Springwell Solar Farm

Planning Statement Addendum

Deadline 1
EN010149/APP/8.12
June 2025
Springwell Solar Energy Farm Ltd

APFP Reg 5(2)(q)

Planning Act 2008

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

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1. Introduction

1.1. Purpose of this report

1.1.1. This document constitutes an addendum to the **Planning Statement [EN010149/APP/7.2.2]** [AS-018] submitted with the Application to account for:

- Revisions to the adopted National Planning Policy Framework ('NPPF'), which were published after submission of the Application;
- Updates to the National Policy Statements('NPSs') for Energy which were published for consultation in April 2025; and
- Government's Clean Power 2030 Action Plan and its relevance to the Proposed Development.

1.1.2. This addendum provides an overview of the updated and draft policy positions and the compliance of the Proposed Development with those positions. The addendum focuses on the revised policy wording of relevance to the Proposed Development only. The current NPSs have effect for the Proposed Development and provide the framework for decision-making with respect to the examination of the Application for a draft development consent order under s104(2)(a) of the Planning Act 2008. However, the transitional arrangements set out in the April 2025 draft NPSs explain that the 2025 amendments *"are potentially capable of being important and relevant considerations in the decision making process. The extent to which they are relevant is a matter for the relevant Secretary of State to consider within the framework* [i.e. s104(2)(d)] *of the Planning Act 2008"* **[Ref 1, Para 1.6.3]**.

1.1.3. The Applicant notes that much of the revised NPSs are consistent with the current (November 2023) versions (as designated in January 2024), which are referred to within the **Planning Statement [EN010149/APP/7.2.2]** [AS-018] and are referenced as the 2024 NPSs in this Addendum.

1.1.4. This Addendum also provides a Summary of the Government's Clean Power 2030 (CP2030) Action Plan (**Appendix 1**), which was also published after submission of the Application. The CP2030 Action Plan sets out the government's view on the pathway to a clean power system in 2030 and the steps needed to get there. The aims of the clean power plan have been embedded into the NPSs in their April 2025 draft form. The plan includes the delivery of large-scale solar development.

1.1.5. This Addendum also provides a response to Action Point 10 from ISH1 – Solar Panel Siting Statement, Flood Zone 3B (**Appendix 2),** where the Applicant explains why it is beneficial and necessary for solar panels to be located in Flood Zone 3B for operational reasons and supporting evidences that demonstrates why instead it is not practicable for solar panels to be located in areas of Flood Zone 1, either within the Order Limits or directly beyond the defined Order Limits.

2. National Policy Statements Updates

2.1.1. In April 2025, the Government opened a consultation on draft updates to NPS EN-1, NPS EN-3 and NPS EN-5 (the '2025 Revisions'). The 2025 Revisions seek to:

- Embed CP2030 policy into the NPSs for Energy;
- Revise Critical National Priority (CNP) wording to assist developers in bringing forward higher quality applications;
- Establish policy guidance for onshore wind developments under the NPSs for Energy;
- Provide updated guidance for offshore wind developments and seek to endorse the recommendations made in the Centralised Strategic Network Plan in NPS EN-5.

2.1.2. It is anticipated that the amended NPSs for Energy will be laid in parliament for approval and be designated before the end of 2025. The Applicant considers that the 2025 Revisions at this stage are of limited relevance to the Secretary of State's decision-making for this Application and in any case the changes proposed in relation to the consideration of solar NSIPs are not material.

2.1.3. Through these updates, the process for delivering major new infrastructure in England and Wales has been strengthened, reinforcing the government's ambition to deliver Clean Power by 2030 and net zero by 2050.

2.1.4. The NPSs relevant to the consideration of Proposed Development are as follows:

- Draft Overarching Energy National Policy Statement for Energy (EN-1) **[Ref 1]**
- Draft National Policy Statement for Renewable Energy Infrastructure (EN-3) **[Ref 2]**
- Draft National Policy Statement for Electricity Networks Infrastructure (EN-5) **[Ref 3]**

2.1.5. For the purposes of this Planning Statement Addendum, it is noted that none of the proposed changes to draft EN-5 impact upon the way in which the Secretary of State should assess the Application, particularly given the small amount of off-site cabling that is required for the Proposed Development. As such, the changes to EN-5 are not considered further in this document.

2.1.6. The NPSs state that for any application accepted for examination before designation of the updated energy NPSs, (such as this Application) the original suite of energy NPS should have effect. The amended energy NPSs will therefore only have effect in relation to those applications for development consent accepted for examination after the designation of the updated energy NPSs. However, any emerging draft NPSs for Energy (or those designated but not having effect) are potentially capable of being important and relevant considerations in the decision-making process. The extent to which they are relevant is a matter for the relevant Secretary of State to consider within the framework of the Planning Act and with regard to the specific circumstances of each development consent order application.

2.1.7. Draft EN-1 Paragraphs 1.6.1 - 1.6.3 set out the transitional arrangements associated with the draft NPSs and states that: "*For any application accepted for examination before the final publication of the approved 2025 amendments, the 2024 suite of NPSs*

should have effect in accordance with the terms of those NPSs ... However, any emerging draft NPSs (or those designated but not yet having effect) are potentially capable of being important and relevant considerations in the decision-making process. The extent to which they are relevant is a matter for the relevant Secretary of State to consider within the framework of the Planning Act 2008 and with regard to the specific circumstances of each Development Consent Order application".

2.1.8. Draft NPS EN-1 incorporates the Government's aim to deliver Clean Power by 2030, replacing previous policy and strategy aims, and confirms that Government's "*objectives for meeting the Clean Power 2030 Mission 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 … Meeting these objectives necessitates a significant amount of new energy infrastructure, both large nationally significant developments and small-scale developments determined at a local level*" [Ref 1, paragraph 2.3.2]. A rapid increase in low-carbon generation, flexibility infrastructure, and electricity transmission infrastructure is needed to achieve the Clean Power target, which is outlined in paragraph 3.3.19 of the draft NPS EN-1, and is consistent with the definition of that target as first published in the CP2030 Action Plan.

2.1.9. The draft NPS EN-1 explains that renewable technologies will form the foundation of the UK's clean power system and that a very significant deployment of those technologies will be needed to deliver the Clean Power target [Ref 1, paragraph 2.3.6], especially as demand for electricity "could more than double by 2050" to reach net zero [Ref 1, paragraph 3.3.3].

2.1.10. Updates in draft NPS EN-1 reflect the re-introduction of onshore wind technology to the definition of energy generating stations that can be nationally significant infrastructure projects (NSIP) under section 15 of the Planning Act 2008 from when the Infrastructure Planning (Onshore Wind and Solar Generation) Order 2025 (the 2025 Order) takes effect, proposed for 31 December 2025.

2.1.11. CNP policy is included in the 2024 NPSs and applies to solar and other low-carbon technologies of nationally significant scale. The updates in Draft NPS EN-1 also reflect the changes in the 2025 Order to increase the threshold for nationally significant solar projects from 50MW to 100MW. The capacity of the Proposed Development exceeds both the current and the future updated threshold for solar generating stations to be an automatic NSIP under the Planning Act 2008.

2.1.12. Further, although the legislation and draft NPS EN-1 still includes Energy from Waste plants as being capable of being nationally significant energy-generating stations, Energy from Waste projects will no longer benefit from CNP policy, as they do not meet the definition of a clean power technology.

2.1.13. Aside from these two proposed policy amendments, CNP policy as included in the 2025 Revisions is unchanged from the 2024 NPSs.

2.1.14. The government is prioritising solar generation projects (which, by definition, are low-carbon generation projects) for their CP2030 Mission, and the 2025 draft updated NPS EN-1 confirms that CNP policy extends to such projects.

2.1.15. Government's Clean Power Capacity Ranges (see Table 1 of Appendix 1 to this Addendum) establish a framework to support the delivery of government's Clean Power target and reflect that "*there is no singular path to achieving clean power, but*

instead, that there are a range of scenarios that could get us there" [Ref 1, paragraph 3.2.3].

2.1.16. Indeed, at paragraph 3.3.22 of draft NPS EN-1, the government goes on to state that the capacity ranges will vary over time: "o*ver time, there will be more clarity on which scenarios are more likely … and allow the pathway to 2030 to be refined over time, helping to determine the precise capacity mix required to deliver the Clean Power 2030 Mission*."

2.1.17. However, government has reconfirmed its view that *"a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar*" [Ref 1, paragraph 3.3.23] and supported by energy storage, which will reduce the costs of the electricity system, increase its reliability and provide services to the electricity system on a local and national basis [Ref 1, paragraphs 3.3.27 & 3.3.28].

2.1.18. Draft NPS EN-1 also clarifies that the government "d*oes 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*" [Ref 1, paragraph 3.2.4]. Indeed, Paragraph 3.2.6 of the same document clarifies that the capacity ranges included in the documents are not intended to propose limits on any new infrastructure that can be consented due to the affordability benefits arising from competition within and between clean power technologies.

2.1.19. Paragraphs 3.2.9 and 3.2.10 of draft NPS EN-1 [Ref 1] confirm that, consistent with the 2024 NPSs, the Secretary of State has determined that substantial weight should be given to the need for projects to come forward for development consent under the Planning Act 2008, and that the Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in the NPSs [Ref 1, paragraphs 3.2.9 & 3.2.10].

2.1.20. Paragraph 5.3.5 of draft NPS EN-1 outlines the strategic planning activity underway for the development of the GB energy system, including the Centralised Strategic Network Plan (CSNP). The CSNP process will enable the delivery of a long-term, holistically designed network plan and will be subject to a Strategic Environmental Assessment. The CSNP would establish the need case and a technological solution for projects that adhere to the recommendations of the CSNP. Endorsement of the CSNP through the NPS, as proposed in draft NPS EN-1, would mean that the need case and technology type for projects adhering to the CSNP recommendations would be established through policy and not further examined during the consenting process [Ref 1 Paragraphs 3.3.78 & 3.3.79].

2.1.21. Draft NPS EN-3 [Ref 2] mirrors the update of policy aims included in draft EN-1 and, similar to the 2024 EN-3, applies to solar generation above the NSIP threshold. Notably, the government states that the UK has huge potential for solar power and that solar energy is at the heart of the CP2030 Mission [Ref 2, paragraphs 2.10.1 & 2.10.2]. Other aspects discussed in Section 4.3 of the Applicant's **Statement of Need [EN01049/APP/7.1]** [APP-135], are consistent between the 2024 EN-3 and the 2025 revised EN-3.

2.1.22. Paragraph 2.10.118 of draft NPS EN-3 states that the transport assessment relating to an application should be vision led defined as "An approach to transport planning based on setting outcomes for a development based on achieving well-designed, sustainable and popular places, and providing the transport solutions to deliver those outcomes as opposed to predicting future demand to provide capacity (often referred to as 'predict and provide')" to manage cumulative impacts.

2.1.23. In summary, the Proposed Development does not give rise to any material change to the planning balance as set out in the **Planning Statement [EN010149/APP/7.2.2]** [AS-018], when considered against the draft NPSs EN-1 and EN-3. There are no new implications arising from the draft NPSs that would alter the assessment or the application of relevant tests by the Secretary of State, as required under the current NPSs.

2.1.24. The existing designated NPSs remain the primary basis for decision-making under section 104(2)(a) of the Planning Act 2008. However, the draft NPSs, currently subject to consultation, may be afforded some weight as a relevant consideration under section 104(2)(d). Notwithstanding this, the policy framework provided by the draft NPSs does not materially alter the planning balance or the conclusions previously reached.

3. National Policy Planning Framework (NPPF)

3.1.1. The Applicant included draft proposed changes to the current NPPF, which were published in July 2024 as part of the **Planning Statement [EN01049/APP/7.2.2]** [AS-018]. Table 4 of the Planning Policy Tables in Appendix 3 to the Planning Statement sets out the Applicant's response to the proposed changes. The Applicant has now validated the draft NPPF July 2024 against the adopted December 2024 NPPF. Table 4 has been updated to reflect the minor changes and paragraph numbers that were submitted as part of this Deadline 1, which has been included in the Planning Statement update.

3.1.2. Following the amendments to the NPPF in December 2024, there is no longer a need to consider food production in land-use planning terms. NPPF 2024 has amended the previous footnote 62 (now footnote 65) to remove the need to consider the availability of agricultural land for food production. The revised NPPF also means there is no longer a need to consider food production from a planning policy perspective.

3.1.3. The amendments to the NPPF described above mean that the Secretary of State should not consider the loss of food production as an important and relevant matter, as this aspect falls outside the overall planning balance and is therefore outside the remit of the decision maker when considering compliance with relevant national planning policy.

3.1.4. The Applicant has considered the most recent policies of the adopted NPPF in preparing the Application. Appendix 3: Policy Compliance Assessment Table 4 of the **Planning Statement [EN01049/APP/7.2.2]** [AS-018] provides detailed evidence of compliance.

3.1.5. In conclusion, the Applicant has fully considered the adopted NPPF (December 2024) and incorporated the relevant updates into the **Planning Statement [EN01049/APP/7.2.2]** [AS-018], including the revised Table 4. The amendments, particularly the removal of the requirement to consider the availability of agricultural land for food production, do not introduce any new material considerations.

3.1.6. Accordingly, there are no material changes to the planning balance as set out in the **Planning Statement [EN01049/APP/7.2.2]** [AS-018]. The Proposed Development remains in accordance with national planning policy, and the recent changes to the NPPF do not alter the assessment or conclusions previously reached.

4. Summary of the Government's Clean Power 2030 Action Plan

4.1.1. Clean Power 2030 is a step in the UK's journey to achieving its energy policy aims of delivering a secure, low-carbon, and low-cost electricity supply for consumers, on the way to achieving net-zero carbon emissions by 2050. The Clean Power 2030 Action Plan [Ref 4] outlines the need for a rapid expansion in the UK's low-carbon electricity generation capacity. It sets out the actions the government proposes to take to deliver that capacity within the required timeframes. Key relevant points from the Government's Clean Power 2030 Action Plan are summarised in Section 3 of Appendix 1 to this Addendum.

4.1.2. Section 3.4 of the **Statement of Need [EN01049/APP/7.1]** [APP-135], explains that the government's proposed approach to achieve net zero shares many similarities with the approach taken by the previous government. Furthermore, there is no inconsistency between the government's approach (including that set out in its Clean Power 2030 Action Plan) and that of the previous government, which would imply a departure from existing policies supporting renewable electricity supplies.

4.1.3. The Government has explained that achieving Clean Power by 2030 is of critical importance, and the Government's Clean Power 2030 Action Plan delivers a mechanism to prioritise near-term actions in support of that aim. However, the need for new clean power does not stop at 2030.

4.1.4. The continued delivery of clean (low-carbon) generation facilities beyond 2030 is necessary to meet future electricity demand growth and achieve essential wider societal carbon savings. It is also important to continue bringing forward schemes if 'Clean Power by 2030' is not achieved, as is also foreseen by the flexibility included in the Government's Clean Power 2030 Action Plan.

5. Planning Balance

5.1.1. The updated draft suite of Energy NPSs, adopted NPPF, and the Government's Clean Power 2030 Action Plan all further highlight the importance of the urgent delivery of new low-carbon and renewable energy infrastructure. Solar is identified as being at the heart of the Government's Clean Power 2030 mission and is a key player in delivering low-cost, effective energy solutions. Coupled with strategic planning and enhanced grid infrastructure in non-traditional locations, the changes proposed to the 2025 revised NPSs signal continued strong governmental support for scaling up renewable energy, aligning with net-zero commitments.

5.1.2. The revised NPSs align energy infrastructure development with the Clean Power 2030 Action Plan, replacing references to previous strategies (e.g., Energy White Paper, Net Zero Strategy) with the government's action plan, which is designed to be responsive to market developments and needs. The revisions reflect the government's strategic framework for delivering a clean energy system, which consists of the Clean Power 2030 Action Plan, the SSEP (Strategic Spatial Energy Plan), and the Centralised Strategic Network Plan (CSNP). The Government has established a Capacity Range of 45–47 GW of solar capacity by 2030, excluding an additional 9 to 10GW of rooftop solar projects which government have estimated could deploy before 2030. At the point of publication of the Clean Power 2030 Action Plan, government estimated installed solar capacity in Great Britain to be 17GW. This solidifies the critical role for large-scale solar in achieving government's net-zero targets and supports the urgent need for the Proposed Development.

5.1.3. The Proposed Development complies with the relevant planning policy and other matters that the Applicant considers may be both important and relevant to the Secretary of State's decision on whether to grant development consent. The Proposed Development is a well-considered and efficiently designed proposal that responds to the urgent and unprecedented need for low-carbon infrastructure development and is sensitive to the local environment. There are no material changes to the planning balance as set out in the Planning Statement **[EN01049/APP/7.2.2]** [AS-018], following consideration of the draft NPSs for Energy and the adopted NPPF (December 2024). It is therefore concluded that Development Consent should be granted.

5.1.4. The Secretary of State's decision for the East Yorkshire Solar Farm on 19th May 2025 adds further insight to the weight to be added to the very substantial and urgent need for new renewable energy generators (as set out in the **Statement of Need [EN01049/APP/7.1]** [APP-135], stating at paragraph 4.30:

"The Secretary of State disagrees with the ExA's conclusion that only moderate positive weight should be ascribed to the need case for the Proposed Development."

5.1.5. The SoS continues at Para 4.34 that: *"The Secretary of State notes that there is a vast array of government policy clearly setting out the very urgent need for low carbon infrastructure including the policies contained within NPS EN-1, and other relevant policy such as The Energy White Paper, Powering Our Net Zero Future, and CP2030 which sets out a pathway to a clean power system."* and therefore that *"the Secretary of State has ascribed substantial positive weight to the urgent need for the Proposed Development."*

5.1.6. It is expected that similar weight would be given to this very urgent need and further supports a planning balance in favour of the Proposed Development.

Reference

[1] UK Gov, draft Overarching National Policy Statement for Energy (EN-1), April 2025

[2] UK Gov, draft National Policy Statement for Renewable Energy Infrastructure (EN-3), April 2025

[3] UK Gov, draft National Policy Statement for Electricity Networks (EN-5), April 2025

[4] UK Gov, Clean Power 2030 Action Plan: A new era of clean electricity. December 2024

Appendix 1 – Clean Power 2030

Application Document Ref: 8.12
Planning Inspectorate Scheme Ref: EN010149

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1. Purpose

1.1.1. Government's Clean Power 2030 Action Plan was published in December 2024. It sets out the pathway to a clean power system by 2030. Following review of the energy NPSs, government drafted updates to those NPSs to bring Clean Power 2030 front and centre as the primary policy that the NPSs enable.

1.1.2. This Appendix to the PS Addendum has been prepared to provide a summary of the government's Clean Power 2030 Action Plan [Ref 1] and to discuss the plan in relation to the Springwell Solar Farm DCO application (the DCO).

1.1.3. This Appendix to the PS Addendum addresses the following points:

- The government's definition of 'Clean Power 2030';
- Government's capacity ranges, which provide a framework for the prioritisation of connection offers for projects;
- Connection Reform and the Proposed Development.

1.1.4. This Appendix to the PS Addendum also concludes that, in relation to Connection Reform:

- The Proposed Development is 'ready'.
- The Proposed Development is awaiting confirmation on 'strategic alignment'.
- If not 'strategically aligned' the Proposed Development is still needed and would be reassessed for 'strategic alignment' at a later date, potentially post consent.

2. Context

2.1.1. In December 2024, the Prime Minister reconfirmed the government's mission to make Britain a clean energy superpower and government published the Clean Power 2030 Action Plan.

2.1.2. The government has taken onboard NESO's advice to achieve *"at least 95% clean power by 2030, while accelerating the UK to net zero"* [Ref 1, p6] thereby staying on track to "secure our energy supply with home-grown, clean power" [Ref 1, p40].

2.1.3. Clean Power 2030 is a step in the UK's journey to achieving its energy policy aims of delivering a secure, low-carbon and low-cost electricity supply for consumers on the way to delivering net zero carbon emissions by 2050. This plan explains the need for a rapid expansion in the UK's low-carbon electricity generation capacity and sets out the actions the government proposes to take to deliver that capacity against the timeframes required. This document summarises the key relevant points from government's Clean Power 2030 Action Plan in Section 3 below.

2.1.4. Section 3.4 of the **Statement of Need [EN010149/APP/7.1]** [APP-0135] explains that the government's proposed approach to achieve net zero shares many similarities with the approach taken by the previous government. Further, that there is nothing inconsistent between the government's approach and the approach taken by the previous government which would mean a move away from existing policies in support of renewable electricity supplies.

2.1.5. Government has explained that achieving Clean Power by 2030 is of critical importance and the government's Clean Power 2030 Action Plan delivers a mechanism to prioritise near-term actions in support of that aim. However, the need for new clean power does not stop at 2030.

2.1.6. The continued delivery of low-carbon generation facilities beyond 2030 is necessary to meet future electricity demand growth and achieve essential wider societal carbon savings. It is also important to continue to bring forward schemes in the event that 'Clean Power by 2030' is not achieved, as is also foreseen by flexibility included in the government's Clean Power 2030 Action Plan.

3. The Clean Power 2030 Action Plan

3.1.1. Government published their Clean Power 2030 Action Plan in December 2024. The plan states that delivering Clean Power 2030:

"Paves the way to decarbonising the wider economy by 2050 as we pursue the electrification of heat in buildings, transport, and industry. By 2050, annual electricity demand is likely to at least double. Clean power by 2030 prepares us for the rapid growth in power demand expected over the 2030s and 40s" [Ref 2, p11].

3.1.2. Further, the plan reiterates the energy security and affordability benefits of pursuing a low-carbon future:

"In an era of heightened geopolitical risk, switching fossil fuelled generation for homegrown clean energy from renewables and other clean technologies offers us security that fossil fuels simply cannot provide.

It is crucial we complement renewables with flexible capacity to ensure we can deliver clean power no matter the weather" [Ref 2, p21].

3.1.3. However, government also states that *"to get this right we need to act – and act quickly – because 6 years is a short time in building energy infrastructure"* [Ref 2, p18].

3.1.4. Government's definition of Clean Power 2030 is that:

- Clean sources produce at least as much power as Great Britain consumes in total (In 2023, clean sources produced 56% of GB consumption, [Ref 2, p26])
- Clean sources produce at least 95% of Great Britain's generation (In 2023, clean sources produced 60% of GB's generation, [Ref 2, p26])

3.1.5. However, government *"will aim to deliver above this ambition where the system and consumer benefits align so that potential challenges in some areas of clean power delivery can be compensated by deployment elsewhere*" [Ref 2, p25].

3.1.6. In November 2024, following a request from government, NESO provided their input into the development of the government's plan for 'Clean Power by 2030' by publishing their Clean Power 2030 report [Ref 3].

3.1.7. To deliver above the government's Clean Power 2030 ambition, government *"accepts the NESO advice on the infrastructure required for 2030 – decisions are required now to ensure the grid needed for the system in 2030 can be put in place"* [Ref 2, p31] and recognises that the grid connections process needs reform and the queue to connect must be reduced to *"prioritise projects needed for 2030, while maintain[ing] a robust pipeline [of projects] beyond 2030"* [Ref 2, p11].

3.1.8. Table 1 sets out government's 'Clean Power Capacity Range' compared to its view of installed capacity (GW) in December 2024 for major generation technologies.

3.1.9. The Capacity Range provides a framework for the prioritisation of offers for projects which:

- Align with NESO's advice on connections which are deliverable by 2030, and
- Can demonstrate that they have the means to deliver.

3.1.10. Importantly, government states that NESO's engagement with Distribution Network Operators indicates that an additional 9 to 10GW of rooftop solar projects could deploy before 2030. It is therefore possible that the 2030 Clean Power solar capacity range of 45 to 47GW could yield around 54 to 57GW of installed capacity by 2030, subject to solar PV pipeline of rooftop solar projects [2, Connections Reform Annex, Table 1, Footnote 10].

Table 1: DESNZ 'Clean Power Capacity Range', and current installed capacity (GW) [Ref 2, Table 1 & Connections Reform Annex, Table 1]

Technology	Current Installed Capacity (*)	DESNZ 2030 'Clean Power Capacity Range'	2035 FES-derived Capacity Range
Offshore Wind	15	43 – 50	72 – 89
Onshore Wind	14	27 – 29	35 – 37
Solar	17	45 – 47	45 – 69
Nuclear	6	3 – 4	4 – 6
Low Carbon Dispatchable Power	4	2 – 7	Up to 25
Unabated Gas	36	35	NA
Batteries	5	23 – 27	24 – 29
Other flexible assets	15	26 – 32	51 – 63

(*) Government's view of the publicly available data for Great Britain at the point of publication of Clean Power 2030 Action Plan

3.1.11. By establishing 'Clean Power Capacity Ranges' for key technologies, government has:

"set out national pathway figures for the capacity which should be prioritised for all technologies, and further regional breakdowns for the capacity which should be prioritised for solar, batteries and onshore wind.

These FES (Future Energy Scenarios) derived ranges do not constitute a government pathway, but rather an established, public basis through which to provide longer-term certainty on connections" [Ref 2, Connections Reform Annex, p5].

3.1.12. Critically, the Clean Power 2030 Action Plan does not seek to limit, constrain or cap the capacity of low carbon generation assets which will be delivered to meet net zero. Indeed, quite the opposite is true, and the Clean Power 2030 Action Plan seeks to de-clutter the front end of the connection queue to ensure that a sufficient capacity of low carbon generation assets are able to connect in suitable timeframes.

3.1.13. Government state that *"Whilst the 'Clean Power Capacity Range' provides a foundation to guide rapid policy development and focus delivery, the scenarios developed now cannot be exhaustive or definitive, and it is only right that some optionality is retained"* [Ref 2, p31].

3.1.14. This is important because development pipelines experience attrition and the roll out of some technologies may be quicker than others. Therefore to ensure that a sufficient capacity of low carbon generation assets is delivered, a greater capacity of low carbon technologies is required to come forwards in development pipelines. Section 6.3 of the **Statement of Need [EN010149/APP/7.1]** [APP-0135] provides more information on pipeline attrition in the UK, including through the Contracts for Difference (CfD) stage of development.

3.1.15. Even at the late stage of CfD contract award, competition between schemes is required to deliver value for money to consumers. Competition requires a greater capacity of low carbon projects to progress through planning than are required to deliver government's targets.

3.1.16. These factors combine to lead to the conclusion that government is *"expecting an increase in planning applications with the Clean Power 2030 target"* [2, p55], and indeed planning applications will need to continue to be made if the Clean Power 2030 target is to be met.

4. Connection Reform Proposals

4.1. Introduction

4.1.1. A summary of the Connections Action Plan can be found in Section 3.13 of the **Statement of Need [EN010149/APP/7.1]** [APP-0135].

4.1.2. NESO have developed proposals to reform the connections queue [Ref 4], these were published in November 2024. At the time of submission of this report, Ofgem (the relevant authority) has approved the proposals and NESO are now developing and implementing their reforms with further information due to be published from Q3 2025.

4.1.3. In essence, NESO are moving from a 'Connect and manage' development-led prioritisation methodology to a 'first-ready-first-connected' methodology which aims to connect low-carbon technologies to the grid more quickly than the existing method.

4.1.4. Following a decision on the Connection Reform proposals, NESO intend to apply their methodology to the current connection queue in a process called 'Gate 2 to Whole Queue'. The Connection Reform proposals will then be applied under an enduring process to new and existing projects.

4.1.5. Projects which are already in the connections queue, which demonstrate that they are 'ready' and are 'strategically aligned' may receive a 'Gate 2' connection offer to connect to the grid at a specified connection point and by a specified date. NESO do not expect 'Gate 2' dates to be any later than those already provided by existing connection agreements.

4.2. Readiness Criteria

4.2.1. To demonstrate that a scheme is 'Ready' to be eligible to be considered for a 'Gate 2' connection offer, the scheme must:

- Have secured land rights for a minimum acreage, related to the capacity of the scheme and the proposed technology, or;
- Submission of (and validation of) application for planning consent for projects following the Development Consent Order (DCO) process.

4.3. Strategic Alignment Criteria

4.3.1. NESO will assess the 'Strategic Alignment' of a scheme against the regional capacities set out in the Clean Power 2030 Action Plan Connections Reform Annex [Ref 2, Connections Reform Annex], reproduced as Table 1 in this document. The annex sets out regional capacities broken down by technology-type, transmission/distribution system and region. Projects will be assessed against the relevant 2030 and 2031-35 capacities using the process outlined in NESOs Connection Network Design Methodology.

4.3.2. Projects that are 'Ready' and align with the regional capacities will receive a gate 2 offer for a connection either in phase 1 (2026-2030), or phase 2 2031-2035.

4.3.3. NESO projects which do not receive a 'Gate 2' offer will receive a 'Gate 1' connection offer to connect to the grid at an indicative connection point and by an indicative date.

4.3.4. Projects with 'Gate 1' offers will be eligible to be considered for a 'Gate 2' offer when readiness criteria have been met, subject to also meeting the 'Strategic Alignment' criteria.

4.3.5. The Clean Power 2030 Action Plan also paves the way for new strategic plans for development of the GB energy system. NESO has been tasked with developing a Centralised Strategic Network Plan (CSNP), a national-level Strategic Spatial Energy Plan (SSEP), and eleven Regional Energy Strategic Plans (RESPs). Together these plans will provide a "blueprint of energy requirements, setting out how energy needs will change, what this means for infrastructure needs and indicating critical areas for strategic investment" [Ref 5]. NESO started to develop the methodologies to be applied in the CSNP, SSEP and RESPs in 2025. These methodologies will proceed through a number of reviews and consultations prior to being finalised and coming into effect in the first issued plans in or around 2027.

4.4. Strategic Alignment Protections

4.4.1. In their Gate 2 Criteria Methodology, NESO has set out a series of protections from the 'Strategic Alignment' element of the Gate 2 criteria [Ref 6]. These are broadly as follows:

- Clause 1: Projects connecting by the end of 2026
- Clause 2: Projects which are significantly progressed, having secured planning or hold a live CfD or CM contract
- Clause 3: Projects that obtain planning after the closure of the 'Gate 2 to whole queue' application window

4.4.2. Clause 1 and 2 offer full protection from the 'Strategic Alignment' element of the 'Gate 2 to whole queue' exercise. Clause 3 offers a route to protection in a future window once planning consent has been obtained, provided the planning application was submitted prior to the closure of the 'Gate 2 to whole queue' application window and the project does not breach the GB-wide capacity for its technology.

5. Connection Reform and the Proposed Development

5.1. Introduction

5.1.1. The Proposed Development holds a connection offer to connect at a proposed new substation called Navenby. The current connection offer provides 400MW of connection capacity in October 2029 and a further 400MW of connection capacity in October 2030.

5.2. Readiness Criteria

5.2.1. Following the Applicant's submission to the Planning Inspectorate in November 2024, the Application was accepted in Examination by the Planning Inspectorate on 18th December 2024.

5.2.2. The Applicant has also secured land rights for the minimum acreage, related to the capacity of the scheme and the proposed technology.

5.2.3. The proposed Development therefore meets the Readiness Criteria required for it to be considered for Strategic Alignment under the Gate 2 to Whole Queue process.

5.3. Strategic Alignment

5.3.1. The Proposed Development proposes to connect to the National Electricity Transmission System (NETS) at a new substation at Navenby. Navenby will be located between Bicker Fen to the south east and West Burton to the north. Staythorpe is located to the west although there is no direct connection between Navenby and Staythorpe.

5.3.2. The Applicant's analysis suggests that Navenby is likely to be in Transmission network region code T5 ('Midlands'), although the Applicant notes the optionality retained in the Clean Power 2030 Action Plan for regional capacity ranges to be reallocated by NESO across adjacent regions as part of the Strategic Alignment process.

5.3.3. The Regional capacity breakdown for transmission connected solar in Zone T5 (Midlands) is currently 4,000MW by 2030 with a further 4,400MW by 2030 in adjoining zones T4, T6 and T8.

5.3.4. In April 2025, government amalgamated the solar distribution and transmission allocations for 2031-35 stating that "This will ensure that the most well-developed solar projects across both Transmission and Distribution are allocated the capacity available in their region" [Ref 7]. The Regional Capacity breakdown for solar in the Midlands in 2035 is 13,700MW with a further 27,300MW by 2035 in adjoining zones T4, T6 and T8. [Ref 2, Connections Reform Annex, Table 2 and Table 6].

5.3.5. The Regional capacity breakdown for transmission connected battery storage in Zone T5 (Midlands) is currently 1,300MW by 2030, with a further 5,600MW by 2030 in adjoining zones T4, T6 and T8. 2035 Battery storage regional capacity breakdowns in Transmission region codes T4, T5, T6 and T8 are the same as those in 2030. [Ref 2, Connections Reform Annex, Table 2].

5.3.6. The Applicant also notes the optionality retained by government in the setting of the Clean Power capacity ranges [Ref 2, p31].

5.3.7. The regional capacity breakdowns contained in the Clean Power 2030 Action Plan [Ref 2, Connections Reform Annex Table 2 and Table 6] are higher than the total national capacity of solar or solar plus storage schemes for which, at the time of writing, applications for Development Consent have been submitted to and accepted as valid by the Planning Inspectorate [Ref 8]. Based on current available data, the Applicant therefore considers that the Proposed Development is likely to be classified as 'Strategically Aligned' and as such is relevant for Clean Power 2030 and is likely to receive a prioritised Grid Connection Agreement as part of the 'Gate 2 to Whole Queue' process to be carried out now that authority approval of the Connections Reform process has been granted.

5.3.8. If Springwell Solar Farm does not receive a 'Gate 2' connection offer, the proposal will be eligible for Clause 3 Protection. This is because it holds an existing Connection Agreement and meets the Gate 2 Readiness Criteria. This means that if a Development Consent Order is made, Springwell would meet the Strategic Alignment Criteria if by doing so, the total capacity of solar and of storage projects in the pipeline with 'Gate 2' offers does not exceed the total national capacity range set out in Table 1 for each capacity.

5.3.9. In doing so, Springwell would receive a Gate 2 connection offer.

5.3.10. However, if the national pipeline of solar projects and/or storage projects was oversubscribed prior to a DCO being granted for Springwell, the Proposed Development would be eligible to reapply for a 'Gate 2' connection offer which may be granted when the project is strategically aligned at a future date.

6. References

[1] UK Gov, Plan for change, Milestones for a mission-led government

[2] UK Gov, Clean Power 2030 Action Plan: A new era of clean electricity

[3] NESO, Clean Power 2030, Advice on achieving clean power for Great Britain by 2030, available online: https://www.neso.energy/publications/clean-power-2030, including the April 2025 updated Connections Reform Annex, also available online: https://assets.publishing.service.gov.uk/media/67f3b417d3f1efd2ce2ab8a5/clean-power-2030-action-plan-connections-reform-annex-update.pdf

[4] UK Gov, draft Overarching National Policy Statement for Energy (EN-1), April 2025

[5] UK Gov, draft National Policy Statement for Renewable Energy Infrastructure (EN-3), April 2025

[6] UK Gov, draft National Policy Statement for Electricity Networks (EN-5), April 2025

[4] NESO, Connections Reform Consultation documents, available online: [redacted]

[5] Ofgem, Decision on the Regional Energy Strategic Plan Policy Framework, available online: https://www.ofgem.gov.uk/sites/default/files/2025-04/RESP-policy-framework-decision.pdf

[6] NESO, Guidance for the Queue Management process for Transmission Customers, available online at [redacted]

[7] UK Gov, DESNZ letter to NESO, April 2025, available online: https://assets.publishing.service.gov.uk/media/67f4025f53505b2ca44eff5f/clean-power-2030-action-plan-solar-capacity-update-letter-7-april.pdf

[8] Planning Authority, Project list, available online, https://national-infrastructure-consenting.planninginspectorate.gov.uk/project-search

Appendix 2 - Solar Panel Siting Statement

Application Document Ref: 8.12
Planning Inspectorate Scheme Ref: EN010149

Table of Contents

1. Introduction

1.1. Purpose of this Report

1.1.1. This document provides a response to Action Point 10 from ISH1 which is for the Applicant to provide a written submission to explain why it is beneficial and necessary for solar panels to be located in Flood Zone 3B for operational reasons and a map with supporting evidence that demonstrates why instead it is not practicable for solar panels to be located in areas of Flood Zone 1, either within the Order Limits or directly beyond the defined Order Limits.

1.2. Site Selection Principles

1.2.1. The Applicant undertook a site selection process to identify the location of the Proposed Development, taking into consideration a range of planning, environmental, and operational factors. In general terms, there is no legal or policy requirement to demonstrate that the Proposed Development is the best location for a solar farm. However, it is an appropriate location for a solar farm, and there are certain policy preferences, for instance, prioritising previously developed land over greenfield land and lower-quality agricultural land over higher-quality agricultural land. This report explains the process undertaken by the Applicant in considering these important factors.

1.2.2. There are also certain legislative and policy tests regarding the consideration of alternative sites, for instance where there would be an adverse effect on the integrity of a European protected site, which is not engaged in this case, the consideration of alternative land where there are areas of high flood risk, which is assessed within this application, and the consideration of alternatives where land is proposed to be acquired compulsorily. In this case, the Applicant aims to secure the principal land parcels to deliver the solar farm through a voluntary agreement. However, compulsory acquisition powers are still being sought to ensure there is no impediment to delivery. All of this is set out in **Planning Statement Appendix 1 - Site Selection Report [EN010149/APP/7.2.2]** [AS-018] and the layout of the Proposed Development and the extent of the Order Limits have undergone several stages of engagement, consultation and design iteration, which are described in **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010149/APP/6.1]** [APP-044].

1.2.3. The Applicant undertook a systematic process to determine suitable sites for the Proposed Development, which was framed at a macro level by principles of good design. This is explained in the Planning Statement at paragraphs 8.1.26-8.1.36 which set out how the Applicant has met policy in Part 4.3 of NPS EN-1 and Part 2.3 of National Policy Statement for Renewable Energy Infrastructure EN-3 (November 2023) (NPS EN-3) with regard to alternatives and site selection. This included consideration of a range of technical, environmental, and economic factors based on the site selection principles outlined in NPS EN-3. These are set out in the **Site Selection Report [EN010149/APP/7.2.2]** [AS-018]**,** together with a summary of the Proposed Development's approach to them. A summary of the key reasons why the Site was selected and how consideration of good design has informed it is provided within the **Design Approach Document [EN010149/APP/7.3.2].**

1.2.4. Additional details on the evolution of the design of the Proposed Development are provided in the **Design Approach Document [EN010149/APP/7.3.2]** and the **Consultation Report [EN010149/APP/5.1]** [APP-019], which explains how the Proposed Development has evolved with regard to responses received from consultation, in particular section 6.5**.** This explains, for instance, the significant feedback received from the local community on setting back solar from existing homes.

2. Summary of Site Selection Process and the Sequential Test

2.1. Summary Site Selection Process

2.1.1. The Applicant has set out its approach to site selection in the **Site Selection Report [EN010149/APP/7.2.2]** [AS-018]. In determining a suitable location for the Proposed Development, the Applicant sought to develop a single new solar PV Nationally Significant Infrastructure Project (NSIP) generating a minimum of 250 - 500MW (based on a site comprising a minimum of 1,000 acres (405 hectares)) which:

- Would contribute to meeting the UK's urgent need for low carbon energy generation;
- Would be in close proximity to an available grid connection or part of the transmission network in which capacity exists;
- Would avoid impacts on sensitive landscapes and environments as far as practicable;
- Would be readily accessible from existing strategic road network to facilitate construction access;
- Would be delivered on land which could be acquired voluntarily thereby avoiding the need for large scale compulsory acquisition.

2.1.2. This approach is set out in paragraphs 3.1.5 to 3.3.38 of the Planning Statement.

2.1.3. The Applicant identified five suitable landholdings which performed well against the search criteria set out in paragraph 3.2.8 of the **Planning Statement [EN010149/APP/7.2.2]** [AS-018] which were:

- Grid Security (capacity within the OHL line)
- Proximity of OHL to site (no further than 3km from OHL)
- Accessibility (readily accessible from major roads with appropriate connections to local road network)
- Available acreage within landholding (minimum 1,000 acres (405 hectares)
- ALC grade (preference for non-agricultural or lower grade ALC)
- Flood Zone (preference for Flood Zone 1)
- Cultural heritage assets (avoidance of statutory assets)
- Visual Impact (capability of solar PV development to be broken up/hidden in landscape)

2.1.4. In terms of meeting the first two criteria, the Applicant sought to identify sites within a 3km area of search either side of the West Burton to Bicker Fen and Cottam to Eaton Socon OHLs.

2.1.5. In identifying suitable landholdings, as set out in the Site Selection Report, the Applicant had a preference for as few landowners as possible and initially sought sites with a maximum of two principal landowners (for the solar PV development) as

this would minimise the use of compulsory acquisition powers, as is required under the legislative and policy framework and to enable effective land use management. As noted in the **Written Summary of Oral Submissions at Issue Specific Hearing 1 [EN010149/APP/8.16]** this was an ambition rather than a hard and fast rule and the Applicant also used their judgement of developing solar farms to identify suitable areas of search. Their view was that the Blankney Estate stood out from an early stage as an appropriate site for a utility scale solar farm, it had favourable topography, was contiguous with the OHL, had good accessibility, had relatively limited environmental constraints and was suitably sized to be able to develop a design which was appropriate to its context. As a suitable site was found close to the OHL which had favourable planning and environmental characteristics with one principal landowner, the Applicant focussed its development proposals on this location.

2.1.6. The Applicant also had a preference for contiguous landholdings, rather than more, smaller parcels. This was both to ease construction and deliverability, which is important given the pressing need for solar to be delivered as soon as possible to meet Clean Power by 2030 and Net Zero by 2050. Larger landholdings also had the benefit of offering more opportunity for flexibility in detailed siting of solar panels, associated infrastructure and areas of land for enhancement and mitigation and good land use management.

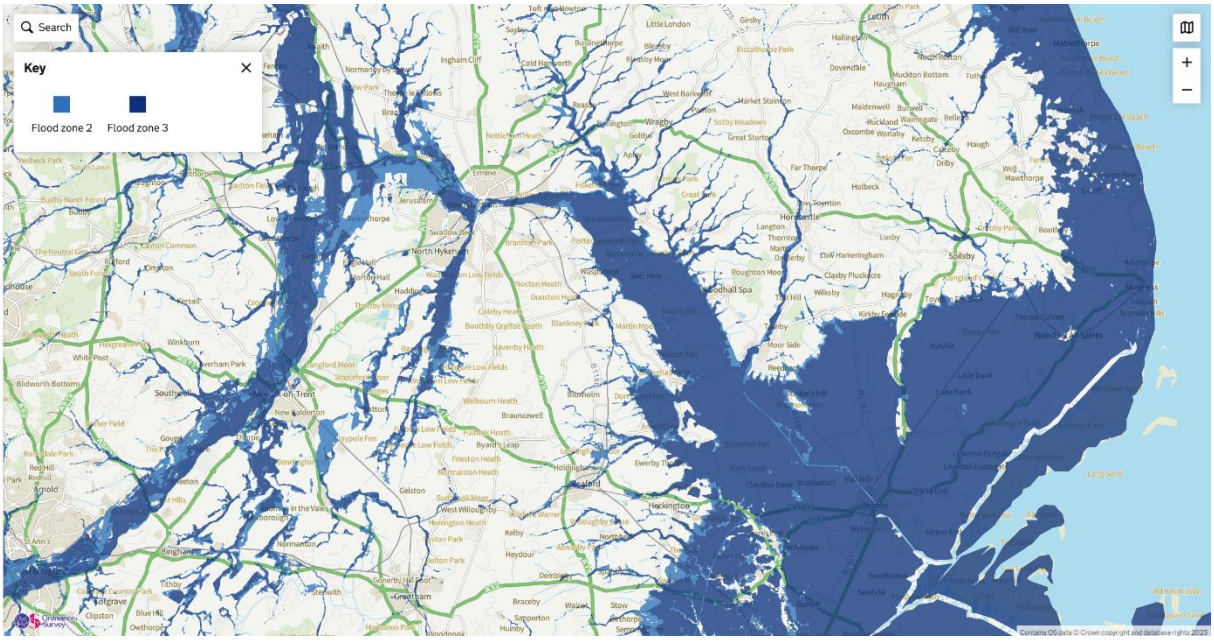
2.1.7. In considering planning and environmental criteria (e.g. ALC, Flood Zone, cultural heritage assets and visual impact), this was inevitably a balancing exercise as to what makes a suitable site, weighing up a number of varying factors. Whilst sites in Flood Zone 1 were preferred on the basis of lower flood risk, sites in Flood Zones 2 and 3 were not ruled out on the basis that there is a technical solution to allow solar to be safely accommodated in Flood Zones 2 and 3, without increasing flood risk elsewhere, as explained in the **Flood Risk Assessment [EN010149/APP/7.16.3]**, and to the satisfaction of the Environment Agency. Whilst the Applicant was mindful of needing to satisfy the Sequential Test without reference to technical solutions, as is demonstrated below there were no suitable sites which were readily available solely within Flood Zone 1. Therefore, it was appropriate to keep these options in the process so that they could be balanced to determine their suitability for solar and against other sustainable development objectives in the consideration of alternatives under the various legislative and policy test requirements.

2.2. Sequential Test

2.2.1. In carrying out its site selection process, the Applicant undertook the sequential test, both at a macro level when considering alternative sites (i.e. the selection of land in the Blankney Estate) and when selecting areas that were suitable for solar panels and related infrastructure, within the land available to the Applicant in the Blankney Estate.

2.2.2. This is set out in the **Planning Statement [EN010149/APP/7.2.2]** [AS-018] at paragraphs 8.5.6 to 8.5.13. As explained in these paragraphs, all five of the sites considered by the Applicant which met the search criteria had similar characteristics in terms of flood risk, i.e. they were mainly in Flood Zone 1, with small areas in Flood Zones 2 and 3. In addition, by focussing on sites closer to the OHL, the Applicant avoided the larger areas of flood risk to the west and east (shown at a high level on Figure 1 – extract from Environment Agency flood risk mapping).

Figure 1 – Extract from EA mapping showing Flood Zones 2 and 3 relative to the broad site location



2.2.3. Overarching National Policy Statement for Energy EN-1 November 2023 (NPS EN-1) recognises in the application of the sequential test that alternative sites must be reasonably available, lower risk and appropriate for the proposed development, accounting for wider sustainable development objectives, where the application of relevant policies would provide a clear reason for refusing development in any alternative locations identified. In applying the sequential test, sites must therefore be both reasonably available and suitable for the proposed development.

2.2.4. The Applicant identified five landholdings which were potentially suitable for a utility scale solar farm and met its search criteria. All of these were predominantly in Flood Zone 1 with small areas in Flood Zones 2 and 3. The Applicant was unable to locate sites solely within Flood Zone 1 that would be suitable (in particular, when applying its search criteria set out above in relation to suitable location and appropriateness for solar). Similarly, of the 5 landholdings identified, none was solely in Flood Zones 1 and 2 only - all included small areas of Flood Zones 2 and 3. As shown in Figure 1, the OHL is located between the Fens and the River Trent and moving further west or east encounters much higher areas of flood risk.

2.2.5. As set out in the **Site Selection Report [EN010149/APP/7.2.2]** [AS-018], early discussions with the Blankney Estate were positive and indicated a willing landowner with available land. Against the background of an urgent need to deliver renewable energy, the Applicant therefore focussed on this land, rather than furthering discussions with owners of the other landholdings, which may not have been available within the same time period. There are therefore no reasonably available lower risk sites at a macro site selection level that would be appropriate for the proposed development, accounting for wider sustainable development objectives.

2.3. Application of the Sequential Test at detailed Site Selection

2.3.1. The Applicant also took into account flood risk when considering suitable sites for solar and associated infrastructure within the land available to it on the Blankney Estate. This was however balanced against other planning and environmental factors, when considering its suitability for solar and associated infrastructure, including wider sustainable development objectives.

2.3.2. In considering the land that was available to the Applicant, the Applicant's aim was to reach voluntary agreement with the landowner for the principal solar PV generating station areas, to reduce the need for compulsory acquisition in accordance with policy requirements. It therefore focussed its assessment of alternative areas for solar on the land within the Blankney Estate landholding which the landowner had identified was available and which was potentially suitable for solar in terms of topography, field size and configuration, and orientation. High value, productive farmland was not included in the land that was made available to the Applicant because the estate wished to continue to farm these areas and for much of these areas had invested heavily in irrigation systems. Table 1 therefore doesn't include land within the Blankney Estate outside of the Order Limits which was not available to the Applicant and therefore didn't meet the first limb of the sequential test.

2.3.3. Table 1 sets out land identified by the Blankney Estate as being available to the Applicant, which includes the land within the Order Limits and some land immediately adjoining it. Those sites at lower risk of flooding were however not suitable for solar for other planning and environmental reasons, as set out in Table 1.

2.3.4. Therefore, in order to maximise the grid connection, the Applicant includ small areas of solar in Flood Zones 2 and 3, at the edge of field margins. If these areas were not proposed for solar, they are too small to be productively farmed and so the Proposed Development would not be making the best use of land for renewable energy, consistent with the urgent need identified in NPS EN-1 and EN-3, or with the National Planning Policy Framework (NPPF) (paragraph 124) in terms of making the most effective use of land. To put this into context, the area of solar in Flood Zones 2 and 3 is 6.39ha in Flood Zone 3 and a further 4.04ha in Flood Zone 2. The reasons each of the fields within or adjoining the Order Limits were discounted is explained and set out in greater detail in Table 1.

3. Why it is not possible to locate solar panels in areas of Flood Zone 1?

3.1.1. Table 1 sets out why other land within or immediately adjacent to the Order Limits is not suitable for solar, having regard to planning and environmental considerations, the need to apply the mitigation hierarchy (alongside other policy requirements in the Energy NPSs) and, where applicable, wider sustainable development objectives. As explained above, there is no other land which was available to the Applicant to locate solar panels and associated infrastructure on.

3.1.2. There is therefore no land that is both available and suitable for solar panels within the Order Limits (in addition to what is already utilised) or immediately adjacent to it, which is at lower risk of flooding. The sequential test requires land to be both available and suitable, and so therefore the sequential test is passed.

3.1.3. The fields considered below were all of the land within and adjacent to the Order Limits with a lower flood risk than the areas proposed for Solar PV development in Flood Zones 2 and 3 and identified as available to the Applicant by the Blankney Estate.

3.1.4. The table below summarises the main reason(s) for discounting Solar PV development from areas of Flood Zone 1 based on the constraints of individual field parcels. Field parcels C3 and C4 also fall partly in Flood Zones 2 and 3 and are therefore not sequentially preferable to the land proposed for solar within the Order Limits, but have been included for completeness. It should be noted that the final design of the Proposed Development is based upon a broader understanding of the opportunities and constraints and includes consideration of potential cumulative impacts, stakeholder engagement, and consultation feedback, which are not necessarily captured by the table below. For example, where Solar PV development has been discounted to prevent overbearing impacts on certain communities or Public Rights of Way. This accords with the criteria for good design set out in NPS EN-1 and includes the use of project-level design principles (Project Principles) to guide decision making as described in the **Design Approach Document [EN010149/APP/7.3.2]**.

3.1.5. Greater detail on the reasonable alternatives that have been considered for the placement of Solar PV development are set out in **ES Volume 1, Chapter 4: Reasonable Alternatives Considered [EN010149/APP/6.1]** [APP-044]**.**

Table 1 – Reasons for discounting Solar PV development

Field Reference	Location in relation to Order Limits	Reason(s) for discounting for Solar PV development
Springwell East		
By01	Outside Order Limits	Field comprises high quality grassland that is suitable for reptiles.
By02	Outside Order Limits	Field physically constrained by the presence of existing overhead utility lines.
By05	Outside Order Limits	Field comprises majority Grade 1 ALC land.

Field Reference	Location in relation to Order Limits	Reason(s) for discounting for Solar PV development
		Potential for residential amenity impacts and landscape and visual impacts on residential property.
By12	Outside Order Limits	Field has high archaeological potential. Responds to feedback received at consultation to reduced impacts on local property.
By13	Outside Order Limits	Potential for residential amenity impacts and landscape and visual impacts on residential property.
By16	Outside Order Limits	Potential for landscape and visual impacts on users of local PRoW.
By18	Within Order Limits	Field comprises solely Grade 2 ALC land.
By20	Within Order Limits	Potential for residential amenity impacts and landscape and visual impacts on residential property.
By27	Within Order Limits	Field comprises solely Grade 1 and 2 ALC land.
Lf02	Within Order Limits	Potential for residential amenity impacts and landscape and visual impacts on residential property and users of local PRoW.
Lf03	Within Order Limits	Field comprises majority Grade 2 ALC land.
Lf09	Outside Order Limits	Field comprises majority Grade 1 and 2 ALC land. Potential for residential amenity impacts and landscape and visual impacts on residential property.
Lf10	Outside Order Limits	Field comprises majority Grade 2 ALC land.
Lf12	Outside Order Limits	Field has high archaeological potential. Potential for impacts on the landscape character and visual setting of Scopwick, the Scopwick Conservation Area, users of local PRoWs (including the Spires and Steeples Trail and Trundle Lane) and the residential amenity of local properties.
Lf13	Outside Order Limits	Potential for impacts on the landscape character and visual setting of Scopwick, the Scopwick Conservation Area, users of local PRoWs (including the Spires and Steeples Trail and Trundle Lane) and the residential amenity of local properties.
Lf16	Outside Order Limits	Potential for impacts on the landscape character and visual setting of Scopwick, the Scopwick Conservation Area and the residential amenity of local properties.

Field Reference	Location in relation to Order Limits	Reason(s) for discounting for Solar PV development
Md02	Within Order Limits	Responds to feedback received at consultation to increase the distance between the Proposed Development and Scopwick and to provide a visual break and reduce the landscape and visual impact along local PRoW (including the Spires and Steeples Trail and Trundle Lane).
Md03	Within Order Limits	Potential for impacts on the landscape character and visual settings towards Blankney and Scopwick from local PRoW, alongside views of Scopwick Church from the B1188. Potential for landscape and visual impacts on users of local PRoWs (including the Spires and Steeples Trail and Stepping Out Walks).
Md04	Within Order Limits	Field has high archaeological potential Potential for impacts on the landscape character and visual settings of Blankney and Scopwick from the PRoW, alongside views of Scopwick Church from the B1188. Potential for landscape and visual impacts on users of local PRoWs (including the Spires and Steeples Trail and Stepping Out Walks).
Md05	Within Order Limits	Potential for impacts on the residential amenity of local properties and on users of local PRoWs. Potential for landscape and visual impacts on Scopwick Cemetery and the adjacent children's playground and communal open space.
Md06	Within Order Limits (partially)	Potential for impacts on the landscape character and visual setting of Scopwick, the Scopwick Conservation Area, users of local PRoWs (including the Spires and Steeples Trail and Trundle Lane) and the residential amenity of local properties. Potential for landscape and visual impacts on Scopwick Cemetery and the adjacent children's playground and communal open space.
C1	Outside Order Limits	Potential for impacts on the landscape character and visual setting of Blankney village, the Blankney Conservation Area and users of local PRoW (the Spires and Steeples Trail).
C2	Outside Order Limits	Field comprises majority Grade 2 ALC land.

Field Reference	Location in relation to Order Limits	Reason(s) for discounting for Solar PV development
		Potential for impacts on the landscape character and visual setting of Blankney village, the Blankney Conservation Area and users of local PRoW (the Spires and Steeples Trail).
C3	Outside Order Limits	Potential for impacts on the landscape character and visual setting of Blankney village and the Blankney Conservation Area. Field located within an area of Flood Zone 2 and 3, therefore not sequentially preferable.
C4	Outside Order Limits	Field comprises majority Grade 2 ALC land. Field located within an area of Flood Zone 2 and 3, therefore not sequentially preferable. Potential for landscape and visual impacts on users of local PRoWs.
C5	Outside Order Limits	Located adjacent to the Avro Lancaster memorial. Potential for landscape and visual impacts on users of local PRoWs.
C7	Within Order Limits (partially)	Field has high archaeological potential. Potential for impacts on the landscape character and visual settings towards Blankney and Scopwick from local PRoW, alongside views of Scopwick Church from the B1188. Potential for landscape and visual impacts on users of local PRoWs (including the Spires and Steeples Trail and Stepping Out Walks).
C10	Outside Order Limits	Potential for impacts on the landscape character and visual setting of Kirkby Green. Potential for impacts on the residential amenity of local properties.
Springwell Central		
B1	Within Order Limits (partially)	Potential for impacts on the landscape character and visual setting of Scopwick and the Scopwick Conservation Area. Potential for impacts on the residential amenity of local properties.

Field Reference	Location in relation to Order Limits	Reason(s) for discounting for Solar PV development
Bcd065	Within Order Limits (partially)	Potential for impacts on the heritage setting of Scopwick Mill. Potential for impacts on the residential amenity of local properties. Potential for landscape and visual impacts on users of local roads (B1191).
Bcd066	Within Order Limits (partially)	Potential for impacts on the heritage setting of Scopwick Mill. Potential for impacts on the residential amenity of local properties. Potential for landscape and visual impacts on users of local roads (B1191).
Bcd067	Within Order Limits (partially)	Potential for landscape and visual impacts on users of local roads (B1191).
Bcd068	Within Order Limits (partially)	Potential for impacts on the heritage setting of Scopwick Mill. Potential for impacts on the residential amenity of local properties. Potential for landscape and visual impacts on users of local roads (B1191).
Bcd148	Within Order Limits (partially)	Potential for impacts on the landscape character and visual setting of Scopwick and the Scopwick Conservation Area. Potential for impacts on the residential amenity of local properties.
Bk01	Outside Order Limits	Potential for impacts on the landscape character and comprising of majority BMV land.
Bk03	Within Order Limits	Potential for impacts on the heritage setting of Scopwick Mill. Potential for impacts on the residential amenity of local properties. Potential for landscape and visual impacts on users of local roads (B1191).
Bk07	Within Order Limits	Field has high archaeological potential.

Field Reference	Location in relation to Order Limits	Reason(s) for discounting for Solar PV development
		Potential for impacts on the residential amenity of local properties. Potential for landscape and visual impacts on users of local roads (B1191).
Bk12	Outside Order Limits	Field comprises majority Grade 2 ALC land. Potential for impacts on the landscape character and visual setting of Scopwick and the Scopwick Conservation Area.
Bk13	Outside Order Limits	Potential for impacts on the landscape character and visual setting of Scopwick and the Scopwick Conservation Area. Potential for impacts on the residential amenity of local properties.
Bk17	Outside Order Limits	Field comprises majority Grade 2 ALC land. Potential for impacts on the landscape character and visual setting of Scopwick and the Scopwick Conservation Area. Potential for impacts on the residential amenity of local properties.
Bk18	Outside Order Limits	Field comprises majority Grade 2 ALC land. Potential for impacts on the landscape character and visual setting of Scopwick and the Scopwick Conservation Area. Potential for impacts on the residential amenity of local properties.
Rw04	Outside Order Limits	Field has high archaeological potential. Potential for impacts on the residential amenity of local properties.
Rw05	Outside Order Limits	Potential for impacts on the residential amenity of local properties.
Rw06	Outside Order Limits	Field has high archaeological potential.
Rw07	Outside Order Limits	Potential for impacts on the residential amenity of local properties.
Rw08	Outside Order Limits	Potential for impacts on the residential amenity of local properties.

Field Reference	Location in relation to Order Limits	Reason(s) for discounting for Solar PV development
Rw10	Outside Order Limits	Field has high archaeological potential. Potential for impacts on the setting of heritage assets. Potential for impacts on the residential amenity of local properties. Field includes extensive areas of Grade 2 ALC land. Potential for landscape and visual impacts on users of local roads (B1191).
Rw11	Outside Order Limits	Field has high archaeological potential. Field comprises majority Grade 2 ALC land. Potential for impacts on the setting of heritage assets. Potential for impacts on the residential amenity of local properties. Potential for landscape and visual impacts on users of local roads (B1191).
Rw12	Within Order Limits	Field has high archaeological potential. Potential for impacts on the residential amenity of local properties. Potential for landscape and visual impacts on users of local roads (B1191).
Springwell West		
Bcd044	Within Order Limits (partially)	Potential for impacts on the residential amenity of local properties.
Bcd072	Within Order Limits (partially)	Potential for impacts on the residential amenity of local properties.
Bcd073	Outside Order Limits	MoD request to remove fields on the basis of safeguarding concerns.
Bcd076	Outside Order Limits	MoD request to remove fields on the basis of safeguarding concerns. Potential for impacts on the residential amenity of local properties.

Field Reference	Location in relation to Order Limits	Reason(s) for discounting for Solar PV development
Bcd078	Outside Order Limits	MoD request to remove fields on the basis of safeguarding concerns.
Bcd079	Within Order Limits (partially)	Field has high archaeological potential. Potential for impacts on the residential amenity of local properties.
Bcd082	Within Order Limits	Field includes extensive areas of Grade 2 ALC land. Potential for impacts on the residential amenity of local properties. Potential for landscape and visual impacts on users of PRoW.
Bcd083	Within Order Limits (partially)	Potential for impacts on the residential amenity of local properties.
Bcd084	Within Order Limits	MoD request to remove fields on the basis of safeguarding concerns.
Bcd086	Within Order Limits	MoD request to remove fields on the basis of safeguarding concerns.
Bcd088	Within Order Limits	Potential for impacts on the residential amenity of local properties.
Bcd100	Outside Order Limits	Potential for impacts on the residential amenity of local properties.
Bcd104	Outside Order Limits	Potential for impacts on the residential amenity of local properties.
Bcd109	Outside Order Limits	Potential for impacts on the residential amenity of local properties. Potential for landscape and visual impacts on users of local roads (B1191).
Bcd110	Outside Order Limits	Field located within an area of Flood Zone 2 and 3. Potential for impacts on the residential amenity of local properties. Potential for landscape and visual impacts on users of local roads (B1191).
Bcd111	Outside Order Limits	Field located within an area of Flood Zone 2 and 3. Potential for impacts on the residential amenity of local properties.

Field Reference	Location in relation to Order Limits	Reason(s) for discounting for Solar PV development
Bcd120	Outside Order Limits	Potential for impacts on the residential amenity of local properties. Potential for landscape and visual impacts on users of local roads (B1191).
Bcd140	Within Order Limits	Field has high archaeological potential. Field comprises majority Grade 2 ALC land. Potential for landscape and visual impacts on users of PRoW.
Bcd141	Within Order Limits	Field has high archaeological potential. Field comprises majority Grade 2 ALC land. Potential for landscape and visual impacts on users of PRoW.
E1a	Within Order Limits (partially)	Potential for impacts on the landscape character and visual setting of Brauncewell village. Potential for impacts on the setting of Brauncewell Medieval village scheduled monument and line of sight to the Grade II listed Brauncewell Church. Potential for impacts on the residential amenity of local properties. Field includes extensive areas of Grade 2 ALC land.
E2	Within Order Limits	Potential for impacts on the landscape character and visual setting of Brauncewell village. Potential for impacts on the setting of Brauncewell Medieval village scheduled monument and line of sight to the Grade II listed Brauncewell Church. Potential for impacts on the landscape character and visual setting of Brauncewell.
W2	Outside Order Limits	Potential for impacts on the residential amenity of local properties.
Tb1	Within Order Limits (partially)	Potential for impacts on the residential amenity of local properties. Potential for impacts on users of local PRoW.

4. Why solar panels need to be located in Flood Zone 3b for operational reasons

4.1.1. Paragraph 5.8.41 of NPS EN-1 sets out that, where essential energy infrastructure has to be located in (Flood Zone 3b), 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.

4.1.2. The Proposed Development is essential energy infrastructure and Critical National Priority infrastructure, as recognised by NPS EN-1 and NPS EN-3.

4.1.3. As set out in the **Planning Statement [EN010149/APP/7.2.2]** [AS-018] and **Statement of Need [EN010149/APP/7.1]** [APP-0135], renewable energy infrastructure can only be located where there is capacity for the National Grid to take that energy to where it is needed. The need is also such that we need to be doing as much as possible, in suitable areas, as quickly as possible.

4.1.4. Operationally, therefore, utility scale solar farms can only be located where they can connect to the National Grid and the Applicant considered a number of search criteria in identifying suitable sites, as explained earlier in this note.

4.1.5. As stated in the **Planning Statement [EN010149/APP/7.2.2]** [AS-018], paragraph 5.8.41 of NPS EN-1 states that energy projects should not *normally* be consented in Flood Zone 3b, recognising that there will be exceptions to this. It should be also be recognised that this policy applies to all energy developments, including those with substantial permanent buildings. As recognised in the **Flood Risk Assessment [EN010149/APP/7.16.3]**, solar panels do not have the same impact on the flood plain as solid built infrastructure and water can flow freely underneath the panels. It is for this reason that the EA is generally content with solar panels to be located in areas of flood risk.

4.1.6. Annex 3 of the NPPF is informative in terms of how it considers solar farms in the context of essential infrastructure, as a material consideration for the Secretary of State's decision. It lists solar as essential infrastructure from a flood risk vulnerability classification perspective, for the purposes of the application of the exception test. Solar farms are listed as a type of essential infrastructure which is suitable in Flood Zones 2 and 3 and there is no policy requirement to provide "operational reasons" in the same way as there is for other essential utility infrastructure "*which has to be located in a flood risk area for operational reasons*". The NPPF also recognises in the context of other types of energy infrastructure that electricity supply and generation is an operational reason in itself for being located in Flood Zones 2 and 3.

4.1.7. It is clear, particularly in the context of the approach in the NPPF as set out above, that the Proposed Development, as a solar farm, is essential energy infrastructure for the purposes of EN-1 paragraph 5.8.41.

4.1.8. In this case, the areas within Flood Zones 2 and 3 are on field margins, where the rest of the field would be used for solar panels. If the areas within Flood Zone 3b were not being used for solar, they would not be used for any other practical purpose. Given the urgent need for renewable energy and therefore the need to maximise energy generation and available grid capacity, there is therefore a strong operational reasons for the inclusion of solar panels in this location.

5. Conclusion and overall flood risk considerations

5.1.1. The Applicant has carried out close engagement with the Environment Agency throughout the pre-application period and they are in agreement that the Proposed Development will not result in an increase in flood risk on the site or elsewhere. This is documented in the **Draft Statement of Common Ground - Environment Agency [EN010149/APP/8.5]**, submitted at Deadline 1.

5.1.2. The Applicant considers that the explanation, reasoning and referenced evidence in this statement clearly demonstrates full compliance with the key policy requirements set out in the NPS EN-1, particularly paragraph 5.8.36 in relation to flood risk. The site selection process has applied the Sequential Test appropriately, ensuring the Proposed Development is predominantly located within Flood Zone 1, the area of lowest flood risk. This reflects a clear commitment to directing development away from areas at highest risk wherever practicable.

5.1.3. Where elements of the Proposed Development do extend into Flood Zones 2 and 3, a rigorous, risk-informed design approach has been adopted. All potentially vulnerable infrastructure—including the central inverters, Springwell substation, and Collector Compounds—will be located outside these higher-risk zones. The only components sited within Flood Zones 3a and 3b are the Solar PV modules, which are classified as 'essential infrastructure' under national planning guidance. These modules will be elevated to a minimum of 0.8m above existing ground level, ensuring their continued functionality and safety during flood events.

5.1.4. In accordance with national planning policy, where required, the development also satisfies the Exception Test (see sections 5.1.7 and 5.1.8 of the **Flood Risk Assessment [EN010149/APP/7.16.3]**) as follows:

- Development that has to be in a flood risk area will provide wider sustainability benefits to the community that outweigh flood risk.
  - Solar energy is essential energy infrastructure and is a key component of the UK's switch to renewable sources and the achievement of net zero.
  - The Proposed Development will provide direct capital investment, with direct additional jobs for the North Kesteven Economy.
  - The Proposed Development will include ecological mitigation and enhancements.
- The Proposed Development 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 proposed mitigation measures set out in Section 4 above will ensure the Site does not increase fluvial and surface water flood risk when infrastructure is placed within areas considered to be at risk.
  - The Proposed Development will provide controls on surface water drainage thereby reducing the risk of flooding.
  - The areas of the Site at flood risk will be unmanned and monitored remotely, hence minimal vulnerability to users.

5.1.5. It is demonstrated that the Proposed Development provides wider sustainability benefits that outweigh flood risk and that it will remain safe for its lifetime without increasing risk elsewhere, through the implementation of appropriate flood risk mitigation and management measures.

5.1.6. The Applicant has engaged proactively with the Lead Local Flood Authority, and the development proposals reflect their advice and best practice guidance. Taken together, the application of the Sequential and Exception Tests, the resilient design approach, and the nature of the proposed use confirm that the site is wholly suitable for solar energy generation. The Proposed Development is therefore acceptable in flood risk terms and fully compliant with the relevant national and local planning policies.

5.1.7. In overall planning terms, the Proposed Development is also making the best use of the available land for solar and maximising its renewable energy generating potential. If the areas in Flood Zones 2 and 3 were not used for solar panels, they would effectively result in small areas, largely at the end of rows of panels, not being utilised. This is not the most effective use of land and the Proposed Development would not be making the best use of land for renewable energy, consistent with the urgent need identified in NPS EN-1 and EN-3 or the National Planning Policy Framework on making effective use of land and good planning.

Springwell
Solar Farm

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