



# Meridian Solar Farm

EN010169

Volume 6

Environmental Statement

6.3 ES Appendix 7-1:  
Climate Change Legislation,  
Policy and Guidance

APFP Regulation 5(2)(a)

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

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# 1. Introduction

## 1.1. Purpose of this Appendix

- 1.1.1. This Environmental Statement (ES) appendix identifies and describes the legislation, policy and supporting guidance considered relevant to the assessment of the likely significant effects of Meridian Solar Farm (hereafter referred to as 'the Scheme') with regards to **ES Chapter 7: Climate Change** (Doc Ref. 6.1). Policy is considered at both national and local levels.
- 1.1.2. This appendix does not assess the Scheme against legislation and policy, instead the purpose of considering legislation and policy in the EIA is twofold:
- To identify legislation and policy that could influence the sensitivity of receptors (and therefore the significance of effects) and any requirements for mitigation; and
  - To identify legislation and policy that could influence the methodology of the EIA and signposting where this is dealt with in the ES. For example, a policy may require the assessment of an impact or the use of a specific methodology.
- 1.1.3. Instead, policy compliance is assessed within the **Planning Statement** (Doc Ref. 7.1).
- 1.1.4. The following sections identify and describe the legislation, policy and supporting guidance considered specifically relevant to the climate change assessment, which have been taken into account in preparing **ES Chapter 7: Climate Change** (Doc Ref. 6.1).

## 2. Legislation

### 2.1. Paris Agreement

- 2.1.1. The Paris Agreement (2015)<sup>1</sup> 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)<sup>2</sup> 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 NDC 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<sup>3</sup>. 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<sup>4</sup>.

### 2.2. Climate Change Act 2008 and Climate Change Act (2050 Target Amendment) Order 2019

- 2.2.1. The Climate Change Act 2008<sup>5</sup> established a binding target for the UK to reduce greenhouse gas emissions by at least 80% from 1990 levels by 2050. Section 1 of the Climate Change Act 2008 was amended in 2019 through the

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<sup>1</sup> United Nations (2015). The Paris Agreement. Available at: <https://unfccc.int/process-and-meetings/the-paris-agreement>. [Accessed 10 October 2025]

<sup>2</sup> Department for Energy Security & Net Zero (DESNZ) (2020). United Kingdom of Great Britain and Northern Ireland’s Nationally Determined Contribution. Available at: <https://unfccc.int/documents/267241> [Accessed 10 October 2025]

<sup>3</sup> DESNZ (2022). UK’s Nationally Determined Contribution, updated September 2022. Available at: <https://www.gov.uk/government/publications/uks-2035-nationally-determined-contribution-ndc-emissions-reduction-target-under-the-paris-agreement>. [Accessed 10 October 2025]

<sup>4</sup> DESNZ (2025). UK’s Nationally Determined Contribution, updated 2025. Available at: <https://www.gov.uk/government/publications/uks-2035-nationally-determined-contribution-ndc-emissions-reduction-target-underthe-paris-agreement> [Accessed 10 October 2025]

<sup>5</sup> Climate Change Act 2008. Available at: <https://www.legislation.gov.uk/ukpga/2008/27/contents> [Accessed 10 October 2025]

Climate Change Act 2008 (2050 Target Amendment) Order 2019<sup>6</sup> to revise the target at least 80% lower emissions than 1990 baseline and increase the target to at least 100%.

### 2.3. The Carbon Budgets Order 2009<sup>7</sup> , 2011<sup>8</sup> , 2016<sup>9</sup> and 2021<sup>10</sup>

2.3.1. This target is reinforced by a series of legally binding five-year “carbon budgets” that limit GHG emissions over specific periods, with oversight by an independent advisory body, the Climate Change Committee (CCC).

### 2.4. The Infrastructure Planning (Environmental Impact Assessment (EIA)) Regulations 2017

2.4.1. The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017<sup>11</sup> Section 5(2) and Schedule 4, paragraphs 4 and 5 set out that an EIA should describe and assess (in an appropriate manner and in light of each individual case) the direct and indirect significant effects of the Scheme on the climate.

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<sup>6</sup> Climate Change Act 2008 (2050 Target Amendment) Order 2019/1056. Available at: <https://www.legislation.gov.uk/ukdsi/2019/9780111187654> [Accessed 10 October 2025]

<sup>7</sup> The Carbon Budgets Order 2009. Available at: <https://www.legislation.gov.uk/uksi/2009/1259/contents/made>. [Accessed 10 October 2025]

<sup>8</sup> Carbon Budget Order 2011. Available at: <https://www.legislation.gov.uk/uksi/2011/1603/made>. [Accessed 10 October 2025]

<sup>9</sup> The Carbon Budget Order 2016. Available at: <https://www.legislation.gov.uk/uksi/2016/785/contents/made>. [Accessed 10 October 2025]

<sup>10</sup> The Carbon Budget Order 2021. Available at: <https://www.legislation.gov.uk/uksi/2021/750/contents/made>. [Accessed 10 October 2025]

<sup>11</sup> The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. Available at: <https://www.legislation.gov.uk/uksi/2017/572/contents/made>. [Accessed 10 October 2025]

### 3. National Policy Statements

- 3.1.1. The EIA has been undertaken with reference to the following National Policy Statements (NPSs), which are relevant to the Scheme:
- Overarching National Policy Statement for Energy (NPS EN-1)<sup>12</sup>;
  - National Policy Statement for Renewable Energy (NPS EN-3)<sup>13</sup>; and
  - National Policy Statement for Electricity Networks Infrastructure (NPS EN-5)<sup>14</sup>.
- 3.1.2. The NPSs set out the Government's energy policy for the 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 Scheme, and how the Secretary of State should consider these impacts and any mitigation measures applied.
- 3.1.3. The relevant NPS requirements for Climate Change are provided in Table 3-1, along with an indication of where in the ES this information can be sourced.

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<sup>12</sup> DESNZ (2025). Overarching NPS for Energy (NPS EN-1). Available at: <https://assets.publishing.service.gov.uk/media/695d1015f41883f4e50ed9ab/overarching-national-policy-statement-for-energy-en-1-web-accessible.pdf> [Accessed 09 January 2026]

<sup>13</sup> DESNZ (2025). NPS for Renewable Energy Infrastructure (NPS EN-3). Available at: <https://assets.publishing.service.gov.uk/media/695d1368b5c46330350ed9a2/national-policy-statement-for-renewable-energy-infrastructure-en-3-web-accessible.pdf> [Accessed 09 January 2026]

<sup>14</sup> DESNZ (2025). NPS for Electricity Networks (NPS EN-5). Available at: <https://assets.publishing.service.gov.uk/media/695d12e1b5c46330350ed9a1/national-policy-statement-for-electricity-networks-infrastructure-en-5-web-accessible.pdf> [Accessed 09 January 2026]

**Table 3-1: Relevant NPS Policy for Climate Change**

Relevant NPS Paragraph	Requirement of the NPS	Location of information provided to address this
<b>Overarching NPS for Energy EN-1</b>		
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 to maximise the use of nature-based solutions alongside other conventional techniques.	Section 7.8 of <b>ES Chapter 7: Climate Change</b> (Doc Ref. 6.1) and <b>ES Appendix 7-2: Climate Change Risk Register</b> (Doc Ref. 6.3) contain a climate change risk assessment, considering the impact of changing climate conditions on the Scheme. It also identifies the mitigation relevant to each climate change risk. Mitigation relevant to climate change risks have been embedded into the proposals of the Scheme, and impacts from the Scheme as a whole, including the embedded mitigation, have been assessed throughout the ES chapters.  A Flood Risk Assessment is provided within <b>ES Appendix 11-3: Flood Risk Assessment</b> (Doc Ref. 6.3).
4.10.6	Integrated approaches, such as looking across the water cycle, considering coordinated management of water storage, supply, demand, wastewater, and flood risk can provide further benefits to address multiple infrastructure needs, as well as carbon sequestration benefits.	This is noted but not considered relevant to the Scheme

Relevant NPS Paragraph	Requirement of the NPS	Location of information provided to address this
4.10.7	In addition to avoiding further GHG emissions when compared with more traditional adaptation approaches, nature-based solutions can also result in biodiversity benefits and net gain, as well as increasing absorption of carbon dioxide from the atmosphere.	<p>As discussed in Section 7.4 of <b>ES Chapter 7: Climate Change</b> (Doc Ref. 6.1), an assessment of GHG impacts from land use change associated with the conversion of arable land to grassland has been omitted to present a worst-case assessment. Though land use change due to the Scheme is anticipated to have an overall net positive GHG impact, due to the higher carbon sequestration value of grassland in comparison to cropland, it is expected that the land will return to its original use upon decommissioning of the Scheme, with any carbon stored in soil or vegetation re-released to the atmosphere. The beneficial GHG impact from land use change is therefore considered to only be temporary (approximately 40 years) and has therefore been excluded from the lifecycle GHG impact assessment.</p> <p>Details with regards to biodiversity net gain are presented within the <b>Biodiversity Net Gain Report</b> (Doc Ref. 7.9) submitted with the DCO Application.</p>
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	Section 7.8 of <b>ES Chapter 7: Climate Change</b> (Doc Ref. 6.1) and <b>ES Appendix 7-2: Climate Change Risk Register</b> (Doc Ref. 6.3) contain a

Relevant NPS Paragraph	Requirement of the NPS	Location of information provided to address this
	<p>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.</p>	<p>climate change risk assessment, considering the impact of changing climate conditions on the Scheme. It also identifies the mitigation relevant to each climate change risk.</p>
4.10.9	<p>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.</p>	<p>Section 7.8 of <b>ES Chapter 7: Climate Change</b> (Doc Ref. 6.1) and <b>ES Appendix 7-2: Climate Change Risk Register</b> (Doc Ref. 6.3) contain a climate change risk assessment, considering the impact of changing climate conditions on the Scheme. It also identifies the mitigation relevant to each climate change risk. A Flood Risk Assessment is provided within <b>ES Appendix 11-3: Flood Risk Assessment</b> (Doc Ref. 6.3).</p>
4.10.10	<p>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.</p>	<p>The climate change risk assessment presented in Section 7.8 of <b>ES Chapter 7: Climate Change</b> (Doc Ref. 6.1) considers the worst-case-scenario for climate change (RCP8.5) up to 2079.</p>
4.10.11	<p>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</p>	<p>Section 7.7 of <b>ES Chapter 7: Climate Change</b> (Doc Ref. 6.1) presents a summary of built in climate resilience measures, including those with regards to flood risk. Further information is also</p>

Relevant NPS Paragraph	Requirement of the NPS	Location of information provided to address this
	<p>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.</p>	<p>presented within <b>ES Appendix 11-3: Flood Risk Assessment</b> (Doc Ref. 6.3).</p>
<p>4.10.12</p>	<p>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.</p>	<p>Section 7.7 of <b>ES Chapter 7: Climate Change</b> (Doc Ref. 6.1) presents a summary of built in climate resilience measures, including those with regards to flood risk. Safety critical elements of the Scheme (such as On-Site Substation and BESS Compounds, Solar Stations and Cable Sealing End Compounds) have been designed to be resilient to flooding. Further information is also presented within <b>ES Appendix 11-3: Flood Risk Assessment</b> (Doc Ref. 6.3).</p>
<p>4.10.13</p>	<p>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</p>	<p>Section 7.4 of <b>ES Chapter 7: Climate Change</b> (Doc Ref. 6.1) details the information and datasets used to undertake the climate risk assessment. Section 7.8 of <b>ES Chapter 7: Climate Change</b> (Doc Ref. 6.1) and <b>ES Appendix 7-2: Climate Change Risk Register</b> contain a climate change risk assessment, considering the impact of changing climate conditions on the Scheme up to 2079, which covers the expected decommissioning period. Further information is</p>

Relevant NPS Paragraph	Requirement of the NPS	Location of information provided to address this
	the estimated lifetime of the new infrastructure, including any decommissioning period.	also presented within <b>ES Appendix 11-3: Flood Risk Assessment</b> (Doc Ref. 6.3).
4.10.15	The Secretary of State should be satisfied that there are not features of the design of new energy infrastructure critical to its operation which may be seriously affected by more radical changes to the climate beyond that projected in the latest set of UK climate projections, taking account of the latest credible scientific evidence on, for example, sea level rise (for example by referring to additional maximum credible scenarios – i.e. from the Intergovernmental Panel on Climate Change or EA) and that necessary action can be taken to ensure the operation of the infrastructure over its estimated lifetime.	Section 7.8 of <b>ES Chapter 7: Climate Change</b> (Doc Ref. 6.1) and <b>ES Appendix 7-2: Climate Change Risk Register</b> contain a climate change risk assessment, considering the impact of changing climate conditions on the Scheme. Safety critical elements of the Scheme (such as On-Site Substation and BESS Compounds, Solar Stations and Cable Sealing End Compounds) have been designed to be resilient to flooding. Further information is also presented within <b>ES Appendix 11-3: Flood Risk Assessment</b> (Doc Ref. 6.3).
4.10.16	If any adaptation measures give rise to consequential impacts (for example on flooding, water resources or coastal 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.	Section 7.8 of <b>ES Chapter 7: Climate Change</b> (Doc Ref. 6.1) and <b>ES Appendix 7-2: Climate Change Risk Register</b> (Doc Ref. 6.3) contain a climate change risk assessment, considering the impact of changing climate conditions on the Scheme. It also identifies the mitigation relevant to each climate change risk. Mitigation relevant to climate change risks have been embedded into the proposals of the Scheme, and impacts from the Scheme as a whole, including the embedded mitigation, have been assessed

Relevant NPS Paragraph	Requirement of the NPS	Location of information provided to address this
		throughout the ES chapters. A Flood Risk Assessment is provided within <b>ES Appendix 11-3</b> (Doc Ref. 6.3).
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.	As set out in Section 7.4 of <b>ES Chapter 7: Climate Change</b> (Doc Ref. 6.1), the future baseline assessment has been based on the UK Climate Projections 2018 (UKCP18) <sup>15</sup> data for the Site. Further information on flood risk is presented within <b>ES Appendix 11-3: Flood Risk Assessment</b> (Doc Ref. 6.3).
5.3.4	All proposals for energy infrastructure projects should include a GHG assessment as part of their ES (See Section 4.3). This should include: <ul style="list-style-type: none"> <li>• A whole life GHG assessment showing construction, operational and decommissioning GHG impacts, including impacts from change of use of land.</li> <li>• An explanation of the steps that have been taken to drive down the climate change impacts at each of those stages.</li> </ul>	Section 7.8 of <b>ES Chapter 7: Climate Change</b> (Doc Ref. 6.1) presents a whole-life carbon assessment, including an assessment of residual emissions against UK carbon budgets and sectoral targets. As discussed above and in Section 7.4 of <b>ES Chapter 7: Climate Change</b> (Doc Ref. 6.1), an assessment of GHG impacts from land use change associated with the conversion of arable

<sup>15</sup> UKCP18 (2018). Met Office Climate Projections. Available at: <https://www.metoffice.gov.uk/research/approach/collaboration/ukcp> [Accessed 07/10/2025]

Relevant NPS Paragraph	Requirement of the NPS	Location of information provided to address this
	<ul style="list-style-type: none"> <li>• Measurement of embodied GHG impact from the construction stage.</li> <li>• How reduction in energy demand and consumption during operation has been prioritised in comparison with other measures.</li> <li>• How operational emissions have been reduced as much as possible through the application of best available techniques for that type of technology.</li> <li>• Calculation of operational energy consumption and associated carbon emissions.</li> <li>• Whether and how any residual GHG emissions will be (voluntarily) offset or removed using a recognised framework.</li> <li>• 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.</li> </ul>	<p>land to grassland has been omitted to present a worst-case assessment.</p> <p>Measures embedded within the Scheme to reduce GHG impacts are summarised within Section 7.7 of <b>ES Chapter 7: Climate Change</b> (Doc Ref. 6.1).</p>
5.3.5	<p>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</p>	<p>Measures embedded within the Scheme to reduce GHG impacts are summarised within Section 7.7 of <b>ES Chapter 7: Climate Change</b> (Doc Ref. 6.1).</p>

Relevant NPS Paragraph	Requirement of the NPS	Location of information provided to address this
	remains secure, reliable and affordable, as we transition to net zero.	
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.	Measures embedded within the Scheme to reduce GHG impacts are summarised within Section 7.7 of <b>ES Chapter 7: Climate Change</b> (Doc Ref. 6.1).
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.	Measures embedded within the Scheme to reduce GHG impacts are summarised within Section 7.7 of <b>ES Chapter 7: Climate Change</b> (Doc Ref. 6.1).
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 development.	Section 7.8 of <b>ES Chapter 7: Climate Change</b> (Doc Ref. 6.1) presents a whole-life carbon assessment for all stages of the Scheme.
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.	Measures embedded within the Scheme to reduce GHG impacts are summarised within Section 7.7 of <b>ES Chapter 7: Climate Change</b> (Doc Ref. 6.1).
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	Measures embedded within the Scheme to reduce GHG impacts are summarised within

Relevant NPS Paragraph	Requirement of the NPS	Location of information provided to address this
	<p>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.</p>	<p>Section 7.7 of <b>ES Chapter 7: Climate Change</b> (Doc Ref. 6.1).</p>
<p>5.3.11</p>	<p>Operational GHG emissions are a significant adverse impact from some types of energy infrastructure which cannot be totally avoided (even with full deployment of CCS technology). Given the characteristics of these and other technologies, as noted in Part 3 of this NPS, and the range of non-planning policies that can be used to decarbonise electricity generation, such as the UK ETS (see Section 2.4), government has determined that operational GHG emissions are not reasons to prohibit the consenting of energy projects or to impose more restrictions on them in the planning policy framework than are set out in the energy NPSs (e.g. the CCR requirements). Any carbon assessment will include an assessment of operational GHG emissions, but the policies set out in Part 2, including the UK ETS, can be applied to these emissions.</p>	<p>Section 7.8 of <b>ES Chapter 7: Climate Change</b> (Doc Ref. 6.1) presents a whole-life carbon assessment for all stages of the Scheme. Measures embedded within the Scheme to reduce GHG impacts are summarised within Section 7.7 of <b>ES Chapter 7: Climate Change</b> (Doc Ref. 6.1).</p>

Relevant NPS Paragraph	Requirement of the NPS	Location of information provided to address this
<b>NPS for Renewable Energy EN-3</b>		
2.4.11	<p>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:</p> <ul style="list-style-type: none"> <li>• Increased risk of flooding; and</li> <li>• Impact of higher temperature.</li> </ul>	<p>Section 7.8 of <b>ES Chapter 7: Climate Change</b> (Doc Ref. 6.1) and <b>ES Appendix 7-2: Climate Change Risk Register</b> (Doc Ref. 6.3) contain a climate change risk assessment, considering the impact of changing climate conditions on the Scheme, including the increased risk of flooding and higher temperature. Further information is also provided within <b>ES Appendix 11-3: Flood Risk Assessment</b> (Doc Ref. 6.3).</p>
2.10.9	<p>Along with associated infrastructure, a solar farm currently requires between 1.6 and 2.25 hectares (4-5.6 acres) for each MW of output. However, this will vary significantly depending on the site, with some being larger and some being smaller. This is also expected to change over time as the technology continues to evolve to become more efficient. Nevertheless, this scale of development will inevitably have impacts, particularly if sited in rural areas.</p>	<p>This is acknowledged within <b>ES Chapter 7: Climate Change</b> (Doc Ref. 6.1).</p>
<b>NPS for Electricity Networks Infrastructure EN-5</b>		
2.3.2	<p>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</p>	<p>Section 7.8 of <b>ES Chapter 7: Climate Change</b> (Doc Ref. 6.1) and <b>ES Appendix 7-2: Climate Change Risk Register</b> (Doc Ref. 6.3) contain a</p>

Relevant NPS Paragraph	Requirement of the NPS	Location of information provided to address this
	<p>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:</p> <ul style="list-style-type: none"> <li>• Flooding, particularly for substations that are vital to the network; and especially in light of changes to groundwater levels resulting from climate change;</li> <li>• The effects of wind and storms on overhead lines;</li> <li>• Higher than average temperatures leading to increased transmission losses;</li> <li>• Earth movement or subsidence caused by flooding or drought (for underground cables); and</li> <li>• Coastal erosion - for the landfall of offshore transmission cables and their associated substations in the inshore coastal locations respectively.</li> </ul>	<p>climate change risk assessment, considering the impact of changing climate conditions on the Scheme. Further information is also provided within <b>ES Appendix 11-3: Flood Risk Assessment</b> (Doc Ref. 6.3).</p>
2.3.3	<p>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 section 5.6 in EN-1).</p>	<p>Section 7.8 of <b>ES Chapter 7: Climate Change</b> (Doc Ref. 6.1) and <b>ES Appendix 7-2: Climate Change Risk Register</b> (Doc Ref. 6.3) contain a climate change risk assessment, considering the impact of changing climate conditions on the Scheme. Further information is also provided within <b>ES Appendix 11-3: Flood Risk Assessment</b> (Doc Ref. 6.3).</p>

## 4. National Planning Policy Framework

- 4.1.1. The National Planning Policy Framework (NPPF)<sup>16</sup> outlines the Government’s planning policies for England and provides guidance on their implementation. Paragraph 5 outlines that while the NPPF 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.
- 4.1.2. 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 4-1.

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<sup>16</sup> *National Planning Policy Framework (2025)*. Available at: <https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf> [Accessed 10 October 2025]

**Table 4-1: Relevant NPPF Requirements for Climate Change**

Relevant NPPF Paragraph	Requirement of the NPPF	Location of information provided to address this
161	<p>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.</p>	<p>Section 7.8 of <b>ES Chapter 7: Climate Change</b> (Doc Ref. 6.1) summarises the Scheme’s impact on the net-zero trajectory and the climate change risk assessment.</p>
164	<p>New development should be planned for in ways that:</p> <ul style="list-style-type: none"> <li>(a) 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</li> <li>(b) 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.</li> </ul>	<p>Section 7.8 of <b>ES Chapter 7: Climate Change</b> (Doc Ref. 6.1) assesses the Scheme’s vulnerability to climate change and provides a greenhouse gas assessment, considering the Scheme’s impact on national carbon budgets and existing policy.</p>

## 5. Other National Policies and Guidance

### 5.1. UK Climate Change Risk Assessment (2022)

- 5.1.1. The UK Climate Change Risk (CCR)<sup>17</sup> Assessment provides an assessment of current and future climate risks to the UK, detailing priorities for action. Development proposals should evaluate potential risks identified in the CCRA relevant to the project location and design and incorporate climate adaptation measures essential for climate resilience.

### 5.2. Net Zero Strategy: Build Back Greener (2020)

- 5.2.1. The Net Zero Strategy<sup>18</sup> sets out policies and proposals for decarbonising all sectors of the UK economy, providing a roadmap for achieving the UK's net-zero 2050 target. One of the key policies is for the UK to be entirely powered by clean energy sources (predominantly solar and wind) by 2035.

### 5.3. Energy White Paper: Powering our Net Zero future (2020)

- 5.3.1. The Energy White Paper: Powering Our Net Zero Future<sup>19</sup> emphasises the role of renewable energy, setting the foundation for an affordable and resilient energy system by transitioning to low-carbon energy.

### 5.4. National Infrastructure Strategy (2020)

- 5.4.1. In addition, the National Infrastructure Strategy<sup>20</sup> emphasises the need for sustainable infrastructure that helps meet the UK's climate goals, supporting economic recovery, decarbonization, and resilience.

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<sup>17</sup> DEFRA (2022) *UK Climate Change Risk Assessment*. Available at: <https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2022>. [Accessed 10 October 2025]

<sup>18</sup> Department for Business, Energy and Industrial Strategy (BEIS) (2021). *Net Zero Strategy: Build Back Greener*. Available at: <https://www.gov.uk/government/publications/net-zero-strategy> [Accessed 10 October 2025]

<sup>19</sup> DESNZ (2020) *Energy white paper: Powering our Net Zero future*. Available at: <https://www.gov.uk/government/publications/energy-white-paper-powering-our-net-zero-future> [Accessed 10 October 2025]

<sup>20</sup> *National Infrastructure Strategy (2020)*. Available at: <https://www.gov.uk/government/publications/national-infrastructure-strategy> [Accessed 10 October 2025]

## 5.5. Powering Up Britain: Net Zero Growth Plan (2023)

- 5.5.1. Powering Up Britain: Net Zero Growth Plan<sup>21</sup> specifically addresses the climate agenda by focusing on accelerating net-zero transition through renewable energy investments, energy security, and carbon reduction in line with legally binding targets.

## 5.6. The Seventh Carbon Budget

- 5.6.1. In February 2025, the Climate Change Committee published The Seventh Carbon Budget<sup>22</sup>, statutory report which provides advice to the UK Government on the level of the Seventh Carbon Budget (2038 to 2042).

## 5.7. Climate Change Planning Practice Guidance

- 5.7.1. The Climate Change Planning Practice Guidance<sup>23</sup> describes how to identify suitable mitigation and climate adaptation measures to incorporate into the planning process.

## 5.8. World Business Council for Sustainable Development and World Resources Institute GHG Protocol guidelines

- 5.8.1. The World Business Council for Sustainable Development and World Resources Institute GHG Protocol<sup>24</sup> provides globally recognized standards for corporate GHG accounting and reporting.

## 5.9. Institute of Sustainability and Environmental Professionals Guidance

- 5.9.1. The Institute of Sustainability and Environmental Professionals (ISEP) (formerly Institute of Environmental Management and Assessment (IEMA))

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<sup>21</sup> DESNZ (2023) *Powering Up Britain: Net Zero Growth Plan*. Available at: <https://www.gov.uk/government/publications/powering-up-britain/powering-up-britain-net-zero-growth-plan> [Accessed 10 October 2025]

<sup>22</sup> Climate Change Committee (2025). *The Seventh Carbon Budget*. Available at: <https://www.theccc.org.uk/publication/the-seventh-carbon-budget/> [Accessed 10 October 2025]

<sup>23</sup> Ministry of Housing, Communities and Local Government (2018). *Planning Practice Guidance for Climate Change (2019 update)*. Available at: <https://www.gov.uk/guidance/climate-change>. [Accessed 10 October 2025]

<sup>24</sup> World Business Council for Sustainable Development and World Resources Institute GHG Protocol guidelines. *Corporate Standard*. Available at: [Corporate Standard | GHG Protocol](https://www.wbcsd.org/standards/ghg-protocol). [Accessed 10 October 2025]

Environmental Impact Assessment Guide to: Assessing Greenhouse Gas Emissions and Evaluating their Significance<sup>25</sup> provides the latest guidance on evaluating and mitigating GHG emissions within EIA. ISEP's Environmental Impact Assessment Guide to: Climate Change Resilience and Adaptation<sup>26</sup> provides a framework for the consideration of Climate Change resilience and adaptation in EIA and includes case studies of emerging good practice.

## 5.10. Publicly Available Specification (PAS) 2080 (2023) Carbon Management in Buildings and Infrastructure

5.10.1. PAS 2080:2023<sup>27</sup> is a global standard for managing infrastructure carbon. It emphasises reducing both carbon emissions and costs through intelligent design, construction, and operational practices. The entire value chain of a project is considered to optimise carbon reductions and economic efficiency.

## 6. Local Policy and Guidance

6.1.1. Local policy and guidance relevant to the climate change assessment comprise:

- South East Lincolnshire Local Plan (SELLP) 2011-2036<sup>28</sup>;
- Lincolnshire County Council Green Masterplan 2021<sup>29</sup>; and
- Lincolnshire County Council Carbon Management Plan 2019<sup>30</sup>.

6.1.2. The relevant considerations are summarised within Table 6-1.

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<sup>25</sup> IEMA (2022). *Environmental Impact Assessment Guide to: Assessing Greenhouse Gas Emissions and Evaluating their Significance - Second Edition*

<sup>26</sup> IEMA (2020). *Environmental Impact Assessment Guide to: Climate Change Resilience and Adaptation*.

<sup>27</sup> BSI (2023). *Guidance Document for PAS 2080*.

<sup>28</sup> Lincolnshire County Council (2019) *South East Lincolnshire Local Plan 2011-2036*. Available at: <https://southeastlincslocalplan.org/media/21941/South-East-Lincolnshire-Local-Plan-2011-2036/pdf/Local-Plan-text-March-2019.pdf?m=1720710748483>. [Accessed 10 October 2025]

<sup>29</sup> Lincolnshire County Council (2021) *Green Masterplan*. Available at: <https://www.greaterlincolnshirelep.co.uk/documents/dan-clayton-lincolnshire-county-council-green-master-plan-09062021>. [Accessed 10 October 2025]

<sup>30</sup> Lincolnshire County Council (2019) *Carbon Management Plan*. Available at: <https://lincolnshire.moderngov.co.uk/documents/s62396/Appendix+A+Carbon+Management+Plan+4+Final+version+1.1.pdf>. [Accessed 10 October 2025]

**Table 6-1: Relevant Local Policy and Guidance with respect to Climate Change**

Relevant Document	Relevant Policies	Location of information provided to address this
<p>South East Lincolnshire Local Plan (SELLP) 2011-2036</p>	<p>Policy 4: Approach to flood risk                      Policy 31: Climate Change and Renewable and Low Energy Carbon.                      These policies identify the need to consider and, where appropriate, mitigate GHG emissions associated with new development. They specify that new development should aim for reduced or zero-carbon development by incorporating renewable or low-carbon energy sources and maximising energy efficiency where practicable and should be built in resilience to projected climate change impacts.</p>	<p>Section 7.8 of <b>ES Chapter 7: Climate Change</b> (Doc Ref. 6.1) summarises the Scheme’s impact on the net-zero trajectory and the climate change risk assessment. Section 7.7 summarises measures embedded within the Scheme to minimise GHG emissions and for climate resilience. Further information is also provided within <b>ES Appendix 11-3: Flood Risk Assessment</b> (Doc Ref. 6.3).</p>
<p>Lincolnshire County Council Green Masterplan 2021</p>	<p>Lincolnshire County Council’s Green Masterplan sets out the guiding principles of how the County will achieve ‘net zero carbon’ by 2050, in response to climate change. The three guiding principles are “don’t waste anything, what are the wider implications? 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. The Green Masterplan is</p>	<p>Section 7.8 of <b>ES Chapter 7: Climate Change</b> (Doc Ref. 6.1) summarises the Scheme’s impact on the net-zero trajectory. Section 7.7 summarises measures embedded within the Scheme to minimise GHG emissions.</p>

Relevant Document	Relevant Policies	Location of information provided to address this
	supported by the Initial Action Plan 2020-2025 <sup>31</sup> ; which led to the development of initial projects to support in achieving national carbon reduction targets.	
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 work with local partners to unlock area-wide investment and to incorporate local energy generation opportunities.	Section 7.8 of <b>ES Chapter 7: Climate Change</b> (Doc Ref. 6.1) summarises the Scheme’s impact on the net-zero trajectory.

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<sup>31</sup> Lincolnshire County Council (2020) *Initial Action Plan 2020-2025*. Available at: <https://www.lincolnshire.gov.uk/green-masterplan/initial-plan-2020-2025/1>. [Accessed 10 October 2025]

