



# One Earth Solar Farm

**Volume 9.0: Post-Submission Documents**

**Policy Compliance Document Addendum**

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# 1. Introduction

## 1.1 Purpose of this Document

1.1.1 This document constitutes an addendum to the **Policy Compliance Document [EN010159/APP/5.6]** [APP-169] that was submitted with the Application to account for:

- Updates to the National Policy Statements ('NPSs') for Energy which were published for consultation in April 2025; and

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 the 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 **Policy Compliance Document [EN010159/APP/APP/5.6]** [APP-169] 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 Action Plan, which was also published after the submission of this Application. The Clean Power 2030 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.

## 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. These revisions sought to:

- Embed Clean Power 2030 Action Plan 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 understood that the updated NPSs for Energy will be laid in parliament for approval and later designated before the end of 2025. The Applicant considers that the current updates proposed at this stage are of limited relevance to the Secretary of State's decision-making for this DCO Application and in any case the changes proposed in relation to the consideration of solar NSIPs are not material.

2.1.3 The proposed updates, allows for the process of delivering major new infrastructure in both England and Wales to be strengthened, ultimately reinforcing the government's ambition to deliver both Clean Power by 2030 and Net Zero by 2050.

2.1.4 The NPSs of relevance to the Proposed Development include:

- Draft Overarching Energy National Policy Statement for Energy (EN-1)
- Draft National Policy Statement for Renewable Energy Infrastructure (EN-3)
- Draft National Policy Statement for Electricity Networks Infrastructure (EN-5)

2.1.5 The NPSs state that for any application accepted for examination before designation of the updated energy NPSs, (such as One Earth Solar Farm) the original suite of energy NPSs 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. This is further set out within draft EN-1 paragraphs 1.6.1 to 1.6.3 which states:

*“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”.*

- 2.1.6 Draft NPS EN-1 incorporates the Government’s aim to deliver Clean Power by 2030, replacing previous policy and strategy aims, and confirms at paragraph 2.3.2 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”*. 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.
- 2.1.7 Paragraph 3.3.3 and 2.3.6 of 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, especially as demand for electricity “could more than double by 2050” to reach net zero.
- 2.1.8 The draft NPS EN-1 has been updated to reintroduce onshore wind technology into the definition of energy generating stations that may qualify as nationally significant infrastructure projects (NSIPs) under section 15 of the Planning Act 2008. This proposed change will take effect when the Infrastructure Planning (Onshore Wind and Solar Generation) Order 2025 (the 2025 Order) comes into force, which is proposed for 31 December 2025.
- 2.1.9 Critical National Priority (CNP) Infrastructure policy has been included within the 2024 NPSs and it applies to both 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.

- 2.1.10 Further to the changes of the CNP policy, while 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 now do not meet the definition of clean power technology.
- 2.1.11 Other than the two aforementioned policy changes, the CNP policy included in the 2025 NPS revisions remains the same as in the 2024 NPSs.
- 2.1.12 Government's Clean Power Capacity Ranges establish a framework to support the delivery of government's Clean Power target and reflect at paragraph 3.2.3 of draft NPS EN-1 that "there is no singular path to achieving clean power, but instead, that there are a range of scenarios that could get us there".
- 2.1.13 The government goes on to state at paragraph 3.3.22 of draft NPS EN-1 that the capacity ranges will vary over time: "over 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."
- 2.1.14 Paragraph 2.3.4 of Draft NPS EN-1 further goes on to clarify that the government "*does not consider it appropriate for planning policy to set limits on different technologies, but planning policy can be used to support the government's ambitions in energy policy and other policy areas*". 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.
- 2.1.15 Paragraphs 3.2.9 and 3.2.10 of draft NPS EN-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.
- 2.1.16 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.

- 2.1.17 The changes shown within draft NPS EN-3 are similar to the updates of policy aims included within draft NPS EN-1 and similar to the adopted NPS EN-3. Additionally, paragraphs 2.10.1 and 2.10.2 of EN-3 notes that the government states that the UK has huge potential for solar power and that solar energy is at the heart of the CP2030 Mission. The Applicant's Statement of Need is consistent with both the adopted NPS EN-3 and draft NPS EN-3.
- 2.1.18 In summary, the Proposed Development does not result in any significant change to the planning balance outlined in the **Planning Statement [EN010159/APP/5.5]** [APP-168], when assessed against the draft NPSs EN-1 and EN-3. The draft NPSs introduce no new considerations that would affect the assessment or the application of relevant tests by the Secretary of State under the existing NPSs.
- 2.1.19 As such, the currently adopted NPSs remain the principal foundation for decision-making under section 104(2)(a) of the Planning Act 2008. While the draft NPSs, currently subject to consultation, may be given some weight as a relevant consideration under section 104(2)(d), they do not materially impact the planning balance or change the conclusions previously reached for the Proposed Development.

### 3. Planning Balance

- 3.1.1 The updated draft suite of Energy NPSs emphasize the urgent need to deliver new low-carbon and renewable energy infrastructure. Solar energy is highlighted as central to the Government's Clean Power 2030 mission and ultimately plays a crucial role in providing low-cost, efficient energy solutions. Alongside strategic planning and improved grid infrastructure in unconventional locations, the proposed changes to the revised NPSs (under consultation) demonstrate continued strong governmental commitment to expanding renewable energy, in line with net-zero goals.
- 3.1.2 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 adaptable to market changes and demands. The revisions reflect the government's strategic framework for delivering a clean energy system, which includes the Clean Power 2030 Action Plan, the Strategic Spatial Energy Plan, and the Centralised Strategic Network Plan. The Government has set a Capacity Range of 45–47 GW of solar capacity by 2030, excluding an additional estimate 9-10 GW of rooftop solar projects which government expect to be deployed before 2030. At the time of the Clean Power 2030 Action Plan's publication, installed solar capacity in Great Britain was estimated at 17 GW. This underscores the vital role of large-scale solar in achieving the government's net-zero targets and supports the pressing need for the Proposed Development.
- 3.1.3 The Proposed Development aligns with relevant planning policy and other considerations that the Applicant deems both important and relevant to the Secretary of State's decision on whether to grant development consent. It represents a carefully planned and efficiently designed response to the urgent and growing need for low-carbon energy infrastructure, while also taking into account local environmental sensitivities. Having assessed the draft Energy NPSs and the adopted National Planning Policy Framework (NPPF, December 2024), no material change to the planning balance has been identified.
- 3.1.4 Therefore, it is concluded that the Development Consent should be granted, and there are no material changes to the planning balance of the Proposed Development.





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