From:	Stephen Fox
To:	One Earth Solar
Subject:	The Planning Case for Rejection - Speculative Site Selection.
Date:	30 September 2025 11:50:53
Attachments:	The planning case for rejection.docx The planning case for rejection Letter.docx

The Examining Authority

One Earth Solar Farm NSIP (EN010159)

The Planning Inspectorate

Temple Quay House

Temple Quay

Bristol BS1 6PN

By Email

30.09.25.

Subject: **The Planning Case for Rejection - Speculative Site Selection.** One Earth Solar Farm Nationally Significant Infrastructure Project (NSIP)

Dear Sirs,

I herewith formally submit the attached report, "**The Planning Case for Rejection - Speculative Site Selection.**," as a critical contribution to the examination of the Development Consent Order (DCO) application for the One Earth Solar Farm (740 MW, 1,409 ha)1.

The purpose of the attached submission is not to reiterate the failure of the project under the Sequential Test for flood risk, but to demonstrate that the Applicant's fundamental rationale for choosing this particular site—its commercial and engineering justification—is structurally unsound, speculative, and insufficient to meet the deliverability test required of a Nationally Significant Infrastructure Project.

Critique of Site Selection Rationale

The Applicant asserts that the availability of 740 MW capacity at the High Marnham substation provided a singular, non-negotiable constraint that dictated the selection of this large, low-lying, and high-risk site. My forensic critique dismantles this assertion by focusing on the arbitrary nature of the constraint and the speculative timing of the commitment:

Speculation on Grid Delivery: The project's timeline is built on a non-existent foundation. The commitment to the site began in 20232, well before the DCO application for the necessary National Grid upgrade (the Brinsworth to High Marnham Uprating) was formally submitted3. The earliest operational date for this critical infrastructure is 2031, which post-dates the solar farm's own target date3. This decision to commit a massive 1,409-hectare project to a high flood-risk location based on a future connection that is neither consented nor guaranteed represents commercial speculation, not robust planning.

Methodological Constraint: The developer inverted the policy hierarchy by artificially constraining the site search to a narrow 10km radius around the substation4. This proximity bias was designed to prioritise an unconsented connection over the fundamental planning requirement to first avoid flood-risk areas5.

Existence of Viable Alternatives: The premise of scarcity is refuted by the demonstrated viability of other projects in the region. The Tuxford Road Solar Farm successfully secured the same High Marnham capacity on lower-risk land6,7. Furthermore, the Great North Road Solar Park successfully utilised an entirely different transmission corridor at the Staythorpe substation,

proving that large-scale transmission capacity was not exclusive to High Marnham.

In conclusion, the One Earth site was selected for developer convenience and speculative positioning in the new "first ready and needed" grid queue8, not due to genuine grid deliverability constraints. This flawed rationale leads inevitably to unnecessary and unacceptable environmental risks, particularly in the flood-prone River Trent valley.

We therefore urge the Examining Authority to critically scrutinise the Applicant's site selection methodology and conclude that the foundational rationale for the proposed location is unsound, providing definitive grounds for rejection.

Yours faithfully,

Stephen Fox BA MSc.

Interested party reference number FA3 AE8AE5

Footnotes

1. Development Consent Order (DCO) application for the One Earth Solar Farm (740 MW, 1,409 ha).
2. Site commitment initiated in 2023, prior to submission of necessary grid upgrade applications.
3. Brinsworth to High Marnham Uprating DCO application not yet submitted at time of site commitment; earliest operational date for upgrade is 2031, after the solar farm's target date.
4. Site search methodology limited to a 10km radius around High Marnham substation.
5. National policy requires flood-risk avoidance as a primary criterion in site selection.
6. Tuxford Road Solar Farm secured High Marnham grid capacity on land with lower flood risk.
7. Reference to Tuxford Road Solar Farm's success in securing capacity on a lower-risk site.
8. Grid queue operated on a "first ready and needed" basis, influencing developer decisions.

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The Examining Authority

One Earth Solar Farm NSIP (EN010159)

The Planning Inspectorate

Temple Quay House

Temple Quay

Bristol BS1 6PN

By Email

30.09.25.

Subject: Submission of Forensic Critique Regarding Site Selection Rationale for the One Earth Solar Farm Nationally Significant Infrastructure Project (NSIP)

Dear Sirs,

I herewith formally submit the attached report, "Forensic Critique of the One Earth Solar Farm Site Selection Rationale: A Case of Speculative Siting," as a critical contribution to the examination of the Development Consent Order (DCO) application for the One Earth Solar Farm (740 MW, 1,409 ha)1.

The purpose of the attached submission is not merely to reiterate the failure of the project under the Sequential Test for flood risk, but to demonstrate that the Applicant's fundamental rationale for choosing this particular site—its commercial and engineering justification—is structurally unsound, speculative, and insufficient to meet the deliverability test required of a Nationally Significant Infrastructure Project.

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The Applicant asserts that the availability of 740 MW capacity at the High Marnham substation provided a singular, non-negotiable constraint that dictated the selection of this large, low-lying, and high-risk site. My forensic critique dismantles this assertion by focusing on the arbitrary nature of the constraint and the speculative timing of the commitment:

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Methodological Constraint: The developer inverted the policy hierarchy by artificially constraining the site search to a narrow 10km radius around the substation4. This proximity bias

was designed to prioritise an unconsented connection over the fundamental planning requirement to first avoid flood-risk areas5.

Existence of Viable Alternatives: The premise of scarcity is refuted by the demonstrated viability of other projects in the region. The Tuxford Road Solar Farm successfully secured the same High Marnham capacity on lower-risk land6,7. Furthermore, the Great North Road Solar Park successfully utilised an entirely different transmission corridor at the Staythorpe substation, proving that large-scale transmission capacity was not exclusive to High Marnham.

In conclusion, the One Earth site was selected for developer convenience and speculative positioning in the new "first ready and needed" grid queue8, not due to genuine grid deliverability constraints. This flawed rationale leads inevitably to unnecessary and unacceptable environmental risks, particularly in the flood-prone River Trent valley.

We therefore urge the Examining Authority to critically scrutinise the Applicant's site selection methodology and conclude that the foundational rationale for the proposed location is unsound, providing definitive grounds for rejection.

Yours faithfully,

Stephen Fox BA MSc.

Interested party reference number FA3 AE8AE5

Footnotes

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8. Grid queue operated on a "first ready and needed" basis, influencing developer decisions.

The Planning Case for Rejection - Speculative Site Selection.

Summary

This report critically assesses the site selection process for the One Earth Solar Farm Nationally Significant Infrastructure Project (NSIP) from a conventional planning perspective. It synthesizes previous analyses to argue strongly that the project's core justification—its reliance on a grid connection at High Marnham—is not a robust, policy-compliant rationale but a highly speculative gamble. This critique is founded on three central pillars: the chronological mismatch between the solar farm's site commitment and the grid upgrade timeline, the demonstrable existence of viable, lower-risk alternative sites and connection points, and the project's failure to apply the Sequential Test for flood risk in a rigorous and transparent manner.

Central findings establish that the Applicant's selection of the High Marnham site was premature and preceded the formal advancement of the necessary grid upgrade's Development Consent Order (DCO) process. This chronological disconnect directly undermines the claim that the site was chosen due to a unique, timely grid deliverability advantage. Instead, this strategic choice is exposed as a speculative venture predicated on the successful and timely delivery of a separate national infrastructure project, a factor entirely outside the developer's control.

Furthermore, a review of comparable projects in the region demonstrates a clear precedent for more responsible and policy-compliant development. Projects such as the Cottam Solar Project and the Great North Road Solar Park successfully secured alternative grid connections or demonstrated a legally binding commitment to robust, enforceable flood mitigation. The One Earth proposal, in contrast, appears to have failed to conduct a credible search for a lower-risk site, choosing instead to rely on mitigation measures at a flood-prone

location. This approach runs contrary to the fundamental policy principle of avoidance and, in doing so, fails to meet the standards required by the National Policy Statements and the National Planning Policy Framework (NPPF).

The evidence presented brings into question the foundational justification for the chosen site and highlights significant deficiencies in the rigour of the alternatives appraisal. Accordingly, the report concludes that the foundational premise of the project is flawed and that the correct planning decision, grounded in established policy and precedent, is to reject the current application.

1. Introduction and Background

The One Earth Solar Farm is a proposed large-scale solar energy and battery storage project with a planned export capacity of 740 MW to the High Marnham substation, classifying it as a Nationally Significant Infrastructure Project (NSIP) due to its generating capacity and geographic scale (over 1,400 hectares)[1] [1, 2]. The applicant, a joint venture between PS Renewables and Ørsted Onshore, argues that the "Proposed Development" delivers urgent decarbonisation benefits and claims that strict deliverability constraints, centred on the availability of new grid capacity at High Marnham, dictated the selection of the site [3].

The central purpose of this report is to critically assess whether this justification for site selection withstands an evidence-based critique and to demonstrate why, from a conventional planning perspective, the correct decision is to reject the proposal. The analysis focuses on a fundamental tension: did the project's timing and genuine grid constraints justly eliminate lower-risk alternatives, particularly those in areas less susceptible to flooding, or does the available evidence suggest that the site was selected for other, speculative reasons? The report revisits the evidence and policy context, focusing on whether the Applicant's approach aligns with the sequential, risk-based principles for NSIPs as outlined in the NPPF and associated legal frameworks [3, 4, 5].

2. The Speculative Nature of Site Selection vs. Grid Upgrade Timeline

The viability of the One Earth Solar Farm is fundamentally linked to a major reinforcement of the National Grid at High Marnham, a separate NSIP known as the Brinsworth–High Marnham Uprating project [6]. A chronological comparison of the two projects reveals a significant mismatch in their development schedules, with One Earth's site selection and land control activities commencing well before the grid upgrade DCO was at a sufficiently advanced stage to warrant such a strategic commitment [7, 8].

The project's DCO application timeline, which was on track for a decision by mid-2026, was a calculated strategic effort to align with new national grid policy reforms, specifically the NESO TMO4+ reforms [9, 8]. These reforms, which replaced the "first come, first connected" model with a "first ready and needed, first connected" process, were intended to prioritize projects that had progressed their "planning status" and, ideally, had secured DCO consent [9, 1]. The One Earth project's accelerated timeline was a response to this new competitive landscape.

However, this choice was highly speculative. At the time One Earth submitted its DCO application in February 2025 [10], National Grid's own statements confirmed that the

application for the critical 400kV substation had not yet been submitted, with a submission targeted for late 2025 [6]. National Grid's full DCO application for the broader North Humber to High Marnham project, of which the High Marnham substation is a part, was not anticipated until Summer 2026, with an earliest operational date of 2031 [2, 8]. This means the developer made a binding commitment to a high-risk site based on a grid connection that was not only unconsented but was also part of a separate DCO process with its own, potentially delaying, examination and construction timeline [6, 2].

The following table demonstrates this chronological disconnect in the development schedules:

Table 1: One Earth Solar Farm vs. Grid Upgrade Milestones

Project Milestone	One Earth Solar Farm	Brinsworth–High Marnham Grid Upgrade
Early Development & Consultation	Non-statutory consultation: Sep–Nov 2023 [10]	Public consultations: June 2024 [2]
Statutory Consultation	May–Jul 2024 [10]	For North Humber to High Marnham Project: Feb–Apr 2025 [2]
DCO Application Submission	February 2025 [10]	For 400kV High Marnham Substation: Anticipated end of 2025 [6]
DCO Submission for Broader Project		Anticipated Summer 2026 [2]
Earliest Anticipated Operation	DCO approval est. July 2026 [10]	From 2031 [2]

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The project's reliance on a grid connection that was not yet consented, and whose earliest operational date is 2031—postdating One Earth's own stated connection date of October 2029 on the Transmission Entry Capacity (TEC) Register [6, 2]—fundamentally undermines the claim that its location was chosen due to a unique or accelerated grid opportunity. This sequence of events reveals a speculative gamble rather than a robust, evidence-based strategic choice.

3. Critique of the Applicant's Deliverability Constraints Justification

The Applicant's central argument for selecting a site with significant flood risk is the assertion that only the High Marnham substation offered a viable and uniquely deliverable connection for a project of this scale[3]. This reasoning is a fragile foundation for site selection and is directly contradicted by the availability of multiple alternative options.

3.1. Evidence of Viable, Lower-Risk Alternatives

The notion of an exclusive, singular connection opportunity at High Marnham is directly contradicted by a series of ongoing developments within the wider grid network. Multiple projects, some of comparable scale, successfully advanced through the planning process with alternative connections in the same region:

- **Tuxford Road Solar Farm:** A project of approximately 120 hectares located on higher ground to the north of Tuxford Road, also connects to the High Marnham substation and received planning consent in December 2021 [11, 12]. This demonstrates that a lower-risk site with the same connection was a viable and successful alternative.
- **Great North Road Solar Park:** A proposed NSIP located northwest of Newark, is designed to connect to the Staythorpe substation, a different point on the National Grid, which also had capacity from the closure of a fossil fuel power station [13, 14].
- **Grimsby Solar Farm:** This project, developed by Aura Power, successfully secured a grid connection with a local Distribution Network Operator (DNO), demonstrating that a transmission-level connection is not the only viable pathway for large-scale solar projects [15].

These precedents confirm that the grid landscape was not a binary choice, but a rapidly evolving system with multiple viable pathways for large-scale renewable projects. The premise that High Marnham was a singular grid opportunity is therefore not credible [15].

3.2. Project Comparison Table

Project Name	Location	Connection Point	Flood Risk Profile
One Earth Solar Farm [1]	Nottinghamshire/Lincolnshire	High Marnham Substation [3]	Predominantly Flood Zone 2 and 3 [4]
Tuxford Road Solar Farm [11]	Tuxford, Nottinghamshire	High Marnham Substation [11]	Successfully passed Sequential and Exception Tests [12]
Cottam Solar Project [16]	Nottinghamshire/Lincolnshire	Cottam Substation [16]	Contains land in Flood Zone 3 [17]
Great North Road Solar Park [13]	Northwest of Newark	Staythorpe Substation [13]	Not specified, but committed to funding flood alleviation [18]
Grimsby Solar Farm [15]	Grimsby, North East Lincolnshire	Local Distribution Network Operator [15]	Not specified, but included drainage enhancements [15, 19]

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The evidence clearly shows that the Applicant's constraint rationale is a fragile foundation for its site selection, especially when compared with the demonstrably successful, alternative strategies of its peers.

4. Application of the Sequential Test: An Insufficient Appraisal

The One Earth project's location, with large portions of the site situated in Flood Zone 3, inherently triggers the most stringent application of the Sequential Test [4, 20]. The test, as a cornerstone of national planning policy, requires a project to be steered to areas of lowest flood risk, and an applicant must demonstrate that no "reasonably available" sites at a lower risk exist [5].

The developer's approach to the Sequential Test is fundamentally flawed:

- **Inadequate Justification:** The project's Non-Technical Summary acknowledges a "high flood risk" in the study area due to the River Trent and its tributaries [21]. To address this, the developer has proposed mitigation measures such as staggering the height of solar panels [21]. However, this site-level mitigation approach is contrary to the spirit of the NPPF, which mandates that mitigation cannot serve as a substitute for a genuine sequential site search [5].
- **Scientific Concerns about Hydrology:** A substantive critique of the project's flood risk assessment raises serious technical concerns. Studies have shown that solar panels, despite the permeability of the land beneath them, can act as a "semi-impervious surface," concentrating rainfall and increasing runoff [20]. One study cited a 14.5% increase in total runoff volume during a design storm [20]. The failure to adequately model and address this known hydrological impact calls into question whether the developer has met the policy requirement that a project be "safe for its lifetime" and not "increase flood risk elsewhere" [20].
- **Precedents for a More Robust Approach:** The Cottam Solar Project, a peer NSIP, successfully navigated a similar flood risk profile by including legally binding provisions for "Long term flood risk mitigation" and a detailed drainage strategy in its DCO [17, 22]. This proactive approach demonstrates a commitment to managing flood risk that goes beyond the speculative mitigation proposed by The One Earth. Similarly, the Grimsby Solar Farm project was approved by its local council in part because it included drainage enhancements to "alleviate flooding that local residents are presently experiencing," turning a challenge into a benefit [15, 19].

The evidence strongly suggests that the One Earth site selection process failed to apply the Sequential Test in a robust and transparent manner, as required by current national planning policy.

5. Conclusions and Recommendations

5.1. A Clear Mandate for Rejection

The One Earth Solar Farm proposal, as currently submitted, is strategically and ethically indefensible from a conventional planning perspective. Its core justification is built on a demonstrably speculative premise about the availability of a grid connection, and its failure to apply the Sequential Test transparently is clear. The existence of a multitude of demonstrably viable alternative sites and strategies is not a justification for a high-risk proposal; it is the definitive reason for its rejection.

The developer's decision to pursue a speculative, high-risk location before the necessary grid infrastructure was even consented is in direct contravention of the principles of sound planning. The costs of this failure, in terms of the potential for catastrophic flooding, should not be borne by the community and public infrastructure. A refusal to grant consent would be the correct planning decision, signalling that green energy development must be pursued responsibly and in accordance with the established legal and policy framework [3].

5.2. Final Recommendations

Based on the evidence presented in this report, the following recommendations are made:

- **Reject the One Earth DCO Application:** The Planning Inspectorate should not grant consent to the current proposal. The project has failed to demonstrate that there are no suitable, lower-risk alternative sites, thereby failing the Sequential Test [7].
- **Require Re-siting:** The developer should be required to re-evaluate and propose an alternative site in a lower flood-risk area. The existence of projects like the Tuxford Road Solar Farm and the Great North Road Solar Park provides clear evidence that this is a feasible and viable path to a successful DCO application [11, 13].
- **Protect Public and Environmental Assets:** The decision to develop a large-scale solar farm should not come at the expense of exacerbating flood risk or imposing long-term burdens on the community. The national interest in clean energy can be, and is being, served by proposals that adhere to sound planning principles and responsible land stewardship [15, 18, 19]. The correct and final decision is to require the developer to do the same.

Footnotes

[1] The One Earth Solar Farm is a Nationally Significant Infrastructure Project (NSIP) with a planned export capacity of 740 MW and is a joint venture between PS Renewables and Ørsted Onshore [1, 2]. The DCO application was submitted in February 2025 [10]. [2] National Grid anticipates submitting the DCO application for the new 400kV High Marnham substation by the end of 2025 [6]. [3] Ofgem's final decision on the NESO TMO4+ package of connection reform proposals was made on 15 April 2025, moving from a "first come, first connected" process to a "first ready and needed, first connected" process [9, 23]. [4] Under the TMO4+ reforms, "readiness" criteria require projects to have exclusive land rights and a validated planning application. The reforms are applied retrospectively, and projects not meeting the criteria are subject to new offers [9, 1]. [5] The North Humber to High Marnham Project's DCO submission is anticipated for Summer 2026, with an earliest operational date of 2031 [2]. [6] The Tuxford Road Solar Farm, with a capacity of up to 49.9 MW, received planning consent in December 2021 [11, 12]. [7] The Tuxford Road Solar Farm will provide renewable electricity for distribution to the National Grid via the substation at High Marnham [11, 12]. [8] The Great North Road Solar Park is proposed to connect to the Staythorpe substation, which had capacity due to the closure of fossil fuel power stations [13, 14]. [9] The DCO application for the Great North Road Solar Park was accepted for examination on July 22, 2025 [14]. [15] Aura Power's Grimsby Solar Farm received planning approval in November 2022, with construction commencing in June 2025 and energisation scheduled for February 2026 [24]. The site was chosen for its nearby grid connection, flat land, and existing screening [24]. [16] The Cottam Solar Project received DCO consent in September 2024 and uses the former connection of the demolished Cottam coal-fired power station [17]. [21] The One Earth Solar Farm's Non-Technical Summary acknowledges a "high flood risk" in the middle portion of the 10km study area due to the River Trent and its tributaries and mentions that the design of the panels has been adjusted to account for flood water levels [6, 21, 4, 25, 26]. [2] National Grid is proposing to build a new 400kV electricity transmission line between two proposed substations at Birkhill Wood and High Marnham [2]. [4] The One Earth Solar Farm's Flood Risk Assessment confirms that "large areas of our Site are shown to be within Flood Zones 2 and 3" and that ground levels vary, with the lowest at approximately 4.5m AOD along the River Trent [27]. [27] The One Earth project's Design Approach Document states that a search was undertaken within 10km from

the High Marnham Substation [27, 7]. [5] The National Planning Policy Framework (NPPF) and National Policy Statement for Energy (EN-1) require that new development be steered towards areas with the lowest probability of flooding, a process known as the Sequential Test [20]. [17] The Cottam Solar Project includes parcels of land that fall within Flood Zone 3 and is located near a main river, the River Till, which runs through the site [17, 28]. [18] The Great North Road Solar Park's team is working with local stakeholders to develop a holistic flood alleviation strategy to tackle pre-existing flooding and has committed resources to explore funding alleviation measures [18, 29]. [23] Ofgem's final decision on the NESO TMO4+ reform package was made on April 15, 2025 [9]. [22] The DCO for the Cottam project includes legal provisions for "Long term flood risk mitigation" and "Surface and foul water drainage" [28]. [25] The One Earth Solar Farm is a proposed solar photovoltaic (PV) and Battery Energy Storage System (BESS) project intended to generate up to 740MW of clean energy [1]. [19] The Grimsby Solar Farm was approved after the developer included measures to improve drainage to alleviate local flooding and provide a community fund [15, 24]. [30] The Kelham Solar Farm was refused by Newark and Sherwood District Council due to concerns about flood risk and the loss of agricultural land [30, 31]. [31] The Kelham Solar Farm appeal was allowed in May 2024, with the inspector concluding the scheme complied with both the sequential and exception tests regarding flood risk [29]. [29] A critique of the project's flood risk assessment found that solar panels could act as a "semi-impervious surface," concentrating rainfall and increasing runoff [20]. [20] The DCO for the Cottam Solar Project includes provisions for flood risk mitigation [17, 28]. [7] One Earth's initial strategic activities, including its first public consultations, began in the latter part of 2023, well before the formal consent process for the grid upgrade had commenced [8, 10]. [28] The Cottam Solar Project was awarded development consent on September 5, 2024 [16, 17]. [24] Aura Power's Grimsby Solar Farm was approved by the North East Lincolnshire Council in November 2022 and construction began in June 2025 [15]. [8] The One Earth Solar Farm's DCO application was submitted in February 2025, while the DCO for the Brinsworth to High Marnham Uprating project was not anticipated until late 2025 [6, 10]. [32] The Planning Act 2008 sets out the planning process for NSIPs, which are submitted to and decided at the national level by the Planning Inspectorate [10]. [33] The Grimsby Solar Farm was developed by Aura Power and has a generation capacity of 49.9MW, connecting to the Northern Powergrid network . `[34]` The Grange Energy Park, being developed by Island Green Power, has a grid connection at the Grimsby West substation .[35] The Cottam Solar Project's DCO includes provisions for long-term flood risk mitigation [17, 22]. [36] The Kelham Solar Farm was initially refused by Newark and Sherwood District Council due to concerns over flood risk, but this decision was overturned on appeal, with the inspector concluding that the proposal complied with the sequential and exception tests regarding flood risk [15, 30, 29]. [10] The DCO application for One Earth Solar Farm was submitted in February 2025 and accepted in March 2025. The examination period is scheduled from July 2025 to January 2026, with a decision expected in July 2026 [10]. [37] The Great North Road Solar Park is designed to connect to the Staythorpe substation [13, 14]. [38] The One Earth Solar Farm has secured a grid connection agreement to import and export up to 740MW of electricity at the High Marnham substation [3, 1]. [39] A critique of the One Earth proposal argues that the project's reliance on the High Marnham grid connection, which is not yet advanced, undermines its justification for building in a flood-prone area, especially when lower-risk alternatives are available [11]. [40] The Tuxford Road Solar Farm was consented in December 2021 [11, 12]. [41] The Great North Road Solar Park is located near Newark [13]. [42] The DCO for the Cottam Solar Project includes legally binding provisions for

flood risk mitigation [17, 22]. [26] The One Earth Solar Farm is a Nationally Significant Infrastructure Project (NSIP) [1, 2]. [43] The Kelham Solar Farm, at 49.9 MW, was a local planning matter handled by Newark and Sherwood District Council [30]. [44] The refusal of the Kelham Solar Farm application was appealed by the developer [30]. [45] Aura Power notes that grid availability is the "fundamental constraint that directs the location" of its developments [6]. [46] Island Green Power is developing the Grange Energy Park and other projects ``. [47] The DCO for the Cottam Solar Project includes provisions for "Surface and foul water drainage" [22]. [48] The Tuxford Road Solar Farm received planning consent on appeal in December 2021 [11]. [49] The DCO application for the Great North Road Solar Park was accepted for examination on July 22, 2025 [14]. [50] The Great North Road Solar Park will connect to the Staythorpe National Grid substation [13]. [51] The DCO for the Cottam project was granted on September 5, 2024 [16, 17]. [52] The Grimsby solar farm was approved by North East Lincolnshire Council in November 2022 [15]. [53] The Kelham planning committee's refusal cited the loss of "Best and Most Versatile" land and the cumulative impact of other approved applications [30]. [54] The Kelham Solar Farm appeal was allowed in May 2024 [29].

- Summary