



OAKLANDS FARM SOLAR PARK

Applicant: Oaklands Farm Solar Ltd

Environmental Statement

Non-Material Change Supporting Statement (EIA Addendum)

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OAKLANDS FARM SOLAR PARK

ENVIRONMENTAL STATEMENT – NON-MATERIAL CHANGE SUPPORTING STATEMENT (EIA ADDENDUM)

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1 INTRODUCTION

1.1 OVERVIEW

- 1.1.1 Oaklands Farm Solar Limited (company number 12915335) of registered office 22 Chancery Lane, London, England, WC2A 1LS (“the Applicant”) is applying to the Secretary of State (“SoS”) under Regulation 4 Of The Infrastructure Planning (Changes To, And Revocation Of, Development Consent Orders) Regulations 2011 in order to make a non-material change to The Oaklands Farm Solar Park Order 2025 which was granted by the Secretary of State for Energy Security and Net Zero on 19th June 2025 (S.I. 2025 no. 739) as corrected by The Oaklands Farm Solar Park (Correction) Order 2025 (S.I. 2025 no. 1070) following an application made by the Applicant (the “Order”).
- 1.1.2 Oaklands Farm Solar Limited is the undertaker with the benefit of the Order which authorises consent for the construction, operation and decommissioning of an energy generating facility comprising ground mounted solar photovoltaic arrays and an on-site substation, together with an associated Battery Energy Storage System (“BESS”) facility and supporting infrastructure including a below ground electrical connection to the National Grid substation at the former Drakelow Power Station (the “Proposed Development”).
- 1.1.3 The proposed non-material change (“NMC”) application primarily seeks to amend the design parameters set out in table 4.2 of Chapter 4 of the Environmental Statement and Appendix B of the Design Statement as well as amending the parameter area for Work no. 1 in the Works Plans. All three documents are listed as documents to be certified within Schedule 12 of the Order:
- Works Plans - EN010122/S51/2.3 – AS-003 – May 2024;
 - Environmental Statement - Chapter 4 Project Description - EN010122/D6/6.1 - REP6-031 – November 2024; and
 - Design Statement - EN010122/D6/7.2 - REP6-035 - November 2024
- 1.1.4 As the NMC is seeking to directly amend the parameters within these documents both tracked and clean versions of these documents have been submitted with the clean version proposed to supersede the documents to be certified. The table below summarises the proposed changes

Change 1: Work No. 1 Parameter Area	
Extent of Work No. 1	Increase in parameter area of work no. 1
Change 2: Solar Panels (work no.1)	
Height of Panels	Increase maximum height from 2.7m to 3m within limited areas of Work No. 1 as shown on the Solar Panel Heights Parameter Plan attached at Appendix I of the Design Statement.

		The minimum height of the lowest part of the PV Panels will be 0.8m AGL except in limited areas where the minimum height of the lowest part of the solar PV modules will be up to 0.5m AGL.
Foundations		Increase the maximum depth of the foundations of the solar panels from 2m to 3m.
Mounting Rack		Allow the use of galvanised steel for the mounting rack in addition to the aluminium or stainless steel options.
Change 3 – MV Transformers (work no.1)		
New Transformers	SKID	Additional separate option for a larger “SKID” MV transformer station (“Skids”) with a dimension of 3m x 7.5m x 3m (height, length, width) with a maximum limit of up to 30 skids with concrete and compacted sand and gravel mix foundations to a depth of 1.5m
Change 4 - Substation (Work no. 3)		
Substation Transformers		Increase transformer dimensions from 7.2m x 5.3m x 3.7m (length, height, width) to 8.3m x 6m x 5m (length, height, width).
Concrete Blast Wall		Increase height from 5.2m to 6.3m.
Welfare foundations	Unit	Increase foundation depth from 0.1m to 0.6m.
Statcom Foundations		Increase foundation depth from 50mm to 1m to correct a typological error.
Change 5 – Jointing Bays (work no. 4)		
Jointing Bays		Increase the depth and width of the jointing bays from 12m x 2m x 2.6m (length, depth, width) to 12m x 4m x 3m (length, depth, width).
Change 6 - Onsite Cabling (work no. 7)		
Onsite cabling between battery containers, Power Conversion System (PCS) units, and from PCS to transformers		Reduce minimum cable depth from 0.9m to 0.7m, increase maximum trench size from 1.5m x 1.2m (width, depth) to 1.8m x 1.2m (width, depth) and to allow “in exceptional circumstances to cross features like other cables, the trench depth will be specific to engineering requirements”.
Onsite cabling between the transformer stations and the Proposed		Reduce minimum cable depth from 0.9m to 0.7m, increase maximum trench size from 1.5m x 1.2m (width, depth) to 1.8m x 1.2m (width, depth) and to allow “in exceptional

Development substation	circumstances to cross features like other cables, the trench depth will be specific to engineering requirements".
Onsite cabling between PV modules and inverters and from inverters to transformers	Reduce minimum cable depth from 0.9m to 0.7m, increase maximum trench size from 1.5m x 1.2m (width, depth) to 1.8m x 1.2m (width, depth) and to allow "in exceptional circumstances to cross features like other cables, the trench depth will be specific to engineering requirements".
Change 7 – Permanent Internal Access Tracks (work no. 7)	
Permanent internal access tracks (operational)	Increase the thickness of the internal access tracks from 200mm to 400mm of compacted stone/gravel, such as type 1/6F5.

2 GUIDANCE

2.1.1 The Department for Communities and Local Government (“DCLG”) published The Planning Act 2008: Guidance on Changes to Development Consent Orders guidance in 2015 (the “Guidance”) which provides non-statutory advice on the preparation and determination of applications to change development consent orders.

2.1.2 This Guidance confirms there is no statutory definition of a material or non-material change. It recognises that “given the range of infrastructure projects that are consented through the 2008 Act and the variety of changes that could possibly be proposed for a single project” it is not possible to prescribe whether any particular types of change would be material or non-material and it is very much dependent on the specific development itself.

2.1.3 However, the guidance does acknowledge that there may be certain characteristics that indicate where a change is more likely to be treated as material. These are summarised as follows:

- **Environmental Statement (“ES”)** (paragraphs 12-13) – a change should be treated as material if it would require an updated ES to take account of new, or materially different, likely significant effects on the environment. This includes changes to the ES resulting a likely significant effects which are entirely positive.

As set out on in Section 5.1 of this Document, the proposed changes result in no new, or materially different, likely significant effects on the environment and therefore the proposed changes are non-material;

- **Habitats and protected species** (paragraph 14) – a change is likely to be material if it would invoke the need for a Habitats Regulations Assessment (“HRA”), or the need for a new or additional European Protected Species Licence (“ESPL”).

As set out on in Section 5.2 of this Document, the proposed changes do not require a need for a HRA or any new or additional EPSLs;

- **Compulsory acquisition** (paragraph 15) – a change is likely to be material if it were to authorise the compulsory acquisition of any land, or an interest in or rights over land, that was not authorised through the existing Order.

As set out on in Section 5.3 of this Document, no additional compulsory acquisition of land or rights is required due to the proposed changes: and

- **Impact on business and residents** (paragraph 16) – the potential impact of the proposed changes on local people will also be a consideration in determining whether a change is material.

As set out on in Section 5.4 of this Document, the proposed changes do not result in any material new or different impacts on businesses and residents.

2.1.4 Therefore, the Applicant considers that the proposed changes are non-material with each point above addressed and considered in full in section 5 of this Document.

3 PROPOSED NON-MATERIAL CHANGES

3.1 OVERVIEW

- 3.1.1 The proposed changes relate to seven distinct elements of the Proposed Development. The changes have been reviewed by the original topic authors of each relevant chapter of the Environmental Statement that may be affected by the proposed changes, which was submitted with the application for the Order to confirm the changes do not result in materially different likely significant effects on the environment. The changes have resulted from the detailed design work undertaken since the Order was granted which has highlighted a need to slightly amend some of the existing parameters set out in Table 4.2 of Chapter 4 of the Environmental Statement **[REP6-031]** and Appendix B of the Design Statement **[REP6-035]** as well as the Works Plans **[AS-003]**. The Applicant considers these changes are minor in nature and will not give rise to any materially new or materially different environmental effects to those originally assessed as part of the application for the Order. In addition, the changes do not require additional compulsory acquisition of land, nor would they have new or different effects on local residents or business or any additional implications in respect of Habitats Regulation Assessment. This Environmental Statement – Non-Material Change Supporting Statement (EIA Addendum) provides evidence to support these conclusions.

3.2 CHANGE 1 – WORK NO. 1 – PARAMETER AREA

- 3.2.1 Through detailed procurement and design processes, the Applicant has been able to optimise the design by using newer technology. This primarily means the available land can be more effectively utilised to lay out the equipment to maximise efficiency and solar capacity. For example, more powerful inverter units can individually support a greater number of solar panel tables, and therefore more configurations of panel rows are possible to fit into irregularly shaped fields. Similarly, higher output solar panels mean the solar panel tables can be longer and therefore deployed more effectively in awkwardly shaped areas. To realise these optimisations, the Applicant proposes to slightly expand the footprint of work no. 1 in specific areas as shown in Appendix A and the revised Work Plans (Ref: EN010122/NMC/2.3). In addition, through the detailed design process the Applicant has identified three small areas which can be removed from the work no. 1 parameter area comprising the entirety of field 010, part of field 020 and a small area in field 04. This is because it is impractical to install solar panels in these areas due to the topography. The new amended area for work no. 1 along with an indicative solar panel layout is provided at Appendix A.
- 3.2.2 A Comparison Plan between the existing work no. 1 area and the proposed work no. 1 area is attached at Appendix B which highlights where the areas of work no. 1 have been extended and removed. This clearly shows that the proposed expansion accords with the general footprint of the Proposed Development. The Applicant considers the extensions are minimal, resulting in an overall increase of only 3.4% in the parameter area of work no. 1. Therefore, this change is non-material.
- 3.2.3 The revised Works Plan (ref. EN010122/NMC/2.3) captures the amendments to the parameter area of work no. 1.

3.3 CHANGE 2 – WORK NO. 1 SOLAR PANELS

Height of Solar Panels

- 3.3.1 It is proposed that in certain locations the maximum height of the solar panels is changed from 2.7m to 3m above ground level (“AGL”). The reason for the change is to allow for undulations in the topography of the Site in limited instances where the dips and slopes of the Site results in the solar panels technically exceeding the existing parameters, despite the solar tables on which the panels are mounted remaining consistent in height across the different rows of panels.
- 3.3.2 This change only affects a small number of panels across the site and to illustrate this a Solar Panel Heights Parameter Plan has been submitted as Appendix I of the revised Design Statement which limits the areas in which the solar panels heights are subject to the maximum height parameters of 3m AGL.
- 3.3.3 The change to the minimum height means that the minimum height of the lowest part of the solar panels will remain as 0.8m AGL except in limited areas where the minimum height of the lowest part of the panels will be up to 0.5m AGL. This is to allow for undulations in the topography of the Site in limited instances where the dips and slopes of the Site results in the solar panels technically exceeding the existing parameters, despite the solar tables on which the panels are mounted remaining consistent in height across the different rows of panels.

Mounting Rack and Pile Foundations

- 3.3.4 Following detailed ground investigation works it is proposed that the maximum allowable depth of the foundation piles is increased from 2m to 3m. The proposed material for the mounting rack, which currently proposes using aluminium or stainless steel, is to be amended to also allow for the use of galvanised steel to allow design flexibility and the omission of this material was merely an oversight.

3.4 CHANGE 3 – MV TRANSFORMER STATIONS

- 3.4.1 The original parameters allowed for a range of sizes of Medium Voltage (“MV”) transformer station options to be installed with a combination of up to 70 transformer stations provided for across the parameter area for work no. 1.
- 3.4.2 The existing design parameters provided for the installation of compact transformer stations with options for a smaller unit (630–1800kVA) with dimensions of 2.4m x 3.4m x 2.25m (height, length, width) and a larger unit (2000-3150kVA) with dimensions of 3m x 4.1m x 2.9m (height, length, width). The foundations in each case were stated to consist of crushed stone material foundations 0.5m below surface, with earth bunds built up around the base and 50cm wide x 5cm thick concrete paving surrounding transformer station (so no concrete underneath the transformers).
- 3.4.3 Since the original illustrative design was conceived, different technology is now available to the Applicant, which offers design optimisation benefits whilst not resulting in any new or materially different likely significant effects on the environment. Therefore, the change application now seeks to add a separate option

for a larger “SKID” MV transformer station (“Skids”) with a dimension of 3m x 7.5m x 3m (height, length, width) requiring a foundation depth of 1.5m and a maximum limit of up to 30 Skids. Due to their larger size, fewer Skids are required compared to the currently approved transformer stations therefore, requiring less space within the work no. 1 area.

- 3.4.4 As a result of this proposed change, the Proposed Development could only allow up to 70 smaller or larger compact transformer stations or combination thereof, or up to 30 Skids. Therefore, it would not be possible to provide a combination of existing compact transformer stations and proposed Skids. Therefore, the Applicant proposes changing the design parameters (table 4.2 of the ES Chapter 4 and Appendix B of the Design Statement) to retain the use of the smaller and larger MV Transformer Stations (Option 1), and an alternative solution utilising the Skids (Option 2).

3.5 CHANGE 4 – WORK NO. 3 SUBSTATION

Substation Transformer

- 3.5.1 The original parameters allowed for a maximum dimension of 7.2m x 5.3m x 3.7m (length, height, width) for the substation transformer units (maximum of 2, per Table 4.2 of Chapter 4 of the Environmental Statement **[REP6-031]**), but this does not specify if this comprises the fully assembled transformer with the additional electrical paraphernalia attached to the main body of the transformer. Therefore, for clarity and avoidance of doubt the parameter is now proposed to be 8.3m x 6m x 5m (length, height, width) which represents the maximum parameters of the substation transformer(s) fully assembled, including the additional electrical paraphernalia.
- 3.5.2 To confirm, the height of the assembled transformer remains well below the tallest part of the substation which is the Overhead Busbar at a height of 7.4m.
- 3.5.3 In addition, the concrete blast wall is to be increased from 5.2m in height to 6.3m, to align with the proposed change to the description of the substation transformer units and to maintain compliance with safety requirements.

Welfare Unit And Storage And Statcom Foundations

- 3.5.4 Following the detailed design of the welfare unit and storage and statcom elements of the substation area, the foundation depths for these elements need to be increased slightly.
- 3.5.5 For the Welfare Unit And Storage, the foundation depth would need to increase from 0.1 to 0.6m and for the statcom, the foundation depth would need to increase from 50mm to 1m.

3.6 CHANGE 5 – WORK NO. 4 JOINTING BAYS

- 3.6.1 Following detailed design and input from the chosen grid connection provider, it is considered optimal to increase the depth and width of the jointing bays from 12m x

2m x 2.6m (length, depth, width) to 12m x 4m x 3m (length, depth, width). This enables a more efficient method of installation.

- 3.6.2 Following the detailed designs from the chosen grid contractor, the preferred installation technique for underground cable jointing bays involves the use of a structure sunk around the bay to provide a controlled environment for the installation process. This requires a larger footprint than detailed in the design parameters in which it is proposed to increase the depth and width of the jointing bays from 12m x 2m x 2.6m (length, depth, width) to 12m x 4m x 3m (length, depth, width). This enables a more efficient method of installation. The structure required for this installation technique is removed and excavated material backfilled after the installation process is complete, which is generally within a matter of days.

3.7 CHANGE 6 – WORK NO. 7 ONSITE CABLING

- 3.7.1 Work no. 7 includes three aspects on onsite cabling:

- between battery containers, Power Conversion System (PCS) units, and from PCS to transformers;
- between the transformer stations and the Proposed Development substation; and
- between PV modules and inverters and from inverters to transformers.

- 3.7.2 The parameters allowed for a minimum cable depth of 0.9m and a maximum cable trench dimension of 1.5m wide and 1.2m deep. Following detailed design work including investigations of ground conditions and characteristics such as soil resistivity, it is now proposed that the minimum buried cable depth would be 0.7m below ground level and the maximum cable trench dimensions would be 1.8m wide and 1.2m deep, apart from in exceptional circumstances to cross features such as other cables, where the trench depth will be specific to engineering requirements.

3.8 CHANGE 7 – WORK NO. 7 PERMANENT INTERNAL ACCESS TRACKS

- 3.8.1 Currently the parameters allow for a permanent access track of 3.5 – 6.0m wide made up of 200mm of type 1 compacted stone/gravel with a geotextile membrane, or mown grass corridor. It is now proposed that this is amended to allow up to 400mm of compacted stone/gravel, such as type 1/6F5, with a geotextile membrane, or mown grass corridor.
- 3.8.2 It should be noted that the additional 200mm of the material would be used to build up the road as opposed to requiring further excavation.

4 CHANGES TO THE OAKLANDS FARM SOLAR PARK ORDER 2025

4.1 INTRODUCTION

4.1.1 The Oaklands Farm Solar Park Order 2025 comprises 42 articles and 13 schedules. This NMC only seeks changes to Schedule 12. The reason for this change is set out below.

4.1.2 The relevant extracts of the Order are set out below:

Definitions

“environmental statement” means the document certified by the Secretary of State as the environmental statement for the purposes of this Order in accordance with article 34 (certification of plans, etc);

“design parameters” means the principles and assessments set out in the environmental statement and table 4.2 of the environmental statement (design parameters used in the EIA);

“design statement” means the document certified by the Secretary of State as the design statement for the purposes of this Order in accordance with article 34 (certification of plans, etc);

Article 3(2):

(2) Each numbered work must be situated within the corresponding numbered area shown on the works plans and must not exceed the design parameters assessed in the environmental statement.

Requirement 5:

5.—(1) No phase of the authority development may commence until details of....relating to that phase have been submitted to and approved in writing by the local planning authority.

(2) The details submitted must accord with—

(a)the site location plan;

(b)the works plan;

(c)the design parameters; and

(d)the outline design principles as set out in the design statement, or such variation thereof as may be approved by the local planning authority pursuant to requirement 25.

(3) The authorised development must be carried out in accordance with the approved details

4.1.3 As a result of the above, the proposed changes are not permitted within the terms of the Order as originally made. This is because there is no clear route whereby the design parameters can be amended, in accordance with the terms of the Order, with

the consent of the local planning authority. In order to introduce the design changes, the wording of the articles or requirements do not need to be amended, but what does need to be amended is the underlying documents that are referred to and bind the specific design parameters. These include the works plans, chapter 4 of the environmental statement and the design statement.

- 4.1.4 The Amendment Order will function to change the references of these documents in Schedule 12 to the references of the documents submitted with this Non-Material Change Application. This will enable the undertaker of the Order to lodge updated documents with the Secretary of State in accordance with article 34 of the Order that incorporate the changes set out in this document.
- 4.1.5 The Amendment Order will also introduce a new document referred to in Schedule 12. This will be the Environmental Statement – Non-Material Change Application Supporting Statement (EIA Addendum). This will ensure that the environmental statement read as a whole is consistent with the change of parameters introduced by setting out, as per section 5 (Appraisal) below, an analysis of the implications of the changes for the environmental statement.
- 4.1.6 The Order will then function exactly as original granted except for the minor changes to parameters set out above.

5 APPRAISAL

5.1 ENVIRONMENTAL STATEMENT

- 5.1.1 One of the tests of the materiality set out in the Guidance is whether the changes would require an updated ES to take account of new, or materially different, likely significant effects on the environment.
- 5.1.2 The changes proposed are not materially new elements being introduced to the Proposed Development but are slight adjustments to approved parameters to account for detailed design requirements, with the environmental effects of those parameters having already been assessed in the ES. Therefore, there is no requirement for further consideration of the potential for new effects arising from the introduction of new elements into the Proposed Development.
- 5.1.3 However, it is necessary to consider whether the changes to approved parameters would result in effects which are materially different from the original assessment in the ES that would require an update to the ES and additional mitigation.
- 5.1.4 Based on the nature of the proposed changes only certain elements of the environment have the potential to be affected. Therefore, each proposed change has been considered against the assessment in the ES for each chapter where it is relevant to the change in that the change could potentially affect the conclusions of the assessment in that chapter.
- 5.1.5 The changes have been reviewed by the original topic authors of each relevant chapter of the ES that may be affected by the proposed changes to confirm the changes do not result in materially different likely significant effects on the environment.

Change 1 - Work no. 1 – Parameter Area

- 5.1.6 In considering the amendment to extend the parameter for work area 1 consideration has been given to the potential effects on the conclusions of the following ES Chapters: Chapter 5: Landscape and Visual Amenity, Chapter 6 Ecology, Chapter 8: Water Resources, Chapter 9: Ground Conditions, Chapter 11: Noise, Chapter 14: Glint and Glare and Chapter 15: Agricultural Land and Soils.
- 5.1.7 For **Landscape and Visual Amenity**, the ES topic author has confirmed that whilst the parameter area would be extended closer to the edges of some fields it does not incorporate any new fields or areas that were not previously within work no. 1. The extended area of work no. 1 would not have any notable effect on the proposed Landscape Strategy proposed as shown on the Illustrative Landscape Strategy Plan (Appendix A of Appendix 5.6 Outline Landscape and Ecological Management Plan (“LEMP”) [REP4-040]).
- 5.1.8 The extension to the parameter area for work no. 1 would not result in the loss of any additional trees or hedgerows and the final detailed design and layout will remain subject to approval from the relevant Local Planning Authority along with an Arboricultural Method Statement (Requirement 7) and a detailed LEMP (Requirement 8). In addition, it is recognised that there are three small areas removed from work

no. 1 and installation of solar panels particularly field 010 is now omitted and part of field 020 is reduced. There is likely to be a nominal benefit in terms of landscape and visual amenity however, this benefit is de minimis and does not significantly change the landscape strategy.

- 5.1.9 Overall, the change to the parameter area of work no. 1 would have a minimal impact on the landscape and visual amenity and no change to the assessment in ES Chapter 5 – Landscape and Visual Amenity as confirmed by the topic author and the change is therefore non-material.
- 5.1.10 In terms of **Ecology**, the ES topic author has confirmed that the expansion of the parameter area for work no 1 would not have any effect on ecology beyond that already assessed given the change is entirely within the order limits which has been fully assessed for the impacts on ecology and the mitigation proposed sufficiently accounts for any potential effects on ecology arising from the Proposed Development. Whilst three areas are removed from work no. 1 parameter the extent of work no. 1 is increasing by around 3.4 %. However, the removal on an entire field (010) would provide an opportunity for more coherent, albeit negligible, ecological benefits. The final detailed design of the Proposed Development will consider the impacts on ecological receptors in which Requirement 21 (Protected Species) requires the protected species surveys to be carried out to inform the relevant mitigation measures required.
- 5.1.11 With regard to Biodiversity Net Gain (“BNG”), the proposed changes being sought in this application would not affect the Applicant’s ability to deliver the BNG committed to in the Order, as the expanded solar panel footprint under work area 1 offers the same areas for species rich grassland planting, and no hedgerows and trees are affected with the final BNG to be confirmed and approved under Requirement 8 LEMP, in Appendix 6.12 – Biodiversity Net Gain Report [APP-131] of the ES and as required by Requirement 8(1)(e) in the detailed LEMP.
- 5.1.12 Overall, the change to the parameter area of work no. 1 would have a minimal impact on ecology and no change to the assessment in ES Chapter 6 – Ecology as confirmed by the topic author and the change is therefore non-material.
- 5.1.13 In considering **Water Resources** (Chapter 8) the ES topic author has confirmed that the expansion of the parameter area for work no 1 would not have any effect on the proposed drainage which allows surface water to run off the onto the vegetated ground below and infiltrate to ground as per the current greenfield arrangement. In addition, it is recognised that there are three areas removed from work no. 1 and installation of solar panels which are likely to be undeveloped forming part of landscaped area once operational. Therefore, the assessment in the ES remains valid and the change is therefore non-material.
- 5.1.14 For **Ground Conditions** (Chapter 9), the ES topic author has stated that the expansion of the parameter area for work no 1 would have no effect on the ground conditions and the assessment in the ES remains valid. In addition, it is recognised that there are three areas removed from work no.1 meaning that the installation of solar panels will not be possible resulting in the area forming part of the landscape buffer. Therefore, the change is therefore non-material.
- 5.1.15 In terms of **Noise** (Chapter 11), the ES topic author has confirmed the string inverters are the principal noise source associated with work no. 1 and the predicted noise levels at receptors depend on the positioning of the sting inverters and any screening

of these noise sources provided by the solar panels. The design previously assessed as part of the Environmental Statement aimed to place the string inverters furthest from receptors where practicable. This approach will remain the same and therefore, the expansion of parameter area for work no. 1 are unlikely to result in any significant change in noise levels at receptors.

- 5.1.16 It is also recognised that it is proposed to omit some land from the parameter area of work no. 1, specifically, the whole of field 010 and approximately half of field 020. Therefore, there is a potential for reduction of noise sources in relation to Walton Lane Farm (reducing noise) or reduction of screening of noise sources provided by solar panels (increasing noise). The ES topic author confirmed that in removing the solar panels and associated plant from the noise model in this area there would be a change at the nearest receptor of less than 0.1dB. Therefore, the proposed change would have no material impact on the noise assessment in the ES. Notwithstanding this, Requirement 15 of the DCO requires a detailed assessment of the operation noise to be undertaken to ensure the operational noise rating levels as set out in the outline operational environmental management plan are to be complied with.
- 5.1.17 Therefore, the change to the parameter area of work no. 1 would have a negligible impact on noise and no change to the assessment in ES Chapter 11 – Noise as confirmed by the topic author and the change is therefore non-material.
- 5.1.18 With regard to **Glint and Glare**, the ES topic author has stated that the minor extension of the parameter area, including the removal of some areas, for work no 1 would not have any effect on the assessment in ES Chapter 14 as the modelling process is such that small variations will not have a significant impact on the overall conclusions. Therefore, the change is therefore non-material.
- 5.1.19 For **Agricultural Land and Soils**, the ES topic author has confirmed the minor extension of the parameter area for work no 1 would not have any effect on the assessment of the agricultural land and soils particularly with a small amount of land now omitted from the work no. 1 area. Therefore, the assessment in Chapter 15 of the ES remains unchanged and the change is non-material.
- 5.1.20 Overall, the change to the parameter area of work no. 1 would have a minimal impact on the relevant ES topics and would result in no change to the assessments in ES as confirmed by the relevant topic authors. It is therefore clear that this change is non-material.

Change 2 - Work No. 1 Solar Panels

- 5.1.21 The three elements contained in Change 2 (increase in some panel heights, material of mounting racks, and depth of foundation piles) have the potential to affect the conclusions of ES chapters 5 (Landscape and Visual Amenity), 8 (Water Resources), 9 (Ground Conditions), 14 (Glint and Glare) and 15 (Agricultural Land and Soils).
- 5.1.22 In considering the change in height of the solar panels on the effects on **Landscape And Visual Amenity**, as shown in Figure 3, the ES topic author has confirmed the majority of the affected panels are within the centre of the site (Fields O4, O5, O8, O11, O13, O19), well away from the edges where the change could be more visually apparent. The key visual receptors within the central part are users of the Cross Britain Way where the route crosses the Site. However, users of this recreational walking route will be separated from the site by hedgerows, as indicated on the

Illustrative Landscape Strategy Plan (Appendix A of Appendix 5.6 Outline Landscape and Ecological Management Plan [REP4-040]). Additionally, users of the route near Field O8 will be separated from the panels by woodland associated with Redferns Wood.

- 5.1.23 The eastern most field of the site (Field O8) includes some solar panels that will be seen from the village of Rosliston, where they will extend across fields that form the horizon. There will be a limited change in the view as a result of the increase in panel height, with a small additional part of the skyline being obscured by panels. Distant trees will still be seen as skyline features, alongside the prominent existing pylons which form an evident feature within the view.
- 5.1.24 The slight increase in height of some of the panels will mean that the arrays will have a more consistent, flowing appearance, and will be less influenced by local irregularities (such as hollows or mounds) in the ground levels, which could lead to an untidy or stepped appearance between panels, and which would draw the eye by making the Proposed Development more apparent. The proposed change in height will prevent this design feature and will result in an improved overall appearance of the Proposed Development. Therefore, the assessment in Chapter 5 of the ES remains unchanged and the change is non-material.
- 5.1.25 The change to allow for the use of galvanised steel for the mounting racks in addition to aluminium or stainless steel would have no perceptible change to the appearance of the Proposed Development and is therefore non-material with regard to the assessment of the landscape and visual amenity in the ES. The change to the foundation pile depth has no implications on landscape and visual amenity.
- 5.1.26 **Water Resources and Ground Conditions** - the ES topic authors considered the change in height of the panels to be superficial as the change will not affect the ground conditions or water resources. In terms of the increased depth of the foundations for the panels, the piles use a driven (displacement) technique in which no additional waste soil will be generated. Therefore, the assessment in Chapters 8 and 9 of the ES remains unchanged and the change is non-material.
- 5.1.27 In terms of **Glint and Glare**, the pile foundation depths and mounting rack changes have no implications on glint and glare. For the change to the panel heights, the ES topic author confirmed the wording in the ES with respect to mitigation states that the following is proposed: ‘Hedgerow maintenance and gap filling to obscure the reflecting panels from view’. This commitment, alongside the negligible increase in panel height in glint and glare terms, means that mitigation will still be achievable through the hedgerow maintenance and gap filling as approved under the outline LEMP [REP4-040], which includes allowing existing hedgerows to grow to at least 3m in height and to a density such that it provides adequate screening to the surrounding road users. It is concluded that the changes outlined would have no material impact on the overall conclusions of the Glint and Glare Assessment in the ES.
- 5.1.28 **Agricultural land and soils** - the slightly reduced clearance of 0.5m above ground level for the front edge of solar panels installed on upward sloping ground may hinder the free movement of sheep around these panels, however, given the extent of the solar farm and spacing around and between rows of panels, and the limited areas in which this may occur, it will have a negligible effect on the ability to graze sheep on the site and no change to the assessment in the ES. In addition, the increase in the piled foundation depth from 2m to 3m would have no effect on the quality of

agricultural land and soils as the topsoil (the key determinant in the quality of agricultural land) across the Site is between 25cm to 30cm. As the piles use a driven (displacement) technique the additional depth would have a negligible effect on subsoils. Therefore, this would not change the assessment nor conclusions in the ES. Therefore, the change is non-material.

- 5.1.29 Overall, the change to the height of a small number of panels, the mounting rack material and increased pile depth foundation would have a minimal impact on the relevant ES topics and would result in no change to the assessments in ES as confirmed by the relevant topic authors. It is therefore clear that this change is non-material.

Change 3 - MV Transformer Stations and Skids

- 5.1.30 In considering the amendment to MV transformers section to provide for the additional option of utilising Skids, consideration has been given to the potential effects on the conclusions of the following ES Chapters: Chapter 5: landscape and Visual Amenity, Chapter 8: Water Resources, Chapter 9: Ground Conditions, Chapter 11: Noise and Chapter 15: Agricultural Land and Soils.
- 5.1.31 In terms of **Landscape And Visual Amenity**, the ES topic author acknowledges that whilst the Skids are overall larger than the MV Transformer Stations Units (length is 3.4m longer and the width is 0.1m wider than the large version of MV Transformer Station Unit), the height of the new Skids is consistent with the original maximum height parameter of 3m. Also, the number of Skids transformers would be limited to up to 30 compared to the current parameter of up to 70 MV transformer station units. Furthermore, the Skids will not be seen in isolation, but adjacent to and within the solar panel array which in some cases will obscure the Skids from views. The height is the key dimension in terms of effect upon views, and this will be maintained as per the existing parameter. The deeper foundations required for the Skids have no bearing on landscape and visual amenity. Therefore, the assessment in Chapter 5 of the ES remains unchanged and the change is non-material.
- 5.1.32 For **Water Resources and Ground Conditions**, the ES topic author considered the reduction in the maximum number of MV Transformers from 70 to 30 would result in a slight reduction of impermeable area across the site and the increased foundation depth to 1.5m would have a negligible impact. Therefore, the assessment in Chapters 8 and 9 of the ES remains unchanged and the change is non-material.
- 5.1.33 In terms of **Noise**, the ES topic author confirmed that the previous assumption used for the Noise Assessment undertaken was that each MV transformer station unit had a sound power level (“Lw”) of 64 dBA. The manufacturers noise data provided for the proposed Skids indicates that the sound power level of between 67 and 69 dBA. In simple terms a decrease from 70 to 30 units is a reduction of 3.7 dB, which balances against the sound power level increase of approximately 4 dB. In the noise model, the MV transformer station units had the lowest contribution to noise levels at receptors; consequently, a relatively small increase in the sound power level of the Skids would have no effect on the predicted noise levels at receptors and the proposed mitigation remains appropriate. The deeper foundations required for the Skids have no bearing on noise. Therefore, the assessment in Chapter 11 of the ES remains unchanged and the change is non-material.

- 5.1.34 For **Agricultural Land and Soils**, the ES topic author has confirmed the use of Skids which are longer and wider, with deeper foundations than the MV transformer station units will have a negligible effect on agricultural land which is more than compensated for by the reduced number from a maximum of 70 to a maximum of 30. The area of land occupied by the transformers only accounts for 0.1ha of agricultural land and thus the overall effect remains negligible. Therefore, the foundation depth for the Skids does not result in a change to the mitigation and management of the subsoil to be stored on site during the operation of the proposed development and is a negligible change. Therefore, the assessment in Chapter 15 of the ES remains unchanged and the change is non-material.
- 5.1.35 Overall, the change to include a third Skid option for the MV transformers would have a minimal impact on the relevant ES topics and would result in no change to the assessments in ES as confirmed by the relevant topic authors. It is therefore clear that this change is non-material.

Change 4 - Work No. 3 Substation

- 5.1.36 In considering the amendments to the substation transformers, consideration has been given to the potential effects on the conclusions of the following ES Chapters: Chapter 5: landscape and Visual Amenity, Chapter 8: Water Resources, Chapter 9: Ground Conditions and Chapter 15: Agricultural Land and Soils.
- 5.1.37 In terms of **Landscape And Visual Amenity**, the ES topic author confirmed that as the substation transformers and solid concrete blast wall will remain below the height of the highest part of the substation (being the busbars and other overhead electrical infrastructure, which are up to 7.4m in height) and that there is no change to the location of the substation, which is proposed within a flatter part of the site, away from residential properties and which would be surrounded in all directions by proposed solar panels, the proposed change to the work no.3 - substation parameters will have no change to the assessment in Chapter 5. Therefore, the change is non-material.
- 5.1.38 For **Water Resources and Ground Conditions**, the ES topic author confirmed that whilst the substation transformer size has increased slightly, the outline drainage calculations assumed a worst-case scenario whereby the entire substation footprint would be impermeable. Therefore, any increase in substation transformer size does not change the assessment undertaken in Chapter 8. Chapter 9 is not affected by these dimensional changes and the minor foundation depth increases. Therefore, the assessment in Chapters 8 and 9 of the ES remains unchanged and the change is non-material.
- 5.1.39 For **Agricultural Land and Soils**, the ES topic author has confirmed the alterations to the dimensions of components of the substation area will not have an adverse effect on the assessment. As set out in the ES Chapter, the assessment assumed that the substation and BESS involved the loss of the whole of the field as a worst-case scenario, and minor differences as proposed have no effect on the assessment. Therefore, the assessment in Chapter 15 of the ES remains unchanged and the change is non-material.
- 5.1.40 Overall, the changes would have a minimal impact on the relevant ES topics and would result in no change to the assessments in ES as confirmed by the relevant topic authors. It is therefore clear that this change is non-material.

Change 5 – Work no. 4 Jointing Bays

- 5.1.41 In considering the amendment to jointing bay dimensions consideration has been given to the potential effects on the conclusions of the following ES Chapters: Chapter 8: Water Resources, Chapter 9: Ground Conditions and Chapter 15: Agricultural Land and Soils.
- 5.1.42 With regard to Chapter 8 – **Water Resources**, the ES topic author confirmed that as the structure used to create a controlled environment around excavations to install the jointing bay will only be present for a short period (likely to be a matter of days at most), and the joint bays will be backfilled with arisings and reinstated, the assessment remains unaffected with potential surface water impacts considered within the Construction Environmental Management Plan (“CEMP”) (Requirement 9) and accompanying Surface Water Management Plan. Therefore, the assessment in Chapter 8 of the ES remains unchanged and the change is non-material.
- 5.1.43 Similarly, for Chapter 9 – **Ground Conditions**, the ES topic author confirmed that there would be no effect as once complete the joint bays will be backfilled with arisings and reinstated. Therefore, the assessment in Chapter 9 of the ES remains unchanged and the change is non-material.
- 5.1.44 Similarly, for **Agricultural Land and Soil** the proposed jointing bay dimension increases will have a negligible impact on agricultural land and soil. Therefore, the assessment in Chapter 15 of the ES remains unchanged and the change is non-material.
- 5.1.45 Overall, the change to jointing bays would have a minimal impact on the relevant ES topics and would result in no change to the assessments in ES as confirmed by the relevant topic authors. It is therefore clear that this change is non-material and therefore acceptable.

Change 6 – Work no. 7 Onsite Cabling

- 5.1.46 In considering the amendment to the onsite cabling trenching consideration has been given to the potential effects on the conclusions of the following ES Chapters: Chapter 8: Water Resources, Chapter 9: Ground Conditions and Chapter 15: Agricultural Land and Soils.
- 5.1.47 With regard to Chapter 8 – **Water Resources**, the ES topic author confirmed that the small increase in depth and width of below-ground trenches will have no bearing on water resources, and as the trenches are only open temporarily and will be backfilled once cables are installed, the assessment remains unaffected with potential surface water impacts considered within the CEMP (Requirement 9) and accompanying Surface Water Management Plan. Therefore, the assessment in Chapter 8 of the ES remains unchanged and the change is non-material.
- 5.1.48 For Chapter 9 – **Ground Conditions**, the ES topic author confirmed that there would be no effect as once complete the trenches will be backfilled with arisings and reinstated and therefore no additional soil is required to be stored. Therefore, the assessment in Chapter 9 of the ES remains unchanged and the change is non-material.

- 5.1.49 In terms of **Agricultural Land and Soils**, the proposed changes to cable trench dimensions (an additional width of 30cm and reduction of 20cm in depth) will result in very small differences in the amount of soil excavated. Whilst the installation of cabling disturbs soils including topsoil and subsoil the ES mitigation already captures the appropriate requirements to manage this through the outline Soil Management Plan which forms an appendix to Appendix 4.3: Outline CEMP **[REP6-018]**. The appropriate management of the soil will therefore be captured in the detailed Soil Management Plan. Therefore, there will be no new or materially different effects to those assessed in the ES and the change is non-material.
- 5.1.50 Overall, the change to the onsite cabling trenches would have a minimal impact on the relevant ES topics and would result in no change to the assessments in ES as confirmed by the relevant topic authors. It is therefore clear that this change is non-material and therefore acceptable.

Change 7 – Work No. 7 Permanent Internal Access Tracks

- 5.1.51 In considering the amendment to the permanent internal access tracks consideration has been given to the potential effects on the conclusions of the following ES Chapters: Chapter 8: Water Resources, Chapter 9: Ground Conditions and Chapter 15: Agricultural Land and Soils.
- 5.1.52 For **Water Resources** and **Ground Conditions**, the ES topic author confirmed the change in thickness (depth) of the temporary and permanent access tracks does not affect the assessments in Chapters 8 and 9 in any regard. The design is such that only topsoil will be stripped (as per the proposed methods set out in the outline Soil Management Plan which forms an appendix to Appendix 4.3: Outline CEMP **[REP6-018]**) but with a thicker layer of stone placed on top of the subsoil/ subgrade. Therefore, the assessment in Chapters 8 and 9 of the ES remains unchanged and the change is non-material.
- 5.1.53 For **Agricultural Land and Soil**, the ES topic author confirmed that given the track does not require additional excavation but instead the depth will be achieved by building up the track by an additional 200mm the existing mitigation remains applicable and the assessment in the ES remains unchanged. Therefore, the change is non-material.
- 5.1.54 Overall, the change to the permanent internal access tracks would have a minimal impact on the relevant ES topics and would result in no change to the assessments in ES as confirmed by the relevant topic authors. It is therefore clear that this change is non-material and therefore acceptable.

Summary

- 5.1.55 The Applicant and topic specialists have assessed the implications of the changes in respect of the Environmental Statement submitted as part of the Application for the Order. The Applicant is of the view that none of the changes proposed introduce materially new or materially different environmental effects and are all non-material in nature.

5.2 HABITATS AND PROTECTED SPECIES

- 5.2.1 The Secretary of State confirmed in their decision letter that, “Based on the information available to him and subject to the mitigation measures as secured in the final Order, the Secretary of State is satisfied that the Proposed Development, either alone or in-combination with other plans or projects, will not adversely affect the qualifying features of the protected site.”
- 5.2.2 The proposed changes and the assessments by topic specialists set out in this NMC application do not change this conclusion.

5.3 COMPULSORY ACQUISITION

- 5.3.1 The proposed changes sought by the NMC application will not authorise the compulsory acquisition of any land, or an interest in or rights over land, that was not authorised through the existing Order. No change is proposed to the Order limits.

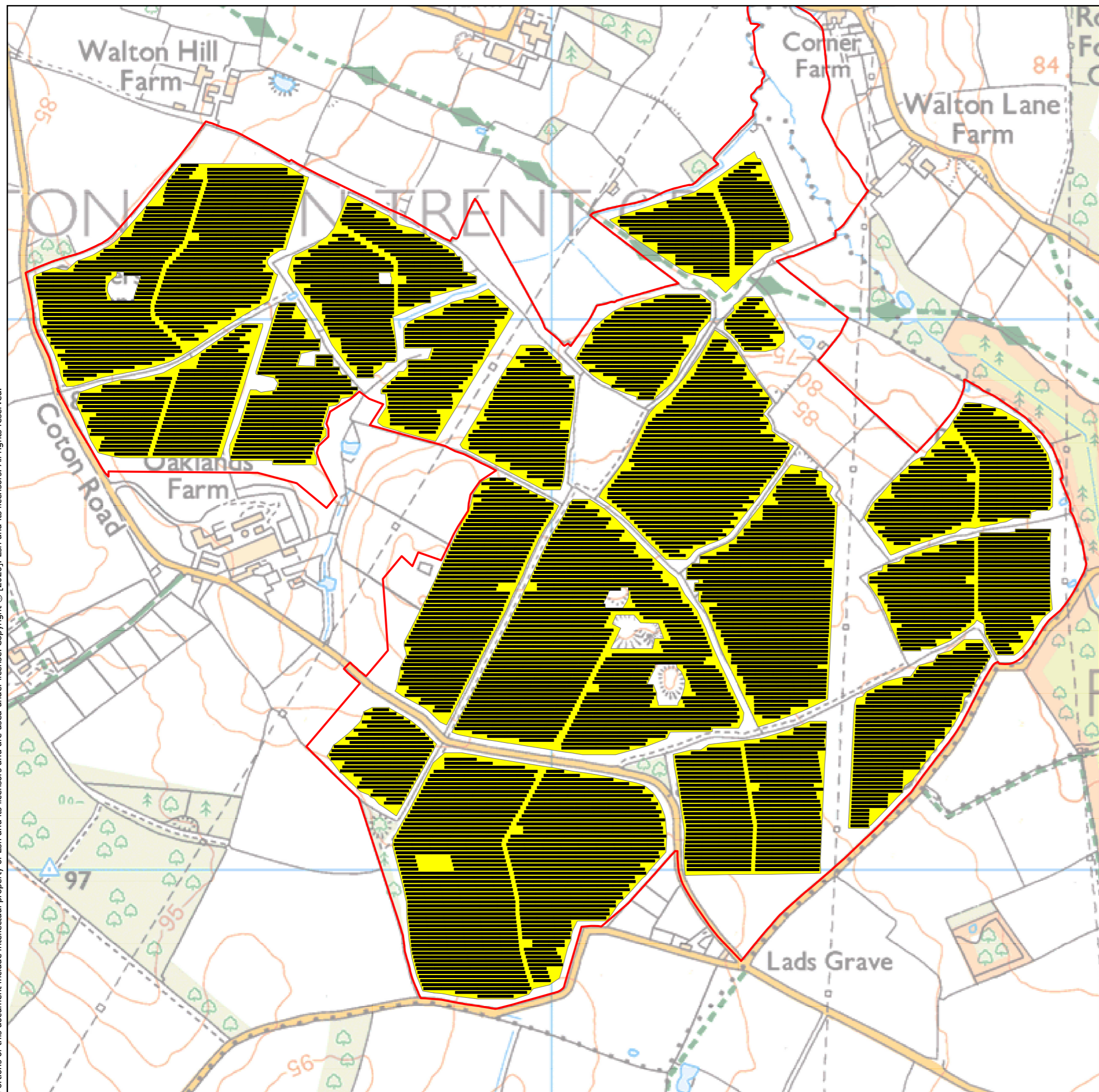
5.4 IMPACT ON BUSINESSES AND RESIDENTS

- 5.4.1 The changes proposed by this NMC application will not give rise to any new, or materially different, impacts on businesses and residents. The effects on businesses and residential receptors have been considered within the various chapters of the ES which has been considered in section 5.1 of this Statement. This has confirmed that the proposed changes do not change the conclusions of the ES and therefore do not have any impacts on businesses and residential which are material.

6 CONCLUSION

- 6.1.1 In conclusion, it has been demonstrated that none of the proposed changes will give rise to any materially new or materially different environmental effects to those originally assessed as part of the application for the Order, nor would they require additional compulsory acquisition of land, nor would they have new or different effects on local residents or business or any additional implications in respect of habitats regulation assessment.
- 6.1.2 Therefore, for the reasons set out in this Environmental Statement – Non-Material Change Supporting Statement (EIA Addendum), none of the materiality criteria set out in the Guidance are engaged, the changes are all non-material in nature, and should therefore be approved by the Secretary of State on this basis.

Appendix A – Figure 1 Revised Parameter Area for Work no.1 and indicative Solar Panel layout



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- Order Limits / Site Boundary
- Indicative PV Layout
- Work Area 1 - Revised

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	ISSUED TO: AMS

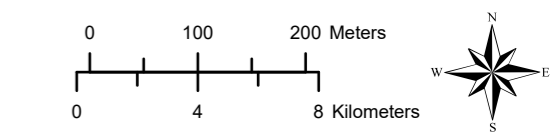


FIGURE 1:
Revised Parameter Area for Work no.1 and indicative PV panel layout



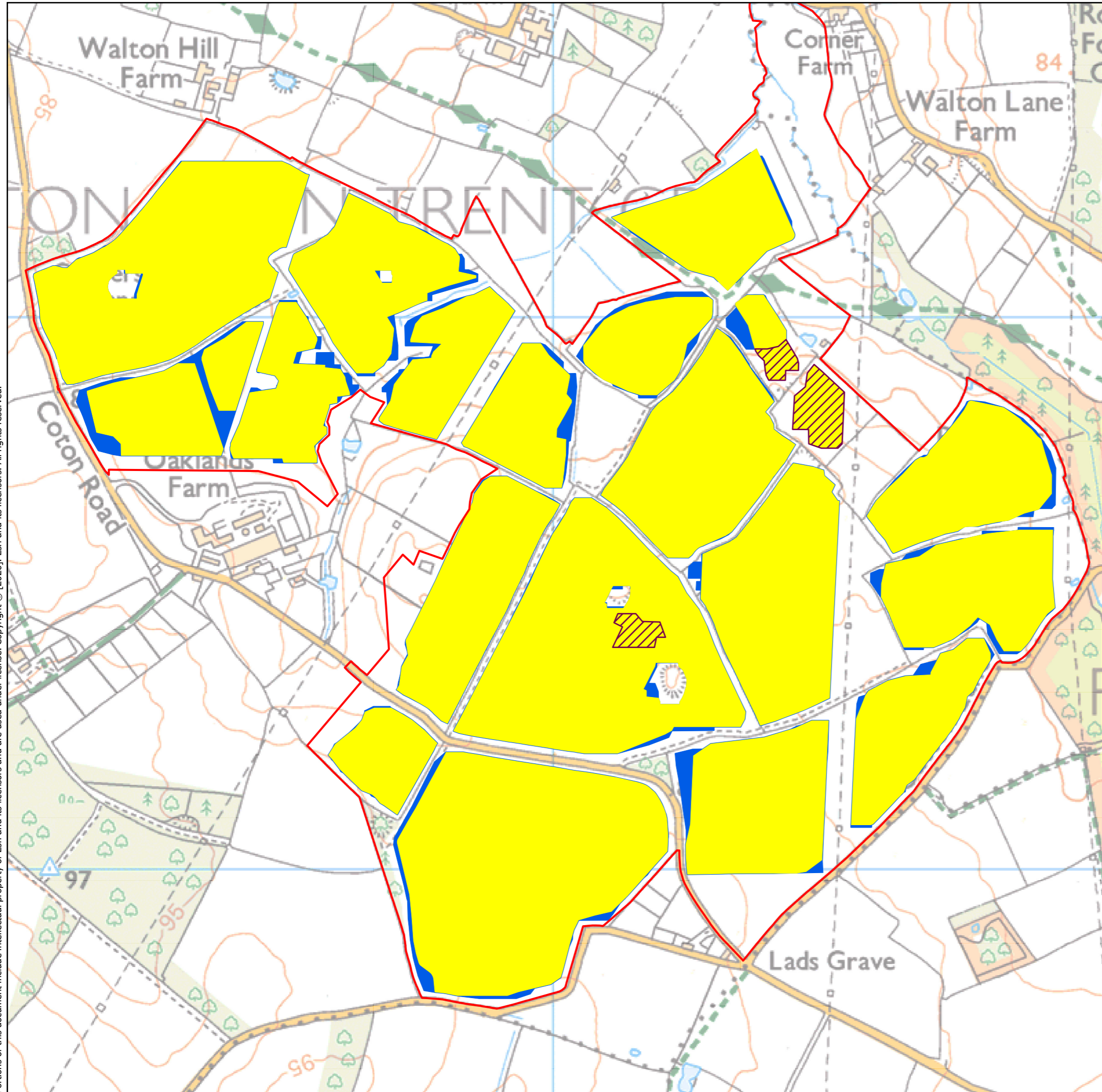
PROJECT:
Oaklands

Spatial Reference:
Name: British National Grid
PCS: British National Grid
GCS: GCS OSGB 1936
Projection: Transverse Mercator



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Appendix B – Figure 2 Work no.1 Area Comparison Plan



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- Order Limits / Site Boundary
- Work Area 1 - Original PV Areas
- Work Area 1 - Extended PV Areas
- Sections removed from revised Work Area 1

FIGURE REF: OAK4c.v3	
DATE OF ISSUE: 21/05/2026	
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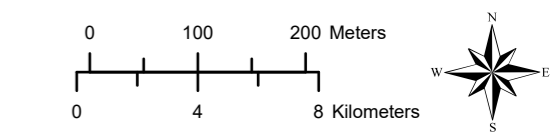


FIGURE 2:
Work no.1 Area Comparison Plan



PROJECT:
Oaklands

Spatial Reference:
Name: British National Grid
PCS: British National Grid
GCS: GCS OSGB 1936
Projection: Transverse Mercator



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