

Light Valley Solar

Planning Statement Appendix 2 – Grey Belt Assessment

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**Light Valley
Solar**

Infrastructure Planning

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

Light Valley Solar

DCO Submission

Planning Statement Appendix 2 – Grey Belt Assessment

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1 Introduction

1.1 Overview and purpose of the document

- 1.1.1 This Appendix provides further information regarding how the Green Belt land in which the Proposed Development is located should be considered as ~~Grey Belt~~grey belt land, why the Proposed Development satisfies the policy tests for being ‘not inappropriate’ in the ~~grey belt~~Green Belt by virtue of being located on grey belt land, with reference to NPS EN-1 and the new National Planning Policy Framework (NPPF) (August 2026) (Ref 1) and summarised in Section 7.5-of the Planning Statement [EN0110012/APP/LVS/05.02].
- 1.1.2 This is followed, in case ~~it~~ any of the above is not agreed, by a summary of the very special circumstances that outweigh any harm that may be considered to arise to the Green Belt as a result of the Proposed Development, in accordance with ~~paragraph 153~~ Policy GB6: control of development in the Green Belt, paragraph 2 of the NPPF where “inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances (VSC).” (to which NPS EN-1 defers).
- 1.1.3 The Proposed Development is Critical National Priority (CNP) Infrastructure, as set out in Section 7.2.1 to 7.2.11 ~~42.2~~ of the Planning Statement. Therefore, as stated in NPS EN-1 (Ref 2) paragraph 4.2.30, the Secretary of State will take as the starting point for decision-making that CNP infrastructure is to be treated as meeting the very special circumstances test.
- ~~4.1.3~~1.1.4 Similarly, the NPPF (August 2026) Policy GB6, paragraph 3 states that “in the case of proposals for renewable and low carbon energy development, very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.”
- ~~4.1.4~~1.1.5 If for any reason the Secretary of State disagrees with the position that the Proposed Development is CNP Infrastructure, very special circumstances are considered to outweigh any harm to the Green Belt in any case. As such, a high level summary of the very special circumstances justifying development within the Green Belt is also provided for completeness.

1.2 Proposed Development within the Green Belt

- 1.2.1 SDS 2, 3 and 4, and Cable Route Corridors (CRCs) 2-6, 3-4, 3-4a and 4-POC, are wholly or partly located within the West Yorkshire Green Belt, as detailed in Table 73 within the Planning Statement [EN0110012/APP/LVS/05.02].
- 1.2.2 In summary, SDSs 2 and 4 are 54% (44.6 ha) and 49% (101.6 ha) within the Green Belt respectively. SDS 3, 19.9 ha, is wholly within the Green Belt. All of the abovementioned CRCs, including Construction Compound 5 on CRC 4-POC, are wholly within the Green Belt, with the exception of CRC 2-6, which is 49% within the Green Belt.

- 1.2.3 Plate 7-1 in the submitted Planning Statement [EN0110012/APP/LVS/05.02] shows the Green Belt designation in the context of the Order Limits, which illustrates that the Proposed Development has avoided the Green Belt designation as far as practicable.

1.3 Grey Belt Assessment

- 1.3.1 This section provides an assessment of why the Proposed Development is considered to be located on grey belt land.

Policy summary

- 1.3.2 NPS EN-1 paragraph 5.11.2 advises that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. NPS-EN1 defers to ~~chapter 13 of the NPPF~~ for further information on Green Belt purposes.

- 1.3.3 The updated NPPF (August 2026) maintains, as before, that Green Belt serves five purposes ~~to~~ (NPPF, paragraph 143 Policy GB2: paragraph 1. a-e.):

- i. ~~a) To~~ check the unrestricted sprawl of large built-up areas;
- b) ~~To~~ prevent neighbouring towns from merging into one another;
- c) ~~To~~ assist in safeguarding the countryside from encroachment;
- d) ~~To~~ preserve the setting and special character of historic towns;
- e) ~~To~~ assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

- 1.3.4 According to the NPPF Glossary (Annex B), grey belt is for the purposes of plan-making and decision-making, defined as “land within the Green Belt that comprising previously developed land and/or any other land that, in either case, does not strongly contribute to purposes (a), (b), or (d) in policy GB2:.”

~~i. — does not strongly contribute to Green Belt purposes (a), (b) or (d); and the application of policies in footnote 7 of the NPPF (other than Green Belt) do not provide a strong reason for refusing development.⁴~~

- 1.3.5 In line with NPPF GB7, paragraph 1(-g), ~~d~~Development on grey belt land may ~~is~~ not be inappropriate development where all of the following are demonstratedapply:

- i. ~~The site is grey belt~~the development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan.

⁴ ~~Policies in the NPPF relating to: habitats sites; Sites of Special Scientific Interest; Potential Special Protection Areas and Special Areas of Conservation; Listed or proposed Ramsar sites; Sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites; land designated as Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets; non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments; areas at risk of flooding or coastal change.~~

- ii. there is an evidenced unmet need for the type of development proposed;
 - iii. the development would be in a sustainable location, with particular reference to policy TR3 of the NPPF (August 2026); and
 - iv. in the case of major development involving the provision of housing, the development proposed complies with policy GB8 (the Golden Rules).
- i.

~~Development of the site would not fundamentally undermine the purposes of the remaining Green Belt.~~

~~There is demonstrable unmet need for the development proposed.~~

~~The site is in a sustainable location (with particular reference to paragraphs 110 and 115 of the NPPF regarding transport).~~

~~The site provides Golden Rules (not applicable in this case).²~~

1.3.6 In producing this AugustSeptember 2026 update, fFollowing publication of the new NPPF in Augst 2026, this assessment takes into account Annex E of the NPPF: Green Belt assessments.

~~1.3.6~~ 1.3.7 Please note, the following ~~analysis~~ assessment does not consider the CRC as this element of the Proposed Development will be underground, ~~and~~ therefore meets the definition of “engineering operations” listed in ~~paragraph 154(h)-policy GB7 paragraph 1(f)(i) of the NPPF (August 2026)~~, as development which is ‘not inappropriate’ in the Green Belt. To be ‘not inappropriate’, engineering operations must preserve openness and not conflict with Green Belt purposes. NPS EN-1 recognises that elements of energy infrastructure installations, such as underground pipelines, may be considered an “engineering operation” ~~and regarded as not inappropriate in the Green Belt at paragraph 5.11.22.~~

~~1.3.7~~ 1.3.8 Although the term “engineering operations” ~~is~~ not defined in statute, it has been described in the courts (reference Fayrewood Fish Farms v SoS and Hampshire CC (1984)) as “an operation which would generally be supervised by an engineer” ~~but does not actually have to be supervised by an engineer~~.

~~1.3.8~~ 1.3.9 Although there is no specific definition of ‘openness’, the planning practice guidance advises that matters that may be taken into consideration include spatial and visual aspects, the duration of development and its remediability, and the degree of activity likely to be generated.

~~1.3.9~~ 1.3.10 The CRCs 2-6, 3-4, 3-4a and 4-POC are reasonably considered engineering operations that will preserve the openness of the Green Belt because:

- i. Spatially, the development will be at and below ground level and therefore preserve openness.
- ii. Visually, the CRC will necessitate digging, which will disturb soils and require construction of access routes and construction compounds. However, this visual impact will be temporary and reversible as the access routes and compounds will be removed and remediated once the cables are in place.

² ~~The Golden Rules are only relevant to housing developments.~~

iii. Generation of activity will be limited to the construction phase only, with the exception of occasional maintenance visits during the operational phase.

~~4.3.10~~ **1.3.11** The CRC will not conflict with Green Belt purposes due to the temporary nature of the impacts, which are relevant only to Green Belt purpose (c) (encroachment into the countryside).

~~4.3.11~~ **1.3.12** The following analysis therefore focuses on SDSs 2, 3, ~~and 4~~ and Construction Compound 4 on CRC 4-POC only, hereafter 'the Green Belt Locations'.

Grey Belt Test 4: land in the Green Belt does not strongly contribute to purposes (a), (b) or (d)

Purpose (a) – to check the unrestricted sprawl of large built-up areas

~~4.3.12~~ **1.3.13** Annex E of the NPPF (August 2026) and ~~t~~ The planning practice guidance (Ref 3) ~~is~~ are clear that villages should not be considered large built-up areas (paragraph NPPF Annex E paragraph 3 and PPG paragraph 005 Reference ID: 64-005-20250225 of the ppg).

~~4.3.13~~ **1.3.14** According to the adopted settlement hierarchy in the adopted Local Plan for Selby, there is only one principal town in Selby district, which is Selby itself. There are two Local Service Centres, Sherburn and Tadcaster. All other settlements are defined as Designated Service Villages, Secondary Villages, or hamlets without development limits.

~~4.3.14~~ **1.3.15** None of the Green Belt Locations are adjacent to Selby, which would reasonably be considered the only 'large built-up area' in Selby district. The closest SDS, SDS 2, is located approximately 6.3 km from Selby. The Green Belt Locations are also not in proximity to Sherburn or Tadcaster (designated Local Service Centres). The closest SDS, Site 2, is located 3.9 km from Sherburn and 12.4 km from Tadcaster.³

~~4.3.15~~ **1.3.16** The Green Belt Locations are therefore considered to make no contribution to purpose (a).

Purpose (b) – to prevent neighbouring towns from merging into one another

~~4.3.16~~ **1.3.17** Annex E of the NPPF (August 2026) and ~~The~~ planning practice guidance (Ref 3) ~~is~~ are clear that this purpose relates to the merging of towns, not villages. Selby is the only principal town according to the settlement hierarchy (NPPF Annex E 4 and PPG paragraph 005 Reference ID: 64-005-20250225).

~~4.3.17~~ **1.3.18** SDS 2 is located between South Milford, Monk Fryston/Hillam (to the west) and Hambleton (to the east), which are Designated Service Villages. SDS 2 is

³ All measures in this section are approximate and use development limits from the adopted Local Plan and the closest SDS boundary to calculate minimum distances.

approximately 2.2 km from South Milford, 1.1 km from Monk Fryston/Hillam and 900 metres from Hambleton. SDS 3 is located 420 metres to the east of Hillam (Designated Service Village). The closest settlements to SDS 4 are Hillam (Service Village), 1.4 km away, and Birkin (Secondary Village), 45 metres away.

~~1.3.18~~ 1.3.19 As none of the Green Belt Locations are located in proximity to Selby (the only principal town), the Green Belt Locations are considered to make no contribution to purpose (b).

Purpose (d) - to preserve the setting and special character of historic towns

~~1.3.19~~ 1.3.20 The NPPF Annex E (August 2026) and planning practice guidance ~~is~~ are clear that this purpose relates to historic towns, not villages (NPPF Annex E paragraph 5 and PPG paragraph 10; 005 Reference ID: 64-005-20250225). The meaning of the term 'historic town' is not defined in the NPPF.

~~1.3.20~~ 1.3.21 In an advice note dated 2015 entitled Planning on the Doorstep: The Big Issues – Green Belt, the Planning Advisory Service (PAS) (Ref 4) considers that purpose (d) "is generally accepted as relating to very few settlements in practice. In most towns there already are more recent developments between the historic core, and the countryside between the edge of town".

~~1.3.21~~ 1.3.22 In light of PAS' guidance, the meaning of a historic town is generally understood to apply to historic towns of national significance, such as York or Oxford. ~~However, approaches to Green Belt assessments differ, with heritage assets of a much smaller scale, such as Conservation Areas, sometimes used to identify historic towns~~ This is further clarified by NPPF Annex E where the approach to assessing whether the contribution of the Green Belt to the setting and special character of historic towns is explicit to historic towns only and does not refer to conservation areas.

~~1.3.22~~ 1.3.23 ~~Nevertheless, for completeness, it has already been established that there are no towns in proximity to the Green Belt Locations. The~~ it is noted that the closest Conservation Areas to the Green Belt Locations are the Monk Fryston Conservation Area, located 1,140 metres to the west of Site 2, and the Hillam Conservation Area, located 530 metres to the west of Site 3.

~~1.3.23~~ 1.3.24 ~~Reference to the settlement hierarchy is relevant to the meaning of 'historic town'. Notably, Both~~ Monk Fryston and Hillam are defined as villages, rather than towns. ~~Furthermore, following PAS' guidance on the term 'historic towns' generally applying to those of national significance, t~~ The presence of a Conservation Area within these villages would not reasonably result in Monk Fryston or Hillam being defined as a historic towns.⁴ Therefore, the development locations are considered to make no contribution to purpose (d).

⁴ This conclusion is consistent with the Inspector's reasoning in Appeal Decision APP/U2750/W/25/3369368 (paragraph 10). This states, "the PPG is clear that purpose 143(d) relates to historic towns, not villages. As such, the appeal site cannot be considered to make a strong contribution to forming part of the setting of a historic town or make a considerable contribution to the special character of a historic town".

Grey Belt Test 2: the application of policies in footnote 7 of the NPPF (other than Green Belt) do not provide a strong reason for refusing development

- 1.3.24 According to the definition, 'grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.
- 1.3.25 The only policies listed that are relevant to the Proposed Development are those relating to areas at risk of flooding.
- 1.3.26 There are areas at risk of flooding from fluvial, surface water and groundwater flooding within all of the SDSs and within CRCs as detailed in Section 6.4 of the Planning Statement [EN0110012/APP/LVS/05.02]. However, flood risk does not provide a strong reason for refusing or restricting the Proposed Development because the development has passed the sequential test, and the exception test where relevant, and therefore meets the requirements of paragraphs 173 to 179 of the NPPF. The assessment of flood risk is provided in Section 7.4 of the Planning Statement [EN0110012/APP/LVS/05.02].

Grey belt – summary

- 1.3.27 1.3.25 The parts of the site within the Green Belt are is considered to be located on grey belt land as it which does not make any contribution to purposes (a), (b) or (d) of the Green Belt. This is primarily because it the land is not located in close proximity to any towns. Furthermore, policies relating to flood risk in the NPPF do not provide a strong reason for refusing or restricting development, because the relevant sequential and exception tests have been satisfied.

1.4 Development not inappropriate in the Grey Belt

- 1.4.1 Section 1.3 demonstrates that the Proposed Development is located on grey belt land.
- 1.4.2 In addition to being located within the grey belt, to be 'not inappropriate' development in the Green Belt, the Proposed Development must also satisfy all of the following criteria in the following further tests set out in paragraph 155 of the Policy GB7, paragraph 1(-g) of the NPPF (August 2026) where all of the following apply:
- i. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;:
 - ii. There is an evidenced unmet need for the type of development proposed;
 - iii. The development would be in a sustainable location, with particular reference to policy TR3 of the NPPF; and
 - i-iv. In the case of major development involving the provision of housing, the development proposed complies with policy GB9 (the Golden Rules).The

~~development would not undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;~~

~~There is a demonstrable unmet need for the development proposed;~~

~~The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of the NPPF.~~

~~1.4.3 The final test, regarding the Golden Rules, is not applicable to the Proposed Development.~~

~~1.4.4~~ 1.4.3 The tests set out in a(i) to (iii)e) above are addressed in turn, noting that (iv) is not applicable to the Proposed Development.

Test 1: Purposes of the remaining Green Belt

~~1.4.5~~ 1.4.4 This section considers the extent to which release or development of Green Belt land (including but not limited to grey belt land) would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as whole.

~~1.4.6~~ 1.4.5 In reaching this judgment, the planning practice guidance advises consideration of whether, or the extent to which, the release or development of Green Belt Land would affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way (Paragraph: 008 Reference ID: 64-008-20250225).

~~1.4.7~~ 1.4.6 There is no up to date Green Belt Assessment for Selby that identifies grey belt sites and potential development within these areas. This assessment considers the 'post development' scenario, and whether the pattern of development created by the Proposed Development would meaningfully undermine the remaining Green Belt across the plan area with regard to the five purposes.

Purpose (a) - to check the unrestricted sprawl of large built-up areas

~~1.4.8~~ 1.4.7 It has been established in paragraph 1.3.14 above that there are no built-up areas close to or adjacent to the Green Belt Locations. Therefore, the development will not undermine purpose (a). It follows that, in the post-development scenario, the remaining Green Belt would still function with respect to purpose (a).

Purpose (b) - to prevent neighbouring towns from merging into one another

~~1.4.9~~ 1.4.8 It has been established in paragraph 1.3.18 above that there are no defined towns close to or adjacent to the Green Belt Locations. Therefore, the development will not undermine purpose (b). It follows that, in the post-development scenario, the remaining Green Belt would still function with respect to purpose (b).

Purpose (c) - to assist in safeguarding the countryside from encroachment

~~1.4.10~~1.4.9 In the construction phase and post development scenario, there would be some encroachment into the countryside as a result of the Proposed Development. However, this impact is not considered to fundamentally undermine the rest of the Green Belt with respect to purpose (c) for the reasons set out below.

~~1.4.11~~1.4.10 The Proposed Development is not wholly within the Green Belt, as set out in the Planning Statement [EN0110012/APP/LVS/05.02] and Section 1.2 above. Although SDS 3 and temporary Construction Compound 5 on CRC 4-POC ~~is are~~ wholly within the Green Belt, this the construction compound is less than 1.86 ha and temporary ~~and whilst SDS 3~~ is the smallest of the SDSs located within the Green Belt, at 19.9 ha. SDSs 2 and 4, have 54% (44.6 ha) and 49% (101.6 ha) of the site area located within the Green Belt. For SDS 4, the Green Belt designation runs along the site's western boundary and southern section only. As shown in Plate 7-1 in the Planning Statement [EN0110012/APP/LVS/05.02] the Proposed Development has avoided the Green Belt designation as far as practicable.

~~1.4.12~~1.4.11 The solar panel installation and the temporary construction compound, ~~will~~ not be 'urbanising' in the way that an urban extension or new town would be. ~~It~~ The Proposed Development will be visually broken-up and traffic generation will be negligible. The proposed planting, including restoration of hedgerows, will reinforce the countryside character. The ~~installation~~ Proposed Development is ~~also~~ designed to work within the landscape, retaining the existing field patterns. The ~~SDSs sites~~ are relatively dispersed rather than concentrated, such that there are significant areas of open countryside retained between them (more than 1 km between SDS 2 to SDS 3 and SDS 4), helping to preserve the openness of the Green Belt.

~~1.4.13~~1.4.12 The installation will be temporary (up to three years for the temporary construction compound and up to 60 years for the SDSs) and reversible, meaning that once removed, the vast majority of soils beneath will retain their existing quality and will be capable of being returned to agricultural use. Agricultural activity such as grazing will still be possible throughout the operational phase on the SDSs, and biodiversity will be significantly enhanced.

~~1.4.14~~1.4.13 It is acknowledged that there will be some encroachment into the countryside as a result of the Proposed Development, which will occur cumulatively with the development of Hillam Solar Farm, and therefore there will be impact to purpose (c). However, this impact is not considered to 'fundamentally undermine' (NPPF Policy GB:7 paragraph 1.g.i) the remaining Green Belt for the reasons outlined above. It follows that, in the post-development scenario, the remaining Green Belt would continue to function with respect to purpose (c).

Purpose (d) - to preserve the setting and special character of historic towns

~~1.4.15~~1.4.14 It has been established in paragraph 1.3.23 above that there are no historic towns close to or adjacent to the Green Belt Locations. Therefore, the development will not undermine purpose (d). It follows that, in the post-development scenario, the remaining Green Belt would still function with respect to purpose (d).

Purpose (e) - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

~~1.4.16~~1.4.15 In an advice note dated 2015, the Planning Advisory Service (PAS) considers that for purpose (e):

It must be the case that the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. If Green Belt achieves this purpose, then all Green Belt does so to the same extent and hence the value of various land parcels is unlikely to be distinguished by the application of this purpose.

~~1.4.17~~1.4.16 Based on this guidance, purpose (e) is considered to apply generally to Green Belt designation as a policy tool to encourage development of brownfield land. In this case, in the post development scenario, the Proposed Development would continue to be located within the Green Belt ~~designation~~ and development would still be encouraged by local planning policy to be developed on Brownfield land. The Proposed Development would not prevent brownfield developments from being prioritised. It follows that, in the post-development scenario, the remaining Green Belt would continue to function with respect to purpose (e).

~~1.4.18~~1.4.17 It should be noted that the Applicant has considered locating the Proposed Development on brownfield land, however, no suitable sites were identified as set out in the Site Selection Assessment Report [\[EN0110012/LVS/APP/06.03.03.01\]](#).

Summary

~~1.4.19~~1.4.18 In summary, the Proposed Development would not fundamentally undermine the remaining purposes of Green Belt, taken as a whole. Although there is acknowledged to be an impact on purpose (c) with respect to encroachment into the countryside, this is not sufficient to fundamentally undermine the continued operation of the remaining Green Belt due to the nature of the development, which is not urbanising in the same way as a new town or urban extension, is visually broken up and works within the existing field patterns, with negligible traffic generation.

Test 2: Demonstrable unmet need for the development proposed

~~1.4.20~~1.4.19 The demonstrable unmet need for the development is established in NPS EN-1, which states (at paragraphs 3.2.8 to 3.2.10):

The Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is a need for those types of infrastructure, which is urgent, as described for each of them in this Part.

In addition, the Secretary of State has determined that substantial weight should be given to this need when considering applications for development consent under the Planning Act 2008.

The Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS.

~~1.4.21~~1.4.20 The Proposed Development responds to this need, as set out in the Statement of Need [EN110012/APP/LVS/05.03].

~~1.4.22~~1.4.21 Given the clear need for renewable energy and the Proposed Development as set out in National Policy, there is a demonstrable unmet need for the development.

Test 3: Sustainable location

~~1.4.23~~1.4.22 The goal-objective of NPPF as set out in Chapter 13, Protecting Green Belt land, paragraph 110 is to is to prevent urban sprawl by keeping land permanently open. Policy GB:7 paragraph 1.g.iii requires that the development would be in a sustainable location, with particular reference to policy TR3 of the Framework. Policy TR3 is to locate development in sustainable locations to support sustainable patterns of movement, enable good accessibility for different users and make the most of existing and proposed transport infrastructure. The policy targets development proposals which could generate a significant amount of movement and seeks to ensure that significant adverse impacts on the transport network, or on highway safety, are mitigated to an acceptable degree using a vision-led approach. ~~manage patterns of growth and sure that significant development is focused in locations that are, or can be made, sustainable by limiting the need to travel and offering a genuine choice of transport modes. Paragraph 110 acknowledges that the opportunities to maximise sustainable transport solutions will vary between urban and rural areas. Paragraph 115 aims to prioritise sustainable transport modes.~~

~~1.4.24~~1.4.23 The location of the Proposed Development was chosen through first identifying a suitable grid connection for a utility scale project (which are limited). This was identified at Monk Fryston through discussions with National Grid. Following this, locations for all elements of the Proposed Development were identified based on topography and irradiance levels, taking account of other

constraints including flood risk, environmental designations, Green Belt, cultural heritage and agricultural land classification.

~~1.4.25~~ 1.4.24 The Site Selection Assessment Report (SSAR) (ES Volume 3) [EN0110012/APP/LVS/06.03.03.01] provides an assessment of alternative sites. This report confirms that there are no more suitable and available alternative locations for the Proposed Development within a search area of 25 km radius of Monk Fryston Substation based on the criteria identified.

~~1.4.26~~ 1.4.25 The transport impact of ~~solar energy installations~~ the Proposed Development is very low. ~~For the Proposed Development, t~~ During operation, there are only five visits to each SDS expected to take place per month for maintenance reasons, equating to less than one trip per day on average. Typically, these trips will be made by light good vehicles (LGVs). Alongside regular maintenance, some infrastructure is expected to require replacement during the 60-year life cycle. The expected programme for replacements assumes that all panels will be replaced once over the design life of the Proposed Development, with further replacement (assumed 10%) to occur on an ad hoc basis. BESS cells are assumed to require replacement up to five times over the design life. The vehicle trips generated by replacements are expected to be lower than during the construction phase.

~~1.4.27~~ 1.4.26 Owing to the nature of the development, which carries a negligible transport impact during the operational phase, the site is considered to be in a sustainable location in terms of transport.

Grey Belt – conclusion

~~1.4.28~~ 1.4.27 In summary, the Proposed Development is located on grey belt land because land within the Green Belt Locations does not strongly contribute to Green Belt purposes (a), (b) or (d) as outlined under Test 1. ~~Further, the application of policies in footnote 7, including flood risk, do not provide a strong reason for refusing development for the reasons outlined under Test 2.~~

~~1.4.29~~ 1.4.28 Applying the additional tests in NPPF ~~paragraph 155~~ GB7: paragraph 1.g, the Proposed Development is not inappropriate in the grey belt because it will not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan, there is a demonstrable need for the development established in NPS EN-1, and the site is in a sustainable location with respect to transport.

1.5 Very Special Circumstances

1.5.1 Where NPS EN-1 notes at paragraph 5.11.20 that inappropriate development in the Green Belt should not be approved except in very special circumstances, the Applicant is satisfied that the Proposed Development is demonstrably located on 'grey belt' ~~land, and~~ land and is not inappropriate development under current policy. Therefore, the Green Belt policy test of very special circumstances (~~paragraph 153 of the NPPF and paragraphs 5.11.36 and 5.11.47 of the NPS- EN1 and GB6 paragraph 3 of the NPPF~~) does not need to be engaged.

- 1.5.2 However, should the Secretary of State disagree with the stated position on grey belt, the Applicant considers that the Proposed Development is critical national priority (CNP) infrastructure, as defined in paragraph 4.2.17 of NPS EN-1.

CNP Infrastructure

- 1.5.3 Section 12.2 of the Planning Statement [EN0110012/APP/LVS/05.02] sets out the reasons why the Proposed Development is CNP Infrastructure, including an explanation of how the mitigation hierarchy has been applied. As set out in paragraph 3.3.63 of NPS EN-1, the urgent need for CNP Infrastructure to achieving [national] energy objectives, together with the national security, economic, commercial and net zero benefits, means that it is likely the need case will outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy, in all but the most exceptional circumstances.
- 1.5.4 Further, as set out in paragraph 4.2.28 of NPS EN-1, where residual non-Habitats Regulations Assessment (HRA) or non-Marine Conservation Zone (MCZ) impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure. Therefore, in all but the most exceptional circumstances, it is unlikely that consent will be refused on the basis of these residual impacts.
- 1.5.5 It has been shown in Section 12.2 of the Planning Statement [EN0110012/APP/LVS/05.02] that the Proposed Development would not meet any of the exceptions set out in paragraph 4.2.28, and as such, it is CNP Infrastructure.
- 1.5.6 NPS EN-1 paragraph 4.2.30 states that the Secretary of State will take as the starting point for decision-making that, where a proposal is CNP Infrastructure, this is to be treated as meeting the very special circumstances test set out in paragraph 153 of the NPPF, which states that “inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances”.
- 1.5.7 Given the above, there is no reason why the starting point for the very special circumstances test can be said not to apply to the Proposed Development.

Very special circumstances

- 1.5.8 NPS EN-1 states at paragraph 5.11.36 that, when located in the Green Belt, energy infrastructure projects may comprise ‘inappropriate development’, which is by definition harmful to the Green Belt. The NPPF [\(August 2026\) policy GB6](#) makes clear that most new building is inappropriate in the Green Belt and should be refused permission unless in very special circumstances. [Policy GB 6 does state at paragraph 3 that “in the case of proposals for renewable and low carbon energy development, very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.”](#)

- 1.5.9 Paragraph 5.11.37 explains that very special circumstances are not defined in national planning policy as it is for the individual decision maker to assess each case on its merits and give relevant circumstances their due weight. Paragraph 5.11.37 goes on to state that very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources. [As noted above, this is reflected in the NPPF.](#)
- 1.5.10 Should the Secretary of State for any reason disagree with the conclusion that the Proposed Development is CNP Infrastructure and therefore that the very special circumstances test in [paragraph 153-Policy GB 6](#) of the NPPF should be met, very special circumstances exist for the Proposed Development in any case, that would outweigh harm to the Green Belt by reason of inappropriateness, and any other harm. The very special circumstances considered to be relevant to the Proposed Development are set out below.

The important contribution of large-scale solar development to achieving the UK's ambitious decarbonisation targets

- 1.5.11 Decarbonisation at pace is imperative to meet the UK's commitments to the Paris Agreement (2019) and the 2050 net zero GHG emissions target established through the Climate Change Act 2008 (2050 Target Amendment) Order 2019. According to the Sixth Carbon Budget, the UK is required to reduce GHG emissions by 78% by 2035 compared to 1990 levels (**Statement of Need (SoN)**, Section 3.3, p. 11) **[EN0110012/APP/LVS/05.03]**.
- 1.5.12 Large-scale solar is a proven technology capable of delivery at scale against the timeframes required to meet the net zero target (SoN, paragraph 1.1.15). However, the pipeline of proposals to develop large-scale solar generation nationally before 2030 is significantly below the scale required. Small-scale schemes in isolation will not meet the urgent need for solar, and incur a much higher cost compared to large-scale schemes on a per unit basis **[SoN, para 7.12.9]**.
- 1.5.13 As set out in the SoN, "The government's Clean Power framework has established a capacity range of 45-69GW for the prioritisation of large-scale solar scheme connections by 2035. To deliver this unprecedented increase in solar generation capacity, the equivalent of approximately one project the size of the Proposed Development would need to be switched on every month from January 2026 to December 2035" (**SoN**, para 3.11.10).
- 1.5.14 Furthermore, the much-needed decarbonisation of other sectors such as transport, buildings, agriculture and aviation is largely reliant on the availability of sufficient quantities of low carbon electricity to substitute for carbon-emitting fuels used within these sectors, therefore, the development of new low carbon electricity generation infrastructure must accelerate (**SoN**, para 3.3.11).
- 1.5.15 As stated in the Statement of Need, the Proposed Development will, if consented, make an important and significant contribution towards achieving the government's Clean Power target and legally binding net zero target by 2050 (**SoN**, paragraph 3.11.14).

Ability to deliver before 2030

- 1.5.16 Currently, one of the biggest risks to decarbonising the power system by 2035 is the delay in connecting transmission projects to the grid. The Proposed Development has secured grid connection at Monk Fryston in 2030. The Solar component of the Proposed Development has secured a Gate 2 Phase 1 prioritisation from the National Energy System Operator (NESO), meaning that it is capable of connection in 2030 or earlier.

Contribution to the security of energy supply

- 1.5.17 The Proposed Development would make an important contribution to securing the supply nationally, helping to mitigate risks from delays or under-delivery in other technologies such as offshore wind and nuclear.
- 1.5.18 The development of solar energy infrastructure domestically will increase national energy independence, reducing exposure to global gas price shocks and geopolitical tensions that affect energy prices (**SoN**, paras 3.8.6; 5.3.10-11; 6.2.16–6.2.17).
- 1.5.19 The co-located BESS will strengthen system resilience by storing excess low-carbon energy when abundant, releasing it during periods of high demand. It will also reduce network constraints and make better use of existing infrastructure, improving operability and reliability (**SoN**, paras 7.10.10–11; 7.11.1–7.11.9).

Contribution to Biodiversity Net Gain significantly above the minimum statutory requirement

- 1.5.20 The Proposed Development can achieve BNG significantly in excess of the statutory 10% requirement, being capable of delivering a total net percentage change of 78.30% for habitats, 72.12% for hedgerow and 10.42% for watercourses based on the proposed design.

Contribution to enhanced local connectivity through new permissive paths

- 1.5.21 The Proposed Development will create new permissive paths to improve local connectivity. The new routes provide an opportunity to create an enhanced and better-connected network of recreational routes within the local area, adding to the existing PRow network and providing increased opportunity for recreation in the areas surrounding the Proposed Development.

The wider environmental benefits associated with increased production of renewable energy.

- 1.5.22 The wider environmental benefits associated with increased production of renewable energy includes (not limited to) the Proposed Development's contribution to:

- i. Global decarbonisation committed through the Paris Agreement 2015, which seeks to hold global average temperatures to well below 2 degrees above pre-industrial levels;
- ii. the Government's legally binding Net Zero 2050 target;
- iii. The UK's strategic plan for decarbonisation, which seeks to largely decarbonise its power sector by adopting low carbon sources quickly in order to meet the twin challenge of energy security and climate change (SoN, para 3.4.1);
- iv. Recommendations from the Climate Change Committee's Progress Report to Parliament 2025, which set out priority actions to keep the UK on course to Net Zero, recommending a fourfold increase in solar installations (SoN, para 3.5.4);
- v. the Connections Action Plan (published jointly by DESNZ and Ofgem in 2023) which seeks to improve the efficiency of connections to the electricity network;
- vi. the Government's Clean Power 2030 Action Plan, which promotes swift delivery of clean power before, and beyond, 2030 to pave the way for decarbonising the wider economy by 2050 (SoN, para 3.8.1);
- vii. the Solar Roadmap 2025, which details government and industry actions to radically increase the deployment of solar in all its forms across the UK (SoN, para 3.9.1);
- viii. aims of the Energy Act 2023 to strengthen energy security and support the delivery of net zero and affordable energy bills for households in the long term (SoN, para 3.10.1); and
- ix. North Yorkshire Council's goal to be carbon neutral by 2034 and carbon negative by 2040.

1.6 Conclusion

- 1.6.1 The Proposed Development is demonstrably located on grey belt ~~land, and~~land and meets the tests for being not inappropriate within the grey belt.
- 1.6.2 Should the Secretary of State disagree with the position on grey belt, the Proposed Development is CNP Infrastructure, and as such, the starting point for decision making is that the test of very special circumstances in Green Belt policy is satisfied.
- 1.6.3 A summary of reasons why the Proposed Development would, in any case demonstrate very special circumstances concludes that the significant need for low carbon electricity generation infrastructure to meet the government's decarbonisation objectives, and wider environmental benefits of the proposal, including the significant increase in BNG and creation of new permissive paths locally, would outweigh any harm identified to the Green Belt.

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