from electricity network infrastructure on aviation, the IPC should take account of statutory technical safeguarding zones defined in accordance with Planning Circular 01/0327*”.

6.15.47 Paragraph 2.11.12 of Draft NPS EN-5 (Ref. 16) acknowledges that undergrounding of a line would reduce the level of EMFs experienced but adds that “*high magnetic field levels may still occur immediately above the cable*”.

6.15.48 Local Policy EC5 of the East Riding Local Plan (Ref. 24) and the East Yorkshire Local Plan Update (Ref. 33) also seeks to ensure that proposals for the development of the energy sector are acceptable in terms of the need for additional cabling to connect to the National Grid and electromagnetic production and interference.

Assessment conclusions and appraisal

6.15.49 Chapter 16: Other Environmental Topics, ES Volume 1

[EN010143/APP/6.1] concludes that no significant effects to residential receptors are predicted to occur. Cables would be installed at a minimum of 10 m from the façade of any residential dwelling and this is secured by the **Outline Design Principles Statement [EN010143/APP/7.4]**. The Order limits are also not within the safeguarding zone of any safeguarded civil aerodrome as listed on Annex 3 of the planning circular 01/0327.

6.15.50 The assessment confirms that there are no residential properties within the Order limits. The nearest properties are at least 5 m from the Order limits and it is unlikely cables will be installed that close to any property due to the need for construction vehicles to manoeuvre both sides of the trench within the working width.

6.15.51 The assessment identifies that while some PRoW cross over the proposed Interconnecting Cable Corridor and Grid Connection Cable Corridors and therefore may also pass over the Interconnecting and Grid Connection Cables, it is concluded that the presence of the public either directly above or adjacent to underground cables associated with the Scheme would be transient, with the individuals using the PRoW exposed to electro-magnetic fields from the cables for only very short periods of time. It is also considered that the level of exposure to users of PRoW would be similar to that associated with general household appliances.

6.15.52 No significant effects to residential receptors and users of PRoW are predicted to occur in relation to electric and EMF. It is therefore considered that the Scheme is in accordance with NPS EN-5, draft NPS EN-5 and

relevant local planning policies regarding potential impacts of electric and EMF.

6.16 Cumulative Impacts

Planning Policy Context

6.16.1 Paragraph 4.1.3 of NPS EN-1 (Ref. 3) states that:

“In considering any proposed development, and in particular when weighing its adverse impacts against its benefits, the IPC should take into account:

- *its potential benefits including its contribution to meeting the need for energy infrastructure, job creation and any long-term or wider benefits; and*
- *its potential adverse impacts, including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce or compensate for any adverse impacts.”*

6.16.2 Paragraph 4.2.1 of NPS EN-1 (Ref. 3) further adds that the ES is required to provide an assessment of the likely significant effects of a project, including cumulative adverse impacts at all stages of the project.

6.16.3 Paragraph 4.2.5 of NPS EN-1 (Ref. 3) states that when considering cumulative effects: *“the ES should provide information on how the effects of the applicant’s proposal would combine and interact with the effects of other development (including projects for which consent has been sought or granted, as well as those already in existence)”*. Paragraph 4.2.6 (Ref. 3) adds that: *“The IPC 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.”*

6.16.4 Draft NPS EN-1 (Ref. 2), NPS EN-3 (Ref. 15) and Draft NPS EN-3 (Ref. 4) mirror this policy position, setting out that the Secretary of State should take into account cumulative adverse impacts of the Scheme, which should be assessed in the ES. This is specifically expected for health impacts (NPS EN-1 4.13.2 and Draft NPS EN1 paragraph 4.3.2); socio economic impacts (NPS EN-1 5.12.3 and Draft NPS EN-1 5.13.3); and transport impacts (Draft NPS EN-1 paragraph 5.14.8).

6.16.5 Local Policies EC5 of the 2012-2029 Strategy Document (Ref. 24) and East Riding Local Plan Update 2020-2039 (Ref. 33), and Policy SG10, Policy IC6, Policy NE1, and Policy NE7 of the Selby District Council Local Plan Publication Version (Ref. 34) all require the cumulative impact of proposals to be assessed and to be acceptable.

Assessment Conclusions

6.16.6 **Chapter 17: Cumulative Effects and Interactions, ES Volume 1 [EN010143/APP/6.1]** reports a summary of the assessment of two types of effects. It looks at effect interactions, which is the combined effect of individual impacts from the Scheme; and cumulative effects, where there is the potential for two or more developments that are reasonably foreseeable within close proximity to the Scheme, to lead to significant cumulative effects to the same receptor.

- 6.16.7 In terms of effect interactions, **Chapter 17: Cumulative Effects and Interactions, ES Volume 1 [EN010143/APP/6.1]** reports that there would be no significant effect interactions to road users, residential properties, business premises, community facilities and development land affected by landscape and visual effects coupled with traffic, and noise impacts as a result of the Scheme. It also concludes that there would be no significant effect interactions on heritage receptors experiencing impacts from views and noise. No significant effect interactions are also reported for local communities affected by changes in landscape and visual amenity, coupled with socio economic effects. It states that although users of the Permissive Paths may be more subjected to the landscape and visual effects of the Scheme, they will also benefit from access that was previously not available and which has beneficial transport and health implications.
- 6.16.8 In terms of cumulative effects, as set out in Section 3.6 of this Planning Statement, and **Chapter 17: Cumulative Effects and Interactions, ES Volume 1 [EN010143/APP/6.1]**, a shortlist of cumulative developments have been identified. This includes developments which overlap the Order limits as discussed in Section 3.6 of this Planning Statement.
- 6.16.9 An assessment of the cumulative effects of the Scheme along with other developments is presented in subsection 10 of **Chapters 6 to 15, ES Volume 1 [EN010143/APP/6.1]** and throughout **Chapter 16 Other Issues, ES Volume 1 [EN010143/APP/6.1]**. Within most technical chapters no likely significant effects have been identified through the cumulative effects assessment where they were not already predicted for the Scheme in isolation. **Chapter 10 Landscape and visual; Chapter 11 Noise and Vibration and Chapter 12 Transport and Access, ES Volume 1 [EN010143/APP/6.1]** present significant cumulative effects however these significant effects associated with the Scheme are not made greater (e.g., Moderate to Major) when considering these other developments alongside the Scheme. It is therefore considered that there will not be any new likely significant effects associated with cumulative effects that are not already accounted for by the assessment of the Scheme.
- 6.16.10 An exception to this is the functional improvement of soil resources that would follow conversion of arable to grassland when considered with the other solar farm proposals in North Yorkshire. Whilst a conservative approach has been presented in **Chapter 15: Soils and Agricultural Land, ES Volume 1 [EN010143/APP/6.1]** for the improved functionality of soils following arable to grassland conversion, which was assigned a Slight beneficial effect, this benefit has been emphasised within other projects and allocated a significant beneficial effect. Consequently, the cumulative effect on improved functionality of soils is moderate beneficial and significant. Similarly, there is a cumulative major significant beneficial effect associated with biodiversity net gain across the solar farm developments in the County due to the significant beneficial gains being delivered by each solar project in isolation.

Appraisal

- 6.16.11 In accordance with national and local planning policy, an assessment of the cumulative impacts of the Scheme has been undertaken. No new likely significant adverse effects are anticipated to arise from the Scheme when considered alongside those effects generated by nearby developments.

Significant cumulative adverse effects are identified that are accounted for by the assessment of the Scheme in terms of landscape and visual, noise and vibration and transport and access effects and these effects are no greater than those already predicted for the Scheme when considering the other identified developments alongside the Scheme. No significant adverse effects are likely from the interaction of effects.

- 6.16.12 The Scheme is anticipated to have a significant beneficial effect upon the functional improvement of soil resources that would follow the conversion of arable land to grassland when considered with the other solar farm proposals in North Yorkshire.

7. Conclusion and Planning Balance

- 7.1.1 The Scheme is anticipated to be determined pursuant to Section 105 of the PA 2008 (Ref. 1). Applications determined under this section require the Secretary of State to have regard to:
- a. Local Impact Reports
 - b. Prescribed matters
 - c. Any other matters which the Secretary of State considers to be both important and relevant.
- 7.1.2 This Planning Statement provides evidence of the Scheme's compliance with the relevant prescribed matters and relevant planning policy and other matters the Applicant considers are likely to be important and relevant, to inform the Secretary of State's decision as to whether to grant a DCO for the Scheme.
- 7.1.3 Local Impact Reports are expected to be prepared by the host authorities (East Riding of Yorkshire Council and North Yorkshire Council) for the examination of the DCO. The Scheme is in accordance with local policy to the extent that it is relevant, as demonstrated in **Appendix B** of this Planning Statement.
- 7.1.4 In terms of prescribed matters, it has been demonstrated that a decision to grant a DCO for the Scheme would have regard to the matters prescribed by Regulation 3 and 7 of the Infrastructure Planning (Decisions) Regulations 2010 (as amended) (Ref. 13). The Scheme has regard to preserving heritage assets and their setting as set out in section 6.9 of this Planning Statement. Biodiversity conservation and enhancement is also addressed in Section 6.8 of this Planning Statement and **Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1]**.
- 7.1.5 In terms of other matters that are considered to be important and relevant, these include the designated and draft National Policy Statements for Energy. The Energy NPSs, draft Energy NPSs and other national energy policy set out the Government's aims to provide secure and affordable energy supplies whilst decarbonising the energy system. It is considered that significant weight should be given to the provisions within the draft Energy NPS as these reflect the recent national energy policy and the Government's strategy to achieve net zero and the decarbonisation of the energy sector.
- 7.1.6 As identified in national policy and the Government's energy strategy there is an urgent need to bring forward large scale solar development in order to meet targets for decarbonisation and net zero. The Scheme will deliver these policy aims, providing a significant amount of low carbon electricity over its 40 year lifetime; and providing resilience, security and affordability of electricity supplies due to its large scale. It will therefore be a critical part of the national portfolio of renewable energy generation that is required to decarbonise its energy supply quickly.
- 7.1.7 It is clear that there is a compelling case and established need for the Scheme and that it will deliver national economic and social benefits in line with the Government's clear objectives of delivering sustainable development.

- 7.1.8 The Scheme will also deliver other more localised local economic, social and environmental benefits. These include substantial biodiversity net gain and enhancement measures, improvements to soil quality; improvements to the existing PRoW network through the provision of permissive paths; and significant employment generation during construction.
- 7.1.9 The analysis of planning policy compliance demonstrates that the need for the Scheme is supported by planning policy and other national energy and environmental policy and that the Scheme addresses relevant national and local planning policies through its design, avoiding sensitive areas and limiting adverse impacts where possible.
- 7.1.10 With the mitigation proposed, the ES concludes that the Scheme will not have any residual significant adverse effects in relation to designated landscapes, biodiversity sites or protected species or habitats; agricultural land, heritage assets, flood risk, water quality; access; and land uses. It is acknowledged that Scheme will result in residual significant adverse effects upon landscape and visual receptors. Residual significant adverse effects are also identified in relation to traffic increases on a single local road and in relation to noise and vibration in the unlikely event HDD activities need to continue at night. Whilst these effects are considered significant they would occur during the construction period and are therefore temporary and short term.
- 7.1.11 With regard to landscape and visual amenity, the Applicant has carefully designed the Scheme to ensure landscape and visual impacts are minimised through a comprehensive landscape and ecological design and increased connectivity and local access through the landscape. Effects are therefore minimised as far as practicable.
- 7.1.12 In terms of the overall planning balance, the clear and substantial benefits of the Scheme clearly outweigh any adverse effects, which would be localised, short-term temporary and/or reversible at the end of the Scheme's lifetime.
- 7.1.13 This Planning Statement has demonstrated that the Scheme is in accordance with relevant national and local policy considered to be important and relevant and that substantial weight should be given to need when considering applications for consent under the PA 2008 (Ref. 1). 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.

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Abbreviations

Abbreviation/Term	Definition
PA	Planning Act
MW	Megawatts
DAS	Design and Access Statement
NPS	National Policy Statement
DCO	Development Consent Order
SOS	Secretary of State
PV	Photovoltaic
CEMP	Construction Environmental Management Plan
DEMP	Decommissioning Environmental Management Plan
NIC	National Infrastructure Commission
NPPF	National Planning Policy Framework
LCT	Landscape Character Type
LCA	Landscape Character Area
ALC	Agricultural Land Classification
SAC	Special Areas of Conservation
DEFRA	Department for Environment, Food and Rural Affairs
SPA	Special Protection Areas
SSSI	Site of Special Scientific Interest
NNR	National Nature Reserve
LNR	Local Nature Reserve
LWS	Local Wildlife Sites
SINC	Site of Nature Conservation Interest
SuD	Sustainable Urban Drainage Systems
PRoW	Public Right of Way
BMV	Best and Most Versatile Land
Ha	Hectares
EIA	Environmental Impact Assessment

Glossary of Frequently Used Terms

Term	Definition
Order Limits	The limits shown on the land plans and works plans within which the authorised development may be carried out and land acquired or used
Applicant	East Yorkshire Solar Farm Limited
The Planning Inspectorate	The Planning Inspectorate deals with planning appeals, national infrastructure planning applications, examinations of local plans and other planning-related and specialist casework in England.
Planning Act 2008	An Act to establish the Infrastructure Planning Commission and make provision about its functions; to make provision about, and about matters ancillary to, the authorisation of projects for the development of nationally significant infrastructure; to make provision about town and country planning; to make provision about the imposition of a Community Infrastructure Levy; and for connected purposes.
Secretary of State	His Majesty's principal secretaries of state, or secretaries of state, are senior ministers of the Crown in the Government of the United Kingdom. In this case, reference is made to the Secretary of State for Energy Security and Net Zero.
Planning Statement	This document.
Biodiversity Net Gain (BNG)	BNG is a strategy to develop land and contribute to the recovery of nature. It is a way of making sure the habitat for wildlife is in a better state than it was before development.
Detailed Construction Environmental Management Plan (CEMP)	Subsequently produced following the appointment of the contractor, when the detailed design of the Scheme is known, in accordance with a requirement of the DCO prior to commencing construction. It will be a live document and will provide a systematic approach to environmental management so that environmental risks are identified, incorporated in all decision-making and managed appropriately.
Development Consent Order (DCO)	Development consent is required pursuant to the Planning Act 2008 for Nationally Significant Infrastructure Projects. A development consent order is the order which grants development consent when an application is made to the Secretary of State.
Ecology Mitigation Area	Area of land in the north-east of the Site to be managed to provide good quality habitat for overwintering and migratory bird species, mitigating the loss of habitat elsewhere in the Site considered to be functionally linked

to the international designated sites of the Lower Derwent Valley Special Protection Area (SPA)/Ramsar and Humber Estuary SPA/Ramsar.

East-West Single Axis Tracker	The system of attaching the Solar PV Panels to a motorised table that moves in relation to the sun tilting the panel from east to west over the course of the day. This allows for optimal power generation throughout the day.
Environmental Impact Assessment (EIA)	A process by which information about environmental effects of a proposed development is collected, assessed and used to inform decision making. For certain projects, EIA is a statutory requirement.
Field Station Units	Single enclosures that comprise the inverters, a transformer, and switchgear in a single containerised unit.
Field Stations	Areas where electrical equipment such as central inverters, transformers, and switchgear are located.
Field Substations	Transformers and switchgear packaged together in containerised units. In this case inverters are separate, either string or central type.
Framework Construction Environmental Management Plan (CEMP)	This document. Provides a framework from which a final CEMP will be developed to avoid, minimise or mitigate any construction effects on the environment.
Framework Decommissioning Environmental Management Plan (DEMP)	A specific plan developed to ensure that appropriate environmental management practices are followed during the decommissioning phase of a project.
Framework Operational Environmental Management Plan (OEMP)	A specific plan developed to ensure that appropriate environmental management practices are followed during the operational phase of a project.
Grid Connection Corridor	Corridor which represents the maximum extent of land within which the cable route would be located.
Grid Connection Substation	A compound containing electrical equipment to enable connection to the National Grid.
Grid Connection Working Width	Width of the construction area for the Grid Connection Cable which includes haul road, spoil storage, cable trench and temporary drainage during cable installation.
Interconnecting Cable Corridor	The land outside of the Solar PV Site and the Grid Connection Corridor in which the 33 kV cables linking the Solar PV Areas to the Grid Connection Substations will be installed.

Interconnecting Cables	33 kV cables which link the Solar PV Areas to the Grid Connection Substations. (This excludes the 132 kV Grid Connection Cable).
Inverter	Inverters convert the direct current (DC) electricity collected by the PV modules into alternating current (AC), which allows the electricity generated to be exported to the National Grid. Battery energy storage systems also use inverters to convert between DC and AC. The batteries function in DC and electricity must be converted to AC to pass into or from the grid.
Mitigation	Measures including any process, activity, or design to avoid, prevent, reduce, or, if practicable, offset any identified significant adverse effects on the environment.
National Grid Drax Substation	The substation at Drax Power Station west of Drax village, North Yorkshire, owned and operated by National Grid and where the Grid Connection Cable will connect to.
Nationally Significant Infrastructure Projects (NSIP)	NSIPs are large scale developments such as certain new harbours, power generating stations (including wind farms), highways developments and electricity transmission lines, which require a type of consent known as 'development consent' under procedures governed by the Planning Act 2008 (and amended by the Localism Act 2011).
Scheme	The project for which the DCO Applicant is sought.
Site	The Site is the collective term for the Solar PV Site, the Ecology Mitigation Area, the Interconnecting Cables and the Grid Connection Corridor.
Solar photovoltaics (PV)	Solar electricity panels, also known as PV, capture the sun's energy and convert it into electricity for consumer use.
Solar PV Areas	Areas of land within which the solar PV panels, Field Stations and Grid Connection Substations are to be located. For clarity of reporting, individual Solar PV Areas have been assigned an identification number e.g. 1a, 1b, etc.
Solar PV Site	The Solar PV Site comprises the 18 Solar PV Areas. This is the anticipated maximum extent of land potentially required for the solar photovoltaic (PV) panels, associated infrastructure and on-site energy storage facilities; including land for landscaping and habitat enhancement
Solar PV Panels	Convert sunlight into electrical current (as direct current, DC). Typically consist of a series of photovoltaic cells beneath a layer of toughened, low reflectivity glass.

Switchgear

Switchgear is an integral part of an electric power system. It includes fuses, switches, relays, isolators, circuit breaker, potential and current transformer, indicating device, lightning arresters, etc. that protects electrical hardware from faulty conditions.

Transformers

Transformers control the voltage of the electricity generated across the site before it reaches the electrical infrastructure.

Appendix A NPS Accordance Tables

Appendix A National Policy Statement Accordance Tables

1.1 Table 1 Overarching National Policy Statement for Energy (EN-1)

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
Paragraph 1.7.2	<p>Some key points from the Appraisal of Sustainability for EN-1 are set out below.</p> <p>The energy NPSs should speed up the transition to a low carbon economy and thus help to realise UK climate change commitments sooner than continuation under the current planning system. However, there is also some uncertainty as it is difficult to predict the mix of technology that will be delivered by the market against the framework set by the Government.</p> <p>The energy NPSs are likely to contribute positively towards improving the vitality and competitiveness of the UK energy market by providing greater clarity for developers which should improve the UK’s security of supply and, less directly, have positive effects for health and well-being in the medium to longer term through helping to secure affordable supplies of energy and minimising fuel poverty; positive medium and long term effects are also likely for equalities.</p> <p>The development of new energy infrastructure, at the scale and speed required to meet the current and future need, is likely to have some negative effects on biodiversity, landscape/visual amenity and cultural heritage. However the significance of these effects and the effectiveness of mitigation possibilities is uncertain at the strategic and non-</p>	<p>As set out in the Statement of Need [EN010143/APP/7.1] the Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure and low-carbon electricity both during and beyond the critical 2020s timeframe. Maximising the capacity of generation in the resource-rich, well-connected and technically deliverable proposed location for the Scheme, represents a significant and economically rational step forwards in the fight against the global climate emergency.</p> <p>The Scheme would contribute to an adequate and dependable UK energy generation mix, through enabling the generation of more low-carbon power from indigenous and renewable resources.</p> <p>In addition, if approved, the Scheme would have a beneficial indirect impact on health and well-being by helping to secure affordable supplies of energy and minimising fuel poverty. Chapter 14 Human Health, ES Volume 1 [EN010143/APP/6.1] states that the Scheme would also provide immediate health benefits through the provision of permissive paths, giving the local population access to open space, as well as providing access to employment</p>

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
	<p>locationally specific level at which EN-1 to EN-5 are pitched. Short-term construction impacts are also likely through an increased use of raw materials and resources and negative effects on the economy due to impacts on existing land and sea uses. In general, it should be possible to mitigate satisfactorily the most significant potential negative effects of new energy infrastructure consented in accordance with the energy NPSs, and they explain ways in which this can be done; however, the impacts on landscape/visual amenity in particular will sometimes be hard to mitigate.</p>	<p>which is evidenced to provide a better quality of life.</p> <p>The environmental impacts of the Scheme have been assessed as reported in the ES [EN010143/APP/6.1-6.4] and are discussed in this Planning Statement [EN010143/APP/7.2]. Overall, with appropriate mitigation implemented, the Scheme is expected to have limited and localised residual significant adverse effects during its 40 year operation when considered relative to the large scale nature of the Scheme. These effects are therefore considered to be outweighed by the significant national benefits that the Scheme will provide. There are no specific and relevant policies set out in the relevant NPSs which clearly indicate that consent should be refused.</p>
<p>Paragraph 1.7.11</p>	<p>As noted above, the principal area in which consenting new energy infrastructure in accordance with the energy NPSs is likely to lead to adverse effects which cannot always be satisfactorily mitigated is in respect of landscape and visual effects. EN-1 already contains policies which severely limit the prospects for development of large-scale energy infrastructure in the most attractive landscapes and townscapes. Tightening the development consent policies in EN-1 to make it harder for energy infrastructure to be consented which would have adverse landscape or townscape effects would be likely to make it significantly</p>	<p>This policy notes that landscape and visual effects cannot always be satisfactorily mitigation in respect of new energy infrastructure.</p> <p>The Scheme would not have any significant effects on international or national designated sites relating to landscape.</p> <p>Chapter 10: Landscape and Visual Amenity, ES Volume 1 [EN010143/APP/6.1] sets out the effects of the Scheme on other landscape and visual impacts.</p>

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
	<p>more difficult to gain consent for a range of large-scale energy infrastructure projects...</p>	<p>It is considered that the limited and reversible landscape and visual effects of the Scheme are clearly and comprehensively outweighed by the benefits of the Scheme in terms of delivering renewable energy infrastructure which is urgently needed in order to create a secure and affordable energy system and to help combat climate change. Therefore, the level of landscape impacts are not considered to be so damaging that they are not offset by the benefits of the Scheme.</p>
<p>The Road to 2050</p>		
<p>Paragraph 2.2.2</p>	<p>The Government is working to ensure their efforts produce the major, rapid change the UK needs. Within a market-based system and with severe constraints on public expenditure in the near-term, the focus of Government activity in this transformation is clear. It should be on developing a clear, long-term policy framework which facilitates investment in the necessary new infrastructure (by the private sector) and in energy efficiency</p>	<p>The Statement of Need [EN010143/APP/7.1] and Section 5 of the Planning Statement [EN010143/APP/7.2] explain that the Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure and low-carbon electricity both during and beyond the critical 2020s timeframe. Maximising the capacity of generation in the resource-rich, well-connected and technically deliverable</p>
<p>Paragraph 2.2.6</p>	<p>The UK needs to wean itself off such a high carbon energy mix: to reduce greenhouse gas emissions, and to improve the security, availability and affordability of energy through diversification. Under some of the illustrative 2050 pathways, electricity generation would need to be virtually emission-free, given that we would expect some emissions from industrial and agricultural processes, transport and waste to persist. By 2050, we can expect that fossil fuels will be scarcer, but will still be in demand, and that prices</p>	<p>proposed location for the Scheme, represents a significant and economically rational step forwards in the fight against the global climate emergency.</p> <p>Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1] presents a lifecycle greenhouse gas (GHG) impact assessment over the lifetime of the Scheme. It concludes that renewable energy generation from the Scheme</p>

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
	<p>will therefore be far higher. Further, the UK’s own oil and gas resources will be depleting and, worldwide, the costs and risks of extracting oil in particular will increase</p>	<p>during the first full year of operation (2027) is estimated to be 433,709 MWh based on a 480MW capacity of the Scheme. The operational emissions over the design life of the Scheme are estimated at</p>
<p>Paragraph 2.2.9</p>	<p>To prepare for the impacts of climate change, the Climate Change Act 2008 also sets out a statutory framework for adapting to climate change, with the Government committed to producing a statutory climate change adaptation programme in 2012 (which will be updated on five-yearly cycles). To lead and co-ordinate work in preparation for this, the Government has established the Adapting to Climate Change Programme, which includes:</p> <ol style="list-style-type: none"> 1) undertaking a UK Climate Change Risk Assessment; and 2) using the "Adaptation Reporting Power" to require certain public bodies and statutory undertakers to set 	<p>65,337 tCO₂e. The GHG impact of construction and decommissioning are anticipated to result in minor adverse and non-significant effects on the climate. This demonstrates the Scheme’s very low carbon attributes compared to other non-renewable forms of electricity generation, providing an overall major beneficial impact in relation to the UK meeting its carbon reduction targets.</p> <p>A UK Climate Change Risk Assessment is undertaken in the Assessment of Effects (Section 6.7) of Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1].</p>
<p>Paragraph 2.2.20</p>	<p>It is critical that the UK continues to have secure and reliable supplies of electricity as we make the transition to a low carbon economy. To manage the risks to achieving security of supply we need:</p> <p>sufficient electricity capacity (including a greater proportion of low carbon generation) to meet demand at all times. Electricity cannot be stored so demand for it must be simultaneously and continuously met by its supply. This requires a safety margin of spare capacity to accommodate unforeseen fluctuations in supply or demand;</p> <p>reliable associated supply chains (for example fuel for power stations) to meet demand as it arises; a diverse mix</p>	<p>The Statement of Need [EN010143/APP/7.1] and Section 5 of the Planning Statement [EN010143/APP/7.2] concludes 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.</p>

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
	<p>of technologies and fuels, so that we do not rely on any one technology or fuel. Diversity can be achieved through the use of different technologies and multiple supply routes (for example, primary fuels imported from a wide range of countries); and</p> <p>there should be effective price signals, so that market participants have sufficient incentives to react in a timely way to minimise imbalances between supply and demand.</p>	
Paragraph 2.2.22	<p>Looking further ahead, the 2050 pathways show that the need to electrify large parts of the industrial and domestic heat and transport sectors could double demand for electricity over the next forty years. It makes sense to switch to electricity where practical, as electricity can be used for a wide range of activities (often with better efficiency than other fuels) and can, to a large extent, be scaled up to meet demand. To meet emissions targets, the electricity being consumed will need to be almost exclusively from low carbon sources. Contrast this with the first quarter of 2011, when around 75% of our electricity was supplied by burning gas and coal.</p>	
The need for new nationally significant energy infrastructure development		
IPC Decision Making		
Paragraph 3.1.1	<p>The UK needs all the types of energy infrastructure covered by this NPS in order to achieve energy security at the same time as dramatically reducing greenhouse gas emissions.</p>	<p>Whilst EN-1 does not explicitly consider solar development, solar projects can make a significant contribution to meeting the urgent need for large-</p>

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
Paragraph 3.1.2	It is for industry to propose new energy infrastructure projects within the strategic framework set by Government. The Government does not consider it appropriate for planning policy to set targets for or limits on different technologies.	scale, low carbon NSIPs. In the Applicant’s view, substantial weight is to be placed on the need for the development as demonstrated in the Statement of Need [EN010143/APP/7.1] and Section 5 of the Planning Statement [EN010143/APP/7.2] and because solar
Paragraph 3.1.3	The IPC should therefore assess all applications for development consent for the types of infrastructure covered by the energy NPSs on the basis that the Government has demonstrated that there is a need for those types of infrastructure and that the scale and urgency of that need is as described for each of them in this Part.	developments can contribute significantly to requirements of climate policy both in 2011 and more recently. Without the Scheme, a significant and vital opportunity to develop a large-scale low-carbon generation scheme will have been passed over, increasing materially the risk that future Carbon Budgets and Net Zero 2050 will not be achieved.
Paragraph 3.1.4	The IPC should give substantial weight to the contribution which projects would make towards satisfying this need when considering applications for development consent under the Planning Act 2008.	The Scheme will make a sizeable contribution to meeting the Government’s decarbonisation commitments, in direct accordance with this policy.
Introduction		
Paragraph 3.2.2	As we move towards 2050 the ways in which we use energy will be transformed. We need to become less dependent on some forms of energy, as new and innovative low carbon technologies and energy efficiency measures are taken up. We also shall become more dependent on others – for example, demand for electricity will increase if we electrify large parts of transport, heating and industry	Whilst EN-1 does not explicitly consider solar development, solar projects can make a significant contribution to meeting the urgent need for large-scale, low carbon NSIPs. In the Applicant’s view, substantial weight is to be placed on the need for the development as demonstrated in the Statement of Need [EN010143/APP/7.1] and because solar developments can contribute
Paragraph 3.2.3	This Part of the NPS explains why the Government considers that, without significant amounts of new large-	significantly to requirements of climate policy both in 2011 and more recently. Without the Scheme, a

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
	<p>scale energy infrastructure, the objectives of its energy and climate change policy cannot be fulfilled. However, as noted in Section 1.7, it will not be possible to develop the necessary amounts of such infrastructure without some significant residual adverse impacts. This Part also shows why the Government considers that the need for such infrastructure will often be urgent. The IPC should therefore give substantial weight to considerations of need. The weight which is attributed to considerations of need in any given case should be proportionate to the anticipated extent of a project’s actual contribution to satisfying the need for a particular type of infrastructure.</p>	<p>significant and vital opportunity to develop a large-scale low-carbon generation scheme will have been passed over, increasing materially the risk that future Carbon Budgets and Net Zero 2050 will not be achieved.</p> <p>The Scheme will make a sizeable contribution to meeting the Government’s decarbonisation commitments, in direct accordance with this policy.</p>
<p>The Need for New Nationally Significant Electricity Infrastructure Projects</p>		
<p>Paragraph 3.3.1</p>	<p>Electricity meets a significant proportion of our overall energy needs and our reliance on it is likely to increase as we move towards our 2050 goals. The key reasons why the Government believes there is an urgent need for new electricity NSIPs are set out below</p>	<p>The Statement of Need [EN010143/APP/7.1] and Section 5 of the Planning Statement [EN010143/APP/7.2] explain that the Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure and low-carbon electricity both during and beyond the critical 2020s timeframe. Maximising the capacity of generation in the resource-rich, well-connected and technically deliverable proposed location for the Scheme, represents a significant and economically rational step forwards in the fight against the global climate emergency.</p>
<p>Paragraph 3.3.2</p>	<p>The Government needs to ensure sufficient electricity generating capacity is available to meet maximum peak demand, with a safety margin or spare capacity to accommodate unexpectedly high demand and to mitigate risks such as unexpected plant closures and extreme weather events. This is why there is currently around 85 GW of total generation capacity in the UK, whilst the average demand across a year is only for around half of this</p>	<p>Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1] presents a lifecycle greenhouse gas (GHG) impact assessment over</p>

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the lifetime of the Scheme. It concludes that Renewable energy generation from the Scheme during the first full year of operation (2027) is estimated to be 433,709 MWh based on a 480MW capacity of the Scheme. The operational emissions over the design life of the Scheme are estimated at 65,337 tCO₂e. The GHG impact of construction and decommissioning are anticipated to result in minor adverse and non-significant effects on the climate. This demonstrates the Scheme's very low carbon attributes compared to other non-renewable forms of electricity generation, providing an overall major beneficial impact in relation to the UK meeting its carbon reduction targets.

Paragraph 3.3.3

The larger the difference between available capacity and demand (i.e. the larger the safety margin), the more resilient the system will be in dealing with unexpected events, and consequently the lower the risk of a supply interruption. This helps to protect businesses and consumers, including vulnerable households, from rising and volatile prices and, eventually, from physical interruptions to supplies that might impact on essential services.

The **Statement of Need [EN010143/APP/7.1]** and Section 5 of the **Planning Statement [EN010143/APP/7.2]** explain that the Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure and low-carbon electricity both during and beyond the critical 2020s timeframe. Maximising the capacity of generation in the resource-rich, well-connected and technically deliverable proposed location for the Scheme, represents a significant and economically rational step forwards in the fight against the global climate emergency.

The **Statement of Need [EN010143/APP/7.1]** states that low marginal cost and low marginal

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carbon emissions energy generated at the Scheme, can be confidently forecast and priced into future contracts for power delivery by all market participants, thus allowing all consumers to benefit from the market price, reducing the effect of solar generation.

The **Statement of Need [EN010143/APP/7.1]** concludes 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.

Paragraph 3.3.4

There are benefits of having a diverse mix of all types of power generation. It means we are not dependent on any one type of generation or one source of fuel or power and so helps to ensure security of supply. In addition, as set out briefly below, the different types of electricity generation have different characteristics which can complement each other:

fossil fuel generation can be brought on line quickly when there is high demand and shut down when demand is low, thus complementing generation from nuclear and the intermittent generation from renewables. However, until such time as fossil fuel generation can effectively operate with Carbon Capture and Storage (CCS), such power stations will not be low carbon (see Section 3.6).

The **Statement of Need [EN010143/APP/7.1]** and Section 5 of the **Planning Statement [EN010143/APP/7.2]** explain that the Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure and low-carbon electricity both during and beyond the critical 2020s timeframe. Maximising the capacity of generation in the resource-rich, well-connected and technically deliverable proposed location for the Scheme, represents a significant and economically rational step forwards in the fight against the global climate emergency.

Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1] presents a lifecycle

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	<p>renewables offer a low carbon and proven (for example, onshore and offshore wind) fuel source, but many renewable technologies provide intermittent generation (see Section 3.4); and</p> <p>nuclear power is a proven technology that is able to provide continuous low carbon generation, which will help to reduce the UK's dependence on imports of fossil fuels (see Section 3.5). Whilst capable of responding to peaks and troughs in demand or supply, it is not as cost efficient to use nuclear power stations in this way when compared to fossil fuel generation.</p>	<p>greenhouse gas (GHG) impact assessment over the lifetime of the Scheme. It concludes that Renewable energy generation from the Scheme during the first full year of operation (2027) is estimated to be 433,709 MWh based on a 480MW capacity of the Scheme. The operational emissions over the design life of the Scheme are estimated at 65,337 tCO₂e. The GHG impact of construction and decommissioning are anticipated to result in minor adverse and non-significant effects on the climate. This demonstrates the Scheme's very low carbon attributes compared to other non-</p>
Paragraph 3.3.5	<p>The UK is choosing to largely decarbonise its power sector by adopting low carbon sources quickly. There are likely to be advantages to the UK of maintaining a diverse range of energy sources so that we are not overly reliant on any one technology (avoiding dependency on a particular fuel or technology type). This is why Government would like industry to bring forward many new low carbon developments (renewables, nuclear and fossil fuel generation with CCS) within the next 10 to 15 years to meet the twin challenge of energy security and climate change as we move towards 2050</p>	<p>renewable forms of electricity generation, providing an overall major beneficial impact in relation to the UK meeting its carbon reduction targets.</p> <p>The Statement of Need [EN010143/APP/7.1] and Section 5 of the Planning Statement [EN010143/APP/7.2] states that the Scheme, if approved, would contribute to an adequate and dependable UK energy generation mix, through enabling the generation of more low-carbon power from indigenous and renewable resources.</p>
Paragraph 3.3.6	<p>Within the strategic framework established by the Government it is for industry to propose the specific types of developments that they assess to be viable. This is the nature of a market-based energy system. The IPC should therefore act in accordance with the policy set out at in</p>	<p>The Statement of Need [EN010143/APP/7.1] and Section 5 of the Planning Statement [EN010143/APP/7.2] sets out that due to technological advances, solar facilities are already among the cheapest form of electricity generation in the UK and Government forecasts indicate that</p>

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Paragraph 3.3.14	Section 3.1 when assessing proposals for new energy NSIPs	costs will continue to reduce in the future. Solar power is economically attractive in the UK against many other forms of conventional and renewable generation.
Paragraph 3.3.14	Government analysis of the different pathways to 2050 shows that it will be vital to make energy efficiency improvements per head of population if we are to meet the target of reducing emissions by at least 80% by 2050 (see paragraph 3.3.26 below). However, even with major improvements in overall energy efficiency, we expect that demand for electricity is likely to increase, as significant sectors of energy demand (such as industry, heating and transport) switch from being powered by fossil fuels to using electricity. As a result of this electrification of demand, total electricity consumption (measured in terawatt hours over a year) could double by 2050. Depending on the choice of how electricity is supplied, the total capacity of electricity generation (measured in GW) may need to more than double to be robust to all weather conditions. In some outer most circumstances, for example if there was very strong electrification of energy demand and a high level of dependence on intermittent electricity generation, then the capacity of electricity generation could need to triple. The Government therefore anticipates a substantial amount of new generation will be needed.	Scale remains important, and maximising the generating capacity of schemes improves their economic efficiency, and so brings electricity generation to the market at the lowest cost possible. Larger solar schemes, such as the Scheme, 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 economic benefits in line with government policy. The Statement of Need [EN010143/APP/7.1] and Section 5 of the Planning Statement [EN010143/APP/7.2] concludes 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.
Paragraph 3.3.15	In order to secure energy supplies that enable us to meet our obligations for 2050, there is an urgent need for new (and particularly low carbon) energy NSIPs to be brought forward as soon as possible, and certainly in the next 10 to	As explained in the Statement of Need [EN010143/APP/7.1] and Section 5 of the Planning Statement [EN010143/APP/7.2] , the

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	<p>15 years, given the crucial role of electricity as the UK decarbonises its energy sector.</p>	<p>Scheme will deliver significant amounts of low-carbon energy.</p> <p>Solar is relatively quick to construct compared to other technologies which have longer construction timeframes or have potentially not yet been proven at scale.</p> <p>The Scheme would directly respond to the urgent need to deliver a large amount of renewable generation capacity quickly. Subject to obtaining the necessary consents, construction is anticipated to commence in 2025 and be completed ready for operation in 2027.</p>

The Role of Renewable Energy Generation

<p>Paragraph 3.4.1</p>	<p>The UK has committed to sourcing 15% of its total energy (across the sectors of transport, electricity and heat) from renewable sources by 2020 and new projects need to continue to come forward urgently to ensure that we meet this target. Projections suggest that by 2020 about 30% or more of our electricity generation – both centralised and small-scale – could come from renewable sources, compared to 6.7% in 2009. The Committee on Climate Change in Phase 1 of its advice to Government in September 2010 agreed that the UK 2020 target was appropriate, and should not be increased. Phase 2 was published in May 2011 and provided recommendations on the post 2020 ambition for renewables in the UK, and</p>	<p>In 2011, when the NPS EN-1 was published, ground mounted solar developments tended to be smaller in scale and so it was not anticipated that solar projects would be developed on the NSIP (50MW+) scale. For this reason, solar projects were not listed in the designated NPS EN-1 as a large-scale renewable energy source. The solar market has changed dramatically since 2011 with the technology becoming cheaper and being deployed at scale. National policy now recognises the major contribution that solar can make to our energy mix. For example, this is recognised in:</p>
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Paragraph 3.4.2	<p>possible pathways to maximise their contribution to the 2050 carbon reduction targets.</p> <p>Large scale deployment of renewables will help the UK to tackle climate change, reducing the UK’s emissions of carbon dioxide by over 750 million tonnes by 2030. It will also deliver up to half a million jobs by 2020 in the renewables sector. Renewable electricity generation is currently supported in the UK through the Renewables Obligation (RO), which is a market-based support mechanism to encourage investment. Renewables have potential to improve security of supply by reducing reliance on the use of coal, oil and gas supplies to keep the lights on and power our businesses. Meeting the 15% renewables target could reduce fossil fuel demand by around 10% and gas imports by 20-30%. We are committed to meeting 2020 targets and have further ambitions for renewables post-2020. The Committee on Climate Change’s May 2011 report included advice on moving to 30% renewable energy capacity by 2030 and a central scenario of 40% renewable electricity.</p>	<ul style="list-style-type: none"> • Net Zero: Opportunities for the Power Sector (2020): Where in NIC recommends that the generation mix of up to around 90% renewables is required to meet the target and that across all scenarios significant solar, onshore wind and offshore wind would need to be installed. The report estimates that between 129-237 GW of renewable capacity would need to be in operation by 2050, including 56-121 GW of solar. • Energy White Paper: Powering our Net Zero Future (2020) which states that a ‘low-cost, net zero consistent system is likely to be composed predominantly of wind and solar ‘ • British Energy Security Strategy (2022) which states that “With the sun providing enough daily energy to power the world 10,000 times over, solar power is a globally abundant resource. There is currently 14GW of solar capacity in the UK split between large scale projects to smaller scale rooftop solar. The cost of solar has fallen by around 85% over the past decade and can be installed in just one day on a domestic roof. We expect a five-fold increase in deployment by 2035.’
Paragraph 3.4.3	<p>The UK has substantial renewable energy resources, for example the British Isles have 40% of Europe’s wind and some of the highest tidal reaches in the world. Unlike other technologies, the cost of renewables is in the construction and maintenance alone as the resource itself is usually free, so it helps protect consumers against the volatile but generally increasing cost of fossil fuels. Future large-scale</p>	<p>The weight applied to paragraph 3.4.3 is therefore considered to be minimal given that it does not reflect the current commercial realities of solar development or current Government policy.</p>

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renewable energy generation is likely to come from the following sources:

Onshore Wind – onshore wind is the most well-established and currently the most economically viable source of renewable electricity available for future large-scale deployment in the UK;

Offshore Wind – offshore wind is expected to provide the largest single contribution towards the 2020 renewable energy generation targets;

Biomass – biomass is a significant source of renewable and low carbon energy. It involves the combustion of fuel, such as wood, which is renewable because, through replanting and regrowth, the biomass can be replaced in a matter of decades and this cycle can be continuously repeated. Whilst energy is required to grow, harvest and transport it, biomass is considered to be low carbon, providing that the biomass has been cultivated, processed and transported with due consideration of sustainability. Its combustion also displaces emissions of carbon dioxide ordinarily released using fossil fuels;

Energy from Waste (EfW) – the principal purpose of the combustion of waste, or similar processes (for example pyrolysis or gasification) is to reduce the amount of waste going to landfill in accordance with the Waste Hierarchy and to recover energy from that waste as electricity or heat.

Only waste that cannot be re-used or recycled with less environmental impact and would otherwise go to landfill

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	<p>should be used for energy recovery. The energy produced from the biomass fraction of waste is renewable and is in some circumstances eligible for Renewables Obligation Certificates, although the arrangements vary from plant to plant; and</p> <p>Wave and Tidal – the UK has the potential for wave and tidal energy and there are now full scale prototypes working towards array scale and pre-commercial deployment. However many of the technologies for making use of the wave resource and tidal currents are still developing.</p> <p>Proven technology exists for tidal range generation but proposed projects are still some time from commencement. Paragraph 1.4.5 explains how this NPS relates to wave and tidal generation.</p>	
Paragraph 3.4.5	Paragraph 3.4.1 above sets out the UK commitments to sourcing 15% of energy from renewable sources by 2020. To hit this target, and to largely decarbonise the power sector by 2030, it is necessary to bring forward new renewable electricity generating projects as soon as possible. The need for new renewable electricity generation projects is therefore urgent.	<p>As explained in the Statement of Need [EN010143/APP/7.1] and Section 5 of the Planning Statement [EN010143/APP/7.2], the Scheme will deliver significant amounts of low-carbon energy.</p> <p>Solar is relatively quick to construct compared to other technologies which have longer construction timeframes or have potentially not yet been proven at scale.</p> <p>The Scheme would directly respond to the urgent need to deliver a large amount of renewable generation capacity quickly. Subject to obtaining</p>

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the necessary consents, construction is anticipated to commence in 2025 and be completed ready for operation in 2027.

Without the Scheme, a significant and vital opportunity to develop a large-scale low-carbon generation scheme will have been passed over, increasing materially the risk that future Carbon Budgets and Net Zero 2050 will not be achieved

Assessment Principles

General Points

Paragraph 4.1.2

Given the level and urgency of need for infrastructure of the types covered by the energy NPSs set out in Part 3 of this NPS, the IPC should start with a presumption in favour of granting consent to applications for energy NSIPs. That presumption applies unless any more specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused. The presumption is also subject to the provisions of the Planning Act 2008 referred to at paragraph 1.1.2 of this NPS.

The Applicant notes this policy and considers that the Scheme should be treated as if presumption in favour of granting consent applies, as more recent planning and energy policies set out that solar generation is expected to comprise an import part of an energy mix required to meet objectives and commitments for the energy system and climate change. For example, Draft NPS EN-1 states:

3.3.44: "Known technologies that are included within the scope of this NPS are: Offshore Wind (including floating wind), Solar PV, Wave, Tidal Range, Tidal Stream, Pumped Hydro, Energy from Waste (including ACTs) with or without CCS, Biomass with or without CCS, Natural Gas with or without CCS, low carbon hydrogen, large-scale nuclear, Small Modular Reactors, Advanced

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Modular Reactors, and fusion power plants. The need for all these types of infrastructure is established by this NPS and is urgent.

3.3.21: *“Our analysis shows that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar.”*

Paragraph 4.1.3

In considering any proposed development, and in particular when weighing its adverse impacts against its benefits, the IPC should take into account:

its potential benefits including its contribution to meeting the need for energy infrastructure, job creation and any long-term or wider benefits; and

its potential adverse impacts, including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce or compensate for any adverse impacts.

Section 6 of this **Planning Statement [EN010143/APP/7.2]** sets out that the Scheme has been informed by a detailed and sensitive iterative design process which has considered environmental constraints and opportunities in order to develop a good design that balances the need to maximise renewable energy generation from the Scheme, whilst minimising potential impacts and providing mitigation and enhancement measures where practicable. The design process and evolution of the proposed design are summarised in **Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010142/APP/6.1]**, and the **Design and Access Statement [EN010142/APP/7.3]**.

The ES [EN010143/APP/6.1] and its supporting Appendices [EN010143/APP/6.2] and Figures [EN010143/APP/6.3] provide an assessment of the Scheme and its potential adverse impacts, including long-term and cumulative adverse impacts, and measures to avoid, reduce or

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compensate for such impacts. They also set out where the Scheme would have a beneficial effect.

The **Statement of Need [EN010143/APP/7.1]** and Section 5 of the **Planning Statement [EN010143/APP/7.2]** explain that the Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure and low-carbon electricity both during and beyond the critical 2020s timeframe. Maximising the capacity of generation in the resource-rich, well-connected and technically deliverable proposed location for the Scheme, represents a significant and economically rational step forwards in the fight against the global climate emergency.

Section 5.3 of this **Planning Statement [EN010143/APP/7.2]** also sets out the benefits of the Scheme. Along with contributing to a sufficient, reliable and affordable energy system whilst helping the Government decarbonise, and meet national climate change targets and budgets, the Scheme provides a number of other benefits which are set out below.

Electricity Generation - Over the 40-year lifetime of the Scheme, it would generate enough electricity to power approximately 147,222 homes per annum based on Ofgem data. This is a significant increase in electricity generation with

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recognition that more electricity generation is needed to meet demand.

Decarbonisation - The Scheme indicates an overall lifetime carbon reduction, relative to the counterfactual Combined Cycle Gas Turbine (CCGT), of over 5.5 million tCO₂e. The overall greenhouse gas impact of the Scheme is therefore beneficial and significant, as it will play a part in achieving the rate of transition required by nationally set policy commitments and supporting the trajectory towards Net Zero.

Environmental Benefits – The Scheme would provide a number of ecological enhancements through its landscape design. The Scheme would also provide soil improvements as a result of the change from arable farming to grassland. These measures are set out in full in the **Framework LEMP [EN010143/APP/7.14]**. The Applicant is committed to exceeding the Government’s 10% target for biodiversity net gain as set out in the Environment Act 2021. A **Biodiversity Net Gain (BNG) report [EN010143/APP/6.2]** demonstrates that the Scheme has the potential to deliver significant biodiversity net gain on the Site, with 80% gain predicted for habitat biodiversity units.

Permissive Paths – Two permissive paths would be provided as part of the Scheme which would provide access to the local population to open

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space, having a beneficial impact on health and wellbeing.

Economic Benefits – The Scheme would result in 401 net jobs per annum during construction and would contribute to the development of skills needed for the UK's transition to Net Zero by 2050 and described within the Net Zero Strategy: Building Back Greener. It is also estimated that the construction of the Scheme would contribute approximately £22.5 million to the national economy, of which £10.1m would likely be within the local area.

Paragraph 4.1.3

The decision maker should to take into account potential benefits of development proposals including ...contribution to meeting the need for energy infrastructure, job creation and any long-term or wider benefits.

The **Statement of Need [EN010143/APP/7.1]** and Section 5 of the **Planning Statement [EN010143/APP/7.2]** explain that the Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure and low-carbon electricity both during and beyond the critical 2020s timeframe. Maximising the capacity of generation in the resource-rich, well-connected and technically deliverable proposed location for the Scheme, represents a significant and economically rational step forwards in the fight against the global climate emergency.

Section 5.3 of this **Planning Statement [EN010143/APP/7.2]** also sets out the benefits of the Scheme. Along with contributing to a sufficient, reliable and affordable energy system whilst

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helping the Government decarbonise, and meet national climate change targets and budgets, the Scheme provides a number of other benefits which are set out below.

Electricity Generation - Over the 40-year lifetime of the Scheme, it would generate enough electricity to power approximately 147,222 homes per annum based on Ofgem data. This is a significant increase in electricity generation with recognition that more electricity generation is needed to meet demand.

Decarbonisation - The Scheme indicates an overall lifetime carbon reduction, relative to the counterfactual Combined Cycle Gas Turbine (CCGT), of over 5.5 million tCO₂e. The overall greenhouse gas impact of the Scheme is therefore beneficial and significant, as it will play a part in achieving the rate of transition required by nationally set policy commitments and supporting the trajectory towards Net Zero.

Environmental Benefits – The Scheme would provide a number of ecological enhancements through its landscape design. The Scheme would also provide soil improvements as a result of the change from arable farming to grassland. These measures are set out in full in the **Framework LEMP [EN010143/APP/7.14]**. The Applicant is committed to exceeding the Government's 10%

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target for biodiversity net gain as set out in the Environment Act 2021. A **Biodiversity Net Gain (BNG) report [EN010143/APP/6.2]** demonstrates that the Scheme has the potential to deliver significant biodiversity net gain on the Site, with 80% gain predicted for habitat biodiversity units.

Permissive Paths – Two permissive paths would be provided as part of the Scheme which would provide access to the local population to open space, having a beneficial impact on health and wellbeing.

Economic Benefits – The Scheme would result in 401 net jobs per annum during construction and would contribute to the development of skills needed for the UK's transition to Net Zero by 2050 and described within the Net Zero Strategy: Building Back Greener. It is also estimated that the construction of the Scheme would contribute approximately £22.5 million to the national economy, of which £10.1m would likely be within the local area.

Paragraph 4.1.4

The decision maker should take into account environmental, social and economic benefits and adverse impacts, at national, regional and local levels.

The **Statement of Need [EN010143/APP/7.1]** and Section 5 of the **Planning Statement [EN010143/APP/7.2]** explain that the Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure and low-carbon electricity both during and beyond the critical 2020s timeframe. Maximising

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
Paragraph 4.1.7	The IPC 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 IPC should take into account the guidance in Circular 11/95, as revised, on “The Use of Conditions in Planning Permissions” or any successor to it.	<p>the capacity of generation in the resource-rich, well-connected and technically deliverable proposed location for the Scheme, represents a significant and economically rational step forwards in the fight against the global climate emergency.</p> <p>Section 5.3 of this Planning Statement [EN010143/APP/7.2] also sets out the benefits of the Scheme. Along with contributing to a sufficient, reliable and affordable energy system whilst helping the Government decarbonise, and meet national climate change targets and budgets, the Scheme provides a number of other benefits which are set out in paragraph 4.1.2 and 4.1.3 above.</p>
Paragraph 4.1.8	The IPC may take into account 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	<p>Schedule 2 of the Draft DCO sets out the requirements that the Applicant believes are necessary, relevant to planning, relevant to the development to be consented, enforceable, precise and reasonable in all other aspect.</p> <p>At this stage obligations have not yet been identified with East Riding of Yorkshire Council and North Yorkshire Council.</p>

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
Environmental Statement		
Paragraph 4.2.1	<p>All proposals for projects that are subject to the European Environmental Impact Assessment Directive must be accompanied by an Environmental Statement (ES) describing the aspects of the environment likely to be significantly affected by the project. The Directive specifically refers to effects on human beings⁷⁶, fauna and flora, soil, water, air, climate, the landscape, material assets and cultural heritage, and the interaction between them. The Directive requires an assessment of the likely significant effects of the proposed project on the environment, covering the direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects at all stages of the project, and also of the measures envisaged for avoiding or mitigating significant adverse effects.</p>	<p>An Environmental Statement (ES) [EN0101043/APP/6.1] and accompanying appendices [EN0101043/APP/6.2], figures [EN0101043/APP/6.3], non-technical summary [EN010143/APP/6.4] and Environment Mitigation and Commitments Register [EN0101043/APP/6.5] have been submitted with this Application.</p>
Paragraph 4.2.2	<p>To consider the potential effects, including benefits, of a proposal for a project, the IPC will find it helpful if the applicant sets out information on the likely significant social and economic effects of the development, and shows how any likely significant negative effects would be avoided or mitigated. This information could include matters such as employment, equality, community cohesion and well-being.</p>	<p>The likely significant social and economic effects of the development including employment, equality, community cohesion and well-being are set out in Chapter 12: Socio-economics and Land Use, ES Volume 1 [EN010143/APP/6.1]. It also sets out how any likely significant negative effects would be avoided or mitigated.</p>

Habitats and Species Regulations

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
Paragraph 4.3.1	<p>Prior to granting a development consent order, the IPC must, under the Habitats and Species Regulations, (which implement the relevant parts of the Habitats Directive and the Birds Directive in England and Wales) consider whether the project may have a significant effect on a European 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. Further information on the requirements of the Habitats and Species Regulations can be found in a Government Circular. Applicants should also refer to Section 5.3 of this NPS on biodiversity and geological conservation. The applicant should seek the advice of Natural England and/or the Countryside Council for Wales, and provide the IPC with such information as it may reasonably require to determine whether an Appropriate Assessment is required. In the event that an Appropriate Assessment is required, the applicant must provide the IPC with such information as may reasonably be required to enable it to conduct the Appropriate Assessment. This should include information on any mitigation measures that are proposed to minimise or avoid likely effects.</p>	<p>A HRA [EN010143/APP/7.12], has been undertaken and submitted with this Application. Natural England have been consulted with regard to the Appropriate Assessment in accordance with this policy.</p> <p>The Applicant’s appropriate assessment, set out in the HRA concludes that the Scheme has the potential to result in the loss of arable land that is functionally linked to the Lower Derwent Valley SPA/Ramsar and Humber Estuary SPA/Ramsar. Therefore, mitigation will be delivered to offset the permanent loss of supporting habitat for golden plover and pink-footed goose under the operational footprint of the Scheme. A total of 30ha of mitigation habitat will be provided. 15ha of wet grassland will be delivered in the Golden Plover Mitigation Zone adjoining the River Foulness, and 15ha of arable land maintained under a suitable cropping regime and management practices (e.g., longer retention of winter stubbles) will be provided in the Goose Mitigation Zone on a rotational basis. Overall, the HRA concludes that the Scheme would not result in adverse effects on the integrity of the Lower Derwent Valley SPA/Ramsar and Humber Estuary SPA/Ramsar.</p>

Alternatives

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
Paragraph 4.4.1	<p>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, detailed guidance on which falls outside the scope of this NPS. From a policy perspective this NPS does not contain any general requirement to consider alternatives or to establish whether the proposed project represents the best option.</p>	<p>There is no general requirement from a policy perspective to consider alternatives or to establish whether the Scheme represents the ‘best option’. The Planning Statement [EN010143/APP/7.2] sets out how the Scheme accords with policies and legislation where consideration of alternatives may be relevant, such as flood risk and explains how the Scheme has taken account of the locational criteria for solar farms that is set out in relevant policies.</p>
Paragraph 4.4.2	<p>However, applicants are obliged to include in their ES, as a matter of fact, information about the main alternatives they have studied. This should include an indication of the main reasons for the applicant’s choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility;</p> <p>in some circumstances there are specific legislative requirements, notably under the Habitats Directive, for the IPC to consider alternatives. These should also be identified in the ES by the applicant; and</p> <p>in some circumstances, the relevant energy NPSs may impose a policy requirement to consider alternatives (as this NPS does in Sections 5.3, 5.7 and 5.9).</p>	<p>Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1] sets out information in relation to alternatives that is required by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and, as a matter of fact, includes information about the main alternatives studied. The Habitats Regulations Assessment [EN010143/APP/7.12] confirms there is no requirement to consider alternatives due to biodiversity effects. There is no potential for development within nationally designated landscapes. The Order limits are however located partially within the Environment Agency's (EA) fluvial Flood Zone 2 and fluvial Flood Zone 3 and the Order limits include areas of land which are also at medium and high risk of surface water flooding. Therefore consideration of alternatives to meet the flood risk sequential test policy requirement is set</p>
Paragraph 4.4.3	<p>Where there is a policy or legal requirement to consider alternatives the applicant should describe the alternatives considered in compliance with these requirements. Given the level and urgency of need for new energy infrastructure, the IPC should, subject to any relevant legal requirements (e.g. under the Habitats Directive) which indicate otherwise,</p>	<p>The Order limits are however located partially within the Environment Agency's (EA) fluvial Flood Zone 2 and fluvial Flood Zone 3 and the Order limits include areas of land which are also at medium and high risk of surface water flooding. Therefore consideration of alternatives to meet the flood risk sequential test policy requirement is set</p>

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
	<p>be guided by the following principles when deciding what weight should be given to alternatives:</p> <p>the consideration of alternatives in order to comply with policy requirements should be carried out in a proportionate manner;</p> <p>the IPC 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 and climate change benefits) in the same timescale as the proposed development;</p> <p>where (as in the case of renewables) legislation imposes a specific quantitative target for particular technologies or (as in the case of nuclear) there is reason to suppose that the number of sites suitable for deployment of a technology on the scale and within the period of time envisaged by the relevant NPSs is constrained, the IPC should not reject an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site, and it should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals;</p> <p>alternatives not among the main alternatives studied by the applicant (as reflected in the ES) should only be considered to the extent that the IPC thinks they are both important and relevant to its decision;</p>	<p>out in section 3.4 and section 3.7 Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1]. A Flood Risk Assessment is provided with the Application in Appendix 9-3, ES Volume 2 [EN010143/APP/6.2] which includes the Sequential Test Report at Annex C and provides further information on the sequential test and alternatives considered. Therefore, the Application satisfies all requirements to consider alternatives related to flood risk.</p>

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as the IPC must decide an application in accordance with the relevant NPS (subject to the exceptions set out in the Planning Act 2008), if the IPC concludes that a decision to grant consent to a hypothetical alternative proposal would not be in accordance with the policies set out in the relevant NPS, the existence of that alternative is unlikely to be important and relevant to the IPC's decision;

alternative proposals which mean the necessary development could not proceed, for example because the alternative proposals are not commercially viable or alternative proposals for sites would not be physically suitable, can be excluded on the grounds that they are not important and relevant to the IPC's decision;

alternative proposals which are vague or inchoate can be excluded on the grounds that they are not important and relevant to the IPC's decision; and

it is intended that potential alternatives to a proposed development should, wherever possible, be identified before an application is made to the IPC in respect of it (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 IPC may place the onus on the person proposing the alternative to provide the evidence for its suitability as such and the IPC should not necessarily expect the applicant to have assessed it

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Criteria for “Good design” for energy infrastructure		
Paragraph 4.5.1	The visual appearance of a building 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. Applying “good design” to energy projects should produce sustainable infrastructure sensitive to place, efficient in the use of natural resources 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 much energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area.	As detailed in the Design and Access Statement [EN010143/APP/7.3] and Section 6 of the Planning Statement [EN010143/APP/7.2] the Scheme has been informed by a detailed and sensitive iterative design process. This has involved taking account of the context and features of the land within the Order limits, sensitive receptors, information from environmental surveys and feedback from stakeholders. The design also takes into account constraints and opportunities in order to develop a good design that balances the need to maximise renewable energy generation from the Scheme along with the minimisation of potential impacts or provision of mitigation and environmental enhancements where practicable. The design process and basis of design decisions are set out in Chapter 3: Alternatives and Design Evolution [EN010143/APP/6.1], Volume 1 of the ES [EN010142/APP/6.1] and the Design and Access Statement [EN010142/APP/7.3] .
Paragraph 4.5.2	Good design is also a means by which many policy objectives in the NPS can be met, for example the impact sections show how good design, in terms of siting and use of appropriate technologies can help mitigate adverse impacts such as noise.	The Outline Design Principles Statement [EN010143/APP/7.4] secure elements of good design and ensures they are implemented.
Paragraph 4.5.3	In the light of the above, and given the importance which the Planning Act 2008 places on good design and sustainability, the IPC needs to be satisfied that energy	As detailed above, the Scheme adheres to these principles as far as practicable. Whilst the appearance of solar panels is largely set by their

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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. In so doing, the IPC should satisfy itself that the applicant has taken into account 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) as far as possible. 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.

function, the site layout, landscaping and access design have all been designed to reflect good design principles as detailed in the **Design and Access Statement [EN010143/APP/7.3]**.

Paragraph 4.5.4

For the IPC to consider the proposal for a project, applicants should be able to demonstrate in their application documents how the design process was conducted and how the proposed design evolved. Where a number of different designs were considered, applicants should set out the reasons why the favoured choice has been selected. In considering applications the IPC 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.

Chapter 3: Alternatives and Design Evolution of the ES [EN010118/APP/6.1] describes in detail the several stages of design evolution. has been informed by ongoing environmental assessments, engineering and design considerations, as well as engagement with stakeholders. Alternative design options considered are also described in **Chapter 3: Alternatives and Design Evolution of the ES [EN010118/APP/6.1]** and the **Design and Access Statement [EN010142/APP/7.3]**.

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Paragraph 4.5.5	Applicants and the IPC should consider taking independent professional advice on the design aspects of a proposal. In particular, Design Council CABE can be asked to provide design review for nationally significant infrastructure projects and applicants are encouraged to use this service.	The Applicant has engaged extensively with local authorities, key stakeholders and the community in the development of the design of the Scheme., as set out in the Consultation Report [EN010143/APP/5.1] .
Climate Change Adaptation		
Paragraph 4.8.3	To support planning decisions, the Government produces a set of UK Climate Projections and is developing a statutory National Adaptation Programme. In addition, the Government’s 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. The IPC may take into account energy utilities’ reports to the Secretary of State when considering adaptation measures proposed by an applicant for new energy infrastructure	As stated in Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1] UKCP18 climate projections have been used to identify potential future climate change impacts on the Scheme. The potential impacts of climate change on the Scheme, and associated mitigation measures, are outlined in Sections 6.6, 6.7, 6.8 and 6.9 of Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1] .
Paragraph 4.8.4	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	No additional impacts have been identified as a result of the climate change mitigation measures presented in Chapter 6: Climate Change of the ES [EN010143/APP/6.1] .
Paragraph 4.8.5	New energy infrastructure will typically be a long-term investment and will need to remain operational over many decades, in the face of a changing climate. Consequently, applicants must consider the impacts of climate change when planning the location, design, build, operation and,	As outlined in Chapter 6: Climate Change of the ES [EN010143/APP/6.1] , the effects of climate change have been taken into account in the design of the Scheme, and when considering how it will

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where appropriate, decommissioning of new energy infrastructure. The ES should set out how the proposal will take account of the projected impacts of climate change. While not required by the EIA Directive, this information will be needed by the IPC

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be constructed, operated and decommissioned. This includes, during construction:

- a. Storing topsoil and other construction/decommissioning materials outside of the 1 in 100-year floodplain extent (Flood Zone 3), as far as reasonably practicable (noting that no development will occur within Flood Zone 3 Areas of the Solar PV Site);
- b. Named person(s) – likely the Safety, Health and Environment Manager/ Ecological Clerk of Works (ECoW) – to monitor weather forecasts and receive Environment Agency flood alerts to allow works to be planned and carried out accordingly to manage extreme weather conditions, such as storms and flooding; and
- c. Health and safety plans developed for construction/decommissioning activities will be required to account for potential climate change impacts on workers, such as flooding and heatwaves. To include measures such as toolbox talks on training on dangers of extreme weather conditions.

Further climate change resilience measures embedded within the Scheme, particularly in relation to flood risk are included in the **Framework CEMP [EN010143/APP/7.7]**. The specific flood risk impacts and associated

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mitigation measures are discussed in more detail in **Chapter 9: Flood Risk, Drainage and Surface Water, ES Volume 1 [EN010143/APP/6.2]**.

In addition, adaptation measures to reduce the effect of projected temperature increases on electrical equipment over the course of the Scheme's design life have been taken into account. PV inverters will have a cooling system installed to control the temperature and allow the inverters to operate efficiently in warmer conditions. The PV modules and transformers have a wide range of acceptable operation temperatures, and it has been determined that increasing temperatures will not adversely affect their operation.

A Framework CEMP [EN010143/APP/7.7], Framework OEMP [EN010143/APP/7.8] and Framework DEMP [EN010143/APP/7.9] will be developed into a detailed CEMP, OEMP and DEMP prior to the construction phase commences as a means to secure the embedded mitigation measures mentioned above.

Chapter 6: Climate Change of the ES [EN010143/APP/6.1] sets out how the Scheme will take account of the projected impacts of climate change.

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Paragraph 4.8.6	The IPC 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 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. Should a new set of UK Climate Projections become available after the preparation of the ES, the IPC should consider whether they need to request further information from the applicant.	As stated in Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1] UKCP18 climate projections have been used to identify potential future climate change impacts on the Scheme. Future climate change impacts are reviewed based on the UKCP18 projections and have been taken into account in the design of the Scheme. Mitigation and adaptation measures have considered the full lifetime of the Scheme.
Paragraph 4.8.7	Applicants should apply as a minimum, the emissions scenario that the Independent Committee on Climate Change suggests the world is currently most closely following – and the 10%, 50% and 90% estimate ranges. These results should be considered alongside relevant research which is based on the climate change projections	The RCP8.5 scenario has been used to generate the UKCP18 climate projections used. As per the UKCP18 user guidance, this is the closest available model to the ‘high emissions scenario’ available within UKCP09, which were the latest available projections at the time of publication of the NPS EN-1. The UKCP18 climate projections are presented in Section 6.5 of Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1] .
Paragraph 4.8.8	The IPC 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	As stated in Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1] , UKCP18 climate projections have been used to identify potential future climate change impacts on the Scheme. Future climate change impacts are reviewed based on the UKCP18 projections. Adaptation measures have been incorporated and the design

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	Climate Change or EA) and that necessary action can be taken to ensure the operation of the infrastructure over its estimated lifetime.	is therefore not considered likely to be seriously affected by the more radical changes to the climate
Paragraph 4.8.9	Where energy infrastructure has safety critical elements (for example parts of new fossil fuel power stations or some electricity sub-stations), the applicant should apply the high emissions scenario (high impact, low likelihood) to those elements. Although the likelihood of this scenario is thought to be low, it is appropriate to take a more risk-averse approach with elements of infrastructure which are critical to the safety of its operation	The RCP8.5 scenario has been used to generate the UKCP18 climate projections used. As per the UKCP18 user guidance, this is the closest available model to the ‘high emissions scenario’ available within UKCP09, which were the latest available projections at the time of publication of the NPS EN-1. The UKCP18 climate projections are presented in Section 6.5 of Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1] .
Paragraph 4.8.10	If any adaptation measures give rise to consequential impacts (for example on flooding, water resources or coastal change) the IPC 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.	No consequential impacts have been identified as a result of climate change adaptation measures.
Paragraph 4.8.11	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	Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1] utilises the latest UK climate projections (UKCP18) to determine the historic and future baseline conditions and uses these projections to embedded adaptive measures into the design. Adaptation measures have been embedded in the design and take into account the

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Adaptation measures can be required to be implemented at the time of construction where necessary and appropriate to do so. However, where they are necessary to deal with the impact of climate change, and that measure would have an adverse effect on other aspects of the project and/or surrounding environment (for example coastal processes), the IPC may consider requiring the applicant to ensure that the adaptation measure could be implemented should the need arise, rather than at the outset of the development (for example increasing height of existing, or requiring new, sea walls).

effects of climate change predicted by these projections.

As outlined in **Chapter 6: Climate Change of the ES [EN010143/APP/6.1]**, the effects of climate change have been taken into account in the design of the Scheme, and when considering how it will be constructed, operated and decommissioned.

A **Framework CEMP [EN010143/APP/7.7]** is included within the DCO application. The **Framework CEMP [EN010143/APP/7.7]** will be developed into a detailed CEMP prior to the construction phase commences as a means to secure the embedded mitigation measures.

A **Framework OEMP [EN010143/APP/7.8]** has been submitted as part of the DCO application. This will be developed into a detailed OEMP prior to the construction phase commences as a means to secure the embedded mitigation measures.

The **Framework Decommissioning Environmental Management Plan [EN010143/APP/7.9]** will be developed into a detailed DEMP prior to decommissioning as a means to secure the embedded mitigation measures.

Grid Connection

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
Paragraph 4.9.1	<p>The connection of a proposed electricity generation plant to the electricity network is an important consideration for applicants wanting to construct or extend generation plant. In the market system, it is for the applicant to ensure that there will be necessary infrastructure and capacity within an existing or planned transmission or distribution network to accommodate the electricity generated. The applicant will liaise with National Grid who own and manage the transmission network in England and Wales or the relevant regional Distribution Network Operator (DNO) to secure a grid connection. It may be the case that the applicant has not received or accepted a formal offer of a grid connection from the relevant network operator at the time of the application, although it is likely to have applied for one and discussed it with them. This is a commercial risk the applicant may wish to take for a variety of reasons, although the IPC will want to be satisfied that there is no obvious reason why a grid connection would not be possible</p>	<p>The Applicant has secured a connection to the National Grid via a new below ground grid connection cable located within the Grid Connection Corridor. This will connect the new on-site Substation with the existing National Grid Drax Substation. Further details are included in the Grid Connection Statement [EN010143/APP/7.5].</p> <p>The Applicant is seeking a DCO for the construction, operation (including maintenance) and decommissioning of a solar photovoltaic (PV) electricity generating facility, with a total capacity exceeding 50 megawatts (MW) and export connection to the national grid, at National Grid Drax Substation.</p> <p>The DCO covers all infrastructure required to construct, operate (including maintain) and decommission the Scheme, with no further planning consent expected to be needed.</p>
Paragraph 4.9.2	<p>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. The Government therefore envisages that wherever possible, applications for new generating stations and related infrastructure should be contained in a single application to the IPC or in separate applications submitted in tandem which have been prepared in an integrated way. However this may not always be possible, nor the best course in terms of delivery of the project in a timely way, as different aspects may have different lead-in times and be undertaken</p>	

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	<p>by different legal entities subject to different commercial and regulatory frameworks (for example grid companies operate within OFGEM controls). So the level of information available on the different elements may vary. In some cases applicant(s) may therefore decide to put in an application that seeks consent only for one element but contains some information on the second. Where this is the case, the applicant should explain the reasons for the separate application.</p>	
<p>Pollution Control and Other Environmental Regulatory Regimes</p>		
<p>Paragraph 4.10.1</p>	<p>Issues relating to discharges or emissions from a proposed project which affect air quality, water quality, land quality and the marine environment, or which include noise and vibration may be subject to separate regulation under the pollution control framework or other consenting and licensing regimes.</p>	<p>Effects on land quality are considered in the Phase 1 Preliminary Risk Assessment (PRA) Report provided as Appendix 16-2, ES Volume 2 [EN010143/APP/6.2]. A summary of the assessment is provided in Section 16.4 of Chapter 16: Other Environmental Topics ES Volume 1 [EN010143/APP/6.1].</p>
<p>Paragraph 4.10.2</p>	<p>The planning and pollution control systems are separate but complementary. The planning system controls the development and use of land in the public interest. It plays a key role in protecting and improving the natural environment, public health and safety, and amenity, for example by attaching conditions to allow developments which would otherwise not be environmentally acceptable to proceed, and preventing harmful development which cannot be made acceptable even through conditions. Pollution</p>	<p>This is considered in the Phase 1 PRA Report provided as Appendix 16-2, ES Volume 2 [EN010134/APP/6.1]. A summary of the assessment is provided in Section 16.4 of Chapter 16: Other Environmental Topics ES Volume 1 [EN010143/APP/6.1].</p>

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	<p>control is concerned with preventing pollution through the use of measures to prohibit or limit the releases of substances to the environment from different sources to the lowest practicable level. It also ensures that ambient air and water quality meet standards that guard against impacts to the environment or human health.</p>	
Paragraph 4.10.3	<p>In considering an application for development consent, the IPC should focus on whether the development itself is an acceptable use of that land, and on the impacts of that use, rather than the control of processes, emissions or discharges themselves. The IPC 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. It should act to complement but not seek to duplicate them.</p>	<p>Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 [EN010143/APP/6.1] outlines pollution controls for the construction and operation phases of development. Other required permits and consents are listed within the chapter. A Framework CEMP [EN010143/APP/7.7] is also included.</p>
Paragraph 4.10.4	<p>Applicants should consult the Marine Management Organisation (MMO) on nationally significant projects which would affect, or would be likely to affect, any relevant marine areas as defined in the Planning Act 2008 (as amended by s.23 of the Marine and Coastal Access Act 2009). The IPC consent may include a deemed marine licence and the MMO will advise on what conditions should apply to the deemed marine licence. The IPC and MMO should cooperate closely to ensure that energy NSIPs are licensed in accordance with environmental legislation, including European directives.</p>	<p>The Grid Connection Corridor crosses the River Ouse at a point where it is tidal. A deemed Marine License for these works is sought as part of the DCO Application.</p> <p>The crossing of the River Ouse will be via horizontal directional drill (HDD) with no direct impacts to the River, or its banks. It is therefore not anticipated that the Scheme would have any significant effects on the marine environment.</p>

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
Paragraph 4.10.5	Many projects covered by this NPS will be subject to the Environmental Permitting (EP) regime, which also incorporates operational waste management requirements for certain activities. When a developer applies for an EP, the relevant regulator (usually EA but sometimes the local authority) requires that the application demonstrates that processes are in place to meet all relevant EP requirements. In considering the impacts of the project, the IPC may wish to consult the regulator on any management plans that would be included in an EP application.	Environmental Permits will be sought prior to construction where relevant.
Paragraph 4.10.6	Applicants are advised to make early contact with relevant regulators, including the EA and MMO, to discuss their requirements for environmental permits and other consents. This will help ensure that applications take account of all relevant environmental considerations and that the relevant regulators are able to provide timely advice and assurance to the IPC. Wherever possible, applicants are encouraged to submit applications for Environmental Permits and other necessary consents at the same time as applying to the IPC for development consent.	Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 [EN010143/APP/6.1] outlines consultation undertaken to date to inform the design and assessment of the Scheme. This has included consultation with the Environment Agency, Lead Local Flood Authority (LLFA) and Internal Drainage Boards (IDBs).
Paragraph 4.10.7	The IPC should be satisfied that development consent can be granted taking full account of environmental impacts. Working in close cooperation with EA and/or the pollution control authority, and other relevant bodies, such as the MMO, Natural England, the Countryside Council for Wales, Drainage Boards, and water and sewerage undertakers, the	A Phase 1 Preliminary Risk Assessment (PRA) report has been prepared, covering land within the Order limits, and is available in Appendix 16-3, ES Volume 2 [EN101043/APP/6.2] . The information collected as part of the PRA suggest that the potential risks that have been identified from potential contaminated land are

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
	<p>IPC should be satisfied, before consenting any potentially polluting developments, that:</p> <p>the relevant pollution control authority is satisfied that potential releases can be adequately regulated under the pollution control framework; and</p> <p>the effects of existing sources of pollution in and around the site are not such that the cumulative effects of pollution when the proposed development is added would make that development unacceptable, particularly in relation to statutory environmental quality limits.</p>	<p>very low to moderate. The highest risks have been identified in the areas surrounding the former Brighton Airfield, historical landfill sites and current Drax Power Station.</p> <p>A number of environmental design and management measures will be employed as standard best practice to minimise impacts to both human health and controlled waters during the construction and decommissioning phases of the Scheme. These will be incorporated into the Framework CEMP, OEMP and DEMP ([EN010143/APP/7.7], [EN010143/APP/7.8], [EN010143/APP/7.9] which will be provided alongside the ES [EN010143/APP/6.1] as part of this Application.</p> <p>The information collected as part of the PRA suggests that there are no significant constraints with regards to contamination of soil and groundwater that would limit the development of the Site for a solar PV project.</p> <p>The potential risks that have been identified have all been assessed by the PRA as being moderate/low, and area presented in Chapter 16: Other Environmental Topics, ES Volume 1 [EN010143/APP/6.1]. As stated in Chapter 16: Other Environmental Topics, ES Volume 1 [EN010143/APP/6.1] provided that the requirements of relevant policy and legislation</p>

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		<p>relating to land contamination and remediation are integrated within the design and appropriate mitigation measures are applied during the demolition and construction phases of each cumulative scheme, it is considered that the cumulative effect on ground conditions will be negligible.</p>
<p>Paragraph 4.10.8</p>	<p>The IPC should not refuse consent on the basis of pollution impacts unless it has good reason to believe that any relevant necessary operational pollution control permits or licences or other consents will not subsequently be granted</p>	<p>There are not predicted to be any significant pollution impacts associated with the Scheme (Chapter 16: Other Environmental Topics, ES Volume 1 [EN010143/APP/6.1]). The Applicant is not aware of any reason that consent would not be granted for consents listed in the Consents and Agreements Position Statement [EN010143/APP/3.3].</p>
<p>Paragraph 4.11.4</p>	<p>Applicants seeking to develop infrastructure subject to the COMAH regulations should make early contact with the Competent Authority. 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. The Secretary of State should be satisfied that an assessment has been done where required and that the</p>	<p>The Scheme is not subject to the COMAH Regulations.</p>

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
	Competent Authority has assessed that it meets the safety objectives described above.	
Health		
Paragraph 4.13.1	Energy production has the potential to impact on the health and well-being (“health”) of the population. Access to energy is clearly beneficial to society and to our health as a whole. However, the production, distribution and use of energy may have negative impacts on some people’s health.	Chapter 14: Human Health of the ES [EN010143/APP/6.1] includes an assessment of the Scheme’s impact on human health using IEMA guidance on health, which is a methodology for determining the significance of health effects developed by IEMA and specialists in the Human Health field.
Paragraph 4.13.2	As described in the relevant sections of this NPS and in the technology specific NPSs, where the proposed project has an effect on human beings, the ES should assess these effects for each element of the project, identifying any adverse health impacts, and identifying measures to avoid, reduce or compensate for these impacts as appropriate. The impacts of more than one development may affect people simultaneously, so the applicant and the IPC should consider the cumulative impact on health.	<p>Prior to IEMA’s guidance being issued in November 2022 there was no guidance which provided a justified definition of, or methodology for, determining the significance for health effects. The Scoping Report (issued in September 2022) therefore presented a proposed methodology for an assessment based upon HUDU’s Rapid HIA Toolkit which would identify positive, neutral, negative or uncertain effects without a judgement as to whether these effects were significant.</p> <p>The November 2022 IEMA guidance has therefore been adopted in preference to the methodology proposed at Scoping. The change in methodology was agreed with consultees at the four meetings outlined in section 14.3 and is in line with what was recommended by the Planning Inspectorate and</p>

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		<p>OHID in the Scoping Opinion (Appendix 1-2, ES Volume 2 [EN010143/APP/6.2]).</p> <p>Chapter 14: Human Health of the ES [EN010143/APP/6.1] assesses the effect on human health for each element of the project, and identifies any adverse impacts, and measures to avoid, reduce or compensate for these impacts as appropriate. The cumulative impact of the Scheme on health is outlined in Section 14.10 of Chapter 14: Human Health of the ES [EN010143/APP/6.1].</p>
Paragraph 4.13.3	The direct impacts on health may include increased traffic, air or water pollution, dust, odour, hazardous waste and substances, noise, exposure to radiation, and increases in pests	<p>Chapter 14: Human Health of the ES [EN010143/APP/6.1] includes an assessment of the Scheme’s impact on human health using IEMA guidance on health, which is a methodology for determining the significance of health effects developed by IEMA and specialists in the Human Health field. The assessment includes the effects of traffic, air or water pollution, dust, odour, hazardous waste and substances, noise, exposure to radiation, and increases in pests.</p>
Paragraph 4.13.4	New energy infrastructure may also affect the composition, size and proximity of the local population, and in doing so have indirect health impacts, for example if it in some way affects access to key public services, transport or the use of open space for recreation and physical activity	
Paragraph 4.13.5	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 constitute a reason to refused consents or require specific	It also considers impacts on access to healthcare services and other social infrastructure, access to open space and nature, access to work and training, and social cohesion and neighbourhoods. Health and wellbeing perceptions and impacts to

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	mitigation under the Planning Act 2008. However, the IPC will want to take account of health concerns when setting requirements relating to a range of impacts such as noise.	<p>the mental health of local residents has also been taken into account throughout the assessment.</p> <p>Chapter 14: Human Health of the ES [EN010143/APP/6.1] concludes that no significant adverse effects to health are predicted as a result of the Scheme.</p>

Generic Impacts

Air Quality and Emissions

Paragraph 5.2.6	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 Environmental Statement (ES).	Chapter 16, Other Environmental Topics, ES Volume 1 [EN010143/APP/6.1] assesses the impacts of the construction and decommissioning of the Scheme on local air quality.
Paragraph 5.2.7	<p>The ES should describe:</p> <p>any significant air emissions, their mitigation and any residual effects distinguishing between the project stages and taking account of any significant emissions from any road traffic generated by the project;</p> <p>the predicted absolute emission levels of the proposed project, after mitigation methods have been applied;</p> <p>existing air quality levels and the relative change in air quality from existing levels; and</p> <p>any potential eutrophication impacts</p>	<p>The assessment considers both ecological receptors as well as effects to human health. There are no air quality management areas in East Riding of Yorkshire whereas there is one located in Selby approximately 8.2km away from the Order limits.</p> <p>A dust risk assessment has been undertaken as required by NPS EN-1 paragraph 5.6.4 and can be found in Chapter 16, Other Environmental Topics, ES Volume 1 [EN010143/APP/6.1].</p>

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
Paragraph 5.2.8	Many activities involving air emissions are subject to pollution control. The considerations set out in Section 4.10 on the interface between planning and pollution control therefore apply.	
Paragraph 5.2.9	The IPC should generally give air quality considerations substantial weight where a project would lead to a deterioration in air quality in an area, or leads to a new area where air quality breaches any national air quality limits. 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 national air quality limits.	<p>Chapter 16: Other Environmental Topics of the ES [EN010143/APP/6.1] includes an Air Quality Assessment. The Assessment confirms that there is likely to be no significant impact on local air quality during construction, operation and decommissioning.</p> <p>The Framework CEMP [EN010143/APP/7.7] and Framework DEMP [EN/010143/APP/7.9] include mitigation measures from the IAQM dust guidance. A detailed CEMP and DEMP will be prepared in accordance with these prior to the construction and decommissioning, and will be secured by the DCO.</p>
Paragraph 5.2.10	In all cases the IPC must take account of any relevant statutory air quality limits. Where a project is likely to lead to a breach of such limits the developers should work with the relevant authorities to secure appropriate mitigation measures to allow the proposal to proceed. In the event that a project will lead to non-compliance with a statutory limit the IPC should refuse consent	
Paragraph 5.2.11-5.2.13	The IPC 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.	
Paragraph 5.2.12	In doing so the IPC may refer to the conditions and advice in the Air Quality Strategy or any successor to it	

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Paragraphs 5.2.13	The mitigations identified in Section 5.13 on traffic and transport impacts will help mitigate the effects of air emissions from transport	
Biodiversity and Geological Conservation		
Paragraph 5.3.3	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, on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity. The applicant should provide environmental information proportionate to the infrastructure where EIA is not required to help the IPC consider thoroughly the potential effects of a proposed project.	<p>Section 8.5 of Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] sets out all the designated sites of ecological or geological conservation importance; protected species; and habitats and other species identified as being of principal importance for the conservation of biodiversity within the study area for the Scheme.</p> <p>Section 8.7 of Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] go on to set out the expected effects on the above receptors during the construction, operation and decommissioning phases of the Scheme.</p> <p>Section 8.8 and 8.9 of Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] and the HRA [EN010143/APP/7.12] concludes that the Scheme has the potential to result in the loss of arable land that is functionally linked to the Lower Derwent Valley SPA/Ramsar and Humber Estuary SPA/Ramsar. Therefore, mitigation will be delivered to offset the permanent loss of supporting habitat for golden plover and pink-footed goose under the operational footprint of the Scheme. A total of 30ha of mitigation habitat will be</p>

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provided. 15ha of wet grassland will be delivered in the Golden Plover Mitigation Zone adjoining the River Foulness, and 15ha of arable land maintained under a suitable cropping regime and management practices (e.g., longer retention of winter stubbles) will be provided in the Goose Mitigation Zone on a rotational basis.

Overall, it is concluded that the Scheme would not result in any adverse effects on the integrity of the Lower Derwent Valley SPA/Ramsar and Humber Estuary SPA/Ramsar. The scope of the **ES [EN010143/APP/6.1]** accords with this policy.

Paragraph 5.3.4

The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests

As set out in **Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1]** the Scheme design has evolved to avoid statutorily designated sites where practicable. Measures embedded within the Scheme design ensure that statutory designated sites are not impacted during construction, operation or decommissioning (e.g., through siting construction routes away from designated sites where practicable, incorporating suitable buffer zones and erection of temporary construction fencing to avoid incursion into exclusion zones).

The Scheme has been designed with the view to avoid key nature conservation and ecological features present within or adjacent to the Site as far as practicable. Accordingly, the following minimum buffers from key habitat features have

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been applied where practicable (e.g., some features such as hedgerows and waterbodies will be crossed):

- a. 15m from woodlands (some cabling will lie within 15m of woodland);
- b. 10m from hedgerows increasing to 15m where there are hedgerow trees;
- c. 15m from individual trees;
- d. a minimum of 10m from watercourses (bank top) and ponds, to protect riparian habitats and to mitigate for potential hazards such as chemical and soils spills into watercourses/ waterbodies. This buffer is extended to at least 30m for the River Derwent, River Ouse and Watercourse DE53.

In addition, as noted above, **Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1]** and the **HRA [EN010143/APP/7.12]** explain that the Applicant has sought to prevent significant adverse effects on the integrity of Lower Derwent Valley SPA/Ramsar and the Humber Estuary SPA/Ramsar, by providing mitigation in the form of maintained agricultural land and creation of permanent wet/damp grassland will be provided as part of the Ecology Mitigation Areas 1g and 1h. Within this area a minimum of 30 ha of land (an amount that mirrors the functional field size

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supporting recorded peak counts of golden plover and pink-footed goose) will be specifically maintained on an annual basis to deliver adequate habitat to offset the loss of arable farmland used by golden plover and pink-footed goose. These would also be used by Skylark.

To minimise any potential for noise disturbance to otter using the River Derwent, River Ouse and Watercourse DE53, **Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1]** states that noise fencing will be utilised surrounding the HDD entry points.

The Scheme would include the provision of species rich grassland beneath the solar PV panels, which would be suitable for grazing whilst offering greater species diversity than the existing arable land.

The Scheme would provide extensive planting of woodland, hedgerow and an orchard which would all provide increases ecological connectivity and habitat.

Habitat boxes will also be installed on suitable features (buildings and trees) within the Site to provided additional nesting and roosting opportunities for bats and a range of bird species, including barn owl. A number of reptile and

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amphibian hibernacula/refugia will also be provided.

The **Framework LEMP [EN010143/APP/7.14]** contains details of all ecological mitigation and enhancements. A detailed LEMP will be prepared in accordance with this and will be secured by a requirement in the DCO.

The Applicant is committed to exceeding the Government's 10% target for biodiversity net gain as set out in the Environment Act 2021. A **Biodiversity Net Gain (BNG) report [EN010143/APP/6.2]**, Natural England's Biodiversity Metric 4.0, has been produced for the DCO Application. This report demonstrates that the Scheme has the potential to deliver significant biodiversity net gain on the Site, with 80% gain predicted for habitat biodiversity units.

The Scheme has therefore taken advantage of opportunities to conserve and enhance biodiversity and accords with this policy.

Paragraph 5.3.6

In having regard to the aim of the Government's biodiversity strategy the IPC should take account of the context of the challenge of climate change: failure to address this challenge will result in significant adverse impacts to biodiversity. The policy set out in the following sections recognises the need to protect the most important biodiversity and geological conservation interests. The

The **Statement of Need [EN010143/APP/7.1]** and Section 5 of the **Planning Statement [EN010143/APP/7.2]** explain that the Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure and low-carbon electricity both during and beyond the critical 2020s timeframe. Maximising

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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 IPC may take account of any such net benefit in cases where it can be demonstrated.

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the capacity of generation in the resource-rich, well-connected and technically deliverable proposed location for the Scheme, represents a significant and economically rational step forwards in the fight against the global climate emergency.

As noted by the policy, failure to address climate change will result in significant adverse impacts to biodiversity. Without the Scheme, a significant and vital opportunity to develop a large-scale low-carbon generation scheme will have been passed over, increasing materially the risk that future Carbon Budgets and Net Zero 2050 will not be achieved.

By enhancing biodiversity within the Order limits, and by generating renewable electricity and thereby helping to address the causes of climate change, the Scheme delivers benefits in relation to both elements of this policy.

The Applicant committees committed to exceeding the Government's 10% target for biodiversity net gain as set out in the Environment Act 2021. A **Biodiversity Net Gain (BNG) report [EN010143/APP/6.2]**, Natural England's Biodiversity Metric 4.0, has been produced for the DCO Application. This report demonstrates that the Scheme has the potential to deliver significant

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
Paragraph 5.3.7	As a general principle, and subject to the specific policies below, development should aim to avoid significant harm to biodiversity and geological conservation interests, including through mitigation and consideration of reasonable alternatives (as set out in Section 4.4 above); where significant harm cannot be avoided, then appropriate compensation measures should be sought.	<p>biodiversity net gain on the Site, with 80% gain predicted for habitat biodiversity units.</p> <p>Section 8.8 and 8.9 of Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] and the HRA [EN010143/APP/7.12] concludes that the Scheme has the potential to result in the loss of arable land that is functionally linked to the Lower Derwent Valley SPA/Ramsar and Humber Estuary SPA/Ramsar.</p> <p>Therefore, mitigation will be delivered to offset the permanent loss of supporting habitat for golden plover and pink-footed goose under the operational footprint of the Scheme. A total of 30ha of mitigation habitat will be provided. 15ha of wet grassland will be delivered in the Golden Plover Mitigation Zone adjoining the River Foulness, and 15ha of arable land maintained under a suitable cropping regime and management practices (e.g., longer retention of winter stubbles) will be provided in the Goose Mitigation Zone on a rotational basis.</p> <p>Overall, it is concluded that the Scheme would not result in any adverse effects on the integrity of the Lower Derwent Valley SPA/Ramsar and Humber Estuary SPA/Ramsar.</p> <p>Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] also states that with the implementation of suitable embedded mitigation,</p>

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Paragraph 5.3.8	In taking decisions, the IPC 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.	residual effects during the construction, operation and decommissioning of the Scheme would not result in any significant effects on important ecological features.
Paragraph 5.3.9	The most important sites for biodiversity are those identified through international conventions and European Directives. The Habitats Regulations provide statutory protection for these sites but do not provide statutory protection for potential Special Protection Areas (pSPAs) before they have been classified as a Special Protection Area. For the purposes of considering development proposals affecting them, as a matter of policy the Government wishes pSPAs to be considered in the same way as if they had already been classified. Listed Ramsar sites should, also as a matter of policy, receive the same protection.	<p>Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] describes and assesses all designated sites of nature conservation that relate to the Scheme, providing appropriate weight to their level of designation.</p> <p>Section 8.8 and 8.9 of Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] and the HRA [EN010143/APP/7.12] concludes that the Scheme has the potential to result in the loss of arable land that is functionally linked to the Lower Derwent Valley SPA/Ramsar and Humber Estuary SPA/Ramsar. Therefore, mitigation will be delivered to offset the permanent loss of supporting habitat for golden plover and pink-footed goose under the operational footprint of the Scheme. A total of 30ha of mitigation habitat will be provided. 15ha of wet grassland will be delivered in the Golden Plover Mitigation Zone adjoining the River Foulness, and 15ha of arable land maintained under a suitable cropping regime and management practices (e.g., longer retention of</p>
Paragraph 5.3.10	Many SSSIs are also designated as sites of international importance and will be protected accordingly. Those that are not, or those features of SSSIs not covered by an international designation, should be given a high degree of	

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	<p>protection. All National Nature Reserves are notified as SSSIs.</p>	<p>winter stubbles) will be provided in the Goose Mitigation Zone on a rotational basis.</p>
<p>Paragraph 5.3.11</p>	<p>Where a proposed development on land within or outside an SSSI is likely to have an adverse effect on an SSSI (either individually or in combination with other developments), development consent should not normally be granted. Where an adverse effect, after mitigation, on the site's notified special interest features is likely, an exception should only be made where the benefits (including need) of the development at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of SSSIs. The IPC 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</p>	<p>Overall, it is concluded that the Scheme would not result in any adverse effects on the integrity of the Lower Derwent Valley SPA/Ramsar and Humber Estuary SPA/Ramsar.</p> <p>Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] also sets out that the Grid Connection Corridor crosses the River Derwent SAC, an Internationally Designated Nature Site and the River Derwent SSSI, a Nationally Designated Nature Site. The River Derwent SAC/SSSI will be crossed using HDD, therefore there would be no direct impacts to the River Derwent and associated riparian habitats.</p> <p>Measures will also be implemented to minimise visual, lighting and noise disturbance on ecological receptors. These are outlined in the Framework CEMP [EN010143/APP/7.7] and secured within a detailed CEMP as through the DCO.</p>
<p>Paragraph 5.3.13</p>	<p>Sites of regional and local biodiversity and geological interest, which include Regionally Important Geological Sites, Local Nature Reserves and Local Sites, have a fundamental role to play in meeting overall national biodiversity targets; contributing to the quality of life and the well-being of the community; and in supporting research and education. The IPC should give due consideration to</p>	<p>As set out in Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] there are two non-statutory sites of nature conservation within the Order limits. These comprise Tottering Lane, Gribthorpe Local Wildlife Site (LWS) and Wressle Verge LWS.</p>

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such regional or local designations. However, given the need for new infrastructure, these designations should not be used in themselves to refuse development consent.

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To limit disturbance to habitat inside these LWS during construction, the working area for the cable installation across the verges will be kept to a minimum of 5m width inside the LWSs and no spoil, materials or vehicles will be stored within the LWS. Once the cable(s) have been installed, the removed turfs and soil from the LWS (stored separately to that of adjacent fields) will be backfilled and replaced promptly, retaining the original topsoil and seed bank. Hedgerows would be retained and appropriate measures (e.g., fencing and signage) will ensure no encroachment into the LWSs, outside of the required working areas.

Vegetation clearance will be required for provision of the new and modified existing access tracks across the LWSs. The replacement of the hedgerows and retention of the verge turfs relating to this work has been included within the landscape design (as presented in the **Framework LEMP [EN010143/APP/7.14]**).

Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] states that where temporary habitat loss is unavoidable, reinstatement will be undertaken after construction where practicable. Large areas of grassland creation is included within the landscape design throughout the Solar PV Areas, both around the solar PV panels and in

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Paragraph 5.3.14

Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Once lost it cannot be recreated. The IPC should not grant development consent for any development that would result in its loss or deterioration unless the benefits (including need) of the development, in that location outweigh the loss of the woodland habitat. Aged or 'veteran' trees found outside ancient woodland are also particularly valuable for biodiversity and their loss should be avoided. Where such trees would be affected by development proposals the applicant should set out proposals for their conservation or, where their loss is unavoidable, the reasons why.

the field margins of each field. These can be managed towards LWS criteria.

Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] concludes that there would be no significant adverse effects on local or regional biodiversity sites as a result of construction, operation or decommissioning of the Scheme.

Chapter 8: Ecology, ES Volume 1 [EN101043/APP/6.1] concludes that there would be no loss of ancient woodland, or veteran or ancient trees as a result of the Scheme.

As detailed in **Appendix 10-5: Arboricultural Impact Assessment and Tree Protection Report, ES Volume 2 [EN010143/APP/6.2]**, two veteran trees and one ancient tree are subject to an incursion into their Root Protection Area (RPA) or canopy spread. However these will be managed so that there will be no detrimental impacts on the health or amenity of these trees.

Chapter 8: Ecology, ES Volume 1 [EN101043/APP/6.1] also states that one ancient tree (T45) may require pruning to facilitate a temporary clearance for vehicular access. The final extent of pruning is to be agreed on site with an

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arboriculturist, but is not considered likely to result in a detrimental impact to the tree due to its species (crack willow) which is tolerant of pruning), good vitality and due to the existing clearance maintained over the existing hard surfaced access route.

As outlined in **Chapter 8: Ecology, ES Volume 1 [EN101043/APP/6.1]** the Scheme has been designed with the view to avoid key nature conservation and ecological features present within or adjacent to the Site as far as practicable. Accordingly, the following minimum buffers from key habitat features have been applied where practicable (e.g., some features such as hedgerows and waterbodies will be crossed):

- e. 15m from woodlands (some cabling will lie within 15m of woodland);
- f. 10m from hedgerows increasing to 15m where there are hedgerow trees;
- g. 15m from individual trees;

Paragraph 5.3.15

Development proposals provide many opportunities for building-in beneficial biodiversity or geological features as part of good design. When considering proposals, the IPC should maximise such opportunities in and around developments, using requirements or planning obligations where appropriate.

The Scheme has built in opportunities for maximising and enhancing biodiversity. These are set out in detail in the **Framework LEMP [EN010143/APP/7.14]**.

The Applicant is committed to exceeding the Government's 10% target for biodiversity net gain as set out in the Environment Act 2021. A

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Paragraph 5.3.16	Many individual wildlife species receive statutory protection under a range of legislative provisions.	<p>Biodiversity Net Gain (BNG) report [EN010143/APP/6.2], Natural England’s Biodiversity Metric 4.0, has been produced for the DCO Application. This report demonstrates that the Scheme has the potential to deliver significant biodiversity net gain on the Site, with 80% gain predicted for habitat biodiversity units.</p>
Paragraph 5.3.17	<p>Other species and habitats have been identified as being of principal importance for the conservation of biodiversity in England and Wales and thereby requiring conservation action. The IPC should ensure that these species and habitats are protected from the adverse effects of development by using requirements or planning obligations. The IPC should refuse consent where harm to the habitats or species and their habitats would result, unless the benefits (including need) of the development outweigh that harm. In this context the IPC should give substantial weight to any such harm to the detriment of biodiversity features of national or regional importance which it considers may result from a proposed development.</p>	<p>Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] considers protected and notable species where appropriate, as part of the assessment, and mitigation measures which have been embedded into the Scheme to avoid or reduce potential effects. These are also set out in the Framework CEMP [EN010143/APP/7.7].</p> <p>Section 8.8 and 8.9 of Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] and the HRA [EN010143/APP/7.12] concludes that the Scheme has the potential to result in the loss of arable land that is functionally linked to the Lower Derwent Valley SPA/Ramsar and Humber Estuary SPA/Ramsar, with abundances of qualifying species (i.e., golden plover and pink-footed goose), reaching or approaching the 1% population threshold.</p> <p>Therefore, mitigation will be delivered to offset the permanent loss of supporting habitat for golden plover and pink-footed goose under the</p>

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operational footprint of the Scheme. Overall, given the adequate mitigation framework that is in place, it is concluded that the Scheme would not result in any significant adverse effects on these species.

Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] concludes that with the implementation of the proposed embedded mitigation, the assessment of effects on the remaining important ecological features, species and habitats set out in **Table 8-12 of Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1]** the construction, operation and decommissioning phases of the Scheme is unlikely to result in significant adverse effects.

Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] reports that there would be beneficial effects to semi-improved neutral grassland, terrestrial invertebrates, bats, reptiles, and other mammals (hedgehogs, brown hare, harvest mouse and polecat, and common amphibians, as a result of the operational phase of the Scheme.

The Applicant committed to exceeding the Government's 10% target for biodiversity net gain as set out in the Environment Act 2021. A **Biodiversity Net Gain (BNG) report [EN010143/APP/6.2]**, Natural England's Biodiversity Metric 4.0, has been produced for the

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Paragraph 5.3.18	<p>The applicant should include appropriate mitigation measures as an integral part of the proposed development. In particular, the applicant should demonstrate that:</p> <ul style="list-style-type: none">• during construction, they will seek to ensure that activities will be confined to the minimum areas required for the works;• 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; and• opportunities will be taken to enhance existing habitats and, where practicable, to create new habitats of value within the site landscaping proposals	<p>DCO Application. This report demonstrates that the Scheme has the potential to deliver significant biodiversity net gain on the Site, with 80% gain predicted for habitat biodiversity units.</p> <p>Embedded design mitigation measures such as those set out in this policy are outlined in Section 8.6 of Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] and are illustrated within the Framework CEMP [EN010143/APP/7.7], Framework OEMP [EN010143/APP/7.8] and Framework DEMP [EN/010143/APP/7.9]. These include, but are not limited to, siting construction routes away from and out of designated sites where practicable, incorporating suitable buffer zones and erection of temporary construction fencing to avoid incursion into exclusion zones.</p> <p>Production of a final CEMP, OEMP and DEMP will be secured by the DCO. The Framework CEMP [EN010143/APP/7.7] includes best practice measures to ensure that activities will be confined to the minimum areas required for the works during construction, in accordance with this part of the policy.</p> <p>Section 8.9 of Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] outlines mitigation measures pertaining to habitat avoidance, creation and</p>

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Paragraph 5.3.20

The IPC will need to take account of what mitigation measures may have been agreed between the applicant and Natural England (or the Countryside Council for Wales) or the Marine Management Organisation (MMO), and whether Natural England (or the Countryside Council for Wales) or the MMO has granted or refused or intends to grant or refuse, any relevant licences, including protected species mitigation licences.

replacement measures that comply with this part of the policy.

Chapter 8: Ecology of the ES
[EN010118/APP/6.1] concludes that the Scheme design has embedded sufficient mitigation to avoid significant adverse effects to important ecological features, without additional mitigation measures being required. No protected species licences are expected to be needed.

The scope and extent of HRA have been determined by a combination of the Scoping Opinion adopted by the Planning Inspectorate on behalf of the Secretary of State, ongoing engagement with consultees such as Natural England (NE), and professional judgement. The HRA is also in accordance with PINS's Advice Note Ten: Habitats Regulations Assessment relevant to nationally significant infrastructure projects.

The Grid Connection Corridor crosses the River Ouse at a point where it is tidal and therefore falls under the remit of the MMO. A deemed Marine Licence for these works is sought as part of the DCO Application.

The crossing of the River Ouse will be via horizontal directional drill (HDD) with no direct

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Civil and Military aviation and defence interest		
Paragraph 5.4.10	Where the proposed development may have an effect on civil or military aviation and/or other defence assets an assessment of potential effects should be set out in the ES.	This is taken account in the glint and glare assessment, and a summary is presented in Chapter 16: Other Environmental Topics ES Volume 1 [EN010143/APP/6.1]
Paragraph 5.4.11	The applicant should consult the MoD, 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 or other defence interests.	There are 14 aerodromes within 30km of the Solar PV Site. However, only Brighton Airfield and Leeds East Airport required a detailed assessment as the Solar PV Site is located within their safeguarding buffer zone. The Applicant consulted with the MoD, CAA, NATS, Brighton Airfield, Doncaster Sheffield Airport Limited, and York Flying School during the statutory consultation for the Scheme.
Paragraph 5.4.12	Any assessment of aviation or other defence interests should include potential impacts of the project upon the operation of CNS infrastructure, flight patterns (both civil and military), other defence assets and aerodrome operational procedures. It should also assess the cumulative effects of the project with other relevant projects in relation to aviation and defence.	Chapter 16: Other environmental topics, ES Volume 1 [EN010143/APP/6.1] provides as assessment of glint and glare on aviation or defence interests. It states that four runway approach paths and one air traffic control tower were assessed in detail at Brighton Airfield. Only ‘Green Glare’ impacts (which is where there is a low potential for an ‘after image’) were predicted for Runway 28 at Brighton Airfield, which is an

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		<p>acceptable impact upon runways according to FAA guidance. The other receptors experience no impact. Chapter 16: Other environmental topics, ES Volume 1 [EN010143/APP/6.1] concludes that overall aviation impacts are low and not significant.</p> <p>In addition, it sets out that following a review of the shortlisted cumulative developments presented in Appendix 5-1, ES Volume 2 [EN010143/APP/6.2] there are no other solar developments located within 2 km of the Solar PV Site to cause any potential cumulative effects, based on each having a maximum 1 km area of influence.</p>
Paragraph 5.4.13	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 and defence consultees are informed as soon as reasonably possible.	Consultation has been undertaken throughout and the consultees notified when relevant design changes were made. Further detail is contained within the Consultation Report [EN010143/APP/5.1] .
Paragraph 5.4.14	The [Secretary of State] should be satisfied that the effects on civil and military aerodromes, aviation technical sites and other defence assets have been addressed by the applicant and that any necessary assessment of the proposal on aviation or defence interests has been carried out. In particular, it should be satisfied that the proposal has been designed to minimise adverse impacts on the operation and safety of aerodromes and that reasonable mitigation is carried out. It may also be appropriate to expect operators of the aerodrome to consider making reasonable changes	This is taken account in the glint and glare assessment, and a summary is presented in Chapter 16: Other Environmental Topics ES Volume 1 [EN010143/APP/6.1] .

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	<p>to operational procedures. When assessing the necessity, acceptability and reasonableness of operational changes to aerodromes, the [Secretary of State] should satisfy itself that it has the necessary information regarding the operational procedures along with any demonstrable risks or harm of such changes, taking into account the cases put forward by all parties. When making such a judgement in the case of military aerodromes, the [Secretary of State] should have regard to interests of defence and national security.</p>	
<p>Dust, Odour, Artificial Light, Smoke, Steam and Insect Infestation</p>		
<p>Paragraph 5.6.4</p>	<p>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 Environmental Statement.</p>	<p>A dust risk assessment has been undertaken and can be found in Chapter 16, Other Environmental Topics, ES Volume 1 [EN010143/APP/6.1]. The dust risk assessment concludes that there is a high risk for dust impacts during construction, however with the implementation of best practice and environmental management measures the effects relating to dust from construction and decommissioning phases of the Scheme will be negligible and not significant.</p>
<p>Paragraph 5.6.5</p>	<p>In particular, the assessment provided by the applicant should describe:</p> <ul style="list-style-type: none"> • 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; and 	<p>Artificial lighting may be required during construction and decommissioning in areas where natural lighting is unable to reach (sheltered/confined areas), and during core working hours within winter months. All construction lighting will be deployed in</p>

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- measures to be employed in preventing or mitigating the emissions

accordance with the recommendations set out in the **Framework CEMP [EN010143/APP/7.7]**.

Chapter 2: The Scheme, ES Volume 1 [EN010143/APP/6.1] states that construction works will generally be limited to daylight hours only, with focussed task specific lighting provided where this is not practicable, for example unless directed by authorities or areas requiring road closures or at the HDD locations requiring night-time working.

Lighting will be directional with care to minimise potential for light spillage beyond the Site particularly towards houses, live traffic, and habitats. Lights installed will be of the minimum brightness and/or power rating capable of performing the desired function. Light fittings will be used that reduce the amount of light emitted above the horizontal (reduce upward lighting). Light fittings will be positioned correctly, inward facing and directed downwards. Passive Infra-Red (PIR) controlled lights (motion sensors) will be used except where temporary focussed task specific lighting is required.

The Scheme is not expected to result in an increased risk of insect infestation and will not emit any odour. Construction and decommissioning activities will not include burning materials (as set out in the **Framework CEMP**

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[EN010143/APP/7.7]. For these reasons, smoke, odour and insect infestation risk have not been assessed in the ES.

Flood Risk

Paragraph 5.7.2

Climate change over the next few decades is likely to mean milder, wetter winters and hotter, drier summers in the UK, while sea levels will continue to rise. Within the lifetime of energy projects, these factors will lead to increased flood risks in areas susceptible to flooding, and to an increased risk of the occurrence of floods in some areas which are not currently thought of as being at risk. The applicant and the IPC should take account of the policy on climate change adaptation in Section 4.8.

The ES for the Scheme includes a **Flood Risk Assessment (FRA) Appendix 9-3, ES Volume 2 [EN01043/APP/6.2]** which takes into account climate change, the findings of which are summarised in the ES in EIA terms. Further information is provided in **Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 [EN010143/APP/6.1]**. Along with **Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1]**, these set out measures the Scheme has taken to be resilient and adapt to climate change.

Paragraph 5.7.3

The aims of planning policy on development and flood risk are to ensure that flood risk from all sources of flooding is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas at highest risk. Where new energy infrastructure is, exceptionally, necessary in such areas, policy aims to make it safe without increasing flood risk elsewhere and, where possible, by reducing flood risk overall.

The ES for the Scheme includes a **Flood Risk Assessment (FRA) Appendix 9-3, ES Volume 2 [EN01043/APP/6.2]**, the findings of which will be summarised in the ES in EIA terms. Further information is provided in **Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 [EN010143/APP/6.1]**

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Paragraph 5.7.4	Applications for energy projects of 1 hectare or greater in Flood Zone 1 in England or Zone A in Wales and all proposals for energy projects located in Flood Zones 2 and 3 in England or Zones B and C in Wales should be accompanied by a flood risk assessment (FRA). An FRA will also be required where an energy project less than 1 hectare may be subject to sources of flooding other than rivers and the sea (for example surface water), or where the EA, Internal Drainage Board or other body have indicated that there may be drainage problems. This should identify and assess the risks of all forms of flooding to and from the project and demonstrate how these flood risks will be managed, taking climate change into account.	A Flood Risk Assessment (FRA) is provided at Appendix 9-3, ES Volume 2 [EN01043/APP/6.2] . The FRA provides a detailed assessment of the risk of flooding to and from the Scheme (taking account of climate change) and concludes that the risk of flooding will not be increased as a result of the construction, operation or decommissioning of the Scheme. The FRA meets all the requirements set out within paragraph 5.7.5.
Paragraph 5.7.5	The minimum requirements for FRAs are that they should: <ul data-bbox="465 858 1317 1370" style="list-style-type: none">• 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, 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	

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other artificial features, together with the consequences of their failure;

- consider the vulnerability of those using the site, including arrangements for safe access;
- consider and quantify the different types of flooding (whether from natural and human sources and including joint and cumulative effects) and identify flood risk reduction measures, so that assessments are fit for the purpose of the decisions being made;
- consider the effects of a range of flooding events including extreme events on people, property, the natural and historic environment and river and coastal processes;
- include the assessment of the remaining (known as 'residual') risk after risk reduction measures have been taken into account and demonstrate that this is acceptable for the particular project;
- 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;
- consider if there is a need to be safe and remain operational during a worst case flood event over the development's lifetime; and
- be supported by appropriate data

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
Paragraph 5.7.7	Applicants for projects which may be affected by, or may add to, flood risk should arrange pre-application discussions with the EA, and, where relevant, other bodies such as Internal Drainage Boards, sewerage undertakers, navigation authorities, highways authorities and reservoir owners and operators. 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 IPC to reach a decision on the application when it is submitted. The IPC should advise applicants to undertake these steps where they appear necessary, but have not yet been addressed.	A FRA is provided at Appendix 9-3, ES Volume 2 [EN01043/APP/6.2] . The preparation of the FRA, and the ES has taken account of advice and consultation with key bodies, including the Environment Agency and Lead Local Flood Authorities (LLFAs). The following statutory consultees listed below have provided comment on flood risk and drainage: <ul style="list-style-type: none">a. East Riding of Yorkshire Council (LLFA);b. North Yorkshire Council (LLFA);c. Yorkshire Water;d. Canal and Rivers Trust;e. The Selby Area Internal Drainage Board;f. Yorkshire and Humber Drainage Boards;g. Ouse and Humber Drainage Boards; andh. The Environment Agency.
Paragraph 5.7.8	If the EA has concerns about the proposal on flood risk grounds, the applicant should discuss these concerns with the EA and take all reasonable steps to agree ways in which the proposal might be amended, or additional information provided, which would satisfy the Environment Agency's concerns.	
		Details of the consultation undertaken with regard to flood risk is set out in the Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 [EN010143/APP/6.1] and the Consultation Report [EN010143/APP/5.1] .

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Paragraph 5.7.9	<p>In determining an application for development consent, the IPC should be satisfied that where relevant:</p> <ul style="list-style-type: none"> the application is supported by an appropriate FRA; the Sequential Test has been applied as part of site selection; a sequential approach has been applied at the site level to minimise risk by directing the most vulnerable uses to areas of lowest flood risk; the proposal is in line with any relevant national and local flood risk management strategy; priority has been given to the use of sustainable drainage systems (SuDs) (as required in the next paragraph on National Standards); and in flood risk areas the project is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed over the lifetime of the development. 	<p>A FRA is provided at Appendix 9-3, ES Volume 2 [EN01043/APP/6.2]. This demonstrates how the development passes the Sequential Test including its application at the site level.</p> <p>The majority of the Solar PV Site is located within Flood Zone 1 (lowest risk of fluvial flooding). However, the Solar PV Site also includes Solar PV Areas wholly within Flood Zone 2 (medium risk of fluvial flooding) and limited areas of Flood Zone 3 (high risk). There are small areas of ground water flooding susceptibility and surface water flooding risk also within the Solar PV Site. Given the risk of flooding within the Solar PV Site, the Sequential Test is required to be demonstrated.</p> <p>The Sequential Test Report appended to the FRA [EN010143/APP/6.2], sets out the assessment undertaken as part of the Sequential Test. It concludes that it is considered that no alternative sites are considered appropriate or reasonably available for the Scheme. Therefore, the Scheme satisfies the Sequential Test.</p> <p>The majority of the Grid Connection Corridor is located within high and medium risk of fluvial flooding (Flood zone 2 and 3). As set out in Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1], the majority of the land around the point of connection is flood zone 2 or 3 and as such there are no reasonable</p>

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alternative routes for the Grid Connection Corridor outside of Flood Zone 2 and 3. Because of this, and the small number of solar PV infrastructure also proposed in Flood Zone 3, it is therefore necessary to apply the Exception Test.

The Scheme will provide wider sustainability benefits by contributing to energy security, affordability and helping to achieve the government targets for Net Zero, which outweigh flood risk, and appropriate mitigation has been considered to ensure that the Scheme remains operational and is safe during times of flooding. It has therefore been demonstrated that the Exception Test has been met.

The risk of surface water flooding to the majority of the Solar PV Site and Interconnecting Cable Corridor is considered to be 'very low'. There are a few areas where the risk is higher but these generally cover a small spatial extent. A **Framework Surface Water Drainage Strategy Appendix 9-4, ES Volume 2 [EN010143/APP/6.2]** incorporating SuDS has been prepared to manage these flow paths to ensure that the development remains safe throughout its lifetime.

The FRA details embedded mitigation measures alongside the **Framework Surface Water Drainage Strategy, Appendix 9-4 of Chapter 9: Flood Risk, Drainage and Water Environment,**

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Paragraph 5.7.10	<p>For construction work which has drainage implications, approval for the project's drainage system will form part of the development consent issued by the IPC. The IPC 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. In addition, the development consent order, or any associated planning obligations, will need to make provision for the adoption and maintenance of any SuDS, including any necessary access rights to property. The IPC 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. The responsible body could include, for example, the applicant, the landowner, the relevant local authority, or another body, such as an Internal Drainage Board</p>	<p>ES Volume 2 [EN010143/APP/6.2], to ensure that the project is appropriately flood resilient and resistant. The Framework CEMP [EN010143/APP/7.7] includes measures such as safe access and escape routes where required and ensures that any residual risk can be safely managed over the lifetime of the development.</p> <p>Chapter 9: Flood Risk, Drainage and Surface Water, ES Volume 1 [EN010143/APP/6.1] presents the assessment of the likely significant effects on surface water bodies (e.g. rivers, streams, ditches, canals, lakes and ponds) including water quality and hydromorphology, flood risk and drainage.</p> <p>The Framework Surface Water Drainage Strategy, Appendix 9-4, ES Volume 2 [EN010143/APP/6.2] sets out the proposed strategy for surface water and drainage, which will be secured by requirements of the DCO. Mitigation measures such as the use of localised SuDS, such as swales and infiltration trenches, will be used to control runoff if required.</p> <p>It is predicted at this stage that there would be a negligible impact to any receiving water feature from surface water runoff.</p>
Paragraph 5.7.12	<p>The IPC should not consent development in Flood Zone 2 in England or Zone B in Wales unless it is satisfied that the</p>	<p>The FRA [EN010143/APP/6.2], and Sequential Test Report (Annex to FRA) demonstrates that</p>

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	<p>sequential test requirements have been met. It should not consent development in Flood Zone 3 or Zone C unless it is satisfied that the Sequential and Exception Test requirements have been met. 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, but should apply the sequential approach to locating development within the site</p>	<p>the Sequential Test has been met for the Solar PV Site, which is predominantly located in Flood Zone 1, with small parts located in Flood Zone 2 and 3. It also demonstrates that the Sequential and Exception Tests are met for the Grid Connection Corridor and part of the Solar PV Site, which is located within Flood Zone 3.</p>
<p>Paragraph 5.7.13</p>	<p>Preference should be given to locating projects in Flood Zone 1 in England or Zone A in Wales. If there is no reasonably available site in Flood Zone 1 or Zone A, then projects can be located in Flood Zone 2 or Zone B. If there is no reasonably available site in Flood Zones 1 or 2 or Zones A & B, then nationally significant energy infrastructure projects can be located in Flood Zone 3 or Zone C subject to the Exception Test. Consideration of alternative sites should take account of the policy on alternatives set out in Section 4.4 above</p>	<p>As set out in Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1], the majority of the land around the point of connection is Flood Zone 2 or 3 and as such there are no reasonable alternative routes for the Grid Connection Corridor outside of Flood Zone 2 and 3. Because of this, and some minor parts of Solar PV infrastructure also proposed in Flood Zone 3, it is therefore necessary to apply the Exception Test.</p>
<p>Paragraph 5.7.14</p>	<p>If, following application of the sequential test, it is not possible, consistent with wider sustainability objectives, for the project to be located in zones of lower probability of flooding than Flood Zone 3 or Zone C, the Exception Test can be applied. The test provides a method of managing</p>	<p>The Scheme will provide wider sustainability benefits by contributing to energy security, affordability and helping to achieve the government targets for Net Zero, which outweigh flood risk, and appropriate mitigation has been considered to ensure that the Scheme remains operational and</p>

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
	flood risk while still allowing necessary development to occur	is safe during times of flooding. It has therefore been demonstrated that the Exception Test has been met.
Paragraph 5.7.15	The Exception Test is only appropriate for use where the sequential test alone cannot deliver an acceptable site, taking into account the need for energy infrastructure to remain operational during floods. It may also be appropriate to use it where as a result of the alternative site(s) at lower risk of flooding being subject to national designations such as landscape, heritage and nature conservation designations, for example Areas of Outstanding Natural Beauty (AONBs), Sites of Special Scientific Interest (SSSIs) and World Heritage Sites (WHS) it would not be appropriate to require the development to be located on the alternative site(s).	
Paragraph 5.7.16	<p>All three elements of the test will have to be passed for development to be consented. For the Exception Test to be passed:</p> <p>it must be demonstrated that the project provides wider sustainability benefits to the community that outweigh flood risk;</p> <p>the project should be on developable, previously developed land or, if it is not on previously developed land, that there are no reasonable alternative sites on developable previously developed land subject to any exceptions set out in the technology-specific NPSs; and</p>	

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
Paragraph 5.7.17	<p>a FRA must demonstrate that the project will be safe, without increasing flood risk elsewhere subject to the exception below and, where possible, will reduce flood risk overall.</p> <p>Exceptionally, where an increase in flood risk elsewhere cannot be avoided or wholly mitigated, the IPC may grant consent if it is satisfied that the increase in present and future flood risk can be mitigated to an acceptable 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 IPC should make clear how, in reaching its decision, it has 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 and other relevant bodies.</p>	<p>Chapter 9: Flood Risk, Drainage and Surface Water, ES Volume 1 [EN010143/APP/6.1] presents the assessment of the likely significant effects on surface water bodies (e.g. rivers, streams, ditches, canals, lakes and ponds) including water quality and hydromorphology, flood risk and drainage. The chapter concludes that the Scheme will remain safe throughout its lifetime and will not increase the risk of flooding elsewhere and will be resilient to flooding with the implementation of mitigation measures secured via requirements.</p> <p>The FRA details embedded mitigation measures alongside the Framework Surface Water Drainage Strategy, Appendix 9-4 of Chapter 9: ES Volume 2 [EN010143/APP/6.2] which will inform a detailed Surface Water Drainage Strategy, which will be secured by the DCO, and sets out how these will be implemented during the construction, operation or decommissioning phases.</p>
Paragraph 5.7.18	<p>To satisfactorily manage flood risk, arrangements are required to manage surface water and the impact of the natural water cycle on people and property</p>	<p>Chapter 9: Flood Risk, Drainage and Surface Water, ES Volume 1 [EN010143/APP/6.1] presents the assessment of the likely significant</p>

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
Paragraph 5.7.19	<p>In this NPS, the term Sustainable Drainage Systems (SuDS) refers to the whole range of sustainable approaches to surface water drainage management including, where appropriate:</p> <ul style="list-style-type: none"> • 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; and • flood routes to carry and direct excess water through developments to minimise the impact of severe rainfall flooding 	<p>effects on surface water bodies (e.g. rivers, streams, ditches, canals, lakes and ponds) including water quality and hydromorphology, flood risk and drainage.</p> <p>It concludes that there would not be any significant effects relating to surface water flooding as a result of the construction, operation or decommissioning of the Scheme. The Framework Surface Water Drainage Strategy, Appendix 9-4, ES Volume 2 [EN010143/APP/6.2] sets out the proposed strategy for surface water and drainage, which will be secured by requirements of the DCO. Mitigation measures such as the use of localised SuDS, such as swales and infiltration trenches, will be used to control runoff if required.</p> <p>The Scheme would be constructed, operated and decommissioned using best practice and comply with environmental legislation through the application of an CEMP, OEMP, and DEMP which will be secured by the DCO, including appropriate use and maintenance of SuDS and other drainage infrastructure.</p>
Paragraph 5.7.20	<p>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.</p>	

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
Paragraph 5.7.21	The surface water drainage arrangements for any project should be such that the volumes and peak flow rates of surface water leaving the site are no greater than the rates prior to the proposed project, unless specific off-site arrangements are made and result in the same net effect.	The Framework Surface Water Drainage Strategy, Appendix 9-4 of Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 2 [EN010143/APP/6.2] sets out the strategy for surface water and drainage, and will be secured by requirements of the DCO. This
Paragraph 5.7.22	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.	states that states that the proposed surface water drainage network has been designed to accommodate runoff from all storms up to and including the 1% AEP +40% for climate change.
Paragraph 5.7.23	The sequential approach should be applied to the layout and design of the project. More vulnerable uses should be located on parts of the site at lower probability 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.	The layout of the Scheme has been shaped by the need to minimise development in the limited areas of the land around watercourses that have a higher risk of flooding. Opportunities to utilise areas of higher flood risk for other purposes, such as ecology mitigation, have been taken in the design of the layout, landscaping and biodiversity mitigation. This is set out in the Design and Access Statement [EN010143/APP/7.3] . The Framework Surface Water Drainage Strategy, Appendix 9-4, ES Volume 2 [EN010143/APP/6.2] sets out the proposed strategy for surface water and drainage, which will be secured by requirements of the DCO. Mitigation measures such as the use of localised

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Detail**

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Paragraph 5.7.24

Essential energy infrastructure which has to be located in flood risk areas should be designed to remain operational when floods occur. In addition, any energy projects proposed in Flood Zone 3b the Functional Floodplain (where water has to flow or be stored in times of flood), or Zone C2 in Wales, should only be permitted if the development will not result in a net loss of floodplain storage, and will not impede water flows.

SuDS, such as swales and infiltration trenches, will be used to control runoff if required.

Detailed information on Scheme design and infrastructure is provided in **Chapter 2: The Scheme, ES Volume 1 [EN010143/APP/6.1]**.

The Scheme has undertaken a sequential approach to its location and design. This has involved locating the majority of the Order limits within Flood Zone 1 where practicable. The majority of the solar PV panels and vulnerable electrical components in the Solar PV Area are located outside of Flood Zone 3. However, where solar PV panels and Field Stations are located within Flood Zone 3 and 2, the tilt range of tracker panels will be restricted to ensure that a 300 mm freeboard above the modelled design flood event is maintained at all times regardless of whether there is a flood event occurring or not.

The Scheme also ensures that panels can be remotely moved into their horizontal (night-time storage position) of 2.3 m above ground level if increasing water levels are observed or if a flood warning is received, increasing their resiliency.

The Scheme compensates for the approximate 150 m³ of floodplain volume lost as a result of the

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
Paragraph 5.7.25	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. The applicant should take advice from the emergency services 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.	<p>Scheme, with flood compensation proposed along the edge of Flood Zone 3.</p> <p>The Grid Connection Corridor cable will be buried below ground, inherently flood protected, and protected by existing flood defences; it will therefore remain operational during times of flood.</p> <p>Further details of how the Scheme has mitigated against flood risk, and how the development will not result in a net loss of floodplain storage or impede water flows is set out in Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 [EN010143/APP/6.1].</p>
Historic Environment		
Paragraph 5.8.1	The construction, operation and decommissioning of energy infrastructure has the potential to result in adverse impacts on the historic environment.	An assessment of potential impacts at these stages of the Scheme is made within section 7.7

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
Paragraph 5.8.2	<p>The historic environment includes all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, landscaped and planted or managed flora. Those elements of the historic environment that hold value to this and future generations because of their historic, archaeological, architectural or artistic interest are called “heritage assets”. A heritage asset may be any building, monument, site, place, area or landscape, or any combination of these. The sum of the heritage interests that a heritage asset holds is referred to as its significance.</p>	<p>and 7.9 of Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1].</p> <p>An assessment of the value (heritage significance) of heritage assets, including contribution made by setting, is included in section 7.5 and section 7.7 of Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1].</p> <p>Data sources are stated in section 7.4 of Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] and include the relevant local authority Historic Environment Record.</p>
Paragraph 5.8.3	<p>Some heritage assets have a level of significance that justifies official designation. Categories of designated heritage assets are: a World Heritage Site; Scheduled Monument; Protected Wreck Site; Protected Military Remains, Listed Building; Registered Park and Garden; Registered Battlefield; Conservation Area; and Registered Historic Landscape (Wales only)</p>	<p>A desk-based assessment is presented in Appendix 7-2: Cultural Heritage Desk-based Assessment, ES Volume 2 [EN010143/APP/6.2] which identifies relevant designated heritage assets within the Site and wider Study Areas using information from the Historic Environment Record and National Heritage List for England (NHLE).</p>
Paragraph 5.8.4	<p>There are heritage assets with archaeological interest that are not currently designated as scheduled monuments, but which are demonstrably of equivalent significance. These include: those that have yet to be formally assessed for designation;</p>	<p>An assessment of the value (heritage significance) of heritage assets, including contribution made by setting, is included in section 7.5 and section 7.7 of Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1].</p>

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
	<p>those that have been assessed as being designated but which the Secretary of State has decided not to designate; and</p> <p>those that are incapable of being designated by virtue of being outside the scope of the Ancient Monuments and Archaeological Areas Act 1979.</p>	<p>Data sources are stated in section 7.4 of Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] and include the relevant local authority Historic Environment Record. This concludes that a non designated heritage asset of schedulable quality; Hagthorpe moated site (MNY10603), is located approximately 2.4km west of the Solar PV Site, within the Grid Connection Corridor. This asset has been subject to the same policy considerations as those that apply to designated heritage assets.</p> <p>The Heritage Statement (Appendix C of the Planning Statement [EN010143/APP/7.2]) submitted with this Application assesses the harm on this asset alongside designated heritage assets.</p>
<p>Paragraph 5.8.5</p>	<p>The absence of designation for such heritage assets does not indicate lower significance. If the evidence before the Infrastructure Planning Commission (IPC) 1 indicates to it that a non-designated heritage asset of the type described in 5.8.4 may be affected by the proposed development then the heritage asset should be considered subject to the same policy considerations as those that apply to designated heritage assets.</p>	<p>An assessment of the value (heritage significance) of heritage assets, including contribution made by setting, is included in section 7.5 and section 7.7 of Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1].</p> <p>Data sources are stated in section 7.5 of Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] and include the relevant local authority Historic Environment Record. This concludes that a non designated heritage asset of schedulable quality; Hagthorpe moated site (MNY10603), is located approximately 2.4km west</p>

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Detail**

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Proposed Development compliance**

Paragraph 5.8.6

The IPC should also consider the impacts on other non-designated heritage assets, as identified either through the development plan making process (local listing) or through the IPC's decision making process on the basis of clear evidence that the assets have a heritage significance that merits consideration in its decisions, even though those assets are of lesser value than designated heritage assets.

of the Solar PV Site, within the Grid Connection Corridor. This asset has been subject to the same policy considerations as those that apply to designated heritage assets.

The **Heritage Statement (Appendix C of the Planning Statement [EN010143/APP/7.2])** submitted with this Application assesses the harm on this asset alongside designated heritage assets.

An assessment of potential impacts resulting from the proposed development is made within section 7.7 of **Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1]**. This provides an assessment of impacts on non-designated heritage assets.

Evaluation fieldwork surveys have been undertaken to allow the Applicant to enhance the baseline understanding of cultural heritage assets including their potential value. The results of the fieldwork surveys are included in the ES and the reports submitted with the DCO application and also, ultimately, lodged with the relevant local planning authority Historic Environment Record.

Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] concludes that the Scheme would result in significant effects to eight non-

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designated heritage assets. These comprise of Hagthorpe moated site, which is a non-designated asset of schedulable quality, the historic farmstead at Johnson’s Far, and six archaeological assets (six areas of Romano-British settlement archaeology). Therefore, additional mitigation in the form of a programme of archaeological excavation and recording is proposed, and will be set out in an Overarching Written Scheme of Investigation for Archaeological Mitigation.

It is acknowledged that while archaeological excavation and recording would not minimise the physical impact to these assets, as the archaeological evidence would still be removed, it would compensate for their loss by preserving them by record; thereby allowing their continued study and achieving greater understanding and appreciation of their heritage value. This would reduce the magnitude of impact on individual assets, resulting in a residual minor adverse effect, which is not significant.

Paragraph 5.8.8

As part of the ES (see Section 4.2) the applicant should provide a description of the significance of the heritage assets affected by the proposed development and the contribution of their setting to that significance. 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 the significance of

Section 7.5 of **Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1]** describes the designated and non-designated assets located in the study area around the Scheme (having considered the HER and through the Applicant’s own assessment) and their significance, and the contribution of their setting to that significance.

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
	<p>the heritage asset. As a minimum the applicant should have consulted the relevant Historic Environment Record (or, where the development is in English or Welsh waters, English Heritage or Cadw) and assessed the heritage assets themselves using expertise where necessary according to the proposed development’s impact.</p>	<p>Evaluation fieldwork surveys have been undertaken to allow the Applicant to enhance the baseline understanding of cultural heritage assets including their potential value. The results of the fieldwork surveys are included in the ES [EN010143/APP/6.1] and the reports submitted with the DCO application and also, ultimately, lodged with the relevant local planning authority Historic Environment Record.</p>
<p>Paragraph 5.8.9</p>	<p>Where a development site 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, representative visualisations may be necessary to explain the impact</p>	<p>Archaeological evaluations were undertaken in addition to a cultural heritage desk-based assessment, Appendix 7-2, ES Volume 2 [EN010143/APP/6.2], including a geophysical survey and report (detailed magnetometry), Appendix 7-3, ES Volume 2 [EN010143/APP/6.2], of the whole Scheme and targeted trial trenching.</p>
<p>Paragraph 5.8.10</p>	<p>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.</p>	<p>Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] sets out an assessment of the Scheme on Cultural Heritage, in accordance with this policy.</p>
<p>Paragraph 5.8.11</p>	<p>In considering applications, the IPC 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:</p>	<p>An assessment of the value (heritage significance) of heritage assets, including contribution made by setting, is included in section 7.5 and section 7.7 of Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1].</p>

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
	<p>evidence provided with the application; any designation records; the Historic Environment Record, and similar sources of information; the heritage assets themselves; the outcome of consultations with interested parties; and where appropriate and when the need to understand the significance of the heritage asset demands it, expert advice.</p>	<p>Data sources are stated in section 7.4 of Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] and include the relevant local authority Historic Environment Record.</p> <p>Evaluation fieldwork surveys have been undertaken to allow the Applicant to enhance the baseline understanding of cultural heritage assets including their potential value. The results of the fieldwork surveys are included in the ES [EN010143/APP/6.1] and the reports submitted with the DCO application and also, ultimately, lodged with the relevant local planning authority Historic Environment Record.</p>
<p>Paragraph 5.8.12</p>	<p>In considering the impact of a proposed development on any heritage assets, the IPC should take into account 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 conservation of that significance and proposals for development</p>	<p>An assessment of the value (heritage significance) of heritage assets, including contribution made by setting, is included in section 7.5 of Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1].</p> <p>Data sources are stated in section 7.5 of Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] and include the relevant local authority Historic Environment Record.</p> <p>Impacts to designated heritage assets have been avoided through design, as set out in section 7.6 of Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1].</p>

**NPS EN-1
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**NPS EN-1
Detail**

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Paragraph 5.8.13

The IPC should take into account the desirability of sustaining and, where appropriate, enhancing the significance of heritage assets, the contribution to their settings and the positive contribution they can make to sustainable communities and economic vitality. The IPC should take into account the desirability of new development making a positive contribution to the character and local distinctiveness of the historic environment. The consideration of design should include scale, height, massing, alignment, materials and use. The IPC should have regard to any relevant local authority development plans or local impact report on the proposed development in respect of the factors set out in footnote 122.

Evaluation fieldwork surveys have been undertaken to allow the Applicant to enhance the baseline understanding of cultural heritage assets including their potential value. The results of the fieldwork surveys are included in the ES and the reports submitted with the DCO application and also, ultimately, with the relevant local planning authority Historic Environment Record.

Section 7.6 of **Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1]** outlines the avoidance and mitigation measures embedded within the Scheme design in relation to cultural heritage.

It sets out that physical impacts to known heritage assets within the Order limits have been avoided by the Scheme design, where practicable. This includes the avoidance of the moated site east of Gribthorpe (MHU3206), a non designated heritage asset.

The planning of construction and decommissioning traffic routes and modes of transport have sought to reduce impacts to numerous receptors, including the town of Howden.

The Order limits have been designed to avoid or minimise potential changes to the setting of

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designated heritage assets, including Grade I, Grade II* and Grade II listed buildings.

Mitigation also includes the careful siting of the construction compounds within the Solar PV Areas and the chosen colour palette for above-ground components, which will be green to reflect the prevailing landscape.

As set out in the **Framework LEMP [EN010143/APP/7.14]**, the Scheme would include management of existing woodland and hedgerows (including important hedgerows) to ensure historic boundaries are protected, whilst also increasing the level of screening from visual receptors.

Furthermore, the nature of the landscape, comprising many hedgerow boundaries and areas of tree planting, and restricted views of the land within the Order limits reduces the potential for heritage assets to experience change as a result of the Scheme's construction.

The Scheme has addressed local development plan policies relating to heritage assets in Appendix C of this **Planning Statement [EN010143/APP/7.2]**.

Paragraph 5.8.14

There should be a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage asset, the greater the

As set out **Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1]** and the **Heritage Statement (Appendix D of this Planning**

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
	<p>presumption in favour of its conservation should be. Once lost heritage assets cannot be replaced and their loss has a cultural, environmental, economic and social impact. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Loss affecting any designated heritage asset should require clear and convincing justification. Substantial harm to or loss of a grade II listed building park or garden should be exceptional. Substantial harm to or loss of designated assets of the highest significance, including Scheduled Monuments; registered battlefields; grade I and II* listed buildings; grade I and II* registered parks and gardens; and World Heritage Sites, should be wholly exceptional</p>	<p>Statement) the Scheme would not lead to any loss or substantial harm to any designated heritage assets.</p>
Paragraph 5.8.15	<p>Any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of development, recognising that the greater the harm to the significance of the heritage asset the greater the justification will be needed for any loss. Where the application will lead to substantial harm to or total loss of significance of a designated heritage asset the IPC should refuse consent unless it can be demonstrated that the substantial harm to or loss of significance is necessary in order to deliver substantial public benefits that outweigh that loss or harm.</p>	<p>Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] concludes that there will be no residual significant effect on designated heritage assets or their setting as a result of the Scheme. Embedded mitigation measures have reduced the effects on heritage assets and ensures preservation of those assets.</p> <p>The Heritage Statement (Appendix D of this Planning Statement) also concludes that the Scheme would not lead to any loss or substantial harm to any designated heritage assets.</p>
Paragraph 5.8.16	<p>Not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance. The policies set out in paragraphs 5.8.11 to 5.8.15 above apply to those elements that do contribute to the significance.</p>	<p>There are no World Heritage Sites affected by the Scheme.</p>

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
	<p>When considering proposals the IPC should take into account the relative significance of the element affected and its contribution to the significance of the World Heritage Site or Conservation Area as a whole.</p>	<p>Section 7.7 of Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] includes an assessment of Howden Conservation Area as part of the consideration of Howden Minster, including the kinetic experience of approaches to and from Howden, and those views which assist in appreciating the location of the town in its wider landscape setting. This detailed consideration concluded that the Solar PV Site did not form an identifiable, or important, element of the setting of the conservation area, and, as such, the presence of the operational Scheme would constitute no impact resulting in no effect.</p> <p>The Scheme therefore does not lead to significant adverse effects to a World Heritage Site or Conservation Area, in accordance with this policy.</p>
Paragraph 5.8.17	<p>Where loss of significance of any heritage asset is justified on the merits of the new development, the IPC should consider imposing a condition on the consent or requiring the applicant to enter into an obligation that will prevent the loss occurring until it is reasonably certain that the relevant part of the development is to proceed.</p>	<p>Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] concludes that the Scheme would result in significant effects to eight non-designated heritage assets. These comprise of Hagthorpe moated site, which is a non-designated asset of schedulable quality, the historic farmstead at Johnson's Far, and six archaeological assets (six areas of Romano-British settlement archaeology). Therefore, additional mitigation in the form of a programme of archaeological excavation and recording is proposed, and will be</p>

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
Paragraph 5.8.18	When considering applications for development affecting the setting of a designated heritage asset, the IPC should 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 IPC should weigh any negative effects 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	<p>set out in an Overarching Written Scheme of Investigation for Archaeological Mitigation.</p> <p>It is acknowledged that while archaeological excavation and recording would not minimise the physical impact to these assets, as the archaeological evidence would still be removed, it would compensate for their loss by preserving them by record; thereby allowing their continued study and achieving greater understanding and appreciation of their heritage value. This would reduce the magnitude of impact on individual assets, resulting in a residual minor adverse effect, which is not significant.</p> <p>The design of the Scheme preserves elements of the setting of designated assets that are important to their significance. There would be no significant effects on designated assets and very low magnitude of change to those assets experiencing minor adverse effects. See Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] for more detail.</p>
Paragraph 5.8.19	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 consent should be given.	Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] concludes that there will be no significant effect on designated heritage assets or their setting as a result of the Scheme.

**NPS EN-1
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**NPS EN-1
Detail**

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Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] concludes that the Scheme would result in significant effects to eight non-designated heritage assets. These comprise of Hagthorpe moated site, which is a non-designated asset of schedulable quality, the historic farmstead at Johnson's Far, and six archaeological assets (six areas of Romano-British settlement archaeology). Therefore, additional mitigation in the form of a programme of archaeological excavation and recording is proposed, and will be set out in an Overarching Written Scheme of Investigation for Archaeological Mitigation.

It is acknowledged that while archaeological excavation and recording would not minimise the physical impact to these assets, as the archaeological evidence would still be removed, it would compensate for their loss by preserving them by record; thereby allowing their continued study and achieving greater understanding and appreciation of their heritage value. This would reduce the magnitude of impact on individual assets, resulting in a residual minor adverse effect, which is not significant.

The effects above are outweighed by the very significant public benefits of the Scheme which are set out in section 5.3 of this **Planning Statement [EN010143/APP/7.2]**, when considered in isolation

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Paragraph 5.8.20

Where the loss of the whole or a material part of a heritage asset's significance is justified, the IPC should require the developer to record and advance understanding of the significance of the heritage asset before it is lost. The extent of the requirement should be proportionate to the nature and level of the asset's significance. Developers should be required to publish this evidence and deposit copies of the reports with the relevant Historic Environment Record. They should also be required to deposit the archive generated in a local museum or other public depository willing to receive it.

and cumulatively with other adverse effects of the Scheme.

Impacts to designated heritage assets have been avoided through design, as set out in section 7.6 of **Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1]**.

Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] concludes that the Scheme would result in significant effects to eight non-designated heritage assets. These comprise of Hagthorpe moated site, which is a non-designated asset of schedulable quality, the historic farmstead at Johnson's Far, and six archaeological assets (six areas of Romano-British settlement archaeology). Therefore, additional mitigation in the form of a programme of archaeological excavation and recording is proposed, and will be set out in an Overarching Written Scheme of Investigation for Archaeological Mitigation.

It is acknowledged that while archaeological excavation and recording would not minimise the physical impact to these assets, as the archaeological evidence would still be removed, it would compensate for their loss by preserving them by record; thereby allowing their continued study and achieving greater understanding and appreciation of their heritage value. This would reduce the magnitude of impact on individual

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
Paragraph 5.8.21	Where appropriate, the IPC should impose requirements on a consent that such work is carried out in a timely manner in accordance with a written scheme of investigation that meets the requirements of this Section and has been agreed in writing with the relevant Local Authority (where the development is in English waters, the Marine Management Organisation and English Heritage, or where it is in Welsh waters, the MMO and Cadw)) and that the completion of the exercise is properly secured.	assets, resulting in a residual minor adverse effect, which is not significant. A written scheme of investigation will be produced in order to fulfil any requirement that is imposed.
Paragraph 5.8.22	Where the IPC considers there to be a high probability that a development site may include as yet undiscovered heritage assets with archaeological interest, the IPC should consider requirements to ensure that appropriate procedures are in place for the identification and treatment of such assets discovered during construction.	This policy is noted.

Landscape and Visual

Paragraph 5.9.5	The applicant should carry out a landscape and visual assessment and report it in the ES. (See Section 4.2) A number of guides have been produced to assist in addressing landscape issues. 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	An assessment of the potential landscape and visual impacts associated with the construction, operation and decommissioning of the Scheme has been carried out and is presented in Chapter 10: Landscape and Visual Amenity, ES Volume 1 [EN010143/APP/6.1] . Chapter 10: Landscape and Visual Amenity, ES Volume 1 [EN010143/APP/6.1] outlines the
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NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
	<p>account of any relevant policies based on these assessments in local development documents in England and local development plans in Wales.</p>	<p>relevant landscape character assessments and related studies at national, regional, county and neighbourhood levels. Appendix 10-2 of the ES Volume 2 [EN010143/APP/6.2] sets out the relevant matters of these published assessments in detail. The landscape and visual impact assessment has taken account of relevant policies in local development documents.</p>
<p>Paragraph 5.9.6</p>	<p>The applicant’s assessment should include the effects during construction of the project and the effects of the completed development and its operation on landscape components and landscape character.</p>	<p>The assessment of the potential landscape and visual impacts includes an assessment of effects associated with the construction, operation and decommissioning of the Scheme. This is presented in Chapter 10: Landscape and Visual Amenity, ES Volume 1 [EN010143/APP/6.1].</p>
<p>Paragraph 5.9.7</p>	<p>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 local amenity, and nature conservation</p>	<p>The assessment contained in Chapter 10: Landscape and Visual Amenity, ES Volume 1 [EN010143/APP/6.1] includes the potential landscape and visual impacts associated with the construction, operation and decommissioning of the Scheme on local amenity and nature conservation. This includes an assessment of light pollution effects.</p> <p>However, it should be noted that the lighting proposed is minimal, particularly considering the scale of the Scheme, with the lighting designed to minimise impacts on local amenity and natural conservation.</p>

**NPS EN-1
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**NPS EN-1
Detail**

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During construction as far as is practicable, construction works will be limited to daylight hours only, with focussed task specific lighting provided where this is not practicable, for example at HDD locations where night time working is required. Within construction compounds and at welfare areas, etc, motion activated security lighting will be employed outside of core hours.

No visible lighting will be utilised at the Solar PV Site perimeter fence. Infrared (IR) lighting will be provided by the CCTV/security system to provide night vision functionality for CCTV. During operation, areas of solar PV will not require artificial lighting other than during temporary periods of maintenance/repair or in an emergency.

The lighting strategy is discussed in detail in **Chapter 2: The Scheme, ES Volume 1** and construction phase measures are further outlined in the Framework CEMP presented at **Appendix 2-1, ES Volume 2**.

Paragraph 5.9.8

Landscape effects depend on the existing character of the local landscape, its current quality, how highly it is valued and its capacity to accommodate change. All of these factors need to be considered in judging the impact of a project on landscape. Virtually all nationally significant energy infrastructure projects will have effects on the landscape. Projects need to be designed carefully, taking account of the potential impact on the landscape. Having

This policy recognises that virtually all NSIPs will have effects on the landscape and this is also the case for the Scheme. However, there are few impacts when taking into account the scale of the Scheme and its benefits.

Good design has been a key consideration from the outset. The LVIA has informed the iterative

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	<p>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</p>	<p>design process, which is set out in the Design and Access Statement [EN010143/APP/7.3]. The Scheme layout and design has been developed in response to policy requirements, published landscape character assessment guidance and fieldwork analysis. The design mitigation has been embedded in the Scheme to minimise effects on landscape character and visual amenity as shown in the Framework LEMP [EN010143/APP/7.14]. This will inform a detailed LEMP which will be secured through the DCO. The landscape design principles aim to achieve the following:</p> <ul style="list-style-type: none"> • Careful siting in the landscape • Conserving the existing vegetation patterns • Creating new green infrastructure • Sensitive Design in Relation to Form, Colour, and Materials • Sensitive Design of Lighting
<p>Paragraph 5.9.9</p>	<p>National Parks, the Broads and AONBs have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty. Each of these designated areas has specific statutory purposes which help ensure their continued protection and which the IPC should have regard to in its decision. The conservation of the natural beauty of the landscape and countryside should be given substantial weight by the IPC</p>	<p>There are no National Parks (or the Broads) or AONBs within or in close proximity to the Order limits.</p>

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	<p>in deciding on applications for development consent in these areas</p>	
<p>Paragraph 5.9.12</p>	<p>The duty to have regard to the purposes of nationally designated areas 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 compromising the purposes of designation and such projects should be designed sensitively given the various siting, operational, and other relevant constraints. This should include projects in England which may have impacts on National Scenic Areas in Scotland</p>	<p>Chapter 10: Landscape and Visual Amenity, ES Volume 1 [EN010143/APP/6.1] considers the Scheme’s impact on National Character Area (NCA) 39. It concludes that during operation at 1 year, the Scheme would result in the addition of man-made infrastructure that is energy related into an agricultural landscape. There will be a small reduction in the sense of remoteness and openness; however, the Solar PV Areas will not change the defining perceptual qualities within the character area NCA 39. New planting to replace vegetation lost during construction and mitigation planting will not yet be established. By operation year 15, the planting will have established repairing and strengthening the key characteristics of the character area improving the overall condition and structure of the landscape.</p> <p>It therefore concludes that there would be no significant effects to NCA 39, or any other nationally designated landscape character area.</p>
<p>Paragraph 5.9.14</p>	<p>Outside nationally designated areas, there are local landscapes that may be highly valued locally and protected by local designation. Where a local development document in England or a local development plan in Wales has policies based on landscape character assessment, these</p>	<p>Chapter 10: Landscape and Visual Amenity, ES Volume 1 [EN010143/APP/6.1] concludes there would be no significant impacts to any locally designated landscapes. It is also concluded that the Scheme would not result in significant</p>

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should be paid particular attention. However, local landscape designations should not be used in themselves to refuse consent, as this may unduly restrict acceptable development.

landscape effects to the local Landscape Character Areas during construction.

The assessment of likely impacts and effects (with embedded mitigation in place) has determined that the Scheme is likely to result in a significant adverse effect on the Howden to Bubwith LCA 5A during Operation Year 1 and Year 15 reducing to not significant during decommissioning. The Scheme is likely to result in a significant adverse effect on the West of Holme on Spalding Moor Farmland LCA 5B during Operation Year 1, with effects reducing to not significant during operation and decommissioning. It is assessed that none of the remaining character areas will experience significant effects at all assessment scenarios.

It is considered that the limited and reversible landscape and visual effects of the Scheme are clearly and comprehensively outweighed by the benefits of the Scheme in terms of delivering renewable energy infrastructure which is urgently needed in order to create a secure and affordable energy system and to help combat climate change. Therefore, in accordance with this policy, the level of landscape impacts are not considered to be so damaging that they are not offset by the benefits of the Scheme.

Paragraph 5.9.15

The scale of such projects means that they will often be visible within many miles of the site of the proposed

This policy recognises that NSIPs are likely to be visible within many miles of the site and have

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infrastructure. The IPC 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.

adverse impacts on the landscape. The policy therefore emphasises that the fact to consider in policy compliance is not whether these impacts are present, but whether they are 'so damaging' as not to be offset by the benefits of the project.

Chapter 10: Landscape and Visual Amenity, ES Volume 1 [EN0101043/APP/6.1] assesses the visual impacts of the Scheme. Through consultation with the relevant stakeholders, 29 viewpoints were chosen to illustrate the typical range of views of the Scheme as experienced from settlements, publicly accessible roads, and PRoW towards the Scheme. These representative viewpoints are illustrated on **Figure 10-7: Representative Viewpoint Locations Plan, ES Volume 3 [EN0101043/APP/6.3]**.

The design mitigation which is outlined in section 10.6 of **Chapter 10: Landscape and Visual Amenity, ES Volume 1 [EN0101043/APP/6.1]**; the **Framework LEMP [EN010143/APP/7.14]** and the **Design and Access Statement [EN010143/APP/7.3]** includes, but is not limited to, offsets from properties and local roads/PRoW; underground cabling within the Interconnecting Cable Corridor and Grid Connection Corridor; the height of the Solar PV panels; and design of fencing which has aimed to reduce the visual impact of the Scheme upon sensitive receptors.

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Significant adverse effects are predicted for visual receptors during construction and decommissioning however these are temporary effects.

During operation (Year 1), 10 of the viewpoints (3, 4, 5, 6, 7, 10a, 10b, 11, 14 and 19) and users of the Howden 20 long distance route will experience significant adverse effects, By Year 15 of operation these effects are reduced to not significant as a result of the establishment of proposed mitigation, enhancement and replacement planting and the management of existing hedgerow.

Given the size of the Scheme and the limited and localised visual effects predicted upon receptors, the Scheme's visual effects are clearly outweighed by the substantial benefits of the Scheme presented in Section 5 of the **Planning Statement [EN010143/APP/7.2]**, in particular the national benefit of large scale renewable energy infrastructure which is urgently needed in order to create a secure and affordable energy system and to help combat climate change. Therefore, in accordance with this policy, the level and nature of visual impacts are not considered to outweigh the benefits of the Scheme.

Paragraph 5.9.16

In reaching a judgment, the IPC should consider whether any adverse impact is temporary, such as during

Construction and decommissioning stage adverse effects are short term and temporary in duration.

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Paragraph 5.9.17	The IPC 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 reasonable mitigation.	<p>Operational effects beginning at Year 1 will reduce over time as mitigation planting set out in the Framework LEMP [EN010143/APP/7.14] establishes. The change to the landscape character, via the introduction of solar panels and associated infrastructure is considered to be localised and would be reversed following its 40 year operation. The reduction of effects over time and the reversibility of effects should be taken into consideration in the Secretary of State’s decision.</p> <p>Good design has been a key consideration from the outset and has shaped the design, layout and landscape design as discussed in the Design and Access Statement [EN010143/APP/7.3].</p> <p>Design mitigation has been embedded in the Scheme to minimise effects on landscape character and visual amenity whilst maintaining the operational requirements of the Scheme.</p> <p>This includes locating larger elements of the Scheme away from sensitive receptors and in locations where there are elements of natural screening; removing panels from areas to reduce significant visual effects and incorporating landscape design.</p> <p>The overall objective and measures proposed for the landscape design are explained in the Design and are set out in detail in the Framework LEMP</p>

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Paragraph 5.9.18

All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites. The IPC 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. Coastal areas are particularly vulnerable to visual intrusion because of the potential high visibility of development on the foreshore, on the skyline and affecting views along stretches of undeveloped coast.

[EN010143/APP/7.14]. As set out under Objective 2 and 4 of the **DAS [EN010143/APP/7.3]**, the Scheme has been designed to minimise its visual impact.

Chapter 10: Landscape and Visual Amenity, ES Volume 1 [EN0101043/APP/6.1] assesses the visual impacts of the Scheme. Through consultation with the relevant stakeholders, 29 viewpoints were chosen to illustrate the typical range of views of the Scheme as experienced from settlements, publicly accessible roads, and PRoW towards the Scheme. These representative viewpoints are illustrated on **Figure 10-7: Representative Viewpoint Locations Plan, ES Volume 3 [EN0101043/APP/6.3]**.

The design mitigation which is outlined in section 10.6 of **Chapter 10: Landscape and Visual Amenity, ES Volume 1 [EN0101043/APP/6.1]**; the **Framework LEMP [EN010143/APP/7.14]** and the **Design and Access Statement [EN010143/APP/7.3]** includes, but is not limited to, offsets from properties and local roads/PRoW; underground cabling within the Interconnecting Cable Corridor and Grid Connection Corridor; the height of the Solar PV panels;; and design of fencing which has aimed to reduce the visual impact of the Scheme upon sensitive receptors.

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Significant adverse effects are predicted for visual receptors during construction and decommissioning however these are temporary effects.

During operation (Year 1), 10 of the viewpoints (3, 4, 5, 6, 7, 10a, 10b, 11, 14 and 19) and users of the Howden 20 long distance route will experience significant adverse effects, By Year 15 of operation these effects are reduced to not significant as a result of the establishment of proposed mitigation, enhancement and replacement planting and the management of existing hedgerow.

Given the size of the Scheme and the limited and localised visual effects predicted upon receptors, the Scheme's visual effects are clearly outweighed by the substantial benefits of the Scheme presented in Section 5 of the **Planning Statement [EN010143/APP/7.2]**, in particular the national benefit of large scale renewable energy infrastructure which is urgently needed in order to create a secure and affordable energy system and to help combat climate change. Therefore, in accordance with this policy, the level and nature of visual impacts are not considered to outweigh the benefits of the Scheme.

Paragraph 5.9.21

Reducing the scale of a project can help to mitigate the visual and landscape effects of a proposed project.

Over time the scale of the Scheme has been reduced where the benefits in terms of reducing

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	<p>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, the 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 IPC may decide that the benefits of the mitigation to reduce the landscape and/or visual effects outweigh the marginal loss of function</p>	<p>visual, landscape, ecological and heritage effects have been justified and balanced against the generating capacity of the Scheme. This is explained further in Chapter 3: Alternatives and Design Evolution, ES Volume 2 [EN010143/APP/6.1]. In particular, panels were removed from areas around residential properties to reduce visual effects, from areas where there would be significant effects on sensitive receptors and buffer areas have been introduced around Public Rights of Way.</p> <p>The Applicant considers that there are no further reductions in the scale of the Scheme that would be justified on the grounds of mitigating visual and landscape effects, given that such changes also reduce the benefits of the Scheme in terms of electricity generation and CO2 emission reduction.</p>
Paragraph 5.9.22	<p>Within a defined site, adverse landscape and visual effects may be minimised through appropriate siting of infrastructure within that site, design including colours and materials, and landscaping schemes, depending on the size and type of the proposed project. Materials and designs of buildings should always be given careful consideration</p>	<p>Adverse landscape and visual effects have been minimised by appropriate siting of infrastructure and landscaping within the site, with particular consideration being given a layout that minimises vegetation removal and the landscaping Scheme. The nature of the Scheme means that there are limited buildings.</p> <p>The overall objective of the landscape design and mitigation measures are set out in the Framework LEMP [EN010143/APP/7.14]. As set out under Objective 2 and 4 of the DAS</p>

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[EN010143/APP/7.3], the Scheme has been designed to minimise its visual impact.

Paragraph 5.9.23

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 would mitigate the impact when viewed from a more distant vista

No offsite landscaping is required or proposed.

Land Use including Open Space, Green Infrastructure and Green Belt

Paragraph 5.10.2

The Government's policy is to ensure there is adequate provision of high quality open space (including green infrastructure) and sports and recreation facilities to meet the needs of local communities. Open spaces, sports and recreational facilities all help to underpin people's quality of life and have a vital role to play in promoting healthy living. Green infrastructure in particular will also play an increasingly important role in mitigating or adapting to the impacts of climate change

The Scheme would support this policy through the provision of new green infrastructure elements and corridor throughout the Solar PV Site, to increase habitat connectivity, enhance landscape condition and improve visual amenity within sometimes degraded agricultural landscapes.

Green infrastructure includes provision of species rich grassland, woodland and hedgerow habitats throughout the Site, as mitigation but which will also enhance ecological connectivity and habitat.

The Scheme would also include the enhancement of the current PRoW network of which two indicative routes are shown on **Figure 2-3, ES Volume 3 [EN010143/APP/6.3]**.

The first proposed permissive path is a continuation of Bridleway SPALB08 which currently terminates at Johnson's Farm (the site of the

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		<p>Operations and Maintenance Hub). This is proposed to also allowing travel on horses in response to feedback from the East Riding of Yorkshire Council's PRow team. The proposed permissive path runs northwards for approximately 340 m until it connects with the second proposed permissive path.</p> <p>The second proposed permissive path runs eastwards from footpath SPALF14, connecting with the first permissive path and continuing eastwards to the edge of the grassland habitat created in the east of Solar PV Area 1e. The path would be approximately 1.4 km in length. From discussions with East Riding of Yorkshire Council's PRow Team it is proposed that the section from SPALF14 to the connection with the first permissive path will allow travel on horses.</p>
Paragraph 5.10.3	Although the re-use of previously developed land for new development can make a major contribution to sustainable development by reducing the amount of countryside and undeveloped greenfield land that needs to be used, it may not be possible for many forms of energy infrastructure.	This policy accepts that previously developed land may not be possible to use for many forms of infrastructure, as in the case of this Scheme, which requires a large, relatively flat open area in close proximity to National Grid Drax Substation.
Paragraph 5.10.5	The ES (see Section 4.2) 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	Chapter 12: Socio-Economics and Land use, ES Volume 1 [EN010143/APP/6.1] identifies the existing baseline land use and socio-economic conditions for the Order limits, including the existing arable agricultural use of the majority of

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assess any effects of precluding a new development or use proposed in the development plan.

the site, and takes account of these in its assessment. It estimates that during construction, the Scheme will support, on average, 401 total net jobs per annum. Of these, 181 jobs per annum will be expected to be taken up by residents within the local area. It states that although these jobs are temporary, they represent a positive economic effect for a substantial period that can be estimated as the function of the scale and type of activities required to construct the Scheme.

Appendix A and Section 2.7 of the **Planning Statement [EN010143/APP/7.2]** set out the planning history identified for the Order limits and surrounding area. There are no consents, pending applications or allocations within the Solar PV Site.

Within the Grid Connection Corridor, there are 6 projects which overlap with the Scheme. These are Helios Renewable Energy Project, Scotland to England Green Link (SEGL) 2, Drax Bioenergy with Carbon Capture and Storage Project, Humber Low Carbon Pipeline, Drax Re-Power and Lakeside Energy Storage. The projects are all at different stages, some being determined, and others currently being prepared or at examination. These projects can be constructed alongside the Scheme and has been considered within the Cumulative assessment in **Chapter 17:**

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Paragraph 5.10.6	Applicants will need to consult the local community on their proposals to build on open space, sports or recreational buildings and land. Taking account of the consultations, applicants should consider providing new or additional open space including green infrastructure, sport or recreation facilities, to substitute for any losses as a result of their proposal. Applicants should use any up-to-date local authority assessment or, if there is none, provide an independent assessment to show whether the existing open space, sports and recreational buildings and land is surplus to requirements	Cumulative Effects, ES Volume 1 [EN010143/APP/6.1]. The Scheme is located within East Riding of Yorkshire's Minerals Safeguarding Area (MSA) EC6 and parts of the Grid Connection Corridor lie within an (unnamed) area of safeguarded surface mineral resource in North Yorkshire. The Scheme would not impact mineral resources and safeguards mineral resources within the Order limits by not preventing the extraction of mineral in the future after any decommissioning has taken place. The Scheme does not include any proposals to build on open space, sports or recreational buildings and land.
Paragraph 5.10.8	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	Agricultural land quality was a key consideration of the site selection process as set out in Chapter 3:

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and 5) except where this would be inconsistent with other sustainability considerations. Applicants should also identify any effects and seek to minimise impacts on soil quality taking into account any mitigation measures proposed. For developments on previously developed land, applicants should ensure that they have considered the risk posed by land contamination.

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Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1].

The Scheme is located mostly on lower quality agricultural land, with the majority of the Scheme being on land not classed as Best and Most Versatile (BMV). For the Solar PV Site, 92.8% of the land used is non BMV land.

The Applicant has taken a sequential approach to agricultural land considering whether land of lower grade is available and suitable. There were no other alternative sites within the Initial Area of Search which would be of lower grade agricultural land (compared to the majority of the Order limits) that were available or considered suitable for the Scheme and its objectives.

With regard to the Grid Connection Corridor, the land immediately surrounding Drax Substation is classed as BMV of grades 1-2. Therefore, there are no reasonable alternatives which use land of lower classification available for the Grid Connection Corridor.

Following Statutory Consultation, the Site Area was reduced with the removal of land to the south of solar PV areas 3c and 2g to the south of the SEGL2 development which subsequently reduced further the proportion of BMV land within the scheme.

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The vast majority of agricultural land within the Order limits would be available for return to its existing agricultural use following decommissioning of the Scheme. **Chapter 15: Soils and Agricultural Land, ES Volume 1 [EN010143/APP/6.1]** concludes that a very small amount (0.41 ha) of BMV Subgrade 3a land for tree planting would be permanently removed from agricultural use which would result in an ecological benefit. 8.97 ha of Subgrade 3b would be permanently removed from agricultural use as a result tree and hedge planting and 2 ha as a result of the potential retention of the Grid Connection Substations and associated accesses.

In addition, the conversion of arable to grassland during the 40 year operational period has the potential to accrue improvement to soil function over a large area during operation which has a slight beneficial effect.

The cumulative impacts of the Scheme with other existing and proposed energy sector developments is set out in **chapters 6 – 16, ES Volume 1 [EN010143/APP/6.1]** and is summarised in **Chapter 17: Cumulative Effects and Interactions, ES Volume 1 [EN010143/APP/6.1]**.

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There will not be any new likely significant effects associated with cumulative effects that are not already accounted for by the assessment of the Scheme. An exception is the functional improvement of soil resources that would follow conversion of arable to grassland when considered with the other solar farm proposals in North Yorkshire, which is considered to be moderately beneficial, which is significant.

It is also considered that the land beneath the solar PV arrays would be suitable for sheep grazing while the Scheme is in operation.

A Framework Soils and Management Plan [EN010143/APP/7.10] sets out the principles on how soils will be managed and protected during the construction, operation and decommissioning of the Scheme. A detailed soil resource management plan will be prepared prior to construction as secured by DCO Requirement.

Paragraph 5.10.9

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

Small parts of the Scheme are located within East Riding of Yorkshire's Minerals Safeguarding Area (MSA) EC6 and parts of the Grid Connection Corridor lie within an (unnamed) area of safeguarded surface mineral resource in North Yorkshire as shown in **Appendix D** of the **Planning Statement [EN010143/APP/7.2]**.
Chapter 12:Socio economics and land use, ES

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Paragraph 5.10.15

The IPC should ensure that applicants do not site their scheme on the best and most versatile agricultural land without justification. It should give little weight to the loss of poorer quality agricultural land (in grades 3b, 4 and 5), except in areas (such as uplands) where particular agricultural practices may themselves contribute to the quality and character of the environment or the local economy.

Volume 1 [EN010143/APP/6.1] and Appendix 12-2 Communications with Minerals Planning Authorities, ES Volume 2 [EN010143/APP/6.2] explain that the impact of the Scheme on minerals was scoped out of the environmental impact assessment in agreement with the North Yorkshire Council Mineral Planning Authority.

The Scheme would not impact mineral resources and safeguards mineral resources within the Order limits by not preventing the extraction of mineral in the future after any decommissioning has taken place.

Agricultural land quality was a key consideration of the site selection process as set out in **Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1]**. The Scheme is located mostly on lower quality agricultural land, with the majority of the Scheme being on land not classed as Best and Most Versatile (BMV). For the Solar PV Site, 92% of the land used is non BMV land.

The Applicant has taken a sequential approach to agricultural land considering whether land of lower grade is available and suitable. There were no other alternative sites within the Initial Area of Search which would be of a lower grade agricultural land (compared to the majority of the

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Order limits) that were available or considered suitable for the Scheme and its objectives.

With regard to the Grid Connection Corridor, the land immediately surrounding Drax Substation is classed as BMV of grades 1-2. Therefore, there are no reasonable alternatives which use land of lower classification available for the Grid Connection Corridor.

Following Statutory Consultation, the Site Area was reduced with the removal of land to the south of solar PV areas 3c and 2g to the south of the SEGL2 development which subsequently reduced further the proportion of BMV land within the scheme.

The vast majority of agricultural land within the Order limits would be available for return to agriculture following decommissioning of the Scheme. **Chapter 15: Soils and Agricultural Land, ES Volume 1 [EN010143/APP/6.1]** concludes that a very small amount (0.41 ha) of BMV Subgrade 3a land for tree planting would be permanently removed from agricultural use.

In addition, the conversion of arable to grassland during the 40 year operational period has potential to accrue improvement to soil function over a large area during operation which has a slight beneficial effect.

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The cumulative impacts of the Scheme with other existing and proposed energy sector developments is set out in **chapters 6 – 16, ES Volume 1 [EN010143/APP/6.1]** and is summarised in **Chapter 17: Cumulative Effects and Interactions, ES Volume 1 [EN010143/APP/6.1]**.

There will not be any new likely significant effects associated with cumulative effects that are not already accounted for by the assessment of the Scheme. An exception is the functional improvement of soil resources that would follow conversion of arable to grassland when considered with the other solar farm proposals in North Yorkshire, which is considered to be moderately beneficial, which is significant.

It is also considered that the land beneath the solar PV arrays would be suitable for sheep grazing while the Scheme is in operation.

A Framework Soils and Management Plan [EN010143/APP/7.10] sets out the principles on how soils will be managed and protected during the construction, operation and decommissioning of the Scheme. A detailed soil resource management plan will be prepared prior to construction as secured by DCO Requirement.

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Paragraph 5.10.19	Although in the case of much 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 at least of that use can still be retained post project construction) applicants should nevertheless seek to minimise these effects and the effects on existing or planned uses near the site by the application of good design principles, including the layout of the project	<p>Agricultural land quality was a key consideration for site selection. This directed the Solar PV Site towards areas provisionally mapped as ALC Grade 4. Although subsequent desk-based study and field survey have reclassified the Grade 4 land as principally Subgrade 3b, which is still classed as non-BMV. The Design and Access Statement [EN010143/APP/67.3] sets out details of how the Scheme incorporates good design principles, including the decisions taken in relation to the layout of the Scheme.</p> <p>As part of the design process and using the results of soil surveys and other sources of ALC data for the Solar PV Site, the Applicant has sought to minimise the amount of BMV agricultural land included within the Solar PV Site. Specifically, the Applicant reduced the areas of Solar PV Area 2g and Solar PV Area 3c, removing BMV land from the Scheme.</p>
Paragraph 5.10.20	Where green infrastructure is affected, the IPC should consider imposing requirements to ensure the 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 new coastal access routes.	<p>The Scheme would support this”poli’y through the provision of new green infrastructure elements and corridor throughout the Solar PV Site, to increase habitat connectivity, enhance landscape condition and improve visual amenity within sometimes degraded agricultural landscapes.</p> <p>Green infrastructure includes provision of species rich grassland, woodland and hedgerow habitats</p>

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throughout the Site, as mitigation but which will also enhance ecological connectivity and habitat.

The Scheme would also include the enhancement of the current PRow network of which two indicative routes are shown on **Figure 2-3, ES Volume 3 [EN010143/APP/6.3]**.

The first proposed permissive path is a continuation of Bridleway SPALB08 which currently terminates at Jo'nson's Farm (the site of the Operations and Maintenance Hub). This is proposed to also allowing travel on horses in response to feedback from the East Riding of Yorkshire Council's PRow team. The proposed permissive path runs northwards for approximately 340 m until it connects with the second proposed permissive path.

The second proposed permissive path runs eastwards from footpath SPALF14, connecting with the first permissive path and continuing eastwards to the edge of the grassland habitat created in the east of Solar PV Area 1e. The path would be approximately 1.4 km in length. From discussions with East Riding of Yorkshire Co'nci's PRow Team it is proposed that the section from SPALF14 to the connection with the first permissive path will allow travel on horses.

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5.10.22	Where a proposed development has an impact upon a Mineral Safeguarding Area (MSA), the IPC should ensure that appropriate mitigation measures have been put in place to safeguard mineral resources.	<p>Small parts of the Scheme are located within East Riding of Yorkshire's Minerals Safeguarding Area (MSA) EC6 and an (unnamed) area of safeguarded surface mineral resource in North Yorkshire as shown in Appendix D of the Planning Statement [EN010143/APP/7.2]. Chapter 12: Socio economics and land use, ES Volume 1 [EN010143/APP/6.1] and Appendix 12-2 Communications with Minerals Planning Authorities, ES Volume 2 [EN010143/APP/6.2] explain that the impact of the Scheme on minerals was scoped out of the environmental impact assessment in agreement with the North Yorkshire Council Mineral Planning Authority.</p> <p>The Scheme would not impact mineral resources and safeguards mineral resources within the Order limits by not preventing the extraction of mineral in the future after any decommissioning has taken place.</p>
Paragraph 5.10.24	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 IPC should expect applicants to take appropriate mitigation measures to address adverse effects on coastal access, National Trails and other rights of way. Where this is not the case the IPC should consider what appropriate mitigation requirements might be attached to any grant of development consent	Chapter 12: Socio-Economics and Land use, ES Volume 1 [EN010143/APP/6.1] sets out that there are 10 PRoW either located entirely within the Solar PV Site, or which pass through the Solar PV Site and continue outside of it. There are a further 10 PRoW which are located along or abutting the Solar PV Site boundary but do not traverse it.

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There are no national trails or national cycle routes within the Solar PV Site or Interconnecting Cable Corridor. However, the 'Howden 20' is a 20 mile (approximately 32 km) named 'challenge walk'. This circular recreational route passes along PRowS through the Solar PV Site and the Interconnecting Cable Corridor at various locations, as shown on **Figures 2-2 and 2-3, ES Volume 3 [EN010143/APP/6.3]**.

The Scheme has been designed to have minimal to no impact on PRowS and will not require any PRow closures. Within the Solar PV Site, the Scheme ensures a minimum width for PRow, as well as for the corridor in which they will be provided (between Scheme infrastructure). In all cases the PRow will see perimeter fencing being installed a minimum distance from the centreline of the PRow of 20 m to either side (creating a 40 m corridor) if infrastructure is on both sides of the PRow, and of 15 m if infrastructure lies to one side only. This will help avoid the perception of being channelled into narrow passages between solar PV panels;

In addition, the Scheme creates new native hedgerows with trees along the Howden 20 Route and PRow BUBWF10, and provides locally appropriate flower-rich grassland with pollen and nectar-rich flowers for pollinators, which are

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beneficial to insects and attractive to farmland birds, in an ornamental display along public rights of way.

Permissive Paths to enhance the current PRoW network will be provided as part of the Scheme and will be available during the operational stage. Two indicative routes are shown on **Figure 2-3, ES Volume 3 [EN010143/APP/6.3]**.

Given that there are no expected closures or diversions, and that new Permissive Paths will be available, there is assessed to be a beneficial impact on PRoW.

A Framework Public Right of Way Management Plan [EN010143/APP/7.14] has been submitted alongside the application. It is anticipated that a detailed Public Right of Way Management Plan will be required post consent as secured by the DCO.

Noise and Vibration

Paragraph 5.11.1

Excessive noise can have wide-ranging impacts on the quality of human life, health (for example owing to annoyance or sleep disturbance) and use and enjoyment of areas of value such as quiet places and areas with high landscape quality. The Government's policy on noise is set out in the Noise Policy Statement for England. It promotes good health and good quality of life through effective noise management. Similar considerations apply to vibration,

Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1] recognises and assesses the impacts of noise and vibration of the Scheme on health and quality of life. It is therefore considered that the Scheme is compliant with this policy.

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
	<p>which can also cause damage to buildings. In this section, in line with current legislation, references to “noise” below apply equally to assessment of impacts of vibration</p>	
<p>Paragraph 5.11.2</p>	<p>Noise resulting from a proposed development can also have adverse impacts on wildlife and biodiversity. Noise effects of the proposed development on ecological receptors should be assessed by the IPC in accordance with the Biodiversity and Geological Conservation section of this NPS</p>	<p>Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] includes an assessment of the likely impacts and effects of noise on relevant ecological features. It is therefore considered that the Scheme is compliant with this policy</p>
<p>Paragraph 5.11.3</p>	<p>Factors that will determine the likely noise impact include:</p> <ul style="list-style-type: none"> • the inherent operational noise from the proposed development, and its characteristics; • the proximity of the proposed development to noise sensitive premises (including residential properties, schools and hospitals) and noise sensitive areas (including certain parks and open spaces); • the proximity of the proposed development to quiet places and other areas that are particularly valued for their acoustic environment or landscape quality; and • the proximity of the proposed development to designated sites where noise may have an adverse impact on protected species or other wildlife. 	<p>Section 11.4 of Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1] and its supporting appendices explain the noise and vibration assessment methodology which has considered the factors identified by this policy.</p> <p>Section 11. 4 of Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1] describes the noise sensitive premises and areas that have been identified. Noise-sensitive sensitive receptors have been identified through a desktop study of aerial imagery and mapping and are presented in Figure 11-1, ES Volume 2, and are summarised in Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1].</p> <p>The locations of these recept”rs h’ve been considered in both the construction and operational noise assessments.</p>

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
Paragraph 5.11.4	<p>Where noise impacts are likely to arise from the proposed development, the applicant should include the following in the noise assessment:</p> <ul style="list-style-type: none">• a description of the noise generating aspects of the development proposal leading to noise impacts, including the identification of any distinctive tonal, impulsive or low frequency characteristics of the noise;• identification of noise sensitive premises 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;	<p>Noise from the construction, operation and decommissioning of the Scheme is considered throughout Chapter 11 and therefore it is considered that the Scheme is compliant with this policy.</p> <p>Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] Includes an assessment of the likely impacts and effects of noise on designated ecological sites.</p> <p>It is therefore considered that the methodology used in the ES [EN010143/APP/6.1] complies with this policy.</p> <p>Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1] presents a noise assessment in accordance with the requirements of this policy, including a description of the noise generating aspects of the development.</p> <p>Section 11.4 of Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1] describes the noise sensitive premises and areas that have been identified. Noise-sensitive sensitive receptors have been identified through a desktop study of aerial imagery and mapping and are presented in Figure 11-1, ES Volume 2, and are summarised in Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1]. The locations of these</p>

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
	<ul style="list-style-type: none">• 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 as appropriate.• an assessment of the effect of predicted changes in the noise environment on any noise sensitive premises and noise sensitive areas; and• measures to be employed in mitigating noise. The nature and extent of the noise assessment should be proportionate to the likely noise impact.	<p>receptors have been considered in both the construction and operational noise assessments.</p> <p>Section 11.5 of Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1] outlines the characteristics of the existing noise environment for the Scheme and surrounding areas.</p> <p>Section 11.6 of Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1] describes the embedded design mitigation for the Scheme with respect to noise and vibration, encompassing the construction, operation and decommissioning phases.</p> <p>Section 11.7 of Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1] assesses the noise generated by the Scheme during the construction period and operating life of the infrastructure (including features), including at particular times of the day and at night, on the noise sensitive premises and areas outlined in Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1].</p> <p>The noise assessment is proportionate to the likely noise impact, which would be managed through the Framework CEMP, Appendix 2-1, ES Volume 2 [EN010143/APP/6.2] during construction and would be limited by the nature of</p>

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
Paragraph 5.11.5	The noise impact of ancillary activities associated with the development, such as increased road and rail traffic movements, or other forms of transportation, should also be considered.	<p>the Scheme and very small amount of traffic generated during operation.</p> <hr/> <p>The construction noise assessments presented in Section 11.7 of Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1] include the assessment of noise resulting from road and rail traffic movements generated during construction. Traffic during the operational period will be negligible. It concludes that no significant noise or vibration effects are predicted during the operational phase.</p> <p>Significant effects are anticipated during construction from night-time HDD activities at the Grid Connection Corridor and the Interconnecting Cable Corridor. It should be noted that identification of likely significant effects is precautionary based on the worst-case assumption that 24-hour HDD working would be required. These effects would only occur during construction and would be mitigated through a communication strategy and noise complaint system which will be secured through the DCO as part of the Framework CEMP [EN010143/APP/7.7] and Detailed CEMP (a requirement of the DCO).</p>
Paragraph 5.11.6	Operational noise, with respect to human receptors, should be assessed using the principles of the relevant British	Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1] assessed operational plant

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
	<p>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</p>	<p>noise at sensitive receptors (including human receptors) following BS 4142 guidance, BS8233:2014 and World Health Organization guidance. Assessment of construction and decommissioning noise has been assessed in line with Annex E of British Standards 5228-1.</p>
<p>Paragraph 5.11.7</p>	<p>The applicant should consult EA and Natural England (NE), or the Countryside Council for Wales (CCW), as necessary and in particular with regard to assessment of noise on protected species or other wildlife. The results of any noise surveys and predictions may inform the ecological assessment. The seasonality of potentially affected species in nearby sites may also need to be taken into account.</p>	<p>The Applicant has taken account of advice from the EA and Natural England throughout the preparation of the Environmental Statement.</p> <p>Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] takes account of noise in its assessment of the impact of the Scheme on protected species and other wildlife.</p>
<p>Paragraph 5.11.8</p>	<p>The project should demonstrate good design through selection of the quietest cost-effective plant available; containment of noise within buildings wherever possible; optimisation of plant layout to minimise noise emissions; and, where possible, the use of landscaping, bunds or noise barriers to reduce noise transmission.</p>	<p>As detailed in Section 11.6 of Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1], embedded mitigation measures for the operational phase have been considered with reference to this policy. Embedded mitigation measures that will be applied includes:</p> <ul style="list-style-type: none"> • Plant selection; • Design Location and orientation of Field Station Units / Field Substations, and the Grid

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
Paragraph 5.11.9	<p>The IPC should not grant development consent unless it is satisfied that the proposals will meet the following aims:</p> <ul style="list-style-type: none"> • 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 	<p>Connection Substations to minimise noise at receptors.</p> <ul style="list-style-type: none"> • Best Practicable Means that would be implemented during construction works and secured through the CEMP and DEMP • Where practicable, avoid HDD works within 200 m (the distance at which significant effects are predicted at night) of residential receptors (although this will depend on the results of the ground investigation survey); • Where HDD activities may occur within 200 m of sensitive receptors, the option for open cut cable laying will be explored as an alternative to HDD; <p>The Scheme therefore demonstrates good design.</p>
		<p>Section 11.7 of Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1] concludes that there no significant noise or vibration effects no significant noise or vibration effects are predicted during the construction and decommissioning phases or the operational phase with the exception of night-time HDD activities in the construction phase, when considering the worst-case scenario of 24 hour HDD working.</p>

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Paragraph 5.11.10	When preparing the development consent order, the IPC should consider including measurable requirements or specifying the mitigation measures to be put in place to ensure that noise levels do not exceed any limits specified in the development consent.	These effects would only occur during construction and would be mitigated through a communication strategy and noise complaint system will be secured through the DCO as part of the Framework CEMP [EN010143/APP/7.7] and Detailed CEMP (a requirement of the DCO). No existing noise issues have been identified that the Scheme could contribute to improving.
Paragraph 5.11.11	The IPC 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 IPC may wish to impose requirements. Any such requirements should take account of the guidance set out in Circular 11/95 (see Section 4.1) or any successor to it.	Additional mitigations measures are set out in section 11.8 of Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1] . With the implementation of these measures, no significant noise or vibration effects are predicted during the construction and decommissioning phases or the operational phase with the exception of night-time HDD activities in the construction phase, when considering the worst-case scenario of 24 hour HDD working.
Paragraph 5.11.12	Mitigation measures may include one or more of the following: <ul data-bbox="465 1086 1294 1359" style="list-style-type: none">• engineering: reduction of noise at point of generation and containment of noise generated;• lay-out: adequate distance between source and noise-sensitive receptors; incorporating good design to minimise noise transmission through screening by natural barriers, or other buildings; and	Measures are also set out within the Framework CEMP [EN010143/APP/7.7] , the Framework OEMP [EN010143/APP/7.8] and the Framework DEMP [EN/010143/APP/7.9] . All mitigation measures listed were considered in the development of the approaches set out in these documents.

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	<ul style="list-style-type: none"> administrative: restricting activities allowed on the site; specifying acceptable noise limits; and taking into account seasonality of wildlife in nearby designated sites 	
Paragraph 5.11.13	In certain situations, and only when all other forms of noise mitigation have been exhausted, it may be appropriate for the IPC to consider requiring noise mitigation through improved sound insulation to dwellings.	As no permanent significant noise effects are identified, no mitigation (such as sound insulation to dwellings) is provided other than that covered in Section 11.8 of Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1] .
Paragraph 5.11.15	Developments should contribute to and enhance the natural and local environment by preventing new and existing developments from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.	An assessment of the effect of predicted changes to the noise environment at noise sensitive receptors are summarised in Section 11.9, Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1] . No unacceptable levels of noise pollution are identified.
Socio Economic Impacts		
Paragraph 5.12.2	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 4.2).	Section 12.7 of Chapter 12: Socio-Economics and Land Use, ES Volume 1 [EN010143/APP/6.1] includes an assessment of socio-economic impacts at local and regional levels, including employment, the local economy, users of PRow residential properties, business properties and community facilities.

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Paragraph 5.12.3	<p>This assessment should consider all relevant socio-economic impacts, which may include:</p> <ul style="list-style-type: none">the creation of jobs and training opportunities;the provision of additional local services and improvements to local infrastructure, including the provision of educational and visitor facilities;effects on tourism;the impact of a changing influx of workers during the different construction, operation and decommissioning phases of the energy infrastructure. <p>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).</p> <p>There could also be effects on social cohesion depending on how populations and service provision change as a result of the development; and</p> <p>cumulative effects – if development consent were to be granted to for a number of projects within a region and these were developed in a similar timeframe, there could be some short-term negative effects, for example a potential shortage of construction workers to meet the needs of other industries and major projects within the region.</p>	<p>Chapter 12: Socio-Economics and Land Use, ES Volume 1 [EN010143/APP/6.1] includes an assessment of socio-economic impacts that fulfils the requirements of this policy.</p>

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
Paragraph 5.12.4	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.	The current socio-economic baseline conditions of the study area has been described in Chapter 12: Socio-Economics and Land Use, ES Volume 1 [EN010143/APP/6.1] . The Scheme's compliance with local planning policies is considered in Appendix C and D of the Planning Statement [EN010143/APP/7.2] .
Paragraph 5.12.5	Socio-economic impacts may be linked to other impacts, for example the visual impact of a development is considered in Section 5.9 but may also have an impact on tourism and local businesses	Chapter 12: Socio-Economics and Land Use, ES Volume 1 [EN010143/APP/6.1] undertakes an assessment of the Scheme's impact on residential properties, business premises, community facilities and development land. Overall, there would be no effect to these receptors during the scheme operation. During construction and decommissioning, the magnitude of impact is assessed to be low, given no direct land take aside from temporary impacts on the Highfield Garage forecourt, no amenity impacts, some connectivity impacts, and limited potential for interference with overlapping developments. This results in a minor adverse effect, which is not significant.
Paragraph 5.12.8	The IPC should consider any relevant positive provisions the developer 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	Mitigation measures are embedded within the Scheme, and are set out in the respective chapters of the ES [EN010143/APP/6.1] , to reduce other construction and operational effects (such as noise, air quality, transport and landscape) which in turn will mitigate the effects on the local

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phasing development in relation to the socio-economic impacts.

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community and existing facilities from a socio-economic and land use perspective.

Chapter 12: Socio-Economics and Land Use, ES Volume 1 [EN010143/APP/6.1 identifies that the Scheme will result in beneficial effects that are significant on the local economy as a result of employment generation during the construction and decommissioning periods. During the construction phase, a **Framework Skills, Supply Chain and Employment Plan [EN010143/APP/7.15]** will be implemented. The purpose of this is to promote employment and training opportunities associated with the construction and operation of the Scheme. The implementation of this Plan will help to maximise the positive gain for the local economy from the beneficial effect arising from employment generation.

Section 5.3 of this Planning Statement [EN010143/APP/7.2] also sets out the benefits of the Scheme. Along with contributing to a sufficient, reliable and affordable energy system whilst helping the Government decarbonise, and meet national climate change targets and budgets, the Scheme provides a number of other benefits, which all have an impact on socio-economics, which are set out below.

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Environmental Benefits – The Scheme would provide a number of ecological enhancements through its landscape design. The Scheme would also provide soil improvements as a result of the change from arable farming to grassland. These measures are set out in full in the **Framework LEMP [EN010143/APP/7.14]**. The Applicant is committed to exceeding the Government’s 10% target for biodiversity net gain as set out in the Environment Act 2021. A **Biodiversity Net Gain (BNG) report [EN010143/APP/6.2]** demonstrates that the Scheme has the potential to deliver significant biodiversity net gain on the Site, with 80% gain predicted for habitat biodiversity units.

Permissive Paths – Two permissive paths would be provided as part of the Scheme which would provide access to the local population to open space, having a beneficial impact on health and wellbeing.

Economic Benefits – The Scheme would result in 401 net jobs per annum during construction and would contribute to the development of skills needed for the UK’s transition to Net Zero by 2050 and described within the Net Zero Strategy: Building Back Greener. It is also estimated that the construction of the Scheme would contribute approximately £22.5 million to the national

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
Paragraph 5.12.9	The IPC 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.	economy, of which £10.1m would likely be within the local area. No significant adverse socio-economic effects are predicted as a result of the Scheme. Embedded and additional mitigation measures have been incorporated as set out throughout Chapter 12: Socio-Economics and Land Use, ES Volume 1 [EN010143/APP/6.1] .
Traffic and Transport		
Paragraph 5.13.1	The transport of materials, goods and personnel to and from a development during all project phases can have a variety of impacts on the surrounding transport infrastructure and potentially on connecting transport networks, for example through increased congestion. Impacts may include economic, social and environmental effects. Environmental impacts may result particularly from increases in noise and emissions from road transport. Disturbance caused by traffic and abnormal loads generated during the construction phase will depend on the scale and type of the proposal.	An assessment of Heavy Goods Vehicles (HGVs) including abnormal indivisible loads (AIL) and construction staff is contained within the Transport and Access chapter of the ES as well as the Transport Assessment (TA) (Appendix 13-4, ES Volume 2 [EN010143/APP/6.2]) and a Framework CTMP Appendix 13-5, ES Volume 2 [EN010143/APP/6.2]) document. During construction, it has been identified that with embedded mitigation measures in place there could be potentially significant adverse effects at Link 15 in terms of construction traffic increase during the hours of 06:00-07:00 and 19:00-20:00. Over the course of a 24-hour period, during construction (and decommissioning), it is anticipated that Link 15 will see a 6% increase in total traffic and a 0% increase in HGV traffic. This

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indicates that the overall impact on the road network will be low at this link location during the hours of 07:00-19:00.

These effects will be temporary, and only occur during the construction of the Scheme. **Chapter 13: Transport and Access, ES Volume 1 [EN010143/APP/6.1]** states that there will be no significant effects as a result of the Scheme on transport and access during operation.

In addition, the effects on Link 15 would not result in any significant adverse economic, social or environmental effects, including noise and emissions, as set out in the **relevant chapters in the ES [EN010143/APP/6.1]**.

Paragraph 5.13.2

The consideration and mitigation of transport impacts is an essential part of Government's wider policy objectives for sustainable development as set out in Section 2.2 of this NPS

The **TA (Appendix 13-4, ES Volume 2 [EN010143/APP/6.2])** and the **Framework CTMP (Appendix 13-5, ES Volume 2 [EN010143/APP/6.2])** outline measures proposed to mitigate the transport impacts. The DCO will ensure that these measures will be developed in detail and complied with.

Chapter 13: Transport and Access, ES Volume 1 [EN010143/APP/6.1] provides an assessment of impacts, describes traffic routing and parking measures (as evolved at this stage) and provides mitigation measures (along with the Framework

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
Paragraph 5.13.3	<p>If a project is likely to have significant transport implications, the applicant's ES (see Section 4.2) should include a transport assessment, using the NATA/WebTAG139 methodology stipulated in Department for Transport guidance, or any successor to such methodology. Applicants should consult the Highways Agency and Highways Authorities as appropriate on the assessment and mitigation</p>	<p>CEMP at Appendix 2-1, ES Volume 2 [EN010143/APP/6.2]</p> <hr/> <p>Appendix 13-4, ES Volume 2 [EN010143/APP/6.1] contains a transport Assessment, prepared in accordance with the appropriate guidance which includes the Travel Plans, TAs and Transport Statements in Decision Taking (2014). The Applicant has consulted with the relevant Highways Authorities and National Highways regarding the assessment and mitigation. Comments from these stakeholders are presented in Section 13.3 of Chapter 13: Transport and Access, ES Volume 1 [EN010143/APP/6.1].</p>
Paragraph 5.13.4	<p>Where appropriate, the applicant should prepare a travel plan including demand management measures to mitigate transport impacts. The applicant should also provide details of proposed measures to improve access by public transport, walking and cycling, to reduce the need for parking associated with the proposal and to mitigate transport impacts.</p>	<p>A Framework CTMP, ES Volume 2 [EN010143/APP/6.2] outlines measures that will be included in the final CTMP to mitigate transport impact, manage demand, and improve and encourage construction staff to access the Order limits by public transport, cycling and reduce car transport to, and parking at, the Order Limits.</p>
Paragraph 5.13.5	<p>If additional transport infrastructure is proposed, applicants should discuss with network providers the possibility of co-funding by Government for any third-party benefits. Guidance has been issued in England which explains the circumstances where this may be possible, although the</p>	<p>Appendix 13-4, ES Volume 2 [EN010143/APP/6.2] contains a Transport Assessment, prepared in accordance with the appropriate guidance which includes the Government's Planning Practice Guidance; Travel</p>

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	<p>Government cannot guarantee in advance that funding will be available for any given uncommitted scheme at any specified time</p>	<p>Plans, TAs and Transport Statements in Decision Taking (2014).</p> <p>The Applicant has consulted with the relevant Highways Authorities and National Highways regarding the assessment and mitigation. Comments from these stakeholders are presented in Chapter 13: Transport and Access, ES Volume 1 [EN010143/APP/6.1].</p>
<p>Paragraph 5.13.6</p>	<p>A new energy NSIP may give rise to substantial impacts on the surrounding transport infrastructure and the IPC should therefore ensure that the applicant has sought to mitigate these impacts, including during the construction phase of the development. Where the proposed mitigation measures are insufficient to reduce the impact on the transport infrastructure to acceptable levels, the IPC should consider requirements to mitigate adverse impacts on transport networks arising from the development, as set out below. Applicants may also be willing to enter into planning obligations for funding infrastructure and otherwise mitigating adverse impacts</p>	<p>Section 13.6 of Chapter 13: Transport and Access, ES Volume 1 [EN010143/APP/6.1] outlines the embedded design mitigation measures in relation to traffic and transport, including HGV deliveries and staff vehicles.</p> <p>During construction, it has been identified that with embedded mitigation measures in place there could be potentially significant adverse effects at Link 15 in terms of construction traffic increase during the hours of 06:00-07:00 and 19:00-20:00. Over the course of a 24-hour period, during construction (and decommissioning), it is anticipated that Link 15 will see a 6% increase in total traffic and a 0% increase in HGV traffic. This indicates that the overall impact on the road network will be low at this link location during the hours of 07:00-19:00.</p> <p>These effects will be temporary, and only occur during the construction of the Scheme. Chapter</p>

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
Paragraph 5.13.7	<p>Provided that the applicant is willing to enter into planning obligations or requirements can be imposed to mitigate transport impacts identified in the NATA/WebTAG transport assessment, with attribution of costs calculated in accordance with the Department for Transport's guidance, then development consent should not be withheld, and appropriately limited weight should be applied to residual effects on the surrounding transport infrastructure.</p>	<p>13: Transport and Access, ES Volume 1 [EN010143/APP/6.1] states that there will be no significant effects as a result of the Scheme on transport and access during operation.</p> <p>A CETMP will be prepared prior to the commencement of development, to be substantially in accordance with the Framework CTMP submitted with the Application in Appendix 13-5, ES Volume 2 [EN010143/APP/6.2].</p> <p>The design of accesses at the site has taken into account the number and type of vehicles that will use them to avoid queuing on surrounding roads during construction. Parking will also be provided on site. The Applicant has also considered the routing of Abnormal Indivisible Load vehicles to the site to ensure safe, low impact routes are identified.</p> <p>Measures outlined in the Framework CTMP (Appendix 13-5, ES Volume 2 [EN010143/APP/6.2]) will be secured as part of the DCO application.</p>
Paragraph 5.13.8	<p>Where mitigation is needed, possible demand management measures must be considered and if feasible and</p>	<p>Provision of new transport infrastructure is not required, as Chapter 13: Transport and Access,</p>

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
	<p>operationally reasonable, required, before considering requirements for the provision of new inland transport infrastructure to deal with remaining transport impacts.</p>	<p>ES Volume 1 [EN010143/APP/6.1] states that there are anticipated to be no significant adverse effects on transport and access as a result of the construction, operation or decommissioning of the Scheme following the implementation of the mitigation measures, including demand management measures identified in Chapter 13: Transport and Access, ES Volume 1 [EN010143/APP/6.1]. No additional transport mitigation, other than embedded mitigation, is proposed.</p>
<p>Paragraph 5.13.9</p>	<p>The IPC 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.</p>	<p>Traffic generated by the Scheme during its operational phase will not be of a level that requires management. No new transport infrastructure is therefore proposed as part of the Scheme. During the construction and decommissioning periods, traffic impact will be managed in accordance with measures set out in the Framework CTMP (Appendix 13-5, ES Volume 2 [EN010143/APP/6.2]). A detailed CTMP will be prepared in accordance with the Framework CTMP, and will be secured by the DCO.</p>
<p>Paragraph 5.13.10</p>	<p>Water-borne or rail transport is preferred over road transport at all stages of the project, where cost-effective.</p>	<p>As set out in Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1] and the Framework CTMP [EN010143/APP/6.2] the Scheme would encourage all construction staff to</p>

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
Paragraph 5.13.11	<p>The IPC may attach requirements to a consent where there is likely to be substantial HGV traffic that:</p> <ul style="list-style-type: none">• 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, either on the site or at dedicated facilities elsewhere, to 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	<p>use lower carbon modes of transport by identifying and communicating local bus and rail connections.</p> <hr/> <p>During operation there will not be significant HGV traffic to the Scheme.</p> <p>During construction, it has been identified that with embedded mitigation measures in place there could be potentially significant adverse effects at Link 15 in terms of construction traffic increase during the hours of 06:00-07:00 and 19:00-20:00. Over the course of a 24-hour period, during construction (and decommissioning), it is anticipated that Link 15 will see a 6% increase in total traffic and a 0% increase in HGV traffic. This indicates that the overall impact on the road network will be low at this link location during the hours of 07:00-19:00.</p> <p>These effects will be temporary, and only occur during the construction of the Scheme. There is not anticipated to be any significant impacts relating to transport during the operational phase of the Scheme.</p> <p>A CTMP would be prepared prior to the commencement of development, to be substantially in accordance with the Framework CTMP submitted with the Application in Appendix 13-5, ES Volume 2 [EN010143/APP/6.2].</p>

**NPS EN-1
Relevant Paragraph**

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Detail**

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Proposed Development compliance**

The design of accesses at the site has taken into account the number and type of vehicles that will use them to avoid queuing on surrounding roads during construction. Parking will also be provided on site. The Applicant has also considered the routing of Abnormal Indivisible Load vehicles to the site to ensure safe, low impact routes are identified.

Waste Management

Paragraph 5.14.1

Government policy on hazardous and non-hazardous waste is intended to protect human health and the environment by producing less waste and by using it as a resource wherever possible. Where this is not possible, waste management regulation ensures that waste is disposed of in a way that is least damaging to the environment and to human health.

Waste management is considered in **Chapter 16, ES Volume 1 [EN010143/APP/6.1]**. A Site Waste Management Plan (SWMP), **Appendix 16-4, ES Volume 2 [EN010143/APP/6.1]**, will be produced prior to construction. Further details of materials and waste management will also be provided in a **Framework SWMP [EN010143/APP/6.2]** which will accompany the **ES [EN010143/APP/6.1]**. 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 is considered in **Chapter 16, ES Volume 1 [EN010143/APP/6.1]**.

Paragraph 5.14.2

Sustainable waste management is implemented through the “waste hierarchy”, which sets out the priorities that must be applied when managing waste:

Section 16.7 of Chapter 16, Other Environmental Topics of the ES [EN010143/APP/6.1] considers the impacts of

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
Paragraph 5.14.3	<ul style="list-style-type: none"> • prevention; • preparing for reuse; • recycling; • other recovery, including energy recovery; and • disposal <p>Disposal of waste should only be considered where other waste management options are not available or where it is the best overall environmental outcome.</p>	<p>waste arising from the Scheme. It concludes that there will be no significant effects with regards to waste arising from the Scheme with the implementation of management measures as set out in the Framework CEMP [EN010143/APP/7.7] and Framework DEMP [EN/010143/APP/7.9] as well as a Framework SWMP (Appendix 16-4, ES Volume 2 [EN010143/APP/6.2]).</p> <p>The Scheme aims to prioritise waste prevention, followed by preparing for re-use, recycling and recovery and lastly disposal to landfill as per the waste hierarchy. Waste arisings will be prevented and designed out where practicable. Residual waste will be transported off-site and delivered to the appropriately licenced receivers of such materials.</p> <p>Volumes of waste during construction and decommissioning may also put pressure on the capacity of local waste management facilities. It is proposed that this would be managed through a Construction Resource Management Plan (CRMP), which is secured by the Framework CEMP [EN010143/APP/7.7]. Therefore, effects are not expected to be significant</p>
Paragraph 5.14.4	<p>All large infrastructure projects are likely to generate hazardous and non-hazardous waste. The EA's Environmental Permitting (EP) regime incorporates</p>	<p>Potential sources of waste associated with the Scheme are set out by Section 16.7 of Chapter</p>

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
	operational waste management requirements for certain activities. When an applicant applies to the EA for an Environmental Permit, the EA will require the application to demonstrate that processes are in place to meet all relevant EP requirements	<p>16, Other Environmental Topics of the ES [EN010143/APP/6.1].</p> <p>Should an EP relating to hazardous or non-hazardous waste be required, the Applicant would demonstrate that processes are in place to meet the relevant EP requirements. The Consents and Agreements Position Statement [EN010143/APP/3.3] sets out information on the additional consents and licences that are or may be required to construct and operate the Scheme.</p>
Paragraph 5.14.6	The applicant should set out the arrangements that are proposed for managing any waste produced and prepare a Site Waste Management Plan. The arrangements described and Management Plan should include information on the proposed waste recovery and disposal system for all waste generated by the development, and 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. The app143iodivt should seek to minimise the volume of waste produced and the volume of waste sent for disposal unless it can be demonstrated that this is the best overall environmental outcome	As detailed in Section 16.7 of Chapter 16, Other Environmental Topics of the ES [EN010143/APP/6.1] a Framework SWMP (Appendix 16-4, ES Volume 2 [EN010143/APP/6.2]) has been prepared to ensure recycling and reuse of materials is maximised. A detailed SWMP will be finalised with specific measures to be implemented prior to the start of construction. A SWMP will be prepared during the detailed design of the Scheme. The SWMP will be secured by the DCO. It is not anticipated that there would be a significant effect on waste during the construction operation or decommissioning of the Scheme.
Paragraph 5.14.7	The IPC should consider the extent to which the applicant has proposed an effective system for managing hazardous and non-hazardous waste arising from the construction,	During the construction, operation and decommissioning of the Scheme, the re-use or

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
	<p>operation and decommissioning of the proposed development. It should be satisfied that:</p> <ul style="list-style-type: none"> 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 minimise the volume of waste arisings, and of the volume of waste arisings sent to disposal, except where that is the best overall environmental outcome. 	<p>recycling of materials will be explored before resorting to landfill options.</p> <p>As detailed in Section 16.7 of Chapter 16, Other Environmental Topics of the ES [EN010143/APP/6.1] a Framework SWMP (Appendix 16-4, ES Volume 2 [EN010143/APP/6.2]) has been prepared to ensure recycling and reuse of materials is maximised. A detailed SWMP will be prepared during the detailed design of the Scheme. The SWMP will be finalised with specific measures to be implemented prior to the start of construction. The SWMP will be secured by the DCO. It is not anticipated that there would be a significant effect on waste during the construction operation or decommissioning of the Scheme.</p>
Paragraph 5.14.8	Where necessary, the [Secretary of State] should use requirements or obligations to ensure that appropriate measures for waste management are applied. The [Secretary of State] may wish to include a condition on revision of waste management plans at reasonable intervals when giving consent.	
Paragraph 5.14.9	Where the project will be subject to the EP regime, waste management arrangements during operations will be covered by the permit and the considerations set out in Section 4.10 (Pollution control and other environmental regulatory regimes) will apply	

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
Water Quality and Resources Paragraph 5.15.2	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 as part of the ES or equivalent. (See Section 4.2.)	Chapter 9: Flood Risk, Drainage and water Environment, ES Volume 1 [EN010143/APP/6.1] presents the existing status of the water environment and the likely effects of the Scheme upon it. This concludes that with appropriate mitigation there are considered to be no significant residual effects for surface water, groundwater or flood risk during the construction, operation and decommissioning phases of the Scheme, leading to no significant adverse effects on water quality, water resources or physical characteristics of the water environment.
Paragraph 5.15.3	The ES should in particular describe: <ul style="list-style-type: none">the existing quality of waters affected by the proposed project and the impacts of the proposed project on water quality, noting any relevant existing discharges, proposed new discharges and proposed changes to discharges;existing water resources affected by the proposed project and the impacts of the proposed project on water resources, noting any relevant existing abstraction rates, proposed new abstraction rates and proposed changes to abstraction rates (including any impact on or use of mains supplies and reference to Catchment Abstraction Management Strategies);	Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 [EN010143/APP/6.1] presents a full water environment baseline, including existing water quality based on EA data, water resources, and physical characteristics of the water environment. An impact assessment is undertaken within the chapter covering these elements. A WFD assessment is included in Appendix 9-2, ES Volume 2 [EN010143/APP/6.2] .

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
	<ul style="list-style-type: none"> 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; and any impacts of the proposed project on water bodies or protected areas under the Water Framework Directive and source protection zones (SPZs) around potable groundwater abstractions. 	
Paragraph 5.15.5	The IPC will generally need to give impacts on the water environment more weight where a project would have an adverse effect on the achievement of the environmental objectives established under the Water Framework Directive	A WFD assessment is included in Appendix 9-2, ES Volume 2 [EN010143/APP/6.2]. 8.1 , which concludes that the Scheme would not prevent the achievement of the wider WFD objectives in the Humber RBMP and is not predicted to have an impact on any other water body within the Humber RBD or mitigation measures developed to achieve Good status.
Paragraph 5.15.6	The IPC should satisfy itself that a proposal has regard to the River Basin Management Plans and meets the requirements of the Water Framework Directive (including Article 4.7) and its daughter directives, including those on priority substances and groundwater. The specific objectives for particular river basins are set out in River Basin Management Plans. The IPC should also consider the interactions of the proposed project with other plans such as Water Resources Management Plans and Shoreline/Estuary management Plans	A WFD assessment is included in Appendix 9-2, ES Volume 2 [EN010143/APP/6.2] . Chapter 9: Flood Risk, Drainage and water Environment, ES Volume 1 [EN010143/APP/6.1] takes into account the Humber River Basin District River Basin Management Plan.

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Proposed Development compliance
Paragraph 5.15.8	The IPC should consider whether mitigation measures are needed over and above any which may form part of the project application. (See Sections 4.2 and 5.1.) A construction management plan may help codify mitigation at that stage.	Mitigation measures during the construction of the Scheme will be according to best practice that are included within the Framework CEMP [EN010143/APP/7.7] .

1.2 Table 2 National Policy Statement for Renewable Energy Infrastructure (EN-3)

NPS EN-3 Relevant Paragraph	NPS EN-3 Detail	NPS EN-3 Proposed Development compliance
Introduction		
Paragraph 1.1.1	Electricity generation from renewable sources of energy is an important element in the Government's development of a low-carbon economy. There are ambitious renewable energy targets in place and a significant increase in generation from large-scale renewable energy infrastructure is necessary to meet the 15% renewable energy target (see Section 3.4 of EN-1).	<p>Statement of Need [EN010143/APP/7.1] and Section 5 of the Planning Statement explain that the Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure and low-carbon electricity both during and beyond the critical 2020s timeframe. Maximising the capacity of generation in the resource-rich, well-connected and technically deliverable proposed location for the Scheme, represents a significant and economically rational step forwards in the fight against the global climate emergency.</p> <p>Its proposed National Electricity Transmission System (NETS) connection means that it would play its part in helping National Grid ESO (NGESO) manage the national electricity system to ensure security of supply and bring cost benefits to electricity consumers, both of which are identified in government policy as being required for resilient energy supplies in the future.</p> <p>Given the age of the policy, the targets set in EN-3 are now out of date and do not reflect the high targets set in more recent energy policy. Nevertheless, the meaningful and timely</p>

**NPS EN-3
Relevant Paragraph**

**NPS EN-3
Detail**

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Proposed Development compliance**

		<p>contributions offered by the Scheme to UK decarbonisation and security of supply, while helping lower bills for consumers throughout its operational life, support delivery of targets set in EN-3.</p>
<p>Paragraph 2.3.1</p>	<p>Part 2 of EN-1 covers the Government's energy and climate change strategy, including policies for mitigating climate change. It refers to Section 4.8 of EN-1 which sets out generic considerations that applicants and the IPC should take into account to help ensure that renewable energy infrastructure is resilient to climate change.</p>	<p>Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1] sets out an assessment of the Scheme in relation to Climate Change, including measures it has taken to ensure it is resilient to climate change.</p> <p>The ES for the Scheme includes an FRA that takes into account climate change. Refer to Appendix 9-3, ES Volume 2 [EN010143/APP/6.2].</p> <p>In-combination Climate Change Impact (ICCI) assessment is also included in the ES in Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1].</p>
<p>Paragraph 2.4.2</p>	<p>Proposals for renewable energy infrastructure should demonstrate good design in respect of landscape and visual amenity, and in the design of the project to mitigate impacts such as noise and effects on ecology</p>	<p>As detailed in the Design and Access Statement [EN010143/APP/7.3], the Scheme has been subject to a detailed and sensitive iterative design process. This has taken account of the context and features of the land within the Order limits, nearby sensitive receptors and assets, information emerging from environmental surveys, feedback from stakeholders, and opportunities and constraints in order to develop a good design that balances the need to maximise the energy</p>

**NPS EN-3
Relevant Paragraph**

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Detail**

**NPS EN-3
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generation capacity of the Scheme, with the avoidance and mitigation of impacts, and provision of environmental and other enhancements, where practicable. The design process, objectives and principles are described in **Design and Access Statement [EN010143/APP/7.3]** and **Design Principles Statement [EN010143/APP/7.4]**.

1.3 Table 3 National Policy Statement for Electricity Networks Infrastructure (EN-5)

NPS EN-5 Relevant Paragraph	Detail	NPS EN-5 Proposed Development compliance
Factors Influencing Site Selection by Applicants		
Paragraph 2.2.5	There will usually be some flexibility around the location of the associated substations and applicants will give consideration to how they are placed in the local landscape taking account of such things as local topography and the possibility of screening. See Section 2.8 below and Section 5.9 in EN-1.	<p>The applicant wishes to retain flexibility regarding the design detail of certain components of the Scheme. The extent of flexibility required is described in Chapter 2: The Scheme, ES Volume 1 [EN010143/APP/6.1] and set out in the Design Principles Statement [EN010143/APP/7.4] and Design and Access Statement [EN010143/APP/7.3].</p> <p>The key focus of Objective 2 of the Design and Access Statement [EN010143/APP/7.3] is to ensure the Scheme responds sensitively to the landscape. Landscape was a key factor in the layout and design of the Scheme. The design has evolved to reduce the impacts on landscape features including the incorporation of buffers from woodland/hedgerows, PRow and water courses.</p> <p>The substations were originally located in Solar PV Areas 3a and 1c. Following statutory consultation, both substations are now located within area 1c. The location of the substations was informed by flood mapping as detailed in Chapter 3: Alternatives and Design Evolution [EN010143/APP/6.1]. The location of the</p>

**NPS EN-5
Relevant Paragraph**

Detail

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substations was changed in direct response to flood reliance considerations as well as responding to consultation responses.

General Assessment for Electricity Networks

Paragraph 2.3.5

The IPC should also take into account that National Grid, as the owner of the electricity transmission system in England and Wales, as well as Distribution Network Operators (DNOs), are required under section 9 of the Electricity Act 1989 to bring forward efficient and economical proposals in terms of network design, taking into account current and reasonably anticipated future generation demand. National Grid is also required to facilitate competition in the supply and generation of electricity and so has a statutory duty to provide a connection whenever or wherever one is required.

The Applicant has secured a connection to the National Grid via a new below ground grid connection cable located within the Grid Connection Route. This will connect the new substation to the National Grid Drax Substation. Further details of this are included in the **Grid Connection Statement [EN101043/APP/7.5]**.

Climate Change Adaption

Paragraph 2.4.1

Part 2 of EN-1 provides information regarding the Government's energy and climate change strategy including policies for mitigating climate change. Section 4.8 of EN-1 sets out the generic considerations that applicants and the IPC should take into account to help ensure that electricity networks infrastructure is resilient to climate change. 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

The majority of the electricity networks infrastructure associated with the Scheme is underground and is consequently highly unlikely to be affected by flooding or any similar effects of climate change.

Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1] assesses the resilience of the Scheme to climate change, including increased risk of flooding, as required by this policy.

NPS EN-5 Relevant Paragraph	Detail	NPS EN-5 Proposed Development compliance
	<p>vulnerable, and, as appropriate, how it would be resilient to:</p> <ul style="list-style-type: none"> • flooding, particularly for substations that are vital for the electricity transmission and distribution network; • effects of wind and storms on overhead lines; • higher average temperatures leading to increased transmission losses; and • earth movement or subsidence caused by flooding or drought (for underground cables). 	<p>Chapter 6, ES Volume 1 [EN010143/APP/6.1] assesses the Scheme’s vulnerability to climate change, considering the embedded mitigation measures that have been designed into the Scheme. These assessments conclude that with mitigation the Scheme is resilient to climate change including increased risk of flooding.</p>
<p>Paragraph 2.4.2</p>	<p>Section 4.8 of EN-1 advises that the resilience of the project to climate change should be assessed in the Environmental Statement (ES) accompanying an application. For example, future increased risk of flooding would be covered in any flood risk assessment (see Section 5.7 in EN-1).</p>	<p>Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1] assesses the resilience of the Scheme to climate change, including increased risk of flooding, as required by this policy.</p> <p>The ES for the Scheme includes an FRA that takes into account climate change. Refer to Appendix 9-3, ES Volume 2 [EN010143/APP/6.2].</p> <p>In-combination Climate Change Impact (ICCI) assessment is also included in the ES in Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1].</p>
Consideration of Good Design		
<p>Paragraph 2.5.2</p>	<p>Proposals for electricity networks infrastructure should demonstrate good design in their approach to mitigating the potential adverse impacts which can be associated</p>	<p>No overhead lines are proposed as part of the Scheme.</p>

**NPS EN-5
Relevant Paragraph**

Detail

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with overhead lines, particularly those set out in Sections 2.7 to 2.10 below.

Landscape and Visual

Paragraph 2.8.8

Paragraph 3.7.10 of EN-1 sets out the need for new electricity lines of 132kV and above, including overhead lines. Although Government expects that fulfilling this need through the development of overhead lines will often be appropriate, it recognises that there will be cases where this is not so.

Where there are serious concerns about the potential adverse landscape and visual effects of a proposed overhead line, the IPC will have to balance these against other relevant factors, including the need for the proposed infrastructure, the availability and cost of alternative sites and routes and methods of installation (including undergrounding).

All cables within the scheme will be buried and will therefore have no adverse landscape and visual effects.

Noise and Vibration

Paragraph 2.9.7

Audible noise effects can also arise from substation equipment such as transformers, quadrature boosters and mechanically switched capacitors. Transformers are installed at many substations, and generate low frequency hum. Whether the noise can be heard outside a substation depends on a number of factors, including transformer type and the level of noise attenuation present (either engineered intentionally or provided by other structures).

Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1] has assessed the impacts of all aspects of the Scheme including substations in accordance with this policy.

The Scheme's design incorporates a distance of 250 m between residential receptors and noise emitting field stations and grid connection substations, except for one sensitive receptor, where a buffer of 350 m from field stations and Grid Connection Substations is committed.

**NPS EN-5
Relevant Paragraph**

Detail

Paragraph 2.9.10

The IPC should ensure that relevant assessment methodologies have been used in the evidence presented to them, 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.

**NPS EN-5
Proposed Development compliance**

Section 11.6 of Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1] outlines the mitigation measures embedded into the design of the Scheme.

Section 11.8 of Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1] outlines the additional mitigation measures proposed.

The construction noise assessments presented in **Section 11.7 of Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1]** include the assessment of noise resulting from road and rail traffic movements generated during construction. Traffic during the operational period will be negligible. It concludes that no significant noise or vibration effects are predicted during the operational phase.

Significant effects are anticipated during construction from night-time HDD activities at the Grid Connection Corridor and the Interconnecting Cable Corridor. It should be noted that identification of likely significant effects is precautionary based on the worst-case assumption that 24-hour HDD working would be required. These effects would only occur during construction and would be mitigated through a communication strategy and noise complaint system which will be secured through the DCO as

**NPS EN-5
Relevant Paragraph**

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part of the **Framework CEMP [EN010143/APP/7.7]** and detailed CEMP (a requirement of the DCO).

Electric and Magnetic Fields

Paragraph 2.10.12

Undergrounding of a line would reduce the level of EMFs experienced, but high magnetic field levels may still occur immediately above the cable. It is not the Government's policy that power lines should be undergrounded solely for the purpose of reducing exposure to EMFs. Although there may be circumstances where the costs of undergrounding are justified for a particular development, this is unlikely to be on the basis of EMF exposure alone, for which there are likely to be more cost-efficient mitigation measures.

Electric and Electro-Magnetic Fields have been considered within **Section 16.8 of Chapter 16: Other Environmental Topics, ES Volume 1 [EN010143/APP/6.1]**. This section concludes that no significant effects are predicted to occur.

Paragraph 2.10.13

In order to avoid unacceptable adverse impacts of EMFs from electricity network infrastructure on aviation, the IPC should take account of statutory technical safeguarding zones defined in accordance with Planning Circular 01/03, or any successor when considering applications. More detail on this issue can be found in Section 5.4 of EN-1. 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.

**NPS EN-5
Relevant Paragraph**

Detail

**NPS EN-5
Proposed Development compliance**

Paragraph 2.10.15

The applicant should have considered 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 effects of EMFs; and
- any new advice emerging from the Department of Health relating to Government policy for EMF exposure guidelines.
- However, where it can be shown that the line will comply with the current public exposure guidelines and the policy on phasing, no further mitigation should be necessary.

Electric and Electro-Magnetic Fields have been considered within **Section 16.8 of Chapter 16: Other Environmental Topics, ES Volume 1 [EN010143/APP/6.1]**.

There are no residential properties within the Order limits. The nearest properties to the Order limits are at least 5 m away and it is unlikely cables will be installed that close to any property due to the need for construction vehicles to manoeuvre both sides of the trench within the working width. Therefore, no significant effects to residential receptors are predicted to occur.

Some PRoW do cross over the proposed Interconnecting and Grid Connection Cable Corridors, and may also pass over the Interconnecting and Grid Connection Cables where they are routed within the Solar PV Site. It is considered that the level of exposure to users of PRoW would be similar to that associated with general household appliances (and noticeably less than associated with the exposure when using a vacuum cleaner). Therefore, no significant effects to users of PRoW are predicted to occur.

Paragraph 2.10.16

Where EMF exposure is within the relevant public exposure guidelines, re-routing a proposed overhead line purely on the basis of EMF exposure, or undergrounding a line solely to further reduce the level of EMF exposure are unlikely to be proportionate mitigation measures.

1.4 Table 4 Draft Overarching National Policy Statement for Energy (EN-1)

Draft NPS EN-1 Relevant Paragraph	Draft NPS EN-1 Detail	Draft NPS EN-1 Proposed Development compliance
Paragraph 2.1.2	To produce enough energy required for the UK and ensure it can be transported to where it is needed, a significant amount of infrastructure is needed at both local and national scale. High quality infrastructure is crucial for economic growth, boosting productivity and competitiveness. Part 3 of this NPS provides further details on the need for and importance of energy to economic prosperity and social well-being.	<p>As set out in the Statement of Need [EN010143/APP/7.1] the Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure and low-carbon electricity both during and beyond the critical 2020s timeframe. Maximising the capacity of generation in the resource-rich, well-connected and technically deliverable proposed location for the Scheme, represents a significant and economically rational step forwards in the fight against the global climate emergency.</p> <p>The Scheme would contribute to an adequate and dependable UK energy generation mix, through enabling the generation of more low-carbon power from indigenous and renewable resources.</p> <p>The Scheme would provide a number socio-economic benefits, including:</p> <p>Electricity Generation - Over the 40-year lifetime of the Scheme, it would generate enough electricity to power approximately 147,222 homes based on Ofgem data. This is a significant increase in electricity generation with recognition that more electricity generation is needed to meet demand.</p>

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Decarboni–ation - The Scheme indicates an overall lifetime carbon reduction, relative to the counterfactual Combined Cycle Gas Turbine (CCGT), of over 5.5 million tCO₂e. The overall greenhouse gas impact of the Scheme is therefore beneficial and significant, as it will play a part in achieving the rate of transition required by nationally set policy commitments and supporting the trajectory towards Net Zero.

Environmental Benefits – The Scheme would provide a number of ecological enhancements through its landscape design. The Scheme would also provide soil improvements as a result of the change from arable farming to grassland. These measures are set out in full in the **Framework LEMP [EN010143/APP/7.14]**. The Applicant is committed to exceeding the Government’s 10% target for biodiversity net gain as set out in the Environment Act 2021. A **Biodiversity Net Gain (BNG) report [EN010143/APP/6.2]** demonstrates that the Scheme has the potential to deliver significant biodiversity net gain on the Site, with 80% gain predicted for habitat biodiversity units.

Permissive Paths – Two permissive paths would be provided as part of the Scheme which would provide access to the local population to open space, having a beneficial impact on health and wellbeing.

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Economic Benefits – The Scheme would result in 401 net jobs per annum during construction and would contribute to the development of skills needed for the UK's transition to Net Zero by 2050 and described within the Net Zero Strategy: Building Back Greener. It is also estimated that the construction of the Scheme would contribute approximately £22.5 million to the national economy, of which £10.1m would likely be within the local area.

Design

Paragraph 2.2.1

In June 2019, the UK became the first major economy to legislate for a 2050 net zero Greenhouse Gases ('GHG') emissions target through the Climate Change Act 2008 (2050 Target Amendment) Order 2019. In December 2020, the UK communicated its Nationally Determined Contributions to reduce GHG emissions by at least 68 per cent from 1990 levels by 2030.¹⁹ In April 2021, the government legislated for the sixth carbon budget (CB6), which requires the UK to reduce GHG emissions by 78 per cent by 2035 compared to 1990 levels.

The **Statement of Need [EN010143/APP/7.1]** and Section 5 of the Planning Statement explain that the Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure and low-carbon electricity both during and beyond the critical 2020s timeframe. Maximising the capacity of generation in the resource-rich, well-connected and technically deliverable proposed location for the Scheme, represents a significant and economically rational step forwards in the fight against the global climate emergency.

Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1] presents a lifecycle greenhouse gas (GHG) impact assessment over the lifetime of the Scheme. It concludes that

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Paragraph 2.3.3

Our objectives for the energy system are to ensure our supply of energy always remains secure, reliable, affordable, and consistent with meeting our target to cut GHG emissions to net zero by 2050, including through delivery of our carbon budgets and NDC. This will require a step change in the decarbonisation of our energy system

The **Statement of Need [EN010143/APP/7.1]** and Section 5 of the Planning Statement explain that the Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure and low-carbon electricity both during and beyond the critical 2020s timeframe. Maximising the capacity of generation in the resource-rich, well-connected and technically deliverable proposed location for the Scheme, represents a significant and economically rational step forwards in the fight against the global climate emergency.

The Scheme, as a leading large-scale solar scheme in the UK, represents approximately 2%

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Paragraph 2.3.4

Meeting these objectives necessitates a significant amount of energy infrastructure, both large and small-scale. This includes the infrastructure needed to convert primary sources of energy (e.g. wind) into energy carriers (e.g. electricity or hydrogen), and to store and transport these energy carriers into and around the country. It also includes the infrastructure needed to capture, transport and store carbon dioxide. The requirement for new energy infrastructure will present opportunities for the UK and contributes towards our ambition to support jobs in the UK's clean energy industry and local supply chains

of the additional solar generation capacity required in the future energy scenarios projections to 2030, for scenarios compatible with net zero only. In this context, the Scheme is therefore an essential stepping stone towards the future of efficient decarbonisation through the deployment of large-scale, technologically and geographically diverse low-carbon generation assets.

The **Statement of Need [EN010143/APP/7.1]** and Section 5 of the Planning Statement explain that the Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure and low-carbon electricity both during and beyond the critical 2020s timeframe. Maximising the capacity of generation in the resource-rich, well-connected and technically deliverable proposed location for the Scheme, represents a significant and economically rational step forwards in the fight against the global climate emergency.

Chapter 12: Socio Economics and Land Use, ES Volume 1 [EN010143/APP/6.1] states that during construction, the Scheme will support, on average, 401 total net jobs per annum. Of these, 181 jobs per annum are expected to be taken up by residents within the local area.

Draft NPS EN-1 Relevant Paragraph	Draft NPS EN-1 Detail	Draft NPS EN-1 Proposed Development compliance
Paragraph 2.3.5	The sources of energy we use will also need to change. Today, our energy system is dominated by fossil fuels. Although representing a record low, fossil fuels still accounted for just over 76 per cent of energy supply in 2020. We will need to dramatically increase the volume of energy supplied from low carbon sources and reduce the amount provided by fossil fuels.	This policy notes the need to dramatically increase the volume of energy supplied from low carbon sources, requiring a large amount of low carbon electricity generation as proposed as part of the Scheme.
Paragraph 2.3.7	...Using electrification to reduce emissions in large parts of transport, heating and industry could lead to more than half of final energy demand being met by electricity in 2050, up from 17 per cent in 2019, representing a doubling in demand for electricity.	This policy emphasises that in addition to the need to decarbonise existing electricity supplies, a dramatic increase is needed in the total electricity generated to enable decarbonisation across all sectors. This again emphasises the scale of low carbon electricity generation necessary to meet these targets. The Scheme will generate a large amount of low carbon electricity to contribute to meeting this need.
Paragraph 3.1.1	This Part of the NPS explains why the government sees a need for significant amounts of new large-scale energy	These policies recognise that there are expected to be significant residual adverse impacts

Draft NPS EN-1 Relevant Paragraph	Draft NPS EN-1 Detail	Draft NPS EN-1 Proposed Development compliance
	<p>infrastructure to meet its energy objectives. However, as noted in Section 1.7, it will not be possible to develop the necessary amounts of such infrastructure without some significant residual adverse impacts.</p>	<p>associated with large scale energy infrastructure. A summary of environmental effects is found within Chapter 18: Summary of Environmental Effects, ES Volume 1 [EN010143/APP/6.1]</p>
<p>Paragraph 3.1.2</p>	<p>However, as noted in Section 1.7, 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.</p>	<p>Overall, with appropriate mitigation implemented, this identifies a relatively limited number of residual significant adverse effects of the Scheme. When considered relative to the large-scale nature of the Scheme these effects are considered to be relatively limited and outweighed by the significant national benefits that the Scheme will provide by providing much needed large scale renewable energy generation.</p> <p>The Applicant notes that, in accordance with this policy, the need for infrastructure such as the Scheme is urgent and the SoS should give substantial weight to this need in decision-making on the Application.</p>
<p>Paragraph 3.2.4</p>	<p>It is for industry to propose new energy infrastructure projects within the strategic framework set by government. 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.</p>	<p>It should be noted that Draft NPS EN-1 emphasises that there are no policy limits set for different technologies. Presence of additional low carbon Schemes in the area or elsewhere should not, therefore, affect the demonstrable need for the Scheme.</p>
<p>Paragraph 3.2.5</p>	<p>The Secretary of State should therefore assess all applications for development consent for the types of</p>	<p>The Applicant notes that, in accordance with this policy, the need for infrastructure such as the</p>

Draft NPS EN-1 Relevant Paragraph	Draft NPS EN-1 Detail	Draft NPS EN-1 Proposed Development compliance
	<p>infrastructure covered by the energy NPSs 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.</p>	<p>Scheme is acknowledged and is urgent. Given that this policy is not yet designated, a Statement of Need [EN010143/APP/7.1], is submitted with the Application clearly setting out the need for the project. However, it is considered to be an important and relevant matter that emerging policy considers this need to be demonstrated.</p>
<p>Paragraph 3.2.6</p>	<p>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.</p>	<p>This policy further emphasises that the SoS should give substantial weight to the need for new energy infrastructure when determining applications for development consent.</p>
<p>Paragraph 3.2.7</p>	<p>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</p>	<p>Given that this policy is not yet designated, a Statement of Need [EN010143/APP/7.1] is submitted with the Application clearly setting out the need for the project. However, it is considered to be an important and relevant matter that emerging policy considers this need to be demonstrated.</p>
<p>Paragraph 3.3.3</p>	<p>To ensure that there is sufficient electricity to meet demand, new electricity infrastructure will have to be built to replace output from retiring plants and to ensure we can meet increased demand. Our analysis suggests that even with major improvements in overall energy efficiency, and increased flexibility in the energy system, demand for electricity is likely to increase significantly over the coming years and could more than double by 2050 as large parts of transport, heating and industry decarbonise by switching from fossil fuels to low carbon electricity. The Impact Assessment for CB6 shows an</p>	<p>As explained in the Statement of Need [EN010143/APP/7.1] and Section 5 of the Planning Statement the Scheme will help meet the demand for energy which is expected to rise substantially in the future.</p>

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Paragraph 3.3.12	<p>illustrative range of 465-515TWh in 2035 and 610-800TWh in 2050.</p> <p>Decentralised and community energy systems such as micro-generation contribute to our targets on reducing carbon emissions and increasing energy security. These technologies could also lead to some reduction in demand on the main generation and transmission system. However, the government does not believe they will replace the need for new large-scale electricity infrastructure to meet our energy objectives. This is because connection of large-scale, centralised electricity generating facilities via a high voltage transmission system enables the pooling of both generation and demand, which in turn offers a number of economic and other benefits, such as more efficient bulk transfer of power and enabling surplus generation capacity in one area to be used to cover shortfalls elsewhere.</p>	<p>This policy clearly sets out that while decentralised and community energy schemes such as rooftop solar, can contribute to targets, it will not replace the need for new large-scale electricity infrastructure.</p> <p>As also explained in the Statement of Need [EN010143/APP/7.1], this policy acknowledges that large scale electricity generation facilities are needed. The Scheme would connect directly to the NETS, to enable the transfer of the electricity it generates over a wide geographical area, as per this policy.</p> <p>The Scheme should be considered on the basis that its need is established and this established and urgent need should be given substantial weight in the decision.</p>
Paragraph 3.3.13	<p>The Net Zero Strategy³⁵ 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 clear the commitment that the cost of the transition to net zero should be fair and affordable.</p>	<p>As set out in the Statement of Need [EN010143/APP/7.1], 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</p>

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		<p>affordability aims, to the benefit of electricity consumers.</p> <p>The Statement of Need [EN010143/APP/7.1] sets out that due to technological advances, solar facilities are already among the cheapest form of electricity generation in the UK and Government forecasts indicate that costs will continue to reduce in the future. Solar power is economically attractive in the UK against many other forms of conventional and renewable generation.</p>
Paragraph 3.3.16	<p>If demand 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 Net Zero Strategy³⁷ to take action so that by 2035, All our electricity will come from low carbon sources, subject to security of supply, 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.</p>	<p>The Statement of Need [EN010143/APP/7.1] and Section 5 of the Planning Statement explain that the Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure and low-carbon electricity both during and beyond the critical 2020s timeframe. Maximising the capacity of generation in the resource-rich, well-connected and technically deliverable proposed location for the Scheme, represents a significant and economically rational step forwards in the fight against the global climate emergency.</p>
Paragraph 3.3.19	<p>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 in 2050 for a wide range of demand, decarbonisation, and technology scenarios.</p>	<p>As explained in the Statement of Need [EN010143/APP/7.1], large scale solar is expected to be an important part of the diverse energy mix that this policy sets out is needed</p>

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Paragraph 3.3.20

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.

This policy emphasises that solar is also one of the lowest cost ways of generating electricity and that solar is one of the predominant technologies anticipated to produce electricity by 2050. The Scheme is therefore strongly supported by both the need for decarbonised grid and affordable energy supplies.

The cost of solar generation is already super-competitive against the cost of other forms of conventional and low-carbon generation, both in locally and more widely. Internationally there is the ongoing trend of solar generation assets becoming larger and more affordable, each subsequent project providing a real-life demonstration that solar schemes of similar size and scale as the Scheme can be developed locally. The development of such schemes will provide decarbonisation and commercial benefits to consumers. Single large-scale 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 reductions and more affordable electricity, in line with government policy.

Paragraph 3.3.56

All the generating technologies mentioned above are urgently needed to meet the Government's energy objectives by:

The technologies mentioned above in the Draft NPS EN-1 include solar development so this paragraph further reconfirms the need for solar projects, including the Scheme.

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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)

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The **Statement of Need [EN010143/APP/7.1]** and Section 5 of the Planning Statement explain that the Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure and low-carbon electricity both during and beyond the critical 2020s timeframe. Maximising the capacity of generation in the resource-rich, well-connected and technically deliverable proposed location for the Scheme, represents a significant and economically rational step forwards in the fight against the global climate emergency.

As part of a diverse generation mix, solar generation contributes to improve the stability of capacity utilisations among renewable generators. When developed alongside other renewable technologies, large-scale solar will smooth out seasonal variations in total GB renewable generation, more closely matching anticipated seasonal levels of demand. Other conventional low-carbon generation (e.g. tidal, nuclear or conventional carbon with CCUS) remain important contributors to achieving the 2050 Net Zero obligation, but their contributions in the important 2020s will be very low.

As per paragraph 3.2.6, the Scheme should be considered on the basis that its need is

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Paragraph 3.3.57	Known generation technologies that are included within the scope of this NPS (and would be classed as an NSIP if above the relevant capacity thresholds set out under the Planning Act 2008) include: ... Solar PV.	established and this established and urgent need should be given substantial weight in the decision. This confirms that solar PV generation facilities, such as the Scheme, are covered by the emerging suite of draft Energy NPSs and are urgently required.
Paragraph 3.3.58	The need for all these types of infrastructure is established by this NPS and is urgent.	As per paragraph 3.2.6, the Scheme should be considered on the basis that its need is established and this urgent need should be given substantial weight in the decision on the Application.
Paragraph 3.3.63	There is an urgent need for new electricity network infrastructure to meet our energy objectives.	Solar technology is one of the quickest and cheapest technologies to deploy. In line with paragraph 3.3.20 the Scheme can directly respond to the urgent need to deliver a large amount of renewable generation capacity quickly. Subject to obtaining the necessary consents, construction is anticipated to commence in 2025 and be completed ready for operation in 2027.
Paragraph 3.3.79	Government has committed to reduce GHG emissions by 78 per cent by 2035 under carbon budget 6. According to the Net Zero Strategy this means that by 2035, all our electricity will need to come from low carbon sources, subject to security of supply, whilst meeting a 40-60 per cent increase in demand	The Statement of Need [EN010143/APP/7.1] and Section 5 of the Planning Statement explain that the Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure and low-carbon electricity both during and beyond the critical 2020s timeframe. Maximising the capacity of generation in the resource-rich, well-connected and technically deliverable proposed location for

Draft NPS EN-1 Relevant Paragraph	Draft NPS EN-1 Detail	Draft NPS EN-1 Proposed Development compliance
Paragraph 3.3.80	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.	the Scheme, represents a significant and economically rational step forwards in the fight against the global climate emergency.
Paragraph 3.3.81	It is not the government’s intention in presenting any of the figures or targets in this NPS to propose limits on any new electricity infrastructure that can be consented in accordance with the energy NPSs.	The Scheme has great potential to deliver a substantial amount of low carbon electricity in a short timescale, with the potential to be operational by 2027. Therefore, consent on low carbon schemes, like that proposed at East Yorkshire Solar Farm, that are compliant with policy and can be delivered urgently should be granted without delay.
Paragraph 3.3.82	It is not the role of the planning system to deliver specific amounts or limit any form of electricity infrastructure covered by this NPS.	This policy again emphasises that there is no limit on new electricity infrastructure that can be consented in accordance with the energy NPSs and that a large number of projects can be consented and deliver an affordable electricity system.
Paragraph 3.3.83	A large number of consented projects can help deliver an affordable electricity system, by driving competition and reducing costs within and amongst different technology and infrastructure types. Consenting new projects also	This policy again emphasises that there is no limit on new electricity infrastructure that can be consented in accordance with the energy NPSs and that a large number of projects can be consented and deliver an affordable electricity system.

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	enables projects utilising more advanced technology and greater efficiency to come forward	consented and deliver an affordable electricity system.
Assessment Principles		
Paragraph 4.1.5	<p>In considering any proposed development, in particular when weighing its adverse impacts against its benefits, the Secretary of State should take into account:</p> <ul style="list-style-type: none"> - its potential benefits including its contribution to meeting the need for energy infrastructure, job creation, reduction of geographical disparities, environmental enhancements, and any long-term or wider benefits -its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy 	<p>The Applicant has produced a suite of documents that are submitted with this Application, that have assessed the adverse impacts of the Scheme, as well as the benefits it will bring.</p> <p>Section 5.3 of this Planning Statement sets out the benefits of the Scheme. Along with contributing to a sufficient, reliable and affordable energy system whilst helping the Government decarbonise, and meet national climate change targets and budgets, the Scheme provides a number of other benefits which are set out below.</p> <p>Electricity Gene–ation - Over the 40-year lifetime of the Scheme, it would generate enough electricity to power approximately 147,222 homes based on Ofgem data. This is a significant increase in electricity generation with recognition that more electricity generation is needed to meet demand.</p> <p>Decarboni–ation - The Scheme indicates an overall lifetime carbon reduction, relative to the counterfactual Combined Cycle Gas Turbine (CCGT), of over 5.5 million tCO₂e. The overall greenhouse gas impact of the Scheme is therefore beneficial and significant, as it will play a part in</p>

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achieving the rate of transition required by nationally set policy commitments and supporting the trajectory towards Net Zero.

Environmental Benefits – The Scheme would provide a number of ecological enhancements through its landscape design. The Scheme would also provide soil improvements as a result of the change from arable farming to grassland. These measures are set out in full in the **Framework LEMP [EN010143/APP/7.14]**. The Applicant is committed to exceeding the Government's 10% target for biodiversity net gain as set out in the Environment Act 2021. A **Biodiversity Net Gain (BNG) report [EN010143/APP/6.2]** demonstrates that the Scheme has the potential to deliver significant biodiversity net gain on the Site, with 80% gain predicted for habitat biodiversity units.

Permissive Paths – Two permissive paths would be provided as part of the Scheme which would provide access to the local population to open space, having a beneficial impact on health and wellbeing.

Economic Benefits – The Scheme would result in 401 net jobs per annum during construction and would contribute to the development of skills need for the UK's transition to Net Zero by 2050 and described within the Net Zero Strategy: Building Back Greener. It is also estimated that the

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construction of the Scheme would contribute approximately £22.5 million to the national economy, of which £10.1m would likely be within the local area.

The adverse impacts of the 'chem' are set out in the relevant chapters and appendices of the **ES [EN010143/APP/6.1/6.2/6.3]**. A summary of environmental effects is found within **Chapter 18: Summary of Environmental Effects, ES Volume 1 [EN010143/APP/6.1]**. Overall, with appropriate mitigation implemented, this identifies a relatively limited number of residual significant adverse effects, on landscape and visual, transport and noise. When considered relative to the large-scale nature of the Scheme these effects are considered to be relatively limited and outweighed by the significant national benefits that the Scheme will provide by providing much needed large scale renewable energy generation, and more localised benefits as set out above.

Paragraph 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.

The environmental, social and economic benefits of the Scheme are set out in Section 5.3 of this Planning Statement. The adverse impacts of the Scheme are set out in the relevant chapters and appendices of the **ES [EN010143/APP/6.1/6.2/6.3]**. These take account of impacts and benefits at national, regional and local levels.

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Paragraph 4.2.1	All proposals for projects that are subject to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) must be accompanied by an Environmental Statement (ES) describing the aspects of the environment likely to be significantly affected by the project	An Environmental Statement (ES) [EN0101043/APP/6.1] and accompanying appendices [EN0101043/APP/6.2], figures [EN0101043/APP/6.3], non-technical summary [EN010143/APP/6.4] and Environment Mitigation and Commitments Register [EN0101043/APP/6.5] have been submitted with this Application. These describe the aspects of the environment likely to be significantly affected by the Scheme.
Paragraph 4.2.5	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 [EN010143/APP/6.1/6.2/6.3] covers the environmental, social and economic effects arising from pre-construction, construction, operation and decommissioning of the Scheme.
Paragraph 4.2.10	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 ES [EN010143/APP/6.1/6.2/6.3] meets the requirements of the EIA Regulations, and provides information proportionate to the scheme of the Scheme.
Alternatives		
Paragraph 4.2.9	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 HRA sites.	There is no general requirement from a policy perspective to consider alternatives or to establish whether the Scheme represents the 'best option'. This Planning Statement [EN010143/APP/7.2], and the Design and Access Statement [EN010143/APP/7.3] sets out how the Scheme accords with policies and legislation where consideration of alternatives may be relevant, such as flood risk and explains how the Scheme

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has taken account of the locational criteria for solar farms that is set out in relevant policies.

In addition, **Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1]** sets out information in relation to alternatives that is required by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and, as a matter of fact, includes information about the main alternatives studied. Due to the location of the development and limited impacts, there is no potential for impacts to sites protected under the Habitats Directive, no requirement to consider alternatives due to biodiversity effects (there are no likely significant adverse effects on biodiversity) and no potential for development within nationally designated landscapes.

The Order limits are however located partially within the Environment Agency's (EA) fluvial Flood Zone 2 and fluvial Flood Zone 3 and the Order limits include areas of land which are also at medium and high risk of surface water flooding. Therefore, a consideration of alternatives to meet the flood risk sequential test policy requirement is set out in **Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1]**. A Flood Risk Assessment **Appendix 9-3, ES Volume 2 [EN010143/APP/6.2]** is also provided with the Application, which comprises a

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		<p>Sequential Test Report (Annex to Appendix 9-3, ES Volume 2 [EN010143/APP/6.2]) further setting out how the Scheme has considered alternatives in relation to flood risk and provides further information on how flood risk is managed. Therefore, the Application satisfies all requirements to consider alternatives related to flood risk.</p>
Paragraph 4.2.15	Applicants are obliged to include in their ES, information about the reasonable alternatives they have studied. This should include an indication of the main reasons for the applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility.	There is no general requirement from a policy perspective to consider alternatives or to establish whether the Scheme represents the 'best option'. The Planning Statement [EN010143/APP/7.2] sets out how the Scheme accords with policies and legislation where consideration of alternatives may be relevant, such as flood risk and explains how the Scheme has taken account of the locational criteria for solar farms that is set out in relevant policies.
Paragraph 4.2.17	Where there is a policy or legal requirement to consider alternatives, the applicant should describe the alternatives considered in compliance with these requirements.	
Paragraph 4.2.21	<p>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:</p> <ul style="list-style-type: none"> • the consideration of alternatives in order to comply with policy requirements should be carried out in a proportionate manner • only alternatives that can meet the objectives of the proposed development need to be considered 	<p>Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1] sets out information in relation to alternatives that is required by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and, as a matter of fact, includes information about the main alternatives studied. The Habitats Regulations Assessment [EN010143/APP/7.12] confirms there is no requirement to consider alternatives due to biodiversity effects. There is no</p>

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Paragraph 4.2.22	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	potential for development within nationally designated landscapes. The Order limits are however located partially within the Environment Agency's (EA) fluvial Flood Zone 2 and fluvial Flood Zone 3 and the Order limits include areas of land which are also at medium and high risk of surface water flooding.
Paragraph 4.2.23	The Secretary of State should not refuse an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site, and it should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals	Therefore consideration of alternatives to meet the flood risk sequential test policy requirement is set out in section 3.4 and section 3.7 Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1]. A Flood Risk Assessment is provided with the Application in Appendix 9-3, ES Volume 2 [EN010143/APP/6.2] which includes the Sequential Test Report at Annex C and provides further information on the sequential test and alternatives considered. Therefore, the Application satisfies all requirements to consider alternatives related to flood risk.
Paragraph 4.2.24	Alternatives not among the main alternatives studied by the applicant (as reflected in the ES) should only be considered to the extent that the Secretary of State thinks they are both important and relevant to the decision	
Paragraph 4.2.26	Alternative proposals which mean the necessary development could not proceed, for example because the alternative proposals are not commercially viable or alternative proposals for sites would not be physically suitable, can be excluded on the grounds that they are not important and relevant to the Secretary of State's decision.	
Paragraph 4.2.27	Alternative proposals which are vague or inchoate can be excluded on the grounds that they are not important and relevant to the Secretary of State's decision.	

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Paragraph 4.2.28	<p>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.</p>	
Health		
Paragraph 4.3.4	<p>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.</p>	<p>Chapter 14: Human Health of the ES [EN010143/APP/6.1] includes an assessment of the Scheme’s impact on human health using IEMA guidance on health, which is a methodology for determining the significance of health effects developed by IEMA and specialists in the Human Health field. The assessment includes the effects of traffic, air or water pollution, dust, odour, hazardous waste and substances, noise, exposure to radiation, and increases in pests.</p>
Paragraph 4.3.5	<p>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</p>	<p>It also considers impacts on access to healthcare services and other social infrastructure, access to open space and nature, access to work and training, and social cohesion and neighbourhoods.</p>
Paragraph 4.3.6	<p>Opportunities should be taken to mitigate indirect impacts, by promoting local improvements to encourage health and wellbeing, this includes potential impacts on vulnerable groups within society, i.e. those groups which</p>	<p>Health and wellbeing perceptions and impacts to</p>

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	<p>may be differentially impacted by a development compared to wider society as a whole.</p>	<p>the mental health of local residents has also been taken into account throughout the assessment.</p> <p>As a result of the site selection and design, no significant adverse effects are predicted on health as a result of the Scheme.</p>
<p>Paragraph 4.3.7</p>	<p>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.</p>	<p>The impacts of the Scheme on health is addressed in Chapter 14: Human Health of the ES [EN010143/APP/6.1] which includes an assessment of the Scheme’s impact on human health using IEMA guidance on health, which is a methodology for determining the significance of health effects developed by IEMA and specialists in the Human Health field. The assessment</p>
<p>Paragraph 4.3.8</p>	<p>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.</p>	<p>includes the effects of traffic, air or water pollution, dust, odour, hazardous waste and substances, noise, exposure to radiation, and increases in pests.</p> <p>It also considers impacts on access to healthcare services and other social infrastructure, access to open space and nature, access to work and training, and social cohesion and neighbourhoods. Health and wellbeing perceptions and impacts to the mental health of local residents has also been taken into account throughout the assessment.</p> <p>As a result of the site selection and design, no significant adverse effects are predicted on health as a result of the Scheme.</p>

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Biodiversity Net Gain		
Paragraph 4.5.1	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 mitigate harms, following the mitigation hierarchy, but also consider whether there are opportunities for enhancements.	As set out in Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] the Scheme design has evolved to avoid statutorily designated sites where practicable. Measures embedded within the Scheme design ensure that statutory designated sites are not impacted during construction,
Paragraph 4.5.2	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.	operation or decommissioning (e.g., through siting construction routes away from designated sites where practicable, incorporating suitable buffer zones and erection of temporary construction fencing to avoid incursion into exclusion zones). The Scheme has been designed with the view to avoid key nature conservation and ecological features present within or adjacent to the Site as far as practicable. Accordingly, the following minimum buffers from key habitat features have been applied where practicable (e.g., some features such as hedgerows and waterbodies will be crossed): <ul style="list-style-type: none">i. 15m from woodlands (some cabling will lie within 15m of woodland);j. 10m from hedgerows increasing to 15m where there are hedgerow trees;k. 15m from individual trees;l. a minimum of 10m from watercourses (bank top) and ponds, to protect

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riparian habitats and to mitigate for potential hazards such as chemical and soils spills into watercourses/ waterbodies. This buffer is extended to at least 30m for the River Derwent, River Ouse and Watercourse DE53.

In addition, as noted above, **Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1]** and the **HRA [EN010143/APP/7.12]** explain that the Applicant has sought to prevent significant adverse effects on the integrity of Lower Derwent Valley SPA/Ramsar and the Humber Estuary SPA/Ramsar, by providing mitigation in the form of maintained agricultural land and creation of permanent wet/damp grassland will be provided as part of the Ecology Mitigation Areas 1g and 1h. Within this area a minimum of 30 ha of land (an amount that mirrors the functional field size supporting recorded peak counts of golden plover and pink-footed goose) will be specifically maintained on an annual basis to deliver adequate habitat to offset the loss of arable farmland used by golden plover and pink-footed goose. These would also be used by Skylark.

In addition, to minimise any potential for noise disturbance to otter using the River Derwent, River Ouse and Watercourse DE53, **Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1]**

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states that noise fencing will be utilised surrounding the HDD entry points.

The Scheme would include the provision of species rich grassland beneath the solar PV panels, which would be suitable for grazing whilst offering greater species diversity than the existing arable land.

The Scheme would provide extensive planting of woodland, hedgerow and an orchard which would all provide increases ecological connectivity and habitat.

Habitat boxes will also be installed on suitable features (buildings and trees) within the Site to provided additional nesting and roosting opportunities for bats and a range of bird species, including barn owl. A number of reptile and amphibian hibernacula/refugia will also be provided.

The **Framework LEMP [EN010143/APP/7.14]** contains details of all ecological mitigation and enhancements. A detailed LEMP will be prepared in accordance with this and will be secured by a requirement in the DCO.

The Applicant is committed to exceeding the Government's 10% target for biodiversity net gain as set out in the Environment Act 2021. A **Biodiversity Net Gain (BNG) report**

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		<p>[EN010143/APP/6.2], Natural England’s Biodiversity Metric 4.0, has been produced for the DCO Application. This report demonstrates that the Scheme has the potential to deliver significant biodiversity net gain on the Site, with 80% gain predicted for habitat biodiversity units. The Scheme has therefore taken advantage of opportunities to conserve and enhance biodiversity and accords with this policy.</p>
Paragraph 4.5.4	Energy NSIP proposals, whether onshore or offshore, should seek opportunities to contribute to and enhance the natural environment by providing net gains for biodiversity, or the wider environment where possible.	<p>The Applicant is committed to exceeding the Government’s 10% target for biodiversity net gain as set out in the Environment Act 2021. A Biodiversity Net Gain (BNG) report [EN010143/APP/6.2], Natural England’s Biodiversity Metric 4.0, has been produced for the DCO Application. This report demonstrates that the Scheme has the potential to deliver significant biodiversity net gain on the Site, with 80% gain predicted for habitat biodiversity units.</p>
Paragraph 4.5.5	In England applicants for onshore elements of any development are encouraged to use the most current version of the Defra biodiversity metric106 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.	<p>The Applicant is committed to exceeding the Government’s 10% target for biodiversity net gain as set out in the Environment Act 2021. A Biodiversity Net Gain (BNG) report [EN010143/APP/6.2], Natural England’s Biodiversity Metric 4.0, has been produced for the</p>
Paragraph 4.5.6	Where possible, this data should be shared with the Local Authority and Natural England for discussion at the pre-application stage as it can help to highlight	<p>DCO Application. This report demonstrates that the Scheme has the potential to deliver significant biodiversity net gain on the Site, with 80% gain predicted for habitat biodiversity units.</p>

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	biodiversity and wider environmental issues which may later cause delays if not addressed.	
Paragraph 4.5.8	Biodiversity net gain should be applied after compliance with the mitigation hierarchy and does not change or replace existing environmental obligations.	The Applicant is committed to exceeding the Government's 10% target for biodiversity net gain as set out in the Environment Act 2021. A Biodiversity Net Gain (BNG) report [EN010143/APP/6.2] , Natural England's Biodiversity Metric 4.0, has been produced for the DCO Application. This report demonstrates that the Scheme has the potential to deliver significant biodiversity net gain on the Site, with 80% gain predicted for habitat biodiversity units.
Paragraph 5.4.11	<p>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</p> <ul style="list-style-type: none"> • reductions in GHG emissions, • reduced flood risk, • improvements to air or water quality, • climate adaptation, • landscape enhancement, or • increased access to natural greenspace including trees and woodlands. <p>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</p>	<p>The Scheme will deliver a substantial reduction in greenhouse gas emissions over its lifetime, as explained by Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1].</p> <p>As the Scheme contributes to the delivery of low carbon energy, the need for fossil fuels will decrease, which may result in an indirect improvement to general air quality.</p> <p>The Scheme's climate adaptation measures are set out in the relevant ES Chapters, [EN010143/APP/6.1].</p> <p>Landscape enhancement measures are set out in the Framework LEMP [EN010143/APP/7.14].</p>

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environmental gains and benefits through the use of nature-based solutions and Green Infrastructure.

The Applicant is committed to exceeding the Government's 10% target for biodiversity net gain as set out in the Environment Act 2021. A **Biodiversity Net Gain (BNG) report [EN010143/APP/6.2]**, Natural England's Biodiversity Metric 4.0, has been produced for the DCO Application. This report demonstrates that the Scheme has the potential to deliver significant biodiversity net gain on the Site, with 80% gain predicted for habitat biodiversity units.

Paragraph 4.5.13

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.

The **Biodiversity Net Gain Assessment Report [EN010143/APP/7.11]** provides an assessment of how effective measures have been incorporated into the Scheme to deliver environmental gains. I

The Applicant is committed to exceeding the Government's 10% target for biodiversity net gain as set out in the Environment Act 2021. A **Biodiversity Net Gain (BNG) report [EN010143/APP/6.2]**, Natural England's Biodiversity Metric 4.0, has been produced for the DCO Application. This report demonstrates that the Scheme has the potential to deliver significant biodiversity net gain on the Site, with 80% gain predicted for habitat biodiversity units.

Opportunities to enhance other environmental gains are outlined by topic in the relevant sections of the **ES Volume 1 [EN010143/APP/6.1]**, the

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		Framework LEMP [EN010143/APP/7.14] and how these have been incorporated as part of good design is set out in the DAS [EN010143/APP/7.3] and Section 6 of this Planning Statement.
Paragraph 4.5.14	Applicants should make use of available guidance and tools for measuring natural capital assets and ecosystem services, such as the Natural Capital Committee’s ‘How to Do it: natural capital workbook’, Defra’s guidance on Enabling a Natural Capital Approach (ENCA), and other tools that aim to enable wider benefits for people and nature.	The management strategy for the Site is outlined in the Framework LEMP [EN010143/APP/7.14] and Framework Soil Management Plan [EN010143/APP/7.10] .
Paragraph 4.5.15	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.	Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1] explains how the alternative options for the Scheme were considered during design development.
Paragraph 4.5.17	Although achieving biodiversity net gain is not currently an obligation on applicants, Schedule 15 of the Environment Act 2021 contains provisions which, when commenced, mean the Secretary of State may not grant an application for Development Consent Order unless satisfied that a biodiversity gain objective is met in relation to the onshore112 development in England to which the application relates.	The Applicant is committed to exceeding the Government’s 10% target for biodiversity net gain as set out in the Environment Act 2021. A Biodiversity Net Gain (BNG) report [EN010143/APP/6.2] , Natural England’s Biodiversity Metric 4.0, has been produced for the DCO Application. This report demonstrates that the Scheme has the potential to deliver significant biodiversity net gain on the Site, with 80% gain predicted for habitat biodiversity units.
Design		
Paragraph 4.6.2	Applying “good design” to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of	As detailed in Section 6.3 of this Planning Statement the Scheme has been subject to a detailed and sensitive iterative design process

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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

which has considered environmental constraints and opportunities in order to develop a good design that balances the need to maximise renewable energy generation from the Scheme, whilst minimising potential impacts and providing mitigation and enhancement measures where practicable. The design process and evolution of the proposed design are summarised in **Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010142/APP/6.1]**, and the **Design and Access Statement [EN010142/APP/7.3]**.

Paragraph 4.6.4

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.

As detailed in the **Design and Access Statement [EN010143/APP/7.3]** and Section 6.3 of the **Planning Statement [EN010143/APP/7.2]**, the Scheme has been informed by a detailed and sensitive iterative design process. This has involved taking account of the context and features of the land within the Order limits, sensitive receptors, information from environmental surveys and feedback from stakeholders. The design also takes into account constraints and opportunities in order to develop a good design that balances the need to maximise renewable energy generation from the Scheme along with the minimisation of potential impacts or provision of mitigation and environmental enhancements where practicable. The design process and basis of design decisions are set out in **Chapter 3: Alternatives and Design**

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Paragraph 4.6.5

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.

Evolution [EN010143/APP/6.1], Volume 1 of the ES [EN010142/APP/6.1] and the Design and Access Statement [EN010142/APP/7.3]

As detailed in the **Design and Access Statement [EN010143/APP/7.3]** and Section 6.3 of the **Planning Statement [EN010143/APP/7.2]**, the Scheme has been informed by a detailed and sensitive iterative design process. This has involved taking account of the context and features of the land within the Order limits, sensitive receptors, information from environmental surveys and feedback from stakeholders. The design also takes into account constraints and opportunities in order to develop a good design that balances the need to maximise renewable energy generation from the Scheme along with the minimisation of potential impacts or provision of mitigation and environmental enhancements where practicable. The design process and basis of design decisions are set out in **Chapter 3: Alternatives and Design Evolution [EN010143/APP/6.1], Volume 1 of the ES [EN010142/APP/6.1] and the Design and Access Statement [EN010142/APP/7.3]**.

As set out in the **Design and Access Statement [EN010142/APP/7.3]**, key members of the design team, the lead landscape architect and lead ecologist, have led the multidisciplinary approach from the initial stages to the present therefore

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		<p>delivering the design champion role encouraged by Draft NPS EN-1. This has been achieved through leading design workshops and balancing the input from all members of the design team as well as the views of external stakeholders.</p>
<p>Paragraph 4.6.6</p>	<p>Whilst the applicant may not have any or very limited choice in the physical appearance of some energy infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting relative to existing landscape character, land form and vegetation. Furthermore, the design and sensitive use of materials in any associated development such as electricity substations will assist in ensuring that such development contributes to the quality of the area. Applicants should also, so far as is possible, seek to embed opportunities for nature inclusive design within the design process.</p>	<p>As detailed in the Design and Access Statement [EN010143/APP/7.3] and Section 6.3 of the Planning Statement [EN010143/APP/7.2], the Scheme has been informed by a detailed and sensitive iterative design process. This has involved taking account of the context and features of the land within the Order limits, sensitive receptors, information from environmental surveys and feedback from stakeholders. The design also takes into account constraints and opportunities in order to develop a good design that balances the need to maximise renewable energy generation from the Scheme along with the minimisation of potential impacts or provision of mitigation and environmental enhancements where practicable.</p> <p>The design process and basis of design decisions are set out in Chapter 3: Alternatives and Design Evolution [EN010143/APP/6.1], Volume 1 of the ES [EN010142/APP/6.1] and the Design and Access Statement [EN010142/APP/7.3]</p>
<p>Paragraph 4.6.7</p>	<p>Applicants must demonstrate in their application documents how the design process was conducted and</p>	<p>The design process and basis of design decisions are set out in Chapter 3: Alternatives and</p>

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	<p>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.</p>	<p>Design Evolution [EN010143/APP/6.1], Volume 1 of the ES [EN010142/APP/6.1] and the Design and Access Statement [EN010142/APP/7.3]</p>
<p>Paragraph 4.6.8</p>	<p>Applicants should consider taking independent professional advice on the design aspects of a proposal. In particular, the Design Council can be asked to provide design review for nationally significant infrastructure projects and applicants are encouraged to use this service. Applicants should also consider any design guidance developed by the local planning authority.</p>	<p>The design team has worked collaboratively to provide an integrated and responsive design. The Applicant has sought feedback from a wide range of stakeholders to inform each stage of the design process, and have had regard to these comments, in accordance with requirements of the PA 2008 and Ministry of Housing, Communities and Local Government (MHCLG) guidance. The Applicant has also built relationships with key stakeholders to better understand their views and incorporate design changes where possible. These stakeholders have included planning, highway, heritage, landscape, ecology and PRow officers at East Riding of Yorkshire Council and North Yorkshire Council; the Environment Agency; Historic England; Natural England and the relevant Internal Drainage Boards.</p>
<p>Paragraph 4.6.11</p>	<p>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.</p>	<p>While the appearance of solar panels is largely set by their function, the site layout, landscaping and access design have all been designed to reflect good design principles.</p> <p>Good design has been a key consideration from the outset. The LVIA has informed the iterative</p>

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Paragraph 4.6.12

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.

design process, which is set out in the **Design and Access Statement [EN010143/APP/7.3]**. The Scheme layout and design has been developed in response to policy requirements, published landscape character assessment guidance and fieldwork analysis. The design mitigation has been embedded in the Scheme to minimise effects on landscape character and visual amenity as shown in the **Framework LEMP [EN010143/APP/7.14]**. A LEMP will be prepared in accordance with this, and will be secured by the DCO. The landscape design principles aim to achieve the following:

1. Careful siting in the landscape
2. Conserving the existing vegetation patterns
3. Creating new green infrastructure
4. Sensitive Design in Relation to Form, Colour, and Materials
5. Sensitive Design of Lighting

Climate Change Adaption

Paragraph 4.9.5

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 (see Section 5.6). In

Consideration has been given to incorporating nature-based climate change adaption into the Scheme, and proposals for SuDS have been included.

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	<p>preparing measures to support climate change adaptation applicants should take reasonable steps to maximise the use of nature-based solutions alongside other conventional techniques.</p>	<p>Details of the approaches taken to adapt to climate change are set out in Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1], Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 [EN010143/APP/6.1] and their related appendices.</p>
Paragraph 4.9.6	<p>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.</p>	
Paragraph 4.9.7	<p>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 (see also Section 5.11 on the role of green infrastructure and Section 4.5 on environmental and biodiversity net gain).</p>	
Paragraph 4.9.8	<p>New energy infrastructure will typically be a long-term investment and will need to remain operational over many decades, in the face of a changing climate. Consequently, applicants must consider the direct (e.g. site flooding, limited water availability, storms, heatwave and wildfire threats to infrastructure and operations) and indirect (e.g. access roads or other critical dependencies impacted by flooding, storms, heatwaves or wildfires) impacts of climate change when planning the location, design, build, operation and, where appropriate, decommissioning of new energy infrastructure</p>	<p>Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1], Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 [EN010143/APP/6.1], and Chapter 16: Other Environmental Topics, ES Volume 1 [EN010143/APP/6.1] consider the direct, and indirect effects of the Scheme on flooding, storms, major accidents and disasters and the impacts of climate change. These have been considered in the design, build, operation and decommissioning of the Scheme.</p>

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Paragraph 4.9.9	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, 142 Climate Impacts Tool, 143 and British Standards for climate change adaptation, 144 in accordance with the EIA Regulations. This information will be needed by the Secretary of State.	As outlined in Chapter 6: Climate Change of the ES [EN010143/APP/6.1] , the effects of climate change have been taken into account in the design of the Scheme, and when considering how it will be constructed, operated and decommissioned. The measures embedded into the Scheme design are set out in section 6.7, and include (but are not limited to):
Paragraph 4.9.11	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.	<ul style="list-style-type: none"> a. Adopting the Considerate Constructors Scheme (CCS) b. Encouraging to all construction staff to the use of lower carbon modes of transport by identifying and communicating local bus and rail connections and pedestrian and cycle access routes to/from the Scheme and providing appropriate facilities for the safe storage of cycles; c. Implementing a Framework CTMP (Appendix 13-5, ES Volume 2 [EN010143/APP/6.2]) to reduce the volume of construction staff and employee trips to the Site; d. Switching vehicles and plant off when not in use and ensuring construction vehicles conform to European Union (EU) vehicle emissions standards for the types of plant and vehicles to be used;

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- e. Where practicable, maximise the use of alternative materials with lower embodied carbon such as locally sourced products and materials with a higher recycled content;
- f. Named person(s) – likely the Safety, Health and Environment Manager/ Ecological Clerk of Works (ECoW) – to monitor weather forecasts and receive of Environment Agency flood alerts to allow works to be planned and carried out accordingly to manage extreme weather conditions, such as storms and flooding; and
- g. Health and safety plans developed for construction activities will be required to account for potential climate change impacts on workers, such as flooding and heatwaves. To include measures such as toolbox talks on training on dangers of extreme weather conditions.
- h. Use of motion detection security lighting to avoid permanent lighting and reduce energy demand of the Scheme;
- i. Establish, monitor, and manage landscape and ecology mitigation and enhancement (BNG) measures embedded in the design, secured through the **Framework LEMP [EN010143/APP/7.14]**, which has been submitted as part of the DCO application;

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- j. Regular maintenance of the Scheme will be conducted to optimise the efficiency of the Scheme infrastructure;
- k. Operating the Scheme in such a way as to minimise the creation of waste and maximise the use of alternative materials with lower embodied carbon, such as locally sourced products and materials with higher recycled content; and

A Framework **CEMP [EN010143/APP/7.7]**, **Framework OEMP [EN010143/APP/7.8]** and **Framework DEMP [EN010143/APP/7.9]** will be developed into a detailed CEMP, OEMP and DEMP prior to the construction phase commences as a means to secure the embedded mitigation measures mentioned above.

Further climate change resilience measures embedded within the Scheme, particularly in relation to flood risk are included in the **Framework CEMP [EN010143/APP/7.7]**. The specific flood risk impacts and associated mitigation measures are discussed in more detail in **Chapter 9: Flood Risk, Drainage and Surface Water, ES Volume 1 [EN010143/APP/6.2]**.

In addition, adaptation measures to reduce the effect of projected temperature increases on electrical equipment over the course of the Scheme's design life have been taken into

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		<p>account. PV inverters will have a cooling system installed to control the temperature and allow the inverters to operate efficiently in warmer conditions. The PV modules and transformers have a wide range of acceptable operation temperatures, and it has been determined that increasing temperatures will not adversely affect their operation.</p>
Paragraph 4.12.5	Applicants should consult with the HSE on matters relating to safety	The Applicant team has consulted with the HSE.
Paragraph 4.12.6	Applicants seeking to develop infrastructure subject to the COMAH regulations should make early contact with the Competent Authority.	The Scheme is not subject to the COMAH regulations.
Paragraph 4.12.7	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	The Scheme is not subject to the COMAH regulations and a safety report is not required.
Paragraph 4.12.8	The Secretary of State should be satisfied that a safety assessment has been done, where required, and that the Competent Authority has assessed that it meets the safety objectives described above.	The Scheme is not subject to the COMAH regulations, and a safety report is not required.
Air Quality and emissions		
Paragraph 5.2.6	Proximity to emission sources can have significant impacts on sensitive receptor sites for air quality, such as	Section 16.2 of Chapter 16, Other Environmental Topics of the ES

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	<p>education or healthcare sites, residential use or sensitive or protected ecosystems. Projects near a sensitive receptor site for air quality should only be proposed in exceptional circumstances if no viable alternative site is available. In these instances, substantial mitigation of any expected emissions will be required</p>	<p>[EN010143/APP/6.1] assesses the impacts of the construction and decommissioning of the Scheme on local air quality. This concludes that there would be no significant impact on sensitive receptor sites for air quality. The assessment is in accordance with paragraph 5.2.8.</p>
Paragraph 5.2.7	<p>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.</p>	
Paragraph 5.2.8	<p>The ES should describe:</p> <ul style="list-style-type: none"> • existing air quality levels and the relative change in air quality from existing levels; • any significant air emissions, their mitigation 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 emission levels of the proposed project, after mitigation methods have been applied; and any potential eutrophication impacts. 	
Paragraph 5.2.10	<p>Where a proposed development is likely to lead to a breach of the air quality thresholds 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 at the time of the decision, the applicant should work with the relevant authorities to secure appropriate</p>	<p>The Scheme would not lead to a breach of air quality thresholds or affect the ability of a non-compliant area to achieve compliance.</p>

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	mitigation measures to ensure that those thresholds are not breached.	
Paragraph 5.2.11	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 or any successor to it and should consider relevant advice within Local Air Quality Management guidance.	<p>Section 16.2 of Chapter 16, Other Environmental Topics of the ES [EN010143/APP/6.1] concludes that there are no anticipated significant effects on air quality as a result of the Scheme.</p> <p>A Framework CEMP [EN010143/APP/7.7] and Framework DEMP [EN/010143/APP/7.9] include measures from the IAQM dust guidance and their implementation will be secured via Requirement. A details Framework DEMP [EN/010143/APP/7.9] will be prepared prior to the decommissioning also secured by a DCO Requirement.</p>
Paragraph 5.2.13	Many activities involving air emissions are subject to pollution control. The considerations set out in Section 4.11 on the interface between planning and pollution control therefore apply. The SoS 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.	
Paragraph 5.2.14	The Secretary of State should generally give air quality considerations substantial weight where a project would lead to a deterioration in air quality in an area or leads to a new area where air quality 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 national air quality limits or statutory air quality objectives.	<p>Section 16.2 of Chapter 16, Other Environmental Topics of the ES [EN010143/APP/6.1] concludes that there are no anticipated significant effects on air quality as a result of the Scheme.</p> <p>A Framework CEMP [EN010143/APP/7.7] and Framework DEMP [EN/010143/APP/7.9] include measures from the IAQM dust guidance and their implementation will be secured via Requirement. A</p>

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Paragraph 5.2.15	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.	<p>details Framework DEMP [EN/010143/APP/7.9] will be prepared prior to the decommissioning also secured by the DCO.</p> <hr/> <p>Section 16.2 of Chapter 16, Other Environmental Topics of the ES [EN010143/APP/6.1] concludes that there is likely to be no significant impact on local air quality during construction and decommissioning given the volume of traffic proposed and the predicted pollutant concentrations would have a negligible effect on human health and designated ecology sites.</p>
Paragraph 5.2.16	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.	<p>The Site is located in a rural area but close to a number of villages, and consequently there are a large number of receptors in proximity to the Site that may be affected by the works. This includes high sensitivity receptors such as residential properties, as well as medium sensitivity receptors such as commercial, office and warehouse units.</p> <p>However, the implementation of the mitigation measures is expected to prevent the occurrence of significant impacts arising from dust generation during the construction phase. Minimising emissions of dust and/or suppressing dust at the source will reduce the potential for transport of dust off-site, therefore reducing the potential exposure of sensitive receptors to dust related</p>

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		impacts. Residual effects are therefore assessed as being not significant.
Paragraph 5.2.17	In all cases, the Secretary of State must take account of any relevant statutory air quality limits and statutory air quality objectives. If a project will lead to non-compliance with a statutory limit the Secretary of State should refuse consent	The Scheme would not result in non-compliance with any statutory air quality limit or objective.
Paragraph 5.7.5	The applicant should assess the potential for.... emissions of odour, dust..., to have a detrimental impact on amenity, as part of the ES.	<p>Section 16.2 of Chapter 16, Other Environmental Topics of the ES [EN010143/APP/6.1] assesses the effects of the Scheme on emissions or odour and dust.</p> <p>A dust risk assessment has been undertaken as required by NPS EN-1 paragraph 5.6.4 and can be found in Chapter 16, Other Environmental Topics, ES Volume 1 [EN010143/APP/6.1].</p> <p>The Scheme will not emit any odour. Construction and decommissioning activities will be undertaken with best practice measures, as set out in the Framework CEMP [EN010143/APP/7.7].</p>
Paragraph 5.7.11	A construction management plan may help clarify and secure mitigation	<p>A Framework CEMP [EN010143/APP/7.7] is included within the DCO application.</p> <p>The Framework CEMP [EN010143/APP/7.7] will be developed into a detailed CEMP prior to the construction phase commences as a means to secure embedded mitigation measures and best practice.</p>

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Paragraph 5.7.12

The Secretary of State should satisfy itself that:

- an assessment of the potential fordust, odour..., 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

A dust risk assessment has been undertaken as required by NPS EN-1 paragraph 5.6.4 and can be found in **Chapter 16, Other Environmental Topics, ES Volume 1 [EN010143/APP/6.1]**.

The Scheme will not emit any odour. Construction and decommissioning activities will be undertaken with best practice measures, as set out in the **Framework CEMP [EN010143/APP/7.7]**.

Greenhouse Gas Emissions

Paragraph 5.3.4

All proposals for energy infrastructure projects should include a GHG assessment as part of their ES (See Section 4.2). This should include:

- A whole life GHG assessment showing construction, operational and decommissioning GHG impacts.
- An explanation of the steps that have been taken to drive down the climate change impacts at each of those stages.
- Measurement of embodied GHG impact from the construction stage.
- How reduction in energy demand and consumption during operation has been prioritised in comparison with other measures.
- How operational emissions have been reduced as much as possible through the application of best available technology for that type of technology.

Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1] presents a lifecycle greenhouse gas (GHG) impact assessment over the lifetime of the Scheme. It concludes that renewable energy generation from the Scheme during the first full year of operation (2027) is estimated to be 433,709 MWh based on a 480MW capacity of the Scheme. The operational emissions over the design life of the Scheme are estimated at 65,337 tCO₂e. The GHG impact of construction and decommissioning are anticipated to result in minor adverse and non-significant effects on the climate. This demonstrates the Scheme's very low carbon attributes compared to other non-renewable forms of electricity generation, providing an overall major beneficial impact in relation to the UK meeting its carbon reduction targets.

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	<ul style="list-style-type: none"> • Calculation of operational energy consumption and associated carbon emissions. • Whether and how any residual GHG emissions will be (voluntarily) offset or removed using a recognised framework. • Where there are residual emissions, the level of emissions and the impact of those on national and international efforts to limit climate change, both alone and where relevant in combination with other developments at a regional or national level, or sector level, if sectoral targets are developed 	<p>GHG mitigation measures are outlined in the Embedded Mitigation (Section 6.6) of Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1].</p> <p>A Framework CEMP [EN010143/APP/7.7] is included within the DCO application. This identifies various mitigation measures to be embedded within the Scheme to reduce the GHG impact.</p> <p>A Framework OEMP [EN010143/APP/7.8] has been submitted as part of the DCO application. This identifies various mitigation measures to be embedded within the Scheme to reduce the GHG and environmental impact of operations.</p>
Paragraph 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.	
Paragraph 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.	
Paragraph 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	

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	creation, peatland restoration and through other natural habitats.	
Paragraph 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.	Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1] presents a lifecycle greenhouse gas (GHG) impact assessment over the lifetime of the Scheme. It concludes that Renewable energy generation from the Scheme during the first full year of operation (2027) is estimated to be 433,709 MWh based on a 480MW capacity of the Scheme. The operational emissions over the design life of the Scheme are estimated at 65,337 tCO ₂ e. The GHG impact of construction and decommissioning are anticipated to result in minor adverse and non-significant effects on the climate. This demonstrates the Scheme’s very low carbon attributes compared to other non-renewable forms of electricity generation, providing an overall major beneficial impact in relation to the UK meeting its carbon reduction targets.
Paragraph 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.	
Paragraph 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.	
Biodiversity and Geological Conservation		
Paragraph 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.	A HRA [EN010143/APP/7.12] , has been undertaken and submitted with this Application. Natural England have been consulted with regard to the Appropriate Assessment in accordance with this policy.

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Paragraph 5.4.5	<p>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:</p> <ul style="list-style-type: none">(a) potential Special Protection Areas and possible Special Areas of Conservation;(b) listed or proposed Ramsar sitl and(c) sites identified, or required, as compensatory measures for adverse effects on any of the other sites covered by this paragraph.	<p>The Applicant's appropriate assessment, set out in the HRA concludes that the Scheme has the potential to result in the loss of arable land that is functionally linked to the Lower Derwent Valley SPA/Ramsar and Humber Estuary SPA/Ramsar. Therefore, mitigation will be delivered to offset the permanent loss of supporting habitat for golden plover and pink-footed goose under the operational footprint of the Scheme. A total of 30ha of mitigation habitat will be provided. 15ha of wet grassland will be delivered in the Golden Plover Mitigation Zone adjoining the River Foulness, and 15ha of arable land maintained under a suitable cropping regime and management practices (e.g., longer retention of winter stubbles) will be provided in the Goose Mitigation Zone on a rotational basis.</p> <p>Overall, the HRA concludes that the Scheme would not result in adverse effects on the integrity of the Lower Derwent Valley SPA/Ramsar and Humber Estuary SPA/Ramsar.</p>
Paragraph 5.4.8	<p>Development on land within or outside a SSSI, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits (including need) of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special</p>	<p>Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] sets out that the Grid Connection Corridor crosses the River Derwent SAC, an Internationally Designated Nature Site and the River Derwent SSSI, a Nationally Designated Nature Site. The River Derwent SAC/SSSI will be crossed using HDD, therefore</p>

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	scientific interest, and any broader impacts on the national network of SSSIs.	there would be no direct impacts to the River Derwent and associated riparian habitats. Measures will be implemented to minimise visual, lighting and noise disturbance. These are outlined in the Framework CEMP [EN010143/APP/7.7] and secured within a detailed CEMP as a DCO requirement.
Paragraph 5.4.12	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.	As set out in Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] there are two non-statutory sites of nature conservation within the Order limits. These comprise Tottering Lane, Gribthorpe Local Wildlife Site (LWS) and Wressle Verge LWS. To limit disturbance to habitat inside these LWS during construction, the working area for the cable installation across the verges will be kept to a minimum of 5m width inside the LWSs and no spoil, materials or vehicles will be stored within the LWS. Once the cable(s) have been installed, the removed turfs and soil from the LWS (stored separately to that of adjacent fields) will be backfilled and replaced promptly, retaining the original topsoil and seed bank. Hedgerows would be retained and appropriate measures (e.g., fencing and signage) will ensure no encroachment into the LWSs, outside of the required working areas.
Paragraph 5.4.13	National planning policy expects plans to identify and map Local Wildlife sites, and to include policies that not only secure their protection from harm or loss but also help to enhance them and their connection to wider ecological networks.	

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Vegetation clearance will be required for provision of the new and modified existing access tracks across the LWSs. The replacement of the hedgerows and retention of the verge turfs relating to this work has been included within the landscape design (as presented in the **Framework LEMP [EN010143/APP/7.14]**).

Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] states that where temporary habitat loss is unavoidable, reinstatement will be undertaken after construction where practicable. Large areas of grassland creation are included within the landscape design throughout the Solar PV Areas, both around the solar PV panels and in the field margins of each field. These can be managed towards LWS criteria.

Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] concludes that there would be no significant adverse effects on local or regional biodiversity sites as a result of construction, operation or decommissioning of the Scheme.

Paragraph 5.4.15

Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Ancient or veteran trees found outside ancient woodland are also particularly valuable. Other types of irreplaceable habitats include blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen.

Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] concludes that there would be no loss of ancient woodland, or veteran or ancient trees as a result of the Scheme.

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As detailed in **Appendix 10-5: Arboricultural Impact Assessment and Tree Protection Report, ES Volume 2 [EN010143/APP/6.2]**, two veteran trees and one ancient tree are subject to an incursion into their Root Protection Area (RPA) or canopy spread. In all cases, RPA incursions will be managed so that there will be no detrimental impacts on the health or amenity of retained trees.

Chapter 8: Ecology, ES Volume 1 [EN101043/APP/6.1] also states that one ancient tree (T45) may require pruning to facilitate a temporary clearance for vehicular access. The final extent of pruning is to be agreed on site with an arboriculturist, but is not considered likely to result in a detrimental impact to the tree due to its species (crack willow) which is tolerant of pruning), good vitality and due to the existing clearance maintained over the existing hard surfaced access route.

Paragraph 5.4.17

Where the development is subject to EIA the applicant should ensure that the ES clearly sets out any effects on internationally, nationally, and locally designated sites of ecological or geological conservation importance (including those outside England), on protected species and on habitats and other species identified as being of principal importance for the conservation of biodiversity, including irreplaceable habitats.

Section 8.4 of **Chapter 8: Ecology, ES Volume 2 [EN010143/APP/6.1]** sets out all the designated sites of ecological or geological conservation importance; protected species; and habitats and other species identified as being of principal importance for the conservation of biodiversity within an identified study area for the Scheme.

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Paragraph 5.4.18	The applicant should provide environmental information proportionate to the infrastructure where EIA is not required to help the Secretary of State consider thoroughly the potential effects of a proposed project.	<p>Section 8.7 of Chapter 8: Ecology, ES Volume 2 [EN010143/APP/6.1] goes on to set out the expected effects on the above receptors during the construction, operation and decommissioning phases of the Scheme. This concludes that with the application of mitigation measures set out in sections 8.6 and 8.8 of Chapter 8: Ecology, ES Volume 2 [EN010143/APP/6.1] no residual significant adverse effects have been identified on any internationally, nationally or locally designated sites during construction, operation or decommissioning of the Scheme.</p> <p>The scope of the ES [EN010143/APP/6.1] accords with this policy</p>
Paragraph 5.4.19	The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests.	As set out in Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] the Scheme design has evolved to avoid statutorily designated sites where practicable. Measures embedded within the Scheme design ensure that statutory designated sites are not impacted during construction,
Paragraph 5.4.20	Applicants should consider wider ecosystem services and benefits of natural capital when designing enhancement measures.	operation or decommissioning (e.g., through siting construction routes away from designated sites where practicable, incorporating suitable buffer zones and erection of temporary construction fencing to avoid incursion into exclusion zones).
Paragraph 5.4.21	As set out in Section 4.6, 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 4.5 on Environmental and Biodiversity Net Gain). The scope of potential gains	The Scheme has been designed with the view to avoid key nature conservation and ecological features present within or adjacent to the Site as

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will be dependent on the type, scale, and location of each project.

far as practicable. Accordingly, minimum buffers from key habitat features have been applied where practicable, as set out in **Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1]**.

In addition, as noted above, **Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1]** and the **HRA [EN010143/APP/7.12]** explain that the Applicant has sought to prevent significant adverse effects on the integrity of Lower Derwent Valley SPA/Ramsar and the Humber Estuary SPA/Ramsar, by providing mitigation in the form of maintained agricultural land and creation of permanent wet/damp grassland will be provided as part of the Ecology Mitigation Areas 1g and 1h. Within this area a minimum of 30 ha of land (an amount that mirrors the functional field size supporting recorded peak counts of golden plover and pink-footed goose) will be specifically maintained on an annual basis to deliver adequate habitat to offset the loss of arable farmland used by golden plover and pink-footed goose. These would also be used by Skylark.

In addition, to minimise any potential for noise disturbance to otter using the River Derwent, River Ouse and Watercourse DE53, **Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1]** states that noise fencing will be utilised surrounding the HDD entry points.

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The Scheme would include the provision of species rich grassland beneath the solar PV panels, which would be suitable for grazing whilst offering greater species diversity than the existing arable land.

The Scheme would provide extensive planting of woodland, hedgerow and an orchard which would all provide increases ecological connectivity and habitat.

Habitat boxes will also be installed on suitable features (buildings and trees) within the Site to provided additional nesting and roosting opportunities for bats and a range of bird species, including barn owl. A number of reptile and amphibian hibernacula/refugia will also be provided.

The **Framework LEMP [EN010143/APP/7.14]** contains details of all ecological mitigation and enhancements. A detailed LEMP will be prepared in accordance with this and will be secured by a requirement in the DCO.

The Applicant is committed to exceeding the Government's 10% target for biodiversity net gain as set out in the Environment Act 2021. A **Biodiversity Net Gain (BNG) report [EN010143/APP/6.2]**, Natural England's Biodiversity Metric 4.0, has been produced for the

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Paragraph 5.4.22

The design of Energy NSIP proposals will need to consider the movement of mobile / migratory species such as birds, fish and marine and terrestrial mammals and their potential to interact with infrastructure. As energy infrastructure could occur anywhere within England and Wales, both inland and onshore and offshore, the potential to affect mobile and migratory species across the UK and more widely across Europe (transboundary effects) requires consideration, depending on the location of development.

DCO Application. This report demonstrates that the Scheme has the potential to deliver significant biodiversity net gain on the Site, with 80% gain predicted for habitat biodiversity units.

The Scheme has taken into consideration the movement of mobile / migratory species, such as birds, fish and marine and terrestrial mammals, and their potential to interact with infrastructure, in **Chapter 8: Ecology, ES Volume 2 [EN010143/APP/6.1]**.

Section 8.8 and 8.9 of Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] and the **HRA [EN010143/APP/7.12]** concludes that the Scheme has the potential to result in the loss of arable land that is functionally linked to the Lower Derwent Valley SPA/Ramsar and Humber Estuary SPA/Ramsar. Therefore, mitigation will be delivered to offset the permanent loss of supporting habitat for golden plover and pink-footed goose under the operational footprint of the Scheme. A total of 30ha of mitigation habitat will be provided. 15ha of wet grassland will be delivered in the Golden Plover Mitigation Zone adjoining the River Foulness, and 15ha of arable land maintained under a suitable cropping regime and management practices (e.g., longer retention of winter stubbles) will be provided in the Goose Mitigation Zone on a rotational basis.

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Paragraph 5.4.25

The applicant should seek the advice of the appropriate Statutory Nature Conservation Bodies (SNCB) and provide the Secretary of State with such information as the Secretary of State may reasonably require, to determine whether an Appropriate Assessment (AA) is required. Applicants can request and agree 'Evidence Plans' with SNCBs, which is a way to agree and 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

Overall, it is concluded that the Scheme would not result in any adverse effects on these species, and no residual significant adverse effects have been identified on any other species or habitats during construction, operation or decommissioning of the Scheme.

The HRA Stage 1 assessment – Screening for Likely Significant Effects, and Stage 2 – Appropriate Assessment have been undertaken to inform the ES and is included with the DCO submission within the **HRA [EN010143/APP/7.12]**. As part of Stage 2, this includes information on any measures proposed to avoid or mitigate adverse effects on the integrity of the designated sites included in the assessment. Engagement has been undertaken with relevant stakeholders such as Natural England with regards to the HRA.

Paragraph 5.4.26

If, during the pre-application stage, the SNCB indicate that the proposed development is likely to adversely impact the integrity of HRA sites, the applicant must include with their application such information as may reasonably be required to assess a potential derogation under the Habitats Regulations.

The **HRA [EN010143/APP/7.12]** has been undertaken to inform the ES and is included with the DCO submission. This includes information on any measures that are required to avoid or mitigate negative impacts on the designated sites included in the assessment in relation to the identified impact pathways. The HRA concludes that the Scheme will not result in adverse effects

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Paragraph 5.4.27	If the SNCB gives such an indication at a later stage in the development consent process, the applicant must provide this information as soon as is reasonably possible and before the close of the examination. This information must include assessment of alternative solutions, a case for Imperative Reasons of Overriding Public Interest (IROPI) and appropriate environmental compensation.	on the integrity of any European sites. Therefore, information regarding a derogation under the Habitats Regulations is not required. In the event that a relevant SNCB later concludes that adverse effects on the integrity of European site(s) cannot be avoided or mitigated, then appropriate information will be provided to confirm that the Scheme meets the three derogation tests (No Reasonable Alternatives, Imperative Reasons of Overriding Public Interest and adequate compensation).
Paragraph 5.4.28	Provision of such information will not be taken as an acceptance of adverse impacts and if an applicant disputes the likelihood of adverse impacts, it can provide this information as part of its application ‘without prejudice’ to the Secretary of State’s final decision on the impacts of the potential development. If, in these circumstances, an applicant does not supply information required for the assessment of a potential derogation, there will be no expectation that the Secretary of State will allow the applicant the opportunity to provide such information following the examination.	
Paragraph 5.4.29	It is vital that applicants consider the need for compensation as early as possible in the design process as ‘retrofitting’ compensatory measures will introduce delays and uncertainty to the consenting process.	The HRA [EN010143/APP/7.12] has assessed all impact pathways and European sites for which Likely Significant Effects could not be excluded in a more detailed Appropriate Assessment (AA). The AAs for all relevant impact pathways conclude that the Scheme will not result in adverse effects on the integrity of any European sites. Therefore,

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Paragraph 5.4.30	Applicants should work closely at an early stage in the pre-application process with SNCB and Defra/Welsh Government to develop a compensation plan for all protected sites adversely affected by the development.	<p>there are no environmental compensation requirements to be considered.</p> <p>Natural England have been consulted on the proposed embedded mitigation measures and any additional mitigation measures for protected sites that have the potential to have been adversely impacted by the Scheme.</p>
Paragraph 5.4.32	Applicants should include measures to mitigate the direct and indirect effects of development on ancient woodland, veteran trees or other irreplaceable habitats during both construction and operational phase.	<p>Chapter 8: Ecology, ES Volume 1 [EN101043/APP/6.1] concludes that there would be no loss of ancient woodland, or veteran or ancient trees as a result of the Scheme.</p> <p>As detailed in Appendix 10-5: Arboricultural Impact Assessment and Tree Protection Report, ES Volume 2 [EN010143/APP/6.2], two veteran trees and one ancient tree are subject to an incursion into their Root Protection Area (RPA) or canopy spread. In all cases, RPA incursions will be managed so that there will be no detrimental impacts on the health or amenity of retained trees.</p> <p>Chapter 8: Ecology, ES Volume 1 [EN101043/APP/6.1] also states that one ancient tree (T45) may require pruning to facilitate a temporary clearance for vehicular access. The final extent of pruning is to be agreed on site with an arboriculturist but is not considered likely to result in a detrimental impact to the tree due to its species (crack willow) which is tolerant of</p>

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Paragraph 5.4.33	Applicants should consider any reasonable opportunities to maximise the restoration, creation, and enhancement of wider biodiversity, and the protection and restoration of the ability of habitats to store or sequester carbon as set out under Section 4.5.	pruning), good vitality and due to the existing clearance maintained over the existing hard surfaced access route.
Paragraph 5.4.34	Consideration should be given to improvements to, and impacts on, habitats and species in, around and beyond developments, for wider ecosystem services and natural capital benefits, beyond those under protection and identified as being of principal importance. This may include considerations and opportunities identified through Local Nature Recovery Strategies, and national goals and targets set through the government’s strategy for nature for example.	<p>As set out in Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] the Scheme design has evolved to avoid statutorily designated sites where practicable. Measures embedded within the Scheme design ensure that statutory designated sites are not impacted during construction, operation or decommissioning (e.g., through siting construction routes away from designated sites where practicable, incorporating suitable buffer zones and erection of temporary construction fencing to avoid incursion into exclusion zones). The Scheme has been designed with the view to avoid key nature conservation and ecological features present within or adjacent to the Site as far as practicable, with minimum buffers from key habitat features.</p> <p>In addition, as noted above, Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] and the HRA [EN010143/APP/7.12] explain that the Applicant has sought to prevent significant adverse effects on the integrity of Lower Derwent Valley SPA/Ramsar and the Humber Estuary SPA/Ramsar, by providing mitigation in the form of maintained agricultural land and creation of permanent wet/damp grassland will be provided</p>

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as part of the Ecology Mitigation Areas 1g and 1h. Within this area a minimum of 30 ha of land (an amount that mirrors the functional field size supporting recorded peak counts of golden plover and pink-footed goose) will be specifically maintained on an annual basis to deliver adequate habitat to offset the loss of arable farmland used by golden plover and pink-footed goose. These would also be used by Skylark.

In addition, to minimise any potential for noise disturbance to otter using the River Derwent, River Ouse and Watercourse DE53, **Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1]** states that noise fencing will be utilised surrounding the HDD entry points.

The le would include the provision of species rich grassland beneath the solar PV panels, which would be suitable for grazing whilst offering greater species diversity than the existing arable land.

The Scheme would provide extensive planting of woodland, hedgerow and an orchard which would all provide increases ecological connectivity and habitat.

Habitat boxes will also be installed on suitable features (buildings and trees) within the Site to

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provided additional nesting and roosting opportunities for bats and a range of bird species, including barn owl. A number of reptile and amphibian hibernacula/refugia will also be provided.

The **Framework LEMP [EN010143/APP/7.14]** contains details of all ecological mitigation and enhancements. A detailed LEMP will be prepared in accordance with this and will be secured by a requirement in the DCO.

The Applicant is committed to exceeding the Government's 10% target for biodiversity net gain as set out in the Environment Act 2021. A **Biodiversity Net Gain (BNG) report [EN010143/APP/6.2]**, Natural England's Biodiversity Metric 4.0, has been produced for the DCO Application. This report demonstrates that the Scheme has the potential to deliver significant biodiversity net gain on the Site, with 80% gain predicted for habitat biodiversity units.

Paragraph 5.4.35

Applicants should include appropriate avoidance, mitigation, compensation and enhancement measures as an integral part of the proposed development. In particular, the applicant should demonstrate that:

- during construction, they will seek to ensure that activities will be confined to the minimum areas required for the works

Embedded design mitigation measures such as those set out in this policy are outlined in Section 8.6 of **Chapter 8: Ecology, ES Volume 2 [EN010143/APP/6.1]** and are illustrated within the **Framework CEMP [EN010143/APP/7.7]**, **Framework OEMP [EN010143/APP/7.8]** and **Framework DEMP [EN010143/APP/7.9]**. These

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	<ul style="list-style-type: none"> • 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. 	<p>include habitat avoidance, creation and replacement measures; mitigation relating to protected and notable species; and standard mitigation measures that comply with industry good practice and environmental legislation.</p> <p>Production of a final CEMP, OEMP and DEMP are will be secured by the DCO. The Framework CEMP [EN010143/APP/7.7] includes best practice measures to ensure that activities will be confined to the minimum areas required for the works during construction, in accordance with this part of the policy. Section 8.8 of Chapter 8: Ecology, ES Volume 2 [EN010143/APP/6.1] outlines mitigation measures pertaining to habitat avoidance, creation and replacement measures that comply with this part of the policy.</p>
Paragraph 5.4.36	Applicants should produce and implement a Biodiversity Management Strategy as part of their development proposals. This could include provision for biodiversity awareness training to employees and contractors so as to avoid unnecessary adverse impacts on biodiversity during the construction and operation stages.	<p>The management of biodiversity throughout the life of the Scheme is covered by the Framework CEMP [EN010143/APP/7.7], Framework OEMP [EN010143/APP/7.8] and Framework DEMP [EN010143/APP/7.9]. These will inform the CEMP, OEMP and DEMP with which the Scheme will comply with.</p> <p>The Framework CEMP [EN010143/APP/7.7], sets out that an Ecological Clerk of Works (ECoW) will provide advice about environmental and ecological issues during construction including for example, management of protected species,</p>

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Paragraph 5.4.39	<p>The government’s 25 Year Environment Plan and the Environment Act 2021 mark a step change in ambition for wildlife and the natural environment. The Secretary of State should have regard to the aims and goals of the government’s Environmental Improvement Plan and any relevant measures and targets, including statutory targets set under the Environment Act or elsewhere</p>	<p>surface water management, pollution, air quality and noise.</p> <hr/> <p>Chapter 8: Ecology, ES Volume 2 [EN010143/APP/6.1] has been produced with regard to the of the 25 Year Environment Plan, as evidenced by the extensive habitat to be provided pursuant to the Framework LEMP [EN010143/APP/7.14] which will inform a detailed LEMP, which will be secured by the DCO.</p> <p>The Applicant ha” also considered the Environment Act 2021, as evidenced by the Biodiversity Net Gain Assessment [EN010131/APP/7.9]. It is therefore considered that the Scheme is compliant with this policy.</p> <p>As a nationally significant NSIP, the Scheme also contributes to climate change mitigation, which in turn is beneficial for biodiversity and geological conservation interests.</p>
Paragraph 5.4.41	<p>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.</p>	<p>The Scheme pro70iodiversityber of biodiversity benefits as a result of its embedded mitigation and enhancement measures, as set out in the Framework LEMP [EN010143/APP/7.14].</p> <p>In addition, with these measures implemented, there are not anticipated to be any significant adverse impacts on biodiversity features.</p>

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		<p>The Applicant is committed to exceeding the Government’s 10% target for biodiversity net gain as set out in the Environment Act 2021. A Biodiversity Net Gain (BNG) report [EN010143/APP/6.2], Natural England’s Biodiversity Metric 4.0, has been produced for the DCO Application. This report demonstrates that the Scheme has the potential to deliver significant biodiversity net gain on the Site, with 80% gain predicted for habitat biodiversity units.</p>
<p>Paragraph 5.4.42</p>	<p>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 4.2 above). Where significant harm cannot be avoided, impacts should be mitigated and as a last resort, appropriate compensation measures should be sought.</p>	<p>As outlined in Chapter 8: Ecology, ES Volume 2 [EN010143/APP/6.1] with the application of mitigation measures no significant adverse effects have been identified on designated ecological sites, habitats or protected species during construction, operation or decommissioning of the Scheme.</p>
<p>Paragraph 5.4.43</p>	<p>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 and consent may be refused.</p>	<p>Embedded design mitigation measures are outlined in Section 8.6 of Chapter 8: Ecology, ES Volume 2 [EN010143/APP/6.1] and additional mitigation measures are outlined in section 8.8 of Chapter 8: Ecology, ES Volume 2 [EN010143/APP/6.1].</p> <p>The measures are illustrated within the Framework CEMP [EN010143/APP/7.7], Framework OEMP [EN010143/APP/7.8] and Framework DEMP [EN010143/APP/7.9]. These include habitat avoidance, creation and</p>

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		<p>replacement measures; mitigation relating to protected and notable species; and standard mitigation measures that comply with industry good practice and environmental legislation.</p> <p>Production of a final CEMP, OEMP and DEMP will be secured by the DCO.</p>
Paragraph 5.4.44	<p>The Secretary of State should consider what appropriate requirements should be attached to any consent and/or in any planning obligations entered into, in order to ensure that any mitigation or biodiversity net gain measures, if offered, are delivered and maintained. Any habitat creation or enhancement delivered including linkages with existing habitats for compensation or biodiversity net gain should generally be maintained for a minimum period of 30 years, or for the lifetime of the project, if longer.</p>	<p>The Framework CEMP [EN010143/APP/7.7], Framework OEMP [EN010143/APP/7.8], Framework DEMP [EN010143/APP/7.9], and Framework LEMP [EN010143/APP/7.14], set out measures to mitigate and achieve biodiversity net gain. These will be developed into detailed documents which will be secured by the DCO.</p>
Paragraph 5.4.46	<p>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.</p>	<p>As detailed in the Design and Access Statement [EN010143/APP/7.3], the Scheme has been subject to a detailed and sensitive iterative design process. This has taken account of the context and features of the land within the Order limits, nearby sensitive receptors and assets, information emerging from environmental surveys, feedback from stakeholders, and opportunities and constraints in order to develop a good design that balances the need to maximise the energy generation capacity of the Scheme, with the avoidance and mitigation of impacts, and provision</p>
Paragraph 5.4.47	<p>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</p>	

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	<p>delivering biodiversity net gain as part of or in addition to the approach set out at Section 4.5</p>	<p>of environmental and other enhancements, where practicable. The design process and principles are described in Design and Access Statement [EN010143/APP/7.3] and Design Principles Statement [EN010143/APP/7.4]. Il'cant'is committed to exceeding the Government's 10% target for biodiversity net gain as set out in the Environment Act 2021. A Biodiversity Net Gain (BNG) report [EN010143/APP/6.2], Natural England's Biodiversity Metric 4.0, has been produced for the DCO Application. This report demonstrates that the Scheme has the potential to deliver significant biodiversity net gain on the Site, with 80% gain predicted for habitat biodiversity units.</p>
<p>Paragraph 5.4.48</p>	<p>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</p>	<p>Appropriate weight has been 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, and an assessment of the Scheme's impact on these is set out in Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1]</p>
<p>Paragraph 5.4.49</p>	<p>The Secretary of State must consider whether the project may have a likely significant effect on a protected site which is part of the National Site Network (an HRA Site), a Marine Protected Area (MPA), or on any site to which the same protection is applied as a matter of policy,</p>	<p>The HRA [EN010143/APP/7.12] explains that whilst the 2019 Regulations make changes to the Habitats regime and terminology (e.g., by introducing the term 'national site network'), the HRA [EN010143/APP/7.12] continues to use the</p>

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	<p>either alone or in combination with other plans or projects.</p>	<p>term ‘European sites’ to refer to all Natura 2000 sites in line with current standard practice (comprising Special Areas of Conservation [SAC], Special Protection Areas [SPA]) potentially affected by the Scheme.</p> <p>The HRA [EN010143/APP/7.12] concludes that the Scheme would not result in any significant effects to the Lower Derwent Valley SPA/Ramsar and Humber Estuary SPA/Ramsar.</p> <p>The Scheme crosses the East Inshore MMO Marine Plan Area, the River Ouse, however there would not be any significant impact on this river as set out in the ES [EN010143/APP/6.1, 6.2, 6.3, 6.4]</p>
<p>Paragraph 5.4.50</p>	<p>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.</p>	<p>The Ecology chapter of the ES Chapter 8: Ecology, ES Volume 6 [EN010143/APP/6.1] provides information on how the project sought to avoid significant harm to biodiversity, and taken advantage of opportunities to conserve and enhance biodiversity. Chapter 8 of the ES includes embedded mitigation measures which aim to conserve and enhance biodiversity conservation interests.</p>
<p>Paragraph 5.4.53</p>	<p>The Secretary of State should give due consideration to such regional or local designations. However, given the need for new nationally significant infrastructure, these designations should not be used in themselves to refuse</p>	<p>The assessment in Section 8.7 of Chapter 8: Ecology, ES Volume 2 [EN010143/APP/6.1] of the likely significant impacts of the Scheme on designated sites and concludes that there are no</p>

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	development consent. Development will still be expected to comply with the biodiversity and geological conservation requirements set out in this NPS.	potential significant adverse effects as a result of the construction or operation of the Scheme on any sites of regional and local biodiversity and geological interest.
Paragraph 5.4.54	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 or veteran trees unless there are wholly exceptional reasons ¹⁹⁰ and a suitable compensation strategy exists.	<p>Chapter 8: Ecology, ES Volume 1 [EN101043/APP/6.1] concludes that there would be no loss of ancient woodland, or veteran or ancient trees as a result of the Scheme.</p> <p>As detailed in Appendix 10-5: Arboricultural Impact Assessment and Tree Protection Report, ES Volume 2 [EN010143/APP/6.2], two veteran trees and one ancient tree are subject to an incursion into their Root Protection Area (RPA) or canopy spread. In all cases, RPA incursions will be managed so that there will be no detrimental impacts on the health or amenity of retained trees.</p> <p>Chapter 8: Ecology, ES Volume 1 [EN101043/APP/6.1] also states that one ancient tree (T45) may require pruning to facilitate a temporary clearance for vehicular access. The final extent of pruning is to be agreed on site with an arboriculturist, but is not considered likely to result in a detrimental impact to the tree due to its species (crack willow) which is tolerant of pruning), good vitality and due to the existing clearance maintained over the existing hard surfaced access route.</p>

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		<p>As outlined in Chapter 8: Ecology, ES Volume 1 [EN101043/APP/6.1] the Scheme has been designed with the view to avoid key nature conservation and ecological features present within or adjacent to the Site as far as practicable. Accordingly, the following minimum buffers from key habitat features have been applied where practicable (e.g., some features such as hedgerows and waterbodies will be crossed):</p> <ol style="list-style-type: none"> a. 15m from woodlands (some cabling will lie within 15m of woodland); b. 10m from hedgerows increasing to 15m where there are hedgerow trees; c. 15m from individual trees;
<p>Paragraph 5.4.55</p>	<p>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.</p>	<p>There would be no residual significant adverse effects on any species and habitats as a result of the Scheme.</p>
<p>Paragraph 5.4.56</p>	<p>The Secretary of State should refuse consent where harm to the habitats or species and their habitats would result, unless the benefits (including need) of the development outweigh that harm. 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</p>	<p>There would be no residual significant adverse effects on any species and habitats as a result of the Scheme.</p> <p>The Applicant is committed to exceeding the Government's 10% target for biodiversity net gain as set out in the Environment Act 2021. A</p>

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	and the capacity of habitats to store carbon, which it considers may result from a proposed development	Biodiversity Net Gain (BNG) report [EN010143/APP/6.2] , Natural England’s Biodiversity Metric 4.0, has been produced for the DCO Application. This report demonstrates that the Scheme has the potential to deliver significant biodiversity net gain on the Site, with 80% gain predicted for habitat biodiversity units.
Aviation		
Paragraph 5.5.4	UK airspace is important for both civilian and military aviation interests. It is essential that new energy infrastructure is developed collaboratively alongside aerodromes, aircraft, air systems and airspace so that safety, operations and capabilities are not adversely affected by new energy infrastructure.	The Applicant consulted with the MoD, CAA, NATS, Brighton Airfield, Doncaster Sheffield Airport Limited, and York Flying School during the statutory consultation for the Scheme, which has informed the design of the Scheme.
Paragraph 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 4.2).	This is taken account in the glint and glare assessment, and a summary is presented in Chapter 16: Other Environmental Topics ES Volume 1 [EN010143/APP/6.1]
Paragraph 5.5.42	In addition, consideration of developments near aerodromes should take into account the following– factors <ul style="list-style-type: none"> - 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 	Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] takes account of impacts to birds. There are no buildings proposed as part of the Scheme, therefore building turbulence has not been assessed.

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	<p>infrastructure, buildings and other elements from energy installations, as well as environmental mitigation are designed in such a way so as not to increase the bird strike risk to the airport for developments within 13km (this can vary)200.</p> <ul style="list-style-type: none"> - 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. 	<p>The Scheme does not include cooling systems, therefore thermal plume turbulence is not considered to be relevant.</p>
<p>Paragraph 5.5.50</p>	<p>The Secretary of State should be satisfied that the effects on meteorological radars, civil and military aerodromes, aviation technical sites and other defence assets have been addressed by the applicant and that any necessary assessment of the proposal on aviation, NSWWS or defence interests has been carried out.</p>	<p>This is taken account in the glint and glare assessment, and a summary is presented in Chapter 16: Other Environmental Topics ES Volume 1 [EN010143/APP/6.1]</p>
<p>Paragraph 5.5.51</p>	<p>In particular, the Secretary of State should be satisfied that the proposal has been designed, where possible, to minimise adverse impacts on the operation and safety of aerodromes and that realistically achievable mitigation is</p>	<p>The Applicant has consulted with the MOD and NATS. The MOD concludes that they have no concerns due to the location for the Scheme falling outside of their safeguarding areas. The</p>

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carried out on existing surveillance systems such as radar / tracking technologies. It may also be appropriate for operators of the aerodrome to examine the possibility of agreeing to make reasonable changes to operational procedures

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NATS also note that they have examined the Scheme from a technical safeguarding aspect confirm that it and does not conflict with their safeguarding criteria. Accordingly, NATS (En Route“ Pub”ic Limited Company ("NERL") has no safeguarding objection to the proposal.

Chapter 16: Other environmental topics, ES Volume 1 [EN010143/APP/6.1] provides as assessment of glint and glare on aviation or defence interests. It states that four runway approach paths and one air traffic control tower were assessed in detail at Brighton Airfield. Only ‘Green Glare’ impacts (which is where there is a low potential for an ‘after image’) were predicted for Runway 28 at Brighton Airfield, which is an acceptable impact upon runways according to FAA guidance. The other receptors experience no impact. **Chapter 16: Other environmental topics, ES volume 1 [EN010143/APP/6.1]** concludes that overall aviation impacts are Low and Not Significant.

In addition, it sets out that following a review of the shortlisted cumulative developments presented in **Appendix 5-1, ES Volume 2 [EN010143/APP/6.2]** there are no other solar developments located within 2 km of the Solar PV Site to cause any potential cumulative effects,

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Paragraph 5.5.56

Lighting must also be designed in such a way as to ensure that there is no glare or dazzle to pilots and/or ATC, aerodrome ground lighting is not obscured and that any lighting does not diminish the effectiveness of aeronautical ground lighting and cannot be confused with aeronautical lighting

based on each having a maximum 1 km area of influence.

Consultation has been undertaken throughout and the consultees notified when relevant design changes were made. Further detail is contained within the **Consultation Report [EN010143/APP/5.1]**.

The lighting strategy is discussed in detail in **Chapter 2: The Scheme, ES Volume 1** and construction phase measures are further outlined in the Framework CEMP presented at **Appendix 2-1, ES Volume 2**. There will be minimal lighting as a result of the Scheme.

Chapter 16: Other environmental topics, ES Volume 1 [EN010143/APP/6.1] provides an assessment of glint and glare on aviation or defence interests. It states that four runway approach paths and one air traffic control tower were assessed in detail at Brighton Airfield. Only 'Green Glare' impacts (which is where there is a low potential for an 'after image') were predicted for Runway 28 at Brighton Airfield, which is an acceptable impact upon runways according to FAA guidance. The other receptors experience no impact. Chapter 16: Other environmental topics, ES volume 1 [EN010143/APP/6.1] concludes that overall aviation impacts are low and Not Significant.

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In addition, it sets out that following a review of the shortlisted cumulative developments presented in Appendix 5-1, ES Volume 2 [EN010143/APP/6.2] there are no other solar developments located within 2 km of the Solar PV Site to cause any potential cumulative effects, based on each having a maximum 1 km area of influence. Consultation has been undertaken throughout and the consultees notified when relevant design changes were made. Further detail is contained within the Consultation Report [EN010143/APP/5.1].

Flood Risk

Paragraph 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.

The ES includes an **FRA** and **Framework Surface Water Drainage Strategy** for the Scheme, and all impacts on the water environment are also assessed within **Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 [EN010143/APP/6.1]**.

The **FRA** is included as **Appendix 9-3, ES Volume 2 [EN010143/APP/6.2]**

A **Framework Surface Water Drainage Strategy** is included in **Appendix 9-4 ES Volume 2 [EN010143/APP/6.2]**.

Paragraph 5.8.9

If, following application of the Sequential Test, it is not possible, (taking into account wider sustainable

A **FRA** is provided at **Appendix 9-3, ES Volume 2 [EN01043/APP/6.2]**. This demonstrates how the

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Paragraph 5.8.10	<p>development objectives), for the project to be located in areas of lower flood risk the Exception Test can be applied, as required by Annex 3 of the Planning Practice Guidance.²¹² 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</p> <p>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 Areas of Outstanding Natural Beauty (AONBs), SSSIs and World Heritage Sites (WHS) which would not usually be considered appropriate</p>	<p>development passes the Sequential Test including its application at the site level.</p> <p>The majority of the Solar PV Site is located within Flood Zone 1 (lowest risk of fluvial flooding). However, the Solar PV Site also includes Solar PV Areas wholly within Flood Zone 2 (medium risk of fluvial flooding) and limited areas of Flood Zone 3 (high risk). There are small areas of ground water flooding susceptibility and surface water flooding risk also within the Solar PV Site. Given the risk of flooding within the Solar PV Site, the Sequential Test is required to be demonstrated.</p> <p>The Sequential Test Report appended to the FRA [EN010143/APP/6.2], sets out the assessment undertaken as part of the Sequential Test. It concludes that it is considered that no alternative sites are considered appropriate or reasonably available for the Scheme. Therefore, the Scheme satisfies the Sequential Test.</p>
Paragraph 5.8.11	<p>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:</p> <ul style="list-style-type: none"> • 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 	<p>The majority of the Grid Connection Corridor is located within high and medium risk of fluvial flooding (Flood zone 2 and 3). As set out in Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1], the majority of the land around the point of connection is flood zone 2 or 3 and as such there are no reasonable alternative routes for the Grid Connection Corridor outside of Flood Zone 2 and 3. Because of this,</p>

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elsewhere, and, where possible will reduce flood risk overall.

and the small number of solar PV infrastructure also proposed in Flood Zone 3, it is therefore necessary to apply the Exception Test.

The Scheme will provide wider sustainability benefits by contributing to energy security, affordability and helping to achieve the government targets for Net Zero, which outweigh flood risk, and appropriate mitigation has been considered to ensure that the Scheme remains operational and is safe during times of flooding. It has therefore been demonstrated that the Exception Test has been met.

The risk of surface water flooding to the majority of the Solar PV Site and Interconnecting Cable Corridor is considered to be 'very low'. There are a few areas where the risk is higher but these generally cover a small spatial extent. A

**Framework Surface Water Drainage Strategy
Appendix 9-4, ES Volume 2**

[EN010143/APP/6.2] incorporating SuDS has been prepared to manage these flow paths to ensure that the development remains safe throughout its lifetime.

The FRA details embedded mitigation measures alongside the **Framework Surface Water Drainage Strategy, Appendix 9-4 of Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 2 [EN010143/APP/6.2]**, to ensure that

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		<p>the project is appropriately flood resilient and resistant. The Framework CEMP [EN010143/APP/7.7] includes measures such as safe access and escape routes where required and ensures that any residual risk can be safely managed over the lifetime of the development.</p>
<p>Paragraph 5.8.12</p>	<p>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</p>	<p>Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 [EN010143/APP/6.1], and Flood Risk Assessment (FRA) Appendix 9-3, ES Volume 2 [EN01043/APP/6.2] provides a detailed assessment of the risk of flooding to and from the Scheme (taking account of climate change) and concludes that the risk of flooding will not be increased as a result of the construction, operation or decommissioning of the Scheme.</p>
<p>Paragraph 5.8.13</p>	<p>A site-specific flood risk assessment should be provided for all energy projects in Flood Zones 2 and 3 in England or Zones B and C in Wales. In Flood Zone 1 in England or Zone A in Wales, an assessment should accompany all proposals involving:</p> <ul style="list-style-type: none">• 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)	<p>Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 [EN010143/APP/6.1], and Flood Risk Assessment (FRA) Appendix 9-3, ES Volume 2 [EN01043/APP/6.2] provides a detailed assessment of the risk of flooding to and from the Scheme (taking account of climate change) and concludes that the risk of flooding will not be increased as a result of the construction, operation or decommissioning of the Scheme.</p>

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	<ul style="list-style-type: none"> • where the EA or NRW, Lead Local Flood Authority, Internal Drainage Board or other body have indicated that there may be drainage problems 	
Paragraph 5.8.14	This assessment should identify and assess the risks of all forms of flooding to and from the project and demonstrate how these flood risks will be managed, taking climate change into account	<p>Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 [EN010143/APP/6.1], and Flood Risk Assessment (FRA) Appendix 9-3, ES Volume 2 [EN01043/APP/6.2] provides a detailed assessment of the risk of flooding to and from the Scheme (taking account of climate change) and concludes that the risk of flooding will not be increased as a result of the construction, operation or decommissioning of the Scheme.</p>
Paragraph 5.8.15	<p>The minimum requirements for Flood Risk Assessments (FRA) are that they should:</p> <ul style="list-style-type: none"> • 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 	<p>A Flood Risk Assessment (FRA) is provided at Appendix 9-3, ES Volume 2 [EN01043/APP/6.2]. The FRA provides a detailed assessment of the risk of flooding to and from the Scheme (taking account of climate change) and concludes that the risk of flooding will not be increased as a result of the construction, operation or decommissioning of the Scheme. The FRA meets all the requirements set out within this policy.</p>

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other artificial features, together with the consequences of their failure and exceedance;

- consider the vulnerability of those using the site, including arrangements for safe access and escape;
- consider and quantify the different types of flooding (whether from natural and human sources and including joint and cumulative effects) and include information on flood likelihood, speed-of-onset, depth, velocity, hazard and duration;
- identify and secure opportunities to reduce the causes and impacts of flooding overall, making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management;
- consider the effects of a range of flooding events including extreme events on people, property, the natural and historic environment and river and coastal processes;
- include the assessment of the remaining (known as 'residual') risk after risk reduction measures have been taken into account and demonstrate that these risks can be safely managed, ensuring people will not be exposed to hazardous flooding;
- consider how the ability of water to soak into the ground may change with development, along with how the proposed layout of the project may affect drainage systems. Infation should include:
 7. i. Describe the existing surface water drainage arrangements for the site

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- ii. Set out (approximately) the existing rates and volumes of surface water run-off generated by the site. Detail the proposals for restricting discharge rates
 - iii. Set out proposals for managing and discharging surface water from the site using sustainable drainage systems and accounting for the predicted impacts of climate change. If sustainable drainage systems have been rejected, present clear evidence of why their inclusion would be inappropriate
 - iv. Demonstrate how the hierarchy of drainage options has been followed.
 - v. Explain and justify why the types of SuDS217 and method of discharge have been selected and why they are considered appropriate. Where cost is a reason for not including SuDS, provide information to enable comparison with the lifetime costs of a conventional public sewer connection
 - vi. Explain how sustainable drainage systems have been integrated with other aspects of the development such as open space or green infrastructure, so as to ensure an efficient use of the site
 - vii. Describe the multifunctional benefits the sustainable drainage system will provide
 - viii. Set out which opportunities to reduce the causes and impacts of flooding have been identified and included as part of the proposed sustainable drainage system
 - ix. Explain how run-off from the completed development will be prevented from causing an impact elsewhere
 - x. Explain how the sustainable drainage system been designed to facilitate maintenance and, where relevant,

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	<p>adoption. Set out plans for ensuring an acceptable standard of operation and maintenance throughout the lifetime of the development</p> <ul style="list-style-type: none"> • 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 	
<p>Paragraph 5.8.17</p>	<p>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:</p> <ul style="list-style-type: none"> • Access, clearances and sufficient land are retained to enable their maintenance, repair, operation, and replacement, as necessary • Their standard of protection is not reduced • Their condition or structural integrity is not reduced 	<p>Chapter 9: Flood Risk, Drainage and Surface Water, ES Volume 1 [EN010143/APP/6.1] presents the assessment of the likely significant effects on surface water bodies (e.g. rivers, streams, ditches, canals, lakes and ponds) including water quality and hydromorphology, flood risk and drainage.</p> <p>The submitted Framework Surface Water Drainage Strategy Appendix 9-4, ES Volume 2 [EN010143/APP/6.2], includes SuDS provision. It is predicted at this stage that there would be a negligible impact to any receiving water feature from surface water runoff.</p>
<p>Paragraph 5.8.18</p>	<p>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,</p>	<p>A FRA is provided at Appendix 9-3, ES Volume 2 [EN01043/APP/6.2]. The preparation of the FRA, and the ES has taken account of advice and consultation with key bodies, including the</p>

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	<p>other bodies such as Lead Local Flood Authorities, Internal Drainage Boards, sewerage undertakers, navigation authorities, highways authorities and reservoir owlers and operators.</p>	<p>Environment Agency and Lead Local Flood Authorities (LLFAs). The following statutory consultees listed below have provided comment on flood risk and drainage:</p>
<p>Paragraph 5.8.19</p>	<p>Such discussions should identify the likelihood and possible extent and nature of the flood risk, help scope the FRA, and identify the information that will be required by the Secretary of State to reach a decision on the application when it is submitted. The Secretary of State should advise applicants to undertake these steps where they appear necessary but have not yet been addressed.</p>	<ul style="list-style-type: none"> a. East Riding of Yorkshire Council (LLFA); b. North Yorkshire Council (LLFA); c. Yorkshire Water; d. Canal and Rivers Trust; e. The Selby Area Internal Drainage Board;
<p>Paragraph 5.8.20</p>	<p>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.</p>	<ul style="list-style-type: none"> f. Yorkshire and Humber Drainage Boards; g. Ouse and Humber Drainage Boards; and h. The Environment Agency.
<p>Paragraph 5.8.21</p>	<p>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</p>	<p>The FRA [EN010143/APP/6.2], and Sequential Test Report (Annex to FRA) demonstrates that the Sequential Test has been met for the Solar PV Site, which is predominantly located in Flood Zone 1, with small parts located in Flood Zone 2 and 3. It also demonstrates that the Sequential and Exception Tests are met for the Grid Connection Corridor and part of the Solar PV Site, which is located within Flood Zone 3.</p>
<p>Paragraph 5.8.23</p>	<p>Consideration of alternative sites should take account of the policy on alternatives set out in Section 4.2 above. All</p>	

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Paragraph 5.8.24	<p>projects should apply the Sequential Test to locating development within the site</p> <p>To satisfactorily manage flood risk, arrangements are required to manage surface water and the impact of the natural water cycle on people and property.</p>	<p>Chapter 9: Flood Risk, Drainage and Surface Water, ES Volume 1 [EN010143/APP/6.1] presents the assessment of the likely significant effects on surface water bodies (e.g. rivers, streams, ditches, canals, lakes and ponds) including water quality and hydromorphology, flood risk and drainage. The chapter concludes that the Scheme will remain safe throughout its lifetime and will not increase the risk of flooding elsewhere and will be resilient to flooding with the implementation of mitigation measures secured via requirements.</p> <p>The FRA details embedded mitigation measures alongside the Framework Surface Water Drainage Strategy, Appendix 9-4 of Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 2 [EN010143/APP/6.2] which will be secured by the DCO and how these will be implemented during the construction, operation or decommissioning phases.</p>
Paragraph 5.8.25	<p>In this NPS, the term SuDS refers to the whole range of sustainable approaches to surface water drainage management including, where appropriate:</p>	<p>The Framework Surface Water Drainage Strategy, Appendix 9-4, ES Volume 2 [EN010143/APP/6.2] sets out the proposed strategy for surface water and drainage, which will be secured by requirements of the DCO. Mitigation measures such as the use of localised</p>

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	<ul style="list-style-type: none"> a. source control measures including rainwater recycling and drainage b. infiltration devices to allow water to soak into the ground, that can include individual soakaways and communal facilities c. filter strips and swales, which are vegetated features that hold and drain water downhill mimicking natural drainage patterns d. filter drains and porous pavements to allow rainwater and run-off to infiltrate into permeable material below ground and provide storage if needed e. basins ponds and tanks to hold excess water after rain and allow controlled discharge that avoids flooding <p>flood routes to carry and direct excess water through developments to minimise the impact of severe rainfall flooding</p>	<p>SuDS, such as swales and infiltration trenches, will be used to control runoff if required.</p>
Paragraph 5.8.26	<p>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</p>	<p>The FRA details embedded mitigation measures alongside the Framework Surface Water Drainage Strategy, Appendix 9-4 of Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 2 [EN010143/APP/6.2] which will be secured by requirements of the DCO and how these will be implemented during the construction, operation or decommissioning phases.</p>
Paragraph 5.8.27	<p>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</p>	

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	<p>leaving the site are no greater than the rates prior to the proposed project, unless specific off-site arrangements are made and result in the same net effect.</p>	<p>The Scheme therefore will remain safe throughout its lifetime and will not increase the risk of flooding elsewhere and will be resilient to flooding with the implementation of mitigation measures secured via requirements</p>
<p>Paragraph 5.8.28</p>	<p>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.</p>	<p>The Framework Surface Water Drainage Strategy, Appendix 9-4, ES Volume 2 [EN010143/APP/6.2] sets out the proposed strategy for surface water and drainage, which will be secured by requirements of the DCO. Mitigation measures such as the use of localised SuDS, such as swales and infiltration trenches, will be used to control runoff if required.</p>
<p>Paragraph 5.8.29</p>	<p>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</p>	<p>The FRA [EN010143/APP/6.2], and Sequential Test Report (Annex to FRA) demonstrates that the Sequential Test has been met for the Solar PV Site, which is predominantly located in Flood Zone 1, with small parts located in Flood Zone 2 and 3. It also demonstrates that the Sequential and Exception Tests are met for the Grid Connection Corridor and part of the Solar PV Site, which is located within Flood Zone 3.</p> <p>The Framework Surface Water Drainage Strategy, Appendix 9-4, ES Volume 2 [EN010143/APP/6.2] sets out the proposed strategy for surface water and drainage, which will be secured by requirements of the DCO. Mitigation measures such as the use of localised</p>

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Paragraph 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.	<p>SuDS, such as swales and infiltration trenches, will be used to control runoff if required.</p> <p>To compensate for the approximate 150 m³ of floodplain volume lost as a result of the Scheme, flood compensation is proposed along the edge of Flood Zone 3 to provide this storage. The floodplain compensation indicative area can be seen in Figure 9-4, ES Volume 3 [EN010143/APP/6.3]. The precise location and design of the compensation area will be determined at detailed design. Following decommissioning of the Scheme, the compensation area will be reinstated to a flat field as existing.</p>
Paragraph 5.8.31	Where it is not possible to provide compensatory storage on site, it may be acceptable to provide it off-site if it is hydraulically and hydrologically linked. Where development may cause the deflection or constriction of flood flow routes, these will need to be safely managed within the site.	<p>To compensate for the approximate 150 m³ of floodplain volume lost as a result of the Scheme, flood compensation is proposed along the edge of Flood Zone 3 to provide this storage. The floodplain compensation indicative area can be seen in Figure 9-4, ES Volume 3 [EN010143/APP/6.3]. The precise location and design of the compensation area will be determined at detailed design. Following decommissioning of the Scheme, the compensation area will be reinstated to a flat field as existing.</p>
Paragraph 5.8.32	Where development may contribute to a cumulative increase in flood risk elsewhere, the provision of	Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 [EN010143/APP/6.1]

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	<p>multifunctional sustainable drainage systems, natural flood management and green infrastructure can also make a valuable contribution to mitigating this risk whilst providing wider benefits.</p>	<p>sets out that provided that standard and good practice mitigation is implemented on the construction sites through their respective CEMPs and as per the conditions of the relevant planning permission, environmental permits and licences as is being proposed for this Scheme, the cumulative effects risk can be effectively managed and there would not be a significant increase in the risks to any relevant waterbodies during construction.</p> <p>In addition, provided that all the mitigation measures are implemented for all schemes, then the cumulative impacts from the Scheme and any cumulative schemes would not be anticipated to produce any significant effects during operation.</p>
Paragraph 5.8.33	<p>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.</p>	<p>The Contractor would be required to produce an Emergency Response Plan as part of the detailed CEMP (Secured through the DCO). This is set out in the FRA (Appendix 9-3, ES Volume 2 [EN010143/APP/6.2]).</p>
Paragraph 5.8.34	<p>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</p>	

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Paragraph 5.8.35	Flood resistant and resilient materials and design should be adopted to minimise damage and speed recovery in the event of a flood.	The Scheme has been designed to be resilient and resistant to flooding and would minimise damage and speed recovery in the event of a flood. This is set out in the Design and Access Statement [EN010143/APP/7.3].
Paragraph 5.8.36	<p>In determining an application for development consent, the Secretary of State should be satisfied that where relevant:</p> <ul style="list-style-type: none"> • the application is supported by an appropriate FRA • the Sequential Test has been applied and satisfied as part of site selection • a sequential approach has been applied at the site level to minimise risk by directing the most vulnerable uses to areas of lowest flood risk • the proposal is in line with any relevant national and local flood risk management strategy²²³ • SuDS (as required in the next paragraph on National Standards) have been used unless there is clear evidence that their use would be inappropriate • in flood risk areas the project is designed and constructed to remain safe and operational during its lifetime, without increasing flood risk elsewhere (subject to the exceptions set out in paragraph 5.8.18) • the project includes safe access and escape routes where required, as part of an agreed emergency plan, and that any residual risk can be safely managed over the lifetime of the development • land that is likely to be needed for present or future flood risk management infrastructure has been 	<p>A FRA is provided at Appendix 9-3, ES Volume 2 [EN01043/APP/6.2]. This demonstrates how the development passes the Sequential Test including its application at the site level.</p> <p>The majority of the Solar PV Site is located within Flood Zone 1 (lowest risk of fluvial flooding). However, the Solar PV Site also includes Solar PV Areas wholly within Flood Zone 2 (medium risk of fluvial flooding) and limited areas of Flood Zone 3 (high risk). There are small areas of ground water flooding susceptibility and surface water flooding risk also within the Solar PV Site. Given the risk of flooding within the Solar PV Site, the Sequential Test is required to be demonstrated.</p> <p>The Sequential Test Report appended to the FRA [EN010143/APP/6.2], sets out the assessment undertaken as part of the Sequential Test. It concludes that it is considered that no alternative sites are considered appropriate or reasonably available for the Scheme. Therefore, the Scheme satisfies the Sequential Test.</p> <p>The majority of the Grid Connection Corridor is located within high and medium risk of fluvial</p>

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appropriately safeguarded from development to the extent

flooding (Flood zone 2 and 3). As set out in **Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1]**, the majority of the land around the point of connection is flood zone 2 or 3 and as such there are no reasonable alternative routes for the Grid Connection Corridor outside of Flood Zone 2 and 3. Because of this, and the small number of solar PV infrastructure also proposed in Flood Zone 3, it is therefore necessary to apply the Exception Test.

The Scheme will provide wider sustainability benefits by contributing to energy security, affordability and helping to achieve the government targets for Net Zero, which outweigh flood risk, and appropriate mitigation has been considered to ensure that the Scheme remains operational and is safe during times of flooding. It has therefore been demonstrated that the Exception Test has been met.

The risk of surface water flooding to the majority of the Solar PV Site and Interconnecting Cable Corridor is considered to be 'very low'. There are a few areas where the risk is higher but these generally cover a small spatial extent. A **Framework Surface Water Drainage Strategy Appendix 9-4, ES Volume 2 [EN010143/APP/6.2]** incorporating SuDS has been prepared to manage these flow paths to

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		<p>ensure that the development remains safe throughout its lifetime.</p> <p>The FRA details embedded mitigation measures alongside the Framework Surface Water Drainage Strategy, Appendix 9-4 of Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 2 [EN010143/APP/6.2], to ensure that the project is appropriately flood resilient and resistant. The Framework CEMP [EN010143/APP/7.7] includes measures such as safe access and escape routes where required and ensures that any residual risk can be safely managed over the lifetime of the development</p>
Paragraph 5.8.38	<p>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.</p>	<p>The Framework OEMP [EN010143/APP/7.8] and Framework Surface Water Drainage Strategy, Appendix 9-4, ES Volume 2 [EN010143/APP/6.2] sets out the operation and maintenance of any SuDS throughout the projects lifetime.</p>
Paragraph 5.8.41	<p>Energy projects should not normally be consented within Flood Zone 3b, or Zone C2 in Wales, or on land expected to fall within these zones within its predicted lifetime. This may also apply where land is subject to other sources of flooding (for example surface water). However, where essential energy infrastructure has to be located in such areas, for operational reasons, they should only be consented if the development will not</p>	<p>The FRA [EN010143/APP/6.2], and Sequential Test Report (Annex to FRA) demonstrates that the Sequential Test has been met for the Solar PV Site, which is predominantly located in Flood Zone 1, with small parts located in Flood Zone 2 and 3. It also demonstrates that the Sequential and Exception Tests are met for the Grid Connection Corridor and part of the Solar PV Site, which is located within Flood Zone 3.</p>

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result in a net loss of floodplain storage, and will not impede water flows.

The Scheme would not result in a net loss of floodplain storage and would not impede water flows.

Paragraph 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.

The Scheme would not result in an increase in flood risk else.

The Scheme will provide wider sustainability benefits by contributing to energy security, affordability and helping to achieve the government targets for Net Zero, which outweigh flood risk, and appropriate mitigation has been considered to ensure that the Scheme remains operational and is safe during times of flooding.

Historic Environment

Paragraph 5.9.7

The Secretary of State should also consider the impacts on other non-designated heritage assets (as identified either through the development plan making process by plan-making bodies, including 'local listing', or through the application, examination and decision making process). This is on the basis of clear evidence that such heritage assets have a significance that merits consideration in that process, even though those assets are of lesser significance than designated heritage assets.

An assessment of potential impacts resulting from the proposed development is made within section 7.7 of **Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1]**. This provides an assessment of impacts on non-designated heritage assets.

Evaluation fieldwork surveys have been undertaken to allow the Applicant to enhance the baseline understanding of cultural heritage assets including their potential value. The results of the

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fieldwork surveys are included in the ES and the reports submitted with the DCO application and also, ultimately, lodged with the relevant local planning authority Historic Environment Record.

Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] concludes that the Scheme would result in significant effects to eight non-designated heritage assets. These comprise of Hagthorpe moated site, which is a non-designated asset of schedulable quality, the historic farmstead at Johnson's Far, and six archaeological assets (six areas of Romano-British settlement archaeology). Therefore, additional mitigation in the form of a programme of archaeological excavation and recording is proposed, and will be set out in an Overarching Written Scheme of Investigation for Archaeological Mitigation.

It is acknowledged that while archaeological excavation and recording would not minimise the physical impact to these assets, as the archaeological evidence would still be removed, it would compensate for their loss by preserving them by record; thereby allowing their continued study and achieving greater understanding and appreciation of their heritage value. This would reduce the magnitude of impact on individual assets, resulting in a residual minor adverse effect, which is not significant.

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Paragraph 5.9.9	The applicant should undertake an assessment of any likely significant heritage impacts of the proposed development as part of the EIA and describe these in the ES (see Section 4.2). 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	Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] contains a clear and detailed assessment of likely impacts and effects of the Scheme on cultural heritage including cumulative effects.
Paragraph 5.9.11	Where a site on which development is proposed includes, or the available evidence suggests it has the potential to include, heritage assets with an archaeological interest, the applicant should carry out appropriate desk-based assessment and, where such desk-based research is insufficient to properly assess the interest, a field evaluation. Where proposed development will affect the setting of a heritage asset, accurate representative visualisations may be necessary to explain the impact.	Archaeological evaluations were undertaken in addition to a cultural heritage desk-based assessment, Appendix 7-2, ES Volume 2 [EN010143/APP/6.2] , including a geophysical survey and report (detailed magnetometry), Appendix 7-3, ES Volume 2 [EN010143/APP/6.2] , of the whole Scheme and targeted trial trenching
Paragraph 5.9.12	The applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents. Studies will be required on those heritage assets affected by noise, vibration, light and indirect impacts, the extent and	Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] sets out an assessment of the Scheme on Cultural Heritage, in accordance with this policy. An assessment of the impact of the Scheme on the value (heritage significance) of heritage assets

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	detail of these studies will be proportionate to the significance of the heritage asset affected	is discussed in Section 7.7 of Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] . The ES considers impacts arising from noise, vibration and lighting.
Paragraph 5.9.13	<p>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:</p> <ul style="list-style-type: none">• enhancing, through a range of measures such a sensitive design, the significance of heritage assets or setting affected• considering where required the development of archive capacity which could deliver significant public benefits• considering how visual or noise impacts can affect heritage assets, and whether there may be opportunities to enhance access to, or interpretation, understanding and appreciation of, the heritage assets affected by the scheme	<p>Section 7.6 of Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] outlines the avoidance and mitigation measures embedded within the Scheme design in relation to cultural heritage.</p> <p>It sets out that physical impacts to known heritage assets within the Order limits have been avoided by the Scheme design, where practicable. This includes the avoidance of the moated site east of Gribthorpe (MHU3206), a non designated heritage asset.</p> <p>The planning of construction and decommissioning traffic routes and modes of transport have sought to reduce impacts to numerous receptors, including the town of Howden.</p> <p>The Order limits have been designed to avoid or minimise potential changes to the setting of designated heritage assets, including Grade I, Grade II* and Grade II listed buildings.</p> <p>Mitigation also includes the careful siting of the construction compounds within the Solar PV Areas and the chosen colour palette for above-ground</p>

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components, which will be green to reflect the prevailing landscape.

As set out in the **Framework LEMP [EN010143/APP/7.14]**, the Scheme would include management of existing woodland and hedgerows (including important hedgerows) to ensure historic boundaries are protected, whilst also increasing the level of screening from visual receptors.

Furthermore, the nature of the landscape, comprising many hedgerow boundaries and areas of tree planting, and restricted views of the land within the Order limits reduces the potential for heritage assets to experience change as a result of the Scheme's construction.

Paragraph 5.9.14

Careful consideration in preparing the scheme will be required on whether the impacts on the historic environment will be direct or indirect, temporary or permanent

Chapter 7: Cultural Heritage, ES Volume1 [EN010143/APP/6.1] contains a clear assessment of likely impacts and effects of the Scheme on cultural heritage, including whether such effects are likely to be direct or indirect, temporary or permanent. There would be no significant effects on designated heritage assets. Generally, impacts of the Scheme on non-designated heritage assets would be indirect, on their setting, and assessed to be not significant after additional mitigation. Setting impacts would also be reversed following decommissioning.

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Paragraph 5.9.15	Applicants should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably	<p>There are no World Heritage Sites affected by the Scheme.</p> <p>Section 7.7 of Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] includes an assessment of Howden Conservation Area as part of the consideration of Howden Minster, including the kinetic experience of approaches to and from Howden, and those views which assist in appreciating the location of the town in its wider landscape setting. This detailed consideration concluded that the Solar PV Site did not form an identifiable, or important, element of the setting of the conservation area, and, as such, the presence of the operational Scheme would constitute no impact resulting in no effect.</p> <p>The Scheme therefore does not lead to significant adverse effects to a World Heritage Site or Conservation Area, in accordance with this policy.</p>
Paragraph 5.9.22	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.	<p>The particular nature of the significant of heritage assets affected by the Scheme are set out in Chapter 7: Cultural Heritage, ES, Volume 1 [EN010143/APP/6.1], as well as an assessment of effects on these assets.</p>
Paragraph 5.9.25	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	<p>Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] concludes that there will be no residual significant effect on any designated</p>

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	<p>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.</p>	<p>heritage assets or their setting as a result of the Scheme. Embedded mitigation measures have reduced the effects on heritage assets and ensures preservation of those assets.</p> <p>The Heritage Statement (Appendix D of this Planning Statement) also concludes that the Scheme would not lead to any loss or substantial harm to any designated heritage assets.</p>
<p>Paragraph 5.9.26</p>	<p>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.</p>	<p>Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] concludes that there will be no residual significant effect on any designated heritage assets or their setting as a result of the Scheme, including listed buildings, registered park and gardens, scheduled monuments, protected wreck sites, registered battlefields etc.</p>
<p>Paragraph 5.9.27</p>	<p>Substantial harm to or loss of significance of a grade II Listed Building or a grade II Registered Park or Garden should be exceptional.</p>	<p>Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] concludes that the Scheme would result in significant effects to eight non-designated heritage assets. These comprise of Hagthorpe moated site, which is a non-designated asset of schedulable quality, the historic farmstead at Johnson’s Far, and six archaeological assets (six areas of Romano-British settlement archaeology). Therefore, additional mitigation in the form of a programme of archaeological excavation and recording is proposed, and will be set out in an Overarching Written Scheme of Investigation for Archaeological Mitigation.</p>
<p>Paragraph 5.9.28</p>	<p>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</p>	

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It is acknowledged that while archaeological excavation and recording would not minimise the physical impact to these assets, as the archaeological evidence would still be removed, it would compensate for their loss by preserving them by record; thereby allowing their continued study and achieving greater understanding and appreciation of their heritage value. This would reduce the magnitude of impact on individual assets, resulting in a residual minor adverse effect, which is not significant.

The effects above are outweighed by the very significant public benefits of the Scheme which are set out in section 5.3 of this Planning Statement, when considered in isolation and cumulatively with other adverse effects of the Scheme.

Paragraph 5.9.29

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

Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] concludes that there will be no residual significant effect on any designated heritage assets or their setting as a result of the Scheme. Embedded mitigation measures have reduced the effects on heritage assets and ensures preservation of those assets.

The **Heritage Statement (Appendix D of this Planning Statement)** also concludes that the Scheme would not lead to any loss or substantial harm to any designated heritage assets.

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- conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible
- the harm or loss is outweighed by the benefit of bringing the site back into use

Paragraph 5.9.30

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.

Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] concludes that there will be no residual significant effect on any designated heritage assets or their setting as a result of the Scheme. Embedded mitigation measures have reduced the effects on heritage assets and ensures preservation of those assets.

The **Heritage Statement (Appendix D of this Planning Statement)** also concludes that the Scheme would not lead to any loss or substantial harm to any designated heritage assets.

Paragraph 5.9.31

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

Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] concludes that the Scheme would result in significant effects to eight non-designated heritage assets. These comprise of Hagthorpe moated site, which is a non-designated asset of schedulable quality, the historic farmstead at Johnson's Far, and six archaeological assets (six areas of Romano-British settlement archaeology). Therefore, additional mitigation in the form of a programme of archaeological excavation and recording is proposed, and will be

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set out in an Overarching Written Scheme of Investigation for Archaeological Mitigation.

It is acknowledged that while archaeological excavation and recording would not minimise the physical impact to these assets, as the archaeological evidence would still be removed, it would compensate for their loss by preserving them by record; thereby allowing their continued study and achieving greater understanding and appreciation of their heritage value. This would reduce the magnitude of impact on individual assets, resulting in a residual minor adverse effect, which is not significant.

The effects above are outweighed by the very significant public benefits of the Scheme which are set out in section 5.3 of this Planning Statement, when considered in isolation and cumulatively with other adverse effects of the Scheme

Paragraph 5.9.32

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 or less than substantial harm under paragraph 5.9.29 or less than substantial harm under paragraph 5.9.30, as appropriate, considering the relative significance of the element

There are no World Heritage Sites affected by the Scheme.

Section 7.7 of Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] includes an assessment of Howden Conservation Area as part of the consideration of Howden Minster, including the kinetic experience of approaches to and from Howden, and those views which assist in appreciating the location of the town in its wider

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affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

landscape setting. This detailed consideration concluded that the Solar PV Site did not form an identifiable, or important, element of the setting of the conservation area, and, as such, the presence of the operational Scheme would constitute no impact resulting in no effect.

The Scheme therefore does not lead to significant adverse effects to a World Heritage Site or Conservation Area, in accordance with this policy.

Paragraph 5.9.34

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.

Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] concludes that there will be no residual significant effect on any designated heritage assets or their setting as a result of the Scheme. Embedded mitigation measures have reduced the effects on heritage assets and ensures preservation of those assets.

The **Heritage Statement (Appendix D of this Planning Statement)** also concludes that the Scheme would not lead to any loss or substantial harm to any designated heritage assets

Landscape and Visual

Paragraph 5.10.6

Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.

While the appearance of solar panels is largely set by their function, the site layout, landscaping and access design have all been designed to reflect good design principles.

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Good design has been a key consideration from the outset. The LVIA has informed the iterative design process, which is set out in the **Design and Access Statement [EN010143/APP/7.3]**. The Scheme layout and design has been developed in response to policy requirements, published landscape character assessment guidance and fieldwork analysis. The design mitigation has been embedded in the Scheme to minimise effects on landscape character and visual amenity as shown in the Framework LEMP [EN010143/APP/7.14]. This will inform a detailed LEMP which will be secured by the DCO. The landscape design principles aim to achieve the following:

- i. Careful siting in the landscape
- j. Conserving the existing vegetation patterns
- k. Creating new green infrastructure
- l. Sensitive Design in Relation to Form, Colour, and Materials
- m. Sensitive Design of Lighting

Paragraph 5.10.7

National Parks, the Broads and AONBs have been confirmed by the government as having the highest status of protection in relation to landscape and natural beauty. Each of these designated areas has specific statutory purposes which help ensure their continued

The Scheme is not located within any of these designations and **Chapter 10: Landscape and Visual Amenity, ES Volume 1 [EN010143/APP/6.1]** confirms there are no

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protection and which the Secretary of State should have regard to in their decisions

national landscape designation affected by the Scheme.

Paragraph 5.10.11

Outside nationally designated areas, there are local landscapes that may be highly valued locally. Where a local development document in England or a local development plan in Wales has policies based on landscape or waterscape character assessment, these should be paid particular attention. However, locally valued landscapes should not be used in themselves to refuse consent, as this may unduly restrict acceptable development.

Chapter 10: Landscape and Visual Amenity, ES Volume 1 [EN010143/APP/6.1] identifies that the Solar PV Site is not located within or close to any locally designated landscapes. The assessment has considered the Local Character Assessments undertaken by North Yorkshire, Selby District and East Riding of Yorkshire.

Chapter 10: Landscape and Visual Amenity, ES Volume 1 [EN010143/APP/6.1] concludes that it is not considered that the Scheme would result in significant landscape effects to local Landscape Character Areas during construction.

The assessment of likely impacts and effects (with embedded mitigation in place) has determined that the Scheme is likely to result in a significant adverse effect on the Howden to Bubwith LCA 5A during Operation Year 1 and Year 15 reducing to not significant during decommissioning. The Scheme is likely to result in a significant adverse effect on the West of Holme on Spalding Moor Farmland LCA 5B during Operation Year 1, with effects reducing to not significant during operation and decommissioning. It is assessed that none of the remaining character areas will experience significant effects at all assessment scenarios.

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Paragraph 5.10.12	All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites.	<p>It is considered that the limited and reversible landscape and visual effects of the Scheme are clearly and comprehensively outweighed by the benefits of the Scheme in terms of delivering renewable energy infrastructure which is urgently needed in order to create a secure and affordable energy system and to help combat climate change. Therefore, in accordance with this policy, the level of landscape impacts are not considered to be so damaging that they are not offset by the benefits of the Scheme</p>
Paragraph 5.10.13	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.	<p>Chapter 10: Landscape and Visual Amenity, ES Volume 1 [EN010143/APP/6.1] assesses the visual impacts of the Scheme. Through consultation with the relevant stakeholders, 29 viewpoints were chosen to illustrate the typical range of views of the Scheme as experienced from settlements, publicly accessible roads, and PRoW towards the Scheme. These representative viewpoints are illustrated on Figure 10-7: Representative Viewpoint Locations Plan, ES Volume 3 [EN010143/APP/6.3].</p> <p>The design mitigation which is outlined in section 10.6 of Chapter 10: Landscape and Visual Amenity, ES Volume 1 [EN010143/APP/6.1]; the Framework LEMP [EN010143/APP/7.14] and</p>

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the Design and Access Statement

[EN010143/APP/7.3] includes, but is not limited to, offsets from properties and local roads/PRoW; underground cabling within the Interconnecting Cable Corridor and Grid Connection Corridor; the height of the Solar PV panels;; and design of fencing which has aimed to reduce the visual impact of the Scheme upon sensitive receptors.

Significant adverse effects are predicted for visual receptors during construction and decommissioning however these are temporary effects.

During operation (Year 1), 10 of the viewpoints (3, 4, 5, 6, 7, 10a, 10b, 11, 14 and 19) and users of the Howden 20 long distance route will experience significant adverse effects, By Year 15 of operation these effects are reduced to not significant as a result of the establishment of proposed mitigation, enhancement and replacement planting and the management of existing hedgerow.

Given the size of the Scheme and the limited and localised visual effects predicted upon receptors, the Scheme's visual effects are clearly outweighed by the substantial benefits of the Scheme presented in Section 5 of the **Planning Statement [EN010143/APP/7.2]**, in particular the national

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		<p>benefit of large scale renewable energy infrastructure which is urgently needed in order to create a secure and affordable energy system and to help combat climate change. Therefore, in accordance with this policy, the level and nature of visual impacts are not considered to outweigh the benefits of the Scheme.</p>
Paragraph 5.10.15	<p>The applicant should carry out a landscape and visual impact assessment and report it in the ES, including cumulative effects (see Section 4.2). Several guides have been produced to assist in addressing landscape issues.</p>	<p>A Landscape and Visual Impact Assessment has been undertaken within Chapter 10: Landscape and Visual, ES Volume 1 [EN010143/APP/6.1] which includes cumulative effects, in accordance with Paragraph 5.10.16.</p>
Paragraph 5.10.16	<p>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.</p>	
Paragraph 5.10.18	<p>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 both negative effects have been minimised and opportunities for creating positive benefits or enhancement have been recognised.</p>	<p>Good design has been a key consideration from the outset and has shaped the design, layout and landscape design as discussed in the Design and Access Statement [EN010143/APP/7.3]. Landscape and visual matters have been considered throughout the design evolution. The Design and Access Statement [EN010143/APP/7.3] details how the site was</p>

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Paragraph 5.10.19	The assessment should include the effects on landscape components and character during construction and operation. For projects which may affect a National Park, The Broads or an Areas of Outstanding Natural Beauty the assessment should include effects on the natural beauty and special qualities of these areas'	<p>chosen, and how design objectives and principles have been developed for the Scheme.</p> <hr/> <p>This is assessed in Section 10.7 – Assessment of Likely Impacts and Effects of Chapter 10: Landscape and Visual Amenity, ES Volume 1 [EN010143/APP/6.1].</p> <p>The Scheme would not affect a National Park, the Broads or Areas of Outstanding Natural Beauty.</p>
Paragraph 5.10.20	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 local amenity, and nature conservation.	<p>This is assessed in Section 10.7 – Assessment of Likely Impacts and Effects of Chapter 10: Landscape and Visual Amenity, ES Volume 1 [EN010143/APP/6.1].</p>
Paragraph 5.10.21	The assessment should also demonstrate how noise and light pollution, and other emissions (see Section 5.2 and Section 5.7), from construction and operational activities on residential amenity and on sensitive locations, receptors and views, will be minimised.	<p>Noise and light pollution have been minimised through good design and measures to reduce pollution during all stages of the Scheme. The Substations have been located away from residential properties to reduce noise impacts and lighting has been minimised across the Scheme.</p> <p>The assessment contained in Chapter 10: Landscape and Visual Amenity, ES Volume 1 [EN010143/APP/6.1] includes the potential landscape and visual impacts associated with the construction, operation and decommissioning of the Scheme on local amenity and nature</p>

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conservation. This includes an assessment of light pollution effects.

However, it should be noted that the lighting proposed is minimal, particularly considering the scale of the Scheme, with the lighting designed to minimise impacts on local amenity and natural conservation.

During construction as far as is practicable, works will be limited to daylight hours only, with focussed task specific lighting provided where this is not practicable, for example at HDD locations where night time working is required. Within construction compounds and at welfare areas, etc, motion activated security lighting will be employed outside of core hours.

No visible lighting will be utilised at the Solar PV Site perimeter fence. Infrared (IR) lighting will be provided by the CCTV/security system to provide night vision functionality for CCTV. During operation, areas of solar PV will not require artificial lighting other than during temporary periods of maintenance/relair.

The lighting strategy is discussed in detail in **Chapter 2: The Scheme, ES Volume 1** and construction phase measures are further outlined in the Framework CEMP presented at **Appendix 2-1, ES Volume 2**.

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The construction noise assessments presented in **Section 11.7 of Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1]** include the assessment of noise resulting from road and rail traffic movements generated during construction. Traffic during the operational period will be negligible. It concludes that no significant noise or vibration effects are predicted during the operational phase.

Significant effects are anticipated during construction from HDD activities at the Grid Connection Corridor and the Interconnecting Cable Corridor. These effects would only occur during construction and would be mitigated through a communication strategy and noise complaint system will be secured through the DCO as part of the **Framework CEMP [EN010143/APP/7.7]** and Detailed CEMP (a requirement of the DCO).

Paragraph 5.10.23

Applicants should consider how landscapes can be enhanced using landscape management plans, as this will help to enhance environmental assets where they contribute to landscape and townscape quality

Good design has been a key consideration from the outset. The LVIA has informed the iterative design process, which is set out in the **Design and Access Statement [EN010143/APP/7.3]**. The Scheme layout and design has been developed in response to policy requirements, published landscape character assessment guidance and fieldwork analysis. The design mitigation has been embedded in the Scheme to

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Paragraph 5.10.24	<p>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 sensitive receptors. This may assist the Secretary of State in judging the weight they should give to the assessed visual impacts of the proposed development.</p>	<p>minimise effects on landscape character and visual amenity as shown in the Framework LEMP [EN010143/APP/7.14]. This will inform a detailed LEMP which will be secured by the DCO. The landscape design principles aim to achieve the following:</p> <ul style="list-style-type: none"> • Careful siting in the landscape • Conserving the existing vegetation patterns • Creating new green infrastructure • Sensitive Design in Relation to Form, Colour, and Materials • Sensitive Design of Lighting <p>Section 10.5 Baseline Conditions of Chapter 10: Landscape and Visual Amenity, ES Volume 1 [EN010143/APP/6.1] states that Drax Power Station, as well as other major energy and transport infrastructure are present to the west and have an influence on the landscape.</p>
Paragraph 5.10.26	<p>Within a defined site, adverse landscape and visual effects may be minimised through appropriate siting of infrastructure within that site, design including colours and materials, and landscaping schemes, depending on the size and type of the proposed project. Materials and</p>	<p>Good design has been a key consideration from the outset. The LVIA has informed the iterative design process, which is set out in the Design and Access Statement [EN010143/APP/7.3]. The Scheme layout and design has been developed in response to policy requirements,</p>

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	<p>designs of buildings should always be given careful consideration.</p>	<p>published landscape character assessment guidance and fieldwork analysis. The design mitigation has been embedded in the Scheme to minimise effects on landscape character and visual amenity as shown in the Framework LEMP [EN010143/APP/7.14]. This will inform a detailed LEMP which will be secured by the DCO. The landscape design principles aim to achieve the following:</p> <ol style="list-style-type: none"> a. Careful siting in the landscape b. Conserving the existing vegetation patterns c. Creating new green infrastructure d. Sensitive Design in Relation to Form, Colour, and Materials e. Sensitive Design of Lighting
<p>Paragraph 5.10.27</p>	<p>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</p>	<p>The Scheme will not undertake any landscaping off site.</p>
<p>Paragraph 5.10.29</p>	<p>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.</p>	<p>The Outline Design Principles Statement [EN010143/APP/7.4] and Framework LEMP [EN010143/APP/7.14] will inform detailed Design</p>

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Paragraph 5.10.33	The duty to have regard to the purposes of nationally designated areas also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. 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	The Chapter 10: LVIA, ES Volume 1 [EN010143/APP/6.1] sets out the Scheme’s impacts on nationally designated areas. There is not anticipated to be adverse impacts to NCA 39: Humberhead Levels as a result of the Scheme.
Paragraph 5.10.34	The scale of energy projects means that they will often be visible within many miles of the site of the proposed infrastructure. 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	This policy recognises that virtually all NSIPs will have effects on the landscape and this is also the case for the Scheme. However, there are few impacts when taking into account the scale of the Scheme and its benefits. Good design has been a key consideration from the outset. The LVIA has informed the iterative design process, which is set out in the Design and Access Statement [EN010143/APP/7.3] . The Scheme layout and design has been developed in response to policy requirements, published landscape character assessment guidance and fieldwork analysis. The design mitigation has been embedded in the Scheme to minimise effects on landscape character and visual amenity as shown in the Framework LEMP [EN010143/APP/7.14] . This will inform a detailed LEMP which will be secured by the DCO. The

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landscape design principles aim to achieve the following:

- Careful siting in the landscape
- Conserving the existing vegetation patterns
- Creating new green infrastructure
- Sensitive Design in Relation to Form, Colour, and Materials
- Sensitive Design of Lighting

Chapter 10: Landscape and Visual Amenity, ES Volume 1 [EN010143/APP/6.1] concludes that the likelihood of significant adverse landscape effects on NCA 39 is considered negligible..

Chapter 10: Landscape and Visual Amenity, ES Volume 1 [EN010143/APP/6.1] concludes that it is not considered that the Scheme would result in significant landscape effects to the local Landscape Character Areas during construction.

Overall, the Scheme is likely to result in a significant adverse effect on the Howden to Bubwith LCA 5A during Operation Year 1 and Year 15 and to the West of Holme on Spalding Moor Farmland LCA 5B during Operation Year 1, with effects reducing to not significant following decommissioning. None of the remaining

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Paragraph 5.10.35

In reaching a judgment, 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.

Construction and decommissioning stage impacts will be for a relatively short duration, and operational effects beginning at Year 1 will reduce over time as mitigation planting establishes. The change to the landscape character, via the introduction of solar panels and associated infrastructure is considered to be localised. The reduction of effects over time and the reversibility of effects should be taken into consideration when reaching a judgement on the Application.

It is considered that the limited and reversible landscape and visual effects of the Scheme are clearly and comprehensively outweighed by the benefits of the Scheme in terms of delivering

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		<p>renewable energy infrastructure which is urgently needed in order to create a secure and affordable energy system and to help combat climate change. Therefore, in accordance with this policy, the level of landscape impacts are not considered to be so damaging that they are not offset by the benefits of the Scheme</p>
<p>Paragraph 5.10.36</p>	<p>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</p>	<p>The Scheme has been carefully designed to take account of environmental effects on the landscape and siting, operational and other relevant constraints, to minimise harm to the landscape, including by appropriate mitigation. This is set out in Chapter 10: Landscape and Visual Amenity, ES Volume 1 [EN010143/APP/6.1] and the Framework LEMP [EN010143/APP/7.14].</p>
<p>Paragraph 5.10.37</p>	<p>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 impact.</p>	<p>The Outline Design Principles Statement [EN010143/APP/7.4] and Framework LEMP [EN010143/APP/7.14] will inform detailed Design Principles Statement and LEMP, which will secure the design of the Scheme through the DCO.</p>

Land Use, Including Open Space, Green Infrastructure and Green Belt

<p>Paragraph 5.11.4</p>	<p>Development of land will affect soil resources, including physical loss of and damage to soil resources, through land contamination and structural damage. Indirect impacts may also arise from changes in the local water regime, organic matter content, soil biodiversity and soil process.</p>	<p>Chapter 15: Soils and Agricultural Land, ES Volume 1 [EN010143/APP/6.1] provides as assessment of how the Scheme will affect soil resources, including physical loss of and damage to soil resources, and indirect impacts to local water features, organic matter, soil biodiversity and soil process.</p>
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Industry standard good practice measures for the handling and management of soil resources based upon guidance such as Defra's Code of Practice for the Sustainable Use of Soil on Development Sites are summarised in section 15.2 of **Chapter 15: Soils and Agricultural Land, ES Volume 1 [EN010143/APP/6.1]**, and further described in the **Framework CEMP [EN010143/APP/7.7]** and **Framework SMP [EN010143/APP/7.10]** submitted. The delivery of a detailed CEMP and SMP prior to the commencement of works on site and implementation of the measures they describe will be secured through the DCO.

The change in land use from arable to grassland over the operational lifetime of the Scheme is predicted to deliver improvements to soil structure and carbon content as set out in Section 15.9 Residual Effects of **Chapter 15: Soils and Agricultural Land, ES Volume 1 [EN010143/APP/6.1]**.

Paragraph 5.11.8

The ES (see Section 4.2) 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

Chapter 12: Socio-Economics and Land use, ES Volume 1 [EN010143/APP/6.1] identifies the existing baseline land use and socio-economic conditions for the Order limits, including the existing arable agricultural use of the majority of the site, and takes account of these in its assessment. It estimates that during construction,

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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.

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the Scheme will support, on average, 401 total net jobs per annum. Of these, 181 jobs per annum will be expected to be taken up by residents within the local area. It states that although these jobs are temporary, they represent a positive economic effect for a substantial period that can be estimated as the function of the scale and type of activities required to construct the Scheme.

Appendix A and Section 2.7 of the **Planning Statement [EN010143/APP/7.2]** set out the planning history identified for the Order limits and surrounding area. There are no consents, pending applications or allocations within the Solar PV Site.

Within the Grid Connection Corridor, there are 6 projects which overlap with the Scheme. These are Helios Renewable Energy Project, Scotland to England Green Link (SEGL) 2, Drax Bioenergy with Carbon Capture and Storage Project, Humber Low Carbon Pipeline, Drax Re-Power and Lakeside Energy Storage. The projects are all at different stages, some being determined, and others currently being prepared or at examination. The Scheme would not preclude any of these developments from being developed, and these projects can be constructed alongside the Scheme, which has been considered within the Cumulative assessment in **Chapter 17:**

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**Cumulative Effects, ES Volume 1
[EN010143/APP/6.1].**

Small parts of the Scheme are located within East Riding of Yorkshire's Minerals Safeguarding Area (MSA) EC6 and an (unnamed) area of safeguarded surface mineral resource in North Yorkshire as shown in **Appendix D** of the **Planning Statement [EN010143/APP/7.2]**. **Chapter 12: Socio economics and land use, ES Volume 1 [EN010143/APP/6.1]** and **Appendix 12-2 Communications with Minerals Planning Authorities, ES Volume 2 [EN010143/APP/6.2]** explain that the impact of the Scheme on minerals was scoped out of the environmental impact assessment in agreement with the North Yorkshire Council Mineral Planning Authority.

The Scheme would not impact mineral resources and safeguards mineral resources within the Order limits by not preventing the extraction of mineral in the future after any decommissioning has taken place.

Paragraph 5.11.12

Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5).

Agricultural land quality was a key consideration of the site selection process as set out in **Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1]**. The Scheme is located mostly on lower quality agricultural land, with the majority of the Scheme being on land not classed

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as Best and Most Versatile (BMV). For the Solar PV Site, 92% of the land used is non BMV land.

The Applicant has taken a sequential approach to agricultural land considering whether land of lower grade is available and suitable. There were no other alternative sites within the Initial Area of Search which would be of lower grade agricultural land (compared to the majority of the Order limits) that were available or considered suitable for the Scheme and its objectives.

With regard to the Grid Connection Corridor, the land immediately surrounding Drax Substation is classed as BMV of grades 1-2. Therefore, there are no reasonable alternatives which use land of lower classification available for the Grid Connection Corridor.

Following Statutory Consultation, the Site Area was reduced with the removal of land to the south of solar PV areas 3c and 2g to the south of the SEGL2 development which subsequently reduced further the proportion of BMV land within the scheme.

The vast majority of agricultural land within the Order limits would be available for return to agriculture following decommissioning of the Scheme. **Chapter 15: Soils and Agricultural Land, ES Volume 1 [EN010143/APP/6.1]**

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concludes that a very small amount (0.41 ha) of BMV Subgrade 3a land for tree planting would be permanently removed from agricultural use which would result in an ecological benefit.

In addition, the conversion of arable to grassland during the 40 year operational period has potential to accrue improvement to soil function over a large area during operation which has a slight beneficial effect.

The cumulative impacts of the Scheme with other existing and proposed energy sector developments is set out in **chapters 6 – 16, ES Volume 1 [EN010143/APP/6.1]** and is summarised in **Chapter 17: Cumulative Effects and Interactions, ES Volume 1 [EN010143/APP/6.1]**.

There will not be any new likely significant effects associated with cumulative effects that are not already accounted for by the assessment of the Scheme. An exception is the functional improvement of soil resources that would follow conversion of arable to grassland when considered with the other solar farm proposals in North Yorkshire, which is considered to be moderately beneficial, which is significant.

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		<p>It is also considered that the land beneath the solar PV arrays could be used for sheep grazing while the Scheme is in operation.</p> <p>A Framework Soils and Management Plan [EN010143/APP/7.10] sets out the principles on how soils will be managed and protected during the construction, operation and decommissioning of the Scheme. A detailed soil resource management plan will be prepared prior to construction as secured by DCO Requirement.</p>
Paragraph 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.	<p>Chapter 15: Soils and Agricultural Land, ES Volume 1 [EN010143/APP/6.1] sets out the embedded mitigation measures incorporated into the Scheme which minimise impacts on soil health and protect and improve soil quality.</p>
Paragraph 5.11.14	Applicants are encouraged to develop and implement a Soil Management Plan which could help minimise potential land contamination. The sustainable reuse of soils needs to be carefully considered in line with good practice guidance where large quantities of soils are surplus to requirements or are affected by contamination	<p>With regard to minimising the impact on soils further, the Framework Soils and Management Plan [EN010143/APP/7.10] sets out the principles on how the soils will be managed and protected during the construction, operation and decommissioning of the Scheme. A detailed soil resource management plan will be prepared prior to construction as secured by DCO Requirement.</p> <p>Chapter 15: Soils and Agricultural Land, ES Volume 1 [EN010143/APP/6.1] concludes that there is a slight beneficial effect associated with</p>

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Paragraph 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	<p>the conversion of arable to grassland during the operational stage, which has potential to accrue improvement to soil function over a major area during operation.</p> <hr/> <p>Chapter 16: Other Environmental Topics, ES Volume 1 [EN010143/APP/6.1] assesses the impact on ground conditions. There is not expected to be any likely significant effects associated with Ground Conditions. During construction, mitigation to prevent surface runoff, discharge into watercourses and dust generation will form part of the construction phase obligations and requirements.</p>
Paragraph 5.11.19	Applicants should safeguard any mineral resources on the proposed site as far as possible, taking into account the long-term potential of the land use after any future decommissioning has taken place	<p>Small parts of the Scheme are located within East Riding of Yorkshire's Minerals Safeguarding Area (MSA) EC6 and an (unnamed) area of safeguarded surface mineral resource in North Yorkshire as shown in Appendix D of the Planning Statement [EN010143/APP/7.2]. Chapter 12: Socio economics and land use, ES Volume 1 [EN010143/APP/6.1] and Appendix 12-2 Communications with Minerals Planning Authorities, ES Volume 2 [EN010143/APP/6.2] explain that the impact of the Scheme on minerals was scoped out of the environmental impact assessment in agreement with the North Yorkshire Council Mineral Planning Authority.</p>

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Paragraph 5.11.23

Although in the case of most energy infrastructure there may be little that can be done to mitigate the direct effects of an energy project on the existing use of the proposed site (assuming that some of that use can still be retained post project construction) applicants should nevertheless seek to minimise these effects and the effects on existing or planned uses near the site by the application of good design principles, including the layout of the project and the protection of soils during construction.

The Scheme would not impact mineral resources and safeguards mineral resources within the Order limits by not preventing the extraction of mineral in the future after any decommissioning has taken place.

Agricultural land quality was a key consideration of the site selection process as set out in **Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1]**. The Scheme is located mostly on lower quality agricultural land, with the majority of the Scheme being on land not classed as Best and Most Versatile (BMV). For the Solar PV Site, 92% of the land used is non BMV land.

The vast majority of agricultural land within the Order limits would be available for return to its existing agricultural use following decommissioning of the Scheme.. **Chapter 15: Soils and Agricultural Land, ES Volume 1 [EN010143/APP/6.1]** concludes that a very small amount (0.41 ha) of BMV Subgrade 3a land for tree planting would be permanently removed from agricultural use which would result in an ecological benefit. 8.97 ha of Subgrade 3b would be permanently removed from agricultural use as a result tree and hedge planting and 2 ha as a result of the potential retention of the Grid Connection Substations and associated accesses.

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In addition, the conversion of arable to grassland during the 40 year operational period has the potential to accrue improvement to soil function over a large area during operation which has a slight beneficial effect.

The cumulative impacts of the Scheme with other existing and proposed energy sector developments is set out in **chapters 6 – 16, ES Volume 1 [EN010143/APP/6.1]** and is summarised in **Chapter 17: Cumulative Effects and Interactions, ES Volume 1 [EN010143/APP/6.1]**.

There will not be any new likely significant effects associated with cumulative effects that are not already accounted for by the assessment of the Scheme. An exception is the functional improvement of soil resources that would follow conversion of arable to grassland when considered with the other solar farm proposals in North Yorkshire, which is considered to be moderately beneficial, which is significant.

It is also considered that the land beneath the solar PV arrays could be used for sheep grazing.

Paragraph 5.11.27

Existing trees and woodlands should be retained wherever possible. The applicant should assess the impacts on, and loss of, all trees and woodlands within

Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] concludes that there would

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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 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.

be no loss of ancient woodland, or veteran or ancient trees as a result of the Scheme.

As detailed in **Appendix 10-5: Arboricultural Impact Assessment and Tree Protection Report, ES Volume 2 [EN010143/APP/6.2]**, two veteran trees and one ancient tree are subject to an incursion into their Root Protection Area (RPA) or canopy spread. In all cases, RPA incursions will be managed so that there will be no detrimental impacts on the health or amenity of retained trees.

Chapter 8: Ecology, ES Volume 1 [EN101043/APP/6.1] also states that one ancient tree (T45) may require pruning to facilitate a temporary clearance for vehicular access. The final extent of pruning is to be agreed on site with an arboriculturist, but is not considered likely to result in a detrimental impact to the tree due to its species (crack willow) which is tolerant of pruning), good vitality and due to the existing clearance maintained over the existing hard surfaced access route.

As outlined in **Chapter 8: Ecology, ES Volume 1 [EN101043/APP/6.1]** the Scheme has been designed with the view to avoid key nature conservation and ecological features present within or adjacent to the Site as far as practicable. Accordingly, the following minimum buffers from

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Paragraph 5.11.28

Where a proposed development has an impact upon a Mineral Safeguarding Area (MSA), the Secretary of State should ensure that appropriate mitigation measures have been put in place to safeguard mineral resources.

key habitat features have been applied where practicable (e.g., some features such as hedgerows and waterbodies will be crossed):

- a. 15m from woodlands (some cabling will lie within 15m of woodland);
- b. 10m from hedgerows increasing to 15m where there are hedgerow trees;
- c. 15m from individual trees;

Small parts of the Scheme are located within East Riding of Yorkshire's Minerals Safeguarding Area (MSA) EC6 and parts of the Grid Connection Corridor lie within an (unnamed) area of safeguarded surface mineral resource in North Yorkshire as shown in **Appendix D** of the **Planning Statement [EN010143/APP/7.2]**.

Chapter 12:Socio economics and land use, ES Volume 1 [EN010143/APP/6.1] and Appendix 12-2 Communications with Minerals Planning Authorities, ES Volume 2 [EN010143/APP/6.2] explain that the impact of the Scheme on minerals was scoped out of the environmental impact assessment in agreement with the North Yorkshire Council Mineral Planning Authority.

The Scheme would not impact mineral resources and safeguards mineral resources within the

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Paragraph 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

Order limits by not preventing the extraction of mineral in the future after any decommissioning has taken place.

The Scheme has been designed to have minimal impact on PRow. As set out in the **Design and Access Statement [EN010143/APP/7.3]** the Scheme design maintains access to all existing PRow within the Order limits, with no permanent diversions or closures;

It also ensures a minimum width for PRow, as well as for the corridor in which they will be provided (between Scheme infrastructure). In all cases the PRow will see perimeter fencing being installed a minimum distance from the centreline of the PRow of 20 m to either side (creating a 40 m corridor) if the solar infrastructure is on both sides of the PRow, and of 15 m if solar infrastructure lies to one side only. This will help avoid the perception of being channelled into narrow passages between solar PV panels;

The design proposes perimeters to be planted with species-rich grassland or flower rich grassland (Solar PV area 2f) and clumps of low-growing native woodland edge to break up channelled views created by the proposed Solar PV fencing, and would provide amenity for walkers, cyclists and horse-riders. It would also

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create new native hedgerows with trees along the Howden 20 Route and PRow BUBWF10.

In addition, two new Permissive Paths are proposed, which are routes available to the public during the operational life of the Scheme, as follows:

- a. A continuation of Bridleway SPALB08 which currently terminates at Johnson's Farm. This will be a Permissive Path over which horse riders will be permitted to travel, running northbound for approximately 340 m until connecting with the second permissive route; and
- b. An eastbound route from footpath SPALF14 (north of Spaldington) parallel with Londesborough Drain to connect with the first Permissive Path, continuing eastwards to the edge of the habitat enhancement in solar PV Area 1e running for approximately 1.4 km. This Permissive Path will allow horse riding over the majority of the extent of the route. The section travelling westbound from where the two permissive routes meet will permit passage by foot only, being of approximately 250 m in length.

A Framework Public Right of Way Management Plan [EN010143/APP/7.14] has been submitted alongside the application. It is anticipated that a

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Paragraph 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.

detailed Public Right of Way Management Plan will be required post consent and will be secured by the DCO.

Agricultural land quality was a key consideration of the site selection process as set out in **Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1]**. The Scheme is located mostly on lower quality agricultural land, with the majority of the Scheme being on land not classed as Best and Most Versatile (BMV). For the Solar PV Site, 92% of the land used is non BMV land.

The Applicant has taken a sequential approach to agricultural land considering whether land of lower grade is available and suitable. There were no other alternative sites within the Initial Area of Search which would be of lower grade agricultural land (compared to the majority of the Order limits) that were available or considered suitable for the Scheme and its objectives.

With regard to the Grid Connection Corridor, the land immediately surrounding Drax Substation is classed as BMV of grades 1-2. Therefore, there are no reasonable alternatives which use land of lower classification available for the Grid Connection Corridor.

Following Statutory Consultation, the Site Area was reduced with the removal of land to the south of solar PV areas 3c and 2g to the south of the

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SEGL2 development which subsequently reduced further the proportion of BMV land within the scheme.

The vast majority of agricultural land within the Order limits would be available for return to its existing agricultural use following decommissioning of the Scheme.. **Chapter 15: Soils and Agricultural Land, ES Volume 1 [EN010143/APP/6.1]** concludes that a very small amount (0.41 ha) of BMV Subgrade 3a land for tree planting would be permanently removed from agricultural use which would result in an ecological benefit. 8.97 ha of Subgrade 3b would be permanently removed from agricultural use as a result tree and hedge planting and 2 ha as a result of the potential retention of the Grid Connection Substations and associated accesses.

In addition, the conversion of arable to grassland during the 40 year operational period has the potential to accrue improvement to soil function over a large area during operation which has a slight beneficial effect.

The cumulative impacts of the Scheme with other existing and proposed energy sector developments is set out in **chapters 6 – 16, ES Volume 1 [EN010143/APP/6.1]** and is summarised in **Chapter 17: Cumulative Effects**

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and Interactions, ES Volume 1
[EN010143/APP/6.1].**

There will not be any new likely significant effects associated with cumulative effects that are not already accounted for by the assessment of the Scheme. An exception is the functional improvement of soil resources that would follow conversion of arable to grassland when considered with the other solar farm proposals in North Yorkshire, which is considered to be moderately beneficial, which is significant.

It is also considered that the land beneath the solar PV arrays could be used for sheep grazing while the Scheme is in operation.

A Framework Soils and Management Plan [EN010143/APP/7.10] sets out the principles on how soils will be managed and protected during the construction, operation and decommissioning of the Scheme. A detailed soil resource management plan will be prepared prior to construction as secured by DCO Requirement.

Noise and Vibration

Paragraph 5.12.4

Noise resulting from a proposed development can also have adverse impacts on wildlife and biodiversity. Noise effects of the proposed development on ecological

Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] includes an assessment of the likely impacts and effects of noise on relevant

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	<p>receptors should be assessed by the Secretary of State in accordance with the Biodiversity and Geological Conservation section of this NPS at Section 5.4. This should consider underwater noise and vibration especially for marine developments. Underwater noise can be a significant issue in the marine environment, particularly in regard to energy production.</p>	<p>ecological features. It is therefore considered that the Scheme is compliant with this policy</p>
<p>Paragraph 5.12.6</p>	<p>Where noise impacts are likely to arise from the proposed development, the applicant should include the following in the noise assessment:</p> <ul style="list-style-type: none"> • a description of the noise generating aspects of the development proposal leading to noise impacts, including the identification of any distinctive tonal, impulsive, low frequency or 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 o in the shorter term, such as during the construction period o in the longer term, during the operating life of the infrastructure o 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 well-being where appropriate, and noise-sensitive areas • if likely to cause disturbance, an assessment of the effect of underwater or subterranean noise 	<p>Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1] presents a noise assessment in accordance with the requirements of this policy, including a description of the noise generating aspects of the development.</p> <p>Section 11.4 of Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1] describes the noise sensitive premises and areas that have been identified. Noise-sensitive sensitive receptors have been identified through a desktop study of aerial imagery and mapping and are presented in Figure 11-1, ES Volume 2, and are summarised in Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1]. The locations of these receptors have been considered in both the construction and operational noise assessments.</p> <p>Section 11.5 of Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1] outlines the characteristics of the existing noise</p>

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	<ul style="list-style-type: none">• measures to be employed in mitigating the effects of noise using best available techniques to reduce noise impacts	<p>environment for the Scheme and surrounding areas.</p> <p>Section 11.6 of Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1] describes the embedded design mitigation for the Scheme with respect to noise and vibration, encompassing the construction, operation and decommissioning phases.</p> <p>Section 11.7 of Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1] assesses the noise generated by the Scheme during the construction period and operating life of the infrastructure (including features), including at particular times of the day and at night, on the noise sensitive premises and areas outlined in Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1].</p> <p>The noise assessment is proportionate to the likely noise impact, which would be managed through the Framework CEMP, Appendix 2-1, ES Volume 2 [EN010143/APP/6.2] during construction and would be limited by the nature of the Scheme and very small amount of traffic generated during operation.</p>
Paragraph 5.12.7	The nature and extent of the noise assessment should be proportionate to the likely noise impact.	The noise assessment is proportionate to the likely noise impact, which would be managed through the Framework CEMP, Appendix 2-1, ES Volume 2 [EN010143/APP/6.2] during

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Paragraph 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.	construction and would be limited by the nature of the Scheme and very small amount of traffic generated during operation. The construction noise assessments presented in Section 11.7 of Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1] include the assessment of noise resulting from road and rail traffic movements generated during construction. Traffic during the operational period will be negligible. It concludes that no significant noise or vibration effects are predicted during the operational phase. Significant effects are anticipated during construction from HDD activities at the Grid Connection Corridor and the Interconnecting Cable Corridor. These effects would only occur during construction and would be mitigated through a communication strategy and noise complaint system will be secured through the DCO as part of the Framework CEMP [EN010143/APP/7.7] and detailed CEMP.
Paragraph 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	Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1] assessed operational plant noise at sensitive receptors (including human receptors) following BS 4142 guidance, BS8233:2014 and World Health Organization guidance. Assessment of construction and

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	<p>of those technologies. For the prediction, assessment and management of construction noise, reference should be made to any relevant British Standards²⁶⁰ and other guidance which also give examples of mitigation strategies.</p>	<p>decommissioning noise has been assessed in line with Annex E of British Standards 5228-1.</p>
<p>Paragraph 5.12.12</p>	<p>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</p>	<p>Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1] provides a detail impact assessment and mitigation plan for noise and vibration impacts.</p>
<p>Paragraph 5.12.13</p>	<p>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 planning practice guidance on noise.</p>	<p>Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1], concludes that no significant noise or vibration effects are predicted during the construction and decommissioning phases or the operational phase with the exception of night-time HDD activities in the construction phase. However, identification of likely significant effects is precautionary based on the worst-case assumption that 24-hour HDD working would be required.</p>
<p>Paragraph 5.12.14</p>	<p>Mitigation measures may include one or more of the following:</p> <ol style="list-style-type: none"> a. engineering: reducing the noise generated at source and/or containing the noise generated b. 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 	<p>Section 11.6 of Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1] details the embedded mitigation measures for the operational phase have been considered. Embedded mitigation measures that will be applied includes consideration of:</p> <ol style="list-style-type: none"> a. Plant selection;

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	<p>by natural or purpose-built barriers, or other buildings</p> <p>c. 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</p> <p>insulation: mitigating the impact on areas likely to be affected by noise including through noise insulation when the impact is on a building.</p>	<p>b. Design Location and orientation of Field Station Units / Field Substations, and the Grid Connection Substations to minimise noise at receptors.</p> <p>c. Best Practicable Means that would be implemented during construction works and secured through the CEMP and DEMP</p> <p>d. Where practicable, avoid HDD works within 200 m (the distance at which significant effects are predicted at night) of residential receptors (although this will depend on the results of the ground investigation survey);</p> <p>e. Where HDD activities may occur within 200 m of sensitive receptors, the option for open cut cable laying will be explored as an alternative to HDD;</p>
Paragraph 5.12.15	<p>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)</p>	<p>The Scheme has demonstrated good design through the inclusion of noise and vibration mitigation measures. Section 11.6 of Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1] details the embedded mitigation measures for the operational phase have been considered. Embedded mitigation measures that will be applied includes consideration of:</p> <p>a. Plant selection;</p>

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- b. Design Location and orientation of Field Station Units / Field Substations, and the Grid Connection Substations to minimise noise at receptors.
- c. Best Practicable Means that would be implemented during construction works and secured through the CEMP and DEMP
- d. Where practicable, avoid HDD works within 200 m (the distance at which significant effects are predicted at night) of residential receptors (although this will depend on the results of the ground investigation survey);
- e. Where HDD activities may occur within 200 m of sensitive receptors, the option for open cut cable laying will be explored as an alternative to HDD;

Chapter 10: LVIA, ES Volume 1

[EN010143/APP/6.1] sets out an assessment of how the Scheme's design, which includes embedded mitigation measures, will have an effect on landscape and visual impacts, and sets out any necessary mitigation measures.

Paragraph 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.

Chapter 11: Noise and Vibration, ES Volume 1

[EN101043/APP/6.1] considers the relevant sections of the Noise Policy Statement for England, the NPPF, and the government's associated planning guidance on noise.

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Paragraph 5.12.17	<p>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:</p> <ul style="list-style-type: none"> • avoid significant adverse impacts on health and quality of life from noise • mitigate and minimise other adverse impacts on health and quality of life from noise • where possible, contribute to improvements to health and quality of life through the effective management and control of noise 	<p>Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1], concludes that no significant noise or vibration effects are predicted during the construction and decommissioning phases or the operational phase with the exception of night-time HDD activities in the construction phase.</p> <p>The potential for sleep disturbance constitutes a likely significant effect at three receptors (R43, R45 and R46). In the event that HDD activities are required at night, additional mitigation measures for HDD activities would be identified once a Principal Contractor has been appointed, to lower the level of impact, but as these have not yet been defined, to present a worst case, the residual effect is considered to remain significant. This would only apply in the unlikely event that HDD occurs near these receptors during night-time.</p>
Paragraph 5.12.18	<p>When preparing the development consent order, the Secretary of State should consider including measurable requirements or specifying the mitigation measures to be put in place to ensure that noise levels do not exceed any limits specified in the development consent. These requirements or mitigation measures may apply to the construction, operation, and decommissioning of the energy infrastructure development.</p>	<p>The effect of noise and vibration on nearby sensitive receptors can be minimised through a good communication strategy. Prior to construction works being undertaken, liaison will be undertaken with occupiers of sensitive receptors that may be adversely affected by construction noise and vibration. The communication strategy and noise complaint system will be secured through the DCO as part of</p>

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		<p>the Framework CEMP [EN010143/APP/7.7] and Framework DEMP [EN010143/APP/7.9].</p> <p>In addition, the Applicant will submit an application for prior consent to carry out noisy work under Section 61 of the Control of Pollution Act (Error! Reference source not found.) to demonstrate that noise and vibration has been minimised as far as reasonably practicable</p>
Socio-economics Impacts		
Paragraph 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	Chapter 12: Socio-economics and Land Use, ES Volume 1 [EN010143/APP/6.1] undertakes an assessment of these impacts in Section 12.7 .
Paragraph 5.13.3	The applicant is strongly encouraged to engage with relevant local authorities during early stages of project development so that the applicant can gain a better understanding of local or regional issues and opportunities.	The Applicant has engages with the relevant local authorities, as set out Chapter 12: Socio-economics and Land Use, ES Volume 1 [EN010143/APP/6.1] .
Paragraph 5.13.4	The applicant’s assessment should consider all relevant socio-economic impacts, which may include: <ul style="list-style-type: none"> • 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	Chapter 12: Socio-Economics and Land Use, ES Volume 1 [EN010143/APP/6.1] includes an assessment of socio-economic impacts that fulfils the requirements of this policy.

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- 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 on tourism
- 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 to for a number of projects within a region and these were developed in a similar timeframe, there could be some short-term negative effects, for example a potential shortage of construction workers to meet the needs of other industries and major projects within the region

Paragraph 5.13.5

Applicants should describe the existing socio-economic conditions in the areas surrounding the proposed development and should also refer to how the

The current socio-economic baseline conditions of the study area has been described in **Chapter 12: Socio-Economics and Land Use, ES Volume 1**

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	development's socio-economic impacts correlate with local planning policies	[EN010143/APP/6.1] . The Scheme's compliance with local planning policies is considered in Appendix C of the Planning Statement [EN010143/APP/7.2] .
Paragraph 5.13.6	Socio-economic impacts may be linked to other impacts, for example visual impacts considered in Section 5.10 but may also have an impact on tourism and local businesses. Applicants are encouraged, where possible, to demonstrate that local suppliers have been considered in any supply chain.	<p>Chapter 12: Socio-Economics and Land Use, ES Volume 1 [EN010143/APP/6.1] considers the socio-economic impact of the Scheme. Chapter 10: Landscape and Visual, ES Volume 1 [EN010143/APP/6.1] considers the effects on various receptors, including local tourism facilities such as PRoW. No significant adverse visual or socio-economic effects are predicted by year 15 of operation.</p> <p>Chapter 12: Socio-Economics and Land Use, ES Volume 1 [EN010143/APP/6.1] identifies that the Scheme will result in beneficial effects (that are not significant) on the local economy as a result of employment generation during the construction and decommissioning periods.</p> <p>During the construction phase, a Framework Skills, Supply Chain and Employment Plan EN010143/APP/7.15] will be implemented. The purpose of this is to promote employment and training opportunities associated with the construction and operation of the Scheme. The implementation of this Plan will help to maximise the positive gain for the local economy from the</p>

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		beneficial effect arising from employment generation.
Paragraph 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	No accommodation strategy is proposed for the Scheme.
Paragraph 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	<p>Chapter 12: Socio-economics and Land Use, ES Volume 1 [EN010143/APP/6.1] states that mitigation measures are embedded within the Scheme to reduce other construction and operational effects (relating to noise, air quality, transport and landscape), which in turn will mitigate the effects on the local community and existing facilities from a Socio-Economic and Land Use perspective. The relevant mitigation measures are set out in the respective chapters.</p> <p>The Scheme has been designed to the principles of good design, as set out in Chapter 10: LVIA, ES Volume 1 [EN010143/APP/6.1] and the Design and Access Statement [EN010143/APP/7.3].</p>
Paragraph 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.	Chapter 12: Socio-economics and Land Use, ES Volume 1 [EN010143/APP/6.1] provides an assessment of the potential socio-economic impacts of the Scheme.

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Paragraph 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	<p>Chapter 12: Socio-economics and Land Use, ES Volume 1 [EN010143/APP/6.1] provides an assessment of the potential socio-economic impacts of the Scheme</p> <p>Where practicable, socio-economic impacts have been appraised against relevant national standards, such as those issued by Department for Energy Security and Net Zero including Draft NPS EN-1, Draft NPS EN-3 and Draft NPS EN-5 and HCA (now renamed Homes England), such as the HCA Additionality Guide. Where relevant standards do not exist, professional experience and expert judgement have been used to assess the scale and nature of the effects of the Scheme against baseline conditions.</p>
Paragraph 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.	<p>Chapter 12: Socio-Economics and Land Use, ES Volume 1 [EN010143/APP/6.1] identifies that the Scheme will result in beneficial effects (that are not significant) on the local economy as a result of employment generation during the construction and decommissioning periods.</p>
Paragraph 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.	<p>The benefits of the Scheme, including socio-economic benefits, are also set out in Section 5 of this Planning Statement [EN010143/APP/7.2].</p> <p>During the construction phase, a Framework Skills, Supply Chain and Employment Plan EN010143/APP/7.15] will be implemented. The</p>

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Traffic and Transport		
Paragraph 5.14.5	If a project is likely to have significant transport implications, the applicant's ES (see Section 4.2) should include a transport appraisal. The DfT's Transport Analysis Guidance (TAG)263 and Welsh Governments WeITAG264 provides guidance on modelling and assessing the impacts of transport schemes	Appendix 13-4, ES Volume 2 [EN010143/APP/6.1] contains a transport Assessment, prepared in accordance with the appropriate guidance which includes the Travel Plans, TAs and Transport Statements in Decision Taking (2014). The Applicant has consulted with the relevant Highways Authorities and National Highways regarding the assessment and mitigation. Comments from these stakeholders are presented in Section 13.3 of Chapter 13: Transport and Access, ES Volume 1 [EN010143/APP/6.1] .
Paragraph 5.14.6	Applicants should consult National Highways and Highways Authorities as appropriate on the assessment and mitigation.	A TA (Appendix 13-4, ES Volume 2 [EN010143/APP/6.2]) has been submitted following consultation with the local Highway Authorities including Highways England. The latest guidance on TAs has been applied.
Paragraph 5.14.7	The applicant should prepare a travel plan including demand management and monitoring measures to mitigate transport impacts. The applicant should also	A Framework CTMP, ES Volume 2 [EN010143/APP/6.2] outlines measures that will be included in the final CTMP to mitigate transport

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	provide details of proposed measures to improve access by active, public and shared transport to: <ul style="list-style-type: none"> • reduce the need for parking associated with the proposal; • contribute to decarbonisation of the transport network; • reduce the need to travel; and • secure behavioural change and modal shift through an offer of genuine modal choice and to mitigate transport impacts. 	impact, manage demand, and improve and encourage construction staff to access the Order limits by public transport, cycling and reduce car transport to, and parking at, the Order Limits. Chapter 13: Transport and Access, ES Volume 1 [EN010143/APP/6.1] considers possible disruptions to services and infrastructure.
Paragraph 5.14.8	The assessment should also consider any possible disruption to services and infrastructure (such as road, rail and airports).	
Paragraph 5.14.9	If additional transport infrastructure is needed or proposed, it should always include good quality walking, wheeling and cycle routes, and associated facilities (changing/storage etc) needed to enhance active transport provision	No additional transport infrastructure will be required for the Scheme. However, the Scheme proposes two new Permissive Paths which are routes available to the public during the operational life of the Scheme, as follows: <ol style="list-style-type: none"> a. A continuation of Bridleway SPALB08 which currently terminates at Johnson’s Farm. This will be a Permissive Path over which horse riders will be permitted to travel, running northbound for approximately 340 m until connecting with the second permissive route; and b. An eastbound route from footpath SPALF14 (north of Spaldington) parallel with Londesborough Drain to connect with the first Permissive Path, continuing eastwards to the edge of the habitat enhancement in Solar PV

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		<p>Area 1e running for approximately 1.4 km. This Permissive Path will allow horse riding over the majority of the extent of the route. The section travelling westbound from where the two permissive routes meet will permit passage by foot only, being of approximately 250 m in length.</p>
<p>Paragraph 5.14.11</p>	<p>Where mitigation is needed, possible demand management measures must be considered. This could include identifying opportunities to:</p> <ul style="list-style-type: none"> • reduce the need to travel by consolidating trips, • locate development in areas already accessible by active travel and public transport, • provide opportunities for shared mobility, • re-mode by shifting travel to a sustainable mode that is more beneficial to the network, • retime travel outside of the known peak times, • reroute to use parts of the network that are less busy 	<p>A Framework CTMP, ES Volume 2 [EN010143/APP/6.2] is included. It outlines measures that will be included in the final CTMP to mitigate transport impact, manage demand, and improve and encourage construction staff to access the Order limits by public transport, cycling and reduce car transport to, and parking at, the Order Limits.</p>
<p>Paragraph 5.14.12</p>	<p>All stages of the project should support and encourage a modal shift of freight from road to more environmentally sustainable alternatives, such as rail, cargo bike, maritime and inland waterways, as well as making appropriate provision for and infrastructure needed to support the use of alternative fuels including charging for electric vehicles</p>	<p>As set out in Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1] and the Framework CTMP [EN010143/APP/6.2] the Scheme would encourage all construction staff to use lower carbon modes of transport by identifying and communicating local bus and rail connections and pedestrian and cycle access routes to/from the Scheme and providing appropriate facilities for the safe storage of cycles;</p>

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Paragraph 5.14.13	Regard should always be given to the needs of freight at all stages in the construction and operation of the development including the need to provide appropriate facilities for HGV drivers as appropriate	<p>It would also ensure that construction vehicles conform to European Union (EU) vehicle emissions standards for the types of plant and vehicles to be used.</p> <p>Maritime and inland waterways are considered possible modes of transport for the Scheme.</p> <p>Given the context of the Order limits and the requirements for construction deliveries, and the fact that the railway line running adjacent to the Order limits is for passenger travel and would not facilitate construction deliveries, rail and water borne transports are not considered to be appropriate methods of transport to and from the Scheme.</p>
Paragraph 5.14.14	<p>The Secretary of State may attach requirements to a consent where there is likely to be substantial HGV traffic that:</p> <ul style="list-style-type: none"> • 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 • ensure satisfactory arrangements for reasonably foreseeable abnormal disruption, in consultation with network providers and the responsible police force 	<p>Section 13.6 of Chapter 13: Transport and Access, ES Volume 1 [EN010143/APP/6.1] outlines the embedded design mitigation measures, and effects of the Scheme in relation to traffic and transport, including HGV deliveries and staff vehicles.</p> <p>During construction, it has been identified that with embedded mitigation measures in place there could be potentially significant adverse effects at Link 15 in terms of construction traffic increase during the hours of 06:00-07:00 and 19:00-20:00. Over the course of a 24-hour period, during construction (and decommissioning), it is anticipated that Link 15 will see a 6% increase in</p>

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total traffic and a 0% increase in HGV traffic. This indicates that the overall impact on the road network will be low at this link location during the hours of 07:00-19:00.

These effects will be temporary, and only occur during the construction of the Scheme. **Chapter 13: Transport and Access, ES Volume 1 [EN010143/APP/6.1]** states that there will be no significant effects as a result of the Scheme on transport and access during operation, and there will not be significant HGV traffic to the Scheme.

A CTMP will be prepared prior to the commencement of development, to be substantially in accordance with the **Framework CTMP** submitted with the Application in **Appendix 13-5, ES Volume 2 [EN010143/APP/6.2]**.

The design of accesses at the site has taken into account the number and type of vehicles that will use them to avoid queuing on surrounding roads during construction. Parking will also be provided on site. The Applicant has also considered the routing of Abnormal Indivisible Load vehicles to the site to ensure safe, low impact routes are identified.

Paragraph 5.14.15

The Secretary of State should have regard to the cost-effectiveness of demand management measures compared to new transport infrastructure, as well as the

The **TA (Appendix 13-4, ES Volume 2 [EN010143/APP/6.2])** and **Framework CTMP (Appendix 13-5, ES Volume 2 [EN010143/APP/6.2])** submitted outline the

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	aim to secure more sustainable patterns of transport development when considering mitigation measures.	measures proposed to mitigate the transport impacts. This will be developed into a CTMP which will be secured by the DCO. .
Paragraph 5.14.18	A new energy NSIP may give rise to substantial impacts on the surrounding transport infrastructure and the Secretary of State should therefore ensure that the applicant has sought to mitigate these impacts, including during the construction phase of the development and by enhancing active, public and shared transport provision and accessibility.	Section 13.6 of Chapter 13: Transport and Access, ES Volume 1 [EN010143/APP/6.1] outlines the embedded design mitigation measures, and effects of the Scheme in relation to traffic and transport, including HGV deliveries and staff vehicles.
Paragraph 5.14.20	Development consent should not be withheld provided that the applicant is willing to enter into planning obligations for funding new infrastructure or requirements can be imposed to mitigate transport impacts. In this situation the Secretary of State should apply appropriately limited weight to residual effects on the surrounding transport infrastructure	During construction, it has been identified that with embedded mitigation measures in place there could be potentially significant adverse effects at Link 15 in terms of construction traffic increase during the hours of 06:00-07:00 and 19:00-20:00. Over the course of a 24-hour period, during construction (and decommissioning), it is anticipated that Link 15 will see a 6% increase in total traffic and a 0% increase in HGV traffic. This indicates that the overall impact on the road network will be low at this link location during the hours of 07:00-19:00.
Paragraph 5.14.21	The Secretary of State should only consider refusing development on highways grounds if there would be an unacceptable impact on highway safety, residual cumulative impacts on the road network would be severe, or it does not show how consideration has been given to the provision of adequate active public or shared transport access and provision.	These effects will be temporary, and only occur during the construction of the Scheme. Chapter 13: Transport and Access, ES Volume 1 [EN010143/APP/6.1] states that there will be no significant effects as a result of the Scheme on transport and access during operation.

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A CTMP will be produced prior to the commencement of development, to be substantially in accordance with the **Framework CTMP** submitted with the Application in **Appendix 13-5, ES Volume 2 [EN010143/APP/6.2]**.

In addition, the Scheme would include the provision of two permissive paths, as outlined in the **Framework PRow Management Plan [EN010143/APP/7.13]**.

Resource and Waste Management

Paragraph 5.15.6

Applicants must demonstrate that development proposals are in line with Defra’s policy position on the role of energy from waste in treating municipal waste.

Section 16.7 of Chapter 16, Other Environmental Topics of the ES

[EN010143/APP/6.1] considers the impacts of waste arising from the Scheme. It concludes that there will be no significant effects with regards to waste arising from the Scheme with the implementation of management measures as set out in the **Framework CEMP**

Paragraph 5.15.8

The applicant should set out the arrangements that are proposed for managing any waste produced and prepare a report that sets out the sustainable management of waste and use of resources throughout any relevant demolition, excavation and construction activities

[EN010143/APP/7.7] and Framework **DEMP [EN/010143/APP/7.9]** as well as a **Framework Site Waste Management Plan (Appendix 16-4, ES Volume 2 [EN010143/APP/6.2])**.

Paragraph 5.15.9

The arrangements described and a report setting out the sustainable management of waste and use of resources should include information on how re-use and recycling will be maximised in addition to the proposed waste recovery and disposal system for all waste generated by the development. They should also include an assessment of the impact of the waste arising from development on the capacity of waste management facilities to deal with other waste arising in the area for at least five years of operation

The Scheme aims to prioritise waste prevention, followed by preparing for re-use, recycling and recovery and lastly disposal to landfill as per the waste hierarchy. Waste arisings will be prevented and designed out where practicable. Residual

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Paragraph 5.15.10	The applicant is encouraged to refer to the 'Waste Prevention Programme for England' and 'Towards Zero Waste: Our Waste Strategy for Wales' and should seek to minimise the volume of waste produced and the volume of waste sent for disposal unless it can be demonstrated that this is the best overall environmental outcome.	waste will be transported off-site and delivered to the appropriately licenced receivers of such materials. Volumes of waste during construction and decommissioning may also put pressure on the capacity of local waste management facilities. It is proposed that this would be managed through a Construction Resource Management Plan (CRMP), which is secured by the Framework CEMP [EN010143/APP/7.7] . Therefore, effects are not expected to be significant
Paragraph 5.15.12	The UK is committed to moving towards a more 'circular economy'. Where possible, applicants are encouraged to source materials from recycled or reused sources and use low carbon materials, sustainable sources and local suppliers. Construction best practices should be used to ensure that material is reused or recycled onsite where possible	
Paragraph 5.15.13	Applicants are also encouraged to use construction best practices in relation to storing materials in an adequate and protected place on site to prevent waste, for example, from damage or vandalism. The use of Building Information Management tools (or similar) to record the materials used in construction can help to reduce waste in future decommissioning of facilities, by identifying materials that can be recycled or reused	
Paragraph 5.15.14	The Secretary of State should consider the extent to which the applicant has proposed an effective system for managing hazardous and non-hazardous waste arising from the construction, operation and decommissioning of the proposed development.	Potential sources of waste associated with the Scheme are set out by Section 16.7 of Chapter 16, Other Environmental Topics of the ES [EN010143/APP/6.1] . Should an environmental permitting (EP) regime relating to hazardous or non-hazardous waste be

Draft NPS EN-1 Relevant Paragraph	Draft NPS EN-1 Detail	Draft NPS EN-1 Proposed Development compliance
Paragraph 5.15.15	<p>The Secretary of State should be satisfied that:</p> <ul style="list-style-type: none"> • any such waste will be properly managed, both on-site and off-site. • the waste from the proposed facility can be dealt with appropriately by the waste infrastructure which is, or is likely to be, available. Such waste arisings should not have an adverse effect on the capacity of existing waste management facilities to deal with other waste arisings in the area. • adequate steps have been taken to minimise the volume of waste arisings, and of the volume of waste arisings sent to disposal, except where that is the best overall environmental outcome 	<p>required, the Applicant would demonstrate that processes are in place to meet the relevant EP requirements. The Consents and Agreements Position Statement [EN010143/APP/3.3] sets out information on the additional consents and licences that are or may be required to construct and operate the Scheme</p> <hr/> <p>During the construction, operation and decommissioning of the Scheme, the re-use or recycling of materials will be explored before resorting to landfill options.</p> <p>As detailed in Section 16.7 of Chapter 16, Other Environmental Topics of the ES [EN010143/APP/6.1] a Framework SWMP (Appendix 16-4, ES Volume 2 [EN010143/APP/6.2]) has been prepared to ensure recycling and reuse of materials is maximised. A SWMP will be prepared during the detailed design of the Scheme. The SWMP will be finalised with specific measures to be implemented prior to the start of construction. The SWMP will be secured by the DCO. It is not anticipated that there would be a significant effect on waste during the construction operation or decommissioning of the Scheme.</p>
Paragraph 5.15.16	<p>Where necessary, the Secretary of State should use requirements or obligations to ensure that appropriate measures for waste management are applied.</p>	
Paragraph 5.15.17	<p>The Secretary of State may wish to include a condition on revision of waste management plans at reasonable intervals when giving consent.</p>	
Paragraph 5.15.19	<p>The Secretary of State should have regard to any potential impacts on the achievement of resource efficiency and waste reduction targets set under the</p>	

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<p>Environment Act 2021 or wider goals set out in the government's Environmental Improvement Plan.</p>		
<p>Water Quality and Resources</p>		
<p>Paragraph 5.16.3</p>	<p>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 4.2 and 4.9)</p>	<p>Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 [EN010143/APP/6.1] undertakes an assessment of the Scheme's impacts on water quality, water resources and physical characteristics of the water environment. It takes account of how these impact may change as a result of climate change.</p> <p>The Site is located within the Humber River Basin District and the River Ouse is tidally influenced along its reach within the study area. Sea level allowances have been calculated for the lifetime of the development in line with the Environment Agency Flood Risk Assessments Climate Change Allowances guidance.</p>
<p>Paragraph 5.16.4</p>	<p>The applicant should make early contact with the relevant regulators, including the local authority, the Environment Agency and Marine Management Organisation, where appropriate, for relevant licensing and environmental permitting requirements.</p>	<p>Engagement has been undertaken with the Environment Agency as detailed in section 9.4 of Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 [EN010143/APP/6.1].</p>
<p>Paragraph 5.16.5</p>	<p>Where possible, applicants are encouraged to manage surface water during construction by treating surface water runoff from exposed topsoil prior to discharging and to limit the discharge of suspended solids e.g. from</p>	<p>Surface water mitigation and management measures during the construction of the Scheme will be according to best practice that are included within the Framework CEMP</p>

Draft NPS EN-1 Relevant Paragraph	Draft NPS EN-1 Detail	Draft NPS EN-1 Proposed Development compliance
	car parks or other areas of hard standing, during operation	
Paragraph 5.16.6	Applicants are encouraged to consider protective measures to control the risk of pollution to groundwater beyond those outlined in River Basin Management Plans and Groundwater Protection Zones - this could include, for example, the use of protective barriers	[EN010143/APP/7.7]. This will inform a CEMP, which will be produced and secured through the DCO.
Paragraph 5.16.7	<p>The ES should in particular describe:</p> <ul style="list-style-type: none"> • the existing quality of waters affected by the proposed project and the impacts of the proposed project on water quality, noting any relevant existing discharges, proposed new discharges and proposed changes to discharges • existing water resources affected by the proposed project and the impacts of the proposed project on water resources, noting any relevant existing abstraction rates, proposed new abstraction rates and proposed changes to abstraction rates (including any impact on or use of mains supplies and reference to Abstraction Licensing Strategies) and also demonstrate how proposals minimise the use of water resources and water consumption in the first instance • existing physical characteristics of the water environment (including quantity and dynamics of flow) affected by the proposed project and any impact of physical modifications to these characteristics • any impacts of the proposed project on water bodies or protected areas (including shellfish protected areas) under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 and 	<p>Section 9.5 of Chapter 9: Flood Risk, Drainage and water Environment, ES Volume 1 [EN010143/APP/6.1] provides an assessment of the baseline that complies with this policy. Chapter 9 also considers the impacts of climate change and cumulative effects.</p> <p>Appendix 9-2 of ES Volume 2 [EN010143/APP/6.2] includes a Water Framework Directive (WFD) Assessment, which assesses impacts on water bodies or protected areas under the WFD and SPZs.</p>

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	source protection zones (SPZs) around potable groundwater abstractions <ul style="list-style-type: none"> • how climate change could impact any of the above in the future • any cumulative effects 	
Paragraph 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	Mitigation measures during the construction of the Scheme will be according to best practice that are included within the Framework CEMP [EN010143/APP/7.7] which will inform a detailed CEMP, which will be secured by the DCO.
Paragraph 5.16.16	The Secretary of State should consider proposals to mitigate adverse effects on the water environment and any enhancement measures put forward by the applicant and whether appropriate requirements should be attached to any development consent and/or planning obligations are necessary.	Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 [EN010143/APP/6.1] sets out measures that are proposed to mitigate adverse effects on the water environment.

1.5 Table 5 Draft National Policy Statement for Renewable Energy Infrastructure (EN-3) DRAFT

Draft NPS EN-3 Relevant Paragraph	Draft NPS EN-3 Detail	Draft NPS EN-3 Proposed Development compliance
Climate Change Adaption		
Paragraph 3.4.10	<p>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:</p> <ul style="list-style-type: none">• increased risk of flooding; and• impact of higher temperatures.	<p>As outlined in Chapter 6: Climate Change of the ES [EN010143/APP/6.1], the effects of climate change have been taken into account in the design of the Scheme, and when considering how it will be constructed, operated and decommissioned. This includes:</p> <ol style="list-style-type: none">a. Adopting the Considerate Constructors Scheme (CCS)b. Encouraging to all construction staff to the use of lower carbon modes of transport by identifying and communicating local bus and rail connections and pedestrian and cycle access routes to/from the Scheme and providing appropriate facilities for the safe storage of cycles;c. Implementing a Framework CTMP (Appendix 13-5, ES Volume 2 [EN010143/APP/6.2]) to reduce the volume of construction staff and employee trips to the Site;d. Switching vehicles and plant off when not in use and ensuring construction vehicles conform to European Union (EU) vehicle

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emissions standards for the types of plant and vehicles to be used;

- e. Where practicable, maximise the use of alternative materials with lower embodied carbon such as locally sourced products and materials with a higher recycled content;
- f. Named person(s) – likely the Safety, Health and Environment Manager/ Ecological Clerk of Works (ECoW) – to monitor weather forecasts and receive of Environment Agency flood alerts to allow works to be planned and carried out accordingly to manage extreme weather conditions, such as storms and flooding; and
- g. Health and safety plans developed for construction activities will be required to account for potential climate change impacts on workers, such as flooding and heatwaves. To include measures such as toolbox talks on training on dangers of extreme weather conditions.
- h. Use of motion detection security lighting to avoid permanent lighting and reduce energy demand of the Scheme;
- i. Establish, monitor, and manage landscape and ecology mitigation and enhancement (BNG) measures embedded in the design, secured through the **Framework LEMP**

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[EN010143/APP/7.14], which has been submitted as part of the DCO application;

Further climate change resilience measures embedded within the Scheme, particularly in relation to flood risk are included in the **Framework CEMP [EN010143/APP/7.7]**. The specific flood risk impacts and associated mitigation measures are discussed in more detail in **Chapter 9: Flood Risk, Drainage and Surface Water, ES Volume 1 [EN010143/APP/6.2]**.

In addition, adaptation measures to reduce the effect of projected temperature increases on electrical equipment over the course of the Scheme's design life have been taken into account. PV inverters will have a cooling system installed to control the temperature and allow the inverters to operate efficiently in warmer conditions. The PV modules and transformers have a wide range of acceptable operation temperatures, and it has been determined that increasing temperatures will not adversely affect their operation.

A Framework CEMP [EN010143/APP/7.7], Framework OEMP [EN010143/APP/7.8] and Framework DEMP [EN010143/APP/7.9] will be developed into a detailed CEMP, OEMP and DEMP prior to the construction phase

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commences as a means to secure the embedded mitigation measures mentioned above.

Good Design

Paragraph 3.5.2

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 uses, and in the design of the project to mitigate impacts such as noise and effects on ecology and heritage

As detailed in the **Design and Access Statement [EN010143/APP/7.3]** and Section 6.3 of the **Planning Statement [EN010143/APP/7.2]**, the Scheme has been informed by a detailed and sensitive iterative design process. This has involved taking account of the context and features of the land within the Order limits, sensitive receptors, information from environmental surveys and feedback from stakeholders. The design also takes into account constraints and opportunities in order to develop a good design that balances the need to maximise renewable energy generation from the Scheme along with the minimisation of potential impacts or provision of mitigation and environmental enhancements where practicable. The design process and basis of design decisions are set out in **Chapter 3: Alternatives and Design Evolution [EN010143/APP/6.1], Volume 1 of the ES [EN010142/APP/6.1]** and the **Design and Access Statement [EN010142/APP/7.3]**

Flexibility

Paragraph 3.6.1

Where details are still to be finalised applicants should explain in the application which elements of the proposal

The applicant wishes to retain flexibility regarding the design detail of certain components of the

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	<p>have yet to be finalised, and the reason why this is the case</p>	<p>Scheme. The extent of flexibility required is described in Chapter 2: The Scheme, ES Volume 1 [EN010143/APP/6.1] and set out in the Design Principles Statement [EN010143/APP/7.4] and Design and Access Statement [EN010143/APP/7.3].</p>
<p>Paragraph 3.6.2</p>	<p>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</p>	<p>As set out in Chapter 2: The Scheme, ES Volume 1 [EN010143/APP/6.1] the application and EIA has been based on maximum and, if relevant, minimum parameters. To remain in accordance with the EIA Regulations, the parameters have remained as limited as practicable to ensure that the ‘likely significant effects’ are identified, rather than unrealistically amplified effects, which could be deemed to be unlikely. These parameters have been considered in detail by technical authors in this ES to ensure the realistic worst-case effects of the Scheme have been assessed for each potential receptor. This is of particular importance to maintain flexibility due to the rapid pace of change in solar PV technology.</p>
Need/Principle		
<p>Paragraph 3.10.1</p>	<p>The government has committed to sustained growth in solar capacity to ensure that we are on a pathway that allows us to meet net zero emissions. As such solar is a key part of the government’s strategy for low-cost decarbonisation of the energy sector.</p>	<p>This policy confirms the government’s commitment to sustained growth in solar capacity and the key role of solar in the government’s decarbonisation strategy. As set out in the Statement of Need [EN010143/APP/7.1] the</p>

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Paragraph 3.10.2	Solar also has an important role in delivering the government's goals for greater energy independence and the British Energy Security Strategy states that government expects a five-fold increase in solar deployment by 2035 (up to 70GW). It sets out that government is supportive of solar that is co-located with other functions (for example, agriculture, onshore wind generation, or storage) to maximise the efficiency of land use.	Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure and low-carbon electricity both during and beyond the critical 2020s timeframe. Maximising the capacity of generation in the resource-rich, well-connected and technically deliverable proposed location for the Scheme, represents a significant and economically rational step forwards in the fight against the global climate emergency.
Paragraph 3.10.4	Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation.	Draft NPS EN-3 explicitly recognises that solar projects can be deployed quickly so can meet the urgent need for renewable energy projects identified in Draft NPS EN-1, NPS EN-1 and other national policies and strategies. It also recognises that solar projects generate electricity affordably.
Paragraph 3.10.5	Solar farms can be built quickly and, coupled with consistent reductions in the cost of materials and improvements in the efficiency of panels ⁷⁴ , large-scale solar is now viable in some cases to deploy subsidy-free.	As set out in the Statement of Need [EN010143/APP/7.1] the Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure and low-carbon electricity both during and beyond the critical 2020s timeframe. Maximising the capacity of generation in the resource-rich, well-connected and technically deliverable proposed location for the Scheme, represents a significant and economically rational step

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		forwards in the fight against the global climate emergency.
Paragraph 3.10.6	Solar farm proposals are currently likely to consist of solar panel arrays, mounting structures, piles, inverters, transformers and cables	The Scheme will comprise the construction, operation (including maintenance) and decommissioning of a solar photovoltaic (PV) electricity generating facility, with a total capacity exceeding 50 megawatts (MW) and export connection to the national grid, at National Grid Drax Substation, and associated infrastructure.
Paragraph 3.10.7	Associated infrastructure may also be proposed such as energy storage, electrolyzers associated with the production of low carbon hydrogen, or security arrangements (which may encompass flood defences, fencing, lighting and surveillance).	Schedule 1 of the draft DCO
Paragraph 3.10.8	Along with associated infrastructure, a solar farm requires between 2 to 4 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.	<p>[EN010143/APP/3.1] sets out the description of the works for which consent is sought. Work No. 1 includes the ground mounted solar PV generating station, including solar panels fitted to mounting structures. It also includes field stations, which comprise the supporting infrastructure of inverters, transformers and switchgear. Further detail is provided in Chapter 2, ES Volume 1 [EN010143/APP6.1].</p> <p>As set out in the Statement of Need [EN010143/APP/7.1] the operational requirements needed for the east-west single axis tracker solar technology proposed and environmental mitigation measures required have determined the generating capacity of the Solar PV Site. As the Scheme delivers the east-west single axis tracker solar technology this has a</p>

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greater land take than the 2 to 4 acres per MW, specified by draft NPS EN-3 at paragraph 3.10.8, to allow spacing between panel arrays to avoid shading. This is considered appropriate to maximise energy generation from this type of solar technology.

Paragraph 3.10.9

The key considerations involved in the siting of a solar farm are likely to be influenced by factors set out in the following paragraphs, in addition to considerations specific to individual projects.

Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1] and the **Design and Access Statement [EN010143/APP/7.4]** set out the key considerations involved in the siting of the Scheme.

Irradiance and site Topography

Paragraph 3.10.10

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.

The location of the Scheme was chosen partly because the characteristics of the land in this part of East Yorkshire are optimal for the generation of renewable energy by solar PV. The land at this location has good levels of irradiation and large areas of flat land. The topography of the area is relatively flat with existing elevation ranges <10 m Above Ordnance Datum (AOD).

Paragraph 3.10.11

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 to further maximise the solar resource.

The Order limits have been located within an area of relatively low lying and flat landscape to maximise generation of energy and irradiance.

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The Scheme has adopted tracking panels that tilt to maximise energy generation within the Scheme.

Due to the fast pace of technology, the Scheme allows flexibility to be able to choose specific technology closer to the construction within the parameters defined in the Draft DCO and the **Outline Design Principles Statement [EN010143/APP/7.4]**. They will enable the optimum production of renewable energy within the Scheme.

Proximity to Dwellings

Paragraph 3.10.12

Utility-scale solar farms are large sites that may have a significant zone of visual influence. The two main impact issues that determine distances to sensitive receptors are therefore likely to be visual amenity and glint and glare. These are considered in Landscape, Visual and Residential Amenity (paragraphs 2.10.84- 2.10.92) and Glint and Glare (paragraphs 2.10.93 – 2.10.97) impact sections below

Chapter 10: Landscape and Visual Amenity, ES Volume 1 [EN0101043/APP/6.1] assesses the visual impacts of the Scheme. Through consultation with the relevant stakeholders, 29 viewpoints were chosen to illustrate the typical range of views of the Scheme as experienced from settlements, publicly accessible roads, and PRow towards the Scheme. These representative viewpoints are illustrated on **Figure 10-7: Representative Viewpoint Locations Plan, ES Volume 3 [EN0101043/APP/6.3]**.

The design mitigation which is outlined in section 10.6 of **Chapter 10: Landscape and Visual Amenity, ES Volume 1 [EN0101043/APP/6.1]**; the **Framework LEMP [EN010143/APP/7.14]**

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and the Design and Access Statement

[EN010143/APP/7.3] includes, but is not limited to, offsets from properties and local roads/PRoW; underground cabling within the Interconnecting Cable Corridor and Grid Connection Corridor; the height of the Solar PV panels;; and design of fencing which has aimed to reduce the visual impact of the Scheme upon sensitive receptors.

Significant adverse effects are predicted for visual receptors during construction and decommissioning however these are temporary effects.

During operation (Year 1), 10 of the viewpoints (3, 4, 5, 6, 7, 10a, 10b, 11, 14 and 19) and users of the Howden 20 long distance route will experience significant adverse effects, By Year 15 of operation these effects are reduced to not significant as a result of the establishment of proposed mitigation, enhancement and replacement planting and the management of existing hedgerow.

Given the size of the Scheme and the limited and localised visual effects predicted upon receptors, the Scheme's visual effects are clearly outweighed by the substantial benefits of the Scheme presented in Section 5 of the **Planning Statement [EN010143/APP/7.2]**, in particular the

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Agriculture and Land Classification		
Paragraph 3.10.13	Solar is a highly flexible technology and as such can be deployed on a wide variety of land types.	An assessment of land use is contained within Chapter 12: Socio-Economics and Land Use, ES Volume 1 [EN010143/APP/6.1] .
Paragraph 3.10.14	While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land (avoiding the use of “Best and Most Versatile” agricultural land where possible).	<p>An assessment of the Schemes impact on soils and agricultural Land is contained within Chapter 15: Soils and Agricultural Land, ES Volume 1 [EN010143/APP/6.1].</p> <p>The Applicant has sought to avoid urban areas and also landscape, ecology, green belt and heritage designations to refine the area of search in combination with the Agricultural Land Classification, when choosing the location of the Scheme. In addition to designations the Applicant sought to avoid large areas at the highest risk of fluvial flooding (Flood Zone 3) adjacent to National Grid Drax Substation.</p> <p>The location of the Scheme also considered irradiance and site topography.</p>

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Paragraph 3.10.15	Whilst the development of ground mounted solar arrays is not prohibited on agricultural land classified 1, 2 and 3a, 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 2.10.66 – 2.10.83 and 2.10.98 – 2.10.110.	<p>The Scheme is located mostly on lower quality agricultural land, with the majority of land (88.2%) being in land not classed as Best and Most Versatile (BMV).</p> <p>Agricultural land quality was a key consideration of the site selection process as set out in Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1].</p>
Paragraph 3.10.16	It is recognised that at this scale, it is likely that applicants’ developments may use some agricultural land. Applicants should explain their choice of site, noting the preference for development to be on brownfield and non-agricultural land.	<p>The Applicant has sought to avoid urban areas and also landscape, ecology, green belt and heritage designations to refine the area of search in combination with the Agricultural Land Classification, when choosing the location of the Scheme. In addition to designations the Applicant sought to avoid large areas at the highest risk of fluvial flooding (Flood Zone 3) adjacent to National Grid Drax Substation.</p> <p>The location of the Scheme also considered irradiance and site topography.</p>
Paragraph 3.10.17	Where sited on agricultural land, consideration may be given as to whether the proposal allows for continued agricultural use and/or can be co-located with other functions (for example, onshore wind generation, or storage) to maximise the efficiency of land use.	<p>The Scheme is located mostly on lower quality agricultural land, with the majority of land (88.2%) being in land not classed as Best and Most Versatile (BMV). For the Solar PV Site, 92% of the land used is non BMV land.</p> <p>The vast majority of agricultural land within the Order limits would be available for return to its existing agricultural use following</p>

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decommissioning of the Scheme. **Chapter 15: Soils and Agricultural Land, ES Volume 1 [EN010143/APP/6.1]** concludes that a very small amount (0.41 ha) of BMV Subgrade 3a land for tree planting would be permanently removed from agricultural use which would result in an ecological benefit. 8.97 ha of Subgrade 3b would be permanently removed from agricultural use as a result tree and hedge planting and 2 ha as a result of the potential retention of the Grid Connection Substations and associated accesses.

In addition, the conversion of arable to grassland during the 40 year operational period has the potential to accrue improvement to soil function over a large area during operation which has a slight beneficial effect.

The cumulative impacts of the Scheme with other existing and proposed energy sector developments is set out in **chapters 6 – 16, ES Volume 1 [EN010143/APP/6.1]** and is summarised in **Chapter 17: Cumulative Effects and Interactions, ES Volume 1 [EN010143/APP/6.1]**.

There will not be any new likely significant effects associated with cumulative effects that are not already accounted for by the assessment of the

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Paragraph 3.10.18

The Agricultural Land Classification (ALC) is the only approved system for grading agricultural quality in England and Wales and, if necessary, field surveys should be used to establish the ALC grades in accordance with the current, or any successor to it, grading criteria and identify the soil types to inform soil management at the construction, operation, and decommissioning phases in line with the Defra Construction Code.

Paragraph 3.10.19

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

Scheme. An exception is the functional improvement of soil resources that would follow conversion of arable to grassland when considered with the other solar farm proposals in North Yorkshire, which is considered to be moderately beneficial, which is significant.

It is also considered that the land beneath the solar PV arrays could be used for sheep grazing.

Agricultural land quality was a key consideration of the site selection process as set out in **Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1]**.

Baseline information on soils and agricultural land has been derived from published data, predictive modelling, and progressive stages of field survey. This is set out in more detail in **Chapter 15: Soils and Agricultural Land, ES Volume 1 [EN010143/APP/6.1]**.

A Framework Soils and Management Plan [EN010143/APP/7.10] has been produced, which sets out the principles on how the soils will be managed and protected during the construction, operation and decommissioning of the Scheme. A detailed soil resource management plan will be prepared prior to construction as secured by the DCO.

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	60% of England’s agricultural soils into sustainable management by 2030.	
Paragraph 3.10.136	<p>[Factors influencing site selection and design]</p> <p>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.</p>	<p>Chapter 15: Soils and Agricultural Land, ES Volume 1 [EN010143/APP/6.1] and the Framework Soils and Management Plan [EN010143/APP/7.10] sets out how agricultural land was considered in the design of the Scheme, the Scheme’s embedded mitigation measures, and principles on how the soils will be managed and protected during the construction, operation and decommissioning of the Scheme.</p>
Accessibility		
Paragraph 3.10.20	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.	
Paragraph 3.10.21	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	
Paragraph 3.10.22	Developers will usually need to construct on-site access routes for operation and maintenance activities, such as footpaths, earthworks, or landscaping.	
Paragraph 3.10.23	In addition, sometimes access routes will need to be constructed to connect solar farms to the public road network.	<p>Abnormal Indivisible Loads (AIL) vehicles have also been analysed along these routes to ensure safe journeys along the road network. The vehicle swept paths also demonstrate that construction vehicles will be able to turn in/out of the proposed site accesses.</p>

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Paragraph 3.10.24

Applications should include the full extent of the access routes necessary for operation and maintenance and an assessment of their effects.

Approximately 9.8 ha of land within the Site is illustrated on **Figure 1-3 ES Volume 3 [EN010143/APP/6.3]** as Site Accesses. These are areas of land, predominantly along or adjacent to the highway, which are required to facilitate access to the Solar PV Site and the Interconnecting and Grid Connection Corridors, such as new access routes, measures to provide better visibility splays. Where Site Accesses are identified outside of the public highway, these generally follow the line of existing farm accesses, such as the new access into Solar PV Area 3c from Rowlandhall Lane, or existing private roads such as those within Drax Power Station.

The full extent of the access routes necessary for operation and maintenance are set out in **Chapter 2: The Scheme, ES Volume 1 [EN010143/APP/6.1]**. An assessment of the Scheme's effect on access is set out in **Chapter 13: Transport and Access, ES Volume 1 [EN010143/APP/6.1]**.

This sets out that during construction, it has been identified that with embedded mitigation measures in place there could be potentially significant adverse effects at Link 15 in terms of construction traffic increase during the hours of 06:00-07:00 and 19:00-20:00. Over the course of

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a 24-hour period, during construction (and decommissioning), it is anticipated that Link 15 will see a 6% increase in total traffic and a 0% increase in HGV traffic. This indicates that the overall impact on the road network will be low at this link location during the hours of 07:00-19:00.

These effects will be temporary, and only occur during the construction of the Scheme. **Chapter 13: Transport and Access, ES Volume 1 [EN010143/APP/6.1]** states that there will be no significant effects as a result of the Scheme on transport and access during operation.

A Framework CTMP, ES Volume 2 [EN010143/APP/6.2] outlines measures that will be included in the final CTMP to mitigate transport impact, manage demand, and improve and encourage construction staff to access the Order limits by public transport, cycling and reduce car transport to, and parking at, the Order Limits.

PROW

Paragraph 3.10.25

Proposed developments may affect the provision of public rights of way networks.

The Scheme has been designed to have minimal impact on PRoW. As set out in the **Design and Access Statement [EN010143/APP/7.3]** the Scheme design maintains access to all existing

Paragraph 3.10.26

Public rights of way may need to be temporarily stopped 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

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	construction and protect users where a public right of way borders or crosses the site.	PRoW within the Order limits, with no permanent diversions or closures;
Paragraph 3.10.27	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.	It also ensures a minimum width for PRoW, as well as for the corridor in which they will be provided (between Scheme infrastructure). In all cases the PRoW will see perimeter fencing being installed a minimum distance from the centreline of the PRoW of 20 m to either side (creating a 40 m corridor) if the solar infrastructure is on both sides of the PRoW, and of 15 m if solar infrastructure lies to one side only. This will help avoid the perception of being channelled into narrow passages between solar PV panels;
Paragraph 3.10.28	Applicants are encouraged where possible to minimise the visual outlook from existing public rights of way, considering the impacts this may have on any other visual amenities in the surrounding landscape.	
Paragraph 3.10.29	Applicants should consider and maximise opportunities to facilitate enhancements to the public rights of way and the adoption of new public rights of way through site layout and design of access.	<p>The design proposes perimeters to be planted with species-rich grassland or flower rich grassland (Solar PV area 2f) and clumps of low-growing native woodland edge to break up channelled views created by the proposed Solar PV fencing, and would provide amenity for walkers, cyclists and horse-riders. It would also create new native hedgerows with trees along the Howden 20 Route and PRoW BUBWF10.</p> <p>In addition, two new Permissive Paths are proposed, which are routes available to the public during the operational life of the Scheme, as follows:</p>

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- a. A continuation of Bridleway SPALB08 which currently terminates at Johnson’s Farm. This will be a Permissive Path over which horse riders will be permitted to travel, running northbound for approximately 340 m until connecting with the second permissive route; and
- b. An eastbound route from footpath SPALF14 (north of Spaldington) parallel with Londesborough Drain to connect with the first Permissive Path, continuing eastwards to the edge of the habitat enhancement in Solar PV Area 1e running for approximately 1.4 km. This Permissive Path will allow horse riding over the majority of the extent of the route. The section travelling westbound from where the two permissive routes meet will permit passage by foot only, being of approximately 250 m in length.

Paragraph 3.10.30

Applicants should set out detail on how public rights of way would be managed to ensure they are safe to use is set out in an outline Public Rights of Way Management Plan

A Framework Public Right of Way Management Plan [EN010143/APP/7.14] has been submitted alongside the application. It is anticipated that a detailed Public Right of Way Management Plan will be required post consent as secured by the DCO.

Security and Lighting

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Paragraph 3.10.31	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.	Chapter 2: The Scheme, ES Volume 1 [EN010143/APP/6.1] outlines the security measures incorporated into the Scheme design. These measures and are taken into account in the assessment presented in the ES [EN010143/APP/6.1] . Efforts have been made to reduce the impact of security fencing and lighting, and are set out in detail in the Framework LEMP [EN010143/APP/7.14] , Framework CEMP [EN010143/APP/7.7] , Framework OEMP [EN010143/APP/7.8] and Framework DEMP [EN010143/APP/7.9] . Final versions of these documents will be produced and secured as part of the DCO.
Paragraph 3.10.32	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.	
Paragraph 3.10.33	Applicants should consider the need to minimise the impact on the landscape and the visual impact of security measures	
Network Connection		
Paragraph 3.10.35	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.	Proximity to an available grid connection with appropriate capacity is fundamental to the viability and deliverability of a solar farm. The Applicant undertook a search of available capacity within East Yorkshire and, following discussions with National Grid, secured a point of connection to the national electricity transmission system at Drax.
Paragraph 3.10.36	Larger developments may seek connection to the transmission network if there is available network capacity and/or supportive infrastructure.	
Paragraph 3.10.37	In either case the connection voltage, availability of network capacity, and the distance from the solar farm to the existing network can have a significant effect on the commercial feasibility of a development proposal	The National Grid Drax Substation has capacity and availability to accept the electricity generated by the Scheme.

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Paragraph 3.10.38	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.	Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1] provides further discussion on the decision leading to the agreed network connection.
Paragraph 3.10.39	Where this is the case, applicants should consider the cumulative impacts of situating a solar farm in proximity to other energy generating stations and infrastructure	The cumulative impact of the Scheme and other developments in the area, is presented in Chapter 17: Cumulative Effects and Interactions, ES Volume 1 [EN010143/APP/6.1] .
Site layout design and appearance		
Paragraph 3.10.51	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.	As detailed in the Design and Access Statement [EN010143/APP/7.3] and Section 6.3 of the Planning Statement [EN010143/APP/7.2] , the Scheme has been informed by a detailed and sensitive iterative design process. This has involved taking account of the context and features of the land within the Order limits, sensitive receptors, information from environmental surveys and feedback from stakeholders. The design also takes into account constraints and opportunities in order to develop a good design that balances the need to maximise renewable energy generation from the Scheme along with the minimisation of potential impacts or provision of mitigation and environmental enhancements where practicable. The design process and basis of design
Paragraph 3.10.52	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.	

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Paragraph 3.10.53	<p>In terms of design and layout, applicants may favour a south-facing arrangement of panels to maximise output although other orientations may be chosen. For example, an east-west layout, whilst likely to result in reduced output compared to south-facing panels on a panel-by-panel basis, may allow for a greater density of panels to compensate and therefore for generation to be spread more evenly throughout the day.</p>	<p>decisions are set out in Chapter 3: Alternatives and Design Evolution [EN010143/APP/6.1], Volume 1 of the ES [EN010142/APP/6.1] and the Design and Access Statement [EN010142/APP/7.3]</p> <hr/> <p>Objective 1 in the Design and Access Statement [EN010143/APP/7.3] seeks to ensure that the Scheme efficiently generates a large amount of electricity which would contribute to decarbonisation of energy generation and net zero.</p> <p>To achieve this the Scheme has adopted tracking panels that tilt to maximise energy generation within the Scheme.</p> <p>Due to the fast pace of technology, the Scheme allows flexibility to be able to choose specific technology closer to the construction within the parameters defined in the Draft DCO and the Outline Design Principles Statement [EN010143/APP/7.4]. They will enable the optimum production of renewable energy within the Scheme.</p>
Paragraph 3.10.54	<p>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.</p>	<p>The Applicant has secured a connection to the National Grid via a new below ground grid connection cable located within the Grid Connection Corridor. This will connect the new on-site Substation with the existing National Grid Drax Substation. Further details are included in</p>
Paragraph 3.10.55	<p>In the case of underground cabling, applicants are expected to provide a method statement describing cable</p>	

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	trench design, installation methodology, as well as details of the operation and maintenance regime.	the Grid Connection Statement [EN010143/APP/7.5] .
Project Lifetime and decommissioning		
Paragraph 3.10.60	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	<p>Details of the decommissioning phase, including which elements will be decommissioned and which will be retained are provided in Chapter 2: The Scheme, ES Volume 1 [EN010143/APP/6.1]. This states that, it is possible that the Grid Connection Substations and Grid Connection Cables may remain in place/operational after decommissioning of the Solar Farm. It is anticipated however that the majority of the Solar PV Site will be returned to its original use and condition after decommissioning.</p> <p>It is common practice for infrastructure such as 132 kV Substations and their associated export cables (i.e., the Grid Connection Substations and Grid Connection Cables) to be retained and used for another purpose after the development they were originally installed to support is decommissioned. Therefore, it is possible that the Grid Connection Substations and Grid Connection Cables may remain in place/operational after decommissioning of the Solar Farm. This cannot be confirmed at this time and will depend upon demand closer to the decommissioning date. Where retention /decommissioning of this infrastructure is</p>

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		<p>relevant, the technical assessments presented in Chapters 6 to 6 of this ES have considered a worst case in respect to that discipline.</p> <p>A Framework DEMP [EN/010143/APP/7.9] is included with the DCO Application. This sets out the general principles to be followed in the decommissioning of the Scheme. A detailed DEMP be prepared and agreed with the relevant authorities at that time of decommissioning, in advance of the commencement of decommissioning works, and would include timescales and transportation methods.</p>
<p>Paragraph 3.10.138</p>	<p>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</p>	<p>The design life of the Scheme is 40 years with decommissioning to commence 40 years after final commissioning (currently anticipated to be 2027 to 2067).</p>
<p>Paragraph 3.10.139</p>	<p>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</p>	<p>The Scheme will be decommissioned at the end of its operational life in accordance with a Framework DEMP [EN/010143/APP/7.9]. A detailed DEMP be prepared and agreed with the relevant authorities at that time of decommissioning, in advance of the commencement of decommissioning works, and would include timescales and transportation methods.</p>
<p>Paragraph 3.10.140</p>	<p>An upper limit of 40 years is typical, although applicants may seek consent without a time period or for differing time-periods for operation</p>	

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Paragraph 3.10.141	The time limited nature of the solar farm, where a time limit is sought as a condition of consent, is likely to be an important consideration for the Secretary of State.	The design life of the Scheme is 40 years with decommissioning to commence 40 years after final commissioning (currently anticipated to be 2027 to 2067).
Paragraph 3.10.142	The Secretary of State should consider the period of time the applicant is seeking to operate the generating station as well as the extent to which the site will return to its original state when assessing impacts such as landscape and visual effects and potential effects on the settings of heritage assets and nationally designated landscapes	The Scheme will be decommissioned at the end of its operational life in accordance with a Framework DEMP [EN/010143/APP/7.9] . A detailed DEMP be prepared and agreed with the relevant authorities at that time of decommissioning, in advance of the commencement of decommissioning works, and would include timescales and transportation methods. Chapter 2: The Scheme, ES Volume 1 [EN010143/APP/6.1] describes how the Order limits would be left on completion of decommissioning.
Flexibility		
Paragraph 3.10.61	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: <ul style="list-style-type: none"> • 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 required is described in Chapter 2: The Scheme, ES Volume 1 [EN010143/APP/6.1] and set out in the Design Principles Statement [EN010143/APP/7.4] and Design and Access Statement [EN010143/APP/7.3] .

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Paragraph 3.10.62	Applicants should set out a range of options based on different panel numbers, types and layout, with and without storage.	<p>Chapter 5: Environmental Impact Assessment Methodology and Chapter 2: the Scheme, ES Volume 1 [EN010143/APP/6.1] explain that the parameters for the Scheme are defined by the Design Principles Statement [EN010143/APP/7.4] which have been informed by the assessments in the ES [EN010143/APP/6.1] and reciprocally used for assessment purposes. Where there is uncertainty, the Applicant has assessed the worst case scenario for the purposes of the ES.</p>
Paragraph 3.10.63	Guidance on how applicants should manage flexibility is set out at Section 2.6 of this NPS.	
Biodiversity and Ecological Conservation		
Paragraph 3.10.67	The applicant’s ecological assessments should identify any ecological risk from developing on the proposed site.	<p>Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] identifies ecological risks from developing the Scheme. It has assessed impacts on habitats, ground nesting birds, wintering and migratory birds, bats, dormice, reptiles, great crested newts, water voles and badgers. This has been informed by a desk study and field surveys.</p>
Paragraph 3.10.68	Issues that need assessment may include habitats, ground nesting birds, wintering and migratory birds, bats, dormice, reptiles, great crested newts, water voles and badgers	
Paragraph 3.10.69	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	<p>Section 8.7 of Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] sets out the expected effects on the above receptors during the construction, operation and decommissioning phases of the Scheme. This concludes that with the application of embedded and additional mitigation measures set out in Chapter 8:</p>
Paragraph 3.10.70	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	

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		<p>Ecology, ES Volume 1 [EN010143/APP/6.1] no residual significant adverse effects have been identified on any internationally, nationally or locally designated sites during construction, operation or decommissioning of the Scheme.</p>
Paragraph 3.10.71	Applicants should consider earthworks associated with construction compounds, access roads and cable trenching.	Section 2.6 of Chapter 2: The Scheme, ES Volume 1 [EN010143/APP/6.1] describes the works required for construction, including cable installation which will include earthworks.
Paragraph 3.10.72	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 2.10.18 and 2.10.19.	<p>A Framework Soils and Management Plan [EN010143/APP/7.10] sets out the principles on how the soils will be managed and protected during the construction, operation and decommissioning of the Scheme. A detailed soil resource management plan will be prepared prior to construction as secured by DCO Requirement.</p> <p>This sets out that soils will be stripped, stored, and replaced separately to minimise soil damage, and provide optimal conditions for site restoration.</p>
Paragraph 3.10.73	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	Security, lighting and CCTV required for the Scheme are described in detail in Chapter 2: The Scheme, ES Volume 1 [EN010143/APP/6.1], CEMP [EN010143/APP/7.7], Framework OEMP [EN010143/APP/7.8] and Framework DEMP [EN010143/APP/7.9].

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Works will be restricted to daylight hours wherever practicable to remove the need for artificial lighting, with focussed task-specific lighting provided where this is not practicable.

Within construction compounds and at welfare areas, PIR controlled lights (motion sensors) will be used outside of core working hours. Where lighting is required, it will conform to best practice guidelines with respect to minimising light spill into adjacent habitats and prevent disturbance to bats and other species, including Institute of Lighting Professionals Guidance Notes (in particular GN08/23 Bats and Artificial Lighting at Night (Ref 8 34) which was produced in collaboration with the Bat Conservation Trust, and GN-1: Reduction of Obtrusive Light (Ref 8 35) in so far as it is reasonably practicable.

Paragraph 3.10.74

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 [EN010143/APP/6.1]** takes account of all works to boundaries and hedgerows. Buffers to woodland and hedgerow are included, and proposals for fencing incorporate features to enable the movement of mammals, reptiles and other fauna. These are set out in **Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1]**.

Paragraph 3.10.80

Solar farms have the potential to increase the biodiversity value of a site, especially if the land was

The Applicant is committed to exceeding the Government's 10% target for biodiversity net gain

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	previously intensively managed. In some instances, this can result in significant benefits and enhancements beyond Biodiversity Net Gain, which result in wider environmental gains which is encouraged.	as set out in the Environment Act 2021. A Biodiversity Net Gain (BNG) report [EN010143/APP/6.2] , Natural England’s Biodiversity Metric 4.0, has been produced for the DCO Application. This report demonstrates that the Scheme has the potential to deliver significant biodiversity net gain on the Site, with 80% gain predicted for habitat biodiversity units.
Paragraph 3.10.81	For projects in England, applicants should consider enhancement, management, and monitoring of biodiversity in line with the ambition set out in the Environmental Improvement Plan and any relevant measures and targets, including statutory targets set under the Environment Act or elsewhere.	
Paragraph 3.10.119	In England, proposed enhancements should take account of the above factors and as set out in Section 5.4 of EN-1 aim to achieve environmental and biodiversity net gain in line with the ambition set out in the Environmental Improvement Plan and any relevant measures and targets, including statutory targets set under the Environment Act or elsewhere	<p>The design includes features such as areas of new grassland and woodland, with an aim to enhance the biodiversity of the Site. The agreed design for the ES is at Figure 2-3, ES Volume 3 [EN010143/APP/6.3].</p> <p>The Applicant is committed to exceeding the Government’s 10% target for biodiversity net gain as set out in the Environment Act 2021. A Biodiversity Net Gain (BNG) report [EN010143/APP/6.2], Natural England’s Biodiversity Metric 4.0, has been produced for the DCO Application. This report demonstrates that the Scheme has the potential to deliver significant biodiversity net gain on the Site, with 80% gain predicted for habitat biodiversity units.</p>
Paragraph 3.10.120	This might include maintaining or extending existing habitats and potentially creating new important habitats, for example by installing cultivated strips/plots for rare	The Scheme includes many measures to extend existing habitats and create new important

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	arable plants, rough grassland margins, bumble bee plant mixes, and wild bird seed mixes.	habitats. These are set out in the Framework LEMP [EN010143/APP/7.14] .
Paragraph 3.10.121	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 and operation as set out in the Framework LEMP [EN010143/APP/7.14] , Framework CEMP [EN010143/APP/7.7] , Framework OEMP [EN010143/APP/7.8] , and Framework DEMP [EN010143/APP/7.9] .
Drainage		
Paragraph 3.10.75	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.	An FRA is provided at Appendix 9-3, ES Volume 2 [EN010143/APP/6.2] . The FRA considers the impacts of drainage. The preparation of the FRA, and the ES has taken account of advice and consultation with key bodies.
Paragraph 3.10.76	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 runoff where recommended.	A Framework Surface Water Drainage Strategy has been prepared (see Appendix 9-4, ES Volume 2 [EN010143/APP/6.2]) which sets out the framework drainage strategy for the Scheme. This provides details on the management of surface water for Solar PV Area 1c and the Grid Connection Substations. A detailed strategy will be provided post-consent following the detailed design of the Grid Connection Substations and informed by infiltration testing, as secured through the DCO.
Paragraph 3.10.77	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.	
Paragraph 3.10.78	Culverting existing watercourses/drainage ditches should be avoided.	
Paragraph 3.10.79	Where culverting for access is unavoidable, applicants should demonstrate that no reasonable alternatives exist	

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	<p>and where necessary it will only be in place temporarily for the construction period.</p>	<p>Mitigation measures such as the use of localised SuDS, such as swales and infiltration trenches, will be used to control runoff if required.</p> <p>The FRA, and associated Sequential Test Report Appendix 9-3, ES Volume 2 [EN010143/APP/6.2] set out how the Scheme has undertaken a sequential site selection process, which avoids the need to impact on existing drainage systems and watercourses.</p> <p>There would be no new culverts as part of the Scheme, but existing culverts may be upgraded or slightly extended.</p>
<p>Paragraph 3.10.83</p>	<p>Applicants should consider whether they need to provide geotechnical and hydrological information (such as identifying the presence of peat at each site) including the risk of landslide connected to any development work</p>	<p>The Applicant does not consider that this information is required due to the nature of the Scheme.</p>
<p>Paragraph 3.10.145</p>	<p>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.</p>	<p>The submitted Framework Surface Water Drainage Strategy Appendix 9-4, ES Volume 2 [EN010143/APP/6.2], sets out how water and drainage will be managed as part of the Scheme.</p>

Landscape, Visual and Residential Amenity

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Paragraph 3.10.85	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.	An assessment of the potential landscape and visual impacts associated with the construction, operation and decommissioning of the Scheme has been carried out and is presented in Chapter 10: Landscape and Visual Amenity, ES Volume 1 [EN010143/APP/6.1] .
Paragraph 3.10.86	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	Photographs and visualisations have been included to assist in describing baseline views and visual effects with referenced to the viewpoints, which have been agreed with local planning authorities. Viewpoint photography is in accordance with Visual Representation of Development Proposals, Technical Guidance Note 06/19 and is contained within Figures 10-9 to 10-36, ES Volume 3 [EN010143/APP/6.1] .
Paragraph 3.10.87	Landscape and visual impacts should be considered carefully preapplication. Potential impacts on the statutory purposes of nationally designated landscapes should form a part of the pre application process.	
Paragraph 3.10.88	Applicants should carry out a landscape and visual assessment and report it in the ES. Visualisations may be required to demonstrate the effects of a proposed solar farm on the setting of heritage assets and any nearby residential areas or viewpoints.	
Paragraph 3.10.89	Applicants should follow the criteria for good design set out in Section 4.6 of EN-1 when developing projects and will be expected to direct considerable effort towards minimising the landscape and visual impact of solar PV arrays especially within nationally designated landscapes.	While the appearance of solar panels is largely set by their function, the site layout, landscaping and access design have all been designed to reflect good design principles.

**Draft NPS EN-3
Relevant Paragraph**

**Draft NPS EN-3
Detail**

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Proposed Development compliance**

Paragraph 3.10.90

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 s 2.10.31 – 2.10.33 above)

Good design has been a key consideration from the outset. The LVIA has informed the iterative design process, which is set out in the **Design and Access Statement [EN010143/APP/7.3]**. The Scheme layout and design has been developed in response to policy requirements, published landscape character assessment guidance and fieldwork analysis. The design mitigation has been embedded in the Scheme to minimise effects on landscape character and visual amenity as shown in the **Framework LEMP [EN010143/APP/7.14]**. This will inform a detailed LEMP which will be secured by the DCO. The landscape design principles aim to achieve the following:

1. Careful siting in the landscape
2. Conserving the existing vegetation patterns
3. Creating new green infrastructure
4. Sensitive Design in Relation to Form, Colour, and Materials
5. Sensitive Design of Lighting

The proposed fencing has been designed to minimise its visual prominence and is detailed in **Chapter 2: The Scheme, ES Volume 1 [EN010143/APP/6.1]**.

Draft NPS EN-3 Relevant Paragraph	Draft NPS EN-3 Detail	Draft NPS EN-3 Proposed Development compliance
Paragraph 3.10.91	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.	The overall objective of the landscape design is to integrate the Scheme into its landscape setting and avoid or minimise adverse landscape and visual effects as far as practicable, by retaining and following existing features, including vegetation.
Paragraph 3.10.92	The impact of the proposed development on established trees and hedges should be informed by a tree survey and arboricultural/hedge assessment as appropriate	<p>The layout of the Scheme has been designed to minimise the loss of, and avoid significant impacts on, existing landscape features, where practicable. This includes minimum offsets of:</p> <ul style="list-style-type: none"> a. 15 m from woodlands (noting there is no ancient woodland within or adjacent to the Site); b. 10 m from hedgerows increasing to 15 m where there are hedgerow trees; c. 15 m from individual trees; <p>The measures taken to protect and retain vegetation, and proposed vegetation planting and management is set out in the Framework LEMP [EN010143/APP/7.14]</p> <p>An Arboricultural Impact Assessment Appendix 10-5, ES Volume 2 [EN010143/APP/6.2] sets out the results of tree surveys, which has informed the assessment of impacts on trees and hedges as set out in</p>

Draft NPS EN-3 Relevant Paragraph	Draft NPS EN-3 Detail	Draft NPS EN-3 Proposed Development compliance
Paragraph 3.10.122	Applicants should consider the potential to mitigate landscape and visual impacts through, for example, screening with native hedges, trees and woodlands.	<p>Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1]</p>
Paragraph 3.10.123	Applicants should aim to minimise the use and height of security fencing. Where possible applicants should utilise existing features, such as hedges or landscaping, to assist in site security or screen security fencing.	<p>The Scheme’s design aims to filter and screen more prominent views of the Scheme from visual receptors. Chapter 1-: LVIA, ES Volume 1 [EN010143/APP/6.1] states that there will be a high degree of screening by intervening vegetation to be retained to some receptors, and proposed mitigation planting, would provide screening to a number of other receptors, including a robust boundary to screen the Solar PV Areas from Willitoft.</p>
Paragraph 3.10.124	Applicants should minimise the use of security lighting. Any lighting should utilise a passive infra-red (PIR) technology and should be designed and installed in a manner which minimises impact.	<p>In response to consultation both of the proposed Grid Connection Substations are now located in Solar PV Area 1c (Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1]), and represent the tallest elements to the Scheme. Solar PV Area 1c is located within a small field which provides visual containment via a robust boundary of hedgerow and mature trees in order to maximise screening of the infrastructure.</p> <p>The proposed fencing has been designed to minimise its visual prominence and is detailed in Chapter 2: The Scheme, ES Volume 1 [EN010143/APP/6.1].</p>

**Draft NPS EN-3
Relevant Paragraph**

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Detail**

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Proposed Development compliance**

Paragraph 3.10.148

The Secretary of State will consider the landscape and visual impact of any proposed solar PV farm, taking account of any sensitive visual receptors, and the effect of the development on landscape character, together with the possible cumulative effect with any existing or proposed development. Nationally designated landscapes (National Parks, The Broads and Areas of Outstanding Beauty) are afforded extra protection due their statutory purpose. Development in these areas needs to satisfy policy as set out in EN-1 Section 5.10.

The CCTV will use thermal imaging and Infrared (IR) lighting to provide night vision functionality meaning that no visible lighting will be needed for security.

Chapter 10: Landscape and Visual Amenity, ES Volume 1 [EN010143/APP/6.1] concludes that the Scheme will not result in significant impacts to National Landscape Character Areas.

Chapter 10: Landscape and Visual Amenity, ES Volume 1 [EN010143/APP/6.1] concludes that it is not considered that the Scheme would result in significant landscape effects to the local Landscape Character Areas during construction.

The assessment of likely impacts and effects (with embedded mitigation in place) has determined that the Scheme is likely to result in a significant adverse effect on the Howden to Bubwith LCA 5A during Operation Year 1 and Year 15 reducing to not significant during decommissioning. The Scheme is likely to result in a significant adverse effect on the West of Holme on Spalding Moor Farmland LCA 5B during Operation Year 1, with effects reducing to not significant during operation and decommissioning. It is assessed that none of the remaining character areas will experience significant effects at all assessment scenarios.

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It is considered that the limited and reversible landscape and visual effects of the Scheme are clearly and comprehensively outweighed by the benefits of the Scheme in terms of delivering renewable energy infrastructure which is urgently needed in order to create a secure and affordable energy system and to help combat climate change. Therefore, in accordance with this policy, the level of landscape impacts are not considered to be so damaging that they are not offset by the benefits of the Scheme.

Glint and Glare

Paragraph 3.10.93

Solar panels are specifically designed to absorb, not reflect, irradiation. However, solar panels may reflect the sun's rays at certain angles, causing glint and glare. Glint is defined as a momentary flash of light that may be produced as a direct reflection of the sun in the solar panel. Glare is a continuous source of excessive brightness experienced by a stationary observer located in the path of reflected sunlight from the face of the panel. The effect occurs when the solar panel is stationed between or at an angle of the sun and the receptor.

Chapter 16: Other Environmental Topics, ES Volume 1 [EN010143/APP/6.1] has undertaken an assessment of potential impacts of glint and glare on nearby residential receptors, road receptors, PRow, and aviation infrastructure.

It concludes that there is predicted to be low impacts at one runway approach path, whilst the remaining aviation receptors are predicted to have no impacts. There are no impacts to ground-based receptors. Therefore, the overall effects are considered to be negligible.

Paragraph 3.10.94

Applicants should map receptors to qualitatively identify potential glint and glare issues and determine if a glint and glare assessment is necessary as part of the application.

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Paragraph 3.10.95	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.	
Paragraph 3.10.96	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.	
Paragraph 3.10.97	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	
Paragraph 3.10.125	Applicants should minimise the use of security lighting. Any lighting should utilise a passive infra-red (PIR) technology and should be designed and installed in a manner which minimises impact.	As set out in Chapter 2: The Scheme, ES Volume 1 [EN010143/APP/6.1] , pole mounted internal facing closed circuit television (CCTV) systems will be deployed around the perimeter of the operational areas of the Solar PV Site. The CCTV cameras will have fixed, inward-facing viewsheds and will be aligned to capture only the perimeter fence and the area inside the fence, thereby not capturing publicly accessible areas. The CCTV will use thermal imaging and Infrared (IR) lighting to provide night vision functionality meaning that no visible lighting will be needed for security.

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Paragraph 3.10.126	Applicants may consider using screening between potentially affected receptors and the reflecting panels to mitigate the effects.	Chapter 16: Other Environmental Topics, ES Volume 1 [EN010143/APP/6.1] has undertaken an assessment of potential impacts of glint and glare on nearby residential receptors, road receptors, PRow, and aviation infrastructure. It concludes that is predicted to be low impacts at one runway approach path, whilst the remaining aviation receptors are predicted to have no impacts. There are no impacts to ground-based receptors. Therefore, the overall effects are considered to be negligible.
Paragraph 3.10.127	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	Chapter 16: Other Environmental Topics, ES Volume 1 [EN010143/APP/6.1] has undertaken an assessment of potential impacts of glint and glare on nearby residential receptors, road receptors, PRow, and aviation infrastructure. It concludes that is predicted to be low impacts at one runway approach path, whilst the remaining aviation receptors are predicted to have no impacts. There are no impacts to ground-based receptors. Therefore, the overall effects are considered to be negligible
Paragraph 3.10.149	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	Chapter 16: Other Environmental Topics, ES Volume 1 [EN010143/APP/6.1] has undertaken an assessment of potential impacts of glint and

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Paragraph 3.10.150	<p>infrastructure (including aircraft departure and arrival flight paths).</p> <p>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</p>	<p>glare on nearby residential receptors, road receptors, PRoW, and aviation infrastructure.</p> <p>It concludes that there is predicted to be low impacts at one runway approach path, whilst the remaining aviation receptors are predicted to have no impacts. There are no impacts to ground-based receptors. Therefore, the overall effects are considered to be negligible.</p>
Cultural Heritage		
Paragraph 3.10.98	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.	Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] undertakes an assessment on the historic environment, including above and below ground assets.
Paragraph 3.10.99	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.	It concludes that there would be no significant impacts to any designated heritage assets, including Listed Buildings, or the Historic Landscape Character as a result of the Scheme.
Paragraph 3.10.100	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.	Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] concludes that the Scheme would result in significant effects to eight non-designated heritage assets. These comprise of Hagthorpe moated site, which is a non-designated asset of schedulable quality, the historic farmstead at Johnson’s Far, and six archaeological assets (six areas of Romano-
Paragraph 3.10.101	Equally solar PV developments may have a positive effect, for example archaeological assets may be protected by a solar PV farm as the site is removed from regular ploughing and shoes or low-level piling is stipulated.	

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British settlement archaeology). Therefore, additional mitigation in the form of a programme of archaeological excavation and recording is proposed, and will be set out in an Overarching Written Scheme of Investigation for Archaeological Mitigation.

It is acknowledged that while archaeological excavation and recording would not minimise the physical impact to these assets, as the archaeological evidence would still be removed, it would compensate for their loss by preserving them by record; thereby allowing their continued study and achieving greater understanding and appreciation of their heritage value. This would reduce the magnitude of impact on individual assets, resulting in a residual minor adverse effect, which is not significant.

Paragraph 3.10.103

Applicant assessments should be informed by information from Historic Environment Records (HERs)⁸⁷ or the local authority.

The assessment set out in **Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1]** has been informed by the HER.

Paragraph 3.10.104

Where a site on which development is proposed includes, or has the potential to, include heritage assets with archaeological interest, the applicant should submit an appropriate desk-based assessment and, where necessary, a field evaluation. These should be carried out, using expertise where necessary and in consultation with the local planning authority, and should identify archaeological study areas and propose appropriate

A detailed baseline is set out in the DBA, **Appendix 7-2: Cultural Heritage Desk-Based Assessment, ES Volume 2 [EN010143/APP/6.2]**, which also contains a gazetteer of heritage assets. The location of heritage assets, previous archaeological events and indicative illustrations of historic landscape

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	schemes of investigation, and design measures, to ensure the protection of relevant heritage assets	<p>character are presented in Figure 7-1 to Figure 7-4 in ES Volume 3 [EN010143/APP/6.3].</p> <p>An archaeological trial trenching report is submitted as Appendix 7-4: Archaeological Trial Trenching Evaluation Report, ES Volume 2 [EN010143/APP/6.2]. The scope of this report has been agreed during consultation meetings with North Yorkshire Council.</p>
Paragraph 3.10.105	In some instances, field studies may include investigative work (and may include trial trenching beyond the boundary of the proposed site) to assess the impacts of any ground disturbance, such as proposed cabling, substation foundations or mounting supports for solar panels on archaeological assets.	Archaeological trial trench evaluation has been carried out for the Scheme and potential impacts to buried archaeological features confirmed as being present within the Order limits by the trial trenching is included in Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] .
Paragraph 3.10.106	The extent of investigative work should be proportionate to the sensitivity of, and extent of proposed ground disturbance in, the associated study area	<p>The trial trenching report is submitted as Appendix 7-4: Archaeological Trial Trenching Evaluation Report, ES Volume 2 [EN010143/APP/6.2].</p> <p>The scope of archaeological trial trenching has been agreed during consultation meetings with North Yorkshire Council, and is proportionate to the sensitivity of the study area chosen. The results are presented in Appendix 7-4: Archaeological Trial Trenching Evaluation Report, ES Volume 2 [EN010143/APP/6.2].</p>
Paragraph 3.10.107	Applicants should take account of the results of historic environment assessments in their design proposal	The Design and Access Statement [EN010143/APP/7.3] sets out how the Scheme

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Paragraph 3.10.108	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.	has taken account of the results of the historic assessment in its design.
Paragraph 3.10.109	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.	<p>Chapter 7: Cultural Heritage, ES Volume1 [EN010143/APP/6.1] describes the heritage assets within the study area for the Scheme and their significance, and the contribution of their setting to that significance.</p>
Paragraph 3.10.110	Applicants may need to include visualisations to demonstrate the effects of a proposed solar farm on the setting of heritage assets.	<p>Section 7.6 of Chapter 7: Cultural Heritage, ES Volume1 [EN010143/APP/6.1] outlines the steps taken to ensure heritage assets are conserved in a manner appropriate to their significance, including embedded mitigation to protect view important on assets settings. This includes the provision of buffers between the Scheme and heritage assets in order to help to preserve their setting during the construction, operational and decommissioning periods.</p> <p>Sections 7.7 and 7.8 of Chapter 7: Cultural Heritage, ES Volume1 [EN010143/APP/6.1] contains a clear assessment of likely impacts and effects of the Scheme on cultural heritage. All effects are considered, including noise, vibration, light and indirect impacts, although given that after construction the Scheme would generate little noise, vibration or light, the majority of impacts are as a result of direct impacts (for non-designated archaeological assets) or impacts on</p>

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Paragraph 3.10.128	The ability of the applicants to microsite specific elements of the proposed development during the construction phase should be an important consideration by the Secretary of State when assessing the risk of damage to archaeology.	the setting of heritage assets due to the Scheme being visible from or present within the setting.
Paragraph 3.10.129	Where requested by the applicant, the Secretary of State should consider granting consents which allow for the micrositeing 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.	The Scheme will be in accordance with the parameters set out in the Design Principles Statement [EN010143/APP/7.4] , providing flexibility to amend the design should significant archaeological finds be discovered. Flexibility has also been allowed within the Order limits of the Grid Connection Corridor so that the precise cable route can be moved if necessary to reduce impacts on remains, should they be found.
Paragraph 3.10.151	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	As stated in Chapter 2: The Scheme, ES Volume 1 [EN010143/APP/6.1] , the design life of the Scheme is expected to be 40 years. Chapter 7: Cultural Heritage, ES Volume1 [EN010143/APP/6.1] concludes that there would be no significant impacts to any designated or non-designated assets as a result of the Scheme, once embedded and additional mitigation measures are implemented. Chapter 7: Cultural Heritage, ES Volume1 [EN010143/APP/6.1] states that the conclusions of its assessment are not affected by the timing or phasing of construction or decommissioning, should they occur later or be carried out over a

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longer duration than that outlined in **Chapter 2: The Scheme, ES Volume 1 [EN010143/APP/6.1]**.

Paragraph 3.10.153	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.	Chapter 13: Transport and Access, ES Volume 1 [EN010143/APP/6.1] concludes that there would be limited traffic to and from the site during the operational phase of the Scheme. There will be no significant impacts.
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Construction including traffic and transport noise and vibration

Paragraph 3.10.111	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.	Chapter 13: Transport and Access, ES Volume 1 [EN010143/APP/6.1] and Chapter 2: The Scheme, ES Volume 1 [EN010143/APP/6.1] state that during the operational phase, there will be a low volume of traffic to and from the
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Paragraph 3.10.112	Many solar farms will be sited in areas served by a minor road network. Public perception of the construction phase of solar farm 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.	Scheme, and there should be no requirement for HGV or AIL movements.
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During construction, it has been identified that with embedded mitigation measures in place there could be potentially significant adverse effects at Link 15 in terms of construction traffic increase during the hours of 06:00-07:00 and 19:00-20:00. Over the course of a 24-hour period, during construction (and decommissioning), it is anticipated that Link 15 will see a 6% increase in total traffic and a 0% increase in HGV traffic. This indicates that the

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overall impact on the road network will be low at this link location during the hours of 07:00-19:00.

These effects will be temporary, and only occur during the construction of the Scheme. There is not anticipated to be any significant impacts relating to transport during the operational phase of the Scheme.

A CTMP will be produced prior to the commencement of development, to be substantially in accordance with the **Framework CTMP** submitted with the Application in **Appendix 13-5, ES Volume 2 [EN010143/APP/6.2]**. This will minimise the impact of construction traffic on local communities by managing traffic using the local highway network, and where required/practicable implementing mitigation. The Framework CTMP defines information such as the routes that construction traffic must take, any timing restrictions in relation to the use of certain routes, and the penalties to contractors if the CTMP is not adhered to.

Paragraph 3.10.114

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.

Chapter 13: Transport and Access, ES Volume 1 [EN010143/APP/6.1] has assessed the various potential routes to the site, using a worst case scenario. Vehicle swept path analysis has been conducted on Heavy Good Vehicle (HGV) routes

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Paragraph 3.10.115

Where the exact location of the source of construction materials, such as crushed stone or concrete is not be known at the time of the application applicants should assess the worst-case impact of additional vehicles on the likely potential routes.

where pinch points have been noted using the largest vehicle assumed to utilise the roads (maximum legal articulated vehicle). Abnormal Indivisible Loads (AIL) vehicles have also been analysed along these routes to ensure safe journeys along the road network. The vehicle swept paths also demonstrate that construction vehicles will be able to turn in/out of the proposed site accesses.

A **Framework CTMP** is presented at **Appendix 13-5, ES Volume 2 [EN010143/APP/6.2]**. This will be updated to a detailed CTMP post-consent and prior to start of construction (secured through the DCO). The Framework CTMP defines information such as the routes that construction traffic must take, any timing restrictions in relation to the use of certain routes, and the penalties to contractors if the CTMP is not adhered to.

Paragraph 3.10.116

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

Chapter 13: Traffic and Transport, ES Volume 1 [EN010143/APP/6.1] provides a description of the baseline traffic conditions and states that there are no nearby road features which suggest that the transfer of materials poses a risk beyond that which would be expected on the general highway network (as agreed with the Planning Inspectorate).

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Paragraph 3.10.117

Where a cumulative impact is likely because multiple energy infrastructure developments are proposing to use a common port and/or access route and pass through the same towns and villages, applicants should include a cumulative transport assessment as part of the ES. This should consider the impacts of abnormal traffic movements relating to the project in question in combination with those from any other relevant development. Consultation with the relevant local highways authorities is likely to be necessary

No new transport infrastructure is therefore proposed as part of the Scheme. During the construction and decommissioning periods, traffic impacts will be managed in accordance with measures set out in the **Framework CTMP, ES Volume 2 [EN010143/APP/6.2]** and **Framework Decommissioning Environmental Management Plan [EN010143/APP/7.9]**.

Chapter 13: Traffic and Transport, ES Volume 1 [EN010143/APP/6.1] provides an assessment of the cumulative traffic impacts of the Scheme alongside other identified developments. This considered the impacts of abnormal traffic movements, and concludes that the impact of cumulative developments is minimal in terms of changing the 24-hour flows. It is therefore considered that the magnitude of impact at the road Link 15 remains unchanged from the Scheme's impacts in isolation (which are classed as significant), when cumulative developments are taken into consideration within 24-hour profile.

These effects will be temporary, and only occur during the construction of the Scheme. There is not anticipated to be any significant impacts relating to transport during the operational phase of the Scheme.

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The cumulative schemes for consideration have been agreed in consultation with East Riding Yorkshire Council and North Yorkshire Council. These schemes are set out within and are listed in **Appendix 5-1: Cumulative Schemes ES Volume 2 [EN010106/APP/6.2]**.

The Applicant has engaged with other developments, including Drax and Helios, to discuss how the projects would interact with each other.

Chapter 13: Traffic and Transport, ES Volume 1 [EN010143/APP/6.1] concludes that the future traffic baselines predicted for the 2025 assessment period have been calculated using TEMPro growth factors, which include an accurate forecast of local development growth. Therefore, the baseline includes cumulative growth and the cumulative effects are considered within the Assessment of Likely Impacts and Effects in section 13.7 of **Chapter 13: Traffic and Transport, ES Volume 1 [EN010143/APP/6.1]**.

Paragraph 3.10.118

The Defra Construction code of practice for the sustainable use of soils on construction sites provides guidance on ensuring that damage to soil during construction is mitigated and minimised. Mitigation measures focus on minimising damage to soil that remains in place, and minimising damage to soil being

Industry standard good practice measures for the handling and management of soil resources based upon guidance such as Defra's Code of Practice for the Sustainable Use of Soil on Development Sites are summarised in Section 15.8 Additional Mitigation, Enhancement and

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	<p>excavated and stockpiled. The measures aim to preserve soil health and soil structure to minimise soil carbon loss and maintain water infiltration and soil biodiversity. Mitigation measures for agricultural soils include use of green cover, multispecies cover crops - especially during the winter- minimising compaction and adding soil organic matter.</p>	<p>Monitoring of Chapter 15: Soils and Agricultural Land, ES Volume 1 [EN010143/APP/6.1], and further described in the Framework CEMP [EN010143/APP/7.7] and Framework SMP [EN010143/APP/7.10] submitted. The delivery of detailed CEMP and SMP prior to the commencement of works on site and implementation of the measures they describe will be secured through the DCO.</p>
<p>Paragraph 3.10.130</p>	<p>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</p>	<p>Chapter 13: Transport and Access, ES Volume 1 [EN010143/APP/6.1] and Chapter 2: The Scheme, ES Volume 1 [EN010143/APP/6.1] state that during the operational phase, there will be a low volume of traffic to and from the Scheme, and there should be no requirement for HGV or AIL movements.</p>
<p>Paragraph 3.10.131</p>	<p>Where the Secretary of State agrees that this is necessary, requirements could be imposed on development consent.</p>	<p>During construction, it has been identified that with embedded mitigation measures in place there could be potentially significant adverse effects at Link 15 in terms of construction traffic increase during the hours of 06:00-07:00 and 19:00-20:00. Over the course of a 24-hour period, during construction (and decommissioning), it is anticipated that Link 15 will see a 6% increase in total traffic and a 0% increase in HGV traffic. This indicates that the overall impact on the road network will be low at this link location during the hours of 07:00-19:00.</p>

**Draft NPS EN-3
Relevant Paragraph**

**Draft NPS EN-3
Detail**

**Draft NPS EN-3
Proposed Development compliance**

These effects will be temporary, and only occur during the construction of the Scheme. There is not anticipated to be any significant impacts relating to transport during the operational phase of the Scheme.

A CTMP will be produced prior to the commencement of development, to be substantially in accordance with the **Framework CTMP** submitted with the Application in **Appendix 13-5, ES Volume 2 [EN010143/APP/6.2]**.

The design of accesses at the site has taken into account the number and type of vehicles that will use them to avoid queuing on surrounding roads during construction. Parking will also be provided on site. The Applicant has also considered the routing of Abnormal Indivisible Load vehicles to the site to ensure safe, low impact routes are identified.

Paragraph 3.10.132

Where cumulative effects on the local road network or residential amenity are predicted from multiple solar farm developments, it may be appropriate for applicants for various projects to work together to ensure that the number of abnormal loads and deliveries are minimised, and the timings of deliveries are managed and coordinated to ensure that disruption to residents and other highway users is reasonably minimised.

The cumulative schemes for consideration have been agreed in consultation with East Riding Yorkshire Council and North Yorkshire Council. These schemes are set out within and are listed in **Appendix 5-1: Cumulative Schemes ES Volume 2 [EN010106/APP/6.2]**.

Draft NPS EN-3 Relevant Paragraph	Draft NPS EN-3 Detail	Draft NPS EN-3 Proposed Development compliance
Paragraph 3.10.133	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.	<p>Chapter 13: Traffic and Transport, ES Volume 1 [EN010143/APP/6.1] concludes that the impact of cumulative developments is minimal in terms of changing the 24-hour flows. It is therefore considered that the magnitude of impact at the road Link 15 remains unchanged from the Scheme’s impacts in isolation, when cumulative developments are taken into consideration within 24-hour profile.</p> <p>The Applicant has engaged with other developments, including Drax and Helios, to discuss how the projects would interact with each other.</p>
Paragraph 3.10.134	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.	The Applicant will continue to liaise with local highway authorities following submission of the Application and consent. Discussions have started on how to best manage the abnormal load deliveries and potential impacts on the local highway network. Areas where remedial work may be required following deliveries or where street furniture has been removed have been included in the Order limits. It is not currently considered necessary to agree planning obligations to secure highway works.
Paragraph 3.10.135	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	
Paragraph 3.10.152	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	<p>Chapter 13: Transport and Access, ES Volume 1 [EN010143/APP/6.1] states that during the</p>

**Draft NPS EN-3
Relevant Paragraph**

**Draft NPS EN-3
Detail**

**Draft NPS EN-3
Proposed Development compliance**

replace machine components, this may generate heavier commercial vehicle movements, but these are likely to be infrequent.

operational phase, there is not expected to be more than four visitors per day.

Panel replacements would be infrequent, totalling around one LGV per year. Every two years, the solar PV panels would be cleaned with water brought in 1 tonne trucks. A total of 220 trucks would be needed for cleaning over a 2-month period, meaning three to four trucks would be on-site each day at this time. Cleaning would occur at night-time meaning trucks would arrive to the Site at the end of the day.

If machine component replacements are required, these would be delivered in a transit van or similar. The inverters will likely need to be replaced every 15 years. A small number of transit van or similar vehicle HGV trips across the operational phase may be associated with panel removal/delivery and inverter removal/ delivery would be expected.

These low levels of operational traffic would remain constant for the 40-year operational lifetime of the Scheme.

Paragraph 3.10.153

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.

A preliminary assessment of the Schemes impact on noise and vibration is presented in **Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1]**. There is not anticipated to be any significant impact on noise and vibration

**Draft NPS EN-3
Relevant Paragraph**

**Draft NPS EN-3
Detail**

**Draft NPS EN-3
Proposed Development compliance**

from traffic and transport as a result of the Scheme.

1.6 Table 6 Draft National Policy Statement for Electricity Networks Infrastructure (EN-5) DRAFT

Draft NPS EN-5 Relevant Paragraph	Draft NPS EN-5 Detail	Draft NPS EN-5 Proposed Development compliance
Site selection and design		
Paragraph 2.2.8	There will usually be a degree of flexibility in the location of the development’s associated substations, and applicants should consider carefully their placement in the local landscape, as well as their design	The applicant wishes to retain flexibility regarding the design detail of certain components of the Scheme. The extent of flexibility required is described in Chapter 2: The Scheme, ES Volume 1 [EN010143/APP/6.1] and set out in the Design Principles Statement [EN010143/APP/7.4] and Design and Access Statement [EN010143/APP/7.3] .
Paragraph 2.2.9	In particular, the applicant should consider such characteristics as the local topography, the possibilities for screening of the infrastructure and/or other options to mitigate any impacts. (See Section 2.10 below and Section 5.10 in EN-1.)	As detailed in the Design and Access Statement [EN010143/APP/7.3] and Section 6.3 of the Planning Statement [EN010143/APP/7.2] , the Scheme has been informed by a detailed and sensitive iterative design process. This has involved taking account of the context and features of the land within the Order limits, sensitive receptors, information from environmental surveys and feedback from stakeholders. The design also takes into account constraints and opportunities in order to develop a good design that balances the need to maximise renewable energy generation from the Scheme along with the minimisation of potential impacts or provision of mitigation and environmental enhancements where practicable.

The key focus of Objective 2 of the **Design and Access Statement [EN010143/APP/7.3]** is to ensure the Scheme responds sensitively to the landscape. Landscape was a key factor in the layout and design of the Scheme. The design has evolved to reduce the impacts on landscape features including the incorporation of buffers from woodland/hedgerows, PRoW and water courses.

The substations were originally located in Solar PV Areas 3a and 1c. Following statutory consultation, both substations are now located within area 1c. The location of the substations was informed by flood mapping as detailed in **Chapter 3: Alternatives and Design Evolution [EN010143/APP/6.1]**. The location of the substations was changed in direct response to flood reliance considerations as well as responding to consultation responses.

Climate Change adaption and resilience

Paragraph 2.3.1	Section 4.9 of EN-1 sets out the generic considerations that applicants and the Secretary of State should take into account in order to ensure that electricity networks infrastructure is resilient to the effects of climate change.	As outlined in Chapter 6: Climate Change of the ES [EN010143/APP/6.1] , the effects of climate change have been taken into account in the design of the Scheme, and when considering how it will be constructed, operated and decommissioned. This includes:
Paragraph 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:	<ol style="list-style-type: none">Adopting the Considerate Constructors Scheme (CCS)Encouraging to all construction staff to the use of lower carbon modes of transport by

- 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

identifying and communicating local bus and rail connections and pedestrian and cycle access routes to/from the Scheme and providing appropriate facilities for the safe storage of cycles;

- c. Implementing a **Framework CTMP (Appendix 13-5, ES Volume 2 [EN010143/APP/6.2])** to reduce the volume of construction staff and employee trips to the Site;
- d. Switching vehicles and plant off when not in use and ensuring construction vehicles conform to European Union (EU) vehicle emissions standards for the types of plant and vehicles to be used;
- e. Where practicable, maximise the use of alternative materials with lower embodied carbon such as locally sourced products and materials with a higher recycled content;
- f. Named person(s) – likely the Safety, Health and Environment Manager/ Ecological Clerk of Works (ECoW) – to monitor weather forecasts and receive of Environment Agency flood alerts to allow works to be planned and carried out accordingly to manage extreme weather conditions, such as storms and flooding; and
- g. Health and safety plans developed for construction activities will be required to account for potential climate change impacts on workers, such as flooding and heatwaves. To include measures such as toolbox talks on

training on dangers of extreme weather conditions.

- h. Use of motion detection security lighting to avoid permanent lighting and reduce energy demand of the Scheme;
- i. Establish, monitor, and manage landscape and ecology mitigation and enhancement (BNG) measures embedded in the design, secured through the **Framework LEMP [EN010143/APP/7.14]**, which has been submitted as part of the DCO application;

Further climate change resilience measures embedded within the Scheme, particularly in relation to flood risk are included in the **Framework CEMP [EN010143/APP/7.7]**. The specific flood risk impacts and associated mitigation measures are discussed in more detail in Chapter 9: Flood Risk, Drainage and Surface Water, ES Volume 1 [EN010143/APP/6.2].

In addition, adaptation measures to reduce the effect of projected temperature increases on electrical equipment over the course of the Scheme's design life have been taken into account. PV inverters will have a cooling system installed to control the temperature and allow the inverters to operate efficiently in warmer conditions. The PV modules and transformers have a wide range of acceptable operation temperatures, and it has been determined that

increasing temperatures will not adversely affect their operation.

A Framework CEMP [EN010143/APP/7.7], Framework OEMP and Framework DEMP will be developed into a detailed CEMP, OEMP and DEMP prior to the construction phase commences as a means to secure the embedded mitigation measures mentioned above.

Paragraph 2.3.3

Section 4.9 of EN-1 advises that the resilience of the project to the effects of climate change must be assessed in the Environmental Statement (ES) accompanying an application. For example, future increased risk of flooding would be covered in any flood risk assessment (see Sections 5.8 in EN-1).

Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1] assesses the Climate Change Impacts of the Proposed Development including a Climate Change Risk Assessment and In-Combination Climate Change Impact Assessment.

The specific flood risk impacts and associated mitigation measures are discussed in more detail in **Chapter 9: Flood Risk, Drainage and Surface Water, ES Volume 1 [EN010143/APP/6.2]** and the **FRA (Appendix 9-3, ES Volume 2 [EN01043/APP/6.2])**.

Paragraph 2.8.3

The Secretary of State should also take into account that Transmission Owners (TOs) and Distribution Network Operators (DNOs) are required under Section 9 of the Electricity Act 1989 to bring forward efficient and economical proposals in terms of network design.

The Applicant has secured a connection to the National Grid via a new below ground grid connection cable located within the Grid Connection Corridor. This will connect the new on-site Substation with the existing National Grid Drax Substation. Further details are included in the **Grid Connection Statement [EN010143/APP/7.5]**.

Paragraph 2.8.4

TOs and DNOs are also required to facilitate competition in the generation and supply of electricity, and electricity distributors have a statutory duty to provide a connection where requested.

Paragraph 2.9.37	Audible noise effects can also arise from substation equipment such as transformers, quadrature boosters and mechanically switched capacitors.	Chapter 11: Noise & Vibration, ES Volume 1 [EN010143/APP/6.1] has assessed the impacts of all aspects of the Scheme including substations in accordance with this policy. The chapter concludes that there will not be any significant impact on noise from substations as a result of the Scheme. The Scheme has implemented 250 m buffers from residential receptors to noise generating equipment, with a 350 m buffer agreed to protect a sensitive receptor, as set out in the Outline Design Principles Statement [EN010143/APP/7.4] .
Paragraph 2.9.38	Transformers are installed at many substations, and generate low frequency hum. Whether the noise can be heard outside a substation depends on a number of factors, including transformer type and the level of noise attenuation present (either engineered intentionally or provided by other structures).	
Paragraph 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.	The BNG report includes high-level management prescriptions for habitats to achieve their target condition scores, which will feed into habitat management and monitoring plans. Long-term management of the Schemes landscape mitigation and screening is set out within the Framework LEMP, ES Volume 7 [EN010143/APP/7.14] .

Electric and Magnetic Fields

Paragraph 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	The Scheme design will ensure compliance with Electricity Safety, Quality and Continuity Regulations 2002, however this is not specifically addressed within the ES. The Scheme has considered a number of up to date legislation, policy and guidance as set out in Section 16.8 of Chapter 16: Other
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	<p>accordance with the Code of Practice to minimise EMFs; and</p> <p>any new advice emerging from the Department of Health and Social Care relating to government policy for EMF exposure guidelines</p>	<p>Environmental Topics, ES Volume 1 [EN010143/APP/6.1]</p> <p>As set out in Chapter 2: The Scheme ES Volume 1 [EN010143/APP/6.1], it has been confirmed that there are no overhead electricity cables used or constructed as part of the Scheme.</p> <p>Relevant emerging policy is considered within the assessment at ES.</p>
Paragraph 2.11.12	<p>Undergrounding of a line would reduce the level of EMFs experienced, but high magnetic field levels may still occur immediately above the cable. It is the government's policy that power lines should not be undergrounded solely for the purpose of reducing exposure to EMFs</p>	<p>The provision of underground cables as part of the Scheme was mainly due to the need to minimise the effects on landscape and visual, and noise.</p> <p>An assessment of Electric and Electro Magnetic Fields is set out in Chapter 16: Other Environmental Topics, ES Volume 1 [EN010143/APP/6.1]. It concludes that no significant effects to residential receptors are predicted to occur and no significant effects to users of PRoW are predicted to occur.</p>
Paragraph 2.11.13	<p>In order to avoid unacceptable adverse impacts of EMFs from electricity network infrastructure on aviation, the Secretary of State will take account of statutory technical safeguarding zones defined in accordance with Planning Circular 01/0322, or any successor, when considering recommendations for DCO applications. More detail on this issue can be found in Section 5.5 of EN-1.</p>	
Paragraph 2.11.14	<p>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</p>	
Paragraph 2.14.2	<p>In the assessments of their designs, applicants should demonstrate:</p>	<p>As detailed in the Design and Access Statement [EN010143/APP/7.3] and Section 6.3 of the Planning Statement [EN010143/APP/7.2], the</p>

how environmental, community and other impacts have been considered and how adverse impacts have followed the mitigation hierarchy i.e. avoidance, reduction and mitigation of adverse impacts through good design; and

how enhancements to the environment post construction will be achieved including demonstrating consideration of how proposals can contribute towards biodiversity net gain (as set out in Section 4.5 of EN-1 and the Environment Act 2021), as well as wider environmental improvements in line with the Environmental Improvement Plan and environmental targets (paragraph 4.2.29 of EN-1).

In addition, all applicants are encouraged to demonstrate how the construction planning for the proposals has been coordinated with that for other similar projects in the area on a similar timeline.

Scheme has been informed by a detailed and sensitive iterative design process. This has involved taking account of the context and features of the land within the Order limits, sensitive receptors, information from environmental surveys and feedback from stakeholders. The design also takes into account constraints and opportunities in order to develop a good design that balances the need to maximise renewable energy generation from the Scheme along with the minimisation of potential impacts or provision of mitigation and environmental enhancements where practicable. The design process and basis of design decisions are set out in **Chapter 3: Alternatives and Design Evolution [EN010143/APP/6.1], Volume 1 of the ES [EN010142/APP/6.1]** and the **Design and Access Statement [EN010142/APP/7.3]**.

Design development has sought to first avoid, and then mitigate potential effects, in line with the mitigation hierarchy. Embedded mitigation measures and additional mitigation requirements are included in **Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1]**, and the **Framework CEMP [EN010143/APP/7.7]** which aim to avoid significant harm to important ecological features. The requirement for further mitigation is also identified.

The Ecology chapter of the ES **Chapter 8: Ecology, ES Volume 6 [EN010143/APP/6.1]** provides information on how the project has taken

advantage of opportunities to conserve and enhance biodiversity and described how they will be achieved post construction. This is also set out in the **Framework LEMP [EN010143/APP/7.14]**.

The Applicant is committed to exceeding the Government's 10% target for biodiversity net gain as set out in the Environment Act 2021. A **Biodiversity Net Gain (BNG) report [EN010143/APP/6.2]**, Natural England's Biodiversity Metric 4.0, has been produced for the DCO Application. This report demonstrates that the Scheme has the potential to deliver significant biodiversity net gain on the Site, with 80% gain predicted for habitat biodiversity units.

Appendix B Local Policy Accordance Tables

Appendix B Local Planning Policy Accordance Tables

1.1 Table 1: East Riding Local Plan 2012-2029 Strategy Document 2016

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
East Riding Local Plan 2012-2029 Strategy Document 2016	Policy S1 Presumption in favour of sustainable development	<p>Development proposals</p> <p>When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the East Riding of Yorkshire.</p> <p>The Local Plan should be read as a whole. Planning applications that accord with the policies in the Local Plan will be approved without delay, unless material considerations indicate otherwise - taking into account whether:</p> <ol style="list-style-type: none"> 1. Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or 2. Specific policies in that Framework indicate that development should be restricted. 	<p>The environmental impacts of the Scheme have been assessed as reported in the ES [EN0101043/APP/6.1-6.4] and are discussed in this Planning Statement [EN010143/APP/7.2]. Overall, with appropriate mitigation implemented, the Scheme is expected to have limited and localised residual significant adverse effects during its 40 year operation when considered relative to the large scale nature of the Scheme. These effects are therefore considered to be outweighed by the significant national benefits that the Scheme will provide. As explained further in this section of the Planning Statement [EN010143/APP/7.2], there are no specific and relevant policies set out in the relevant NPSs which clearly indicate that consent should be refused.</p> <p>In summary, the Scheme has a vital role to play in the UK's urgent response to tackle climate change. The Scheme is critical and will make a timely contribution to the decarbonisation, affordability and security of UK's energy supply. Any potential residual significant environmental effects are outweighed by the benefits of the Scheme, the contribution towards meeting the energy need being one of these key benefits. There</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
East Riding Local Plan 2012-2029 Strategy Document 2016	Policy S2 Addressing climate change	<p>The Local Plan and development decisions will support a reduction in greenhouse gas emissions and adaptation to the expected impacts of climate change. Table 1 sets out how this will be achieved.</p> <ul style="list-style-type: none"> • Direct most new development to areas where there are services, facilities, homes and jobs, which reduces the need to travel and where it can be served by sustainable modes of transport • Promote the most efficient use of land, mineral, energy and water resources • Support the re-use of the area's building stock and previously developed land • Build at higher densities where appropriate and supporting opportunities for mixed use development 	<p>are no policies which clearly indicate that consent should be refused.</p> <p>The Scheme is therefore in compliance with the relevant national and local policies relating to the need for, and provision of, renewable energy infrastructure. Helping meet this established urgent need should weigh substantially in favour of the DCO being granted.</p> <p>The Statement of Need [EN010143/APP/7.1] sets out that the Scheme would make a direct contribution to the provision of low carbon generation capacity that is urgently required in order to meet the Government's objectives and commitments for the development of a secure, affordable, and low carbon energy system. This is in accordance with Part 8 of this policy.</p> <p>The Scheme is located in an area that is served by a network of roads, rain and PRoW. The Applicant will endeavour to encourage all construction staff to use lower carbon modes of transport by identifying and communicating local bus and rail connections and pedestrian and cycle access routes to/from the Scheme and providing appropriate facilities for the safe storage of cycles, as set out in Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1].</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<ul style="list-style-type: none"> • Promote sustainable modes of transport and well-connected places • Promote the creation of economic clusters for the renewable and low carbon energy sector • Encourage high standards of sustainable design and construction which involve the prudent and efficient use of natural resources and built-in resilience to the impacts of climate change • Promote renewable and decentralised energy generation in appropriate locations • Promote proposals that protect, enhance and link habitat networks to allow biodiversity to adapt to climate change • Conserve, enhance and link green infrastructure networks to provide flood management, shading for urban areas and natural air conditioning • Promote development away from areas of high flood risk, as far as possible • Support sustainable flood management proposals 	<p>The Scheme would utilise existing farm accesses as far as practicable and would utilise existing modern agricultural buildings at Johnson’s Farm for storage.</p> <p>The Scheme would result in 401 net jobs per annum during construction and would contribute to the development of skills needed for the UK’s transition to Net Zero by 2050 and described within the Net Zero Strategy: Building Back Greener. It is also estimated that the construction of the Scheme would contribute approximately £22.5 million to the national economy, of which £10.1m would likely be within the local area.</p> <p>As detailed in the Design and Access Statement [EN010143/APP/7.3] and Section 6 of the Planning Statement [EN010143/APP/7.2], the Scheme has been informed by a detailed and sensitive iterative design process. This has involved taking account of the context and features of the land within the Order limits, sensitive receptors, information from environmental surveys and feedback from stakeholders. The design also takes into account constraints and opportunities in order to develop a good design that balances the need to maximise renewable energy generation from the Scheme along with the minimisation of potential impacts or provision</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<ul style="list-style-type: none">• Support the implementation of the most recent Shoreline Management Plan• Manage development in coastal areas and facilitate the re-location/roll back of development from areas between Barmston and Spurn Point	<p>of mitigation and environmental enhancements where practicable. The design process and basis of design decisions are set out in Chapter 3: Alternatives and Design Evolution [EN010143/APP/6.1], Volume 1 of the ES [EN010142/APP/6.1] and the Design and Access Statement [EN010142/APP/7.3].</p> <p>The Scheme's embedded mitigation measures have ensured that climate change resilience is built into the design. The Applicant is committed to exceeding the Government's 10% target for biodiversity net gain as set out in the Environment Act 2021. A Biodiversity Net Gain (BNG) report [EN010143/APP/6.2], Natural England's Biodiversity Metric 4.0, has been produced for the DCO Application. This report demonstrates that the Scheme has the potential to deliver significant biodiversity net gain on the Site, with 80% gain predicted for habitat biodiversity units. As part of these gains, the Scheme will conserve, enhance and link habitat networks.</p> <p>Green infrastructure includes provision of species rich grassland, woodland and hedgerow habitats throughout the Site, as mitigation but which will also enhance ecological connectivity and habitat.</p> <p>The Scheme would also include the enhancement of the current PRow network, through the provision of</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
			<p>two new Permissive Paths, as shown on Figure 2-3, ES Volume 3 [EN010143/APP/6.3].</p> <p>The FRA [EN010143/APP/6.2], and Sequential Test Report (Annex C to FRA) demonstrates that the Sequential Test has been met for the Solar PV Site, which is predominantly located in Flood Zone 1, with small parts located in Flood Zone 2 and 3. It also demonstrates that the Sequential and Exception Tests are met for the Interconnecting Cable Corridor, Grid Connection Corridor and part of the Solar PV Site, which is located within Flood Zone 3.</p> <p>A Framework Surface Water Drainage Strategy, Appendix 9-4, ES Volume 2 [EN010143/APP/6.2] is submitted, which sets out the proposed strategy for surface water and drainage, which will be secured by requirements of the DCO. Mitigation measures such as the use of localised SuDS, such as swales and infiltration trenches, will be used to control runoff if required.</p> <p>The Scheme can be constructed, operated and decommissioned without preventing safeguarded mineral resources from being extracted in the future.</p>
<p>East Riding Local Plan 2012-2029</p>	<p>Policy S3: Focusing development</p>	<p>A. New development will be supported where it is focused within the following locations: 1. The defined Settlement Network which consists of land within the development limits of:</p>	<p>Due to the scale of the land required to deliver the substantial renewable energy generation capacity that the Scheme will provide, and the need to be in sufficient proximity of the connection point to</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
Strategy Document 2016		<p>i. The Major Haltemprice Settlements – those settlements in the East Riding immediately to the west of the City of Hull – Anlaby, Cottingham, Hessle, Kirk Ella and Willerby;</p> <p>ii. Principal Towns – Beverley(3), Bridlington, Driffield and Goole(4);</p> <p>iii. Towns – Elloughton-cum-Brough(5), Hedon(6), Hornsea, Howden, Market Weighton, Pocklington and Withernsea; iv. Rural Service Centres – Aldbrough, Beeford, Bubwith, Gilberdyke/Newport, Holme on Spalding Moor, Hutton Cranswick, Keyingham, Kilham, Leven, Middleton on the Wolds, Patrington, Snaith, Stamford Bridge and Wetwang; and v. Primary Villages – Bilton, Brandesburton, Cherry Burton, Dunswell, Easington, Eastrington, Flamborough, Leconfield, Melbourne, Nafferton, North Cave, North Ferriby, Preston, Rawcliffe, Roos, Skirlaugh, South Cave, Swanland, Thorngumbald, Tickton, Walkington, Wawne, Wilberfoss and Woodmansey.</p> <p>2. Key Employment Sites along the East-West Multi-Modal Transport Corridor – Hedon Haven, Humber Bridgehead (Hessle), Melton and Capitol Park (Goole). The Major Haltemprice Settlements, Principal Towns and Towns will be the main focus of growth in the East Riding with the Key Employment Sites providing a main focus for employment</p>	<p>the National Electricity Transmission System (NETS), the Scheme could not be located within the defined Settlement Network.</p> <p>As explained in the Statement of Need [EN010143/APP/7.1] and Section 4 of the Planning Statement [EN010143/APP/7.2] explain that the Scheme is a substantial infrastructure asset, capable of delivering large amounts of secure, affordable, low-carbon electricity to local and national networks.</p> <p>The contribution the Scheme would make to meeting the established urgent need for renewable energy generation infrastructure warrants its location in the countryside. Policy S4 outlines compliance with this policy.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>development. The Rural Service Centres and Primary Villages will provide for more limited development in rural areas complemented by existing employment sites. New development will be encouraged where it involves the re-use of suitable previously developed land.</p> <p>Rural Service Centres and Primary Villages F. In order to sustain the overall vitality of rural areas, development to meet local community needs and sustainable economic growth will be supported in Rural Service Centres and Primary Villages, complementing the roles of Towns in meeting some of the basic needs outside of the Major Haltemprice Settlements and Principal Towns.</p> <p>G. To ensure the delivery of the overall spatial approach, the following forms of development will be supported in Rural Service Centres and Primary Villages:</p> <ol style="list-style-type: none"> 1. Residential development, including affordable housing, commensurate with the scale, role and character of the village. 2. New and/or enhanced local services and facilities. 3. Economic development appropriate to the scale of the village. 	
East Riding	Policy S4 Supporting	A. Outside of the settlements listed in Policy S3, development will be supported to help maintain the	The contribution the Scheme would make to meeting the established urgent need for renewable energy

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
Local Plan 2012-2029 Strategy Document 2016	development in Villages and the Countryside	<p>vibrancy of Villages (listed in Appendix B) and the Countryside where it:</p> <ol style="list-style-type: none"> 1. Is of an appropriate scale to its location taking into account the need to support sustainable patterns of development; 2. Encourages the re-use of previously developed land where appropriate; and 3. Does not involve a significant loss of best and most versatile agricultural land. <p>Development in Villages and the Countryside should also accord with the specific provisions of parts B or C of this policy.</p> <p>Villages</p> <p>B. Within the development limits of Villages, as set out on the Policies Map, the following forms of development will be supported where it does not detract from the character and appearance of the village:</p> <ol style="list-style-type: none"> 1. New housing, usually comprising a single dwelling; 2. Affordable housing for local people; 3. New and/or enhanced local services and facilities; and 4. Economic development. <p>Countryside</p>	<p>generation infrastructure warrants its location in the countryside.</p> <p>The Scheme has been informed by a detailed and sensitive iterative design process. This has involved taking account of the context and features of the land within the Order limits, sensitive receptors, information from environmental surveys and feedback from stakeholders. The design also takes into account constraints and opportunities in order to develop a good design that balances the need to maximise renewable energy generation from the Scheme along with the minimisation of potential impacts or provision of mitigation and environmental enhancements where practicable. The design process and basis of design decisions are set out in Chapter 3: Alternatives and Design Evolution [EN010143/APP/6.1], Volume 1 of the ES [EN010142/APP/6.1] and the Design and Access Statement [EN010142/APP/7.3]. It is therefore considered that the Scheme is of an appropriate scale to its location.</p> <p>Agricultural land quality was a key consideration of the site selection process as set out in Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1]. The Scheme is located mostly on lower quality agricultural land, with the majority of</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>C. Outside of a development limit land will be regarded as the Countryside and the following forms of development supported, where proposals respect the intrinsic character of their surroundings:</p> <ol style="list-style-type: none"> 1. Conversion of buildings for economic development (including work-live units), tourism or community uses. Conversions for new housing will be supported where the preservation of the building would enhance the immediate setting and where it: <ol style="list-style-type: none"> i. would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of a heritage asset; or ii. would re-use a redundant or disused building without significant alteration or significant extension. 2. Replacement dwellings; 3. New dwellings of exceptional quality or of truly outstanding innovative design; 4. Affordable housing for local people; 5. Agricultural, forestry or other rural-based occupational dwellings subject to demonstrating an essential need. Such dwellings will be subject to an agricultural occupancy condition; 6. Employment uses in accordance with Policy EC1; 	<p>the Scheme being on land not classed as Best and Most Versatile (BMV). For the Solar PV Site, 92% of the land used is non BMV land.</p> <p>The Scheme is not located within the development limits of any villages as set out in this policy.</p> <p>The Scheme will be located in the Countryside. The Scheme is considered to be regarded as a supported development within the countryside as it would be a development for 'Energy development and associated infrastructure' and would fall under exception 9, Part C of this policy.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
<p>7. Agricultural, horticultural and forestry uses; 8. New and enhanced infrastructure; 9. Energy development and associated infrastructure; 10. Development to support existing military defence operations; and 11. Sports, equine, recreation, community facilities and tourism development.</p>			
<p>East Riding Local Plan 2012-2029 Strategy Document 2016</p>	<p>Policy S8 Connecting people and places</p>	<p>A. New development should ensure that people and places are well connected. B. The overall role and function of the Strategic Transport Network, as shown in Figure 7, will be protected and/or enhanced, having regard to the investment priorities, policies, and proposals of the Local Transport Plan and other related strategies. C. Transport schemes that improve the overall capacity and coverage of the transport network will be supported. Where appropriate land will be safeguarded for these schemes in the Allocations Document, Bridlington Town Centre Area Action Plan, or a Neighbourhood Development Plan. D. The role and function of the East-West Multi-Modal Transport Corridor, which serves the transport needs of Key Employment Sites, will be protected and/or enhanced, where appropriate, to enable the efficient and integrated movement of freight by, and between, different transport modes.</p>	<p>The Scheme is located in an area that is served by a network of roads, rail and PRow.</p> <p>The Statement of Need [EN010143/APP/7.1] and Section 5 of the Planning Statement [EN010143/APP/7.2] explain that the Scheme is a solar farm, capable of delivering large amounts of secure, affordable, low-carbon electricity to local and national networks, and is therefore not a transport scheme.</p> <p>Chapter 13: Transport and Access, ES Volume 1 [EN010143/APP/6.1] sets out the effects of the Scheme on the local and regional transport network. Appendix 13-4, ES Volume 2 [EN010143/APP/6.1] contains a transport Assessment, prepared in accordance with the appropriate guidance which includes the Travel Plans, TAs and Transport Statements in Decision Taking (2014). The Applicant has consulted with the relevant Highways Authorities</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>E. Roadside facilities essential to support the safety and welfare of motorists will be supported, where they are of an appropriate scale and meet an identified need.</p> <p>F. Existing and future port operations at Goole within the Operational Port Area, as shown on the Policies Map, will be safeguarded from development which would conflict with this use.</p> <p>G. Existing wharf and rail facilities on the Aire and Calder Canal, River Ouse, Humber Estuary, and elsewhere will be safeguarded to maintain a choice of sustainable transport modes.</p> <p>H. Existing and disused public transport, cycling and footpath networks and facilities, including Public Rights of Way, will be enhanced and/or protected, particularly within and linking to the Major Haltemprice Settlements, Principal Towns, and Towns.</p> <p>I. Proposals which facilitate integration between different modes of travel, especially walking, cycling and public transport, will be encouraged.</p> <p>J. Initiatives that improve accessibility in rural areas will be supported, through working with the Local Transport Plan and other strategies and programmes, including the community transport sector.</p>	<p>and National Highways regarding the assessment and mitigation. Comments from these stakeholders are presented in Section 13.3 of Chapter 13: Transport and Access, ES Volume 1 [EN010143/APP/6.1].</p> <p>The Scheme has been designed to have minimal impact on PRow. As set out in the Design and Access Statement [EN010143/APP/7.3] the Scheme design maintains access to all existing PRow within the Order limits, with no permanent diversions or closures.</p> <p>It also ensures a minimum width for PRow, as well as for the corridor in which they will be provided (between Scheme infrastructure). In all cases the PRow will see perimeter fencing being installed a minimum distance from the centreline of the PRow of 20 m to either side (creating a 40 m corridor) if the solar infrastructure is on both sides of the PRow, and of 15 m if solar infrastructure lies to one side only. This will help avoid the perception of being channelled into narrow passages between solar PV panels;</p> <p>The design proposes perimeters to be planted with species-rich grassland or flower rich grassland (Solar PV area 2f) and clumps of low-growing native woodland edge to break up channelled views created</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement
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Compliance with policy

by the proposed Solar PV fencing, and would provide amenity for walkers, cyclists and horse-riders. It would also create new native hedgerows with trees along the Howden 20 Route and PRow BUBWF10.

The Scheme includes the enhancement of the current PRow network, with the implementation of Permissive Paths, as shown on **Figure 2-3, ES Volume 3 [EN010143/APP/6.3]**.

The first proposed permissive path is a continuation of Bridleway SPALB08 which currently terminates at Johnson's Farm (the site of the Operations and Maintenance Hub). This is proposed to also allowing travel on horses in response to feedback from the East Riding of Yorkshire Council's PRow team. The proposed permissive path runs northwards for approximately 340 m until it connects with the second proposed permissive path.

The second proposed permissive path runs eastwards from footpath SPALF14, connecting with the first permissive path and continuing eastwards to the edge of the grassland habitat created in the east of Solar PV Area 1e. The path would be approximately 1.4 km in length. From discussions with East Riding of Yorkshire Council PRow Team it is proposed that the section from SPALF14 to the

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
			<p>connection with the first permissive path will allow travel on horses.</p> <p>The Applicant will also endeavour to encourage all construction staff to use lower carbon modes of transport by identifying and communicating local bus and rail connections and pedestrian and cycle access routes to/from the Scheme and providing appropriate facilities for the safe storage of cycles, as set out in Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1].</p>
<p>East Riding Local Plan 2012-2029 Strategy Document 2016</p>	<p>Policy EC1 Supporting the growth and diversification of the East Riding economy</p>	<p>A. To strengthen and encourage growth of the East Riding economy, employment development will be supported where the proposal is of a scale suitable to the location. Proposals will be encouraged where they:</p> <ol style="list-style-type: none"> 1. Contribute to the modernisation, development and diversification of the local economy; 2. Develop and strengthen the East Riding's key employment sectors and clusters including: renewable energy; manufacturing and engineering (including chemicals); agriculture/ food and drink; tourism; ports and logistics; transport equipment; digital and creative industries; finance and business services; construction; public administration, defence, health and education; and retail; 	<p>The Scheme is not specifically employment development, however it will generate employment as part of its construction.</p> <p>The Scheme would result in 401 net jobs per annum during construction and would contribute to the development of skills needed for the UK's transition to Net Zero by 2050 and described within the Net Zero Strategy: Building Back Greener. It is also estimated that the construction of the Scheme would contribute approximately £22.5 million to the national economy, of which £10.1m would likely be within the local area.</p> <p>A Framework Skills, Supply Chain and Employment Plan (FSSCEP) [EN010143/APP/7.15]</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>3. Contribute towards reducing social exclusion and provide employment opportunities in deprived areas;</p> <p>4. Contribute to the improvement in the physical appearance of an existing employment site or premises; or</p> <p>5. Support the vitality and viability of a Town or District Centre.</p> <p>B. Key Employment Sites will be safeguarded from alternative uses.</p> <p>C. There will be a presumption in favour of retaining all other employment land and premises. Proposals involving the loss of land or premises from employment use will be supported where:</p> <p>1. There is no longer a need, or it is not viable, for that or any other employment use on the site, which has been demonstrated by an up-to-date employment land review or through a comprehensive marketing exercise;</p> <p>2. The use of the site for employment purposes is not in conformity with adjoining land uses and could give rise to complaint; or</p> <p>3. The development would make a significant contribution towards the wider regeneration of the locality and would support other planning priorities set out in the Plan.</p> <p>D. Outside of development limits employment development will be supported where it is of an</p>	<p>has been prepared to maximise and pro-actively expand the economic benefits of the Scheme for the local community. The purpose of this is to promote employment and training opportunities associated with the construction and operation of the Scheme. This would include There will be a Requirement in the DCO for the FSSCEP to be developed into a full SSCE plan once the DCO is granted.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>appropriate scale to its location and respects the character of the surrounding landscape. Proposals should:</p> <ol style="list-style-type: none">1. Be within or adjacent to an existing industrial estate or business park;2. Involve the expansion of an existing business;3. Involve the conversion of an existing building; or4. Have a functional need to be in the particular location which cannot be met on either a nearby allocation, or on a site which satisfies any of the above criteria. <p>E. Substantial proposals for employment development that cannot be accommodated on allocated sites will be supported where the:</p> <ol style="list-style-type: none">1. Development is for a specified end user and proven substantial employment benefits would arise; and2. Identified site provides the most appropriate location for the proposal, with priority given to locations that are adjacent to existing employment sites and in locations well-related to the Major Haltemprice Settlements, Principal Towns or the East-West Multi-Modal Transport Corridor. <p>F. Farm diversification schemes will be encouraged providing they are of an appropriate scale to their location, respect the character of the surrounding landscape, re-use existing buildings</p>	

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>where possible and any new buildings are well related to the built form and scale of the farm. G. Employment allocations will be set out in the Allocations Document or a Neighbourhood Development Plan.</p>	
<p>East Riding Local Plan 2012-2029 Strategy Document 2016</p>	<p>Policy EC4 Enhancing sustainable transport</p>	<p>A. In order to increase overall accessibility, minimise congestion and improve safety, new development will be supported where it is accessible, or can be made accessible, by sustainable modes of transport and addresses its likely transport impact. Development proposals should:</p> <ol style="list-style-type: none"> 1. Produce and agree a transport assessment and travel plan, where a significant transport impact is likely; 2. Support and encourage sustainable travel options which may include public transport, electric and ultra low emission vehicles, car sharing, cycling and walking; particularly in the Major Haltemprice Settlements, Principal Towns, and Towns; and 3. Bring forward other necessary transport infrastructure to accommodate expected movement to and from the development. <p>B. Developments generating significant freight movement located along the East-West Multi-Modal Transport Corridor should capitalise on the</p>	<p>Chapter 13: Transport and Access, ES Volume 1 [EN010143/APP/6.1] sets out the effects of the Scheme on the local and regional transport network. Appendix 13-4, ES Volume 2 [EN010143/APP/6.1] contains a Transport Assessment, prepared in accordance with the appropriate guidance which includes the Travel Plans, TAs and Transport Statements in Decision Taking (2014). The Applicant has consulted with the relevant Highways Authorities and National Highways regarding the assessment and mitigation. Comments from these stakeholders are presented in Section 13.3 of Chapter 13: Transport and Access, ES Volume 1 [EN010143/APP/6.1].</p> <p>During construction, it has been identified that with embedded mitigation measures in place there could be potentially significant adverse effects at Link 15 in terms of construction traffic increase during the hours of 06:00-07:00 and 19:00-20:00. Over the course of a 24-hour period, during construction (and decommissioning), it is anticipated that Link 15 will see a 6% increase in total traffic and a 0% increase</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>opportunities for transferring and transporting freight by means other than road.</p> <p>C. The number of parking spaces for all new development should reflect:</p> <ol style="list-style-type: none">1. The level of public transport accessibility;2. The expected car usage on the site; and3. The most efficient use of space available and promotion of good design.	<p>in HGV traffic. This indicates that the overall impact on the road network will be low at this link location during the hours of 07:00-19:00.</p> <p>These effects will be temporary, and only occur during the construction of the Scheme. Chapter 13: Transport and Access, ES Volume 1 [EN010143/APP/6.1] states that there will be no significant effects as a result of the Scheme on transport and access during operation.</p> <p>The Scheme is located in an area that is served by a network of roads, rail and PRow. The Applicant will endeavour to encourage all construction staff to the use of lower carbon modes of transport by identifying and communicating local bus and rail connections and pedestrian and cycle access routes to/from the Scheme and providing appropriate facilities for the safe storage of cycles, as set out in Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1].</p> <p>The Scheme would also include the enhancement of the current PRow network, with the implementation of Permissive Paths, as shown on Figure 2-3, ES Volume 3 [EN010143/APP/6.3].</p> <p>The first proposed permissive path is a continuation of Bridleway SPALB08 which currently terminates at</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
			<p>Johnson's Farm (the site of the Operations and Maintenance Hub). This is proposed to also allowing travel on horses in response to feedback from the East Riding of Yorkshire Council's PRow team. The proposed permissive path runs northwards for approximately 340 m until it connects with the second proposed permissive path.</p> <p>The second proposed permissive path runs eastwards from footpath SPALF14, connecting with the first permissive path and continuing eastwards to the edge of the grassland habitat created in the east of Solar PV Area 1e. The path would be approximately 1.4 km in length. From discussions with East Riding of Yorkshire Council PRow Team it is proposed that the section from SPALF14 to the connection with the first permissive path will allow travel on horses.</p> <p>Car parking would be provided on site for construction staff and would not have any impact on the local road network.</p>
<p>East Riding Local Plan 2012-2029 Strategy</p>	<p>Policy EC5 Supporting the energy sector</p>	<p>A. Proposals for the development of the energy sector, excluding wind energy but including the other types of development listed in Table 7, will be supported where any significant adverse impacts are addressed satisfactorily and the residual harm is outweighed by the wider benefits of the</p>	<p>The Scheme will comprise the construction, operation (including maintenance), and decommissioning of a solar photovoltaic (PV) electricity generating facility with a total capacity exceeding 50 megawatts (MW) and export connection to the national grid, at National Grid's Drax Substation.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
Document 2016		<p>proposal. Developments and their associated infrastructure should be acceptable in terms of:</p> <ol style="list-style-type: none"> 1. The cumulative impact of the proposal with other existing and proposed energy sector developments; 2. The character and sensitivity of landscapes to accommodate energy development, with particular consideration to the identified Important Landscape Areas, as shown on Figure 11; 3. The effects of development on: <ol style="list-style-type: none"> i. local amenity, including noise, air and water quality, traffic, vibration, dust and visual impact; ii. biodiversity, geodiversity and nature, particularly in relation to designations, displacement, disturbance and collision and the impact of emissions/contamination; iii. the historic environment, including individual and groups of heritage assets above and below ground; iv. telecommunications and other networks; including the need for additional cabling to connect to the National Grid, electromagnetic production and interference, and aeronautical impacts such as on radar systems; v. transport, including the opportunity to use waterways and rail for transportation of materials and fuel, and the capacity of the road network to accommodate development; 	<p>As set out in the Statement of Need [EN010143/APP/7.1] the Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure and low-carbon electricity both during and beyond the critical 2020s timeframe. Maximising the capacity of generation in the resource-rich, well-connected and technically deliverable proposed location for the Scheme, represents a significant and economically rational step forwards in the fight against the global climate emergency.</p> <p>An Environmental Statement (ES) [EN0101043/APP/6.1] and accompanying Appendices [EN0101043/APP/6.2], Figures [EN0101043/APP/6.3], Non-technical Summary [EN0101043/APP/6.4] and Environment Mitigation and Commitments Register [EN0101043/APP/6.5] have been submitted, which assess any impacts the Scheme may have.</p> <p>The Scheme would not result in any residual significant effects on climate change, cultural heritage, ecology, flood risk, drainage and the water environment, socio-economics and land use, human health, dust and soils. This is set out in the relevant chapters of the ES, Volume 1 [EN010143/APP/6.1].</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>vi. increasing the risk of flooding; and vii. the land, including land stability, contamination and soil resources.</p> <p>B. Where appropriate, proposals should include provision for decommissioning at the end of their operational life. Where decommissioning is necessary, the site should be restored, with minimal adverse impact on amenity, landscape and biodiversity, and opportunities taken for enhancement of these features.</p> <p>C. Suitable areas for wind energy development will be identified through a review of the Local Plan and/or preparation of Neighbourhood Development Plans. Prior to the completion of the review proposals involving wind energy development will be determined in accordance with national planning policy and practice guidance.</p>	<p>The Scheme would result in significant effects to landscape and visual, noise and vibration and transport receptors. However, impacts to noise and vibration and transport would only occur during construction, and there would be no significant effects to these receptors during the operation of the Scheme.</p> <p>Chapter 10: Landscape and Visual Amenity, ES Volume 1 [EN010143/APP/6.1] provides an assessment of the Schemes impact on character and sensitivity of landscapes with particular consideration to the identified Important Landscape Areas. The Scheme is not located within any of the identified Important Landscape Areas, and no significant effects are anticipated to any of these.</p> <p>The Scheme is likely to result in a significant adverse effect on the Howden to Bubwith LCA 5A during Operation Year 1 and Year 15 reducing to not significant during decommissioning. The Scheme is likely to result in a significant adverse effect on the West of Holme on Spalding Moor Farmland LCA 5B during Operation Year 1, with effects reducing to not significant during operation Year 15 and decommissioning. It is assessed that none of the remaining character areas will experience significant effects at all assessment scenarios.</p>

Policy Document **Relevant Paragraph/Policy Reference** **Policy requirement**

Compliance with policy

It is considered that the limited landscape and visual effects of the Scheme are clearly and comprehensively outweighed by the benefits of the Scheme in terms of delivering renewable energy infrastructure which is urgently needed in order to create a secure and affordable energy system and to help combat climate change. Therefore, the level of landscape impacts are not considered to be so damaging that they are not offset by the benefits of the Scheme.

Agricultural land quality was a key consideration of the site selection process as set out in **Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1]**. The Scheme is located mostly on lower quality agricultural land, with the majority of the Scheme being on land not classed as Best and Most Versatile (BMV). For the Solar PV Site, 92% of the land used is non BMV land.

The vast majority of agricultural land within the Order limits would be available for return to its existing agricultural use following decommissioning of the Scheme. **Chapter 15: Soils and Agricultural Land, ES Volume 1 [EN010143/APP/6.1]** concludes that a very small amount (0.41 ha) of BMV Subgrade 3a land for tree planting would be permanently removed from agricultural use but would result in an ecological

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement
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Compliance with policy

benefit. 8.97 ha of Subgrade 3b would be permanently removed from agricultural use as a result tree and hedge planting and 2 ha as a result of the potential retention of the Grid Connection Substations and associated accesses.

In addition, the conversion of arable to grassland during the 40 year operational period has the potential to accrue improvement to soil function over a large area during operation which has a slight beneficial effect.

The cumulative impacts of the Scheme with other existing and proposed energy sector developments is set out in **chapters 6 – 16, ES Volume 1 [EN010143/APP/6.1]** and is summarised in **Chapter 17: Cumulative Effects and Interactions, ES Volume 1 [EN010143/APP/6.1]**.

There will not be any new likely significant effects associated with cumulative effects that are not already accounted for by the assessment of the Scheme. An exception is the functional improvement of soil resources that would follow conversion of arable to grassland when considered with the other solar farm proposals in North Yorkshire, which is considered to be moderately beneficial, which is significant.

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
East Riding Local Plan 2012-2029 Strategy Document 2016	Policy EC6 Protecting mineral resources	<p>A. Mineral Safeguarding Areas for sand and gravel, crushed rock, limestone, industrial chalk, clay, and silica sand are identified on the Policies Map.</p> <p>B. Within or adjacent to Mineral Safeguarding Areas, non-mineral development, which would adversely affect the viability of exploiting the underlying or adjacent deposit in the future, will only be supported where it can be demonstrated that the:</p> <ol style="list-style-type: none"> 1. Underlying or adjacent mineral is of limited economic value; 2. Need for the development outweighs the need to safeguard the mineral deposit; 3. Non-mineral development can take place without preventing the mineral resource from being extracted in the future; 4. Non-mineral development is temporary in nature; or 	<p>The Scheme includes provision for decommissioning at the end of its operational life, which will be secured by a requirement in the DCO. The Framework DEMP [EN010143/APP/7.9] sets out the measures the Scheme would take to ensure that the site is restored, with minimal adverse impact on amenity, landscape and biodiversity, and what opportunities will be taken for enhancement of these features.</p> <hr/> <p>Small parts in Solar PV Area 1a and 3c and the Grid Connection Corridor are located within the East Riding of Yorkshire’s Minerals Safeguarding Area (MSA) EC6. Chapter 12: Socio economics and land use, ES Volume 1 [EN010143/APP/6.1] and Appendix 12-2 Communications with Minerals Planning Authorities, ES Volume 2 [EN010143/APP/6.2] explain that the impact of the Scheme on minerals was scoped out of the environmental impact assessment in agreement with the East Riding of Yorkshire Council as the Mineral Planning Authority.</p> <p>The mineral deposits will not be permanently sterilised by the Scheme and can be extracted, if required, after its decommissioning which will commence 40 years after the Scheme’s final commissioning. The construction of the Scheme is minimally invasive and would not impact the</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>5. Underlying or adjacent mineral deposit can be extracted prior to the non-mineral development proceeding, or prior extraction of the deposit is not possible.</p>	<p>underlying geology. In addition, due to the flat topography of the Site no significant earthworks are proposed.</p> <p>The Scheme therefore demonstrates accordance with requirement 3 and 4 of this policy as:</p> <ul style="list-style-type: none"> - The Scheme can be constructed, operated and decommissioned without preventing the mineral resource from being extracted in the future. The location for the Grid Connection Substations that may not be decommissioned is outside the mineral safeguarding area. For the Grid Connection Cable, which may also not be decommissioned, the cable trench is only up to 1.5 m wide and where practicable the route of the Grid Cables will follow field boundaries thereby not preventing the mineral within the MSA being extracted in the future; and - The Scheme is temporary in nature being required to decommission 40 years after final commissioning so would not prejudice future extraction.
<p>East Riding Local Plan 2012-2029</p>	<p>Policy A4 Goole & Humberhead Levels sub area</p>	<p>Plans, strategies and development decisions in the Goole & Humberhead Levels sub area should: B. Economy</p>	<p>The Scheme is located within the Goole and Humberhead Levels sub area as per this policy, however it would predominantly be located in the north east of this area, in areas of agricultural land</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
Strategy Document 2016		<ol style="list-style-type: none"> 1. Support appropriate expansion and diversification of the sub area’s key economic sectors, particularly ports and logistics; manufacturing and engineering; finance and business services; and retail. 2. Make the most of the area as a prime location for economic development that takes advantage of its multi-modal transport infrastructure. 3. Support the development of Capitol Park as a Key Employment Site on the edge of Goole for manufacturing, storage and distribution uses. 4. Support the development of the Ozone Industrial Estate at Howden, and the Green Park Business Park at Newport, predominantly for manufacturing, storage and distribution uses. 5. Support the role that Gilberdyke Industrial Estate has in contributing to the rural economy. 6. Support initiatives aimed at linking employment opportunities with residential areas of Goole and the wider sub area. 7. Support the expansion of Goole Town Centre boundary to incorporate further town centre uses and development opportunities. 8. Encourage value-added, port-related activities and maximise opportunities for intensification and expansion around the sub area’s ports and wharves at Goole and Howdendyke. 	<p>away from the settlements of Snaith, Howden and Gilberdyke, and other along the M62 and B1230.</p> <p>The Scheme is not specifically employment development, however it will generate employment as part of its construction.</p> <p>The Scheme would result in 401 net jobs per annum during construction and would contribute to the development of skills needed for the UK’s transition to Net Zero by 2050 and described within the Net Zero Strategy: Building Back Greener. It is also estimated that the construction of the Scheme would contribute approximately £22.5 million to the national economy, of which £10.1m would likely be within the local area.</p> <p>A Framework Skills, Supply Chain and Employment Plan (FSSCEP) [EN010143/APP/7.15] has been prepared to maximise and pro-actively expand the economic benefits of the Scheme for the local community. The purpose of this is to promote employment and training opportunities associated with the construction and operation of the Scheme. This would include There will be a Requirement in the DCO for the FSSCEP to be developed into a full SSCE plan once the DCO is granted.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>9. Support appropriately located developments aimed at promoting tourism in the sub area, including provision of hotels and the enhancement of Oakhill Country Park.</p> <p>C. Environment</p> <p>1. Support integrated approaches to habitat and species management, safeguarding and enhancing designated sites, including the Humber Estuary, Lower Derwent Valley, River Derwent, River Ouse and Thorne, Crowle and Goole Moors, green infrastructure corridors and the Humberhead Levels Nature Improvement Area, and avoid development that would have a detrimental impact, working in conjunction with neighbouring authorities where appropriate.</p> <p>2. Have regard to the character and quality of landmarks, such as the cranes, ‘Salt and Pepper Pot’ water towers and St. Johns Church in Goole, Howden Minister and Wressle Castle, and respect, and, where possible, enhance views of these features.</p> <p>3. Protect those elements which contribute to the setting and character of the sub area's heritage assets, particularly in Howden, and support initiatives to improve the quality of the public realm in Goole, including the revitalisation of the town centre, extensions to pedestrianised areas and further tree planting.</p>	<p>The Scheme has provided an integrated approach to habitat and species management, as set out in the Framework LEMP [EN010143/APP/7.14] and would provide mitigation to offset the permanent loss of arable land that is functionally linked to the Lower Derwent Valley SPA/Ramsar and Humber Estuary SPA/Ramsar. This mitigation would support habitat for golden plover and pink-footed goose under the operational footprint of the Scheme. A total of 30ha of mitigation habitat will be provided. 15ha of wet grassland will be delivered in the Golden Plover Mitigation Zone adjoining the River Foulness, and 15ha of arable land maintained under a suitable cropping regime and management practices (e.g., longer retention of winter stubbles) will be provided in the Goose Mitigation Zone on a rotational basis. This mitigation would also provide benefits to other species using it. There would therefore be no significant effects to the Lower Derwent Valley and Humber Estuary. Further details are provided in the Habitats Regulation Assessment [EN010143/APP/7.12] and Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1].</p> <p>The Scheme has had regard to the character and quality of Howden Minister and Wressle Castle, and no significant impacts are anticipated on these assets.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>4. Ensure the integrity of the Sherwood Sandstone aquifer, and the Pollington and Cowick Groundwater Source Protection Zones, is protected.</p> <p>5. Proactively manage the risk of flooding posed from the Humber Estuary and the Rivers Aire, Derwent, Don (Dutch River), Ouse, and Trent, as well as the risk of surface water flooding, having regard where appropriate to the relevant Strategic Flood Risk Assessment and flood risk management plans and strategies.</p> <p>6. Prevent coalescence by protecting the character and individual identity of settlements by maintaining Key Open Areas between Goole and Hook, and Snaith and Cowick.</p> <p>7. Manage improvements to the River Aire, River Ouse, Aire and Calder Navigation and Dutch River where it would create economic, environmental and recreational opportunities, and does not adversely affect conservation initiatives or the quality of the natural environment.</p> <p>D. Community and Infrastructure</p> <p>1. Enhance connectivity within the sub area and with the rest of the East Riding and other important centres, such as Hull, Doncaster and Leeds, by supporting transport infrastructure improvements, particularly:</p>	<p>Section 7.7 of Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] includes an assessment of Howden Conservation Area as part of the consideration of Howden Minster, including the kinetic experience of approaches to and from Howden, and those views which assist in appreciating the location of the town in its wider landscape setting. This detailed consideration concluded that the Solar PV Site did not form an identifiable, or important, element of the setting of the conservation area, and, as such, the presence of the operational Scheme would constitute no impact resulting in no effect.</p> <p>The risk of flooding posed from the Humber Estuary and River Derwent and River Ouse have been considered as part of the Scheme’s design. Measures to protect the Scheme against flood risk, and ensure that the Scheme does not cause any flood risk elsewhere are addressed in Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 [EN010143/APP/6.1], the Flood Risk Assessment, Appendix 9-3, ES Volume 2, [EN010143/APP/6.2] and the Design and Access Statement [EN010143/APP/7.3].</p> <p>The FRA has had regard to the relevant strategic flood risk assessment and flood risk management plan and strategies.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<ul style="list-style-type: none">i. improvements to walking, cycling and public transport facilities, including those set out within the Local Transport Plan individual settlement transport strategies and major cross country routes, such as the Transpennine Trail, the Public Right of Way network, and the National Cycle Network;ii. completion of Capitol Park Link Road from M62 Junction 36 to the A161, Goole;iii. M62 Junction 36 Interchange improvements;iv. the Old Goole River Berth at the Port of Goole;v. improved facilities and railway freight capacity at the port of Goole; andvi. structural repair work to the A645 Newland bridge. <p>2. Support the provision of additional infrastructure, including:</p> <ul style="list-style-type: none">i. primary health care capacity, including GPs and dentists across the sub area;ii. drainage and flood alleviation schemes, particularly for Goole, Gilberdyke, and Eastrington;iii. additional secondary school pupil capacity at Goole High School; andiv. additional primary school pupil capacity for existing schools in Goole and Howden, alongside the provision of a new primary school in Goole.	<p>Two new Permissive Paths are proposed as part of the Scheme, however these are not located within this sub area.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
East Riding Local Plan 2012-2029 Strategy Document 2016	Policy ENV1 Integrating high quality design	<p>A. All development proposals will:</p> <ol style="list-style-type: none"> 1. Contribute to safeguarding and respecting the diverse character and appearance of the area through their design, layout, construction and use; and 2. Seek to reduce carbon emissions and make prudent and efficient use of natural resources, particularly land, energy and water. <p>B. Development will be supported where it achieves a high quality of design that optimises the potential of the site and contributes to a sense of place. This will be accomplished by:</p> <ol style="list-style-type: none"> 1. Having regard to the specific characteristics of the site's wider context and the character of the surrounding area; 2. Incorporating an appropriate mix of uses on the site; 3. Having an appropriate scale, density, massing, height and material; 4. Having regard to the amenity of existing or proposed properties; 5. Having an adaptable layout for sites and/or buildings that takes into account the needs of future users; 6. Having regard to healthy lifestyles; 7. Incorporating energy efficient design and arrangements to manage waste; 	<p>The Design and Access Statement [EN010143/APP/7.3] and the Design Principles Statement [EN010143/APP/7.4] set out details of the Scheme design. Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1] sets out how the design has evolved throughout the project.</p> <p>As detailed in section 6 of this Planning Statement [EN010143/APP/7.2] the Scheme has been informed by a detailed and sensitive iterative design process. This has involved taking account of the context and features of the land within the Order limits, sensitive receptors, information from environmental surveys and feedback from stakeholders. The design also takes into account the constraints and opportunities in order to develop a good design that balances the need to maximise renewable energy generation from the Scheme along with the minimisation of potential impacts or provision of mitigation and environmental enhancements where practicable.</p> <p>The Design and Access Statement [EN010143/APP/7.3] sets out the objectives that the Scheme has worked towards throughout its design. These have ensured that the Scheme design:</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>8. Incorporating hard and/or soft landscaping, alongside boundary treatment of an appropriate scale and size, to enhance the setting of buildings, public space and views;</p> <p>9. Promoting equality of safe access, movement and use;</p> <p>10. Having regard to features that minimise crime and the perception of crime;</p> <p>11. Considering the use of public art, where the sense of place and public access or view would justify it;</p> <p>12. Ensuring infrastructure, including green infrastructure and flood mitigation, are well integrated into the development;</p> <p>13. Incorporating, where possible, nature conservation and biodiversity enhancement into the development;</p> <p>14. Paying attention to the use of local materials, architectural styles and features that have a strong association with the area's landscape, geology and built form, with particular attention to heritage assets; and</p> <p>15. Safeguarding the views and setting of outstanding built and natural features and skylines within and adjoining the East Riding, including those features identified in Policies A1-A6.</p> <p>C. Innovative design incorporating new materials and technologies will be supported where the local</p>	<p>a. Seeks to efficiently generate a large amount of renewable energy for supply to the National Electricity Transmission System supporting the delivery of the Government's objectives and commitments for the development of a secure, affordable and low carbon energy system.</p> <p>b. Is sensitively integrated into its landscape setting, to avoid and minimise adverse landscape and visual effects as far as practicable.</p> <p>c. Has sought opportunities to enhance existing biodiversity through the creation of new green infrastructure and create new habitat for wildlife to achieve Biodiversity Net Gain.</p> <p>d. Responds sensitively to its proximity to residential dwellings, settlements and PRow with regard to visual impact, noise and lighting.</p> <p>e. Safeguards the water environment, be resilient from flooding both now and in the future and not increase the risk of flooding elsewhere.</p> <p>f. Is sensitive to heritage assets and their setting where practicable.</p> <p>g. Enhances, where practicable, the existing network of PRow to improve accessibility.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>context and sub areas, with their diverse landscapes, geologies, historical background and built form, have been fully considered as part of the design process.</p> <p>Where possible, the design of development that maximises the use of decentralised and renewable or very low carbon technologies will be supported. This includes expecting that:</p> <ol style="list-style-type: none"> 1. Chosen technology(ies) will be operationally suitable for the development, visually acceptable and not unduly harm amenity; and 2. Larger developments will consider how to contribute/share technologies to meet part of their energy needs, and/or increase the sustainability of existing or new development nearby, and be capable of being adapted over time to further upgrade energy efficiency and allow alternative occupancy and/or use. 	<ol style="list-style-type: none"> h. Is sensitive to the existing land quality and its resources and other land uses. i. Provides safe access and where practicable will not significantly impact the local highway network. <p>By achieving these objectives, the Scheme design meets the criteria that is set out in this policy.</p>
<p>East Riding Local Plan 2012-2029 Strategy Document 2016</p>	<p>Policy ENV2 Promoting a high quality landscape</p>	<p>A. Development proposals should be sensitively integrated into the existing landscape, demonstrate an understanding of the intrinsic qualities of the landscape setting and, where possible, seek to make the most of the opportunities to protect and enhance landscape characteristics and features. To achieve this, development should:</p> <ol style="list-style-type: none"> 1. Protect the character and individual identity of settlements by maintaining their physical 	<p>The Landscape and Visual Impact Assessment undertaken in Chapter 10: Landscape and Visual Impact, ES Volume 1 [EN010143/APP/6.1] has informed the iterative design process, guided by design principles and in response to policy requirements, published landscape character assessment guidance and fieldwork analysis.</p> <p>The overall objective of the landscape design is to integrate the Scheme into its landscape setting and</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>separation, including through the maintenance of the Key Open Areas identified in Policies A1-A6, where there is a risk of settlement coalescence.</p> <p>2. Protect and enhance important open spaces within settlements which contribute to their character.</p> <p>3. Ensure important hedgerows and trees are retained unless their removal can be justified in the wider public interest. Where important hedgerows and trees are lost replacements will usually be required.</p> <p>4. Maintain or enhance the character and management of woodland where appropriate.</p> <p>5. Retain, not detract from, and enhance wetland and water feature characteristics.</p> <p>6. Protect and enhance views across valued landscape features, including flood meadows, chalk grassland, lowland heath, mudflats and salt marsh, sand dunes and chalk cliffs.</p> <p>7. Protect and enhance the undeveloped coast.</p> <p>B. Proposals should protect and enhance existing landscape character as described in the East Riding Landscape Character Assessment, in particular, within the following Important Landscape Areas as shown on the Policies Map:</p> <p>1. The Yorkshire Wolds, with special attention to ensuring developments are of an appropriately high quality and will not adversely affect the</p>	<p>avoid or minimise adverse landscape and visual effects as far as practicable.</p> <p>The Scheme would not have any impacts to Key Open Areas between Goole and Hook, and Snaith and Cowick as identified in Policy A4. Policies A1, A2, A3, A5, and A6 are not relevant to the Scheme.</p> <p>The Scheme minimises the loss of, and avoids significant impacts on, existing hedgerows and trees, where practicable. This includes minimum offsets of:</p> <ul style="list-style-type: none"> a. 15 m from woodlands; b. 10 m from hedgerows increasing to 15 m where there are hedgerow trees; c. 15 m from individual trees; <p>Chapter 8: Ecology, ES Volume 1 [EN101043/APP/6.1] concludes that there would be no loss of ancient woodland, or veteran or ancient trees as a result of the Scheme. There would be no loss of semi-natural woodland required, and Root Protection Area incursions can be managed so that there will be no detrimental impacts on the health or amenity of retained trees. No plantation woodland that is mapped as Priority woodland will be lost during construction of the Scheme.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>historic and special character, appearance or natural conservation value.</p> <p>2. The Heritage Coast designations at Flamborough and Spurn Head.</p> <p>3. The Lower Derwent Valley, which includes the River Derwent Corridor and Pocklington Canal.</p> <p>4. The Thorne, Crowle and Goole Moors</p>	<p>Some tree and hedgerow removal will be required to facilitate construction of the Scheme, as detailed in Appendix 10-5: Arboricultural Impact Assessment and Tree Protection Report, ES Volume 2 [EN010143/APP/6.2]. Tree loss will be mitigated with a robust and high quality scheme of new tree planting as detailed in the Framework LEMP [EN010143/APP/7.14]. As such, there is not anticipated to be any significant effects to hedgerows and trees.</p> <p>The final level of arboricultural impacts and requirement for pruning will be reviewed and identified at the detailed design stage and will be confirmed in an Arboricultural Method Statement as part of the CEMP secured by a requirement in the DCO. This is a commitment in the Framework CEMP [EN01043/APP/7.7].</p> <p>The Scheme includes habitat enhancement through the creation of water meadow habitat along the river floodplain within the area of habitat enhancement east of Solar PV 1e, and the eastern part of the Ecology Mitigation Area to provide habitat for invertebrates, mammals and birds, suitable for being managed by grazing in the long term.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement
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Compliance with policy

As noted above, the Scheme is likely to result in a significant adverse effect on the Howden to Bubwith LCA 5A during Operation Year 1 and Year 15 reducing to not significant during decommissioning. The Scheme is likely to result in a significant adverse effect on the West of Holme on Spalding Moor Farmland LCA 5B during Operation Year 1, with effects reducing to not significant during operation and decommissioning. It is assessed that none of the remaining character areas will experience significant effects at all assessment scenarios.

It is considered that the limited landscape and visual effects of the Scheme are clearly and comprehensively outweighed by the benefits of the Scheme in terms of delivering renewable energy infrastructure which is urgently needed in order to create a secure and affordable energy system and to help combat climate change. Therefore, the level of landscape impacts are not considered to be so damaging that they are not offset by the benefits of the Scheme.

There is no visibility from the Yorkshire Wolds NCA to the Scheme.

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
East Riding Local Plan 2012-2029 Strategy Document 2016	Policy ENV3 Valuing our heritage	<p>A. Where possible, heritage assets should be used to reinforce local distinctiveness, create a sense of place, and assist in the delivery of the economic well-being of the area. This can be achieved by putting assets, particularly those at risk, to an appropriate, viable and sustainable use.</p> <p>B. The significance, views, setting, character, appearance and context of heritage assets, both designated and non-designated, should be conserved, especially the key features that contribute to the East Riding’s distinctive historic character including:</p> <ol style="list-style-type: none"> 1. Those elements that contribute to the special interest of Conservation Areas, including the landscape setting, open spaces, key views and vistas, and important unlisted buildings identified as contributing to the significance of each Conservation Area in its appraisal; 2. Listed Buildings and their settings; 3. Historic Parks and Gardens and key views in and out of these landscapes; 	<p>For the Derwent Valley, Barmby on the March to Pocklington Canal Reach, it is assessed that there would be no change to landscape characteristics in comparison with the baseline as a result of the Scheme.</p> <hr/> <p>Chapter 7, Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] and its supporting appendices [EN010143/APP/6.2] provide an assessment of the likely effects of the Scheme upon heritage assets, including a description of the significance of the heritage assets. Regard is given to the HER.</p> <p>Section 7.6 of Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] outlines the avoidance and mitigation measures embedded within the Scheme design in relation to cultural heritage.</p> <p>It sets out that physical impacts to known heritage assets within the Order limits have been avoided by the Scheme design, where practicable. This includes the avoidance of the moated site east of Gribthorpe (MHU3206), a non designated heritage asset.</p> <p>The planning of construction and decommissioning traffic routes and modes of transport have sought to reduce impacts to numerous receptors, including the town of Howden.</p>

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		<p>4. The dominance of the church towers and spires as one of the defining features of the landscape, such as those of Holderness and the Wolds;</p> <p>5. Heritage assets associated with the East Yorkshire coast and the foreshore of the Humber Estuary;</p> <p>6. The historic, archaeological and landscape interest of the Registered Battlefield at Stamford Bridge;</p> <p>7. The historic cores of medieval settlements, and, where they survive, former medieval open field systems with ridge and furrow cultivation patterns;</p> <p>8. The nationally important archaeology of the Yorkshire Wolds; and</p> <p>9. Those parts of the nationally important wetlands where waterlogged archaeological deposits survive.</p> <p>C. Development that is likely to cause harm to the significance of a heritage asset will only be granted permission where the public benefits of the proposal outweigh the potential harm. Proposals which would preserve or better reveal the significance of the asset should be treated favourably.</p> <p>D. Where development affecting archaeological sites is acceptable in principle, the Council will seek to ensure mitigation of damage through preservation of the remains in situ as a preferred</p>	<p>The Order limits have been designed to avoid or minimise potential changes to the setting of designated heritage assets, including Grade I, Grade II* and Grade II listed buildings.</p> <p>Mitigation also includes the careful siting of the construction compounds within the Solar PV Areas and the chosen colour palette for above-ground components, which will be green to reflect the prevailing landscape.</p> <p>As set out in the Framework LEMP [EN010143/APP/7.14], the Scheme would include management of existing woodland and hedgerows (including important hedgerows) to ensure historic boundaries are protected, whilst also increasing the level of screening from visual receptors.</p> <p>Furthermore, the nature of the landscape, comprising many hedgerow boundaries and areas of tree planting, and restricted views of the land within the Order limits reduces the potential for heritage assets to experience change as a result of the Scheme's construction.</p> <p>Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] and the Heritage Statement (Appendix D of this Planning Statement [EN010143/APP/7.2]) concludes that there will be no residual significant effect on designated heritage</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>solution. When in situ preservation is not justified, the developer will be required to make adequate provision for excavation and recording before or during development.</p>	<p>assets or their setting as a result of the Scheme, and the Scheme would not lead to any loss or substantial harm to any designated heritage assets. This includes listed buildings, registered parks and gardens, conservations areas or scheduled monuments.</p> <p>Section 7.7 of Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] includes an assessment of Howden Conservation Area as part of the consideration of Howden Minster, including the kinetic experience of approaches to and from Howden, and those views which assist in appreciating the location of the town in its wider landscape setting. This detailed consideration concluded that the Solar PV Site did not form an identifiable, or important, element of the setting of the conservation area, and, as such, the presence of the operational Scheme would constitute no impact resulting in no effect.</p> <p>Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] concludes that the Scheme would result in significant effects to eight non-designated heritage assets. These comprise of Hagthorpe moated site, which is a non-designated asset of schedulable quality, the historic farmstead at Johnson’s Far, and six archaeological assets (six areas of Romano-British settlement archaeology).</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
East Riding Local Plan 2012-2029	Policy ENV4 Conserving and enhancing	A. Proposals that are likely to have a significant effect on an International Site will be considered in the context of the statutory protection which is afforded to the site.	<p>Therefore, additional mitigation in the form of a programme of archaeological excavation and recording is proposed, and will be set out in an Overarching Written Scheme of Investigation for Archaeological Mitigation.</p> <p>It is acknowledged that while archaeological excavation and recording would not minimise the physical impact to these assets, as the archaeological evidence would still be removed, it would compensate for their loss by preserving them by record; thereby allowing their continued study and achieving greater understanding and appreciation of their heritage value. This would reduce the magnitude of impact on individual assets, resulting in a residual minor adverse effect, which is not significant.</p> <p>The effects above are outweighed by the very significant public benefits of the Scheme which are set out in section 5.3 of this Planning Statement [EN010143/APP/7.2], when considered in isolation and cumulatively with other adverse effects of the Scheme.</p>
			The Scheme would not have any significant effects on any international sites. It would also not have any significant effects on any national site.

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
Strategy Document 2016	biodiversity and geodiversity	<p>B. Proposals that are likely to have an adverse effect on a National Site (alone or in combination) will not normally be permitted, except where the benefits of development in that location clearly outweigh both the impact on the site and any broader impacts on the wider network of National Sites.</p> <p>C. Development resulting in loss or significant harm to a Local Site, or habitats or species supported by Local Sites, whether directly or indirectly, will only be supported if it can be demonstrated there is a need for the development in that location and the benefit of the development outweighs the loss or harm.</p> <p>D. Where loss or harm to a National or Local designated site, as set out in Table 9, cannot be prevented or adequately mitigated, as a last resort, compensation for the loss/harm must be agreed. Development will be refused if loss or significant harm cannot be prevented, adequately mitigated against or compensated for.</p> <p>E. Proposals should further the aims of the East Riding of Yorkshire Biodiversity Action Plan (ERYBAP), designated Nature Improvement Areas (NIAs) and other landscape scale biodiversity initiatives. To optimise opportunities to enhance biodiversity, proposals should seek to achieve a</p>	<p>The Scheme includes mitigation to be delivered to offset the permanent loss of arable land that is functionally linked to the Lower Derwent Valley SPA/Ramsar and Humber Estuary SPA/Ramsar, with abundances of qualifying species (i.e., golden plover and pink-footed goose), reaching or approaching the 1% population threshold. Mitigation would provide supporting habitat for golden plover and pink-footed goose under the operational footprint of the Scheme, and it is therefore concluded that the Scheme would not result in any significant adverse effects on these international sites. Further details are provided in the Habitats Regulation Assessment [EN010143/APP/7.12] and Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1].</p> <p>As set out in Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] there are two non-statutory sites of nature conservation within the Order limits. These comprise Tottering Lane, Gribthorpe Local Wildlife Site (LWS) and Wressle Verge LWS.</p> <p>To limit disturbance to habitat inside these LWS during construction, the working area for the cable installation across the verges will be kept to a minimum of 5m width inside the LWSs and no spoil, materials or vehicles will be stored within the LWS. Once the cable(s) have been installed, the removed turfs and soil from the LWS (stored separately to that</p>

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		<p>net gain in biodiversity where possible and will be supported where they:</p> <ol style="list-style-type: none"> 1. Conserve, restore, enhance or recreate biodiversity and geological interests including the Priority Habitats and Species (identified in the ERYBAP) and Local Sites (identified in the Local Sites in the East Riding of Yorkshire). 2. Safeguard, enhance, create and connect habitat networks in order to: <ol style="list-style-type: none"> i. protect, strengthen and reduce fragmentation of habitats; ii. create a coherent ecological network that is resilient to current and future pressures; iii. conserve and increase populations of species; and iv. promote and enhance green infrastructure. 	<p>of adjacent fields) will be backfilled and replaced promptly, retaining the original topsoil and seed bank. Hedgerows would be retained and appropriate measures (e.g., fencing and signage) will ensure no encroachment into the LWSs, outside of the required working areas.</p> <p>Vegetation clearance will be required for provision of the new and modified existing access tracks across the LWSs. The replacement of the hedgerows and retention of the verge turfs relating to this work has been included within the landscape design (as presented in the Framework LEMP [EN010143/APP/7.14]).</p> <p>Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] states that where temporary habitat loss is unavoidable, reinstatement will be undertaken after construction where practicable. Large areas of grassland creation is included within the landscape design throughout the Solar PV Areas, both around the solar PV panels and in the field margins of each field. These can be managed towards LWS criteria.</p> <p>Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] with the implementation of embedded mitigation, there would be no significant</p>

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			<p>adverse effects on local or regional biodiversity sites as a result of construction, operation or decommissioning of the Scheme.</p> <p>The Applicant is committed to exceeding the Government’s 10% target for biodiversity net gain as set out in the Environment Act 2021. A Biodiversity Net Gain (BNG) report [EN010143/APP/6.2], Natural England’s Biodiversity Metric 4.0, has been produced for the DCO Application. This report demonstrates that the Scheme has the potential to deliver significant biodiversity net gain on the Site, with 80% gain predicted for habitat biodiversity units.</p> <p>Details of the ecological mitigation and enhancement measures that form part of the Scheme are included in Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] and the Framework LEMP [EN010143/APP/7.14].</p>
<p>East Riding Local Plan 2012-2029 Strategy Document 2016</p>	<p>Policy ENV5 Strengthening green infrastructure</p>	<p>A. Development proposals should:</p> <ol style="list-style-type: none"> 1. Incorporate existing and/or new green infrastructure features within their design; and 2. Capitalise on opportunities to enhance and/or create links between green infrastructure features such as those listed in Table 10. Links should be created both on-site and, where possible, with nearby green infrastructure features. 	<p>The Scheme would support this policy through the provision of new green infrastructure elements and corridor throughout the Solar PV Site, to increase habitat connectivity, enhance landscape condition and improve visual amenity within sometimes degraded agricultural landscapes.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>B. Development proposals within, or in close proximity to, a green infrastructure corridor should enhance the functionality and connectivity of the corridor.</p>	<p>Green infrastructure includes provision of species rich grassland, woodland and hedgerow habitats throughout the Site, as mitigation but which will also enhance ecological connectivity and habitat. New woodland and shelter belts would provide increased structure, ecological connectivity, and interest within the landscape. And new scrub, woodland edge, and associated mosaic habitats, some of which may be allowed to develop through natural regeneration would be of value to breeding birds and other wildlife. New native species rich hedgerows with hedgerow trees would be provided as mitigation and to provide ecological connectivity.</p> <p>The Scheme would also include the enhancement of the current PRow network of which two indicative routes are shown on Figure 2-3, ES Volume 3 [EN010143/APP/6.3].</p> <p>The first proposed permissive path is a continuation of Bridleway SPALB08 which currently terminates at Johnson's Farm (the site of the Operations and Maintenance Hub). This is proposed to also allowing travel on horses in response to feedback from the East Riding of Yorkshire Council's PRow team. The proposed permissive path runs northwards for approximately 340 m until it connects with the second proposed permissive path.</p>

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			<p>The second proposed permissive path runs eastwards from footpath SPALF14, connecting with the first permissive path and continuing eastwards to the edge of the grassland habitat created in the east of Solar PV Area 1e. The path would be approximately 1.4 km in length. From discussions with East Riding of Yorkshire Council's PRow Team it is proposed that the section from SPALF14 to the connection with the first permissive path will allow travel on horses.</p> <p>Perimeters would be planted with species-rich grassland or flower rich grassland (Solar PV area 2f) and clumps of low-growing native woodland edge to break up channelled views created by the proposed Solar PV fencing, and new native hedgerows with trees are proposed along the Howden 20 Route and PRow BUBWF10.</p>
<p>East Riding Local Plan 2012-2029 Strategy Document 2016</p>	<p>Policy ENV6 Managing environmental hazards</p>	<p>A. Environmental hazards, such as flood risk, coastal change, groundwater pollution and other forms of pollution, will be managed to ensure that development does not result in unacceptable consequences to its users, the wider community, and the environment.</p> <p>Flood risk</p>	<p>A FRA is provided at Appendix 9-3, ES Volume 2 [EN01043/APP/6.2]. This demonstrates how the development passes the Sequential Test including its application at the site level. The Sequential Test has considered East Riding of Yorkshire's Strategic Flood Risk Assessment (SFRA) and the Environment Agency's Flood Map, within appropriate search areas.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>B. The risk of flooding to development will be managed by applying a Sequential Test to ensure that development is steered towards areas of lowest risk, as far as possible. The Sequential Test will, in the first instance, be undertaken on the basis of the East Riding of Yorkshire Strategic Flood Risk Assessment (SFRA) and the Environment Agency's Flood Map, within appropriate search areas. Where development cannot be steered away from Flood Zone 3, the sub-delineation of Zone 3a, detailed within the relevant SFRA, will be used to apply the Sequential Test, with preference given to reasonably available sites that are in the lower risk/hazard zones. Where necessary, development must also satisfy the Exception Test.</p> <p>C. If, following application of the Sequential Test, it has not been possible to successfully steer development to Flood Zone 1 or a sequentially preferable site, a Sequential Approach will be taken to site layout and design, aiming to steer the most vulnerable uses towards the lowest risk parts of the site and upper floors.</p> <p>D. Flood risk will be proactively managed by: 1. Ensuring that new developments:</p> <ul style="list-style-type: none"> i. limit surface water run-off to existing run-off rates on greenfield sites, and on previously 	<p>The majority of the Solar PV Site is located within Flood Zone 1 (lowest risk of fluvial flooding). However, the Solar PV Site also includes Solar PV Areas wholly within Flood Zone 2 (medium risk of fluvial flooding) and limited areas of Flood Zone 3 (high risk). There are small areas of ground water flooding susceptibility and surface water flooding risk also within the Solar PV Site. Given the risk of flooding within the Solar PV Site, the Sequential Test is required to be demonstrated.</p> <p>The Sequential Test Report appended to the FRA [EN010143/APP/6.2], sets out the assessment undertaken as part of the Sequential Test. It concludes that it is considered that no alternative sites are considered appropriate or reasonably available for the Scheme. Therefore, the Scheme satisfies the Sequential Test.</p> <p>The majority of the Grid Connection Corridor is located within high and medium risk of fluvial flooding (Flood zone 2 and 3). As set out in Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1], the majority of the land around the point of connection is flood zone 2 or 3 and as such there are no reasonable alternative routes for the Grid Connection Corridor outside of Flood Zone 2 and 3. Because of this, and the small number of solar</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>developed land reduce existing run-off rates by a minimum of 30%, or to greenfield run-off rate;</p> <p>ii. do not increase flood risk within or beyond the site;</p> <p>iii. incorporate Sustainable Drainage Systems (SuDS) into major development proposals and proposals at risk of flooding, unless demonstrated to be inappropriate;</p> <p>iv. do not culvert or otherwise build over watercourses, unless supported by the Risk Management Authority;</p> <p>v. have a safe access/egress route from/to Flood Zone 1 or establish that it will be safe to seek refuge at a place of safety within a development;</p> <p>vi. incorporate high levels of flood resistant and resilient design if located in a flood risk area; vii. are adequately set-back from all watercourses including culverted stretches; and</p> <p>viii. adhere to other relevant SFRA recommendations.</p> <p>2. Supporting proposals for sustainable flood risk management, including the creation of new and/or improved flood defences, water storage areas and other schemes, provided they would not cause unacceptable adverse environmental, social, or economic impacts.</p> <p>3. Supporting the removal of existing culverting and returning these sections to open watercourse.</p>	<p>PV infrastructure also proposed in Flood Zone 3, it is therefore necessary to apply the Exception Test.</p> <p>The Scheme will provide wider sustainability benefits by contributing to energy security, affordability and helping to achieve the government targets for Net Zero, which outweigh flood risk, and appropriate mitigation has been considered to ensure that the Scheme remains operational and is safe during times of flooding. It has therefore been demonstrated that the Exception Test has been met.</p> <p>The risk of surface water flooding to the majority of the Solar PV Site and Interconnecting Cable Corridor is considered to be 'very low'. There are a few areas where the risk is higher but these generally cover a small spatial extent. A Framework Surface Water Drainage Strategy Appendix 9-4, ES Volume 2 [EN010143/APP/6.2] incorporating SuDS has been prepared to manage these flow paths to ensure that the development remains safe throughout its lifetime.</p> <p>The FRA details embedded mitigation measures alongside the Framework Surface Water Drainage Strategy, Appendix 9-4 of Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 2 [EN010143/APP/6.2], to ensure that the project is appropriately flood resilient and resistant. The Framework CEMP [EN010143/APP/7.7] includes</p>

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		<p>4. Designating areas of Flood Zone 3b (Functional Floodplain) and safeguarding land for current and future flood risk management, on the Policies Map.</p> <p>Groundwater pollution</p> <p>H. The risk of groundwater pollution will be managed by:</p> <ol style="list-style-type: none"> 1. Avoiding development that will increase the risk of pollution in Source Protection Zones (SPZ) and where this is not possible, ensuring that appropriate mitigation measures are employed; 2. Supporting developments which will decrease the risk of pollution in SPZs by cleaning up contaminated land and incorporating pollution-prevention measures; 3. Preventing inappropriate uses/activities in SPZ1 and SPZ2, unless adequate safeguards against possible contamination can be agreed; 4. Preventing non-mains drainage that would involve sewage, trade effluent or other contaminated discharges, as far as possible; and 5. Ensuring re-development of previously developed sites does not contaminate under-lying aquifers. 	<p>measures such as safe access and escape routes where required and ensures that any residual risk can be safely managed over the lifetime of the development.</p> <p>There would be no new culverts as part of the Scheme, but existing culverts may be upgraded or slightly extended.</p> <p>The Design and Access Statement [EN010143/APP/7.3] sets out details of how the Scheme’s design will safeguard the water environment, be resilient to flooding both now and in the future, and not increase the risk of flooding elsewhere. This includes high levels of flood resistant and resilient design.</p> <p>A Phase 1 Preliminary Risk Assessment (PRA) report has been prepared, covering land within the Order limits, and is available in Appendix 16-3, ES Volume 2 [EN010143/APP/6.2]. The information collected as part of the PRA suggest that the potential risks that have been identified from potential contaminated land are very low to moderate. It concludes that no significant constraints are anticipated with regards to contamination of soil and groundwater that would limit the development of the Site for a solar PV project.</p>

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			<p>A number of environmental design and management measures will be employed as standard best practice to minimise impacts to both human health and controlled waters during the construction and decommissioning phases of the Scheme. These will be incorporated into the Framework CEMP, OEMP and DEMP ([EN010143/APP/7.7], [EN010143/APP/7.8], [EN010143/APP/7.9]) which will be provided alongside the ES [EN010143/APP/6.1] as part of this Application.</p>
<p>East Riding Local Plan 2012-2029 Strategy Document 2016</p>	<p>Policy C2 Supporting community services and facilities</p>	<p>A. In order to maintain and improve access to a range of services and facilities in East Riding, which meet the needs of residents and in appropriate circumstances visitors, proposals will be supported that:</p> <ol style="list-style-type: none"> 1. Retain or enhance existing services and facilities; and/or 2. Provide for new services and facilities, including, where appropriate, new mixed use and multi-purpose facilities. <p>B. Where services and facilities are provided as part of new development they should be well integrated within that development.</p> <p>C. The loss of health, education, and other services and facilities will only be permitted if:</p> <ol style="list-style-type: none"> 1. It is proved the existing use and proposals for alternative community uses on the site are not 	<p>As discussed in Chapter 12: Socio Economics and Land Use and Chapter 14: Human Health, ES Volume 1 [EN010143/APP/6.1], the Scheme would not result in any significant impact on existing services or facilities. Given the nature of the Scheme, no new services or facilities are proposed as part of the project.</p>

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		<p>economically viable, and there is insufficient demand to support them; 2. The loss is part of a wider proposal to improve service provision in the locality; or 3. Existing facilities can adequately serve identified needs, in an equally accessible manner. D. The views of the local community, and relevant Town or Parish Council(s), will be important in order to establish the significance of, and demand for, individual facilities and develop solutions to enable their retention.</p>	

1.2 Table 2: East Riding Local Plan Update 2020-2039

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
East Riding Local Plan Update 2020-2039	Policy S1 Sustainable development	<p>Development proposals</p> <p>A. When considering development proposals the Council will take a positive approach that reflects the three overarching objectives of sustainable development as set out in paragraph 8 of the National Planning Policy Framework, economic, social and environmental, whilst taking in to account local circumstances. It will work proactively with applicants to find solutions which mean that proposals can be approved wherever possible, and to secure development that supports the Council’s Vision and Objectives for the Local Plan and the other documents which make up the development plan.</p> <p>B. The Local Plan should be read as a whole and in conjunction with the other documents which make up the development plan. Planning applications that accord with the policies in the development plan will be approved without delay, unless material considerations indicate otherwise.</p> <p>C. Proposals should ensure that, where appropriate, development will support the future sustainable growth of settlements. Future access and connectivity to neighbouring land should be taken in to consideration.</p>	<p>The environmental impacts of the Scheme have been assessed as reported in the ES [EN0101043/APP/6.1-6.4] and are discussed in this Planning Statement [EN010143/APP/7.2]. Overall, with appropriate mitigation implemented, the Scheme is expected to have limited and localised residual significant adverse effects during its 40 year operation when considered relative to the large scale nature of the Scheme. These effects are therefore considered to be outweighed by the significant national benefits that the Scheme will provide. As explained further in this section of the Planning Statement [EN010143/APP/7.2], there are no specific and relevant policies set out in the relevant NPSs which clearly indicate that consent should be refused.</p> <p>In summary, the Scheme has a vital role to play in the UK’s urgent response to tackle climate change. The Scheme is critical and will make a timely contribution to the decarbonisation, affordability and security of UK’s energy supply. Any potential residual significant environmental effects are outweighed by the benefits of the Scheme, the contribution towards meeting the energy need being one of these key benefits. There are no policies which clearly indicate that consent should be refused.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
East Riding Local Plan Update 2020-2039	Policy S2 Addressing climate change	<p>Creating Neighbourhood Plans</p> <p>D. The Council actively supports the development of Neighbourhood Development Plans within the East Riding.</p> <p>E. Neighbourhood Development Plans proposing additional growth to that indicated in the Local Plan will be supported where infrastructure and service provision is able to accommodate the growth planned or can be delivered as part of the proposals</p>	<p>The Scheme is therefore in compliance with the relevant national and local policies relating to the need for, and provision of, renewable energy infrastructure. Helping meet this established urgent need should weigh substantially in favour of the DCO being granted.</p>
		<p>Development proposals will be supported where they contribute to a reduction in greenhouse gas emissions and incorporate adaptation to the expected impacts of climate change. This can be accomplished by:</p> <p>A. Directing most new development to areas where there are services, facilities, homes and jobs, which reduces the need to travel and where it can be served more easily by sustainable modes of transport.</p> <p>B. Efficiently using land, mineral, energy and water resources.</p> <p>C. The re-use of the area's building stock and previously developed land.</p> <p>D. Building at higher densities where appropriate and supporting opportunities for mixed use development.</p> <p>E. Promoting sustainable modes of transport and well-connected places.</p>	<p>The Statement of Need [EN010143/APP/7.1] sets out that the Scheme would make a direct contribution to the provision of low carbon generation capacity that is urgently required in order to meet the Government's objectives and commitments for the development of a secure, affordable, and low carbon energy system. This is in accordance with Part H of this policy.</p> <p>The Scheme is located in an area that is served by a network of roads, rain and PRoW. The Applicant will endeavour to encourage all construction staff to the use of lower carbon modes of transport by identifying and communicating local bus and rail connections and pedestrian and cycle access routes to/from the Scheme and providing appropriate facilities for the safe storage of cycles, as set out in Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1].</p>

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		<p>F. Promoting the creation of economic clusters for the renewable and low carbon energy sector.</p> <p>G. Incorporating high standards of sustainable design and construction which involve the prudent and efficient use of natural resources and built-in resilience to the impacts of climate change (e.g. overheating, flood risk).</p> <p>H. Incorporating renewable, low carbon and decentralised energy generation in appropriate locations and schemes.</p> <p>I. Supporting proposals that protect, enhance and link habitat networks to allow biodiversity to adapt to climate change.</p> <p>J. Conserving, enhancing and linking green infrastructure networks to provide flood management, shading for urban areas and natural air conditioning.</p> <p>K. Steering development away from areas of high flood risk, as far as possible, and ensuring development is as resilient as possible to any residual risks</p> <p>L. Supporting effective on-site water management such as Sustainable Drainage Systems and wider flood management proposals</p> <p>M. Implementing the most recent Shoreline Management Plan and Humber 2100+ strategy.</p>	<p>The Scheme would utilise existing farm accesses as far as practicable and would utilise existing modern agricultural buildings at Johnson’s Farm for storage.</p> <p>The Scheme would result in 401 net jobs per annum during construction and would contribute to the development of skills needed for the UK’s transition to Net Zero by 2050 and described within the Net Zero Strategy: Building Back Greener. It is also estimated that the construction of the Scheme would contribute approximately £22.5 million to the national economy, of which £10.1m would likely be within the local area.</p> <p>As detailed in the Design and Access Statement [EN010143/APP/7.3] and Section 6 of the Planning Statement [EN010143/APP/7.2], the Scheme has been informed by a detailed and sensitive iterative design process. This has involved taking account of the context and features of the land within the Order limits, sensitive receptors, information from environmental surveys and feedback from stakeholders. The design also takes into account constraints and opportunities in order to develop a good design that balances the need to maximise renewable energy generation from the Scheme along with the minimisation of potential impacts or provision of mitigation and environmental</p>

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		<p>N. Managing development in coastal areas and facilitate the re-location/roll back of development from areas between Barmston and Spurn Point.</p> <p>O. Exploiting carbon capture approaches through the creation and expansion of woodland, restoration of peat bogs and coastal ecosystems, and the deployment of new technologies.</p> <p>P. Support the development of infrastructure, such as hydrogen transportation, that facilitates decarbonisation.</p>	<p>enhancements where practicable. The design process and basis of design decisions are set out in Chapter 3: Alternatives and Design Evolution [EN010143/APP/6.1], Volume 1 of the ES [EN010142/APP/6.1] and the Design and Access Statement [EN010142/APP/7.3].</p> <p>The Scheme’s embedded mitigation measures have ensured that climate change resilience is build into the design. The Applicant is committed to exceeding the Government’s 10% target for biodiversity net gain as set out in the Environment Act 2021. A Biodiversity Net Gain (BNG) report [EN010143/APP/6.2], Natural England’s Biodiversity Metric 4.0, has been produced for the DCO Application. This report demonstrates that the Scheme has the potential to deliver significant biodiversity net gain on the Site, with 80% gain predicted for habitat biodiversity units. As part of these gains, the Scheme will conserve, enhance and link habitat networks.</p> <p>Green infrastructure includes provision of species rich grassland, woodland and hedgerow habitats throughout the Site, as mitigation but which will also enhance ecological connectivity and habitat.</p> <p>The Scheme would also include the enhancement of the current PRow network, through the provision of</p>

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			<p>two new Permissive Paths, as shown on Figure 2-3, ES Volume 3 [EN010143/APP/6.3].</p> <p>The FRA [EN010143/APP/6.2], and Sequential Test Report (Annex C to the FRA) demonstrates that the Sequential Test has been met for the Solar PV Site, which is predominantly located in Flood Zone 1, with small parts located in Flood Zone 2 and 3. It also demonstrates that the Sequential and Exception Tests are met for the Grid Connection Corridor and part of the Solar PV Site, which is located within Flood Zone 3.</p> <p>A Framework Surface Water Drainage Strategy, Appendix 9-4, ES Volume 2 [EN010143/APP/6.2] is submitted, which sets out the proposed strategy for surface water and drainage, which will be secured by requirements of the DCO. Mitigation measures such as the use of localised SuDS, such as swales and infiltration trenches, will be used to control runoff if required.</p> <p>The Scheme includes a robust and high quality scheme of new tree planting as detailed in the Framework LEMP [EN010143/APP/7.14]. This would comprise new woodland and shelter belts, new scrub, woodland edge, and associated mosaic habitats, and new native species rich hedgerows with</p>

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East Riding Local Plan Update 2020-2039	Policy S3: Focusing development	<p>A. New development will be supported where it is focused within the following locations:</p> <p>1. The defined Settlement Network which consists of land within the development limits of:</p> <p>i. The Major Haltemprice Settlements – those settlements in the East Riding immediately to the west of the City of Hull – Anlaby, Cottingham, Hessle, Kirk Ella and Willerby;</p> <p>ii. Principal Towns – Beverley⁷, Bridlington, Driffield, and Goole;</p> <p>iii. Towns – Elloughton-cum-Brough⁹, Hedon¹⁰, Hornsea, Howden, Market Weighton, Pocklington and Withernsea; iv. Rural Service Centres – Aldbrough, Beeford, Bubwith, Gilberdyke/Newport, Holme on Spalding Moor, Hutton Cranswick, Keyingham, Kilham, Leven, Middleton on the Wolds, Patrington, Snaith, Stamford Bridge and Wetwang; and v. Primary Villages – Bilton, Brandesburton, Cherry Burton, Dunswell, Easington, Eastrington, Flamborough, Leconfield, Melbourne,</p>	<p>hedgerow trees. These may contribute to carbon capture.</p> <p>The Scheme can be constructed, operated and decommissioned without preventing safeguarded mineral resources from being extracted in the future.</p>
			<p>Due to the scale of the land required to deliver the substantial renewable energy generation capacity that the Scheme will provide, and the need to be in sufficient proximity of the connection point to the National Electricity Transmission System (NETS), the Scheme could not be located within the defined Settlement Network.</p>
			<p>As explained in the Statement of Need [EN010143/APP/7.1] and Section 5 of the Planning Statement [EN010143/APP/7.2] explain that the Scheme is a substantial infrastructure asset, capable of delivering large amounts of secure, affordable, low-carbon electricity to local and national networks.</p>
			<p>The contribution the Scheme would make to meeting the established urgent need for renewable energy generation infrastructure warrants its location in the countryside. Policy S4 outlines compliance with this policy.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>Nafferton, North Cave, North Ferriby, Preston, Rawcliffe, Roos, Skirlaugh, South Cave, Swanland, Thorngumbald, Tickton, Walkington, Wawne, Wilberfoss and Woodmansey.</p> <p>2. Key Employment Sites along the East-West Multi-Modal Transport Corridor – Hedon Haven, Humber Bridgehead (Hessle), Melton and Goole36/Capitol Park (Goole).</p> <p>B. Development will be supported where it is an appropriate scale to its location and does not detract from the character and appearance of the settlement. The Major Haltemprice Settlements, Principal Towns and Towns will be the main focus of growth in the East Riding with the Key Employment Sites providing a main focus for employment development. The Rural Service Centres and Primary Villages will provide for more limited development in rural areas complemented by existing employment sites. New development will be encouraged where it involves the reuse of suitable previously developed land.</p> <p>Rural Service Centres and Primary Villages</p> <p>F. To sustain the overall vitality of rural areas, development to meet local community needs and sustainable economic growth will be supported in Rural Service Centres and Primary Villages, complementing the roles of Towns in meeting some of the basic needs</p>	

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East Riding Local Plan	Policy S4 Supporting	<p>outside of the Major Haltemprice Settlements and Principal Towns.</p> <p>G. To ensure the delivery of the overall spatial approach, the following forms of development will be supported in Rural Service Centres and Primary Villages:</p> <ol style="list-style-type: none"> 1. Residential development, including affordable housing, commensurate with the scale, role and character of the village. 2. New and/or enhanced local services and facilities. 3. Economic development appropriate to the scale of the village. <p>Key Employment Sites</p> <p>H. Key Employment Sites will act as a main focus for employment development making use of their strategic location on the East-West Multi-Modal Transport Corridor. They will support the growth of the key employment sectors and clusters by providing significant opportunities for inward investment and expanding local businesses.</p> <p>Development Limits</p> <p>I. Development limits for the settlements and Key Employment Sites listed above are set out on the Draft Policies Map Update or as proposed by a Neighbourhood Plan.</p>	The contribution the Scheme would make to meeting the established urgent need for renewable energy

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
Update 2020-2039	development in Villages and the Countryside	<p>maintain the vibrancy of Villages (listed in Appendix B) and the Countryside where it:</p> <ol style="list-style-type: none"> 1. Is of an appropriate scale to its location taking into account the need to support sustainable patterns of development; 2. Encourages the re-use of previously developed land where appropriate; and 3. Does not involve a significant loss of best and most versatile agricultural land. <p>B. Development in Villages and the Countryside should also accord with the specific provisions of Part C or D of this policy. Proposals not listed under Part D should demonstrate why they require a rural location.</p> <p>Villages</p> <p>C. Within the development limits of Villages, as set out on the Policies Map Update, the following forms of development will be supported where it does not detract from the character and appearance of the village:</p> <ol style="list-style-type: none"> 1. New housing, including affordable housing for local people; 2. New and/or enhanced local services and facilities; and 3. Economic development. <p>Countryside</p>	<p>generation infrastructure warrants its location in the countryside.</p> <p>The Scheme has been informed by a detailed and sensitive iterative design process. This has involved taking account of the context and features of the land within the Order limits, sensitive receptors, information from environmental surveys and feedback from stakeholders. The design also takes into account constraints and opportunities in order to develop a good design that balances the need to maximise renewable energy generation from the Scheme along with the minimisation of potential impacts or provision of mitigation and environmental enhancements where practicable. The design process and basis of design decisions are set out in Chapter 3: Alternatives and Design Evolution [EN010143/APP/6.1], Volume 1 of the ES [EN010142/APP/6.1] and the Design and Access Statement [EN010142/APP/7.3]. It is therefore considered that the Scheme is of an appropriate scale to its location.</p> <p>Agricultural land quality was a key consideration of the site selection process as set out in Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1]. The Scheme is located mostly on lower quality agricultural land, with the majority of the Scheme being on land not classed as Best and</p>

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		<p>D. Outside of a development limit land will be regarded as the Countryside and the following forms of development are supported, where proposals respect the intrinsic character of their surroundings:</p> <ol style="list-style-type: none"> 1. Conversion of buildings for economic development (including work-live units), tourism or community uses. Conversions for new housing will be supported where the preservation of the building would enhance the immediate setting and where it: <ol style="list-style-type: none"> i. would represent the optimal viable use of a heritage asset; or ii. would re-use a redundant or disused building without significant alteration or significant extension. 2. Replacement dwellings and the subdivision of an existing residential building; 3. New dwellings of exceptional quality or of truly outstanding innovative design; 4. Affordable housing for local people which could include community-led housing; 5. Agricultural, forestry or other rural-based occupational dwellings subject to demonstrating an essential need. Such dwellings will be subject to an agricultural occupancy condition; 6. Employment uses in accordance with Policy EC1; 	<p>Most Versatile (BMV). For the Solar PV Site, 92% of the land used is non BMV land.</p> <p>The Scheme is not located within the development limits of any villages as set out in this policy.</p> <p>The Scheme will be located in the Countryside. The Scheme is considered to be regarded as a supported development within the countryside as it would be a development for 'Energy development and associated infrastructure' and would fall under exception 9, Part D of this policy.</p>

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East Riding Local Plan Update 2020-2039	Policy S8 Connecting people and places	<p>7. Agricultural, horticultural and forestry uses; 8. New and enhanced infrastructure; 9. Energy development and associated infrastructure; 10. Development to support existing military defence operations; and 11. Sports, equine, recreation, community facilities and tourism development.</p> <p>A. New development should ensure that people and places are well connected. B. The overall role and function of the Strategic Transport Network, as shown in Figure 5, will be protected and/or enhanced, having regard to the investment priorities, policies, and proposals of the Local Transport Plan and other related strategies. C. Transport schemes that improve the overall capacity and coverage of the transport network will be supported. Where appropriate land will be safeguarded for these schemes in the Allocations Document Update or a Neighbourhood Plan. D. The role and function of the East-West Multi-Modal Transport Corridor, which serves the transport needs of Key Employment Sites, will be protected and/or enhanced, where appropriate, to enable the efficient and integrated movement of freight by, and between, different transport modes as well as</p>	<p>The Scheme is located in an area that is served by a network of roads, rail and PRow.</p> <p>The Statement of Need [EN010143/APP/7.1] and Section 5 of the Planning Statement [EN010143/APP/7.2] explain that the Scheme is a solar farm, capable of delivering large amounts of secure, affordable, low-carbon electricity to local and national networks, and is therefore not a transport scheme.</p> <p>Chapter 13: Transport and Access, ES Volume 1 [EN010143/APP/6.1] sets out the effects of the Scheme on the local and regional transport network. Appendix 13-4, ES Volume 2 [EN010143/APP/6.1] contains a Transport Assessment, prepared in accordance with the appropriate guidance which includes the Travel Plans, TAs and Transport Statements in Decision Taking (2014). The Applicant has consulted with the relevant Highways Authorities and National Highways regarding the assessment</p>

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		<p>for the movement of people from their homes to jobs.</p> <p>E. Roadside facilities and parking essential to support the safety and welfare of motorists and lorry drivers will be supported, where they are of an appropriate scale, meet an identified need, and can be accessed safely.</p> <p>F. Existing and future port operations at Goole within the Operational Port Area, as shown on the Draft Policies Map Update, will be safeguarded from development which would conflict with this use. Where port operations could have a significant adverse effect on new development in its vicinity, applicants should be required to provide suitable mitigation before the development has been completed.</p> <p>G. Existing wharf and rail facilities on the Aire and Calder Canal, River Ouse, Humber Estuary, and elsewhere will be safeguarded to maintain a choice of sustainable transport modes.</p> <p>H. Provision of and improved new walking, cycling and public transport facilities will be supported. Existing and disused public transport, cycling and footpath networks and facilities, including public rights of way, will be enhanced and/or protected, particularly within and linking to the Major Haltemprice Settlements, Principal Towns, and Towns as</p>	<p>and mitigation. Comments from these stakeholders are presented in Section 13.3 of Chapter 13: Transport and Access, ES Volume 1 [EN010143/APP/6.1].</p> <p>The Scheme has been designed to have minimal impact on PRow. As set out in the Design and Access Statement [EN010143/APP/7.3] the Scheme design maintains access to all existing PRow within the Order limits, with no permanent diversions or closures.</p> <p>It also ensures a minimum width for PRow, as well as for the corridor in which they will be provided (between Scheme infrastructure). In all cases the PRow will see perimeter fencing being installed a minimum distance from the centreline of the PRow of 20 m to either side (creating a 40 m corridor) if the solar infrastructure is on both sides of the PRow, and of 15 m if solar infrastructure lies to one side only. This will help avoid the perception of being channelled into narrow passages between solar PV panels;</p> <p>The design proposes perimeters to be planted with species-rich grassland or flower rich grassland (Solar PV area 2f) and clumps of low-growing native woodland edge to break up channelled views created by the proposed Solar PV fencing, and would provide</p>

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		<p>well as existing and proposed blue/green infrastructure corridors.</p> <p>I. Proposals which facilitate integration between different modes of travel, especially walking, cycling and public transport, will be encouraged.</p> <p>J. Initiatives that improve accessibility in rural areas will be supported, through working with the Local Transport Plan and other strategies and programmes, including the community transport sector.</p>	<p>amenity for walkers, cyclists and horse-riders. It would also create new native hedgerows with trees along the Howden 20 Route and PRoW BUBWF10.</p> <p>The Scheme would also include the enhancement of the current PRoW network, with the implementation of Permissive Paths, as shown on Figure 2-3, ES Volume 3 [EN010143/APP/6.3].</p> <p>The first proposed permissive path is a continuation of Bridleway SPALB08 which currently terminates at Johnson's Farm (the site of the Operations and Maintenance Hub). This is proposed to also allowing travel on horses in response to feedback from the East Riding of Yorkshire Council's PRoW team. The proposed permissive path runs northwards for approximately 340 m until it connects with the second proposed permissive path.</p> <p>The second proposed permissive path runs eastwards from footpath SPALF14, connecting with the first permissive path and continuing eastwards to the edge of the grassland habitat created in the east of Solar PV Area 1e. The path would be approximately 1.4 km in length. From discussions with East Riding of Yorkshire Council PRoW Team it is proposed that the section from SPALF14 to the connection with the first permissive path will allow travel on horses.</p>

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East Riding Local Plan Update 2020-2039	Policy S9- Strengthening blue/green infrastructure	<p>A. Development proposals will:</p> <ol style="list-style-type: none"> 1. Incorporate a comprehensive design that is underpinned by its consideration of existing and new blue/green infrastructure features, including those features required by policies ENV1, 2, 3, 4, 5, 6 and C3; and 2. Capitalise on opportunities to: <ol style="list-style-type: none"> i. Maintain, enhance and where possible create links between blue/green infrastructure features such as those listed in Table 6. Links should be created both on-site and, where possible, with nearby blue/green infrastructure features; ii. Utilise potential multifunctional benefits of blue/green infrastructure features; and iii. Enhance blue/green infrastructure opportunities identified in Neighbourhood Plans. <p>B. Development proposals within, or in close proximity to, a blue/green infrastructure corridor should contribute to enhancing the functional and connectivity of the corridor.</p>	<p>The Applicant will also endeavour to encourage all construction staff to the use of lower carbon modes of transport by identifying and communicating local bus and rail connections and pedestrian and cycle access routes to/from the Scheme and providing appropriate facilities for the safe storage of cycles, as set out in Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1].</p> <p>As detailed in the Design and Access Statement [EN010143/APP/7.3], the Scheme has been subject to a detailed and sensitive iterative design process. This has taken account of the context and features of the land within the Order limits, nearby sensitive receptors and assets, information emerging from environmental surveys, feedback from stakeholders, and opportunities and constraints in order to develop a good design that balances the need to maximise the energy generation capacity of the Scheme, with the avoidance and mitigation of impacts, and provision of environmental and other enhancements, where practicable. The design process, objectives and principles are described in Design and Access Statement [EN010143/APP/7.3] and Design Principles Statement [EN010143/APP/7.4].</p> <p>This has included taking consideration of existing and new blue/green infrastructure features, including</p>

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		<p>C. Development proposals should seek to avoid increasing recreational pressures on designated biodiversity assets as set out by Policy ENV4. Where a potential increase is unavoidable proposals will provide mitigation in the form of blue/ green infrastructure provision.</p>	<p>those features required by policies ENV1, 2, 3, 4, 5 and 6.</p> <p>The measures the Scheme has undertaken to maintain, enhance and create links between blue/green infrastructure include:</p> <ul style="list-style-type: none"> a. Increasing the overall woodland cover across the Scheme and connectivity of woodland habitats by linking existing areas of woodland with new areas of planting. b. Proposing new native species rich hedgerows with hedgerow trees where historic field boundaries have been lost through the amalgamation of fields, to provide mitigation, reinforce landscape pattern, ecological connectivity, and interest within the landscape c. Proposing new grassland habitats to provide a corridor connecting Willitofth and Gribthorpe whilst allowing for separation between the Solar PV Areas on the approach to Gribthorpe d. The creation of new habitats within areas of Flood Zone 3 associated with the River Foulness on the eastern boundary of the Solar PV Site. Solar PV Areas 1g and 1h are to be an Ecology Mitigation Area to provide habitat for Pink Footed Goose and Golden Plover.

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			<ul style="list-style-type: none">e. Larger areas of ecological enhancement and mitigation outside panel/infrastructure areas to be seeded with species-rich grassland mixes. Areas will include mixes suitable for skylark habitat, golden plover and other ground nesting birds;f. Habitat enhancement through the creation of water meadow habitat along the river floodplain within the area of habitat enhancement east of Solar PV 1e, and the eastern part of the Ecology Mitigation Area to provide habitat for invertebrates, mammals and birds, suitable for being managed by grazing in the long term.g. New woodland and shelter belts to be planted to provide increased structure, ecological connectivity, and interest within the landscape;h. New scrub, woodland edge, and associated mosaic habitats, some of which may be allowed to develop through natural regeneration. Such habitats are of value to breeding birds and other wildlife;i. includes new native species rich hedgerows with hedgerow trees to provide mitigation and ecological connectivity. Additional trees will be planted to replace potential tree loss due to ash dieback;

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			<ul style="list-style-type: none"> j. includes a new native traditional orchard providing additional habitat for mammals and birds; k. proposes new grassland seeding under the solar PV panel areas, providing an extensive habitat across the Solar PV Site. l. proposes species-rich grassland outside the fence line of the Solar PV Areas, along hedge margins, under power lines and between solar panel areas; m. comprises a range of artificial bird and bat boxes to be installed in existing woodland and trees, and retained/modified buildings, to increase the availability of nesting and roosting features and enhance their value as habitat for these species; n. creates habitat piles and hibernacula to provide refuge and hibernation opportunities for amphibians and reptiles, as well as dead wood habitat for invertebrates, which would in turn benefit fauna such as bats and birds; and <p>All of these measures would help to maintain, enhance and create links between blue/green infrastructure features such as those listed in Table 6. The Scheme therefore contribute to enhancing the functional and connectivity of blue/green corridors within East Riding of Yorkshire.</p>

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East Riding Local Plan Update 2020-2039	Policy EC1 Supporting the growth and diversification of the East Riding economy	<p>To strengthen and encourage growth of the East Riding economy, employment development will be supported where the proposal is of a scale suitable to the location. Proposals will be encouraged where they:</p> <ol style="list-style-type: none"> 1. Contribute to the modernisation, development and diversification of the local economy, including remote working and co-working; 2. Develop and strengthen the East Riding's key employment sectors and clusters including: renewable energy; manufacturing and engineering (including chemicals); agriculture/food and drink; biorenewables; tourism; ports and logistics; transport equipment; digital and creative industries; finance and business services; construction; public administration, defence, health and education; and retail; 3. Contribute towards reducing social exclusion and provide employment opportunities in deprived areas; 4. Contribute to the improvement in the physical appearance of an existing or vacant employment site or premises; or 5. Support the vitality and viability of a Town or District Centre. <p>B. Key Employment Sites will be safeguarded from alternative uses.</p>	<p>The Scheme is not specifically employment development, however it will generate employment as part of its construction.</p> <p>The Scheme would result in 401 net jobs per annum during construction and would contribute to the development of skills needed for the UK's transition to Net Zero by 2050 and described within the Net Zero Strategy: Building Back Greener. It is also estimated that the construction of the Scheme would contribute approximately £22.5 million to the national economy, of which £10.1m would likely be within the local area.</p> <p>A Framework Skills, Supply Chain and Employment Plan (FSSCEP) [EN010143/APP/7.15] has been prepared to maximise and pro-actively expand the economic benefits of the Scheme for the local community. The purpose of this is to promote employment and training opportunities associated with the construction and operation of the Scheme. This would include There will be a Requirement in the DCO for the FSSCEP to be developed into a full SSCE plan once the DCO is granted.</p>

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		<p>C. There will be a presumption in favour of retaining all other employment land and premises. Proposals involving the loss of land or premises from employment use will be supported where:</p> <ol style="list-style-type: none">1. There is no longer a need, or it is not viable, for that or any other employment use on the site, which has been demonstrated by an up-to-date employment land review or through a comprehensive marketing exercise;2. The use of the site for employment purposes is not in conformity with adjoining land uses and could give rise to complaint; or3. The development would make a significant contribution towards the wider regeneration of the locality and would support other planning priorities set out in the Plan. <p>D. Outside of development limits employment development will be supported where it is of an appropriate scale to its location, is accessible and respects the character of the surrounding landscape. Proposals should:</p> <ol style="list-style-type: none">1. Be within or adjacent to an existing industrial estate or business park;2. Involve the expansion of an existing business;3. Involve the conversion of an existing building;	

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		<p>4. Involve the redevelopment of redundant agricultural buildings that are no longer viable for agricultural uses, where conversion is not practicable; or</p> <p>5. Have a functional need to be in the particular location which cannot be met on either a nearby allocation, or on a site which satisfies any of the above criteria.</p> <p>E. Substantial proposals for employment development that cannot be accommodated on allocated sites will be supported where the:</p> <p>1. The site is identified as part of the Freeport tax zone and a comprehensive plan for its development is in place; or</p> <p>2. The development is for a specified end user where proven substantial employment benefits would arise and the identified site provides the most appropriate location for the proposal, with priority given to locations that are adjacent to existing employment sites and in locations well-related to the Major Haltemprice Settlements, Principal Towns or the East-West Multi-Modal Transport Corridor</p> <p>F. Farm diversification schemes will be encouraged providing they are of an appropriate scale to their location, respect the character of the surrounding landscape, re-use existing buildings where possible and any new</p>	

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East Riding Local Plan Update 2020-2039	Policy EC4 Enhancing sustainable transport	<p>buildings are well related to the built form and scale of the farm.</p> <p>G. Employment allocations are set out in the Allocations Document Update or a Neighbourhood Plan.</p> <hr/> <p>A. In order to increase overall accessibility, minimise congestion, improve safety, reduce greenhouse gas emissions, encourage healthy lifestyles and reduce social exclusion, new development will be supported where it is accessible, or can be made accessible, by sustainable modes of transport and addresses its likely transport impact. Development proposals should:</p> <ol style="list-style-type: none"> 1. Produce and agree a transport assessment and travel plan, where a significant transport impact is likely; 2. Encourage the use of sustainable travel options which may include public transport, electric and ultra-low emission vehicles, car sharing, cycling and walking; particularly in the Major Haltemprice Settlements, Principal Towns, and Towns; and 3. Bring forward other necessary transport infrastructure to accommodate expected movement to and from the development. <p>B. Developments generating significant freight movement located along the East-West Multi-Modal Transport Corridor should capitalise on</p>	<p>Chapter 13: Transport and Access, ES Volume 1 [EN010143/APP/6.1] sets out the effects of the Scheme on the local and regional transport network. Appendix 13-4, ES Volume 2 [EN010143/APP/6.1] contains a Transport Assessment, prepared in accordance with the appropriate guidance which includes the Travel Plans, TAs and Transport Statements in Decision Taking (2014). The Applicant has consulted with the relevant Highways Authorities and National Highways regarding the assessment and mitigation. Comments from these stakeholders are presented in Section 13.3 of Chapter 13: Transport and Access, ES Volume 1 [EN010143/APP/6.1].</p> <p>During construction, it has been identified that with embedded mitigation measures in place there could be potentially significant adverse effects at Link 15 in terms of construction traffic increase during the hours of 06:00-07:00 and 19:00-20:00. Over the course of a 24-hour period, during construction (and decommissioning), it is anticipated that Link 15 will see a 6% increase in total traffic and a 0% increase in HGV traffic. This indicates that the overall impact</p>

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		<p>the opportunities for transferring and transporting freight by means other than road.</p> <p>C. The number of parking spaces for all new development should reflect:</p> <ol style="list-style-type: none">1. Accessibility of development, particularly by public transport;2. The expected car usage on the site, including an adequate provision of spaces for the charging of plug-in electric and other ultra-low emission vehicles; and3. The most efficient use of space available and promotion of good design.	<p>on the road network will be low at this link location during the hours of 07:00-19:00.</p> <p>These effects will be temporary, and only occur during the construction of the Scheme. Chapter 13: Transport and Access, ES Volume 1 [EN010143/APP/6.1] states that there will be no significant effects as a result of the Scheme on transport and access during operation.</p> <p>The Scheme is located in an area that is served by a network of roads, rail and PRow. The Applicant will endeavour to encourage all construction staff to the use of lower carbon modes of transport by identifying and communicating local bus and rail connections and pedestrian and cycle access routes to/from the Scheme and providing appropriate facilities for the safe storage of cycles, as set out in Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1].</p> <p>The Scheme would also include the enhancement of the current PRow network, with the implementation of Permissive Paths, as shown on Figure 2-3, ES Volume 3 [EN010143/APP/6.3].</p> <p>The first proposed permissive path is a continuation of Bridleway SPALB08 which currently terminates at Johnson's Farm (the site of the Operations and</p>

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			<p>Maintenance Hub). This is proposed to also allowing travel on horses in response to feedback from the East Riding of Yorkshire Council's PRow team. The proposed permissive path runs northwards for approximately 340 m until it connects with the second proposed permissive path.</p> <p>The second proposed permissive path runs eastwards from footpath SPALF14, connecting with the first permissive path and continuing eastwards to the edge of the grassland habitat created in the east of Solar PV Area 1e. The path would be approximately 1.4 km in length. From discussions with East Riding of Yorkshire Council PRow Team it is proposed that the section from SPALF14 to the connection with the first permissive path will allow travel on horses.</p> <p>Car parking would be provided on site for construction staff, and would not have any impact on the local road network.</p>
<p>East Riding Local Plan Update 2020-2039</p>	<p>Policy EC5 Supporting the renewable and low carbon energy sector</p>	<p>A. Proposals for the development of the energy sector, excluding mineral extraction, but including all other types of development listed in Table 10, will be supported where any significant adverse impacts are addressed satisfactorily and the residual harm is outweighed by the wider benefits of the</p>	<p>The Scheme will comprise the construction, operation (including maintenance), and decommissioning of a solar photovoltaic (PV) electricity generating facility with a total capacity exceeding 50 megawatts (MW) and export connection to the national grid, at National Grid's Drax Substation.</p>

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		<p>proposal. Developments and their associated infrastructure should be acceptable in terms of:</p> <ol style="list-style-type: none"> 1. The cumulative impact of the proposal with other existing and proposed energy sector developments; 2. The character and sensitivity of landscapes to accommodate energy development, with particular consideration to the identified Important Landscape Areas, as shown on Figure 12. 3. The effects of development on: <ol style="list-style-type: none"> I. local amenity, including noise, air and water quality, traffic, vibration, dust, light (including reflection, glint, glare and shadow flicker), and visual impact; II. biodiversity, geodiversity and nature, particularly in relation to designations, displacement, disturbance and collision and the impact of emissions/contamination; III. the historic environment, including individual and groups of heritage assets above and below ground; IV. telecommunications and other networks; including the need for additional cabling to connect to the National Grid, electromagnetic production and interference, and aeronautical impacts such as on radar systems; V. transport, including the opportunity to use waterways and rail for transportation of 	<p>As set out in the Statement of Need [EN010143/APP/7.1] the Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure and low-carbon electricity both during and beyond the critical 2020s timeframe. Maximising the capacity of generation in the resource-rich, well-connected and technically deliverable proposed location for the Scheme, represents a significant and economically rational step forwards in the fight against the global climate emergency.</p> <p>An Environmental Statement (ES) [EN0101043/APP/6.1] and accompanying Appendices [EN0101043/APP/6.2], Figures [EN0101043/APP/6.3], Non-technical Summary [EN0101043/APP/6.4] and Environment Mitigation and Commitments Register [EN0101043/APP/6.5] have been submitted, which assess any impacts the Scheme may have.</p> <p>The Scheme would not result in any residual significant effects on climate change, cultural heritage, ecology, flood risk, drainage and the water environment, socio-economics and land use, human health, dust and soils. This is set out in the relevant chapters of the ES, Volume 1 [EN010143/APP/6.1].</p>

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		<p>materials and fuel, and the capacity of the road network to accommodate development;</p> <p>VI. increasing the risk of flooding; and</p> <p>VII. the land, including land stability, contamination and soil resources.</p> <p>B. Proposals for onshore wind development will be supported where they repower existing wind turbines or are in an area identified as suitable for wind energy development by a Neighbourhood Plan. Neighbourhood Plans should consider part A of this policy and Figures 9 and 10 when considering what areas are suitable for onshore wind development. Projects will only be consented where it can be proven that adverse effects on the integrity of Habitats sites can meet the requirements of policy ENV4.</p> <p>C. Where appropriate, proposals should include provision for decommissioning at the end of their operational life. Where decommissioning is necessary, the site should be restored, with minimal adverse impact on amenity, landscape and biodiversity, and opportunities taken for enhancement of these features.</p>	<p>The Scheme would result in significant effects to landscape and visual, noise and vibration and transport. However, impacts to noise and vibration and transport would only occur during construction, and there would be no significant effects to these receptors during the operation of the Scheme.</p> <p>Chapter 10: LVIA, ES Volume 1 [EN010143/APP/6.1] provides an assessment of the Schemes impact on character and sensitivity of landscapes with particular consideration to the identified Important Landscape Areas. The Scheme is likely to result in a significant adverse effect on the Howden to Bubwith LCA 5A during Operation Year 1 and Year 15 reducing to not significant during decommissioning. The Scheme is likely to result in a significant adverse effect on the West of Holme on Spalding Moor Farmland LCA 5B during Operation Year 1, with effects reducing to not significant during operation and decommissioning. It is assessed that none of the remaining character areas will experience significant effects at all assessment scenarios.</p> <p>It is considered that the limited landscape and visual effects of the Scheme are clearly and comprehensively outweighed by the benefits of the Scheme in terms of delivering renewable energy infrastructure which is urgently needed in order to</p>

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			<p>create a secure and affordable energy system and to help combat climate change. Therefore, the level of landscape impacts are not considered to be so damaging that they are not offset by the benefits of the Scheme.</p> <p>Agricultural land quality was a key consideration of the site selection process as set out in Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1]. The Scheme is located mostly on lower quality agricultural land, with the majority of the Scheme being on land not classed as Best and Most Versatile (BMV). For the Solar PV Site, 92% of the land used is non BMV land.</p> <p>The vast majority of agricultural land within the Order limits would be available for return to its existing agricultural use following decommissioning of the Scheme. Chapter 15: Soils and Agricultural Land, ES Volume 1 [EN010143/APP/6.1] concludes that a very small amount (0.41 ha) of BMV Subgrade 3a land for tree planting would be permanently removed from agricultural use but would result in an ecological benefit. 8.97 ha of Subgrade 3b would be permanently removed from agricultural use as a result tree and hedge planting and 2 ha as a result of the potential retention of the Grid Connection Substations and associated accesses.</p>

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			<p>In addition, the conversion of arable to grassland during the 40 year operational period has the potential to accrue improvement to soil function over a large area during operation which has a slight beneficial effect.</p> <p>The cumulative impacts of the Scheme with other existing and proposed energy sector developments is set out in chapters 6 – 16, ES Volume 1 [EN010143/APP/6.1] and is summarised in Chapter 17: Cumulative Effects and Interactions, ES Volume 1 [EN010143/APP/6.1].</p> <p>There will not be any new likely significant effects associated with cumulative effects that are not already accounted for by the assessment of the Scheme. An exception is the functional improvement of soil resources that would follow conversion of arable to grassland when considered with the other solar farm proposals in North Yorkshire, which is considered to be moderately beneficial, which is significant.</p> <p>The Scheme includes provision for decommissioning at the end of its operational life. The Framework DEMP [EN010143/APP/7.9] sets out the measures the Scheme would take to ensure that the site is restored, with minimal adverse impact on amenity,</p>

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East Riding Local Plan Update 2020-2039	Policy EC6 Protecting mineral resources	<p>A. Mineral Safeguarding Areas for sand and gravel, crushed rock, limestone, industrial chalk, clay, and silica sand are identified on the Policies Map Update.</p> <p>B. Within or adjacent to Mineral Safeguarding Areas, non-mineral development, which would adversely affect the viability of exploiting the underlying or adjacent deposit in the future, will only be supported where it can be demonstrated that the:</p> <ol style="list-style-type: none"> 1. Underlying or adjacent mineral is of limited economic value; 2. Need for the development outweighs the need to safeguard the mineral deposit; 3. Non-mineral development can take place without preventing the mineral resource from being extracted in the future; 4. Non-mineral development is temporary in nature; or 5. Underlying or adjacent mineral deposit can be extracted prior to the nonmineral development proceeding, or prior extraction of the deposit is not possible. 	<p>landscape and biodiversity, and what opportunities will be taken for enhancement of these features.</p> <p>Small parts in Solar PV Area 1a and 3c and the Grid Connection Corridor are located within the East Riding of Yorkshire’s Minerals Safeguarding Area (MSA) EC6. Chapter 12: Socio economics and land use, ES Volume 1 [EN010143/APP/6.1] and Appendix 12-2 Communications with Minerals Planning Authorities, ES Volume 2 [EN010143/APP/6.2] explain that the impact of the Scheme on minerals was scoped out of the environmental impact assessment in agreement with the East Riding of Yorkshire Council as the Mineral Planning Authority.</p> <p>The mineral deposits will not be permanently sterilised by the Scheme and can be extracted, if required, after its decommissioning which will commence 40 years after the Scheme’s final commissioning. The construction of the Scheme is minimally invasive and would not impact the underlying geology. In addition, due to the flat topography of the Site no significant earthworks are proposed.</p> <p>The Scheme therefore demonstrates accordance with requirement 3 and 4 of this policy as:</p> <ul style="list-style-type: none"> - The Scheme can be constructed, operated and decommissioned without preventing the

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East Riding Local Plan Update 2020-2039	Policy A4 Goole & Humberhead Levels sub area	<p>Plans, strategies and development decisions in the Goole & Humberhead Levels sub area should:</p> <p>B. Economy</p> <p>1. Support appropriate expansion and diversification of the sub area’s key economic sectors, particularly ports and logistics; manufacturing and engineering (including renewable and low carbon energy operations); creative and digital.</p> <p>2. Make the most of the area as a prime location for economic development that takes advantage of its multi-modal transport infrastructure.</p>	<p>mineral resource from being extracted in the future. The location for the Grid Connection Substations that may not be decommissioned is outside the mineral safeguarding area. For the Grid Connection Cable, which may also not be decommissioned, the cable trench is only up to 1.5 m wide and where practicable the route of the Grid Cables will follow field boundaries thereby not preventing the mineral within the MSA being extracted in the future; and</p> <p>The Scheme is temporary in nature being required to decommission 40 years after final commissioning so would not prejudice future extraction.</p> <p>The Scheme is located within the Goole and Humberhead Levels sub area as per this policy, however it would predominantly be located in the north east of this area, in areas of agricultural land away from the settlements of Snaith, Howden and Gilberdyke, and other along the M62 and B1230.</p> <p>The Scheme is not specifically employment development, however it will generate employment as part of its construction.</p> <p>The Scheme would result in 401 net jobs per annum during construction and would contribute to the development of skills needed for the UK’s transition to Net Zero by 2050 and described within the Net</p>

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		<p>3. Support the development of Junction 36 (M62) as a Key Employment Site on the edge of Goole for manufacturing, storage and distribution uses.</p> <p>4. Support the development of an expanded Ozone Industrial Estate at Howden, and the Green Park Business Park at Newport, predominantly for manufacturing, storage and distribution uses.</p> <p>5. Support the role that Gilberdyke Industrial Estate has in contributing to the rural economy.</p> <p>6. Aim to revitalise the town centre of Goole through public realm investment, property improvements and improved connectivity.</p> <p>7. Support initiatives aimed at linking employment opportunities with residential areas of Goole and the wider sub area.</p> <p>8. Encourage value-added, port-related activities and maximise opportunities for intensification and expansion around the sub area's ports and wharves at Goole and Howdendyke.</p> <p>9. Support appropriately located developments aimed at promoting tourism in the sub area, including provision of hotels and the enhancement of Oakhill Country Park.</p> <p>10. Support the decarbonisation of the economy through appropriate energy infrastructure (e.g. grid connection points,</p>	<p>Zero Strategy: Building Back Greener. It is also estimated that the construction of the Scheme would contribute approximately £22.5 million to the national economy, of which £10.1m would likely be within the local area.</p> <p>A Framework Skills, Supply Chain and Employment Plan (FSSCEP) [EN010143/APP/7.15] has been prepared to maximise and pro-actively expand the economic benefits of the Scheme for the local community. The purpose of this is to promote employment and training opportunities associated with the construction and operation of the Scheme. This would include There will be a Requirement in the DCO for the FSSCEP to be developed into a full SSCE plan once the DCO is granted.</p> <p>The Scheme has provided an integrated approach to habitat and species management, as set out in the Framework LEMP [EN010143/APP/7.14] and would provide mitigation to offset the permanent loss of arable land that is functionally linked to the Lower Derwent Valley SPA/Ramsar and Humber Estuary SPA/Ramsar. This mitigation would support habitat for golden plover and pink-footed goose under the operational footprint of the Scheme. A total of 30ha of mitigation habitat will be provided. 15ha of wet grassland will be delivered in the Golden Plover Mitigation Zone adjoining the River Foulness, and</p>

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		<p>pipelines) that integrates with renewable and low energy generating uses</p> <p>C. Environment</p> <ol style="list-style-type: none"> 1. Support integrated approaches to habitat and species management, safeguarding and enhancing designated sites, including the Humber Estuary, Lower Derwent Valley, River Derwent, River Ouse and Thorne, Crowle and Goole Moors and green infrastructure corridors, and avoid development that would have a detrimental impact, working in conjunction with neighbouring authorities where appropriate. 2. Have regard to the character and quality of landmarks, such as the cranes, 'Salt and Pepper Pot' water towers and St. Johns Church in Goole, Howden Minister and Wressle Castle, and respect, and, where possible, enhance views of these features. 3. Conserve and enhance those elements which contribute to the significance of the sub area's heritage assets and their setting, particularly in Howden, and support initiatives to improve the quality of the public realm in Goole, including the revitalisation of the town centre. 4. Ensure the integrity of the Sherwood Sandstone aquifer, and the Pollington and Cowick Groundwater Source Protection Zones, is protected. 	<p>15ha of arable land maintained under a suitable cropping regime and management practices (e.g., longer retention of winter stubbles) will be provided in the Goose Mitigation Zone on a rotational basis. This mitigation would also provide benefits to other species using it. There would therefore be no significant effects to the Lower Derwent Valley and Humber Estuary. Further details are set out in the Habitats Regulation Assessment [EN010143/APP/7.12] and Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1].</p> <p>The Scheme has had regard to the character and quality of Howden Minster and Wressle Castle, and no significant impacts are anticipated on these assets.</p> <p>Section 7.7 of Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] includes an assessment of Howden Conservation Area as part of the consideration of Howden Minster, including the kinetic experience of approaches to and from Howden, and those views which assist in appreciating the location of the town in its wider landscape setting. This detailed consideration concluded that the Solar PV Site did not form an identifiable, or important, element of the setting of the conservation area, and, as such, the presence of the</p>

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		<p>5. Proactively manage the risk of flooding posed from the Humber Estuary and the Rivers Aire, Derwent, Don (Dutch River), Ouse, and Trent, as well as the risk of surface water flooding, having regard where appropriate to the relevant Strategic Flood Risk Assessment and flood risk management plans and strategies.</p> <p>6. Prevent coalescence by protecting the character and individual identity of settlements by maintaining Key Open Areas between Goole and Hook, and Snaith and Cowick.</p> <p>7. Manage improvements to the River Aire, River Ouse, Aire and Calder Navigation and Dutch River where it would create economic, environmental and recreational opportunities, and does not adversely affect conservation initiatives or the quality of the natural environment.</p> <p>D. Community and Infrastructure</p> <p>1. Enhance connectivity within the sub area and with the rest of the East Riding and other important centres, such as Hull, Doncaster and Leeds, by considering a development's impact on transport infrastructure and contributing towards improvement schemes where required, particularly: I. improvements to walking, cycling and public transport facilities, including those set out within the Local Transport Plan Local</p>	<p>operational Scheme would constitute no impact resulting in no effect.</p> <p>The risk of flooding posed from the Humber Estuary and River Derwent and River Ouse have been considered as part of the Scheme's design. Measures to protect the Scheme against flood risk, and ensure that the Scheme does not cause any flood risk elsewhere are addressed in Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 [EN010143/APP/6.1] and the Design and Access Statement [EN010143/APP/7.3].</p> <p>A Flood Risk Assessment (Appendix 9-3, ES Volume 2 [EN010143/APP/6.2]) is provided which has regard to the relevant strategic flood risk assessment and flood risk management plan and strategies.</p> <p>Two new Permissive Paths are proposed as part of the Scheme, however these are not located within this sub area.</p>

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		<p>Cycling and Walking Infrastructure Plans and major cross country routes, such as the Transpennine Trail, the Public Right of Way network, and the National Cycle Network;</p> <p>II. M62 Junction 36 Interchange improvements;</p> <p>III. M62 Junction 37 improvements;</p> <p>IV. improved facilities and railway freight capacity at the port of Goole; and</p> <p>V. improvements in and around the level crossing in Goole town centre. and</p> <p>vi. improvements that link the key area of growth to the north of Howden with the rest of the town and other locations in the sub area such as Goole.</p> <p>vi. provision of a new primary school in Howden.</p> <p>2. Support the provision of additional infrastructure, including:</p> <p>I. primary health care capacity, including dentists across the sub area;</p> <p>ii. district heat networks, particularly as part of large commercial developments;</p> <p>iii. drainage and flood alleviation schemes, particularly for Goole;</p> <p>iv. additional secondary school pupil capacity and post-16 education capacity in the Goole and Howden School areas; and</p> <p>v. additional capacity for special educational needs (SEN) and early years education.</p>	

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East Riding Local Plan Update 2020-2039	Policy ENV1 Integrating high quality design	<p>A. All development proposals will:</p> <ol style="list-style-type: none"> 1. Contribute to safeguarding and respecting the diverse character and appearance of the area through their design, layout, construction and use; and 2. Seek to minimise the demand for energy and make prudent and efficient use of natural resources, particularly land, energy and water; and 3. Seek to maximise the use of decentralised and renewable or low carbon technologies. <p>B. Development will be supported where it achieves a high quality of design that optimises the potential of the site and contributes to a sense of place and beauty. This will be accomplished by:</p> <ol style="list-style-type: none"> 1. Having regard to the specific characteristics of the site’s wider context and the character of the surrounding area; 2. Incorporating an appropriate mix of uses on the site; 3. Having an appropriate scale, density, massing, height and material; 4. Having regard to the amenity of existing or proposed properties; 5. Having regard to the potential impact of a proposal on existing uses in the surrounding area; 	<p>The Design and Access Statement [EN010143/APP/7.3] and the Outline Design Principles Statement [EN010143/APP/7.4] set out details of the Scheme design. Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1] sets out how the design has evolved throughout the project.</p> <p>As detailed in section 6 of this Planning Statement [EN010143/APP/7.2] the Scheme has been informed by a detailed and sensitive iterative design process. This has involved taking account of the context and features of the land within the Order limits, sensitive receptors, information from environmental surveys and feedback from stakeholders. The design also takes into account the constraints and opportunities in order to develop a good design that balances the need to maximise renewable energy generation from the Scheme along with the minimisation of potential impacts or provision of mitigation and environmental enhancements where practicable.</p> <p>The Design and Access Statement [EN010143/APP/7.3] sets out the objectives that the Scheme has worked towards throughout its design. These have ensured that the Scheme design:</p> <ol style="list-style-type: none"> a. Seeks to efficiently generate a large amount of renewable energy for supply

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		<p>6. Ensuring the proposal does not result in unreasonable restrictions being placed on existing uses</p> <p>7. Having an adaptable layout for sites and/or buildings that takes into account the needs of future users;</p> <p>8. Having regard to healthy lifestyles;</p> <p>9. Incorporating energy efficient design and arrangements to manage waste;</p> <p>10. Incorporating hard and/or soft landscaping, alongside boundary treatment of an appropriate scale and size, to enhance the setting of buildings, public space and views;</p> <p>11. Promoting equality of safe access, movement and use, including minimising highway safety risks. Considering the potential for public transport and active forms of travel in the layout of streets and paths within in new development;</p> <p>12. Having regard to features that minimise crime and the perception of crime;</p> <p>13. Considering the use of public art, where the sense of place and public access or view would justify it;</p> <p>14. Ensuring infrastructure, including green infrastructure, drainage, SuDS and flood mitigation, are well integrated into the development;;</p>	<p>to the National Electricity Transmission System supporting the delivery of the Government’s objectives and commitments for the development of a secure, affordable and low carbon energy system.</p> <p>b. Is sensitively integrated into its landscape setting, to avoid and minimise adverse landscape and visual effects as far as practicable.</p> <p>c. Has sought opportunities to enhance existing biodiversity through the creation of new green infrastructure and create new habitat for wildlife to achieve Biodiversity Net Gain.</p> <p>d. Responds sensitively to its proximity to residential dwellings, settlements and PRow with regard to visual impact, noise and lighting.</p> <p>e. Safeguards the water environment, be resilient from flooding both now and in the future and not increase the risk of flooding elsewhere.</p> <p>f. Is sensitive to heritage assets and their setting where practicable.</p> <p>g. Enhances, where practicable, the existing network of PRow to improve accessibility.</p>

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		<p>15. Ensuring infrastructure, including green infrastructure, drainage, SuDS and flood mitigation, are well integrated into the development;</p> <p>16 Incorporating, nature conservation and biodiversity net gain into the proposal;</p> <p>17. Incorporating, where appropriate, a reduction in the vulnerability and increase in resilience to climate change;</p> <p>18. Considering the use of the latest technologies and materials to improve building quality;</p> <p>19. Considering the appropriate use of local materials, architectural styles and features that have a strong association with the area’s landscape, geology and built form, with particular attention to heritage assets; and</p> <p>20. Safeguarding the views and setting of outstanding built and natural features and skylines within and adjoining the East Riding, including those features identified in Policies A1-A6.</p> <p>C. Innovative design incorporating new materials and technologies will be supported where the local context and sub areas, with their diverse landscapes, geologies, historical background and built form, have been fully considered as part of the design process.</p>	<p>h. Is sensitive to the existing land quality and its resources and other land uses.</p> <p>i. Provides safe access and where practicable will not significantly impact the local highway network.</p> <p>By achieving these objectives, the Scheme design meets the criteria that is set out in this policy.</p>

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East Riding Local Plan Update 2020-2039	Policy ENV2 Promoting a high quality landscape	<p>A. Development proposals should be sensitively integrated into the existing landscape, demonstrate an understanding of the intrinsic qualities of the landscape setting and, where possible, seek to make the most of the opportunities to protect and enhance landscape characteristics and features. To achieve this, development should:</p> <ol style="list-style-type: none"> 1. Protect the character and individual identity of settlements by maintaining their physical separation, including through the maintenance of the Key Open Areas identified in Policies A1-A6, where there is a risk of settlement coalescence. 2. Protect and enhance important open spaces within settlements which contribute to their character. 3. Ensure important hedgerows and trees are retained unless their removal can be justified in the wider public interest. Where important hedgerows and trees are lost replacements will usually be required on-site. 4. Maintain or enhance the character and management of woodland where appropriate. 5. Retain, not detract from, and enhance wetland and water feature characteristics. 6. Protect and enhance views across valued landscape features, including flood meadows, 	<p>The Landscape and Visual Impact Assessment undertaken in Chapter 10: Landscape and Visual Impact, ES Volume 1 [EN010143/APP/6.1] has informed the iterative design process, guided by design principles and in response to policy requirements, published landscape character assessment guidance and fieldwork analysis.</p> <p>The overall objective of the landscape design is to integrate the Scheme into its landscape setting and avoid or minimise adverse landscape and visual effects as far as practicable.</p> <p>The Scheme would not have any impacts to Key Open Areas between Goole and Hook, and Snaith and Cowick as identified in Policy A4. Policies A1, A2, A3, A5, and A6 are not relevant to the Scheme.</p> <p>The Scheme minimises the loss of, and avoids significant impacts on, existing hedgerows and trees, where practicable. This includes minimum offsets of:</p> <ol style="list-style-type: none"> a. 15 m from woodlands; b. 10 m from hedgerows increasing to 15 m where there are hedgerow trees; c. 15 m from individual trees; <p>Chapter 8: Ecology, ES Volume 1 [EN101043/APP/6.1] concludes that there would be</p>

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		<p>chalk grassland, lowland heath, mudflats and salt marsh, sand dunes and chalk cliffs.</p> <p>7. Protect and enhance the undeveloped coast.</p> <p>B. Proposals should protect and enhance the existing landscape character as described in the East Riding Landscape Character Assessment, in particular, within the following Important Landscape Areas as shown on the Draft Policies Map Update:</p> <ol style="list-style-type: none"> 1. The Yorkshire Wolds, with special attention to ensuring developments are of an appropriately high quality and will not adversely affect the historic and special character, appearance or conservation value. 2. The Heritage Coast designations at Flamborough and Spurn Head, ensuring that proposals are compatible with their special character. 3. The River Derwent Corridor and Lower Derwent Valley, which includes the Pocklington Canal. 4. The Thorne, Crowle and Goole Moors <p>C. Proposals should have regard to the existing historic character as described in the Historic Landscape Characterisation of the East Riding of Yorkshire and Kingston Upon Hull.</p>	<p>no loss of ancient woodland, or veteran or ancient trees as a result of the Scheme. There would be no loss of semi-natural woodland required, and Root Protection Area incursions can be managed so that there will be no detrimental impacts on the health or amenity of retained trees. No plantation woodland that is mapped as Priority woodland will be lost during construction of the Scheme.</p> <p>Some tree and hedgerow removal will be required to facilitate construction of the Scheme, as detailed in Appendix 10-5: Arboricultural Impact Assessment and Tree Protection Report, ES Volume 2 [EN010143/APP/6.2]. Tree loss will be mitigated with a robust and high quality scheme of new tree planting as detailed in the Framework LEMP [EN010143/APP/7.14]. As such, there is not anticipated to be any significant effects to hedgerows and trees.</p> <p>The final level of arboricultural impacts and requirement for pruning will be reviewed and identified at the detailed design stage and will be confirmed in an Arboricultural Method Statement as part of the CEMP secured by a requirement in the DCO. This is a commitment in the Framework CEMP [EN01043/APP/7.7].</p>

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			<p>The Scheme includes habitat enhancement through the creation of water meadow habitat along the river floodplain within the area of habitat enhancement east of Solar PV 1e, and the eastern part of the Ecology Mitigation Area to provide habitat for invertebrates, mammals and birds, suitable for being managed by grazing in the long term.</p> <p>As noted above, the Scheme is likely to result in a significant adverse effect on the Howden to Bubwith LCA 5A during Operation Year 1 and Year 15 reducing to not significant during decommissioning. The Scheme is likely to result in a significant adverse effect on the West of Holme on Spalding Moor Farmland LCA 5B during Operation Year 1, with effects reducing to not significant during operation and decommissioning. It is assessed that none of the remaining character areas will experience significant effects at all assessment scenarios.</p> <p>It is considered that the limited landscape and visual effects of the Scheme are clearly and comprehensively outweighed by the benefits of the Scheme in terms of delivering renewable energy infrastructure which is urgently needed in order to create a secure and affordable energy system and to help combat climate change. Therefore, the level of landscape impacts are not considered to be so</p>

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East Riding Local Plan Update 2020-2039	Policy ENV3 Valuing our heritage	Proposals that positively and proactively conserve and enhance the East Riding's Historic Environment and heritage assets will be supported. This Historic Environment reinforces local distinctiveness, helps create a sense of place and can assist in the delivery of the economic wellbeing of the area. Key features that contribute to the East Riding's distinctive historic character, include, but are not limited to: 1. Those elements that contribute to the special interest of Conservation Areas, including the landscape setting, open spaces,	<p>damaging that they are not offset by the benefits of the Scheme.</p> <p>There is no visibility from the Yorkshire Wolds NCA to the Scheme.</p> <p>For the Derwent Valley, Barmby on the March to Pocklington Canal Reach, it is assessed that there would be no change to landscape characteristics in comparison with the baseline as a result of the Scheme.</p> <p>The Scheme's design has had regard to the existing historic character as set out in Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1], and the Design and Access Statement [EN010143/APP/7.3].</p> <p>Chapter 7, Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] and its supporting appendices [EN010143/APP/6.2] provide an assessment of the likely effects of the Scheme upon heritage assets, including a description of the significance of the heritage assets. Regard is given to the HER.</p> <p>Section 7.6 of Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] outlines the avoidance and mitigation measures embedded within the Scheme design in relation to cultural heritage.</p>

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		<p>key views and vistas, and important unlisted buildings identified as contributing to the significance of each Conservation Area in its appraisal;</p> <ol style="list-style-type: none"> 2. Listed Buildings and their settings; 3. Scheduled Monuments; 4. Historic Parks and Gardens and key views in and out of these landscapes; 5. The dominance of the church towers and spires as one of the defining features of the landscape, such as those of Holderness and the Wolds; 6. Heritage assets associated with the historic development and defence of the East Yorkshire Coast and the foreshore of the Humber Estuary; 7. The historic, archaeological and landscape interest of the Registered Battlefield at Stamford Bridge; 8. The historic cores of medieval settlements, and, surviving former medieval open field systems with ridge and furrow cultivation patterns or garth plots; 9. The nationally significant archaeology of the Yorkshire Wolds; and 10. Those parts of the nationally important wetlands where waterlogged archaeological deposits survive. 	<p>It sets out that physical impacts to known heritage assets within the Order limits have been avoided by the Scheme design, where practicable. This includes the avoidance of the moated site east of Gribthorpe (MHU3206), a non designated heritage asset.</p> <p>The planning of construction and decommissioning traffic routes and modes of transport have sought to reduce impacts to numerous receptors, including the town of Howden.</p> <p>The Order limits have been designed to avoid or minimise potential changes to the setting of designated heritage assets, including Grade I, Grade II* and Grade II listed buildings.</p> <p>Mitigation also includes the careful siting of the construction compounds within the Solar PV Areas and the chosen colour palette for above-ground components, which will be green to reflect the prevailing landscape.</p> <p>As set out in the Framework LEMP [EN010143/APP/7.14], the Scheme would include management of existing woodland and hedgerows (including important hedgerows) to ensure historic boundaries are protected, whilst also increasing the level of screening from visual receptors.</p> <p>Furthermore, the nature of the landscape, comprising many hedgerow boundaries and areas of tree</p>

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		<p>B In determining applications, proposals that conserve or enhance the significance of a heritage asset and its setting should be supported. Development that will cause harm to the significance of a heritage asset will only be granted where clear and convincing justification for the proposed harm can be demonstrated in line with national planning policy requirements. Where harm cannot be avoided the applicant will need to prepare a scheme that minimises and mitigates the harm caused by development and demonstrate that the harm is appropriately weighed against public benefits in accordance with national policy</p> <p>C Proposals that would retain, and enhance the significance of a non-designated heritage asset, or its contribution to the character of a place will be supported where it is in accordance with national planning policy.</p> <p>D. Proposals which seek to safeguard the future of designated heritage assets at risk, including putting them to an appropriate, viable and sustainable use and conserve their significance will be supported where it is in accordance with national planning policy. Proposals situated within a conservation area, or that impact a heritage asset (including setting) should be accompanied by a heritage</p>	<p>planting, and restricted views of the land within the Order limits reduces the potential for heritage assets to experience change as a result of the Scheme's construction.</p> <p>Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] and the Heritage Statement (Appendix D of this Planning Statement [EN010143/APP/7.2]) concludes that there will be no residual significant effect on designated heritage assets or their setting as a result of the Scheme, and the Scheme would not lead to any loss or substantial harm to any designated heritage assets. This includes listed buildings, registered parks and gardens, conservations areas or scheduled monuments.</p> <p>Section 7.7 of Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] includes an assessment of Howden Conservation Area as part of the consideration of Howden Minster, including the kinetic experience of approaches to and from Howden, and those views which assist in appreciating the location of the town in its wider landscape setting. This detailed consideration concluded that the Solar PV Site did not form an identifiable, or important, element of the setting of the conservation area, and, as such, the presence of the</p>

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		<p>statement; proportionate to the asset’s significance. Additionally, development proposals which have archaeological potential should include a desk based assessment and evaluation report with their planning application.</p> <p>F. Considerable weight will be given to the preservation and protection of archaeological remains, particularly scheduled monuments where substantial harm should be wholly exceptional. To minimise conflict and ensure mitigation of damage, preservation of the remains in situ is the preferred solution. However where the significance of archaeological remains is such that their preservation in situ is not essential, and is not feasible, a written scheme of investigation and programme of archaeological works aimed at achieving preservation by record will be required to be submitted to and agreed with the local planning authority</p>	<p>operational Scheme would constitute no impact resulting in no effect.</p> <p>Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1] concludes that the Scheme would result in significant effects to eight non-designated heritage assets. These comprise of Hagthorpe moated site, which is a non-designated asset of schedulable quality, the historic farmstead at Johnson’s Far, and six archaeological assets (six areas of Romano-British settlement archaeology). Therefore, additional mitigation in the form of a programme of archaeological excavation and recording is proposed, and will be set out in an Overarching Written Scheme of Investigation for Archaeological Mitigation.</p> <p>It is acknowledged that while archaeological excavation and recording would not minimise the physical impact to these assets, as the archaeological evidence would still be removed, it would compensate for their loss by preserving them by record; thereby allowing their continued study and achieving greater understanding and appreciation of their heritage value. This would reduce the magnitude of impact on individual assets, resulting in a residual minor adverse effect, which is not significant.</p>

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East Riding Local Plan Update 2020-2039	Policy ENV4 International, National and Local Sites of Importance for Biodiversity	<p>A. Proposals that are likely to have a significant effect on an International Site will be considered in the context of the statutory protection which is afforded to the site.</p> <p>b. Development should follow the mitigation hierarchy to first avoid, then mitigate, and where necessary compensate for loss or harm to biodiversity. Where loss or harm to a national or local designated site, as set out in Table 13, cannot be avoided, or adequately mitigated, as a last resort compensation for the loss/harm must be agreed. Development will be refused if loss or significant harm cannot be avoided, adequately mitigated or compensated for.</p> <p>International (Habitats) sites</p> <p>c. Applicants will be required to submit appropriate levels of evidence to enable the Council to undertake a Habitats Regulations Assessment (HRA) of the proposal. Evidence will be required to assess the proposal's potential impact (alone or in combination) in view of the international (habitats) site's conservation objectives. This evidence should</p>	<p>The effects above are outweighed by the very significant public benefits of the Scheme which are set out in section 5.3 of this Planning Statement [EN010143/APP/7.2], when considered in isolation and cumulatively with other adverse effects of the Scheme.</p>
			<p>The Scheme would not have any significant effects on any international sites. It would also not have any significant effects on any national site.</p>
			<p>As set out in Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] the Scheme design has evolved to avoid statutorily designated sites where practicable. Measures embedded within the Scheme design ensure that statutory designated sites are not impacted during construction, operation or decommissioning (e.g., through siting construction routes away from designated sites where practicable, incorporating suitable buffer zones and erection of temporary construction fencing to avoid incursion into exclusion zones).</p>
			<p>The Scheme has been designed with the view to avoid key nature conservation and ecological features present within or adjacent to the Site as far as practicable, in line with the mitigation hierarchy. Accordingly, the following minimum buffers from key habitat features have been applied where practicable</p>

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		<p>include the following potential impacts that proposals need to consider: Recreational Pressure 1. The potential impact of recreational pressure on international (habitats) sites should be considered in proximity to sensitive sites. Proposals for residential and/or tourism accommodation in the following key sensitive locations should; i. in the Humber recreational pressure zone of influence, consider contributing towards strategic programmes aimed at managing the impact of residents and tourists on international (habitats) sites (see Figure 13); ii. avoid development within the Spurn recreational pressure zone of influence shown on the policies map. Proposals for 'roll back' in this zone will have to provide appropriate mitigation to rule out adverse effects on the integrity of international (habitats) sites; iii. consider the impact of recreational pressure when located within 5km of the Lower Derwent Valley international (habitats) sites; and iv. consider the impact of recreational pressure on Flamborough Head international (habitats) sites. Functionally Linked Land 2. Development proposals located within proximity of either the Humber Estuary or Lower Derwent Valley international (habitats)</p>	<p>(e.g., some features such as hedgerows and waterbodies will be crossed):</p> <ol style="list-style-type: none"> a. 15m from woodlands (some cabling will lie within 15m of woodland); b. 10m from hedgerows increasing to 15m where there are hedgerow trees; c. 15m from individual trees; d. a minimum of 10m from watercourses (bank top) and ponds, to protect riparian habitats and to mitigate for potential hazards such as chemical and soils spills into watercourses/ waterbodies. This buffer is extended to at least 30m for the River Derwent, River Ouse and Watercourse DE53. <p>The Scheme includes mitigation to be delivered to offset the permanent loss of arable land that is functionally linked to the Lower Derwent Valley SPA/Ramsar and Humber Estuary SPA/Ramsar, with abundances of qualifying species (i.e., golden plover and pink-footed goose), reaching or approaching the 1% population threshold. Mitigation would provide supporting habitat for golden plover and pink-footed goose under the operational footprint of the Scheme, and it is therefore concluded that the Scheme would not result in any significant adverse effects on these international sites.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>sites will have to consider whether development results in the loss of ‘functionally linked land’ for mobile species associated with the international (habitats) site. This proximity consideration applies where the application site; is either:</p> <ul style="list-style-type: none"> i. greater than 2 hectares as a site or as part of a wider plot, field or open area within 2km of any part of the designated sites; or; if greater than 2 hectares as a site or as part of a wider plot, field or open area between 2km and 10km of any part of the designated sites. <p>3. Development proposals located within 3km of Thorne and Hatfield Moors international (habitats) sites, which impact habitats nightjars may use for feeding, will only be supported where they deliver a net gain in nightjar foraging habitat.</p> <p>4. Where land is identified as functionally linked land, mitigation land that can perform the same function in a suitable location may be required to mitigate adverse effects.</p> <p>Air Quality</p> <p>5. Proposals emitting air pollutants must rule out adverse effects on the integrity of international (habitats) sites.</p> <p>Water Quality</p> <p>6. Proposals discharging water pollutants, such as Nitrates and Phosphates, must rule out</p>	<p>A Habitat Regulations Assessment [EN010143/APP/7.12] has been submitted with this Application, which sets out further detail on the effects and mitigation relating to the Lower Derwent Valley SPA/Ramsar and Humber Estuary SPA/Ramsar.</p> <p>The Scheme does not include proposals for residential and/or tourism accommodation.</p> <p>As a result of the above mitigation, and measures outlined in the Framework CEMP [EN010143/APP/7.7], Framework OEMP [EN010143/APP/7.8] and Framework DEMP [EN010143/APP/7.9], no significant effects are anticipated on the Lower Derwent Valley SPA/Ramsar and Humber Estuary SPA/Ramsar as a result of air pollution, or water pollution from the Scheme.</p> <p>As set out in Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] there are two non-statutory sites of nature conservation within the Order limits. These comprise Tottering Lane, Gribthorpe Local Wildlife Site (LWS) and Wressle Verge LWS.</p> <p>To limit disturbance to habitat inside these LWS during construction, the working area for the cable installation across the verges will be kept to a minimum of 5m width inside the LWSs and no spoil,</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>adverse effects on the integrity of international (habitats) sites.</p> <p>7. Proposals that discharge foul or surface water into Hornsea Mere’s international (habitats) site hydrological catchment will have to demonstrate that foul and surface water can be appropriately addressed so that developments are nutrient neutral. Contaminants should be restricted from entering the Mere’s hydrological system.</p> <p>D. Mitigation will be required for a development site where adverse effects cannot be ruled out. Where mitigation is not possible to rule out adverse effects on the integrity of an international (habitats) site, the development will not be permitted unless it can be conclusively demonstrated that:</p> <ol style="list-style-type: none"> 1. There are no feasible alternative solutions that would be less damaging or avoid damage to the site; 2. There are imperative reasons of overriding public interest for the development; and 3. The necessary compensatory measures can be secured. <p>E. Sites that have been identified for mitigation or compensatory land are shown on the Policies Map and will be protected for the purposes for which they have been identified. National</p>	<p>materials or vehicles will be stored within the LWS. Once the cable(s) have been installed, the removed turfs and soil from the LWS (stored separately to that of adjacent fields) will be backfilled and replaced promptly, retaining the original topsoil and seed bank. Hedgerows would be retained and appropriate measures (e.g., fencing and signage) will ensure no encroachment into the LWSs, outside of the required working areas.</p> <p>Vegetation clearance will be required for provision of the new and modified existing access tracks across the LWSs. The replacement of the hedgerows and retention of the verge turfs relating to this work has been included within the landscape design (as presented in the Framework LEMP [EN010143/APP/7.14]).</p> <p>Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] states that where temporary habitat loss is unavoidable, reinstatement will be undertaken after construction where practicable. Large areas of grassland creation is included within the landscape design throughout the Solar PV Areas, both around the solar PV panels and in the field margins of each field. These can be managed towards LWS criteria.</p> <p>Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] with the implementation of</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>F. Proposals that are likely to have an adverse effect on a national site (alone or in combination) will not normally be permitted, except where the benefits of development in that location clearly outweigh both the impact on the site and any broader impacts on the wider network of national sites. This should consider adverse impacts such as recreational pressure, functionally linked land, air quality, and water quality.</p> <p>Local</p> <p>G. Development resulting in loss or significant harm to a local site, or habitats or species supported by local sites, whether directly or indirectly, will only be supported if it can be demonstrated that there is a need for the development in that location and the benefit of the development outweighs the loss or harm</p>	<p>embedded mitigation, there would be no significant adverse effects on local or regional biodiversity sites as a result of construction, operation or decommissioning of the Scheme.</p>
<p>East Riding Local Plan Update 2020-2039</p>	<p>Policy ENV5 Enhancing biodiversity and geodiversity</p>	<p>A. Proposals will be supported where they:</p> <ol style="list-style-type: none"> 1. Conserve, restore, enhance or recreate biodiversity and geological interests including priority habitats and species, irreplicable habitats and Local Sites (identified in Table 13); and 2. Safeguard, enhance, create and connect habitat networks in order to: <ol style="list-style-type: none"> i. protect, strengthen and reduce fragmentation of habitats; 	<p>The Applicant is committed to exceeding the Government’s 10% target for biodiversity net gain as set out in the Environment Act 2021. A Biodiversity Net Gain (BNG) report [EN010143/APP/7.11] using Natural England’s Biodiversity Metric 4.0, has been produced for the DCO Application. This report demonstrates that the Scheme has the potential to deliver significant biodiversity net gain on the Site, with 80% gain predicted for habitat biodiversity units.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>ii. create a coherent ecological network that is resilient to current and future pressures;</p> <p>iii. conserve and increase populations of species; and</p> <p>iv. promote and enhance green infrastructure.</p> <p>Local Nature Recovery</p> <p>B. Proposals should further the aims of the Local Nature Recovery Strategy and national Nature Recovery Network and other relevant strategic landscape-scale biodiversity initiatives.</p> <p>Biodiversity Net Gain</p> <p>C. Proposals must achieve a measurable biodiversity net gain at least in line with the most up to date national requirements, in addition to the measures required in ENV4.</p> <p>Water Framework Directive</p> <p>D. Proposals that include altering river channels, lakes, estuaries, coastal waters, or their banks, propose structures that break continuity or alter flow, or EIA developments that are determined to have a likely significant effect on the water environment, must undertake a Water Framework Directive Assessment to show that the proposal will:</p> <p>1. Not cause deterioration of the Water Framework Directive status of any water body; and</p>	<p>Details of the ecological mitigation and enhancement measures that form part of the Scheme are included in Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1] and the Framework LEMP [EN010143/APP/7.14].</p> <p>The Scheme would support this policy through the provision of new green infrastructure elements and corridor throughout the Solar PV Site, to increase habitat connectivity, enhance landscape condition and improve visual amenity within sometimes degraded agricultural landscapes.</p> <p>Green infrastructure includes provision of species rich grassland, woodland and hedgerow habitats throughout the Site, as mitigation but which will also enhance ecological connectivity and habitat. New woodland and shelter belts would provide increased structure, ecological connectivity, and interest within the landscape. And new scrub, woodland edge, and associated mosaic habitats, some of which may be allowed to develop through natural regeneration would be of value to breeding birds and other wildlife. New native species rich hedgerows with hedgerow trees would be provided as mitigation and to provide ecological connectivity.</p> <p>The Scheme would also include the enhancement of the current PRow network of which two indicative</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		2. Will not prevent any water body from reaching targets set in the River Basin Management Plan	<p>routes are shown on Figure 2-3, ES Volume 3 [EN010143/APP/6.3].</p> <p>The first proposed permissive path is a continuation of Bridleway SPALB08 which currently terminates at Johnson's Farm (the site of the Operations and Maintenance Hub). This is proposed to also allowing travel on horses in response to feedback from the East Riding of Yorkshire Council's PRow team. The proposed permissive path runs northwards for approximately 340 m until it connects with the second proposed permissive path.</p> <p>The second proposed permissive path runs eastwards from footpath SPALF14, connecting with the first permissive path and continuing eastwards to the edge of the grassland habitat created in the east of Solar PV Area 1e. The path would be approximately 1.4 km in length. From discussions with East Riding of Yorkshire Council's PRow Team it is proposed that the section from SPALF14 to the connection with the first permissive path will allow travel on horses.</p> <p>Perimeters would be planted with species-rich grassland or flower rich grassland (Solar PV area 2f) and clumps of low-growing native woodland edge to break up channelled views created by the proposed Solar PV fencing, and new native hedgerows with</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
East Riding Local Plan Update 2022-2039	Policy ENV6 Managing environmental hazards	A. Environmental hazards, such as flood risk, coastal change, nutrient deposition, aerial pollution, groundwater pollution and other forms of pollution, will be managed to ensure that development does not result in unacceptable consequences to its users, the wider community, and the environment. Flood risk	<p>trees are proposed along the Howden 20 Route and PRow BUBWF10.</p> <p>The Scheme comprises a buffer of a minimum of 10m from watercourses (bank top) and ponds (except in a small number of cases for ponds where the full 10m is not feasible), to protect riparian habitats and to mitigate for potential hazards such as chemical and soils spills into watercourses/ waterbodies. This buffer is extended to at least 30m for the River Derwent, River Ouse and Watercourse DE53.</p> <p>Appendix 9-2 of ES Volume 2 [EN010143/APP/6.2] includes a Water Framework Directive (WFD) Assessment, which assesses impacts on water bodies or protected areas under the WFD and SPZs.</p> <p>The Scheme would not prevent any water body from reaching targets set in the River Basin Management Plan.</p>
			<p>A FRA is provided at Appendix 9-3, ES Volume 2 [EN01043/APP/6.2]. This demonstrates how the development passes the Sequential Test including its application at the site level. The Sequential Test has considered East Riding of Yorkshire’s Strategic Flood Risk Assessment (SFRA) and the Environment</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>B. The risk of flooding to development, from all sources both now and in the future, will be managed by applying a sequential test to ensure that development is steered towards areas of lowest risk, as far as possible. The sequential test will, in the first instance, be undertaken on the basis of the East Riding Strategic Flood Risk Assessments (SFRA) and the Environment Agency's Flood Map, within appropriate search areas. Where development cannot be steered away from Flood Zone 3, the sub-delineation of Zone 3, detailed within the relevant SFRA, will be used to apply the sequential test, with preference given to reasonably available sites that are in the lower risk/hazard zones. Where necessary, development must also satisfy the exception test.</p> <p>C. If, following application of the sequential test, it has not been possible to successfully steer development to a site at low risk of flooding from all sources now and in the future, a sequential approach will be taken to site layout and design, aiming to steer the most vulnerable uses towards the lowest risk parts of the site and upper floors.</p> <p>D. Flood risk will be proactively managed by:</p> <ol style="list-style-type: none"> 1. Ensuring that new developments: 	<p>Agency's Flood Map, within appropriate search areas.</p> <p>The majority of the Solar PV Site is located within Flood Zone 1 (lowest risk of fluvial flooding). However, the Solar PV Site also includes Solar PV Areas wholly within Flood Zone 2 (medium risk of fluvial flooding) and limited areas of Flood Zone 3 (high risk). There are small areas of ground water flooding susceptibility and surface water flooding risk also within the Solar PV Site. Given the risk of flooding within the Solar PV Site, the Sequential Test is required to be demonstrated.</p> <p>The Sequential Test Report appended to the FRA [EN010143/APP/6.2], sets out the assessment undertaken as part of the Sequential Test. It concludes that it is considered that no alternative sites are considered appropriate or reasonably available for the Scheme. Therefore, the Scheme satisfies the Sequential Test.</p> <p>The majority of the Grid Connection Corridor is located within high and medium risk of fluvial flooding (Flood zone 2 and 3). As set out in Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1], the majority of the land around the point of connection is flood zone 2 or 3 and as such there are no reasonable alternative routes for the Grid Connection Corridor outside of Flood Zone 2</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>I. limit surface water run-off to existing run-off rates on greenfield sites, and on previously developed land reduce existing run-off rates by a minimum of 30%, or to greenfield run-off rate;</p> <p>II. do not increase flood risk within or beyond the site;</p> <p>III. incorporate Sustainable Drainage Systems (SuDS) into major development proposals and proposals at risk of flooding, unless demonstrated to be inappropriate;</p> <p>IV. do not culvert or otherwise build over watercourses, unless supported by the Risk Management Authority;</p> <p>V. have a safe access/egress route from/to Flood Zone 1 or establish that it will be safe to seek refuge at a place of safety within a development;</p> <p>VI. incorporate high levels of flood resistant and resilient design if located in a flood risk area;</p> <p>VII. are adequately set-back from all watercourses including culverted stretches; and</p> <p>VIII. adhere to other relevant SFRA recommendations.</p> <p>2. Supporting proposals for sustainable flood risk management, including the creation of new and/or improved flood defences, water storage areas and other schemes, provided they would not cause unacceptable adverse environmental, social, or economic impacts.</p>	<p>and 3. Because of this, and the small number of solar PV infrastructure also proposed in Flood Zone 3, it is therefore necessary to apply the Exception Test.</p> <p>The Scheme will provide wider sustainability benefits by contributing to energy security, affordability and helping to achieve the government targets for Net Zero, which outweigh flood risk, and appropriate mitigation has been considered to ensure that the Scheme remains operational and is safe during times of flooding. It has therefore been demonstrated that the Exception Test has been met.</p> <p>The risk of surface water flooding to the majority of the Solar PV Site and Interconnecting Cable Corridor is considered to be 'very low'. There are a few areas where the risk is higher but these generally cover a small spatial extent. A Framework Surface Water Drainage Strategy Appendix 9-4, ES Volume 2 [EN010143/APP/6.2] incorporating SuDS has been prepared to manage these flow paths to ensure that the development remains safe throughout its lifetime.</p> <p>The FRA details embedded mitigation measures alongside the Framework Surface Water Drainage Strategy, Appendix 9-4 of Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 2 [EN010143/APP/6.2], to ensure that the project is appropriately flood resilient and resistant. The</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>3. Supporting the removal of existing culverting and returning these sections to open watercourse.</p> <p>4. Designating areas of Flood Zone 3b (Functional Floodplain) and safeguarding land for current and future flood risk management, on the Policies Map Update.</p> <p>Groundwater pollution</p> <p>H. The risk of groundwater pollution will be managed by:</p> <ol style="list-style-type: none"> 1. Avoiding development that will increase the risk of pollution in source protection zones (SPZ) and where this is not possible, ensuring that appropriate mitigation measures are employed; 2. Supporting developments which will decrease the risk of pollution in SPZs by cleaning up contaminated land and incorporating pollution-prevention measures; 3. Preventing inappropriate uses/activities in SPZ1 and SPZ2, unless adequate safeguards against possible contamination can be agreed; 4. Preventing non-mains drainage that would involve sewage, trade effluent or other contaminated discharges, as far as possible; and 5. Ensuring re-development of previously developed sites does not contaminate underlying aquifers. 	<p>Framework CEMP [EN010143/APP/7.7] includes measures such as safe access and escape routes where required and ensures that any residual risk can be safely managed over the lifetime of the development.</p> <p>There would be no new culverts as part of the Scheme, but existing culverts may be upgraded or slightly extended.</p> <p>There are no SPZ within the Solar PV Site, and only a small area of SPZ 1 – Inner Catchment, located near Blackwood Hall Farms at the western extent of the Study Area from Solar PV Area 1a. As no change is expected to occur to groundwater levels and therefore groundwater abstractions, there would be no significant effect to the unused PWS and to the SPZ in the Study Area.</p> <p>The Design and Access Statement [EN010143/APP/7.3] sets out details of how the Scheme’s design will safeguard the water environment, be resilient to flooding both now and in the future, and not increase the risk of flooding elsewhere. This includes high levels of flood resistant and resilient design.</p> <p>A Phase 1 Preliminary Risk Assessment (PRA) report has been prepared, covering land within the</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
East Riding Local Plan Update 2020-2039	Policy C2 Supporting community services and facilities	<p>A. To maintain and improve access to a range of services and facilities in the East Riding, which meet the needs of residents and in appropriate circumstances visitors, proposals will be supported that:</p> <ol style="list-style-type: none"> 1. Retain or enhance existing services and facilities; and/or 	<p>Order limits, and is available in Appendix 16-3, ES Volume 2 [EN101043/APP/6.2]. The information collected as part of the PRA suggest that the potential risks that have been identified from potential contaminated land are very low to moderate. It concludes that no significant constraints are anticipated with regards to contamination of soil and groundwater that would limit the development of the Site for a solar PV project.</p> <p>A number of environmental design and management measures will be employed as standard best practice to minimise impacts to both human health and controlled waters during the construction and decommissioning phases of the Scheme. These will be incorporated into the Framework CEMP, OEMP and DEMP ([EN010143/APP/7.7], [EN010143/APP/7.8], [EN010143/APP/7.9]) which will be provided alongside the ES [EN010143/APP/6.1] as part of this Application.</p>
			<p>As discussed in Chapter 12: Socio Economics and Land Use and Chapter 14: Human Health, ES Volume 1 [EN010143/APP/6.1], the Scheme would not result in any significant impact on existing services or facilities. Given the nature of the Scheme, no new services or facilities are proposed as part of the project.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>2. Provide for new services and facilities, including, where appropriate, new mixed use and multi-purpose facilities.</p> <p>B. Where services and facilities are provided as part of new development they should be well integrated within that development.</p> <p>C. The loss of health, education, and other services and facilities will only be permitted if:</p> <ol style="list-style-type: none">1. It is proved the existing use and proposals for alternative community uses on the site are not economically viable, and there is insufficient demand to support them;2. The loss is part of a wider proposal to improve service provision in the locality; or3. Existing facilities can adequately serve identified needs, in an equally accessible manner. <p>D. The views of the local community, and relevant town or parish council(s), will be important in order to establish the significance of, and demand for, individual facilities and develop solutions to enable their retention.</p>	

1.3 Table 3: East Riding of Yorkshire and Kingston upon Hull Joint Minerals Local Plan 2016-2033 (Adopted November 2019)

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
East Riding of Yorkshire and Kingston upon Hull Joint Minerals Local Plan 2016-2033 (Adopted November 2019)	Policy EC6 Protecting mineral resources	<p>A. Mineral Safeguarding Areas for sand and gravel, crushed rock, limestone, industrial chalk, clay and silica sand are identified on the Policies Map.</p> <p>B. Within or adjacent to Mineral Safeguarding Areas, non-mineral development, which would adversely affect the viability of exploiting the underlying or adjacent deposit in the future, will only be supported where it can be demonstrated that the:</p> <ol style="list-style-type: none"> 1. Underlying or adjacent mineral is of limited economic value; 2. Need for the development outweighs the need to safeguard the mineral deposit; 3. Non-mineral development can take place without preventing the mineral resource from being extracted in the future; 4. Non-mineral development is temporary in nature; or 5. The underlying or adjacent mineral deposit can be extracted prior to the nonmineral development proceeding, 	<p>Small parts in Solar PV Area 1a and 3c and the Grid Connection Corridor are located within the East Riding of Yorkshire’s Minerals Safeguarding Area (MSA) EC6.</p> <p>Chapter 12: Socio economics and land use, ES Volume 1 [EN010143/APP/6.1] and Appendix 12-2 Communications with Minerals Planning Authorities, ES Volume 2 [EN010143/APP/6.2] explain that the impact of the Scheme on minerals was scoped out of the environmental impact assessment in agreement with the East Riding of Yorkshire Council as the Mineral Planning Authority.</p> <p>The mineral deposits will not be permanently sterilised by the Scheme and can be extracted, if required, after its decommissioning which will commence 40 years after the Scheme’s final commissioning. The construction of the Scheme is minimally invasive and would not impact the underlying geology. In addition, due to the flat topography of the Site no significant earthworks are proposed.</p> <p>The Scheme therefore demonstrates accordance with requirement 3 and 4 of this policy as:</p> <ul style="list-style-type: none"> - The Scheme can be constructed, operated and decommissioned without preventing the mineral resource from being extracted in the future. The

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		or prior extraction of the deposit is not possible.	<p>location for the Grid Connection Substations that may not be decommissioned is outside the mineral safeguarding area. For the Grid Connection Cable, which may also not be decommissioned, the cable trench is only up to 1.5 m wide and where practicable the route of the Grid Cables will follow field boundaries thereby not preventing the mineral within the MSA being extracted in the future; and</p> <ul style="list-style-type: none">- The Scheme is temporary in nature being required to decommission 40 years after final commissioning so would not prejudice future extraction

1.4 Table 4: Selby District Local Plan Adopted February 2005 Part 1- General Policies

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
Selby District Local Plan Adopted February 2005 Part 1- General Policies	Policy ENV1 Control of Development	<p>Proposals for development will be permitted provided a good quality of development would be achieved. In considering proposals the District Council will take account of:</p> <ol style="list-style-type: none"> 1) The effect upon the character of the area or the amenity of adjoining occupiers; 2) The relationship of the proposal to the highway network, the proposed means of access, the need for road/junction improvements in the vicinity of the site, and the arrangements to be made for car parking; 3) The capacity of local services and infrastructure to serve the proposal, or the arrangements to be made for upgrading, or providing services and infrastructure; 4) The standard of layout, design and materials in relation to the site and its surroundings and associated landscaping; 5) The potential loss, or adverse effect upon, significant buildings, related spaces, trees, wildlife habitats, archaeological or other features important to the character of the area; 	<p>The Design and Access Statement [EN010143/APP/7.3] and the Design Principles Statement [EN010143/APP/7.4] set out details of the Scheme design. Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1] sets out how the design has evolved throughout the project.</p> <p>As detailed in section 6 of this Planning Statement [EN010143/APP/7.2] the Scheme has been informed by a detailed and sensitive iterative design process. This has involved taking account of the context and features of the land within the Order limits, sensitive receptors, information from environmental surveys and feedback from stakeholders. The design also takes into account the constraints and opportunities in order to develop a good design that balances the need to maximise renewable energy generation from the Scheme along with the minimisation of potential impacts or provision of mitigation and environmental enhancements where practicable.</p> <p>The works undertaken that would be covered by this Local Plan comprise the Grid Connection Corridor. This would be situated</p>

6) The extent to which the needs of disabled and other inconvenienced persons have been taken into account;

7) The need to maximise opportunities for energy conservation through design, orientation and construction; and

8) Any other material considerations

underground and would therefore have no impacts on the character of the area or amenity of adjoining occupiers. There would be no design features as these will not be visible above ground level.

A **Framework CTMP** is presented at **Appendix 13-5, ES Volume 2 [EN010143/APP/6.2]**. This will be updated to a detailed CTMP post-consent and prior to start of construction (secured through the DCO). The aim of the CTMP is to minimise the impact of construction traffic on local communities by managing traffic using the local highway network, and where required/practicable implementing mitigation. The **Framework CTMP [EN010143/APP/6.2]** defines information such as the routes that construction traffic must take, any timing restrictions in relation to the use of certain routes, and the penalties to contractors if the CTMP is not adhered to.

The Grid Connection Corridor would be accessed via proposed Site Accesses as shown on **Figure 1-3 ES Volume 3 [EN010143/APP/6.3]**. The site would be accessed via the A63/Hull Road, Pear Tree Avenue, Carr Lane, and the private access road at National Grid Drax Substation. Where access points require the creation of a junction bellmouth, they would be designed based on the relevant standard from DMRB CD 123

Geometric Design of at Grade Priority and Signal-Controlled Junctions.

Car parking would be provided at Construction Compound Area D, located off the A63/Hull Road.

There are not anticipated to be any significant impacts to local services.

<p>Selby District Local Plan Adopted February 2005 Part 1- General Policies</p>	<p>Policy ENV2 Environmental Pollution and Contaminated Land</p>	<p>Proposals for development which would give rise to, or would be affected by, unacceptable levels of noise, nuisance, contamination or other environmental pollution including groundwater pollution will not be permitted unless satisfactory remedial or preventative measures are incorporated as an integral element in the scheme. Such measures should be carried out before the use of the site commences.</p> <p>B) Where there is a suspicion that the site might be contaminated, planning permission may be granted subject to conditions to prevent the commencement of development until a site investigation and assessment has been carried out and development has incorporated all measures shown in the assessment to be necessary.</p>	<p>A Phase 1 Preliminary Risk Assessment (PRA) report has been prepared, covering land within the Order limits, and is available in Appendix 16-3, ES Volume 2 [EN101043/APP/6.2]. The information collected as part of the PRA suggest that the potential risks that have been identified from potential contaminated land are very low to moderate. It concludes that no significant constraints are anticipated with regards to contamination of soil and groundwater that would limit the development of the Site for a solar PV project.</p> <p>A number of environmental design and management measures will be employed as standard best practice to minimise impacts to both human health and controlled waters during the construction and decommissioning phases of the Scheme. These will be incorporated into the Framework CEMP, OEMP and DEMP ([EN010143/APP/7.7], [EN010143/APP/7.8], [EN010143/APP/7.9] which will be provided</p>
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alongside the **ES [EN010143/APP/6.1]** as part of this Application.

<p>Selby District Local Plan Adopted February 2005 Part 1- General Policies</p>	<p>Policy ENV3 Light Pollution</p>	<p>Proposals involving outdoor lighting will only be permitted where lighting schemes:</p> <ol style="list-style-type: none"> 1) Represent the minimum level required for security and/or operational purposes; 2) Are designed to minimise glare and spillage; 3) Would not create conditions prejudicial to highway safety or which would have a significant adverse effect on local amenity; and 4) Would not detract significantly from the character of a rural area. <p>Proposals for development involving outdoor lighting should incorporate details of lighting schemes as part of applications for development.</p>	<p>The lighting strategy for the construction phase will be set out in the detailed Construction Environmental Management Plan (CEMP). A Framework CEMP [EN010143/APP/7.7] (including details of lighting design) is provided as part of the DCO Application which the detailed CEMP will need to accord with. The lighting strategy represents the minimum level of lighting required for security, minimises glare and spillage, does not create conditions prejudicial to highway safety, or would have impacts to local amenity. It would also not detract from the character of the rural area.</p> <p>Construction works will generally be limited to daylight hours only, with focussed task specific lighting provided where this is not practicable, for example unless directed by authorities or areas requiring road closures or at the HDD locations requiring night-time working. Within construction compounds task specific and fixed 'general' lighting may be required in months with reduced daylight hours (early mornings and up to 19:00 for general workforce) to meet safety requirements. Additionally, lighting would be used by the roving security teams during their regular checks and 'emergency' visits (if an alert is triggered).</p>
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Outside of core working hours PIR controlled lights (motion sensors) will be used at construction compounds and at welfare areas. The CCTV will also use Infrared (IR) lighting to provide night vision functionality meaning that no visible lighting will be needed for the security system.

Selby District Local Plan Adopted February 2005 Part 1- General Policies	Policy ENV9 Sites of importance for Nature Conservation	Proposals for development which would harm a local nature reserve, a site of local importance for nature conservation or a regionally important geological/geomorphological site, will not be permitted unless there are no reasonable alternative means of meeting the development need and it can be demonstrated that there are reasons for the proposal which outweigh the need to safeguard the intrinsic local nature conservation value of the site or feature	The Scheme would not have any impact on any local nature reserve, site of local importance for nature conservation, or regionally important geological/geomorphological sites within North Yorkshire (formerly Selby District).
Selby District Local Plan Adopted February 2005 Part 1- General Policies	Policy ENV11 Ancient Woodland	Development will not be permitted where it is likely to cause loss of, or damage to, an ancient woodland, unless the reasons for the development outweigh the nature conservation value of the woodland.	Chapter 8: Ecology, ES Volume 1 [EN101043/APP/6.1] concludes that there would be no loss of, or damage to, ancient woodland, or loss or damage to veteran or ancient trees as a result of the Scheme.
Selby District Local Plan Adopted February 2005 Part 1- General Policies	Policy ENV12 River and Stream Corridors	Proposals for development likely to harm the natural features of or access to river, stream and canal corridors will not be permitted unless the importance of the development outweighs these interests, and adequate compensatory measures are provided.	Chapter 9: Flood Risk, Drainage and Surface Water, ES Volume 1 [EN010143/APP/6.1] presents the assessment of the likely significant effects on surface water bodies (e.g. rivers, streams, ditches, canals, lakes and ponds)

including water quality and hydromorphology, flood risk and drainage.

With appropriate mitigation it is considered that there would not be significant harm to the natural features of or access to river, stream and canal corridors as a result of the construction, operation or decommissioning of the Grid Connection Corridor.

<p>Selby District Local Plan Adopted February 2005 Part 1- General Policies</p>	<p>Policy ENV13 Development Affecting Ponds</p>	<p>Proposals for development which would harm the landscape, townscape, historical or wildlife value of a pond will not be permitted unless:</p> <ol style="list-style-type: none"> 1) The need for a particular development outweighs the particular value of the pond; 2) An equivalent habitat can be created on site or elsewhere in the locality which will provide the same landscape, townscape or wildlife value of the existing pond; and 3) Appropriate management measures are incorporated in the scheme. 	<p>The Scheme has been designed to retain existing ponds, which will be buffered by a minimum of 10m (except in a small number of cases where the full 10m is not feasible).</p> <p>The mitigation proposed for reptiles and other species will also reduce potential effects on common amphibian species, along with the retention of and buffers applied to the ponds present on site.</p> <p>As such, no harm is anticipated to the value of any pond.</p>
<p>Selby District Local Plan Adopted February 2005 Part 1- General Policies</p>	<p>Policy ENV15 Conservation and Enhancement of Locally Important Landscape Areas</p>	<p>Within the locally important landscape areas, as defined on the proposals map, priority will be given to the conservation and enhancement of the character and quality of the landscape. Particular attention should be paid to the design, layout, landscaping of development and the use of materials in order to minimise its impact and</p>	<p>The Grid Connection Corridor would not have any impact on any locally important landscape areas while operational, as it will be provided underground.</p> <p>During construction, no significant effects are anticipated on the local landscape, provided the Scheme complies with the mitigation measures set out in the Framework CEMP</p>

		to enhance the traditional character of buildings and landscape in the area.	[EN010143/APP/7.7] . This will inform a detailed CEMP which would be secured by the DCO.
Selby District Local Plan Adopted February 2005 Part 1- General Policies	Policy ENV 27 Scheduled Monuments and Important Archaeological Sites	Where scheduled monuments or other nationally important archaeological sites or their settings are affected by proposed development, there will be a presumption in favour of their physical preservation. In exceptional circumstances where the need for the development is clearly demonstrated, development will only be permitted where archaeological remains are preserved in situ through sympathetic layout or design of the development.	<p>The Grid Connection Corridor would not result in any impacts to scheduled monuments or other nationally important archaeological sites or their setting as set out in Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1].</p> <p>Chapter 7: Cultural Heritage, ES Volume 1 [EN010106/APP/6.1] identifies a significant adverse effect to the medieval moated site at Hagthorpe; a non-designated heritage asset, which is considered to be of schedulable quality, as a result of the laying of the Grid Connection Cable in the Grid Connection Corridor.</p> <p>Through the construction of the Grid Connection Cable, it is likely that there would be the permanent removal of a very limited part of the archaeological remains.</p> <p>Potential direct impacts on buried archaeological remains will be managed through a programme of additional mitigation which may include preservation in situ, archaeological investigation and recording, and a protocol for dealing with unexpected archaeological discoveries during construction. This mitigation will be outlined in an Overarching Written Scheme of Investigation</p>

<p>Selby District Local Plan Adopted February 2005 Part 1- General Policies</p>	<p>Policy ENV28 Other Archaeological Remains</p>	<p>Where development proposals affect sites of known or possible archaeological interest, the District Council will require an archaeological assessment/evaluation to be submitted as part of the planning application.</p> <p>Where development affecting archaeological remains is acceptable in principle, the Council will require that archaeological remains are preserved in situ through careful design and layout of new development.</p> <p>Where preservation in situ is not justified, the Council will require that arrangements are made by the developer to ensure that adequate time and resources are available to allow archaeological investigation and recording by a competent archaeological organisation prior to or during development.</p>	<p>for Archaeological Mitigation which will be agreed with the archaeology officers for North Yorkshire Council.</p>
			<p>Chapter 7: Cultural Heritage, ES Volume 1 [EN010106/APP/6.1] has identified effects to designated and non-designated assets as a result of the Scheme. All effects to designated assets are not significant.</p>
			<p>Chapter 7: Cultural Heritage, ES Volume 1 [EN010106/APP/6.1] identifies a significant adverse effect to the medieval moated site at Hagthorpe; a non-designated heritage asset, which is considered to be of schedulable quality, as a result of the laying of the Grid Connection Cable in the Grid Connection Corridor.</p>
			<p>Through the construction of the Grid Connection Cable, it is likely that there would be the permanent removal of a very limited part of the archaeological remains.</p>
			<p>Potential direct impacts on buried archaeological remains will be managed through a programme of additional mitigation which may include preservation in situ, archaeological investigation and recording, and a protocol for dealing with unexpected archaeological discoveries during construction. This mitigation will be outlined in an Overarching Written Scheme of Investigation</p>

for Archaeological Mitigation which will be agreed with the archaeology officers for North Yorkshire Council.

<p>Selby District Local Plan Adopted February 2005 Part 1- General Policies</p>	<p>Policy EMP10 Additional Industrial Development at Drax and Eggborough Power Stations</p>	<p>Additional industrial/business development may be permitted at or close to Drax and Eggborough power stations provided the proposal:</p> <ol style="list-style-type: none"> 1) Is directly related to the process of generating electricity, either by making use of by-products from the power station or utilising a direct source of electricity; 2) Would be suitably linked to the strategic highway and rail networks and would not create conditions prejudicial to highway safety; 3) Would not create environmental problems associated with noise, smell or water pollution or dust emissions; 4) Would not have a significant adverse effect on residential amenity in nearby settlements; 5) Would be related to existing development and would be well screened, including provision for earth mounding and strategic off-site planting; and 6) Would not harm nature conservation interests or sites of archaeological importance. 	<p>The Scheme does not comprise additional industrial/business development at Drax.</p> <p>The Scheme will comprise the construction, operation (including maintenance), and decommissioning of a solar photovoltaic (PV) electricity generating facility with a total capacity exceeding 50 megawatts (MW) and export connection to the national grid, at National Grid's Drax Substation.</p> <p>The Scheme will deliver the Grid Connection Cable into an existing spare bay of the National Grid Drax Substation. All works to the National Grid Drax Substation to accommodate the Scheme connection would be undertaken by National Grid and are beyond the scope of the Scheme's DCO Application.</p>
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Selby District Local Plan Adopted February 2005 Part 1- General Policies	Policy T1 Development in Relation to the Highway network	Development proposals should be well related to the existing highways network and will only be permitted where existing roads have adequate capacity and can safely serve the development, unless appropriate off-site highway improvements are undertaken by the developer.	The Grid Connection Corridor is well served by the existing highways network. Where Site Accesses are identified outside of the public highway, these generally follow the line of existing farm accesses including existing private roads such as those within Drax Power Station. A Framework Construction Traffic Management Plan (CTMP) is presented at Appendix 13-5, ES Volume 2 [EN010143/APP/6.2] . This will be updated to a detailed CTMP post-consent and prior to start of construction (secured through the DCO). Impacts of construction traffic on local communities will be minimised by managing traffic using the local highway network, and where required/practicable implementing mitigation. The Framework CTMP defines information such as the routes that construction traffic must take, any timing restrictions in relation to the use of certain routes, and the penalties to contractors if the CTMP is not adhered to.
Selby District Local Plan Adopted February 2005 Part 1- General Policies	Policy T2 Access to Roads	Development proposals which would result in the creation of a new access or the intensification of the use of an existing access will be permitted provided: 1) There would be no detriment to highway safety; and	The Grid Connection Corridor would be accessed via proposed Site Accesses as shown on Figure 1-3 ES Volume 3 [EN010143/APP/6.3] . The Grid Connection Corridor would be accessed via the A63/Hull Road, Pear Tree Avenue, Carr Lane, and the private access road at National Grid Drax

2) The access can be created in a location and to a standard acceptable to the highway authority. Proposals which would result in the creation of a new access onto a primary road or district distributor road will not be permitted unless there is no feasible access onto a secondary road and the highway authority is satisfied that the proposal would not create conditions prejudicial to highway safety.

Substation. Where access points require the creation of a junction bellmouth, they would be designed based on the relevant standard from DMRB CD 123 Geometric Design of at Grade Priority and Signal-Controlled Junctions.

Car parking would be provided at Construction Compound Area D, located off the A63/Hull Road.

Site accesses are provided predominantly along or adjacent to the highway. Where Site Accesses are identified outside of the public highway, these generally follow the line of existing farm accesses.

These accesses would not cause any detriment to highway safety within North Yorkshire (formerly Selby District), and they are created to an acceptable standard, as set out in **Chapter 13: Transport and Access, ES Volume 1 [EN010143/APP/6.1]**, the Transport Assessment, **Appendix 13-4 ES Volume 2 [EN010143/APP/6.2]** and the Construction Traffic Management Plan, **Appendix 13-5 ES Volume 2 [EN010143/APP/6.2]**.

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Policy T8 Public
 Rights of Way

Development which would have a significant adverse effect on any route in the district's public rights of way network will not be permitted unless the following can be achieved:

The Scheme would not have any significant adverse effect on PRow within Selby District.

The **Framework Public Rights of Way Management Plan [EN010143/APP/7.13]** sets out how the Public Rights of Way within the

Part 1- General Policies

- 1) Satisfactory and attractive alternative routes are provided; and
- 2) Adequate sign posting is provided; and
- 3) As far as is reasonable, the new route can make provision for walkers, horse riders, cyclists and people with sight or mobility problems; and
- 4) In the case of new reasonable development, such development must replace extinguished rights of way with attractive highway infrastructure which is equally capable of accommodating appropriate users of the original right of way.

The District Council will work with the highway authority and other interested parties to extend and improve the public rights of way network for amenity as well as highway reasons.

Order limits will be managed during construction and operation of the Scheme. During construction, PRow routes associated with Rivers Ouse and Derwent in the Grid Connection Corridor will remain open (owing to trenchless crossing methodology).

1.5 Table 5: Selby District Core Strategy Local Plan, October 2013

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
Selby District Core Strategy Local Plan, October 2013	Policy SP1 Presumption in Favour of Sustainable Development	<p>When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.</p> <p>Planning applications that accord with the policies in the Local Plan¹⁵ (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.</p> <p>Where there are no policies relevant to the application or relevant policies are out of date (as defined by the NPPF) at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:</p> <ul style="list-style-type: none"> o Any adverse impacts of granting permission would significantly and 	<p>The environmental impacts of the Scheme have been assessed as reported in the ES [EN0101043/APP/6.1-6.4] and are discussed in this Planning Statement [EN010143/APP/7.2]. Overall, with appropriate mitigation implemented, the Scheme is expected to have limited and localised residual significant adverse effects during its 40 year operation when considered relative to the large scale nature of the Scheme. These effects are therefore considered to be outweighed by the significant national benefits that the Scheme will provide. As explained further in this section of the Planning Statement [EN010143/APP/7.2], there are no specific and relevant policies set out in the relevant NPSs which clearly indicate that consent should be refused.</p> <p>In summary, the Scheme has a vital role to play in the UK's urgent response to tackle climate change. The Scheme is critical and will make a timely contribution to the decarbonisation, affordability and security of UK's energy supply. Any potential residual significant environmental effects are outweighed by the benefits of the Scheme, the contribution towards meeting the energy need being one of these key benefits. There are no policies which clearly indicate that consent should be refused.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or</p> <p>o Specific policies in that Framework indicate that development should be restricted.</p>	<p>The Scheme is therefore in compliance with the relevant national and local policies relating to the need for, and provision of, renewable energy infrastructure. Helping meet this established urgent need should weigh substantially in favour of the DCO being granted.</p>
<p>Selby District Core Strategy Local Plan, October 2013</p>	<p>Policy SP12 Access to Services, Community Facilities and Infrastructure</p>	<p>Where infrastructure and community facilities are to be implemented in connection with new development, it should be in place or provided in phase with development and scheme viability. Infrastructure and community facilities should be provided on site, but where this is technically unachievable or not appropriate for other justified reasons, off-site provision or a financial contribution towards infrastructure and community facilities will be sought. In all circumstances opportunities to protect, enhance and better join up existing Green Infrastructure, as well as creating new Green Infrastructure will be strongly encouraged, in addition to the incorporation of other measures to mitigate or minimise the consequences of development. These provisions will be secured through conditions attached to the grant of</p>	<p>The Scheme would not include the implementation of infrastructure or community facilities.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
Selby District Core Strategy Local Plan, October 2013	Policy SP15 Sustainable Development and Climate Change	<p>planning permission or through planning obligations, including those set out in an up to date charging mechanism.</p> <p>A. Promoting Sustainable Development In preparing its Site Allocations and Development Management Local Plans, to achieve sustainable development, the Council will:</p> <ul style="list-style-type: none"> a) Direct development to sustainable locations in accordance with Policy SP2; b) Give preference to the re-use, best-use and adaption of existing buildings and the use of previously developed land where this is sustainably located and provided that it is not of high environmental value; c) Achieve the most efficient use of land without compromising the quality of the local environment; d) Ensure that development in areas of flood risk is avoided wherever possible through the application of the sequential test and exception test; and ensure that where development must be located within areas of flood risk that it can be made safe without increasing flood risk elsewhere; e) Support sustainable flood management measures such as water 	<p>The development proposed within North Yorkshire (formerly Selby District) comprises the Grid Connection Corridor, which would be provided underground.</p> <p>As such, there would be minimal impacts to the majority of factors considered in this policy.</p> <p>The majority of the Grid Connection Corridor is located within high and medium risk of fluvial flooding (Flood Zone 2 and 3). As set out in Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1], the majority of the land around the point of connection is Flood Zone 2 or 3 and as such there are no reasonable alternative routes for the Grid Connection Corridor outside of Flood Zone 2 and 3. Because of this, it is therefore necessary to apply the Exception Test.</p> <p>The Scheme will provide wider sustainability benefits by contributing to energy security, affordability and helping to achieve the government targets for Net Zero, which outweigh flood risk, and appropriate mitigation has been considered to ensure that the Scheme remains operational and is safe during times of flooding. It has therefore been demonstrated that</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>storage areas and schemes promoted through local surface water management plans to provide protection from flooding; and biodiversity and amenity improvements.</p> <p>f) Ensure development proposals respond to land characteristics to minimise risks of erosion, subsidence and instability, and to exploit opportunities for reclamation and reinstatement of contaminated land.</p> <p>B. Design and Layout of Development In order to ensure development contributes toward reducing carbon emissions and are resilient to the effects of climate change, schemes should where necessary or appropriate:</p> <p>a) Improve energy efficiency and minimise energy consumption through the orientation, layout and design of buildings and incorporation of facilities to support recycling;</p> <p>b) Incorporate sustainable design and construction techniques, including for example, solar water heating storage, green roofs and re-use and recycling of secondary aggregates and other building materials, and use of locally sourced materials;</p>	<p>the Exception Test has been met. The FRA, Appendix 9-3, ES Volume 2 [EN010143/APP/6.2] and associated Sequential Test Report (Annex to the FRA) set out further detail on this.</p> <p>The Grid Connection Corridor spans the ‘Derwent from Elvington Beck to River Ouse’, ‘Ouse from R Wharfe to Upper Humber’ and Fleet Dike WFD waterbody catchments, within which there are a number of watercourses that will require crossing.</p> <p>These crossings will be undertaken via HDD, which will avoid the need to directly impact these watercourses. Mitigation requirements, such as a site-specific hydraulic fracture risk assessment will be produced prior to commencing works to define the mitigation required based on ground conditions. Water quality monitoring will also be undertaken prior to, during, and following on from the construction activity to ensure any spillage or other pollution is identified. These will be outlined in a Water Management Plan (WMP), as secured in the Framework CEMP [EN010143/APP/7.7].</p> <p>No significant effect is reported on the River Derwent SSSI or SAC, nor on the downstream Humber Estuary SAC, SSSI, SPA and Ramsar site.</p> <p>No significant effects are also reported on Unnamed drain DE53 and Loftsome Bridge Drain, or the 11</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>c) Incorporate water-efficient design and sustainable drainage systems which promote groundwater recharge;</p> <p>d) Protect, enhance and create habitats to both improve biodiversity resilience to climate change and utilise biodiversity to contribute to climate change mitigation and adaptation;</p> <p>e) Include tree planting, and new woodlands and hedgerows in landscaping schemes to create habitats, reduce the ‘urban heat island effect’ and to offset carbon loss;</p> <p>f) Minimise traffic growth by providing a range of sustainable travel options (including walking, cycling and public transport) through Travel Plans and Transport Assessments and facilitate advances in travel technology such as Electric Vehicle charging points;</p> <p>g) Make provision for cycle lanes and cycling facilities, safe pedestrian routes and improved public transport facilities; and</p> <p>h) Incorporate decentralised, renewable and low-carbon forms of energy generation (in line with Policy SP16 and Policy SP17).</p>	<p>intrusive crossings of agricultural drains and ditches (including the WFD designated Fleet Dike) which are tributaries of the River Derwent and River Ouse for the Grid Connection (see Figure 9-2 Drain Names, ES Volume 3 [EN010143/APP/6.3]).</p> <p>There would therefore be no significant effect to potential downstream receptors including the Lower Derwent Valley SAC, SPA, NNR and Ramsar site, the Brighton Meadows SSSI or Derwent</p> <p>Given that no other watercourses or water features will be directly affected by the construction works for the Grid Connection, and that the Site has buffer zones around watercourses and ponds, a no change magnitude of impact is predicted for all other surface water receptors from site runoff and chemical spillages.</p> <p>There would therefore be no significant effect to potential downstream receptors including the Lower Derwent Valley SAC, SPA, NNR and Ramsar site, the Brighton Meadows SSSI or Derwent Ings SSSI.</p> <p>The Grid Connection Cable and Interconnecting Cable Corridors have been designed to minimise disturbance of existing vegetation and where selective</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
Selby District Core Strategy Local Plan, October 2013	Policy SP17 Low-Carbon and Renewable Energy	<p>A. In future Local Plan documents, the Council will:</p> <ul style="list-style-type: none"> • seek to identify opportunities where development can draw its energy from renewable, low carbon or decentralised energy supply systems and for co-locating potential heat customers and suppliers; and • consider identifying 'suitable areas' for renewable and low carbon energy sources and supporting infrastructure. <p>B. The Council will support community-led initiatives for renewable and low carbon energy developments being taken forward through neighbourhood plans including those outside any identified suitable areas.</p>	<p>vegetation removal is required, replacement planting will be reinstated, where practicable.</p> <p>The Applicant will endeavour to encourage all construction staff to use lower carbon modes of transport by identifying and communicating local bus and rail connections and pedestrian and cycle access routes to/from the Scheme and providing appropriate facilities for the safe storage of cycles, as set out in Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1].</p>
			<p>The Scheme will comprise the construction, operation (including maintenance), and decommissioning of a solar photovoltaic (PV) electricity generating facility with a total capacity exceeding 50 megawatts (MW) and export connection to the national grid, at National Grid's Drax Substation.</p> <p>As set out in the Statement of Need [EN010143/APP/7.1] the Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure and low-carbon electricity both during and beyond the critical 2020s timeframe. Maximising the capacity of generation in the resource-rich, well-connected and technically deliverable proposed location for the Scheme, represents a significant and economically rational</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>C. All development proposals for new sources of renewable energy and low-carbon energy generation and supporting infrastructure must meet the following criteria:</p> <ul style="list-style-type: none"> i. are designed and located to protect the environment and local amenity or ii. can demonstrate that the wider environmental, economic and social benefits outweigh any harm caused to the environment and local amenity, and iii. impacts on local communities are minimised. Schemes may utilise the full range of available technology including; <ul style="list-style-type: none"> a) Renewable energy schemes, which contribute to meeting or exceeding current local targets of 32 megawatts by 2021 or prevailing sub-regional or local targets; b) Micro-generation schemes, which are not necessarily gridconnected but which nevertheless, reduce reliance on scarce, non-renewable energy resources; c) Clean Coal Bed Methane extraction, clean coal energy generation and Carbon Capture and Storage technologies (in accordance with County Minerals Policies); and 	<p>step forwards in the fight against the global climate emergency.</p> <p>The development being proposed within North Yorkshire (formerly Selby District) comprises the Grid Connection Corridor and connection to the National Grid Drax Substation. This would be delivered underground and as such would not result in any significant impacts to the environment or local amenity.</p> <p>During construction, the implementation of the Framework CEMP [EN010143/APP/7.7], secured through the DCO, would include measures to manage the environmental and amenity effects of the Scheme and to demonstrate compliance with environmental legislation.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
Selby District Core Strategy Local Plan, October 2013	Policy SP18 Protecting and Enhancing the Environment	<p>d) Improvements at existing fossil fuel energy generating plants to reduce carbon emissions, within the national energy strategy for a balanced mix of energy sources to meet demands.</p> <p>D. In areas designated as Green Belt, elements of many renewable energy projects will comprise inappropriate development and in such cases applicants must demonstrate very special circumstances if projects are to proceed and proposals must meet the requirements of Policy SP3 and national Green Belt policies.</p> <p>The high quality and local distinctiveness of the natural and manmade environment will be sustained by:</p> <ol style="list-style-type: none"> 1. Safeguarding and, where possible, enhancing the historic and natural environment including the landscape character and setting of areas of acknowledged importance. 2. Conserving those historic assets which contribute most to the distinct character of the District and realising the potential contribution that they can make towards economic regeneration, tourism, education and quality of life. 	<p>The development being proposed within North Yorkshire (formerly Selby District) comprises the Grid Connection Corridor and connection to the National Grid Drax Substation. This would be delivered underground and as such would not result in any significant impacts to the natural or manmade environment.</p> <p>The Grid Connection Cable and Interconnecting Cable Corridors have been designed to minimise disturbance of existing vegetation and where selective vegetation removal is required, replacement planting will be reinstated, where practicable.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>3. Promoting effective stewardship of the District’s wildlife by:</p> <p>a) Safeguarding international, national and locally protected sites for nature conservation, including SINCs, from inappropriate development.</p> <p>b) Ensuring developments retain, protect and enhance features of biological and geological interest and provide appropriate management of these features and that unavoidable impacts are appropriately mitigated and compensated for, on or off-site.</p> <p>c) Ensuring development seeks to produce a net gain in biodiversity by designing-in wildlife and retaining the natural interest of a site where appropriate.</p> <p>d) Supporting the identification, mapping, creation and restoration of habitats that contribute to habitat targets in the National and Regional biodiversity strategies and the local Biodiversity Action Plan. 4. Wherever possible a strategic approach will be taken to increasing connectivity to the District’s Green Infrastructure including improving the network of linked open spaces and green corridors and promoting</p>	<p>Chapter 7: Cultural Heritage, ES Volume 1 [EN010106/APP/6.1] has identified effects to designated and non-designated assets as a result of the Scheme. All effects to designated assets are not significant.</p> <p>Chapter 7: Cultural Heritage, ES Volume 1 [EN010106/APP/6.1] identifies a significant adverse effect to the medieval moated site at Hagthorpe; a non-designated heritage asset, which is considered to be of schedulable quality, as a result of the laying of the Grid Connection Cable in the Grid Connection Corridor.</p> <p>Through the construction of the Grid Connection Cable, it is likely that there would be the permanent removal of a very limited part of the archaeological remains.</p> <p>Potential direct impacts on buried archaeological remains will be managed through a programme of additional mitigation which may include preservation in situ, archaeological investigation and recording, and a protocol for dealing with unexpected archaeological discoveries during construction. This mitigation will be outlined in an Overarching Written Scheme of Investigation for Archaeological Mitigation which will be agreed with the archaeology officers for North Yorkshire Council.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>opportunities to increase its multi-functionality. This will be informed by the Leeds City Region Infrastructure Strategy.</p> <p>5. Identifying, protecting and enhancing locally distinctive landscapes, areas of tranquillity, public rights of way and access, open spaces and playing fields through Development Plan Documents.</p> <p>6. Encouraging incorporation of positive biodiversity actions, as defined in the local Biodiversity Action Plan, at the design stage of new developments or land uses.</p> <p>7. Ensuring that new development protects soil, air and water quality from all types of pollution.</p> <p>8. Ensuring developments minimise energy and water consumption, the use of non-renewable resources, and the amount of waste material.</p> <p>9. Steering development to areas of least environmental and agricultural quality.</p>	<p>There would be no significant adverse effects reported on any international, national or locally protected sites for nature conservation, and ecological features will be retained as far as practicable, as set out in Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1].</p> <p>The Grid Connection Corridor spans the ‘Derwent from Elvington Beck to River Ouse’, ‘Ouse from R Wharfe to Upper Humber’ and Fleet Dike WFD waterbody catchments, within which there are a number of watercourses that will require crossing.</p> <p>These crossings will be undertaken via HDD, which will avoid the need to directly impact these watercourses. Mitigation requirements, such as a site-specific hydraulic fracture risk assessment will be produced prior to commencing works to define the mitigation required based on ground conditions. Water quality monitoring will also be undertaken prior to, during, and following on from the construction activity to ensure any spillage or other pollution is identified. These will be outlined in a Water Management Plan (WMP), as secured in the Framework CEMP [EN010143/APP/7.7].</p> <p>No significant effect is reported on the River Derwent SSSI or SAC, nor on the downstream Humber Estuary SAC, SSSI, SPA and Ramsar site.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
			<p>No significant effects are also reported on Unnamed drain DE53 and Loftsome Bridge Drain, or the 11 intrusive crossings of agricultural drains and ditches (including the WFD designated Fleet Dike) which are tributaries of the River Derwent and River Ouse for the Grid Connection (see Figure 9-2 Drain Names, ES Volume 3 [EN010143/APP/6.3]).</p> <p>There would therefore be no significant effect to potential downstream receptors including the Lower Derwent Valley SAC, SPA, NNR and Ramsar site, the Brighton Meadows SSSI or Derwent Ings SSSI.</p> <p>Agricultural land quality was a key consideration of the site selection process as set out in Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1]. The Scheme is located mostly on lower quality agricultural land, with the majority of the Scheme being on land not classed as Best and Most Versatile (BMV).</p> <p>BMV land is within the Grid Connection Corridor however the Grid Connection Corridor identified includes substantially more land than will be required for the construction of the Scheme, as this allows a degree of spatial flexibility during final detailed design post-consent. The actual area of soil disturbance</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
Selby District Core Strategy Local Plan, October 2013	Policy SP19 Design Quality	Proposals for all new development will be expected to contribute to enhancing community cohesion by achieving high quality design and have regard to the local character, identity and context of its	<p>/temporary loss of agricultural land would be much less.</p> <p>Furthermore, all land within the Grid Connection and Interconnecting Cable Corridors will return to their pre-development land use on completion of construction. A Framework Soil Resource Management Plan (SRMP) [EN010143/APP/7.10] has been prepared detailing the measures to protect the soil resource during construction and a detailed SRMP is a requirement of the DCO.</p> <p>During construction, the Applicant will maintain ongoing communications with farmers and landowners throughout the development and construction phases of the Scheme. Additionally, as set out in the Framework CEMP [EN010143/APP/7.7] a Land Officer (who may be part of the Land Agent team) will be employed for the duration of construction operations. The Site-specific data gained from discussions can assist in ensuring that construction effects of the Scheme on agriculture and agricultural operations are minimised where practicable.</p> <p>The location of the Grid Connection Corridor has been informed by the need to connect to the National Grid Drax Substation.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>surroundings including historic townscapes, settlement patterns and the open countryside. Where appropriate schemes should take account of design codes and Neighbourhood Plans to inform good design. Both residential and non-residential development should meet the following key requirements:</p> <ul style="list-style-type: none"> a) Make the best, most efficient use of land without compromising local distinctiveness, character and form. b) Positively contribute to an area's identity and heritage in terms of scale, density and layout; c) Be accessible to all users and easy to get to and move through; d) Create rights of way or improve them to make them more attractive to users, and facilitate sustainable access modes, including public transport, cycling and walking which minimise conflicts; e) Incorporate new and existing landscaping as an integral part of the design of schemes, including off-site landscaping for large sites and sites on the edge of settlements where appropriate; f) Promote access to open spaces and green infrastructure to support 	<p>As set out in the Design and Access Statement [EN010143/APP/7.3] the Grid Connection Corridor has been designed to avoid, where practicable, sensitive receptors such as habitat designations, residential and commercial properties, heritage assets and to minimise the number of affected land interests. It has been subsequently refined based upon ongoing studies and surveys as well as feedback from consultees. Where practicable, the routing of the cables will follow field edges to minimise disturbance to agricultural land or cables will be run in the roadside.</p> <p>As the Grid Connection Corridor would be underground once operational, the majority of design considerations within this policy are not relevant.</p> <p>Construction of the cable and route would be undertaken in accordance with the Framework CEMP EN010143/APP/7.7], which details mitigation and management measures that will be adhered to during the construction of the Scheme, ensuring it minimises any impacts where practicable.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>community gatherings and active lifestyles which contribute to the health and social well-being of the local community;</p> <p>g) Have public and private spaces that are clearly distinguished, safe and secure, attractive and which complement the built form;</p> <p>h) Minimise the risk of crime or fear of crime, particularly through active frontages and natural surveillance;</p> <p>i) Create mixed use places with variety and choice that compliment one another to encourage integrated living, and</p> <p>j) Adopt sustainable construction principles in accordance with Policies SP15 and SP16.</p> <p>k) Preventing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water, light or noise pollution or land instability.</p> <p>l) Development schemes should seek to reflect the principles of nationally recognised design benchmarks to ensure that the best quality of design is achieved.</p>	

1.6 Table 6: Selby District Council Local Plan Publication Version Consultation 2022

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
Selby District Council Local Plan Publication Version Consultation 2022	Policy SG1 Achieving Sustainable Development (Strategic Policy)	<p>A. When considering proposals for new development the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work positively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.</p> <p>B. Planning applications that accord with the policies in the Local Plan (and, where relevant, with policies in Neighbourhood Plans) will be approved without delay, unless material considerations indicate otherwise.</p> <p>C. In the absence of a five-year housing supply or where policies are out of date (as defined by the National Planning Policy Framework) or not being able to meet the requirements of the</p>	<p>The environmental impacts of the Scheme have been assessed as reported in the ES [EN0101043/APP/6.1-6.4] and are discussed in this Planning Statement [EN010143/APP/7.2]. Overall, with appropriate mitigation implemented, the Scheme is expected to have limited and localised residual significant adverse effects during its 40 year operation when considered relative to the large scale nature of the Scheme. These effects are therefore considered to be outweighed by the significant national benefits that the Scheme will provide. As explained further in this section of the Planning Statement [EN010143/APP/7.2], there are no specific and relevant policies set out in the relevant NPSs which clearly indicate that consent should be refused.</p> <p>In summary, the Scheme has a vital role to play in the UK's urgent response to tackle climate change. The Scheme is critical and will make a timely contribution to the decarbonisation, affordability and security of UK's energy supply. Any potential residual significant environmental effects are outweighed by the benefits of the Scheme, the contribution towards meeting the energy need being one of these key benefits. There are no policies which clearly indicate that consent should be refused.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>Housing Delivery Test at the time of making the decision then the Council will grant permission, which is consistent with the role of the settlement hierarchy as set out in Policy SG2 unless material considerations indicate otherwise, taking into account whether:</p> <ul style="list-style-type: none"> e. Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; and f. Specific policies in that Framework indicate that development should be restricted; and g. The site is well related to the existing built form and is of a scale and nature that is in keeping with the form and scale of the settlement; and h. The development contributes to meeting the Visions and Objectives of the Local Plan. <p>D. The Council will support proposals which seek to mitigate and adapt to the causes and effects of climate</p>	<p>The Scheme is therefore in compliance with the relevant national and local policies relating to the need for, and provision of, renewable energy infrastructure. Helping meet this established urgent need should weigh substantially in favour of the DCO being granted.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		change, through the creation of well designed development, which optimises opportunity of active travel.	
Selby District Council Local Plan Publication Version Consultation 2022	Policy SG3 Development Limits (Strategic Policy)	<p>Development Limits are:</p> <p>A. Defined around the Selby Urban Area, Tadcaster, Sherburn in Elmet and the Tier 1 and Tier 2 Villages as defined in the Settlement Hierarchy.</p> <p>B. Within Development Limits proposals will be supported (subject to other relevant planning policies) for infill development, the re-development of previously developed land and the conversion/change of use of existing buildings, in accordance with Policy HG2 for housing development and EM3 for economic development.</p> <p>C. Outside the Development Limits; Development will be supported, in the Smaller Villages, as defined in the Settlement Hierarchy, for very small-scale development commensurate with the character of the individual settlement, in accordance with Policy HG2 for</p>	<p>Due to the scale of the land required to deliver the substantial renewable energy generation capacity that the Scheme will provide, and the need to be in sufficient proximity of the connection point to the National Electricity Transmission System (NETS), the Scheme could not be located within development limits.</p> <p>The Statement of Need [EN010143/APP/7.1] and Section 5 of the Planning Statement [EN010143/APP/7.2] explain that the Scheme is a substantial infrastructure asset, capable of delivering large amounts of secure, affordable, low-carbon electricity to local and national networks.</p> <p>The contribution the Scheme would make to meeting the established urgent need for renewable energy generation infrastructure warrants its location in the countryside.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
Selby District Council Local Plan Publication Version Consultation 2022	Policy SG4 Development in the Countryside (Strategic Policy)	<p>residential, EM4 for economic development and other relevant policies.</p> <p>D. Hamlets and groups of buildings not identified within the settlement hierarchy will be treated as part of the Countryside and proposals for development will be determined in accordance with Policy SG4 (Development in the Countryside), an adopted Neighbourhood Plan and other local and national policies.</p> <p>The Council will seek to ensure that Selby District remains a special place to live by supporting development which protects and enhances the intrinsic character and beauty of the countryside, recognising the important role it plays in the local economy, for the health and well-being of local residents and as a biodiversity resource. Development in the countryside as defined in Policy SG2 (Spatial Approach) will be limited to activities which have an essential need to be located in the countryside as set out in National Policy will not adversely harm the character, appearance and environmental qualities of the area in which it is located and are supported by</p>	<p>The contribution the Scheme would make to meeting the established urgent need for renewable energy generation infrastructure warrants its location in the countryside.</p> <p>The Grid Connection Corridor would be underground, and as such would not have any impact on the intrinsic character and beauty of the countryside. It would also not have any significant impact on the important role the countryside makes to the local economy, for health and well-being and as a biodiversity resource.</p> <p>The Scheme is considered to be regarded as 'essential infrastructure' as it would make a direct contribution to the provision of low carbon</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>other development plan policies including; EM4 The Rural Economy, EM5 Tourist, Recreation and Cultural Facilities, EM6 Holiday Accommodation, HG2 Windfall Developments, HG3 Rural Workers Dwellings, HG4 Replacement Dwellings in the Open Countryside, HG5 Re-Use or Conversion of Rural Buildings in the Open Countryside, HG8 Rural Exception Sites, HG9 Conversions to Residential Use and Changes of Use to Garden Land.</p>	<p>generation capacity that is urgently required in order to meet the Government’s objectives and commitments for the development of a secure, affordable, and low carbon energy system.</p> <p>The Grid Connection Corridor would not adversely harm the character, appearance and environmental qualities of the area, as set out in Section 6 of the Planning Statement [EN010143/APP/7.2] and the relevant chapters of the ES, Volume 1 [EN010143/APP/6.1].</p>
		<p>Best and Most Versatile Agricultural Land</p> <p>A. The best and most versatile land will be protected by;</p> <p>i. Avoiding the irreversible loss of the best and most versatile agricultural land (Grade 1 to 3a) where possible; and</p> <p>j. Avoiding Grade 1 agricultural land unless there are exceptional circumstances where the benefits of the proposal significantly outweigh the loss of land.</p> <p>B. Where the Council accepts that the applicant has demonstrated that there is a need for best and most versatile land to be developed and</p>	<p>Agricultural land quality was a key consideration of the site selection process as set out in Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1]. The Scheme is located mostly on lower quality agricultural land, with the majority of the Scheme being on land not classed as Best and Most Versatile (BMV).</p> <p>The majority of BMV land is within the Grid Connection Corridor. The Grid Connection Corridor identified includes substantially more land than will be required for the construction of the Scheme, as this allows a degree of spatial flexibility during final detailed design post-consent. The actual area of soil disturbance /temporary loss of agricultural land would be much less.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>there is a choice between sites or areas of land in different grades; land of the lowest grade available should be used except where other policy or material considerations outweigh land quality issues. Proposals for development should demonstrate that soil resources have been protected and used sustainably in line with best practice.</p>	<p>Furthermore, all land within the Grid Connection and Interconnecting Cable Corridors will return to their pre-development land use on completion of construction. A Framework Soil Resource Management Plan (SRMP) [EN010143/APP/7.10] has been prepared detailing the measures to protect the soil resource during construction and a detailed SRMP is a requirement of the DCO.</p> <p>During construction, the Applicant will maintain ongoing communications with farmers and landowners throughout the development and construction phases of the Scheme. Additionally, as set out in the Framework CEMP [EN010143/APP/7.7] a Land Officer (who may be part of the Land Agent team) will be employed for the duration of construction operations. The Site-specific data gained from discussions can assist in ensuring that construction effects of the Scheme on agriculture and agricultural operations are minimised where practicable.</p>
<p>Selby District Council Local Plan Publication Version Consultation 2022</p>	<p>Policy SG7 Strategic Countryside Gaps (Strategic Policy)</p>	<p>Development within the Strategic Countryside Gaps, as defined on the Policies Map, will only be supported where it is demonstrated that it will maintain and enhance the open character of the countryside and where the gap will not be compromised.</p>	<p>The Order limits are not situated within a 'strategic countryside gap' allocated within the Local Plan. The closest Strategic Countryside Gaps are the Cliffe and Hemingborough, and Barbly and Osgodby Strategic Countryside Gaps, located to the west of the Grid Connection Corridor. The development would not have any impact on these gaps, and it would maintain the open character of the</p>

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Selby District Council Local Plan Publication Version Consultation 2022	Policy SG9 Design (Strategic Policy)	<p>A. In order to make Selby District a great place to live and enjoy, all new development should be of high quality design which responds positively to the special character and local distinctiveness of the area. In order to achieve this all new development should seek to reflect national and local policies and guidance which promotes high quality design including Neighbourhood Plans, Conservation Area Appraisals and Village Design Statements.</p> <p>B. Development should where appropriate seek to:</p> <p>a. Respond to it's location in terms of the natural, historic and built environment reflecting important views and landscapes and reinforces the distinctiveness and character of the local area having regard to the existing form, scale, density, layout, building materials and detailing;</p>	<p>countryside, ensuring the gap will not be compromised.</p> <p>The location of the Grid Connection Corridor has been informed by the need to connect to the National Grid Drax Substation. The layout of the Grid Connection Corridor</p> <p>The Grid Connection Corridor has been designed to avoid, where practicable, sensitive receptors such as habitat designations, residential and commercial properties, heritage assets and to minimise the number of affected land interests. It has been subsequently refined based upon ongoing studies and surveys as well as feedback from consultees. Where practicable, the routing of the cables will follow field edges to minimise disturbance to agricultural land or cables will be run in the roadside.</p> <p>As the Grid Connection Corridor would be underground once operational, the majority of design considerations within this policy are not relevant.</p> <p>Construction of the cable and route would be undertaken in accordance with the Framework CEMP [EN010143/APP/7.7], which details mitigation and management measures that will be adhered to during the construction of the Scheme, ensuring it has as minimal impacts as practicable.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<ul style="list-style-type: none">b. Facilitate social inclusion, promote user friendly environments and provide safe and secure places to live and work by designing out antisocial behaviour through the creation of developments with natural surveillance having regard to Secured by Design principles. Development proposals which will generate crowds in public spaces should consider appropriate security measure in the design of buildings and spaces;c. Provide sufficient private amenity space which is appropriate to the type of development proposed ensuring proposals do not have adverse impact on overlooking, loss of privacy, light or disturbance from noise, vibration, odour or fumes;d. Make efficient use of land by not adversely affecting the potential development of a wider area of land which could otherwise be available for development. This can be achieved by ensuring that allocated sites which are built out in part, leave an access into the remainder of the site;	

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		<ul style="list-style-type: none">e. Ensure that the highest levels of sustainability are achieved through the design of buildings and by making efficient use of resources. Proposals should sufficiently consider the long-term implications of climate change such as flood risk, water supply, biodiversity and landscape, and the risk of over-heating from rising temperatures;f. Promote active travel and healthy lifestyles through the promotion of walking and cycling links and access to areas for recreation. Proposals for Major Development should be accompanied by a Health Impact Assessment Screening Checklist which will determine whether a full assessment is required;g. Make sure that adequate access and internal roads are provided to ensure safe internal vehicular movements;h. Provide connections to existing open spaces, green infrastructure networks and public rights of way outside of the development boundary;	

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Selby District Council Local Plan Publication Version	Policy SG10 - Low Carbon and Renewable Energy (Strategic Policy)	<p>i. Incorporate multi functional green infrastructure within sites to provide carbon storage and sustainable drainage systems;</p> <p>j. Provide specific and dedicated spaces for wildlife to encourage a more robust and connected network of habitats. Major development should provide integrated swift or bat bricks and hedgehog holes whilst all development should be brought forward in accordance with Building for Nature Standards or its successor;</p> <p>k. Integrate Public Art developed with the local community into all Major Development Schemes.</p> <p>Masterplans and Design codes may be required for large scale development, which will be delivered in phases. Applicants will be expected to engage positively with the Council and the local community in developing Masterplans and Design codes.</p>	<p>The Scheme will comprise the construction, operation (including maintenance), and decommissioning of a solar photovoltaic (PV) electricity generating facility with a total capacity</p>

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Consultation 2022		<p>Proposals for low carbon and renewable energy storage and generation will be supported where:</p> <ul style="list-style-type: none"> A. Planning impacts of the development and associated infrastructure, both individually and cumulatively, are, or can be made, acceptable; B. Appropriate weight, consideration and mitigation has been given to the following where applicable: <ul style="list-style-type: none"> l. Landscape character and sensitivity; m. Designated nature conservation sites, features, functionally linked land, protected habitats and species; n. Designated and non designated heritage assets and their settings; o. Hydrology and water quality; p. Impact on Infrastructure and Transport Networks including highways, rail, aviation operations, navigational systems, PROW, television, radio, telecommunications systems; 	<p>exceeding 50 megawatts (MW) and export connection to the national grid, at National Grid’s Drax Substation.</p> <p>As set out in the Statement of Need [EN010143/APP/7.1] the Scheme will be a substantial infrastructure asset, which if consented will deliver large amounts of cheap, secure and low-carbon electricity both during and beyond the critical 2020s timeframe. Maximising the capacity of generation in the resource-rich, well-connected and technically deliverable proposed location for the Scheme, represents a significant and economically rational step forwards in the fight against the global climate emergency.</p> <p>The planning impacts of the Grid Connection Corridor are considered to be acceptable, and no significant impacts are anticipated.</p> <p>The Grid Connection Corridor would not result in any significant effects on landscape character and sensitivity during operation as set out in Chapter 10: LVIA, ES Volume 1 [EN010143/APP/6.1].</p> <p>There would also be no significant effects on designated nature conservation sites, features, functionally linked land, or protected habitats and</p>

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		<p>q. Living conditions and amenity including due to noise, odour, dust, vibration, visual intrusion, shadowing or flicker.</p> <p>C. Community engagement has been undertaken which demonstrates the delivery of environmental, social and economic benefits and how concerns will be addressed/mitigated for;</p> <p>D. The site will be recovered to a safe condition, with a suitable use, to minimum of its original value and condition, within a defined and agreed period should the infrastructure cease to be operational.</p>	<p>species, as set out in Chapter 8: Ecology, ES Volume 1 [EN010143/APP/6.1]. No significant effects are anticipated for hydrology and water quality, as set out in Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 [EN010143/APP/6.1].</p> <p>There would also be no significant impact to Infrastructure and Transport Networks including highways, rail, aviation operations, navigational systems, PROW, television, radio, telecommunications systems. This set out in Chapter 13: Transport and Access, ES Volume 1 [EN010143/APP/6.1] and Chapter 16: Other Environmental Topics, ES Volume 1 [EN010143/APP/6.1].</p>
		<p>Proposals to facilitate heat recovery and delivery of community energy systems such as combined heat and power (CHP), combined cooling, heat and power (CCHP) and district heating networks should be explored where;</p> <p>r. development is in proximity to existing sources of heat generations; or</p> <p>s. there is sufficient heat density/demand to anchor loads; and</p>	<p>No impacts are anticipated on living conditions and amenity due to noise, odour, dust, vibration, visual intrusion, shadowing or flicker as a result of the operation of the Grid Connection Corridor.</p> <p>Potential significant effects have been reported in Chapter 11: Noise and Vibration, ES Volume 1 [EN010143/APP/6.1] In the event that HDD activities at the Grid Connection Corridor are required at night. However additional mitigation measures for HDD activities would be identified once a Principal Contractor has been appointed, to lower the level of</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
Selby District Council Local Plan Publication Version Consultation 2022	Policy SG11 - Flood Risk (Strategic Policy)	<p>t. provision of combined heat and power systems does not cause significant harm to heritage assets.</p> <p>To enable communities to manage, be resilient and adapt to flood risk, development will only be supported where it can be demonstrated that:</p> <ol style="list-style-type: none"> 1. The site falls within areas of lowest flood risk as set out in the most up-to-date Environment Agency flood 	<p>impact, but as these have not yet been defined. Therefore, to present a worst case, the residual effect is considered to remain significant.</p> <p>All construction activities would be undertaken in accordance with a CEMP, which will be informed by the Framework CEMP [EN010143/APP/7.7]. This will set out measures to ensure that the Grid Connection Corridor results in no significant impacts to any of the aforementioned receptors, except for noise and vibration, where a significant impact may occur, as mentioned above.</p> <p>The Scheme includes provision for decommissioning at the end of its operational life (40 years). The Framework DEMP [EN010143/APP/7.9] will be secured by a requirement in the DCO. sets out the measures the Scheme would take to ensure that the site is restored, with minimal adverse impact on amenity, landscape and biodiversity, and what opportunities will be taken for enhancement of these features.</p> <p>Chapter 9: Flood Risk, Drainage and Water Environment, ES volume 1 [EN010143/APP/6.1] and the Flood Risk Assessment (Appendix 9-3, ES Volume 2 [EN010143/APP/6.2]) sets out the flood risk from the Grid Connection Corridor and to the Grid Connection Corridor.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>risk maps and/ or Selby District’s Strategic Flood Risk Assessment (SFRA) maps</p> <ol style="list-style-type: none"> 2. The site has been passed through a sequential test as set out in the National Planning Policy Framework (minus any exempt development); or 3. Where there are no sequentially preferable sites, the site has been assessed through the application of the Exception Test as set out in the NPPF (Except any exempt development); 4. The proposal does not increase the risk of flooding off-site; and 5. In Flood Zone 3b (functional floodplain) essential infrastructure that has to be there and has passed the Exception Test, and water-compatible uses, should be designed and constructed to: <ol style="list-style-type: none"> u. i. remain operational and safe for users in times of flood; v. ii. result in no net loss of floodplain storage; 	<p>The majority of the Grid Connection Corridor is located within high and medium risk of fluvial flooding (Flood zone 2 and 3). As set out in Chapter 3: Alternatives and Design Evolution, ES Volume 1 [EN010143/APP/6.1], the majority of the land around the point of connection is flood zone 2 or 3 and as such there are no reasonable alternative routes for the Grid Connection Corridor outside of Flood Zone 2 and 3. Because of this, it is therefore necessary to apply the Exception Test.</p> <p>The Scheme will provide wider sustainability benefits by contributing to energy security, affordability and helping to achieve the government targets for Net Zero, which outweigh flood risk, and appropriate mitigation has been considered to ensure that the Scheme remains operational and is safe during times of flooding, results in no net loss of floodplain storage and will not impede water flows and no increase flood risk elsewhere. It has therefore been demonstrated that the Exception Test has been met.</p> <p>As the majority of the Grid Connection Corridor study area is in Flood Zone 2 and 3, it is considered to be at high risk, albeit protected by flood defences (Figure 9-4, ES Volume 3 [EN010143/APP/6.3]). Embedded mitigation measures would be included, which would comprise the use of HDD so that the cables will be installed under the River Ouse and</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>w. iii. not impede water flows and not increase flood risk elsewhere.</p> <p>If a site has passed the Sequential and Exception Tests the following criteria will need to be applied where viable and feasible to make it acceptable in detail:</p> <ol style="list-style-type: none"> 1. Where the development is located in areas of flood risk such as Flood Zone 2 (or higher) and does not constitute minor development or a change of use the development layout within the site will be subject to the sequential approach, with the highest vulnerability development located in areas at lowest flood risk within the site; 2. Relevant flood resilience construction methods identified through an up to date site-specific Flood Risk Assessment (FRA) should be implemented to reduce the impact and likelihood of a flood event; 3. Where the development has existing trees, woodland and/or hedgerows these should be retained where the risk of flooding from surface water has been identified 	<p>River Derwent and adjacent flood defences. This will ensure there will be no impact on the banks and bed of the watercourses, and therefore no effect on the flow regime or flooding potential of these rivers.</p> <p>With the implementation of standard construction methods and mitigation, this tidal and fluvial flood risk can be effectively managed. Therefore, flood risk from tidal and fluvial sources is considered to be not significant.</p> <p>The FRA (Appendix 9-3, ES Volume 2 [EN010143/APP/6.2]) considers pluvial flood risk from the Grid Connection Corridors. With the mitigation in place, flood risk is considered low.</p> <p>The impact of construction of the Grid Connection Corridor on groundwater flood risk is also not significant.</p> <p>Flood resilience construction methods will be implemented, and are identified in the FRA Appendix 9-3, ES Volume 2 [EN01043/APP/6.2] and Framework CEMP [EN010143/APP/7.7].</p> <p>There would be no new culverts as part of the Scheme, but existing culverts may be upgraded or slightly extended.</p> <p>The requirements of the Selby Area Internal Drainage Board have been noted and are</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>and it is possible, and if not retained the developer must agree a tree planting scheme in line with Policy NE6 where determined to be the best option to help reduce identified flood risk from surface water;</p> <ol style="list-style-type: none"> 4. The features that manage surface water are commensurate with the design of the development in terms of size, form and materials and make a positive contribution to reducing flood risk. More specific development control guidance should incorporate comments from the Lead Local Flood Authority; 5. Sustainable drainage systems (SuDS) where appropriate are incorporated in accordance with the National Planning Policy Framework and the non-statutory technical standards, but taking advice from those organisations that provide input through the planning process including the Lead Local Flood Authority, and in relevant areas the Internal Drainage Boards; 6. Hard surfaces on developments should be permeable where practicable in line with highways 	<p>incorporated into the Scheme design in terms of watercourse buffers. All necessary consents will be applied for at the relevant time from the relevant IDB covering each part of the Scheme, as set out in Chapter 9: Flood Risk, Drainage and Water Environment, ES volume 1 [EN010143/APP/6.1]. A meeting has also been held with North Yorkshire Council as Lead Flood Authority to discuss the proposed Scheme.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>guidance from North Yorkshire County Council unless proven not to be possible by site investigation;</p> <p>7. Watercourses are not culverted and any opportunity to remove culverts is taken. We also encourage that developments are suitably located away from watercourses (including culverts). This helps to ensure ongoing maintenance, inspections can be undertaken; and also any future repairs / replacement / improvement opportunities are not limited by development being located too close to those watercourses;</p> <p>8. All developments planning work in, on, under or near ordinary watercourses (including piped ordinary watercourses), or discharging surface water into a watercourse within the defined Drainage District require consent from the Board and need to have regard to all relevant byelaws;</p> <p>9. In terms of mitigation, sites should follow the relevant guidance detailed within the SFRA(s), including:</p>	

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		<ul style="list-style-type: none"> x. Setting of Finished Floor Levels; y. Management of Residual Depths, Hazards, etc; z. Consideration to the design flood event; aa. Access and Egress requirements. <p>10. In some developments, e.g. commercial/industrial, raising floor levels may not be possible due to operational requirements. In these instances alternative measures should be considered and agreed with the Environment Agency before implementation.</p>	
		<p>Where required by the NPPF and set out in Planning Practice Guidance, proposals for development should be accompanied by a site-specific Flood Risk Assessment (FRA). The need for a FRA is described in the NPPF, however Footnote 50 of the NPPF also refers to the need for the SFRA to provide guiding details for sites where a FRA will be necessary; and not just relying on the EA flood zones.</p>	

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		<p>Development allocated will not be subject to the sequential/ exception test identified in part A as it is determined through the Local Plan process that they have passed the sequential test.</p>	
<p>Selby District Council Local Plan Publication Version Consultation 2022</p>	<p>Policy SG12 Valuing the District's Historic Environment (Strategic Policy)</p>	<p>The District's heritage assets will be preserved and where appropriate enhanced in a manner commensurate to their significance. Developments which will help in the management, conservation, understanding and enjoyment of the District's historic environment, especially for those assets which are at risk, will be encouraged. Particular attention will be paid to the conservation of those elements which contribute most to the Selby District's distinctive character and sense of place. These Include: The archaeology and historic landscapes of the Magnesian Limestone Ridge and the Humberhead levels; The significant ritual and funerary sites and archaeological remains associated with Newton Kyme henge and Skipwith Common; The Roman heritage of the Tadcaster area; Medieval sites – particularly moated and manorial sites;</p>	<p>The Grid Connection Corridor would not result in any impacts to any designated or non-designated heritage assets, scheduled monuments or other nationally important archaeological sites or heritage assets or their setting as set out in Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1].</p> <p>Chapter 7: Cultural Heritage, ES Volume 1 [EN010106/APP/6.1] has identified effects to designated and non-designated assets as a result of the Scheme. All effects to designated assets are not significant.</p> <p>Chapter 7: Cultural Heritage, ES Volume 1 [EN010106/APP/6.1] identifies a significant adverse effect to the medieval moated site at Hagthorpe; a non-designated heritage asset, which is considered to be of schedulable quality, as a result of the laying of the Grid Connection Cable in the Grid Connection Corridor.</p> <p>Through the construction of the Grid Connection Cable, it is likely that there would be the permanent</p>

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		<p>The registered Battlefield at Towton and its setting; The District's significant ecclesiastical history, as exemplified by Selby Abbey, Cawood Castle and the Bishop's Canal; The District's strong industrial heritage, relating principally to mining and shipbuilding, in contrast with its largely rural character; The 19th Century farming heritage of the District; and 20th Century military remains, most notably the airfields of former RAF Riccall and RAF Church Fenton; and The District's adopted Conservation Areas.</p>	<p>removal of a very limited part of the archaeological remains.</p> <p>Potential direct impacts on buried archaeological remains will be managed through a programme of additional mitigation which may include preservation in situ, archaeological investigation and recording, and a protocol for dealing with unexpected archaeological discoveries during construction. This mitigation will be outlined in an Overarching Written Scheme of Investigation for Archaeological Mitigation which will be agreed with the archaeology officers for North Yorkshire Council.</p>
<p>Selby District Council Local Plan Publication Version Consultation 2022</p>	<p>Policy SG13 Planning Applications and the Historic Environment (Strategic Policy)</p>	<p>In submitting a planning application, applicants should ensure; A. Development affecting a heritage asset should preserve, and where appropriate, enhance those elements which contribute to its significance. B. Harm to elements which contribute to the significance of a designated heritage asset (or an archaeological site of national importance) will only be supported where this is clearly justified and outweighed by the public benefits of the proposal. Substantial harm or total loss to the significance of a designated heritage asset</p>	<p>The Grid Connection Corridor would not result in any impacts to any designated or non-designated heritage assets, scheduled monuments or other nationally important archaeological sites or heritage assets or their setting as set out in Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1].</p> <p>Chapter 7: Cultural Heritage, ES Volume 1 [EN010106/APP/6.1] identifies a significant adverse effect to the medieval moated site at Hagthorpe; a non-designated heritage asset, which is considered to be of schedulable quality, as a result of the laying</p>

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		<p>(or an archaeological site of national importance) will be permitted only in those circumstances set out in the National Planning Policy Framework.</p> <p>C. Development affecting a Conservation Area should preserve and where appropriate enhance those elements which make a positive contribution to the character or appearance of the area, including its setting, and should be in accordance with the guidance set out in adopted Conservation Area Appraisals.</p> <p>D. Development which would remove, harm, or undermine the significance of a non-designated heritage asset will only be permitted where the benefits are considered sufficient to outweigh the harm, having regard to the scale of any harm and the significance of the asset.</p> <p>E. Proposals for the sympathetic re-use of vacant and “at risk” buildings will be supported where they prevent further deterioration of the buildings condition, maintain, or enhance their significance, and support their long-term conservation.</p>	<p>of the Grid Connection Cable in the Grid Connection Corridor.</p> <p>Through the construction of the Grid Connection Cable, it is likely that there would be the permanent removal of a very limited part of the archaeological remains.</p> <p>Potential direct impacts on buried archaeological remains will be managed through a programme of additional mitigation which may include preservation in situ, archaeological investigation and recording, and a protocol for dealing with unexpected archaeological discoveries during construction. This mitigation will be outlined in an Overarching Written Scheme of Investigation for Archaeological Mitigation which will be agreed with the archaeology officers for North Yorkshire Council.</p> <p>The Heritage Statement (Appendix D to the Planning Statement [EN010143/APP/7.2]) also concludes that there would be no substantial harm to any designated heritage asset or the non designated medieval moated site which is of schedulable quality at Hagthorpe.</p>
Selby District Council Local Plan Publication Version	Policy EM4 The Rural Economy (Strategic Policy)	A. A prosperous rural economy will be supported by allowing development in the District's Smaller Villages and Open	As set out in Chapter 12: Socio-economic and Land Use, ES Volume 1 [EN010143/APP/6.1] the Scheme would result in 401 net jobs per annum during construction and would contribute to the

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Consultation 2022		<p>Countryside, including farm diversification, if it:</p> <ol style="list-style-type: none"> 1. Expands existing businesses through either the conversion of existing buildings or well-designed new buildings; or 2. Redevelops an existing or former employment site or premises; or 3. Supports the sustainable diversification of agricultural and other land-based businesses; or 4. Is related to tourism or recreation, subject to the requirements of policy EM5 or EM6. <p>B. Development within the District's Smaller Villages and Countryside will be expected to:</p> <ol style="list-style-type: none"> 1. Be of a scale commensurate with an existing use, or that reasonably required for a new use, and with the rural character of the location; and 2. Successfully mitigate any harmful impacts on the countryside, biodiversity, landscape or local character of the area; and 3. Comply with policies IC6 and not adversely impact on the local road network. 	<p>development of skills needed for the UK's transition to Net Zero by 2050 and described within the Net Zero Strategy: Building Back Greener. It is also estimated that the construction of the Scheme would contribute approximately £22.5 million to the national economy, of which £10.1m would likely be within the local area.</p> <p>The Grid Connection Corridor will be provided underground and would therefore have limited impacts on the biodiversity, landscape or local character of the area.</p> <p>It would also not result in any significant adverse impacts on the local road network in the North Yorkshire area.</p>

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Selby District Council Local Plan Publication Version Consultation 2022	Policy IC3 Protection and Creation of New Open Space, Sport and Recreation Provision (Strategic Policy)	<p>The Council will seek to protect all open space, Local Green Space and sport and recreation facilities as defined on the Policies Map which will be regularly updated using the most recent evidence base. Protecting and Enhancing existing provision</p> <p>A. Development which involves the whole or partial loss of open space, sports or recreation facilities, including playing fields, identified on the Local Plan Policies Map or a 'made' Neighbourhood Plan will only be supported where:</p> <ol style="list-style-type: none"> 1. It can be demonstrated that existing open space or recreational facilities are surplus to requirements in line with the most recent evidence base; or 2. A satisfactory replacement facility is provided, and available for use before the existing facility is lost, in a suitable location, accessible to current users, and at least equivalent, or better provision, in terms of its size, function, attractiveness and quality; or 3. Alternative sports and recreational facilities are to be replaced for alternative sports and recreational provision which aligns with the quantitative and qualitative requirements of the latest Green Space 	The Scheme does not include any proposals to build on open space, sports or recreational buildings and land.

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		<p>Audit where the benefits clearly outweigh the loss of the current provision; or</p> <p>4. Sports and recreation facilities can best be retained or enhanced through the redevelopment of a smaller part of the site.</p>	
<p>Selby District Council Local Plan Publication Version Consultation 2022</p>	<p>Policy IC6 Sustainable Transport, Highway Safety and Parking (Strategic Policy)</p>	<p>The Council will work with other authorities, stakeholders, transport providers and developers to deliver a suitable transport network and associated infrastructure which supports sustainable travel, accessible to all, and helps to deliver net zero carbon emission across Selby District. This will be achieved by:</p> <p>A. Safeguarding the long-term opportunities for waterborne and rail freight transhipment</p> <p>B. Supporting development which is located in areas:</p> <ol style="list-style-type: none"> 1. Well-served by existing walking, cycling and public transport infrastructure; 2. Accessible to all sections of the community; and 3. Provides linkages to and between developments in order to promote active travel. <p>C. Supporting development which incorporates into its design and layout:</p> <ol style="list-style-type: none"> 1. Safe pedestrian, cycling, vehicular, emergency and refuse vehicle access; 	<p>The part of the Scheme within North Yorkshire (formerly Selby District), the Grid Connection Corridor, would not include the provision of any sustainable transport network or associated infrastructure.</p> <p>The Grid Connection Cables will be located underground and will not need to be accessible to the public.</p> <p>Its construction and operation would also not result in any significant adverse impacts to the local road network in the North Yorkshire area, as set out in Chapter 13: Transport and Access [EN010143/APP/6.1].</p> <p>The Framework Public Rights of Way Management Plan [EN010143/APP/7.13] sets out how the Public Rights of Way within the Order limits will be managed during construction and operation of the Scheme. During construction, PRow routes associated with Rivers Ouse and Derwent in the Grid Connection Corridor will remain open (owing to trenchless crossing methodology).</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>2. Appropriate measures to avoid, mitigate and manage any significant impacts on highway capacity, congestion or safety, including any contribution to cumulative impacts, measures for network and traffic management, suitable crossing points, footways and dedicated provision for cyclist, equestrian and disabled users where necessary;</p> <p>3. High quality walking and cycling networks and connections to support the objectives of the Local Cycling Walking Infrastructure Plans;</p> <p>4. Improvements to the capacity and accessibility of public transport between settlements in the District and to the cities of York, Leeds and Hull;</p> <p>5. A reduction in transport carbon emissions such as through the use or support of low and ultra low emission vehicles, car clubs and rail or waterborne freight;</p> <p>6. Improvement of existing issues with the local and strategic highway network and accessibility of rural areas in line with identified and evidenced needs.</p> <p>D. Supporting development which incorporates adequate provision for parking, including:</p>	<p>The Applicant will endeavour to encourage all construction staff to use lower carbon modes of transport by identifying and communicating local bus and rail connections and pedestrian and cycle access routes to/from the Scheme and providing appropriate facilities for the safe storage of cycles, as set out in Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1].</p>

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		<p>1. Car, cycle, disabled and operational parking, in line with the requirements of the Highways Authority Interim Guidance on Transport Issues (2015) and any subsequent updates;</p> <p>2. Parking with infrastructure provision for low emission vehicles;</p> <p>3. Where development is in close proximity to existing town centres or transport hubs, lower parking requirements may be considered where:</p> <ul style="list-style-type: none">i. It can be demonstrated that other active or sustainable travel uptake can be delivered; orii. Enhancements to existing public car parking can be delivered to improve the vitality of local centres, public transport hubs or public use low carbon vehicle infrastructure <p>E. Supporting development which would not result in the loss of off-street or in-street car parking spaces unless:</p> <ul style="list-style-type: none">1. Alternative provision, for at least the same number of spaces, can be made at an appropriate location; or2. It can be demonstrated that there is no longer a requirement for the existing level of car parking.	

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Selby District Council Local Plan Publication Version Consultation 2022	Policy IC7 Public Rights of Way	<p>F. Supporting development which do not have an adverse impact on the highway network, but this may be acceptable if contributions are secured for both on and off-site mitigation as necessary; which may include requirements to provide Transport Statements, Transport Assessments and sustainable Travel Plans and post-development monitoring of traffic and mitigation measures to ensure that traffic levels agreed through the original permission are not later exceeded.</p> <hr/> <p>Development which may have an impact on a Public Right of Way network will only be supported where it can be demonstrated that:</p> <p>A. Satisfactory and alternative routes are provided, with adequate signage and the new access is of the same or better standard; and</p> <p>B. Where appropriate and viable, all reasonable opportunities for enhancement have been taken up. Enhancements can include</p> <p>1. New or improved links to the existing Public Right of Way or sustainable travel network, including public transport, especially where routes can minimise conflict.</p>	<p>The part of the Scheme within Selby District, the Grid Connection Corridor, would not include the provision of any PRow.</p> <p>It will be located underground and will not need to be accessible to the public.</p> <p>Its construction and operation would also not result in any significant adverse impacts to PRow as set out in Chapter 13: Transport and Access [EN010143/APP/6.1].</p> <p>The Framework Public Rights of Way Management Plan [EN010143/APP/7.13] sets out how the Public Rights of Way within the Order limits will be managed during construction and operation of the Scheme. During construction, PRow's routes associated with Rivers Ouse and Derwent in the Grid</p>

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Selby District Council Local Plan Publication Version Consultation 2022	Policy NE1 Protecting Designated Sites and Species (Strategic Policy)	<p>The District's internationally, nationally and locally important sites, habitats and species and irreplaceable habitats will be protected through the following principles:</p> <p>A. Relating to Irreplaceable Habitats</p> <p>1. Proposals that result in the loss or deterioration of such designated areas, (including historic wetlands and species-rich grasslands, ancient woodland, including ancient semi-natural woodland and plantations on ancient woodland, and aged or veteran trees) will be refused unless:</p> <p>i. there are wholly exceptional reasons; and</p> <p>ii. a suitable compensation strategy exists;</p> <p>B. Relating to Internationally protected habitats, and species of principle importance in England;</p> <p>Proposals that may directly, indirectly or cumulatively impact such designations will only be supported where it can be demonstrated that there will be no likely significant effects and no adverse effects on the integrity of sites and species, unless there are no alternative solutions and it is</p>	<p>2. The provision of improved facilities to make routes more accessible or attractive to users.</p> <p>Connection Corridor will remain open (owing to trenchless crossing methodology).</p> <p>The Grid Connection Corridor would not have any significant adverse effect on any internationally, nationally or locally important sites, habitats or species, including irreplaceable habitats, as set out in Chapter 8: Ecology, ES Volume 1 [EN0101/43/APP/6.1].</p>

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		<p>justified by an Imperative Reasons Overriding Public Interest assessment (IROPI) under the Habitats Directive;</p> <p>2. Development which is located within:</p> <p>i. The Lower Derwent Valley Area of Restraint must consider the guidance set out in the Lower Derwent Valley Supplementary Planning Document or its successor.</p> <p>ii. 10km of the Lower Derwent Valley Special Protection Area/Ramsar must provide evidence that proposals will not result in adverse effects on site integrity, either through evidence that the habitat is unsuitable, or through the provision of overwintering surveys and if necessary appropriate mitigation.</p> <p>C. Relating to Nationally Protected habitats and species</p> <p>1. Proposals that may either directly or indirectly negatively impact Sites of Special Scientific Interest will not be supported. The only exception will be 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;</p>	

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		<p>D. Relating to Locally Important Protected Sites and species</p> <p>1. Development which would harm a Site of Importance for Nature Conservation (SINC) (also known as Local Wildlife Sites-LWS), Local Nature Reserve or a Regionally Important Geological/geomorphological site will not be permitted unless</p> <p>i. there are no reasonable alternative means of meeting the development need, and</p> <p>ii. it can be demonstrated that there are benefits for the proposal which clearly outweigh the need to safeguard the intrinsic local nature conservation value of the site or feature and its contribution to wider biodiversity objectives and connectivity in its location.</p> <p>E. Development affecting biodiversity and geodiversity, including designated sites, protected species, habitats and species of principle importance in England, or non-designated sites or features of biodiversity interest will only be permitted where the proposal:</p> <p>1. Is justified against the relevant criteria above; and</p>	

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		<p>2. Has minimised impact, avoiding significant harm through location or design and demonstrated that where significant harm cannot be avoided, it has been demonstrated that adverse impacts will be adequately mitigated or as a last resort compensated; and</p> <p>3. It can be demonstrated that the proposed mitigation or compensatory measures are of an equivalent of better value than assigned to the original site / asset in the ecological assessment.</p>	
<p>Selby District Council Local Plan Publication Version Consultation 2022</p>	<p>Policy NE2 - Protecting and Enhancing Green and Blue Infrastructure (Strategic Policy)</p>	<p>The Council will seek to protect, maintain, enhance and, where possible, restore and extend Selby District's green and blue infrastructure assets (GBI) which will be identified through the Selby District Green and Blue Infrastructure Audit and Strategy and support the creation of an integrated network for the benefit of nature, people's health and well-being and the economy including landscapes, ecological networks, natural environment, open spaces, public rights of way, geodiversity, biodiversity, river and waterway assets.</p> <p>A. This will be achieved by supporting development which:</p> <p>1. Protects and enhances the functionality and connectivity of green and blue</p>	<p>When in operation, the Grid Connection Corridor will maintain Selby's green and blue infrastructure assets, as it will be located underground.</p> <p>During construction, the implementation of the Framework CEMP [EN010143/APP/7.7], secured through the DCO, would include measures to manage the environmental effects of the Scheme and to demonstrate compliance with environmental legislation. Accordingly, the Framework CEMP [EN010143/APP/7.7] details the measures required to mitigate any construction related effects on biodiversity, including those associated with dust deposition, air pollution, pollution incidents, water quality, light, noise and vibration.</p> <p>Mitigation measures include:</p>

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		<p>infrastructure and corridors having regard to the latest green and blue infrastructure audits and strategies. The GBI should principally benefit the development and enhance or create or facilitate links to connect to the wider network.</p> <p>2. Increases connectivity of habitats by locating features which enlarge, connect or support natural and semi-natural green spaces and protected site for nature conservation in line with Policies NE1 (Protecting Designated Sites and Species) and NE3 (Biodiversity Net Gain).</p> <p>3. Improves access to green space for recreation and leisure for the health and well-being of users having regard to the latest Green Space audit and in line with Policy NE1 (Green Space).</p> <p>4. Are in line with Policy NE5 (Protecting and Enhancing Waterbodies) where they are near to waterways, including those which contribute towards delivering identified opportunities and priorities in the latest GBI audit or strategy.</p> <p>B. Major residential development (proposals of 10 dwellings or more and non-residential development proposals of 0.5 hectares or more) will be required to provide a Green and Blue Infrastructure</p>	<p>a. Temporary fencing will allow continued movement of otter along watercourses where they have been found to be present.</p> <p>b. During construction of the Grid Connection Corridor and Interconnecting Cable Corridors, the River Derwent, River Ouse, Featherbed Drain and Watercourse DE53 (as shown on Figure 2-4, ES Volume 3 [EN010143/APP/6.3]) will be crossed using underground (HDD) techniques that would not disturb the watercourses.</p> <p>c. A minimum distance of 5 m for HDD below the riverbed to avoid noise and vibration effects is proposed.</p> <p>d. Where crossings are not required, setbacks of a minimum 10m from the water/channel edge from all watercourses/ditches (extended to a minimum of 30m for the River Derwent, River Ouse and Watercourse DE53) is considered sufficient to mitigate for potential hazards such as chemical and soils spills into watercourses and avoid potential direct impacts to watercourses, as well as species which may use them (e.g., otter). The Framework CEMP [EN010143/APP/7.7] specifies requirements for the safe storage of chemicals and other hazardous materials (e.g., fuel) reaching watercourses during flood events</p>

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		<p>Masterplan, (the detail required will be commensurate with the scale of the development) as part of the overall master plan for the development site, to be agreed with the planning authority, demonstrating (having regard to the latest green and blue infrastructure audit or strategy) how the development:</p> <ol style="list-style-type: none"> 1. Avoids loss or damage or deterioration to green and blue infrastructure; and 2. Addresses deficiencies of green and blue infrastructure; and 3. Creates or enhances green and blue infrastructure; and 4. Provides links or access to green and blue infrastructure. 	<p>during the construction phase. A full list detailing crossing methods and an explanation of these techniques is provided in Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 [EN010143/APP/6.1].</p>
<p>Selby District Council Local Plan Publication Version Consultation 2022</p>	<p>Policy NE3 - Biodiversity Net Gain (Strategic Policy)</p>	<p>The District's natural environment will be enhanced by ensuring that development delivers at least a 10% net gain in biodiversity for ecological networks including a positive contribution to the protection, creation and enhancement of habitats and species. This will be achieved by requiring;</p> <p>A. All eligible development proposals to provide delivery of at least a 10% net gain in biodiversity, by:</p> <p>B. 1. Using the Department for Environment, Food and Rural Affairs</p>	<p>For the whole Scheme, the Applicant is committed to exceeding the Government's 10% target for biodiversity net gain. A Biodiversity Net Gain (BNG) report [EN010143/APP/6.2], using Defra's Metric 4.0, has been produced for the DCO Application. This report demonstrates that the Scheme has the potential to deliver significant biodiversity net gain on the Site, with 80% gain predicted for habitat units.</p> <p>The Grid Connection Cable and Interconnecting Cable Corridors have been designed to minimise disturbance of existing vegetation and where</p>

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		<p>(DEFRA) Biodiversity Metric (or other equivalent standard as amended by national guidance or legislation) to assess the original biodiversity value of the site prior to any clearance or modification.</p> <p>2. Presenting a Biodiversity Net Gain Plan as part of the planning application process which details either on site, or off site habitat enhancement, in line with priorities for recovering or enhancing biodiversity habitats and species as set out through the Local Plan evidence bases or Nature Recovery Strategy; and</p> <p>3. Demonstrating proposals will deliver a minimum 10% net gain for biodiversity across all unit types including habitat area, hedgerows and lines of trees, rivers and streams;</p> <p>4. Commit to ensuring the delivery and maintenance/stewardship of the new habitats for at least 30 years through Section 106 agreements, conservation covenants and monitoring.</p> <p>C. In cases where there are no biodiversity opportunities identified or land is available within the district, credits from a land bank organisation can be purchased but must be evidenced as part of the pre-application process.</p>	<p>selective vegetation removal is required, replacement planting will be reinstated, where practicable.</p>

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Selby District Council Local Plan Publication Version Consultation 2022	Policy NE4 Protecting and Enhancing Landscape Character (Strategic Policy)	<p>Development which protects, enhances or restores the landscape character of Selby District and the setting of settlements for its own intrinsic value and benefit to the economic, environmental and social well-being of the District, will be supported.</p> <p>A. All development must:</p> <ol style="list-style-type: none"> 1. Promote high quality designs that respond positively to, and where possible, enhance, the distinctive local landscape character as described in the latest 'Selby Landscape Character Assessment'; and 2. Give particular attention to the design, layout, landscaping of development and the use of materials in order to minimise its impact and to enhance the traditional character of buildings and landscape in the area, reflecting the 17 character areas defined in the latest 'Selby Landscape Character Assessment'; and 3. Respect the overall development guidelines in the latest 'Selby Landscape Sensitivity Study'. <p>B. In addition, development within the four areas designated on the Policies Map as Locally Important Landscape Areas: the Magnesian Limestone Ridge (north and south); Hambleton Hough and Brayton Barff; and Derwent Valley, will only be</p>	<p>The Grid Connection Corridor would not have any impact on the landscape character of North Yorkshire (formerly Selby District) and the setting of settlements during operation, as the cables would be provided underground, so would not be visible above ground. As such, no significant impacts are anticipated in relation to landscape and visual effects.</p> <p>The location of the Grid Connection Corridor has been informed by the need to connect to the National Grid Drax Substation.</p> <p>The Grid Connection Corridor has been designed to avoid, where practicable, sensitive receptors such as habitat designations, residential and commercial properties, heritage assets and to minimise the number of affected land interests. It has been subsequently refined based upon ongoing studies and surveys as well as feedback from consultees.</p> <p>During construction, the implementation of the Framework CEMP [EN010143/APP/7.7], secured through the DCO, would include measures to manage the environmental and landscape effects of the Scheme and to demonstrate compliance with environmental legislation. Accordingly, the Framework CEMP [EN010143/APP/7.7] details the</p>

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		<p>supported where they meet the following requirements, due to their high sensitivity to inappropriate development:</p> <ol style="list-style-type: none"> 1. Avoid significant loss of key characteristics that contribute to the quality of the Locally Important Landscape Area; and 2. Respond to the specific recommendations for each Locally Important Landscape Area as set out in the Selby District Landscape Designation Review 2019 (or subsequent update). 	<p>measures required to mitigate any construction related effects on the landscape.</p>
<p>Selby District Council Local Plan Publication Version Consultation 2022</p>	<p>Policy NE5 - Protecting and Enhancing Rivers and Waterbodies (Strategic Policy)</p>	<p>The Council will work with designated bodies, developers, partners and communities to ensure opportunities for the restoration and enhancement of water bodies are realised, by ensuring that:</p> <p>A. All development likely to impact on the water environment will have regard to the Water Framework Directive (WFD) objectives set out in the Humber River Basin Management Plan (RMBP) and ensure:</p> <ol style="list-style-type: none"> 1. There is no deterioration in the water quality and status of any surface or ground water body. 2. the ability of any surface or ground waterbody to achieve Water Framework 	<p>Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 [EN010143/APP/6.1] sets out the impacts of the Scheme on water bodies and Appendix 9-3, ES Volume 2 [EN010143/APP/6.2] provides the Flood Risk Assessment for the Scheme.</p> <p>The Scheme has regard to the WFD objectives set out in the Humber River Basin Management Plan (as set out in Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 [EN010143/APP/6.1]) and Appendix 9-2 Water Framework Directive Assessment, ES Volume 2, [EN010143/APP/6.2].</p> <p>The Grid Connection Corridor spans the ‘Derwent from Elvington Beck to River Ouse’, ‘Ouse from R</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>Directive status objectives is not compromised</p> <p>3. that an improvement to the water environment is secured where possible.</p> <p>B. Developments in proximity to waterbodies, frontages, corridors and environments, will protect and enhance their existing and potential functions and characteristics by ensuring they:</p> <ol style="list-style-type: none"> 1. Include the water body or asset is an integral part of development design, 2. Avoid loss, damage or deterioration of water assets 3. Safeguard and improve the environmental quality and ecological value. 4. Protect and enhance amenity value and accessibility; 5. Contribute to the significance of heritage assets and landscape value and enhance where possible 6. Consider opportunities to mitigate for climate change or flooding; 7. Avoid the loss of existing wharfs/associated infrastructure and safeguard long-term opportunities for alternative transport options, the development of port facilities and ships' turning basins; 	<p>Wharfe to Upper Humber' and Fleet Dike WFD waterbody catchments, within which there are a number of watercourses that will require crossing.</p> <p>These crossings will be undertaken via HDD, which will avoid the need to directly impact these watercourses. Mitigation requirements, such as a site-specific hydraulic fracture risk assessment will be produced prior to commencing works to define the mitigation required based on ground conditions. Water quality monitoring will also be undertaken prior to, during, and following on from the construction activity to ensure any spillage or other pollution is identified. These will be outlined in a Water Management Plan (WMP), as secured in the Framework CEMP [EN010143/APP/7.7].</p> <p>No significant effect is reported on the River Derwent SSSI or SAC, nor on the downstream Humber Estuary SAC, SSSI, SPA and Ramsar site.</p> <p>No significant effects are also reported on Unnamed drain DE53 and Loftsome Bridge Drain, or the 11 intrusive crossings of agricultural drains and ditches (including the WFD designated Fleet Dike) which are tributaries of the River Derwent and River Ouse for the Grid Connection (see Figure 9-2 Drain Names, ES Volume 3 [EN010143/APP/6.3]).</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>8. Take into account the latest priorities and strategies for water bodies, assets and all users, including the Humber River Basin Management Plan (RBMP) and Blue and Green Infrastructure Strategies; Development for riverside recreational facilities or waterborne transport such as wharfs, ships' turning basins and ancillary facilities will be supported, provided the proposal:</p> <ol style="list-style-type: none"> 1. Will not jeopardise the commercial use of the waterway or the operation of existing businesses; 2. Provide appropriate landscape planting to safeguard the amenities of existing residents; 3. Is of a nature and scale appropriate to its location and its ability to absorb users or visitors without causing environmental damage; 	<p>There would therefore be no significant effect to potential downstream receptors including the Lower Derwent Valley SAC, SPA, NNR and Ramsar site, the Brighton Meadows SSSI or Derwent Ings SSSI.</p> <p>Overall, with the embedded mitigation measures implemented, the Grid Connection Corridor would not result in the deterioration in the water quality and status of any surface or ground water body, nor would it impede the ability of any surface or ground waterbody to achieve Water Framework Directive status objectives.</p> <p>Water quality impacts to rivers receiving baseflow, and groundwater abstractions and the SPZ down gradient are considered to have no change, and therefore no significant effects are anticipated.</p> <p>The construction and operation of the Grid Connection Corridor would seek to protect existing waterbodies, frontages, and corridors.</p> <p>The consideration of waterbodies and assets have been an integral part of the design of the Scheme as set out in the Design and Access Statement [EN010143/APP/67.3].</p> <p>The environmental quality and ecological value of the Grid Connection Corridor would be safeguarded,</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
Selby District Council Local Plan Publication Version Consultation 2022	Policy NE6 - Protecting and Enhancing Trees, Woodland and Hedgerows	<p>In order to increase and enhance the quality of trees and hedgerows:</p> <p>A. Developments will be supported where:</p> <ol style="list-style-type: none"> 1. There has been a suitable assessment of the woodland, trees and hedgerows (where deemed necessary), to a recognised professional standard which is able to demonstrate evaluation of these features for realistic long-term retention, and how this has positively informed the design process; 2. It has been clearly demonstrated how retained and new features will be protected during development; 3. There has been an appropriate replacement planting scheme agreed in 	<p>along with its amenity value and accessibility, with the avoidance of potential effects through implementation of good practice avoidance measures, such as those described within the Framework CEMP [EN010143/APP/7.7].</p> <p>The cable would lie underground therefore it would not contribute to the significance of heritage assets and landscape value.</p> <p>The Grid Connection Corridor would not jeopardise the commercial use of any waterway or the operation of existing businesses.</p> <p>An Arboricultural Impact Assessment Appendix 10-5, ES Volume 2 EN010143/APP/6.2] has been produced which has undertaken a suitable assessment of the woodland, trees and hedgerows in and around the Grid Connection Corridor.</p> <p>This has been prepared to a recognised professional standard and demonstrates the evaluation of these features for realistic long-term retention. The consideration of trees and woodland has been a consideration in the design process as set out in the Design and Access Statement [EN010143/APP/7.3].</p> <p>As a result of this, as shown in the Arboricultural Impact Assessment Appendix 10-5, ES Volume 2</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>writing with the Local Planning Authority, where the felling of trees or the removal of hedgerow is proved necessary;</p> <p>4. It prevents the loss or deterioration of woodland unless part of an agreed forestry management scheme;</p> <p>5. Any proposals for the removal of trees, woodland and/or hedgerows do not increase the risk of flooding;</p> <p>6. Proposed works to trees under Tree Preservation Orders or within a Conservation Area are not detrimental to the public realm, the character of the designated area, or to the detriment of the health and sustainability of the trees;</p> <p>7. Proposals promote and enhance the rural and urban tree coverage of the Selby District in line with the most recent strategies relating to trees, woodland and hedgerows (e.g. White Rose Forest Partnership Scheme and Conservation Area Appraisals).</p> <p>B. There will be presumption against development that results in the loss or deterioration of ancient woodland and or maturely aged, ancient or veteran trees and hedgerows.</p>	<p>EN010143/APP/6.2], there are no ancient woodland, ancient, veteran or notable trees within the Grid Connection Corridor. As such, not significant impacts are anticipated.</p> <p>In addition, as part of the design of the Scheme the following minimum buffers have been proposed where practicable:</p> <ul style="list-style-type: none"> a. 15m from woodlands (some cabling will lie within 15m of woodland); b. 10m from hedgerows increasing to 15m where there are hedgerow trees; c. 15m from individual trees; <p>Chapter 8: Ecology, ES Volume 1 [EN010134/APP/6.1] states that there would be no loss of semi-natural woodland required, and Root Protection Area incursions can be managed so that there will be no detrimental impacts on the health or amenity of retained trees. No plantation woodland that is mapped as Priority woodland will be lost during construction of the Scheme.</p> <p>Some tree and hedgerow removal will be required to facilitate construction of the Scheme, as detailed in Appendix 10-5: Arboricultural Impact Assessment and Tree Protection Report, ES Volume 2 [EN010143/APP/6.2]. There would be no</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
Selby District Council Local Plan Publication Version Consultation 2022	Policy NE7 - Air Quality	<p>A. Development will not be supported where it;</p> <ol style="list-style-type: none"> 1. Results in further significant air quality deterioration, or the need to declare further Air Quality Management Areas (AQMAs); and 2. Results in any increase in the number of people exposed to poor air quality; and 3. Conflicts with elements of an Authority Air Quality Action Plan (AQAP). <p>B. Developments will only be permitted if the impact on air quality is acceptable and mechanisms are in place to mitigate adverse impacts and prevent further exposure to poor air quality. This will help to protect human health.</p> <p>C. This will be achieved by:</p>	<p>significant adverse flood risk effects as a result of the construction or operation of the Grid Connection Corridor (see Appendix 9-3 Flood Risk Assessment, ES Volume 2, EN010143/APP/6.3).</p> <p>Tree loss will be mitigated with a robust and high quality scheme of new tree planting as detailed in the Framework LEMP [EN010143/APP/7.14]. As such, there is not anticipated to be any significant effects to hedgerows and trees.</p> <p>The Grid Connection Corridor would not result in any effects on air quality as a result of its operation, as it comprises an underground cable.</p> <p>During construction, the implementation of the Framework CEMP [EN010143/APP/7.7], secured through the DCO, would include measures to manage the environmental effects of the Scheme and to demonstrate compliance with environmental legislation. Accordingly, the Framework CEMP [EN010143/APP/7.7] details the measures required to mitigate any construction related effects including those associated with dust deposition, air pollution, and pollution incidents. As a result, no significant impacts are anticipated on air quality during the construction of the Grid Connection Corridor, and it would not affect an Air Quality Management Area.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>1. All developments promoting the uptake of low emission mitigation (such as through electric vehicle charging provision) and supporting sustainable travel to reduce air quality impacts.</p> <p>2. Developments in or affecting an Air Quality Management Area or where pre-application discussions have indicated that the development could result in the designation of an Air Quality Management Area or where the grant of planning permission would conflict with, or render unworkable, elements of the Authority Air Quality Action Plan, applicants must submit an Air Quality Assessment and/or a Dust Assessment Report and identify mitigation measures to ensure no significant adverse effects where development may:</p> <ul style="list-style-type: none"> i. Involve agricultural developments which have the potential to produce ammonia emissions and particulates which could affect residents; or ii. Create emissions of dust during demolition, earth moving and construction, or through site operations associated with mineral extraction, waste disposal or agriculture; or iii. Impact on the air quality of a Special Area of Conservation (SAC), Special 	<p>During construction, the Applicant will also endeavour to encourage all construction staff to use lower carbon modes of transport by identifying and communicating local bus and rail connections and pedestrian and cycle access routes to/from the Scheme and providing appropriate facilities for the safe storage of cycles, as set out in Chapter 6: Climate Change, ES Volume 1 [EN010143/APP/6.1].</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>Protection Area (SPA), or Site of Special Scientific Interest (SSSI), or on a non-statutory site where there is a relevant sensitivity.</p> <p>iv. Create significant amounts of traffic (the level at which it has the potential to increase local air pollution, either individually or cumulatively), as determined through a Transport Assessment and/or air quality modelling specific to a planning application; or</p> <p>D. Mitigation measures should ensure consistency with the Council’s Air Quality Action Plan and the Habitats Regulation Assessment where impacts are related to the diversity of ecosystems, and where impacts are traffic related, the North Yorkshire Local Transport Plan.</p>	
<p>Selby District Council Local Plan Publication Version Consultation 2022</p>	<p>Policy NE8 - Pollution and Contaminated Land</p>	<p>A. Development which could present noise pollution, light pollution, groundwater pollution, contamination of land or water and other environmental pollution or unstable land will not be permitted unless satisfactory remedial or preventative measures are incorporated. This will be considered an integral element of the scheme. Measures should be carried out before the use of the site commences and sufficient consideration provided to both</p>	<p>The operation of the Grid Connection Corridor would not result in any noise, pollution, light pollution, groundwater pollution, contamination of land or water and other environmental pollution, or unstable land, as it will include below ground cables.</p> <p>A Phase 1 Preliminary Risk Assessment (PRA) report has been prepared, covering land within the Order limits, and is available in Appendix 16-3, ES Volume 2 [EN101043/APP/6.2]. The information collected as part of the PRA suggest that the</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>human and environmental receptors of any potential impact. Planning applications must be accompanied by the appropriate assessments in line with the Council's Validation Checklist.</p> <p>B. Where evidence exists that a site might be contaminated, as identified through a preliminary risk assessment, or using the Yorkshire and Lincolnshire Pollution Advisory Group (YALPAG) screening assessment form, planning permission may be granted subject to conditions to prevent the commencement of development until a site investigation and assessment has been carried out and development has incorporated all measures shown in the assessment to be necessary.</p> <p>C. Development proposals should be designed to minimise the risk of erosion, subsidence and further instability, while maximising the opportunities for the reclamation, restoration and reinstatement of contaminated land.</p> <p>D. Proposals for the redevelopment or re-use of land which is known or suspected to be contaminated and also development or activities which present a significant new</p>	<p>potential risks that have been identified from potential contaminated land are very low to moderate. It concludes that no significant constraints are anticipated with regards to contamination of soil and groundwater that would limit the development of the Site for a solar PV project.</p> <p>The construction of the Grid Connection Corridor would comprise waterbody crossings to be undertaken via HDD, which will avoid the need to directly impact these watercourses. Mitigation requirements, such as a site-specific hydraulic fracture risk assessment will be produced prior to commencing works to define the mitigation required based on ground conditions. Water quality monitoring will also be undertaken prior to, during, and following on from the construction activity to ensure any spillage or other pollution is identified. These will be outlined in a Water Management Plan (WMP), as set out in the Framework CEMP [EN010143/APP/7.7] which will be secured by the DCO.</p> <p>Overall, with the embedded mitigation measures implemented, the Grid Connection Corridor would not result in the deterioration in the water quality and status of any surface or ground water body.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>risk of land contamination will be assessed having regard to:</p> <ol style="list-style-type: none">1. The findings of a preliminary land contamination or land stability risk assessment;2. The compatibility of the intended use with the condition of the land; and3. The environmental sensitivity of the site.4. The identification of human receptors and necessary mitigation <p>E. Proposals that fail to demonstrate that the intended use would be compatible with the condition of the land or which fail to secure appropriate opportunities for remediation will not be supported.</p>	<p>The proposed use of the land for underground cables is therefore considered acceptable and suitable.</p>

1.7 Table 7: Minerals and Waste Joint Plan for North Yorkshire County Council, North York Moors National Park Authority and City of York Council, 2022

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
Minerals and Waste Joint Plan for North Yorkshire County Council, North York Moors National Park Authority and City of York Council, 2022	Policy S01-Safeguarded surface mineral resources	<p>The following surface minerals resources and associated buffer zones identified on the Policies Map will be safeguarded from other forms of surface non-mineral development to protect the resource for the future:</p> <ul style="list-style-type: none"> A. All crushed rock and silica sand resources with an additional 500m buffer; B. All sand and gravel, clay and shallow coal resources with an additional 250m buffer; C. Building stone resources and active and former building stone quarries with an additional 250m buffer 	<p>Parts of the Grid Connection Corridor are located within an area of safeguarded surface mineral resource (the minerals being described as Brick Clay and Sand and Gravel) in North Yorkshire as shown in Appendix D of the Planning Statement [EN010143/APP/7.2]. Chapter 12: Socio economics and land use, ES Volume 1 [EN010143/APP/6.1] and Appendix 12-2 Communications with Minerals Planning Authorities, ES Volume 2 [EN010143/APP/6.2] explain that the impact of the Scheme on minerals was scoped out of the environmental impact assessment in agreement with the North Yorkshire Council Mineral Planning Authority.</p> <p>The mineral deposits will not be permanently sterilised by the Scheme and can be extracted, if required, after its decommissioning which will commence 40 years after the Scheme's final commissioning. The construction of the Scheme is minimally invasive and would not impact the underlying geology. In addition, due to the flat topography of the proposed site no significant earthworks are proposed.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
Minerals and Waste Joint Plan for North Yorkshire County Council, North York Moors National Park Authority and City of York Council, 2022	Policy S02 : Developments proposed within Safeguarded Surface Mineral Resource areas	<p>Within the Safeguarded Surface Minerals Resource areas shown on the Policies Map, permission for development other than minerals extraction will be granted where:</p> <ul style="list-style-type: none"> A. It would not sterilise the mineral or prejudice future extraction; or B. The mineral will be extracted prior to the development (where this can be achieved without unacceptable impact on the environment or local communities), or C. The need for the non-mineral development can be demonstrated to outweigh the need to safeguard the mineral; or D. It can be demonstrated that the mineral in the location concerned is no longer of any potential value as it does not represent an economically viable and therefore exploitable resource; or E. The non-mineral development is of a temporary nature that does not inhibit extraction within the timescale that the mineral is likely to be needed; or 	<p>Parts of the Grid Connection Corridor are located within an area of safeguarded surface mineral resource (the minerals being described as Brick Clay and Sand and Gravel) in North Yorkshire as shown in Appendix D of the Planning Statement [EN010143/APP/7.2]. Chapter 12: Socio economics and land use, ES Volume 1 [EN010143/APP/6.1] and Appendix 12-2 Communications with Minerals Planning Authorities, ES Volume 2 [EN010143/APP/6.1] explain that the impact of the Scheme on minerals was scoped out of the environmental impact assessment in agreement with the North Yorkshire Council Mineral Planning Authority.</p> <p>The mineral deposits will not be permanently sterilised by the Scheme and can be extracted, if required, after its decommissioning which will commence 40 years after the Scheme’s final commissioning. The construction of the Scheme is minimally invasive and would not impact the underlying geology. In addition, due to the flat topography of the proposed site no significant earthworks are proposed.</p> <p>The Scheme therefore demonstrates accordance with the requirement A of this policy as</p> <ul style="list-style-type: none"> - The Scheme can be constructed, operated and decommissioned without preventing the

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		<p>F. It constitutes ‘exempt’ development (as defined in the Safeguarding Exemption Criteria list), as set out in paragraph 8.55).</p> <p>Applications for development other than mineral extraction in Safeguarded Surface Minerals Resource areas should include an assessment of the effect of the proposed development on the mineral resource beneath or adjacent to the site of the proposed development.</p>	<p>mineral resource from being extracted in the future. The location for the Grid Connection Substations that may not be decommissioned is outside the mineral safeguarding area. For the Grid Connection Cable, which may also not be decommissioned, the cable trench is only up to 1.5 m wide and where practicable the route of the Grid Cables will follow field boundaries thereby not preventing the mineral within the MSA being extracted in the future; and</p> <ul style="list-style-type: none"> - The Scheme is temporary in nature being required to decommission 40 years after final commissioning so would not prejudice future extraction.
<p>Minerals and Waste Joint Plan for North Yorkshire County Council, North York Moors National Park Authority and City of York Council, 2022</p>	<p>Policy S04 Waste management facility safeguarding</p>	<p>Waste management sites identified on the Policies Map and in Appendix 2, with a 250m buffer zone, will be safeguarded against development which would prevent or unduly restrict the use of the site for waste development, unless:</p> <p>G. The need for the alternative development outweighs the benefits of retaining the site; and</p> <p>H. Where the site is in active use for waste management purposes, a</p>	<p>There are no allocated/safeguarded waste and mineral sites, or historic and permitted landfills within the Order limits. Some sites have been identified within 500 m of the Scheme; however, these sites are unlikely to be directly impacted (Brighton Authorised Landfill, New Road Historic Landfill at Drax Power Station and permitted waste sites at Drax Power Station, Brighton Airfield and Spaldington Airfield). Therefore, impacts on mineral and waste sites are not considered further in the assessment.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
Minerals and Waste Joint Plan for North Yorkshire County Council, North York Moors National Park	Policy S06 Minerals ancillary infrastructure safeguarding	<p>suitable alternative location can be provided for the displaced infrastructure; or</p> <p>I. The site is not in use and there is no reasonable prospect of it being used for waste management in the foreseeable future;</p> <p>J. The site is not viable or capable of being made viable.</p> <p>Where development, other than exempt development as defined in the Safeguarding Exemption Criteria list, as set out in paragraph 8.55 is proposed within an identified buffer zone permission will be granted where adequate mitigation can, if necessary, be provided to reduce any impacts from the existing or proposed adjacent waste uses to an acceptable level, and the benefits of the proposed use outweigh any safeguarding considerations.</p> <p>Minerals ancillary infrastructure sites identified on the Policies Map and in Appendix 2, with a 100m buffer zone, will be safeguarded against development which would prevent or unduly restrict the use of the site for minerals ancillary infrastructure purposes, unless:</p>	<p>There are no allocated/safeguarded waste and mineral sites, or historic and permitted landfills within the Order limits. Some sites have been identified within 500 m of the Scheme; however, these sites are unlikely to be directly impacted (Brighton Authorised Landfill, New Road Historic Landfill at Drax Power Station and permitted waste sites at</p>

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Authority and City of York Council, 2022		<p>K. The need for the alternative development outweighs the benefits of retaining the site; and</p> <p>L. Where minerals ancillary infrastructure is in active use on the land, a suitable alternative location can be provided for the displaced infrastructure; or</p> <p>M. The site is not in use and there is no reasonable prospect of it being used for minerals ancillary infrastructure in the foreseeable future;</p> <p>N. The site is not viable or capable of being made viable.</p> <p>Where development, other than exempt development as defined in the Safeguarding Exemption Criteria list, as set out in paragraph 8.55 is proposed within an identified buffer zone permission will be granted where adequate mitigation can, if necessary, be provided to reduce any impacts from the existing or proposed adjacent minerals ancillary infrastructure uses to an acceptable level, and the benefits of the proposed use outweigh any safeguarding considerations.</p>	<p>Drax Power Station, Brighton Airfield and Spaldington Airfield). Therefore, impacts on mineral and waste sites are not considered further in the assessment.</p>

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
Minerals and Waste Joint Plan for North Yorkshire County Council, North York Moors National Park Authority and City of York Council, 2022	Policy W01 Moving waste up the waste hierarchy	<p>1) Proposals will be permitted where they would contribute to moving waste up the waste hierarchy through:</p> <ul style="list-style-type: none"> i. the minimisation of waste, or; ii. the increased re-use, recycling or composting of waste, or; iii. the provision of waste treatment capacity and small scale proposals for energy recovery (including advanced thermal treatment technologies), which would help to divert waste from landfill. <p>2) Further capacity for the large scale recovery of energy from waste (in excess of 75,000 tonnes annual throughput capacity), including through advanced thermal treatment technologies, will only be permitted in line with Policy W04 and where any heat generated can be utilised as a source of low carbon energy or, where use of heat is not practicable, the efficient recovery of energy can be achieved.</p>	As set out in Chapter 16: Other Environmental Topics, ES Volume 1 [EN010143/APP/6.1] the Scheme will aim to prioritise waste prevention, followed by preparing for reuse, recycling and recovery and lastly disposal to landfill as per the waste hierarchy. All management of waste will be in accordance with the relevant regulations and waste will 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.

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
		<p>3) The provision of new capacity for the landfill of residual non-inert waste will be permitted where it can be demonstrated that it is the only practicable option and sufficient permitted capacity within the Plan area is not available. Proposals for the extension of time at existing permitted landfill sites with remaining void space will be supported in principle, where necessary either;</p> <ul style="list-style-type: none">O. to maintain capacity for disposal of residual waste, or;P. to achieve the satisfactory restoration of the site. <p>4) Landfill of inert waste will be permitted where it would facilitate:</p> <ul style="list-style-type: none">Q. a high standard of quarry reclamation in accordance with agreed reclamation objectives, or;R. the substantial improvement of derelict or degraded land where it can be demonstrated that the import of the waste is essential to bring the derelict or degraded land back into beneficial use and the scale of the importation would not	

Policy Document	Relevant Paragraph/Policy Reference	Policy requirement	Compliance with policy
<hr/> <p>undermine the potential to manage waste further up the hierarchy.</p>			

Appendix C Heritage Statement

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1. Introduction

- 1.1.1 East Yorkshire Solar Farm comprises the construction, operation (including maintenance), and decommissioning of ground mounted solar photovoltaic (PV) panel arrays and supporting infrastructure including electrical equipment and cabling and environmental mitigation (The Scheme).
- 1.1.2 The Scheme is proposed to be located within the administrative areas of East Riding of Yorkshire Council and North Yorkshire Council. A Grid Connection Corridor is proposed with a point of connection at the National Grid Drax Substation.
- 1.1.3 The Scheme is defined as a Nationally Significant Infrastructure Project (NSIP) and will require a Development Consent Order (DCO) from the Secretary of State for Energy Security and Net Zero (the 'Secretary of State'), due to its generating capacity exceeding 50 Megawatts.
- 1.1.4 Legislation and national planning policy considered relevant to the determination of the DCO Application identifies the need to present an assessment of harm to designated heritage assets affected by the Scheme and consider this in the decision as to whether to grant a DCO. The purpose of this Heritage Statement is to set out the assessment of harm that the Scheme may have upon designated heritage assets and non-designated asset identified as being of national significance. This assessment is used in the planning balance relating to the heritage national planning policy tests in the Planning Statement accompanying the DCO Application. This Heritage Statement therefore includes the following:
- a. The legislative and planning policy framework context for the assessment;
 - b. A summary of the results of the environmental impact assessment (EIA) undertaken to establish those assets affected by the Scheme with resultant harm to their significance; and for those assets where there is the potential for that harm to be substantial, a statement of significance is provided to explain the potential scale of the harm.
 - c. A conclusion as to whether substantial harm is caused.
 - d. Table 1 presents the level of harm for each designated heritage asset affected by the Scheme.
- 1.1.5 The EIA relating to Cultural Heritage is presented in the Environmental Statement (ES) **Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1]**. This Heritage Statement draws upon the information presented in the **ES [EN010143/APP/6.1]**.

2. Legislative and Planning Policy Framework

2.1 The Infrastructure Planning (Decisions) Regulations 2010 (as amended)

- 2.1.1 The Infrastructure Planning (Decisions) Regulations 2010 (as amended) (Ref. 1) apply to the determination of DCO applications under the Planning Act 2008. Regulation 3 requires the Secretary of State to have regard to the following when deciding an application:
- a. For an application which affects a listed building or its setting, the Secretary of State 'must have regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses'.
 - b. For an application relating to a conservation area, the Secretary of State 'must have regard to the desirability of preserving or enhancing the character or appearance of that area'.
 - c. For an application for development consent which affects or is likely to affect a scheduled monument or its setting, the Secretary of State 'must have regard to the desirability of preserving the scheduled monument or its setting'.

2.2 Ancient Monuments and Archaeological Areas Act 1979 (amended by the National Heritage Act 1983 and 2002)

- 2.2.1 The Ancient Monuments and Archaeological Areas Act 1979 (amended by the National Heritage Act 1983 and 2002) (Ref. 2) affords protection to any asset identified on the schedule of nationally important archaeological sites, known as Scheduled Monuments. Pursuant to section 33 of the Planning Act 2008, the notice and consent requirements under the 1979 Act do not apply to DCO development proposals.

2.3 Listed Building and Conservation Areas Act

- 2.3.1 The Planning (Listed Buildings and Conservation Areas) Act 1990 (Ref. 3) (excluding normal planning procedures, which are disapplied by the DCO, which if granted, would encompass all of the normal consents) requires the Secretary of State to hold a list of buildings of special architectural or historical interest, which are accorded statutory protection. In addition, it expects local planning authorities to designate conservations which are parts of their area considered to be "*areas of special architectural or historic interest, the character or appearance of which is desirable to preserve or enhance and design*".

2.4 Overarching National Policy Statement for Energy (EN-1)

- 2.4.1 The overarching NPS for Energy (NPS EN-1) (Ref. 4) was adopted in July 2011 and sets out the overall national energy policy for delivering major energy infrastructure.
- 2.4.2 Part 5 of the statement sets out guidance on generic impacts for the Applicant's assessment and decision-making on the application. These impacts concern, amongst other matters, the historic environment. The document sets out a phased progression to the heritage assessment, emphasising the need to understand the significance of a heritage asset and the contribution of their setting to that significance (paragraph 5.8.8) before assessing the extent to which that significance is impacted.
- 2.4.3 When assessing impact, NPS EN-1 (Ref. 4) identifies the potential for the significance of an asset to be harmed or lost through development. Paragraph 5.8.14 states that '*loss affecting any designated heritage asset should require clear and convincing justification*'. This harm is described in terms of substantial harm or loss of significance. A distinction is given between substantial harm to or loss of a grade II listed building, park or garden which should be exceptional and substantial harm to or loss of designated assets of the highest significance, including Scheduled Monuments; registered battlefields; grade I and II* listed buildings; grade I and II* registered parks and gardens; and World Heritage Sites, which should be wholly exceptional.
- 2.4.4 Paragraph 5.8.15 (Ref. 4) provides guidance on how harm should be weighed within the planning balance and states '*Any harmful impact on the significance of a designated heritage asset should be weighed against the public benefit of development*'. This recognises that a scale needs to be employed so that the greater the harm to the significance of the heritage asset the greater the justification will be needed for any loss. The document is clear that consent should be refused for any scheme which will lead to substantial harm to or total loss of significance of a designated heritage '*unless it can be demonstrated that the substantial harm to or loss of significance is necessary in order to deliver substantial public benefits that outweigh that loss or harm*'.
- 2.4.5 NPS EN-1 (Ref. 4) defines assets with archaeological interest not currently designated, but which are demonstrably of equivalent significance to scheduled monuments (paragraph 5.8.4). This definition includes those assets which have 'yet to be formally assessed for designation'. When such an asset is identified as being affected by a development, paragraph 5.8.5 makes it clear that the same policy considerations should be applied as those that apply to designated assets. This is applicable to the Scheme as one non designated asset of schedulable quality has been identified.

2.5 Draft Overarching National Policy Statement for Energy (EN-1)

- 2.5.1 The Government is currently reviewing and updating the Energy NPSs. It is doing this in order to reflect its policies and strategic approach for the energy system that is set out in the Energy White Paper (Ref. 5) (December 2020),

and to ensure that the planning policy framework enables the delivery of the infrastructure required for the country's transition to net zero carbon emissions.

- 2.5.2 Draft NPS EN1 (Ref. 6) was published for consultation on 30 March 2023 and this document is yet to be finalised or designated. It is considered that this is likely to be an important and relevant matter to the Secretary of State's decision.
- 2.5.3 Draft NPS EN-1 Paragraph 5.9.26 (Ref. 6) directs the Secretary of State to 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. 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'*.
- 2.5.4 Draft NPS EN-1 in paragraph 5.9.27 (Ref. 6) states that *'Substantial harm to or loss of significance of a grade II Listed Building or a grade II Registered Park or Garden should be exceptional'*. It goes on to state in 5.9.28 that *'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'*.
- 2.5.5 Paragraph 5.9.29 (Ref. 6) further adds that *'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 by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible the harm or loss is outweighed by the benefit of bringing the site back into use'*
- 2.5.6 At paragraph 5.9.30 (Ref. 6) it states that *'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.'*
- 2.5.7 Paragraph 5.9.6 (Ref. 6) also requires that *'non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to Scheduled Monuments should be considered subject to the policies for designated heritage assets. The absence of designation for such heritage assets does not indicate lower significance'*.

2.6 Planning Practice Guidance

- 2.6.1 Further clarity on the interpretation of harm is provided within the Planning Practice Guidance (Ref. 7). Although relating to the policy outlined within the

National Planning Policy Framework (NPPF) (Ref. 8), it is transferable to the policy contained within the National Policy Statement for Energy.

- 2.6.2 The Planning Practice Guidance expands on terms such as ‘significance’ and its importance in decision making. Paragraph 018 (Ref. 7) states ‘What matters in assessing whether a proposal might cause harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset’s physical presence, but also from its setting. Proposed development affecting a heritage asset may have no impact on its significance or may enhance its significance and therefore cause no harm to the heritage asset. Where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or substantial harm (which includes total loss). Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated’.
- 2.6.3 Paragraph 018 (Ref. 7) emphasises that substantial harm is a high test and it is important to consider whether an adverse impact ‘seriously affects a key element’ of an asset’s significance. It is the degree of harm to the asset’s significance rather than the scale of the development that is to be assessed (paragraph 018).
- 2.6.4 The PPG states that in relation to setting, a thorough assessment of the impact on setting needs to take in to account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it (paragraph 013).
- 2.6.5 The PPG (Ref. 7) indicates that the degree of harm should be considered alongside any public benefits that can be delivered by development. The PPG states that these benefits should flow from the Scheme and should be of a nature and scale to be of benefit to the public and not just a private benefit and would include securing the optimum viable use of an asset in support of its long-term conservation (paragraph 020).

2.7 Historic England Guidance

- 2.7.1 Managing Significance in Decision Taking in the Historic Environment: Historic Environment Good Practice Advice Note 2 (GPA2, 2015; (Ref. 9) contains Historic England’s guidance on implementing historic environment policy contained within the PPG. GPA2 emphasises the importance of having a knowledge and understanding of the significance of heritage assets likely to be affected by the development and that the ‘first step for all applicants is to understand the significance of any affected heritage asset and, if relevant, the contribution of its setting to its significance’ (paragraph 4). With regard to harm, the document clarifies that change to heritage assets is inevitable, but that the change is only harmful when significance is damaged and that ‘[t]he nature and importance of the significance that is affected will dictate the proportionate response to assessing that change’ (paragraph 29). The document reiterates that substantial harm is a high test (paragraph 27).

3. Assessment

3.1 Methodology

- 3.1.1 All designated heritage assets which have been assessed in the EIA as experiencing an adverse effect have been considered within this Statement along with one non-designated asset of schedulable quality.
- 3.1.2 Adverse effects can be experienced as a direct physical impact on historic fabric, or an effect as a result of changes to an asset's setting. Effects can also be experienced during the construction of the Scheme as short-term, or long-term impacts, or as a result of the operation of the Scheme.
- 3.1.3 While there is no direct correlation between the significance of effect in EIA terms and the degree of harm referenced in national planning policy, it is acknowledged that those assets which are identified as experiencing a significant adverse effect are more likely to experience substantial harm.
- 3.1.4 All designated heritage assets presented in **Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1]** have been assessed and effects during construction, operation and/or decommissioning identified as negligible to minor adverse which are not considered significant. It is therefore concluded that the harm caused to these assets falls within the less than substantial category and at the lower level of the spectrum. In accordance with planning guidance and Historic England advice, a proportionate approach has been taken and these assets are not discussed further, however, they are listed in Table 1 of this Statement. The reader is directed to **Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1]** for a full consideration of the impacts to these assets and Table 1 of this Statement for the categorisation of harm.
- 3.1.5 This Statement, therefore, provides further assessment of the non-designated heritage asset of schedulable quality where a significant adverse effect has been identified in order to understand where on the harm spectrum this impact falls.
- 3.1.6 The emphasis is placed on the level of impact for the purposes of this Heritage Statement. This is consistent with the NPS. 'Effect' is a purely EIA term which balances the impact of a development on the heritage significance of an asset. Harm is associated with the impact on the asset and is not influenced by an asset's heritage value.
- 3.1.7 This Statement considers further the significance of the non-designated asset of schedulable quality to enable an understanding of how the impact is experienced. There follows a discussion of the impact of the Scheme on the identified significance, or on the ability to perceive that significance, and the resultant level of harm taking into consideration mitigation.
- 3.1.8 The conclusion outlines the level of harm and the significance of the non-designated heritage asset of schedulable quality affected by the Scheme, in accordance with national planning policy and guidance.

3.2 Statement of Significance

- 3.2.1 As reported within **Chapter 7: Cultural Heritage, ES Volume 1 [EN010143/APP/6.1]**, there are no designated assets which have been identified as experiencing significant adverse effects on their heritage value.
- 3.2.2 The medieval settlement of Hagthorpe, contains a non-designated medieval moated site which, given the current available information, is considered to be of schedulable quality and therefore should be treated as nationally significant under Paragraph 5.8.4 of NPS EN-1.
- 3.2.3 The medieval settlement of Hagthorpe (MNY10601) is named in the summary of the Domesday Book and is recorded in the North Yorkshire Council HER as lying just to the south of the Grid Connection Corridor. The adjacent road, the A63, appears to run along the original medieval route between the two ecclesiastical centres of Selby and Howden. Along with the moated site and fishponds at Hagthorpe (MNY10603), as well as an associated chapel (MNY10604), this set of archaeological assets forms a distinct grouping of medieval settlement features within the landscape, albeit one which is poorly understood. These features are suggestive of the potential for this part of the Grid Connection Corridor to host the remains of associated medieval settlement and agriculture, as well as the significant, albeit denuded, remains of the higher-status moated site at Hagthorpe (MNY10603).

3.3 Harm Assessment

- 3.3.1 The medieval settlement of Hagthorpe (MNY10601) contains a non-designated medieval moated site, the extent of which is uncertain, and which may extend into the Grid Connection Corridor for the Scheme. The insertion of the Grid Connection Cable will involve an open cut trench in this area, which has the potential to physically remove part of any medieval remains related to the site, which may or may not be present. Should such remains be present, given their potential associations to the high-status medieval site, their value may reasonably be expected to be **high / medium**.
- 3.3.2 Construction of the Scheme would likely result in the permanent removal of a very limited part of the archaeological remains. This is due to the fact that the cable trench will be of a limited scale, and associated construction activity can be undertaken in a manner which will be no more impactful than the existing agricultural regime carried out over this area. Nonetheless, this removal represents a permanent loss of part of the asset's archaeological interest and has been reported within the ES as a moderate adverse effect, which is considered to be significant.
- 3.3.3 Potential direct impacts on buried archaeological remains will be managed through a programme of additional mitigation which includes preservation in situ, archaeological investigation and recording, and a protocol for dealing with unexpected archaeological discoveries during construction. The guiding principles and methodology for the planning and implementation of the archaeological mitigation will be set out in an Overarching Written Scheme of Investigation for Archaeological Mitigation, which will be agreed with the archaeology officers for East Riding of Yorkshire Council and North Yorkshire Council.

- 3.3.4 Archaeological excavation and recording would not reduce the physical impact to these assets, as the archaeological evidence would still be removed, but would compensate for their loss by preserving them by record; thereby allowing their continued study and achieving greater understanding and appreciation of their heritage value and that of the wider medieval settlement.
- 3.3.5 Within the NPS EN-1 (paragraph 5.8.14) (Ref. 4); substantial harm is addressed alongside total harm. The associated planning policy guidance (paragraph 018) acknowledges that this is a high test. The removal of part of the remains associated with the medieval settlement at Hagthorpe will not equate to the total loss of heritage value. The loss will be limited and the ability to appreciate and understand the historic and archaeological interest of the site will be retained. The harm is, therefore, considered to be less than substantial. As such, paragraph 5.9.30 of EN-1 should be applied.

3.4 Conclusion

- 3.4.1 The NPS EN-1 and Draft NPS EN-1 require an assessment of harm to heritage significance. The draft NPS further categorises that harm into 'substantial' and 'less than substantial'. The PPG expects potential harm to designated heritage assets to be categorised as either less than substantial harm or substantial harm (which includes total loss) and that within each category of harm identified, the extent of the harm should be clearly articulated.
- 3.4.2 **Chapter 7: Cultural Heritage, ES Volume 1 [EN010106/APP/6.1]** has identified effects to designated and non-designated assets as a result of the Scheme. All effects to designated assets are not significant and can be reasonably equated with less than substantial harm, at the lower end of the spectrum. **Chapter 7: Cultural Heritage, ES Volume 1 [EN010106/APP/6.1]** identifies a significant adverse effect to the medieval moated site at Hagthorpe; a non-designated heritage asset, which is considered to be of schedulable quality, as a result of the laying of the Grid Connection Cable in the Grid Connection Corridor. Significant effects have a greater potential to represent substantial harm and have, therefore, been assessed in this Statement.
- 3.4.3 Through the construction of the Grid Connection Cable, it is likely that there would be the permanent removal of a very limited part of the archaeological remains. The overall change does not constitute substantial harm to the significance of the asset as a whole and therefore less than substantial harm to the significance of this asset as result of the Scheme is concluded. Potential direct impacts on buried archaeological remains will be managed through a programme of additional mitigation which may include preservation in situ, archaeological investigation and recording, and a protocol for dealing with unexpected archaeological discoveries during construction. This mitigation will be outlined in an Overarching Written Scheme of Investigation for Archaeological Mitigation which will be agreed with the archaeology officers for East Riding of Yorkshire Council and North Yorkshire Council.

4. References

- Ref. 1 HMSO (2010) Infrastructure Planning (Decisions) Regulations 2010. Available at: <https://www.legislation.gov.uk/ukdsi/2010/9780111490266/contents> [Accessed 21 August 2023]
- Ref. 2 HMSO (1979); Ancient Monuments and Archaeological Areas Act 1979. Available at: <https://www.legislation.gov.uk/ukpga/1979/46> [Accessed 21 August 2023]
- Ref. 3 HMSO (1990) Planning (listed Buildings and Conservation Areas) Act 1990. Available at: <https://www.legislation.gov.uk/ukpga/1990/9/contents> [Accessed 21 August 2023]
- Ref. 4 DECC (2011) Overarching National Policy Statement for Energy (EN-1). Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/47854/1938-overarching-nps-for-energy-en1.pdf [Accessed 21 August 2023]
- Ref. 5 HSMO (202). Energy White Paper: Powering our Net Zero Future. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/945899/201216_BEIS_EWP_Command_Paper_Accessible.pdf [Accessed 21 August 2023]
- Ref. 6 Department for Energy Security & Net Zero (2023). Overarching National Policy Statement for Energy (EN-1). Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1147380/NPS_EN-1.pdf. [Accessed 09 August 2023]
- Ref. 7 Ministry of Housing, Communities and Local Government (2019) Planning Practice Guidance. Available at: <https://www.gov.uk/government/collections/planning-practice-guidance> [Access 21 August 2023]
- Ref. 8 Ministry of Housing, Communities and Local Government (MHCLG) (2019) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Accessed 21 August 2023]
- Ref. 9 Historic England (2015) Historic Environment Good Practice Advice in Planning Note 2. Managing Significance in Decision Taking in the Historic Environment. Available at: <https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/gpa2/> [Accessed 21 August 2023]

Table 1. Effects as reported in Environmental Statement and Harm Category Assessment Summary

Designation	Description	Description of Impact	Significance of effect with embedded mitigation	Additional Mitigation/Enhancement Measure	Residual effect after mitigation	Harm category assessment
Designated Heritage Asset-Grade II listed buildings, (1148458)	Hagthorpe Hall	Temporary - Noise from construction machinery during construction within Grid Connection Corridor Temporary - Noise from decommissioning machinery during works within Grid Connection Corridor	Negligible – not significant	N/A	Negligible (not significant)	Less than Substantial
Designated Heritage Asset-Grade II listed buildings, (1148459)	Hagthorpe stables	Temporary - Noise from construction machinery during construction within Grid Connection Corridor	Negligible – not significant	N/A	Negligible (not significant)	Less than Substantial
Designated Heritage Asset-Grade II listed building (1168001)	Derwent View	Temporary - Noise from construction machinery during construction within Grid Connection Corridor	Negligible – not significant	N/A	Negligible (not significant)	Less than Substantial

Designation	Description	Description of Impact	Significance of effect with embedded mitigation	Additional Mitigation/Enhancement Measure	Residual effect after mitigation	Harm category assessment
Designated Heritage Asset-Grade II listed building (1083172)	Rowland Hall	Temporary - Noise from construction machinery during construction within Grid Connection Corridor	Negligible – not significant	N/A	Negligible (not significant)	Less than Substantial
Designated Heritage Asset-scheduled monument (1016857)	Drax Augustinian priory	Temporary - Noise from construction machinery during construction within Grid Connection Corridor Temporary - Noise from decommissioning machinery during works within Grid Connection Corridor	Minor adverse– not significant	N/A	Minor adverse (not significant)	Less than Substantial
Designated Heritage Asset-Scheduled Monument (1005210) Including Grade I listed ruins (1083170)	Wressle Castle	Temporary – Impact to an element of setting through the presence of a Temporary construction and decommissioning compound within key view to and from the castle	Minor adverse– not significant	N/A	Minor adverse (not significant)	Less than Substantial

Designation	Description	Description of Impact	Significance of effect with embedded mitigation	Additional Mitigation/Enhancement Measure	Residual effect after mitigation	Harm category assessment
Non designated Heritage Asset of schedulable quality (MNY10603)	Hagthorpe moated site	Potential permanent impact resulting in partial loss of archaeological interest	Moderate adverse - significant	Archaeological evaluation and, where necessary, mitigation works. Depending upon the nature and extent of the archaeology, measures to reduce the impact of construction can be designed.	Minor adverse – not significant	Less than Substantial

Appendix D Mineral Plan Policies Maps



East Riding Local Plan Policies Map (Adopted 2016)

Administrative Boundaries



Minerals Safeguarding Areas (EC6)



Realignment Sites (ENV6)

Registered Parks and Gardens (ENV3)

Open Space (C3)

Local Plan Allocations

Minerals Safeguarding Areas (EC6)



Postal code, Name or Address



- Rail and wharves 100m buffer 2020
- Minerals Resource Safeguarding | Potash, Polyhalite and Salt Supply Policy - M22
- NYMNP_Polyhalite_2020
- Minerals Resource Safeguarding | Safeguarded Surface Mineral Resource Policy S01, S02 & S07
- NYMNP_Saltwick_Cloughton_buffer_2020
- NYMNP_Building_Stone_Saltwick_Cloughton_2020
- NYMNP_Sand_and_Gravel_Resource_2020
- Building_stone_2020
- NYMNP_Sand_and_Gravel_250m_buffer_2020
- NYMNP_Limestone_Resource_500m_buffer_2020
- NYMNP_Limestone_Resource_2020

Electronic interpretation of the Policies Map

[Contact map team](#)

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