



# Frodsham Solar

## Green Belt Impacts Summary Table

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**Planning Act 2008; and Infrastructure Planning (Applications:  
Prescribed Forms and Procedure) Regulations Regulation 5(2)(q)**

**Revision P02**

Action 28 from the Issue Specific Hearing 2 (ISH2) requested that a tabulated summary of the Applicant's and CWCC's conclusions in relation to the harms and benefits of the Proposed Development be provided to allow these factors to be weighed in the 'green belt balance'. The Applicant supplied the completed table to the Council for its input, but due to resourcing constraints, the Council was not able to provide its response prior to the deadline. If considered helpful the Applicant can provide a consolidated version at Deadline 6.

Table 2 below was provided by the ExA following ISH2. The ExA suggested that the Applicant and the Council may wish to modify it to assist the ExA in its consideration of green belt matters. Some minor changes have therefore been made to the table. The Applicant has also provided some introductory commentary to help contextualise this table within the approach taken to green belt policy by the Applicant and its relationship with the overall planning balance presented in the Planning Statement.

The Applicant has completed Table 2, on the following basis:

- i) that the ExA / SoS conclude that the Proposed Development is not located on grey belt and the 'tests' at paragraph 155 of the NPPF have not been met (and accordingly is inappropriate development); and/or
- ii) the ExA / SoS conclude that the Proposed Development is not Critical National Priority Infrastructure (CNP) and that the need to demonstrate very special circumstances to justify inappropriate development remains.

Likewise, the requirement in national policy (NPPF) to give substantial weight to any harm to the Green Belt is only required in the event that the Proposed Development is not located on grey belt and is inappropriate.

Irrespective of the conclusion on grey belt and consideration of CNP policy, the Applicant has concluded that the harm to the spatial / physical and perceived openness of the Green Belt is limited, and that it would not prevent the green belt from serving purposes (a), (b), (d) or (e). The Applicant concludes that there would be moderate harm to the green belt from serving purpose (c) (safeguarding the countryside from encroachment).

As a result of preparing this submission, and points raised by the ExA during ISH2, the Applicant has reviewed the conclusions set out within Chapter 8 of the Planning Statement and has revised the document to include a planning balance table that summarises the overall weight to be given to considerations in favour of granting consent for Proposed Development (benefits) and considerations against granting consent (harm). The revised Planning Statement has also been submitted at Deadline 5, but for ease of reference, the planning balance table has been replicated below (see Table 1).

Table 2 provides a more detailed consideration of the various factors that contribute to forming an overall conclusion on the weight given to the overarching topics presented in Table 1. Consequently, the weighting applied in both tables is interconnected, with the findings presented in Table 2 informing the judgments made in Table 1. The judgements set out in Table 1 are explained in more detail in Chapter 8 of the Planning Statement.

As noted above Table 2 is provided to allow a separate Green Belt balancing exercise to be carried out in the event that the ExA / SoS conclude that 'very special circumstances' are required to justify inappropriate development in the Green Belt. Where issues/topics are determined to have no harm or benefit following the implementation of embedded or additional mitigation, then these are not considered within Table 2 (given that they would have no material effect on the Green Belt balancing exercise). However, for completeness these issues/topics are included within overall planning balance at Table 1.

The weighting judgements set out in Table 1 have been made on balance, where both positive and negative attributes are identified across the duration of the project.

The weighting used is listed at the foot of Table 2 and is consistent with that set out within the glossary of NPS EN-1.

**Table 1: Frodsham Solar – Summary of Applicants overall Planning Balance (following implementation of mitigation)**

Issue / Criteria	Finding on Balance	Weighting
Need for renewable energy	Positive	Substantial
Need for energy security	Positive	Significant
Contribution to climate change	Positive	Significant
Need for energy storage	Positive	Moderate
Efficiency of land use	Positive	Moderate
Ecology and Biodiversity	Positive	Moderate
Tourism / rights of way	Positive	Limited
Ground Conditions	Neutral	No weighing
Agricultural Land	Neutral	No weighting
Flood Risk and Drainage	Neutral	No weighting
Water Quality	Neutral	No weighting
Air Quality	Neutral	No weighting
Socio-Economic	Neutral	No weighting
Resource and Waste Management	Neutral	No weighting
Human Health	Neutral	No weighting
Noise	Negative	Limited
Glint and Glare	Negative	Limited
Traffic	Negative	Limited
Heritage	Negative	Limited
Landscape and Visual	Negative	Moderate

**Table 2: Frodsham Solar – Summary of Parties’ Positions Regarding Paragraph 153 of the 2024 NPPF (Green Belt Balance following implementation of mitigation)**

‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and **any other harm** resulting from the proposal, is clearly outweighed by **other considerations**.

Applicant			Council		
Consideration (following implementation of mitigation where appropriate)	Weight*	EL Ref & Para No	Consideration (either ‘as noted by applicant’ or add a new consideration on a new line)	Weight* (either ‘agree’ or give different weighting)	Explanation for any difference in weighting
<b>Any Other Harms</b>					
<b>Landscape and Visual (Harm)</b>					
Landscape Fabric (Construction)	Limited	APP-039 6.1 Chapter 6 Landscape and Visual Amenity paragraph 6.8.8 concludes the effect would be small in magnitude, minor adverse and not significant.			
Landscape Fabric (Short Term Operational)	Limited	APP-039 6.1 Chapter 6 Landscape and Visual Amenity paragraph 6.8.38-6.8.40 concludes the change to pasture and neutral grassland and hedgerows would be small to medium in magnitude, and there would be a minor to moderate level of effect. The effects would not be significant but would have an adverse effect. APP-039 6.1 Chapter 6 Landscape and Visual Amenity paragraph 6.8.45 concludes effects arising from the Proposed SPEN Grid Connection would be negligible and neutral.			
Landscape Character impact from within Order Limit (Construction)	Significant	APP-039 6.1 Chapter 6 Landscape and Visual Amenity paragraph 6.8.10 and APP-069 Appendix 6-6 Construction Phase Effects concludes moderate to major adverse effect on character of LCA4a which would be significant in EIA terms			
Landscape Character impact beyond Order Limit (Construction)	Limited	APP-039 6.1 Chapter 6 Landscape and Visual Amenity paragraph 6.8.11 construction phase activities would either be visible as a very limited and small-scale presence, or not visible at all. No other character areas would experience any effect.			
Landscape Character impact from within Order Limit (Operational – in the short term)	Significant	APP-039 6.1 Chapter 6 Landscape and Visual Amenity Table 6.8 concludes that the Character Area (LCA4a: Frodsham, Helsby and Lordship Marshes) would experience moderate to major adverse effect			
Landscape Character impact beyond Order Limit (Operational)	Limited / Moderate	APP-039 6.1 Chapter 6 Landscape and Visual Amenity Table 6.8 concludes that the Character Areas beyond the Order Limits would range from negligible / neutral adverse effect to minor / moderate adverse effect that would not be significant.			
Visual impact from within Order Limit (Construction)	Great / Significant	APP-039 6.1 Chapter 6 Landscape and Visual Amenity paragraph 6.8.12 and APP-069 Appendix 6-6 Construction Phase Effects concludes moderate to major significant effects on viewpoints 17, 18, 20, 21, 23 and 25 during construction			
Visual impact beyond Order Limit (Construction)	Limited	APP-039 6.1 Chapter 6 Landscape and Visual Amenity Table 6.6 (Summary of Construction Phase Effects) concludes negligible / neutral effects through to minor moderate effects from those viewpoints beyond the Order Limits			
Visual impact from within Order Limit (Operational Short Term (Year 0))	Great / Significant	APP-039 Chapter 6 Landscape and Visual Amenity Table 6.9 (Summary of Operational Phase Effects on Viewpoints 14, 15, 17, 18, 20, 23, 25) and paragraphs 6.8.69 – 6.8.83 concludes that the effect will be minor adverse (viewpoint 20); moderate to adverse but not significant (viewpoint 14, 15, 17, 23, 25); to			

		moderate to major adverse and significant at two viewpoints (viewpoint 18 and 25)			
Visual impact from within Order Limit (Operational Medium / Long Term (Year 10))	Moderate	APP-039 Chapter 6 Landscape and Visual Amenity Table 6.9 (Summary of Operational Phase Effects on Viewpoints 14, 15, 17, 18, 20, 23, 25) and paragraphs 6.8.69 – 6.8.83 concludes that the effect will be minor adverse (viewpoint 20); minor to moderate but not significant (viewpoint 14, 15, 17, 23); to moderate to major adverse and significant (viewpoint 18). By year 10 landscape mitigation of visual effects at viewpoint 25 would have reduced such that it would no longer be significant.			
Visual impact beyond Order Limit (Operational Short Term (Year 0))	Limited	APP-039 Chapter 6 Landscape and Visual Amenity Table 6.9 (Summary of Operational Phase Effects on Viewpoints 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 16, 19, 21, 22, 24, 26, 27, 28, 29, 30) and paragraphs 6.8.69 – 6.8.83 concludes that the effect will be negligible / neutral through to moderate adverse (at 6, 9 and 13 only) and not significant			
Visual impact beyond Order Limit (Operational Medium / Long Term (Year 10))	Limited	APP-039 Chapter 6 Landscape and Visual Amenity Table 6.9 (Summary of Operational Phase Effects on Viewpoints 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 16, 19, 21, 22, 24, 26, 27, 28, 29, 30) and paragraphs 6.8.69 – 6.8.83 concludes that the effect will be negligible / neutral through to moderate adverse (at 6, 9 and 13 only) and not significant			
<b>Ecology and Biodiversity (Harm)</b>					
Ecological Impact (Terrestrial) (Construction) on National Statutory Designated Sites	Limited	APP-040 Chapter 7 Terrestrial Ecology paragraph 7.8.6 concludes non-significant temporary minor adverse effects			
Ecological Impact (Terrestrial) (Construction) on Non-Statutory Designated Sites	Moderate	APP-040 Chapter 7 Terrestrial Ecology paragraph 7.8.6 concludes that development is in part within Frodsham, Helsby and Ince Marshes LWS resulting in a temporary significant moderate adverse effect, and non-significant minor adverse effect on Frodsham Field Studies Centre LWS			
Ecological Impact (Terrestrial) (Construction) on Habitat	Limited	APP-040 Chapter 7 Terrestrial Ecology paragraph 7.8.24 concludes non-significant minor adverse effects of habitats of principal importance, and temporary non-significant minor adverse effects on other habitats			
Ecological Impact (Terrestrial) (Construction) Species Specific	Limited	APP-040 Chapter 7 Terrestrial Ecology concludes at the following paragraph: 7.8.37 (Bats); 7.8.47 (Otter); 7.8.55 (Water Vole); 7.8.61 (Other mammals); 7.8.68 (Fish); 7.8.71 (Invertebrates) that the construction will result in minor adverse, non-significant effects			
Ecological Impact (Ornithology) (Construction) Mersey Estuary SPA / Ramsar / SSSI	Limited	APP-041 Chapter 8 Ornithology Table 8.20 Assessment of likely significant effects identifies a non-significant minor adverse residual effect			
Ecological Impact (Ornithology) on Functionally linked land (Cells 1, 2, 5, 6)	Limited	APP-041 Chapter 8 Ornithology Table 8.20 Assessment of likely significant effects identifies a non-significant minor adverse residual effect			
Ecological Impact (Ornithology) (Construction) Frodsham, Helsby & Ince Marshes LWS	Limited	APP-041 Chapter 8 Ornithology Table 8.20 Assessment of likely significant effects identifies a non-significant, short term, minor adverse residual effect			
Ecological Impact (Ornithology) Breeding Birds (Skylark, Lapwing)	Limited	APP-041 Chapter 8 Ornithology Table 8.20 Assessment of likely significant effects identifies a non-significant minor adverse residual effect on Skylark			

Ecological Impact (Ornithology) Non-breeding birds	Limited	APP-041 Chapter 8 Ornithology Table 8.20 Assessment of likely significant effects identifies a non-significant short term minor adverse effect.			
<b>Residential Amenity</b>					
Residential Amenity (Construction) – Noise & Dust	Limited	NPS EN-3 Paragraphs 2.10.161 & 2.10.162 describes the need to consider residential amenity impacts and with regard to construction impacts relevant to noise and vibration limited weight should be applied. REP1-012 Outline Construction Environmental Management Plan (CEMP) paragraph 1.3.3 confirms that a Construction Dust Management Plan (CDMP) will confirm measures to ensure control of dust during construction phase.			
Residential Amenity (Operational) – Glint and Glare	Limited	REP4-018 6.2 ES Volume 2 Appendix 6-3 Residential Properties (update) Section 2.1 reflects changes to the configuration of the Solar Panels and use of antireflective coating. It concludes that no property would experience a moderate effect, but that low glint and glare effects would be experienced at 31 properties located at the northern edge of Frodsham. No glint and glare effects are identified at either of the residential caravan sites off Brook Lane. REP4-016 6.2 ES Volume 2 Appendix 4-3 Glint and Glare states that the maximum daily duration for any impacted dwelling is predicted to be 22 minutes. The maximum median daily durations are just less than four minutes that have a median daily duration of around three minutes and 30 seconds.			
<b>Heritage</b>					
Heritage (Construction) Archaeological	Limited	APP-044 Chapter 11 Cultural Heritage paragraph 11.12.4 concludes a minor adverse effect on non-designated ventilation shafts and negligible adverse direct effect on ridge and furrow deposits. Duties under Regulation 3 of the Infrastructure Planning (Decisions) Regulations 2010 are considered separately. Whilst affording great weight to the desirability of preserving assets is applied, the overall harm is considered limited.			
Heritage (Operational) Setting	Limited	APP-044 Chapter 11 Cultural Heritage paragraph 11.12.6 concludes a non-significant minor adverse indirect effect on the setting of a number of heritage assets, including designated scheduled assets.			
<b>Traffic</b>					
Traffic (Construction)	Limited	APP-131 7.3 Transport Assessment paragraph 6.8.1 – 6.8.3 concludes that across the adopted highway network during peak period of the construction phase would be below the IEMA Rule 1 Threshold and would largely fall within accepted level of day-to-day traffic variation. Impact at key junctions would not be significant, and the impact on pedestrian and cycle amenity would be negligible.			
Traffic (Operational)	Limited	APP-131 7.3 Transport Assessment Section 4.6 confirms that there would be an expected 10 FTE roles during operation.			
<b>Tourism &amp; Recreation / Rights of Way (Harm)</b>					
Tourism & Recreation (inc. Rights of Way) (Construction)	Limited	APP-045 Chapter 12 Tourism and Recreation Table 12.13 consider the impact on a series of recreational receptors (including public rights of way) during the Construction Phase of the development. It concludes that the effects would be negligible to minor adverse and not significant			
<b>Other Considerations (Benefits)</b>					
<b>Need</b>					

National need for Renewable Energy (Operational)	Substantial	NPS EN-1 paragraphs 3.2.6 to 3.2.8 state that there is need for the Proposed Development, that there is a need for the development, that need is urgent, and that the Secretary of State should give substantial weight to that need			
National need for Energy Security (Operational)	Significant	APP-128 5.6 Planning Statement Section 2.4 confirms the need for achieving energy security and where that is set out within UK Policy and Energy Strategy.			
National need to Green Economic Growth	Great	APP-128 5.6 Planning Statement Section 2.5 sets out the role that the Proposed Development would play as part of the wider engine for economic growth.			
Local need for Renewable Energy (Operational)	Significant	APP-128 5.6 Planning Statement Section 2.5 and 5.3 set out the local need for the Proposed Development in the context of local climate emergency and net zero targets, local energy security and local economic security			
Contribution to Net Zero Targets	Significant	APP-128 5.6 Planning Statement Section 2.3 confirms the legally binding commitment to achieving net zero greenhouse gas emissions by 2050 and that the Government Clean Power 2030 Action Plan includes a target that Britain's electricity demand should be met entirely by 'clean' generation by 2030			
Need for Energy Storage (Operational)	Significant	APP-128 5.6 Planning Statement Section 2.3 confirms the pressing need for expanded energy storage capacity to provide flexibility in a renewables-dominated grid, and that storage systems are essential to shift excess generation to periods of high demand and maintain security of supply			
<b>Land Use</b>					
Lack of non-Green Belt Sites	Significant	APP-053 6.2 ES Volume 2 Appendix 3-1 Alternative Site Assessment evidence that there are no alternative sites (within or beyond the Green Belt) that can meet the objectives of the Proposed Development. NPS EN-1 paragraph 4.3.22 confirms that the SoS should be guided in considering alternative proposals by whether there is a realistic prospect of any alternative delivering the same infrastructure capacity in the same timescale as the Proposed Development.			
Efficiency of land use (co-location)	Moderate	NPS EN-3 paragraph 2.10.32 states that consideration may be given as to whether a proposal allows for continued agricultural use or co-location with other functions to maximise efficiency of land. APP-128 5.6 Planning Statement paragraph 1.10.2 states that by co-locating the solar with an existing windfarm it makes greater efficiency of land that cannot be utilised for other development, negating the need to access other land for that purpose.			
<b>Ecology and Benefits (Benefit)</b>					
Ecological (Operational) (Terrestrial) on Non-Statutory Designated Sites	Moderate / Great	APP-040 Chapter 7 Terrestrial Ecology paragraph 7.8.88 concludes that development is anticipated to result in medium to long term moderate positive effects on non-statutory designated sites which is significant.			
Ecological (Operational) (Terrestrial) on Habitats	Moderate / Great	APP-040 Chapter 7 Terrestrial Ecology paragraph 7.8.94 concludes that development is anticipated to result in medium to long term minor positive effects on habitats of principal importance and other habitats which is significant.			
Ecological (Operational) (Terrestrial) Species Specific	Limited	APP-040 Chapter 7 Terrestrial Ecology concludes at the following paragraph: 7.8.106 (Bats); 7.8.113 (Otter); 7.8.119 (Water Vole); 7.8.122 (Other mammals); 7.8.126 (Fish); 7.8.130 (Invertebrates) that the Proposed Development will result in minor positive, non-significant effects.			
Ecological Impact (Ornithology) (Operational) Mersey Estuary SPA / Ramsar / SSSI	Significant	APP-041 Chapter 8 Ornithology Table 8.20 Assessment of likely significant effects identifies a significant moderate			

		beneficial effect through the creation of the NBBMA creation and screening.			
Ecological Impact (Ornithology) (Operational) Frodsham, Helsby & Ince Marshes LWS	Moderate	APP-041 Chapter 8 Ornithology Table 8.20 Assessment of likely significant effects identifies a significant, long term moderate beneficial residual effect.			
Ecological Impact (Ornithology) Breeding Birds (Lapwing)	Limited	APP-041 Chapter 8 Ornithology Table 8.20 Assessment of likely significant effects identifies a non-significant minor beneficial residual effect on Lapwing.			
Ecological Impact (Ornithology) Other Farmland & Scrub-nesting Birds	Moderate	APP-041 Chapter 8 Ornithology Table 8.20 Assessment of likely significant effects identifies a significant moderate beneficial residual effect.			
Ecological Impact (Ornithology) Non-breeding birds	Moderate	APP-041 Chapter 8 Ornithology Table 8.20 Assessment of likely significant effects identifies a moderate beneficial long-term significant effect.			
Ecological Impact (Terrestrial) (Construction) Non-invasive species	Limited	APP-040 Chapter 7 Terrestrial Ecology paragraph 7.8.74 concludes non-significant minor positive effects on non-native species			
<b>Tourism &amp; Recreation / Rights of Way (Benefit)</b>					
Tourism & Recreation (Rights of Way) (Operational)	Limited	APP-045 Chapter 12 Tourism and Recreation Table 12.13 consider the impact on a series of recreational receptors (including public rights of way) during the Operational Phase of the development. It concludes that the effects would be negligible to minor adverse and not significant.			
<b>Landscape and Visual (Benefit)</b>					
Landscape Fabric (Operational) – Skylark Mitigation Area	Limited	APP-039 6.1 Chapter 6 Landscape and Visual Amenity paragraph 6.8.37 concludes large magnitude of change that would result in moderate level of effect which would be beneficial and not significant in EIA terms.			
Landscape Fabric (Longer Term Operational - Grassland, Hedgerow and Scrub Vegetation)	Limited	APP-039 6.1 Chapter 6 Landscape and Visual Amenity paragraph 6.8.38 – 6.3.42 concludes the proposed changes to management would diversify the structure and improve the quality of grassland, hedgerow and scrub vegetation. Paragraph 6.8.40 confirms that the enhanced management of hedgerows and provision of new planting would have a beneficial effect			
Landscape Fabric (Longer term Operational – Trees and Waterbodies)	Moderate	APP-039 6.1 Chapter 6 Landscape and Visual Amenity paragraph 6.8.41 – 6.3.43 concludes all retained and proposed vegetation would be managed throughout the 40-year life, with the intention of enhancing visual screening and increasing areas of habitat and habitat connectivity. A medium magnitude of change would occur that would result in a moderate to major level of effect. There would be an increase in tree cover and no loss, which would be significant.			
Landscape Character impact from within Order Limit (Operational – in the longer term)	Moderate	APP-039 6.1 Chapter 6 Landscape and Visual Amenity Table 6.8 concludes that the Character Area (LCA4a: Frodsham, Helsby and Lordship Marshes) experience moderate to major beneficial effects (landscape and biodiversity enhancements and enhancement to public access). Benefits identified on Residential Amenity (Rights of Way) and ecological / biodiversity are separate to Landscape Character and consequently are not 'double counted'.			

\* Weighting terminology (hierarchy amended to reflect the weight given within the NPS EN-1):

- No weight

- Limited positive / negative weight
- Moderate positive / negative weight
- Great positive / negative weight
- Significant positive / negative weight
- Substantial positive / negative weight

The agenda for ISH2 included planning policy considerations of the draft 2025 NPPF in relation to green belt policy. Whilst not included as an action point in **Action Points from issue specific hearing 2 (ISH2) [EV10-024]** the Applicant considered it may be useful to set out its views on the draft 2025 NPPF as this was not discussed in any detail within ISH2.

The draft NPPF was subject to consultation that ran from 16 December 2025 to 10 March 2026. The principal change proposed is that it has restructured the Framework into “plan making policies” and “National Decision-making policies” to make it clearer and more pro-growth. At Paragraph 13 it states that the changes are designed to “set out more clearly the intended relationship between statements of national planning policy and the supporting role played by PPG”. By embedding detailed rules into the NPPF, it ensures that these policies take precedence in decision-making and consequently reduces reliance on separate Planning Practice Guidance (PPG).

There are two major changes that are considered potentially of relevance to the proposal.

Firstly, the guidance as to how decision makers should assess whether sites and areas contribute STRONGLY to the purposes (a) (b) or (d) of Green Belt (the ‘tests for grey belt land’) are inserted into the draft 2025 NPPF at Paragraph 2 of Annex E (“When making judgements as to whether land is grey belt”), thereby negating the need for reference back to the PPG and elevating these judgements into national policy rather than as guidance to the national policy (although noting the Court of Appeal judgment in *Mead* in this regard). The ‘tests’ remain consistent with that currently set out within the PPG, and consequently the conclusions made by both the applicant and Council as to whether the Site is grey belt are not affected.

Secondly, the definition of ‘Grey belt’ within the draft 2025 NPPF differs to that of the adopted NPPF insofar as it removes from it reference to grey belt land needing to exclude land where the application of the policies relating to the areas or assets in footnote 7 provide a strong reason for refusing or restricting development. By doing so, it aims to maximise the amount of land eligible for development, treating footnote 7 constraints as specific, manageable planning considerations rather than an outright pre-emptive exclusion for identifying grey belt.