EAST YORKSHIRE SOLAR FARM

East Yorkshire Solar Farm

EN010143

Responses to the Examining Authority's Written Questions for Deadline 1

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b. Environmental Statement (2 questions);
c. The Scheme (5 questions);
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1.2 Responses to ExA Written Questions

Table 1-1. Responses to ExA Written Questions

ExQ1	Respondent	Question	Applicant's Response
1.	**General and Cross-topic Questions**		
1.0			
Q1.0.1	The Applicant and LPAs	The Overarching National Policy Statement for energy (EN-1) and National Policy Statement for renewable energy (EN-3) were published in January 2024. They update the 2011 versions of EN-1 and EN-3 referenced in the application submissions. Please set out any implications for the consideration of the proposal arising from the updated NPSs.	The Applicant welcomes the designation in January 2024 of the updated Overarching National Policy Statement for Energy (EN-1) and the National Policy Statement for Renewable energy (EN-3). The East Yorkshire Solar Farm Application was submitted on 20 November 2023 and was accepted for examination on 19 December 2023. The Applicant notes that at paragraph 1.6.3 the Overarching National Policy Statement for Energy (NPS EN-1) is clear that the latest amendments only have effect for DCO applications accepted for examination after the designation of the amendments, which was 17 January 2024. It still therefore remains that the Application is to be determined under Section 105 of the Planning Act 2008 as discussed in section 2 of the Planning Statement **[APP-232]**. Paragraph 1.6.3 of NPS EN-1 does however acknowledge that the updated suite of energy NPSs are capable of being important and relevant considerations in the decision making process for those applications where the NPSs do not have effect, such as the Applicant's Application. As discussed at paragraph 2.2.18 of the Planning Statement **[APP-232]**, the Applicant considers the relevant policies of the updated suite of energy NPSs to be important and relevant considerations and have significant weight in the decision making process given that they reflect and take account of the Government's latest renewable energy policy. The Overarching National Policy Statement for Energy (NPS EN-1) sets out the need for nationally significant energy infrastructure to deliver the Government's targets for the decarbonisation of energy generation, increase the affordability of energy and provide energy security and now includes solar generation, which the previous 2011 designated suite of energy NPS policy did not specify. The National Policy Statement for Renewable Energy (NPS EN-3) also includes specific policies relating to the development of large scale ground mounted solar photovoltaic energy projects such as the Scheme. NPS EN-3 at paragraph 2.10.9 states that 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 by 2050. As such, solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector" and paragraph 2.10.10 explains that the Government "expects a five-fold increase in combined ground and rooftop solar deployment by 2035 (up to 70GW)". Paragraphs 3.2.6 to 3.2.8 of NPS EN-1 are set out in bold within NPS EN-1 and explain that applications for development of the type of infrastructure set out in the NPS, therefore including solar, should be assessed on the basis that the Government "has demonstrated that there is a need for those types of infrastructure which is urgent" and that "substantial weight should be given to this need when considering applications". Furthermore, "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."

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			NPS EN-1 also introduces the classification of infrastructure that is "Critical National Priority (CNP)". NPS EN-1 section 4.2 explains that the Government has concluded that there is a CNP to provide nationally significant low carbon infrastructure. Section 4.2 of NPS EN-1 specifies which energy technologies are considered to be low carbon and therefore CNP; this includes all onshore and offshore generation that does not involve fossil fuel combustion. Solar is classified as CNP and the Scheme is therefore CNP infrastructure. Paragraph 4.2.16 of NPS EN-1 sets out that CNP infrastructure is to be treated as if it has met any tests which are set out within the NPS or any other planning policy, which requires a clear outweighing of the harm, exceptionality or very special circumstances, as the starting point for the Secretary of States decision making. Paragraph 3.3.63 of NPS-EN-1 also states that the CNP for low carbon infrastructure will "in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy." This confirms that with respect to this policy test, that the bar is high, where the impacts of a CNP infrastructure scheme would be required to outweigh need and benefits overall in order for consent to be refused. Paragraph 4.1.3 of NPS EN-1 specifies the presumption in favour of granting consent to applications for energy NSIPs that are identified as CNP infrastructure, due to the level and urgency of need for such infrastructure, "unless any more specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused". Paragraph 4.1.7 of NPS EN-1 also adds that: "For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases." The Applicant considers that these changes to NPS EN-1 and NPS EN-3 further strengthen the need case for, and the urgency to deliver, the Scheme, and that the need case for the Scheme does not need to be the subject of further inquiry as part of the examination of the Application. Furthermore, the environmental impacts of the Scheme, which have been assessed as reported in the ES and discussed in the Planning Statement **[APP-232]** demonstrate that overall, with the mitigation hierarchy being followed, and the mechanisms to secure this mitigation being implemented, the Scheme will have limited and localised residual significant adverse effects during its 40 year operation .These limited and localised effects are outweighed by the significant national benefits that the Scheme will provide, as supported by the general presumption in favour of granting consent for CNP infrastructure set out in NPS EN-1 discussed above. The Applicant has prepared a table of the Scheme's accordance with the relevant policies of the designated January 2024 energy NPSs, which includes policies within NPS EN-1, NPS EN-3 and National Policy Statement for Electricity Networks Infrastructure (NPS EN-5) This is provided at Appendix A of this response to the ExA's first written questions. In summary, the Scheme will provide infrastructure that is a CNP where the need is already established and for which the presumption in favour of granting development consent is engaged. In accordance with NPS EN-1, substantial weight should be given to the need for the Scheme, and its status as CNP infrastructure in the Secretary of State's decision making.

ExQ1	Respondent	Question	Applicant's Response
1Q1.0.2	The Applicant and LPAs	On 15 May 2024 the Secretary of State for Energy Security and Net Zero made a written ministerial statement (WMS) entitled 'Solar and protecting our Food Security and Best and Most Versatile (BMV) Land'. Please set out any implications for the consideration of the proposal arising from this WMS.	The Applicant notes that the WMS dated 15 May 2024 is regarding solar development and balancing the need for this type of development to deliver low carbon and secure electricity with the need to protect food security and the best and most versatile agricultural land. The WMS discusses the following matters: Protecting the Best Agricultural Land; Addressing Cumulative Impacts; Improving Soil Surveys; and Supporting solar on rooftops and brownfield sites which the Applicant has considered in its response below. Protecting the Best Agricultural Land In accordance with NPS EN-1 5.11.3, NPS EN-3 paragraph 2.10.29 and the WMS as part of its site selection process for the Solar PV Site described in ES Chapter 3: Alternatives and Design Evolution **[APP-055]**, the Applicant has sought to utilise suitable previously developed land; brownfield land which includes contaminated land and non agricultural land, and did not identify any available land of this type within its initial area of search or within the refined area of search of an appropriate size to locate the Solar PV Site for the Scheme. ES Figure 3-2 **[APP-141]** illustrates the provisional agricultural land use mapping within the refined area of search and shows there is no non agricultural land within this area. Furthermore, as discussed in ES Chapter 3: Alternatives and Design Evolution **[APP-055]**, the Applicant's review of the local planning authority brownfield register and local knowledge at the time did not identify any brownfield sites which were of a suitable size and location for the Scheme. The Scheme will utilise the developed land at Johnson's Farm for its operations and maintenance hub. In accordance with NPS EN-1 paragraph 5.11.12 and NPS EN-3 paragraph 2.10.29 as part of its site selection process the Applicant has taken a sequential approach to the use of agricultural land considering whether land of lower grade is available and suitable. This approach led the Applicant to identify low and medium grade agricultural land for the majority of the Solar PV Site and did not identify any alternative land which would be of lower grade agricultural land that was available or considered suitable for the Scheme to meet its objectives. Through this process the amount of higher grade (BMV) land used for the Solar PV Site has been minimised with only 7.1% of the Solar PV Site being of BMV quality. The Applicant acknowledges that low and medium grade agricultural land will be used for the Scheme but with regard to protecting food security highlighted in the WMS, the Applicant's discussions with farmers who farm areas of the Solar PV Site have also identified that this land is difficult to farm due to climatic factors and that this land is not always farmed to produce food for human consumption, instead being used for animal feed and for biomass purposes. The vast majority of agricultural land within the Order limits would also be available for return to its existing agricultural use following decommissioning of the Scheme. Chapter 15: Soils and Agricultural Land within the Environmental Statement **[APP-067]** concludes that a very small amount (0.41 ha) of BMV Subgrade 3a agricultural land for tree planting would be permanently removed from agricultural use but would provide a permanent ecological benefit. In relation to non-BMV land, 8.97 ha of Subgrade 3b agricultural land would be permanently removed from agricultural use as a result of tree and hedge planting, and further 2 ha of Subgrade 3b agricultural land would be permanently removed as a result of the potential retention of the Grid Connection Substations and associated accesses. In addition, the conversion of arable land to grassland during the 40 year operational period has the potential to accrue improvement to soil function over a large area.

ExQ1	Respondent	Question	Applicant's Response

In summary the Applicant has sought to use previously developed land and other non agricultural land and where this was not possible has given preference to the use of poorer quality agricultural land in determining the areas of land which form the Solar PV Site. In achieving this the Applicant has minimised the use of best and most versatile agricultural land by the Scheme therefore protecting this valuable resource in accordance with the National Policy Statement for Energy and the WMS.

Addressing cumulative impacts

The Applicant recognises that there are solar development proposals in various areas of the UK and that some areas have several proposals in close proximity.

In its assessment of cumulative impacts of the Scheme with other existing and red line bs, the Applicant has identified other solar developments in the vicinity of the Scheme to consider as part of the assessment. This is set out in chapters 6 – 16 of the Environmental Statement **[APP-058 to APP-061, AS-014, APP-064 to APP-067, and AS016]** and is summarised in Chapter 17: Cumulative Effects and Interactions of the Environmental Statement **[APP-069]**. The assessment concludes that no new likely significant adverse effects are anticipated to arise from the Scheme when considered alongside those effects generated by nearby developments. Section 15.10 of Chapter 15: Soils and Agricultural Land, ES Volume 1 **[APP-067]** assesses the potential effects of the Scheme in combination with other proposed solar farms close to the Scheme. The Chapter concludes that approximately 20ha of BMV is estimated to be permanently lost due to the Scheme and the cumulative solar developments together. This comprises approximately 0.01% of the BMV in East Riding of Yorkshire and the former Selby District Council. Therefore, no significant adverse effects to soils or agricultural land are predicted to occur as a result of the Scheme cumulatively. The assessment identifies that the Scheme is anticipated to have a significant beneficial effect upon the functional improvement of soil resources that would follow with the conversion of arable land to grassland when considered with the other solar development in the area.

Improving soil surveys

The WMS sets out the requirement for Agricultural Land Classification Soil Surveys to be of a high standard, requiring surveyors to demonstrate meeting an agreed minimum requirement of training/experience. It also seeks to ensure consistency in how data is recorded and presented, so that reports on agricultural land classification are consistent, authoritative and objective.

To confirm the quality of the soil resource within the Solar PV Site and Ecology Mitigation Area, the Applicant commissioned a soil and Agricultural Land Classification survey within these area by experienced independent soil specialists (Land Research Associates, LRA). The Soil and ALC Survey Report is included as Appendix 15-3 **[APP-118]**. As part of discussions with Natural England with respect to soils, the methodology of this survey has been agreed and meets Natural England's recommended survey guidance demonstrating the survey has been conducted to a high standard.

Supporting solar on rooftops and brownfield sites

The Applicant notes the WMS highlights the deployment of rooftop solar remains a priority for Government.

As discussed in the Applicant's Statement of Need **[APP-232]** the Applicant recognises that decentralised energy generation on roof tops has an important role to play in decarbonisation, however wishes to highlight that on its own, smaller scale solar, including rooftop solar, is not likely

ExQ1	Respondent	Question	Applicant's Response
			to deliver a sufficient total capacity at the required pace and at an affordable cost to meet the Government's targets therefore large scale ground mounted solar is required alongside rooftop deployment.
Q1.0.3	The Applicant	On 30 April 2024 the Government issued an updated suite of National Infrastructure Planning Guidance. Please comment on any implications of the updated Guidance for the application proposal.	The Applicant welcomes the publication of an updated suite of National Infrastructure Planning Guidance (NIPG) which includes the following documents: (a) Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects (April 2024) (b) Planning Act 2008: Fast-track process for Nationally Significant Infrastructure Projects (April 2024) (c) Planning Act 2008: Content of a Development Consent Order for Nationally Significant Infrastructure Projects (April 2024) (d) Planning Act 2008: Acceptance stage for Nationally Significant Infrastructure Projects (April 2024) (e) Planning Act 2008: Pre-examination stage for Nationally Significant Infrastructure Projects (April 2024) (f) Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects (April 2024) (g) Planning Act 2008: Infrastructure Planning (Fees) Regulations 2010 - cost recovery by the Planning Inspectorate and public authorities (April 2024) . Given the date of publication of the NIPG and the commencement of the examination for the East Yorkshire Solar Farm on 21 May 2024 the Applicant considers that the majority of the updated guidance is for the pre application and acceptance/pre examination parts of the DCO process and therefore this guidance does not have any implications for the Application. The Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects (April 2024) is of relevance to the Application. The Applicant is engaging with the examination process set out in this guidance including activities such as publicising hearings however it recognises that guidance which relates to the Infrastructure Planning (Examination Procedure) (Amendment) Rules 2024 does not apply to the examination of the Application due to the timing of the legislation coming into force and the date of the Application being accepted. In accordance with paragraph 019 Reference ID 07-019-20240430 of the Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects (April 2024) the Applicant has prepared a tracked changed version of the draft DCO and a schedule of changes to the draft DCO and submitted this at Deadline 1 of the Examination. The Applicant has reviewed the guidance entitled "Content of a Development Consent Order for Nationally Significant Infrastructure Projects" and considers the drafting of the DCO is in accordance with this guidance, noting that very similar advice was already provided for in Planning Inspectorate's Advice Note 15 on drafting Development Consent Orders (July 2018). The Applicant also notes that the Applicant is already engaging with relevant environmental bodies such as Natural England, Environment Agency and Historic England via service level agreements in line with the Planning Act 2008: Infrastructure Planning (Fees) Regulations 2010 - cost recovery by the Planning Inspectorate and public authorities (April 2024).

ExQ1	Respondent	Question	Applicant's Response
1.1	**Environmental Statement**		
Q1.1.1	The Applicant	ES5.4.3. Most topic chapters cross refer to Chapter 5 of the Environmental Statement (ES) when describing the rationale for determining the future baseline. In some cases the future baseline year is given and varies between topic chapters. In other cases no baseline year is specified. However, paragraph ES5.4.3 provides little information on the rationale used. Please expand on the rationale for determining the future baseline.	Chapter 5 EIA Assessment Methodology **[APP-057]** explains that the future baseline years mimic the assessment years for the Scheme. The future baseline presents the future conditions without the Scheme to ensure that the current baseline remains representative at the point of assessment, or where it is not, adequately explains the evolution of the baseline in the absence of the Scheme. Paragraph 5.6.8 **[APP-057]** states that the future baseline is 2025-2027, which aligns with the assessment of the construction phase. It then states that "a future baseline scenario in 2042 is also included for landscape, visual and heritage setting only, reflecting Year 15 (post construction), in accordance with industry good practice." This is to allow the assessment of impacts after planting has matured, as explained in Paragraph 5.6.10 **[APP-057]**. It goes on to explain that "Where relevant consideration will also be given to a future baseline approximately 40 years after commencement of operation (2067) to assess decommissioning impacts against." Paragraph 5.6.10 **[APP-057]** does acknowledge that "Other topics such as Socio-economics and Land Use (Chapter 12: Socio-Economics and Land Use, ES Volume 1 [EN010143/APP/6.1]) have presented data for alternative future years as per their assessment methodology". This chapter **[APP-064]** has considered a future baseline year of 2042 against which to assess operational impacts, which is expected to be 15 years post construction. This is to align with the landscape assessment (and industry guidance), which encourages the assessment to take account of the proposed landscape planting having matured. Generally, for most assessments the future baseline is expected to be broadly the same as or similar to the present-day baseline. i.e., the conditions on site are not expected to change noticeably. This is noted where applicable in each technical assessment.
Q1.1.2	The Applicant	ES5.6.1. Please expand on whether and how the assessment of construction phase works takes into account the 'permitted preliminary works' as defined in Art 2 of the draft Development Consent Order (dDCO) [AS-008].	The permitted preliminary works are captured within the definition of the construction stage in the EIA. Paragraph 5.6.1 of Chapter 5 EIA Assessment Methodology **[APP-057]** states that "construction phase effects are those effects that result from activities during enabling works, construction, and commissioning activities". Enabling works is not defined in the Environmental Statement but Chapter 2 Scheme Description **[APP-054]** explains site preparation works that would occur in advance of construction (and comprises these enabling works), which includes in Paragraph 2.6.2 installation of fencing, import of materials, plant and equipment to site, establishing the construction compounds and operation and maintenance hub, creating tracks and accesses, upgrading or constructing crossings over ditches, and marking out the location of infrastructure. Paragraph 2.6.8–2.6.19 goes on to describe the installation of fencing and security systems as part of site preparation. The ES did not specifically refer to environmental surveys and remedial work, or installing site notices and carrying out advance planting as part of the enabling / site preparation works, but environmental surveys and remedial work , including advance planting, is a commitment / outcome from the environmental assessments in the ES, and installing site notices is sufficiently minor that it did not warrant specific mention and is covered by the assessment of general enabling / site preparation works and construction works.
1.2	**The Scheme**		
Q1.2.1	The Applicant	With regard to the grid connection offer from national grid, please set out its terms, including any interactions with other	The Grid Connection Statement **[APP-236]** discusses the grid connection offer from National Grid.

ExQ1	Respondent	Question	Applicant's Response
		energy schemes affecting the Drax substation, its timing and capacity (EN1(24) paragraph 4.11.12 and EN-3(24) paragraphs 2.10.21 to 2.10.26).	The Applicant contracted with Eclipse Power Networks Limited (Eclipse) for the purposes of applying for the grid connection. Eclipse is licensed by Ofgem as an Independent Distribution Network Operator (IDNO). An IDNO designs, owns, operates and maintains electricity networks in the UK. IDNOs connect to the local distribution network, or to the transmission network, to serve new developments and are ultimately responsible for maintaining the local network. The Applicant and Eclipse submitted a joint application for the grid connection for the Scheme. They received a grid connection offer from National Grid Electricity System Operator Limited (NGESO) to connect the Scheme to the National Electricity Transmission System (NETS) at the National Grid Drax Substation in North Yorkshire in 2029. NGESO are the system operator for the NETS, and as such are the body of National Grid able to make connection offers. National Grid Electricity Transmission (NGET) operate as transmission owners, are the body of National Grid responsible for owning and operating the National Grid Drax Substation that the Scheme will connect to, should the DCO receive consent. The grid connection offer is a Bilateral Embedded Generation Agreement (BEGA)) to the Applicant and Eclipse which was originally received on 17 December 2021 and this was accepted by the Applicant and Eclipse on 12 April 2022. The BEGA is for the export of up to 400 MW via a 400kV/132kV supergrid transformer at National Grid's Drax 400kV substation and confirms that there is capacity for the Scheme to export electricity it generates via the transmission network. Engagement with NGESO has continued since 2021 and discussions are ongoing at the time of the submission of this Application regarding facilitating the connection for the Scheme including its timing. The NGET offer states a bay will be fitted out with a new Super Grid Transformer to enable this connection. which will convert the 132 kV electricity supplied by the Scheme to 400 kV to facilitate the efficient transmission of power onto NETS. All infrastructure within the National Grid Drax Substation would remain under National Grid's control. All works to the National Grid Drax Substation to accommodate the Scheme connection would be undertaken by National Grid The offer itself does not contain details of interactions with other energy schemes affecting the National Grid Drax Substation but the Applicant is aware of other energy schemes potentially connecting at this location in the future and will be seeking or have sought an agreement with NGET to achieve this.
Q1.2.2	The Applicant	ES Section 2.8 Decommissioning and EN-3(24) paragraph 2.10.69 Please confirm whether or not the driven piles or any other below ground foundations used to support the solar PV panels would be removed when the site is decommissioned.	PV panels will be mounted onto PV mounting structures – metal poles driven directly into the ground (ES Chapter 2: The Scheme **[APP-054]** Table 2-1). As stated in ES Chapter 2: The Scheme **[APP-054]** paragraph 2.8.4 all mounting poles supporting the PV panels will be removed from the Solar PV Site.
Q1.2.3	The Applicant	EN-3(24) advises that the output of solar farms is expected to change over time as the technology continues to evolve to become more efficient (paragraph 2.10.17) and the Statement of Need [APP232] indicates that it is reasonable to expect panel efficiency to increase linearly during the 2020s. Please comment on the potential for improved panel efficiency to make it commercially viable to replace all of the solar PV panels before the end of the scheme's anticipated 40 year lifespan.	At detailed design stage, the optimal panel will be selected. As stated at paragraph 2.8.2 of ES Chapter 2: The Scheme **[APP-054]** there will be no wholesale replacement of panels through the lifetime of the Scheme. In the scenario where all panels are replaced, this would need a full decommission and recommission of the solar arrays as panel sizes vary, with the mounting framework installed specifically for the chosen panel. Currently modules are warrantied for 30 years of linear output, so at year 30 they will still be generating 88.85% of their original output. Past the 30 year warranty expiration, the modules are expected to continue to degrade further in a linear

ExQ1	Respondent	Question	Applicant's Response
		Should this possibility form part of the assessment of the proposal?	fashion. Wholesale replacement of the PV panels for more efficient ones is therefore not considered commercially feasible and therefore did not form part of the assessment of the Scheme.
Q1.2.4	The Applicant	ES2.4 and Table 2.1. Please clarify the number of solar PV panels proposed and the relationship between panel output and the number and configuration of inverters, transformers and switchgear.	Solar PV Panel capacity, their total number and configuration of the supporting equipment (inverters, transformers switchgear) is subject to detailed design. The indicative design for the ES assumed a typical Field Station Unit (containerised inverter, transformer and switchgear) of 4 or 4.6 MW(AC) which are currently available on the market. Given that the Scheme's grid connection is 400MW(AC), up to 100 sets of such typical transformers, central inverters and switchgear will be required. These have been grouped into 45 Field Stations as described in Table 2-1 and as shown in Figure 2-3. If string inverters were utilised using current design and available inverters, there would be approximately 1334 individual inverters instead of the 100 central inverters. At detailed design stage, the optimal panel will be selected. PV panels currently available on the market differ in their capacity, and the number of panels required will be dictated by the capacity of the chosen panel at the detailed design stage. As stated in Table 2-1 (ES Chapter 2: The Scheme **[APP-054]**), each panel is expected to have a watt-peak capacity of between 400 and 1000 watts, depending on the technology available at the time of procurement. As an illustration, for a total installed capacity of 480MW dc (assumed for the ES Chapter 6: Climate Change **[APP-058]**, but noting that the inverters would only allow 400MW peak to be exported), and assuming panels are 650W capacity, there would be 738,462 individual PV panels required. As explained in paragraphs 2.4.3–2.4.72.4.5 (ES Chapter 2: The Scheme **[APP-054]**) it was necessary to build in some flexibility into the design of the Scheme for the DCO application submission, in order that the detailed design of the Scheme can be informed by environmental and technical considerations, post-consent investigative work, and take advantage of innovation in technology. The ES therefore assessed an 'envelope' within which the works will be delivered, adopting the principles set out in the Planning Inspectorate's Advice Note 9: Using the 'Rochdale Envelope' (Advice Note 9). As such, the Application and EIA has been based on maximum and, if relevant, minimum parameters. These parameters have been considered in detail by technical authors in the ES to ensure the realistic worst-case effects of the Scheme have been assessed for each potential receptor.
Q1.2.5	The Applicant	ES Figure 2-3 sheet 1 refers to a Grid Connection Substation Potential Development Area at Area 1c. 'Potential Development Area' is not mentioned in ES Chapter 2 The Scheme. Please clarify the meaning of 'Potential Development Area'.	The label referring to Grid Connection Substation at Solar PV Area 1c has been corrected. Updated ES Figure 2-3 (revision 1) has been submitted at Deadline 1.
1.3	**Parameters and mitigation**		
Q1.3.1	The Applicant	Table 2-1 of ES Chapter 2 states that the typical working area for installation of the Grid Connection cables would be a 30m wide corridor but that this may be widened in places to accommodate required operations and narrowed in others, for example to minimise removal of hedgerows or at open cut watercourse crossings. Please confirm what the maximum width of the corridor would be, where that is secured in the dDCO and	As stated within the Outline Design Principles Statement **[APP-235]**, all Grid Connection Cables are located on areas marked as Work No. 3 on the Works Plan **[APP-008]**. The Grid Connection Corridor shown as Work No. 3 on the Works Plan **[APP-008]** is an approximate 100 m wide corridor in which the Grid Connection Cables could be placed to allow spatial flexibility post-consent during final detailed design. Requirement 5 of the draft DCO **[AS-008]** secures this detailed design. The typical working area for installation of the Grid Connection Cables would be a 30 m wide corridor and may be wider or narrower than 30 m in places where it is necessary to avoid constraints and impacts, but will always remain within the area shown as Works No. 3 on the Works Plan **[APP-008].** This is secured by the draft DCO Article 3 (2) which states: "Each

ExQ1	Respondent	Question	Applicant's Response
		how that has been used to represent the worst case scenario for the assessments.	numbered work must be situated within the corresponding numbered area shown on the works plans." Baseline data for the ES has been collected for the entire extent of the Grid Connection Corridor represented by Work No. 3 shown on the Works Plan **[APP-008]**. The assessments within the ES have considered the full extent of the Grid Connection Corridor adopting the principles set out in the Planning Inspectorate's Advice Note 9: Using the 'Rochdale Envelope' (Advice Note 9). For example, in the ES Chapter 15: Soils and Agricultural Land **[APP-067]**, to present a worst case it was assumed that all agricultural land within the Grid Connection Corridor would be potentially subject to disturbance.
Q1.3.2	The Applicant	Horizontal Directional Drilling (HDD) is proposed at a depth of at least 5m beneath the riverbeds of the River Ouse and the River Derwent. A 16m buffer is proposed between the HDD send and receive pits from the landward flood defences beside the rivers, according to the framework Construction Environmental Management Plan (CEMP) [APP-238]. Please explain how this mitigation is secured for trenchless crossings under both the River Ouse and River Derwent.	The minimum HDD depth and buffers from flood defence infrastructure for both the River Ouse and River Derwent are set out within the Framework Construction Environmental Management Plan **[APP-238]** along with buffer distances of 30m from the top of river bank. The Framework CEMP has been updated and submitted at Deadline 1. Schedule 2 Requirement 11 of the draft DCO **[AS-008]** requires that a detailed CEMP is submitted and approved by the relevant planning authorities, and this will need to be substantially in accordance with the Framework Construction Environmental Management Plan. The HDD 5 m depth beneath the Rivers Ouse and Derwent is also secured in the Outline Design Principles Statement **[APP-235]** which is secured by Requirement 5(2) of Schedule 2 of the draft DCO.
Q1.3.3	The Applicant	The framework CEMP considers impacts from noise and vibration from construction works but navigational safety and silt mobilisation during the proposed HDD at the River Ouse and River Derwent do not appear to be considered. Please clarify how these matters have been assessed as part of the ES and identify any relevant mitigation measures that have been considered as part of this assessment.	Excessive noise may affect navigational safety by interfering with on-board communication. To put his into context, a normal conversation is possible between people at a distance of 2m apart at noise levels of up to 80dB. HDD activity would be at least 30m from the River Derwent and River Ouse so noise would be substantially lower than 80dB and would not affect on-board communication. This is therefore the reason this has not been considered in the noise and vibration assessment presented in the ES **[APP-063].**A commitment has been made to HDD to a depth of at least 5m below the river bed in the Outline Design Principles Statement **[APP-235]** as secured by Requirement 5(2) of Schedule 2 of the draft DCO and agreed with the Canal and River Trust as navigational authority. Given this distance it is therefore not expected that significant levels of vibration would be generated at the river bed. Consequently, vibration is unlikely to cause silt mobilisation and has therefore not been considered in the assessment presented in the ES. The Applicant can confirm that it has agreed protective provisions with the Canal and River Trust to protect navigational safety as included in the draft DCO at Deadline 1, and has submitted an agreed Statement of Common Ground also at Deadline 1.
Q1.3.4	The Applicant	The Water Management Plan is incorrectly defined as the Waste Management Plan in the CEMP Abbreviations list (page 132). Please correct this in the next iteration of the CEMP.	This has been corrected in the updated Framework CEMP which has been submitted at Deadline 1 of the Examination.
Q1.3.5	The Applicant	Subject to the necessary consents, the scheme is expected to be completed by 2027 (Statement of Need paragraph 7.6.4 among other references) and the scheme holds a grid connection offer date of 2029 (Statement of Need paragraph 7.6.3). Please explain the relationship between those dates and	Subject to the grant of the Development Consent Order, the Applicant would seek to bring the connection date forward with National Grid, if the Scheme can be completed prior to 2029. If this is not viable due to the National Grid upgrade works required, the Scheme will commence building 2 years prior to the connection date, to ensure that the connection is made on the due date. The

ExQ1	Respondent	Question	Applicant's Response
		what would happen to the completed scheme in the period before the grid connection becomes available.	programme would be arranged to minimise / avoid any period of time between the completion of construction and the connection date. The draft DCO **[AS-008]** allows construction to begin after the required pre-commencement requirements are approved and up to five years from the date the DCO comes into force. Although the EIA specifically mentions 2025-2027 for construction, where relevant, the technical assessment considers the effect should this be delayed or be protracted for any reason (it is not expected feasible to begin earlier than 2025) and have the potential to create different effects. It is not expected that a later construction period (say 2027-2029) or longer construction period would cause new or different effects to those already outlined in the ES. The latter is more critical to the assessment of impacts and is considered in the technical assessments; for example Chapter 8 Ecology **[APP-060]** (paragraph 8.4.2) states "Should the construction programme be extended this will not change the results of the EcIA [Ecological Impact Assessment] with respect to flora, as the impact is not affected by the duration of activity but rather the change or loss of any habitats. The impact on fauna is likely to be similar if the construction period is extended, with respect to any habitat loss. The assessment is also considered to represent a worst case in terms of impacts to species. For example, although it is acknowledged that a longer construction period could result in prolonged disturbance, this is unlikely to occur for the majority of the Site due to the sequential nature of the construction programme."
Q1.3.6	The Applicant	ES2.6.3 refers to construction works being carried out in a sequential manner and appears to imply that the solar PV panels nearest to the grid connection substation would be completed first. The construction period is expected to last some two years and the site covers a wide area. Therefore, the construction activity could be expected to affect the communities within the site to different degrees depending on its proximity. Please provide further clarity on the spatial sequencing and timing of the works over the site as a whole.	The Applicant agrees that construction activities could be expected to affect the communities within the site to different degrees depending on its proximity and the worst case scenario has been assessed and presented in the ES however the spatial sequencing and timing of the construction works cannot be fully defined until a full electrical design has been developed and EPC (Engineering Procurement and Construction) Contractors engaged. This would occur post consent as part of detailed design and would be provided in the detailed CEMP secured by requirement 11 of the draft DCO **[AS-008]**. As described in ES Chapter 2: The Scheme **[APP-054]**, the construction of a solar farm uses relatively few components. It would be normal for construction of large solar farms to result in the: • Installation of the Grid Connection Cables (Work No,3 on the Works Plan **[APP-008]** and onsite substations [Work No.2 on the Works Plan **[APP-008]** as separate works. • Installation of the fencing around the Solar PV Area and internal roads within the Solar PV Area. • Installation of the framework for the solar PV panels within the Solar PV Area. • Installation of the PV modules, around this time the electricians would start installing internal cabling and the field stations/cable installations. • Final electrical connections and testing All of these installations would have separate teams who would work in rotation: for example the fencers would install first then move on to the next Solar PV Area, followed by the framers, then the module installers and then electricians. As agreed with Natural England the habitats for the golden plover and the pink-footed goose within the Ecology Mitigation Area would be established prior to the commencement of construction works in the Solar PV Site. Construction works in the closest parts of the Solar PV Site (e.g., Solar PV Area 1b and 1e) will be undertaken first, to minimise any potential for disturbance in the Ecology

ExQ1	Respondent	Question	Applicant's Response
			Mitigation Area. The Framework LEMP **[APP-246]** has been updated with these commitments and has been submitted at Deadline 1. Requirement 4 of the draft DCO **[AS-008]** secures a community liaison group to be set up to facilitate liaison between representatives of people living in the vicinity of the Order limits and other relevant organisations in relation to the construction of the Scheme. The preparation and implementation of communications plans during construction are also included for in the detailed CEMP and detailed CTMP. The Applicant therefore considers that there are mechanisms to communicate the spatial sequencing and timings of construction activities for the local community to understand how this will impact them across the construction period.
Q1.3.7	The Applicant	ES2.6.10. Please clarify who would be responsible for the maintenance of the area between the perimeter fence and the field edge (min 5m wide).	The Applicant will be responsible for maintaining the area between the field edge and the fencing.
Q1.3.8	The Applicant	ES2.6.48 and CEMP2.3.5 refer to 'quiet non-intrusive works such as…' Please define this phrase more clearly.	Quiet non-intrusive works are works that do not give rise to elevated levels of noise. These comprise a variety of activities that do not require the use of loud power tools or machinery, including (but not limited to) administrative tasks, toolbox talks with construction staff, installation of PV panels, electrical testing, commissioning and site inspection. Clarification has been added into the Framework CEMP which has been submitted at Deadline 1 of the Examination.
Q1.3.9	The Applicant	The Design and Access Statement [APP-234] paragraph 5.2.12(b) refers to the use of buffer zones between the solar PV panels and residential properties. However, unlike the field stations and grid connection substations (paragraph 5.2.12(c)), no buffer distance is specified. Moreover, the Outline Design Principles Statement [APP-235] does not refer to a buffer between the solar PV panels and residential properties. This is the document to be used to control detailed design matters under Requirement 5 of the dDCO. Please give further consideration to the specification of a buffer for this purpose in the Outline Design Principles Statement, including an appropriate buffer width	One of the Scheme's design objectives (design objective 4 – see Design and Access Statement **[APP-234]**) is to ensure the Scheme design responds sensitively to residential properties in proximity to the Scheme regarding visual impact, noise, and lighting. This design approach is in accordance with paragraph 5.10.21 of NPS EN-1. With regard to the design response in relation to noise, the field stations and grid connection substations contain noise-emitting equipment. A buffer between this equipment and residential properties is a specific noise mitigation measure and therefore is secured in the Outline Design Principles Statement **[APP-235]** via requirement 6 in Schedule 2 to the Draft Development Consent Order **[AS-008]**. Solar PV panels, however, are not associated with elevated levels of noise and therefore do not require a minimum distance to residential properties with respect to noise. With regards to visual impact, the Applicant has designed location-specific buffers to mitigate for visual effects associated with the solar PV panels upon residential properties. These vary depending on the local context and therefore identifying and securing a fixed distance between solar PV panels and residential properties is not considered appropriate. Paragraph 4.1.10 of the Framework Landscape and Ecological Management Plan (LEMP) **[APP-246]** discusses how the visual effects for residential receptors have been reduced by the introduction of buffers as part of the Scheme's design. This includes: • Solar PV Areas being set back from public highways by a minimum of 5 m; • Solar PV Panels within Solar PV Area 1b being set back from the road behind an area of scrub with trees and a wide margin (approximately 100 m width) of species-rich grassland, which screens views for road users and retains longer views on the approach to Gribthorpe whilst also providing habitat for skylarks; • Solar PV panels within the south-western part of Solar PV Area 1a being set back from properties behind an area of species-rich grassland and hedgerow with trees (approximately

ExQ1	Respondent	Question	Applicant's Response
			100 m long) which screens views from the properties at Crossroad Cottages at the junction with Willitoft Road and Wood Lane; and • Solar PV Panels within Solar PV Area 2e set back from properties at the south of Spaldington by a wide margin of species-rich grassland, orchard tree planting and linear woodland planting (approximately 150 m) which screens views from the properties. The Landscape Masterplan at Appendix A of the Framework Landscape and Ecological Management Plan (LEMP) **[APP-246]** illustrates the likely buffers from residential properties and settlements based on the current design for the solar infrastructure. A detailed LEMP will need to be approved post consent prior to construction by East Riding of Yorkshire Council and North Yorkshire Council (the relevant local authorities) and must be substantially in accordance with the Framework LEMP **[APP-246]**. This detailed LEMP will secure the design of the detailed landscape design which will provide location specific buffers for residential properties. The detailed LEMP is secured by requirement 6 in Schedule 2 to the Draft Development Consent Order **[AS-008]**.
Q1.3.10	The Applicant	Please respond to the points made by the Forestry Commission [RR-118] regarding (a) access to woodland; (b) how the scheme proposals for the management and enhancement of woodland would align with the Forestry Commission's objectives; and (c) whether the buffer between the solar PV panels and areas of woodland should be increased from 15m.	(a) In response to the Forestry Commission's relevant representation, the Framework LEMP has been updated to include a specific commitment to enabling access to existing adjacent woodland. The updated Framework LEMP has been submitted at Deadline 1 of the Examination. (b) Sections 5 and 6 of the Framework LEMP **[APP-246]** explain the management of existing vegetation and proposed planting as part of the Scheme, including long term management. The detailed LEMP, which will need to be approved post consent prior to construction by East Riding of Yorkshire Council and North Yorkshire Council (the relevant local authorities) and must be in accordance with Framework LEMP **[APP-246]**, will secure the management measures for existing woodland and access to adjacent existing woodland. The detailed LEMP is secured by requirement 6 in Schedule 2 to the Draft Development Consent Order **[AS-008]**. (c) The comment from the Forestry Commission RR regarding the 15m buffer relates to shading impact of woodland / trees on solar panels. The Applicant has considered shading as part of the design process. This is explained in section 4.6 of the Arboricultural Impact Assessment (AIA) **[APP-102]**. Trees groups and woodlands have been assigned specific buffers based on their actual RPAs where these have been surveyed in accordance with British Standard 5837:2012. The AIA states that the Tree Constraints Plan **[APP-103]** and the Tree Protection Plan **[APP-104]** illustrate that no solar PV panels will be subject to significant shading at the time of construction. The AIA **[APP-102]** states shading impacts are 'typically slight and are generally associated with mature trees which will not increase significantly in size'. It is generally the height of trees rather than the extent of overhanging branches that results in the greatest volume of shading and this is reflected in the guidance in British Standard 5837: 2012 section 5.2 Note 1. The Applicant therefore considers the buffer distances from trees and woodland to be appropriate with regard to shading.
1.4	**Need**		
Q1.4.1	The Applicant	EN-1(24) paragraphs 3.3.25 to 27 outline the benefits of electricity storage. The flexibility provided by co-located storage is recognised in the Statement of Need Section 5.11. Together they establish the benefits of co-location of electricity storage for the wider electricity network. It is recognised that the proposal	As stated in the Statement of Need **[APP-058]**, the Applicant recognises the benefits that co-location of battery storage can provide to the wider network. The Scheme has undergone several stages of design evolution which are described in the Design and Access Statement **[APP-234]** and ES Chapter 3 Alternatives and Design Evolution **[APP-055]**. From the beginning of the design process the Applicant had included a battery energy storage system (BESS) within the Solar PV

ExQ1	Respondent	Question	Applicant's Response
		does not include a grid import connection. Nevertheless, and having regard to your response to Q1.5.1 below, please comment on the implications of the omission of electricity storage from the application proposal for (a) the wider network and (b) the fulfilment of EN-1(24) objectives.	Site. This was for the Scheme's energy generation rather than for import storage of electricity from the wider network. These proposals were consulted on by the Applicant at its non statutory and statutory consultations as detailed in the Consultation Report **[APP-025]**. The wider network operates as a national network and the Scheme will supply electricity into this. With increasing intermittent energy supplies such as solar and wind there can be peaks and troughs in electricity generation, which can cause overload and burnout of the infrastructure or insufficient supply respectively. This is why storage is supported by NPS EN-1, as it complements energy projects and particularly this type of renewables very well. On a national scale. storage is needed to provide a stable grid with fewer and less intensive peaks and troughs. The location of the storage however is immaterial and does not need to be co-located with energy generation projects where its purpose is to store electricity imported from the NETS. Battery storage to support NETS is most efficient (with fewest system losses) when located immediately adjacent to National Grid's regional substations. Providing BESS on the Solar PV Site as AC coupled (single, large compound) would have introduced new effects due to the visual prominence of a large compound in this setting near the onsite substations in Solar PV Area 1c, without the benefit of substantial existing screening. DC coupled BESS onsite, which is where the battery containers are located across tens or hundreds of different locations across the Solar PV Site, would have required fire water tanks at each location together with attenuation areas to capture fire water, introducing effects that local residents fed back on at statutory consultation and sought the removal of this technology. Co-location is considered suitable for most solar projects, but its successful delivery depends on the import agreement (of which none was secured for the Scheme), distance from the regional substation, and whether it will introduce likely significant adverse effects. The Applicant took the decision following the statutory consultation feedback and further engineering considerations to remove the BESS proposed. It is considered that the Scheme accords with NPS EN-1 by having investigated the potential for co-locating storage onsite, not prohibiting other developers coming forward with their own storage projects in the vicinity of the Scheme, and taking into account the opinions of local residents and the suitability of the Solar PV Site and surrounds to accommodate a BESS onsite.
Q1.4.2	The Applicant	Statement of Need paragraph 7.6.14. (a) Please expand on why SAT is preferred for the scheme, including consideration of any risks associated with its limited use to date in the UK. (b) If a combination of SAT and FSF were used, please provide further information on any environmental effects and whether any alternative or additional controls would be required.	Single axis trackers (SAT) are generally the most efficient way of utilising PV modules' maximum potential and for producing the most efficient electrical output per hectare. This is not always the case for every site depending on local conditions such as field sizes, but for the Order limits the Applicant estimates it will produce around 3% more electricity over the year for the same footprint and therefore is the optimal arrangement for maximising the renewable potential of the Order limits. As well as generating more renewable electricity, SAT also uses fewer number of solar panels (relative to south facing fixed arrangement) to deliver the same power to the grid when used on suitable sites like the Order limits (i.e., large flat fields with minimal hedgerows allowing for the long runs required). SAT is a tried and tested solution in many countries and the solution has always been available in the UK but the higher Capital Expenditure costs has previously ruled out SAT in the UK when compared to the cheaper and less efficient alternative of fixed south facing arrangement. Most larger UK projects currently in NSIP application stage are now SAT because of recent reductions in CAPEX costs making it is more attractive to developers. The Applicant's parent company, Boom Power has previously designed sites in Australia utilising SAT and is comfortable with the high performance of this technology. More manufacturers are now

ExQ1	Respondent	Question	Applicant's Response
			providing tracker systems globally and the track-record for these systems in all conditions is well documented. There are not considered to be any environmental or social risks associated with this technology, and the potential impacts have been adequately assessed in the Environmental Statement. A combination of SAT and south facing fixed panels is not considered practical and is not being sought by the Applicant. There would be a knock-on effect on Operations & Maintenance (O&M) activities; having two different systems within the same project boundaries would likely increase the installation and O&M costs, deliveries from different suppliers, separate storage of separate systems, cleaning two different systems, two different maintenance regimes, and separate monitoring systems, all resulting in increased vehicle movements. Glint and Glare and Landscape & Visual would have to be assessed twice, possibly leading to a different screening scheme, based on the worst-case arrangement. The modules/panels for SAT and fixed arrangements would likely be different sizes meaning more spare panels would need to be stored on site for repairs, with more delivery vehicles and storage facilities required. The complexity of different suppliers/manufacturers, contracts, and warranties would increase the unattractiveness of mixing module arrangements within a site. The Applicant has therefore sought consent for the most efficient solution for the Scheme.
1.5	**Site selection and alternatives**		
Q1.5.1	The Applicant	EN-3(24) advises that 'Solar also has an important role in delivering the government's goals for greater energy independence' and seeks a five-fold increase in deployment (up to 70GW) by 2035 (paragraph 2.10.10). It also states that solar farm "applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of "Best and Most Versatile" agricultural land where possible' (paragraph 2.10.29). The WMS seeks to avoid the use of Best and Most Versatile agricultural land. EN-3(24) advises that solar farm projects 'will be expected to direct considerable effort towards minimising the landscape and visual impact of solar PV arrays'. Concerns relating to both of these considerations, together with the scale of the proposal and its effect on the well-being and health of the local community, feature prominently in the Relevant Representations (RRs). The Government's 'Guidance related to procedures for the compulsory acquisition of land' advises that the Secretary of State (SoS) needs 'to be satisfied that the land to be acquired is no more than is reasonably required for the purposes of the	The installed capacity of the solar PV panels is the total DC power of all the panels at full power. The capacity for the Scheme considered in the climate change assessment **[APP-058]** is 480 megawatts (MW) (total DC power) whereas the 400MW is the grid connection and is measured in AC power and is the total AC power of all the central Inverters combined. As discussed in section 6 of the Statement of Need **[APP-232]** overplanting is used to maximise the available grid connection capacity across the lifetime of the Scheme owing to the degradation effects (light induced and other weather impacts) on solar panels as they age. As part of the detailed design process the design and layout of the Solar PV Site will be a reflection of the available technology (and overplanting ratio chosen) arranged in accordance with the parameters assessed in the Environmental Impact Assessment and parameters secured through the Outline Design Principles Statement **[APP-235]**. The design uses single axis trackers (SAT) that have a north to south orientation and track the sunlight from east to west on a daily basis, this gives a design that uses straight lines which also allows the minimisation of the visual impact on a large scale. The proposed layout of the Solar PV Tables avoids shading and ensures the sunlight available in both summer and winter is maximised for electricity generation. This will allow the Scheme to consistently produce electricity to export to the National Electricity Transmission System (NETS) thereby aiming to deliver the 400MW AC output for as many hours as possible. The Applicant has based the design on a tracked mounting system and panel technology which have a record of delivering longevity and efficiency based on the Applicant's experience of using these systems in Australia. As discussed in ES Chapter 3: Alternatives and Design Evolution, the Applicant's selection of the Solar PV Site has considered irradiance and topography by initially identifying East Yorkshire and areas of the neighbouring North Yorkshire as a suitable area within the UK to locate a large-scale solar development due to its good levels of irradiation (see Figure 6-2 in the Statement of Need **[APP-232]**) and large areas of flat open land. As shown in ES Figures 10-9 to 10-55 **[APP-164 to APP-210]** the Solar PV Site is located on low lying land within a relatively flat landscape and is therefore optimal for a large-scale development of SAT. As discussed in the responses to Q1.0.2

ExQ1	Respondent	Question	Applicant's Response
		development' (paragraph 11). EN-3(24) advises that 'Along with associated infrastructure, a solar farm requires between 2 to 4 acres for each MW of output' (paragraph 2.10.17). The application Order Limits extend to some 1276 hectares (ha) and the Solar PV area to 966ha (or 2387 acres) (ES2.2.3). Even taking the solar PV area alone, this indicates and output of some 600 to 1200 MW. The Statement of Need is silent on the capacity of the scheme, although the Planning Statement [APP-233] states that it would have an installed capacity of approximately 400MW (paragraph 5.3.2) and ES6.4.1 assumes capacity of 480MW. Both of these figures are significantly less than the output suggested by EN-3 given the size of the site. Please provide clarification of the output and efficiency (expressed in capacity and annual energy generation) of the proposed development having regard to: a) The policy considerations set out above b) The size of the site c) The appropriateness of the site location with regard to (i) site irradiance, orientation and typography and (ii) the use of agricultural land d) The site layout e) The preferred tracked mounting system and the choice of solar PV panels f) The capacity of the proposed grid connection negotiated with National Grid and the appropriate allowance for over-planting	and Q1.5.3 the majority of the Solar PV Site is low to medium grade agricultural land and the use of brownfield land and non agricultural land was considered as part of the process of selecting the Solar PV Site. With regard to the reference to acreage per MW in NPS EN-3 paragraph 2.10.17, the Applicant notes that this paragraph does not set out any detailed technological assumptions or method for how this has been derived. Taking the total acreage of the Solar PV Areas within the Solar PV Site and excluding the buffer zones within these areas for fencing, public rights of ways, access, overhead lines and landscape and ecological mitigation and enhancement zones of1836 acres and the total DC power of 480MW, this equates to approximately 3.83 acres per MW power output, which is within the range presented in paragraph 2.10.17 of NPS EN-3.
Q1.5.2	The Applicant	ES Table 3-1 page 3-8. In response to a question about clustering the solar PV areas closer together, the Applicant's response refers to land availability. However, this consideration is covered only briefly in the Design and Access Statement [APP-234] and, in any event, it is proposed to use Compulsory Acquisition powers. Please expand on the rationale for the selection of the relatively dispersed pattern of the solar PV areas proposed compared with a more concentrated layout, with particular regard to the relative impacts on residential properties and landscape character.	The Applicant has set out its rationale for selecting the Solar PV Site in Chapter 3: Alternatives and Design Evolution within the Environmental Statement **[APP-055].** This explains the stages and the main considerations which have influenced the Applicant in how it has selected the land for the Scheme. For the Solar PV Site this has included seeking to avoid environmental and land use constraints and taking into consideration other criteria such as topography; field pattern and arrangement; land use conflict, as well as land availability. The land availability criterion assisted the Applicant with identifying landowners willing for their land to be used for the Scheme; identifying landholdings with minimal landownership to minimise the number of landowners affected by the Scheme; and avoiding unregistered land due to uncertainty of ownership. Although there is the ability to apply for and use compulsory purchase powers as part of the DCO process, considering land availability is typical for selecting land for development because securing land through agreement and affecting fewer land interests can reduce impacts on development delivery in terms of programme and cost. This resulted in the Applicant identifying some contiguous Solar PV Areas and some discrete Solar PV Areas. As discussed in Chapter 3 **[APP-055]** all are in close proximity to one another and provide appropriate offsetting from residential properties that avoid enclosing residential receptors on more than two sides. Impacts on landscape character of the Scheme are presented in ES Chapter 10 Landscape and Visual Amenity **[AS-014]**

ExQ1	Respondent	Question	Applicant's Response
			and concludes that significant adverse effects are predicted for Local Landscape Character Areas (LLCA) Howden to Bubwith 5a and West of Holme on Spalding Moor Farmland 5b at Year 1 of operation with these significant adverse effects remaining for LLCA 5a at Year 15 of operation due to the prominent change to key characteristics within this LCA. These conclusions would also be the same if the Solar PV Site was a more concentrated layout.
Q1.5.3	The Applicant	ES3.5.13 concerns the Applicant's Stage 3 site selection process within a refined site area. It refers to Section 3.10 of the then draft EN-3 with regard to the preference for the use of brownfield and nonagriculture land. This preference is maintained in EN-3(24) (paragraph 2.10.29) and the WMS. Given this policy context, please expand on how the preference for use of brownfield and nonagricultural land was taken into account in earlier stages of the site selection process when, potentially, there may have been more opportunities to meet these preferences.	The Applicant has set out its rationale for selecting the Solar PV Site in Chapter 3: Alternatives and Design Evolution within the Environmental Statement **[APP-055]**. This explains the stages and the main considerations which have influenced the Applicant in how it has selected the land for the Scheme. For the Solar PV Site this has included seeking to avoid environmental and land use constraints and taking into consideration other criteria such as topography; field pattern and arrangement; land use conflict, as well as land availability. In accordance with NPS EN-1 paragraph 5.11.3, NPS EN-3 paragraph 2.10.29 and the WMS, the Applicant considered the use of previously developed land and non agricultural land and did not identify any available land of this type within its initial area of search or within the refined area of search of an appropriate size to locate the Solar PV Site for the Scheme. ES Figure 3-2 **[APP-141]** illustrates the provisional agricultural land use mapping within the refined area of search and shows there is no non agricultural land within this area. Furthermore, as discussed in ES Chapter 3: Alternatives and Design Evolution **[APP-055]**, the Applicant's review of the local planning authority brownfield register and local knowledge at the time did not identify any brownfield sites which were of a suitable size and location for the Scheme. The Scheme will utilise the developed land at Johnson's Farm for its operations and maintenance hub. In accordance with NPS EN-1 paragraph 5.11.12 and NPS EN-3 paragraph 2.10.29 the Applicant has taken a sequential approach to the use of agricultural land considering whether land of lower grade is available and suitable. Following the identification of an initial area of search derived from the point of connection at the National Grid Drax Substation, and the identification of a refined area of search through the avoidance of environmental and land use constraints including large areas of best and most versatile (BMV) land and taking into consideration other criteria which would identify suitable land for solar development as described above, the Applicant identified low and medium grade agricultural land for the majority of the Solar PV Site and did not identify any alternative land which would be of lower grade agricultural land that was available or considered suitable for the Scheme to meet its objectives. Through this process the amount of higher grade (BMV) land used for the Solar PV Site has been minimised with only 7.1% of the Solar PV Site being of BMV quality.
Q1.5.4	The Applicant	ES3.5.14 implies a somewhat opportunistic selection of the location for ecological mitigation sites based on the offer of land for that purpose. Please expand on the site selection process for the ecological mitigation areas.	Section 8.4 of the Habitats Regulations Assessment **[APP-244]** sets out the criteria considered for the selection of appropriate and effective mitigation land for the loss of functionally linked habitat for the Lower Derwent Valley SPA/Ramsar and Humber Estuary SPA/Ramsar sites. These criteria include sufficient size (derived from the peak counts of birds recorded during field surveys), openness to facilitate long-distance views for birds, and location away from sources of disturbance. When it was determined mitigation land would be required, the Applicant's ornithologist reviewed the land in close proximity to the Solar PV Areas (where functionally linked habitat had been identified through ecological survey) against these criteria. The proposed Ecology Mitigation Area was selected following this review as it performed well against the criteria. The availability of land was a secondary consideration but nevertheless an important and relevant factor in accordance with good site selection practice.

ExQ1	Respondent	Question	Applicant's Response
2.	**Biodiversity (including Habitats Regulations Assessment (HRA))**		
Q2.0.1	The Applicant	ES Table 8-1 page 8-8. Please provide an update on progress towards obtaining an Impact Assessment and Conservation Payment Certificate for great crested newts.	Natural England have issued An Impact Assessment and Conservation Payment Certificate for great crested newts. This has been provided as an update to the ES Appendix 8-10: Great Crested Newt District Level Licensing Impact Assessment and Conservation Payment Certificate **[APP-094]** at Deadline 1 of the Examination.
Q2.0.2	The Applicant, Natural England (NE) and local planning authorities (LPAs)	ES Table 8-1 page 8-25/26. Has there been any on-going consultation with NE and the LPAs to align habitat enhancement proposals with any Local Nature Recovery Strategies (see EN-1(24) paragraph 4.6.14)? If so, please provide further details.	It is understood that East Riding of Yorkshire Council is currently developing a plan for preparing their Local Nature Recovery Strategy, including how they will engage with stakeholders throughout the process. The aim is for the strategy to be complete by early 2025. Positive meetings have been held with both Natural England and East Riding of Yorkshire, with local officers supportive of the ecological benefits delivered by the Scheme; however, the Local Nature Recovery Strategy specifically has not been discussed with these parties to date.
Q2.0.4	The Applicant and LPAs	ES8.3.17. Please provide an update on works and mitigation measures within the Wressle Verge and Tottering Lane, Gribthorpe Local Wildlife Sites	The Applicant is currently in correspondence with East Riding of Yorkshire Council and is seeking to finalise required management of the visibility splays, and any passing place strategies that look to be required on Wood Lane (in addition to Rowlandhall Lane and Ings Lane), part of which is designated as Wressle Verge LWS. Any required passing place strategy will aim to minimise any environmental impacts through careful site selection, with additional impacts (to those resulting from works to facilitate access) to verge habitats avoided where practicable.
Q2.0.7	The Applicant, NE and LPAs	ES8.4.2 appears to discount the effect on fauna of a longer construction period based on the likelihood of it occurring, rather than what the effect may be. (a) Applicant Please clarify your approach. (b) NE and LPAs Please comment on the Applicant's approach to this matter.	The assessment presented in the ES Chapter 8: Ecology **[APP-060]** represents a worst case in terms of impacts to species, based on the estimated 24 month construction period. It is acknowledged that the impact on fauna is likely to be similar if the construction period is extended, with respect to any habitat loss. It is also acknowledged that a longer construction period could result in prolonged disturbance. Prolonged disturbance is however considered unlikely to occur across the majority of the Site due to the sequential nature of the construction programme.
Q2.0.9	The Applicant	ES8.4.7. The dust assessment is presented in ES Chapter 16: Other Environmental Topics, rather than in the ecology chapter. ES16.2.78 refers to the potential for overlaps of construction traffic effects with other schemes. Please provide an update on the schemes which could potentially interact with the Application proposal. How would this be managed in the event of schemes being constructed concurrently?	ES Chapter 16: Other Environmental Topics **[AS-016]** Table 16-2 outlines the schemes of potential interest to this application. The known concurrent schemes including Drax Carbon Capture with Storage DCO, Eastern Green Link 2 (EGL2) and the Drax Re-power DCO are mostly too far apart (more than 500m from respective Site access points) for the potential in-combination effects of trackout. Where construction would occur concurrently with the other schemes additional inspection of road conditions for trackout would be undertaken and the frequency of cleaning increased if required. The dust associated with construction traffic in the event of concurrent schemes will be managed through mitigation/enhancement measures set out in the Framework Construction Environmental Management Plan **[APP-238]** which includes the requirement for the development and implementation of a Dust Management Plan (DMP).
Q2.0.10	The Applicant and NE	ES8.4.10. Please comment on the suitability of the existing and Phase 1 habitat and condition assessment data used in the Biodiversity Metric 3.1 Habitat Condition Assessment for use in the Biodiversity Metric 4.0 assessment?	All baseline habitats defined within the Site were assigned a condition using the condition assessment criteria outlined in the Biodiversity Metric 4.0 guidance documents, by a suitably qualified ecologist using data collected during the field surveys. The variation in condition criteria for the habitats presence on Site is predicted to have a negligible impact on the BNG assessment results. Further justifications of habitat condition scores are provided in Appendix D of the BNG

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			Report **[APP-243].** The data was aggregated and entered into the Biodiversity Metric 4.0 to calculate the baseline biodiversity units.
Q2.0.11	The Applicant	ES8.4.44 to 47. Given that terrestrial invertebrate and reptile field surveys or species-specific surveys for hedgehog, brown hare, polecat and common amphibians have not been undertaken, how can the ExA be confident that the mitigation proposed for these species would be adequate?	The potential presence of hedgehog, reptiles and common amphibians has been assumed across the Site, where suitable habitat is present. However, the majority of the Site is arable and of limited suitability for these species. Although specific surveys for brown hare were not undertaken, sightings of this species were recorded during other ecological field surveys. The potential presence of polecat is acknowledged but considered unlikely, due to the reasons set out in Table 8-9 of the ES Chapter 8: Ecology **[APP-060]**. The habitats recorded within the Site are common in a local and national context and therefore unusual or rare assemblages of terrestrial invertebrates are not expected to be present. The mitigation proposed is precautionary and assumes that all of the aforementioned species could be present, where suitable habitat exists within the Site, and is based on standard RAMs provisions to avoid harm to these species during construction. Table 3 of the Framework CEMP **[APP-238]** includes the following commitment: Precautionary methods of working will be adopted for vegetation clearance within areas where reptiles, notable mammals (e.g. hedgehog, polecat, brown hare, harvest mouse) or amphibians could be present, to minimise the risk of injury/killing. The measures contained within the Framework CEMP are secured by Requirement 11 in Schedule 2 of the draft DCO **[AS-008].** The habitats that will be created as part of the Scheme will also be beneficial to these species, increasing the areas of available habitat for them, and improving the connectivity in the area.
Q2.0.12	The Applicant, NE and LPAs	The effect of the proposal on the local deer population has been raised in a number of RRs. Please comment on concerns about impacts arising from changes to deer movements in the area as a result of the Proposed Development, particularly arising from the perimeter fencing around the solar PV panel areas (see also EN-1(24) paragraph 5.4.22).	The space between the fence and the field edges provides space for deer to move within and around the edges of the Site, outwith the Solar PV fields. Although deer will not be able to enter the Solar PV Areas once the Scheme is operational, their ability to move through the landscape will not be affected by the Scheme and there is other suitable habitat in the local area.
Q2.0.13	The Applicant	ES8.4.74. How do you anticipate achieving 10% biodiversity net gain (BNG) for hedgerows at the detailed design stage? How would this be secured in the DCO?	+10% BNG in hedgerows will be achieved using enhancement to currently retained hedgerows and new proposed hedgerows. The updated BNG Report submitted at Deadline 1 demonstrates that +10% BNG in hedgerow habitats can be achieved on site. Requirement 7 Schedule 2 of the draft DCO [AS-008] requires a biodiversity net gain strategy to be approved post consent and this must be substantially in accordance with the Framework LEMP **[APP-246]** which at section 2 explains the Applicant's commitment to at least 10% BNG.
Q2.0.15	The Applicant	ES Table 8.12 page 8-269-270. What evidence is there that the relatively narrow retained margins around the solar PV panels would be equally attractive to bird species such as curlew and skylark as the currently unincumbered arable fields?	As set out in Table 8.12 of the ES Chapter 8: Ecology **[APP-060]** the Scheme is not relying solely on the retained margins around panelled areas for ground-nesting bird species, such as Skylark and Curlew, although it has been demonstrated, e.g., Montag et al. (2016)[1] that these provide good quality foraging habitat for Skylark and other farmland bird species. Both managed margins and grassland created within the panelled areas will support an increased abundance of invertebrate prey throughout the Order limits, which will benefit all farmland bird species. Equally, the cessation of disturbing practices associated with intensive arable farming, such as, ploughing, harvesting and spraying during the breeding season, will reduce nest loss and low productivity rates. As described in sections 8.6.6-8.67 of the ES Chapter 8: Ecology **[APP-060]**, larger areas offering uninterrupted

[1] Montag H, Parker G & Clarkson T. (2016). The effects of solar farms on local biodiversity. A comparative study. Clarkson and Woods & Wychwood.

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			sightlines, amounting to 38.76ha will be managed for ground-nesting birds, providing both optimal nesting and foraging conditions. These are described in more detail in the Framework LEMP **[APP-246]** and shown on the Landscape Masterplan (Appendix A of the Framework LEMP **[APP-246]**). In addition, the Goose Mitigation Zone and Golden Plover Mitigation Zone will also provide enhanced habitats suitable for both Skylark and Curlew.
Q2.0.15	The Applicant, NE and LPAs	ES Table 8.12 finds a considerable number of minor adverse effects which, considered individually, would not be significant as defined in the ES methodology. Please comment on the combined effect of this number of minor adverse effects.	Whilst the construction phase of the Scheme is predicted to result in several minor adverse effects to discrete ecological receptors with specific ecological requirements, the majority of these impacts will be temporary and short term in nature. Ultimately the Scheme will enhance existing habitats and create new areas of habitat which will benefit a range of species in the longer term.
Q2.0.16	The Applicant	ES8.7.24 suggests that the land used for the Grid Connection Corridor (GCC) cables and substations may be retained after the rest of the scheme is decommissioned, but then goes on to state that the land would be returned to the landowners in the same condition as prior to the development. These statements appear to be inconsistent - at least with regard to the substations. Please clarify the position.	Section 2.8 of the ES Chapter 2: The Scheme **[APP-054]** provides a more detailed description of the decommissioning process, and explains that the Grid Connection Substations and Grid Connection Cables may be retained beyond the design life of the Scheme. Paragraph 8.7.24 should have been worded more clearly to say that land will be returned to the landowners in the same condition (Agricultural Land Classification [ALC] grading) as prior to development except for the land associated with the Grid Connection Substations and Grid Connection Cables, should these be retained after the Scheme decommissioning.
Q2.0.17	The Applicant	ES Tables 8-15 and 8-16. A number of the identified cumulative schemes have yet to submit ecology assessments (eg within HRAs or ESs) and the cumulative effects assessment assumes that they would mitigate any significant effects. However, it is possible that such effects could not be mitigated but that decision-makers would find that the benefits of the scheme would outweigh the adverse effects and therefore grant consent. Please comment on this scenario.	Where cumulative schemes are yet to assess their impact, it is not possible to make a detailed assessment of cumulative effects. However, it is reasonable to expect that standard best practice mitigation measures to ameliorate effects will be incorporated into the applications and design for all schemes, and that they will ensure they do not have a significant cumulative effect. Given the legal and policy framework provided to protect ecological receptors that will be assessed and evaluated during planning it is reasonable to conclude that there will be no cumulative effects. Where decision-makers find that the benefits of a scheme outweigh adverse effects and grant permission, it would still be required for such a project to abide by standard mitigation and legislation requirements for all ecological receptors.
Q2.0.18	The Applicant	Please respond to the EA's concerns [RR-107] regarding (a) vegetation clearance and building works, (b) the need for an Invasive Non-native Species eradication plan, and (c) provisions to protect eels in the event that over pumping is required at larger drain crossings.	(a) As set out in the ES Chapter 8: Ecology **[APP-060]** and the Framework CEMP **[APP-238]** which will inform a detailed CEMP secured by Requirement 11 in Schedule 2 of the draft DCO **[AS-008],** vegetation clearance will be undertaken in advance of construction and at an appropriate time of year to avoid the nesting bird period. Where vegetation clearance cannot avoid the inactive season and is proposed within the nesting bird period, these will be checked for the presence of any nests by a suitably experienced ornithologist, prior to vegetation removal, and if active nests are found, then appropriate buffer zones would be put in place and the area monitored until the young birds have fledged. (b) Terrestrial and aquatic Invasive Non Native Species (INNS) have been identified within and in the vicinity of the Site through site survey and desk-based study. See the ES Chapter 8: Ecology **[APP-060]**, ES Appendix 8-2: Aquatic Ecology Report **[APP-083]** and ES Appendix 8-3: Extended Phase 1 Habitat Survey Report **[APP-084]**. The following mitigation measures are included in the Framework CEMP **[APP-238]**. A detailed CEMP (which must substantially accord with the Framework CEMP **[APP-238]**) will need to be approved post consent prior to construction with the relevant local authorities and this is secured by a requirement in Schedule 2 to the Draft Development Consent Order **[AS-008]**:

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			• Pre-construction surveys will be undertaken where required to provide an update on the presence and location of any INNS that could be impacted by the Scheme, the findings of which will inform the implementation of measures to prevent their spread. • A Biosecurity Plan will be produced prior to construction which will set out procedures to ensure that no invasive species are brought onto the Site, exported out of the Site or spread within it (e.g. Wildlife and Countryside Act 1981 (as amended) Schedule 9 species. In the event that any future infestations of INNS are identified prior to and or during the development process, exclusion zones will be established around them, and a suitably qualified ecologist contacted for advice as required. Site / species specific method statements (or similar will be prepared as required) (c) The Applicant accepts that if over pumping is required for the crossing of larger drains, a 2 mm diameter mesh screen on the intake to comply with the Eel Regulations is required. This has been added to the mitigation and enhancement measures in Table 3 within the updated Framework CEMP, which will be submitted at Deadline 1 of the Examination. A detailed CEMP (which must substantially accord with the Framework CEMP **[APP-238])** will need to be approved post consent prior to construction with the relevant local authorities and this is secured by a requirement in Schedule 2 to the Draft Development Consent Order **[AS-008].**
Q2.0.19	The Applicant	EN-1(24) paragraph 4.6.15 advises that applications should be accompanied by a statement demonstrating how opportunities for delivering wider (than BNG) environmental net gains have been considered and incorporated into proposals. Please clarify how the proposal meets this requirement.	When designing the landscape and ecological mitigation areas, including but not limited to those for BNG, consideration was given to what habitats and design would be most appropriate and beneficial to the location of the project and the wider area. This included providing appropriate connectivity within the Scheme and to areas and habitats surrounding the scheme. The Ecological Mitigation Area, for example, was chosen in part for its location and habitat connectivity linkages to wider environmental corridors including the River Foulness. 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. 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. Land adjacent to the River Foulness has been identified as one of the most sensitive features within the Solar PV 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 (see Figure 2-3 **[APP-138]**). The habitat type will therefore extend along the eastern extents of the Solar PV Site along the flood zone. 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 **[APP-243]**, Natural England's Biodiversity Metric 4.0, has been produced for the DCO Application. This report

ExQ1	Respondent	Question	Applicant's Response
			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 Planning Statement **[APP-233]** Section 5 explains that the Scheme will deliver a substantial reduction in greenhouse gas emissions over its lifetime, as explained by Chapter 6: Climate Change, ES Volume 1 **[APP-058]**. 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. The Scheme's climate adaptation measures are set out in the relevant ES Chapters, **[APP-058 to APP-068]**. Landscape enhancement measures are set out in the Framework LEMP **[APP-246]**. 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) 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.
Q2.0.20	The Applicant	EN-1(24) paragraph 5.4.44 advises that habitat creation or enhancement delivered, including biodiversity net gain, should generally be maintained for a minimum period of 30 years, or for the lifetime of the project, if longer. Section 6 of the Landscape and Ecological Management Plan (LEMP) [APP-246] sets out the establishment maintenance (5 years) and long-term management (project lifetime) regimes for new planting. While the establishment maintenance includes provision to replace failed or defective plants, there is no such provision in the longer term. Having regard to the aims of EN-1(24) paragraph 5.4.44, should the LEMP include provisions to replace failed or defective planting throughout the project lifetime?	The Framework LEMP **[APP-246]** Section 6 outlines how the habitats will be managed throughout the Scheme operation. The Framework LEMP has been further updated to include relevant provisions with regards to failed or defective planting for beyond year 5, and has been submitted at Deadline 1.
2.1	**Habitats Regulations Assessment**		
Q2.1.1	The Applicant	Paragraph 1.1.4 of the Habitats Regulations Assessment Report (HRAR) [APP-244] explains that the scope and extent of the HRA was determined by ongoing engagement with NE, among other factors. Footnote 2 on page 12 states that NE were consulted on the draft HRAR on 28 September 2023 and a Discretionary Advice Service response was received on 20 October 2023. There are references throughout the HRAR in respect of consultation responses from or agreement with NE. However, neither the HRAR nor any other application document include evidence of NE's position in respect of the HRA. Please can the Applicant provide the supporting evidence of consultation and any agreement with NE.	This comment is noted. Through ongoing engagement, the Applicant has developed a Statement of Common Ground (SoCG) with Natural England, which identifies the mutually agreed approach to key HRA-related issues (such as functionally linked habitat loss). It also provides detail on all meetings held and email communications exchanged with Natural England. The SoCG forms part of the suite of documents submitted at Deadline 1.

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Q2.1.2	The Applicant	The Conservation Objectives and 'threats and pressures' for each European site are shown in Table 5 (Section 4, page 23). However, the current conservation status of the European sites is not identified. Please provide this information for each European site considered in the Habitats Regulations Assessment (HRA).	Natural England do not formally publish data on the current conservation status of individual European sites, hence it was not included in the submitted HRA. However, they do provide such information for the SSSIs underpinning SPAs and SACs. Information on the summary condition of SSSIs (as % of SSSIs in Favourable, Unfavourable – Recovering, Unfavourable – No Change and Unfavourable – Declining) has been included in Table 5 of the HRA, which will be submitted at Deadline 2.
Q2.1.3	The Applicant	A number of potential impact pathways are identified for effects on qualifying species of the Humber Estuary Special Area of Conservation (SAC) in the HRA Report (HRAR) Section 4 Table 6. However, only the water quantity, level and flow impact pathway is identified as relevant to the SAC in HRAR Section 5. Section 6 considers the SAC during construction in relation to noise and visual disturbance, water quality, and water quantity level and flow; and water quality and water quantity level and flow during operation. Loss of functionally linked habitat, atmospheric pollution and introduction of invasive non-native species (INNS) are not addressed. The SAC screening matrix omits atmospheric pollution and INNS. Please confirm which impact pathways apply to the Humber Estuary SAC, to which features and to which phase(s) of the Proposed Development. The HRAR main text and the screening and integrity matrices should be updated accordingly, including the incorporation of any omitted assessments.	Section 5 of the HRA has been updated to correctly show noise and visual disturbance, water quality, water quantity, level and flow, atmospheric pollution and the introduction of INNS as relevant to the Humber Estuary SAC. However, no specific changes regarding these impact pathways have been made to Section 6 HRA Stage 1: Screening for Likely Significant Effects. LSEs of the Scheme regarding the introduction of INNS to all European sites (which would include the Humber Estuary SAC) are excluded on the basis of legislative drivers (see paragraphs 6.2.35 and 6.2.35 of the HRA submitted with the DCO application **[APP-244]**). Loss of functionally linked habitat has been deleted from Section 4 Table 6 for the Humber Estuary SAC, as this is not an impact pathway that will arise from the Scheme in relation to this site (since no functionally-linked habitat for the SAC features will be lost). Section 6 has been updated with the screening assessment for the Humber Estuary SAC. The screening matrix for the Humber Estuary SAC has been updated with assessment text on atmospheric pollution and the introduction of INNS for submission at Deadline 2.
Q2.1.4	The Applicant	An in-combination effects (ICE) screening assessment is contained in HRAR Section 7, Table 10. Where it is determined that ICE may occur it generally does not identify which European sites and qualifying features may be affected or the phases of the Proposed Development in which the ICE could occur. In addition, not all of the adverse effects on integrity (AEoI) assessments contained in HRAR Section 8 that identify the potential for ICE identify the European sites and features that may be affected. Please provide this information. 'Cumulative' and 'in-combination' are used interchangeably in the HRAR; references in relation to HRA should be to in-combination effects.	Table 10 of the HRA has been updated for Deadline 2 with the phases of the Scheme in which relevant impacts will arise, as well as the European sites potentially impacted. Where this information is missing, the in-combination AEoI assessments have also been updated to clearly state the European sites / qualifying features potentially impacted. All references to cumulative impacts in the in-combination assessments have been replaced by referring to in-combination effects, except for where these refer to a specific table caption. These amendments will not change the fundamentals of the assessment.
Q2.1.5	The Applicant	In relation to potential noise and visual disturbance effects on otter (a qualifying feature of the Lower Derwent Valley SAC and the River Derwent SAC), HRAR Section 8.1 explains that the majority of the construction and decommissioning works would be undertaken during daylight hours, apart from occasional works early morning/late evening and potentially some night-time Horizontal Directional Drilling (HDD) in wintertime. The likely frequency of the nocturnal works is not quantified further,	HDD operations will be temporary, with drilling operations typically requirng several days per crossing. The likely duration of potential nocturnal works (e.g. HDD crossings) has been specifically referred to in an updated HRA which will be submitted at Deadline 2. Furthermore, reference to other relevant application documents (e.g. the Framework CEMP **[APP-238]**) has been included. However, the likely frequency of other nocturnal works and any associated lighting requirements are not confirmed at this stage. Section 2.3 of the Framework CEMP **[APP-238]** defines the core working hours which generally occur during the day but notes that night-time work may be required

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		nor is cross-reference made to relevant information contained in other application documents. Please provide this information or identify its location within other documents.	due to an emergency or during HDD where the activity needs to be completed as soon as practicable to limit services disruption.
Q2.1.6	The Applicant	Although, in addition to river and sea lamprey, the bullhead feature of the River Derwent SAC is mentioned in HRAR Section 6.2, disturbance likely significant effects (LSE) are considered only in respect of lamprey. Please provide an LSE assessment in respect of disturbance for bullhead	Further text has been added to the HRA for submission at Deadline 2 including a specific discussion of bullhead. The existing assessment of the low acoustical energies associated with HDD remains valid as a basis for concluding no LSEs in relation to noise disturbance of qualifying fish, including bullhead which are considered to have similar levels of sensitivity as lamprey.
Q2.1.7	The Applicant	In respect of the River Derwent SAC and potential disturbance impacts on river and sea lamprey (HRAR Section 6.2), please provide details of the timings and duration of any potentially disturbing works and relate those to the core migratory periods for those species.	Details on the duration of disturbing works will be provided in the Deadline 2 HRA (HDD is typically completed within a day). The exact timings of HDD works are not currently known but the HRA has been updated to specify that the core migratory period of lamprey between September and February and May will be avoided, where practicable. This seasonal restriction has been included in the updated Framework CEMP submitted at Deadline 1.
Q2.1.8	The Applicant	In relation to the temporary removal of verge habitat within the River Derwent SAC for a construction access track, please explain how and where restoration of the habitat is secured within the application documents.	Details of how the verge habitat will be restored are now included within the update to Framework LEMP submitted at Deadline 1.
Q2.1.9	The Applicant	Operational water quality LSE (from surface runoff resulting in water pollution) are identified in the screening assessment (HRAR Section 6.3) for all of the European sites except the Lower Derwent Valley SAC (although the SAC is included in the AEoI assessment for this impact pathway in Section 8.2). Although a reference is made to the need for surface runoff to be managed in the operational phase no assessment or description of proposed operational mitigation is provided and the conclusion therein (para 8.2.13) refers only to construction and decommissioning. Section 9.1 and the title of Section 9.3 list operational water quality effects, however they are not addressed there either and the conclusion in paragraph 9.3.2 omits reference to this pathway for the Humber Estuary SAC. The relevant Evidence Notes (ENs) to the appropriate assessment (AA) matrices contained in HRAR Appendix C do not describe any operational mitigation. ES Chapter 8 paragraph 8.7.13 [APP060] explains that a Framework Surface Water Drainage Strategy (fSWDS) [APP-098] has been developed to manage operational surface water runoff. However, the only references in the HRAR to the fSWDS are in relation to operational water quantity, level and flow effects. Please set out within an updated HRAR the proposed mitigation for operational water quality LSE.	References to operational water quality have been corrected in an HRA update for Deadline 2 to reference the Lower Derwent Valley SAC and Humber Estuary SAC. The update to the HRA includes a more detailed discussion of operational water quality impacts in Section 8.2, including evidence from the Framework Surface Water Drainage Strategy **[APP-098]**.

ExQ1	Respondent	Question	Applicant's Response
Q2.1.10	The Applicant	The information contained in HRAR Section 8.4 in relation to LSE arising from the potential loss of FL habitat in the operational phase on non-breeding birds is inconsistent both within that section and with that contained in Section 8 Tables 11 and 12 (incorrectly referenced as Tables 13 and 14): • para 8.4.5 states that potential impacts on greylag goose were excluded for reasons including no significant presence of suitable supporting habitat within the application site; no records obtained in the non-breeding bird surveys; and maximum foraging distances. (It also refers to HRAR paragraphs that do not exist; it is assumed the references should be to paragraphs 8.4.6 and 8.4.10.) However, para 8.4.7 and Table 12 identifies that the peak count for greylag goose within the application site equated to 5.6% of the Humber Estuary Special Protection Area (SPA)/Ramsar site population (3.4km away) and Table 11 indicates that they have a maximum foraging distance of 10km and there is potentially FL habitat within the application site. Paragraph 8.4.7 states that the peak count of 80 pink-footed goose (PFG) is "well below" the 1% threshold for the qualifying population of the Humber Estuary SPA and Ramsar site (shown in Table 12 as equating to 0.3% of the population), however they are assessed. It is not explained why effects on PFG are included but effects on greylag goose are excluded (although they are subsequently referenced within the HRAR); and • para 8.4.7 states that the peak count of golden plover (36) equated to 0.9% of the qualifying population (4,120) of the Lower Derwent Valley SPA/Ramsar site). In Table 12 the golden plover population of the Lower Derwent Valley SPA/Ramsar site is shown as 3,131, with the 36 individuals recorded as equating to 1.1% of the population. Paragraph 8.4.9 states that the survey results indicated that golden plover reached abundances over 1% of the qualifying population (which is inconsistent with para 8.4.7 but consistent with Table 12). Please explain these inconsistencies and discrepancies and confirm whether greylag goose were included in the AEoI assessment for the Humber Estuary SPA and Ramsar site.	The references to Tables 11 and 12 (formerly incorrectly referenced as Tables 13 and 14) and paragraphs cross-references have been corrected in an updated HRA submitted at Deadline 2. For clarity, the reason no mitigation is specifically provided for greylag goose is set out in paragraph 8.4.13 of the submitted HRA **[APP-244]**. An addition to paragraph 8.4.5 has been made to clarify that not all reasons for exclusions apply to all of the listed species. For example, regarding greylag goose a. and b. do not apply, but impacts to this species are excluded on the basis of biogeographic population patterns (see paragraph 8.4.9 **[APP-244]**). Greylag goose are included in the AEoI assessment, but no bespoke mitigation for this species is needed, as agreed with Natural England and reflected in their Relevant Representations. A further amendment has been made in relation to pink-footed goose, referencing the most recent survey data and specifying that the maximum recorded number in the 2023/24 survey (515 individuals) amounted to 2% of the Humber Estuary SPA qualifying population. Since mitigation was provided despite the pink-footed goose population being below 1% of the SPA population based on previous surveys this does not materially affect the mitigation requirement. The population total of golden plover for the Lower Derwent Valley SPA (and resulting percentage records in the wintering bird surveys) has been made consistent throughout the HRA.
Q2.1.11	The Applicant	Section 8 paragraph 8.4.5 refers to information contained in Table 11 on maximum foraging distances, supporting habitats and preferred foraging resources for the qualifying bird species of the Lower Derwent Valley SPA and Ramsar site and Humber Estuary SPA and Ramsar site. It lists a number of species for which FL habitat was concluded to be potentially present on the application site but for which impacts had been excluded. This includes mallard and little egret, however mallard has been omitted from Table 11; and in respect of little egret it is indicated	The omission of mallard from Table 11 has been rectified in an HRA update for Deadline 2. Table 11 has also been updated to identify the potential presence of functionally linked habitat for little egret and mallard within the Order limits. However, any impacts on their qualifying SPA populations are excluded on the basis of information already presented in the HRA paragraph 8.4.11 **[APP-244]** (i.e. the Site lying beyond the core foraging ranges for both species).

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		within Table 11 that there is no potentially FL habitat present on the site. Please confirm whether these are textual errors.	
Q2.1.12	The Applicant	Reference is made in HRAR paragraph 8.1.9 to the 'Ecology Mitigation Zone' (depicted on HRAR Appendix A Figure 7) in the context of it being a representative location for noise modelling; and in Table 13 in relation to cropping data. It is not explained in the HRAR what this comprises and no reference is made to it in ES Chapter 8 (Ecology) [APP-060]. Please confirm that this was an error and intended to refer to the Ecology Mitigation Area(s).	These were typographical errors that have now been changed to state 'Ecological Mitigation Area' in an update of the HRA for Deadline 2.
Q2.1.13	The Applicant	HRAR paragraph 8.4.22 states that a 'master spreadsheet' would detail the future cropping rotations within the Goose Mitigation Zone and will accompany a legal agreement with the relevant landowners (in relation to the mitigation activities they would undertake). No additional information is provided on the level of engagement or agreement to-date with the relevant landowners, and the Framework Landscape and Ecological Management Plan [APP-246], which contains the proposed measures, makes no reference to the spreadsheet or legal agreement(s). Please set out the position in respect of relevant discussions with landowners and explain how and where this mitigation is secured.	The Framework LEMP **[APP-246]** is the document that sets out broad principles regarding the provision of ecological mitigation, including with regard to functionally linked habitat loss. A reference to the requirement for a master spreadsheet detailing the cropping rotation within the Goose Mitigation Zone has been included in an updated version of the Framework LEMP. A final, and more detailed, LEMP will be produced post-consent and pre-commencement of construction works for the Scheme; this is secured by Requirement 6 of the Draft DCO **[AS-008]**. Precise details on the cropping schedule and engagement/level of agreement with landowners will be provided at this stage.
Q2.1.14	The Applicant	Please submit the bird surveys for the 2023/2024 passage/wintering period to the Examination (that it is noted may potentially result in changes to the HRAR/matrices and the proposed mitigation).	The data for the 2023/24 passage/wintering bird surveys is included in Appendix D of an updated HRA submitted at Deadline 2, which includes monthly peak counts, general observations on recorded bird flocks and more detailed comments on selected target species. An evaluation of survey data concludes Appendix D of the updated HRA. The updated non-breeding bird data (particularly the size of fields in which peak counts of pink-footed goose and golden plover were recorded) will be discussed in light of the mitigation proposals in the submitted HRA **[APP-244]**. The entirety of the mitigation zone for Golden Plover, a total of 28.75ha, will now be managed for the species to mitigate functionally linked habitat loss, instead of the 15ha of this zone previously reported . This reflects the larger bird abundances recorded/field sizes occupied in the 2023/24 surveys. This updated requirement is reflected in the AA matrices for the Humber Estuary SPA/Ramsar and Lower Derwent Valley SPA/Ramsar. Note this does not change the overall size of the Mitigation Zones required as the area identified was larger than the minimum required.
Q2.1.15	The Applicant	Please provide justification for its use of the 2013 Institute of Estuarine and Coastal Studies (IECS) Waterbird Disturbance Mitigation Toolkit in relation to noise disturbance (HRAR para 8.1.3).	All references to the toolkit have been removed from the AA of noise and visual disturbance in an update to the HRA submitted at Deadline 2, since Natural England has not advocated its use in noise impact assessments and the actual assessment in the submitted HRA **[APP-244]** was in any event not based on this specific distance but on noise decay contours specific to the Scheme.
Q2.1.16	The Applicant	The screening matrices contained in HRAR Appendix B appear to contain a number of errors and omissions:	The screening matrix for the River Derwent SAC has been updated for Deadline 2 to address the inconsistencies identified.

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		• the information within the matrices and accompanying ENs that identifies whether LSE from particular pathways is or is not excluded is not consistent with that contained in the HRAR main text, nor between the matrices and their respective ENs. For example, in respect of the River Derwent SAC screening matrix (Table 14) HRAR Section 6.3 concludes that operational visual disturbance will not result in LSE (on any European site), however it is indicated within the SAC matrix and EN b that it was taken forward to AA in respect of otter; operational water quality LSE is stated in HRAR paragraph 6.3.12 as taken forward to AA but shown as excluded in the matrix; • the information provided in respect of noise and visual disturbance is unclear. Although in the HRAR main text they are separated out where different conclusions on LSE apply to each, they are presented together as one pathway in the matrices, so the ENs do not reflect the HRAR conclusions; • EN a is shown within Table 14 under operational water quality, however that particular EN relates to disturbance from noise and vibration; • Table 14 includes INNS although it was not identified as a potential impact pathway for this European site; • Tables 15 – 19 (Lower Derwent Valley SPA, Lower Derwent Valley Ramsar site, Humber Estuary SPA, Humber Estuary Ramsar site and Humber Estuary SAC, respectively) do not include INNS although it was identified as a potential impact pathway for these sites (and also the Lower Derwent Valley SAC for which matrices were not provided); • Tables 17 - 19 (Humber Estuary SPA, Humber Estuary Ramsar site and Humber Estuary SAC) do not include atmospheric pollution although it was identified as a potential impact pathway for these sites; and • in-combination effects (ICE) have been omitted from the screening and integrity matrices. Please explain these apparent errors and omissions and provide corrected and updated matrices that are consistent with the HRAR main text.	Tables 15-19 have been updated with an assessment of the impact pathway 'introduction of INNS'. Tables 17-19 have been updated with an assessment of the impact pathway 'atmospheric pollution'. Screening and AEoI matrices have now been included for the Lower Derwent Valley SAC.
Q2.1.17	The Applicant	Screening and integrity matrices have not been provided for the Lower Derwent Valley SAC although potential impact pathways were identified for this site, for some of which LSE were predicted. Please provide these matrices and ensure that they are consistent with the HRAR main text.	Screening and AEoI matrices for the Lower Derwent Valley SAC have been included in an update to the HRA submitted for Deadline 2.
3.	**Climate Change**		

ExQ1	Respondent	Question	Applicant's Response
Q3.0.1	The Applicant	ES Table 6.2 Statutory consultation responses. NE and the Ouse and Derwent Internal Drainage Board (IDB) expressed concern over the effect of the proposal on soil properties. Please expand on the limitations of the assessment of this matter and your degree of confidence in its findings.	As stated in Table 6-2 of the ES Chapter 6: Climate Change **[APP-058]**, the impact that the Scheme may have on soil carbon storage is difficult to quantify. However, the in-combination climate change impact (ICCI) assessment takes into consideration, as far as is practicable, the combined effects of climate change and the Scheme on surrounding sensitive receptors, including risks to soil of erosion and structural damage. The ICCI Assessment details further the possible impacts of the Scheme on soil properties and where to find further information and mitigation measures, such as the Framework CEMP **[APP-238]** and the Framework Soil Management Plan (SMP) **[APP-241]** that were included within the DCO application. Paragraphs 6.7.9 and 6.7.27 of the ES Chapter 6: Climate Change **[APP-058]** discuss the impact of the Scheme on carbon storage within the soil. Land use change has been excluded from the GHG assessment as it is anticipated to have a beneficial impact due to measures secured through the Framework Soil Management Plan **[APP-241]** to safeguard soil resources, which would largely be reversed during decommissioning leaving a net neutral impact. The approach taken is considered to be robust and worst-case scenario.
Q3.0.2	The Applicant	ES6.4.4. (a) Please provide further detail on the methodology and assumptions used in the findings on embodied carbon. The Jolywood Environmental Product Declaration appears not to take into account carbon emissions from the transport of the panels from China or similar originating countries to the application site. (b) Where is this impact considered?	The Jolywood Environmental Product Declaration (EPD) covers the embodied carbon emissions of the panels to the "factory gate". The emissions for transport to the site of the Proposed Scheme have been calculated separately for the appropriate mass of the panels required. These calculations cover sea freight from China to a UK Port and HGV transport to the site. The embodied emissions arising from transportation of the PV panels is included in the "Transportation of Products and Materials" figure quoted in Table 6-16 and assessed within Section 6.7 subsection Lifecycle GHG Impact Assessment of the ES Chapter 6: Climate Change **[APP-058].**
Q3.0.3	The Applicant	ES6.4.7. Table 6.3 and ES6.7.19. Please expand on the effects of periodic replacement and end of life disposal of components containing sulphur hexafluoride (SP6).	As stated in Paragraph 6.4.7 of the ES Chapter 6: Climate Change **[APP-058]**, the Applicant has confirmed that although there will most likely be sulphur hexafluoride (SF_6) within the switchgear located at the Field Stations, these will be 'sealed for life' solutions with extremely low anticipated leakage rates. In terms of disposal of these at their end of life, standard practice will be followed, whereby strict waste management protocols will be adhered to and all components containing SF_6 will be disposed of appropriately and responsibly, without releases to the atmosphere. The Framework Site Waste Management Plan **[APP-124]** would apply which ensures the undertaker and its contractors comply with the waste hierarchy and use licensed waste carriers. This is secured by Requirement 11(3) of Schedule 2 of the draft DCO.
Q3.0.4	The Applicant	ES6.4.8. IEMA guidelines state that a comparable baseline should be used as a reference point, which may be based on an alternative design 'for a project of this type.' As well as the use of the Combined Cycle Gas Turbine, please give consideration to using a comparison with other solar farm designs/locations in order to aid the understanding of the relative merits of the scheme.	As stated in Paragraph 6.7.36 of the ES Chapter 6: Climate Change **[APP-058]**, each alternative low-carbon technology will have a different carbon intensity figures, making it challenging to directly compare the carbon impact of a specific installation with broader generation technology. However, the following sources have suggested a range of anywhere between 9 gCO_2e/kWh and 280 gCO_2e per kWh for solar photovoltaic systems: • Sherwana et al (2010). Lifecycle assessment of solar PV based electricity generation systems: a review. *Renewable and Sustainable Energy Reviews.* Vol 14, 1 pp540-544 • Wu et al (2021). Is solar power renewable and carbon-neutral: Evidence from a pilot solar tower plant in China under a systems view. *Renewable and Sustainable Energy Reviews.* Vol 138

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The carbon intensity of the Scheme, listed in Paragraphs 6.7.31 and 6.7.33 of the ES Chapter 6: Climate Change **[APP-058]**, therefore sits towards the lower end of this range at 15.1 gCO_2e/kWh when considering lifetime emissions or 4.1 gCO_2e/kWh when considering operational emissions only. For reference, other solar NSIPs currently under examination or otherwise accepted have listed the following carbon intensities in their DCO applications. It should be noted that all these schemes include the use of Battery Energy Storage Systems (BESS), which may push up the carbon intensity but this results in other benefits for grid balancing purposes. Any publicly available details on these systems in relation to the GHG impact assessment have been included in the table below for additional context.

Solar Project	Carbon Intensity (gCO_2e/kWh)
Cottam Solar Project	21.2 (lifetime carbon intensity) BESS included – assumed replaced once over 40-year lifespan. Maximum storage capacity estimated at either 1,357MWh (Option A) or 2,772MWh (Option B)
Longfield Solar Farm	49.2 (lifetime carbon intensity) 17.1 (operational carbon intensity) BESS included – assumed 1,600 MWh storage capacity
West Burton Solar Project	7.72 (lifetime carbon intensity) BESS included – 159MWh storage capacity, assumed replaced once in 40-year lifespan
Tillbridge Solar Project	70.0 (lifetime carbon intensity) 50.9 (operational carbon intensity) BESS included – assumed replaced every 10 years, savings from use not included in overall GHG impact assessment
Sunnica Energy Farm	29.2 (lifetime carbon intensity) BESS included

The existing use of unabated CCGT generation remains the key comparison however, as this is the existing marginal fossil-fuelled generation technology that solar farms seek to displace. This represents the BAU case and therefore highlights the most realistic carbon benefits of the Proposed Scheme.

ExQ1	Respondent	Question	Applicant's Response
Q3.0.5	The Applicant	ES6.6 . Please expand on the consideration given to minimising embedded carbon in the selection and specification of the components used in the scheme.	The large majority of the embodied carbon from materials in the Scheme is attributed to the PV panels (approximately 58%). Therefore, to reduce embodied carbon emissions of the Scheme the Applicant is relatively limited to what PV panels are available on the market. However, as the Jolywood EPD used is based on the mix of energy sources on the Chinese grid at the time of publication (2020), this is already a conservative estimate as Chinese grid carbon intensity has fallen since then as low-carbon generation technologies (including solar PV) account for an ever greater share of the generation mix. This trend is expected to continue, leading to further decarbonisation of the Chinese grid with a consequent reduction in the embodied carbon of components manufactured there. The Applicant has committed to maximising the use of alternative materials with lower embodied carbon such as locally sourced products and materials with a higher recycled content, as set out in Table 1 of the Framework CEMP **[APP-238]**, which is secured by Requirement 11 of Schedule 2 of the draft DCO.
Q3.0.6	The Applicant	ES Tables 6-15 and 6-16. (a) Please provide the sources for the embodied emissions in the materials used and activities undertaken. (b) Do the figures in Table 6.15 include the materials used in the grid sub-stations, field station units and switchroom buildings?	(a) Further to the use of EPDs for the manufacture of PV modules discussed above, emissions factors were sourced from the Embodied Carbon - ICE Database for materials and government conversion factors for activities such as fuel and water use, transportation of materials, worker transport, and waste. (b) For the assessment of embodied carbon at the construction phase, a complete Bill of Quantities was unavailable at the time. Materials for similar schemes were pro-rated on a MW capacity basis, an approach deemed acceptable in the IEMA guidance for assessing GHG emissions which states "*if [activity data specific to the project] is not available, an alternative approach would be to fall back on generic or publicly available information that best represents the project and its activities".* This assessment covers materials required for grid sub-stations, field station units, and switchgear control rooms. In the context of the whole life carbon impact, building materials may account for approximately 0.24% of construction phase emissions based on similar solar schemes, and would therefore not be considered material to the GHG assessment nor, more importantly, affect the evaluation of significance.
Q3.0.7	The Applicant	ES6.7.30. Please provide a source for the 'typical' yield figure of 922-kilowatt hour per kilowatt-peak per year and explain why a 'typical' yield is appropriate to assess the application scheme.	922 kWh/kWp/yr is a representative yield value assumed for the purposes of the ES based on the conservative modelling case undertaken for the Scheme. Subsequent modelling, not available at the time the ES chapter was drafted, indicates an even higher yield can be achieved. The use of the 922 kWh/kWp/yr yield figure, therefore, represents a worst case scenario in terms of lifetime generation, and understates the net carbon benefits of the Scheme relative to the counterfactual scenario of generating electricity using existing, unabated, combined cycle gas turbines.
Q3.0.8	The Applicant	ES6.7.34. Please provide comparable representative carbon intensity figures for other forms of renewable energy – especially solar and wind - in order to understand the relative efficiency of the application proposal.	As stated in Paragraph 6.7.36 of the ES Chapter 6: Climate Change **[APP-058],** each alternative low-carbon technology will have a different carbon intensity figures, making it challenging to directly compare the carbon impact of a specific installation with broader generation technology. However, the following sources have suggested a range of anywhere in the range of 9gCO_2e/kWh – 280 gCO_2e per kWh for solar photovoltaic systems, 10gCO_2e/kWh – 345gCO_2e/kWh for solar thermal power plants (both central tower and parabolic trough plants), 8gCO_2e/kWh – 30 gCO_2e/kWh for onshore wind and 9 gCO_2e/kWh – 19 gCO_2e/kWh for off-shore turbines. Please note these sources are not open access and assess carbon intensity from a variety of locations not specific to the application proposal area, so care should be taken when comparing these values to the estimated carbon intensity of the Scheme:

ExQ1	Respondent	Question	Applicant's Response
			• Sherwana et al (2010). Lifecycle assessment of solar PV based electricity generation systems: a review. Renewable and Sustainable Energy Reviews. Vol 14, 1 pp540-544 • Wu et al (2021). Is solar power renewable and carbon-neutral: Evidence from a pilot solar tower plant in China under a systems view. Renewable and Sustainable Energy Reviews. Vol 138 • Marimuthu, C. and Kirubakaran, V. (2013). Carbon payback period for solar and wind energy project installed in India: A critical review. Renewable and Sustainable Energy Reviews. Volume 23 pp80-90 • Cao et al (2024). Life cycle environmental analysis of offshore wind power: A case study of the large-scale offshore wind farm in China. Renewable and Sustainable Energy Reviews. Vol 196
Q3.0.9	The Applicant	EN-1(24) paragraph 5.3.7 seeks the submission of a Greenhouse Gas (GHG) Reduction Strategy secured under the DCO. Please clarify how the proposal meets this requirement.	The amendment to EN-1(24) regarding paragraph 5.3.7 came into effect in January 2024 after its publication in November 2023. The DCO application for the Scheme was submitted in November 2023 prior to this requirement being secured and as such a Greenhouse Gas (GHG) Reduction Strategy was not required at the time of the DCO application submission. The Applicant notes however that the envisaged content of the GHG Reduction Strategy in NPS EN-1 is already available within the DCO Application documents. Specifically, information on embodied carbon and lifecycle GHG assessment is available in the Climate Change chapter including impacts on soil health and carbon storage. Mitigation and enhancement measures for Climate Change are secured in the Framework management plans, specifically Table 1 of the Framework CEMP **[APP-238]**, Table 1 of the Framework OEMP **[APP-239]**, and Table 1 of the Framework DEMP **[APP-240]**. Each of these managements plans is secured by DCO requirement (Requirement 11, Requirement 12 and Requirement 18 respectively). In addition, the Applicant is committed to enhancing ecology and biodiversity as secured in the Framework LEMP **[APP-246]**, also secured by DCO Requirement 6, and the delivery of BNG (Requirement 7) and the management of soils (Requirement 15). As such, all of the relevant information is already before the Examination and it is not considered that an additional document would serve any additional useful purpose.
4.	**Compulsory Acquisition, Temporary Possession and Other Land or Rights Considerations**		
Q4.0.1	The Applicant	The Schedule of Negotiations and Powers Sought [APP-024] is ordered by the name of landowners, whereas the Book of Reference (BoR) [AS-012] is ordered according to the plot numbers on the Land Plan [AS-004]. This makes it difficult to cross-reference the two documents. Please consider providing a version of the Schedule of Negotiations and Powers Sought ordered in the same way as the BoR.	The Schedule of Negotiations and Powers Sought has been updated to reflect the order of the Book of Reference and has been submitted at Deadline 1.
Q4.0.2	The Applicant	Please respond to the concerns of the Canal and River Trust [RR-036] regarding Plot 18/109 in the BoR.	The Applicant has updated the Book of Reference to remove the Canal and River Trust as having an interest in the River Derwent in respect of maintenance (Plot 18/09). This update to the Book of Reference has been submitted at Examination Deadline 1.
Q4.0.3	The Applicant	Please respond to the EA's concerns [RR-107] regarding omissions from the BoR.	The Applicant has carried out diligent enquiry to identify all persons with an interest in the Order land which fall within the categories in section 57 of the Planning Act 2008, and therefore have to be recorded in the Book of Reference pursuant to Regulation 7 of the Infrastructure Planning (Applications, Prescribed Forms and Procedure) Regulations 2009.

ExQ1	Respondent	Question	Applicant's Response
			The Applicant has written to the Environment Agency to seek to obtain information on the interests referred to in the relevant representation but to date has not received a response. Land Interest Questionnaires have also been issued to the three Farm Business Tenancy occupants for which contact details were provided to obtain further details and clarity for the inclusion of the interests in the Book of Reference. Once sufficient information is available then the Book of Reference **[AS-012]** can be updated to reflect these.
Q4.0.4	The Applicant	There appears to be an inconsistency for Plot 9/58 between Parts 2 and 3 of the BoR, when compared to the Land Plan and Table 1 of the Schedule of Negotiations and Powers Sought. While this plot is described as permanent acquisition of new rights in Parts 2 and 3 of the BoR, the Land Plan and Table 1 of the Schedule of Negotiations and Powers Sought describe the plot as being subject to temporary possession in Part 1. Please clarify the position.	The Applicant has updated the Book of Reference to rectify the inconsistency of land type description. Plot 9/58 description has been changed in Parts 2 and 3 of BoR to match that of Part 1 of the BoR, Land Plan, Table 1 of the Schedule of Negotiations and Powers Sought.
5.	**Draft Development Consent Order (DCO)**		
5.0	**Articles**		
Q5.0.1	The Applicant	Art 2 Many of the Requirements secure mitigation measures prior to commencement. The dDCO also allows for 'permitted preliminary works' to take place before commencement. These works include activities such as site preparation, remedial works, diversion and laying of apparatus and provision of temporary means of enclosure which may have environmental effects. a) Would this include the works described in ES8.6.13-16? b) How will these activities be controlled and mitigated when they could be carried out in advance of commencement and the approval of the detailed CEMP and LEMP?	(a) Yes "permitted preliminary works" include the provision of temporary measure of enclosure and site security i.e. temporary fencing, plus site clearance, including vegetation removal, demolition of existing buildings and structures. As such, the activities referred to in paragraphs 8.6.13 – 8.6.16 of Chapter 8 of the ES **[APP-060]** would fall within this definition, if carried out prior to other works which did trigger "commencement" being carried out. (b) Any temporary fencing (as referred to at paragraph 8.6.16 of Chapter 8 of the ES **[APP-060]**) is already controlled and mitigation secured by Requirement 8 (fencing and other means of enclosure) of the draft DCO. Requirement 8(1) requires details of proposed temporary fencing etc. to be submitted to and approved by the relevant local planning authority prior to commencement. Requirement 8(3) confirms that for the purposes of this requirement, "commencement" includes permitted preliminary works. In effect, this means that the Applicant must not carry out permitted preliminary works until details of proposed temporary fencing for the Scheme has been approved by the relevant planning authority. Any permanent fencing does not fall within the definition of "permitted preliminary works" and would therefore trigger "commencement" and Requirement 8(2) and other relevant Requirements to be discharged. This approach is well precedented in made DCOs including in the Longfield Solar Farm Order 2022. With regards to vegetation removal, The Applicant has considered the point regarding 'permitted preliminary works' and considers that one additional requirement is relevant to the limited scope of

ExQ1	Respondent	Question	Applicant's Response
			those works. As such, the Applicant has updated the draft DCO at Deadline 1 to include a new requirement 6(3), which states the following: *"For the purposes of sub-paragraph (1), "commence" includes part (h) (site clearance (including vegetation removal, demolition of existing buildings and structures)) and part (i) (advanced planting to allow for an early establishment of protective screening) of permitted preliminary works".* The effect of this amendment is to require the Landscape and Ecological Management Plan to be discharged before any site clearance or advanced planting works are carried out as part of the permitted preliminary works. This wording goes beyond the controls in made DCOs such as Cleve Hill Solar Park Order 2020 and Longfield Solar Farm Order 2022. It is similar drafting to that in the draft DCO for Gate Burton Energy Park, which has completed Examination and is awaiting determination.
Q5.0.2	The Applicant	Art 2 Please clarify what is meant by 'each part' of the authorised development in the definition of 'date of final commissioning'.	The Applicant has reviewed the drafting of the definition of "date of final commissioning" and considers that the words "each part" are not required. The date of final commissioning is the date of the final commissioning of the Scheme not any constituent parts. The Applicant has updated this definition in the draft DCO at Deadline 1.
Q5.0.3	The Applicant	Art 6 a) For each disapplication sought, please provide an explanation of the effect of disapplication including how any protective provisions, Requirements or other controls would prevent any adverse impact arising. b) Please provide an update on the negotiations with the regulators affected by clauses (a), (d) and (f) in order to comply with the terms of section 150 of the PA2008.	(a) For a full explanation of the disapplication sought, the Applicant refers to paragraphs 5.2.11 – 5.2.17 of the Explanatory Memorandum. In particular, though, these disapplications are sought on the basis that they address matters whose merits and acceptability can, and will, already have been sufficiently considered and resolved if the Order is made, notably in relation to the provisions under the Land Drainage Act 1991, the Water Resources Act 1991, the Water Industry Act 1991 and the Environmental Permitting (England and Wales) Regulations 2016 through protective provisions for the protection of the relevant drainage authorities and the Environment Agency (3 and 8 of Schedule 14 to the Order). Such matters should therefore not be the subject of further regulatory consideration or control, which would cause unnecessary uncertainty and duplication, and may unjustifiably delay the implementation of the Scheme. (b) The regulators affected by clauses (a) and (d) are the Canal and River Trust and the relevant drainage boards for the area, whilst the Environment Agency is affected by clause (f). The Applicant refers to the updated Schedule of Negotiations [DL1 REF] for an update on the latest negotiations with these bodies.
Q5.0.4	The Applicant	Art 9 a) Applicant Please provide further justification of the need for the powers under this Art having regard to its potential effects on vehicular and pedestrian access. (b) Applicant and the LPAs Should the requirement to restore altered streets at clause 3 be subject to a time limit for completion of the restoration work?	(a) Article 9 is required to enable the Applicant (as undertaker) to carry out permanent and temporary alterations to the layout of streets to facilitate the construction, operation and maintenance and decommissioning of the Scheme. Article 9(1) authorises the Applicant to carry out the permanent alteration of streets specified in Part 1 of Schedule 5. The location of these permanent alterations is specified on the Streets, Rights of Way and Access plans. The purpose for which these permanent alterations are required are split into two categories:

ExQ1	Respondent	Question	Applicant's Response
			(i) Existing field access to be closed. This is required as the field access will be inaccessible during the lifetime of the scheme due to the presence of the Scheme infrastructure. (ii) Proposed access to be constructed or upgraded. This is required as the access location is required to facilitate access to the Scheme during its construction and/or operation. Article 9(1) also authorises the Applicant to carry out the temporary alteration of streets specified in Part 2 of Schedule 5. The location of these temporary alterations is specified on the Streets, Rights of Way and Access plans. These temporary alterations are required to facilitate the construction of the Scheme only, and so have been included on a temporary basis. In each case, the identification of these permanent and temporary alterations is the result of site selection and transport assessment work, with each having been identified as necessary and expedient to deliver the Scheme. Article 9(2) does contain a power for the undertaker to alter any street, however importantly this is subject to sub-paragraph (4) which states that the power must not be exercised without the consent of the street authority. As such, sufficient control on the use of this power is catered for. It is considered appropriate to include these powers within the draft DCO, to remove the need for separate street works licences to be sought whilst retaining the oversight of the streets authority, noting the intention of the DCO regime is to cater for a single consenting regime. By including these powers within the draft DCO, the Applicant is therefore also ensuring that the mitigations and commitments in the Requirements apply to their carrying out. This includes the protections in Article 10 and the Framework CTMP, Framework CEMP and Framework OEMP which would apply to the construction and use of these altered streets. (b) The Applicant considers it unnecessary to specify a timescale for the restoration of a temporary alteration of the layout of a street. Article 10 provides sufficient protection with regards to these works and ensures at all times the maintenance and restoration of the layout is the responsibility and the expense of the undertaker, all to the street authority's satisfaction. This is secured by Article 10(2), which requires any temporary alterations to a street layout to be completed to the reasonable satisfaction of the street authority and maintained by and at the expense of the undertaker. The undertaker will therefore be legally obliged to maintain the altered street by virtue of this provision until its restoration. Article 10(3) goes on to provide that any restoration works under Article 9(3) must be completed to the reasonable satisfaction of the street authority and must be maintained for a period of 12 months from their completion, by and at the expense of the undertaker. As such, either the undertaker is legally obliged to maintain the street, or it is legally obliged to restore (and thereafter maintain for 12 months) the street. Imposing a time limit on restoration would serve no useful purpose.

ExQ1	Respondent	Question	Applicant's Response
Q5.0.5	The Applicant	Art 11 Please provide further justification of the need for the powers under this Art having regard to its potential effects on vehicular and pedestrian access.	Article 11 is required to enable the Applicant (as undertaker) to manage streets and public rights of way to ensure the safe carrying out of the Scheme. Article 11(1) is a broad power however it is limited by the remainder of the provisions in Article 11, and otherwise controlled by the Requirements secured in Schedule 2 of the draft DCO. Article 11(3) specifies, with reference to the different parts of Schedule 6, those streets and public rights of way which may be temporarily closed and/or diverted, managed and used by the undertaker. These streets are shown on the Article 11(4)(a) and provides that the undertaker may only exercise the power under Article 11(3) after it has consulted the street authority. This consultation requirement is considered appropriate and proportionate as these streets and public rights of way measures have been identified and Examined as part of the DCO application. Article 11(4)(b) provides that the undertaker must only exercise any other power under the article (i.e. close up / divert etc. any street or public right of way not specified in Schedule 6) with the consent of the street authority. This consent requirement is considered appropriate and proportionate as these streets and public rights of way measures would not have been identified and Examined as part of the DCO application. Whilst any such closures are not currently anticipated, this remains subject to detailed design. In each case, the protections in the Framework PROW Management Plan, secured by Requirement 17 and the Framework CTMP, secured by Requirement 13 would apply. Article 11(2) also ensures access to residences abutting the closure and Article 11(5) entitles claims for compensation for loss in respect of any private right of way. Please note, in responding to this question, the Applicant has identified some typographical errors in Article 11 which have been corrected at Deadline 1.
Q5.0.6	The Applicant and the LPAs	Art 11 Should the power under Art 11(1) be limited to public rights of way (PRoW) within the Order Limits?	This is unnecessary as the purpose of Article 11 is to provide a single consenting regime for the undertaker in respect of any temporary street or public rights of way closures. As noted above, to the extent the closure etc. of the street or public right of way has not been identified in Schedule 6, then Article 11(4)(b) provides that the undertaker must only exercise any other power under the article (i.e. close up / divert etc. any street or public right of way not specified in Schedule 6) with the consent of the street authority. This article has been updated at Deadline 1 to correct typographical errors as noted above. In addition, the Applicant has also included a provision enabling the closure of any public right of way added to the definitive map and statement on or after 21 November 2023. This is to ensure that the delivery of the scheme is not impeded by any new public rights of way being designated after submission of the DCO application. The power is appropriately limited because it only applies to

ExQ1	Respondent	Question	Applicant's Response
			public rights of way that are within the Order limits and to new public rights of way that were not recognised in the definitive map and statement at the point of DCO application. The wording aligns with made DCO precedent. For example, it is used to protect against the risk of new Tree Preservation Orders in The A47/A11 Thickthorn Junction Development Consent Order 2022 (Art.39), The A47 Wansford to Sutton Development Consent Order 2023 (Art.40), The A428 Black Cat to Caxton Gibbet Development Consent Order 2022 (Art.43) and The Norfolk Vanguard Offshore Wind Farm Order 2022 (Art.36).
Q5.0.7	The Applicant	Art 12 Should the private roads subject to this Art be identified specifically to give relevant landowners the opportunity to comment on this power?	The Streets Rights of Way and Access Plans [**APP-009 and APP-010**] have been updated at Deadline 1 to show the location of these private roads.
Q5.0.8	The Applicant	Arts 29 and 30 a) Please provide justification for why the wide powers under these Arts (which also allow temporary possession of land not listed in a Schedule) are necessary and appropriate and explain what steps have been taken to alert all landowners, occupiers, etc. within the Order Limits to the possibility that these powers will be exercised. b) Should any provisions relating to notices/counter notices which do not reflect the Neighbourhood Planning Act 2017 (NPA2017) proposed regime (not yet in force) be modified to more closely reflect the incoming statutory regime? For example: • should the notice period in Art 29(2) be three months as set out in the NPA2017 rather than 14 days. Other than precedent, what is the justification for 14 days? • under the NPA2017, the notice would also have to state the period for which the acquiring authority is to take possession. Should such a requirement be included in this case? c) NPA 2017 provisions include the ability to serve a counter-notice objecting to the proposed temporary possession so that the landowner would have the option to choose whether temporary possession or permanent acquisition was desirable. Should this article make a similar provision, whether or not in the form in the NPA 2017?	(a) The Applicant is seeking powers of temporary possession only of the land depicted on the land plans for those powers, and the land plans are linked to the definition of Order land as per article 2 of the draft DCO. The Applicant is also seeking powers of temporary possession over the land over which powers of compulsory acquisition are being sought (of land and rights in land) which are also depicted on the land plans and linked to the definition of Order land. The Applicant requires broad powers of temporary possession over all of the Order land, including the land subject to compulsory acquisition, as it facilitates the construction and maintenance of the Scheme, with lesser interference to the landowner's interests. For example, it is common practice to enter onto land under powers of temporary possession to carry out works to identify the precise extent of land over which compulsory acquisition of permanent rights have to then be exercised be exercised (which are often narrower than the full extent of the Order land as a result of detailed design). If the power of temporary possession was not available, the Applicant would have to exercise powers of compulsory acquisition and do so over a wider area of land, to enable temporary works and to ensure sufficient flexibility for detailed design. That is not in the Applicant or the landowner's interest as it results in a greater interference with private rights than may ultimately be necessary following detailed design. Similarly, the Applicant requires the ability to take temporary possession of land for maintenance works, where compulsory acquisition has not been exercised, to allow it to maintain the scheme. If this power was not available the Applicant would have to exercise its compulsory powers to acquire a permanent right of access plus other rights, which is a greater interference of rights. The Applicant notified all affected persons of the proposed application in accordance with the statutory pre-application requirements of the Planning Act 2008, including consultation under section 42 and notification of acceptance under section 56, and subordinate regulations. A detailed report on the pre-application consultation activities is provided in the Consultation Report **[APP-025]**. (b) The Applicant notes that the regime under NPA2017 is not reflective of current practice and after 7 years has still not come into force. It is specifically disapplied in DCOs, as set out in article 6, and justified in the Explanatory Memorandum. The justification for the time period of 14 days (and the Applicant notes that this is for construction only, with the time period being 28 days for maintenance) is that the Project is a Nationally Significant Infrastructure Project and therefore

ExQ1	Respondent	Question	Applicant's Response
			should not be unduly constrained. The time limit equates to the duration of construction plus 1 year (as per sub-paragraph (4) of Article 29), in respect of construction, and again is limited to the "maintenance period" in respect of maintenance. In addition, the Applicant notes that compensation is payable and Article 29 contains other appropriate protections which are in place. The Applicant does not consider that there is any reason to restrict this Project, in comparison with other solar DCOs which have been made or are awaiting determination. (c) The Applicant does not consider that this would be an appropriate provision. The Applicant must control the Project, which is a Nationally Significant Infrastructure Project, and is ultimately responsible for payment of appropriate levels of compensation. As stated above, NPA2017 is not in force and it would be inappropriate to use the DCO to bring into force legislation which Parliament has not desired to do so.
Q5.0.9	The Applicant	Art 31 Please provide an update on negotiations with statutory undertakers who have made representations which engage s127 of the PA2008.	Please refer to Table 3 of the Schedule of Negotiations which accompanies this Deadline 1 submission for an update in respect of statutory undertakers. Those who have made a representation are: • National Grid Electricity Transmission Plc; • Network Rail Infrastructure Limited; • Environment Agency; • Ouse and Derwent Internal Drainage Board; • Ouse and Humber Drainage Board; • National Gas Transmission Plc; • Northern Gas Networks Limited; • Northern PowerGrid (Yorkshire) Plc; and • Natural England.
Q5.0.10	The Applicant	Art 35 and Art 47 a) Please explain how the guarantees set out in Art 47 would operate in the event that the benefit of the Order was transferred to a holding company or subsidiary of the undertaker in accordance with Art 35(3)(b). b) Should Art 35(5) be amended to require notification of the Marine Management Organisation where a transfer takes place without consent which relates to the provisions of the Deemed Marine Licence (DML)?	(a) Article 47(1) of the DCO requires that a guarantee (or alternative form of security) in a form and amount approved by the Secretary of State is in place before "the undertaker" can exercise certain powers under the DCO, including those of compulsory acquisition. Article 2(1) of the DCO defines "undertaker" as including any transferee of the benefit of the Order pursuant to Article 35 of the DCO: *""undertaker" means East Yorkshire Solar Farm Limited (company number 14103404) and any other person who for the time being has the benefit of this Order in accordance with Article 34(benefit of the Order) or Article 35 (consent to transfer the benefit of the Order);"* Therefore, any "holding company or subsidiary of the undertaker", would fall within the definition of the "undertaker" (regardless of whether the Secretary of State's consent is required for the transfer), and thus cannot exercise powers of compulsory acquisition unless appropriate security is in place under Article 47(1) of the DCO. As such, if the benefit of the Order was transferred in accordance with Article 35 that transferee would be caught within the definition of undertaker and subject to the

ExQ1	Respondent	Question	Applicant's Response
			controls throughout the DCO including Article 47(1). The Applicant considers that this provides sufficient reassurance with regard to the liability to pay compensation. (b) The Applicant has updated article 35(5) at Deadline 1 to include the following: *"Where the consent of the Secretary of State is not required, the undertaker must notify the Secretary of State and, if the transfer or grant of the benefit includes the whole or part of the benefit of the provisions of the deemed marine licence, the MMO in writing before transferring or granting a benefit referred to in paragraph (1)."*
Q5.0.11	The Applicant	Art 38 Please consider changing the word 'near' to 'encroaching on' in clause (1)	The Applicant has updated article 38(1) at Deadline 1 to replace the words "near any part of" to "within or overhanging". This wording is consistent with the draft solar DCOs for the Mallard Pass Solar Project and Gate Burton Energy Park, both of which have completed Examination and are awaiting determination. The words "near any part of" are based on the model provisions and appear in made DCOs including the Cleve Hill Solar Farm Order 2020 and the Longfield Solar Farm Order 2022. Notwithstanding, the Applicant is content to make this change.
Q5.0.12	The Applicant	Art 39 Please provide further information on the trees to which this Art applies and consider whether they should be identified in a schedule.	The Applicant has reviewed the trees subject to Tree Preservation Orders which exist within the Order limits and has satisfied itself that none of the existing trees will be affected by the Scheme. As such, the Applicant has updated Article 39 to provide that no existing trees subject to TPOs may be felled, lopped, pruned or cut back. The Applicant notes the possibility of TPOs being added between DCO application and construction, and as such has provided that the authority under Article 39 will apply to any new TPOs after the date of DCO application. This is considered appropriate as the Scheme is an NSIP, is of critical national priority and should not be unnecessarily or unduly delayed by unknown and unforeseen circumstances relating to TPOs. The requirements of Article 39 provide that any future TPOs could only be removed if it were necessary to prevent interference with the Scheme, and that the undertaker must do no unnecessary damage to the tree. Compensation is payable to any person suffering loss or damage. This drafting has precedence in the Awel Y Mor Offshore Wind Farm Order 2023.
Q5.0.14	The Applicant	Art 47 Please explain why the guarantee in respect of compensation or other form of security cannot be provided during the examination.	It would be unnecessary and disproportionate to require the Applicant to incur the expense required to put such security in place at this stage, given that the DCO is yet to be granted and powers of compulsory acquisition have not yet been granted. These compulsory powers are several years from being from being exercised (and, indeed, may never be exercised as the Applicant's intention is to rely on voluntary land agreements where feasible). A parent company guarantee would have to be on the parent company's balance sheet, and any bank bond or letter of credit would incur an unnecessary significant financial cost. As is standard practice in energy DCO schemes, this decision will be made prior to these compulsory acquisition powers being exercised and is ultimately controlled by the Secretary of State. The Applicant is unaware of any such provision being made for financial security during Examination or DCO determination and considers it would be unnecessary and unjustified to request the security from the Applicant.

ExQ1	Respondent	Question	Applicant's Response
Q5.0.15	The Applicant	Art 49 a) Please consider removing the word 'take' from clause (1). b) Please provide an update on discussions with the Crown authority regarding the requirement for consent under s135(1) of the PA2008.	(a) The Applicant does not consider that this removal is required. This is the standard form of Article within DCOs that the Crown authority requires in order to give its consent and is well precedented, including in the Longfield Solar Farm Order 2023 and the draft DCOs for Gate Burton Energy Park, Cottam Solar Project and West Burton Solar. (b) The Applicant is engaged with solicitors acting for The Crown Estate in relation to obtaining necessary Crown consents pursuant to s135(1) and (2) and is confident that these will be obtained during the course of Examination. The Applicant notes that consent has been issued by The Crown Estate for offshore wind projects and similar crossings of the River Trent for the Gate Burton and Cottam solar projects and sees no reason why similar consent should not be granted here.
5.1	**Schedule 2 - Requirements**		
Q5.1.1	The Applicant	Requirement (R) 3 As currently drafted, this R allows the applicant, with the approval of the LPA, to amend documents certified under the Order and on which any decision to grant consent for the DCO would be based. Having regard to PINS Advice Note 15 (section 17), please consider removing the words 'documents certified under article 40 (certification of plans and documents, etc.) and' from clause 3(1).	The Applicant does not consider that this amendment is required, and it is not considered to be contrary to section 5.3.17 of PINS Advice Note 15. Paragraph 17.1 of AN15 states that: 'Any provisions in the dDCO that allow for flexibility must be thoroughly justified within the Explanatory Memorandum and assessed within the ES' Paragraphs 17.4 and 17.5 of AN15 then go on to provide: "17.4 Therefore, adding a tailpiece (a tailpiece is a mechanism inserted into a condition (or by analogy a Requirement) providing for its own variation) such as the one below would not be acceptable because it might allow the discharging authority to approve a change to the scope of the Authorised Development applied for and examined, thus circumventing the statutory process: "The authorised development must be carried out in accordance with the principles set out in application document [x] [within the Order limits] unless otherwise approved in writing" 17.5 On the other hand, a Requirement might make the development consent conditional on the discharging authority approving detailed aspects of the development in advance (for example, the relevant planning authority approving details of a landscaping scheme). Where the discharging authority is given power to approve such details it will be acceptable to allow that body to approve a change to details that they had already approved. However, this process should not allow the discharging authority to approve details which are outside the parameters authorised within any granted DCO." The approach taken in Requirement 3 of the draft DCO is in accordance with this advice. The circumstances in which the relevant planning authorities can approve any amendments are carefully limited, unlike the open-ended example given at the end of paragraph 17.4 of AN15. Pursuant to Requirement 3(2), any amendment must still be within the assessment outcomes set out in the Environmental Statement. Approval for amendments '**must not be given**' (emphasis added) 'except where it has been demonstrated to the satisfaction of the relevant planning

ExQ1	Respondent	Question	Applicant's Response
			authority or both relevant planning authorities (as applicable) that the subject matter of the approval sought is unlikely to give rise to any materially new or materially different environmental effects from those assessed in the environmental statement'. The draft DCO has therefore been drafted to ensure the Scheme is constructed, operated and decommissioned within certain parameters, and subject to principles, plans and management plans, aimed at controlling the environmental impacts of the Scheme so that they are not worse than those assessed in the Environmental Statement. The restriction in Requirement 3(2) that approval of amendments can only occur in limited circumstances, is drafted to achieve the same objective; that is, that the Scheme when constructed, operated and decommissioned does not result in environmental effects any worse than or different to those in the Environmental Statement. In this way the requirement permits the flexibility paragraph 17 of AN15 refers to, whilst ensuring approved amendments must be within the parameters authorised within the DCO (as per paragraph 17.5). The Applicant notes that this point was tested during the Examination of the Longfield Solar Farm DCO application, via written questions [Applicant's response to First Written Questions at 1.5.27], where a similar response was provided. The Secretary of State subsequently granted the Longfield Solar Farm Order 2023 with the same drafting as is currently being sought by the Applicant, demonstrating this approach has been considered and found to be appropriate in the terms sought. This drafting is also included in the Drax Power Station Bioenergy with Carbon Capture and Storage Extension Order 2024. Similar drafting also appears in the draft DCOs for Gate Burton Energy Park, Mallard Pass Solar Project, Cottam Solar Project and West Burton Solar Project, all of which have completed Examination and is currently awaiting determination.
Q5.1.2	The Applicant	Rs 6, 7, 11, 13, 17 These Rs include the phrase 'substantially in accordance with'. This lacks precision. Please consider an alternative form of words or further definition of the phrase.	The Applicant considers the words "substantially in accordance with" to be sufficiently precise and enforceable for a planning condition relating to an outline or framework plan document. The current outline and framework plans are based on the maximum design scenario for the Scheme and post-consent these plans will be updated and refined to reflect the detailed design of the Scheme. It is therefore necessary for the Applicant to maintain some scope for change in the documents to which these Requirements relate, and any stricter formulation (e.g. "strict accordance") would be inappropriate. The wording aligns with corresponding requirements in the Longfield Solar Farm Order 2023 which demonstrates that the Secretary of State considers this wording to be sufficiently precise and enforceable. It also appears in the latest versions of the DCOs for Gate Burton Energy Park, Mallard Pass Solar Project, Cottam Solar Project and West Burton Solar Project, all of which have completed Examination and is currently awaiting determination.
Q5.1.3	The Applicant	R 11 Atypically, this R on the CEMP does not list the management plans that would be contained in the detailed	The approach taken by the Applicant is typical of the approach taken in recent solar DCOs, including the consented Longfield Solar Farm Order 2023 and the draft DCOs for Cottam, West

ExQ1	Respondent	Question	Applicant's Response
		(post-consent) CEMP. Please confirm which plans will be included in the CEMP and update Requirement 11 of the dDCO accordingly.	Burton, Gate Burton and Mallard Pass solar projects (all of which have completed Examination and are awaiting determination). The Applicant considers it unnecessary to specify each of the sub-plans in Requirement 11, as these are adequately secured with reference to the Framework CEMP. Requirement 11(1) requires a CEMP to be approved prior to commencement of development. Requirement 11(2) requires the CEMP to be substantially in accordance with the Framework CEMP. The Framework CEMP then provides for sub-plans which will form part of the CEMP. For example, the Framework CEMP states that a Water Management Plan will be prepared post-consent as part of the detailed CEMP (page 52). Similarly, the Framework CEMP states that a Biosecurity Plan will be included in the detailed CEMP (page 75). As such, the requirement to provide these plans is adequately secured. The site waste management plan has been specifically referred to in Requirement 11(3) as, unlike the other plans referred to in the Framework CEMP, a Framework Site Waste Management plan was provided as part of the ES. As such it is considered appropriate to specifically reference this Framework Site Waste Management Plan within the requirement to ensure it is secured. Overall therefore, the Applicant considers the approach it has taken to be clear and well precedented in recent solar schemes.
Q5.1.4	The Applicant	R 18 Question: What certainty is there that the Applicant or its successor will undertake the decommissioning works? (a) should the dDCO include provision for a bond or other means of funding the decommissioning works; or (b) supply the provisions within the agreements with site land owners which would secure the decommissioning works?	The Applicant refers to its Summary of Oral Submissions and Post Hearing Notes for Issue Specific Hearing 1 which also address this point. Specifically: (a) No this is not required. Requirement 18 of the DCO provides a clear mechanism for ensuring decommissioning takes place. It is not necessary to provide financial arrangements to secure the decommissioning of the Scheme as the enforcement mechanisms in the Planning Act 2008 are rigorous, where criminal liability is a possible consequence for a breach of a requirement. In addition, the Proceeds of Crime Act 2002 also allows local authorities to seek to recover the profits accruing to businesses and individuals who breach planning control. It is therefore not practice or considered necessary for DCOs to incorporate financial arrangements for decommissioning. (b) The Applicant has entered into Option for Lease agreements for the entire Solar PV site below, the terms of which cover the decommissioning bond provisions, as set out below: *"1. Under the terms of the agreed lease at the end of the term (save where the Landlord exercises a right to acquire the equipment) the Tenant must return the Property to the Landlord with vacant possession and in the state of repair and condition required by the Lease and in accordance with a schedule of condition to be prepared for the Lease of Condition.* *…* *3. …:* *3.1. on or before the 10th anniversary of the date of the Lease, the Tenant will (at its own cost) obtain an estimate ("Reinstatement Estimate") from an independent and suitable qualified chartered surveyor of not less than 10 year's post qualification who shall have substantial and recent working*

ExQ1	Respondent	Question	Applicant's Response
			knowledge and experience in the removal and decommissioning of equipment similar in type to the equipment of the costs of complying with the Tenant's obligations to repair and reinstate and to include the costs of re-draining the Premises and of complying with any Planning Agreement (the "Reinstatement Cost") and the value of the Equipment (the "Valuation") *3.2. on or before the 10th anniversary of the date of this Lease the Landlord and the Tenant will secure a bond with a reputable bank or open a bank account (at the cost of the Tenant) in the joint names of the Landlord and the Tenant ("Reinstatement Bond Account") on trust for or charged to the Landlord or in such other format as is not caught by the repayment provisions of s238 Insolvency Act 1986;* *3.3. the Tenant will pay into the Reinstatement Bond Account the Reinstatement Estimate on or before the 10th anniversary of the date of the Lease* *3.4. on the 15, 20th, 25th, 30th and 35th anniversaries and within the 12 months prior to the expiry of the Term the Tenant will ask the surveyor to confirm the Reinstatement Estimate and if it is no longer accurate then the Tenant shall ask the surveyor at the reasonable cost of the Tenant to provide a revised Reinstatement Estimate and if the revised estimate of the Reinstatement Cost is greater than together the sum of (i) the amount then held in the Reinstatement Bond Account and (ii) the revised Valuation then the Tenant shall pay into the Reinstatement Bond Account within three months of receiving the revised Reinstatement Estimate an amount which is the difference between (i) the amount then held in the Reinstatement Bond Account plus the revised Valuation and (ii) the revised Reinstatement Cost.* *3.4. within the last three years of the Term the Tenant shall be permitted to draw such amounts from the funds accrued in the Reinstatement Bond Account as are reasonably required to comply with its obligations regarding reinstatement in the Lease and the Landlord shall sign any documents required to enable such withdrawal provided that the withdrawal of funds accrued in the Reinstatement Bond Account shall be authorised in stages of no more than 10% of the Reinstatement Bond at one time and all payments shall be paid directly to the reputable contractor employed to work for the Tenant following productions of an invoice and the Landlord being supplied with a copy of the contract between the Tenant and the contractor, after each relevant stage of works is completed .* *3.5. if the Tenant fails to comply with its obligations in the Lease, the Landlord shall be entitled to withdraw such sum from the Reinstatement Bond Account (and the Tenant appoints the Landlord as attorney to sign any documents required to enable the Landlord to make such withdrawal). The withdrawal of funds accrued in the Reinstatement Bond Account shall be authorised in stages of no more than 10% of the Reinstatement Bond at one time and all payments shall be paid directly to the reputable contractor employed to work for the Landlord following production of an invoice following productions of an invoice, after each relevant stage of works is completed including any reasonable ancillary costs such as public liability insurance and reasonable professional costs in controlling and supervising such works provided however if the reasonable cost of carrying out and completing those work."*
5.2	**Schedule 3 and Article 6 – Legislation to be modified or disapplied**		

ExQ1	Respondent	Question	Applicant's Response
Q5.2.1	The Applicant	Please provide an update on progress with the relevant bodies in relation to legislative requirements proposed to be disapplied and included in the DCO, as set out in Section 3.2 of the Consents and Agreements Position Statement [APP-020].	The Applicant refers to its response to Q5.0.3 above and to the Schedule of Negotiations and Powers Sought submitted at Deadline 1.
5.3	**Schedule 16 – Procedure for discharge of requirements**		
Q5.3.2	The Applicant	There appears to be little substantive difference between clauses (2) and (3) of this Art. Please explain why both are necessary.	The Applicant notes that North Yorkshire Council has identified that paragraph 2(3) of Schedule 16 (Procedure for Discharge of Requirements) is a copy and paste of paragraph 2(2) of Schedule 16. This has been corrected in the latest version of the DCO submitted at Deadline 1, in addition to any necessary consequential cross referencing amendments.
5.4	**Explanatory Note**		
Q5.4.1	The Applicant	Please update the note to include the address where the DCO can be inspected.	The Applicant has updated the latest version of the DCO submitted at Deadline 1 to identify East Riding of Yorkshire Council offices as the document inspection location. This aligns with the Hornsea Four Offshore Wind Farm Order 2023 which is also within East Riding of Yorkshire Council's locality. The Applicant has notified the council of this amendment.
6.	**Human Health**		
Q6.0.3	The Applicant	ES14.4.21. The responses to NYC during scoping (Table 14-1) and the characterisation of health (ES14.4.5 to 17) acknowledge that the assessment should consider effects on the population, including groups within it. However, the definition of effects set out in this paragraph refers to 'an area'. Please clarify the approach to the assessment of the affected population and groups within it.	It is confirmed that the Human Health assessment **[APP-066]** considers effects on the population, and groups within it. The 'area' referred to at ES14.4.21 is the geographical area, and accordingly the assessment considers the population which is living, working and visiting that geographical area.
Q6.0.4	The Applicant	ES14.4.23. Accepting the limitations of the data available, should the assessment nevertheless seek to quantify the prevalence and nature of sensitive groups within the study area population?	The prevalence and nature of sensitive groups within the study area population has been quantified as far as practicable within the baseline section of ES Chapter 14 **[APP-066]**, which for example identifies that a relatively high and growing proportion of the population is over 65. It is not possible however to quantitatively determine the sensitivity or magnitude of the population to health effects in a robust way. The IEMA guidance 'Determining Significance for Human Health in Environmental Impact Assessment' published in November 2022 which the methodology within ES Chapter 14 [**APP-066**] is in accordance with acknowledges that the significance framework for health is qualitative. Similarly, the sensitivity and magnitude criteria within that guidance (which are replicated within ES Table 14-3 and 14-4 **[APP-066]**) comprise qualitative descriptions rather than quantitative thresholds albeit the assessment can be informed by both quantitative and qualitative inputs.
Q6.0.5	The Applicant	ES Table 14-4. Please comment on the characterisation of the health impact magnitude criteria having regard to the definition of human health as including well-being, not just the absence of illness (ES14.415).	The health impact magnitude criteria within Table 14-4 **[APP-066]** are considered to satisfactorily reflect the definition of human health as including well-being, not just the absence of illness. The criteria refer to both mortality and changes in morbidity, as well as to changes in quality of life. Both the health impact magnitude criteria within ES Table 14-4 **[APP-066]** and the definition of human

ExQ1	Respondent	Question	Applicant's Response
			health at ES paragraph 14.4.15 **[APP-066]** are taken from the IEMA guidance 'Determining Significance for Human Health in Environmental Impact Assessment' published in November 2022.
Q6.0.6	The Applicant	ES14.7.9. Please provide further justification for the finding of a very low magnitude of healthcare service impact having regard to the definitions at ES Table 14-4 and your response to ExQ6.0.4.	The finding of very low magnitude of impact relates to a worst case scenario whereby 196 construction workers register at Bubwith surgery. This translates into 65 extra patients for each of the three GPs at Bubwith surgery. As noted at 14.5.28 **[APP-066]**, the target patient list of the Royal College of GPs is 1,800 patients per GP. The additional demand from construction workers would result in 1,825 patients per GP at Bubwith surgery. In this context, the finding of a very low magnitude of impact is justifiable, given that Table 14-4 **[APP-066]** indicates that an impact is very low magnitude when it 'affects very few people', 'predominantly relates to a minor change in quality of life', and 'can be immediately reversed once the activity is completed'.
Q6.0.7	The Applicant	ES14.7.14. Please review the findings in this paragraph having regard to your responses to ExQ6.0.4 and ExQ6.0.6.	As per the Applicant's response to ExQ6.0.6, the Applicant considers the finding of very low magnitude of impact on healthcare services to be justified. It is therefore considered the findings at ES14.7.14 (minor adverse effect on healthcare services for both the general population and for more vulnerable sub-populations including over 65s) **[APP-066]** to remain accurate. As per the Applicant's response to ExQ6.0.4, the IEMA guidance 'Determining Significance for Human Health in Environmental Impact Assessment' published in November 2022 has been followed in order to determine impact magnitude. It is not possible to meaningfully or robustly quantify the magnitude of health care service impact in this instance, and the IEMA guidance confirms that this is an acceptable approach.
Q6.0.8	The Applicant	ES14.7.111 to ES14.7.115. No assessment is made of the effect of the change in landscape character as a result of the proposal. Given the widespread concern in RRs regarding this effect of the proposal (commonly expressed as the 'industrialisation' of the landscape) and the widely recognised value placed on having a connection to green space, please comment on the effect of this change to the landscape on the mental health and well-being of the local population.	Landscape is not identified as a health determinant within the guidance which was drawn upon to scope and undertake the human health assessment (namely the NHS England's Healthy Urban Development Unit's (HUDU) Rapid Health Impact Assessment (HIA) Toolkit 2019, and IEMA's 'Determining Significance for Human Health in Environmental Impact Assessment' published in November 2022). As noted in 14.4.6, neighbourhood amenity has been scoped into the human health assessment in reflection of the HUDU guidance, and accordingly the human health assessment refers to the visual amenity assessment contained in ES Chapter 10: Landscape and Visual Amenity Assessment [**AS-014**]. The likely effect during both the construction and the operation phase of the Scheme is assessed to be minor adverse which is considered to be not significant.
Q6.0.9	The Applicant	Please respond to the concern expressed in a number of RRs that the proposed security lighting and CCTV cameras would lead to a loss of privacy for nearby residential occupiers.	One of the Scheme's design objectives is to ensure the design responds sensitively to residential properties in proximity to the Scheme regarding visual impact, noise, and lighting. As discussed in ES Chapter 2: The Scheme **[APP-054]** and the Design and Access Statement **[APP-234]** the Scheme is not proposing any visible lighting from CCTV or artificial lighting for security purposes during operation. The CCTV will use thermal imaging and Infrared (IR) lighting to provide night vision functionality. This is secured in the Outline Design Principles Statement **[APP-235].** 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, which will not capture publicly accessible areas or any residential curtilages and thereby not resulting in a loss of privacy for any nearby residential occupiers.

ExQ1	Respondent	Question	Applicant's Response
7.	**Historic Environment**		
Q7.0.1	The Applicant	ES7.4.6 (a) Does the reference to grassland in this paragraph include areas to be used for solar PV panels? (b) If so, how has the effect of the mounting structure driven poles (3.0-5.0 m deep (ES Table 2-1)), fencing and any below ground cabling been taken into account?	The reference to grassland in paragraph 7.4.6 of the ES [**APP-059**] refers specifically to areas of the Scheme identified for ecological mitigation. These areas will not house Solar PV panels and will therefore not be impacted by the construction or decommissioning of the Scheme.
Q7.0.2	The Applicant	Please address the concerns raised by Historic England (HE) [RR-146] with regard to (a) the level of detail of archaeological assets presented in the assessment; (b) the potential research themes identified and their contribution to mitigation; (c) whether the sense of 'experience' is adequately covered in the assessment of the significance of places; and (d) the cumulative landscape change impact of the scheme with other solar farm proposals in the area.	These concerns have been addressed in subsequent meetings with Historic England (HE) and agreement on all concerns has been reached between HE and the Applicant. A summary of the agreement is provided below and is documented in the Statement of Common Ground with HE **[EN010143/APP/8.9]**: (a) The Applicant confirmed in the written response to HE's Relevant Representation **[RR-146]** that further detail (assessment and analysis) of known and potential archaeological assets is provided in the Cultural Heritage Desk-based Assessment **[APP-080]**, the Geophysical Survey Report **[APP-081]** and Archaeological Trial Trench Evaluation Report **[APP-082]**. For completeness, it has been agreed with HE in a meeting dated 04 June 2024 that a summary of the archaeological potential for all chronological periods, including the post-medieval and modern periods referenced in HE's RR-146, will be added to the Overarching Written Scheme of Investigation (OWSI), which has been agreed with the Local Planning Authorities Archaeology Advisors and the HE Science Advisor, and has been submitted at Deadline 1 of the Examination **[EN010143/APP/8.23]**. (b) Updated research themes have been agreed with the Local Planning Authorities' Archaeology Advisors and the HE Science Advisor, and these are detailed in Section 4 of the agreed OWSI, which has been submitted at Deadline 1 of the Examination **[EN010143/APP/8.23]**. (c) This issue was closed out following agreement with HE that the Applicant would undertake additional thematic assessment in accordance with the published HE guidance on the Setting of Heritage Assets The assessment, in section 4.3 and section 5 of the Cultural Heritage Desk-based Assessment **[APP-080]** has been accepted by HE and articulates the experience of individual heritage places and assets and describes how this experience contributes to their heritage significance. (d) HE agreed during a meeting dated 04 June 2024 that the cumulative assessment in the ES was adequate, as it was recognised by HE that the area of potential impact to be further investigated related to the magnitude of change to the landscape, and specifically the effect of incremental solar development on elements of the historic landscape. It was agreed that this did not fall within the scope of cumulative assessment and investigation to assess this specific issue was required. This agreement is documented in the draft SoCG (Ref. 3.1.7 of Table 3.1 and Ref. 3.3.1 of Table 3-3) **[EN010143/APP/8.9].**
Q7.0.4	The Applicant	ES7.4.27 recognises that effects may be temporary or reversible. However, these considerations are not reflected in the criteria in ES Table 7-5. (a) Should Table 7-5 be amended to deal with temporary effects? ES7.7.35 finds that the effect of the construction	The methodology in Chapter 7 of the ES **[APP-059]** has been agreed through formal EIA scoping and engagement the Applicant has had with heritage consultees. The temporary nature of an impact, and how this influences the significance of effect on a heritage asset, is discussed, where relevant, in Section 7.7 of the ES **[APP-059]**, and the differences between temporary and permanent effects are referenced in paragraphs 7.7.2 to 7.7.5. The extent to which the temporary nature of an impact may or may not influence the significance of effect

ExQ1	Respondent	Question	Applicant's Response
		compound on the setting of Wressle Castle would be very low due to its temporary duration. (b) Please comment on whether this assessment should cover temporary effects separately.	depends on the level of change to the heritage value of an asset, including components of its setting that contribute to its value. The criteria in Table 7-5 of the ES are applied taking into account whether impacts are temporary or permanent in determining the magnitude of change. The example of Wressle Castle illustrates how the temporary duration of change to setting is taken into account with the significance of effect articulated through the descriptive narrative. This is the approach taken throughout Section 7.7 of the ES. The approach to temporary effects is therefore consistent with the methodology agreed through scoping with statutory consultees. No changes to Table 7-5 are required and the Applicant considers that there is no need to consider temporary effects separately.
Q7.0.5	The Applicant	ES7.6.6. How does the assessment of the construction of the solar PV infrastructure take into account potential compaction of the archaeology?	The potential for impacts on below ground archaeological remains due to vehicle movements within the Order limits is referenced in section 7.6.6 of the ES **[APP-059]** which confirms that potential impacts would be no greater than those assessed for construction of the Solar PV site. Assessment of construction impacts of the Solar PV infrastructure assumes that construction of all of the Scheme components could result in either physical disturbance or removal of buried archaeological assets (refer to section 7.7.3 of the ES). Physical disturbance would include impacts arising from compaction as this would comprise a change to the existing ground surface. Areas of archaeological interest have been identified from geophysical survey and trial trenching and agreed mitigation proposals, to compensate for construction impacts, are detailed in the Overarching Written Scheme of Investigation (OWSI), which has been agreed with the Local Planning Authorities' Archaeology Advisors and the HE Science Advisor, and has been submitted at Deadline 1 of the Examination **[EN010143/APP/8.23].**
Q7.0.6	The Applicant	ES7.6.7 deals with the effects on two of the five temporary construction compounds. Please set out the effects on the other three compounds.	The remaining compounds are located within the Grid Connection Corridor. Construction of the compounds in these areas may result in the permanent removal of buried archaeological remains. This impact is therefore the same as the assessment of laying of cables within the Grid Connection Corridor and would likely result in a moderate adverse or major adverse effect, which is significant. The Grid Connection Corridor has not yet been subject to trial trench evaluation, and it has been agreed with the Local Planning Authority's Archaeology Advisor that trial trenching and mitigation, if needed, in the form of a programme of archaeological excavation and recording will be carried out. The successful implementation of the agreed mitigation would result in a residual effect that is not significant. This is detailed in the agreed Overarching Written Scheme of Investigation which will be submitted at Deadline 1. For completeness and clarity, Chapter 7 of the ES **[APP-059]** will be updated with a separate impact assessment for the temporary construction compounds (rather than as part of the assessment of laying of cables within the Grid Connection Corridor) for submission at Deadline 2.
Q7.0.7	The Applicant	ES7.7.9 refers to '18 records within the Order Limits that are on the HER.' ES Appendix 7-2 paragraph 4.5.5 states that there are' 52 records in the HER that are located wholly or partially within the Site.' Please explain the difference between these figures and their characterisations in the respective subsequent paragraphs.	The number of heritage assets referenced In Chapter 7 of the ES **[APP-059]** is the correct number. The greater number of assets referenced in Appendix 7-2, Cultural Heritage Desk-Based Assessment (DBA) **[APP-080]** represents the individual record entries on the Historic Environment Record (HER). Section 4.5.5 of the DBA refers to duplicate record entries for the same heritage asset, including extensive ridge and furrow historic landscape features. These assets were grouped for the ES to avoid duplication of impact assessment for the same asset. Furthermore, changes to the Order limits subsequent to the compilation of the DBA, specifically the reduction of Solar PV Areas 2g and 3c, resulted in fewer HER assets within the Solar PV Site.

ExQ1	Respondent	Question	Applicant's Response
Q7.0.8	The Applicant	ES7.7.19. Please explain why the setting of the medieval moated site east of Gribthorpe (MHU3206) makes only a limited contribution to its significance.	The moated site east of Gribthorpe (MHU3206) survives as a denuded earthwork and buried remains and its immediate setting comprises the agricultural fields in which it is located. The fields, whilst providing a visual aspect that is sympathetic to the asset's history, are not contemporary with the asset, and are not therefore an important component of its setting that contributes to its appreciation and heritage value. The contribution of setting to the asset's value is therefore assessed to be limited.
Q7.0.9	The Applicant	ES7.7.24 to 28 identify a number of significant effects on archaeological interests. What consideration has been given to amending the scheme to avoid or reduce these effects?	As stated in ES section 7.6.1 **[APP-059]**, where practicable, mitigation measures have been incorporated into the Scheme design. Potential impacts have been predicted and opportunities to mitigate them identified with the aim of preventing or reducing impacts as much as possible. Physical impacts to known heritage assets within the Order limits have been avoided by the Scheme design, where practicable (ES 7.6.2). This embedded mitigation/mitigation by design approach has been taken into account in the assessment of effects in ES section 7.7. Where embedded mitigation to prevent or reduce impacts is not practicable, additional mitigation measures are proposed to reduce or mitigate the effects on cultural heritage assets as a result of the construction of the Scheme (refer to ES section 7.8). Potential direct impacts on buried archaeological remains will be managed through a programme of additional mitigation, as set out in the agreed Overarching Written Scheme of Investigation (OWSI) which has been submitted at Deadline1 of the Examination. The successful implementation of the programme of archaeological mitigation works detailed in the agreed OWSI would compensate for the loss of archaeological value by preserving the assets by record. The residual effect would be not significant (refer to ES Table 7-10).
Q7.0.10	The Applicant	ES7.7.44. Please expand on the considerations leading to the choice of Johnson's Farm as the operation and maintenance hub in light of the identified significant effect on this heritage asset.	The design principles which guided the Scheme design from the start in 2022 (explained in Table 3-3 of ES Chapter 3: Alternatives and Design Evolution **[APP-055]** and section 4 of the Design and Access Statement **[APP-234]**) included minimising the requirements for new built structures and therefore protecting landscape and visual amenity by making a commitment to reuse existing buildings. The reuse of the modern agricultural barns, a single storey brick barn and the derelict dwelling (farmhouse) which is within Solar PV Area 1e, known as Johnson's Farm, for an operations and maintenance hub was therefore proposed by the Applicant to avoid requiring new built structures and reuse land which is previously developed, including the existing hardstanding and access track. Other factors included existing utility services being available at this location. Following a site inspection by the Applicant in September 2023 it was found that although the modern barns could still be used for storage the farmhouse and single storey brick barn were not considered to be in a suitable condition to be able reuse and therefore demolition would be required. The buildings that would be demolished to construct the operation and maintenance hub comprise a non-designated farmhouse and single storey brick barn. Both buildings are in a ruinous condition and their heritage value is assessed as low in the ES [**APP-059**]. The significant effect arising from the demolition will be mitigated by a programme of historic building recording which has been agreed with the Archaeology Advisor to the Local Planning Authority, and which is detailed in the Overarching Written Scheme of Investigation which will be submitted at Deadline 1. The successful completion of the agreed mitigation would compensate for the loss of the buildings, resulting in a minor adverse residual effect which is not significant.

ExQ1	Respondent	Question	Applicant's Response
Q7.0.11	The Applicant	ES7.75. Please comment on any flexibility to alter the routing of the GCC to avoid the potential effect on the non-designated moat site at Hagthorpe.	As set out in the agreed OWSI **[EN010143/APP/8.23]**, the spatial extent of remains associated with a potential non-designated moated site at Hagthorpe will be confirmed by a programme of trial trench evaluation. Once the spatial extent and heritage significance of the asset, if present, is confirmed, avoidance by design measures such as the use of trenchless technologies, will be considered. If avoidance measures are not feasible, then a programme of mitigation comprising detailed archaeological excavation will be carried out in line with the agreed OWSI. This has been agreed with the Archaeology Advisor for North Yorkshire Council and is set out in section 5.1.25 of the OWSI which has been submitted at Deadline 1 of the Examination. The successful implementation of the programme of archaeological mitigation works detailed in the agreed OWSI would compensate for the loss of archaeological value by preserving the assets by record. The residual effect would be not significant (refer to ES Table 7-10).
Q7.0.12	The Applicant	ES7.7.49 states that the impact of solar PV area 2a on the Outgang drove road would be low on the basis that it would only affect the route at a particular point. The extent of the road is not clear from ES Figure 7-2 and therefore it is difficult to establish how much of the route would be affected by the scheme. Please clarify the extent of the route and the proportion that would be affected.	The Outgang is marked on Figure 7-2 by the footpath which extends east from Clay Lane in the centre of Breighton and passes through the centre of Solar PV Area 2a. The route of The Outgang was walked as part of the site survey detailed in Section 4.3 of the DBA [**APP-080**] and is appreciable as a historic route for approximately 2.1 km. The maximum width of the Interconnecting Cable Corridor trench which would be cut across The Outgang would be 2.0 m (this is secured in Outline Design Principles Statement **[APP-235]**, which represents an impact of less than 0.1% of the asset.
Q7.0.13	The Applicant	ES7.8.3. Please provide an update on progress in preparing the Overarching Written Scheme of Investigation, including consultation with HE and the relevant LPAs.	The Overarching Written Scheme of Investigation has been agreed with the Local Authorities' Archaeology Officers and Historic England and has been submitted at Deadline 1 of the Examination [**EN010143/APP/8.23].**
8.	**Land Use and Soils**		
Q8.0.1	The Applicant and NE	The proposed approach to the soil and Agricultural Land Classification (ALC) surveys of the interconnecting cable corridor land is set out in the Applicant's response to NE of 9 May 2023 (ES Appendix 15-3 [APP-118]). (a) Applicant Please confirm why this approach was not included in the survey programme for the Solar PV Site (it is not explained in the ES whether there were access difficulties). (b) NE Please comment on the Applicant's approach to the soil and ALC surveys.	Field surveyors had access to the Solar PV Site only and therefore the Predictive ALC and national soils map data were used to provide the baseline for the Interconnecting Cable Corridors. The Interconnecting Cable Corridors will be surveyed at the same time as the Grid Connection Corridor, post consent with surveys targeted to agricultural land within the corridor working widths (i.e. land which will be subject to disturbance by the Scheme). Disturbance to soils within the interconnecting cable corridors is temporary and good practice soil management measures, contained within the Framework Soil Management Plan **[APP-241]**, will maintain soil quality and allow the land to be reinstated to its current ALC grade. Pre-construction soil surveys will accurately define ALC grading in the cable corridor working widths and provide detailed soils information to further inform the detailed (construction issue) Soil Management Plan.
Q8.0.2	The Applicant	ES Table 15-1 page 15-14. Scoping in the ALC survey of the GCC as suggested by NE would allow its results to better inform the detailed routeing to minimise use of BMV land. Please comment.	Predictive ALC data was used to provide baseline ALC information for the GCC, these data were specifically commissioned for the Scheme (from Cranfield University) as they are more detailed than the Provisional ALC, providing geographic distribution of Subgrade 3a (BMV) and Subgrade 3b (non-BMV) land, albeit not to the field scale. The use of a desk based approach to baseline data gathering for linear developments is common practice and has been employed on other recent projects locally such as Viking Carbon Capture and Storage (CCS) Pipeline and Eastern Green Link 2. It is also noted that given the extent of BMV land within the GCC and the wider area, particularly to the south of the corridor, temporary disturbance of some BMV land cannot be avoided. Although it is therefore acknowledged that there will be some temporary disturbance of

ExQ1	Respondent	Question	Applicant's Response
			BMV land within the GCC, the good practice soil management measures, contained within the Framework Soil Management Plan **[APP-241]**, will maintain soil quality (maintaining structure, function and biological activity) and allow the land to be reinstated to its current ALC grade (the detailed / construction issue Plan being informed by pre-construction soil and ALC survey data). Land will be returned to landowners upon reinstatement. As set out in the Framework Soil Management Plan **[APP-241]**, the quality of the reinstatement will be verified by the Land Officer (or similar) and post-restoration surveys will be undertaken to determine whether target soil profile specifications have been met. Comparison of the pre and post construction surveys will verify that the land has been restored to the required standard. In the unlikely event that there are issues with the restoration, this approach will ensure that any issues are identified and rectified early after construction. Therefore, although BMV land will be encountered, disturbance will be temporary and the land reinstated to its pre-development condition.
Q8.0.3	The Applicant	ES15.4.2. Please expand on the effect on agricultural productivity of the proposals for the Ecological Mitigation Area.	The Ecology Mitigation Area comprises the Goose Mitigation Zone and the Golden Plover Mitigation Zone. As summarised in Table 15-12 of the ES Chapter 15: Soils and Agricultural Land **[APP-067]**, 80.8% of land within the Ecology Mitigation Area is non-BMV. The Goose Mitigation Zone will include change of husbandry to introduce over-wintered stubbles and spring crops. Yields of spring crops tend to be lower than autumn-sown crops, but no estimate has been made of changes to agricultural productivity. Neither has profitability been assessed, as spring crops tend to have lower input costs. The land within the Golden Plover Mitigation Zone (closer to the River Foulness) will be managed as wet grassland habitat. This land lies within Flood Zone 3 and is currently predominantly agricultural land (arable cropping) which is farmed at risk due to periodic flooding from the River Foulness. Current yields from this land are therefore unpredictable and lower than for the Goose Mitigation Zone which will remain in arable production throughout the lifetime of the Scheme. An assessment of the changes to agricultural productivity has not been undertaken.
Q8.0.4	The Applicant	ES15.4.8. Reference is made to the agricultural business model for grazing including the provision of 'vegetation management services' among other things. Does this mean that the solar farm operator would pay the sheep farmer to graze sheep on the land?	As grazing achieves an essential maintenance function (maintaining the grass at a low level) without the need for/cost of machinery, the grazier would be providing an essential maintenance service. The grazier would therefore either be paid for the provision of this service or would be allowed to graze the land at a low rent or free of charge. The commercial arrangements between the operator and a grazier are yet to be determined and in part depend upon market forces at the time. The commercial arrangements do not form part of environmental impact assessment.
Q8.0.5	The Applicant	ES Table 15-4. The negative impact magnitude criteria used all refer to permanent, irreversible loss of soil function or volumes over a range of areas. As such, they do not take into account the long term, reversible loss which the ES considers would result from the proposal (see ES15.4.10). The IEMA guidelines advise practitioners to focus on interests relevant to their specific proposals (ES15.2.28). Should the magnitude criterion be amended to take long term, reversible loss into account? If so, please update your findings accordingly	The methodology and criteria used within the ES follow Institute of Environmental Management and Assessment (IEMA) Guide: A New Perspective on Land and Soil in Environmental Impact Assessment (2022) which provides the only published guidance for the consideration of the impacts of development on soils and land in EIA. The criteria do not focus on whether the development itself is temporary (short- or long-term) or permanent in nature, rather whether a given development would lead to permanent, irreversible loss of one or more soil functions or soil volumes (including permanent sealing or land quality downgrading), Noting that Table 15-4 (ES Chapter 15: Soils and Agricultural Land **[APP-067]**) specifically references that such losses can result from temporary developments.

ExQ1	Respondent	Question	Applicant's Response
			Therefore, there is no requirement to deviate from the published guidance and amend the magnitude criterion. It is noted that an element of professional judgement has been applied. For example, within the Solar PV Site soil function will be enhanced long-term by the withdrawal of cultivation as recognised in ES Table 15-24 (ES Chapter 15: Soils and Agricultural Land **[APP-067]**). This functional gain would be reversed if arable cultivations were resumed. Whilst this benefit is extensive (>20ha) and could therefore be considered a major benefit to BMV land, the magnitude of the impact has been moderated by professional judgement and recognised as 'minor to moderate'. This moderation, such that a reversible benefit is not overstated applies the principles of the IEMA guidelines to reversible change.
Q8.0.6	The Applicant	ES15.1.3 page 15-32 (note that the paragraph numbering in this section is wrong). No criteria for impact magnitude or significance are provided. Please provide this information or explain its absence.	We acknowledge and regret the error in presenting paragraph numbering that are non-sequential from the preceding section. Following the IEMA guidance for assessing soils and land in EIA, the magnitude of impact to soil resources uses the criteria presented in ES Table 15-4 (ES Chapter 15: Soils and Agricultural Land **[APP-067]**), and the significance of effect to soil resources follows ES Table 15-5 (ES Chapter 15: Soils and Agricultural Land **[APP-067]**). The titles of these tables therefore should have stated 'Table 15-4: Magnitude of impact on agricultural land and soil resources' and 'Table 15-5: Significance of effect on agricultural land and soil resources' respectively.
Q8.0.7	The Applicant	ES Figure 15-1. The key for this figure annotates ALC Post 1988 Classification with cross hatching, but the plan shows cross hatching covering a relatively small part of the study area and none within the site area. Please explain the extent of ALC Post 1988 Classification shown on the plan.	Post-1988 surveys describe discrete areas covered by detailed ALC survey data which post-date the revised ALC methodology, and as such provide accurate ALC grading at the field scale including a distinction between ALC Subgrades 3a (BMV) and 3b (non-BMV). These surveys are available on the UK Government's geographic information website (Multi-Agency Geographic Information for the Countryside – MAGIC), and their coverage is dependent upon the availability of survey data / reporting. The Provisional ALC mapping data is intended as a strategic tool and covers the whole of England, it pre-dates the revised ALC methodology (describing Grade 3 only). The Provisional ALC data are not accurate at the field scale (only reporting variations in ALC grade for areas greater than approximately 80 ha). Field survey data (for the Solar PV Site and Ecological Mitigation Area) and the Predictive ALC produced by Cranfield University were used to inform the baseline for the impact assessment presented in the ES, however prior to these data being available the Scheme referred to the published Provisional and Post-1988 datasets, for instance being used during the site selection process to direct the Scheme away from areas of BMV agricultural land and towards land with the lowest ALC grading in the area of search. Although there are no post-1988 data within the Order limits these data were presented within Figure 15-1 of the ES to provide detailed information regarding the ALC within the wider area in the vicinity of the Scheme for context.
Q8.0.9	The Applicant	ES15.5.25 and Table 15-11 state that 12.99ha of land is BMV. However, the table also indicates that there is 12.99ha of Grade 1 plus 1.97 of Grade 2 and 46.44 of Grade 3a - all of which comprise BMV land (ES15.4.32). Please explain the position and update the findings accordingly.	We acknowledge and regret the error in ES 15.5.25 and Table 15-11 (ES Chapter 15: Soils and Agricultural Land **[APP-067]**) indicating that 12.99 ha of land within the Solar PV Site is BMV, this figure relates to the area of Grade 1 agricultural land only. The correct figure is identified as the sum of the areas of Grade 1, Grade 2 and Subgrade 3a land, namely 61.4 ha. Please note that the expression of percentage BMV land within the Solar PV Site (6.3%) presented within Table 15-11 and ES 15.5.25 (ES Chapter 15: Soils and Agricultural Land **[APP-067]**) is calculated from the correct total 61.4 ha and is correctly presented as such.

ExQ1	Respondent	Question	Applicant's Response
			The correct breakdown of BMV (61.4 ha) and non-BMV land (897.59 ha) within the Solar PV Site is also correctly presented in Table 15-18 of the ES Chapter 15: Soils and Agricultural Land **[APP-067]**.
Q8.0.10	The Applicant	ES15.6.2b. Please provide further information on the locations of designated soil storage areas	The precise location of soil storage areas will not be available until detailed design, however it is expected that (in most locations) the excavated soil will be stored on the margin of the working area. The detailed Soil Management Plan to be prepared prior to construction will include the following: a. Maps showing topsoil and subsoil types, and the areas to be stripped and left in-situ. b. Methods (including machinery) for stripping, stockpiling, respreading, and ameliorating the soils. c. Maps showing locations of soil stockpiles and content (e.g. Topsoil type A, subsoil type B). d. Schedules of volumes for each material. e. Expected after-use for each soil, (whether topsoil to be used on site, used, or sold off site, or subsoil to be retained for landscape areas, used as structural fill or for topsoil manufacture). f. Identification of person responsible for supervising soil management. It is noted that in relation to point e. it is expected that all soils will be retained on site and reinstated in their area of origin; and that the soil profile will not be disturbed due to the installation of solar PV frames, as frames are driven directly into the ground without the need for foundations. The above measures have been added to the updated Framework Soil Management Plan submitted at Deadline 1 of the Examination.
Q8.0.11	The Applicant	ES15.7.8, ES15.7.11, ES15.7.21 and ES15.7.33. Please explain how the effects findings reported in these paragraphs have been assessed having regard to your response to ExQ8.0.5 (ES Table 15.4).	As set out in the response to ExQ8.0.5 the methodology and criteria used within the ES Chapter 15: Soils and Agricultural Land **[APP-067]** follow IEMA Guide: A New Perspective on Land and Soil in Environmental Impact Assessment (2022) which provides the only published guidance for the consideration of the impacts of development on soils and land in EIA. The criteria for magnitude of impacts on agricultural land set out in Table 15-4 of the ES Chapter 15: Soils and Agricultural Land **[APP-067]** do not focus on whether the development itself is temporary (short- or long-term) or permanent in nature, rather whether a given development would lead to permanent, irreversible loss of one or more soil functions or soil volumes (including permanent sealing of land or land quality downgrading) and including soil-related features identified by other topic specialists, such as ecology, flood risk and land use; and the area over which such a loss would take place. ES15.7.8 – describes areas in Solar PV Areas 1e and 2a where shallow hollows (created by means of localised redistribution of topsoil) to increase flood storage resilience are easily removed at decommissioning by using standard agricultural equipment and the land returned to agricultural use. ES15.7.11 – describes areas of hardstanding within the Solar PV Site which would be reinstated to agricultural land at the end of the operational phase using site won, stored soils. ES15.7.21 – describes land within the Golden Plover Mitigation Area which will undergo change of use from agricultural use to ecological mitigation (seeding as grassland cover and shallow blind

ExQ1	Respondent	Question	Applicant's Response

linear foot drains created by means of localised redistribution of topsoil as for the flood storage areas in ES15.7.8) which will be reversed on decommissioning.

In all three cases, there would be no permanent sealing of land, as any hardstanding, if present, would be removed at decommissioning. Furthermore, the embedded mitigation measures set out in section 15-6 of the ES Chapter 15: Soils and Agricultural Land **[APP-067]** and the measures prescribed in the Framework Soil Management Plan **[APP-241]**, Framework Construction Environmental Management Plan (CEMP) **[APP-238]** and Framework Decommissioning Environmental Management Plan (DEMP) **[APP-240]** would ensure that soils were handled, stored and reinstated in accordance with industry good practice ensuring that a permanent, irreversible loss of one or more soil functions or soil volumes would not occur. Consequently, there would be no downgrading of land quality (ALC grading) upon restoration and no restriction to the proposed land use. Referring to Table 15-4 (ES Chapter 15: Soils and Agricultural Land **[APP-067]**) and in accordance with the IEMA guidance, where no discernible loss or reduction in soil functions or soil volumes is predicted there is no requirement to consider the area of land affected when assigning magnitude of impact; and the impacts to agricultural land in these three areas was classified as negligible.

The sensitivity of agricultural land is defined by the ALC grading in accordance with Table 15-3 of the ES Chapter 15: Soils and Agricultural Land **[APP-067]**.

Therefore, following the matrix for determining the significance of effect presented in Table 15-5 (ES Chapter 15: Soils and Agricultural Land **[APP-067]**), the impacts of the above activities were assessed as slight adverse for any Grade 1, 2 and Subgrade 3a (BMV) land impacted, and neutral for any Subgrade 3b and Grade 4 (non-BMV) land impacted, the effects were therefore classed as not significant.

In accordance with the ES Chapter 5: EIA Methodology **[APP-057]**, ES Chapter 15: Soils and Agricultural Land **[APP-067]** also describes whether an effect is permanent (such as the loss of agricultural land to the development of the Grid Connection Substations) or reversible (such as the removal of land within the Golden Plover Mitigation Area from agricultural use until decommissioning) and whether the effect is reversible in the long or short-term. However, as explained previously, this duration is not considered as an assessment criteria within the assessment of effects as described above.

ES15.7.8, ES15.7.11, ES15.7.21 (ES Chapter 15: Soils and Agricultural Land **[APP-067]**) all describe effects which are long-term and reversible as the land will be returned to agricultural use at decommissioning.

ES15.7.33 describes that (following the matrix for determining the significance of effect presented in Table 15-5), due to the negligible magnitude of change the impacts to the low and medium sensitivity soils present within the Grid Connection and Interconnecting Cable Corridors during the construction phase are assessed as neutral and not significant. As described in the response to Q8.0.6, following the IEMA guidance, the magnitude of impact to soil resources uses the criteria presented in Table 15-4 of the ES Chapter 15: Soils and Agricultural Land **[APP-067]**.

As described above, the embedded mitigation measures set out in section 15.6 of the ES Chapter 15: Soils and Agricultural Land **[APP-067]** and the measures prescribed in the Framework Soil Management Plan **[APP-241]** and Framework CEMP **[APP-238]** will ensure that soils are handled, stored and reinstated in accordance with industry good practice ensuring that a permanent, irreversible loss of one or more soil functions or soil volumes would not occur and instead there

ExQ1	Respondent	Question	Applicant's Response
			would be no discernible loss or reduction in soil functions or soil volumes, and consequently no downgrading of land quality (ALC grading) upon restoration and no restriction to the proposed land use. Therefore, following Table 15-4 the magnitude of impact/change to soils within the Grid Connection and Interconnecting Cable Corridors were assessed as being negligible as stated in ES15.7.33. The sensitivity of soils is determined in relation to Table 15-6 and this is further described in the response to Q8.0.12. The soils within the Grid Connection and Interconnecting Cable Corridors will be reinstated to their previous land use after construction; and as the impacts are predicted to be neutral and not significant referring to section 5.6.2 of the ES Chapter 5: EIA Methodology **[APP-057]**, they are classified as short term (enduring for up to 12 months after construction or decommissioning) and reversible.
Q8.0.12	The Applicant	ES Table 15-6 and ES15.7.13 to 15 and ES15.7.24. The criteria for high and medium sensitivity of soil resources includes Field Capacity Days for clay soils of 150 days. The Agricultural Quality Report (ES Appendix 15-3 [APP-118]) refers to a Field Capacity Day threshold of 130 days for permeable clays and ascribes wetness classes accordingly (paragraph 2.5). Please explain this difference and its implications for your findings, including assigning a medium sensitivity to the Foggathorpe association.	ES Appendix 15-3: Soil and Agricultural Land Classification Survey Report **[APP-118]** reports the field surveys conducted within the Solar PV Site and the Ecology Mitigation Area and the calculated ALC grading. This document refers specifically to the use of climatic data and Field Capacity Days (FCD) to ascribe Wetness Class III or IV to the slowly permeable clay soils which dominate the survey area (i.e. those of the Foggathorpe association). Over 130 FCDs is assigned Wetness Class IV, whereas FCD at or below 130 FCDs are Wetness Class III (imperfectly-draining). It is noted that the FCDs for the land within the Site is between 125 and 135 days and therefore soils within Wetness Classes IV and III are present. Within Appendix 15-3 **[APP-118]** (in accordance with the standard methodology) the assigned Wetness Class is used to inform the ALC grading. The criteria classes for sensitivity of soil resources presented in Table 15-6 (ES Chapter 15: Soils and Agricultural Land **[APP-067]**) and referenced elsewhere in the document are taken from the IEMA guidance on assessing impacts to soils and land in EIA. These identify sensitivity/resilience of soils based on soil texture in conjunction with FCD and/or Wetness Class as it is recognised in the guidance that soils of high clay content in wetter climate regions are most sensitive to damage during handling, whereas the permeable nature of light sandy soils means that their natural structural recovery and drainage characteristics are more easily maintained and they are less sensitive. Consequently, as set out in Table 15-6 of the ES Chapter 15: Soils and Agricultural Land **[APP-067]**, within each sensitivity class (high, medium and low sensitivity) different qualification criteria / thresholds are applied depending upon soil texture, for example a medium sensitivity is assigned: • For soils with high clay and silt fractions (clays, silty clays, sandy clays, heavy silty clay loams and heavy clay loams) where the FCDs are 150 or fewer. • For medium-textured soils (silt loams, medium silty clay loams, medium clay loams and sandy clay loams), where the FCDs are 225 or greater. • For sandy loamy sands, sandy loams and sandy silt loams where the FCDs are 225 or greater **or** soils are in Wetness Classes III and IV. As the Foggathorpe association is comprised of clay soils, in adherence to the IEMA guidance (as outlined above), FCDs and not Wetness Class is used to determine their sensitivity, noting that the Wetness Class of these soils was reported in ES15.7.24 for completeness. As FCDs are between 125 and 135 days (i.e. fewer than 150) in accordance with Table 15-6 of the ES Chapter 15: Soils and Agricultural Land **[APP-067]** the Foggathorpe soils were consequently assigned as medium sensitivity.

ExQ1	Respondent	Question	Applicant's Response
Q8.0.13	The Applicant	ES15.7.18. Please explain how your significance findings have been assessed in the apparent absence of criteria for magnitude of impact for soil resources (see Ex8.0.6).	As set out in the response to Q8.0.6, following the IEMA guidance, the magnitude of impact to soil resources uses the criteria presented in Table 15-4 of the ES Chapter 15: Soils and Agricultural Land **[APP-067]**, and the significance of effect to soil resources follows Table 15-5 of the ES Chapter 15: Soils and Agricultural Land **[APP-067]**. The titles of these tables therefore should have stated 'Table 15-4: Magnitude of impact on agricultural land and soil resources' and 'Table 15-5: Significance of effect on agricultural land and soil resources' respectively. ES15.7.18 assesses the construction phase effects to soils of the Kexby association in the Solar PV Area. As set out in ES15.7.18, referring to Table 15-6 of the ES Chapter 15: Soils and Agricultural Land **[APP-067]**, the permeable, sandy, Wetness Class I soils of the Kexby association are classed as low sensitivity. ES15.7.14 sets out that with the embedded mitigation measures for the sustainable management of soil resources set out in section 15.6 of the ES Chapter 15: Soils and Agricultural Land **[APP-067]**, Framework CEMP **[APP-238]** and the Framework Soil Management Plan **[APP-241]** in place there would be no discernible loss or reduction of soil functions or soil volumes and so (with reference to Table 15-4 of the **[APP-238]**) the magnitude of impact would be negligible for all soils within the Solar PV Site disturbed during the construction of the Scheme. Significance of effect was then defined with reference to the matrix presented at Table 15-5 of the ES Chapter 15: Soils and Agricultural Land **[APP-067]**, resulting in the impacts to these soils being assessed as neutral, and not significant as reported in ES15.7.18.
Q8.0.14	The Applicant	EN-3(24) paragraph 2.10.34 advises that soil management proposals should be in line with the ambition set out in the Environmental Improvement Plan to bring at least 40% of England's agricultural soils into sustainable management by 2028 and increase this up to 60% by 2030. Please set out how the framework Soil Management Plan [APP-241] meets this requirement.	The Framework Soil Management Plan **[APP-241]** documents the approach to the sustainable management of soils during construction, therefore it is focussed on ensuring that construction activities do not result in irreversible losses of soil functions or soil volumes and that agricultural land is restored to its pre-development condition (ALC grade). Therefore, the Framework Soil Management Plan **[APP-241]** does not directly contribute to the ambitions of the Environmental Improvement Plan (2023), which under Goal 6: Using resources from nature sustainably (page 165) commits to *'Through our new farming schemes, bring at least 40% of England's agricultural soil into sustainable management by 2028, and increase this to 60% by 2030'* as the land is not being farmed during the construction period. It does however ensure that the quality of the land within the Site is not negatively affected by construction activities, providing the same platform for the application of sustainable farming practices / sustainable management as prior to construction. After construction land within the Grid Connection and Interconnecting Cable Corridors will be returned to the landowners and the Applicant will have no input into the future use or management of the land. As part of measures to mitigate the loss of habitat for overwintering birds (particularly Pink Footed Geese) within the Solar PV Site, as reported in the response to Q8.0.3, the land within the Goose Mitigation Zone of the Ecological Mitigation Area will undergo a change of husbandry to introduce over-wintered stubbles. This change in husbandry will be implemented in advance of construction and will remain in effect until after the solar farm has been decommissioned. As reported by Defra (B. McGregor, 2023. 'The science behind the Sustainable Farming Incentive') one of the three actions included in the UK Government's Sustainable Farming Incentive is '*adding organic matter and reducing bare ground. For example, through cover crops, tree planting on unproductive land and **overwinter stubbles'.*** This is reported as being a measure to mitigate the impact of extreme weather on crops as improved soil structure results in increased water retention and less risk of soil erosion for example during floods.

ExQ1	Respondent	Question	Applicant's Response
			The second action of the Sustainable Farming Incentive is '*to reduce biodiversity loss to increase yields'* for example by '*planting hedgerow, trees, flower habitats and wild bird food',* with the effect reported as being the *'increased provision of food and nesting resources available to wildlife. For example, beneficial insects that support farming through pollination and pest control, and birds, which are an indicator of wider environmental quality'.* As set out in the Framework Landscape and Environmental Management Plan (LEMP) **[APP-246]**, the Scheme includes (but is not limited to) the planting of trees (including woodland and orchard planting), new lengths of hedgerow and hedgerows with trees as well as the enhancement of existing hedgerows, and scrub planting. The predominantly arable land in areas which will be covered by solar PV panels will be sown to semi-improved grassland, whilst species rich grassland will be created around field edges, in areas of habitat enhancement outside panel/infrastructure areas and in the Golden Plover Mitigation Zone, smaller areas of flower-rich grassland will also be created. These habitats will remain in place until at least decommissioning. The final action of the Sustainable Farming Incentive is to '*reduce the impact of rising costs by improving soil health*' through the addition of organic matter, for example, '*through cover crops, legume mixes and incorporation of straw into soil'*. Whilst not technically a cover crop, the change from predominantly arable farming practice to grassland cover within the Solar PV Site and Golden Plover Mitigation Zone would contain legumes (such as clovers) and be beneficial to the structure of soils as permanent vegetation cover would protect the soil from wind erosion when dry; from erosion due to surface water runoff during wet periods, and damage from trafficking. Improved soil structure also improves the movement of water and gases in and out of the soil making improving conditions for plant growth. Importantly soil organic carbon content can become depleted as a result of regular intensive cultivation such as occurs over the majority of the Solar PV Site at present. Research published by the British Society of Soil Science (BSSS) states that the greatest and most rapid soil carbon gains can be achieved through land use change, e.g. conversion from arable land to grassland or woodland such as will occur due to the Scheme. It is noted that this carbon gain is however reversible upon return to arable agriculture at decommissioning. Grazing is the Applicant's preferred method of vegetation management within the Solar PV Site and this would also add organic matter to the soil through the deposition of dung. In conclusion, the Scheme will contribute to the ambitions of the Environmental Improvement Plan with respect to bringing agricultural soils into sustainable management, by delivering all three actions of the UK Government's Sustainable Farming Incentive during its operational lifetime. However, as explained, these will not be delivered through the Framework Soil Management Plan **[APP-241]**.
Q8.0.15	The Applicant	Please provide further information on what would happen to the field stations foundations and below ground poles for the solar PV tables when the site is decommissioned.	The poles of the PV Mounting Structures are typically made of galvanised steel and are directly driven into the ground without the need for foundations. At decommissioning the poles will be pulled up and reused or recycled along with the rest of the mounting structures. The foundation types to be used within the field stations will be determined at detailed design, but are typically concrete foundations (blocks or plinths), although other types of foundations (e.g., ground screws, reinforced concrete piles, or compacted stone/gravel) may be used depending on the local geology or land quality. At decommissioning the foundations will be removed and will be reused or recycled as far as is practicable at the time, with other recovery methods being investigated where this is not possible (with disposal being the last option, as per the waste hierarchy).

ExQ1	Respondent	Question	Applicant's Response
			Current recovery rates for key construction materials and other construction wastes relevant to the Scheme are provided in Table 16-25 of the ES Chapter 16: Other Environmental Topics **[AS-016]**. Currently, metals typically achieve 95 to 100 % recovery and concrete typically achieves 75 to 100 % recovery.
Q8.0.16	The Applicant	Please respond to the widespread concern expressed in RRs that the scale of the proposal would change the land use character of the area from predominantly agricultural to industrial.	Chapter 10: Landscape and Visual Amenity **[AS-014]** presents the findings of an assessment of the likely significant effects on Landscape and Visual Amenity as a result of the Scheme. 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. Landscape character is made up of a number elements as set out in section 5.4 of Guidelines for Landscape and Visual Impact Assessment (GLVIA3), and not all those elements are being removed or changed as a result of the Scheme. 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. The Scheme will result in the introduction of incongruous, industrial features that would change the overall landscape character which will result in adverse landscape effects that will reduce over the period of its operation and will be reversible. Land use would change from agricultural fields to areas of Solar PV Panels. Key landscape characteristics which contribute to landscape character including hedgerows, hedgerow trees and longer distance views would be retained, where possible. As reported in the ES Chapter 15: Soils and Agricultural Land **[APP-067]**, there is a slight beneficial (non-significant) effect associated with the conversion of arable to grassland during the operational stage, which has potential to accrue improvement to soil structure and function over a major area during the Scheme's operation. The decommissioning phase will return the Order limits to the landowner, available for agricultural use. As such, it is noted that an element of professional judgement has been applied. For example, within the Solar PV Site soil function will be enhanced long-term by the withdrawal of cultivation as recognised in ES Table 15-24 (ES Chapter 15: Soils and Agricultural Land **[APP-067]**). This functional gain would be reversed if arable cultivations were resumed. Whilst this benefit is extensive (>20ha) and could therefore be considered a major benefit to BMV land, the magnitude of the impact has been moderated by professional judgement and recognised as 'minor to moderate'. This moderation, such that a reversible benefit is not overstated applies the principles of the IEMA guidelines to reversible change.
9.	**Landscape and Visual**		
Q9.0.5	The Applicant	ES10.4.3. (a) Please expand on the methodology used to assess views from residential locations. (b) How have the concerns of neighbouring occupiers (expressed in pre-application consultation and in a number of RRs) been taken into account?	The assessment of views from individual residential locations has not been undertaken within Chapter 10: Landscape and Visual Amenity **[AS-014]** as per guidance within Guidelines for Landscape and Visual Impact Assessment (GLVIA3). Where a number of residential properties are located in close proximity they have been assessed using a representative viewpoint that is located close to those properties, or has been located to provide a similar extent of visibility that would be available from the residential properties.

ExQ1	Respondent	Question	Applicant's Response
			The Scheme design is the result of an iterative design process which delivers the Scheme's functionality, the generation of 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 **[APP-234]** 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.
Q9.0.6	The Applicant	ES10.4.15. The Zones of Theoretical Visibility (ZTV) (ES Figure 10.5) includes fairly large areas to the west of the application site (north of Hemingborough) and east (towards Newport) which are omitted from the study area. Please expand on the reasons for omitting these areas.	Section 10.4.13 to 10.4.19 in Chapter 10: Landscape and Visual Amenity **[AS-014]** outlines the extent of the Study Area for the purposes of the Landscape and Visual Impact Assessment. It states that the Study Area is determined by the potential visibility of the Scheme in the surrounding landscape and is proportionate to the size and scale of the Scheme and nature of the surrounding landscape. The Study Area has been defined by a combination of ZTV analysis and professional judgement, and verified in the field. The ZTV (ES Figure 10-5 **[APP-160]**) illustrates theoretical visibility to the west outside of the identified Study Area which was discounted from assessment as a result of on site verification where localised vegetation and landform results in no views of the Solar PV Areas from these locations.
Q9.0.7	The Applicant	ES10.4.37. (a) Please expand on how the advice in Technical Guidance Note 2/19: 'Residential Visual Amenity Assessment' regarding significant effects prior to year 15 has been applied to the proposal. (b) Should such effects trigger the need for a Residential Visual Amenity Assessment?	a) As set out in paragraph 10.4.36 of the ES Chapter 10: Landscape and Visual Amenity **[AS-014]**) the TGN 2/19 Residential Visual Amenity Assessment (RVAA) was reviewed for long term impacts to visual amenity receptors to take into consideration the effects of mitigation. Identified significant effects during the construction phase and Year 1 of operation as a result of the nature of the Scheme and were not considered by the Applicant to trigger the need for a RVAA due to the temporary and short term nature of the identified effects. b) The advice within TGN 2/19 Residential Visual Amenity Assessment (RVAA) states "*Landscape and Visual Impact Assessment findings of significant (adverse) effects on outlook and /or on visual amenity at a residential property do not automatically imply the need for a RVAA. However, for properties in (relatively) close proximity to a development proposal, and which experience a high magnitude of visual change, a RVAA may be appropriate, and may be required by the determining / competent authority. The scope of a RVAA is normally agreed with the determining / competent authority*". The Applicant considers that the identified significant adverse effects during the construction and Year 1 of operation explained in ES Chapter 10: Landscape and Visual Amenity **[AS-014]** and discussed in (a) above, do not trigger the need for a RVAA and the Applicant's ongoing engagement with East Riding of Yorkshire Council during the pre application stage and in their response to the statutory consultation did not identify that a RVAA should be prepared.
Q9.0.8	The Applicant	ES Figure 10-8. (a) It would be helpful to include on the plan the direction of each viewpoint. (b) Please check the direction of view stated on the viewpoint photography. For example, Figure	ES Figure 10-8: Representative Viewpoint Locations **[APP-163]** shows the location of each viewpoint. Figure 10-8 has been updated (and submitted at Deadline 1 of the Examination) to illustrate the direction of view to correspond with Viewpoint Photography (Figure 10-9 through to

ExQ1	Respondent	Question	Applicant's Response
		10-31 VP22 states that the direction of view is east, whereas the photograph appears to show the view to the north (including the distinctive church spire at Hemingborough). ES Figure 10-36 VP27 states that the direction of view is north, whereas the photograph appears to show the view to the west.	Figure 10-38 **[APP-164 to APP-193]** and Figure 10-39 through to Figure 10-55 Photomontages **[APP-194 to APP-210]**. It is acknowledged that there are some errors in the stated direction of view as indicated. The following figures have been updated for errors in the direction of view stated: • Fig 10-31 Viewpoint Photography VP22; and • Fig 10-36 Viewpoint Photography VP27. The direction of view has been updated in the following figures for consistency: • Fig 10-10 Viewpoint Photography VP02; • Fig 10-11 Viewpoint Photography VP03; • Fig 10-12 Viewpoint Photography VP04; • Fig 10-14 Viewpoint Photography VP06; • Fig 10-15 Viewpoint Photography VP07; • Fig 10-21 Viewpoint Photography VP12a; • Fig 10-25 Viewpoint Photography VP016; • Fig 10-27 Viewpoint Photography VP18; • Fig 10-34 Viewpoint Photography VP25; • Fig 10-35 Viewpoint Photography VP26; and • Fig 10-37 Viewpoint Photography VP08. The direction of view has been updated in the following figures for consistency: • Fig 10-42 Photomontage VP05; • Fig 10-45 Photomontage VP09: • Fig 10-46 Photomontage VP10a; • Fig 10-53 Photomontage VP19; and • Fig 10-54 Photomontage VP25. The photograph was updated in the following figure to correspond with the photomontage location: • Fig 10-21 Viewpoint Photography VP12a. All Viewpoint Photography and Photomontage Figures as outlined above have been updated and submitted at Deadline 1. View direction information has also been added for each viewpoint in Table 10-12 of the updated ES Chapter 10: Landscape and Visual Amenity submitted at Deadline 1.
Q9.0.9	The Applicant	ES10.6.16 refers to grassland habitats being used to create a corridor connecting Gribthorpe and Willitoft. While an ecological enhancement area appears to perform this function through Area 1b (although it is bisected by land outside the Order	ES Figure 2-3 Indicative Site Layout (Sheet 1 of 7) **[APP-138]** illustrates the proposed landscape treatment to Solar PV Area 1a. The Proposed Ecological Enhancement Area within Solar PV Area 1b is connected to existing habitat corridors to the east of Willitoft (areas of existing woodland and hedgerows) with a 40 m wide swathe of Proposed Species-Rich Grassland along the Howden 20

ExQ1	Respondent	Question	Applicant's Response
		Limits), it is not clear from ES Figure 2-3 how this would be achieved across Area 1a. Please clarify how this corridor would be achieved.	Circular Route (PRoW), as described within paragraph 10.6.8d of the ES Chapter 10: Landscape and Visual Amenity **[AS-014]**. The habitats are also connected with Proposed Hedgerows with Trees and Proposed Enhanced Hedgerow along the western boundary as illustrated on ES Figure 2-3 **[APP-138]** and the Framework Landscape Masterplan (Appendix A of the Framework LEMP **[APP-246]**). The Framework LEMP **[APP-246]** is secured through Requirement 6 of the Draft DCO **[AS-008]**.
Q9.0.10	The Applicant	ES Table 10-9 pages 10-66 to 67 (a)The characterisation of the Humberhead Levels (NCA39) is a flat, low-lying and large scale agricultural landscape, with widespread evidence of drainage history, long unbroken views and many areas of international ecological and historical importance (ES Appendix 10-3 Table 1 [APP-100]) Notwithstanding the presence of existing energy infrastructure, please provide further justification for finding that the NCA has a low susceptibility to the proposal and that there would be little perceptible change to the key landscape characteristics. (b) Construction and operation phase effects. Please provide clarification of the description of the loss of arable farmland as 'small scale', having regard to the size of the site (1276ha), most of which is in agricultural use, and the consequential finding of a very low impact over a small geographical extent.	As stated in Chapter 10: Landscape and Visual Amenity **[AS-014]** the NCA39 covers an extensive area a) The assessment of impacts and effects as a result of the Scheme has been undertaken for the full extent of NCA39, not the extent of NCA39 that lies within the Study Area. y. The landscape of NCA39 is generally simple, monotonous with some degraded features and overall minimal variation in landscape pattern. It is assessed that NCA39 would have a low susceptibility to accommodate the Scheme. Refer to Table 10-3 in Chapter 10: Landscape and Visual Amenity **[AS-014]**. The presence of ecological and historical importance is taken into consideration in the assessment of value, which has been identified as medium within Table 10-9 within Chapter 10: Landscape and Visual Amenity **[AS-014]**. The assessment within Table 10-9 in Chapter 10: Landscape and Visual Amenity **[AS-014]**. was informed by the flat, generally simple landscape that could accommodate a solar development without impacting on the historic and biodiversity conservation sites, the extensive unbroken views that are present across the NCA and that the Scheme would not introduce additional tall vertical forms within the landscape. b) There would be 'small scale' changes over a small geographic extent in comparison to the full geographic extent of NCA39 which covers 1,718 square kilometres (171,800 hectares) as per the data available from Multi-Agency Geographic Information for the Countryside (MAGIC).
Q9.0.11	The Applicant	ES Table 10-10. No assessment appears to be provided for Open Farmland (LCT5) or Foulness Open Farmland (LCT7) despite the solar PV panels being located within these areas (ES Figure 10- 3). Please explain this omission or provide an assessment.	Sections 10.5.26 and 10.5.27 in the ES Chapter 10: Landscape and Visual Amenity **[AS-014]** provide an overview of the key characteristics for LCT5 and LCT7. Within the East Riding of Yorkshire Landscape Character Assessment the Landscape Character Types (LCTs) are subdivided into Landscape Character Areas (LCAs). The landscape assessment has been undertaken on a local level using the subdivided LCAs which are LCA 5A and LCA 5B within LCT 5 and LCA 7A and LCA 7B within LCT 7. The assessment is provided in Table 10-11: Assessment of landscape effects – Local (the ES Chapter 10: Landscape and Visual Amenity **[AS-014]**).
Q9.0.12	The Applicant	ES Table 10-11. Howden to Bubwith Farmland (LCA5A) West of Holme on Spalding Moor Farmland (LCA5B), South of Holme on Spalding Moor Farmland (LCA7A) and Eastrington Farmland (LCA7B). (a) These areas have many of the characteristics of the Humberhead Levels (NCA39). Having regard to the matters referred to in ExQ9.0.10, please provide further justification for finding that they would have a low susceptibility to the proposal.	a) As a result of the presence of existing energy infrastructure, overhead power lines and flat, low lying landscape, it is assessed that the ability of LCA5A, LCA5B, LCA7A and LCA7B to accommodate the Scheme would be high, resulting in a low susceptibility. b) The assessment within the ES Chapter 10: Landscape and Visual Amenity **[AS-014]** has been carried out based on the extent of the Scheme within LCA7B covers less geographical area than within LCA5B and is concentrated over a smaller area within LCA7B. The Scheme within LCA5B is spread over a greater geographical extent and would have direct and indirect impacts over a larger area in comparison to LCA7B.

ExQ1	Respondent	Question	Applicant's Response
		(b) LCA5B and LCA7B share many landscape characteristics and the solar PV panels appear to cover similar proportions of each area. Please provide further justification for finding that the Operation Phase Year 1 effect on LC5B would be moderate adverse (significant), whereas the effect on LCA7B would be minor adverse (not significant).	
Q9.0.13	The Applicant	ES Section 10.7 Landscape impact generally. The assessment of landscape impact has been undertaken on the basis of published national and local character areas. While there is support for this approach in EN-1(24) paragraph 5.10.12, the NPS also recognises that energy infrastructure is likely to have visual effects on many receptors, some of which are sensitive, including local residents (EN-1(24) paragraphs 5.10.13 and 5.10.14). A significant number of RRs have expressed concern regarding the large scale of the proposal relative to nearby local communities and residential properties and its 'industrialising' effect on the landscape. Although these concerns relate to the size of the proposal, they would be experienced at a smaller scale than the national and local character areas used in the LVIA. The Guidelines for Landscape and Visual Impact Assessment (3rd Edition) recognise that the geographical extent of landscape effects should be considered and refers to a range of scales including site level and the immediate setting (see paragraph 5.50). Potentially therefore, the effects of the proposal, when experienced at a smaller scale, could be more concentrated. Please consider expanding the LVIA to include an assessment of landscape effects at the scale experienced by the local community.	As set out in sections 5.12 to 5.15 of GLVIA3, published and adopted landscape character assessments are considered the most robust documents. Paragraph 5.50 of GLVIA3 relates to the geographical extent over which landscape impacts (effects) arising from a development may be experienced. The impacts of the Scheme will be experienced across a larger area than the Site and immediate setting of the Site and therefore it is at the local LCA, LCT and NCA level that the impacts of the Scheme have been assessed within the ES Chapter 10: Landscape and Visual Amenity **[AS-014]**. Impacts experienced by residents is assessed via the visual amenity assessment as set out within the ES Chapter 10: Landscape and Visual Amenity **[AS-014].**
Q9.0.14	The Applicant	ES Table 10-12. (a) (see also question ExQ9.0.8). The direction of the view being described is not always clear. Please review the table and clarify view directions. (b) ES10.1.5 states that photomontages have been prepared for several viewpoint locations that lie in close proximity to the scheme or where significant effects were identified within the Preliminary Environmental Information Report. However, for example there is no photomontage for VP1, which is close to the proposal and is assessed to experience a significant adverse effect, but a photomontage is provided for VP2 which is not as close and has no significant effects. Please offer further rationale for the photomontages provided.	(a) As confirmed in the response to ExQ9.0.8, ES Figure 10-8 Representative Viewpoint Locations Plan **[APP-163]**, Figure 10-9 through to Figure 10-38 Viewpoint Photography **[APP-193]**, and Figure 10-39 **[APP-194]** through to Figure 10-55 Photomontages **[APP-210]** and have been updated and submitted at Deadline 1. (b) Table 10-12 within the ES Chapter 10: Landscape and Visual Amenity has been reviewed (and submitted at Deadline 1 of the Examination) indicating the view directions. The description of impacts within ES Table 10-12 also refers to direction of views and visible impacts that would appear outside of the view image captured within Figure 10-9 through to Figure 10-38 Viewpoint Photography **[APP-164 to APP-193]**. This is specifically relevant for VP13 that would obtain a wider panoramic view of a number of Solar PV Areas. Within the ES Chapter 10: Landscape and Visual Amenity **[AS-014]** it is assessed that impacts as a result of the Scheme would result in significant adverse effects for residents at VP1 during construction with impacts reducing to not significant levels during operation Year 1. The

ExQ1	Respondent	Question	Applicant's Response
			photomontages have been prepared for operation during Year 1 and Year 15 for viewpoints that have been assessed to experience significant impacts as a result of the Scheme during operation, where the Scheme would be prominent in the view, through professional judgement or where specific locations have been requested through consultation. A photomontage for VP1 was not produced due to the very limited extent of the Scheme that would appear in the view and that has been assessed as low magnitude of change at operation Year 1 and very low magnitude of change at Year 15.
Q9.0.15	The Applicant	ES Figures 10-39 to 10-55. The photomontages do not include Winter Year 15 images. Please provide these images or explain their omission.	ES Figures 10-39 **[APP-194]** to 10-55 **[APP-210]** photomontages illustrate the baseline view during summer and winter, wireline and photomontage at Year 1 for winter and wireline and photomontage at Year 15 during the summer. It is common practice to provide Year 15 summer photomontages to illustrate an indicative representation of the likely view with mitigation planting established whilst in leaf. Notwithstanding, a review has been undertaken of the photomontages and where it could be beneficial to illustrate Year 15 winter photomontages as a result in a change in the view between summer and winter due to no leaf cover. Given the time it takes to prepare these photomontages the Applicant will provide these at Deadline 3 for VP3, VP4, VP5, VP6, VP7, VP10a, VP10b and VP28.
Q9.0.16	The Applicant	ES Figure 10-41 VP4. The year 15 photomontage appears to show mitigation hedge planting along both visible edges of Area 2f. However, it is not clear from ES Figure 2.3 whether such planting is proposed along the western edge of Area 2f. Please clarify the position.	Planting is proposed on both visible edges of Area 2f. Species-rich grassland and enhanced hedgerow is proposed along the south of Area 2f (Featherbed Lane), and Flower rich grassland is proposed along the length of the west of Area 2f and woodland edge mix planting is proposed at intervals. Landscape proposals are illustrated on ES Figure 2-3 **[APP-138]** and within the Framework Landscape Masterplan (Appendix A of the Framework LEMP **[APP-246]**). The Framework LEMP (including the Framework Landscape Masterplan) **[APP-246]** is secured through Requirement 6 of the Draft DCO **[AS-008**] and detailed design approval must be substantially in accordance with the Framework LEMP.
Q9.0.17	The Applicant	ES Figure 10-43 VP6. The Operation Year 15 assessment states that the woodland to the west would remain visible, retaining some of the key characteristics of the view. However, the Summer Year 15 photomontage shows the proposed planting screening medium and long range views. Please elaborate on the year 15 assessment of this viewpoint.	Figure 10-43(c) **[APP-198]** Wireline Winter Year 1 Viewpoint 6 Willitoft Road, Spaldington illustrates that the woodland in the background would be visible beyond the solar PV panels. Figures 10-43 (e) and (f) **[APP-198]** illustrate a full height boundary hedgerow during summer when the hedge would be at its highest. The assessment (Table 10-12, ES Chapter 10: Landscape and Visual Amenity **[AS-014]**) is undertaken in winter year 15 when the hedgerow vegetation would be without leaf and would not provide a solid screen, enabling the longer distance views towards the woodland on the horizon.
Q9.0.18	The Applicant	ES Figure 10-44 VP7. The construction phase and operation phase Year 1 assessments state that the upper sections of the GC substations would be discernible. However, they are not shown in the photomontage. Please clarify the position.	Section 10.4 in the ES Chapter 10: Landscape and Visual Amenity **[AS-014]** outlines the assumptions, limitations, and uncertainties within the assessment. Paragraph 10.4.3 states that all fieldwork has been undertaken from publicly accessible locations within the Study Area and that professional judgement has been used to assess residents' views. The direction of view chosen for the VP7 baseline view and photomontage is a south east view from the front of the residential receptor on publicly accessible land. Likely views of the Grid Connection Substations will be to the north east from the rear of the residents property where there is no publicly accessible land and lie outside of the extent of the viewpoint photography.

ExQ1	Respondent	Question	Applicant's Response
Q9.0.19	The Applicant	ES Section 10.7 Visual impact assessment generally. For context: • ES10.7.11 states, in relation to Howden Route 20, that gaps in the mitigation planting aim to provide longer distance views, but goes on to say that views from outside the route would be heavily screened by mitigation planting. • VP10a and VP10b. The Operation Phase Year 15 assessment for VP10a refers briefly to the foreshortening of the view north, albeit that the mitigation grassland would provide a degree of open aspect. The assessment for VP10b does not refer to a foreshortening effect, although Figures 2-3 and 10-47 show hedge planting along the PRoW. Solar PV panels, fencing and, in many cases hedge planting, is proposed on both sides of a number of PRoWs and highways flanked by solar PV areas. (a) Please expand on the cumulative foreshortening / enclosing effect of these changes to what are, in many cases, currently extensive views. (b) Although some views are of landscapes assessed to have low value, the change would be experienced over a wide area. Please comment on this aspect.	There is clarity needed on this point as the text refers to views outside the route, but towards the Solar PV Areas views of the Solar PV Areas would be screened by mitigation planting. (a) As illustrated on the Framework LEMP Masterplan **[APP-246]** there are a number of existing hedgerow boundaries that are located along field boundaries. In a number of locations these boundaries have been eroded and lines of field boundaries are demarcated by mature trees or intermittent sections of vegetation. The Scheme proposes to reinstate a number of previously removed/ lost hedgerows and manage them for increased biodiversity benefit. For the PRoW SPAL14 and SPAL15 these will be located in proximity to proposed hedgerow with trees that will seek to reinforce these positive key landscape characteristics. There will be a degree of foreshortening of the view for a small number of locations as a result of the planting of hedgerows, but this would be offset by the reinforcement of key landscape characteristics. There are intermittent sections of woodland edge planting proposed along the boundary of the PRoW buffers. These would be low level as illustrated on the cross-sections within the Framework LEMP **[APP-246]** and would not extensively screen views, instead it is proposed to soften the view of fencing and Solar PV Panels. (b) The impacts on visual amenity for users of the Howden 20 walking route as a transient receptor is presented in Section 10.7 of ES Chapter 10: Landscape and Visual Amenity **[AS-014]**. This assessment takes into consideration the range of views that the receptor will experience whilst walking along the Howden 20 route. The judgement of landscape value in relation to landscape character areas is presented in Section 10.5 of ES Chapter 10: Landscape and Visual Amenity **[AS-014]**. The change to landscape character would be through the enhancement of the landscape key characteristic of hedgerows along field boundaries across the Scheme. The characteristic availability of long views in specific locations would be impacted on a very local scale throughout the landscape.
Q9.0.20	The Applicant	ES10.10.13. Please provide further explanation for the selection of the viewpoints (2, 14, 23, 24 and 29) included in the visual effects cumulative assessment.	As stated in paragraph 10.10.13 within the ES Chapter 10: Landscape and Visual Amenity **[AS-014]** viewpoints 2, 14, 23, 24 and 29 have been screened into the assessment of cumulative visual effects. All other viewpoints were screened out because receptors at those viewpoints would experience negligible impacts or that the cumulative developments would not be visible from the viewpoint, be of such a small scale, or at a long distance, or there would be a lack of intervisibility with the Scheme and would therefore not give rise to cumulative effects.
Q9.0.21	The Applicant	Significant visual effects during decommissioning on users of the long-distance Howden 20 route (moderate adverse) during decommissioning are reported in ES Chapter 10, but not reported in the summary within ES Chapter 18 (summary of Environmental Effects). Please explain or correct this discrepancy.	The omission of Howden 20 walking route from Table 18-3 of the ES Chapter 18: Summary of Environmental Effects has been corrected within **[AS-018]** as part of the Applicant's response to Section 51 Advice Letter.
10.	**Noise and Vibration**		
Q10.0.1	The Applicant and ERYC	ES Table 11-2. The ERYC consultation response (page 11-8) requests that the threshold values of noise to be applied during daytime working are included in the CEMP/Decommissioning Environmental Management Plan (DEMP) [APP-240]. Such	The Framework CEMP **[APP-238]** and Framework DEMP **[APP-240]** contain management measures to reduce construction and decommissioning noise emissions as far as reasonably practicable. No significant construction noise effects are identified during core daytime work hours in Chapter 11 **[APP-063]**. The Framework Construction Environmental Management Plan **[APP-238]** commits to applying for Section 61 consent where noisy works are required outside of core

ExQ1	Respondent	Question	Applicant's Response
		values do not appear to be included in the CEMP/DEMP or the dDCO. (a) Applicant Please explain the rationale for not including them. (b) ERYC Please comment on the Applicant's approach.	construction working hours. This process would allow appropriate construction noise thresholds to be agreed with East Riding of Yorkshire Council.
Q10.0.3	The Applicant	ES11.4.5 begins by stating that the solar PV mounting structures would be installed by direct drive technique and ends by stating that they would use auger piles. Please clarify the position.	Solar PV mounting structures would be installed by direct drive techniques; however, as no noise data for direct drive plant was available, it was assumed that the direct drive technique would provide similar noise levels to auger piling. This was considered a reasonable assumption as mobile direct drive units are not high noise generating items of plant.
Q10.0.4	The Applicant	ES Table 11-4. Please review accuracy of the receptor distances used in this table. In particular, the figures given for the distance between receptors 9, 38, 40, 41 and 45 and the GCC seem amiss (by cross-referencing with Figures 1-3 and 11-3).	A review of distances in Table 11-4 of Chapter 11 **[APP-063]** has been undertaken and distances were confirmed as correct. It is noted that the receptor locations in Figure 11-1 **[APP-211]** were slightly offset from their actual locations due to a coordinate transformation error in GIS. An updated version of Figure 11-1 has been submitted at Deadline 1 of the Examination.
Q10.0.6	The Applicant	ES Appendix 11-4 [APP-107] Table 3. For some lines in this table, the figures appear to be wrong (that is, the difference between the central inverter option and the string inverter option is not as stated.). Please review the table.	The difference between the central inverter option and the string inverter option were calculated without first rounding the predictions to no decimal places. As such, in some cases the difference between the options is out by ±1dB. This does not result in a material change to the assessment and the results still support the conclusion that the string inverter option would not result in any new significant effects being identified. An updated version of Appendix 11-4 **[APP-107]** has been submitted at Deadline 1 of the Examination.
Q10.0.7	The Applicant	ES11.4.56 and ES11.7.18. Please provide further explanation of (a) the relationship between the values set out in ES Tables 11-7 and 11-8, and (b) how they relate to the findings in ES11.7.18.	Table 11-8 of Chapter 11 **[APP-063]** incorrectly reproduces Table B.2 of BS 5228-2:2009+A1:2014. An updated version of Chapter 11 **[APP-063]** has been submitted at Deadline 1 of the Examination. A Peak Particle Velocity (PPV) of 15mm/s is adopted as a transient vibration guide value for cosmetic damage as a residential property as per Table B.2 of BS 5228-2. As a precautionary measure, advice in BS5228-2 is also considered: "*Where the dynamic loading caused by continuous vibration is such as to give rise to dynamic magnification due to resonance, especially at the lower frequencies where lower guide values apply, then the guide values in Table B.2 might need to be reduced by up to 50%".* As such, a PPV of 7.5mm/s is adopted for potential cosmetic damage from continuous vibration at a residential property. Table 11-7 of Chapter 11 **[APP-063]** provides the significant observed adverse effect level (SOAEL) for human response to vibration which is referenced in paragraph 11.7.18.
Q10.0.8	The Applicant	ES Table 11- 8. This table does not include typical construction types for the kinds of residential buildings which are likely to be most affected by the proposal. Columns 2 and 3 have the same headings. Please review and update the table.	Table 11-8 from ES Chapter 11 **[APP-063]** is not fully reproduced from BS 5228-2:2009+A1:2014 due to a document production error. Noise criteria should apply on row 1 to "Reinforced or framed structures, Industrial and heavy commercial buildings" and on row 2 to "Unreinforced or light framed structures Residential or light commercial buildings". The last column applies to frequencies of 15Hz and above and should not be for frequencies of 4 Hz to 15 Hz. An updated version of Chapter 11 has been submitted at Deadline 1 of the Examination.

ExQ1	Respondent	Question	Applicant's Response
Q10.0.9	The Applicant	ES Table 11-8 (page 11-27) purports to set out vibration criteria for cosmetic damage to buildings according to BS-5228-2:2009+A1:2014 (Table B.2). However, the information presented within ES Table 11-8 differs from that set out in BS-5228. Please confirm whether this is a textual error and if the vibration assessment that was undertaken was based on the criteria provided in BS-5228.	Effect criteria in Table 11-8 from ES Chapter 11 **[APP-063]** is set out with reference to Table B.2 from BS 5228-2:2009+A1:2014, which provides transient vibration guide values for cosmetic damage. Errors in transcription of the table were made as described in the response to Q10.0.8 above. An updated version of Chapter 11 has been submitted at Deadline 1 of the Examination.
Q10.0.11	The Applicant and the LPAs	ES11.6.4. (a) The LPAs Please comment on the approach to noise generating activities (NGAs) in the first and last working hours of the day. Would the restriction be enforceable? (b) Applicant and the LPAs How would the restriction on NGAs operate with regard to the construction compounds which may be the focal point for workers arriving and leaving the site in the first and last hours of the day?	Table 7 of the Framework Construction Environmental Management Plan **[APP-238]** makes a commitment that "…*use of power tools or piling, would be limited to the hours between 08:00 and 18:00 from Monday to Friday and between 08:00 and 13:00 on Saturday*". The Framework Construction Environmental Management Plan **[APP-238]** is secured by Requirement 11 of Schedule 2 of the draft DCO. Table 2 of Appendix 13-5 Framework Construction Traffic Management Plan **[APP-113]** identifies that there would be 178 car/ minibus movements between each of the hours of 06:00-07:00 and 19:00-20:00. These movements are covered in the assessment of construction traffic noise in section 11.7 of Chapter 11 **[APP-063]**. No significant adverse noise effects are identified as a result of construction traffic.
Q10.0.12	The Applicant	ES11.6.10b indicates the possible use of open cut cable laying as an alternative to HDD. Other parts of the ES assess and propose mitigation based on the use of HDD for sensitive (eg Landscape and Visual Chapter 10) and main river (eg Chapter 8 Ecology) crossings. Please comment on this difference in approach.	Unless committed to by way of mitigation (e.g. for ecological purposes), HDD would only be used if no other method of cable laying was appropriate. HDD works are considered to represent a worst-case in terms of noise due to the potential for 24-hour activities and have therefore been assessed at the HDD locations shown on Figure 2-4 **[APP-139]**. Although night-time work would be avoided where practicable, it may be required due to an emergency or during HDD where the activity needs to be completed as soon as practicable to limit services disruption. Mitigation measures have been secured in the Framework Construction Environmental Management Plan **[APP-238]** to avoid significant noise effects as a result of HDD activities.
Q10.0.13	The Applicant	ES11.6.15. Should the reference in the last sentence of this paragraph be to the OEMP rather than the Outline Design Principles Statement?	Table 5 of the Framework Operational Environmental Management Plan **[APP-239]** contains a commitment that noise at sensitive receptors will be no higher than the levels presented in section 11.7 of ES Chapter 11 **[APP-063].** ES11.6.15 correctly references the Framework Operational Environmental Management Plan **[APP-239]** where this commitment is stated, no change is required.
Q10.0.14	The Applicant	ES11.6.15 and Figure 11-2. Please expand on the rationale for the locations of the noise contours shown in Figure 11-2.	Figure 11-2 Operational Noise Contours **[APP-212]** are based on the indicative site layout Figure 2-3 **[APP-173]**, which provides indicative locations of noise generating source i.e. inverters and transformers. Details of operational noise source data are provided in Appendix 11-4 **[APP-107]**. Although the indicative Scheme layout has been optimised to minimise noise levels at sensitive receptors, there is a requirement to retain some flexibility on where infrastructure will be located on the Solar PV Site. Consequently, if there is a decision in the future to move noise generating infrastructure closer to sensitive receptors than shown in Figure 11-2, ES Volume 3 [EN010143/APP/6.3], the Applicant commits that noise at sensitive receptors will be no higher than the levels presented in Section 11.7. The measures to achieve this are discussed in Section 11.6 and will be secured in the Framework OEMP **[APP-239]**. The Outline Design Principles Statement **[APP-235]** also secures that Field Stations (which are noise generating infrastructure) would not be located within 250 m of a residential property.

ExQ1	Respondent	Question	Applicant's Response
Q10.0.15	The Applicant	ES11.7.4 and Table 11-12. How do the construction noise predictions for NGA1 take into account the locations of the construction compounds where activity may be concentrated.	NGA1 construction noise predictions take into account activities at Construction Compound Areas A, B and C. Activities at Construction Compound Area D were not explicitly covered. The nearest receptors to Construction Compound Area D are approximately 140m away (R45) and 170m away (R46). At this distance, noise levels from compound activities would not exceed the construction noise likely observed adverse effect level (LOAEL) for core daytime work hours of 65 dB LAeq,T. No receptors are within 300m of Construction Compound Area E, which is the study area distance for construction activities as defined in paragraph 11.4.15 of Chapter 11 **[APP-063].**
Q10.0.16	The Applicant	ES11.7.9. What assurance can be given that there is sufficient flexibility in the scheme layout to ensure that no cable laying work would take place within 15m of receptors R16, R26 and R42?	Table 7 of the Framework Construction Environmental Management Plan **[APP-238]** makes a commitment that: "*Works undertaken in Grid Connection Corridor and the Interconnecting Cable Corridor would be undertaken at least 15 m from a sensitive receptor where practicable*".
Q10.0.17	The Applicant	ES11.7.13 and Table 11-15. Please clarify the rationale for the selection of the receptors in Table 11- 15. It does not appear to include all of the receptors closest to potential HDD locations (by cross referencing with Figures 2-4 and 11-1).	Receptors were incorrectly identified and have been updated in a new version of Chapter 11 **[APP-063]** which has been submitted at Deadline 1 of the Examination. The receptor update does not change the conclusions of the assessment.
Q10.0.18	The Applicant	ES11.7.19. Please provide further justification for the finding that ground borne vibration from piling would be below the LOAEL.	Table D.6 of BS 5228-1:2009+A1:2014 data provides information on typical vibration levels from rotary bored piling. This data indicates that, at a distance of 50m, vibration levels would be below the LOAEL of 0.3 mm/s. An updated version of Appendix 11-4 **[APP-107]** has been submitted at Deadline 1 containing details on piling vibration.
Q10.0.19	The Applicant and the LPAs	ES11.7.21, ES11.7.25 and ES11.7.26. Please comment on whether the use of communication with affected receptors would be sufficient to mitigate the effect such that it would be not significant.	Whilst the SOAEL may be exceeded at properties for short periods of time (less than a day) if cable laying activities are required within 25m of a property, the duration of exposure is not considered sufficient to warrant identification of a significant adverse effect. This conclusion is supported by text quoted form BS 5228-2009+A1:2014 in paragraph 11.7.24 of Chapter 11 **[APP-063]**, which states: *"It is likely that vibration of this level in residential environments will cause complaint, but can be tolerated if prior warning and explanation has been given to residents".*
Q10.0.20	The Applicant	R8 is not listed in ES11.7.23. However, according to ES Table 11-4, R8 is within 25m of the GCC. Please review the distance between the GCC and all receptors.	R8 was included in the receptors within 25-50m of the Grid Connection Corridor in error and should have been included in the group of receptors within 25m. An updated version of Chapter 11 **[APP-063]** has been submitted at Deadline 1 of the Examination.
Q10.0.21	The Applicant	ES11.7.27. Based on ES Figures 2-4 and 11.1, receptors R46 (HDD3), R43 and R44 (HDD4) appear to be in close proximity to HDD sites. Please check the distance between HDD sites and all R* receptors.	Receptors were incorrectly identified and have been updated in a new version of Chapter 11 **[APP-063]** which has been submitted at Deadline 1 of the Examination. The receptor update does not change the conclusions of the assessment.
Q10.0.24	The Applicant	ES11.10.12 and ES11.10.13. These findings assume that the identified cumulative developments would not give rise to significant noise effects after mitigation at the construction and operational phases. However, it is possible that decision makers could find that the benefits of the scheme would outweigh any such effects. Please comment on this eventuality.	As discussed in section 11.10 of ES Chapter 11 **[APP-063]**, based on identified separation distances and requirements to implement Best Practicable Measures, it is considered that any overlapping of construction phases between the Scheme and the other nearby development schemes during construction would not result in any in-combination cumulative effects at common noise sensitive receptors. The assessment of cumulative noise and vibration operational effects has been undertaken based on the reasonable assumption that cumulative developments would be

ExQ1	Respondent	Question	Applicant's Response
			subject to planning restrictions requiring new developments to achieve operational noise standards. Given this and the relative distance between cumulative developments and the Scheme there would be no significant adverse effects from those developments. The cumulative schemes (where available and relevant) will be reviewed, and confirmation regarding whether any additional information pertinent to the cumulative noise and vibration impact assessment is required will be provided at Deadline 2
11.	**Socio-economic Effects**		
11.0	**General Socio-economic effects**		
Q11.0.1	The Applicant	ES12.4.5. The assessment assumes that the shortest likely construction period represents the worst case scenario because it would result in the greatest intensity of activity. However, a longer construction period may lead to disturbance and inconvenience over a longer period. Please comment.	The assumption that the shortest likely construction period represents the worst case scenario reflects the approach of the other assessments which ES Chapter 12: Socio-economics and Land Use [**APP-064**] draws upon when assessing amenity and severance effects (e.g. transport, noise, dust). It is acknowledged that a longer construction period may lead to disturbance and inconvenience over a greater period of time, however the degree of disturbance and inconvenience would likely be less on a day-to-day basis as activity would be less intense. This is a common approach to assessment and reflects professional judgement.
Q11.0.2	The Applicant	ES Table 12-4. The level and nature of activity in the construction and decommissioning would be very different from those during the operational phase. Please comment on how this is taken into account in the additionality factors in ES Table 12-4.	It is acknowledged that that there would be a greater level of economic activity during the construction and decommissioning stage, and that the nature of economic activity would also be different within the operational stage. Nonetheless, overall when considering supply chain activity, local worker spending and other additionality effects across the Scheme, the Applicant considers the assumptions set out in Table 12-4 to be a reasonable and proportionate approach to estimating additionality. It should be noted that if different additionality assumptions were applied for the operational phase (e.g. a lower multiplier was used), the conclusions of the operational phase assessment (a negligible, not significant effect on the local workforce) would not change.
Q11.0.3	The Applicant	ES12.5.10. There appears to be a typographical error for the number of working age residents in the study area. Please review this figure	ES12.5.10 has been reviewed and no typographical error has been identified. In 2020, there were 3,154,772 residents of working age within the economic study area (defined as a 60 minute drive time from the Site). The economic study area had a total population of 5,051,069 in 2020, and so this implies the working age population is 62.5% of the total population.
Q11.0.4	The Applicant	ES12.5.47. Please expand on why a future baseline year of 2042 was used for this topic particularly when, due to the uncertainty regarding future land uses, the existing baseline is used for that parameter.	Using 15 years post construction (2042) reflects the furthest year into the future for which ONS provides population data and therefore provides a sound basis for assessment against a future baseline.
Q11.0.5	The Applicant	ES12.7.12. The multiplier effects described in the HCA Additionality Guide appear to relate to the long-term effects of various types of development. Is it appropriate to apply a medium range multiplier to the short-term effects during the construction period, particularly when there is little evidence that a significant proportion of the construction materials (eg the solar PV panels) would be sourced locally and therefore contribute to the supply linkage multiplier within the study area?	The Applicant is confident that it is appropriate to use the multiplier effect 'ready reckoners' set out in the HCA Additionality Guide when assessing short term, construction phase effects; this approach has been used on numerous similar NSIP schemes (for example, Longfield Solar Farm). It is also considered a reasonable and proportionate approach, based on the information available, to apply the medium multiplier (1.5) when estimating construction phase effects. It is acknowledged that some construction materials would not be sourced locally, but others (e.g. fencing) would be. Equally, there is no evidence to suggest worker spending (the other element of the multiplier) would be lower for construction phase workers than for operational phase workers.

ExQ1	Respondent	Question	Applicant's Response
			The Applicant would also like to highlight that if different additionality assumptions were applied for the construction phase (e.g. a lower multiplier was used), the conclusions of the assessment (a minor beneficial, not significant effect on the local workforce) would not change.
Q11.0.6	The Applicant	ES12.7.15 and Skills, Supply Chain and Employment Plan (SSCEP) [APP-247]. The Applicant's commitment to pursuing the opportunities identified in the SSCEP is variously described as 'consider', 'investigate' or the like. What level of reliance can be placed on achieving the claimed outputs set out in SSCEP Table 6.1?	The Skills, Supply Chain and Employment Plan (SSCEP) is a Framework document. A detailed SSCEP will be prepared post consent as required by requirement 16 of Schedule 2 to the draft DCO **[AS-008]** and will need to be in substantial accordance with the Framework SSCEP This will be approved by the relevant planning authorities and will need to be implemented as approved. Further research and, crucially, consultation with the relevant planning authorities (East Riding of Yorkshire Council and North Yorkshire Council) post consent will be undertaken to establish which objectives and activities identified in the Framework will be most effective, how they are best refined or expanded, and how they should be delivered.
Q11.0.7	The Applicant	ES12.7.33 and ES12.7.50. ES Table 10-12 provides the visual assessment from representative viewpoints. It finds that the sensitivity of PRoW (where present) is medium or high because 'users of PRoW are typically likely to be involved in activity which includes enjoyment of the view'. (a) Given this finding, please expand on why ES12.7.33 and ES12.7.50 find that PRoW would have a low sensitivity. (b) Please comment whether the proposed fencing and planting would have a detrimental enclosing effect on the views along the PRoW, notwithstanding the proposed buffer separation.	(a) ES Table 10-12 considers the sensitivity of PRoWs and their users to visual impacts. ES 12.7.33 and ES 12.7.50 on the other hand consider the sensitivity of PRoWs and their users to changes in accessibility, taking into account for example the destination and aims of the user and how journey times might be affected by a diversion. There is a network of alternative PRoW within the Study Area that could be used as substitutes in the event of a diversion; also, there are no national recreational routes which fall within the Solar PV Site, and the PRoW are unlikely to be used to access employment. Therefore, for the purposes of the socio economic and land use assessment, PRoW are considered to have low sensitivity. (b) The proposed buffer separation for PRoWs is of a considerable width and would continue to allow views along field edges and towards tall vegetation, such as trees and woodland, that would appear in the background of the view. There would be some enclosing of views in direct proximity to the Solar PV Panels and fencing. Paragraph 10.7.10 of ES Chapter 10: Landscape and Visual Amenity **[AS-014]** sets out how the views of users of the Howden 20 would be impacted where the route lies alongside the Solar PV Areas *"The fencing and solar PV panels will be clear and form the main focus of the view, although existing hedgerow, hedgerow trees and other vegetation will be visible in the background of the view beyond the solar PV panels."*
Q11.0.8	The Applicant	ES12.7.34 and 12.7.35. How would permission to use, and compensation for any damage caused to, private verges and hardstandings be secured in the DCO?	Similar to other NSIP DCOs, the Applicant has included powers in the draft DCO **[AS-008]** to enable it to temporarily use all land within the Order limits for the purposes of constructing (Article 29) and maintaining (Article 30) the Scheme (although in all cases voluntary agreement is preferred). Article 29(6) and Article 30(6) make provision for the undertaker to make payment of compensation to owners and occupiers who suffer any loss or damage from the exercise of these powers.

ExQ1	Respondent	Question	Applicant's Response
Q11.0.9	The Applicant	ES12.7.44. (a) Please provide further details of the expected loss of three existing jobs. (b) Has there been any consultation on this matter with the affected agricultural businesses?	(a) It is estimated that the existing Solar PV Site (which is predominantly arable farmland) supports three jobs. This estimate is based on impact assessments undertaken for other solar schemes where the existing land use is predominantly arable agriculture rather than a survey of agricultural businesses within the Solar PV Site. (b) Consultation with the affected agricultural businesses has occurred as a result of statutory requirements and land negotiations. The loss of employment as part of the change in land use has not been a matter that has been raised in these discussions and through discussion and land enquiry it has been confirmed no tenant agricultural businesses are within the Solar PV Site.
Q11.0.10	The Applicant	ES12.10.7 Although the effect on the hotel, bed and breakfast, and inns accommodation sector is assessed as negligible overall, Table 12-19 indicates that the number of rooms available in summer months would be very low, suggesting that even a small increase in demand from the concurrent implementation of cumulative schemes could lead to a shortage. Please comment.	It is highly unlikely that all 400 peak workers would require accommodation within 30 drive time of the site, as assessed in Table 12-19 (which presents a worse case scenario). As shown in Table 12-20, if the drive time is increased to within 60 minutes of the Site, over 5,000 rooms would be available in the busiest month (July). In addition, the supply of rooms in the hotel, bed and breakfast or inns sector would in reality be supplemented by alternative accommodation such as Air BnB, serviced apartments and private rental. This capacity would be available to accommodate workers from any of the cumulative developments identified which could come forward concurrently with the Scheme.
Q11.0.11	The Applicant	Please expand on how equality, diversity and inclusion matters have been taken into account in the assessment of socio-economic effects.	While ES Chapter 12: Socio-economics and Land Use [**APP-064**] considers important determinants of equality and inclusion such as employment and access to community facilities, equality, diversion and inclusion are addressed directly within the Equality Impact Assessment [**APP-248**] which was submitted with the DCO Application.
11.1	**Public Rights of Way**		
Q11.1.1	The Applicant and ERYC	ES2.3.4. Please provide an update on the routing of the Howden 20	As detailed in Table 3 of the Framework Public Rights of Way Management Plan **[APP-245]**, part of the Howden 20 route lying to the south of Spaldington Road will be subject to a temporary diversion during construction. The extent of the temporary diversion consists of an approximate length of 220 m to the south from Great Common Drain, running alongside the current footpath and it is proposed that this will be managed and diverted in accordance with the measures set out in section 3.7 of the Framework PRoWMP. A detailed PRoWMP which will need to substantially accord with the Framework PRoWMP is secured via requirement 17 of Schedule 2 of the draft DCO **[AS-008]**.
Q11.1.2	The Applicant	Public Rights of Way Management Plan (PRoWMP) paragraph 3.7.2e [APP-245]. (a) Please expand on the content of the proposed communication strategy. (b) Please provide information on any consultation with local access groups.	The Communication Strategy will be developed further by the Contractor on behalf of the Applicant prior to commencement of construction activities. It will have a focus on regular provision of information for people regarding diversion and management proposals. It will establish mechanisms for meaningful two-way dialogue with affected groups. Consultation with local access groups and other interested parties relating to access, will also be proposed in the Communications Strategy.
Q11.1.3	The Applicant	PRoWMP paragraphs 3.7.4 - 3.7.6. Please clarify the proposals for the maintenance and reinstatement of the surfacing of PRoW, and management of any adjoining vegetation, during the construction phase.	Details of maintenance and reinstatement of the surfacing of PRoW and adjoining vegetation associated with works for PRoW diversions will be included in the highway condition surveys, which are committed to within the Construction Traffic Management Plan **[APP-113]**.

ExQ1	Respondent	Question	Applicant's Response
Q11.1.4	The Applicant	PRoWMP paragraph 3.7.5. Please clarify the meaning of the word 'considered' in this paragraph. Does it imply some uncertainty about whether the proposed measures would be implemented?	The Framework PRoWMP is a Framework document and therefore sets out proposed measures to be included in a detailed PRoWMP. The detailed PRoWMP will be prepared post consent as required by requirement 17 of Schedule 2 to the draft DCO **[AS-008]** and will need to be in substantial accordance with the Framework PRoWMP. This will be approved by the relevant planning authorities and will need to be implemented as approved. Measures for the management of PRoW diversions during construction which paragraph 3.7.5 refers to will therefore be implemented via the detailed PRoWMP to be approved.
Q11.1.5	The Applicant	ES12.6.10 and PRoWMP paragraph 4.1.5b. What is the purpose of the eastward permissive route. Would it provide public access over the Habitat Enhancement Area?	ES Chapter 2: The Scheme **[APP-054]** paragraphs 2.7.42–2.7.44 describe the proposed permissive paths. One section of the proposed permissive path will continue to the edge of (but not over) the grassland habitat created in the east part of Solar PV Area 1e, adjacent to the River Foulness. This will allow the users of the permissive path to view birds and other wildlife using the wet grassland habitat. As noted in ES2.7.42, no permissive paths have been proposed within the Ecology Mitigation Area to avoid disturbance.
12.	**Transportation and Traffic**		
Q12.0.1	The Applicant, National Highways (NH) and the LPAs	Please provide an update on discussions with NH and the local highway authorities and whether any agreement has been reached regarding the need for junction capacity assessments to support any conclusions reached in the assessment of transport effects.	The Applicant has engaged with North Yorkshire Council and sought to address any junction related queries prior to application submission. North Yorkshire Council's response received in February 2023 did not stipulate any particular requirement for junction capacity assessments. The Applicant will continue to engage with North Yorkshire Council to address any subsequent comments that are raised during the examination and work towards agreeing matters in a Statement of Common Ground. The Applicant engaged with East Riding of Yorkshire Council and sought to address any junction related queries prior to application submission. East Riding of Yorkshire Council's response received in March 2023 did not stipulate any particular requirement for junction capacity assessments. The Applicant continues to engage with East Riding of Yorkshire Council in relation to access matters and has received relatively minor comments on access and passing place updates on the 30 May 2024. The Applicant will continue to engage with East Riding of Yorkshire Council to ensure all matters are addressed, and will update any subsequent examination documentation and work towards agreeing matters in a Statement of Common Ground. A Statement of Common Ground between the Applicant and National Highways has been agreed and was signed on 14 June 2024. The SoCG, specifically covers the agreed position with regard to the Scheme's potential impacts of construction vehicle movements on the M62 Junction 36 and 37. The SoCG states that as the volume of traffic expected during the network peak hours (e.g. 08:00–09:00 and 17:00–18:00) are zero the Applicant has not undertaken any junction assessments at these locations and NH are in agreement with this approach.
Q12.0.3	The Applicant	ES13.4.8 recognises that winter working hours may mean workers coming and going closer to network peak hours. While the percentage increase may be lower due to the higher traffic baseline, the network itself may be operating closer to capacity and therefore more sensitive to a relatively small percentage increase in movements. Please comment.	During the winter months, a lower number of workers would be expected than during summer periods, due to the nature of construction activity. The worst-case assessment is that presented in the ES, i.e. the highest volume of construction traffic. The ES assessment accounts for the baseline being low, as the absolute level of traffic increase is considered, in addition to the percentage increase, in assessing the magnitude of impact.

ExQ1	Respondent	Question	Applicant's Response
			It is noted that some workers would arrive and depart at times closer to network peaks during winter months. These absolute levels of traffic would be lower than in Summer, and being measured against a higher baseline would mean that the percentage impact would be lower.
Q12.0.4	The Applicant and LPAs	ES13.4.30 and ES Tables 13-5 and 13-14 Transport Assessment Appendix 13-4 paragraph 4.3.3 [APP-113] state that the ATC locations are considered to provide representative traffic flows. The ATC locations are also used for the measurement of receptor sensitivity. Please comment on whether locations selected to provide representative traffic flows necessarily capture an appropriate range of locations to measure receptor sensitivity which is likely to be related to the nature of nearby land uses.	It is stated in paragraph 13.4.30 of ES Chapter 13 **[APP-065]** that 'the road link sensitivity has been based upon the worst-case sensitivity of the whole link.' Therefore, the sensitivity classification applies to the link as a whole, with the ATC used specifically as a data collection point. The ATC locations were chosen to represent those roads most likely to be subjected to significant adverse effects as a result of increased traffic use. When choosing the locations of the ATCs, due consideration was taken to ensure that sensitive receptors such as schools, residential properties, churches, play parks, care homes were represented by a sufficiently close ATC. Furthermore, the locations of the ATC have been chosen to ensure that the traffic data derived is representative of the link as a whole. The study area has been agreed with the relevant Highways Authorities.
Q12.0.5	The Applicant and LPAs	ES Table 13-6. (a) Please comment on whether the criteria set out in this Table capture the full extent of matters referred to in the cited IEMA Guidelines. (b) Are the thresholds set at reasonable levels.	The Applicant considers that the criteria in Table 13-6 captures the full extent of matters referred to in the IEMA Guidelines cited, and that the thresholds are set at reasonable levels. The Transport and Access ES chapter was initially developed in line with the 1993 IEMA Guidelines (Ref 13-16) prior to the release of the updated IEMA Guidelines in July 2023 (Ref 13-15). Following a review of both the 1993 and 2023 guidelines, the only substantive change (i.e. that could potentially change the significance of effects) to the guidelines relates to the assessment of Fear and Intimidation, which now requires the assessor to determine a baseline 'degree of hazard' based upon the proportions of average traffic flow over an 18-hour day; the total number of HGVs; and the speed of traffic. This is repeated using the construction traffic flows and a new 'score' determined. The magnitude of the Fear and Intimidation impact is then determined based upon the change in the score. Within the assessment presented in ES Chapter 13 **[APP-065]** there are predicted to be negligible effects at the majority of locations in relation to Fear and Intimidation, with minor effects at two locations. It is not expected that the magnitude of impacts would change when applying the 2023 IEMA Guidelines, therefore would not result in generating any further significant effects. The remainder of the assessment criteria, as set out in Table 13-6 of Chapter 13: Transport and Access **[APP-065]** would not change as a result of using the 2023 IEMA Guidelines.
Q12.0.6	The Applicant	ES13.5.51 and ES13.5.52. Given that seven of the 14 incidents identified along the B1228 were on the section of road that would be used to access Compound B, please provide further justification for finding that construction traffic would not aggravate the existing pattern of safety issues.	All of the seven accidents identified were slight in terms of severity and did not have any common causality that would represent an inherent highway safety issue. In terms of construction traffic, which will be temporary, it is predicted that a total of 185 two-way vehicles trips will use this section of the road network (Link 5) per day as a worst-case. This includes a total of 161 car and 24 HGV movements.

ExQ1	Respondent	Question	Applicant's Response
			Construction traffic will be carefully managed throughout the construction period through the implementation of a detailed Construction Environmental management Plan and a detailed Construction Traffic Management Plan secured by requirements in Schedule 2 of the draft DCO both of which need to be in substantial accordance with the Framework Construction Environmental Management Plan **[APP-238]** and Framework Construction Traffic Management Plan **[APP-113]**. These documents provide full details of mitigation measures that are proposed to prevent or reduce potential adverse effects associated with traffic using roads within the vicinity of the Scheme. The specific measures related to road safety include; the use of traffic marshalls at access points, appropriate design of access locations to ensure swept paths and visibility splays are achieved, temporary traffic management (e.g. temporary traffic signals), appropriate signage, HGV and other vehicle arrival / departure timing restrictions to avoid busier periods; and a clear communication and education strategy for all workers / delivery drivers.
Q12.0.7	The Applicant and the LPAs	Transport Assessment (TA) ES Appendix 13-4 [APP-112] paragraph 5.8.1 refers to informal parking, and paragraph 9.5.5 c and u refers to minimum and limited levels of parking at the compounds, but does not appear to specify the minimum number of spaces to be provided. The Construction Traffic Management Plan (CTMP) ES Appendix 13-5 [APP-113] paragraph 5.4.2 specifies the maximum numbers of spaces at each compound and appears to be based on TA Table 19. (a) Applicant Please clarify the arrangements for construction worker parking, including the minimum number and distribution of spaces and the capacity of the compounds to accommodate them. (b) Applicant Would the minibuses used to transport construction workers remain at the compounds during the working day and therefore require space to park? If not, should their movements off site be added to the trip generation figures used in the TA? (c) LPAs Please comment on the assumptions used for construction worker minibus use and car sharing in TA paragraphs 7.2.2 to 7.2.4.	The number of car parking spaces within each compound location is proposed in section 5.4.2 of the Framework Construction Traffic Management Plan **[APP-113]**. This is based on a maximum forecast demand at each compound, as set out in Table 19 of the Transport Assessment **[APP-112]**. (a) A detailed Construction Traffic Management Plan will be developed post consent in accordance with requirement 13 Schedule 2 of the draft DCO **[AS-008]** which will provide details of the car parking arrangements for the construction compounds. The detailed CTMP will need to be in substantial accordance with the Framework CTMP and therefore, following the involvement of the construction contractor in the preparation of the detailed CTMP, compound parking arrangements would likely remain as per the Framework CTMP or a reduction proposed. (b) Sufficient space will be provided within the five compounds to facilitate parking for the 16 expected daily minibuses, which will stay on site during the day.
Q12.0.8	The Applicant	ES13.7.2 Please expand on the justification for the number of vehicle movements expected during the construction phase	The predicted number of workers and subsequent vehicles required to transport the workers needed for construction has been derived by the Applicant based on knowledge and implementation of previous schemes of a similar size and nature. The worker trip generation methodology is described in section 7.2 of the Transport Assessment **[APP-112]**. In summary, this outlines the methodology used to predict the number of vehicles generated each day during construction. It indicates that minibuses for workers would be provided to facilitate journeys to/from key towns and cities where significant numbers of people could originate, reducing the total number of car journeys. In addition, a realistic proportion of car sharing would be expected, also reducing the number of car journeys.

ExQ1	Respondent	Question	Applicant's Response
			The number of construction delivery movements required has been calculated based on the known amount of materials required by the Scheme over the planned 24 month construction period. The delivery vehicle movements are further explained in section 7.3 and 7.4 of the Transport Assessment **[APP-112]**. It is anticipated that there will be up to 25 HGVs delivering across the Site daily between construction months 1-18. These deliveries will be directed to the Compounds and distributed among them during the construction period. Following deliveries from HGVs to the Compounds, tractors with trailers will deliver the loads to other locations around the Solar PV Site and Grid Connection Corridor. It is anticipated that for one HGV delivery, two tractor-trailer deliveries will be needed to move the loads across the Site. It is anticipated that there will be up to 50 daily tractor-trailer movements during the peak construction period between month 1-18.
Q12.0.9	The Applicant	ES13.7.10 and Table 13-18. Link 6 would experience a greater increase in traffic movements than link 5. Please clarify why the additional hourly traffic numbers are considered to be 'low' (ES13.7.10) or 'medium' (Table 13-18).	The Applicant is in agreement that reference should also be made to Link 6 in relation to it having similar hourly construction traffic to Links 5 and 15 and this is an omission from paragraph 13.7.10.
Q12.0.10	The Applicant	ES13.7.14. Please provide further justification for it to be 'considered' that there is sufficient capacity on the network	This consideration is on the basis that future predicted 2025 base flows on Links 2, 3 and 6 are very low (207, 289 and 148 daily two-way trips respectively). With the total number of daily two-way construction vehicles added to the base flows, (Link 2, 207 + 33 = 237, Link 3, 289 + 73 = 362 and Link 6, 148 + 203 = 351) the total number of vehicles would likely not exceed the carrying capacity of the roads. In addition, it should be noted that the Framework Construction Traffic Management Plan **[APP-113]** includes a number of embedded mitigation measures that are specifically aimed at reducing the impacts of construction vehicles, especially during the peak hours. For example, promotion of car sharing, the use of minibuses, specific vehicle routing and delivery timing restrictions.
Q12.0.11	The Applicant	ES13.7.20 states that the sensitivity of link 15 is very low whereas Tables 13-5 and 13-18 put it at low. Please clarify the position and comment on whether a low sensitivity would affect your finding of a minor/negligible effect. Please review any inconsistency with ES Table 13-19.	The Applicant has reviewed the ES chapter and notes that paragraph 13.7.20 refers to Link 5, not Link 15. The sensitivity and significance of effects quoted for this link therefore remain valid.
Q12.0.12	The Applicant	ES13.7.22 and ES13.7.23. Please provide further justification for the assumption that the pattern of safety issues on the identified links does not suggest that the issues would be aggravated by construction traffic movements, including taking into account the width and character of the roads.	By way of clarification, section ES13.7.22 **[APP-065]** incorrectly refers to Section ES13.7 **[APP-065]** for details of baseline accidents. This should refer to sections ES13.5.35 to ES13.5.53**[APP-065]** (Road Safety). In terms of the existing highway safety situation, Links 2, 3 and 6 have no recorded incidents, therefore can be ruled out. Link 13 only has one recorded incident, which was attributed to human error, therefore no common causality or pattern can be established. In addition, these roads are wide enough (with the use of passing places on single track roads) to allow vehicles to pass each other with adequate forward visibility. Please refer to the response to Q12.0.6 for further details in relation to Links 5 and 15.

ExQ1	Respondent	Question	Applicant's Response
Q12.0.13	The Applicant	ES13.7.25 to 13.7.31. LEMP Section 6.1 sets out a range of landscape maintenance activities to be undertaken during the operational phase (some of which would be more intensive in the first 12 months of operation). Please clarify how the traffic movements associated with these activities have been taken into account in the operational phase assessment.	Traffic movements associated with landscape maintenance activities are included within the numbers stated in section ES13.7.25 **[APP-065]**. Section ES13.7.25 to 13.7.31 **[APP-065]** demonstrates that traffic movements associated with the operational phase will be minimal, and resulting operational effects will be negligible. As such, a quantitative analysis has not been required.
Q12.0.14	The Applicant	ES13.10.5. Please clarify why some of the cumulative schemes listed in ES Appendix 17.1 Shortlist of Cumulative Schemes [APP-125] are not considered in ES Table 13-24.	The shortlist provided within Table 13-24 of the ES chapter **[APP-065]** is a filtered version of that provided within ES Appendix 17.1 **[APP-125]**. Schemes were removed from the updated list provided in Table 13-24 of the ES chapter if developments were; • Too small to have a measurable contribution to a cumulative effect; • Stated to be at the pre-application stage (either EIA scoping or EIA screening), therefore lacking certainty whether they will come forward, or be sufficiently progressed to be consented and at construction stage at the same time as EYSF, i.e. construction phases would be unlikely to overlap; and • Unlikely to have a geographical or temporal overlap. As discussed in section 13.10 **[APP-065]**, the future traffic baselines predicted for the 2025 assessment period have been calculated using TEMPro growth factors, which include a forecast of local development growth and attempts to capture growth attributed to these other developments presented in Table 13-24 **[APP-065]**. The cumulative schemes have therefore already been captured in the future baseline. The cumulative assessment of other developments identified in Table 13-24 is likely to therefore overestimate the cumulative effects.
Q12.0.15	The Applicant	What consideration has been given to the use of a planning agreement or similar mechanism to coordinate and control the cumulative effect of the construction traffic movements generated by the application proposal and other schemes in the area (see EN-3(24) paragraphs 2.10.139 to 2.10.143).	The cumulative assessment presented at 13.10 of the ES **[APP-065]** demonstrates that the impact of cumulative development will not change the significance of effects reported in Chapter 13 of the ES. Therefore, additional mitigation as a result of cumulative effects is not required. Thus a planning agreement or other securing mechanism is not considered necessary. The Framework CTMP provides the mechanism to manage and minimise the effect of construction traffic generated by the Scheme. The detailed CTMP which is secured by requirement 13 Schedule 2 will be prepared in accordance with the Framework CTMP. This will need to be reviewed with the relevant Highways Authorities and Network Rail prior to being approved. The detailed CTMP will include mechanisms for monitoring, reporting and review by the Highways Authority. The Highways Authority will have strategic oversight of the network and planned development. The Highways Authority will therefore have the ability to request measures for co-ordination and managing cumulative effects at the appropriate time. The Applicant will work with the Highways Authority to achieve this coordination if this is required. The Applicant is also in ongoing discussions with other Schemes coming forward in the vicinity of the Scheme such as National Grid's England Green Link 2 with the aim of achieving a coordinated approach where construction activities including use of the local highway network are likely to occur.

ExQ1	Respondent	Question	Applicant's Response
Q12.0.16	The Applicant	A considerable number of RRs express concern regarding damage to highway verges and associated utility services from construction vehicles, particularly given the narrowness of some roads in the area. Please comment on this concern and set out any measures to avoid or mitigate such damage.	With regard to the condition of the roads, pre and post construction road condition surveys will be undertaken at identified locations in consultation with the relevant Local Highway Authority. This is included at paragraph 5.2.3 of the Framework Construction Traffic Management Plan (CTMP) **[APP-113]** and will be secured via the detailed CTMP which will need to be in substantial accordance with the Framework CTMP in accordance with requirement 13. Schedule 2 of the draft DCO **[AS-008]**. Any damage identified through this process would be repaired and the condition of the highway including verges reinstated to its original condition.
Q12.0.17	The Applicant	A number of RRs suggest that, rather than routing traffic through Newsholme, access could be taken directly from the A63. Please provide further justification for the routing of construction traffic through Newsholme.	The Applicant can confirm that construction vehicles requiring access to Compound B will do so via the B1228 and Wood Lane in order to prevent construction vehicles using Rowlandhall Lane via the village of Newsholme. Subsequently, no traffic will travel through the village of Newsholme during construction. The Framework CTMP has been updated to specify this commitment, and is submitted at Deadline 1.
Q12.0.18	The Applicant	The Canal and River Trust [RR-036] suggests that the River Ouse has the potential to be used for the transport of construction materials to the site. EN-1(24) paragraph 5.14.12 supports the use of environmentally sustainable alternatives to road transport, including inland waterways. Please set out what consideration has been given to the use of the River Ouse for the transport of construction materials including abnormal indivisible loads (see EN-1(24) paragraph 5.14.16.	The use of nearby ports (such as Goole) to transfer materials required for the Scheme was considered by the Applicant at an early stage of the Scheme development. However, the likely origin of the majority of materials would not make use of these port locations feasible logistically. Also the creation of jetty facilities on the River Ouse would be required to provide waterborne access closer to the Solar PV Site and this would still require HGV movements on the local highway network to move materials from water to the Solar PV Site. The Framework Construction Traffic Management Plan **[APP-113]** has been developed to consider measures seeking to minimise the impacts and disturbance caused by construction traffic including abnormal indivisible loads on the local road network.
13.	**Water Environment**		
13.0	**General water environment**		
Q13.0.2	The Applicant	ES9.3.13. (a) Please provide an update on the request for information on River Ouse and Derwent flood defences. (b) Does this information have any implications for the design of the HDD?	The latest correspondence from the EA dated 4th April 2024 in response to the Applicant's request on 16th October 2023 for details of information regarding the EA's flood defence assets confirms that the EA does not have any as built or specific information regarding the flood embankments in the Ouse Catchment which may potentially be affected due to their age. Regarding the Esk and Derwent catchment the EA confirm that the Grid Connection Corridor would be on the dry side of the defences here and will not interfere with the embankment. Mitigation measures for trenchless crossings of watercourses are stated within the Framework CEMP **[APP-238]** and secured by a requirement in Schedule 2 of the Draft DCO **[AS-008].** This includes the commitment from the Applicant to seek information from the Environment Agency on the construction details of the flood defence embankments that may need to be crossed. This will inform the approach for directional drilling beneath the Rivers Ouse and Derwent and associated flood defences. The Applicant will continue to engage with the Environment Agency throughout the detailed design stage of the Scheme and in accordance with the protective provisions set out in Schedule 14 of the draft DCO **[AS-008]**.

ExQ1	Respondent	Question	Applicant's Response
Q13.0.3	The Applicant	ES9.4.22. Where would the water for the Intermediate Bulk Containers come from and how would it be delivered to the site?	This water for the Intermediate Bulk Containers will either be from a licensed water source which may include the onsite connection to the mains at Johnsons Farm or purchased from a commercial enterprise, whichever is the most practicable based on the availability at the time. Where this water is sourced outside the Site it will be delivered to the Site by road as discussed in Table 2-1 of ES Chapter 2: The Scheme **[APP-054]**.
Q13.0.4	The Applicant	ES9.4.58 draws a distinction between receptor sensitivity and receptor importance. While recognising that distinction, should the sensitivity of the receptor still be taken into account, perhaps in the magnitude of impact criteria (ES Table 9-4)?	The significance of effects criteria used in ES Chapter 9 **[APP-061]** are based on the guidance and criteria outlined in the Design Manual for Roads and Bridges (DMRB) LA113 Road Drainage and the Water Environment and LA104 Environmental Assessment and Monitoring, adapted to take account of hydromorphology. As described in the ES paragraph 9.4.58 **[APP-061]**, the receptor classification criteria focuses on receptor importance and not sensitivity as the former is more appropriate to the water environment discipline. While the adopted approach was originally designed for road infrastructure projects, this methodology is suitable for use on any development project, being a robust and well tested method for predicting the significance of effects. The criteria have been successfully used on numerous DCO projects previously, including several solar energy projects and are thus considered robust and the most appropriate framework for the water environment impact assessment.
Q13.0.6	The Applicant	ES9.6.11. Given the configuration of the site, there would be numerous points of access to and crossing from the public highway. How would mud deposits from vehicles be controlled in these circumstances?	ES Chapter 9 (paragraph 9.6.11) **[APP-061]** indicates that mud deposits will be controlled at entry and exit points to the Site using wheel washing facilities and/or road sweepers operating during earthworks activities or other times as required. Furthermore, equipment and plant are to be washed out and cleaned in designated areas within the temporary construction Compounds or at Johnson's Farm, where runoff can be isolated for treatment before disposal. Numerous other measures are also outlined for management of construction site runoff within ES Chapter 9 **[APP-061]**. The mitigation measures relating to management of construction site runoff are secured within the Framework Construction Environmental Management Plan **[APP-238]**. Schedule 2 Requirement 11 of the draft DCO **[AS-008]** requires that a detailed CEMP is submitted and approved by the relevant planning authorities, and that it is 'substantially in accordance with the Framework Construction Environmental Management Plan and must be implemented as approved'. The detailed CEMP will be supported by a Water Management Plan (WMP) providing greater detail regarding the mitigation to be implemented to protect the water environment from adverse effects during construction.
Q13.0.7	The Applicant	ES9.7.4 and ES state that the Water Framework Directive (WFD) reportable Fleet Dyke watercourse would be crossed by the grid connection cables. However, that does not appear to be consistent with ES Table 9-6 page 9-75 which states that it would be crossed by the interconnecting cables. Moreover, it is not clear from ES Figure 9-1 where, in relation to the GCC and substations, the reportable Fleet Dyke rises and ES Figures 9-1 and 9-2 show different routes for the watercourse between Area 1d and the southern boundary of Area 2a. ES Figure 9-2 appears to show it running alongside the GCC. Please clarify the position and provide details of the Fleet Dyke cable crossings and its relationship to the GCC	There is a discrepancy over the mapping of the WFD reportable Fleet Dike catchment (tributary of the Ouse) water body (WFD ID: GB104027063630) on the Environment Agency Catchment Data Explorer website and the naming of a tributary as Fleet Dyke/Dike on Ordnance Survey (OS) mapping (OS Open River and OS Mastermap Water network layers), which is not part of the WFD reportable water body. This appears to have caused the confusion described in the Q13.0.7. The WFD reportable Fleet Dike catchment (tributary of the Ouse) water body is designated from adjacent to Webbwood House at NGR SE 74581 34295, from where it flows west to meet Solar PV Area 2a adjacent to Waterloo Farm. The WFD reportable reach then follows the perimeter of Solar PV Area 2a, flowing south and then west around along the southern margin of Solar PV Area 2a, and then continuing generally west to Wressle Clough and its confluence with the River Derwent. This WFD reportable reach is shown in Figure 9-1 of the ES **[APP-151]**. There are no crossings of

ExQ1	Respondent	Question	Applicant's Response
			this WFD reportable water body identified for the Grid Connection Corridor. However, there would be a crossing for the Interconnecting Cable Corridor at NGR SE 72996 33519. OS mapping nomenclature differs slightly to the WFD reportable reach, with a tributary (drain) of the reportable reach being named as Fleet Dike. This drain rises adjacent to the road junction of Willitoft Road and Street Lane at NGR SE 73820 33108, and flows southwest alongside Willitoft Road to NGR SE 73667 32910, from where it flows northwest to meet the WFD reportable water body on the southern perimeter of Solar PV Area 2a. Fleet Dike as labelled on OS mapping can be seen in Figure 9-2 of the ES **[APP-152]**. It is this non-WFD reportable reach of Fleet Dike that would be crossed by the Grid Connection Corridor at NGR SE 73418 32679 (see Table 9-17 of ES Chapter 9). It is acknowledged that Fleet Dike appears to have two different courses on Figure 9-1 and Figure 9-2, and this has arisen due to the use of the WFD and OS mapping layers in the two separate figures, with a discrepancy between the two as described above. In summary, the WFD reportable Fleet Dike catchment (tributary of the Ouse) water body would be crossed by the Interconnecting Cables at NGR SE 72996 33519. A tributary of this watercourse (also known as Fleet Dike on OS mapping but not a WFD reportable reach) would be crossed by the Grid Connection Corridor at NGR SE 73418 32679.
Q13.0.8	The Applicant	ES9.7.16, ES9.7.17, ES9.7.18 and ES 9.7.21. (a) Please clarify the distinction made between watercourses directly impacted by construction works (ES9.7.16) and watercourses not directly worked on, even when this is said to include open span crossings (ES9.7.17) and open cut installations are said to be 'intrusive' (ES9.7.18). (b) Please review the findings in ES9.7.17 and ES9.721 in the light of your response to EQ13.0.7.	Watercourses directly impacted by construction works would be those where intrusive in-channel works are required. In total, there are expected to be 36 open-cut watercourse crossings as a worst case (11 for the Grid Connection Cable and 25 for either the onsite electrical cabling or Interconnecting Cabling) as outlined in Table 9-17 of the ES Chapter 9 **[APP-061]**. In these cases there will be unavoidable disturbance of the watercourse bed and banks for installation of cables and so this is a potential direct impact to the watercourse. Where there are works in close proximity to a watercourse but there is no intrusive disturbance to the watercourse channel then potential impacts are considered indirect, as they are more likely to relate to runoff of sediment laden water or spillages from the surrounding catchment. Installation of open span bridge crossings would fall into this category as the structure would be installed over the watercourse without any requirement to directly disturb the channel. Nonetheless, there is a potential for indirect impacts from runoff of sediments (e.g. from disturbance in the riparian areas where plant would be operating) or accidental spillages of fuels and chemicals. To summarise, 'open cut' cable installations across watercourses are intrusive and so have potential for direct impacts to the channel, whereas installation of 'open span' watercourse crossings are non-intrusive and impacts would be considered indirect. As such, the Applicant considers that the assessment findings outlined in ES9.7.17 and ES9.7.21 are valid and do not require further revision.
Q13.0.9	The Applicant	ES9.7.25. Please clarify what is meant by 'no continuous foundations' having regard to statements elsewhere that strip foundations may be used for Field Substations/ Field Station Units (eg ES9.6.47) and that the foundation type for the GC substations has not been specified.	The 'no continuous foundation' statement in paragraph 9.7.25 relates to typical pile foundations used for the Solar PV mounting structures which are generally thin and spaced out, and therefore not a continuous strip across the location. However, shallow foundations of up to 2 m have been assumed to be associated with the hardstanding areas of the site (e.g. the Field Substations / Field Station Units) which could include strip foundations. For the Grid Connection Substation foundations in Solar PV Area 1c, foundations will depend on specific ground conditions that require further investigation at detailed design, but as a worst case it was assumed that screw piles of up to 18 m depth could be used but these will also by typically spaced out.

ExQ1	Respondent	Question	Applicant's Response
			There may be potential to encounter groundwater in the superficial deposits where there are Solar PV Panel foundations (discrete not continuous) as well as cable trenching activity and Field Substations (with foundation depth of up to 2m). However, given that these superficial deposits are largely clayey with low permeability there would not be expected to be significant groundwater flows and thus any impact was assessed as negligible in the ES. Should any deeper foundation be required in the Sherwood Sandstone, then no impedance of groundwater flow would be likely given the high permeability and laterally extensive nature of the aquifer compared to the extent of the discrete foundations. Solar PV Area 1c where deeper piles of up to 18 m may be used is underlain by Mercia Mudstone. Any deeper foundations that may be required here for the Grid Connection Substations (as will be determined based on further investigation of ground conditions) would not be expected to encounter significant quantities of groundwater due to the low permeability nature of the secondary aquifer. Overall, the assessment considered that any impact on groundwater flow would result in neutral effects (not significant).
Q13.0.10	The Applicant	ES9.7.60. Would material, other than backfilled soil, be used to bed and cover the GCCs? If so, please comment on its effect on groundwater flows.	The majority of material would be backfilled soil, however, some of the cables would be laid in Cement Bound Sand (CBS). This is a dry, weak cement mix that hardens to a firm but crumbly base from the moisture in the soil. Installation depths for cables would primarily be in the range of 1300-1500 mm depth. As such, the use of CBS material would predominantly be within the superficial deposits which are generally clayey with low permeability across the study area. As such, there are not expected to be significant groundwater flows through these deposits. Given that limited groundwater flows are expected at these target depths, and that the proposed backfill material will mainly be around the linear route of the cable trench, it is considered unlikely that use of this material will result in any significant disruption of groundwater flows within the shallow deposits across the area. Any disruption will be very localised and unlikely to be significant at the scale of the wider groundwater body.
Q13.0.11	The Applicant	ES9.7.65 refers to a 30m buffer between the HDD send and receive pits for the River Ouse and River Derwent crossings and the water edge, whereas ES9.6.18 and ES Table 22 refer to a 16m distance between the pits and the landward toe of the flood defences in these locations. Please clarify the difference between these distances.	As described in paragraph 9.4.9 of ES Chapter 9 **[APP-061]**, the Scheme will be set back from all water features by at least 10 m to create a buffer zone (except where crossings are required), and 30 m in the case of the River Derwent, River Ouse and unnamed drainage ditch DE53. There would also be a buffer of 16 m from the landward toe of all flood defences. This would mean that where necessary the overall buffer may be greater than 30 m where the requirement for 16 m from the landward toe of the flood defence extends the overall buffer from the watercourse to greater than 30 m. These buffers also apply to HDD send and receive pits. These buffers are set out in the Framework CEMP and will be secured by a detailed CEMP required by requirement 11 of the draft DCO **[AS-008]**. The inclusion of theses buffers reduces the risk of pollutants entering the watercourse directly, whilst also providing space for mitigation measures (e.g. fabric silt fences) where they are required and maintaining access (e.g. for the IDB).
Q13.0.12	The Applicant	ES9.7.87. Please comment on the need for additional hardstanding areas for access, parking, storage and the like at the Johnson Farm hub and, if needed, how it would be drained.	The development of the operations and maintenance hub at Johnson's Farm is not expected to result in a change in the current drainage behaviour of the existing site once built as no increase in impermeable area is proposed to the existing areas of hardstanding.

ExQ1	Respondent	Question	Applicant's Response
Q13.0.13	The Applicant	A number of RRs refer to the potential for the scheme to damage existing land drainage systems and thereby increase the risk of flooding. EN-3(24) paragraph 2.10.86 also requires proposals to avoid the need to impact on existing drainage. Please set out any investigation of existing land drainage in areas where works would take place and any precautions proposed to ensure its protection.	Mitigation measures are included in the Scheme design which will contribute to protection of land drainage systems. Notably, there is a 10 m buffer required around all watercourses (with the exception of where watercourse crossings are required), and a 30 m buffer in the case of the River Ouse, River Derwent and drain DE53. The Solar PV Panels are raised above ground and are on tracking system, meaning that rainfall will not be solely focused on a single drip line from the panels but is more widely dispersed. While vegetation establishes beneath panels, the ground will be raked in line with contours to encourage retention and infiltration. Once established, vegetation beneath the panels will disperse dripping water and prevent defined drip lines from forming. The impermeable area will remain largely consistent with the pre-development state as Solar PV Panels are elevated above ground. Drainage will therefore be as per the existing situation in these areas, but with less potential for defined runoff channels to form. The Framework Surface Water Drainage Strategy **[APP-098]** provides further detail regarding Scheme drainage. Consultation with the Ouse and Humber Drainage Board concluded that only Solar PV Area 1c, which contains the Grid Connection Substations, had a potential to impact on surface water runoff and needed to be considered in the Framework Strategy. For this area, appropriate attenuation channels have been proposed, sized to contain the 100-year (+ climate change) design event, and then infiltrate to ground. A detailed Surface Water Drainage Strategy will be provided post-consent following the detailed design of the Grid Connection Substations and informed by infiltration testing, as secured through the draft DCO **[AS-008]**. The Flood Risk Assessment **[APP-097]** has considered the potential for an increase in flood risk to and from the Scheme, from all sources. It was concluded that the Scheme meets all requirements of the NPS EN-1 and NPPF with respect to flood risk and will remain safe throughout its lifetime with regard to flood risk, taking into account mitigation measures that are included in the Scheme.
Q13.0.14	The Applicant	EN-1(24) paragraph 5.8.37 requires proposals having drainage implications to comply with any National Standards published by Ministers under paragraph 5(1) of Schedule 3 to the Flood and Water Management Act 2010. Please set out how the proposal meets this requirement.	The Applicant believes that National Standards published by Ministers under Schedule 3 to the Flood and Water Management Act 2010 has not yet occurred but it is expected that National Standards will be published this year. These will require sustainable drainage to be incorporated into new development and is supported by standards for developing adoptable drainage that can be handed over to the relevant water company for ongoing maintenance. The technical drainage solutions proposed by the Scheme follow typical good practice industry guidance, including Water Research Centre (WRC) Sewers for Adoption 7th Edition and CIRIA C753 The SuDS Manual. Further detail is provided within the Framework Surface Water Drainage Strategy **[APP-098]**. A detailed Surface Water Drainage Strategy will be provided post-consent, as secured through the draft DCO **[AS-008]**. This will take account of any updated National Standards that are required at that point in time. The Framework Surface Water Drainage Strategy **[APP-098]** has also been developed in accordance with National Policy Statements (NPS EN-1 and EN-3), the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG). It also takes account of local planning policy and was developed in consultation with Ouse and Humber Drainage Board. As discussed in response to Q13.0.15 below, the Applicant will have responsibility for the maintenance of the Sustainable Urban Drainage Systems (SuDS) proposed as part of the Scheme.

ExQ1	Respondent	Question	Applicant's Response
Q13.0.15	The Applicant	EN-1(24) paragraphs 5.8.38 and 39 refer to the operation and maintenance of sustainable urban drainage systems, including identifying the responsible body. Requirement 9 of the dDCO states that any approved surface water drainage strategy must be maintained throughout the operation of the authorised development. However, neither the framework Surface Water Drainage Strategy [APP- 098] or the Operational Environment Management Plan (OEMP) [APP-239] provide substantive information on how the surface water drainage system would be maintained. Please clarify the proposals for maintenance of the system, including who would have responsibility.	The Applicant would have responsibility for the maintenance of the Sustainable Urban Drainage Systems (SuDS). The proposed SuDS for Solar PV Area 1c consists of attenuation storage ditches that hold all runoff from the impermeable areas, as shown and described in The Framework Surface Water Drainage Strategy **[APP-098]**. Maintenance requirements will typically consist of inspection and periodic sediment removal. This would follow best practice maintenance approaches outlined in CIRIA C753 The SuDS Manual. A detailed Surface Water Drainage Strategy will be provided post-consent, as secured through the draft DCO **[AS-008]**, and this would include full detail of maintenance requirements. The Framework Surface Water Drainage Strategy **[APP-098]** and the Framework Operational Management Plan **[APP-239]** have been updated to secure the fact that the Applicant would have responsibility for the maintenance of the SuDS. These updated documents have been submitted at Deadline 1 of the Examination.
Q13.0.16	The Applicant	Please provide details of any consultation with the Marine Management Organisation regarding the terms of the Deemed Marine Licence proposed at Schedule 15 of the dDCO (see EN-1(24) paragraph 5.16.4).	Consultation Report Appendix P2: Section 42(1)(aa) Responses to Statutory Consultation and the Applicant's responses **[APP-042]** states that the Marine Management Organisation were contacted via email on 18/8/2022 regarding the potential trenchless crossing beneath the River Ouse. A response was received on 14/10/2022 stating "As long as the tunnel boring is done, so it at no point breaches the surface, while in the marine area; it would not require an MMO licence. As long as it remains below the surface, it would be considered to be beyond our remit & authority". The Applicant notes that the availability of a marine licence exemption is to be considered at the relevant point in time (i.e. construction of the Scheme) and that it is for the Applicant to satisfy itself on the availability of an exemption. Therefore, to provide certainty that the works can be carried out, and to ensure the delivery of an NSIP is not unnecessarily delayed by a separate licence application having to be made in the future, the Applicant has included a deemed marine licence which will authorise the marine licensable activities to the extent that they are not exempt. The Marine Management Organisation were consulted by the Applicant in accordance with Section 56 of the Planning Act 2008 following the acceptance of the application. The Marine Management Organisation has not made a relevant representation and not therefore registered as an interested party. No further consultation with the Marine Management Organisation regarding the terms of the Deemed Marine Licence proposed at Schedule 15 of the draft DCO **[AS-008]** has been undertaken by the Applicant.
13.1	**Flood risk**		
Q13.1.1	The Applicant	Flood Zone 3 (FZ3) areas identified in ES Figure 9-4 [APP-154] are not distinguished as either FZ3a or 3b. The FRA [APP-097] describes areas within the Order Limits which are within FZ3b and Table 9-12 (Flood Risk from Tidal and Fluvial Sources – Solar PV Site) of ES Chapter 9 also refers to FZs 3a and 3b. Please provide a figure which shows the location and extent of FZ3a and FZ3b within the red line boundary	Hydraulic modelling was undertaken to further understand flood risk to the Solar PV Site. An additional figure has been prepared (see Appendix B) to show the location and extent of Flood Zone 3a (based on Environment Agency data) and Flood Zone 3b (based on the 3.3% Annual Exceedance Probability modelled event) across the Solar PV Site. It should be noted that Flood Zone 3b shown on the figure only represents areas which were covered by the hydraulic model. The extent of the model was considered suitable for assessing fluvial flood risk at locations where Solar PV development was being proposed.
Q13.1.2	The Applicant	Notwithstanding that the FRA appears to address the worst case of the GCC being in FZ3b, please identify the areas of the	ES Figure 9-4 **[APP-154]** shows that the majority of the GCC crosses areas of Flood Zones 2 and 3a according to Environment Agency data. The hydraulic modelling undertaken for the Scheme does not include the GCC area, however according to Appendix B Figure 11 of the Selby District

ExQ1	Respondent	Question	Applicant's Response
		GCC in FZs 3a and 3b according to other data sources, such as, for example, relevant Council Strategic FRAs.	Strategic Flood Risk Assessment published in 2015, the GCC is located within areas of Flood Zone 3b where it crosses the River Ouse.
14.	**Other Environmental Topics**		
14.0	**Air Quality**		
Q14.0.1	The Applicant, NE and LPAs	ES Table 16.1 page 16-6. Has the need for further air quality monitoring been discussed and, if so, what was the outcome?	Baseline air quality monitoring by the Applicant has not been proposed or requested by the Councils following Scoping or Statutory Consultation. The levels of construction traffic (as presented in **Chapter 13: Transport and Access, ES Volume 1 [APP-065]**] are sufficiently low that it can be concluded with confidence that the atmospheric emissions associated with these vehicles would not be capable of having a significant effect at any air quality receptor. The traffic flows are below the threshold for assessment identified by the Institute of Air Quality Management. The secondary data available in the area is therefore considered adequate for the purposes of assessing the impacts of the Scheme on air quality. Table 16-4, **Chapter 6: Other Environmental Topics [AS-016]** identities that a Dust Management Plan will be prepared post consent which will include monitoring of dust deposition prior to construction, to provide an accurate dataset against which to measure construction dust. This is secured by requirement 11 of the draft DCO **[AS-008],** which requires a Construction Environmental Management Plan (CEMP) to be produced substantially in accordance with the **Framework CEMP [APP-238]**, which commits to Dust Management Plan and provides an outline of the proposed monitoring in Table 12.
Q14.0.2	The Applicant	ES Table 16.1 page 8. Figure 16-1 does not show the location of human and ecological receptors as requested by the Planning Inspectorate (PINS). Although designated ecological sites are shown separately on Figures 8-1 and 8-2, in the absence of a plan showing both, it is difficult to relate the air quality study area boundaries to the ecological designations. Please provide a plan showing all of these features.	Figure 16-1 has been updated to address this comment and has been submitted at Deadline 1. The revised Figure 16-1 shows the location of the ecological receptors in relation to the study area boundaries. The potentially affected properties can be identified on the basemap of the figure and are located as follows based on proximity to the order limits and site access roads. The representative receptor locations relevant to the air quality study are as illustrated on Figure 11-1 **[APP-211]**: • Properties on Spaldington Lane (R21) • Properties on A614, south of Spaldington Lane junction (R33) • Properties on Wood Lane (R7, R24) • Properties on Willitoft Road (R51) • Properties on Ings Lane (R52) • Properties on B1228 (R6) • Properties on Rowlandhall Lane (R34) • Properties on A63, Babthorpe (R42)
Q14.0.3	The Applicant	ES16.2.18 states that ecological sites 'will be screened for sensitivity to construction dust and nitrogen deposit'. When will	The construction dust risk assessment in Table 16-8, **Chapter 6: Other Environmental Topics [AS-016]** considers the potential for construction dust risks and mitigation. The potential for nitrogen deposition risks forms part of the distance-based screening approach for emissions from

ExQ1	Respondent	Question	Applicant's Response
		this take place and how will the results be incorporated into the air quality assessment and mitigation proposals?	road traffic. Figure 16-1 Revision 01 (submitted as part of Deadline 1) illustrates that all of the national and international designated ecology sites are more than 200m from an affected road link and therefore significant effects from road traffic emissions are unlikely to occur (given that the Institute of Air Quality Management guidelines (Ref. 16-13 in **[AS-016]**) suggest impacts beyond this distance are unlikely from dust and vehicle emissions).
Q14.0.4	The Applicant	ES16.2.69 and Table 16-10. Please expand on how the mitigation measures in Tables 16-4 and 16-5 would result in no significant effects.	Mitigation measures outlined in Tables 16-4 and 16-5, **Chapter 6: Other Environmental Topics [AS-016]** are industry standard measures which have a long track record of delivering effective control of emissions at source for similar activities across the UK. The adoption of these measures would be delivered via the Framework Construction Environmental Management Plan **[APP-238]**, which is secured by requirement 11 of the draft DCO **[AS-008]**. The Institute of Air Quality Management guidance (Ref. 16-13 in **AS-016**) is clear that significant effects will not occur following the implementation of these measures.
Q14.0.5	The Applicant	ES16.2.77. Please review the approach to the availability of information available for cumulative schemes. For example, both the consented Drax Carbon Capture with Storage DCO and the Drax Re-power DCO ESs include a quantitative Air Quality assessment and identify construction traffic routes. Please update the availability of information on other cumulative scheme currently in the planning approval process.	Traffic Flows on road links potentially affected by the Scheme and developments at the Drax site are considered in ES13.10.6, Data on traffic flows of cumulative schemes (where available and relevant) will be reviewed, and confirmation regarding whether any additional information pertinent to the cumulative air quality impact assessment is required will be provided at Deadline 2.
14.1	**Glint and Glare**		
Q14.1.1	The Applicant	ES16.3.4. Please comment on the potential for local changes in the orientation of the solar panels at the detailed design stage to affect the Glint and Glare Assessment ES Appendix 16-2 [APP-122].	The solar panels are orientated in a north-south direction and rotate east-west along a single axis to maximise solar gain throughout the day and during the year (i.e. they will rotate east to west to track the movement of the sun). The panels will have a maximum tracking angle of 60 degrees and the axis tilt will vary throughout the site depending on the lay of the land. For example, when the sun is lower on the horizon (dusk/dawn) the panel position will be nearer vertical, whereas when the sun is high in the sky (midday) the panel position will be near horizontal. The model within the Glint and Glare Assessment (ES Appendix 16-2 **[APP-122]**) has ensured that the entire tracking range of the solar panels has been assessed and the panel details are to remain the same through detailed design stage. Table 1 of the Outline Design Principles Statement **[APP-235]** secures the parameters of the tracker solar panels to ensure the model is not exceeded. The detailed design of the Scheme must be in accordance with the Outline Design Principles Statement in accordance with Requirement 5(2) of Schedule 2 of the draft DCO.
Q14.1.2	The Applicant	ES16.3.14. Please provide any supporting evidence or precedent for the magnitude of impact criteria used in this paragraph.	In the absence of specific standards, criteria for road, rail and PRoW receptors have been based on the Federal Aviation Authority's (FAA) Interim Guidance (FAA (2013), Interim Policy, *FAA Review of Solar Energy System Projects on Federally Obligated Airports*) that explains that there should be no potential for glare (glint) or "low potential for after-image" (Green Glare) along the final approach path for any existing or future runway landing thresholds, as shown by the approved layout plan (ALP). The final approach path is defined as 2 miles from 50 feet above the landing threshold using a standard 3-degree glide path. This indicates that Yellow Glare (potential for after-image) would be a **High** impact, whilst green Glare would be a **Low** impact.

ExQ1	Respondent	Question	Applicant's Response
			The impact criteria set out within the Glint and Glare Assessment **[APP-122]** has been used on numerous solar projects totalling over 2GW across the UK and Ireland to date. Projects include the Longfield Solar Farm NSIP, where the impact criteria set out was accepted by the Examining Authority. Furthermore, this impact criteria has stood up to the test of numerous peer reviews that have been completed by councils across the UK and Ireland.
Q14.1.3	The Applicant	Glint and Glare Assessment. Please expand on how the modelling used in this assessment provides results for impacts throughout the day, year and for the range of tilt angles of the solar panels (see EN-3(24) paragraph 2.10.105).	The Glint and Glare Assessment **[APP-122]** uses the Sandia Laboratory Solar Glare Hazard Analysis Tool (SGHAT) to assess the impacts. This is recognised as the industry standard model to use when assessing glint and glare impacts. The model calculates the position of the sun at one-minute intervals across a typical year and assesses the glare impact for each minute of a typical year. Given the panel details are single axis tracking, they are input as such into the model which ensures the panels are modelled to follow the suns movement throughout the day (+- 60 degrees from the horizontal), this therefore captures the potential glare impacts throughout the day, year and the full range of tracking angles of the solar panels. In this instance there were **no impacts** upon any ground-based receptors (residential, road, rail and PRoW) and only **Low** impacts upon aviation receptors.
14.3	**Major Accidents and Disasters**		
Q14.3.1	The Applicant	ES Table 16-18 pages 16-82, 83 and 85 advise that the 'Applicant is in contact' with the owners of major pipelines crossing the site, that 'exact routings and information on appropriate clearances will be obtained to inform the detailed design of the Scheme' and that indicative plans have been provided. (a) Please provide an update on these consultations. (b) What degree of accuracy can be placed on the positions of the Major Accident Hazard (MAH) pipelines shown on ES Figure 2-3 [APP138]?	It is understood that the ExA is referring to buried gas pipelines that are illustrated on Figure 2-3 **[APP-138]**. This is based on information verified by the owners of the pipeline. The Applicant has provided a Statement of Common Ground (SoCG) as part of the Deadline 1 submission with the pipeline owner, which confirms dialogue is ongoing between the parties to agree a form of protective provisions. The Applicant has proposed protective provisions for the benefit of gas undertakers in the standard form of Part 1 of Schedule 14 of the draft DCO which operate to protect NGT's apparatus. Notwithstanding, the Applicant is in discussions with NGT regarding a bespoke form of protective provisions to seek to address its concerns. The Applicant is confident that agreement will be reached with National Gas Transmission at an early stage of the Examination. The mapped pipeline location should be accurate to within +-1m, allowing for inaccuracies that occur from using differing mapping scales and local ground movement. The precise location will be mapped prior to construction and the Framework CEMP **[APP-238]** (Table 14) includes a commitment that detailed plans to show the exact route of the pipelines and information on appropriate clearances will be obtained prior to any intrusive works. Table 16 of the Framework CEMP **[APP-238]** states that measures in relation to safe working near buried utilities, particularly gas pipelines, will be in place at all stages of the Scheme, for example mitigation set out in National Grid and Northern Gas Networks guidance documents for third parties working in the vicinity of high pressure gas pipelines and associated installations.
Q14.3.2	The Applicant	ES Table 16-19 pages 16-87 and 88. Please provide an update on discussions with Northern Gas Networks regarding protective provisions and the need or otherwise for a Private Asset Protection Agreement and pipeline crossing deed.	The Applicant is engaged with Northern Gas Networks on a form of bespoke protections in an Asset Protection Agreement. There are only a few outstanding points on these documents and therefore the Applicant is confident that agreement will be reached at an early stage of the Examination.

ExQ1	Respondent	Question	Applicant's Response
Q14.3.3	The Applicant	ES16.5.19 and Scoping Report Appendix B page 283 [APP-073] advise that crime has been scoped out on the basis that the proposal is unlikely to be a target due to its rural location and the low number of exposed targets. However, based on a number of RRs, the risk of crime is a fairly widespread fear because of the rural location and the nature of the equipment. Please provide further details on the vulnerability of the proposal to criminal activity during the operational stage.	The Scheme incorporates fencing and security design measures which will mitigate against the risk of criminal activity. This includes internal facing closed circuit television (CCTV) systems which use infra-red technology avoiding the need for lighting. These will be installed around the perimeter of the operational areas of the Solar PV Site and will be part of the first stage of site preparation works to secure the Site before construction. These measures are described in Chapter 2: The Scheme of the Environmental Statement **[APP-054]**. The Applicant is confident that the Solar PV Site will be secure and will intensify the security arrangements through additional security staff for example should the Site Manager recommend such measures to secure the Solar PV Site. A security appraisal will be carried out by the Site Manager ahead of site preparation works and construction, and again prior to operation. Criminal activity on solar farms is not a common occurrence in the UK.
Q14.3.4	The Applicant	ES16.5.35 is said to provide an assessment of the acceptability of the construction or decommissioning phases in connection with the consultation zones of the MAH sites and pipelines crossing the site. However, paragraphs 16.5.35 to 16.5.39 are mainly concerned with working hours and provide limited assessment of the risks posed to the MAH sites and pipelines by the construction and decommissioning activities. Please expand on this assessment.	The Scheme extends across the consultation zones of two Major Accident Hazard (MAH) sites /installations and three MAH pipelines. As described in the Health and Safety Executive's (HSE) Planning Advice for Developments near Hazardous Installations (PADHI), consultation zones are determined by the HSE following a detailed assessment of the risks and/or hazards of the installation or pipeline. The consultation zones are banded into Inner, Middle and Outer Zones radiating away from the installation or pipeline, with the risks and hazards being greatest in the Inner Zone and hence the restrictions on development are strictest within that zone. As set out in PADHI, to determine whether a development can be located within the consultation zone of a MAH the HSE considers the type of development and its sensitivity, and the zone in which the Scheme lies (Inner, Middle or Outer). When assessing the sensitivity of a development account is taken of the size and nature of the Scheme, the inherent vulnerability of the exposed population and the ease of evacuation or other emergency procedures for the type of development proposed. Consequently, some categories of development (e.g. schools and hospitals) are regarded as more sensitive than others (e.g. light industrial) and the HSE's advice is weighted accordingly. The HSE provides its advice as either 'Do Not Advise Against' 'or 'Advise Against' development. In their statutory consultation response (Table 16-20 of the ES **[AS-016]**), the HSE confirmed that owing to the low number of site staff and visitors at the operational phase, they 'would not advise against' the development of the Scheme. Therefore, the assessment presented in the ES considered that the risks to site staff and visitors due to accidental fire or explosion at an onshore major hazard site is not significant. As HSE's formal advice in respect to the Scheme only considered the operational phase of the solar farm, the assessment presented in the ES followed the PADHI guidance provided for the assessment of the acceptability of the construction or decommissioning phases in connection with the consultation zones of the MAH sites and pipelines crossing the Site. The development type for construction and decommissioning compounds was classed as DT1.1 – Workplaces (predominantly nonretail), providing for less than 100 occupants in each building and less than three occupied storeys. The sensitivity level of the development (the construction and demobilisation operations) was assessed as Level 1 – based on the construction staff representing 'a 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 during construction or decommissioning and 'members of the public will not be present or will be present in very small numbers and for a short time'.

ExQ1	Respondent	Question	Applicant's Response
			It is noted that the peak construction workforce (in 2025, when construction activities are likely to include construction of the Grid Connection Substations, Grid Connection and Interconnecting Cabling, and building of solar PV infrastructure in some of the Solar PV Areas) is estimated to be 400 FTE. Although the peak workforce is greater than the 'less than 100 occupants' represented by the DT1.1 classification, this threshold would not be exceeded, as the workforce would not be concentrated in a single area as explained above, and would also be transient with construction activities being carried out in a sequential manner with construction teams responsible for specific type of works moving from one area of work to the next. Staffing levels at decommissioning are likely be lower than at construction but are considered to be the same for assessment purposes to present a worst case. Decommissioning works would also be carried out in a sequential manner. Therefore, there would not be greater than 100 personnel within the consultation zone of any of the MAH installations or pipelines at any time during either construction or decommissioning. Paragraphs 16.5.35 to 16.5.39 of Chapter 16: Other Environmental Topics **[AS-016]** provides further details on the residency times of staff on site (working hours etc) for information.
14.4	**Materials and Waste**		
Q14.4.1	The Applicant	ES Section 16.7 includes a number of references to estimates of material use and waste generation being based on similar NSIPs. Please provide details of the NSIP projects used for this comparison and any adjustments made for the respective sizes of those schemes and the application proposal.	Concrete and aggregates estimates are based upon a similar sized scheme (Gate Burton Energy Park). A conversion factor of 0.9 has been applied since East Yorkshire Solar Farm is smaller than Gate Burton Energy Park. Steel estimates are based on 40 tonnes of steel per MW. Table 16-26 of the ES Chapter 16: Other Environmental Topics **[AS-016]** summarises the anticipated waste streams from construction. This information is based upon wastage from construction materials and other wastes (paperboard, wood and plastic) are based on a similar sized scheme, Sunnica Energy Farm (about 500MW). East Yorkshire Solar Farm is a smaller scheme, no conversion factor has been applied.
Q14.4.2	The Applicant	Excavated material (uncontaminated soil and stones) is not considered in the construction waste estimates or when calculating the waste recovery rate, as it is proposed to re-use this material where possible in the on-site construction works. Please confirm whether the ES has assessed the worstcase scenario that could be permitted under the DCO, given that it may not be possible to re-use all the material.	As stated in the Paragraph 16.7.52 of the ES Chapter 16: Other Environmental Topics **[AS-016]** "At this stage the potential for generation of some surplus excavated material cannot be ruled out, but the quantities involved would be not significant in the context of regional landfill capacity, and would only be disposed of to landfill as a last resort, with reuse or deposit for recovery being preferred options." This is considered to cover the worst case scenario that it may not be possible to reuse all the material. The overall quantities of construction waste including excavated material are anticipated to be below the point of significance which is 1% of regional inert (250,000 m^3) and non-hazardous (460,000 m^3) landfill capacity and less than 0.1% of national hazardous (12,500 m^3) landfill capacity. The Applicant is committed to following the waste hierarchy, as set out in the Framework Site Waste Management Plan **[APP-124]** which is secured by Requirement 11(3) of Schedule 2 of the draft DCO.
Q14.4.3	The Applicant	ES16.7.21. Please provide justification for assuming that the landfill diversion rate would be more than 60%	As stated in 16.7.25 b. of the ES Chapter 16: Other Environmental Topics **[AS-016]** "a significant effect would occur at a magnitude of moderate which is a landfill diversion of less than 60%." For construction waste:

ExQ1	Respondent	Question	Applicant's Response
			As stated in 16.7.28 e. of the ES Chapter 16: Other Environmental Topics **[AS-016]** "In 2020, the UK generated 59.1 million tonnes of non-hazardous C&D waste, of which 54.8 million tonnes was recovered. This represents a recovery rate of 92.6%." This is a landfill diversion rate of 92.6%. As outlined in Institute of Environmental Management and Assessment (IEMA) guide to: Materials and Waste in Environment Assessment, Guidance for a Proportionate Approach major UK developments and organisations such as: HS2, Crossrail, London 2012 Olympics, London Heathrow Airport and other construction and demolition activities in the UK have achieved a good practice landfill diversion rate of 90%. Recovery rates for key construction materials and other construction wastes relevant to the Scheme are provided in Table 16-25 **[AS-016]**. All good practice and best practice recovery rates are above 60% and the majority of standard practice recovery rates (including for paperboard, wood, plastic and waste from construction materials) are above 60%. Based on the above landfill diversion rate of 60% is deemed to be achievable. For decommissioning waste: Justification for assuming that the landfill diversion rate would be more than 60% is provided in paragraphs 16.7.62-16.7.64 of the ES Chapter 16: Other Environmental Topics **[AS-016]**.
Q14.4.4	The Applicant	ES16.7.41 states that decommissioning waste would be dealt with in accordance with relevant legislation by licensed waste hauliers. ES16.7.42 refers to the DEMP. Neither ES section 16.7 or the DEMP provide substantive information on the disposal of the solar PV panels when the site is decommissioned. Nor does the ES refer to the possibility of the panels being replaced during the lifetime of the scheme in the event that this becomes commercially attractive due to improved technology. (a) Please comment on this eventuality having regard to ES Table 16-27 which advises that there would be no wholesale replacement of the solar panels. ES2.7.22 and ES16.7.63 refer briefly to recycling rates for some components of the panels. (b) Please provide further details of the options for disposal of the solar PV panels with particular regard to the capacity and location of facilities and the options for any components which are difficult to re-use/recycle.	a) At detailed design stage, the optimal panel will be selected. There will be no wholesale replacement of panels through the lifetime of the scheme. When faulty or damaged solar PV Panels require replacement as part of normal operations, optimal panels available at the time of replacement will be considered. As stated in paragraph 16.7.59 of the ES Chapter 16: Other Environmental Topics **[AS-016]** "waste arisings associated with maintenance activities such as component replacement during the operational life of the Scheme will be managed in the same way as waste from the final decommissioning of the Scheme." b) The exact capacity and location of facilities for recycling components will be confirmed during operation and by the decommissioning contractor before decommissioning. Private sector waste companies will develop these facilities to respond to market demands. Current solar panel waste generation is low, so there is little demand for facilities, hence the limited available capacity presently. Therefore, it is expected that facilities which reuse, recycle, or recover end of-life solar panels will be developed as the quantities of this waste stream increase. The Waste Electrical and Electronic Equipment (WEEE) Regulations place obligations on those who place solar panels on the market to finance the costs of collection, treatment, recovery and environmentally sound disposal; and the landfill tax strongly incentivise reuse, recycling and recovery. It is assumed that specialist regional or national facilities would be in place at the time of decommissioning, and these would be developed in response to demand generated by the UK-wide solar panel industry and waste solar panels would be reused, recycled, or recovered and not disposed of to landfill. The Framework OEMP **[APP-239]** and the Framework DEMP **[APP-240]** set out that the Applicant is committed to maximise recycling and reuse of the Scheme components at the end of their life. There are already organisations around the UK and Europe specialising in solar recycling, such as Recycle Solar, PV Cycle and the European Recycling Platform. They are working with solar developers to minimise electrical waste and recycling old panels in line with the WEEE Regulations. In addition, companies like SECONDSOL offer a marketplace service for the purchase and selling of second-hand PV panels and equipment, where there is still a

ExQ1	Respondent	Question	Applicant's Response
			good level of life in the equipment remaining. Panels that have developed faults or damage can also be refurbished and repowered by specialist companies and the manufacturers and resold or reinstalled. The Applicant will adhere with the industry best practice outlined in Solar Power Europe's Lifecycle Quality Best Practice Guidance.
Q14.4.5	The Applicant	ES16.7.51. Please provide further justification for considering that the proposal would achieve the good practice recovery rates identified in ES Table 16-25.	As stated in 16.7.28 e. of the ES Chapter 16: Other Environmental Topics **[AS-016]** "In 2020, the UK generated 59.1 million tonnes of non-hazardous C&D waste, of which 54.8 million tonnes was recovered. This represents a recovery rate of 92.6%." This is a landfill diversion rate of 92.6%. As outlined in Institute of Environmental Management and Assessment (IEMA) guide to: Materials and Waste in Environment Assessment, Guidance for a Proportionate Approach major UK developments and organisations such as: HS2, Crossrail, London 2012 Olympics, London Heathrow Airport and other construction and demolition activities in the UK have achieved a good practice landfill diversion rate of 90%. Since overall construction waste recovery rates are anticipated to be in excess of the majority of good practice recovery rates, the good practice recovery rates are deemed to be achievable. Estimated construction wastes are deemed to be recyclable or recoverable. The Framework CEMP **[APP-238]** and the Framework Site Waste Management Plan (SWMP) **[APP-124]** set out that the Applicant is committed to maximise recycling and recovery.
15.	**Cumulative Effects and Interactions**		
Q15.0.1	The Applicant	ES Tables 17-1 and 17-2. Please expand on the methodology used for the selection of receptors, descriptions of impacts and interactions and cross reference them more directly to the effects identified in ES Chapters 6 to 16.	Paragraphs 17.5.1 and 17.5.2 **[APP-069]** explain that Tables 17-1 and 17-2 of Cumulative Effects and Interactions focus on the potential for impacts that have been identified as minor, moderate, or major adverse significance in Chapters 6- 16 of the ES **[APP-058 to APP-068]** to interact and intensify the significance of effect when considered with one another or along with effects from other nearby schemes. As inferred in Paragraphs 17.5.1 and 17.5.2, negligible effects do not have the potential to contribute to significant cumulative or interaction effects, as even if a significant effect were predicted, this would be because of other impacts or developments (i.e., the Scheme would only be contributing a negligible effect to this, which Chapter 5 EIA Methodology **[APP-057]** identifies is an imperceptible effect, and would therefore not create a noticeable change to the overall effect). All receptors affected by minor, moderate or major effects from the Scheme identified in Chapters 6- 16 of the ES **[APP-058 to APP-068]** are considered in Table 17-1 and 17-2, albeit simplified for brevity where the description of the effects is the same (for example referring to heritage as a single receptor rather than identifying each heritage receptor), along with the potential for these effects to change when considering other impacts associated with the Scheme or other nearby developments. The exception to this which was not explicitly mentioned in Chapter 17 **[APP-069]** is the global atmosphere, which is the receptor identified in Chapter 6: Climate Change **[APP-058]** against which effects from greenhouse gas emissions were considered; this receptor is not affected by other impacts in Chapters 7 – 16 of the ES **[APP-059 to APP-068]** and was therefore omitted from the assessment of interaction effects. Paragraph 6.10.6 of Chapter 6: Climate Change **[APP-058]** explains that IEMA guidance does not require assessment of cumulative effects when considering the Scheme with other developments, because it the global receptor is affected simultaneously by developments all over the globe, and there is no value considering the effects from only a few of these developments in proximity to the Scheme.

ExQ1	Respondent	Question	Applicant's Response
Q15.0.2	The Applicant	ES Table 17-3. (a) Please explain the justification for the Zone of Influence for Agricultural land (up to 5km) having regard to the definition of the study for this resource in ES Chapter 15. (b) Please expand on the cumulative effects of the loss of agricultural land having particular regard to the updated advice in the WMS dated 15 May 2024.	Part a) ES 15.4.26 **[APP-067]** describes that the Study Area for the assessment of cumulative impacts regarding the loss of Best and Most Versatile (BMV) agricultural land considers all developments in the short-list of other developments **[APP-125]** identified as relevant to the Scheme, in terms of overall loss of BMV agricultural land to development. These 'other developments' are all located within a 5 km radius of the Order limits, which is the distance within which cumulative impacts are expected to occur, as agreed with planning officers at East Riding of Yorkshire and North Yorkshire Council and the basis of the approach to assessing cumulative effects in the ES. The Study Area used in ES Chapter 15 **[APP-067]** and the Zone of Influence (ZoI) described in ES Table 17-3 are consistent, and this is considered to be a proportionate approach to the assessment of cumulative impacts. As the ExA infers, ES Chapter 15 **[APP-067]** then goes on to assess cumulative impacts on a district scale, which does deviate from the standard EIA methodology. This is in response to a district wide cumulative assessment being requested on previous solar NSIPs, trying to pre-empt this query ahead of examination stage. A district wide assessment is logical because, generally speaking, stakeholder concerns relate to the impact on agricultural land from multiple large scale solar farms across their district, and because unlike other receptors such as a house, agricultural land as a receptor is not isolated in one location but instead covers the entire district, as a district resource. Table 15-28 **[APP-067]** and paragraphs 15.10.7 – 15.10.13 discuss the cumulative effects on a district wide scale when considering some of the other large scale solar projects in the district, to close off any request to consider the impact of other solar schemes in the district along with the Scheme. Part b) On 15 May 2024 the Secretary of State for Energy Security and Net Zero made a written ministerial statement (WMS) entitled 'Solar and protecting our Food Security and Best and Most Versatile (BMV) Land'. The broader implications for the consideration of the proposal arising from this WMS are set out in the response to Q1.0.2. On the topic of Assessing Cumulative Impacts, the WMS states: '*While the total area of agricultural land used for solar is very small, and even in the most ambitious scenarios would still occupy less than 1% of the UK's agricultural land, we are increasingly seeing geographical clustering of proposed solar developments in some rural areas, such as in Lincolnshire. When considering whether planning consent should be granted for solar development it is important to consider not just the impacts of individual proposals, but also whether there are cumulative impacts where several proposals come forward in the same locality'.* ES Table 15 28 'Cumulative effects from district-wide solar farm proposals' **[APP-067]** provides details of the three other proposed solar farm projects whose Order limits or planning application boundaries lie within 5 km of the Scheme. The cumulative impacts of these three other solar developments alongside the Scheme on agricultural land and soils are assessed. Therefore, in line with the WMS, ES Chapter 15 considers the impacts of the Scheme (East Yorkshire Solar Farm) in isolation and then also the cumulative impacts of other solar farm proposals in the same locality.
Q15.0.3	The Applicant	ES Appendix 17-1 Shortlist of Cumulative Schemes [APP-125]. It would be helpful to have a plan showing the site areas for the identified schemes.	Figure 17-3 **[APP-229]** illustrates the locations of the cumulative schemes considered in the ES. These cumulative schemes are described in tabular form in Appendix 17-1 **[APP-125]**. Section 10 of each technical assessment chapter in the ES (Chapters 6- 16 of the ES **[APP-058 to APP-068]**)

ExQ1	Respondent	Question	Applicant's Response
			present a discussion of the cumulative effects when considering these schemes, along with an adequate description of the location and areas of the cumulative schemes where this is critical to understanding if there would be cumulative effects. The Applicant has prepared a plan showing the application boundaries of the shortlisted cumulative developments and this is provided at Appendix C.
Q15.0.5	The Applicant	Please update the shortlist based on the updated information provided by ERYC and NYC (contained in their RRs and, if possible, the responses to Q15.0.4). Please update the relevant sections of the ES topic chapters accordingly	The assessment of cumulative impacts of the Scheme with other existing and proposed developments in the locality is set out in chapters 6 – 16 of the Environmental Statement **[APP-058 to APP-061, AS-014, APP-064 to APP-067, and AS016]** and is summarised in Chapter 17: Cumulative Effects and Interactions of the Environmental Statement **[APP-069].** The Relevant Representation submitted by East Riding of Yorkshire Council **[RR-089]** refers to 'other nearby solar farm applications' (in the general vicinity, whether this is within or beyond the study area for cumulative effects). The shortlist presented in Appendix 17-1, ES Volume 2 **[APP-125]** already considers nearby solar farms within the 5km study area for cumulative effects. The Relevant Representation does not change the shortlist and therefore no updates have been made to the short list as a result. The Relevant Representation **[RR-282]** submitted by North Yorkshire Council refers to two applications which have been updated since the shortlist was prepared. The Applicant notes the change in status of these two applications referenced and confirms that there is no change to the cumulative effects assessments as a result. The short list will be reviewed again following the LPA response to Q15.0.4 and updated if required and submitted at Deadline 2 into Examination.
Q15.0.6	The Applicant	Please respond to the concern expressed in a number of RRs that the area already accommodates a range of energy related developments, including wind farms and an anaerobic digestion plant, and that the application proposal would exacerbate the effects energy related development on the wellbeing of the local community.	Chapters 6 – 16 of the Environmental Statement **[APP-058 to APP-061, AS-014, APP-064 to APP-067, and AS016]** present an assessment against the baseline conditions. The baseline conditions are the conditions of the Site and relevant Study Area without the Scheme, against which the effects of the Scheme are assessed. The baseline conditions presented in the ES therefore include these energy related developments in the vicinity of the Order limits. Specifically, the baseline data for the noise assessment for **Chapter 11: Noise and Vibration [APP-063]** was collected through noise monitoring. The existing local wind energy developments (Spaldington Airfield Wind Farm and the individual turbine off Tottering Lane by Solar PV Area 1c) were identified as local noise sources that influence noise conditions. The noise modelling of sound from the Scheme considers the combined effect of the Scheme with these other existing energy related developments. **Chapter 14: Human Health [APP-066]** presents the effects on human and health and wellbeing during construction, operation and decommissioning. It draws upon Chapter 9: Flood Risk, Drainage and Water Environment **[APP-061]**, Chapter 10: Landscape and Visual Amenity **[APP-062]**, Chapter 11: Noise and Vibration **[APP-063]**, Chapter 12: Socio-Economics and Land Use **[APP-064]**, Chapter 13: Transport and Access **[APP-065]**, and Chapter 16: Other Environmental Topics (including Air Quality] **[APP-066]**. This assessment concludes that no significant adverse effects are predicted on health and wellbeing from the construction, operation and decommissioning of the Scheme.

2. Abbreviations

Abbreviation	Definition
AA	Appropriate Assessment
AIA	Arboricultural Impact Assessment
ALC	Agricultural Land Classification
ATC	Automatic Traffic Counts
BEGA	Bilateral Embedded Generation Agreement
BMV	Best and Most Versatile Land
BNG	Biodiversity Net Gain
CEMP	Construction Environmental Management Plan
CCTV	Closed Circuit Television
CTMP	Construction Traffic Management Plan
DBA	Desk Based Assessment
DCO	Development Consent Order
DEMP	Demolition Environmental Management Plan
EA	Environment Agency
EIA	Ecological Impact Assessment
ERYC	East Riding of Yorkshire Council
ES	Environmental Statement
EMR	Electromagnetic Radiation
EMP	Electro Magnetic Fields
EYSF	East Yorkshire Solar Farm
GW	Gigawatt
ha	Hectares
HDD	Horizontal Directional Drilling
HGV	Heavy Goods Vehicle
HRA	Habitats Regulation Assessment
IDB	Independent Drainage Board
INNS	Invasive Non-Native Species

Abbreviation	Definition
LEMP	Landscape and Ecological management Plan
LOAEL	Lowest Observed Adverse Effect Level
LVIA	Land and Visual Impact Assessment
LWS	Local Wildlife Site
MW	Megawatt
NPPF	National Planning Policy Framework
NPS	National Policy Statement
NSIP	Nationally Significant Infrastructure Project
OEMP	Operational Environmental Management Plan
PA	Planning Act 2008
PINS	Planning Inspectorate
PROW	Public Right of Way
PV	Photovoltaic
RPA	Root Protection Area
SAC	Special Area of Conservation
SMP	Soil Management Plan
SoCG	Statement of Common Ground
SRN	Strategic Road Network
SPA	Special Protection Area
SSCEP	Skills, Supply Chain and Employment Plan
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage Systems
WR	Written Representation
WMP	Water Management Plan

Appendix A National Policy Statements for Energy (designated January 2024) Accordance Tables

Appendix A National Policy Statements for Energy (designated January 2024) Accordance Tables

Overarching National Policy Statement for Energy EN-1, November 2023

Table 1. Overarching National Policy Statement for Energy EN-1, November 2023

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
Paragraph 2.1.3	To produce the 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.	As set out in the **Statement of Need [APP-232]** 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 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. The Scheme would provide a number socio-economic benefits, including: **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. **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 [APP-233].** 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 [APP-243]** demonstrates that the Scheme has the potential to deliver significant biodiversity net gain on the Site, with 80% gain predicted for habitat biodiversity units and at least 10% across the whole Site. **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.
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	The **Statement of Need [APP-232]** and Section 5 of the **Planning Statement [APP-233]** 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-

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
	Nationally Determined Contributions to reduce GHG emissions by at least 68 per cent from 1990 levels by 2030. 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.	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 [APP-058]** 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. The **Statement of Need [APP-232]** and Section 5 of the **Planning Statement [APP-233]** 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 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 [APP-232]** and Section 5 of the **Planning Statement [APP-233]** 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% 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.
Paragraph 2.3.4	Meeting these objectives necessitates a significant amount of new energy infrastructure, both large national significant developments and small-scale developments determined at a local 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 primary fuels and 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	The **Statement of Need [APP-232]** 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 [APP-058]** 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. 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. The indirect jobs include those created within the supply chain and therefore reflect the opportunities for low carbon industries to contribute to the Scheme.
Paragraph 2.3.5	The sources of energy we use are changing. Since the industrial revolution, our energy system has been dominated by fossil fuels. That remains the case today. Although representing a record low, fossil fuels still accounted for just over 76 per cent of energy supply in 2020. We need to dramatically increase the volume of energy supplied from low carbon sources.	This policy notes the need to dramatically increase the volume of energy supplies from low carbon sources, requiring a large amount of low-carbon electricity generation as proposed as part of the Scheme.

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
Paragraph 2.3.6	We need to transform the energy system, tackling emissions while continuing to ensure secure and reliable supply… This includes increasing our supply of clean energy from renewables...	The **Statement of Need [APP-232]** and Section 5 of the **Planning Statement [APP-233]** 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.
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 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.	These policies recognise that there are expected to be significant residual adverse impacts associated with large scale energy infrastructure. A summary of environmental effects is found within **Chapter 18: Summary of Environmental Effects, ES Volume 1 [APP-058].** 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. There are no specific and relevant policies set out in the relevant NPSs which clearly indicate that consent should be refused. 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.
Paragraph 3.1.2	However, it will not be possible to develop the necessary amounts of such infrastructure without some significant residual adverse impacts. These effects will be minimised by the application of policy set out in Parts 4 and 5 of this NPS. See also Part 2 of each technology specific NPS.	
Paragraph 3.2.3	It is not the role of the planning system to deliver specific amounts or limit any form of infrastructure covered by this NPS. It is for industry to propose new energy infrastructure projects that they assess to be viable within the strategic framework set by government. This is the nature of a market-based energy system. With the exception of new coal or large-scale oil-fired electricity generation, the government does not consider it appropriate for planning policy to set limits on different technologies but planning policy can be used to support the government's ambitions in energy policy and other policy areas.	It should be noted that 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.
Paragraph 3.2.4	It is not the government's intention in presenting any of the figures or targets in this NPS to propose limits on any new infrastructure that can be consented in accordance with the energy NPSs. 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 enables projects utilising more advanced technology and greater efficiency to come forward. The delivery of an affordable energy system does not always mean picking the least cost technologies. A diversity of supply can aid in ensuring affordability for the system overall and relative costs can change over time, particularly for new and emerging technologies. It	

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
	is not the role of the planning system to compare the costs of individual developments or technology types.	
Paragraph 3.2.5	The government has other mechanisms to influence the delivery of its energy objectives and imposing limits on the consenting of different types of energy infrastructure would reduce competition, increase costs, and disincentivise newer, more efficient solutions coming forward. This does not reduce the need for individual projects to demonstrate compliance with planning and environmental requirements or mean that everything that obtains development consent will get built.	
Paragraph 3.2.6	**The Secretary of State 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 which is urgent, as described for each of them in this Part.** [Bold formatted in the NPS]	The Applicant notes that, in accordance with this policy, the need for infrastructure such as the Scheme is acknowledged and is urgent. A **Statement of Need [APP-232]** is submitted with the Application clearly setting out the need for the project. It is considered to be an important and relevant matter that policy considers this need to be demonstrated.
Paragraph 3.2.7	**In addition, the Secretary of State has determined that substantial weight should be given to this need when considering applications for development consent under the Planning Act 2008.** [Bold formatted in the NPS]	This policy further emphasises that the SoS should give substantial weight to the need for new energy infrastructure when determining applications for development consent.
Paragraph 3.2.8	**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.** [Bold formatted in the NPS]	A **Statement of Need [APP-232]** is submitted with the Application clearly setting out the need for the project. It is considered to be an important and relevant matter that policy considers this need to be demonstrated.
Paragraph 3.3.3	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 illustrative range of 465-515TWh in 2035 and 610-800TWh in 2050.	The **Statement of Need [APP-232]** and Section 5 of the **Planning Statement [APP-233]** 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. As explained in the **Statement of Need [APP-232]** 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.
Paragraph 3.3.12	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	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. As also explained in the **Statement of Need [APP-232]**, 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.

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
	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.	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 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.
Paragraph 3.3.13	The Net Zero Strategy sets out the government's ambition for increasing the deployment of low carbon energy infrastructure consistent with delivering our carbon budgets and the 2050 net zero target. This made clear the commitment that the cost of the transition to net zero should be fair and affordable.	The **Statement of Need [APP-232]** and Section 5 of the **Planning Statement [APP-233]** 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. As set out in the **Statement of Need [APP-232],** 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. The **Statement of Need [APP-232]** 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.
Paragraph 3.3.16	If demand for electricity doubles by 2050, we will need a fourfold increase in low carbon generation and significant expansion of the networks that transport power to where it is needed. In addition, we committed in the 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.	The **Statement of Need [APP-232]** 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.
Paragraph 3.3.19	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.	As explained in the **Statement of Need [APP-232]**, large scale solar is expected to be an important part of the diverse energy mix that this policy sets out is needed.
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 **Statement of Need [APP-232]** and **Section 5 of the Planning Statement [APP-233]** sets out that due to technological advances, solar facilities are already among the cheapest form of electricity generation in the UK and

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
		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. 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. Solar is relatively quick to construct compared to other technologies which have longer construction timeframes or have potentially not yet been proven at scale. 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.
Paragraph 3.3.57	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 [APP-232]** 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.
Paragraph 3.3.58	Given the urgent need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation, there is an urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy.	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. Therefore, consent on low carbon schemes, like the Scheme, that are compliant with policy and can be delivered urgently should be granted without delay.
Paragraph 3.3.59	All the generating technologies mentioned above are urgently needed to meet the Government's energy objectives by: - providing security of supply (by reducing reliance on imported oil and gas, avoiding concentration risk and not relying on one fuel or generation type) - providing an affordable, reliable system (through the deployment of technologies with complementary characteristics) - ensuring the system is net zero consistent (by remaining in line with our carbon budgets and maintaining the options required to deliver for a wide range of demand, decarbonisation and technology scenarios, including where there are difficulties with delivering any technology)	The **Statement of Need [APP-232]** and Section 5 of the **Planning Statement [APP-233]** 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]** 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. As per paragraph 3.2.7, the Scheme should be considered on the basis that its need is established and urgent need should be given substantial weight in the decision.
Paragraph 3.3.60	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.	This confirms that solar PV generation facilities, such as the Scheme, are covered by the published suite of Energy NPSs and are urgently required.

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Paragraph 3.3.61	The need for all these types of infrastructure is established by this NPS and is a combination of many or all of them is urgently required for both energy security and Net Zero.	As per paragraph 3.2.7, 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 3.3.62	Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. Section 4.2 states which energy generating technologies are low carbon and are therefore CNP infrastructure.	These policies confirm that there is a CNP for national significant low carbon infrastructure such as the Scheme, that will outweigh any other residual impact not capable of being addressed by application of the mitigation hierarchy. They also confirm that the Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible.
Paragraph 3.3.63	Subject to any legal requirements, the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible.	The **Statement of Need [APP-232]** and Section 5 of the **Planning Statement [APP-233]** 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.
Paragraph 3.3.65	There is an urgent need for new electricity network infrastructure to be brought forward at pace 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 3.3.82	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 [APP-232]** 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.
Paragraph 3.3.83	Given the urgent need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation, there is an urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy.	This policy again emphasises the urgent need for the Scheme. 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.
Assessment Principles		
Paragraph 4.1.5	In considering any proposed development, in particular when weighing its adverse impacts against its benefits, the Secretary of State should take into account: - its potential benefits including its contribution to meeting the need for energy infrastructure, job creation, reduction of geographical disparities, environmental enhancements, and any long-term or wider benefits	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. **Section 5.3 of this Planning Statement [APP-233]** 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.

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	-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	**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. **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 [APP-233].** 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 [APP-243]** demonstrates that the Scheme has the potential to deliver significant biodiversity net gain on the Site, with 80% gain predicted for habitat biodiversity units and at least 10% across the whole Site. **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 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 Scheme are set out in the relevant chapters and appendices of the **ES [APP-052-APP-231]** and are discussed in the **Planning Statement [APP-233].** A summary of environmental effects is found within **Chapter 18: Summary of Environmental Effects, ES Volume 1 [AS-018]**. 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 the Planning Statement **[APP-233].** The adverse impacts of the Scheme are set out in relevant chapter and appendices of the **ES [APP-052-APP-231]**. These take account of impacts and benefits at national, regional and local levels.
Paragraph 4.1.7	Where this NPS or the relevant technology specific NPSs require an applicant to mitigate a particular impact as far as possible, but the Secretary of State considers that there would still be residual adverse effects after the implementation of such mitigation measures, the Secretary of State should weigh those residual effects against the benefits of the proposed development. For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases. This presumption, however, does not apply to residual impacts which presents an unacceptable risk to, or interference with,	The adverse environmental impacts of the Scheme have been assessed as reported in the **ES [APP-052-APP-231]** and are discussed in this **Planning Statement [APP-233].** 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.

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
	human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero.	
Paragraph 4.1.12	Other matters that the Secretary of State may consider both important and relevant to their decision-making may include Development Plan documents or other documents in the Local Development Framework.	Other matters that the secretary of State may consider both important and relevant to their decision-making including Development Plan documents or other documents in the Local Development Framework, and emerging plans, have been considered in the **Planning Statement [APP-233]** which provides an assessment of the Scheme's compliance with the policies within these documents. The Scheme has taken account of the stage which the relevant Development Plan documents in England have reached. These are also set out within Appendix B of the **Planning Statement [APP-233].** The Applicant notes that in the event of a conflict between these documents and an NPS, the NPS prevails for the purpose of Secretary of State decision making given the national significance of the infrastructure.
Paragraph 4.1.13	Where the project conflicts with a proposal in a draft Development Plan, the Secretary of State should take account of the stage which the Development Plan document in England or Local Development Plan in Wales has reached in deciding what weight to give to the plan for the purposes of determining the planning significance of what is replaced, prevented, or precluded.	
Paragraph 4.1.14	The closer the Development Plan document in England or Local Development Plan in Wales is to being adopted by the LPA, the greater weight which can be attached to it.	
Paragraph 4.1.15	In the event of a conflict between these documents and an NPS, the NPS prevails for the purpose of Secretary of State decision making given the national significance of the infrastructure.	
Paragraph 4.2.4	Government has therefore concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure.	This policy confirms that there is a CNP for national significant low carbon infrastructure such as the Scheme. The Statement of Need **[APP-232]** and Section 5 of the Planning Statement [**APP-233]** 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.
Paragraph 4.2.5	This does not extend the definition of what counts as nationally significant infrastructure: the scope remains as set out in the Planning Act 2008. Low carbon infrastructure for the purposes of this policy means: - for electricity generation, all onshore and offshore generation that does not involve fossil fuel combustion (that is, renewable generation, including anaerobic digestion and other plants that convert residual waste into energy, including combustion, provided they meet existing definitions of low carbon; and nuclear generation), as well as natural gas fired generation which is carbon capture ready	This policy confirms that solar PV generation facilities, such as the Scheme, are covered by the definition of "CNP" and as set out in the **Statement of Need [APP-232]** and Section 5 of this **Planning Statement [APP-233]** are urgently required.
Paragraph 4.2.6	The overarching need case for each type of energy infrastructure and the substantial weight which should be given to this need in assessing applications, as set out in paragraphs 3.2.6 to 3.2.8 of	

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
	EN-1, is the starting point for all assessments of energy infrastructure applications.	This confirms the Scheme should be considered on the basis that its need is established as a CNP and the urgent need for this infrastructure should be given substantial weight in the decision making process and be the starting point for its assessment by the SoS.
Paragraph 4.2.7	The CNP policy **does not** create an additional or cumulative need case or weighting to that which is already outlined for each type of energy infrastructure. The policy applies following the normal consideration of the need case, the impacts of the project, and the application of the mitigation hierarchy. As such, it is relevant during Secretary of State decision making and specifically in reference to any residual impacts that have been identified. It should therefore also be given consideration by the Examining Authority when it is making its recommendation to the Secretary of State.	
Paragraph 4.2.8	During decision making, the CNP policy will influence how non-HRA and non-MCZ residual impacts are considered in the planning balance. The policy will therefore also influence how the Secretary of State considers whether tests requiring clear outweighing of harm, exceptionality, or very special circumstances have been met by a CNP Infrastructure application. Further detail is provided in paragraphs 4.2.15 to 4.2.17, and Figure 2.	These paragraphs make it clear that during decision making, consideration should be given to CNP policy when considering non-HRA and non-MCZ residual impacts, and whether tests requiring clear outweighing of harm, exceptionality, or very special circumstances relating to are met by the application.
Paragraph 4.2.9	During decision making, the CNP policy also explains the Secretary of State's approach to HRA derogations and MCZ assessments. Specifically, the policy explains how the alternative solutions and IROPI tests are considered by the Secretary of State. Further detail is provided in paragraphs 4.2.18 to 4.2.22, and Figure 3.	
Paragraph 4.2.10	Applicants for CNP infrastructure must continue to show how their application meets the requirements in this NPS and the relevant technology specific NPS, applying the mitigation hierarchy, as well as any other legal and regulatory requirements.	These accordance tables set out how the application meets the requirements of the recently designated NPS' including EN-1, EN-3 and EN-5. The mitigation hierarchy has been applied throughout the design and development of the Scheme and has resulted in a project with limited significant residual effects. The **ES [APP-052-APP-231]** sets out that any residual effects are those that cannot be avoided, reduced or mitigated. 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. The ES and management plans submitted with the application set out how residual impacts will be compensated for, mitigated as far as possible, and monitored. The cumulative impacts of the Scheme with other existing and proposed energy sector developments is set out in **chapters 6 – 16, ES Volume 1 [APP-058, APP-059, APP-060, APP-061, APP-062, APP-063, APP-064, APP-065, APP-066, APP-067, APP-068]** and is summarised in **Chapter 17: Cumulative Effects and Interactions, ES Volume 1 [APP-069].**
Paragraph 4.2.11	Applicants must apply the mitigation hierarchy and demonstrate it has been applied. They should also seek the advice of the appropriate SNCB or other relevant statutory body when undertaking this process. Applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated.	
Paragraph 4.2.12	Applicants should set out how residual impacts will be compensated for as far as possible. Applicants should also set out how any mitigation or compensation measures will be monitored and reporting agreed to ensure success and that action is taken. Changes to measures may be needed e.g. adaptive management. The cumulative impacts of multiple developments with residual impacts should also be considered.	

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
Paragraph 4.2.14	The Secretary of State will continue to consider the impacts and benefits of all CNP Infrastructure applications on a case-by-case basis. The Secretary of State must be satisfied that the applicant's assessment demonstrates that the requirements set out above have been met	The Applicants assessment within the **ES [APP-052-APP-231]** demonstrates that the requirements of this policy have been met.
Paragraph 4.2.15	Where residual non-HRA or non-MCZ impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. Therefore, in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts. The exception to this presumption of consent are residual impacts onshore and offshore which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero. Further, the same exception applies to this presumption for residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk.	It is acknowledged in these paragraphs that residual non HRA or non MCZ impacts are unlikely to outweigh the urgent need for this type of infrastructure. As demonstrated in Section 6 of the **Planning Statement [APP-233]**, the key adverse impacts of the Scheme relate to significant effects upon landscape character due to the change in use of the land, and localised landscape and visual impacts that are relatively limited and local in nature. These impacts are non HRA and non MCZ. The design development of the Scheme has followed the mitigation hierarchy and all residual effects have been reduced as far as practicable. It is very clear that the extent and nature of the residual impacts do not trigger exceptional circumstances to refuse consent with the presumption firmly engaged in favour of granting development consent to deliver CNP infrastructure, as set out in paragraph 4.2.15 of NPS EN-1 which states that "*in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts*". The limited and localised impacts resulting from the Scheme do not come anywhere near the tests set out in paragraph 4.2.16, with no impact on nationally designated landscapes.
Paragraph 4.2.16	As a result, the Secretary of State will take as the starting point for decision-making that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm, exceptionality or very special circumstances.	By contrast, the benefits of the Scheme are substantial and significant at both a national, regional and local level, leading to an overwhelming balance in favour of granting development consent for the Scheme.
Paragraph 4.2.17	This means that the Secretary of State will take as a starting point that CNP Infrastructure will meet the following, non-exhaustive, list of tests: -where development within a Green Belt requires very special circumstances to justify development; -where development within or outside a Site of Special Scientific Interest (SSSI) requires the benefits (including need) of the development in the location proposed to clearly outweigh both the likely impact on features of the site that make it a SSSI, and any broader impacts on the national network of SSSIs. -where development in nationally designated landscapes requires exceptional circumstances to be demonstrated; and -where substantial harm to or loss of significance to heritage assets should be exceptional or wholly exceptional.	

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
Paragraph 4.3.1	All proposals for projects that are subject to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) must be accompanied by an Environmental Statement (ES) describing the aspects of the environment likely to be significantly affected by the project	An **Environmental Statement (ES) and accompanying appendices, figures [APP-052-APP-231]**, **non-technical summary [APP-230]** and **Environment Mitigation and Commitments Register [APP-231]** have been submitted with this Application. These describe the aspects of the environmental likely to be significantly affected by the Scheme.
Paragraph 4.3.5	For the purposes of this NPS and the technology specific NPSs the ES should cover the environmental, social and economic effects arising from pre-construction, construction, operation and decommissioning of the project.	The **ES [APP-052-APP-231]** covers the environmental, social and economic effects arising from pre-construction, construction, operation and decommissioning of the Scheme.
Paragraph 4.3.10	The applicant must provide information proportionate to the scale of the project, ensuring the information is sufficient to meet the requirements of the EIA Regulations	The **ES [APP-052-APP-231]** meets the requirements of the EIA Regulations, and provides information proportionate to the scheme of the Scheme.
Alternatives		
Paragraph 4.3.9	As in any planning case, the relevance or otherwise to the decision making process of the existence (or alleged existence) of alternatives to the proposed development is, in the first instance, a matter of law. This NPS does not contain any general requirement to consider alternatives or to establish whether the proposed project represents the best option from a policy perspective. Although there are specific requirements in relation to compulsory acquisition and habitats sites, the NPS does not change requirements in relation to compulsory acquisitions and habitats sites	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 [APP-233]** 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. **Chapter 3: Alternatives and Design Evolution, ES Volume 1 [APP-055]** sets out information in relation to alternatives that is required by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 andincludes information about the main alternatives studied. The **Habitats Regulations Assessment [APP-244]** confirms there is no requirement to consider alternatives due to biodiversity effects. The Scheme does not propose development within nationally designated landscapes requiring a consideration of alternatives in that respect. 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 out in section 3.4 and section 3.7 **Chapter 3: Alternatives and Design Evolution, ES Volume 1 [APP-055].** A Flood Risk Assessment is provided with the Application in **Appendix 9-3, ES Volume 2 [APP-096]** 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 4.3.15	Applicants are obliged to include in their ES, information about the reasonable alternatives they have studied. This should include an indication of the main reasons for the applicant’s choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility.	
Paragraph 4.3.17	Where there is a policy or legal requirement to consider alternatives, the applicant should describe the alternatives considered in compliance with these requirements.	
Paragraph 4.3.20	The Government has set 13 legally binding targets for England under the Environment Act 2021, covering the areas of: biodiversity; air quality; water; resource efficiency and waste reduction; tree and woodland cover; and Marine Protected Areas. Meeting the legally binding targets will be a shared endeavour that will require a whole of government approach to delivery. The Secretary of State have regard to the ambitions, goals and targets set out in the Government’s Environmental Improvement Plan 2023 for improving	

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
	the natural environment and heritage. This includes having regard to the achievement of statutory targets set under the Environment Act.	
Paragraph 4.3.22	Given the level and urgency of need for new energy infrastructure, the Secretary of State should, subject to any relevant legal requirements (e.g. under the Habitats Regulations) which indicate otherwise, be guided by the following principles when deciding what weight should be given to alternatives: • the consideration of alternatives in order to comply with policy requirements should be carried out in a proportionate manner • only alternatives that can meet the objectives of the proposed development need to be considered	
Paragraph 4.3.23	The Secretary of State should be guided in considering alternative proposals by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security, climate change, and other environmental benefits) in the same timescale as the proposed development	
Paragraph 4.3.24	The Secretary of State should not refuse an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site, and should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals	
Paragraph 4.3.25	Alternatives not among the main alternatives studied by the applicant (as reflected in the ES) should only be considered to the extent that the Secretary of State thinks they are both important and relevant to the decision	
Paragraph 4.3.27	Alternative proposals which mean the necessary development could not proceed, for example because the alternative proposals are not commercially viable or alternative proposals for sites would not be physically suitable, can be excluded on the grounds that they are not important and relevant to the Secretary of State's decision.	
Paragraph 4.3.28	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.	
Paragraph 4.3.29	It is intended that potential alternatives to a proposed development should, wherever possible, be identified before an application is made to the Secretary of State (so as to allow appropriate consultation and the development of a suitable evidence base in	

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
	relation to any alternatives which are particularly relevant). Therefore, where an alternative is first put forward by a third party after an application has been made, the Secretary of State may place the onus on the person proposing the alternative to provide the evidence for its suitability as such and the Secretary of State should not necessarily expect the applicant to have assessed it.	
Health		
Paragraph 4.4.4	As described in the relevant sections of this NPS and in the technology specific NPSs, where the proposed project has an effect on humans, the ES should assess these effects for each element of the project, identifying any potential adverse health impacts, and identifying measures to avoid, reduce or compensate for these impacts as appropriate.	**Chapter 14: Human Health of the ES [APP-066]** 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. 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. As a result of the site selection and design, no significant adverse effects are predicted on human health as a result of the Scheme.
Paragraph 4.4.5	The impacts of more than one development may affect people simultaneously, so the applicant should consider the cumulative impact on health in the ES where appropriate	
Paragraph 4.4.6	Opportunities should be taken to mitigate indirect impacts, by promoting local improvements to encourage health and wellbeing, this includes potential impacts on vulnerable groups within society, i.e. those groups which may be differentially impacted by a development compared to wider society as a whole.	
Paragraph 4.4.7	Generally, those aspects of energy infrastructure which are most likely to have a significantly detrimental impact on health are subject to separate regulation (for example for air pollution) which will constitute effective mitigation of them, so that it is unlikely that health concerns will either by themselves constitute a reason to refuse consent or require specific mitigation under the Planning Act 2008.	The impacts of the Scheme on human health is addressed in **Chapter 14: Human Health of the ES [APP-066]** 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 includes the effects of traffic, air or water pollution, dust, odour, hazardous waste and substances, noise, exposure to radiation, and increases in pests. 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. As a result of the site selection and design, no significant adverse effects are predicted on health as a result of the Scheme.
Paragraph 4.4.8	However, not all potential sources of health impacts will be mitigated in this way and the Secretary of State may want to take account of health concerns when setting requirements relating to a range of impacts such as noise.	
Biodiversity Net Gain		
Paragraph 4.6.1	Environmental net gain is an approach to development that aims to leave the natural environment in a measurably better state than beforehand. Projects should therefore not only avoid, mitigate and compensate harms, following the mitigation hierarchy, but also consider whether there are opportunities for enhancements.	As set out in **Chapter 8: Ecology, ES Volume 1 [APP-060]** 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).

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Paragraph 4.6.2	Biodiversity net gain is an essential component of environmental net gain. Projects in England should consider and seek to incorporate improvements in natural capital, ecosystem services and the benefits they deliver when planning how to deliver biodiversity net gain.	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): 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 [APP-060]** and the updated HRA, which will be submitted during the Examination, 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. A total of 43.75ha of mitigation habitat will be provided. 28.75ha of wet grassland will be provided for Golden Plover and 15ha of arable land maintained under a suitable cropping regime and management practices for pink-footed goose in the north west part of the Scheme. This would 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 [APP-060]** 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 [APP-233]** 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 Biodiversity Net Gain (BNG) report using Natural England's Biodiversity Metric 4.0, has been updated for Deadline 1 of the Examination. This report demonstrates that the Scheme will deliver 80.42% BNG for area-based units, 10.30% BNG for hedgerow units and 10.09% BNG for watercourse units. The Scheme has therefore taken advantage of opportunities to conserve and enhance biodiversity and accords with this policy.
Paragraph 4.6.6	Energy NSIP proposals, whether onshore or offshore, should seek opportunities to contribute to and enhance the natural environment by providing net gains for biodiversity, and the wider environment where possible.	
Paragraph 4.6.7	In England applicants for onshore elements of any development are encouraged to use the latest version of the biodiversity metric to calculate their biodiversity baseline and present planned biodiversity	The Biodiversity Net Gain (BNG) report using Natural England's Biodiversity Metric 4.0, has been updated for Deadline 1 of the Examination. This report demonstrates that the Scheme will deliver 80.42% BNG for area-based units, 10.30%

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	net gain outcomes. This calculation data should be presented in full as part of their application.	BNG for hedgerow units and 10.09% BNG for watercourse units. Therefore, the Scheme delivers significant biodiversity net gain on the site, with at least 10% BNG across the whole Site.
Paragraph 4.6.8	Where possible, this data should be shared, alongside a completed biodiversity metric calculation with the Local Authority and Natural England for discussion at the pre-application stage as it can help to highlight biodiversity and wider environmental issues which may later cause delays if not addressed.	
Paragraph 4.6.10	Biodiversity net gain should be applied after compliance with the mitigation hierarchy and does not change or replace existing environmental obligations, although compliance with those obligations will be relevant to the question of the baseline for assessing net gain and if they deliver an additional enhancement beyond meeting the existing obligation, that enhancement will count towards net gain	The Biodiversity Net Gain (BNG) report using Natural England's Biodiversity Metric 4.0, has been updated for Deadline 1 of the Examination. This report demonstrates that the Scheme will deliver 80.42% BNG for area-based units, 10.30% BNG for hedgerow units and 10.09% BNG for watercourse units. Therefore, the Scheme delivers significant biodiversity net gain on the site, with at least 10% BNG across the whole Site.
Paragraph 4.6.13	In addition to delivering biodiversity net gain, developments may also deliver wider environmental gains and benefits to communities relevant to the local area, and to national policy priorities, such as • reductions in GHG emissions, • reduced flood risk, • improvements to air or water quality, • climate adaptation, • landscape enhancement, • increased access to natural greenspace or • The enhancement, expansion or provision of trees and woodlands The scope of potential gains will be dependent on the type, scale, and location of specific projects. Applicants should look for a holistic approach to delivering wider environmental gains and benefits through the use of nature-based solutions and Green Infrastructure.	The Scheme will deliver a substantial reduction in greenhouse gas emissions over its lifetime, as explained by **Chapter 6: Climate Change, ES Volume 1 [APP-058].** 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. The Scheme's climate adaptation measures are set out in the relevant ES Chapters. Landscape enhancement measures are set out in the **Framework LEMP [APP-233].** The Biodiversity Net Gain (BNG) report using Natural England's Biodiversity Metric 4.0 has been updated for Deadline 1 of the Examination. This report demonstrates that the Scheme will deliver 80.42% BNG for area-based units, 10.30% BNG for hedgerow units and 10.09% BNG for watercourse units. Therefore, the Scheme delivers significant biodiversity net gain on the site, with at least 10% BNG across the whole Site.
Paragraph 4.6.15	Applications for development consent should be accompanied by a statement demonstrating how opportunities for delivering wider environmental net gains have been considered, and where appropriate, incorporated into proposals as part of good design (including any relevant operational aspects) of the project.	The **Biodiversity Net Gain Assessment Report [APP-243]** provides an assessment of how effective measures have been incorporated into the Scheme to deliver environmental gains. The Biodiversity Net Gain (BNG) report using Natural England's Biodiversity Metric 4.0 has been updated for Deadline 1 of the Examination. This report demonstrates that the Scheme will deliver 80.42% BNG for area-based units, 10.30% BNG for hedgerow units and 10.09% BNG for watercourse units. Therefore, the Scheme delivers significant biodiversity net gain on the site, with at least 10% BNG across the whole Site.
Paragraph 4.6.16	Applicants should make use of available guidance and tools for measuring natural capital assets and ecosystem services, such as	

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	the Natural Capital Committee's 'How to Do it: natural capital workbook', the government's guidance on Enabling a Natural Capital Approach (ENCA), and other tools that aim to enable wider benefits for people and nature.	Opportunities to enhance other environmental gains are outlined by topic in the relevant sections of the **ES Volume 1 [APP-052-APP-070], the Framework LEMP [APP-233]** and how these have been incorporated as part of good design is set out in the **Design and Access Statement [APP-234]** and Section 6 of this **Planning Statement [APP-233].**
Paragraph 4.6.17	Where environmental net gain considerations have featured as part of the strategic options appraisal process to select a project, applicants should reference that information to supplement the site-specific details.	**Chapter 3: Alternatives and Design Evolution, ES Volume 1 [APP-055]** explains how the alternative options for the Scheme were considered during design development.
Paragraph 4.6.1	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 Biodiversity Net Gain (BNG) report using Natural England's Biodiversity Metric 4.0 has been updated for Deadline 1 of the Examination. This report demonstrates that the Scheme will deliver 80.42% BNG for area-based units, 10.30% BNG for hedgerow units and 10.09% BNG for watercourse units. Therefore, the Scheme delivers significant biodiversity net gain on the site, with at least 10% BNG across the whole Site.
Paragraph 4.6.2	The biodiversity gain objective will be set out in a biodiversity gain statement (as defined under the Environment Act 2021). Normally these statements would be included within an NPS, but the Act allows for the statement to be published separately where a review of an NPS has begun before the provisions are commenced, as is the case with these energy NPSs. Under the provision of the Environment Act 2021, any such separate biodiversity gain statement will be regarded as being contained within these NPSs.	
Paragraph 4.6.3	The Secretary of State should give appropriate weight to environmental and biodiversity net gain, although any weight given to gains provided to meet a legal requirement (for example under the Environment Act 2021) is likely to be limited.	
Design		
Paragraph 4.7.1	The visual appearance of a building, structure, or piece of infrastructure, and how it relates to the landscape it sits within, is sometimes considered to be the most important factor in good design. But high quality and inclusive design goes far beyond aesthetic considerations. The functionality of an object – be it a building or other type of infrastructure – including fitness for purpose and sustainability, is equally important.	As detailed in Section 6.3 of this Planning Statement the Scheme has been subject to 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 [APP-055],** and the **Design and Access Statement [APP-234].**
Paragraph 4.7.2	Applying "good design" to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It	

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
	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	
Paragraph 4.7.3	Good design is also a means by which many policy objectives in the NPSs can be met, for example the impact sections show how good design, in terms of siting and use of appropriate technologies, can help mitigate adverse impacts such as noise. Projects should look to use modern methods of construction and sustainable design practices such as use of sustainable timber and low carbon concrete. Where possible, projects should include the reuse of material.	
Paragraph 4.7.4	Given the benefits of “good design” in mitigating the adverse impacts of a project, applicants should consider how “good design” can be applied to a project during the early stages of the project lifecycle.	As detailed in the **Design and Access Statement [APP-234]** and Section 6.3 of the **Planning Statement [APP-233],** 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 [APP-055], Volume 1 of the ES [APP-052- APP-070]** and the **Design and Access Statement [APP-234]**
Paragraph 4.7.5	To ensure good design is embedded within the project development, a project board level design champion could be appointed, and a representative design panel used to maximise the value provided by the infrastructure. Design principles should be established from the outset of the project to guide the development from conception to operation. Applicants should consider how their design principles can be applied post-consent.	As detailed in the **Design and Access Statement [APP-234]** and Section 6.3 of the **Planning Statement [APP-233],** 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 [APP-055], Volume 1 of the ES [APP-052- APP-070]** and the **Design and Access Statement [APP-234].** As set out in the **Design and Access Statement [APP-234]**, 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 delivering the design champion role encouraged by 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.
Paragraph 4.7.6	Whilst the applicant may not have any or very limited choice in the physical appearance of some energy infrastructure, there may be opportunities for the applicant to demonstrate good design in terms of siting relative to existing landscape character, land form and vegetation. Furthermore, the design and sensitive use of materials in any associated development such as electricity substations will assist in ensuring that such development contributes to the quality of the area. Applicants should also, so far as is possible, seek to embed opportunities for nature inclusive design within the design process.	As detailed in the **Design and Access Statement [APP-234]** and Section 6 of the **Planning Statement [APP-233]** 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 [APP-055], Volume 1 of the ES [APP-052- APP-070]** and the **Design and Access Statement [APP-234].**

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
		The **Outline Design Principles Statement [APP-235]** secure elements of good design and ensures they are implemented.
Paragraph 4.7.7	Applicants must demonstrate in their application documents how the design process was conducted and how the proposed design evolved. Where a number of different designs were considered, applicants should set out the reasons why the favoured choice has been selected.	The design process and basis of design decisions are set out in **Chapter 3: Alternatives and Design Evolution [APP-055], Volume 1 of the ES [APP-052- APP-070]** and the **Design and Access Statement [APP-234].**
Paragraph 4.7.8	Applicants should consider taking independent professional advice on the design aspects of a proposal. In particular, the Design Council can be asked to provide design review for nationally significant infrastructure projects and applicants are encouraged to use this service. Applicants should also consider any design guidance developed by the local planning authority.	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, along with others.
Paragraph 4.7.10	In the light of the above and given the importance which the Planning Act 2008 places on good design and sustainability, the Secretary of State needs to be satisfied that energy infrastructure developments are sustainable and, having regard to regulatory and other constraints, are as attractive, durable, and adaptable (including taking account of natural hazards such as flooding) as they can be.	The 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 [APP-234]** 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. The design process and basis of design decisions are set out in **Chapter 3: Alternatives and Design Evolution [APP-055], Volume 1 of the ES [APP-052- APP-070]** and the **Design and Access Statement [APP-234].** The **Outline Design Principles Statement [APP-235]** secure elements of good design and ensures they are implemented. Whilst 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 as detailed in the **Design and Access Statement [APP-234]**. The Scheme delivers good design, meeting the requirements of the 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. Climate change resilience measures embedded within the Scheme, particularly in relation to flood risk are included in the **Framework CEMP [APP-238].** 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 [APP-061].**
Paragraph 4.7.11	In doing so, the Secretary of State should be satisfied that the applicant has considered both functionality (including fitness for purpose and sustainability) and aesthetics (including its contribution to the quality of the area in which it would be located, any potential	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.

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
	amenity benefits, and visual impacts on the landscape or seascape) as far as possible.	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 [APP-234].** 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 [APP-233].** A detailed LEMP will be prepared in accordance with this, and will be secured by the DCO. The landscape design principles aim to achieve the following: 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
Paragraph 4.7.12	In considering applications, the Secretary of State should take into account the ultimate purpose of the infrastructure and bear in mind the operational, safety and security requirements which the design has to satisfy. Many of the wider impacts of a development, such as landscape and environmental impacts, will be important factors in the design process.	
Climate Change Adaptation and Resilience		
Paragraph 4.10.5	In certain circumstances, measures implemented to ensure a scheme can adapt to climate change may give rise to additional impacts, for example as a result of protecting against flood risk, there may be consequential impacts on coastal change. In preparing measures to support climate change adaptation applicants should take reasonable steps to maximise the use of nature-based solutions alongside other conventional techniques.	Consideration has been given to incorporating nature-based climate change adaption into the Scheme, and proposals for SuDS have been included. Details of the approaches taken to adapt to climate change are set out in **Chapter 6: Climate Change, ES Volume 1 [APP-058], Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 [APP-061]** and their related appendices.
Paragraph 4.10.6	Integrated approaches, such as looking across the water cycle, considering coordinated management of water storage, supply, demand, wastewater, and flood risk can provide further benefits to address multiple infrastructure needs, as well as carbon sequestration benefits.	
Paragraph 4.10.7	In addition to avoiding further GHG emissions when compared with more traditional adaptation approaches, nature-based solutions can also result in biodiversity benefits and net gain, as well as increasing absorption of carbon dioxide from the atmosphere	
Paragraph 4.10.8	New energy infrastructure will typically need to remain operational over many decades, in the face of a changing climate. Consequently, applicants must consider the direct (e.g. site flooding, limited water availability, storms, heatwave and wildfire threats to infrastructure and operations) and indirect (e.g. access roads or other critical dependencies impacted by flooding, storms, heatwaves or wildfires) impacts of climate change when planning the location, design, build, operation and, where appropriate, decommissioning of new energy infrastructure	**Chapter 6: Climate Change, ES Volume 1 [APP-058], Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 [APP-061], and Chapter 16: Other Environmental Topics, ES Volume 1 [APP-068]** 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.

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
Paragraph 4.10.9	The ES should set out how the proposal will take account of the projected impacts of climate change, using government guidance and industry standard benchmarks such as the Climate Change Allowances for Flood Risk Assessments, Climate Impacts Tool, and British Standards for climate change adaptation, in accordance with the EIA Regulations.	As outlined in **Chapter 6: Climate Change of the ES [APP-058]**, 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): 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 [APP-113])** 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 [APP-233],** which has been submitted as part of the DCO application; 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 [APP-238], Framework OEMP [APP-239**] and **Framework DEMP [APP-240**] 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 [APP-238]**. 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 [APP-061]**. 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
Paragraph 4.10.11	Applicants should demonstrate that proposals have a high level of climate resilience built-in from the outset and should also demonstrate how proposals can be adapted over their predicted lifetimes to remain resilient to a credible maximum climate change scenario. These results should be considered alongside relevant research which is based on the climate change projections.	
Paragraph 4.10.13	The Secretary of State should be satisfied that applicants for new energy infrastructure have taken into account the potential impacts of climate change using the latest UK Climate Projections and associated research and expert guidance (such as the EA's Climate Change Allowances for Flood Risk Assessments or the Welsh Government's Climate change allowances and flood consequence assessments) available at the time the ES was prepared to ensure they have identified appropriate mitigation or adaptation measures. This should cover the estimated lifetime of the new infrastructure, including any decommissioning period.	

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
		transformers have a wide range of acceptable operation temperatures, and it has been determined that increasing temperatures will not adversely affect their operation.
Paragraph 4.11.4	Transmission network infrastructure, and related network reinforcement and upgrade works, associated with nationally significant low carbon infrastructure is considered as CNP Infrastructure. Further guidance can be found in Section 4.2 of this NPS and EN-5.	As set out in paragraph 4.2.5 of this NPS, the Scheme is considered to be CNP infrastructure.
Paragraph 4.11.12	The Secretary of State should be satisfied that appropriate network connection arrangements are/will be in place for a given project regardless of whether one or multiple (linked) applications are submitted.	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 [APP-236].** 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. The DCO covers all infrastructure required to construct, operate (including maintain) and decommission the Scheme, with no further planning consent expected to be needed.
Paragraph 4.12.9	In considering an application for development consent the Secretary of State should focus on whether the development itself is an acceptable use of the land or sea, and the impact of that use, rather than the control of processes, emissions or discharges themselves.	**Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 [APP-061]** outlines pollution controls for the construction and operation phases of development. Other required permits and consents are listed within the chapter. A **Framework CEMP [APP-238]** is also included**.**
Paragraph 4.13.5	Applicants should consult with the HSE on matters relating to safety.	The Applicant team has consulted with the HSE.
Paragraph 4.13.6	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 4.13.7	If a safety report is required it is important to discuss with the Competent Authority the type of information that should be provided at the design and development stage, and what form this should take. This will enable the Competent Authority to review as much information as possible before construction begins, in order to assess whether the inherent features of the design are sufficient to prevent, control and mitigate major accidents	The Scheme is not subject to the COMAH regulations, and a safety report is not required.
Paragraph 4.13.8	The Secretary of State should be satisfied that a safety assessment has been prepared, where required, and that the Competent Authority has raised no safety objectives.	The Scheme is not subject to the COMAH regulations, and a safety report is not required.
Paragraph 4.14.5	Applicants must consult the (HSA) and HSE at pre-application stage if the project is likely to need hazardous substances consent. Hazardous substances consents are a part of the planning regime which contributes to public safety.	The Applicant team has consulted with the HSE. The Scheme is not subject to the COMAH regulations.

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
Common Law Nuisance and Statutory Nuisance		
Paragraph 4.15.5	At the application stage of an energy NSIP, possible sources of nuisance under section 79(1) of the EPA 1990 and how they may be mitigated or limited should be identified by the applicant so that appropriate requirements can be included in any subsequent order granting development consent (see Section 5.7 on dust, odour, artificial light etc. and Section 5.12 on noise and vibration).	A **Statutory Nuisance Statement [APP-237]** has been included with the application to assess any possible sources of nuisance under section 79(1) of the EPA 1990.
Air Quality and emissions		
Paragraph 5.2.7	Proximity to emission sources can have significant impacts on sensitive receptor sites for air quality, such as 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 (see paragraph 5.2.12 below)	**Section 16.2** of **Chapter 16, Other Environmental Topics of the ES [AS-016]** 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.
Paragraph 5.2.8	Where the project is likely to have adverse effects on air quality the applicant should undertake an assessment of the impacts of the proposed project as part of the ES.	
Paragraph 5.2.9	The ES should describe: • existing air quality concentrations and the relative change in air quality from existing levels; • any significant air quality , their mitigation action taken and any residual effects distinguishing between the project stages and taking account of any significant emissions from any road traffic generated by the project; • the predicted absolute emissions, concentration change and absolute concentrations as a result of the proposed project, after mitigation methods have been applied; and any potential eutrophication impacts.	
Paragraph 5.2.12	Where a proposed development is likely to lead to a breach of any relevant statutory air quality limits, objectives or targets, or affect the ability of a non-compliant area to achieve compliance within the timescales set out in the most recent relevant air quality plan /strategy at the time of the decision, the applicant should work with the relevant authorities to secure appropriate mitigation measures to ensure that those statutory limits, objectives or targets are not breached.	The Scheme would not lead to a breach of air quality thresholds or affect the ability of a non-compliant area to achieve compliance.

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
Paragraph 5.2.13	The Secretary of State should consider whether mitigation measures are needed both for operational and construction emissions over and above any which may form part of the project application. A construction management plan may help codify mitigation at this stage. In doing so the Secretary of State should have regard to the Air Quality Strategy and should consider relevant advice within Local Air Quality Management guidance and PM2.5 targets guidance.	**Section 16.2** of **Chapter 16, Other Environmental Topics of the ES [AS-016]** concludes that there are no anticipated significant effects on air quality as a result of the Scheme. A **Framework CEMP [APP-238]** and **Framework DEMP [APP-240]** include mitigation measures from the IAQM dust guidance. A detailed CEMP and DEMP will be prepared prior to the decommissioning, and their implementation will be secured by a requirement in Schedule 2 of the DCO.
Paragraph 5.2.15	Many activities involving air emissions are subject to pollution control. The considerations set out in Section 4.12 on the interface between planning and pollution control therefore apply. The 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 2023.	
Paragraph 5.2.16	The Secretary of State should give air quality considerations substantial weight where a project would lead to a deterioration in air quality. This could for example include where an area breaches any national air quality limits or statutory air quality objectives. However, air quality considerations will also be important where substantial changes in air quality levels are expected, even if this does not lead to any breaches statutory limits, objectives or targets.	**Section 16.2** of **Chapter 16, Other Environmental Topics of the ES [AS-016]** concludes that there are no anticipated significant adverse effects on air quality as a result of the Scheme. A **Framework CEMP [APP-238]** and **Framework DEMP [APP-240]** include mitigation measures from the IAQM dust guidance. A detailed CEMP and DEMP will be prepared prior to the decommissioning, and their implementation will be secured by a requirement in Schedule 2 of the DCO.
Paragraph 5.2.17	The Secretary of State should give air quality considerations substantial weight where a project is proposed near a sensitive receptor site, such as an education or healthcare facility, residential use or a sensitive or protected habitat.	**Section 16.2** of **Chapter 16, Other Environmental Topics of the ES [AS-016]** 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.
Paragraph 5.2.18	Where a project is proposed near to a sensitive receptor site for air quality, if the applicant cannot provide justification for this location, and a suitable mitigation plan, the Secretary of State should refuse consent.	The 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. However, the implementation of the mitigation measures, set out in the **Framework CEMP [APP-238],** 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 impacts. Residual effects are therefore assessed as being not significant.
Paragraph 5.2.19	In all cases, the Secretary of State must take account of any relevant statutory air quality limits, objectives and targets. If a project will lead to non-compliance with a statutory limit, objective or target the Secretary of State should refuse consent.	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.	**Section 16.2** of **Chapter 16, Other Environmental Topics of the ES [AS-016]** assesses the effects of the Scheme on emissions or odour and dust.

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
		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 [AS-016]**. 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 [APP-238].**
Paragraph 5.7.11	A construction management plan may help clarify and secure mitigation	A **Framework CEMP [APP-238]** is included within the DCO application. The **Framework CEMP [APP-238]** will be developed into a detailed CEMP prior to the construction phase commences as a means to secure embedded mitigation measures and best practice, and be secured by a requirement in Schedule 2 2 of the DCO.
Paragraph 5.7.12	The Secretary of State should satisfy itself that: • an assessment of the potential for ….dust, 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 [AS-016]**. 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 [APP-238].**
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 4.3). This should include: • A whole life GHG assessment showing construction, operational and decommissioning GHG impacts, including impacts from change of land use. • An explanation of the steps that have been taken to drive down the climate change impacts at each of those stages. • Measurement of embodied GHG impact from the construction stage. • How reduction in energy demand and consumption during operation has been prioritised in comparison with other measures. • How operational emissions have been reduced as much as possible through the application of best available techniques for that type of technology. • Calculation of operational energy consumption and associated carbon emissions.	**Chapter 6: Climate Change, ES Volume 1 [APP-058]** 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. GHG mitigation measures are outlined in the Embedded Mitigation (Section 6.6) of **Chapter 6: Climate Change, ES Volume 1 [APP-058]**. A **Framework CEMP [APP-238]** is included within the DCO application. This identifies various mitigation measures to be embedded within the Scheme to reduce the GHG impact. A **Framework OEMP [APP-239]** 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.

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
	• Whether and how any residual GHG emissions will be (voluntarily) offset or removed using a recognised framework. • Where there are residual emissions, the level of emissions and the impact of those on national and international efforts to limit climate change, both alone and where relevant in combination with other developments at a regional or national level, or sector level, if sectoral targets are developed	
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 creation, hedgerow creation and restoration, 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 [APP-058]** 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.
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		

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
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 [APP-2322],** has been undertaken and was submitted with the DCO Application. Natural England have been consulted with regard to the Appropriate Assessment in accordance with this policy. The Applicant has continued to consult Natural England regarding the HRA, and as such an updated HRA will be submitted during the Examination to reflect discussions held during the pre-examination period. The Applicant's appropriate assessment, set out in the updated 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 43.75ha of mitigation habitat will be provided. 28.75ha of wet grassland will be provided for Golden Plover and 15ha of arable land maintained under a suitable cropping regime and management practices for pink-footed goose in the north west part of the Scheme. This would deliver adequate habitat to offset the loss of arable farmland used by golden plover and pink-footed goose. Overall, the updated 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.
Paragraph 5.4.5	As a matter of policy, the following should be given the same protection as sites covered by the Habitats Regulations and an HRA will also be required: (a) potential Special Protection Areas and possible Special Areas of Conservation; (b) listed or proposed Ramsar sites and (c) sites identified, or required, as compensatory measures for adverse effects on any of the other sites covered by this paragraph.	
Paragraph 5.4.8	Development on land within or outside a SSSI, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits (including need) of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of SSSIs.	**Chapter 8: Ecology, ES Volume 1 [APP-060]** 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. Measures will be implemented to minimise visual, lighting and noise disturbance. These are outlined in the **Framework CEMP [APP-238]** 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 [APP-060]** 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. 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 [APP-233]**). **Chapter 8: Ecology, ES Volume 1 [APP-060]** 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 [APP-060]** 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 5.4.13	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.	

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
Paragraph 5.4.15	Ancient woodland is a valuable biodiversity resource both for its diversity of species and for its longevity as woodland. Keeps of Time, the government's policy for ancient and native trees and woodlands in England sets out the government's commitment to maintain and enhance the existing area of ancient woodland, maintain and enhance the existing resource of known ancient and veteran trees, excluding natural losses from disease and death, and to increase the percentage of ancient woodland in active. Ancient or veteran trees found outside ancient woodland are also particularly valuable. Other types of irreplaceable habitats include blanket bog, limestone pavement, coastal sand dunes, spartina salt marsh swards, mediterranean saltmarsh scrub, and lowland fen.	**Chapter 8: Ecology, ES Volume 1 [APP-060]** 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 [APP-102],** 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 [APP-060]** 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 [APP-060]** 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. Section 8.7 of **Chapter 8: Ecology, ES Volume 2 [APP-060]** 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 [APP-060]** no residual significant adverse effects have been identified on any internationally, nationally or locally designated sites during construction, operation or decommissioning of the Scheme. The scope of the ES accords with this policy.
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.	
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 [APP-060]** 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, minimum buffers from key habitat features have been applied where practicable, as set out in **Chapter 8: Ecology, ES Volume 1 [APP-060].** In addition, as noted above, **Chapter 8: Ecology, ES Volume 1 [APP-060]** and the **HRA [APP-244]** 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 total of 43.75ha of mitigation habitat will be provided. 28.75ha of wet grassland will be provided for Golden Plover and 15ha of arable land maintained under a suitable cropping regime and management practices for pink-footed goose in the north west part of the Scheme. This would 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.
Paragraph 5.4.20	Applicants should consider wider ecosystem services and benefits of natural capital when designing enhancement measures.	
Paragraph 5.4.21	As set out in Section 4.7, the design process should embed opportunities for nature inclusive design. Energy infrastructure projects have the potential to deliver significant benefits and enhancements beyond Biodiversity Net Gain, which result in wider environmental gains (see Section 4.6 on Environmental and Biodiversity Net Gain). The scope of potential gains will be dependent on the type, scale, and location of each project.	

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
		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 [APP-060]** 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 [APP-233]** 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 Biodiversity Net Gain (BNG) report using Natural England's Biodiversity Metric 4.0 has been updated for Deadline 1 of the Examination. This report demonstrates that the Scheme will deliver 80.42% BNG for area-based units, 10.30% BNG for hedgerow units and 10.09% BNG for watercourse units. Therefore, the Scheme delivers significant biodiversity net gain on the site, with at least 10% BNG across the whole Site. .
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.	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 [APP-060]**. **Section 8.8 and 8.9 of Chapter 8: Ecology, ES Volume 1 [APP-060]** and the updated 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 43.75ha of mitigation habitat will be provided. 28.75ha of wet grassland will be provided for Golden Plover and 15ha of arable land maintained under a suitable cropping regime and management practices for pink-footed goose in the north west part of the Scheme. This would deliver adequate habitat to offset the loss of arable farmland used by golden plover and pink-footed goose.. 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.
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 HRA Appropriate Assessment (AA) is required. Applicants can request and agree 'Evidence Plans' with SNCBs, which is a way to record upfront the information the applicant needs to supply with its application, so that the HRA can be efficiently carried out. If an AA is required, the applicant must provide the Secretary of State with such information	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 [APP-244]**. 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. Following further engagement with Natural England during the pre-examination phase of the DCO, the Applicant has updated the HRA and it will be submitted during the Examination, to reflect discussions that have taken place.

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
	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	
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 habitat sites, the applicant must include with their application such information as may reasonably be required to assess a potential derogation under the Habitats Regulations.	The **HRA [APP-244]** has been undertaken to inform the ES and is included with the DCO submission. An updated HRA will be submitted during the Examination. 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 updated HRA concludes that the Scheme will not result in adverse effects on the integrity of any European sites. Therefore, information regarding a derogation under the Habitats Regulations is not required.
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.	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 [APP-244] 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, there are no environmental compensation requirements to be considered. An updated HRA will be submitted during the Examination.
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. Applicants should engage with the relevant Local Planning Authority at an early stage regarding the proposed location of compensatory measures. Applicants should also take account of any strategic plan level compensation plans in developing project level compensation plans.	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. A Statement of Common Ground is being prepared with Natural England to ensure matters are agreed where possible, of which a draft version will be submitted at Deadline 1 of the Examination.
Paragraph 5.4.32	Applicants should include measures to mitigate fully the direct and indirect effects of development on ancient woodland, ancient and	**Chapter 8: Ecology, ES Volume 1 [APP-060]** concludes that there would be no loss of ancient woodland, or veteran or ancient trees as a result of the Scheme.

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
	veteran trees or other irreplaceable habitats during both construction and operational phase.	As detailed in **Appendix 10-5: Arboricultural Impact Assessment and Tree Protection Report, ES Volume 2 [APP-102],** 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 [APP-060]** 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 5.4.33	Applicants should consider any reasonable opportunities to maximise the restoration, creation, and enhancement of wider biodiversity, and the protection and restoration of the ability of habitats to store or sequester carbon as set out under Section 4.6.	**As set out in Chapter 8: Ecology, ES Volume 1 [APP-060]** 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. In addition, as noted above, **Chapter 8: Ecology, ES Volume 1 [APP-060] and the HRA [APP-244]** 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. A total of 43.75ha of mitigation habitat will be provided. 28.75ha of wet grassland will be provided for Golden Plover and 15ha of arable land maintained under a suitable cropping regime and management practices for pink-footed goose in the north west part of the Scheme. This would 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 [APP-060]** 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 [APP-233]** 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 Biodiversity Net Gain (BNG) report using Natural England's Biodiversity Metric 4.0 has been updated for Deadline 1 of the Examination. This report demonstrates that the Scheme will deliver 80.42% BNG for area-based units, 10.30%
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 Environment Act 2021 and the Environment Improvement Plan 2023.	

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
		BNG for hedgerow units and 10.09% BNG for watercourse units. Therefore, the Scheme delivers significant biodiversity net gain on the site, with at least 10% BNG across the whole Site.
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 • 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. • Mitigations required as a result of legal protection of habitats or species will be compiled with	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 [APP-0608]** and are illustrated within the **Framework CEMP [APP-238], Framework OEMP [APP-239]** and **Framework DEMP [APP-240]**. These 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. Production of a detailed CEMP, OEMP and DEMP are will be secured by the DCO. The **Framework CEMP [APP-238]** 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 [APP-060]** outlines mitigation measures pertaining to habitat avoidance, creation and replacement measures that comply with this part of the policy.
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.	The management of biodiversity throughout the life of the Scheme is covered by the **Framework CEMP [APP-238]**, **Framework OEMP [APP-239]** and **Framework DEMP [APP-240].** These will inform a detailed CEMP, OEMP and DEMP with which the Scheme will comply with. The **Framework CEMP [APP-238]**, 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, surface water management, pollution, air quality and noise.
Paragraph 5.4.39	The government's 25 Year Environment Plan and the Environment Act 2021 mark a step change in ambition for wildlife and the natural environment. The Secretary of State should have regard to the aims and goals of the government's Environmental Improvement Plan and any relevant measures and targets, including statutory targets set under the Environment Act or elsewhere	**Chapter 8: Ecology, ES Volume 2 [APP-060]** 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 [APP-233]** which will inform a detailed LEMP, which will be secured by a requirement in Schedule 2 of the DCO. The Applicant has also considered the Environment Act 2021, as evidenced by the updated **Biodiversity Net Gain Assessment.** It is therefore considered that the Scheme is compliant with this policy.

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
		As a nationally significant NSIP, the Scheme also contributes to climate change mitigation, which in turn is beneficial for biodiversity and geological conservation interests.
Paragraph 5.4.41	The benefits of nationally significant low carbon energy infrastructure development may include benefits for biodiversity and geological conservation interests and these benefits may outweigh harm to these interests. The Secretary of State may take account of any such net benefit in cases where it can be demonstrated.	The Scheme provides biodiversity benefits as a result of its embedded mitigation and enhancement measures, as set out in the **Framework LEMP [APP-233].** In addition, with these measures implemented, there are not anticipated to be any significant adverse impacts on biodiversity features. The Biodiversity Net Gain (BNG) report using Natural England's Biodiversity Metric 4.0 has been updated for Deadline 1 of the Examination. This report demonstrates that the Scheme will deliver 80.42% BNG for area-based units, 10.30% BNG for hedgerow units and 10.09% BNG for watercourse units. Therefore, the Scheme delivers significant biodiversity net gain on the site, with at least 10% BNG across the whole Site.
Paragraph 5.4.42	As a general principle, and subject to the specific policies below, development should, in line with the mitigation hierarchy, aim to avoid significant harm to biodiversity and geological conservation interests, including through consideration of reasonable alternatives (as set out in Section 4.3 above). Where significant harm cannot be avoided, impacts should be mitigated and as a last resort, appropriate compensation measures should be sought.	As outlined in **Chapter 8: Ecology, ES Volume 2 [APP-060]** 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. Embedded design mitigation measures are outlined in Section 8.6 of **Chapter 8: Ecology, ES Volume 2 [APP-060]** and additional mitigation measures are outlined in section 8.8 of **Chapter 8: Ecology, ES Volume 2 [APP-060]**.
Paragraph 5.4.43	If significant harm to biodiversity resulting from a development cannot be avoided (for example through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then the Secretary of State will give significant weight to any residual harm.	The measures are illustrated within the **Framework CEMP [APP-238], Framework OEMP [APP-239]** and **Framework DEMP [APP-240]**. These 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. Production of a final CEMP, OEMP and DEMP will be secured by the DCO.
Paragraph 5.4.44	The Secretary of State should consider what appropriate requirements should be attached to any consent and/or in any planning obligations entered into, in order to ensure that any mitigation or biodiversity net gain measures, if offered, are delivered and maintained. Any habitat creation or enhancement delivered including linkages with existing habitats for compensation or biodiversity net gain should generally be maintained for a minimum period of 30 years, or for the lifetime of the project, if longer.	The **Framework CEMP [APP-238], Framework OEPM [APP-239], Framework DEMP [APP-240],** updated BNG Report and **Framework LEMP [APP-233],** set out measures to mitigate impacts and achieve at least 10% BNG. The management plans will be developed into detailed documents which will be secured by the DCO.
Paragraph 5.4.46	Development proposals provide many opportunities for building-in beneficial biodiversity or geological features as part of good design. The Secretary of State should give appropriate weight to environmental and biodiversity enhancements, although any weight given to gains provided to meet a legal requirement (for example under the Environment Act 2021) is likely to be limited.	As detailed in the **Design and Access Statement [APP-234]**, 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 and principles are described in **Design and Access Statement [APP-234]** and **Design Principles Statement [APP-235].**
Paragraph 5.4.47	When considering proposals, the Secretary of State should maximise such reasonable opportunities in and around developments, using requirements or planning obligations where	

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	appropriate. This can help towards delivering biodiversity net gain as part of or in addition to the approach set out at Section 4.6.	The Biodiversity Net Gain (BNG) report using Natural England's Biodiversity Metric 4.0 has been updated for Deadline 1 of the Examination. This report demonstrates that the Scheme will deliver 80.42% BNG for area-based units, 10.30% BNG for hedgerow units and 10.09% BNG for watercourse units. Therefore, the Scheme delivers significant biodiversity net gain on the site, with at least 10% BNG across the whole Site.
Paragraph 5.4.48	In taking decisions, the Secretary of State should ensure that appropriate weight is attached to designated sites of international, national, and local importance; protected species; habitats and other species of principal importance for the conservation of biodiversity; and to biodiversity and geological interests within the wider environment.	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 [APP-060].**
Paragraph 5.4.49	The Secretary of State must consider whether the project is likely to have a significant effect on a protected site which is part of the National Site Network (an habitat site), a protected marine site, or on any site to which the same protection is applied as a matter of policy, either alone or in combination with other plans or projects.	The **HRA [APP-243]** 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 [APP-244]** continues to use the 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. The **HRA [APP-244]** concludes that the Scheme would not result in any significant effects to the Lower Derwent Valley SPA/Ramsar and Humber Estuary SPA/Ramsar. The HRA has been updated and will be submitted during the Examination. The above statements still apply. 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.
Paragraph 5.4.50	The Secretary of State should use requirements and/or planning obligations to mitigate the harmful aspects of the development and, where possible, to ensure the conservation and enhancement of the site's biodiversity or geological interest.	The Ecology chapter of the ES **Chapter 8: Ecology, ES Volume 6 [APP-060]** 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 includes embedded mitigation measures which aim to conserve and enhance biodiversity conservation interests.
Paragraph 5.4.52	The Secretary of State should give due consideration to regional or local designations. However, given the need for new nationally significant infrastructure, these designations should not be used in themselves to refuse development consent.	The assessment in Section 8.7 of **Chapter 8: Ecology, ES Volume 2 [APP-060]** of the likely significant impacts of the Scheme on designated sites and concludes that there are no 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 5.4.53	The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists.	**Chapter 8: Ecology, ES Volume 1 [APP-060]** 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 [APP-102],** 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 [APP-060]** 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

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		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 [APP-060]** 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): a. 15m from woodlands (some cabling will lie within 15m of woodland); b. 10m from hedgerows increasing to 15m where there are hedgerow trees; and c. 15m from individual trees.
Paragraph 5.4.54	The Secretary of State should ensure that species and habitats identified as being of importance for the conservation of biodiversity are protected from the adverse effects of development by using requirements, planning obligations, or licence conditions where appropriate.	There would be no residual significant adverse effects on any species and habitats as a result of the Scheme.
Paragraph 5.4.55	The Secretary of State should refuse consent where harm to a protected species and relevant habitats would result, unless there is an overriding public interest and other relevant legal tests are met. In this context the Secretary of State should give substantial weight to any such harm to the detriment of biodiversity features of national or regional importance or the climate resilience and the capacity of habitats to store carbon, which it considers may result from a proposed development	There would be no residual significant adverse effects on any species and habitats as a result of the Scheme. The Biodiversity Net Gain (BNG) report using Natural England's Biodiversity Metric 4.0 has been updated for Deadline 1 of the Examination. This report demonstrates that the Scheme will deliver 80.42% BNG for area-based units, 10.30% BNG for hedgerow units and 10.09% BNG for watercourse units. Therefore, the Scheme delivers significant biodiversity net gain on the site, with at least 10% BNG across the whole Site.
Aviation		
Paragraph 5.5.5	UK airspace is important for both civilian and military aviation interests. Its capabilities are not adversely affected by new energy infrastructure. Likewise, it is essential that aerodromes, aircraft, air systems and airspace operators work collaboratively with energy infrastructure developers essential for net zero.	The Applicant consulted with the MoD, CAA, NATS, Breighton 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 5.5.37	Where the proposed development may affect the performance of civil or military aviation CNS, meteorological radars and/or other defence assets an assessment of potential effects should be set out in the ES (see Section 4.3).	This is taken account of in the glint and glare assessment, and a summary is presented in section 16.3 of **Chapter 16: Other Environmental Topics ES Volume 1 [APP-068].**
Paragraph 5.5.41	In addition, consideration of developments near aerodromes should take into account the following–factors - Bird Strike Risk - Aircraft are vulnerable to wildlife strike, in particular bird strike. Birds and other wildlife may be attracted to the vicinity of an aerodrome by various types of development, for example, large buildings with	**Chapter 8: Ecology, ES Volume 1 [APP-080]** takes account of impacts to birds. There are no buildings proposed as part of the Scheme, therefore building turbulence has not been assessed. The Scheme does not include cooling systems, therefore thermal plume turbulence is not considered to be relevant.

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	perching/roosting opportunities for birds. It is therefore important that 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. - 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.	
Paragraph 5.5.49	The Secretary of State should be satisfied that the effects on meteorological radars, civil and military aerodromes, aviation technical sites and other defence assets or operations have been addressed by the applicant and that any necessary assessment of the proposal on aviation, NSWWS or defence interests has been carried out.	This is taken account in the glint and glare assessment, and a summary is presented in **Chapter 16: Other Environmental Topics ES Volume 1 [APP-068]**
Paragraph 5.5.50	In particular, the Secretary of State should be satisfied that the proposal has been designed, where possible, to minimise adverse impacts on the operation and safety of aerodromes and that realistically achievable mitigation is carried out on existing surveillance systems such as radar / tracking technologies. It is incumbent on Operators of aerodromes to regularly review the possibility of agreeing to make reasonable changes to operational procedures	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 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 has no safeguarding objection to the proposal. Section 16.3 of **Chapter 16: Other environmental topics, ES Volume 1 [APP-068**] 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 Breighton Airfield. Only ‘Green Glare’ impacts (which is where there is a low potential for an ‘after image’) were predicted for Runway 28 at Breighton Airfield, which is an acceptable impact upon runways according to FAA guidance. The other receptors experience no impact. Section 16.3 of **Chapter 16: Other environmental topics, ES volume 1 [APP-068]** 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 17-1, ES Volume 2 [APP-125]** 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 [APP-025].**

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Paragraph 5.5.55	Lighting must also be designed in such a way as to ensure that there is no glare or dazzle to pilots and/or ATC, aerodrome ground lighting is not obscured and that any lighting does not diminish the effectiveness of aeronautical ground lighting and cannot be confused with aeronautical lighting. Lighting may also need to be compatible with night vision devices for military low flying purposes.	The lighting strategy is discussed in detail in **Chapter 2: The Scheme, ES Volume 1 [APP-054]** and construction phase measures are further outlined in the **Framework CEMP [APP-238]**. There will be minimal lighting as a result of the Scheme. Section 16.3 of **Chapter 16: Other environmental topics, ES Volume 1 [APP-068]** 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 Breighton Airfield. Only 'Green Glare' impacts (which is where there is a low potential for an 'after image') were predicted for Runway 28 at Breighton Airfield, which is an acceptable impact upon runways according to FAA guidance. The other receptors experience no impact. Section 16.3 of **Chapter 16: Other environmental topics, ES volume 1 [APP-068]** 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 17-1, ES Volume 2 [APP-125]** 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 [APP-025].**
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.	**Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 [APP-061],** and **Flood Risk Assessment** (FRA) **Appendix 9-3, ES Volume 2 [APP-097]** 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 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 [APP-098]** incorporating SuDS has been prepared to manage these flow paths to ensure that the development remains safe throughout its lifetime.
Paragraph 5.8.9	If, following application of the Sequential Test, it is not possible, (taking into account wider sustainable development objectives), for the project to be located in areas of lower flood risk the Exception Test can be applied, as defined in *https://www.gov.uk/guidance/flood-risk-and-coastal-change#table2.* 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	A **FRA** is provided at **Appendix 9-3, ES Volume 2 [APP-097].** This demonstrates how the development passes the Sequential Test including its application at the site level. 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.
Paragraph 5.8.10	The Exception Test is only appropriate for use where the Sequential Test alone cannot deliver an acceptable site. It would only be appropriate to move onto the Exception Test when the Sequential Test has identified reasonably available, lower risk sites appropriate for the proposed development where, accounting for wider sustainable development objectives, application of relevant policies would provide a clear reason for refusing development in any	The **Sequential Test Report** appended to the **FRA [APP-096],** 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. 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 [APP-055],** 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

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	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	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.
Paragraph 5.8.11	Both elements of the Exception Test will have to be satisfied for development to be consented. To pass the Exception Test it should be demonstrated that: • The project would provide wider sustainability benefits to the community that outweigh flood risk; and • the project will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible will reduce flood risk overall.	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 [APP-098]** incorporating SuDS has been prepared to manage these flow paths to ensure that the development remains safe throughout its lifetime. The **FRA [APP-097]** 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 [APP-098**], to ensure that the project is appropriately flood resilient and resistant. The **Framework CEMP [APP-238]** 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.
Paragraph 5.8.12	Development should be designed to ensure there is no increase in flood risk elsewhere, accounting for the predicted impacts of climate change throughout the lifetime of the development. There should be no net loss of floodplain storage and any deflection or constriction of flood flow routes should be safely managed within the site. Mitigation measures should make as much use as possible of natural flood management techniques.	**Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 [APP-061], and Flood Risk Assessment** (FRA) **Appendix 9-3, ES Volume 2 [APP-097]** 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 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 Scheme, with flood compensation proposed along the edge of Flood Zone 3. 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 [APP-061].**
Paragraph 5.8.13	A site-specific flood risk assessment should be provided for all energy projects in Flood Zones 2 and 3 in England or Zones B and C in Wales. In Flood Zone 1 in England or Zone A in Wales, an assessment should accompany all proposals involving: • sites of 1 hectare or more • land which has been identified by the EA or NRW as having critical drainage problems • land identified (for example in a local authority strategic flood risk assessment) as being at increased flood risk in future • land that may be subject to other sources of flooding (for example surface water) • where the EA or NRW, Lead Local Flood Authority, Internal Drainage Board or other body have indicated that there may be drainage problems.	A **FRA** is provided at **Appendix 9-3, ES Volume 2 [APP-097].** 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 5.8.15.

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
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.	
Paragraph 5.8.15	The minimum requirements for Flood Risk Assessments (FRA) are that they should: • be proportionate to the risk and appropriate to the scale, nature and location of the project; • consider the risk of flooding arising from the project in addition to the risk of flooding to the project; • take the impacts of climate change into account, across a range of climate scenarios, clearly stating the development lifetime over which the assessment has been made • be undertaken by competent people, as early as possible in the process of preparing the proposal; • consider both the potential adverse and beneficial effects of flood risk management infrastructure, including raised defences, flow channels, flood storage areas and other artificial features, together with the consequences of their failure and exceedance; • consider the vulnerability of those using the site, including arrangements for safe access and escape; • consider and quantify the different types of flooding (whether from natural and human sources and including joint and cumulative effects) and include information on flood likelihood, speed-of-onset, depth, velocity, hazard and duration; • identify and secure opportunities to reduce the causes and impacts of flooding overall, making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management; • consider the effects of a range of flooding events including extreme events on people, property, the natural and historic environment and river and coastal processes; • include the assessment of the remaining (known as ‘residual’) risk after risk reduction measures have been taken into account and demonstrate that these risks can be safely managed, ensuring people will not be exposed to hazardous flooding;	

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
	• 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: i. Describe the existing surface water drainage arrangements for the site ii. Set out (approximately) the existing rates and volumes of surface water run-off generated by the site. Detail the proposals for restricting discharge rates iii. Set out proposals for managing and discharging surface water from the site using sustainable drainage systems and accounting for the predicted impacts of climate change. If sustainable drainage systems have been 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. vi. Explain how sustainable drainage systems have been integrated with other aspects of the development such as open space or green infrastructure, so as to ensure an efficient use of the site vii. Describe the multifunctional benefits the sustainable drainage system will provide viii. Set out which opportunities to reduce the causes and impacts of flooding have been identified and included as part of the proposed sustainable drainage system ix. Explain how run-off from the completed development will be prevented from causing an impact elsewhere x. Explain how the sustainable drainage system been designed to facilitate maintenance and, where relevant, adoption. Set out plans for ensuring an acceptable standard of operation and maintenance throughout the lifetime of the development • detail those measures that will be included to ensure the development will be safe and remain operational during a flooding event throughout the development's lifetime without increasing flood risk elsewhere; • identify and secure opportunities to reduce the causes and impacts of flooding overall during the period of construction; and	

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
	• be supported by appropriate data and information, including historical information on previous events	
Paragraph 5.8.17	Development (including construction works) will need to account for any existing watercourses and flood and coastal erosion risk management structures or features, or any land likely to be needed for future structures or features so as to ensure: • Access, clearances and sufficient land are retained to enable their maintenance, repair, operation, and replacement, as necessary •Their condition or structural integrity is not reduced	**Chapter 9: Flood Risk, Drainage and Surface Water, ES Volume 1 [APP-061]** 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 submitted **Framework Surface Water Drainage Strategy Appendix 9-4, ES Volume 2 [APP-098]**, 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. Mitigation measures for trenchless crossings of watercourses are stated within the Framework CEMP **[APP-238].** A detailed CEMP (which must substantially accord with the Framework CEMP) will need to be approved post consent prior to construction with the relevant local authorities and this is secured by a requirement in Schedule 2 to the draft DCO **[AS-008].** This includes the commitment from the Applicant to seek information from the EA on the construction details of the flood defence embankments that may need to be crossed. This will inform the approach for directional drilling beneath the Rivers Ouse and Derwent and associated flood defences. The current approach for directional drilling beneath the Rivers Ouse and Derwent and associated flood defences includes a minimum 16 m buffer between HDD send or receive pits from the landward toe of flood defences, as specified in the Framework CEMP **[APP-238].** Following an information request from the Applicant, the EA provided further information on the embankments of the Esk and Derwent catchment and the Ouse catchment. The Environment Agency also noted there is no as built or specific information regarding the flood embankments affected due to their age. The Applicant will continue to engage with the EA throughout the detailed design stage of the Scheme. The protective provisions at Part 5 of Schedule 14 of the draft DCO **[AS-008]** require the Applicant to obtain the EA's prior approval for plans of specified works before commencing construction of those works. This would include the plan of works for crossing of main rivers.
Paragraph 5.8.18	Applicants for projects which may be affected by, or may add to, flood risk should arrange pre-application discussions before the official pre-application stage of the NSIP process with the EA or NRW, and, where relevant, other bodies such as Lead Local Flood Authorities, Internal Drainage Boards, sewerage undertakers, navigation authorities, highways authorities and reservoir owners and operators.	A FRA is provided at **Appendix 9-3, ES Volume 2 [APP-097].** 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: 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; and h. The Environment Agency.
Paragraph 5.8.19	Such discussions should identify the likelihood and possible extent and nature of the flood risk, help scope the FRA, and identify the information that will be required by the Secretary of State to reach a decision on the application when it is submitted. The Secretary of State should advise applicants to undertake these steps where they appear necessary but have not yet been addressed.	
Paragraph 5.8.20	If the EA, NRW or another flood risk management authority has reasonable concerns about the proposal on flood risk grounds, the	

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
	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.	
Paragraph 5.8.21	The Sequential Test ensures that a sequential, risk-based approach is followed to steer new development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account. Where it is not possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites with medium risk areas and then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas	**The FRA [APP-097], 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.
Paragraph 5.8.23	Consideration of alternative sites should take account of the policy on alternatives set out in Section 4.3 above. All projects should apply the Sequential Test to locating development within the site	
Paragraph 5.8.24	To satisfactorily manage flood risk, arrangements are required to manage surface water and the impact of the natural water cycle on people and property.	**Chapter 9: Flood Risk, Drainage and Surface Water, ES Volume 1 [APP-061]** 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.
Paragraph 5.8.25	In this NPS, the term SuDS refers to the whole range of sustainable approaches to surface water drainage management including, where appropriate: 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 flood routes to carry and direct excess water through developments to minimise the impact of severe rainfall flooding	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 [APP-098]** 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. The Scheme would be constructed, operated and decommissioned using best practice and comply with environmental legislation through the application of a detailed CEMP, OEMP, and DEMP which will be secured by the DCO, including appropriate use and maintenance of SuDS and other drainage infrastructure.
Paragraph 5.8.26	Site layout and surface water drainage systems should cope with events that exceed the design capacity of the system, so that	The **Framework Surface Water Drainage Strategy, Appendix 9-4, ES Volume 2 [APP-098]** sets out the strategy for surface water and drainage, and will be secured by requirements of the DCO. This states that states that the proposed

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
	excess water can be safely stored on or conveyed from the site without adverse impacts	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 5.8.27	The surface water drainage arrangements for any project should, accounting for the predicted impacts of climate change throughout the development's lifetime, be such that the volumes and peak flow rates of surface water leaving the site are no greater than the rates prior to the proposed project, unless specific off-site arrangements are made and result in the same net effect.	
Paragraph 5.8.28	It may be necessary to provide surface water storage and infiltration to limit and reduce both the peak rate of discharge from the site and the total volume discharged from the site. There may be circumstances where it is appropriate for infiltration facilities or attenuation storage to be provided outside the project site, if necessary, through the use of a planning obligation.	
Paragraph 5.8.29	The sequential approach should be applied to the layout and design of the project. Vulnerable aspects of the development should be located on parts of the site at lower risk and residual risk of flooding. Applicants should seek opportunities to use open space for multiple purposes such as amenity, wildlife habitat and flood storage uses. Opportunities should be taken to lower flood risk by reducing the built footprint of previously developed sites and using SuDS	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 Scheme, with flood compensation proposed along the edge of Flood Zone 3. 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. 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 [APP-061].** **The FRA [APP-097], 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. The **Framework Surface Water Drainage Strategy, Appendix 9-4, ES Volume 2 [APP-098]** 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.
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.	
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.	

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
Paragraph 5.8.32	Where development may contribute to a cumulative increase in flood risk elsewhere, the provision of multifunctional sustainable drainage systems, natural flood management and green infrastructure can also make a valuable contribution to mitigating this risk whilst providing wider benefits.	**Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 [APP-061]** 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. 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.
Paragraph 5.8.33	The receipt of and response to warnings of floods is an essential element in the management of the residual risk of flooding. Flood Warning and evacuation plans should be in place for those areas at an identified risk of flooding.	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 [APP-097]).**
Paragraph 5.8.34	The applicant should take advice from the local authority emergency planning team, emergency services and, where appropriate, from the local resilience forum when producing an evacuation plan for a manned energy project as part of the FRA. Any emergency planning documents, flood warning and evacuation procedures that are required should be identified in the FRA	
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 [APP-234]**.
Paragraph 5.8.36	In determining an application for development consent, the Secretary of State should be satisfied that where relevant: • the application is supported by an appropriate FRA • the Sequential Test has been applied and satisfied as part of site selection • a sequential approach has been applied at the site level to minimise risk by directing the most vulnerable uses to areas of lowest flood risk • the proposal is in line with any relevant national and local flood risk management strategy • SuDS (as required in the next paragraph on National Standards) have been used unless there is clear evidence that their use would be inappropriate • in flood risk areas the project is designed and constructed to remain safe and operational during its lifetime, without increasing flood risk elsewhere (subject to the exceptions set out in paragraph 5.8.42)	A **FRA** is provided at **Appendix 9-3, ES Volume 2 [APP-097].** This demonstrates how the development passes the Sequential Test including its application at the site level. 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. The **Sequential Test Report** appended to the **FRA [APP-097],** 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. 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 [APP-055],** 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.

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
	• 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	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 [APP-098]** incorporating SuDS has been prepared to manage these flow paths to ensure that the development remains safe throughout its lifetime.
	• land that is likely to be needed for present or future flood risk management infrastructure has been appropriately safeguarded from development to the extent that development would not prevent or hinder its construction, operation or maintenance.	The FRA details embedded mitigation measures alongside the **Framework Surface Water Drainage Strategy, Appendix 9-4, ES Volume 2 [APP-098]** to ensure that the project is appropriately flood resilient and resistant. The **Framework CEMP [APP-238]** 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.
Paragraph 5.8.38	In addition, the Development Consent Order, or any associated planning obligations, will need to make provision for appropriate operation and maintenance of any SuDS throughout the project's lifetime. Where this is secured through the adoption of any SuDS features, any necessary access rights to property will need to be granted.	The **Framework OEMP [APP-239]** and **Framework Surface Water Drainage Strategy, Appendix 9-4, ES Volume 2 [APP-098]** sets out the operation and maintenance of any SuDS throughout the projects lifetime.
Paragraph 5.8.41	Energy projects should not normally be consented within Flood Zone 3b, or Zone C2 in Wales, or on land expected to fall within these zones within its predicted lifetime. This may also apply where land is subject to other sources of flooding (for example surface water). However, where essential energy infrastructure has to be located in such areas, for operational reasons, they should only be consented if the development will not result in a net loss of floodplain storage,and will not impede water flows.	**The FRA [APP-097],** 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. 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	An assessment of potential impacts resulting from the Scheme is made within section 7.7 of **Chapter 7: Cultural Heritage, ES Volume 1 [APP-059]**. 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

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
	process, even though those assets are of lesser significance than designated heritage assets.	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 [APP-059**] 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.
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 along with how the mitigation hierarchy has been applied 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 Volume1 [APP-059]** 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 [APP-080]**, including a geophysical survey and report (detailed magnetometry), **Appendix 7-3, ES Volume 2 [APP-081]**, 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 detail of these studies will be proportionate to the significance of the heritage asset affected.	**Chapter 7: Cultural Heritage, ES Volume 1 [APP-059]** 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 is discussed in Section 7.7 of **Chapter 7: Cultural Heritage, ES Volume 1 [APP-059]**. The ES also considers impacts arising from noise, vibration and lighting.
Paragraph 5.9.13	The applicant is encouraged, where opportunities exist, to prepare proposals which can make a positive contribution to the historic environment, and to consider how their scheme takes account of the	Section 7.6 of **Chapter 7: Cultural Heritage, ES Volume 1 [APP-059]** outlines the avoidance and mitigation measures embedded within the Scheme design in relation to cultural heritage.

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
	significance of heritage assets affected. This can include, where possible: • enhancing, through a range of measures such a sensitive design, the significance of heritage assets or setting affected • considering where required the development of archive capacity which could deliver significant public benefits • considering how visual or noise impacts can affect heritage assets, and whether there may be opportunities to enhance access to, or interpretation, understanding and appreciation of, the heritage assets affected by the scheme	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 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 [APP-233],** 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 [APP-059]** 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.
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.	There are no World Heritage Sites affected by the Scheme. **Section 7.7 of Chapter 7: Cultural Heritage, ES Volume 1 [APP-059]** 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. The Scheme therefore does not lead to significant adverse effects to a World Heritage Site or Conservation Area, in accordance with this policy.
Paragraph 5.9.24	In considering the impact of a proposed development on any heritage assets, the Secretary of State should consider the particular nature of the significance of the heritage assets and the value that they hold for this and future generations. This understanding should be used to avoid or minimise conflict between their conservation and any aspect of the proposal.	The particular nature of the significant of heritage assets affected by the Scheme are set out in **Chapter 7: Cultural Heritage, ES, Volume 1 [APP-059],** as well as an assessment of effects on these assets.

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
Paragraph 5.9.27	When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset's conservation. The more important the asset, the 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.	**Chapter 7: Cultural Heritage, ES Volume 1 [APP-059]** 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 5.9.28	The Secretary of State should give considerable importance and weight to the desirability of preserving all heritage assets. Any harm or loss of significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification.	**Chapter 7: Cultural Heritage, ES Volume 1 [APP-059]** 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. **Chapter 7: Cultural Heritage, ES Volume 1 [APP-059]** 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, when considered in isolation and cumulatively with other adverse effects of the Scheme.
Paragraph 5.9.29	Substantial harm to or loss of significance of a grade II Listed Building or a grade II Registered Park or Garden should be exceptional.	
Paragraph 5.9.30	Substantial harm to or loss of significance of assets of the highest significance, including Scheduled Monuments; Protected Wreck Sites; Registered Battlefields; grade I and II* Listed Buildings; grade I and II* Registered Parks and Gardens; and World Heritage Sites, should be wholly exceptional	
Paragraph 5.9.31	Where the proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset the Secretary of State should refuse consent unless it can be demonstrated that the substantial harm to, or loss of, significance is necessary to achieve substantial public benefits that outweigh that harm or loss, or all the following apply: • the nature of the heritage asset prevents all reasonable uses of the site • no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation • 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 5.9.32	Where the proposed development will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate securing its optimum viable use.	**Chapter 7: Cultural Heritage, ES Volume 1 [APP-059]** 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.

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
		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 5.9.33	In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset	**Chapter 7: Cultural Heritage, ES Volume 1 [APP-059]** 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, when considered in isolation and cumulatively with other adverse effects of the Scheme.
Paragraph 5.9.34	Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 5.9.30 or less than substantial harm under paragraph 5.9.32 as appropriate, considering the relative significance of the element affected and its contribution to the significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.	There are no World Heritage Sites affected by the Scheme. **Section 7.7 of Chapter 7: Cultural Heritage, ES Volume 1 [APP-059]** 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. The Scheme therefore does not lead to significant adverse effects to a World Heritage Site or Conservation Area, in accordance with this policy.
Paragraph 5.9.36	When considering applications for development affecting the setting of a designated heritage asset, the Secretary of State should give appropriate weight to the desirability of preserving the setting such assets and treat favourably applications that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of, the asset. When considering applications that do not do this, the Secretary of 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 [APP-059]** 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	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.

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
	minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.	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 [APP-234].** 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 [APP-233**]. This will inform a detailed LEMP which will be secured by the DCO. The landscape design principles aim to achieve the following: 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
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. Projects should be designed sensitively given the various siting, operational, and other relevant constraints. For development proposals located within designated landscapes the Secretary of State should be satisfied that measures which seek to further purposes of the designation are sufficient, appropriate and proportionate to the type and scale of the development.	The Scheme is not located within any of these designations and **Chapter 10: Landscape and Visual Amenity, ES Volume 1 [AS-014]** confirms there are no national landscape designation affected by the Scheme.
Paragraph 5.10.12	Outside nationally designated areas, there are local landscapes that may be highly valued locally. Where a local development document in England or a local development plan in Wales has policies based on landscape or waterscape character assessment, these should be paid particular attention. However, locally valued landscapes should not be used in themselves to refuse consent, as this may unduly restrict acceptable development.	**Chapter 10: Landscape and Visual Amenity, ES Volume 1 [AS-014]** 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 [AS-014]** 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. 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 5.10.13	All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites.	**Chapter 10: Landscape and Visual Amenity, ES Volume 1 [AS-014]** 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

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
Paragraph 5.10.14	The Secretary of State will have to judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the project.	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 [APP-160]**. The design mitigation which is outlined in section 10.6 of **Chapter 10: Landscape and Visual Amenity, ES Volume 1 [AS-014]**; the **Framework LEMP [APP-233] and the Design and Access Statement [APP-234]** 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 [APP-233]**, 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 5.10.16	The applicant should carry out a landscape and visual impact assessment and report it in the ES, including cumulative effects (see Section 4.3). Several guides have been produced to assist in addressing landscape issues.	A Landscape and Visual Impact Assessment has been undertaken within **Chapter 10: Landscape and Visual, ES Volume 1 [AS-014]** which includes cumulative effects**,** in accordance with Paragraph 5.10.16. **Chapter 10: Landscape and Visual, ES Volume 1 [AS-014]** references and takes into account the relevant landscape character assessment and associated studies, as well as any relevant policies based on these assessments in the local development documents as set out in **Appendix 10-1, ES Volume 2 [APP-128].**
Paragraph 5.10.17	The landscape and visual assessment should include reference to any landscape character assessment and associated studies as a means of assessing landscape impacts relevant to the proposed project. The applicant's assessment should also take account of any relevant policies based on these assessments in local development documents in England and local development plans in Wales.	
Paragraph 5.10.19	The applicant should consider landscape and visual matters in the early stages of siting and design, where site choices and design principles are being established. This will allow the applicant to demonstrate in the ES how negative effects have been minimised and opportunities for creating positive benefits or enhancement have been recognised incorporated into the design, delivery, and operation of the scheme.	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 [APP-234].** Landscape and visual matters have been considered throughout the design evolution. The **Design and Access Statement [APP-234]** details how the site was chosen, and how design objectives and principles have been developed for the Scheme.
Paragraph 5.10.20	The assessment should include the effects on landscape components and character during construction and operation. For	This is assessed in Section 10.7 – Assessment of Likely Impacts and Effects of **Chapter 10: Landscape and Visual Amenity, ES Volume 1 [AS-014].**

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
	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'	The Scheme would not affect a National Park, the Broads or Areas of Outstanding Natural Beauty.
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.	This is assessed in Section 10.7 – Assessment of Likely Impacts and Effects of **Chapter 10: Landscape and Visual Amenity, ES Volume 1 [AS-014].**
Paragraph 5.10.22	The assessment should also address the landscape and visual effects of noise and light pollution, and other emissions (see Section 5.2 and Section 5.7), from construction and operational activities on residential amenity and on sensitive locations, receptors and views, will be minimised.	Noise and light pollution have been minimised through good design and measures to reduce pollution during all stages of the Scheme in line with Design Objective 4 which states the Scheme will respond sensitively to its proximity to residential dwellings, settlements and PRoW with regard to visual impact, noise and lighting [see Design and Access Statement [APP-234]. The assessment contained in **Chapter 10: Landscape and Visual Amenity [AS-014]** 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. 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. During operation, areas of solar PV will not require artificial lighting other than during temporary periods of maintenance/repair. The lighting strategy is discussed in detail in **Chapter 2: The Scheme, ES Volume 1 [APP-054]** and construction phase measures are further outlined in the Framework CEMP **[APP-238].** The construction noise assessments presented in **Section 11.7** of **Chapter 11: Noise and Vibration, ES Volume 1 [APP-063]** 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 adverse noise or vibration effects are predicted during the operational phase. Significant adverse 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 [APP-238]** and Detailed CEMP (a requirement of the DCO).
Paragraph 5.10.24	Applicants should consider how landscapes can be enhanced using landscape management plans, as this will help to enhance environmental assets where they contribute to landscape and townscape quality.	Good design has been a key consideration from the outset with the LVIA informing the iterative design process, which is set out in the **Design and Access Statement [APP-234].** 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

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
		shown in the **Framework LEMP [APP-233].** This will inform a detailed LEMP which will be secured by a requirement of the DCO. The landscape design principles aim to achieve the following: 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
Paragraph 5.10.25	In considering visual effects it may be helpful for applicants to draw attention, in the supporting evidence to their applications, to any examples of existing permitted infrastructure they are aware of with a similar magnitude of impact on equally sensitive receptors. This may assist the Secretary of State in judging the weight they should give to the assessed visual impacts of the proposed development.	Section 10.5 Baseline Conditions of **Chapter 10: Landscape and Visual Amenity, ES Volume 1 [AS-014]** 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.
Paragraph 5.10.26	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.	Good design has been a key consideration from the outset. The Scheme has undergone an iterative design process, informed by the LVIA, set out in the **Design and Access Statement [APP-234]**. The Scheme layout has been developed in response to policy requirements, published landscape character assessment and fieldwork analysis. The design mitigation has been embedded into the Scheme to minimise effects on landscape character and visual amenity as outlined in the **Framework LEMP [APP-246]**. The landscape design principles incorporate the following: a. Careful siting in the landscape responding sensitively to its proximity to dwellings, settlements and PRoW b. Conserving the existing vegetation patterns including reinstatement and/or improvement of field boundaries c. Creating new green infrastructure including areas for woodland belts and screening d. Sensitive design in relation to form and materials
Paragraph 5.10.28	Depending on the topography of the surrounding terrain and areas of population it may be appropriate to undertake landscaping off site. For example, filling in gaps in existing tree and hedge lines may mitigate the impact when viewed from a more distant vista	The Scheme will not undertake any landscaping off site.
Paragraph 5.10.30	The Secretary of State should be satisfied that local authorities will have sufficient design content secured to ensure future consenting will meet landscape, visual and good design objectives.	The Outline Design Principles Statement **[APP-235]** and Framework LEMP **[APP-233]** will inform the detailed design and a detailed LEMP, which will secure the design of the Scheme through requirements of the DCO.
Paragraph 5.10.34	The duty to seek to further the purposes of nationally designated landscapes also applies when considering applications for projects outside the boundaries of these areas which may have impacts within them. The aim should be to avoid harming the purposes of designation or to minimise adverse effects on designated landscapes, and such projects should be designated sensitively given the various siting, operational, and other relevant constraints. The fact that a proposed project will be visible from within a	**Chapter 10: LVIA, ES Volume 1 [AS-014]** sets out the Scheme's impacts on nationally designated areas. There is not anticipated to be any adverse impacts to nationally designated landscapes as a result of the Scheme.

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
	designated area should not in itself be a reason for the Secretary of State to refuse consent	
Paragraph 5.10.35	The scale of energy projects means that they will often be across a very wide area. The Secretary of State should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project	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 [APP-234].** 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 [APP-233].** This will inform a detailed LEMP which will be secured by the DCO. The landscape design principles aim to achieve the following: 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 **Chapter 10: Landscape and Visual Amenity, ES Volume 1 [APP-058]** concludes that the likelihood of significant adverse landscape effects on NCA 39 is considered negligible. **Chapter 10: Landscape and Visual Amenity, ES Volume 1 [APP-058]** 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 character areas will experience significant effects at all the 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 5.10.36	In reaching a judgement, the Secretary of State should consider whether any adverse impact is temporary, such as during construction, and/or whether any adverse impact on the landscape will be capable of being reversed in a timescale that the Secretary of State considers reasonable.	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 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.

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
Paragraph 5.10.37	The Secretary of State should consider whether the project has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to minimise harm to the landscape, including by appropriate mitigation	The 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 [AS-014] and the Framework LEMP [APP-233].**
Paragraph 5.10.38	The Secretary of State should consider whether requirements to the consent are needed requiring the incorporation of particular design details that are in keeping with the statutory and technical requirements for landscape and visual impact.	The **Outline Design Principles Statement [APP-235]** and **Framework LEMP [APP-233]** will inform detailed Design Principles Statement and LEMP, which will secure the design of the Scheme through the DCO.
Land Use, Including Open Space, Green Infrastructure and Green Belt		
Paragraph 5.11.4	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.	**Chapter 15: Soils and Agricultural Land, ES Volume 1 [APP-067]** 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. 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 [APP-067]**, and further described in the **Framework CEMP [APP-238]** and **Framework Soil Management Plan [APP-241]** 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 [APP-067].**
Paragraph 5.11.8	The ES (see Section 4.3) should identify existing and proposed land uses near the project, any effects of replacing an existing development or use of the site with the proposed project or preventing a development or use on a neighbouring site from continuing. Applicants should also assess any effects of precluding a new development or use proposed in the development plan. The assessment should be proportionate to the scale of the preferred scheme and its likely impacts on such receptors. For developments on previously developed land, the applicant should ensure that they have considered the risk posed by land contamination and how it is proposed to address this.	**Chapter 12: Socio-Economics and Land use, ES Volume 1 [APP-064]** 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, 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 [APP-233]** 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: Cumulative Effects, ES Volume 1 [APP-069]**. 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**

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
		Statement [APP-233]. **Chapter 12: Socio economics and land use, ES Volume 1 [APP-064]** and **Appendix 12-2 Communications with Minerals Planning Authorities, ES Volume 2 [APP-108]** 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 [APP-055].** 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 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 [APP-067]** 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 [APP-058- APP-068]** and is summarised in **Chapter 17: Cumulative Effects and Interactions, ES Volume 1 [APP-069].** 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.

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
		A **Framework Soils and Management Plan [APP-241]** 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 5.11.13	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.	**Chapter 15: Soils and Agricultural Land, ES Volume 1 [APP-067]** sets out the embedded mitigation measures incorporated into the Scheme which minimise impacts on soil health and protect and improve soil quality. With regard to minimising the impact on soils further, the **Framework Soils and Management Plan [APP-241]** 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.
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	**Chapter 15: Soils and Agricultural Land, ES Volume 1 [APP-067]** concludes that there is a slight beneficial effect associated with 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.
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	**Chapter 16: Other Environmental Topics, ES Volume 1 [APP-058]** 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.
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	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 [APP-233]**. **Chapter 12: Socio economics and land use, ES Volume 1 [APP-064]** and **Appendix 12-2 Communications with Minerals Planning Authorities, ES Volume 2 [APP-108]** 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 5.11.23	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.	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 [APP-055].** 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 [APP-067]** 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.

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
		The cumulative impacts of the Scheme with other existing and proposed energy sector developments is set out in **chapters 6 – 16, ES Volume 1 [APP-58-APP-68]** and is summarised in **Chapter 17: Cumulative Effects and Interactions, ES Volume 1 [APP-069].** 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. In the EIP, the Government committed to increase the tree canopy and woodland cover to 16.5% of total land areas of England by 2050. The applicant should assess the impacts on, and loss of, all trees and woodlands within the project boundary and develop mitigation measures to minimise adverse impacts and any risk of net deforestation as a result of the scheme. Mitigation may include, but is not limited to, the use of buffers to enhance resilience, improvements to connectivity, and improved woodland management. Where woodland loss is unavoidable, compensation schemes will be required, and the long-term management and maintenance of newly planted trees should be secured.	**Chapter 8: Ecology, ES Volume 1 [APP-060]** 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 [APP-104],** 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 [APP-060]** 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 [APP-060]** 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): 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; The **Framework LEMP [APP-246]** sets out measures to manage the existing and proposed mitigation planting. A detailed LEMP will be substantially in accordance with the **Framework LEMP [APP-246]** and will be secured by a requirement in Schedule 2 of the DCO.
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.	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 [APP-233]**. **Chapter 12: Socio economics and land use, ES Volume 1 [APP-064]** and **Appendix 12-2 Communications with Minerals Planning Authorities, ES Volume 2 [APP-108]** 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.

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
		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 5.11.30	Public Rights of way, National Trails, and other rights of access to land are important recreational facilities for example for walkers, cyclists and horse riders. The Secretary of State should expect applicants to take appropriate mitigation measures to address adverse effects on coastal access, National Trails, other rights of way and open access land and, where appropriate, to consider what opportunities there may be to improve or create new access. In considering revisions to an existing right of way, consideration should be given to the use, character, attractiveness, and convenience of the right of way	The Scheme has been designed to have minimal impact on PRoW. As set out in the **Design and Access Statement [APP-234]** 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 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 [APP-233]** has been submitted alongside the application. It is anticipated that a detailed Public Right of Way Management Plan will be required post consent and will be secured by the DCO.
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.	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 [APP-055].** 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.

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
		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 EGL2 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 [APP-067]** 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 [APP-058-APP-068]** and is summarised in **Chapter 17: Cumulative Effects and Interactions, ES Volume 1 [APP-069].** 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 [APP-241]** 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 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.	**Chapter 8: Ecology, ES Volume 1 [APP-060]** 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.
Paragraph 5.12.6	Where noise impacts are likely to arise from the proposed development, the applicant should include the following in the noise assessment:	**Chapter 11: Noise and Vibration, ES Volume 1 [APP-063]** presents a noise assessment in accordance with the requirements of this policy, including a description of the noise generating aspects of the development. **Section 11.4** of **Chapter 11: Noise and Vibration, ES Volume 1 [APP-063]** describes the noise sensitive premises and areas that have been identified. Noise-sensitive sensitive receptors have been identified through a desktop study of

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
	• a description of the noise generating aspects of the development proposal leading to noise impacts, including the identification of any distinctive tonal characteristics, if the noise is impulsive, whether the noise contains particular high or low frequency content or any temporal characteristics of the noise • identification of noise sensitive receptors and noise sensitive areas that may be affected • the characteristics of the existing noise environment • a prediction of how the noise environment will change with the proposed development 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 quality of life / well-being where appropriate, particularly among those disadvantaged by other factors who ae often disproportionately affected by noise-sensitive areas • if likely to cause disturbance, an assessment of the effect of underwater or subterranean noise • all reasonable steps taken to mitigate and minimise potential adverse effects on health and quality of life	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 [APP-211].** The locations of these receptors have been considered in both the construction and operational noise assessments. **Section 11.5** of **Chapter 11: Noise and Vibration, ES Volume 1 [APP-063]** outlines the characteristics of the existing noise environment for the Scheme and surrounding areas. **Section 11.6** of **Chapter 11: Noise and Vibration, ES Volume 1 [APP-063]** describes the embedded design mitigation for the Scheme with respect to noise and vibration, encompassing the construction, operation and decommissioning phases. **Section 11.7** of **Chapter 11: Noise and Vibration, ES Volume 1 [APP-063]** 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 [APP-063].** The noise assessment is proportionate to the likely noise impact, which would be managed through the **Framework CEMP [APP-238]** during construction and would be limited by the nature of the Scheme and very small amount of traffic generated during operation.
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 [APP-238]** during construction and would be limited by the nature of the Scheme and very small amount of traffic generated during operation.
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.	The construction noise assessments presented in **Section 11.7** of **Chapter 11: Noise and Vibration, ES Volume 1 [APP-063]** 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 [APP-238]** and detailed CEMP.

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
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 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.	**Chapter 11: Noise and Vibration, ES Volume 1 [APP-063]** 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 decommissioning noise has been assessed in line with Annex E of British Standards 5228-1.
Paragraph 5.12.12	Applicants should submit a detailed impact assessment and mitigation plan as part of any development plan, including the use of noise mitigation and noise abatement technologies during construction and operation	**Chapter 11: Noise and Vibration, ES Volume 1 [APP-063**] provides a detail impact assessment and mitigation plan for noise and vibration impacts. **Chapter 11: Noise and Vibration, ES Volume 1 [APP-063],** 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.
Paragraph 5.12.13	The Secretary of State should consider whether mitigation measures are needed both for operational and construction noise over and above any which may form part of the project application. In doing so the Secretary of State may wish to impose mitigation measures. Any such mitigation measures should take account of the NPPF or any successor to it and the Planning Practice Guidance on Noise.	
Paragraph 5.12.14	Mitigation measures may include one or more of the following: • engineering: reducing the noise generated at source and/or containing the noise generated • lay-out: where possible, optimising the distance between the source and noise sensitive receptors and/or incorporating good design to minimise noise transmission through the use of screening by natural or purpose-built barriers, or other buildings • administrative: using planning conditions/obligations to restrict activities allowed on the site at certain times and/or specifying permissible noise limits/ noise levels, differentiating as appropriate between different times of day, such as evenings and late at night, and taking into account seasonality of wildlife in nearby designated sites • insulation: mitigating the impact on areas likely to be affected by noise including through noise insulation when the impact is on a building.	**Section 11.6** of **Chapter 11: Noise and Vibration, ES Volume 1 [APP-063]** details the embedded mitigation measures for the operational phase have been considered. Embedded mitigation measures that will be applied includes consideration of: a. Plant selection; 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;

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
Paragraph 5.12.15	The project should demonstrate good design through selection of the quietest or most acceptable cost-effective plant available; containment of noise within buildings wherever possible, taking into account any other adverse impacts that such containment might cause (e.g. on landscape and visual impacts; optimisation of plant layout to minimise noise emissions; and, where possible, the use of landscaping, bunds or noise barriers to reduce noise transmission)	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 [APP-063]** details the embedded mitigation measures for the operational phase have been considered. Embedded mitigation measures that will be applied includes consideration of: a. Plant selection; 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 [APP-062]** 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 [APP-063]** considers the relevant sections of the Noise Policy Statement for England, the NPPF, and the government's associated planning guidance on noise.
Paragraph 5.12.17	The Secretary of State should not grant development consent unless they are satisfied that the proposals will meet the following aims, through the effective management and control of noise: • avoid significant adverse impacts on health and quality of life from noise • mitigate and minimise other adverse impacts on health and quality of life from noise • where possible, contribute to improvements to health and quality of life through the effective management and control of noise	**Chapter 11: Noise and Vibration, ES Volume 1 [APP-063],** 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. 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. 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 the **Framework CEMP [APP-238] and Framework DEMP [APP-240].** 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 to demonstrate that noise and vibration has been minimised as far as reasonably practicable
Paragraph 5.12.18	When preparing the Development Consent Order, the Secretary of State should consider including measurable requirements or specifying the mitigation measures to be put in place to ensure that noise levels do not exceed any limits specified in the development consent. These requirements or mitigation measures may apply to the construction, operation, and decommissioning of the energy infrastructure development.	

Socio-economics Impacts

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
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 (see Section 4.3)	**Chapter 12: Socio-economics and Land Use, ES Volume 1 [APP-064]** 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 engaged with the relevant local authorities, as set out Chapter **12: Socio-economics and Land Use, ES Volume 1 [APP-064].**
Paragraph 5.13.4	The applicant's assessment should consider all relevant socio-economic impacts, which may include: • the creation of jobs and training opportunities. Applicants may wish to provide information on the sustainability of the jobs created, including where they will help to develop the skills needed for the UK's transition to Net Zero • the contribution to the development of low-carbon industries at the local and regional level as well as nationally • the provision of additional local services and improvements to local infrastructure, including the provision of educational and visitor facilities • any indirect beneficial impacts for the region hosting the infrastructure, in particular in relation to use of local support services and supply chains • effects (positive and negative) on tourism and other uses of the area impacted • 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	**Chapter 12: Socio-Economics and Land Use, ES Volume 1 [APP-064]** includes an assessment of socio-economic impacts that fulfils the requirements of this policy.

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
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 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 [APP-064]**. The Scheme's compliance with local planning policies is considered in Appendix C of the **Planning Statement [APP-233].**
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.	**Chapter 12: Socio-Economics and Land Use, ES Volume 1 [APP-064]** considers the socio-economic impact of the Scheme. **Chapter 10: Landscape and Visual, ES Volume 1 [APP-062]** 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. **Chapter 12: Socio-Economics and Land Use, ES Volume 1 [APP-064]** 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. During the construction phase, a **Framework Skills, Supply Chain and Employment Plan APP-247]** 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.
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	Chapter 12: Socio Economic and Land Use, ES Volume 1 [APP-064] 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. 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. As such, 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.	**Chapter 12: Socio-economics and Land Use, ES Volume 1 [APP-064]** 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. The Scheme has been designed to the principles of good design, as set out in **Chapter 10: LVIA, ES Volume 1 [APP-062]** and the **Design and Access Statement [APP-234].**
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 [APP-064]** provides an assessment of the potential socio-economic impacts of the Scheme. 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. **Chapter 12: Socio-economics and Land Use, ES Volume 1 [APP-064]** 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. The jobs created will be in the renewable energy sector, specifically

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
		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. **Chapter 12: Socio-economics and Land Use, ES Volume 1 [APP-064]** and **Chapter 14: Human Health, ES Volume 1 [APP-066]** also concludes that beneficial effects are anticipated on PRoW during the operation of the Scheme, with the introduction of two new Permissive Paths.
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	**Chapter 12: Socio-economics and Land Use, ES Volume 1 [APP-064]** provides an assessment of the potential socio-economic impacts of the Scheme Where practicable, socio-economic impacts have been appraised against relevant national standards, such as those issued by Department for Energy Security and Net Zero 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.
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.	**Chapter 12: Socio-Economics and Land Use, ES Volume 1 [APP-064]** 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. The benefits of the Scheme, including socio-economic benefits, are also set out in Section 5 of this **Planning Statement [APP-233].**
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.	During the construction phase, a **Framework Skills, Supply Chain and Employment Plan APP-247]** 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.
Traffic and Transport		
Paragraph 5.14.5	If a project is likely to have significant transport implications, the applicant's ES (see Section 4.3) should include a transport appraisal. The DfT's Transport Analysis Guidance (TAG) and Welsh Governments WelTAG provides guidance on modelling and assessing the impacts of transport schemes	**Appendix 13-4, ES Volume 2 [APP-112]** contains a Transport Assessment (TA), 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 [APP-065]**.
Paragraph 5.14.6	National Highways and Highways Authorities are statutory consultees on SNIP applications including energy infrastructure where it is expected to affect the strategic road network and / or have an impact on the local road network, and applicants should consult with National Highways and Highways Authorities as appropriate on the assessment and mitigation to inform the application to be submitted.	A **TA (Appendix 13-4, ES Volume 2 [APP-065])** 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 provide details of proposed	

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
	measures to improve access by active, public and shared transport to: • reduce the need for parking associated with the proposal; • contribute to decarbonisation of the transport network; and • Improve user travel options by offering genuine modal choice	A **Framework CTMP, ES Volume 2 [APP-113]** outlines measures that will be included in the detailed 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. **Chapter 13: Transport and Access, ES Volume 1 [APP-065]** 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: 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 5.14.11	Where mitigation is needed, possible demand management measures must be considered. This could include identifying opportunities to: • reduce the need to travel by consolidating trips, • locate development in areas already accessible by active travel and public transport, • provide opportunities for shared mobility, • re-mode by shifting travel to a sustainable mode that is more beneficial to the network, • retime travel outside of the known peak times, • reroute to use parts of the network that are less busy	A **Framework CTMP, ES Volume 2 [APP-113]** 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.
Paragraph 5.14.12	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	As set out in **Chapter 6: Climate Change, ES Volume 1 [APP-058]** and the **Framework CTMP [APP-113]** 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; 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.

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
		Maritime and inland waterways are considered possible modes of transport for the Scheme.
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	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.
Paragraph 5.14.14	The Secretary of State may attach requirements to a consent where there is likely to be substantial HGV traffic that: • control numbers of HGV movements to and from the site in a specified period during its 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	**Section 13.6** of **Chapter 13: Transport and Access, ES Volume 1 [APP-065]** outlines the embedded design mitigation measures, and effects of the Scheme in relation to traffic and transport, including HGV deliveries and staff vehicles. 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. These effects will be temporary, and only occur during the construction of the Scheme. **Chapter 13: Transport and Access, ES Volume 1 [APP-065]** 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 [APP-113].** 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 aim to secure more sustainable patterns of transport development when considering mitigation measures.	The **TA (Appendix 13-4, ES Volume 2 [APP-112])** and **Framework CTMP (Appendix 13-5, ES Volume 2 [APP-113])** submitted outline the 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 [APP-065]** outlines the embedded design mitigation measures, and effects of the Scheme in relation to traffic and transport, including HGV deliveries and staff vehicles. 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. These effects will be temporary, and only occur during the construction of the Scheme. **Chapter 13: Transport and Access, ES Volume 1 [APP-065]** states that there will be no significant effects as a result of the Scheme on transport and access during operation. 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 [APP-113].**
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	
Paragraph 5.14.21	The Secretary of State should only consider refusing development on highways grounds if there would be an unacceptable impact on	

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
	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.	In addition, the Scheme would include the provision of two permissive paths, as outlined in the **Framework PRoW Management Plan [APP-245].**
Resource and Waste Management		
Paragraph 4.12.10	The Secretary of State should work on the assumption that the relevant pollution control regime and other environmental regulatory regimes, including those on land drainage, water abstraction and biodiversity, will be properly applied and enforced by the relevant regulator. The Secretary of State should act to complement but not seek to duplicate them.	Section 16.7 of **Chapter 16, Other Environmental Topics, ES Volume 1 [APP-068]** 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 [APP-238]** and **Framework DEMP [APP-240]** as well as a **Framework Site Waste Management Plan (SWMP) (Appendix 16-4, ES Volume 2 [APP-124].** 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. 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 [APP-238].** Therefore, effects are not expected to be significant.
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 residual waste.	
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	
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	
Paragraph 5.15.10	The applicant is encouraged to refer to the 'Waste Prevention Programme for England', 'Maiximising Resources Minimising Waste'and 'Towards Zero Waste: Our Waste Strategy for Wales' and should seek to minimise the volume of waste produced and the volume of waste sent for disposal unless it can be demonstrated that this is the best overall environmental outcome.	
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	

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
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 [APP-068]**. Should an environmental permitting (EP) regime 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 [APP-020]** sets out information on the additional consents and licences that are or may be required to construct and operate the Scheme.
Paragraph 5.15.15	The Secretary of State should be satisfied that: • any such waste will be properly managed, both on-site and off-site. • the waste from the proposed facility can be dealt with appropriately by the waste infrastructure which is, or is likely to be, available. Such waste arisings should not have an adverse effect on the capacity of existing waste management facilities to deal with other waste arisings in the area. • adequate steps have been taken to minimise the volume of waste arisings, and of the volume of waste arisings sent to disposal, except where that is the best overall environmental outcome	During the construction, operation and decommissioning of the Scheme, the re-use or recycling of materials will be explored before resorting to landfill options. As detailed in **Section 16.7** of **Chapter 16, Other Environmental Topics** of the **ES [APP-068]** a **Framework SWMP (Appendix 16-4, ES Volume 2 [APP-124])** 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, which will be substantially in accordance with the **Framework SWMP [APP-134].** The detailed SWMP will be finalised with specific measures to be implemented prior to the start of construction. The detailed 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 5.15.16	Where necessary, the Secretary of State should use requirements or obligations to ensure that appropriate measures for waste management are applied.	
Paragraph 5.15.17	The Secretary of State may wish to include a condition on revision of waste management plans at reasonable intervals when giving consent.	
Paragraph 5.15.19	The Secretary of State should have regard to any potential impacts on the achievement of resource efficiency and waste reduction targets set under the Environment Act 2021 or wider goals set out in the government's Environmental Improvement Plan 2023.	
Water Quality and Resources		
Paragraph 5.16.3	Where the project is likely to have effects on the water environment, the applicant should undertake an assessment of the existing status of, and impacts of the proposed project on, water quality, water	**Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 [APP-061]** 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 impacts may change as a result of climate change.

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
	resources and physical characteristics of the water environment, and how this might change due to the impact of climate change on rainfall patterns and consequently water availability across the water environment, as part of the ES or equivalent (see Section 4.3 and 4.10)	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. The submitted **Framework Surface Water Drainage Strategy Appendix 9-4, ES Volume 2 [APP-098],** sets out how surface water and drainage will be managed as part of the Scheme.
Paragraph 5.16.4	The applicant should make early contact with the relevant regulators, including the local authority, the Environment Agency and Marine Management Organisation, where appropriate, for relevant licensing and environmental permitting requirements.	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 [APP-061]**.
Paragraph 5.16.5	Where possible, applicants are encouraged to manage surface water during construction by treating surface water runoff from exposed topsoil prior to discharging and to limit the discharge of suspended solids e.g. from car parks or other areas of hard standing, during operation	The submitted **Framework Surface Water Drainage Strategy Appendix 9-4, ES Volume 2 [APP-098],** sets out how surface water and drainage will be managed as part of the Scheme. 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 [APP-238].** This will inform a CEMP, which will be produced and secured through the DCO.
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	
Paragraph 5.16.7	The ES should in particular describe: • the existing quality of waters affected by the proposed project and the impacts of the proposed project on water quality, noting any relevant existing discharges, proposed new discharges and proposed changes to discharges • existing water resources affected by the proposed project and the impacts of the proposed project on water resources, noting any relevant existing abstraction rates, proposed new abstraction rates and proposed changes to abstraction rates (including any impact on or use of mains supplies and reference to Abstraction Licensing Strategies) and also demonstrate how proposals minimise the use of water resources and water consumption in the first instance • existing physical characteristics of the water environment (including quantity and dynamics of flow) affected by the proposed project and any impact of physical modifications to these characteristics • any impacts of the proposed project on water bodies or protected areas (including shellfish protected areas) under the Water Environment (Water Framework Directive) (England and Wales)	**Section 9.5** of **Chapter 9: Flood Risk, Drainage and water Environment, ES Volume 1 [APP-061]** provides an assessment of the baseline that complies with this policy. Chapter 9 also considers the impacts of climate change and cumulative effects. **Appendix 9-2** of **ES Volume 2 [APP-095]** includes a Water Framework Directive (WFD) Assessment, which assesses impacts on water bodies or protected areas under the WFD and SPZs.

NPS EN-1 Relevant Paragraph	NPS EN-1 Detail	NPS EN-1 Scheme compliance
	Regulations 2017 and source protection zones (SPZs) around potable groundwater abstractions • how climate change could impact any of the above in the future • any cumulative effects	
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 [APP-238]** which will inform a detailed CEMP, which will be secured by the DCO. **Chapter 9: Flood Risk, Drainage and Water Environment, ES Volume 1 [APP-061]** sets out measures that are proposed to mitigate adverse effects on the water environment.
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.	

National Policy Statement for Renewable Energy EN-3, November 2023

Table 2 National Policy Statement for Renewable Energy EN-3, November 2023

NPS EN-3 Relevant Paragraph	NPS EN-3 Detail	NPS EN-3 Scheme compliance
Climate Change Adaption		
Paragraph 2.4.11	Solar photovoltaic (PV) sites may also be proposed in low lying exposed sites. For these proposals, applicants should consider, in particular, how plant will be resilient to: • increased risk of flooding; and • impact of higher temperatures.	As outlined in **Chapter 6: Climate Change of the ES [APP-058]**, 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: 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 [APP-113])** 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 [APP-233],** 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 [APP-238].** 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 [APP-061].** 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 [APP-238], Framework OEMP [APP-239] and Framework DEMP [APP-240]** 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.

NPS EN-3 Relevant Paragraph	NPS EN-3 Detail	NPS EN-3 Scheme compliance
Good Design		
Paragraph 2.5.2	Proposals for renewable energy infrastructure should demonstrate good design, particularly in respect of landscape and visual amenity, opportunities for co-existence/co-location with other marine and terrestrial uses, and in the design of the project to mitigate impacts such as noise and effects on ecology and heritage.	As detailed in the **Design and Access Statement [APP-234]** and Section 6.3 of the **Planning Statement [APP-233],** 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, Volume 1 of the ES [APP-055]**and the **Design and Access Statement [APP-234]**
Flexibility		
Paragraph 2.6.1	Where details are still to be finalised applicants should explain in the application which elements of the proposal have yet to be finalised, and the reason why this is the case	The applicant wishes to retain flexibility regarding the design detail of certain components of the Scheme. The extent of flexibility required is described in **Chapter 2: The Scheme, ES Volume 1 [APP-054]** and set out in the **Outline Design Principles Statement [APP-235]** and **Design and Access Statement [APP-234].**
Paragraph 2.6.2	Where flexibility is sought in the consent as a result, applicants should, to the best of their knowledge, assess the likely worst-case environmental, social and economic effects of the proposed development to ensure that the impacts of the project as it may be constructed have been properly assessed	As set out in **Chapter 2: The Scheme, ES Volume 1 [APP-054]** 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.
Need/Principle		
Paragraph 2.10.9	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.	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 [APP-232]** 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.
Paragraph 2.10.10	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.	
Paragraph 2.10.11	The Powering Up Britain: Energy Security Plan states that government seeks large scale ground-mount solar deployment across the UK, looking for development mainly on brownfield, industrial and low and medium grade agricultural land. It sets out that solar and farming can be complementary, supporting each other financially, environmentally and through shared use of land and encourages deployment of solar technology that delivers environmental benefits, with consideration for ongoing food production or environmental improvement.	

NPS EN-3 Relevant Paragraph	NPS EN-3 Detail	NPS EN-3 Scheme compliance
Paragraph 2.10.13	Solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation.	NPS EN-3 explicitly recognises that solar projects can be deployed quickly so can meet the urgent need for renewable energy projects identified in NPS EN-1, NPS EN-1 and other national policies and strategies. It also recognises that solar projects generate electricity affordably. As set out in the **Statement of Need [APP-232]** 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.
Paragraph 2.10.14	Solar farms can be built quickly and, coupled with consistent reductions in the cost of materials and improvements in the efficiency of panels, large-scale solar is now viable in some cases to deploy subsidy-free.	
Paragraph 2.10.15	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. Schedule 1 of the **draft DCO [AS-008]** 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 [APP-054].** The installed capacity of the solar PV panels is the total DC power of all the panels at full power. The capacity for the Scheme considered in the climate change assessment **[APP-058]** is 480 megawatts (MW) (total DC power) whereas the 400MW is the grid connection and is measured in AC power and is the total AC power of all the central Inverters combined. As discussed in section 6 of the Statement of Need **[APP-232]** overplanting is used to maximise the available grid connection capacity across the lifetime of the Scheme owing to the degradation effects (light induced and other weather impacts) on solar panels as they age. As part of the detailed design process the design and layout of the Solar PV Site will be a reflection of the available technology (and overplanting ratio chosen) arranged in accordance with the parameters assessed in the Environmental Impact Assessment and parameters secured through the Outline Design Principles Statement **[APP-235]**. The design uses single axis trackers (SAT) that have a north to south orientation and track the sunlight from east to west on a daily basis, this gives a design that uses straight lines which also allows the minimisation of the visual impact on a large scale. The proposed layout of the Solar PV Tables avoids shading and ensures the sunlight available in both summer and winter is maximised for electricity generation. This will allow the Scheme to consistently produce electricity to export to the National Electricity Transmission System (NETS) thereby aiming to deliver the 400MW AC output for as many hours as possible. The Applicant has based the design on a tracked mounting system and panel technology which have a record of delivering longevity and efficiency based on the Applicant's experience of using these systems in Australia. As discussed in ES Chapter 3: Alternatives and Design Evolution, the Applicant's selection of the Solar PV Site has considered irradiance and topography by initially identifying East Yorkshire and areas of the neighbouring North Yorkshire as a suitable area within the UK to locate a large-scale solar development due to its good levels of irradiation (see Figure 6-2 in the Statement of Need [APP-232]) and large areas of flat open land. As shown in ES Figures 10-9 to 10-55 **[APP-164 to APP-210]** the Solar PV Site is located on low lying land within a relatively flat landscape and is therefore optimal for a large-scale development of SAT. With regard to the reference to acreage per MW in NPS EN-3 paragraph 2.10.17, the Applicant notes that this paragraph does not set out any detailed technological assumptions or method for how this has been derived. Taking the total acreage of the Solar PV Areas within the Solar PV Site and excluding the buffer zones within these
Paragraph 2.10.16	Associated infrastructure may also be proposed and may be treated, on a case by case basis as associated development, such as energy storage, electrolysers associated with the production of low carbon hydrogen, or security arrangements (which may encompass flood defences, fencing, lighting and surveillance).	
Paragraph 2.10.17	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.	
Paragraph 2.10.18	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.	

NPS EN-3 Relevant Paragraph	NPS EN-3 Detail	NPS EN-3 Scheme compliance
		areas for fencing, public rights of ways, access, overhead lines and landscape and ecological mitigation and enhancement zones of 1836 acres and the total DC power of 480MW, this equates to approximately 3.83 acres per MW power output, which is within the range presented in paragraph 2.10.17 of NPS EN-3.
Irradiance and site Topography		
Paragraph 2.10.19	Irradiance will be a key consideration for the applicant in identifying a potential site as the amount of electricity generated on site is directly affected by irradiance levels. Irradiance of a site will in turn be affected by surrounding topography, with an uncovered or exposed site of good elevation and favourable south-facing aspect more likely to increase year-round irradiance levels. This in turn affects the carbon emission savings and the commercial viability of the site.	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). The Order limits have been located within an area of relatively low lying and flat landscape to maximise generation of energy and irradiance. The Scheme has adopted tracking panels that tilt to maximise energy generation within the Scheme.
Paragraph 2.10.20	In order to maximise irradiance, applicants may choose a site and design its layout with variable and diverse panel types and aspects, and panel arrays may also follow the movement of the sun in order to further maximise the solar resource.	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 [AS-008]** and the **Outline Design Principles Statement [APP-235].** They will enable the optimum production of renewable energy within the Scheme.
Network Connection		
Paragraph 2.10.21	Applicants should consider important issues relating to network connection at Section 4.11 of EN-1 and in EN-5. In particular, and where appropriate, applicants should proceed in a manner consistent with the regulatory regime for offshore transmission networks established by Ofgem, details of which are set out in EN-5.	Proximity to an available grid connection with appropriate capacity is fundamental to the viability and deliverability of large-scale solar development. The Applicant was aware of the legacy of coal fired power stations in the East Yorkshire and North Yorkshire areas and undertook a search of available capacity within these areas. Following discussions with National Grid, the Applicant secured a point of connection to the national electricity transmission system at the existing National Grid Drax Substation, in Drax, North Yorkshire.
Paragraph 2.10.22	Many solar farms are connected into the local distribution network. The capacity of the local grid network to accept the likely output from a proposed solar farm is critical to the technical and commercial feasibility of a development proposal.	**Chapter 3: Alternatives and Design Evolution** of the **ES [APP-055]** and the **Grid Connection Statement [APP-236]** provides further discussion on the process of securing the agreed network connection. The cumulative impact of the Scheme and developments within the surrounding area is included in **Chapter 17: Cumulative Effects and Interactions** of the **ES [APP-070]**.
Paragraph 2.10.25	To maximise existing grid infrastructure, minimise disruption to existing local community infrastructure or biodiversity and reduce overall costs applicants may choose a site based on nearby available grid export capacity.	
Paragraph 2.10.26	Where this is the case, applicants should consider the cumulative impacts of situating a solar farm in proximity to other energy generating stations and infrastructure.	
Proximity to Dwellings		
Paragraph 2.10.27	Utility-scale solar farms are large sites that may have a significant zone of visual influence. The two main impact issues that determine distances to sensitive receptors are therefore likely to be visual amenity and glint and glare. These are considered in Landscape, Visual and Residential Amenity (paragraphs 2.10.84- 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 [AS-014]** 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 [APP-162]**.

NPS EN-3 Relevant Paragraph	NPS EN-3 Detail	NPS EN-3 Scheme compliance
		The design mitigation which is outlined in section 10.6 of **Chapter 10: Landscape and Visual Amenity, ES Volume 1 [APP-062]**; the **Framework LEMP [APP-233]** and the **Design and Access Statement [APP-234]** 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. **Chapter 16: Other Environmental Topics, ES Volume 1 [APP-068]** 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. 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 [APP-233]**, 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.
Agriculture and Land Classification		
Paragraph 2.10.28	Solar is a highly flexible technology and as such can be deployed on a wide variety of land types.	The Applicant has set out its rationale for selecting the Solar PV Site in **Chapter 3: Alternatives and Design Evolution, ES Volume 1 [APP-055].** This explains the stages and the main considerations which have influenced the Applicant in how it has selected the land for the Scheme. For the Solar PV Site this has included seeking to avoid environmental and land use constraints such as landscape, ecology, green belt and heritage designations, as well as areas at highest risk of fluvial flooding, and taking into consideration other criteria such as irradiance, topography; field pattern and arrangement; land use conflict, as well as land availability. The Applicant considered the use of previously developed land and did not identify any available land within its initial area of search or within the refined area of search of an appropriate size to locate 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 [APP-055].** The Applicant has taken a sequential approach to the use of agricultural land considering whether land of lower grade is available and suitable. Following the identification of an area of search derived from the point of connection at the National Grid Drax Substation the Applicant did not identify any alternative sites 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. The Scheme is located mostly on lower quality agricultural land, with the majority of land (88.2%) 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.
Paragraph 2.10.29	While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land (avoiding the use of "Best and Most Versatile" agricultural land where possible). 'Best and Most Versatile agricultural land is defined as land in grades 1, 2 and 3a of the Agricultural Land Classification.	

NPS EN-3 Relevant Paragraph	NPS EN-3 Detail	NPS EN-3 Scheme compliance
		An assessment of the Scheme's impact on land use is contained within **Chapter 12: Socio-Economics and Land Use, ES Volume 1 [APP-064].** An assessment of the Schemes impact on soils and agricultural Land is contained within **Chapter 15: Soils and Agricultural Land, ES Volume 1 [APP-067].**
Paragraph 2.10.30	Whilst the development of ground mounted solar arrays is not prohibited on Best and Most Versatile 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.	An assessment of the Schemes impact on soils and agricultural Land is contained within **Chapter 15: Soils and Agricultural Land, ES Volume 1 [APP-067].** The Applicant has set out its rationale for selecting the Solar PV Site in **Chapter 3: Alternatives and Design Evolution, ES Volume 1 [APP-055].** This explains the stages and the main considerations which have influenced the Applicant in how it has selected the land for the Scheme. For the Solar PV Site this has included seeking to avoid environmental and land use constraints such as landscape, ecology, green belt and heritage designations, as well as areas at highest risk of fluvial flooding, and taking into consideration other criteria such as irradiance, topography; field pattern and arrangement; land use conflict, as well as land availability. The Applicant considered the use of previously developed land and did not identify any available land within its initial area of search or within the refined area of search of an appropriate size to locate 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 [APP-055].** The Applicant has taken a sequential approach to the use of agricultural land considering whether land of lower grade is available and suitable. Following the identification of an area of search derived from the point of connection at the National Grid Drax Substation the Applicant did not identify any alternative sites 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. The Scheme is located mostly on lower quality agricultural land, with the majority of land (88.2%) 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 [APP-067]** 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 [APP-058-APP-068]** and is summarised in **Chapter 17: Cumulative Effects and Interactions, ES Volume 1 [APP-069].** 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 2.10.31	It is recognised that at this scale, it is likely that applicants' developments will use some agricultural land. Applicants should explain their choice of site, noting the preference for development to be on suitable brownfield, industrial and low and medium grade agricultural land.	
Paragraph 2.10.32	Where sited on agricultural land, consideration may be given as to whether the proposal allows for continued agricultural use and/or can be co-located with other functions (for example, onshore wind generation, storage, hydrogen electrolysers) to maximise the efficiency of land use.	

NPS EN-3 Relevant Paragraph	NPS EN-3 Detail	NPS EN-3 Scheme compliance
Paragraph 2.10.33	The Agricultural Land Classification (ALC) is the only approved system for grading agricultural quality in England and Wales and, if necessary, field surveys should be used to establish the ALC grades in accordance with the current, or any successor to it, grading criteria and identify the soil types to inform soil management at the construction, operation, and decommissioning phases in line with the Defra Construction Code.	Baseline information on soils and agricultural land has been derived from published ALC 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 [APP-067].** **A Framework Soil Management Plan [APP-241]** has been produced, which sets out the principles of how the soils will be managed and protected during the construction, operation and decommissioning of the Scheme. A detailed soil management plan will be prepared prior to construction and will be secured by a requirement in Schedule 2 of the DCO. An updated Framework Soil Management Plan has been submitted at Deadline 1 of the Examination.
Paragraph 2.10.34	Applicants are encouraged to develop and implement a Soil Resources and Management Plan which could help to use and manage soils sustainably and minimise adverse impacts on soil health and potential land contamination. This should be in line with the ambition set out in the Environmental Improvement Plan to bring at least 40% of England's agricultural soils into sustainable management by 2028 and increase this up to 60% by 2030.	
Paragraph 2.10.145	[Factors influencing site selection and design] 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.	**Chapter 3: Alternatives and Design Evolution, ES Volume 1 [APP-055]** sets out how agricultural land was considered in the design of the Scheme. **Chapter 15: Soils and Agricultural Land, ES Volume 1 [APP-067]** and the **Framework Soils Management Plan [APP-241]** sets out 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.
Accessibility		
Paragraph 2.10.35	Applicants will need to consider the suitability of the access routes to the proposed site for both the construction and operation of the solar farm with the former likely to raise more issues.	**Chapter 13: Transport and Access, ES Volume 1 [APP-065]** 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 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. Approximately 9.8 ha of land within the Site is illustrated on **Figure 1-3 ES Volume 3 [APP-135]** 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 [APP-054].** An assessment of the Scheme's effect on access is set out in **Chapter 13: Transport and Access, ES Volume 1 [APP-065].** 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 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 2.10.36	Given that potential solar farm sites are largely in rural areas, access for the delivery of solar arrays and associated infrastructure during construction can be a significant consideration for solar farm siting	
Paragraph 2.10.37	Developers will usually need to construct on-site access routes for operation and maintenance activities, such as footpaths, earthworks, or landscaping.	
Paragraph 2.10.38	In addition, sometimes access routes will need to be constructed to connect solar farms to the public road network.	
Paragraph 2.10.39	Applications should include the full extent of the access routes necessary for operation and maintenance and an assessment of their effects.	

NPS EN-3 Relevant Paragraph	NPS EN-3 Detail	NPS EN-3 Scheme compliance
		These effects will be temporary, and only occur during the construction of the Scheme. **Chapter 13: Transport and Access, ES Volume 1 [APP-065]** 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 [APP-113]** 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 2.10.40	Proposed developments may affect the provision of public rights of way networks.	As detailed in the Design and Access Statement [APP-234] one of the Scheme's design objectives is to enhance, where practicable, the existing network of Public Rights of Way (PRoW) to improve accessibility (objective 7) and another objective is to respond sensitively to its proximity to PRoW with regard to visual impact, noise and lighting (objective 4). The selection of the Solar PV Site 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. A **Framework Public Right of Way Management Plan [APP-233]** has been submitted alongside the application. This sets out that access to all existing PRoW will be retained during construction, with no PRoW closures proposed and a limited number of temporary PRoW diversions necessitated by the Scheme.; It provides details of how existing PRoW are expected to be managed during construction and details the proposed mitigation and management measures. The **Framework Public Right of Way Management Plan [APP-233]** 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 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.
Paragraph 2.10.41	Public rights of way may need to be temporarily closed or diverted to enable construction, however, applicants should keep, as far as is practicable and safe, all public rights of way that cross the proposed development site open during construction and protect users where a public right of way borders or crosses the site.	
Paragraph 2.10.42	Applicants are encouraged to design the layout and appearance of the site to ensure continued recreational use of public rights of way, where possible during construction, and in particular during operation of the site.	
Paragraph 2.10.43	Applicants are encouraged where possible to minimise the visual impacts of the development for those using existing public rights of way, considering the impacts this may have on any other visual amenities in the surrounding landscape.	
Paragraph 2.10.44	Applicants should consider and maximise opportunities to facilitate enhancements to the public rights of way and the inclusion, through site layout and design of access, of new opportunities for the public to access and cross proposed solar development sites (whether via the adoption of new public rights of way or the creation of permissive paths), taking into account where appropriate the views of landowners.	

NPS EN-3 Relevant Paragraph	NPS EN-3 Detail	NPS EN-3 Scheme compliance
Paragraph 2.10.45	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 [APP-233]** has been submitted alongside the application which sets out details on how PRoW would be managed to ensure they are safe to use. A detailed Public Right of Way Management Plan will be prepared post consent in agreement with the local planning authority and will be secured by a requirement in Schedule 2 of the DCO.
Security and Lighting		
Paragraph 2.10.46	Security of the site is a key consideration for developers. Applicants may wish to consider not only the availability of natural defences such as steep gradients, hedging and rivers but also perimeter security measures such as fencing, electronic security, CCTV and lighting, with the measures proposed on a site-specific basis.	The Scheme incorporates fencing and security design measures which will mitigate against the risk of criminal activity. This includes internal facing closed circuit television (CCTV) systems which use infra-red technology avoiding the need for lighting. These will be installed around the perimeter of the operational areas of the Solar PV Site. These measures are described in Chapter 2: The Scheme of the Environmental Statement **[APP-054]**. Efforts have been made to reduce the impact of security fencing and lighting. The Scheme is not proposing any visible lighting from CCTV or artificial lighting for security purposes. These design principles are set out in the Outline Design Principles Statement **[APP-235]**. The detailed design for the Scheme, which will need to be approved post consent prior to construction by East Riding of Yorkshire Council and North Yorkshire Council (the relevant local authorities), must be in accordance with the design principles set out in the Outline Design Principles Statement **[APP-235]** and this is secured by a requirement in Schedule 2 to the Draft DCO **[AS-008]**.
Paragraph 2.10.47	Applicants should assess the visual impact of these security measures, as well as the impacts on local residents, including for example issues relating to intrusion from CCTV and light pollution in the vicinity of the site.	
Paragraph 2.10.48	Applicants should consider the need to minimise the impact on the landscape and the visual impact of security measures	
Technical considerations		
Paragraph 2.10.49	Applications for solar farms are likely to comprise a number of elements including solar panel arrays, piling, inverters, mounting structures, cabling, earthworks, and measures associated with site security, and may also include associated infrastructure such as energy storage and electrolysers associated with the production of low carbon hydrogen.	The **Outline Design Principles Statement [APP-235]** provides the guiding principles for the detailed design of the Scheme and will be secured by a requirement in the DCO. This will form the parameters of the detailed design and has fed into Schedule 1 of the **draft DCO [AS-008]** where the different components of the Scheme are divided into works which correspond with the work number areas shown on the **Works Plans [APP-008]**.
Paragraph 2.10.50	Solar panels generate electricity in direct current (DC) form. A number of panels feed an external inverter, which is used to convert the electricity to alternating current (AC). After inversion a transformer will step-up the voltage for export to the grid. Because the inverter is separate from the panels, the total capacity of a solar farm can be measured either in terms of the combined capacity of installed solar panels (measured in DC) or in terms of combined capacity of installed inverters (measured in AC).	The installed capacity of the solar PV panels is the total DC power of all the panels at full power. The capacity for the Scheme considered in the climate change assessment **[APP-058]** is 480 megawatts (MW) (total DC power) whereas the 400MW is the grid connection and is measured in AC power and is the total AC power of all the central Inverters combined. As discussed in section 6 of the Statement of Need **[APP-232]** overplanting is used to maximise the available grid connection capacity across the lifetime of the Scheme owing to the degradation effects (light induced and other weather impacts) on solar panels as they age. As part of the detailed design process the design of the Solar PV Site will be a reflection of the available technology (and overplanting ratio chosen) arranged in accordance with the parameters assessed in the Environmental Impact Assessment and parameters secured through the Outline Design Principles Statement **[APP-235]**.
Paragraph 2.10.51	For the purposes of determining the capacity thresholds in Section 15 of the 2008 Act, all forms of generation other than solar are currently assessed on an AC basis, while a practice has developed where solar farms are assessed on their DC capacity	
Paragraph 2.10.52	Having reviewed this matter, the Secretary of State is now content that this disparity should end, particularly as electricity from some other forms of generation is switched between DC and AC within a generator before it is measured.	

NPS EN-3 Relevant Paragraph	NPS EN-3 Detail	NPS EN-3 Scheme compliance
Paragraph 2.10.53	From the date of designation of this NPS, for the purposes of Section 15 of the Planning Act 2008, the maximum combined capacity of the installed inverters (measured in alternating current (AC)) should be used for the purposes of determining solar site capacity.	
Paragraph 2.10.55	The installed generating capacity of a solar farm will decline over time in correlation with the reduction in panel array efficiency. There is a range of sources of degradation that developers need to consider when deciding on a solar panel technology to be used. Applicants may account for this by overplanting solar panel arrays.	
Paragraph 2.10.56	AC installed export capacity should not be seen as an appropriate tool to constrain the impacts of a solar farm. Applicants should use other measurements, such as panel size, total area and percentage of ground cover to set the maximum extent of development when determining the planning impacts of an application.	**Chapter 3: Design Evolution and Alternatives, ES Volume 1 [APP-055]** sets out the evolution of design, and the technology proposed by the Scheme.
Site layout design and appearance		
Paragraph 2.10.60	As set out above applicants will consider several factors when considering the design and layout of sites, including, proximity to available grid capacity to accommodate the scale of generation, orientation, topography, previous land – use and ability to mitigate environmental impacts and flood risk.	As detailed in the **Design and Access Statement [APP-234]** and Section 6.3 of the **Planning Statement [APP-233],** 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 [APP-234]** 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.
Paragraph 2.10.61	For a solar farm to generate electricity efficiently the panel array spacing should seek to maximise the potential power output of the site. The type, spacing and aspect of panel arrays will depend on the physical characteristics of the site such as site elevation.	
Paragraph 2.10.62	In terms of design and layout, applicants may favour a south-facing arrangement of panels to maximise output although other orientations may be chosen. For example, an east-west layout, whilst likely to result in reduced output compared to south-facing panels on a panel-by-panel basis, may allow for a greater density of panels to compensate and therefore for generation to be spread more evenly throughout the day.	Objective 1 in the **Design and Access Statement [APP-234]** seeks to ensure that the Scheme efficiently generates a large amount of electricity which would contribute to decarbonisation of energy generation and net zero. To achieve this the Scheme has adopted east-west single axis 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 [APP-235].** They will enable the optimum production of renewable energy within the Scheme.
Paragraph 2.10.63	It is likely that underground and overhead cabling will be required to connect the electrical assets of the site, such as from the substation to the panel arrays or storage facilities.	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 [APP-236].**
Paragraph 2.10.64	In the case of underground cabling, applicants are expected to provide a method statement describing cable trench design, installation methodology, as well as details of the operation and maintenance regime.	**The Framework CEMP [APP-238]** provides details of provisional cable trench design, installation methodology, as well as details of the operation and maintenance regime. A detailed CEMP, which will be substantially in accordance with the **Framework CEMP [APP-238]** will be produced post consent and will need to be approved by the local planning authority, as secured by a requirement in Schedule 2 of the DCO.

NPS EN-3 Relevant Paragraph	NPS EN-3 Detail	NPS EN-3 Scheme compliance
Project Lifetime and decommissioning		
Paragraph 2.10.66	Time limited consent, where granted, is described as temporary because there is a finite period for which it exists, after which the project would cease to have consent and therefore must seek to extend the period of consent or be decommissioned and removed.	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). 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 [APP-055].** 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. 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 relevant, the technical assessments presented in **Chapters 6 to 6 of this ES** [**APP-058-APP-068]** have considered a worst case in respect to that discipline. A **Framework DEMP [APP-240]** 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.
Paragraph 2.10.69	Applicants should set out what would be decommissioned and removed from the site at the end of the operational life of the generating station, considering instances where it may be less harmful for the ecology of the site to keep or retain certain types of infrastructure, for example underground cabling, and where there may be socio-economic benefits in retaining site infrastructure after the operational life, such as retaining pathways through the site or a site substation	
Paragraph 2.10.147	Where the consent for a solar farm is to be time-limited, the DCO should impose a requirement setting that time-limit from the date the solar farm starts to generate electricity.	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) as required by Requirement 18 of the draft DCO [AS-008] The Scheme will be decommissioned at the end of its operational life in accordance with a **Framework DEMP [APP-240].** 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 [APP-055]** describes how the Order limits would be left on completion of decommissioning.
Paragraph 2.10.148	Such a requirement should also secure the decommissioning of the generating station after the expiration of its permitted operation to ensure that inoperative plant is removed after its operational life	
Paragraph 2.10.149	An upper limit of 40 years is typical, although applicants may seek consent without a time period or for differing time-periods for operation	
Paragraph 2.10.150	The time limited nature of the solar farm, where a time limit is sought as a condition of consent, is likely to be an important consideration for the Secretary of State.	
Paragraph 2.10.151	The Secretary of State should consider the period of time the applicant is seeking to operate the generating station as well as the extent to which the site will return to its original state when assessing impacts such as landscape and visual effects and potential effects on the settings of heritage assets and nationally designated landscapes	
Flexibility		
Paragraph 2.10.70	In many cases, not all aspects of the proposal may have been settled in precise detail at the point of application. Such aspects may include: • the type, number and dimensions of the panels;	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 [APP-055]** and set out in the **Design Principles Statement [APP-235]** and **Design and Access Statement [APP-234].**

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	• 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).	**Chapter 5: Environmental Impact Assessment Methodology [APP-057]** and **Chapter 2: the Scheme, ES Volume 1 [APP-055]** explain that the parameters for the Scheme are defined by the **Design Principles Statement [APP-235]** which have been informed by the assessments in the ES and reciprocally used for assessment purposes. Where there is uncertainty, the Applicant has assessed the worst case scenario for the purposes of the ES.
Paragraph 2.10.71	Applicants should set out a range of options based on different panel numbers, types and layout, with and without storage.	
Paragraph 2.10.74	Guidance on how applicants should manage flexibility is set out at Section 2.6 of this NPS.	
Biodiversity and Ecological Conservation		
Paragraph 2.10.76	The applicant's ecological assessments should identify any ecological risk from developing on the proposed site.	**Chapter 8: Ecology, ES Volume 1 [APP-060]** 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 news, water voles and badgers. This has been informed by a desk study and field surveys. As set out in the **Design and Access Statement [APP-234]**, 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 delivering the design champion role encouraged by 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.
Paragraph 2.10.77	Issues that need assessment may include habitats, ground nesting birds, wintering and migratory birds, bats, dormice, reptiles, great crested newts, water voles and badgers	
Paragraph 2.10.78	The applicant should use an advising ecologist during the design process to ensure that adverse impacts are avoided, minimised or mitigated in line with the mitigation hierarchy, and biodiversity enhancements are maximised	
Paragraph 2.10.79	The assessment may be informed by a 'desk study' of existing ecological records, an evaluation of the likely impacts of the solar farm upon ecological features and should specify mitigation to avoid or minimise these impacts, and any further surveys required	Section 8.7 of **Chapter 8: Ecology, ES Volume 1 [APP-060]** 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: Ecology, ES Volume 1 [APP-060]** no residual significant adverse effects have been identified on any internationally, nationally or locally designated sites or features, as well as protected species during construction, operation or decommissioning of the Scheme.
Paragraph 2.10.80	Applicants should consider earthworks associated with construction compounds, access roads and cable trenching.	Section 2.6 of **Chapter 2: The Scheme, ES Volume 1 [APP-060]** describes the works required for construction, including cable installation which will include earthworks.
Paragraph 2.10.81	Where soil stripping occurs topsoil and subsoil should be stripped, stored, and replaced separately to minimise soil damage and to provide optimal conditions for site restoration. Further details on minimising impacts on soil and soil handling are above at 2.10.18 and 2.10.19.	**A Framework Soils and Management Plan [APP-241]** 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. This sets out that soils will be stripped, stored, and replaced separately to minimise soil damage, and provide optimal conditions for site restoration.
Paragraph 2.10.82	Applicants should consider how security and lighting installations may impact on the local ecology. Where pole mounted CCTV facilities are proposed the location of these facilities should be carefully considered to minimise impact. If lighting is necessary, it should be minimised and directed away from areas of likely habitat	Security, lighting and CCTV required for the Scheme are described in detail in **Chapter 2: The Scheme, ES Volume 1 [APP-054], CEMP [APP-238], Framework OEMP [APP-239] and Framework DEMP [APP-240].** 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

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		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 2.10.83	Applicants should consider how site boundaries are managed. If any hedges/scrub are to be removed, further surveys may be necessary to account for impacts. Buffer strips between perimeter fencing and hedges may be proposed, and the construction and design of any fencing should account for enabling mammal, reptile and other fauna access into the site if required to do so in the ecological report	The **Framework LEMP [APP-246]** provides details on how site boundaries will be managed. 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 the **Framework LEMP]APP-246].**
Paragraph 2.10.89	Solar farms have the potential to increase the biodiversity value of a site, especially if the land was previously intensively managed. In some instances, this can result in significant benefits and enhancements beyond Biodiversity Net Gain, which result in wider environmental gains which is encouraged.	The Biodiversity Net Gain (BNG) report using Natural England's Biodiversity Metric 4.0 has been updated for Deadline 1 of the Examination. This report demonstrates that the Scheme will deliver 80.42% BNG for area-based units, 10.30% BNG for hedgerow units and 10.09% BNG for watercourse units. Therefore, the Scheme delivers significant biodiversity net gain on the site, with at least 10% BNG across the whole Site.
Paragraph 2.10.90	For projects in England, applicants should consider enhancement, management, and monitoring of biodiversity in line with the ambition set out in the Environmental Improvement Plan and any relevant measures and targets, including statutory targets set under the Environment Act or elsewhere.	
Paragraph 2.10.128	In England, proposed enhancements should take account of the above factors and as set out in Section 4.6 and 5.5 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	The Biodiversity Net Gain (BNG) report using Natural England's Biodiversity Metric 4.0 has been updated for Deadline 1 of the Examination. This report demonstrates that the Scheme will deliver 80.42% BNG for area-based units, 10.30% BNG for hedgerow units and 10.09% BNG for watercourse units. Therefore, the Scheme delivers significant biodiversity net gain on the site, with at least 10% BNG across the whole Site.
Paragraph 2.10.129	This might include maintaining or extending existing habitats and potentially creating new important habitats, for example by installing cultivated strips/plots for rare arable plants, rough grassland margins, bumble bee plant mixes, and wild bird seed mixes.	The Scheme includes many measures to extend existing habitats and create new important habitats. These are set out in the **Framework LEMP [APP-233].** The Biodiversity Net Gain (BNG) report using Natural England's Biodiversity Metric 4.0 has been updated for Deadline 1 of the Examination. This report demonstrates that the Scheme will deliver 80.42% BNG for area-based units, 10.30% BNG for hedgerow units and 10.09% BNG for watercourse units. Therefore, the Scheme delivers significant biodiversity net gain on the site, with at least 10% BNG across the whole Site.
Paragraph 2.10.130	Applicants are advised to develop an ecological monitoring programme to monitor impacts upon the flora of the site and upon any particular ecological receptors (such as bats and wintering birds). Results of the monitoring will then inform any changes needed to the land management of the site, including, if appropriate, any livestock grazing regime.	Appropriate monitoring will be undertaken during construction and operation as set out in the **Framework LEMP [APP-233]].**
Drainage		
Paragraph 2.10.84	Where a Flood Risk Assessment has been carried out this must be submitted alongside the applicant's ES. This will need to consider the impact of drainage. As solar PV panels	An **FRA** is provided at **Appendix 9-3, ES Volume 2 [APP-097].** 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.

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	will drain to the existing ground, the impact will not, in general, be significant.	A **Framework Surface Water Drainage Strategy** has been prepared (see **Appendix 9-4, ES Volume 2 [APP-098]** 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. Mitigation measures such as the use of localised SuDS, such as swales and infiltration trenches, will be used to control runoff if required. The FRA, and associated **Sequential Test Report Appendix 9-3, ES Volume 2 [APP-097]** set out how the Scheme has undertaken a sequential site selection process, which avoids the need to impact on existing drainage systems and watercourses. There would be no new culverts as part of the Scheme, but existing culverts may be upgraded or slightly extended.
Paragraph 2.10.85	Where access tracks need to be provided, permeable tracks should be used, and localised Sustainable Drainage Systems (SuDS), such as swales and infiltration trenches, should be used to control any runoff where recommended.	
Paragraph 2.10.86	Given the temporary nature of solar PV farms, sites should be configured or selected to avoid the need to impact on existing drainage systems and watercourses.	
Paragraph 2.10.87	Culverting existing watercourses/drainage ditches should be avoided.	
Paragraph 2.10.88	Where culverting for access is unavoidable, applicants should demonstrate that no reasonable alternatives exist and where necessary it will only be in place temporarily for the construction period.	
Paragraph 2.10.92	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	The Applicant does not consider that this information is required for the Scheme's drainage system.
Paragraph 2.10.154	Water management is a critical component of site design for ground mount solar plants. Where previous management of the site has involved intensive agricultural practice, solar sites can deliver significant ecosystem services value in the form of drainage, flood attenuation, natural wetland habitat, and water quality management.	The submitted **Framework Surface Water Drainage Strategy Appendix 9-4, ES Volume 2 [APP-098]**, sets out how water and drainage will be managed as part of the Scheme.
Paragraph 2.10.156	Where developments are proposed on peat, to ensure the development will result in minimal disruption to the ecology, or release of CO2 and that the carbon balance savings of the scheme are maximised, the Secretary of State should be satisfied that the solar farm layout and construction methods have been designed to minimise soil disturbance during construction and maintenance of roads, tracks, and other infrastructure and in England should take into account the policies set out in the England Peat Action Plan 2021.	Chapter 15: Soils and agricultural land [APP- a discrete deposit of deep humified fen peat was recorded on a small area of floodplain land in Area 1e adjoining the River Foulness in the north-east of the survey area. These soils are low-lying and poorly to very poorly draining (Soil Wetness Class IV or V) and coincide with the Grade 4. Additionally, within Area 1e and in Ecology Mitigation Area 1h there are areas of organic clays (peaty loams). Appropriate management of this soil resource will via the Framework Soil Management Plan [APP-241] submitted. The delivery of a detailed SMP prior to the commencement of works on Site and implementation of the measures it describes will be secured through the DCO.
Landscape, Visual and Residential Amenity		
Paragraph 2.10.94	The approach to assessing cumulative landscape and visual impact of large-scale solar farms is likely to be the same as assessing other onshore energy infrastructure. Solar farms are likely to be in low lying areas of good exposure and as such may have a wider zone of visual influence than other types of onshore energy infrastructure.	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 [APP-062]**. 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 2.10.95	However, whilst it may be the case that the development covers a significant surface area, in the case of ground-mounted solar panels it should be noted that with effective	

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	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 [APP-164-APP-191].** This also shows that the Solar PV Site is located on flat land which allows for screening and therefore minimising the visual impact.
Paragraph 2.10.96	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 2.10.97	Applicants should carry out a landscape and visual assessment and report it in the ES. Visualisations may be required to demonstrate the effects of a proposed solar farm on the setting of heritage assets and any nearby residential areas or viewpoints.	The layout of the Scheme has been designed to minimise the loss of, and avoid significant impacts on, existing landscape features, where practicable. Measures are proposed protect and retain vegetation, and provide new vegetation planting. These measures and the management of vegetation is set out in the Framework LEMP [APP-233]
Paragraph 2.10.98	Applicants should follow the criteria for good design set out in Section 4.7 of EN-1 when developing projects and will be expected to direct considerable effort towards minimising the landscape and visual impact of solar PV arrays especially within nationally designated landscapes.	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. Good design has been a key consideration from the outset. The LVIA has informed the iterative design process, which is set out int the **Design and Access Statement [APP-234].** 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 [APP-233].** This will inform a detailed LEMP which will be secured by the DCO. The landscape design principles aim to achieve the following: a. Careful siting in the landscape b. Conserving the existing vegetation pattern c. Creating new green infrastructure d. Sensitive Design in Relation to Form, Colour, and Materials e. 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 [APP-054].**
Paragraph 2.10.99	Whilst there is an acknowledged need to ensure solar PV installations are adequately secured, required security measures such as fencing should consider the need to minimise the impact on the landscape and visual impact (see s 2.10.31 – 2.10.33 above)	
Paragraph 2.10.100	The applicant should consider as part of the design, layout, construction, and future maintenance plans how to protect and retain, wherever possible, the growth of vegetation on site boundaries, as well as the growth of existing hedges, established 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. 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: 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; Measures are proposed protect and retain vegetation, and provide new vegetation planting. These measures and the management of vegetation is set out in the **Framework LEMP [APP-233]**
Paragraph 2.10.101	The impact of the proposed development on established trees and hedges should be informed by a tree survey and arboricultural/hedge assessment as appropriate	

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		An **Arboricultural Impact Assessment Appendix 10-5, ES Volume 2 [APP-102]** sets out the results of tree surveys, which has informed the assessment of impacts on trees and hedges as set out in **Chapter 8: Ecology, ES Volume 1 [APP-060]**
Paragraph 2.10.131	Applicants should consider the potential to mitigate landscape and visual impacts through, for example, screening with native hedges, trees and woodlands.	The Scheme's design aims to filter and screen more prominent views of the Scheme from visual receptors. **Chapter 10: LVIA, ES Volume 1 [APP-062]** 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. 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 [APP-055]**), 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. The proposed fencing has been designed to minimise its visual prominence and is detailed in **Chapter 2: The Scheme, ES Volume 1 [APP-054].** 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.
Paragraph 2.10.132	Applicants should aim to minimise the use and height of security fencing. Where possible applicants should utilise existing features, such as hedges or landscaping, to assist in site security or screen security fencing.	
Paragraph 2.10.133	Applicants should minimise the use of security lighting. Any lighting should utilise a passive infra-red (PIR) technology and should be designed and installed in a manner which minimises impact.	
Paragraph 2.10.157	The Secretary of State will consider the landscape and visual impact of any proposed solar PV farm, taking account of any sensitive visual receptors, and the effect of the development on landscape character, together with the possible cumulative effect with any existing or proposed development. Nationally designated landscapes (National Parks, The Broads and Areas of Outstanding Beauty) are afforded extra protection due their statutory purpose. Development in these areas needs to satisfy policy as set out in EN-1 Section 5.10.	**Chapter 10: Landscape and Visual Amenity, ES Volume 1 [APP-062]** concludes that the Scheme will not result in any significant adverse effects on nationally designated landscapes as none are present within the zone of theoretical visibility for the Scheme. **Chapter 10: Landscape and Visual Amenity, ES Volume 1 [APP-062]** 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. 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 2.10.158	Solar PV panels are 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	**Chapter 16: Other Environmental Topics, ES Volume 1 [APP-068]** 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.

NPS EN-3 Relevant Paragraph	NPS EN-3 Detail	NPS EN-3 Scheme compliance
	stationed between or at an angle of the sun and the receptor.	
Paragraph 2.10.103	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.	
Paragraph 2.10.104	When a quantitative glint and glare assessment is necessary, applicants are expected to consider the geometric possibility of glint and glare affecting nearby receptors and provide an assessment of potential impact and impairment based on the angle and duration of incidence and the intensity of the reflection.	
Paragraph 2.10.105	The extent of reflectivity analysis required to assess potential impacts will depend on the specific project site and design. This may need to account for 'tracking' panels if they are proposed as these may cause differential diurnal and/or seasonal impacts.	
Paragraph 2.10.106	When a glint and glare assessment is undertaken, the potential for solar PV panels, frames and supports to have a combined reflective quality may need to be assessed, although the glint and glare of the frames and supports is likely to be significantly less than the panels	
Paragraph 2.10.133	Applicants should minimise the use of security lighting. Any lighting should utilise a passive infra-red (PIR) technology and should be designed and installed in a manner which minimises impact.	As set out in **Chapter 2: The Scheme, ES Volume 1 [APP-058]**, 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.
Paragraph 2.10.135	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 [APP-068]** 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 2.10.136	Applicants may consider adjusting the azimuth alignment of or changing the elevation tilt angle of a solar panel, within the economically viable range, to alter the angle of incidence. In practice this is unlikely to remove the potential impact altogether but in marginal cases may contribute to a mitigation strategy	
Paragraph 2.10.158	Solar PV panels are designed to absorb, not reflect, irradiation. However, the Secretary of State should assess the potential impact of glint and glare on nearby homes, motorists, public rights of way, and aviation infrastructure (including aircraft departure and arrival flight paths).	
Paragraph 2.10.159	Whilst there is some evidence that glint and glare from solar farms can be experienced by pilots and air traffic controllers in certain conditions, there is no evidence that glint and glare from solar farms results in significant impairment on aircraft safety. Therefore, unless a significant impairment	

NPS EN-3 Relevant Paragraph	NPS EN-3 Detail	NPS EN-3 Scheme compliance
	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	
Cultural Heritage		
Paragraph 2.10.107	The impacts of solar PV developments on the historic environment will require expert assessment in most cases and may have effect both above and below ground.	**Chapter 7: Cultural Heritage, ES Volume 1 [APP-059]** undertakes an assessment on the historic environment, including above and below ground assets. 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. **Chapter 7: Cultural Heritage, ES Volume 1 [APP-059**] 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.
Paragraph 2.10.108	Above ground impacts may include the effects on the setting of Listed Buildings and other designated heritage assets as well as on Historic Landscape Character.	
Paragraph 2.10.109	Below ground impacts, although generally limited, may include direct impacts on archaeological deposits through ground disturbance associated with trenching, cabling, foundations, fencing, temporary haul routes etc.	
Paragraph 2.10.110	Equally solar PV developments may have a positive effect, for example archaeological assets may be protected by a solar PV farm as the site is removed from regular ploughing and shoes or low-level piling is stipulated.	
Paragraph 2.10.112	Applicant assessments should be informed by information from Historic Environment Records (HERs) or the local authority.	The assessment set out in **Chapter 7: Cultural Heritage, ES Volume 1 [APP-059]** has been informed by the HER. A detailed baseline is set out in the DBA, **Appendix 7-2: Cultural Heritage Desk-Based Assessment, ES Volume 2 [APP-080]**, which also contains a gazetteer of heritage assets. The location of heritage assets, previous archaeological events and indicative illustrations of historic landscape character are presented in **Figure 7-1** to **Figure 7-4** in **ES Volume 3 [APP-145-APP-148]**. An archaeological trial trenching report is submitted as **Appendix 7-4: Archaeological Trial Trenching Evaluation Report, ES Volume 2 [APP-082]**. The scope of this report has been agreed during consultation meetings with North Yorkshire Council. An updated Trial Trenching Report is submitted for Deadline 1, which comprises a final Trial Trench Evaluation Assessment Report replacing the Trial Trench Evaluation Report submitted with the application.
Paragraph 2.10.113	Where a site on which development is proposed includes, or has the potential to, include heritage assets with archaeological interest, the applicant should submit an appropriate desk-based assessment and, where necessary, a field evaluation. These should be carried out, using expertise where necessary and in consultation with the local planning authority, and should identify archaeological study areas and propose appropriate schemes of investigation, and design measures, to ensure the protection of relevant heritage assets	
Paragraph 2.10.114	In some instances, field studies may include investigative work (and may include trial trenching beyond the boundary of the proposed site) to assess the impacts of any ground disturbance, such as proposed cabling, substation foundations or mounting supports for solar panels on archaeological assets.	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 [APP-059]**. The trial trenching report is submitted as **Appendix 7-4: Archaeological Trial Trenching Evaluation Report, ES Volume 2 [APP-082]**. An updated Trial Trenching Report is submitted for Deadline 1, which comprises a final Trial Trench Evaluation Assessment Report replacing the Trial Trench Evaluation Report submitted with the application.
Paragraph 2.10.115	The extent of investigative work should be proportionate to the sensitivity of, and extent of proposed ground disturbance in, the associated study area	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 [APP-082]**. An updated Trial Trenching Report is submitted for Deadline 1, which comprises a final Trial Trench Evaluation Assessment Report replacing the Trial Trench Evaluation Report submitted with the application

NPS EN-3 Relevant Paragraph	NPS EN-3 Detail	NPS EN-3 Scheme compliance
Paragraph 2.10.116	Applicants should take account of the results of historic environment assessments in their design proposal	**The Design and Access Statement [APP-234]** sets out how the Scheme has taken account of the results of the historic assessment in its design.
Paragraph 2.10.117	Applicants should consider what steps can be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting.	**Chapter 7: Cultural Heritage, ES Volume1 [APP-059]** describes the heritage assets within the study area for the Scheme and their significance, and the contribution of their setting to that significance. Section 7.6 of Chapter 7: **Cultural Heritage, ES Volume1 [APP-059]** 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. Sections 7.7 and 7.8 of **Chapter 7: Cultural Heritage, ES Volume1 [APP-059]** 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 the setting of heritage assets due to the Scheme being visible from or present within the setting.
Paragraph 2.10.118	As the significance of a heritage asset derives not only from its physical presence but also from its setting, careful consideration should be given to the impact of large-scale solar farms which depending on their scale, design and prominence, may cause substantial harm to the significance of the asset.	
Paragraph 2.10.119	Applicants may need to include visualisations to demonstrate the effects of a proposed solar farm on the setting of heritage assets.	
Paragraph 2.10.137	The ability of the applicants to microsite specific elements of the proposed development during the construction phase should be an important consideration by the Secretary of State when assessing the risk of damage to archaeology.	The Scheme will be in accordance with the parameters set out in the **Design Principles Statement [APP-235]**, 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 2.10.138	Where requested by the applicant, the Secretary of State should consider granting consents which allow for the micrositing within a specified tolerance of elements of the permitted infrastructure so that precise locations can be amended during the construction phase if unforeseen circumstances, such as the discovery of previously unknown archaeology, arise.	
Paragraph 2.10.160	Solar farms are generally consented on the basis that they will be time-limited in operation. The Secretary of State should therefore consider the length of time for which consent is sought when considering the impacts of any indirect effect on the historic environment, such as effects on the setting of designated heritage assets	As stated in **Chapter 2: The Scheme, ES Volume 1 [APP-054],** the design life of the Scheme is expected to be 40 years. **Chapter 7: Cultural Heritage, ES Volume1 [APP-059]** 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 [APP-059]** 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 longer duration than that outlined in **Chapter 2: The Scheme, ES Volume 1 [APP-054].**
Paragraph 2.10.162	The Secretary of State is unlikely to give any more than limited weight to traffic and transport noise and vibration impacts from the operational phase of a project.	**Chapter 13: Transport and Access, ES Volume 1 [APP-065]** 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.
Construction including traffic and transport noise and vibration		
Paragraph 2.10.120	Modern solar farms are large sites that are mainly comprised of small structures that can be transported separately and constructed on-site, with developers designating a compound on-site for the delivery and assemblage of the necessary components.	**Chapter 13: Transport and Access, ES Volume 1 [APP-065] and Chapter 2: The Scheme, ES Volume 1 [APP-054]** 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.

NPS EN-3 Relevant Paragraph	NPS EN-3 Detail	NPS EN-3 Scheme compliance
Paragraph 2.10.121	Many solar farms will be sited in areas served by a minor road network. Public perception of the construction phase of solar 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.	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. 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 [APP-113]** submitted with the Application in **Appendix 13-5, ES Volume 2 [APP-113].** 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 [APP-113]** 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. An updated Framework CTMP is submitted at Deadline 1 of the Examination.
Paragraph 2.10.123	Applicants should assess the various potential routes to the site for delivery of materials and components where the source of the materials is known at the time of the application and select the route that is the most appropriate.	**Chapter 13: Transport and Access, ES Volume 1 [APP-065]** 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 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 [APP-113]** is presented at **Appendix 13-5, ES Volume 2 [APP-113]**. This will be updated to a detailed CTMP post-consent and prior to start of construction (secured through the DCO). The **Framework CTMP [APP-113]** 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. An updated Framework CTMP is submitted at Deadline 1 of the Examination.
Paragraph 2.10.124	Where the exact location of the source of construction materials, such as crushed stone or concrete is not be known at the time of the application applicants should assess the worst-case impact of additional vehicles on the likely potential routes.	
Paragraph 2.10.125	Applicants should ensure all sections of roads and bridges on the proposed delivery route can accommodate the weight and volume of the loads and width of vehicles. Although unlikely, where modifications to roads and/or bridges are required, these should be identified, and potential effects addressed in the ES	**Chapter 13: Traffic and Transport, ES Volume 1 [APP-065]** 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). 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 [APP-113]** and **Framework DEMP [APP-240].**
Paragraph 2.10.126	Where a cumulative impact is likely because multiple energy infrastructure developments are proposing to use a common port and/or access route and pass through the same towns and villages, applicants should include a cumulative transport assessment as part of the ES. This should consider the impacts of abnormal traffic movements relating to the project in question in combination with those from any other relevant development. Consultation with the relevant local highways authorities is likely to be necessary	**Chapter 13: Traffic and Transport, ES Volume 1 [APP-065]** 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.

NPS EN-3 Relevant Paragraph	NPS EN-3 Detail	NPS EN-3 Scheme compliance
		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 17-1: Cumulative Schemes ES Volume 2 [APP-125].** 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 [APP-065]** 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 [APP-065].**
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 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.	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 Monitoring of **Chapter 15: Soils and Agricultural Land, ES Volume 1 [APP-067]**, and further described in the **Framework CEMP [APP-238]** and **Framework Soil Management Plan [APP-241]** 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.
Paragraph 2.10.127	In some cases, the local highway authority may request that the Secretary of State impose controls on the number of vehicle movements to and from the solar farm site in a specified period during its construction and, possibly, on the routeing of such movements particularly by heavy vehicles	**Chapter 13: Transport and Access, ES Volume 1 [APP-065] and Chapter 2: The Scheme, ES Volume 1 [APP-054] 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. 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. 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 [APP-113].** An updated Framework CTMP is submitted at Deadline 1 of the Examination. 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 2.10.140	Where the Secretary of State agrees that this is necessary, requirements could be imposed on development consent.	
Paragraph 2.10.141	Where cumulative effects on the local road network or residential amenity are predicted from multiple solar farm developments, it may be appropriate for applicants for various projects to work together to ensure that the number	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 17-1: Cumulative Schemes ES Volume 2 [APP-125].**

NPS EN-3 Relevant Paragraph	NPS EN-3 Detail	NPS EN-3 Scheme compliance
	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.	**Chapter 13: Traffic and Transport, ES Volume 1 [APP-065]** 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.
Paragraph 2.10.142	It may also be appropriate for the highway authority to set limits for and coordinate these deliveries through active management of the delivery schedules through the abnormal load approval process.	The Applicant has engaged with other developments, including Drax and Helios, to discuss how the projects would interact with each other.
Paragraph 2.10.143	Once consent for a scheme has been granted, applicants should liaise with the relevant local highway authority (or other coordinating body) regarding the start of construction and the broad timing of deliveries. Applicants may need to agree a planning obligation to secure appropriate measures, including restoration of roads and verges.	The Applicant has continued to liaise with local highway authorities following submission of the Application and will continue to throughout the DCO process. 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 2.10.144	Further it may be appropriate for any non-permanent highway improvements carried out for the development (such as temporary road widening) to be made available for use by other subsequent solar farm developments	
Paragraph 2.10.161	Once solar farms are in operation, traffic movements to and from the site are generally very light, in some instances as little as a few visits each month by a light commercial vehicle or car. Should there be a need to replace machine components, this may generate heavier commercial vehicle movements, but these are likely to be infrequent.	**Chapter 13: Transport and Access, ES Volume 1 [APP-065]** states that during the operational phase, there is not expected to be more than four visitors to the site 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 2.10.162	The Secretary of State is unlikely to give any more than limited weight to traffic and transport noise and vibration impacts from the operational phase of a project.	An assessment of the Schemes impact on noise and vibration is presented in **Chapter 11: Noise and Vibration, ES Volume 1 [APP-063].** There is not anticipated to be any significant impact on noise and vibration from traffic and transport as a result of the Scheme.

National Policy Statement for Electricity Networks Infrastructure EN-5, November 2023

Table 3 National Policy Statement for Electricity Networks Infrastructure EN-5, November 2023

NPS EN-5 Relevant Paragraph	NPS EN-5 Detail	NPS EN-5 Scheme compliance
Background		
Paragraph 1.1.5	As identified in EN-1, government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. This includes: for electricity grid infrastructure, all power lines in scope of EN-5 including network reinforcement and upgrade works, and associated infrastructure such as substations. This is not limited to those associated specifically with a particular generation technology, as all new grid projects will contribute towards greater efficiency in constructing, operating and connecting low carbon infrastructure to the National Electricity Transmission System. These are viewed by the government as being CNP infrastructure and should be progressed as quickly as possible.	The **Statement of Need [APP-232]** 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 includes grid infrastructure to connect the Solar PV Site to the National Grid Drax Substation where an export connection to the transmission network will be provided . This Policy recognises that national significant low carbon infrastructure such as the Scheme is a CNP.
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 location, 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 [APP-054]** and set out in the **Design Principles Statement [APP-235]** and **Design and Access Statement [APP-234].**
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 [APP-234]** and Section 6.3 of the **Planning Statement [APP-233],** 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 [APP-234]** 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 [APP-058]**. 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 4.10 of EN-1 sets out the generic considerations that applicants and the Secretary of State should take into account in order to ensure that	

NPS EN-5 Relevant Paragraph	NPS EN-5 Detail	NPS EN-5 Scheme compliance
	electricity networks infrastructure is resilient to the effects of climate change.	As outlined in **Chapter 6: Climate Change of the ES [APP-058]**, 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: 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 [APP-113])** 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 [APP-233],** 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 [APP-238].** 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 [APP-059].** 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 [APP-238], Framework OEMP [APP-239]** and **Framework DEMP [APP-240]** 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 2.3.2	As climate change is likely to increase risks to the resilience of some of this infrastructure, from flooding for example, or in situations where it is located near the coast or an estuary or is underground, applicants should in particular set out to what extent the proposed development is expected to be vulnerable, and, as appropriate, how it has been designed to be resilient to: • flooding, particularly for substations that are vital to the network; and especially in light of changes to groundwater levels resulting from climate change; • the effects of wind and storms on overhead lines; • higher average temperatures leading to increased transmission losses; • earth movement or subsidence caused by flooding or drought (for underground cables); and • coastal erosion – for the landfall of offshore transmission cables and their associated substations in the inshore and coastal locations respectively	

NPS EN-5 Relevant Paragraph	NPS EN-5 Detail	NPS EN-5 Scheme compliance
Paragraph 2.3.3	Section 4.10 of EN-1 advises that the resilience of the project to the effects of climate change must be assessed in the Environmental Statement (ES) accompanying an application. For example, future increased risk of flooding would be covered in any flood risk assessment (see Sections 5.8 in EN-1). Consideration should also be given to coastal change (see section 5.6 in EN-1).	**Chapter 6: Climate Change, ES Volume 1 [APP-058]** assesses the Climate Change Impacts of the Scheme 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 [APP-059]**and the **FRA (Appendix 9-3, ES Volume 2 [APP-097]).**
Paragraph 2.8.4	The Secretary of State should also take into account that Transmission Owners (TOs) and Distribution Network Operators (DNOs) are required under Section 9 of the Electricity Act 1989 to bring forward efficient and economical proposals in terms of network design.	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 [APP-236].** **Chapter 11: Noise & Vibration, ES Volume 1 [APP-063]** 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 adverse effects of noise from the 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 [APP-235].**
Paragraph 2.8.5	TOs and DNOs are also required to facilitate competition in the generation and supply of electricity, and electricity distributors have a statutory duty to provide a connection where requested.	
Paragraph 2.9.37	Audible noise effects can also arise from substation equipment such as transformers, quadrature boosters and mechanically switched capacitors.	
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. The BNG report has been updated and is submitted at Deadline 1 of the Examination. Long-term management of the Schemes landscape mitigation and screening is set out within the **Framework LEMP [APP-246].**
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	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 Environmental Topics, ES Volume 1 [APP-068].**

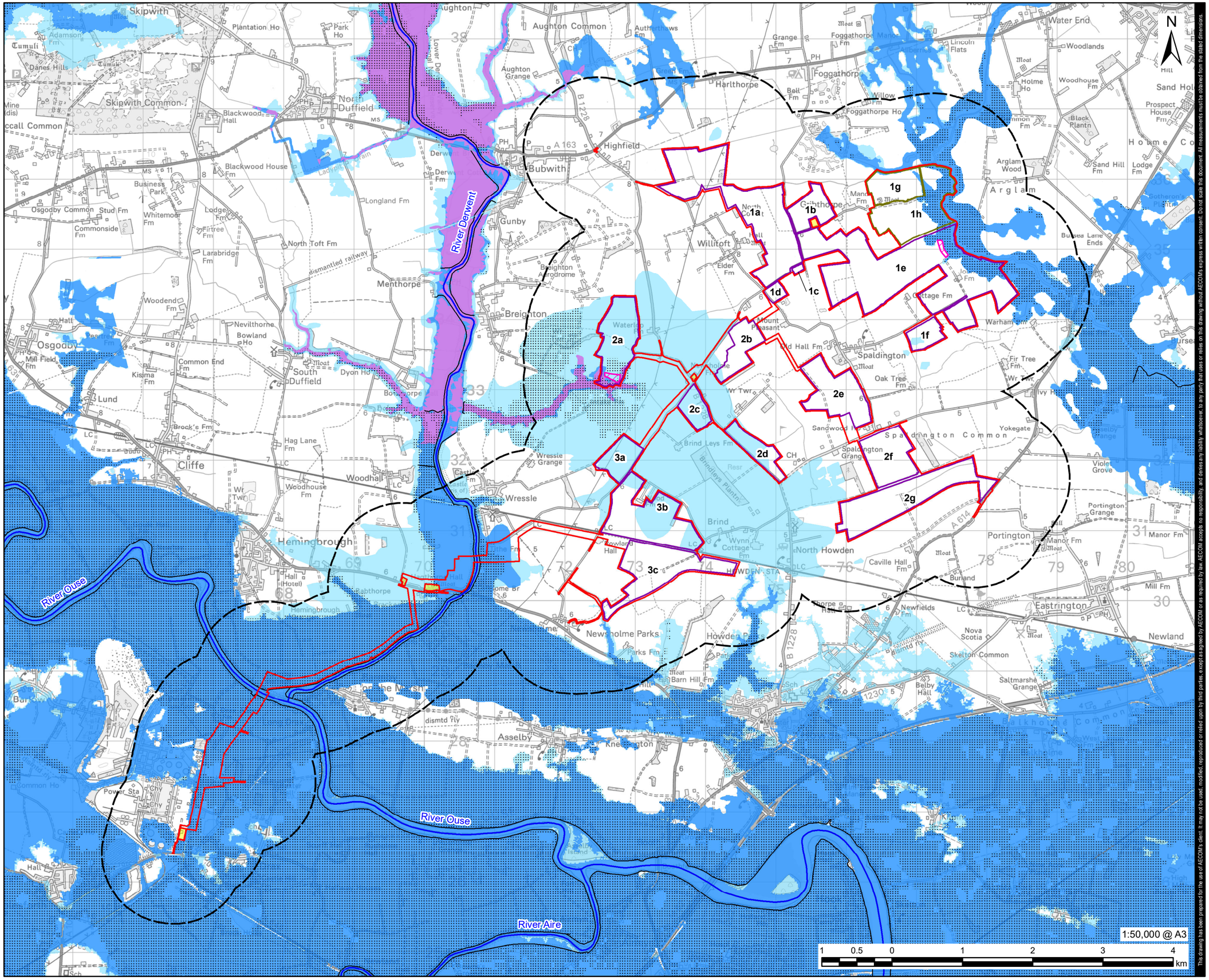
NPS EN-5 Relevant Paragraph	NPS EN-5 Detail	NPS EN-5 Scheme compliance
	in accordance with the Code of Practice to minimise EMFs; and -any new advice emerging from the Department of Health and Social Care relating to government policy for EMF exposure guidelines	As set out in **Chapter 2: The Scheme ES Volume 1 [APP-054]**, it has been confirmed that there are no overhead electricity cables used or constructed as part of the Scheme. Relevant emerging policy is considered within the assessment at ES.
Paragraph 2.11.13	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	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. An assessment of Electric and Electro Magnetic Fields is set out in **Chapter 16: Other Environmental Topics, ES Volume 1 [APP-068]**. 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.
Paragraph 2.11.14	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 01/03, or any successor, when considering recommendations for DCO applications. More detail on this issue can be found in Section 5.5 of EN-1.	
Paragraph 2.11.15	Where a statutory consultee on the safeguarding of technical facilities identifies a risk that the EMF effect of electricity network infrastructure would compromise the effective and safe operation of such facilities, the potential impact and siting and design alternatives will need to have been fully considered as part of the application	
Paragraph 2.14.2	In the assessments of their designs, applicants should demonstrate: • 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; • 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); • how the construction planning for the proposals has been co-ordinated with that for other similar projects in the area on a similar timeline;	As detailed in the **Design and Access Statement [APP-234]** and Section 6.3 of the **Planning Statement [APP-233],** 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, Volume 1 of the ES [APP-054]**and the **Design and Access Statement [APP-234].** 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 [APP-060]**, and the **Framework CEMP [APP-238]** 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 [APP-060]** 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 [APP-233].**

NPS EN-5 Relevant Paragraph	NPS EN-5 Detail	NPS EN-5 Scheme compliance
	• how enhancements to the landscape and environmental assets may contribute to overall landscape and townscape quality as set out in EN 14.6.13 and 5.10.23; • how the mitigation hierarchy has been followed, in particular to avoid the need for compensatory measures for coastal, inshore and offshore developments affecting SACs SPAs, and Ramsar sites and MCZs as set out in EN-3 2.8; • For designated landscapes the principal mitigation measure, as established by the Holford Rules, should be to seek to avoid landfall in these areas.	The Biodiversity Net Gain (BNG) report using Natural England's Biodiversity Metric 4.0 has been updated for Deadline 1 of the Examination. This report demonstrates that the Scheme will deliver 80.42% BNG for area-based units, 10.30% BNG for hedgerow units and 10.09% BNG for watercourse units. Therefore, the Scheme delivers significant biodiversity net gain on the site, with at least 10% BNG across the whole Site. The Applicant has engaged with other developments, including Drax and Helios, to discuss how their projects would interact with the Scheme. The **Framework CEMP [APP-238]** provides a construction programme for the Scheme. A detailed CEMP which will be substantially in accordance with the **Framework CEMP [APP-238]** will be prepared and approved by the local planning authority prior to construction and be secured by a requirement in Schedule 2 of the DCO. **Chapter 10: Landscape and Visual Impact, ES Volume 1 [AS-014]** and the **Design and Access Statement [APP-234] considers** how mitigation planting may contribute to the overall landscape quality.

Appendix B Figure 1- Fluvial Flood Risk, showing Flood Zone 3b

Revision: 1 Drawn: LP Checked: JW Approved: SB Date: 2024-06-12

Filename: I:\5004 - Information Systems\60683115_Boom Power\02_Maps\Post DCO SubmissionWater_FRAWAT_PostDCO_Fig1_Fluvial_Flood_Risk_A3_20240607_R1.mxd



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CLIENT

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CONSULTANT

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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)
- 1km Buffer of the Order limits
- Main River
- Flood Defence
- Flood Compensation Area
- Reduction in Risk of Flooding from Rivers and Sea due to Defences
- Flood Zone 2
- Flood Zone 3a
- Flood Zone 3b

All non-shaded areas are Flood Zone 1

NOTES

ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

Fluvial Flood Risk

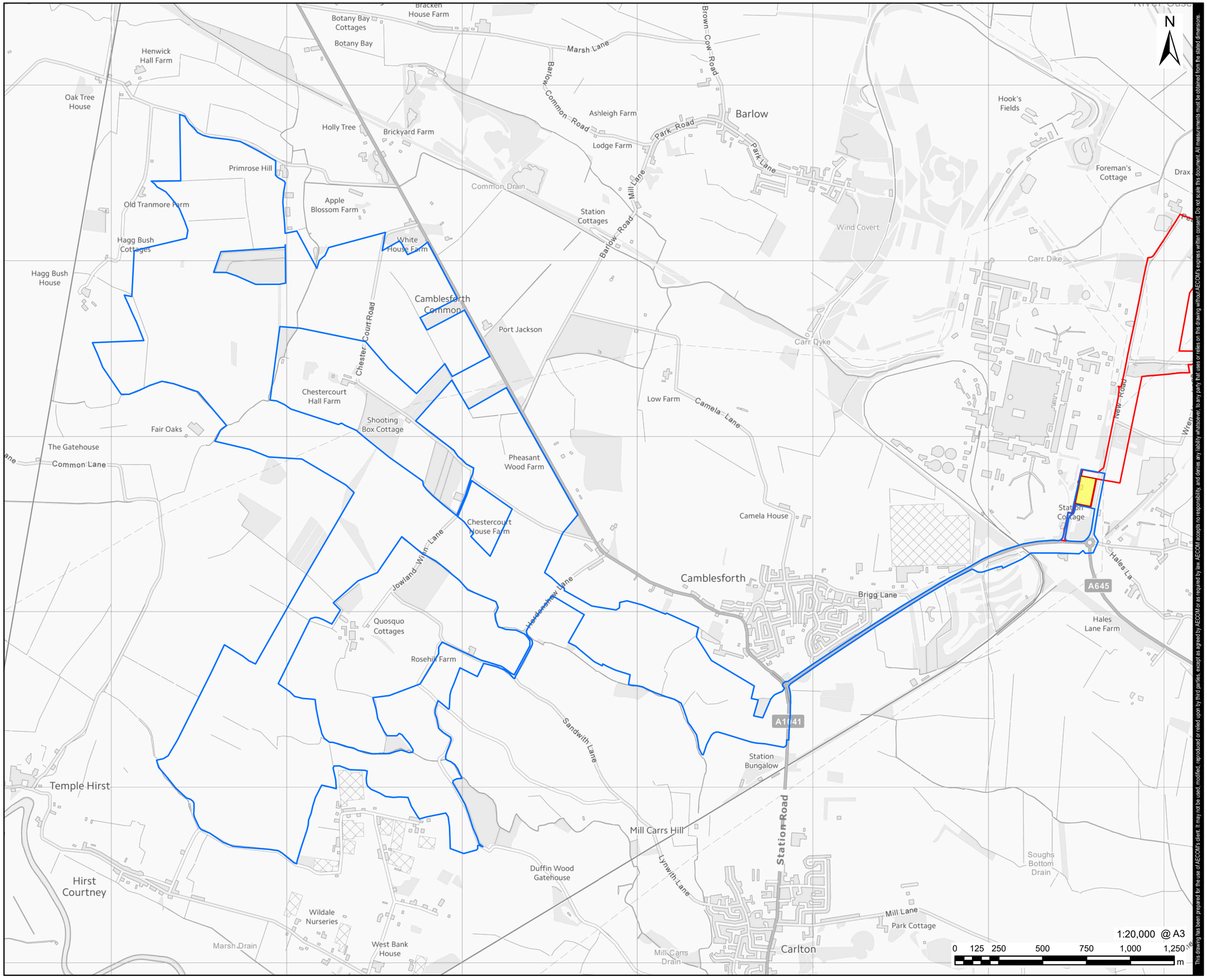
FIGURE NUMBER

Figure 1

Appendix C Figure showing application boundaries for the shortlisted cumulative schemes

Revision: 1 Drawn: LP Checked: JW Approved: LR Date: 2024-06-17

Filename: I:\60004 - Information Systems\60683115_Boom Power\02_Maps\Post DCO Submission\Cumulative Schemes\EYSF_PostDCO_Shortlist_Cumulative_Schemes_20240611.aprx 20240611



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LEGEND

- Order limits
- Land not included in the Order limits
- 1 - EN010140: Helios Renewable Energy Project
  Distance from Order limits: Intersects

NOTES

Application references EN070006 and 21/01448/EIASCO only show the scoping boundary not development boundary.

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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

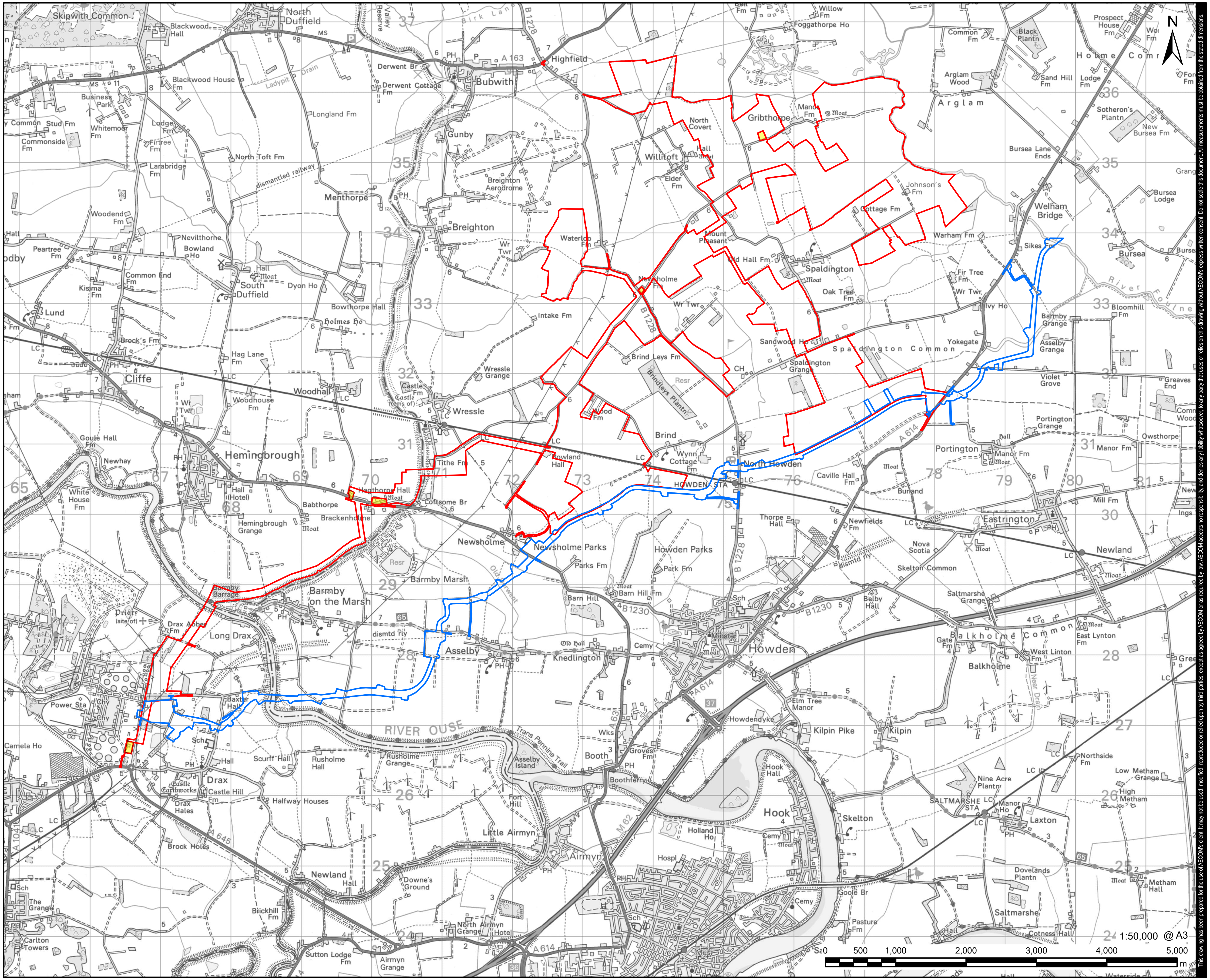
Application Boundaries for the shortlisted cumulative schemes
Sheet 1 of 41

FIGURE NUMBER

Appendix C

Revision: 1 Drawn: LP Checked: JW Approved: LR Date: 2024-06-17

Filename: I:\5004 - Information Systems\60683115_Boom Power\02_Maps\Post DCO Submission\Cumulative Schemes\EYSF_PostDCO_Shortlist_Cumulative_Schemes_20240611.aprx



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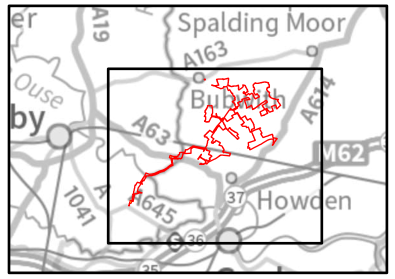
LEGEND

- Order limits
- Land not included in the Order limits
- 2 - 22/01990/STPLFE: Scotland to England Green Link (SEGL2) Distance from Order limits: Intersects



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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

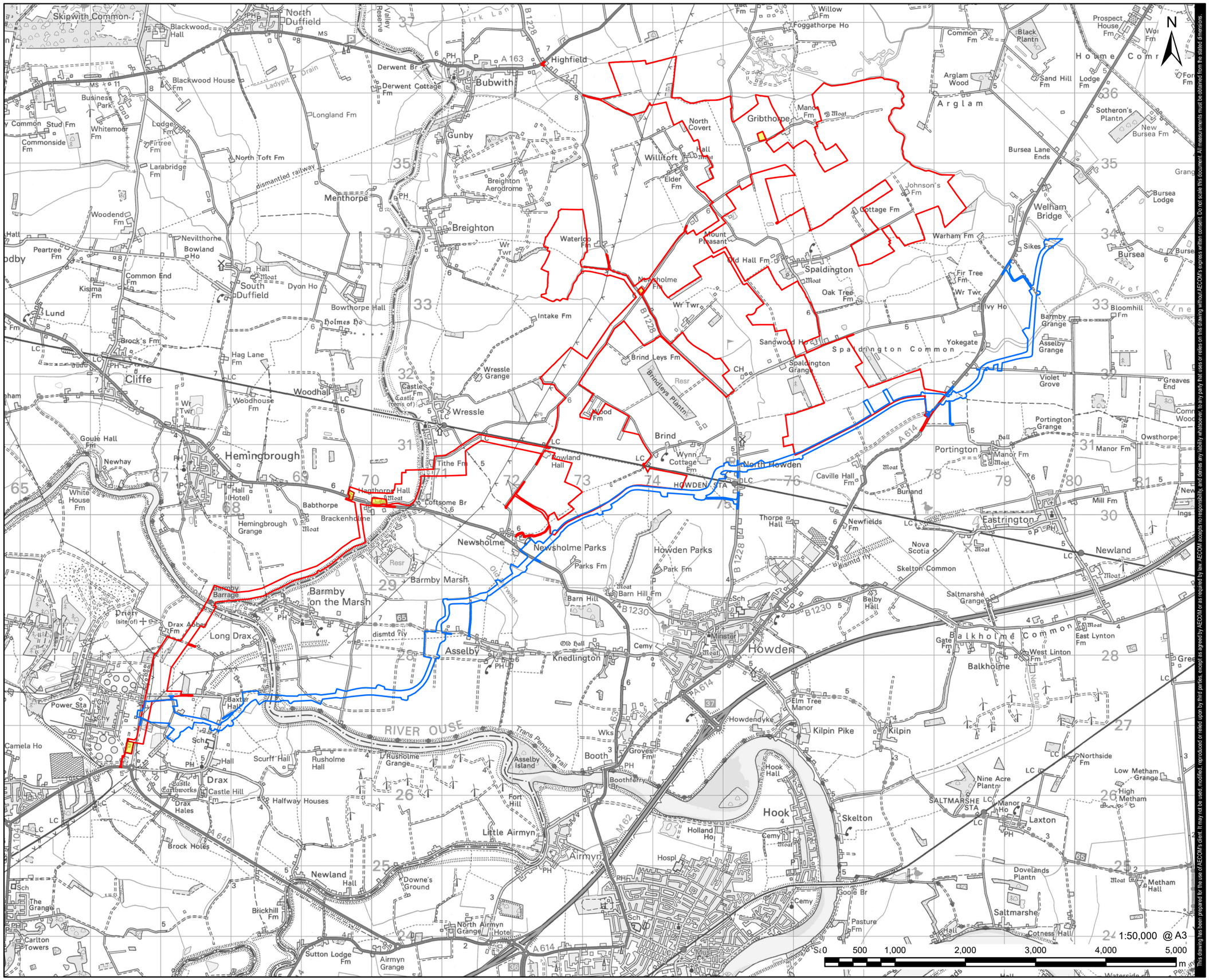
Application Boundaries for the shortlisted cumulative schemes
Sheet 2 of 41

FIGURE NUMBER

Appendix C

Revision: 1 Drawn: LP Checked: JW Approved: LR Date: 2024-06-17

Filename: I:\5004 - Information Systems\60683115_Boom Power\02_Maps\Post DCO Submission\Cumulative Schemes\EYSF_PostDCO_Shortlist_Cumulative_Schemes_20240611.aprx



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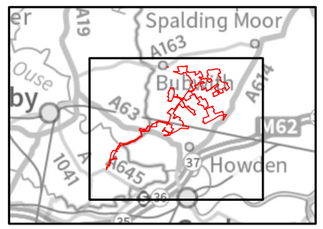
LEGEND

- Order limits
- Land not included in the Order limits
- 3 - 2022/0711/EIA: Scotland to England Green Link (SEGL2) Distance from Order limits: Intersects



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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

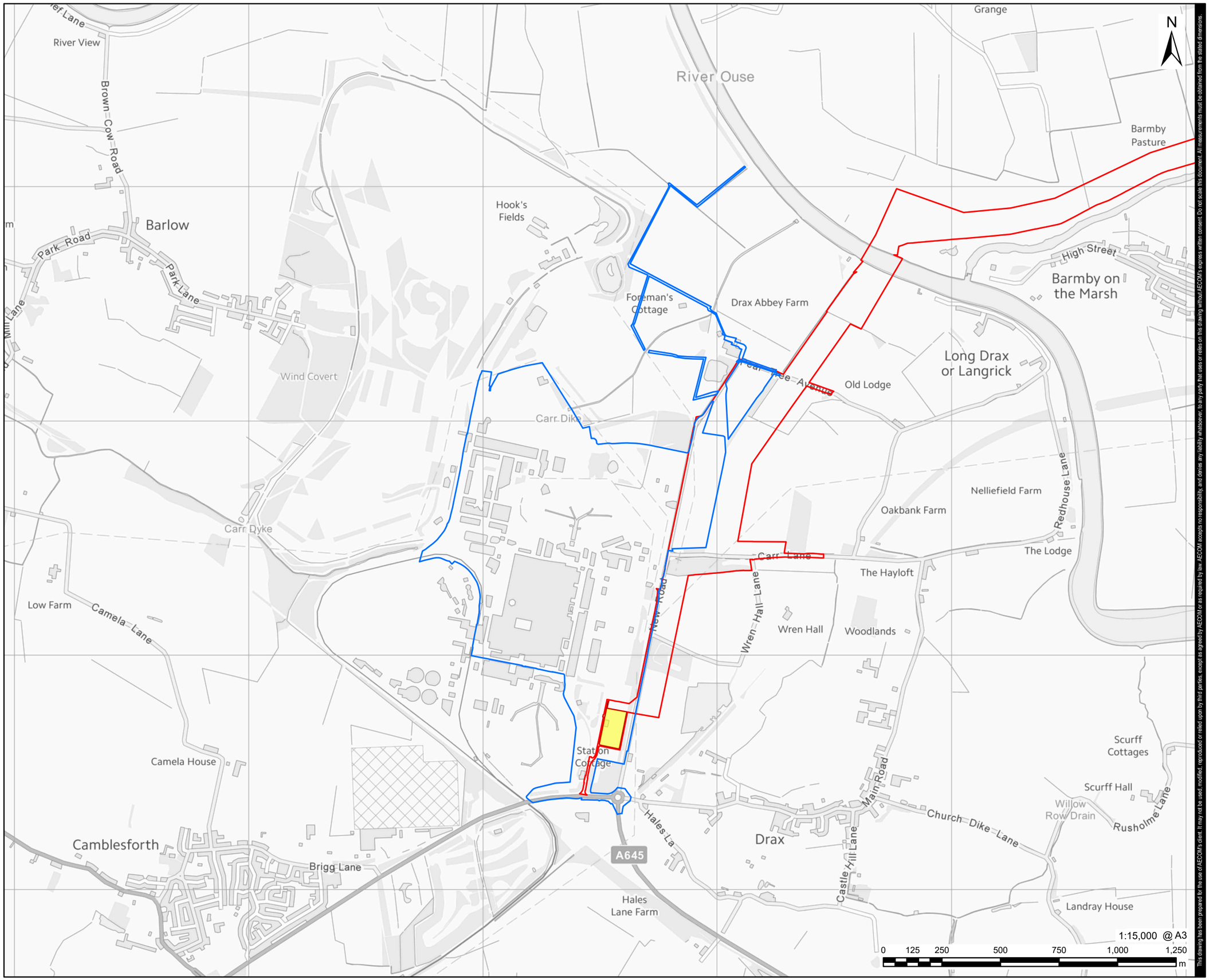
Application Boundaries for the shortlisted cumulative schemes
Sheet 3 of 41

FIGURE NUMBER

Appendix C

Revision: 1 Drawn: LP Checked: JW Approved: LR Date: 2024-06-17

Filename: I:\5004 - Information Systems\60683115_Boom Power\02_Maps\Post DCO Submission\Cumulative Schemes\EYSF_PostDCO_Shortlist_Cumulative_Schemes_20240611.aprx



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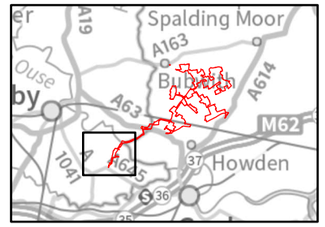
LEGEND

- Order limits
- Land not included in the Order limits
- 4 - EN010120: Drax Carbon Capture Distance from Order limits: Intersects



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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

Application Boundaries for the shortlisted cumulative schemes
Sheet 4 of 41

FIGURE NUMBER

Appendix C

Revision: 1 Drawn: LP Checked: JW Approved: LR Date: 2024-06-17

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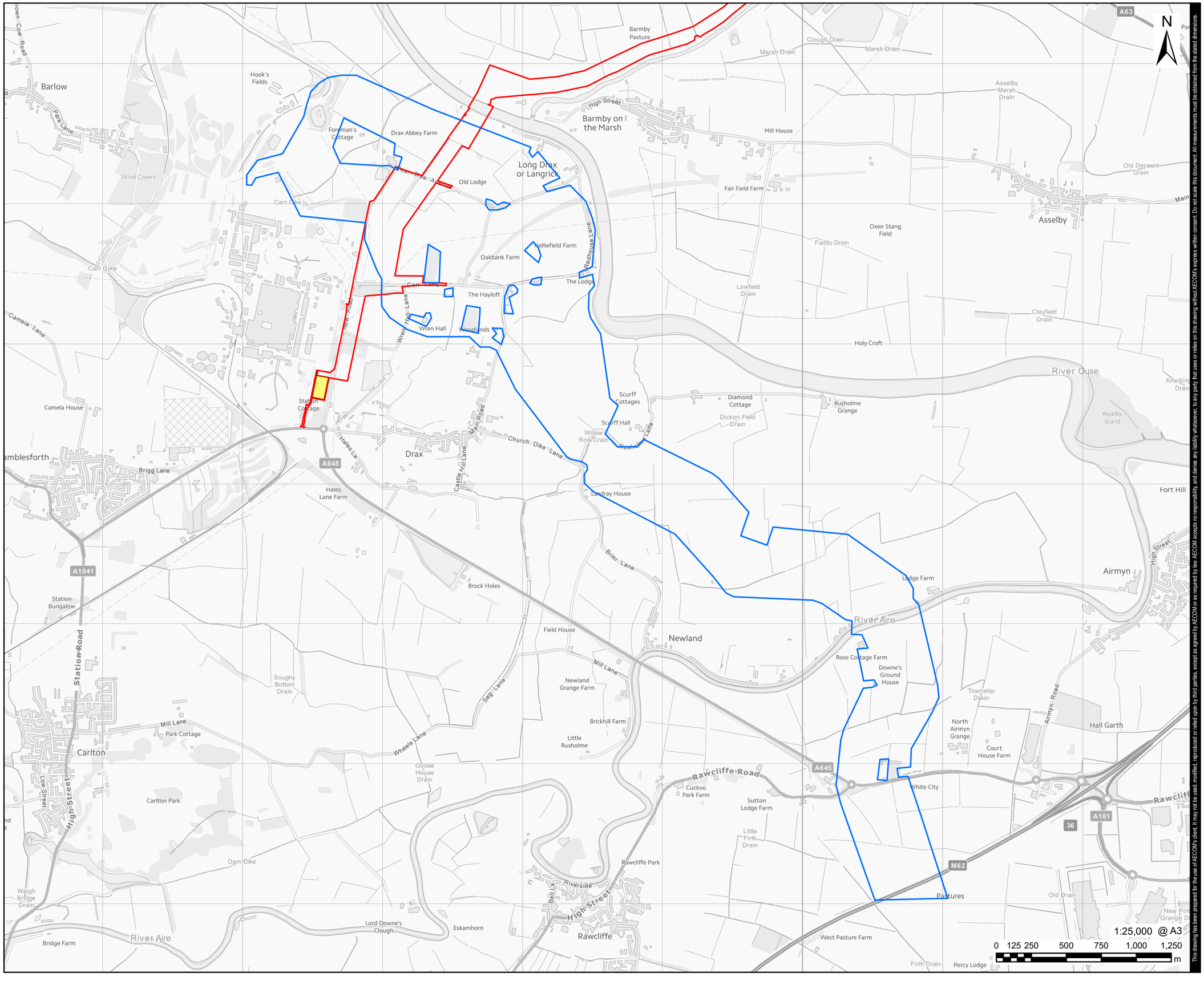

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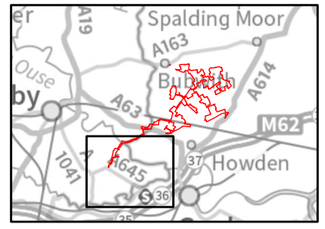
LEGEND

- Order limits
- Land not included in the Order limits
- 5 - EN070006: Humber Low Carbon Pipelines
  Distance from Order limits: Intersects



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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

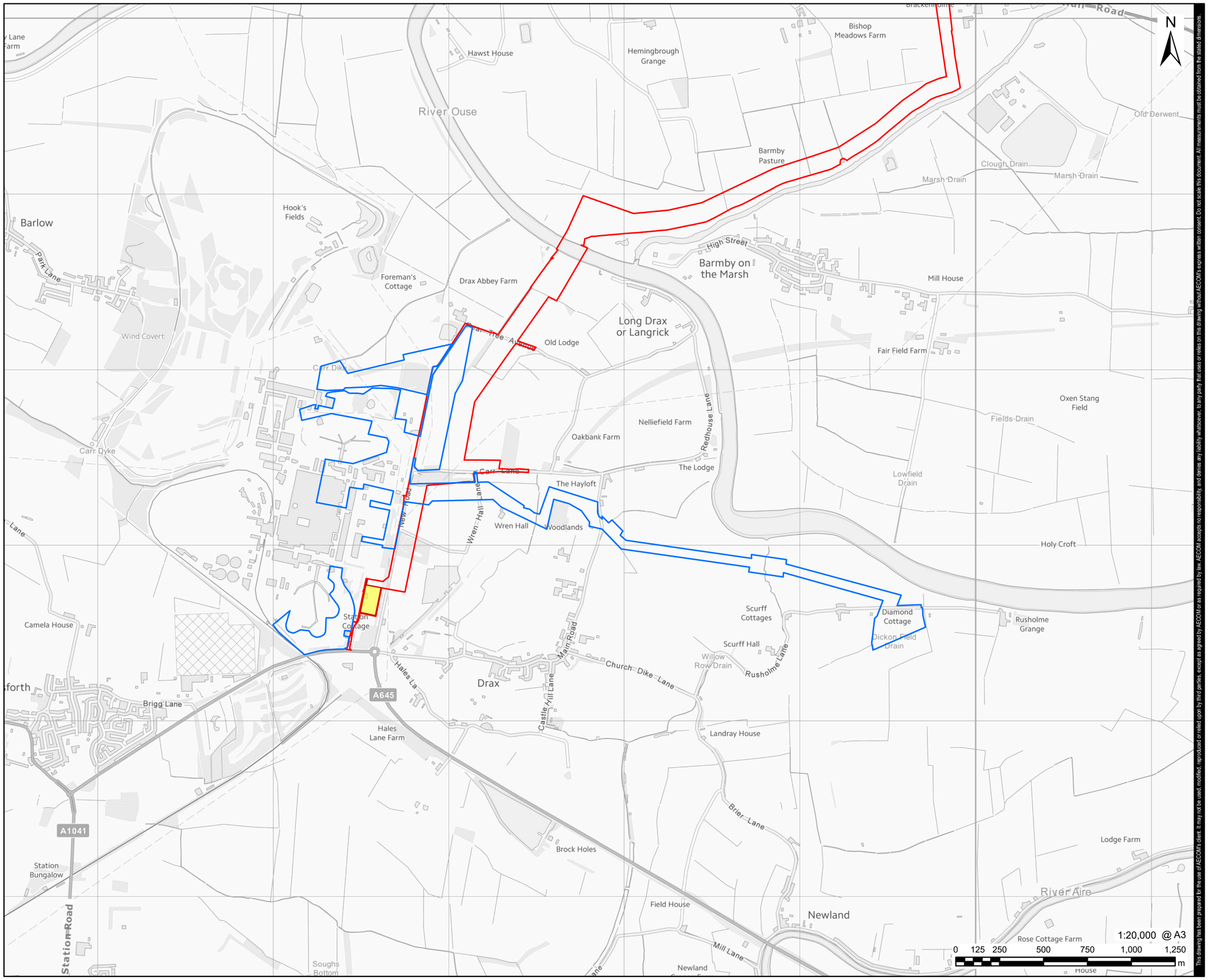
Application Boundaries for the shortlisted cumulative schemes
Sheet 5 of 41

FIGURE NUMBER

Appendix C

Revision: 1 Drawn: LP Checked: JW Approved: LR Date: 2024-06-17

Filename: I:\5004 - Information Systems\60683115_Boom Power\02_Maps\Post DCO Submission\Cumulative Schemes\EYSF_PostDCO_Shortlist_Cumulative_Schemes_20240611.aprx



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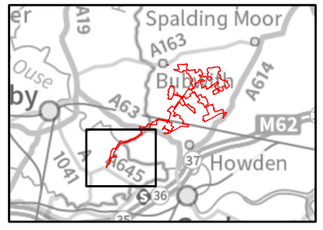
LEGEND

- Order limits
- Land not included in the Order limits
- 6 - EN010091: Drax Re-power. Distance from Order limits: Intersects



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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

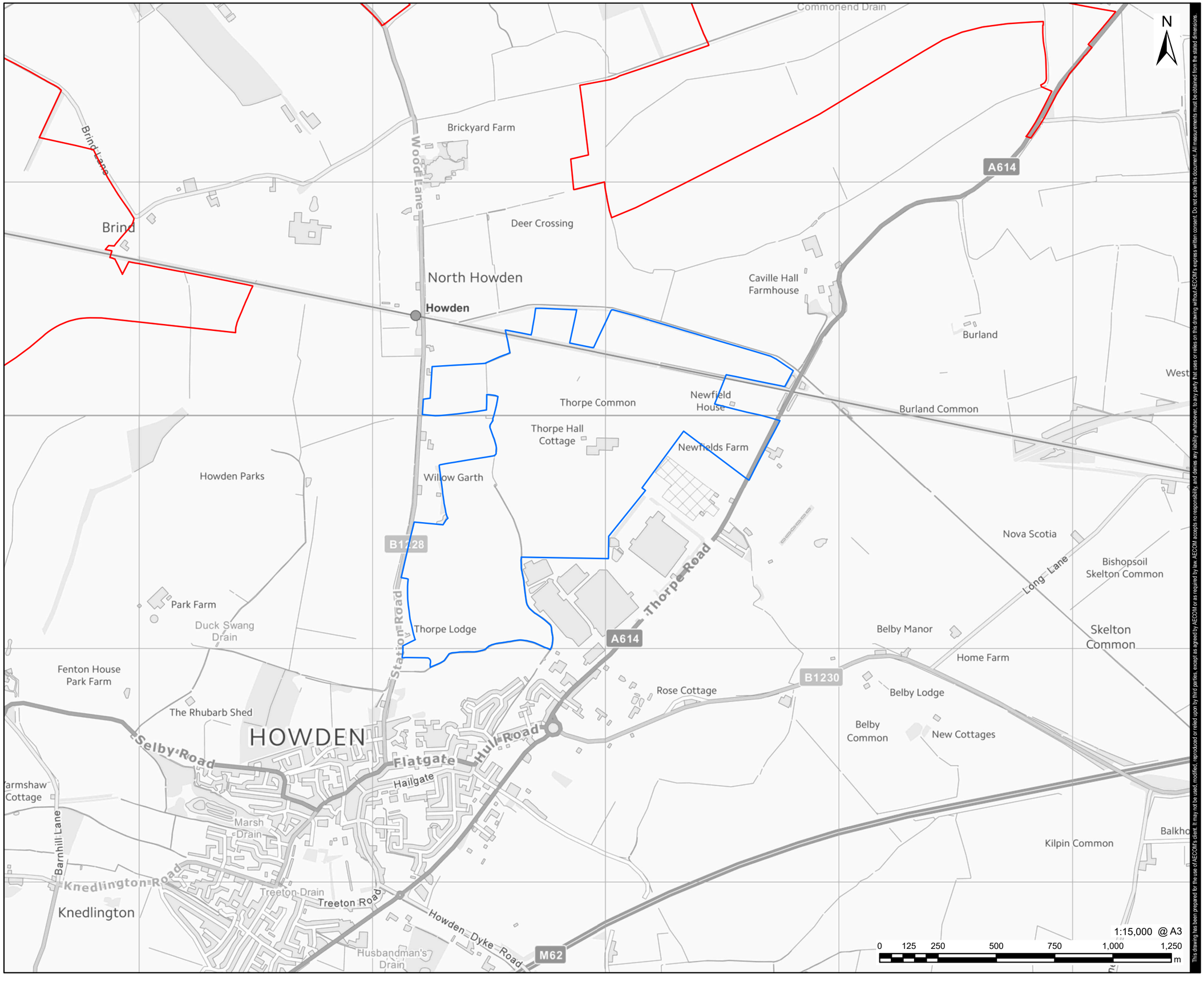
Application Boundaries for the shortlisted cumulative schemes
Sheet 6 of 41

FIGURE NUMBER

Appendix C

Revision: 1 Drawn: LP Checked: JW Approved: LR Date: 2024-06-17

Filename: I:\5004 - Information Systems\60683115_Boom Power\02_Maps\Post DCO Submission\Cumulative Schemes\EYSF_PostDCO_Shortlist_Cumulative_Schemes_20240611.aprx



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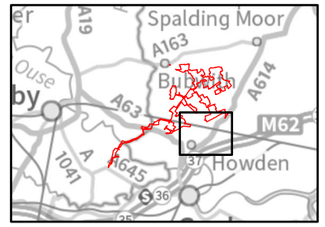
LEGEND

Order limits

7 - 22/02118/STPLFE: Relief Road and Residential development at Land South Of Thorpe Hall Thorpe Road Howden
Distance from Order limits: 394.8m South



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Application references EN070006 and 21/01448/EIASCO only show the scoping boundary not development boundary.

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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

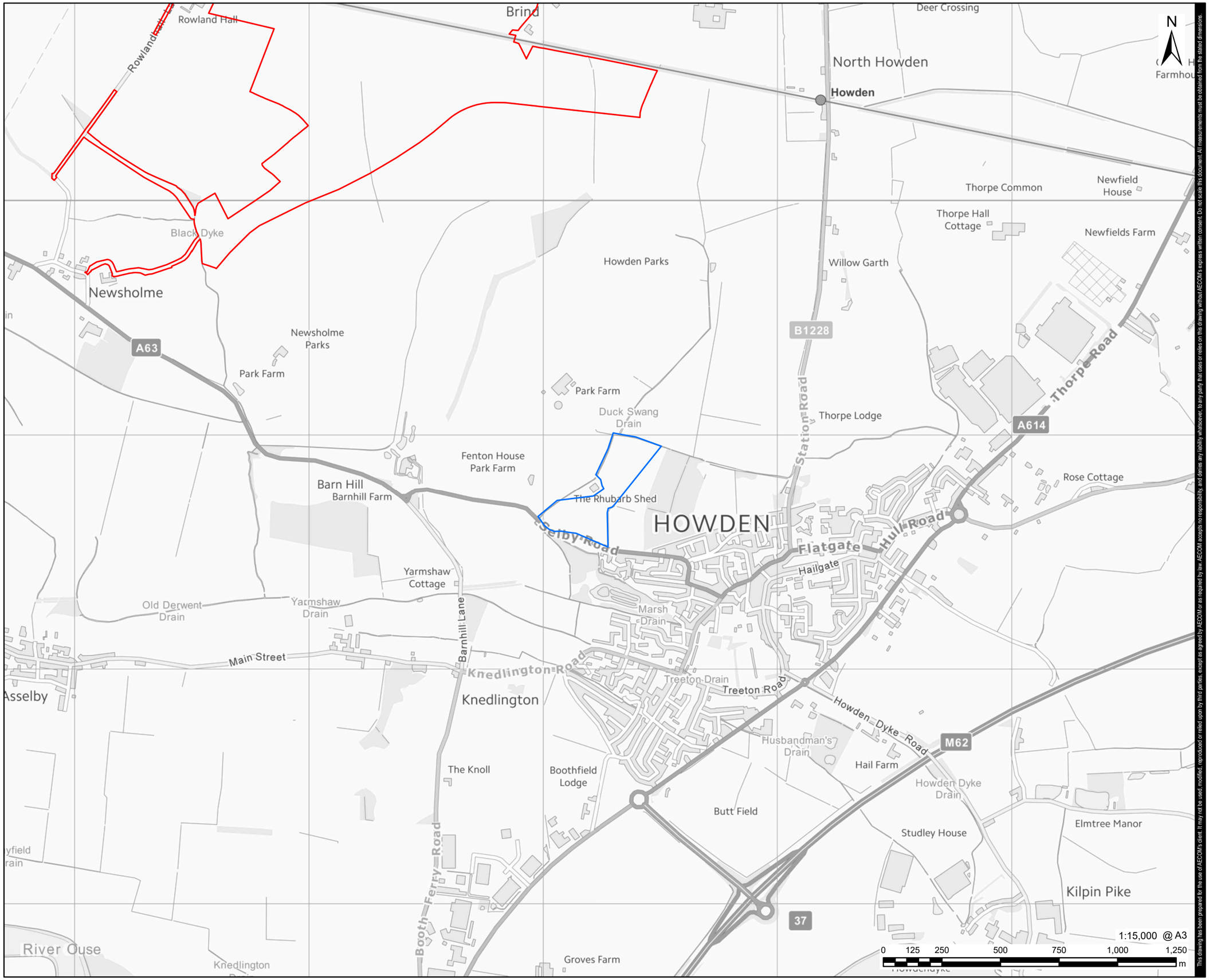
Application Boundaries for the shortlisted cumulative schemes Sheet 7 of 41

FIGURE NUMBER

Appendix C

Revision: 1 Drawn: LP Checked: JW Approved: LR Date: 2024-06-17

Filename: I:\5004 - Information Systems\60683115_Boom Power\02_Maps\Post DCO Submission\Cumulative Schemes\EYSF_PostDCO_Shortlist_Cumulative_Schemes_20240611.aprx



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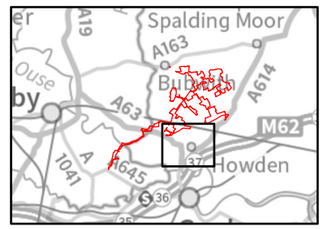
LEGEND

Order limits

8 - 22/30298/CONDET: Residential development at Land West Of Howden Parks
Distance from Order limits: 1351m South



NOTES

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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

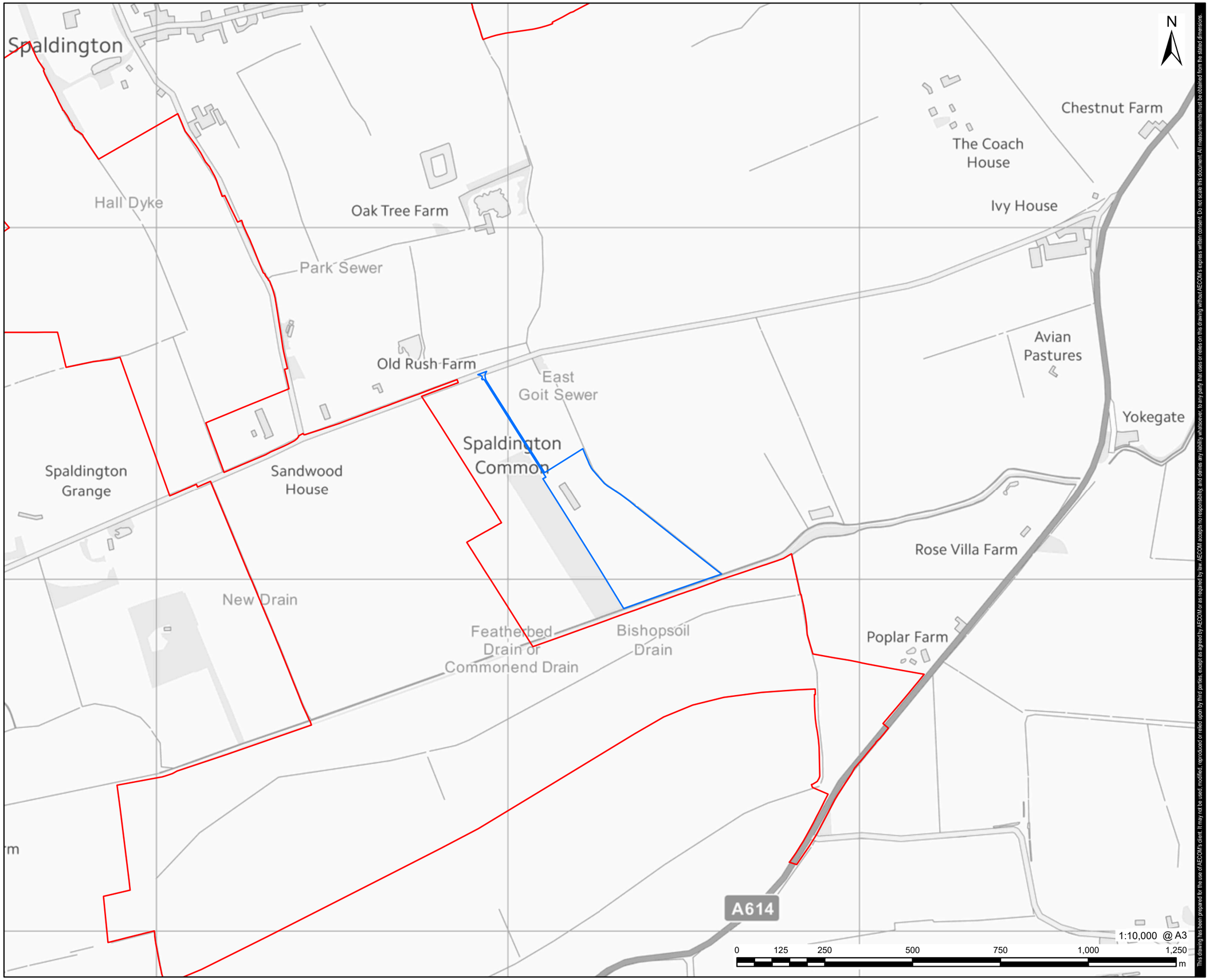
Application Boundaries for the shortlisted cumulative schemes
Sheet 8 of 41

FIGURE NUMBER

Appendix C

Revision: 1 Drawn: LP Checked: JW Approved: LR Date: 2024-06-17

Filename: I:\5004 - Information Systems\60683115_Boom Power\02_Maps\Post DCO Submission\Cumulative Schemes\EYSF_PostDCO_Shortlist_Cumulative_Schemes_20240611.aprx



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Basingstoke, RG21 7PP
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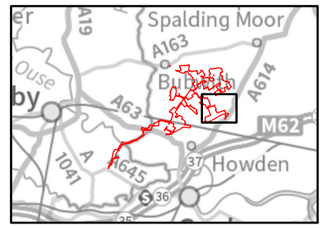
LEGEND

Order limits

15 - 20/01043/STPLFE: Poultry buildings at Old Rush Farm Spaldington Road
Distance from Order limits: 14.1m North



NOTES

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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

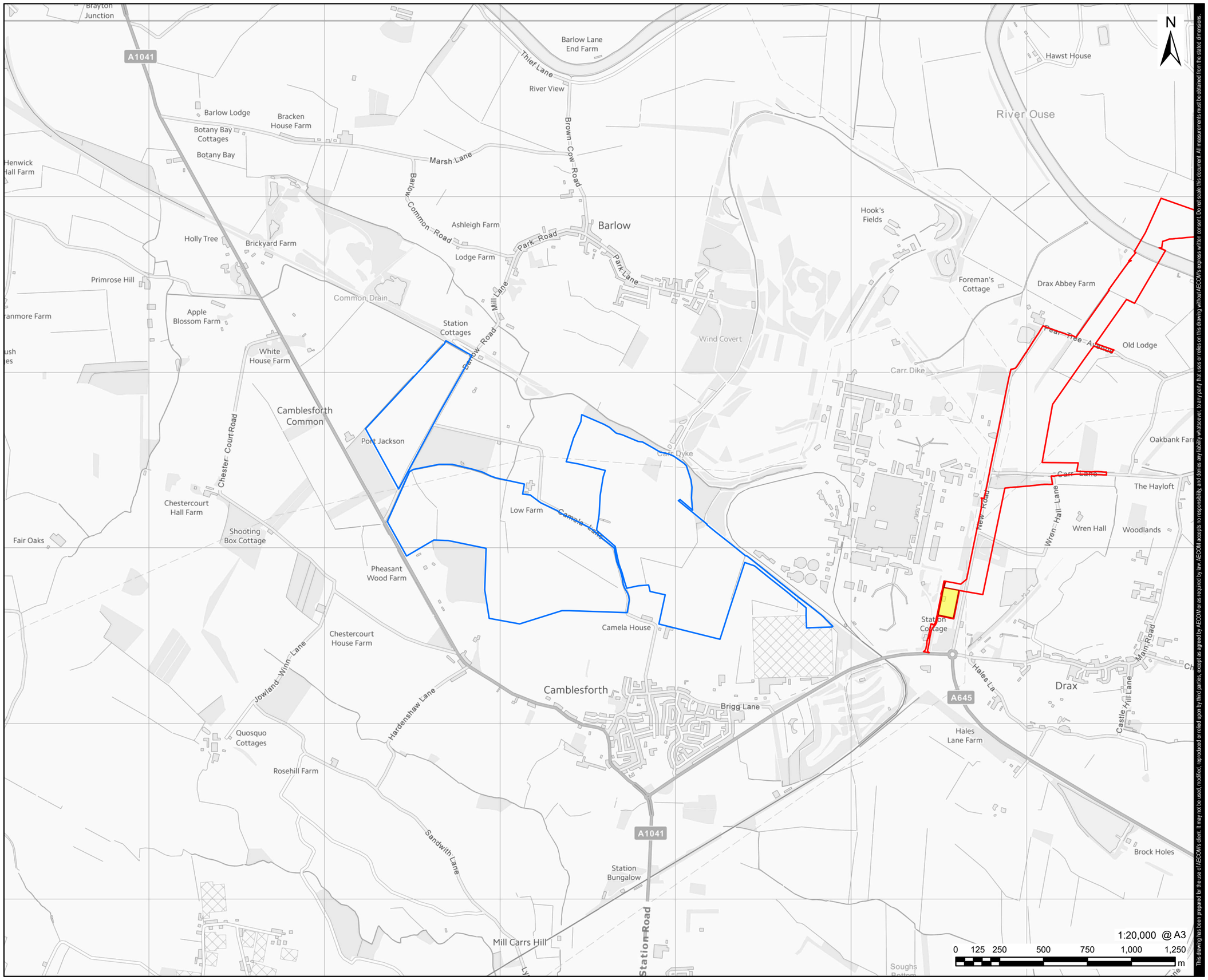
Application Boundaries for the shortlisted cumulative schemes
Sheet 9 of 41

FIGURE NUMBER

Appendix C

Revision: 1 Drawn: LP Checked: JW Approved: LR Date: 2024-06-17

Filename: I:\5004 - Information Systems\60683115_Boom Power\02_Maps\Post DCO Submission\Cumulative Schemes\EYSF_PostDCO_Shortlist_Cumulative_Schemes_20240611.aprx



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Basingstoke, RG21 7PP
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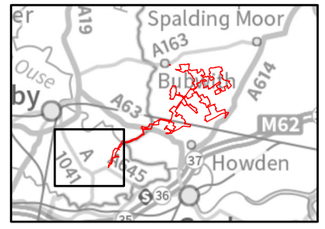
LEGEND

- Order limits
- Land not included in the Order limits
- 22 - 2020/0784/SCN: Solar Farm at and Land Off Camela Lane Distance from Order limits: 536.9m West



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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

Application Boundaries for the shortlisted cumulative schemes
Sheet 10 of 41

FIGURE NUMBER

Appendix C

Revision: 1 Drawn: LP Checked: JW Approved: LR Date: 2024-06-17

Filename: I:\5004 - Information Systems\60683115_Boom Power\02_Maps\Post DCO Submission\Cumulative Schemes\EYSF_PostDCO_Shortlist_Cumulative_Schemes_20240611.aprx

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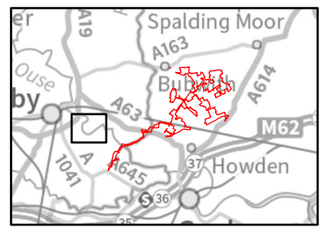
LEGEND

24 - 2021/0348/SCN: Wind Turbines at Newlands Farm
Distance from Order limits: 2919.9m
North West



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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

Application Boundaries for the shortlisted cumulative schemes
Sheet 11 of 41

FIGURE NUMBER

Appendix C

Revision: 1 Drawn: LP Checked: JW Approved: LR Date: 2024-06-17

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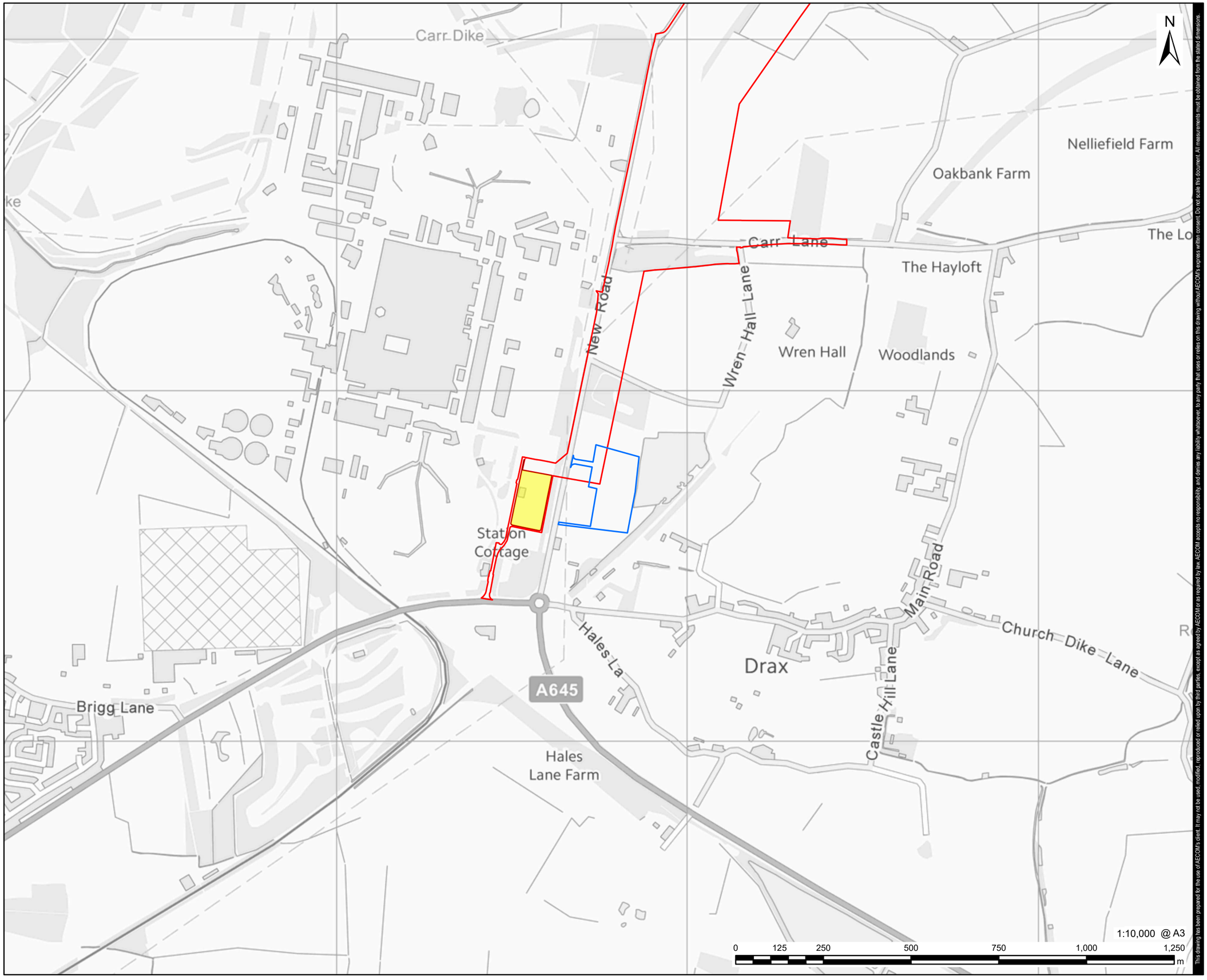

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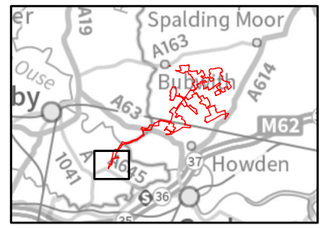
LEGEND

- Order limits
- Land not included in the Order limits
- 25 - 2020/1357/FULM: Lakeside Energy Storage
  Distance from Order limits: Intersects



NOTES

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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

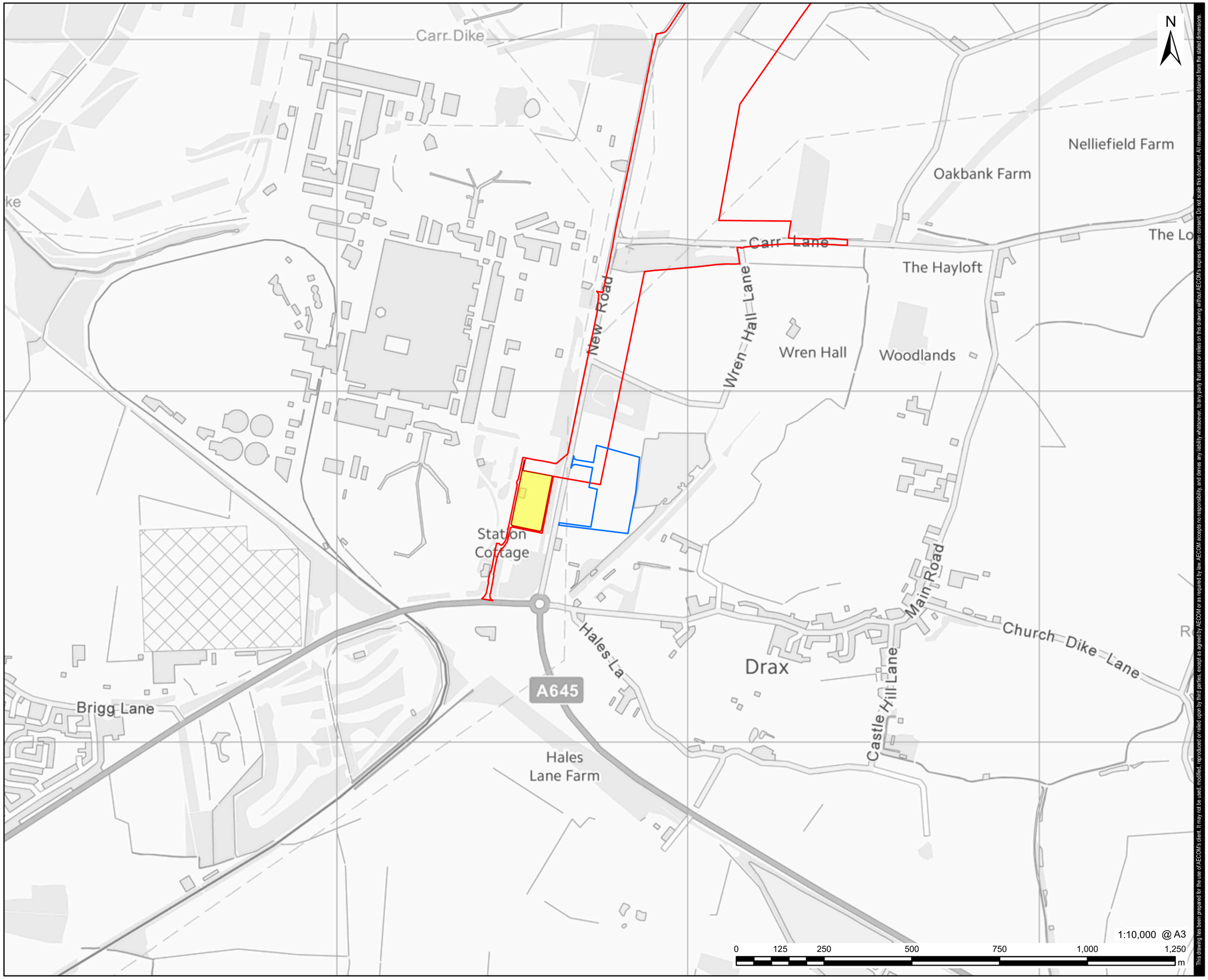
Application Boundaries for the shortlisted cumulative schemes
Sheet 12 of 41

FIGURE NUMBER

Appendix C

Revision: 1 Drawn: LP Checked: JW Approved: LR Date: 2024-06-17

Filename: I:\5004 - Information Systems\60683115_Boom Power\02_Maps\Post DCO Submission\Cumulative Schemes\EYSF_PostDCO_Shortlist_Cumulative_Schemes_20240611.aprx



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CONSULTANT

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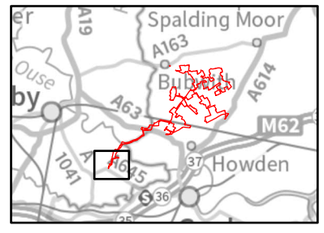
LEGEND

- Order limits
- Land not included in the Order limits
- 26 - 2022/0397/S73: Lakeside Energy Storage
  Distance from Order limits: Intersects



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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

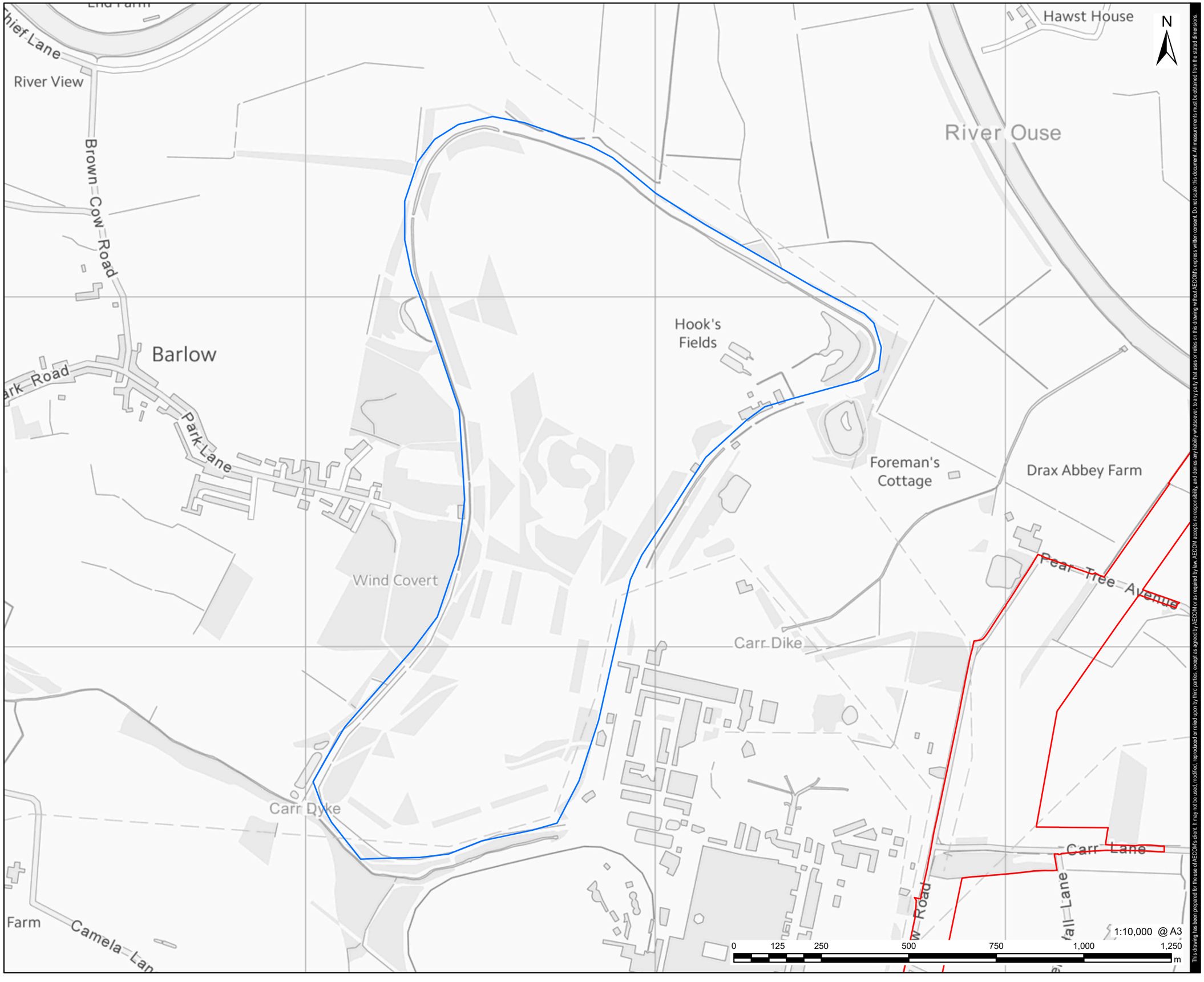
Application Boundaries for the shortlisted cumulative schemes
Sheet 13 of 41

FIGURE NUMBER

Appendix C

Revision: 1 Drawn: LP Checked: JW Approved: LR Date: 2024-06-17

Filename: I:\5004 - Information Systems\60683115_Boom Power\02_Maps\Post DCO Submission\Cumulative Schemes\EYSF_PostDCO_Shortlist_Cumulative_Schemes_20240611.aprx



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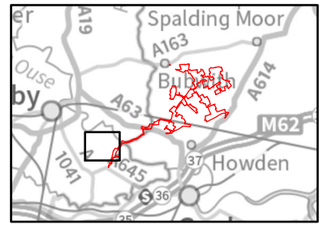
LEGEND

Order limits

27 - 2022/0107/NYSCO: Recovery of Ash at Drax Power Station
Distance from Order limits: 696.5m North West



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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

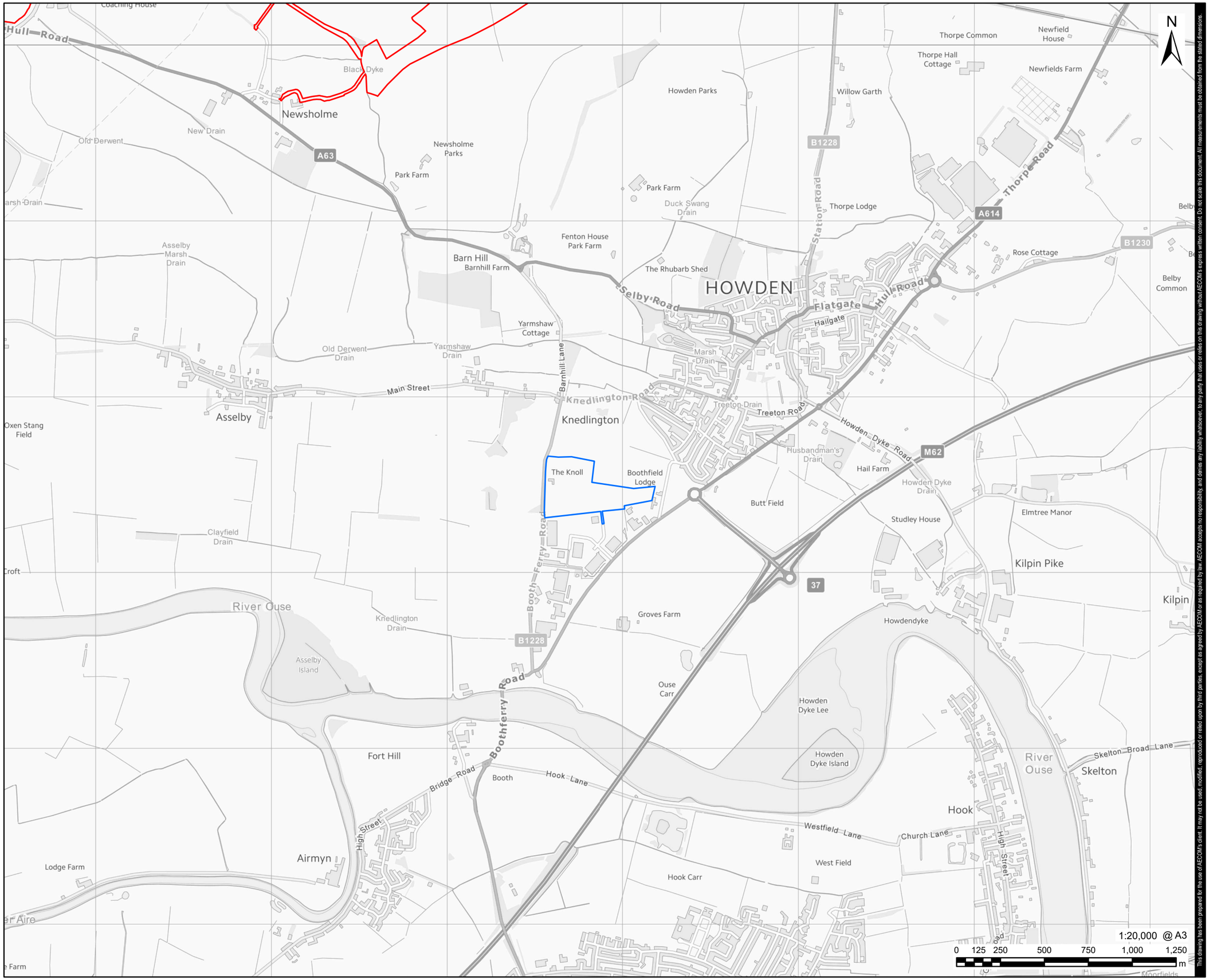
Application Boundaries for the shortlisted cumulative schemes
Sheet 14 of 41

FIGURE NUMBER

Appendix C

Revision: 1 Drawn: LP Checked: JW Approved: LR Date: 2024-06-17

Filename: \\5004 - Information Systems\60683115_Boom Power\02_Maps\Post DCO Submission\Cumulative Schemes\EYSF_PostDCO_Shortlist_Cumulative_Schemes_20240611.aprx



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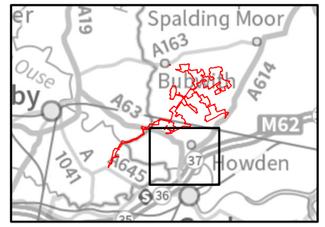
LEGEND

Order limits

28 - 22/00037/STOUT: Erection of units at Land East Of The Knoll Booth Ferry Road
Distance from Order limits: 2266.1m South



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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

Application Boundaries for the shortlisted cumulative schemes
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Appendix C

Revision: 1 Drawn: LP Checked: JW Approved: LR Date: 2024-06-17

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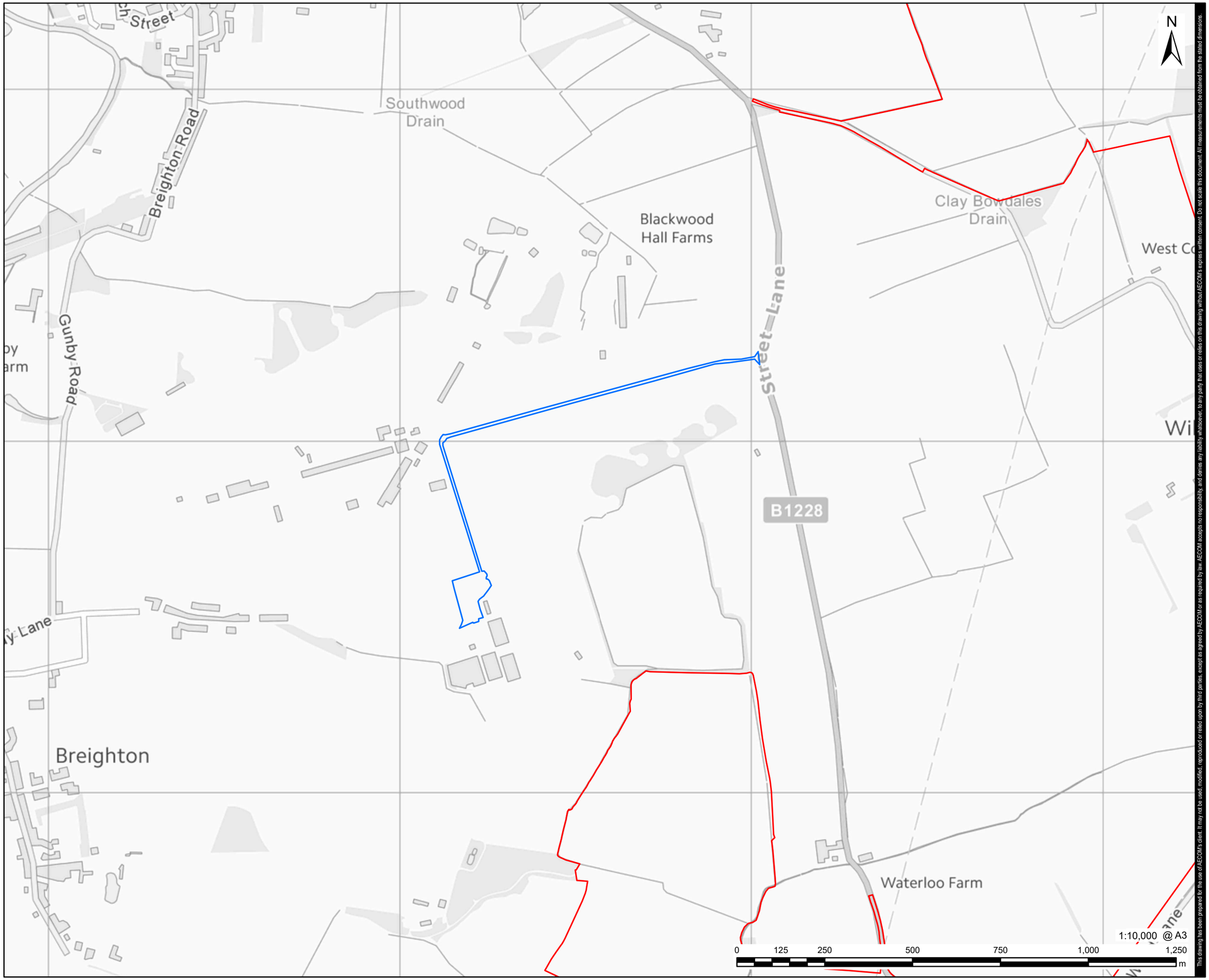

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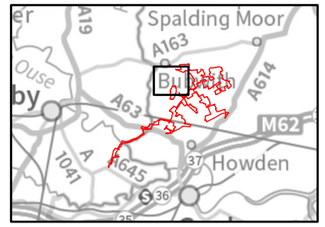
LEGEND

Order limits

29 - 22/01005/PLF: Industrial units at Land East Of The Knoll Booth Ferry Road
Distance from Order limits: 461.5m West



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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

Application Boundaries for the shortlisted cumulative schemes
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FIGURE NUMBER

Appendix C

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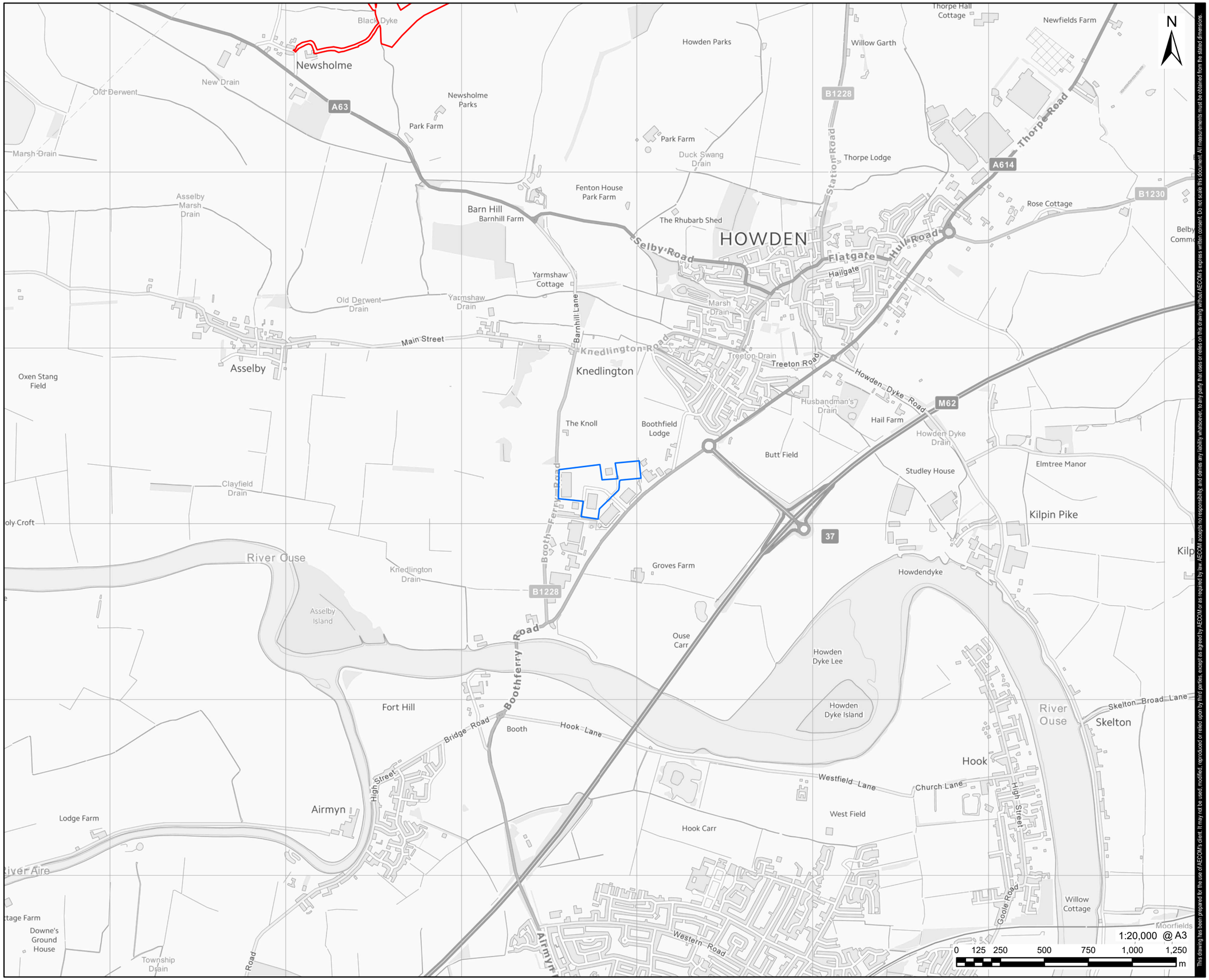

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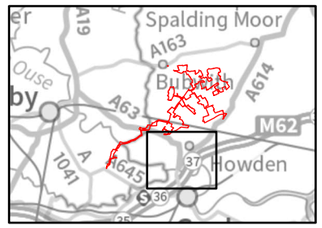
LEGEND

Order limits

32 - HOW F (East Riding of Yorkshire Local Plan)- LAND AT OZONE BUSINESS PARK 8.1HA: HOW F Employment Allocation
Distance from Order limits: 2583.5m South



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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

Application Boundaries for the shortlisted cumulative schemes
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Appendix C

Revision: 1 Drawn: LP Checked: JW Approved: LR Date: 2024-06-17

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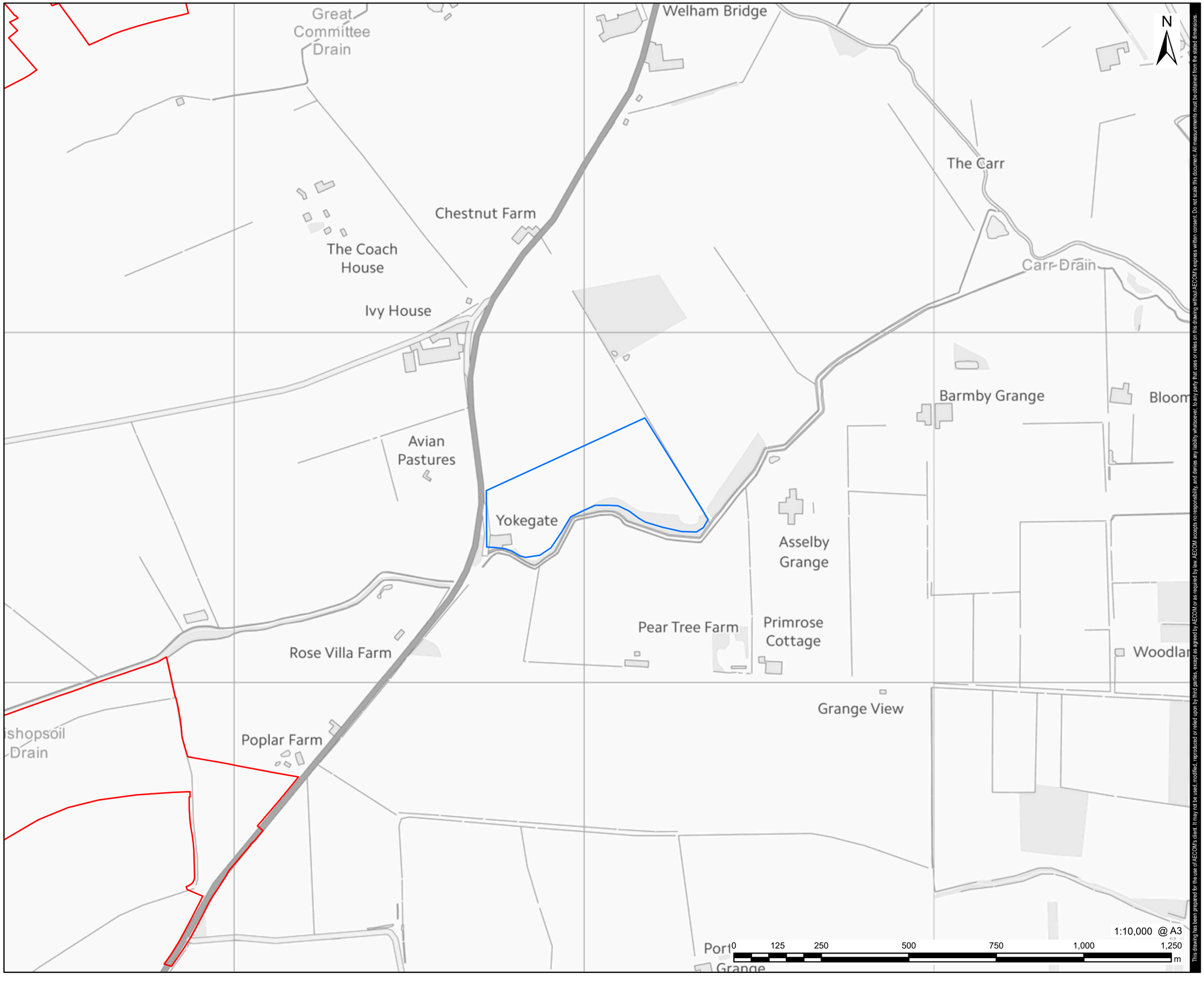

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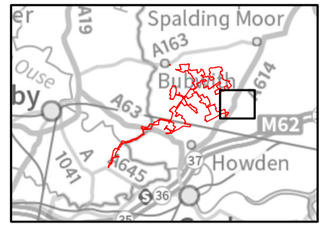
LEGEND

Order limits

48 - 19/04161/STPLF: Holiday Park at Yoke Gate Farm Holme Road
Distance from Order limits: 849m
North East



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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

Application Boundaries for the shortlisted cumulative schemes
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Appendix C

Revision: 1 Drawn: LP Checked: JW Approved: LR Date: 2024-06-17

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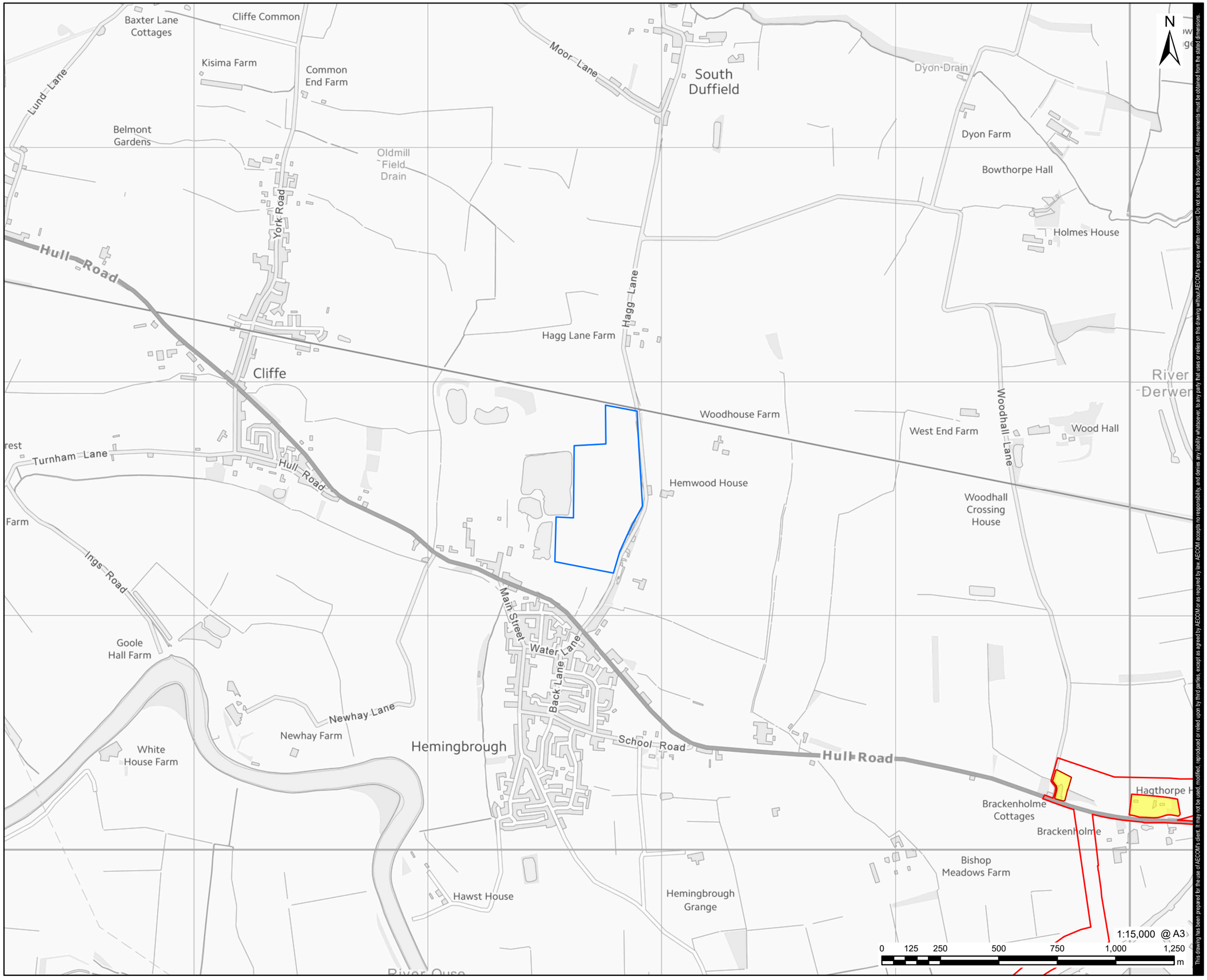

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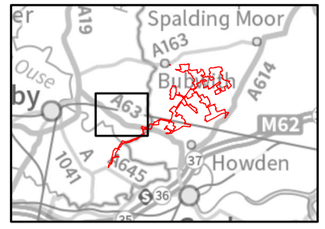
LEGEND

- Order limits
- Land not included in the Order limits
- 50 - MJP45 (Joint Minerals and Waste Plan): MJP45 Minerals Allocation
  Distance from Order limits: 2056.5m West



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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

Application Boundaries for the shortlisted cumulative schemes
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Appendix C

Revision: 1 Drawn: LP Checked: JW Approved: LR Date: 2024-06-17

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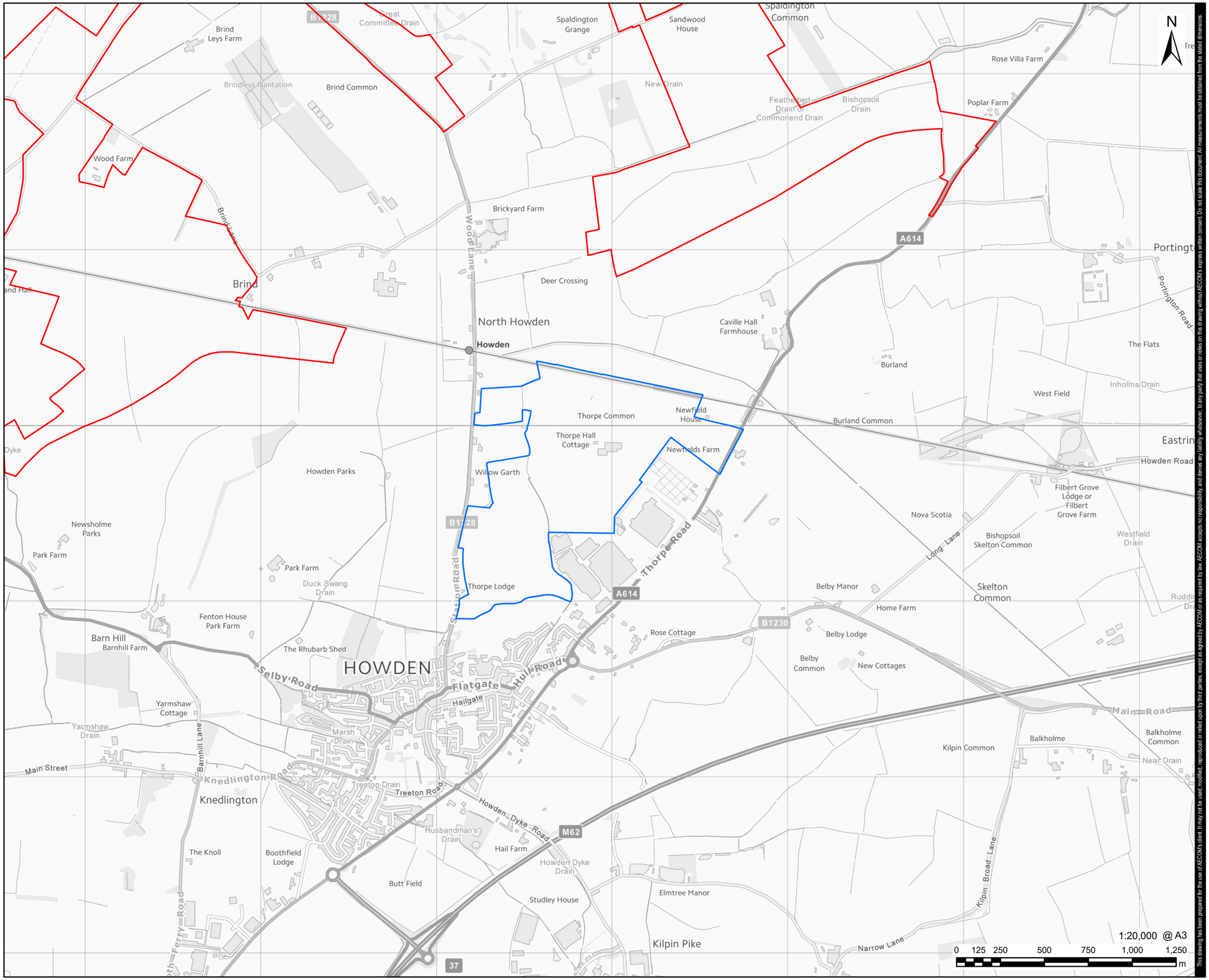

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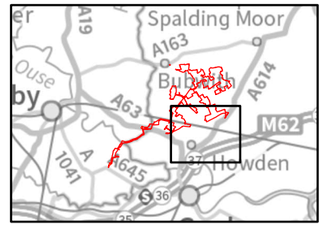
LEGEND

Order limits

51 - HOW-G- (East Riding of Yorkshire Local Plan Update)- Between Station Road and Thorpe Road: HOW-G Mixed Use Allocation Distance from Order limits: 561.7m South



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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

Application Boundaries for the shortlisted cumulative schemes
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FIGURE NUMBER

Appendix C

Revision: 1 Drawn: LP Checked: JW Approved: LR Date: 2024-06-17

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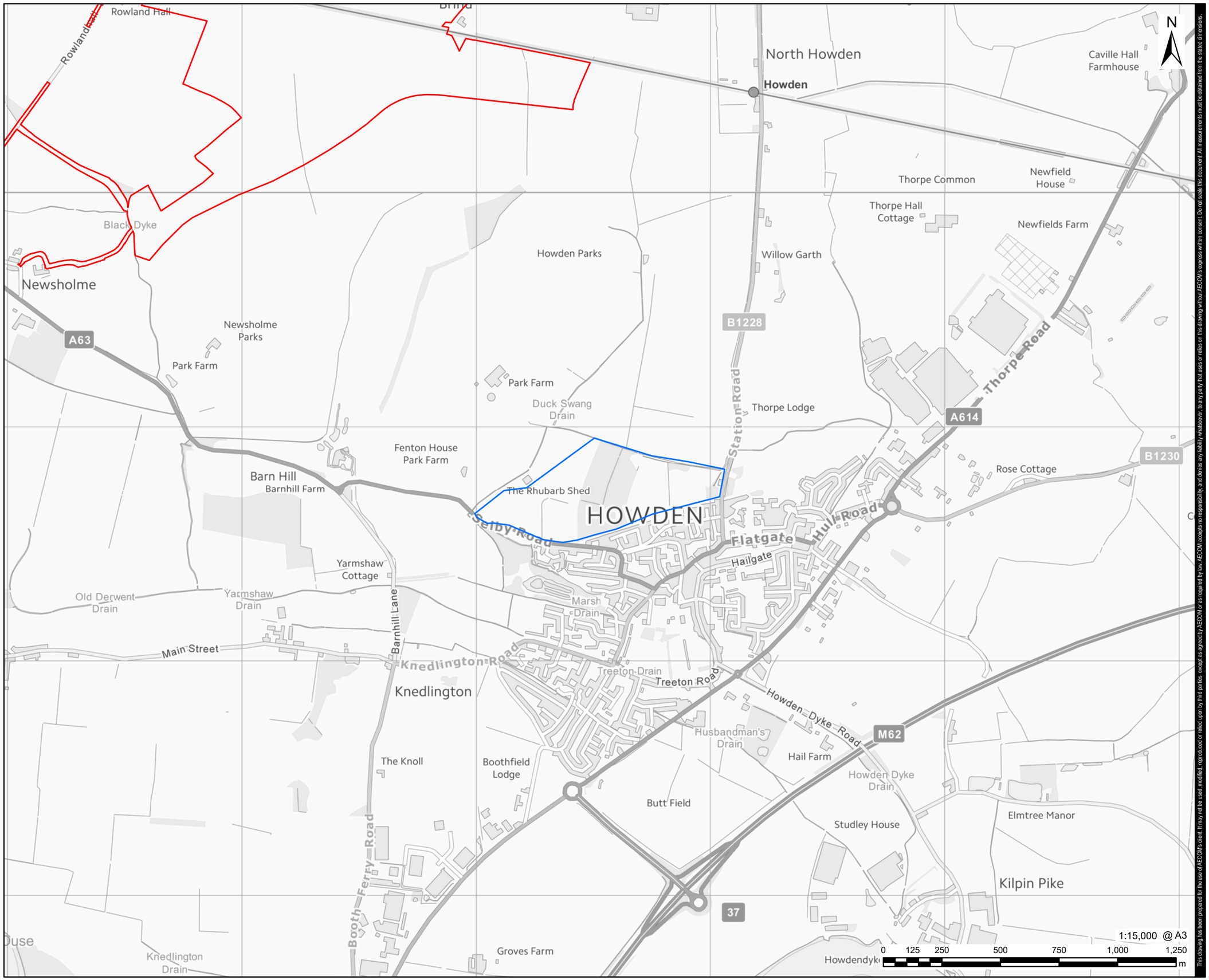

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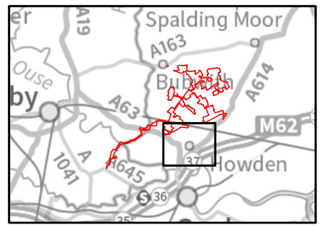
LEGEND

- Order limits
- 52 - HOW-A (East Riding of Yorkshire Local Plan Update)- North of Shelford Avenue: HOW-A Residential Allocation
  Distance from Order limits: 1405.5m South



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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

Application Boundaries for the shortlisted cumulative schemes
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Appendix C

Revision: 1 Drawn: LP Checked: JW Approved: LR Date: 2024-06-17

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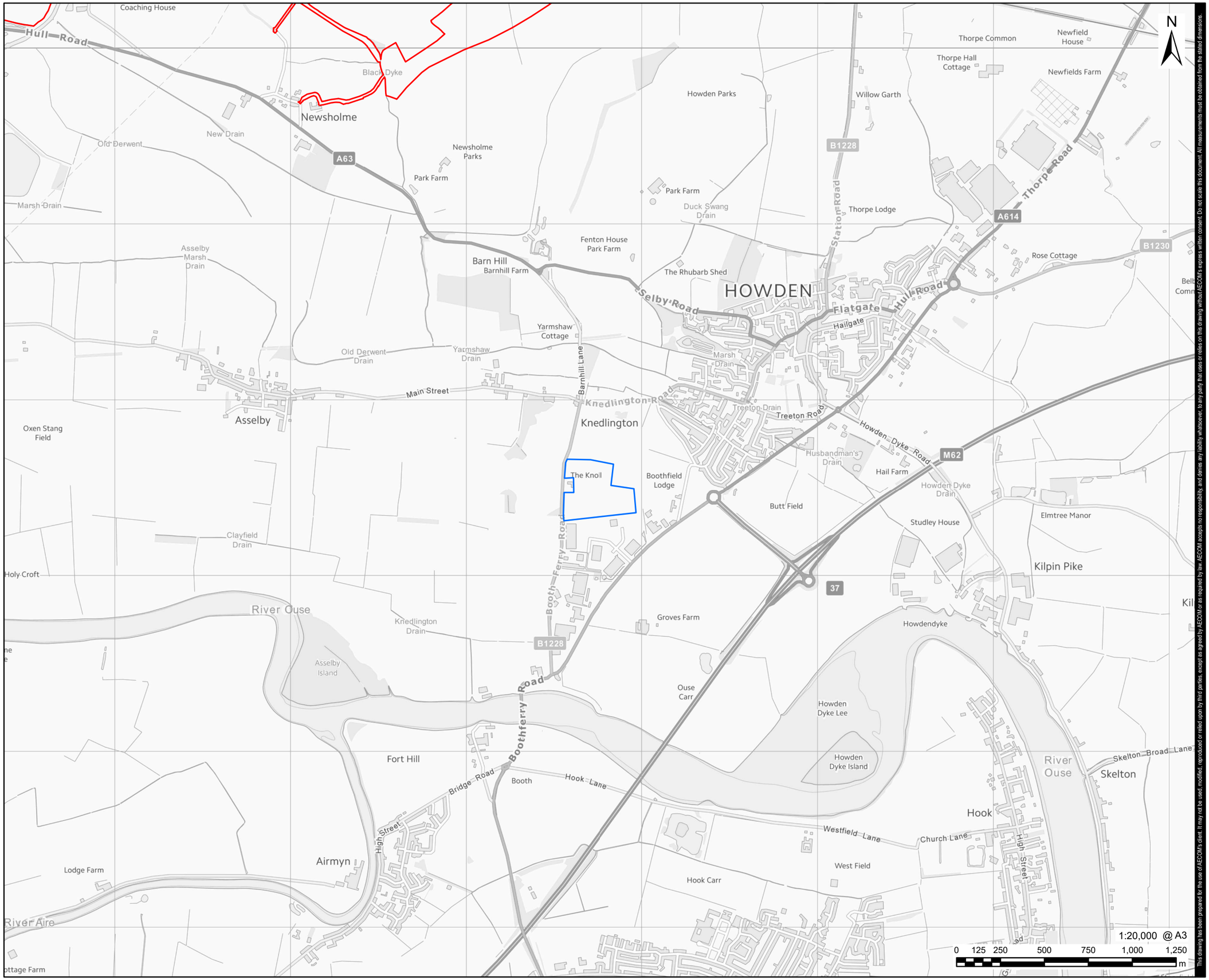

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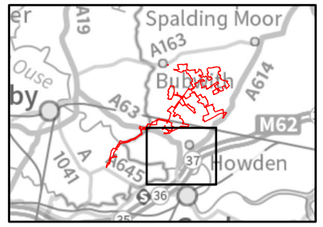
LEGEND

Order limits

53 - HOW- H (East Riding of Yorkshire Local Plan Update)- North of Ozone Business Park: HOW-H Employment allocation
Distance from Order limits: 2266.1m South



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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

Application Boundaries for the shortlisted cumulative schemes
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Appendix C

Revision: 1 Drawn: LP Checked: JW Approved: LR Date: 2024-06-17

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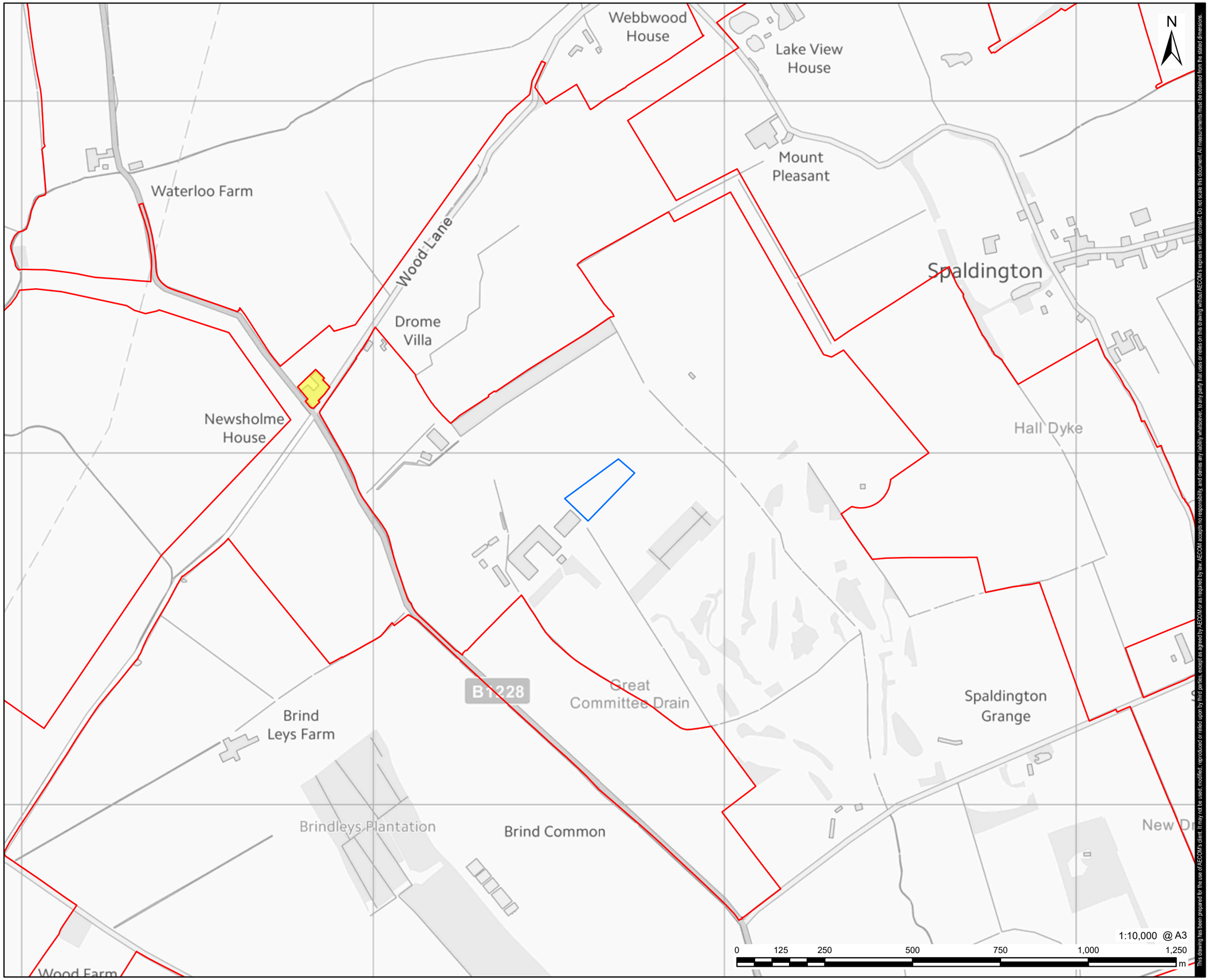

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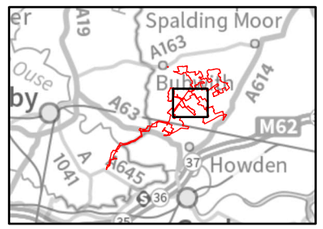
LEGEND

- Order limits
- Land not included in the Order limits
- 61 - 22/03606/CM: Anaerobic Digestion Plant at Spaldington Airfield Distance from Order limits: 283.3m North East



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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

Application Boundaries for the shortlisted cumulative schemes
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Appendix C

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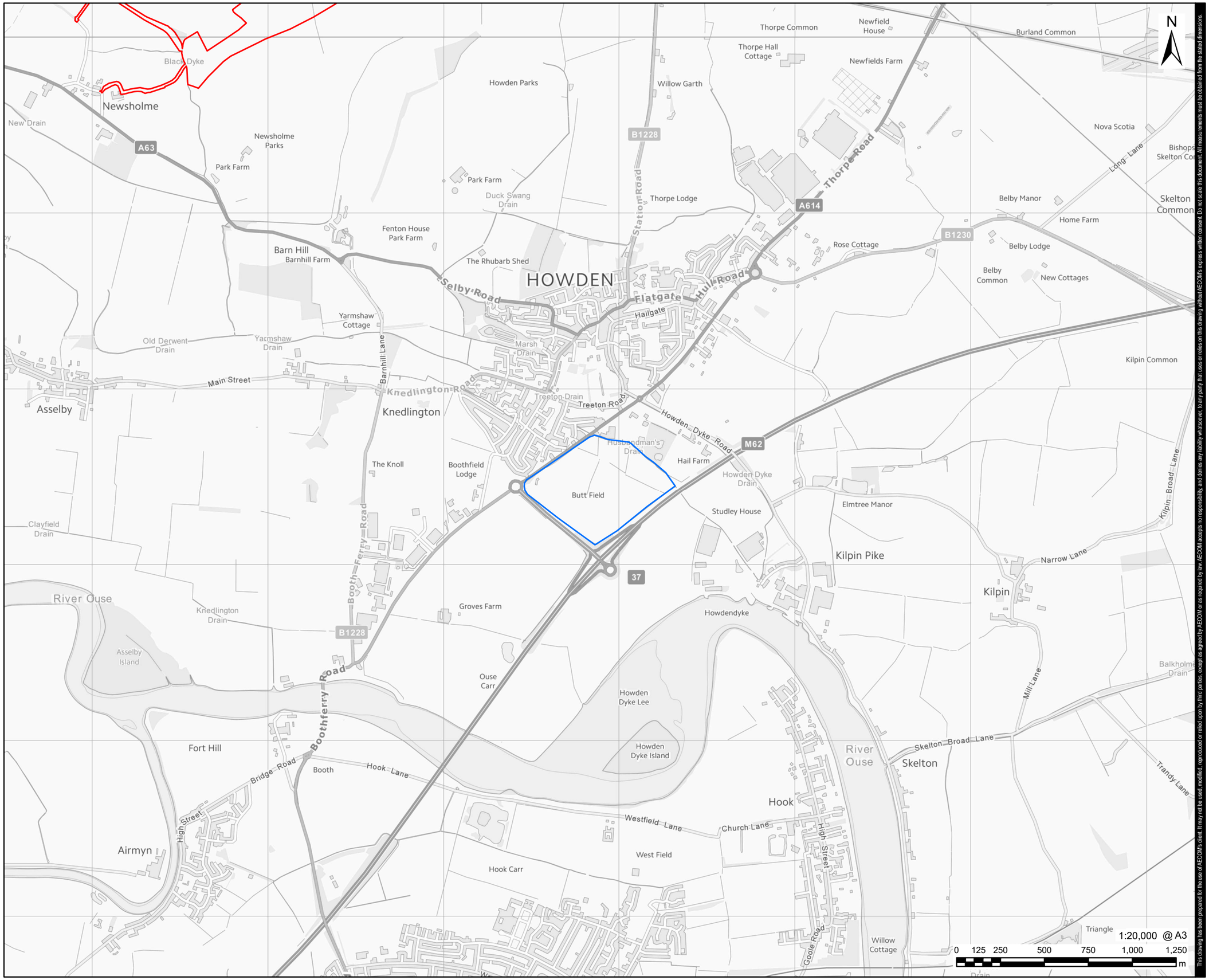

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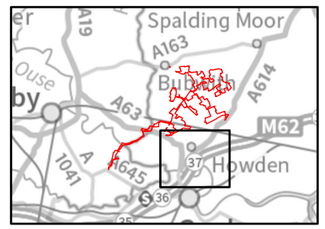
LEGEND

Order limits

62 - 22/03575/EIASCO: Warehousing at Land South East Of Boothferry Lodge
Distance from Order limits: 2655.4m South



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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

Application Boundaries for the shortlisted cumulative schemes
Sheet 24 of 41

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Appendix C

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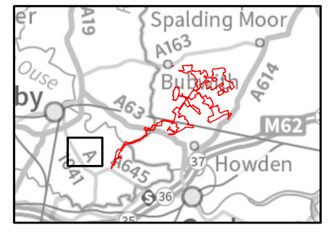
LEGEND

64 - 2022/1257/FULM: Battery Energy Storage System at Home Farm Barlow Road
Distance from Order Limits: 2857.3m West



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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

Application Boundaries for the shortlisted cumulative schemes
Sheet 25 of 41

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Appendix C

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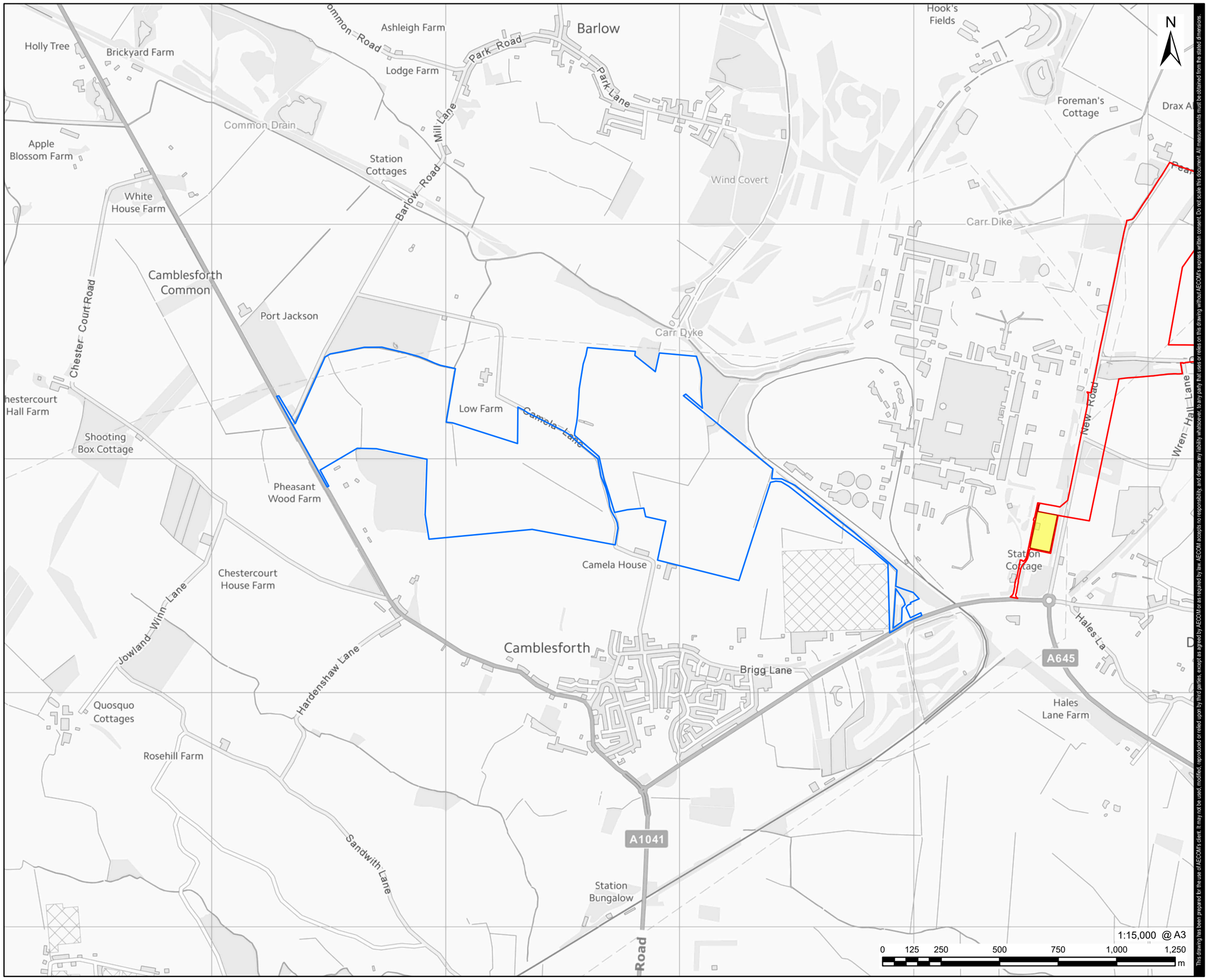

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Alencon Link
Basingstoke, RG21 7PP
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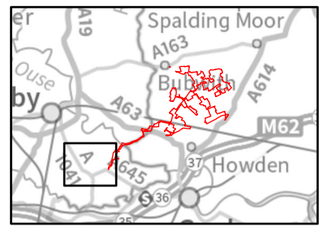
LEGEND

- Order limits
- Land not included in the Order limits
- 65 - 2021/0788/EIA: Solar Farm at Land North And South Of Camela Lane
  Distance from Order limits: 386.5m West



NOTES

Application references EN070006 and 21/01448/EIASCO only show the scoping boundary not development boundary.

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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

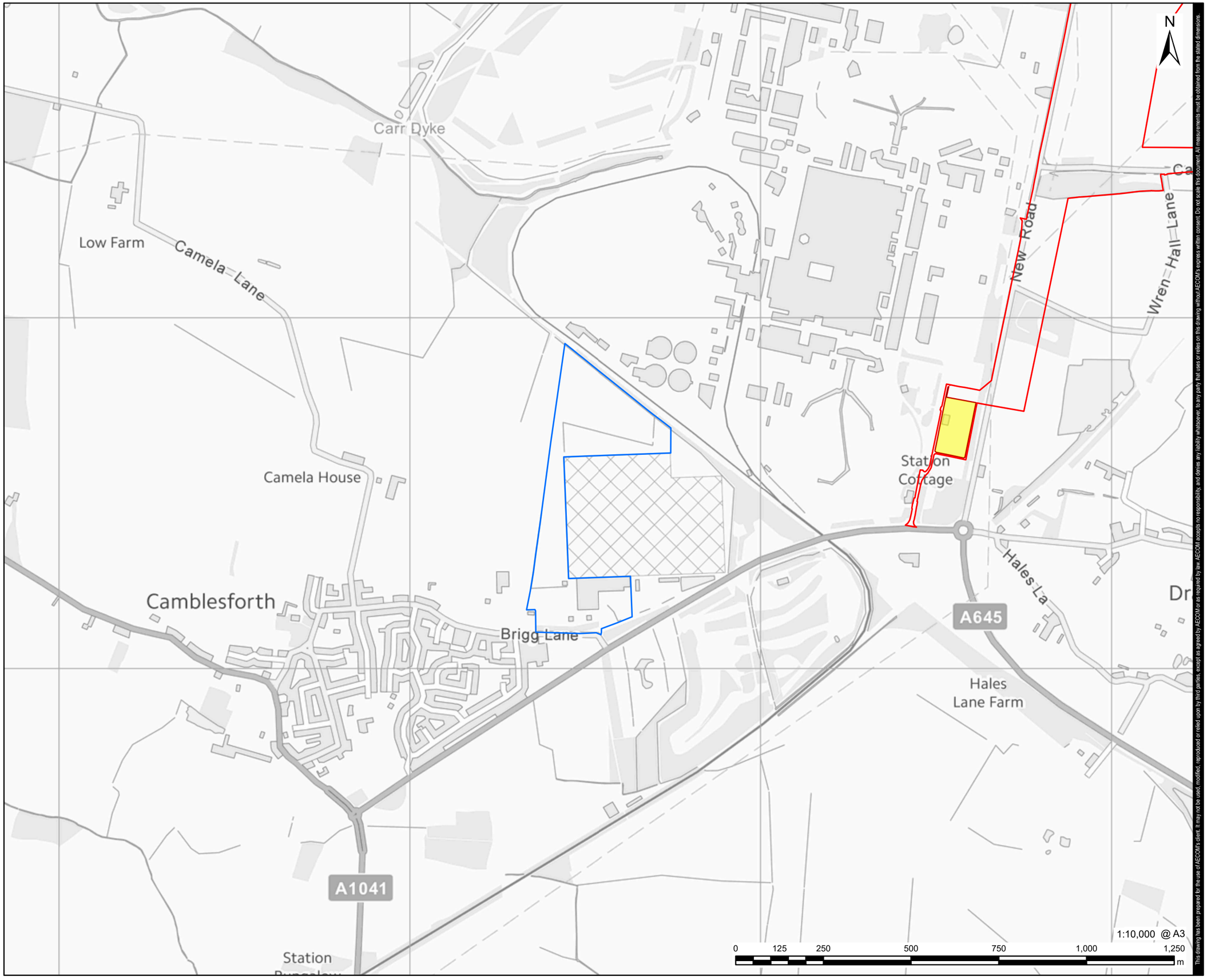
Application Boundaries for the shortlisted cumulative schemes
Sheet 26 of 41

FIGURE NUMBER

Appendix C

Revision: 1 Drawn: LP Checked: JW Approved: LR Date: 2024-06-17

Filename: I:\60004 - Information Systems\60683115_Boom Power\02_Maps\Post DCO Submission\Cumulative Schemes\EYSF_PostDCO_Shortlist_Cumulative_Schemes_20240611.aprx_20240611.aprx



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LEGEND

- Order limits
- Land not included in the Order limits
- 66 - 2022/0358/FULM : Horticultural Facility at Brigg Lane
  Distance from Order limits: 699.8m West

NOTES

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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

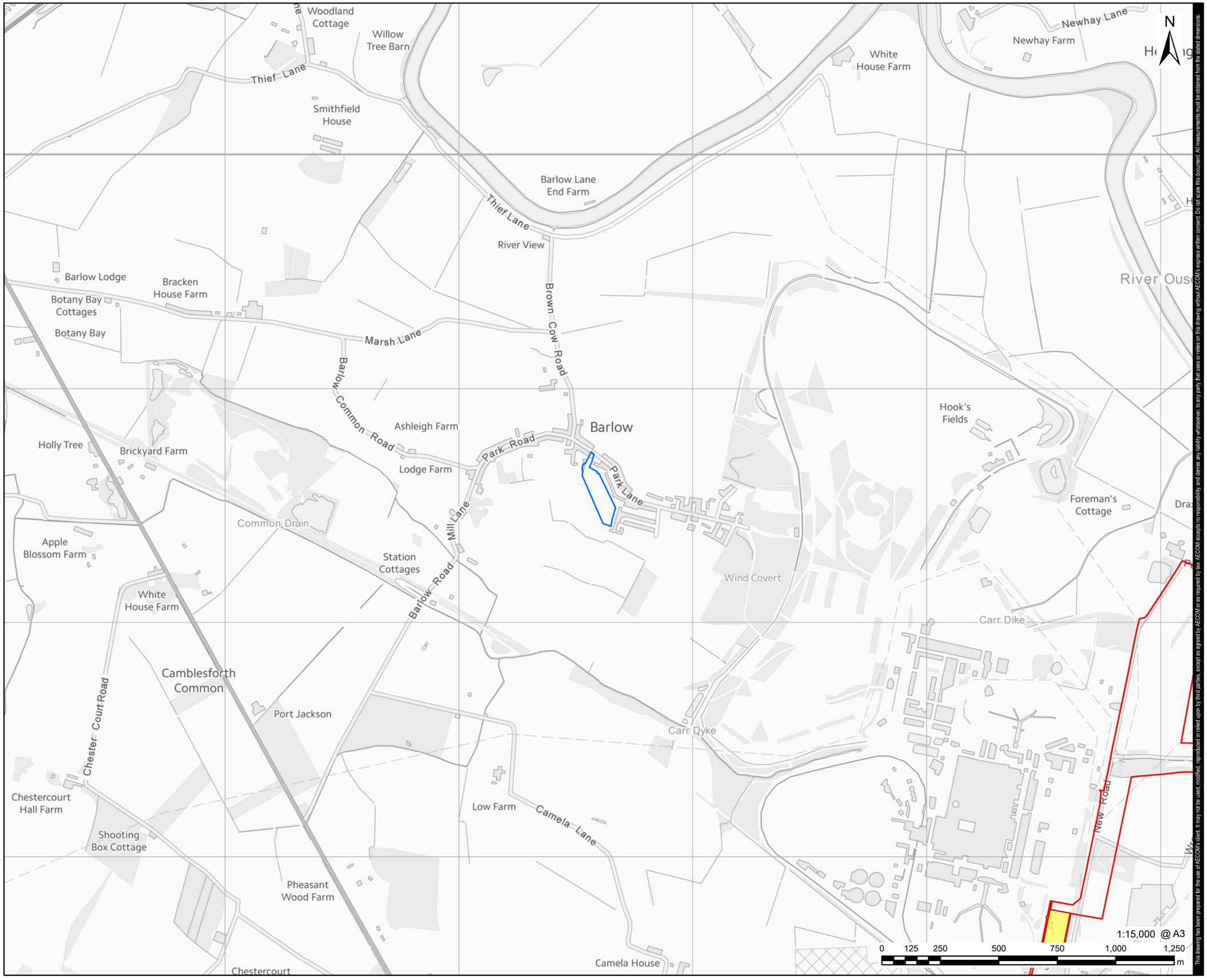
Application Boundaries for the shortlisted cumulative schemes
Sheet 27 of 41

FIGURE NUMBER

Appendix C

Revision: 1 Drawn: LP Checked: JW Approved: LR Date: 2024-06-17

Filename: I:\5004 - Information Systems\60683115_Boom Power\02_Mapsi\Post DCO Submission\Cumulative Schemes\EYSF_PostDCO_Shortlist_Cumulative_Schemes_20240611.aprx



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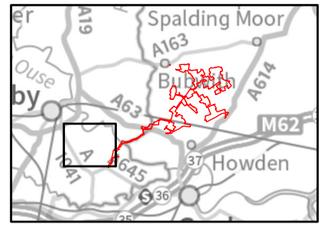
LEGEND

- Order limits
- Land not included in the Order limits
- 67 - 2018/1122/REMM: Residential development at Morello Garth Park Lane
  Distance from Order limits: 2288.5m West



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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

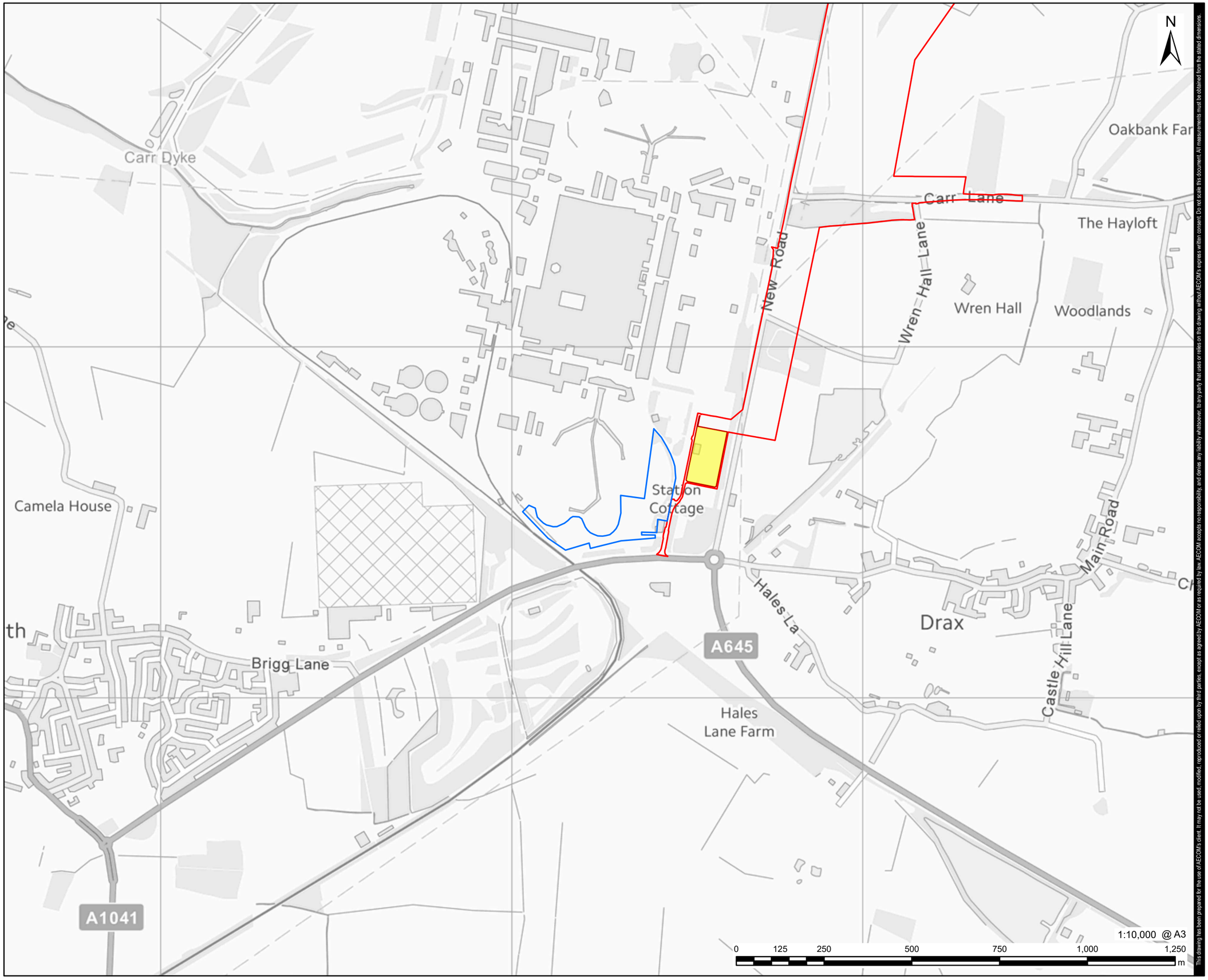
Application Boundaries for the shortlisted cumulative schemes
Sheet 28 of 41

FIGURE NUMBER

Appendix C

Revision: 1 Drawn: LP Checked: JW Approved: LR Date: 2024-06-17

Filename: I:\5004 - Information Systems\60683115_Boom Power\02_Maps\Post DCO Submission\Cumulative Schemes\EYSF_PostDCO_Shortlist_Cumulative_Schemes_20240611.aprx



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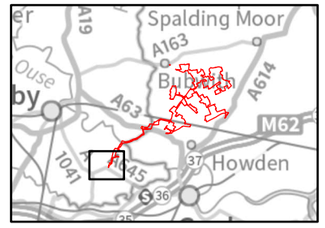
LEGEND

- Order limits
- Land not included in the Order limits
- 68 - 2020/0561/FULM: Constructors Village within Drax Power station Distance from Order limits: Abuts



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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

Application Boundaries for the shortlisted cumulative schemes
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Appendix C

Revision: 1 Drawn: LP Checked: JW Approved: LR Date: 2024-06-17

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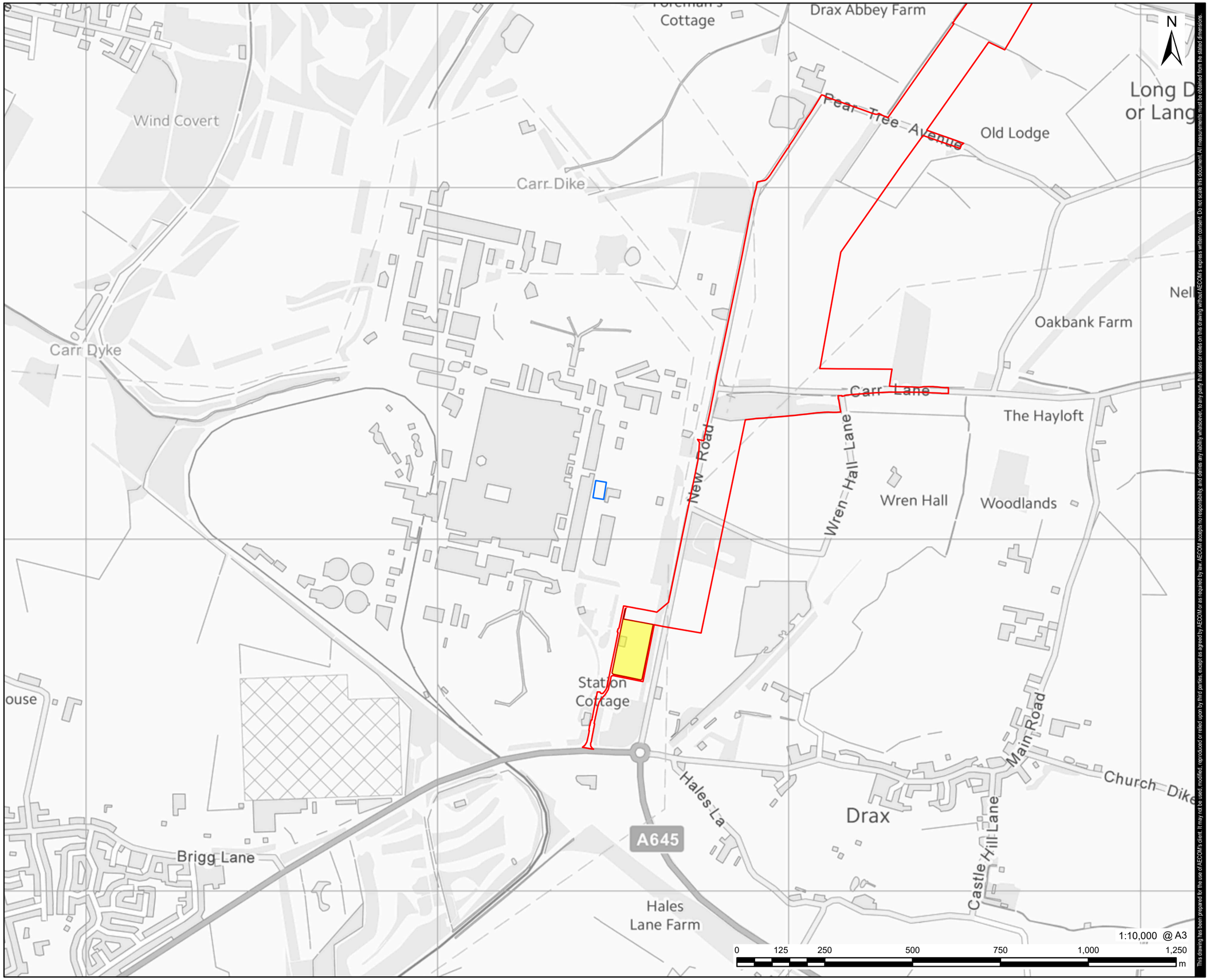

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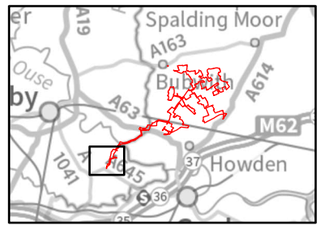
LEGEND

- Order limits
- Land not included in the Order limits
- 69 - 2020/0462/DEM: Bulk Storage Tanks at Drax Power Station Distance from Order limits: 240.1m West



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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

Application Boundaries for the shortlisted cumulative schemes
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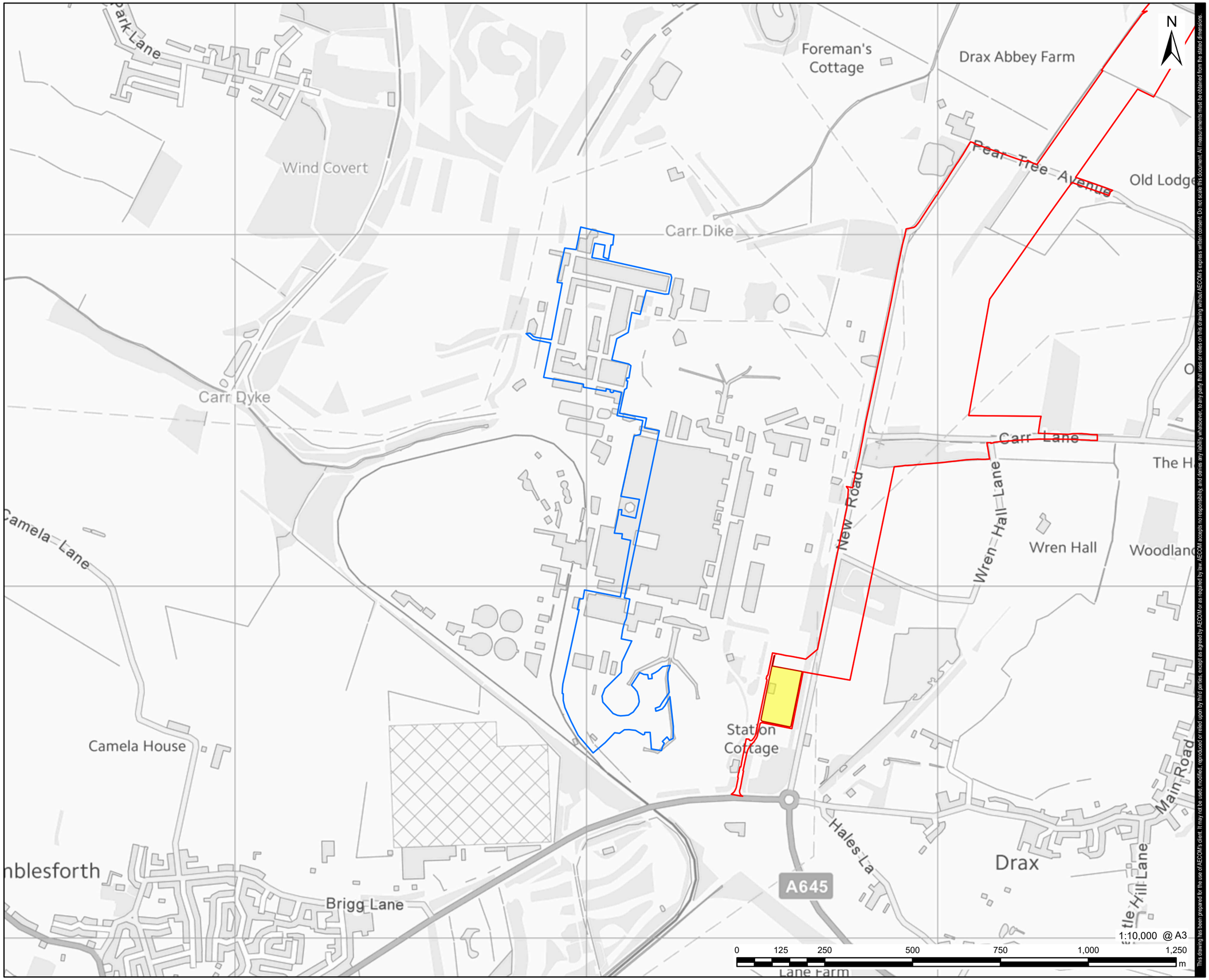
Appendix C

Revision: 1 Drawn: LP Checked: JW Approved: LR Date: 2024-06-17

Filename: I:\15004 - Information Systems\60683115_Boom Power\02_Maps\Post DCO Submission\Cumulative Schemes\EYSF_PostDCO_Shortlist_Cumulative_Schemes_20240611.aprx



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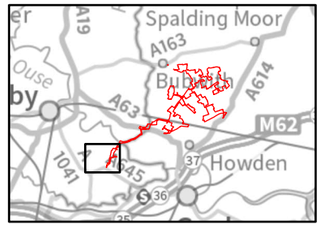
LEGEND

- Order limits
- Land not included in the Order limits
- 70 - 2020/0994/FULM : FGT Plant Distance from Order limits: 204.5m West



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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

Application Boundaries for the shortlisted cumulative schemes
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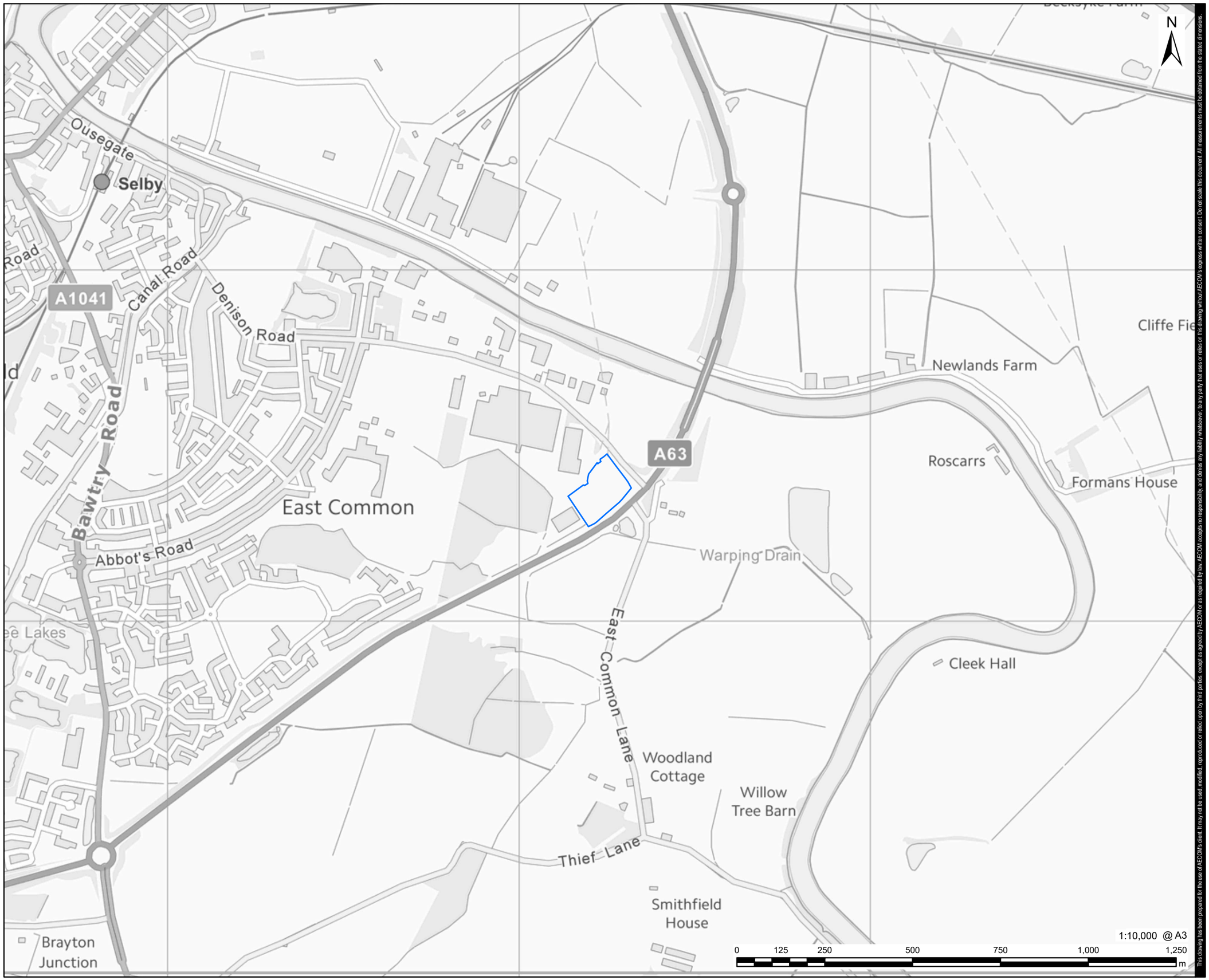

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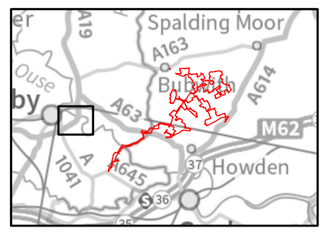
LEGEND

72 - 2019/0345/FULM: FGT Plant Distance from Order limits: 4893.1m North West



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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

Application Boundaries for the shortlisted cumulative schemes
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Appendix C

Revision: 1 Drawn: LP Checked: JW Approved: LR Date: 2024-06-17

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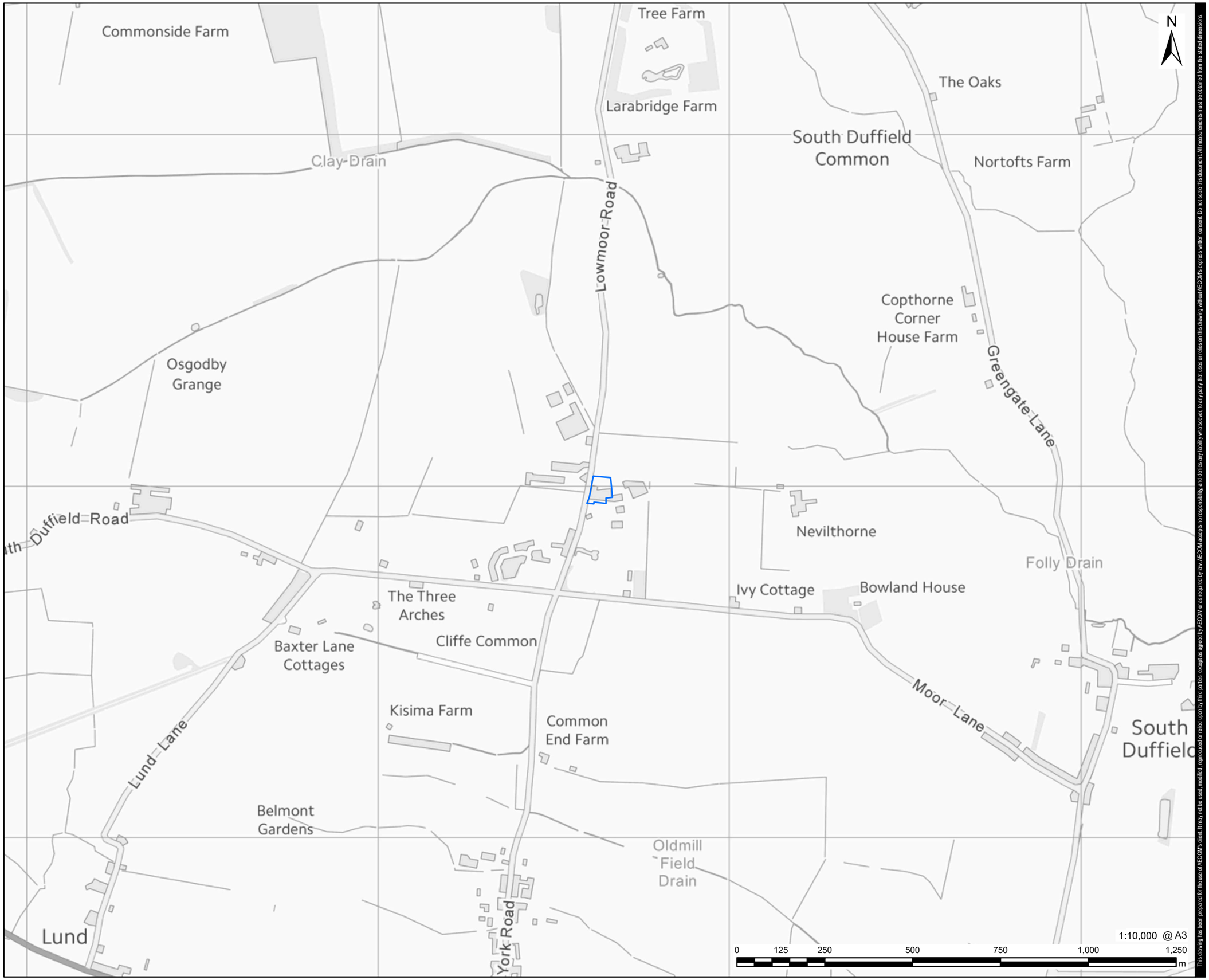

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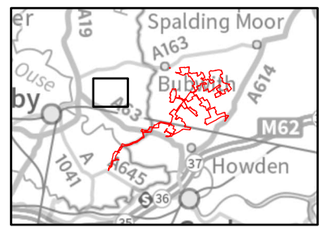
LEGEND

73 - 2021/0400/FULM: New Warhouse Building
Distance from Order limits: 4682.9m North West



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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

Application Boundaries for the shortlisted cumulative schemes
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Appendix C

Revision: 1 Drawn: LP Checked: JW Approved: LR Date: 2024-06-17

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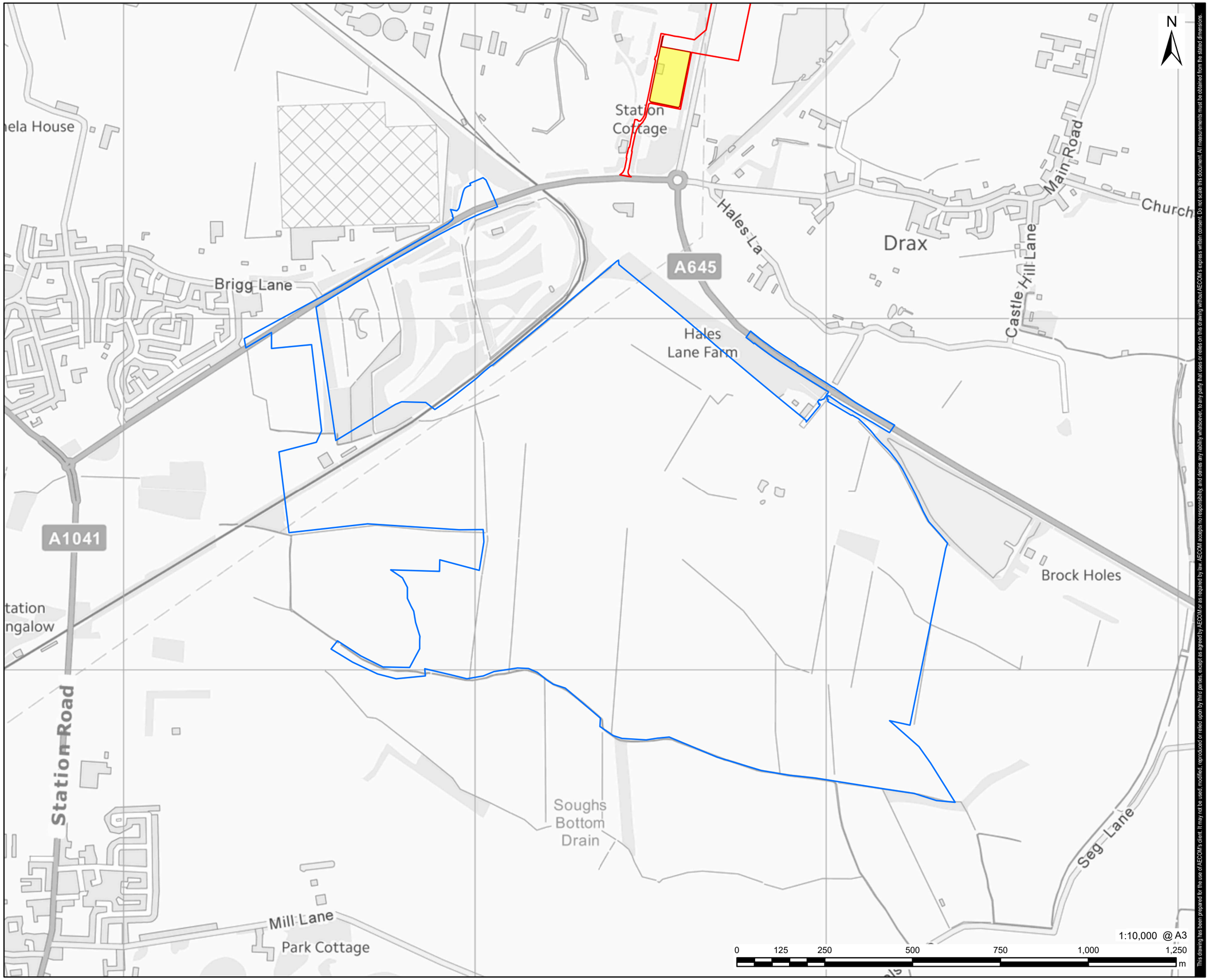

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East Yorkshire Solar Farm

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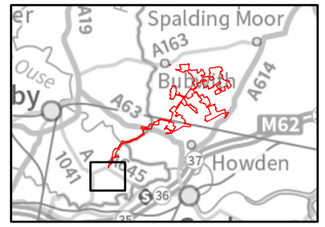
LEGEND

- Order limits
- Land not included in the Order limits
- 74 - 2023/0128/EIA: Solar Farm at Land South Of A645 Distance from Order limits: 239.7m South



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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

Application Boundaries for the shortlisted cumulative schemes
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Appendix C

Revision: 1 Drawn: LP Checked: JW Approved: LR Date: 2024-06-17

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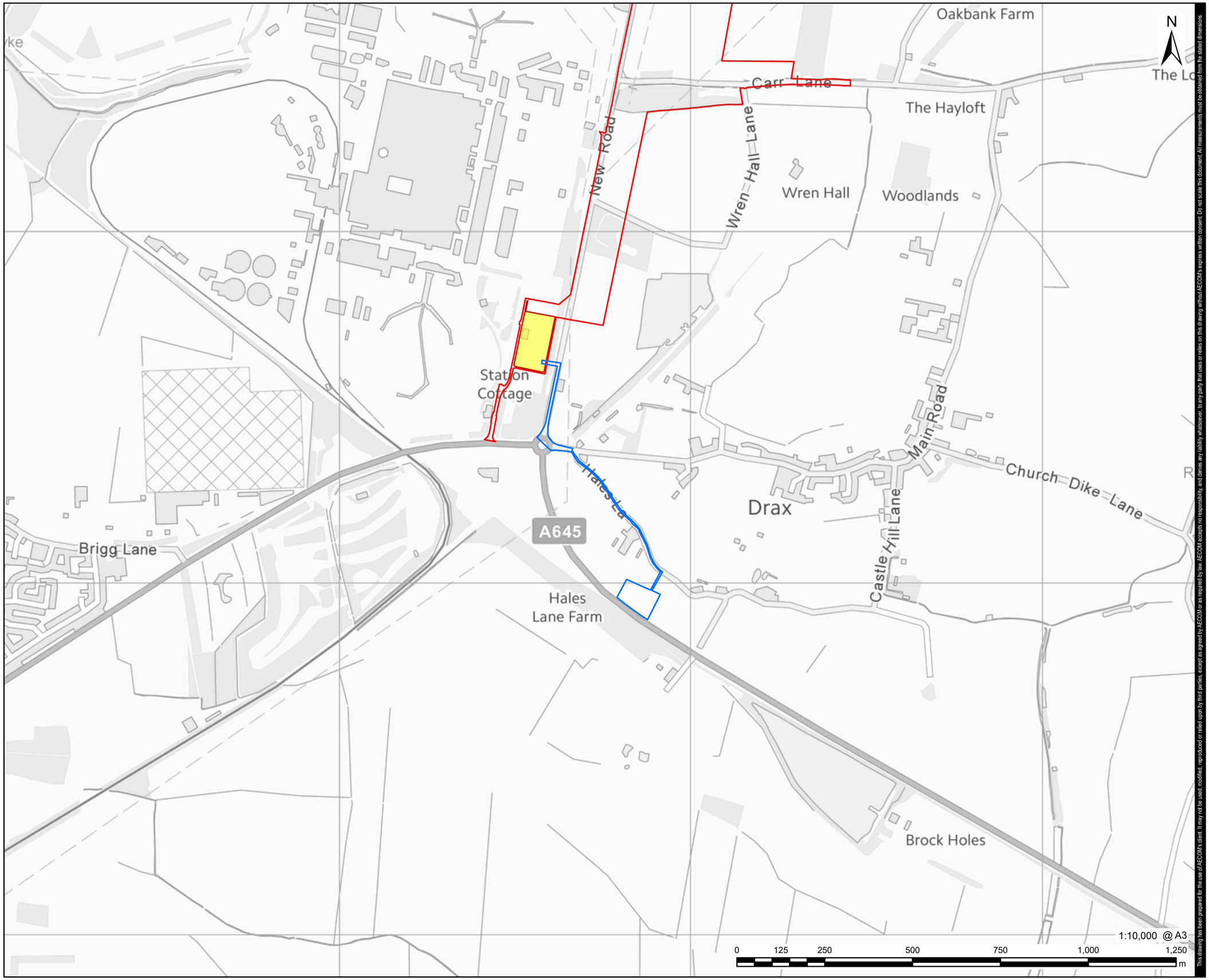

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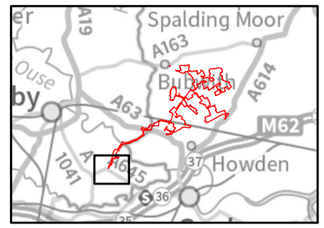
LEGEND

- Order limits
- Land not included in the Order limits
- 75 - 2021/1089/FULM : Battery Storage Facility at Land Off Hales Lane
  Distance from Order limits: Intersects



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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

Application Boundaries for the shortlisted cumulative schemes
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Revision: 1 Drawn: LP Checked: JW Approved: LR Date: 2024-06-17

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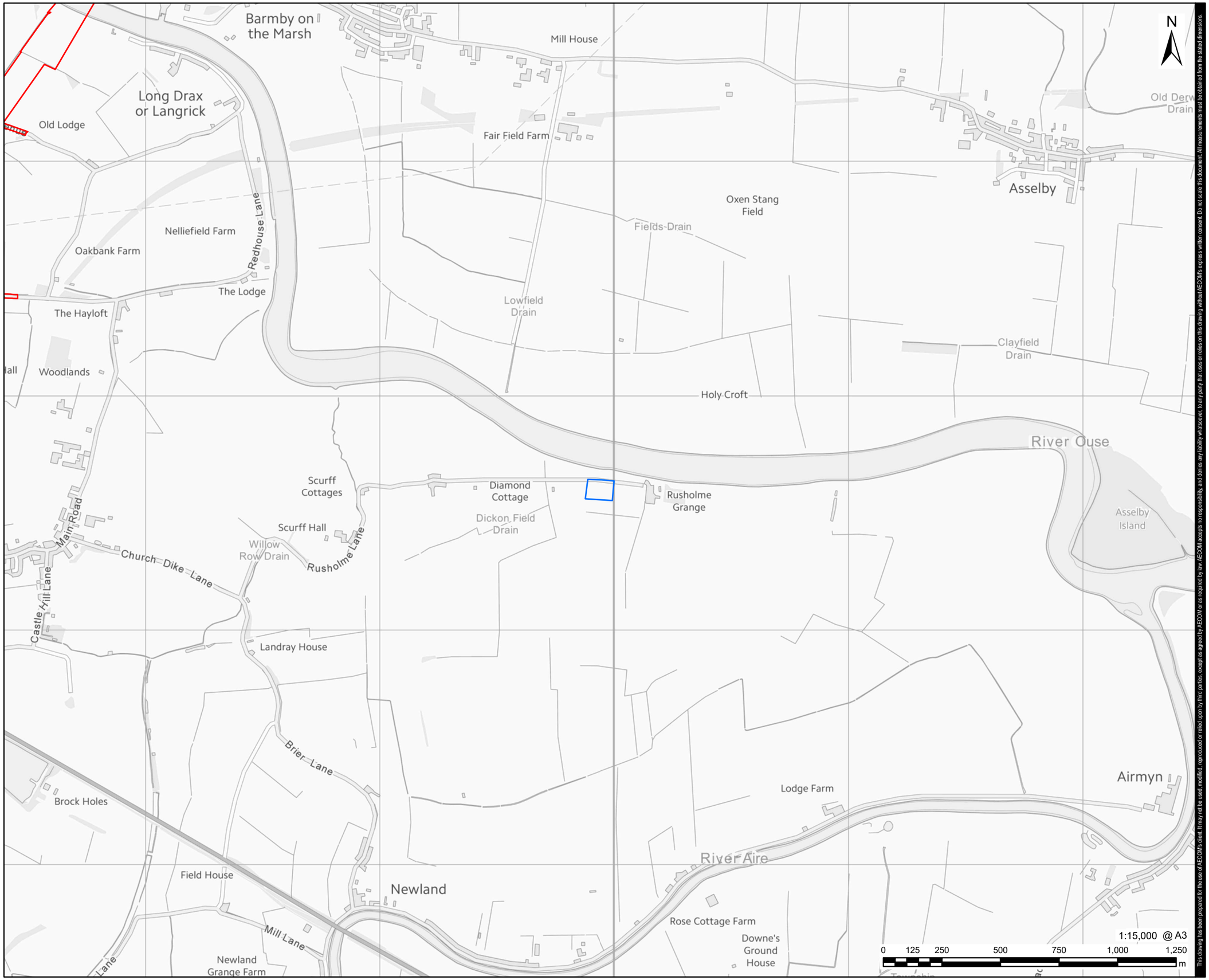

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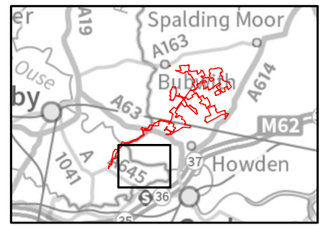
LEGEND

Order limits

76 - 2022/0494/S73: Battery Energy Storage System
Distance from Order limits: 2553.2m East



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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

Application Boundaries for the shortlisted cumulative schemes
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Appendix C

Revision: 1 Drawn: LP Checked: JW Approved: LR Date: 2024-06-17

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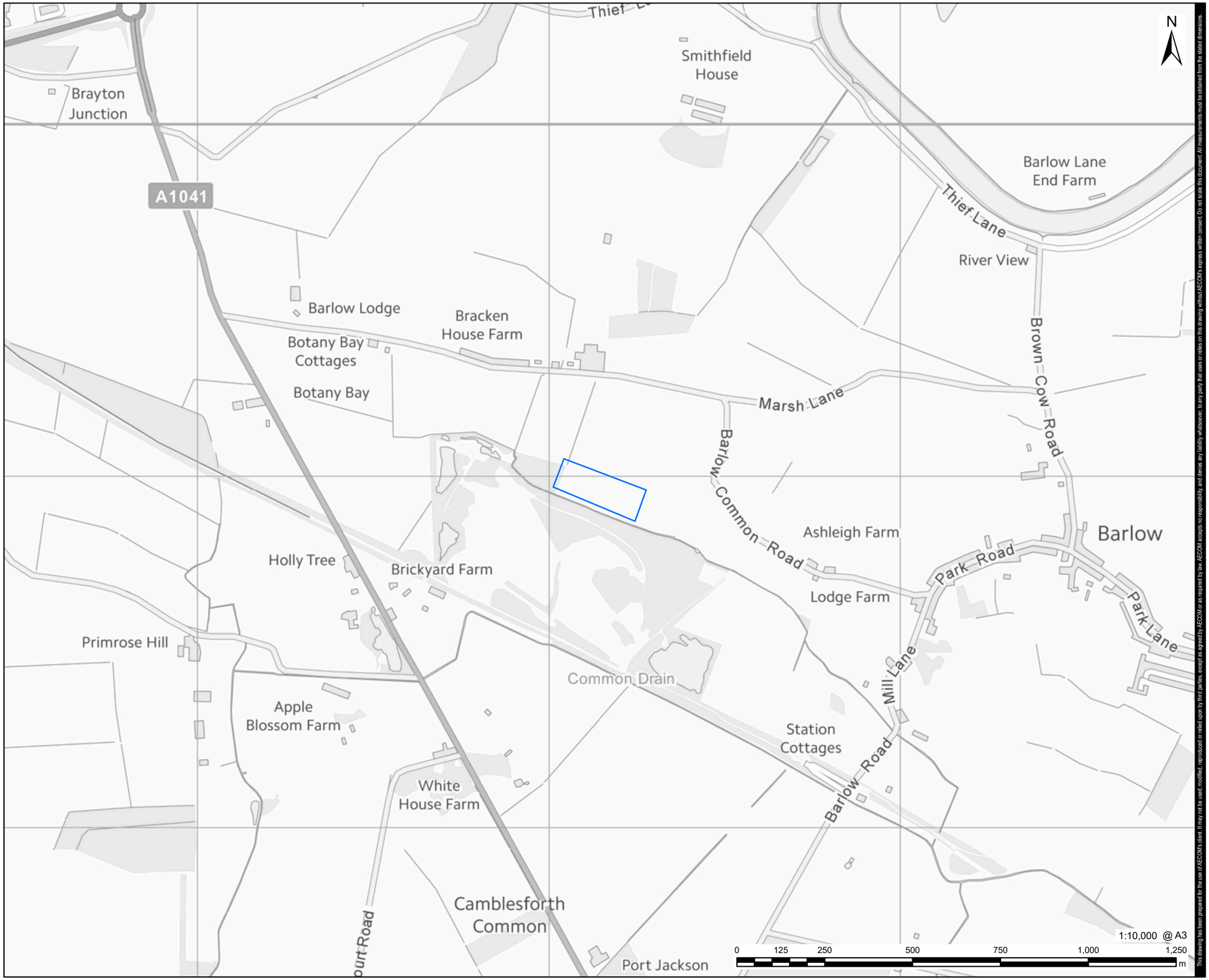

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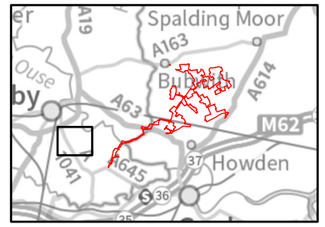
LEGEND

77 - 2022/0287/SCN: Scoping Opinion for Battery Storage at land off Barlow Common Road
Distance from Order limits: 3753.2m
West



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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

Application Boundaries for the shortlisted cumulative schemes
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Appendix C

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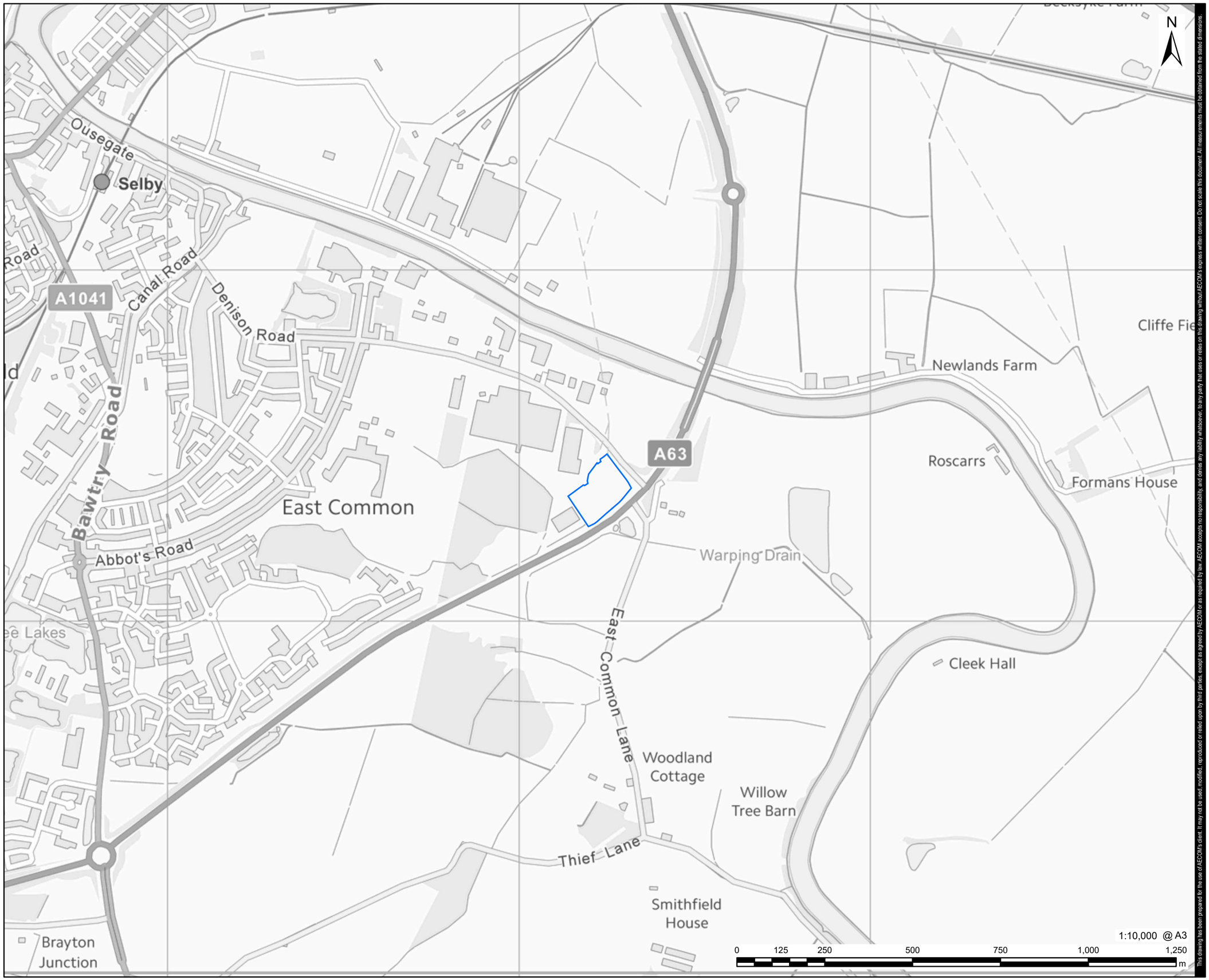

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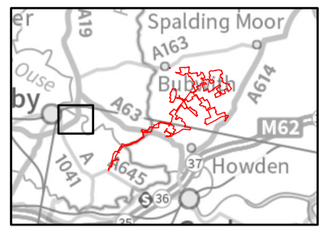
LEGEND

78 - 2022/0153/FULM: HGV Park and Welfare Buildings at Sedamyl UK Ltd plan
Distance from Order limits: 4893.1m North West



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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

Application Boundaries for the shortlisted cumulative schemes
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Appendix C

Revision: 1 Drawn: LP Checked: JW Approved: LR Date: 2024-06-17

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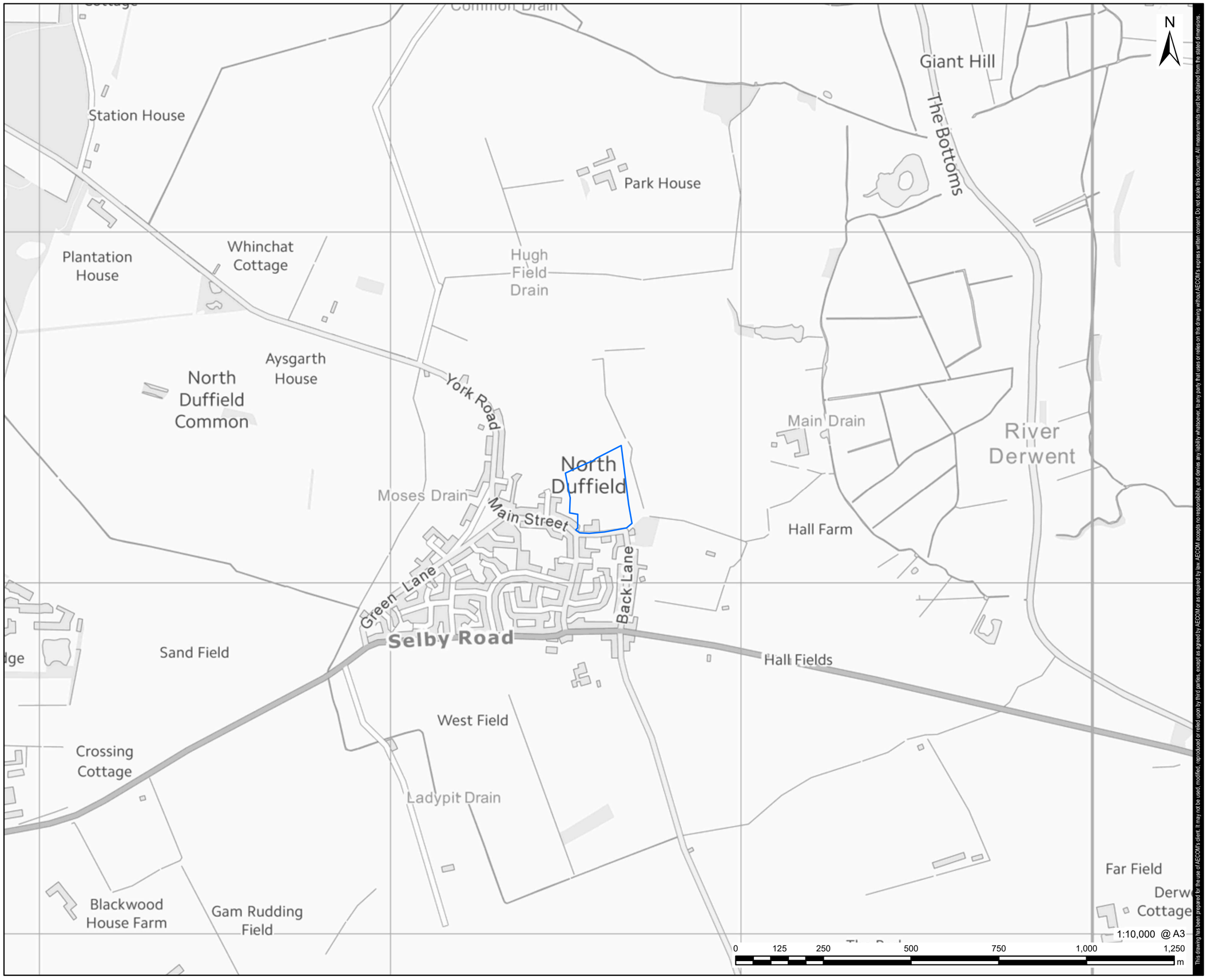

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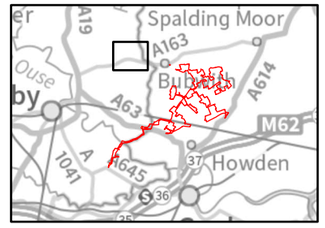
LEGEND

80 - NDUF-O(Selby District Local Plan Publication Version)- Land north of Gothic Farm, Back Lane: NDUF F- Housing Allocation Distance from Order limits: 3799m West



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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

Application Boundaries for the shortlisted cumulative schemes
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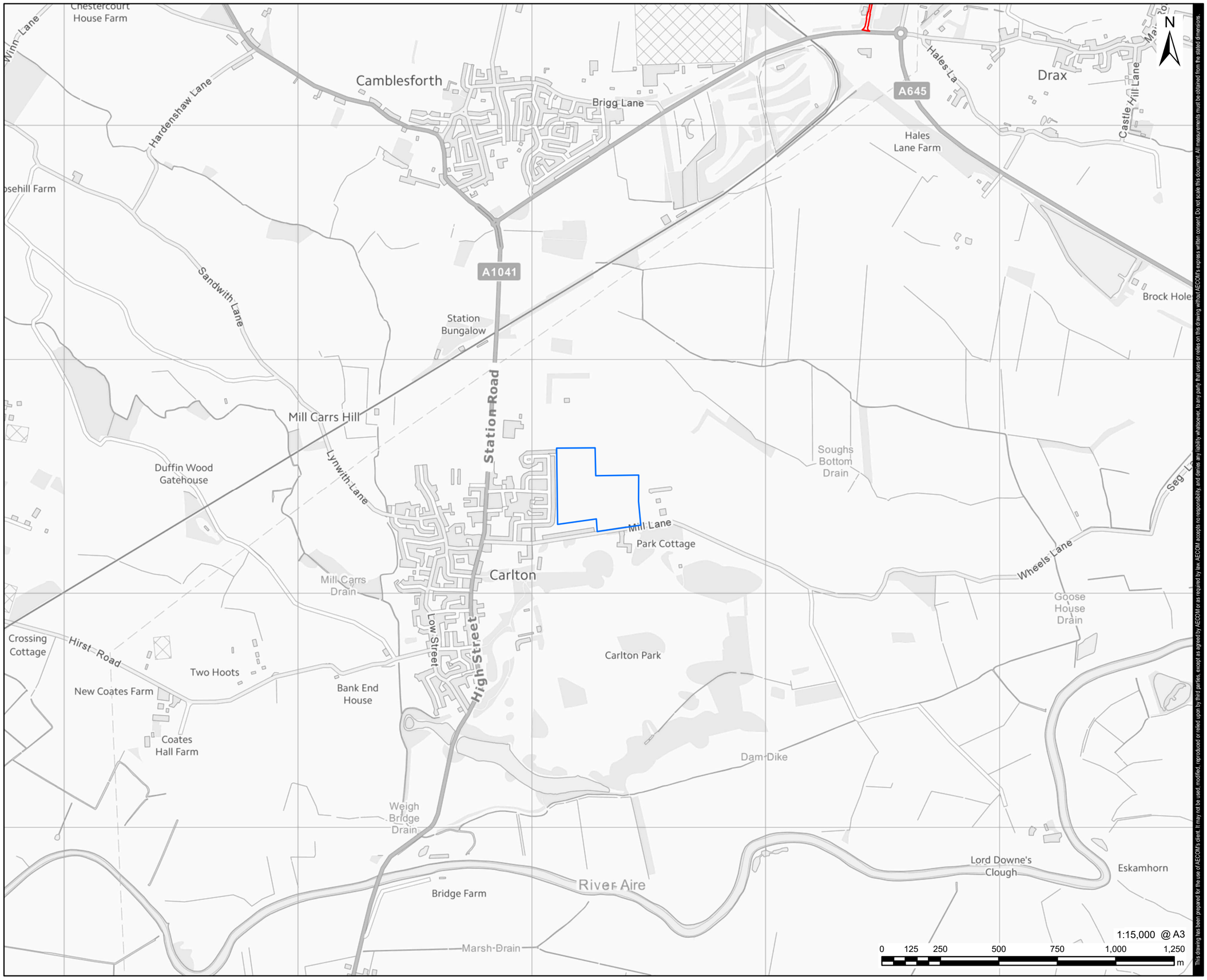
Revision: 1 Drawn: LP Checked: JW Approved: LR Date: 2024-06-17

Filename: \\5004 - Information Systems\60683115_Boom Power\02_Maps\Post DCO Submission\Cumulative Schemes\EYSF_PostDCO_Shortlist_Cumulative_Schemes_20240611.aprx



AECOM

PROJECT

East Yorkshire Solar Farm

CLIENT

East Yorkshire Solar Farm Limited

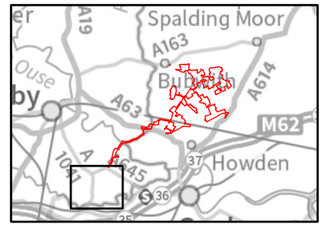
CONSULTANT

AECOM Limited
Midpoint,
Alencon Link
Basingstoke, RG21 7PP
www.aecom.com

LEGEND

Order limits

81 - CARL-G (Selby District Local Plan Publication Version)- Land north of Mill Lane: CARL-G - Housing Allocation
Distance from Order limits: 2120.3m South West



NOTES

Application references EN070006 and 21/01448/EIASCO only show the scoping boundary not development boundary.

Development boundaries are indicative only and digitised by AECOM from publicly available documents from the Planning Inspectorate, East Riding of Yorkshire Council, and North Yorkshire Council. Some boundaries are only partially shown to indicate overlap with the Order limits.

ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

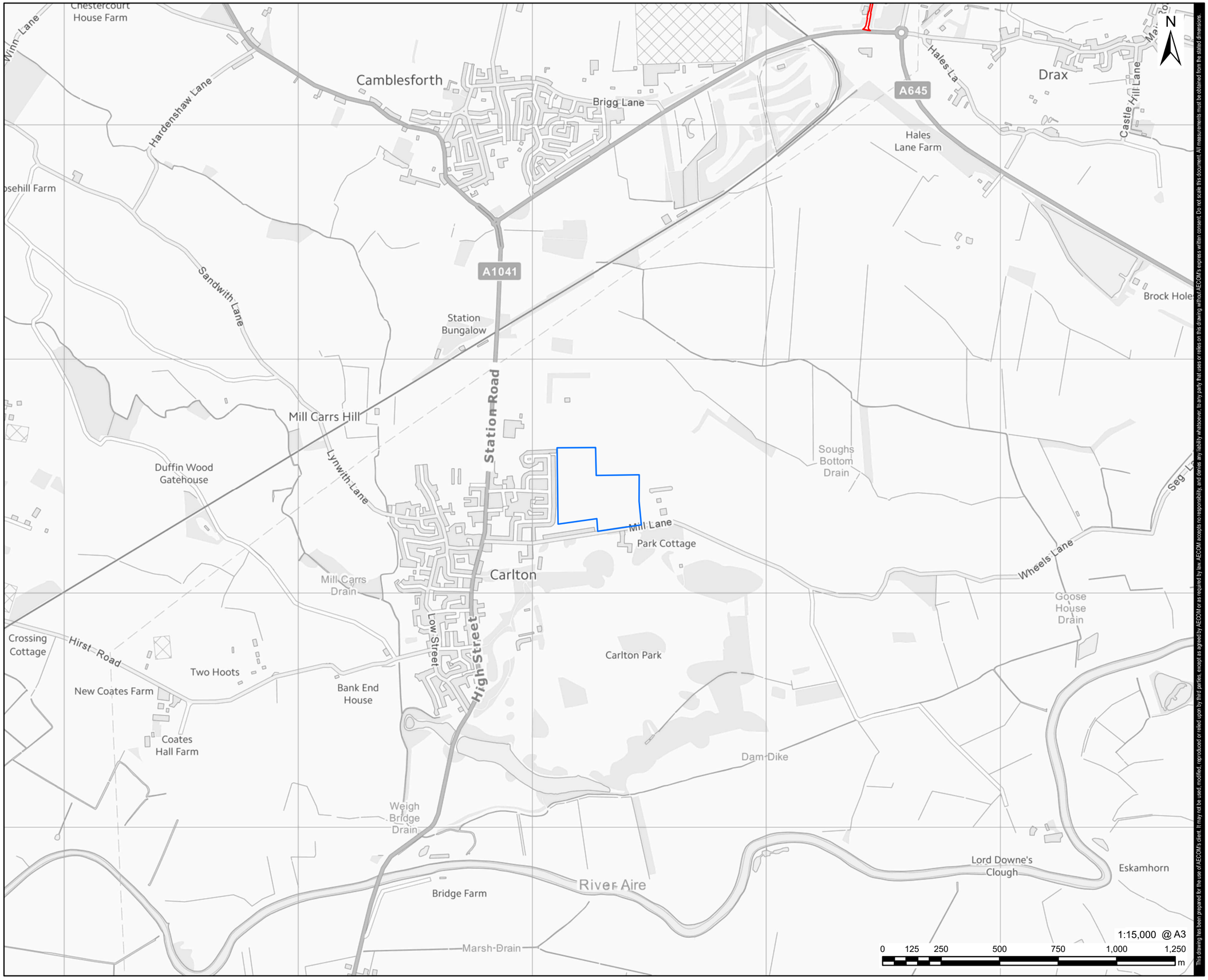
Application Boundaries for the shortlisted cumulative schemes
Sheet 40 of 41

FIGURE NUMBER

Appendix C

Revision: 1 Drawn: LP Checked: JW Approved: LR Date: 2024-06-17

Filename: \\5004 - Information Systems\60683115_Boom Power\02_Maps\Post DCO Submission\Cumulative Schemes\EYSF_PostDCO_Shortlist_Cumulative_Schemes_20240611.aprx



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East Yorkshire Solar Farm

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Basingstoke, RG21 7PP
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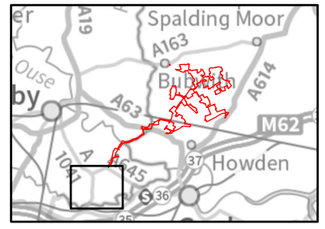
LEGEND

Order limits

87 - ZG2023/0732/OUTM: Residential Development at Land East Of Broadacres
Distance from Order limits: 2120.3m
South West



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ISSUE PURPOSE

Examination

PROJECT NUMBER

60683115

FIGURE TITLE

Application Boundaries for the shortlisted cumulative schemes
Sheet 41 of 41

FIGURE NUMBER

Appendix C