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EN010154

6.3 Environmental Statement Appendices

Appendix 6-A: Climate Change Policy and Legislation

Planning Act 2008 (as amended)

Regulation 5(2)(a)

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

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VOLUME

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Planning Act 2008

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulation 2009 (as amended)

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Development Consent Order 202[ ]

6.3 Environmental Statement Appendices

Appendix 6-A: Climate Change Policy and Legislation

Regulation Reference	Regulation 5(2)(a)
Planning Inspectorate Scheme Reference	EN010154
Application Document Reference	EN010154/APP/6.3
Author	Fosse Green Energy Limited

Version	Date	Issue Purpose
Rev 1	18 July 2025	DCO Submission

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1. Introduction

1.1 Purpose of the Appendix

1.1.1 This appendix to **Chapter 6: Climate Change** of the Environmental Statement (ES) **[EN010154/APP/6.1]** identifies and describes the legislation, policy and supporting guidance considered relevant to the assessment of the likely significant effects of the Proposed Development on climate change.

1.1.2 Legislation and policy are considered at both national and local levels.

1.1.3 This appendix does not assess the Proposed Development against legislation and policy, instead the purpose of considering legislation and policy in the Environmental Impact Assessment (EIA) is twofold;

a. To identify legislation and policy that could influence the determination of important climate features (and therefore the significance of effects) and any requirements for mitigation; and

b. To identify legislation and policy that could influence the methodology to be used within the ES assessment and/or within the EIA which will be presented in the Environmental Statement. For example, a policy may require the assessment of an impact or the use of a specific methodology.

1.1.4 The following sections identify and describe the legislation, policy and supporting guidance considered specifically relevant to the climate change assessment as presented in **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1].**

2. National Legislation, Policy and Guidance

2.1 International Legislation

The Paris Agreement (2015) and UK Nationally Determined Contribution

2.1.1 The Paris Agreement (2015) (Ref 2) is a legally binding international treaty on climate change. Its overarching goal is to hold “the increase in global average temperature to well below 2°C above pre-industrial levels” and pursue efforts to “limit the temperature increase to 1.5°C above pre-industrial levels”. Since 2016, countries have been submitting their national climate action plans, known as Nationally Determined Contributions (NDCs), with each NDC intending to reflect an increasing degree of ambition compared to its predecessor.

2.1.2 In December 2020, the United Kingdom (UK) communicated its first NDC to the United Nations Framework Convention on Climate Change (UNFCCC) (Ref 3) in line with Article 4 of the Paris Agreement. In this NDC, the UK commits to reducing economy-wide greenhouse gas emissions by at least 68% by 2030, compared to 1990 levels.

2.1.3 This UK Nationally Determined Contribution (Ref 4) was revised in 2022 in response to the Glasgow Climate Pact and an updated NDC was formally submitted to the UNFCCC under the Paris Agreement.

2.1.4 In January 2025, the UK's second NDC was presented in UK Parliament by DESNZ, setting the updated NDC by reducing all national greenhouse gas emissions by at least 81% by 2035 compared to 1990 levels (Ref 5).

2.2 National Legislation

The Climate Change Act 2008 and Climate Change Act 2008 (2050 Target Amendment) Order 2019

2.2.1 The Climate Change Act 2008 (Ref 6) set a legally binding target for the UK to ensure that the net UK carbon amount for the year 2050 is at least 80% lower than the 1990 baseline. This target is supported by legally binding 'carbon budgets' that place restriction on the total amount of greenhouse gases the UK can emit over a 5-year period, along with support from the Climate Change Committee (CCC), an independent body to monitor progress.

2.2.2 Section 1 of the Climate Change Act 2008 was amended in 2019 through the Climate Change Act 2008 (2050 Target Amendment) Order 2019 (Ref 7) to revise the target at least 80% lower emissions than 1990 baseline and increase the target to at least 100%.

Carbon Budgets

2.2.3 Under the Carbon Budgets system, every tonne of greenhouse gases emitted up to 2050 will be recorded. Where emissions rise in one sector, the UK will have to achieve corresponding falls in another. The following Carbon Budgets have been published to date:

a. The Carbon Budgets Order 2009 (Ref 8) sets the carbon budget totals for the First (2008-2012), Second (2013-2017) and Third (2018-2022) Carbon Budget periods;

b. The Carbon Budget Order 2011 (Ref 9) sets the carbon budget total for the Fourth (2023-2027) Carbon Budget period;

c. The Carbon Budget Order 2016 (Ref 10) sets the carbon budget total for the Fifth (2028-2032) Carbon Budget period; and

d. The Carbon Budget Order 2021 (Ref 11) sets the carbon budget total for the Sixth (2033-2037) Carbon Budget period.

e. The Carbon Budget Order 2025 (Ref 11) sets the carbon budget total for the Seventh (2038-2042) Carbon Budget period.[1]

The Infrastructure Planning (Environmental Impact Assessment (EIA)) Regulations (2017)

2.2.4 Regulation 5 of The Infrastructure Planning (Environmental Impact Assessment (EIA)) Regulations 2017 (Ref 1) sets out that an EIA must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect likely significant effects of the Proposed Development on climate change.

2.3 National Policy Statements

2.3.1 EIA takes account of the following National Policy Statements (NPSs), which have effect in relation to the Proposed Development and provide a framework for decision making by the Secretary of State:

a. Overarching National Policy Statement for Energy (EN-1) (Ref 13);

b. National Policy Statement for Renewable Energy Infrastructure (EN-3) (Ref 14); and

c. National Policy Statement for Electricity Networks Infrastructure (EN-5) (Ref 15).

2.3.2 The NPSs set out the Government policy for delivery of major energy infrastructure, along with the need for new infrastructure and guidance for determining applications for Development Consent Orders (DCOs). The NPSs provide specific guidance and criteria that applicants should cover when assessing the effects of their Proposed Development, how the Secretary of State should consider these impacts, and any mitigation measures applied.

2.3.3 The relevant NPS (NP EN-1, NPS EN-3, and NPS EN-5) requirements for climate change are provided in in **Table 1** and **Table 3**, along with an indication of where in the ES this information can be sourced.

[1] The 7th Carbon Budget has been published by the Committee on Climate Change, but it has not yet been approved by government or ratified by parliament. Although the proposed 7th Carbon Budget is often referred to as the '2025 Carbon Budget Order', the statutory deadline for it to be set is June 2026

Overarching National Policy Statement for Energy (EN-1) November 2023

Table 1: NPS EN-1 Requirements Relevant to Climate Change

NPS EN-1 paragraph	Requirement	Where this is addressed in the ES
Paragraph 2.1.6	This energy NPS considers the large-scale infrastructure which will be required to ensure the UK can provide a secure, reliable, and affordable supply of energy, while also meeting our decarbonisation targets.	The Lifecycle Greenhouse Gas Impact Assessment (Section 6.4) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** provides an assessment of the Proposed Development's impact on the UK's net zero pathway and its potential impact on fossil fuels.
Paragraph 2.2.1	In June 2019, the UK became the first major economy to legislate for a 2050 net zero Greenhouse Gases ('GHG') emissions target through the Climate Change Act 2008 (2050 Target Amendment) Order 2019. In December 2020, the UK communicated its Nationally Determined Contributions to reduce GHG emissions by at least 68 per cent from 1990 levels by 2030. In April 2021, the government legislated for the sixth carbon budget (CB6), which requires the UK to reduce GHG emissions by 78 per cent by 2035 compared to 1990 levels. *This was agreed in Parliament and brought into law in June 2021, setting the UK Carbon Budget at 965 MtCO2e. Although the 7th Carbon Budget has been presented by CCC (2025), it has not yet been set in to law and incorporated into planning policy, so is therefore subject to change*.	The Lifecycle Greenhouse Gas Impact Assessment (Section 6.4) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** provides an assessment of the Proposed Development's impact on the UK's net zero pathway and its potential impact on fossil fuels. Legislation, planning policy and guidance related to the assessment are summarised in Legislation and Planning Policy (Section 6.2) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]**.
Paragraph 4.10.5	In certain circumstances, measures implemented to ensure a scheme can adapt to climate change may give rise to additional impacts, for example as a result of protecting against flood risk, there may be consequential impacts on coastal change. In preparing measures to support climate change adaptation applicants should take reasonable steps	Climate Change Risk Embedded Mitigation Measures (Section 6.5) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** outlines embedded adaptation measures to ensure the Proposed Development is resilient to climate change.

NPS EN-1 paragraph	Requirement	Where this is addressed in the ES
	to maximise the use of nature-based solutions alongside other conventional techniques.	The Climate Change Risk Assessment of Effects (Section 6.5) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** provides an assessment of the Proposed Development's impact on climate change taking into account embedded measures that are incorporated into the design from the outset or identified through the assessment process.
Paragraph 4.10.8	New energy infrastructure will typically need to remain operational over many decades, in the face of a changing climate. Consequently, applicants must consider the direct (e.g. site flooding, limited water availability, storms, heatwave and wildfire threats to infrastructure and operations) and indirect (e.g. access roads or other critical dependencies impacted by flooding, storms, heatwaves or wildfires) impacts of climate change when planning the location, design, build, operation and, where appropriate, decommissioning of new energy infrastructure.	Climate Change Risk Assessment of Effects (Section 6.5) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** summarises the climate change risk assessment and outlines the assessment outputs.
Paragraph 4.10.9	The ES should set out how the proposal will take account of the projected impacts of climate change, using government guidance and industry standard benchmarks such as the Climate Change Allowances for Flood Risk Assessments, Climate Impacts Tool, and British Standards for climate change adaptation, in accordance with the EIA Regulations.	The projections from UKCP18 were used in the climate change risk assessment to take account of the projected impacts of climate change. The Assessment Methodology (Section 6.5) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** sets out the methodology and the applicable government guidance and industry standards adopted for the preliminary assessment.
Paragraph 4.10.10	Applicants should assess the impacts on and from their proposed energy project across a range of climate change scenarios, in line with appropriate expert advice and guidance available at the time.	The 10%, 50% and 90% percentiles of the UKCP18 probabilistic projections and the Representative Concentration Pathway (RCP) 8.5 scenario, are considered for climate parameters as outlined in the

NPS EN-1 paragraph	Requirement	Where this is addressed in the ES
		Baseline Conditions (Section 6.5) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]**.
Paragraph 4.10.11	Applicants should demonstrate that proposals have a high level of climate resilience built-in from the outset and should also demonstrate how proposals can be adapted over their predicted lifetimes to remain resilient to a credible maximum climate change scenario. These results should be considered alongside relevant research which is based on the climate change projections.	The projections from UKCP18 were used in the climate change risk assessment as detailed in the Assessment Method (Section 6.5) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]**. Embedded Mitigation Measures (Section 6.5) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** outlines embedded adaptation measures to ensure the Proposed Development is resilient to climate change.
Paragraph 4.10.12	Where energy infrastructure has safety critical elements, the applicant should apply a credible maximum climate change scenario. It is appropriate to take a risk-averse approach with elements of infrastructure which are critical to the safety of its operation.	As a precautionary approach, the UKCP18 RCP 8.5 (high emissions) scenario was chosen as outlined in the Baseline Conditions (Section 6.5) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]**.
Paragraph 4.10.13	The Secretary of State should be satisfied that applicants for new energy infrastructure have taken into account the potential impacts of climate change using the latest UK Climate Projections and associated research and expert guidance (such as the EA's Climate Change Allowances for Flood Risk Assessments or the Welsh Government's Climate change allowances and flood consequence assessments) available at the time the ES was prepared to ensure they have identified appropriate mitigation or adaptation measures. This should cover the estimated lifetime of the new infrastructure, including any decommissioning period.	The latest guidance and climate projections have been used as detailed in the Assessment Methodology (Section 6.5) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]**.
Paragraph 4.10.16	If any adaptation measures give rise to consequential impacts (for example on flooding, water resources or coastal	The In-Combination Climate Change Impact (ICCI) assessment considers potential consequential impacts

NPS EN-1 paragraph	Requirement	Where this is addressed in the ES
	change) the Secretary of State should consider the impact of the latter in relation to the application as a whole and the impacts guidance set out in Part 5 of this NPS.	from the combined impact of the Proposed Development and climate change as detailed in the Assessment Methodology (Section 6.6) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]**. The ICCI assessment is presented in **Appendix 6-C: In-combination Climate Change Impact Assessment** of the ES **[EN010154/APP/6.3]**.
Paragraph 4.10.17	Any adaptation measures should be based on the latest set of UK Climate Projections, the government's latest UK Climate Change Risk Assessment, when available, and in consultation with the EA's Climate Change Allowances for Flood Risk Assessments or the Welsh Government's Climate change allowances and flood consequence assessments	The latest guidance and climate projections have been used as detailed in the Climate Change Risk Assessment Methodology (Section 6.5) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]**, which has informed the development of the embedded adaptation measures to ensure the Proposed Development is resilient to climate change as outlined in Embedded Mitigation(Section 6.5) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]**.
Paragraph 4.10.19	Adaptation measures can be required to be implemented at the time of construction where necessary and appropriate to do so. However, where they are necessary to deal with the impact of climate change, and that measure would have an adverse effect on other aspects of the project and/or surrounding environment (for example coastal processes), the Secretary of State may consider requiring the applicant to keep the need for the adaptation measures under review, and ensure that the adaptation measure could be implemented should the need arise, rather than at the outset of the development (for example increasing height of existing, or requiring new, sea walls).	Climate Change Risk Embedded Measures (Section 6.5) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** outlines embedded adaptation measures to ensure the Proposed Development is resilient to climate change.

NPS EN-1 paragraph	Requirement	Where this is addressed in the ES
Paragraph 5.3.4	All proposals for energy infrastructure projects should include a GHG assessment as part of their ES (See Section 4.3 of NPS EN-1). This should include: • A whole life GHG assessment showing construction, operational and decommissioning GHG impacts, including impacts from change of land use. • An explanation of the steps that have been taken to drive down the climate change impacts at each of those stages. • Measurement of embodied GHG impact from the construction stage. • How reduction in energy demand and consumption during operation has been prioritised in comparison with other measures. • How operational emissions have been reduced as much as possible through the application of best available techniques for that type of technology. • Calculation of operational energy consumption and associated carbon emissions. • Whether and how any residual GHG emissions will be (voluntarily) offset or removed using a recognised framework. • Where there are residual emissions, the level of emissions and the impact of those on national and international efforts to limit climate change, both alone and where relevant in combination with other developments at a regional or national level, or sector level, if sectoral targets are developed.	The Lifecycle Greenhouse Gas Impact Assessment(Section 6.4) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** presents a whole-life carbon assessment. It also summarises the climate change risk assessment and outlines the assessment outputs. Embodied carbon during the construction stage is also measured in the Lifecycle Greenhouse Gas Impact Assessment (Section 6.4) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]**, which also discusses energy consumption. Lifecycle Greenhouse Gas Embedded Mitigation Measures (Section 6.4) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** discusses operational emissions mitigation measures. The Lifecycle Greenhouse Gas Impact Assessment (Section 6.4) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** discusses operational emissions. Residual emissions are discussed in the Residual Effects and Conclusions (Section 6.8) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]**.

NPS EN-1 paragraph	Requirement	Where this is addressed in the ES
Paragraph 5.3.5	A GHG assessment should be used to drive down GHG emissions at every stage of the proposed development and ensure that emissions are minimised as far as possible for the type of technology, taking into account the overall objectives of ensuring our supply of energy always remains secure, reliable and affordable, as we transition to net zero.	The Lifecycle Greenhouse Gas Impact Assessment (Section 6.4) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** presents a whole-life carbon assessment. GHG mitigation measures are outlined in the Embedded Mitigation Measures (Section 6.4) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1].**
Paragraph 5.3.6	Applicants should look for opportunities within the proposed development to embed nature-based or technological solutions to mitigate or offset the emissions of construction and decommissioning.	GHG mitigation measures are outlined in the Embedded Mitigation Measures (Section 6.4) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1].**
Paragraph 5.3.7	Steps taken to minimise and offset emissions should be set out in a GHG Reduction Strategy, secured under the Development Consent Order. The GHG Reduction Strategy should consider the creation and preservation of carbon stores and sinks including through woodland creation, hedgerow creation and restoration, peatland restoration and through other natural habitats.	GHG mitigation measures are outlined in the Lifecycle Greenhouse Gas Embedded Mitigation Measures (Section 6.4) of the **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]**.
Paragraph 5.3.8	The Secretary of State must be satisfied that the applicant has as far as possible assessed the GHG emissions of all stages of the development.	The Lifecycle Greenhouse Gas Impact Assessment (Section 6.4) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** presents a whole-life carbon assessment.
Paragraph 5.3.9	The Secretary of State should be content that the applicant has taken all reasonable steps to reduce the GHG emissions of the construction and decommissioning stage of the development.	The Lifecycle Greenhouse Gas Impact Assessment (Section 6.4) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** presents a whole-life carbon assessment.

NPS EN-1 paragraph	Requirement	Where this is addressed in the ES
Paragraph 5.3.10	The Secretary of State should give appropriate weight to projects that embed nature-based or technological processes to mitigate or offset the emissions of construction and decommissioning within the proposed development. However, in light of the vital role energy infrastructure plays in the process of economy wide decarbonisation, the Secretary of State must accept that there are likely to be some residual emissions from construction and decommissioning of energy infrastructure.	GHG mitigation measures are outlined in the Lifecycle Greenhouse Gas Embedded Mitigation Measures (Section 6.4) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]**.
Paragraph 5.3.12	Operational emissions will be addressed in a managed, economy-wide manner, to ensure consistency with carbon budgets, net zero and our international climate commitments. The Secretary of State does not, therefore need to assess individual applications for planning consent against operational carbon emissions and their contribution to carbon budgets, net zero and our international climate commitments.	The Lifecycle Greenhouse Gas Impact Assessment (Section 6.4) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** provides an assessment of the Proposed Development's impact on the UK's net zero pathway.
Paragraph 5.16.7	The ES should in particular describe: • The existing quality of waters affected by the proposed project and the impacts of the proposed project on water quality, noting any relevant existing discharges, proposed new discharges and proposed changes to discharges • Existing water resources affected by the proposed project and the impacts of the proposed project on water resources, noting any relevant existing abstraction rates, proposed new abstraction rates and proposed changes to abstraction rates (including any impact on or use of mains	Mitigation measures are covered in **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]**. ICCI assessment considers potential consequential impacts from the combined impact of the Proposed Development and climate change as detailed in the In-combination Climate Change Impact Assessment Methodology (Section 6.6) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]**. The ICCI assessment will be presented in **Appendix 6-C: In-combination Climate**

NPS EN-1 paragraph	Requirement	Where this is addressed in the ES
	supplies and reference to Abstraction Licensing Strategies) and also demonstrate how proposals minimise the use of water resources and water consumption in the first instance • Existing physical characteristics of the water environment (including quantity and dynamics of flow) affected by the proposed project and any impact of physical modifications to these characteristics. • Any impacts of the proposed project on water bodies or protected areas (including shellfish protected areas) under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 and source protection zones (SPZs) around potable groundwater abstractions. • How climate change could impact any of the above in the future • Any cumulative effects	**Change Impact Assessment** of the ES **[EN010154/APP/6.3]**.

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

Table 2: NPS EN-3 Requirements Relevant to Climate Change

NPS EN-3 paragraph	Requirement	Where this is addressed in the ES
Paragraph 2.4.2	Section 4.10 of EN-1 sets out generic considerations that applicants and the Secretary of State should take into account to help ensure that renewable energy infrastructure is safe and resilient to climate change, and that necessary action can be taken to ensure the operation of the infrastructure over its estimated lifetime.	Climate Change Risk Assessment of Effects (Section 6.5), of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]**, and in **Appendix 6-B: Climate Change Risk Assessment** of the ES **[EN010154/APP/6.3]** sets out the climate change hazards considered for the assessment in alignment with the Government's energy and climate strategy and policies.
Paragraph 2.4.3	Section 4.10 of EN-1 advises that the resilience of the project to climate change should be assessed in the Environmental Statement (ES) accompanying an application. For example, the impact of increased risk of drought as a result of higher temperatures should be covered in the water quality and resources section of the ES.	Climate risk and resilience to future climate conditions is considered in Climate Change Risk Assessment of Effects (Section 6.5) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]**, and in the Climate Risk Register presented in **Appendix 6-B: Climate Risk Register [EN010154/APP/6.3]**. Other chapters, such as **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]** also consider climate change impacts such as flooding.
Paragraph 2.4.11	Solar photovoltaic (PV) sites may also be proposed in low lying exposed sites. For these proposals, applicants should consider, in particular, how plant will be resilient to: • increased risk of flooding; and • impact of higher temperatures.	Flood risk, namely from pluvial and fluvial causes (coastal change is unlikely to affect the Proposed Development) and increased temperatures are considered in Climate Change Risk Assessment of Effects (Section 6.5) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]**, and in **Appendix 6-B: Climate Risk Register [EN010154/APP/6.3]**. Other chapters, such as **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]** also consider climate change impacts such as flooding

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

Table 3: NPS EN-5 Requirements Relevant to Climate Change

NPS EN-5 paragraph	Requirement	Where this is addressed in the ES
Paragraph 2.3.2	As climate change is likely to increase risks to the resilience of some of this infrastructure, from flooding for example, or in situations where it is located near the coast or an estuary or is underground, applicants should in particular set out to what extent the proposed development is expected to be vulnerable, and, as appropriate, how it has been designed to be resilient to: • flooding, particularly for substations that are vital to the network; and especially in light of changes to groundwater levels resulting from climate change; • the ffects of wind and storms on overhead lines; • higher average temperatures leading to increased transmission losses; and • earth movement or subsidence caused by flooding or drought (for underground cables).	Climate Change Risk Assessment of Effects (Section 6.5), of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]**, and in **Appendix 6-B: Climate risk Register** of the ES **[EN010154/APP/6.3]** set out the climate change hazards considered for the assessment in alignment with the Government's energy and climate strategy and policies.
Paragraph 2.3.3	Section 4.10 of EN-1 advises that the resilience of the project to the effects of climate change must be assessed in the Environmental Statement (ES) accompanying an application. For example, future increased risk of flooding would be covered in any flood risk assessment (see Sections 5.8 in EN-1). Consideration should also be given to coastal change (see sections 5.6 in EN1).	Flood risk, namely from pluvial and fluvial causes (coastal change is unlikely to affect the Proposed Development), is considered in Climate Change Risk Assessment of Effects (Section 6.5) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]**, and in **Appendix 6-B: Climate Risk Register** of the ES **[EN010154/APP/6.3]**. Other chapters, such as **Chapter 9: Water Environment** of the ES **[EN010154/APP/6.1]** also consider climate change impacts such as flooding.

2.4 National Planning Policy Framework

2.4.1 The National Planning Policy Framework (NPPF) (2024)[2] (Ref 16) sets out the Government's planning policies for England and how these are expected to be applied. Paragraph 5 outlines that while the Framework does not contain specific policies for Nationally Significant Infrastructure Projects (NSIPs), the NPPF is still relevant when considering the determination of DCOs. As a result, the EIA is taking the NPPF into account.

2.4.2 Paragraph 8 defines three overarching objectives within the planning system, which are interdependent and need to be pursued in mutually supportive ways:

a. **An economic objective:** to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b. **A social objective:** to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed and safe built places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c. **An environmental objective:** to contribute to protecting and enhancing the natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

2.4.3 Section 14 of the NPPF explains how local planning authorities should determine planning applications with consideration of climate change, and the national planning policy associated with meeting the challenge of climate change, flooding and coastal change. Relevant NPPF requirements relating to climate change, along with an indication of where the information is located within the ES to address these requirements, are provided in **Table 4**.

[2] The NPPF was amended in February 2025 to correct cross-referencing and amend one sentence in the policy. However, the policy itself did not change so is dated as 2024 when it was first published.

Table 4: Relevant NPPF Policy for Climate Change

Relevant NPPF Paragraph Reference	Requirement of the NPPF	Location of information provided to address this
Paragraph 161	The planning system should support the transition to net zero by 2050, taking full account of all climate impacts including flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.	The In-combination Climate Assessment of Effects (Section 6.6) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** and **Appendix 6-C: In-combination Climate Change Impact Assessment [EN010154/APP/6.3]** summarise the Proposed Development's impact on the net-zero trajectory and the climate change risk assessment and outlines the assessment outputs
Paragraph 164	New development should be planned for in ways that: • Avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the incorporation of green infrastructure; and • help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.	The Climate Change Risk Assessment of Effects (Section 6.5) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** assesses the Proposed Development's vulnerability to climate change and the Proposed Development's impact on the National Carbon Budgets and existing policy.

2.5 Other National Policy and Guidance

UK Climate Change Risk Assessment (2022)

2.5.1 The UK Climate Change Risk Assessment (Ref 17) outlines the UK Government and devolved administrations' position on the key climate risks and opportunities that the UK faces today, as required by the Climate Change Act (2008). This includes risks to natural carbon stores and sequestration from multiple hazards.

National Planning Practice Guidance (2014)

2.5.2 The National Planning Practice Guidance, Climate Change (Ref 18) guidance sets out how to identify suitable mitigation and climate adaptation measures to incorporate into the planning process, stating that: "...*effective spatial planning is an important part of a successful response to climate change as it can influence the emission of greenhouse gases… Planning can also help increase resilience to climate change impact through the location, mix and design of development*."

Net Zero Strategy: Build Back Greener (2021)

2.5.3 The Net Zero Strategy: Build Back Greener (Ref 19) sets out policies and proposals for decarbonising all sectors of the UK economy to meet our net zero target by 2050. One of the key policies is for the UK to be entirely powered by clean electricity sources by 2035.

Energy White Paper: Powering our Net Zero Future (2020)

2.5.4 The Energy White Paper (Ref 20) sets out how the UK will clean up its energy system and reach net zero emissions by 2050. The white paper emphasises that combatting climate change in order to meet the net zero target is of the highest priority to enable to UK to meet the challenge of becoming the first major net zero economy.

Powering up Britain (2023)

2.5.5 Powering Up Britain (Ref 21) was published in 2023 and sets out how the UK Government will enhance our country's energy security, seize the economic opportunities of the transition, and deliver on net zero commitments. To meet this ambition, the Department for Energy Security and Net Zero will deliver energy security, consumer security, climate security and economic security.

Clean Power 2030 Action Plan (2024)

2.5.6 The Clean Power 2030 Action Plan (Ref 22) sets out the strategy for a just transition to renewable sources of energy by 2030. It lies out the intersection of different stakeholders and sectors, as well as the need to upgrade energy infrastructure to support clean national electricity generation and distribution. Published in December 2024 by the Department for Energy Security and Net Zero, the Action Plan acknowledges the scale of achieving a clean power system and provides the tools required to achieve it.

National Infrastructure Strategy (2020)

2.5.7 The National Infrastructure Strategy (Ref 23) was published in 2020 and sets out plans to transform UK infrastructure in order to level up the country, strengthen the Union and achieve net zero emissions by 2050. Within this it states: *"The government wants to deliver an infrastructure revolution: a radical improvement in the quality of the UK's infrastructure to help level up the country, strengthen the Union, and put the UK on the path to net zero emissions by 2050".*

Institute of Environmental Management and Assessment (IEMA)

2.5.8 Institute of Environmental Management and Assessment (IEMA) Guide: Assessing Greenhouse Gas Emissions and Evaluating their Significance (Ref 31) provides the latest guidance on addressing GHG emissions assessment, mitigation and reporting in EIA.

2.5.9 IEMA Environmental Impact Assessment Guide to: Climate Change Resilience and Adaptation (Ref 32) provides a framework for the consideration of climate change resilience and adaptation in EIA and reflects lessons learnt from emerging practice along with case studies of good practice.

GHG Protocol

2.5.10 The World Resources Institute (WRI) and World Business Council for Sustainable Development (WBCSD) GHG Protocol Corporate Accounting and Reporting Standard provides overarching guidance on preparing GHG inventories and reporting standards (Ref 33). This guidance is used within the GHG emissions calculation methodology, as described in Section 6.4.

Carbon Management in Infrastructure and Built Environment – PAS 2080 (2023)

2.5.11 PAS 2080 is a global standard for managing carbon in infrastructure and the built environment (Ref 34). It provides a framework for reducing carbon emissions and costs throughout the entire lifecycle of buildings and infrastructure projects, from design and construction to operation and decommissioning. The standard emphasises early collaboration, integrated decision-making, and the consideration of whole-life carbon impacts.

Mission Zero: Independent Review of Net Zero (2023)

2.5.12 In September 2022, the Independent Review of Net Zero was commissioned to review the government's approach to delivering its net zero targets. In 2023, following the conclusion of this review, the UK Government published the Mission Zero: Independent Review of Net Zero final report (Ref 35). The final report aimed to determine how the UK can "*deliver on its net zero commitments by demonstrating how to deliver and implement most effectively and efficiently a plan for our future energy transition*". The review highlights "*the importance of delivering future energy security through the greater use of domestically generated renewable and clean sources of power"* and one of

the 25 key actions for 2025, 'Objective 11: Accelerating Renewables' recommends that taskforce and deployment roadmaps be set up in 2023 for solar energy generation to reach up to 70 gigawatts (GW) by 2035 (i.e., 70,000MW).

3. Local Policy, Guidance, and Plans

3.1.1 Local planning policy documents, neighbourhood plans, and council strategies concerning climate that are relevant to the Proposed Development have been outlined below and policy relevant to these documents are further considered within **Table 5**.

Central Lincolnshire Local Plan (2023)

3.1.2 The Central Lincolnshire Local Plan (Ref 24) was adopted in April 2023 and is a revision of the previous Central Lincolnshire Local Plan that was adopted in 2017. The Local Plan was revised to ensure it remains current and consistent with latest national guidelines and local circumstances. The Local Plan contains planning policies and allocations for the growth and regeneration of Central Lincolnshire over the next 20 years.

Neighbourhood Plans

3.1.3 Bassingham Neighbourhood Plan 2016-2036 (Ref 28) was published in November 2017 and contains a policy specific to renewable energy schemes.

Lincolnshire County Council Green Masterplan 2020-2025

3.1.4 Lincolnshire County Council's Green Masterplan (Ref 25) sets out three guiding principles of how the County will achieve 'net zero carbon' by 2050, in response to climate change. These guiding principles are: "don't waste anything, consider wider opportunities and take responsibility and pride", and these help to bring focus to the Council's work and planning for reducing carbon emissions and adapting to the changing climate.

3.1.5 The Green Masterplan is supported by the Initial Action Plan 2020-2025 (Ref 26) which proposed the development of initial projects to support in achieving national carbon reduction targets.

Lincolnshire County Council Carbon Management Plan 2019

3.1.6 The Carbon Management Plan (Ref 27) considers the importance of carbon management and drivers for tackling Climate Change. It sets out their strategy and action plan for continuing to reduce carbon emissions across the county.

North Kesteven District Council Climate Emergency Strategy and Climate Emergency Action Plan 2024-2025

3.1.7 The Climate Emergency Strategy (Ref 29) sets out the approaches the Council will take, and the actions needed to achieve net zero by 2030. This will include reducing CO_2 emissions from energy to net zero, monitoring

emissions and removals of CO_2 from Land Use, Land Use Change and Forestry and reducing non-CO_2 emissions.

3.1.8 The Climate Emergency Action Plan 2024-2025 (Ref 30) sets out the specific actions that North Kesteven District Council are taking to tackle climate change in this period. The Action Plans are updated every year to reflect changes and progress.

Table 5: Relevant Local Policy and Guidance with respect to Climate Change

Relevant Document	Relevant Policies	Location of information provided to address this
Central Lincolnshire Local Plan (2023)	Policy S11: Embodied Carbon states that from the 1st of January 2025, there will be a requirement for all major development proposals to demonstrate how the design and building materials to be used have been informed by a consideration of embodied carbon, and any reasonable opportunities to minimise embodied carbon have been taken. Policy S14: Renewable Energy states that *"The Central Lincolnshire Joint Strategic Planning Committee is committed to supporting the transition to a net zero carbon future and will seek to maximise appropriately located renewable energy generated in Central Lincolnshire"*, with solar explicitly earmarked as likely development. Policy S16: Wider Energy Infrastructure outlines that the Joint Committee is committed to supporting the transition to net zero and recognises and supports, in principle, the need for significant investment in new energy infrastructure. This policy states *"support will be given to proposals which are necessary for, or form part of, the transition to a net zero carbon sub-region, which could include: energy storage facilities; upgraded or new electricity facilities; or other electricity infrastructure.*	Embodied carbon during the construction stage is measured in the Lifecycle Greenhouse Gas Impact Assessment (Section 6.4) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]**. This section also provides an assessment of the Proposed Development's impact on the UK's net zero pathway and its potential impact on fossil fuels.
Bassingham Neighbourhood Plan 2016-2036	ES5: Renewable Energy Schemes Any proposal requiring a planning application for energy generating schemes and infrastructure using renewable energy sources, and new Renewal Energy Scheme development will be supported in the Neighbourhood Plan Area provided that: • On householder/domestic schemes, and any other schemes located within the Settlement Boundary, the energy generating infrastructure is located as close as practicable and is	The In-Combination Climate Change Impact (ICCI) assessment considers potential consequential impacts from the combined impact of the Proposed Development and climate change as detailed in the Assessment Methodology (Section 6.6) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]**. The ICCI assessment is presented in

Relevant Document	Relevant Policies	Location of information provided to address this
	proportionate to the scale of the existing buildings and proposed development it is intended to serve. • The siting, scale and design of any energy generating infrastructure does not compromise public safety, allows continued safe use of public rights of way, and does not adversely affect existing amenities. • Any technologies and infrastructure used to generate energy should not detract from the rural, visual and historic character of the village and the surrounding landscape setting and environment. • Adjoining land uses are not adversely impacted in terms of noise, vibration, or electromagnetic interference. • Where appropriate the energy generating infrastructure, and its installation complies with the Microgeneration Certification Scheme.	**Appendix 6-C: In-combination Climate Change Impact Assessment** of the ES **[EN010154/APP/6.3]**.
Lincolnshire County Council Green Masterplan 2020-2025	As part of the Lincolnshire County Council's strategy to achieve net zero carbon emissions, the council has identified solar as a key form of renewable energy. It has already been involved in facilitating large-scale solar projects within the county, and the Lincoln Climate Commission has been formed with the aim of making Lincoln zero carbon by 2030.	The Lifecycle Greenhouse Gas Impact Assessment (Section 6.4) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** provides an assessment of the Proposed Development's impact on the UK's net zero pathway and its potential impact on fossil fuels.
Lincolnshire County Council Carbon Management Plan 2019	Section 5 - Action Area: Energy and Lighting Future energy systems planning is required to understand the impact of a transition to decarbonised heat and energy sources as well as potential electricity grid network upgrades. Opportunities also exist to	The Lifecycle Greenhouse Gas Impact Assessment (Section 6.4) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** provides an assessment of the Proposed Development's impact on the UK's net zero

Relevant Document	Relevant Policies	Location of information provided to address this
	work with local partners to unlock area-wide investment and to incorporate local energy generation opportunities.	pathway and its potential impact on fossil fuels.
North Kesteven District Council Climate Emergency Strategy	Section 3: Our Climate Emergency Strategy in Detail Strategic objectives include implementing mitigation measures to reduce CO_2 emissions and enhance adaptation to improve resilience to the effects of climate change.	The Lifecycle Greenhouse Gas Impact Assessment (Section 6.4) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** provides an assessment of the Proposed Development's impact on the UK's net zero pathway and its potential impact on fossil fuels. The Climate Change Risk Assessment of Effects (Section 6.5) of **Chapter 6: Climate Change** of the ES **[EN010154/APP/6.1]** assesses the Proposed Development's vulnerability to climate change.

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