



**WHITESTONE**  
solar farm

# WHITESTONE SOLAR FARM

## Volume 5: Reports and Statements

### 5.4 Planning Statement

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Revision 01

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**Planning Act 2008**  
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**PLANNING STATEMENT**

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## Glossary

Term	Meaning
<i>Agricultural Land Classification (ALC)</i>	A system of classification of agricultural resource value of soils in England devised by Natural England, from Grade 1 (best quality) to Grade 5 (poorest quality), and based on criteria including soil characteristics (depth, structure, texture, chemistry, stoniness) as well as climate and site aspects.
<i>Best and Most Versatile Land (BMV)</i>	Best and Most Versatile is agricultural land with an Agricultural land Classification of Grade 1, Grade 2 or Grade 3a (National Planning Policy Framework).
<i>Long Lane 400kV Substation</i>	The new 400 kilovolt National Grid substation proposed on land immediately east of Long Lane, Brinsworth, S60 4JJ.
<i>Cable Corridors</i>	Corridors within which the high voltage cables would be constructed.
<i>Compulsory Acquisition (CA)</i>	Compulsory acquisition refers to the legal power the applicant can seek to take ownership of land and rights over land to enable a project to be built and operated.
<i>Conversation Area</i>	Conservation Areas are defined by local authorities as areas with special historic and architectural interest that are given extra protection through planning controls and considerations.
<i>Development Consent Order (DCO)</i>	A statutory order made by the relevant Secretary of State pursuant to The Planning Act 2008 to authorise a Nationally Significant Infrastructure Project which provides consent for the project and means that a range of other consents, such as planning permission and listed building consent, will not be required. A DCO can also include rights of compulsory acquisition.
<i>Environmental Impact Assessment (EIA)</i>	A process, undertaken by the applicant, of identifying and assessing the significant effects likely to arise from a project.

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Term	Meaning
<i>Environment Statement (ES)</i>	The Environmental Statement which presents the environmental information relating to the Proposed Development. The ES has been prepared to present information for formal consultation in accordance with current EIA regulation.
<i>Examining Authority (ExA)</i>	An Examining Authority is appointed by the Planning Inspectorate on behalf of the Secretary of State to carry out the examination of the application. The Examining Authority is made up of either a single independent planning inspector or a panel of up to five inspectors who are employed by the Planning Inspectorate. The Planning Inspectorate makes the appointment after considering the nature, scale and complexity of the case.
<i>Heritage Asset</i>	A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).
<i>Historic Environment Records (HERs)</i>	HERs are information services maintained and managed by local authorities. They contain details on local archaeological sites and finds, historic buildings and historic landscapes and are regularly updated. This information is usually held in a database with a digital mapping system (Geographic Information System).
<i>Listed Building</i>	<p>Designated assets being buildings or structures of special architectural and historic interest protected by legislation.</p> <p>There are three grades of listing, which are;</p> <ul style="list-style-type: none"> <li>• grade I (these are of exceptional interest);</li> <li>• grade II* (these are particularly important); and</li> <li>• grade II (these are of special interest).</li> </ul>
<i>National Grid Brinsworth Substation</i>	The existing 275 kilovolt substation at Brinsworth, located on Howarth Lane, Brinsworth, S60 5LW
<i>Nationally Significant Infrastructure Project (NSIP)</i>	<p>Nationally significant infrastructure projects are large scale major development projects in England or Wales which require permission under the Planning Act 2008. They can be projects such as:</p> <ul style="list-style-type: none"> <li>• power generating stations, offshore wind farms, electricity lines</li> <li>• new roads, railway lines, airports</li> <li>• hazardous waste facilities</li> </ul>

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Term	Meaning
	<ul style="list-style-type: none"> <li>waste-water treatment plants</li> <li>reservoirs</li> </ul> <p>Projects are only defined as nationally significant if they meet the relevant threshold set out in the Planning Act 2008.</p>
<i>Non-designated Heritage Asset</i>	A building, monument, site, place, area, or landscape identified by a local authority as having heritage significance that merits consideration in planning decisions, but which is not formally listed at a national level.
<i>Non-statutory Consultation</i>	The first round of consultation held from 18 November 2024 to 31 January 2025.
<i>Photomontage</i>	Where the Proposed Development model is superimposed onto existing baseline photography in accordance with TGN 06/19.
<i>Point of Connection (PoC)</i>	The new National Grid substation at Brinsworth (Long Lane 400kV Substation) where the Proposed Development would connect to the National Grid.
<i>Order Limits</i>	Total area comprising the Site and Cable Corridors.
<i>Registered Park and Garden (RPG)</i>	<p>A park and/or garden of special historic interest placed on a non-statutory Register. There are three grades of registration:</p> <ul style="list-style-type: none"> <li>Grade I – these are of exceptional interest;</li> <li>Grade II* - these are particularly important; and</li> <li>Grade II – these are of special interest.</li> </ul>
<i>Scheduled Monument</i>	A nationally important archaeological site and designated asset covered within the Ancient Monuments and Archaeological Act, 1979.
<i>Scoping Opinion</i>	The opinion in response from the relevant consenting authority to an EIA Scoping Report adopted by the Secretary of State on 3 June 2025 which sets out the aspects to be assessed within an EIA. Informed by consultation with the relevant statutory bodies.
<i>Study Area</i>	The spatial extent within which environmental receptors may experience likely significant effects from the Proposed Development.
<i>The Applicant</i>	Whitestone Net Zero Ltd
<i>The Application</i>	The Application submitted to the Secretary of State for a Development Consent Order.
<i>The Proposed Development</i>	The proposed Whitestone Solar Farm.
<i>The Site</i>	The land planned to be used for solar PV array and associated infrastructure, BESS, substations, and landscaping and habitat enhancement, but excluding Cable Corridors. The Site is split into W1, W2, and W3.

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Term	Meaning
<i>Whitestone 1 (W1)</i>	The northern parcels of the Whitestone Solar Farm.
<i>Whitestone 2 (W2)</i>	The middle parcels of the Whitestone Solar Farm.
<i>Whitestone 3 (W3)</i>	The southern parcels of the Whitestone Solar Farm.
<i>Zone of Theoretical Visibility (ZTV)</i>	Digital viewshed analysis which illustrates the theoretical visibility of the Proposed Development within the Study Area.

## Acronyms

Acronym	Meaning
<i>AC</i>	Alternating current
<i>AILs</i>	Abnormal Indivisible Loads
<i>ALC</i>	Agricultural Land Classification
<i>AoCM</i>	Adequacy of Consultation Milestone
<i>AOD</i>	Above Ordnance Datum
<i>AONB</i>	Are of Outstanding Natural Beauty
<i>AQMA</i>	Air Quality Management Area
<i>BESS</i>	Battery Energy Storage System
<i>BCA</i>	Bilateral Connection Agreement
<i>BMV</i>	Best and Most Versatile
<i>BNG</i>	Biodiversity Net Gain
<i>CB6</i>	Sixth carbon budget
<i>CCA 2008</i>	The Climate Change Act 2008
<i>CDC</i>	City of Doncaster Council
<i>CEA</i>	Cumulative Effects Assessment
<i>CNP</i>	Critical National Priority
<i>COMAH</i>	Control of Major Accident Hazards
<i>DCC</i>	Derbyshire County Council
<i>DCO</i>	Development Consent Order
<i>DC</i>	Direct current
<i>DESNZ</i>	Department for Energy Security and Net Zero
<i>EA</i>	Environment Agency
<i>EIA</i>	Environmental Impact Assessment
<i>EMF</i>	Electromagnetic field
<i>ES</i>	Environment Statement
<i>ExA</i>	Examining Authority
<i>HER</i>	Historic Environment Records
<i>ISEP</i>	Institute of Sustainability and Environmental Professionals

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Acronym	Meaning
<i>LIR</i>	Local Impact Report
<i>LNR</i>	Local Nature Reserve
<i>LVIA</i>	Landscape and Visual Impact Assessments
<i>LWS</i>	Local Wildlife Site
<i>MW</i>	Megawatts
<i>NCSC</i>	National Cyber Security Centre
<i>NEDDC</i>	North East Derbyshire District Council
<i>NETS</i>	National Electricity Transmission System
<i>NIC</i>	National Infrastructure Commission
<i>NPPF</i>	National Planning Policy Framework
<i>NPS</i>	National Policy Statements
<i>NPSA</i>	National Protective Security Authority
<i>NSIP</i>	Nationally Significant Infrastructure Project
<i>PA 2008</i>	Planning Act 2008
<i>PIA 2025</i>	Planning and Infrastructure Act 2025
<i>PRoW</i>	Public Rights of Way
<i>PV</i>	solar photovoltaic
<i>SAC</i>	Special Area of Conservation
<i>SOCC</i>	Statement of Commonality
<i>SoCG</i>	Statement of Common Ground
<i>SoS</i>	Secretary of State
<i>SPA</i>	Special Protection Area
<i>RMBC</i>	Rotherham Metropolitan Borough Council

# 1 INTRODUCTION

## 1.1 Background

- 1.1.1 This Planning Statement has been prepared on behalf of Whitestone Net Zero Ltd (the 'Applicant') in relation to an application for a Development Consent Order ('DCO') (the 'DCO Application') to be made to the Secretary of State ('SoS') for the Department for Energy Security and Net Zero, pursuant to the Planning Act 2008<sup>1</sup> ('PA 2008').
- 1.1.2 The DCO Application is for a Nationally Significant Infrastructure Project ('NSIP') comprising the construction, operation and maintenance, and decommissioning of a solar photovoltaic (PV) array electricity generating facility. The project includes solar PV panels, Battery Energy Storage System (BESS), onsite substations and associated grid connection infrastructure (hereafter 'the Proposed Development') which will allow for the generation and export of electricity to the new National Grid substation at Brinsworth ('Long Lane 400kV Substation'). The **Location Plans [EN0110020/APP/2.1]** show the Order Limits for the Proposed Development, which is approximately 1,488 hectares (ha) of land within the administrative areas of the City of Doncaster Council (CDC), Rotherham Metropolitan Borough Council (RMBC) North East Derbyshire District Council (NEDDC) and Derbyshire County Council (DCC).
- 1.1.3 The Proposed Development includes infrastructure capable of generating more than 100 megawatts (MW) of renewable energy connecting to the Long Lane 400kV Substation located east of Long Lane, Rotherham.

## 1.2 The Applicant

- 1.2.1 The Proposed Development is being promoted by Whitestone Net Zero Ltd which is a wholly-owned subsidiary of (Net Zero One Ltd). Net Zero One Ltd is a specialist renewable energy development business founded in 2021 to establish a funding pipeline to build, operate and decommission the Proposed Development and other similar projects.
- 1.2.2 The Applicant is part of the Green Nation family of companies established in 2011, Green Nation is a UK-based solar developer and manager of operational sites with extensive experience in both rooftop and ground-mounted solar projects. Green Nation currently manages 75 solar farms and more than 700 rooftop installations across the country. Its solar farm portfolio totals over 200MW of electricity producing capacity for the UK.

## 1.3 Legislative Context Review

- 1.3.1 The Proposed Development will be determined against the relevant National Policy Statements ('NPS'), alongside other national and local planning policies that may be important and relevant matters for the SoS's decision. Section 6 of this Planning Statement sets out the legislative context in further detail, including the relationship between the PA 2008, relevant NPSs and the Proposed Development.

- 1.3.2 The Proposed Development is classed as an NSIP as defined under sections 14(1)(a), 15(1) and 15(2) of the PA 2008 because its generating capacity exceeds 100MW. As such, it must be consented by a DCO. Section 103 of the PA 2008 sets out that the SoS is responsible for determining whether to grant a DCO for the Proposed Development and has the power to appoint an Examining Authority ('ExA') of an appointed person(s) to manage and examine the DCO application on behalf of the SoS.
- 1.3.3 The ExA, will make procedural decisions, examine the DCO Application and make a recommendation to the SoS who will then decide whether to grant development consent or not.
- 1.3.4 Section 104 of the PA 2008 prescribes that DCO applications must be determined in accordance with any relevant NPS where the NPS has effect in relation to development of the description to which the DCO Application relates, subject to a number of specific exceptions.
- 1.3.5 The SoS published a suite of NPSs in November 2025 related to energy infrastructure, which came into force in January 2026. The Applicant considers that the following NPSs (hereafter referred to as 'the NPSs' or individually as EN-1, EN-3 or EN-5) have effect in relation to the Proposed Development and therefore establish the primary policy basis for the SoS's determination of the DCO Application:
- Overarching National Policy Statement for Energy 2025 (EN-1) (NPS EN-1)<sup>2</sup>;
  - National Policy Statement for Renewable Energy 2025 (EN-3) (NPS EN-3)<sup>3</sup>; and
  - National Policy Statement for Electricity Networks Infrastructure 2025 (EN-5) (NPS EN-5)<sup>4</sup>.

## 1.5 Pre-Application Consultation

- 1.5.1 The PA 2008 requires applicants for DCOs to consult on their proposals prior to submission. Related regulations, guidance and advice provide further requirements for this pre-application consultation.
- 1.5.2 The Applicant notes that the Planning and Infrastructure Act 2025<sup>5</sup> (PIA 2025) has amended the PA 2008 to remove certain statutory pre-application consultation duties. However, the relevant provisions of the PIA 2025 are not yet in force and the Regulations and accompanying guidance are expected to be published later in 2026. Due to the timings of this project, therefore, the Applicant has undertaken statutory consultation in accordance with sections 42-47 of the PA 2008.
- 1.5.3 The Applicant held two consultations on the Proposed Development as a whole. The first, non-statutory consultation was held from 18 November 2024 to 31 January 2025, on the early plans and first masterplan for the Proposed Development. The second consultation was carried out from 16 September to 28 October 2025 in compliance with Sections 42, 47 and 48 of the PA 2008. This statutory consultation included the draft Environmental Statement (produced in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the ‘EIA Regulations’), third masterplan and other updated proposals for the Proposed Development.
- 1.5.4 In addition to the two consultations outlined above, the Applicant conducted ongoing engagement with City of Doncaster Council (‘CDC’), Rotherham Metropolitan Borough Council (‘RMBC’), North East Derbyshire District Council (‘NEDDC’) and Derbyshire District Council (‘DCC’) (the ‘Host Authorities’), statutorily prescribed consultees, relevant statutory undertakers, persons with an interest in the land, elected officials and local communities. This ongoing engagement with the Host Authorities has comprised regular meetings where updates have been provided on the Proposed Development, and feedback sought, including on design development. Technical meetings have also been held with the Host Authorities’ technical specialists.
- 1.5.5 The Applicant drafted a Statement of Community Consultation (SoCC) pursuant to s47 of the PA 2008, to describe the approach to community consultation during the statutory consultation. The Applicant consulted with Host Authorities on the SoCC from July – August 2025. On 04 February 2026, the Applicant met with the Host Authorities to discuss the Adequacy of Consultation Milestone (AoCM). The AoCM describes the consultation activities to date, how they complied with the SoCC and other requirements, and how the Applicant had responded to consultation feedback. On 05 February 2026, the Applicant submitted the AoCM Report to the Host Authorities and asked for a response by 25 February. The AoCM Report and responses were submitted to the Planning Inspectorate on 09 March 2026. All responses confirmed that the Applicant had met the legal requirements for consultation.
- 1.5.6 The Applicant also undertook further, targeted consultation between 04 March 2026 and 03 April 2026 on 37 proposed changes to the Order Limits, including:
- Road Safety – additional land was included in multiple locations along local roads to comply with highway safety standards where construction vehicles would access the Proposed Development.
  - Cable Routes – In several locations, the Applicant proposed to alter the cable routes that would connect the solar areas together and into the National Grid.

- Drainage Works – To the west of the proposed main substation, the Applicant proposed to enter a neighbouring piece of land to connect into an existing drainage point.
- Landscaping – New land was proposed for landscaping in order to reduce potential glint and glare impacts on local roads.

1.5.7 In addition, the Applicant held a final targeted consultation from 16 April to 18 May 2026 for any land interests that had been identified since the statutory consultation period.

1.5.8 A more detailed description of the consultations and ongoing engagement undertaken by the Applicant during the pre-application period, including a description of how feedback from consultees has informed the Proposed Development, is documented within the **Consultation Report [EN0110020/APP/5.1]**.

## 1.6 Supporting Documents

1.6.1 The Proposed Development is ‘EIA Development’ as defined by the EIA Regulations (2017)<sup>6</sup>, which means that Environmental Impact Assessment (EIA) is required. Therefore, an Environmental Statement (ES) has been prepared and submitted with the DCO Application.

1.6.2 A summary of the description of the Proposed Development can be found in the **ES Volume 1, Chapter 5: The Proposed Development [EN0110020/APP/6.5]**. The terminology used in this Planning Statement is defined in the glossary at the beginning of this document.

1.6.3 The reports and plans accompanying the DCO Application are set out in the **Guide to the Application [EN0110020/APP/1.2]**.

1.6.4 The Application is also supported by a Site Selection Report, which can be found in Appendix 1 of this Planning Statement, and a Green Belt Assessment which can be found at Appendix 2. These assessments set out the process for identifying the Order Limits for the Proposed Development, with reference to the siting considerations set out in NPSs EN-1, EN-3 and EN-5 and an assessment against national policy on Green Belt and grey belt, respectively.

## 1.7 Purpose and Structure of the Document

1.7.1 The purpose of this Planning Statement is to provide an overview of the Proposed Development and its impacts, and to demonstrate that the Proposed Development meets the legal test of its benefits outweighing its adverse impacts.

1.7.2 The remainder of the Planning Statement is structured as follows:

- Section 2 describes the Order Limits, including its surrounding areas, and summarises the process of selecting the Order Limits and relevant planning history within the Order Limits.
- Section 3 provides an overview of the Proposed Development and its component parts.
- Section 4 describes the need for the Proposed Development, highlighting the urgent need for renewable energy and the benefits of the Proposed Development.

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- Section 5 describes the Design Approach that has informed the design development of the Proposed Development.
- Section 6 provides an overview of the decision-making framework, legislation, policy context, and other important and relevant considerations.
- Section 7 sets out the Applicant's key engagement to date and how it has helped inform the Proposed Development.
- Section 8 provides an assessment of the Proposed Development and demonstrates the Proposed Development's compliance with all relevant policy requirements, as outlined within the NPSs and other relevant planning policy documents the Applicant considers may be both important and relevant.
- Section 9 presents the conclusions of the Planning Statement and the overall planning balance.

## 2 SITE CONTEXT

### 2.1 Introduction

2.1.1 This section summarises the physical characteristics of the Order Limits and its surrounding context, including policy allocations and designations. The Order Limits represent the anticipated maximum area of land required to facilitate the construction, operation, maintenance and decommissioning of the Proposed Development. As detailed in **ES Volume 1, Chapter 5: The Proposed Development [EN0110020/APP/6.5]**, the Proposed Development consists of solar PV array, associated infrastructure, Battery Energy Storage System (BESS), substations, and landscaping and habitat enhancements. The Proposed Development is split across four main areas within the administrative areas of the City of Doncaster Council (CDC), Rotherham Metropolitan Borough Council (RMBC), North East Derbyshire District Council (NEDDC) and Derbyshire District Council (DCC). The Order Limits comprise a total area of approximately 1,488 hectares (ha), consisting of approximately 339ha proposed for Cable Corridors, and 1,149ha proposed for the Site. The Order Limits extend approximately 18.5 km in a north-south direction, and approximately 8 km in an east-west direction. The Order Limits can be seen on the **Location Plans [EN0110020/APP/2.1]**.

### 2.2 Location, Characteristics, Designations and Allocations

2.2.1 The location of the Order Limits is shown on the submitted **Location Plans [EN0110020/APP/2.1]** and described in **ES Volume 1, Chapter 3: The Site and Surrounding Area [EN0110020/APP/6.3]**. In summary, the Proposed Development is situated to the east of Sheffield and Rotherham and consists of various parcels of land which fall either side of the M1 and M18 stretching between Conisbrough to the north and Killamarsh to the south.

2.2.2 As the Proposed Development is set across four administrative boundaries, including CDC, RMBC, NEDDC and DCC, for the purpose of Environmental Impact Assessment (EIA) and the application documents generally, the Site has been split into three distinct areas. These areas are referred to as:

- Whitestone 1 (W1);
- Whitestone 2 (W2); and
- Whitestone 3 (W3).

2.2.3 The below sections set out the environmental context for W1, W2 and W3.

#### **Whitestone 1 (W1)**

2.2.4 Whitestone 1 (W1) is the name for the northern area of the Site as shown in **ES Volume 3, Figure 3.2: Site Referencing [EN0110020/APP/6.19]**, located within the administrative area of CDC. W1 covers approximately 327ha of predominantly agricultural land, centred around NGR SK 503962.

2.2.5 W1 abuts the A630 to the north and is approximately 400 m from the village of Clifton to the east and the M18 to the southeast. The southwest of W1 is parallel

with the Doncaster-Rotherham border, with Firsby Reservoir to the southwest and Hooton Roberts approximately 700 m to the west. It is a broad open landscape set within a bowl (approximately 70 m Above Ordnance Datum (AOD)) gently rising with small hills such as Beacon Hill to the east. The landscape comprises predominately larger irregular arable fields, with a mix of hedgerows and lines of trees forming boundaries, which are occasionally sparse or non-existent. There are several isolated properties situated on Firsby Lane and Arbour Lane, approximately 100 m to the west of W1, however most nearby residential properties are concentrated in Clifton, approximately 470 m to the east, and Conisbrough, which borders the site immediately north of the A630. W1 lies within the South and West Yorkshire Green Belt. The Green Belt designation is discussed in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN0110020/APP/6.4]** and **Appendix 2: Green Belt Assessment** which is included in this Planning Statement.

- 2.2.6 There are no statutory landscape or ecological designations within W1. However, the Local Nature Reserve (LNR) Firsby Reservoir is located immediately to the southwest of W1, and Thrybergh Country Park is located approximately 1.3 km to the west as shown in **ES Volume 3, Figure 7.3: Landscape Designations [EN0110020/APP/6.19]**.
- 2.2.7 Natural England's Provisional Agricultural Land Classification (ALC) mapping shows the area with a provisional ALC of mostly Grade 3, with approximately 5% of W1 classified as Grade 2. Due to the age of the data, further ALC surveys have been undertaken to confirm the grading of the land and to determine whether the Grade 3 land falls within the "Best and Most Versatile" (BMV) as defined in Annex 2 of the National Planning Policy Framework<sup>7</sup>. The results of these surveys are discussed in **ES Volume 2, Chapter 9: Ground Conditions and Land Quality [EN0110020/APP/6.9]**, and **ES Volume 3, Appendix 9.6: Agricultural Land Classification Assessment [EN0110020/APP/6.20]**.
- 2.2.8 The Environment Agency's (EA) flood mapping and historic flooding records, shown in **ES Volume 3, Figures 10.4: Flood Zones and 10.6: Historic Flood Zone [EN0110020/APP/6.19]**, indicate that there are no areas of Flood Zone 2 or 3 in W1. Flood Zone 2 areas have a medium probability of flooding (annual probability between 1% and 0.1%), whilst Flood Zone 3 areas have a high probability of flooding (annual probability >1%).
- 2.2.9 There are several Public Rights of Way (PRoW) that cross W1, including footpaths and bridleways. These are:
- Conisbrough Parks Bridleway 2 (crossing into W1 at Firsby Lane)
  - Conisbrough Parks Bridleway 4 (following the route of Park Lane through W1)
  - Conisbrough Parks Bridleway 14 (crossing W1 from the southwest, running east to Park Lane)
  - Conisbrough Parks Footpath 3 (crossing W1 from the southwest and running north to Park Lane)
  - Conisbrough Parks Footpath 5 (crossing W1 from the north and running south the Park Lane)
  - Conisbrough Parks Footpath 6 (crossing W1 in the northeast)
  - Conisbrough Parks Footpath 8 (crossing W1 from the north); and
  - Conisbrough Parks Footpath 14 (crossing W1 from the southeast and running west to Park Lane).

- 2.2.10 Historic Environment Records (HER) data indicate no scheduled heritage assets within the boundary of W1, however nearby features of note as shown in **ES Volume 3, Figure 8.11: Designated Assets within 5km of the Proposed Development [EN0110020/APP/6.19]** include:
- Three Grade II Listed Buildings within 500 m of W1, two on Arbour Lane, and one in Micklebring;
  - five conservation areas within 2 km of W1 – Clifton, Old Ravenfield, Old Edlington, Conisbrough, and Braithwell; and
  - two scheduled monuments within 2 km of W1; Conisbrough Parks Romano-British Villa immediately to the east and Conisbrough Castle to the north east.

### Whitestone 2 (W2)

- 2.2.11 Whitestone 2 (W2) is the name for the central area of solar panels as shown in **ES Volume 3, Figure 3.2: Site Referencing [EN0110020/APP/6.19]** and is located in the administrative area of RMBC. It comprises approximately 650ha of predominantly agricultural land. W2 is bisected by the M1 and centres around NGR SK 477874.
- 2.2.12 W2 is bordered by Wickersley to the north, Thurgroft and Dinnington to the east, North Anston to the south east, Aston and Aughton in the south west, and Treeton and Brinsworth in the west. The M1 and M18 run north to south through the centre of W2, and the junction between the M1 and the M18 is located to the north of the majority of W2, with the M1 then running west towards Brinsworth to the west of W2. There are six wind turbines associated with Penny Hill Wind Farm in W2, west of the M1, with tip heights of 132 m. This wind farm is not related to the Proposed Development, and appropriate buffers have been given to the turbines within the design of the Proposed Development. Further consideration of this development regarding cumulative impacts are discussed in the technical chapters of this ES. W2 lies entirely within the Rotherham Green Belt, as discussed in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN0110020/APP/6.4]** and **Appendix 2: Green Belt Assessment** which is included in this Planning Statement.
- 2.2.13 There are no statutory landscape or ecological designations within W2, however Brampton Common Local Wildlife Site (LWS) overlaps with the Site to the east of the M1 / M18. Key features of the LWS have been considered within the design process, to minimise any potential adverse impacts that could occur as a result of the Proposed Development, as shown within the **Design Approach Document [EN0110020/APP/5.7]**. There are also three designated sites within 2 km of the Site (see **Statutory and Non-Statutory Ecological Sites [EN0110020/APP/2.6]** and **ES Volume 3, Figure 7.3: Landscape Designations [EN0110020/APP/6.19]**):
- Anston Stones Wood LNR and SSSI, 60 m southeast of the Site;
  - Ulley Country Park and LWS, adjacent to the Site; and
  - Catcliffe Flash LNR, 1.1 km west of the Site.
- 2.2.14 Natural England's Provisional ALC mapping shows the area with a provisional ALC grading of mostly Grade 3, with approximately 5% of W2 classified as Grade 2. Further ALC surveys have been undertaken to confirm the grading of the land and to determine whether the Grade 3 land falls within the BMV. The results of these surveys are discussed in **ES Volume 2, Chapter 9: Ground Conditions**

and Land Quality [EN0110020/APP/6.9], and **ES Volume 3, Appendix 9.6: Agricultural Land Classification Report [EN0110020/APP/6.20]**.

- 2.2.15 The River Rother is located to the west of W2. Ulley Brook runs in three branches through the western part of W2, two branches run west into Ulley Reservoir, and one runs from the reservoir north west where it joins with the River Rother. Kingsforth Brook runs west to east through W2, into a pond at the south of Slacks Lane. Anston Brook runs south east through the south east of W2, intersecting the Site near Straight Mile fishery, and running down to North Anston. EA flood mapping indicates a very small proportion of W2 is within Flood Zone 3, with slightly more in Flood Zone 2 (although this constitutes less than 5% of W2's total area) (see **ES Volume 3, Figure 10.4: EA Flood Zones [EN0110020/APP/6.19]**). Flood Zone 2 areas have a medium chance of flooding, at an annual probability of 0.1-1%.
- 2.2.16 W2 has a broad open landscape, with undulations in topography forming bowls and small shallow valleys where there are extensive views, however trees and hedgerows generally restrict views from roads and footpaths. There are various PRowS running across W2 as shown in **ES Volume 3, Figure 15.7: Public Rights of Way and Country Parks [EN0110020/APP/6.19]**, namely:
- Aston Footpaths 16 and 20 (cross into W2 from the south), and 17 (crosses into W2 from the southwest near Hardwick);
  - Bramley Footpath 6 (crosses into W2 at Slacks Lane) ;
  - Thurcroft Bridleway 9 (crosses into W2 from the east);
  - Thurcroft Footpaths 8 (crosses into W2 from the north) and 10 (crosses into W2 from the east);
  - Treeton Footpath 4 (crosses into W2 from the west);
  - Ulley Bridleway 6 (crosses into W2 at Stocket Lane);
  - Ulley Footpath 3, 4, and 5 (crosses into W2 from the west);
  - Whiston Bridleway 20 (following the route of Stow Bridge Lane through W2);
  - Whiston Footpath 19 (crosses into W2 from the northwest at Guilthwaite Common Lane); and
  - Wickersley Footpaths 8B (crosses into W2 from the north).
- 2.2.17 HER data indicates that there are no scheduled heritage assets within W2, however there are several nearby assets. These are shown in **Statutory and Non-statutory Historic Assets [EN0110020/APP/2.7]** as:
- 29 Grade II Listed Buildings within 500 m of W2, mostly associated with conservation areas;
  - ten conservation areas within 2 km of W2 – Whiston, Treeton, Ulley, Wickersley, Brampton-en-le-Morthen, Laughton-en-le-Morthen, Dinnington, Aston, North Anston, and South Anston; and
  - six Scheduled Monuments within 2 km of W2 – The glassworks cone at Catcliffe, Canklow Hill earthworks, Blue Man's Bower moated site, Hellaby, a deserted medieval village and well, Castle Hill motte and bailey castle, and Manor House moated site.

## Whitestone 3 (W3)

- 2.2.18 Whitestone 3 (W3) is the name for the southern area of solar panels, as shown in **ES Volume 3, Figure 3.2: Site Referencing [EN0110020/APP/6.19]** and is located within the administrative area of RMBC and NEDDC. The parcel of land within W3 which is to the west of the M1 and north of the A618 (Mansfield Road/Rotherham Road) crosses into the administrative area of NEDDC. W3 covers an area of approximately 172ha and is predominantly agricultural land, centred around NGR SK 481807.
- 2.2.19 W3 abuts Harthill Reservoir and Hard Lane to the east, the A618 and the Derbyshire County border to the south and west and is approximately 500 m south of Kiveton Park and the village of Wales. It is a broad open landscape with expansive views from elevated areas; the topography consists of small hills such as Stone Hill (144 m AOD) in the west of the Site. In the lower parts there are belts of trees which contain views from these areas. Residential receptors are generally concentrated in the villages of Woodall, Harthill, Kiveton Park, and Wales, as well as a cluster of properties to the south west, on the A618. W3 is also located in the Rotherham Green Belt as discussed in **ES Volume 2, Chapter 4: Alternatives and Design Evolution [EN0110020/APP/6.4]** and **Appendix 2: Green Belt Assessment** which is included in this Planning Statement.
- 2.2.20 There are no statutory landscape or ecological designations within W3. There are however, two designations within 2 km of the Site. These are Rother Valley County Park (1 km west of the Site), and Crabtree Wood SSSI (950 m southeast of the Site), shown in **Statutory and Non-statutory Ecological Assets [EN0110020/APP/2.6]**.
- 2.2.21 Natural England's ALC mapping shows the area has a provisional ALC of Grade 3. Due to the age of the data, further ALC surveys have been undertaken to confirm the grading of the land and to determine whether the Grade 3 land falls within the BMV. The interim results of these surveys are discussed in **ES Volume 2, Chapter 9: Ground Conditions and Land Quality [EN0110020/APP/6.9]**, and **ES Volume 3, Appendix 9.6: Agricultural Land Classification Report [EN0110020/APP/6.20]**.
- 2.2.22 Harthill Reservoir and its tributary border the southeast of W3. Broad Bridge Dike runs north from Harthill Reservoir and bisects W3. EA flood mapping shows less than 1% of W3 lies within Flood Zone 3. This Flood Zone is associated with Broad Bridge Dike, in the northeast of W3. In addition, there is a small area of Flood Zone 2 which surrounds the Kiveton Community Woodland, then the remainder of W3 is situated within Flood Zone 1. The flood zones and historic flooding are shown in **ES Volume 3, Figure 10.4: EA Flood Zones [EN0110020/APP/6.19]** and **ES Volume 3, Figure 10.7: Historic Flood Map [EN0110020/APP/6.19]** HER data indicates that there are no scheduled heritage assets within W3, however there are several assets near to the Order Limits. These assets comprise the following:
- Five Grade II Listed Buildings within 500 m, all in Harthill;
  - One Grade II\* Listed Building within 500 m in Woodall - 4 Walseker Lane;
  - One Grade I Listed Building within 500 m in Harthill - the Church of All Hallows;
  - Three conservation areas within 2 km - Wales, Harthill, and Barlborough;

- One Scheduled Monument within 2 km – Manor House moated site in Todwick; and
- One Registered Park and Garden within 2 km – Barlborough Hall.

2.2.23 The footpaths and bridleways that cross W3 are as follows:

- Harthill Bridleway 4 (following a local road off Rotherham Road (A618) and running north and then east into W3),
- Harthill Bridleway 16 (running east to west across the north of W3, connecting the north of Harthill with the north of Woodall
- Harthill Bridleway 29 (running north to south from the north of W3 towards Woodall);
- Harthill Footpaths 3, 5, and 30 (running along the southeast border of W3, adjacent to Harthill Reservoir);
- Harthill Footpath 15 (bordering the north of W3, between the Site and Kiveton Community Woodland); and
- Harthill Footpath 20 (running north to south between the northwest of W3 and the M1, before turning southeast into the Site and connecting with the north of Woodall).


### Cable Corridor

- 2.2.24 There are 18 Cable Corridors included within the Order Limits for the operation of the Proposed Development as described in **ES Volume 1, Chapter 5: The Proposed Development [EN0110020/APP/6.5]**. These have been refined where possible from the Cable Corridor Options shown in the Draft ES and at Statutory Consultation, as described in **ES Volume 1, Chapter 4, Alternatives and Design Evolution [EN0110020/APP/6.4]**.
- 2.2.25 The Cable Corridors are shown in **ES Volume 3, Figure 3.3: Detailed Site Referencing [EN0110020/APP/6.19]**. Where more than one option is presented with the same function, only one would be needed to be constructed to connect the Proposed Development to Long Lane 400kV Substation.
- 2.2.26 Further information on the environmental context of the Cable Corridors is set out within section 3.5 of the **ES Volume 1, Chapter 3: The Site and Surrounding [EN0110020/APP/6.3]**.


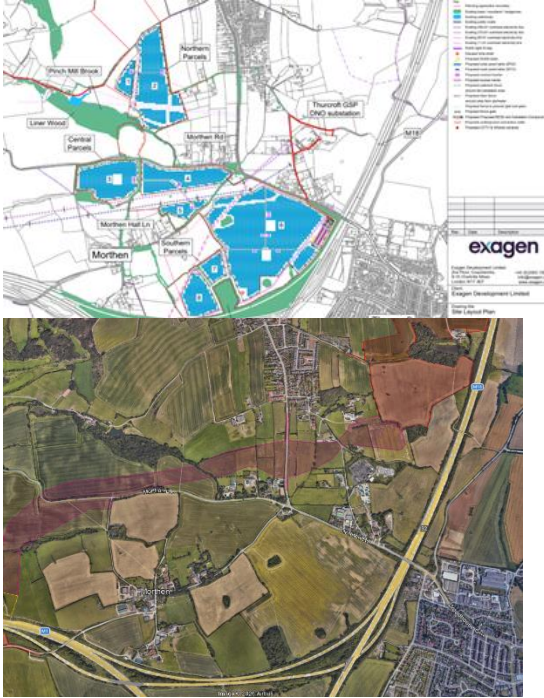
## 2.3 Relevant Planning History

- 2.3.1 The land contained within the Order Limits is predominantly in agricultural use and therefore the majority is undeveloped. As such, the relevant planning history of the land within the Order Limits is limited.
- 2.3.2 There are however a small number of applications for planning permission (largely for energy-related development) coming forward (or already approved) on adjacent land to the Order Limits which are proposing to utilise small areas within the Order Limits for access purposes. These areas are highlighted in **Table 1.1 Planning History** below.
- 2.3.3 None of the planning applications set out below relate to conflicting permanent development on the Order Limits land and any overlap is purely where there is a shared access, or where the Cable Corridor interacts with a site which either has permission, or a pending application, for development. In these cases, the Applicant would work with the developer to ensure a satisfactory solution so that any cable did not prevent them from implementing any planning permission granted and flexibility is included to allow for this appropriate micro-siting.



**Table 2.1: Planning History**

Reference	Project Description	Decision	Decision Date	Map
RB2024/0063  Appeal ref. APP/P4415/W/25/3363208	Erection of battery storage facility and associated works	Approved at Appeal	19 <sup>th</sup> November 2025	

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Reference	Project Description	Decision	Decision Date	Map
<p>RB2024/03 21</p> <p>Appeal ref. APP/P4415 /W/25 /3365059</p>	<p>Erection of battery storage facility and associated works</p>	<p>Approved at Appeal</p>	<p>19<sup>th</sup> November 2025</p>	
<p>RB2025/07 14</p>	<p>Construction, operation, and subsequent decommissioning of a renewable energy park, comprising ground mounted solar photovoltaic (PV) together with associated infrastructure including inverters, substation compound, cabling, access tracks, fencing, and landscaping</p>	<p>Pending</p>	<p>TBC</p>	

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Reference	Project Description	Decision	Decision Date	Map
RB2025/1674	Installation of 2 replacement terminal single poles (application made under Overhead Lines (Exemption) (England and Wales) Regulations 2009)	No objections Granted	13th January 2026	 <p>The map for RB2025/1674 consists of two parts. The top part is a technical line drawing of a road layout. It shows 'Pleasley Road' at the top right, a road labeled 'M1' at the bottom, and two red dots indicating the locations of 'Existing single poles to be replaced by new single terminal poles'. The bottom part is an aerial photograph of a green field with a road running through it, showing the real-world context of the poles.</p>
RB2025/0029	Proposed ground-mounted solar PV arrays, supporting energy infrastructure (including battery storage (BESS), access improvements and ancillary developments including, landscaping and biodiversity enhancements and continued shared	Pending	TBC	 <p>The map for RB2025/0029 also consists of two parts. The top part is a technical line drawing showing a network of roads and paths, with a large area outlined in red, likely representing the proposed solar PV array site. The bottom part is an aerial photograph of a rural landscape with brown and green fields, showing the real-world context of the proposed development.</p>

PLANNING STATEMENT

Reference	Project Description	Decision	Decision Date	Map
	agricultural use			
RB2025/0240	Proposed Battery Energy Storage Scheme (BESS)	Pending	TBC	
RB2025/1468	Erection of a new 400kV Gas Insulated Switchgear (GIS) substation including gantries, internal access roads, a GIS building, parking, drainage, emergency diesel generator, lighting and CCTV, permanent access road from Long	Pending	TBC	

## PLANNING STATEMENT

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Reference	Project Description	Decision	Decision Date	Map
	Lane, earthworks, landscaping and biodiversity enhancement , and fencing and the permanent realignment of Whiston Footpath 10			

## 3 PROPOSED DEVELOPMENT

### 3.1 Introduction

- 3.1.1 This section provides an overview description of the Proposed Development, including its components and proposed construction, operation and maintenance, and decommissioning activities. **ES Volume 1, Chapter 5: The Proposed Development [EN0110020/APP/6.5]** contains the full project description. **ES Volume 1, Chapter 3: Site and Surrounding Area [EN0110020/APP/6.3]** provides an overview of the Proposed Development's location.
- 3.1.2 The Proposed Development is described in Schedule 1 of the **Draft DCO [EN0110020/APP/3.1]**, where it is divided into works numbers which correspond to the **Works Plans [EN0110020/APP/2.3]**.

### 3.2 Components of the Proposed Development

- 3.2.1 The Proposed Development comprises the construction, operation and maintenance, and decommissioning of solar photovoltaic (PV) array with a generating capacity of in excess of 100 MW, Battery Energy Storage System (BESS), onsite substations and supporting infrastructure, and grid connection infrastructure Cable Corridors have also been identified for the location of underground cables to connect the Proposed Development to the new National Grid Long Lane 400kV Substation.
- 3.2.2 The Order Limits are shown on the **Location Plans [EN0110020/APP/2.1]**. The component parts of the Proposed Development are as follows
- Solar PV Infrastructure;
  - BESS;
  - Substations;
  - Cable Corridors;
  - Ancillary Works;
  - Temporary Construction Compounds;
  - Highway Works; and
  - Landscaping and biodiversity mitigation / enhancement.
- 3.2.3 The **Design Approach Document [EN0110020/APP/5.7]** provides further details of how the Proposed Development has fulfilled the requirement for good design. This includes the evolution and application of Design Principles, which have been used to inform the planning and design process to date and will continue to inform the design at later stages of the Proposed Development.

### 3.3 Flexibility and Development Capacity

- 3.3.1 The Applicant wishes to retain flexibility regarding the design detail of certain components of the Proposed Development, as supported by national policy (specifically, EN-1 Paragraph 4.3.18, Section 2.6 and Paragraphs 2.10.62-2.10.64

of EN-3). The extent of flexibility sought by the Applicant is described in **ES Volume 1, Chapter 5: The Proposed Development [EN0110020/APP/6.5]**.

- 3.3.2 Paragraph 4.3.11 of EN-1 recognises that in some instances, it may not be possible at the time of the application for development consent for all aspects of the proposal to have been settled in precise detail. Paragraph 4.3.12 continues that where some details are still to be finalised, the ES should assess, to the best of the Applicant's knowledge, what the likely worst-case environmental, social, and economic effects of the Proposed Development will be.
- 3.3.3 Paragraph 2.10.62 of EN-3 also states that not all aspects of the proposal for solar PV development may have been settled in precise detail at the point of application. Such aspects, including the type, number, and dimensions of panels, layout, and spacing, are among the aspects that are not settled down in a final design. EN-3 states further in paragraph 2.10.63 that applications may include a range of options based on different panel numbers, types and layouts, with and without storage.
- 3.3.4 It is important to note that the exact design details of the Proposed Development cannot be confirmed until development consent is granted and the construction tendering process for the design has been completed. Should development consent be granted, the Applicant will be required to submit for approval by the relevant planning authorities the detailed design in advance of any part of Works No. 1 to 9 commencing. Such requirements are secured as obligations within the DCO itself. Specifically, the detailed design must be in accordance with Requirement 3 in Schedule 2 to the **Draft DCO [EN0110020/APP/3.1]** and in accordance with the **Works Plans [EN0110020/APP/2.3]**.
- 3.3.5 The approach outlined above allows for flexibility to accommodate changes in technological advancements. For example, the enclosure or building sizes may vary depending on the contractor selected, their specific configuration, and plant selection. This is particularly important to maintain flexibility due to the rapid pace of change in solar PV and energy storage technologies, not least because technology that does not currently exist could be utilised. Therefore, sufficient flexibility has been sought for the final design within the DCO Application.
- 3.3.6 Establishing maximum parameters enables a robust assessment of likely significant effects to be undertaken within the ES for topics where the nature of the assessment requires a specific level of detail, such as maximum heights, massing, or noise levels. Thus, the assessment parameters form the basis of the assessment. The assessment parameters are detailed in the **Design Approach Document [EN0110020/APP/5.7]**. These are set out in full in the **Works Plans [EN0110020/APP/2.3]**. In addition, further information around the assessment parameters is set out in the **Outline Design Parameters [EN0110020/APP/7.3]** and **ES Volume 3, Appendix 2.3: Commitments Register [EN0110020/APP/6.20]**.
- 3.3.7 Solar panels generate electricity in direct current (DC) form. PV modules feed into inverters which convert electricity to alternating current (AC). Paragraph 2.10.42 of the EN-3 recognises that because the inverter is separate from the panels, the total capacity of a solar farm can be measured either in terms of the combined capacity of installed solar panels (measured in DC) or in terms of the combined capacity of installed inverters (measured in AC).
- 3.3.8 Paragraphs 2.10.44 - 2.10.50 set out recent policy developments in respect of determining capacity thresholds for the purposes of section 15 of the PA 2008. The revised EN-3 makes clear at paragraph 2.10.45 that the maximum combined

capacity of the installed inverters (measured in alternating current (AC)) should be used for the purposes of determining solar site capacity.

### 3.4 Associated Development

- 3.4.1 As set out in the **Explanatory Memorandum [EN0110020/APP/3.2]**, all aspects of the Proposed Development constituting associated development have been determined in accordance with the definitions set out in section 115 of the PA 2008.
- 3.4.2 In regard to the inclusion of BESS within the Proposed Development, the Applicant proposes to install BESS to aid the integration of high levels of renewable energy generation into the electricity market. This is in response to a developing need for renewable energy. As described in more detail in Section 4 of this Planning Statement, BESS provides a level of flexibility to the electricity network to manage demand.
- 3.4.3 Paragraph 3.3.25 of EN-1 recognises that storage has a key role to play in achieving net zero and providing flexibility to the energy system. Paragraph 3.3.26 further states that "*storage is needed to reduce the costs of the electricity system and increase reliability by storing surplus electricity in times of low demand to provide electricity when demand is higher*".
- 3.4.4 The BESS is considered to constitute Associated Development, in accordance with the 'Planning Act 2008: Guidance on associated development applications or major infrastructure projects'<sup>8</sup>. The guidance sets out four principles related to Associated Development, which include the following:
- i. The definition of associated development requires a direct relationship between associated development and the principal development. Associated development should therefore either support the construction or operation of the principal development or help address its impacts.
  - ii. Associated development should not be an aim in itself but should be subordinate to the principal development.
  - iii. Development should not be treated as associated development if it is only necessary as a source of additional revenue for the applicant, in order to cross-subsidise the cost of the principal development. This does not mean that the applicant cannot cross-subsidise, but if part of a proposal is only necessary as a means of cross-subsidising the principal development then that part should not be treated as associated development.
  - iv. Associated development should be proportionate to the nature and scale of the principal development. However, this core principle should not be read as excluding associated infrastructure development (such as a network connection) that is on a larger scale than is necessary to serve the principal development if that associated infrastructure provides capacity that is likely to be required for another proposed major infrastructure project. When deciding whether it is appropriate for infrastructure which is on a larger scale than is necessary to serve a project to be treated as associated development, each application will have to be assessed on its own merits. For example, the Secretary of State will have regard to all relevant matters including whether a future application is proposed to be made by the same or related developer as the current application, the degree of physical proximity of the proposed application to the current application, and the time period in which a future application is proposed to be submitted.

3.4.5 The proposed BESS will primarily support the solar development by storing generated electricity and exporting it to NETS at times of demand. It is intrinsically linked to the principal development (i.e. the solar PV array) in that it provides support to increase operational efficiency in a way that the principal development cannot achieve on its own. The BESS's primary function cannot exist without the principal development. The original Bilateral Connection Agreement (BCA) was issued by NESO in January 2022 for connection to the existing Brinsworth substation at 275kV. The agreement was accepted in April 2022. NESO then later revised the agreement in January 2025 to reflect the connection to the new Long Lane 400kV substation. At the same time, the connection date was moved to October 2029. The revised agreement was accepted by the Applicant in March 2025. As part of the Connections Reform process, the Proposed Development received confirmation from NESO that the solar component would receive a Gate 2 final customer offer for a phase 1 (up to and including 2030) connection. The BESS component is to receive a Gate 1 offer, the indicative connection date of which has not yet been confirmed. The revised offer is expected from NESO in the second half of 2026. However, the Applicant considers the BESS meets the four principles set out above and therefore constitutes Associated Development within the Proposed Development.

### 3.5 Lifetime of the Development

- 3.5.1 EN-3 discusses typical project lifetimes for solar photovoltaic generation projects in section 2.10. Paragraph 2.10.57 notes that an upper limit of 40 years is typical for a solar farm, although applicants may seek consent without specifying a time-period or for differing time-periods of operation. Paragraph 2.10.60 goes on to note that decommissioning of solar PV panels can be achieved relatively easily and cheaply.
- 3.5.2 Impacts on the use of the land are assessed in the ES. The Applicant is seeking a time limited consent, and the Proposed Development will be operational for up to 60 years, after which time it will be decommissioned and the land returned to its original condition. Despite the reference in EN-3 to 40 years, the majority of solar NSIPs are now seeking a time limited consent for 60 years, consistent with advances in technology – see, for example, West Burton Solar Farm which was granted a 60-year consent in January 2025.
- 3.5.3 In line with Paragraph 2.10.61 of EN-3, the ES sets out how the Proposed Development would be decommissioned at the end of the operational life of the generating station. The **Draft DCO [EN0110020/APP/3.1]** includes a requirement that the Proposed Development must be decommissioned in accordance with the **Outline Decommissioning Environmental Management Plan (oDEMP) [EN0110020/APP/5.11]** which will include a waste management plan for this phase of the Proposed Development.

### 3.6 Construction, Operation and Decommissioning

#### Construction

- 3.6.1 The construction phase is anticipated to take approximately 24–36 months in total. The final programme will be dependent on detailed design and environmental constraints, such as flooding ecological changes, upon the timing of construction activities. Construction activities will be undertaken in accordance

with the principles set out within the **Outline Construction Environmental Management Plan (oCEMP) [EN0110020/APP/5.9]** and the **Outline Construction Traffic Management Plan (oCTMP) [EN0110020/APP/5.12]**.

- 3.6.2 The **Outline Construction Environmental Management Plan (oCEMP) [EN0110020/APP/5.9]** has been prepared to support the DCO Application and is secured through Requirement 4 of the **Draft DCO [EN0110020/APP/3.1]**. The oCEMP sets out legislation, guidance, best practice guidance and the mitigation measures identified through the EIA process to be employed during the construction phase, such as the need for construction lighting to avoid ecological sensitive habitats. The oCEMP will form the framework for a detailed CEMP that will be agreed with the relevant planning authorities prior to construction commencing.
- 3.6.3 The **Outline Construction Traffic Management Plan (oCTMP) [EN0110020/APP/5.12]** has been prepared and submitted to support the DCO application and is secured through Requirement 5 of the **Draft DCO [EN0110020/APP/3.1]**. The oCTMP includes details of construction logistics and construction worker travel. Information is also provided to guide the delivery of material, plant, equipment and staff during the construction phase. The oCTMP will form the framework for a detailed CTMP that will be agreed with the relevant planning authority prior to construction commencing.

### Operation

- 3.6.4 During the operational phase of the Proposed Development, onsite activities in any one area of the Site will be minimal and will principally relate to vegetation management, equipment maintenance and the servicing, replacement and renewal of any components that fail, as well as monitoring and inspection.
- 3.6.5 There will typically be up to 15 members of permanent staff onsite during the operational phase of the Proposed Development who will be undertaking the ongoing maintenance. However, when larger scale maintenance is required, for example for the replacement of panels or other apparatus as part of the Proposed Development, additional staff members will be required to assist.
- 3.6.6 An Operational Environmental Management Plan (OEMP), which will be produced in accordance with the **Outline Operational Environmental Management Plan (oOEMP) [EN0110020/APP/5.10]** and is secured through Requirement 13 of the **Draft DCO [EN0110020/APP/3.1]**. The oOEMP will include measures which control elements including working hours, lighting, parking, security and monitoring of electrical equipment and drainage, material storage, management of other vegetation and permissive paths, as well as noise limits and management of waste.

### Decommissioning

- 3.6.7 Decommissioning will include the removal of all above ground infrastructure, including the BESS and Substation foundations. Permissive paths will also be removed. Underground cables may remain in situ. Trees and hedgerows planted as part of the Proposed Development are assumed to remain in situ when the land is returned to the landowners.
- 3.6.8 The Proposed Development is expected to be operational for up to 60 years, after which time it will be decommissioned and the land returned to its original condition

(other than established habitats provided as part of the Proposed Development which are assumed to remain).

- 3.6.9 It is expected that all of the solar PV modules and batteries used as part of the Proposed Development will be recycled. This will be secured via the Decommissioning Environmental Management Plan (DEMP), which will be produced in accordance with the **Outline Decommissioning Environmental Management Plan (oDEMP) [EN0110020/APP/5.11]** and is secured through Requirement 15 of the **Draft DCO [EN0110020/APP/3.1]**.

# 4 NEED FOR AND BENEFITS OF THE PROPOSED DEVELOPMENT

## 4.1 Need for the Proposed Development

- 4.1.1 This section sets out the need for the Proposed Development and how it is supported by both international and national legislation and policy. It summarises key points from the **Statement of Need [EN0110020/APP/5.8]** and includes a summary of the benefits delivered by the Proposed Development.
- 4.1.2 Urgent and unprecedented action is required on a global scale to halt climate change. A rapid increase in the supply of low carbon electricity is needed for the UK to meet its legally binding climate change targets. Solar generation is a critical part of the UK's strategy to achieve net zero by 2050, a key step towards which is the government's national mission for 'Clean Power by 2030'. This is further explained within Chapter 3 of the **Statement of Need [EN0110020/APP/5.8]**.
- 4.1.3 As demonstrated within NPS EN-1, there is a clear urgent need for the type of development that this application will provide. Paragraph 3.2.1 of NPS EN-1 highlights that solar infrastructure is a core part of meeting the Clean Power 2030 Mission given it is 'secure, reliable, affordable, and consistent with net zero emissions in 2050'.
- 4.1.4 EN-1 notes that the SoS should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated a need for this type of infrastructure being urgent. This is further set out specifically within EN-1 paragraphs 3.2.8 - 3.2.10. Paragraph 3.2.10 specifically *notes that "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."*
- 4.1.5 The NPSs, which were published in November 2025 and came into force in January 2026, established the urgent need for new renewable energy generation, to which substantial weight should be given in the determination of an application for development consent. This section discusses the key drivers underpinning the need for renewable energy within the UK and the Government's policy that there is an urgent need for new energy NSIPs.
- 4.1.6 The NPSs (EN-1 Paras 4.2.17 and 4.2.18, and EN-3 Para 2.1.7) confirm that all onshore and offshore electricity generation which does not involve fossil fuel combustion such as large-scale ground-mounted solar farms have a critical role to play in achieving the government's aims and establishes a critical national priority (CNP) for low-carbon infrastructure, including largescale solar farms, because of the decarbonisation, energy security and affordability benefits that they deliver.
- 4.1.7 The NPSs (EN-1 Paras 2.4.11 and 3.3.25, and EN-3 Para 2.10.20) also confirm that assets which provide flexibility to the national electricity system, or to the energy system generally, are also needed to achieve national decarbonisation and energy security aims. The NPSs state that government is supportive of solar that is co-located with storage to maximise the efficiency of land use. The

Proposed Development, which is a large-scale solar plus energy storage scheme, is therefore fully aligned with the government's aims.

- 4.1.8 NPS EN-3 Paragraphs 2.10.11 and 2.10.12 explain that the availability of grid connection, suitable irradiance levels and local topography are key inputs to the selection of sites suitable for large-scale solar generation developments. The number of locations within the UK where large-scale solar generation is suitable is therefore likely to be limited, and this is a material issue when considering how the UK is to meet the urgent need for low-carbon generation as is set out in the NPSs.
- 4.1.9 The Government's Clean Power Action Plan 2030, published in December 2024 and last updated in April 2025, reinforces the urgent need for low carbon generation schemes to come forwards to pave the way to decarbonising the wider economy by 2050 as we pursue the electrification of heat in buildings, transport, and industry.
- 4.1.10 However, the need for new clean power will not stop at 2030. The continued delivery of low-carbon generation facilities beyond 2030 is necessary to meet future electricity demand growth and achieve essential wider societal carbon savings. 'As the Clean Power Action Plan 2030 makes clear, clean power by 2030 will prepare the grid network for the rapid growth in power demand expected over the 2030s and 40s. It is also important to continue to bring forward schemes in the event that the Government's clean power 2030 target is not achieved.
- 4.1.11 The **Statement of Need [EN0110020/APP/5.8]** concludes that the decarbonisation, security of supply and affordability benefits delivered by the Proposed Development to the national urgent need for low-carbon generation should be afforded substantial weight in the planning balance.

## 4.2 National Policy Context

- 4.2.1 The legally-binding framework to achieve net zero set out in the Climate Change Act 2008 underpins the urgent need for the delivery of large capacities of both consentable and affordable electricity generation schemes which make best use of Great Britain's natural low-carbon energy resources and available grid connection points.
- 4.2.2 Paragraph 4.2.1 of EN-1 sets out that the "*Government has committed to fully decarbonising the power system by 2035, subject to security of supply, to underpin its 2050 net zero ambitions*". To fully decarbonise the power system within such timeframes, the Government has concluded, through paragraph 4.2.16 of EN-1, that "*there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure*".
- 4.2.3 The critical national priority for nationally significant low-carbon infrastructure, which includes solar PV, is set out in paragraph 4.2.17 of EN-1. The urgent national need for energy-generating stations set out in both EN-1 and EN3 is of great significance to the determination of the Proposed Development. Paragraph 3.3.63 of EN-1 explains that:
- "Subject to any legal requirements, the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible"*.

- 4.2.4 In addition to the recognised need to deploy nationally significant low carbon CNP infrastructure, EN-1 also recognises that the UK's energy security and Net Zero ambitions will "only" be delivered if we can enable the development of new low-carbon sources of energy at both "speed and scale."
- 4.2.5 Paragraph 4.2.17 of EN-1 defines the relevant low carbon infrastructure that is captured by CNP policy. It states that for electricity generation this relates to "*all onshore and offshore generation that does not involve fossil fuel combustion*". There is a presumption under the NPSs that the urgent need for CNP infrastructure will outweigh any residual adverse effects in all but the most exceptional cases (paragraph 4.1.7 of EN-1). This presumption does not apply to residual impacts that present an unacceptable risk to, or interference with, human health and public safety, defence, irreplaceable habitats, or unacceptable risk to achieving net zero. Where no such residual impacts exist, the presumption weighs in favour of the need for CNP infrastructure.
- 4.2.6 The NPSs demonstrate that the need for solar technology (as a renewable, low-carbon source of energy) in the UK is urgent and significant and has increased, with nationally significant solar technology now defined as CNP infrastructure (EN-1 Paragraph 3.3.62).
- 4.2.7 The **Statement of Need [EN0110020/APP/5.8]** explains that the development of large-scale solar generation reflects the national policy position that there is a critical national priority for nationally significant low-carbon infrastructure, including solar generation, and that solar is a key part of the national strategy for low-cost decarbonisation of the energy sector. It builds upon the case made in the NPSs to demonstrate why the development such as the Proposed Development is urgently needed at the scale proposed, why the proposed location is highly suitable for such a scheme, and how the Proposed Development also addresses all relevant aspects of established and emerging government energy and climate change policy and commitments.

### 4.3 Other Benefits of the Proposed Development

- 4.3.1 The Proposed Development will deliver other benefits as well as significantly contributing to meeting policy commitments and legal decarbonisation targets for securing renewable energy. These benefits occur during different stages of the Proposed Development's lifetime. The Proposed Development includes the following other benefits:
- Existing hedgerows, woodland, ditches, ponds and field margins will be retained and enhanced within the Order Limits, with the exception of small breaks and/or crossings required for new access tracks, security fencing, cable routes and new access junctions.
  - Ecological enhancement measures will result in a secured commitment to deliver a minimum of 10% in Biodiversity Net Gain, with the following proposed unit breakdown, as secured in the **Draft DCO [EN0110020/APP/3.1]**:
    - Area Habitat Units = 28.35%
    - Hedgerow Units = 30%
    - Watercourse Units = 10.11%
  - Improvements to Brampton Common Local Wildlife Site (LWS) which is currently not in a favourable condition and not being managed to benefit

the features it was designated for. This includes reinstating a favourable condition to the hedgerow and grassland habitats to support breeding skylark and help provide visual character and distinctiveness beyond that currently present.

- Creation of 14.58km of permissive paths throughout the Order Limits to provide new connections to extend options and routes for pedestrians, equestrians and cyclists;
- Creation of jobs during all three phases of the Proposed Development, including construction, operation and maintenance and decommissioning; and
- Soil improvement – due to the limited application of agricultural practices there is a proposed beneficial effect on the land and soils.

## 5 DESIGN APPROACH

- 5.1.1 In accordance with policy requirements, the approach to achieving good design was considered at the outset for the Proposed Development, and the Applicant developed a framework for good design which was then used to inform the proposals from an early stage. Further information on the approach is set out in the **Design Approach Document [EN0110020/APP/5.7]**.
- 5.1.2 Good design outcomes will be secured in the detailed design stage of the Proposed Development, in accordance with the EIA, via control documents secured by the **Draft DCO [EN0110020/APP/3.1]**. Adherence to the control documents will secure good design outcomes, with mitigation to manage the Proposed Development in accordance with the conclusions of the ES whilst providing flexibility where required. A full list of control documents is set out in the **Guide to the Application [EN0110020/APP/1.3]** in section 3.3. A full list of commitments is set out in the **ES Appendix 2.3: Commitments Register [EN0110020/APP/6.20]**.
- 5.1.3 The Applicant adopted 11 Design Principles to guide the design of the Proposed Development at the early stages of the project, which are informed by both the United Nations Sustainable Development Goals and National Infrastructure Commission. These Design Principles are set out in section 2.4 of the **Design Approach Document [EN0110020/APP/5.7]**.
- 5.1.4 The Design Principles are based on an understanding of the Proposed Development's local context, the people it could affect, and the potential benefits and outcomes it can deliver. The Design Principles drive design-related decision making throughout the Proposed Development's lifecycle and are continually tested and improved in response to further baseline survey work, design evolution, environmental assessment, and stakeholder feedback to secure appropriate outcomes at detailed design. All the Design Principles are described in section 2.4 of the **Design Approach Document [EN0110020/APP/5.7]**.
- 5.1.5 Good design has been a fundamental consideration from the outset of the Proposed Development. The **Design Approach Document [EN0110020/APP/5.7]** demonstrates how good design has been embedded in the Proposed Development via the Design Principles, how they have provided a shared understanding of desired outcomes for the Proposed Development, provided a framework for decision making, and ultimately driven good design outcomes that will be secured by the **Draft DCO [EN0110020/APP/3.1]**.
- 5.1.6 The policy and guidance documents that have informed the Applicant's approach to good design include EN-1, EN-3 and the National Infrastructure Commission's (NICs) 'Design Principles for National Infrastructure' report. The **Policy Compliance Document [EN0110020/APP/5.5]** provides a comprehensive assessment of the Proposed Development against the aforementioned policies and guidance documents. The Applicant has prepared the **Design Approach Document [EN0110020/APP/5.7]** in accordance with the Planning Inspectorate's advice on Good Design for Nationally Significant Infrastructure Projects, using the structure in terms of each element 'Assemble, Research, Coordinate and Secure' as the starting point and subsequent structure for the **Design Approach Document [EN0110020/APP/5.7]**.
- 5.1.7 The final **Design Approach Document [EN0110020/APP/5.7]** not only describes the design rationale for the final illustrative masterplan, but also the process and

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key decisions taken, as well as the proposed approach to detailed design and how this will be controlled within the parameters assessed. It is therefore considered the Proposed Development is in accordance with this guidance, and a design-led approach has been taken. In addition, the Applicant has ensured that the design has evolved throughout the course of positive engagement to ensure it aligns with the relevant policy and guidance documents in relation to good design.

# 6 LEGISLATION AND POLICY FRAMEWORK

## 6.1 Overview

- 6.1.1 This section provides an overview of the legislative framework and the planning policy context for the Proposed Development. Section 8 outlines how the Proposed Development complies with this context where relevant.
- 6.1.2 In addition to the below, other relevant topic-specific legislation has been considered where required and those relevant to the Environmental Statement are noted in the relevant legislation appendices.

### Legislative Context

- 6.1.3 The Planning Act 2008 (PA 2008) established the legal framework for applying for, examining and determining applications for NSIPs.
- 6.1.4 As a generating station in England with capacity in excess of 100 MW that generates electricity directly from sunlight, the Proposed Development meets the definition of an NSIP as set out at sections 14(1)(a), 15(1) and 15(2) of the PA 2008. In accordance with Part 4 of the PA 2008, development consent is required for the Proposed Development to the extent that it is or forms part of an NSIP.
- 6.1.5 Part 5 of the PA 2008 sets out that an application for an order granting development consent must be made to the SoS. The approach taken to pre-application and engagement was designed to ensure compliance with the statutory requirements set out in sections 42, 47, 48, 49 and 50 of the PA 2008 while also exceeding these minimum requirements to ensure best practice. A **Consultation Report [EN0110020/APP/5.1]** has been prepared that details compliance with sections 42, 47, 48, 49 and 50 of the PA 2008
- 6.1.6 Part 6 of the PA 2008 applies when determining applications for orders granting development consent. Sections 103 to 107 provide the framework for decision-making, which in turn frames the focus of the examination of the application for a development consent order. Section 104 applies when relevant NPS has effect for a NSIP.
- 6.1.7 In addition to the above, under section 104(2) of the PA 2008, the SoS must have regard to:
- Any national policy statement which has effect in relation to development of description to which the application relates (a relevant national policy statement);
  - Any local impact report submitted;
  - Any matters prescribed in relation to development of description to which the application relates; and
  - Any other matters which the SoS thinks are both important and relevant to the SoS's decision.

- 6.1.8 Section 104(3) of the PA 2008 notes that the SoS must decide the Application in accordance with any relevant National Policy Statement(s), except to the extent that one or more of subsections (4) and (8) of section 104 apply which relate to:
- (4) where deciding an application with the relevant national policy statement would lead to the United Kingdom being in breach of any of its international obligations.*
- (5) where deciding an application in accordance with the relevant national policy statement would lead to the SoS being in breach of any duty imposed on themselves by or under any enactment.*
- (6) Where deciding an application in accordance with the relevant national policy statement would be unlawful by virtue of any enactment.*
- (7) Where the SoS is satisfied that the adverse impact of the proposed development would outweigh its benefits.*
- (8) Where the SoS is satisfied that any condition prescribed for deciding an application otherwise than in accordance with a national policy statement is met.*
- 6.1.9 The Applicant's response to the specific requirements of Section 104 is set out in Section 8 of this Planning Statement, including confirmation that none of the exceptions in subsections (4) to (8) apply in relation to the Proposed Development.
- 6.1.10 For the purpose of Section 104(2)(a) of the PA 2008, the following NPSs have effect in relation to the Proposed Development:
- Overarching NPS for Energy (2025) (EN-1);
  - NPS for Renewable Energy Infrastructure (2025) (EN-3); and
  - NPS for Electricity Networks Infrastructure (2025) (EN-5).
- 6.1.11 In addition, the Applicant considers that the following planning policy documents are both important and relevant to the SoS's decision:
- National Planning Policy Framework (NPPF) 2024.
- 6.1.12 It is expected that the host local authorities will submit Local Impact Reports (LIRs); the neighbouring authorities may also submit a LIR. The reports should give details of the likely impact of a project on the local authority's area. Section 104(2)(b) of the PA 2008 explains that the Examining Authority and the SoS must have regard to any LIR submitted when deciding the application, as explained in the updated advice on Nationally Significant Infrastructure Projects: Advice for Local Authorities.
- 6.1.13 Finally, the Applicant considers that there are a number of other legislative and policy documents, as summarised below, that are important and relevant to the SoS's decision. The **Policy Compliance Document [EN0110020/APP/5.5]** provides a comprehensive assessment, which should be read in conjunction with this section.

## 6.2 National Policy Statements

- 6.2.1 The UK Government produces National Policy Statements, and the Energy NPSs (EN-1 to EN-6) set out the Government's policy for the delivery of energy infrastructure and provide the legal framework for planning decisions for major infrastructure projects.

- 6.2.2 EN-1, EN-3, and EN-5 provide the primary policy basis for deciding a DCO Application. EN-1 provides the overarching policy position, and solar PV generation falls within the EN-1 definition of CNP infrastructure. EN-3 outlines the SoS's decision making for solar PV generation considerations. EN-5 provides guidance for developers of nationally significant electricity network infrastructure projects.
- 6.2.3 There is a presumption under the NPSs that the urgent need for CNP infrastructure will outweigh any residual adverse effects in all but the most exceptional cases. This presumption does not apply to residual impacts that present an unacceptable risk to, or interference with, human health and public safety, defence, irreplaceable habitats, or unacceptable risk to achieving net zero. Where no such residual adverse impacts exist, the presumption weighs in favour of the need for CNP infrastructure where it has been demonstrated that the mitigation hierarchy has been applied.

### Overarching National Policy Statement for Energy (EN-1)

- 6.2.4 EN-1 sets out the national policy for the delivery of energy infrastructure, including solar renewable electricity generation.
- 6.2.5 Part 3 of EN-1 paragraph 3.1.1 explains that the UK Government sees a need for significant amounts of new large scale energy infrastructure to meet its energy objectives and why the UK Government considers that the need for such infrastructure is urgent.
- 6.2.6 The Overarching NPS for Energy EN-1 goes on to stress, through paragraph 4.2.16, that "there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure." Low carbon infrastructure includes solar electricity generation that does not involve fossil fuel combustion.
- 6.2.7 Part 3.3 of EN-1 identifies the need for nationally significant energy infrastructure to address energy security objectives and carbon reduction requirements, replace closing generating capacity, and support an increase in renewables supply. The Assessment Principles (part 4) and Generic Impacts (part 5) provide a framework of considerations across energy technologies.

### National Policy Statement for Renewable Energy Infrastructure (EN-3)

- 6.2.8 EN-3, together with EN-1, provides the primary basis for decisions on renewable energy NSIPs.
- 6.2.9 The importance of the generation of electricity from renewable sources is stated in Paragraph 1.1.2 of EN-3:  
*"Electricity generation from renewable sources is an essential element of the transition to Clean Power 2030 Mission, net zero and meeting our statutory targets for the sixth carbon budget (CB6). Our analysis suggests that demand for electricity is likely to increase significantly over the coming years and could more than double by 2050".*
- 6.2.10 EN-3 provides a framework for assessment and technology-specific information for specified renewable energy technologies. Solar PV is included in EN-3 under Section 2.10, which includes relevant information on the technology to inform assessment and decision-making.

## National Policy Statement for Electricity Networks Infrastructure (EN-5)

- 6.2.11 The NPS for Electricity Networks Infrastructure (EN-5) is the primary basis for decisions on transmission and distribution system NSIPs and associated infrastructure. EN-5's relevance to the Proposed Development is limited to the grid connection. EN-1 paragraph 4.11.4 on grid connection refers to EN-5 for further guidance on relevant considerations, including the impact of electromagnetic fields (EMFs).

## 6.3 National Planning Policy Framework

- 6.3.1 The NPPF (adopted December 2024) sets out the national planning policies for England and how they should be applied. Paragraph 5 of the NPPF confirms that it does not contain specific policies for NSIPs but that the NPPF may be a relevant matter in decision making. Whilst not specifically addressing NSIPs, the NPPF does set out its objectives to achieve sustainable development by pursuing economic, social and environmental objectives in development.
- 6.3.2 The Government published a proposed approach to revising the National Planning Policy Framework in December 2025, which ran until March 2026.
- 6.3.3 As the Government has yet to confirm the outcome of this consultation, the adopted version of the NPPF is used where considering compliance with policy in this Planning Statement, however, the proposed changes are referred to where relevant.

## 6.4 Local Planning Policy

- 6.4.1 The Proposed Development lies within the four administrative boundaries of RMBC, CDC, NEDDC and DDC. Therefore, the local planning policies that may be important and relevant to the Proposed Development comprise the following:

### Rotherham Metropolitan Borough Council

- Local Plan consisting of:
  - Core Strategy (adopted 2014)
  - Sites and Policies document (adopted 2018)
  - The Barnsley, Doncaster and Rotherham joint waste plan (adopted 2012)
  - Wickersley Neighbourhood Plan (adopted 2022)
- Air Quality and Emissions Supplementary Planning Document (adopted June 2022)
- Development in the Green Belt Supplementary Planning Document (adopted July 2023)
- Natural Environment Supplementary Planning Document (adopted June 2021)
- Transport Assessments, Travel Plans and Parking Standards Supplementary Planning Document (adopted June 2021)

- Trees Supplementary Planning Document (adopted July 2023)
- Preparing a Soils Strategy Supplementary Planning Document (adopted July 2023)

### City of Doncaster Council

- Doncaster Local Plan (adopted 2021)
- The Barnsley, Doncaster and Rotherham joint waste plan (adopted 2012)
- Doncaster Infrastructure Strategy (updated 2020)
- Green Infrastructure Strategy 2014-2028: Creating a Greener, Healthier and more Attractive Borough (adopted 2014)
- Doncaster Renewable and Low Carbon Energy (adopted 2012)
- Biodiversity Net Gain Supplementary Planning Document (September 2022)
- Flood Risk Supplementary Planning Document (adopted August 2023)

### North East Derbyshire District Council

- Adopted North East Derbyshire Local Plan 2014 – 2034 (adopted 2021)

### Derbyshire District Council

- Derby and Derbyshire Minerals Local Plan (adopted 2000)
- Derby and Derbyshire Waste Local Plan (adopted 2005)
- Derbyshire Spatial Energy Study (2022)

### Emerging Local Planning Policy

- 6.4.2 NEDDC is preparing a new Local Plan to replace the current plan that was adopted in November 2021. Public engagement has commenced, and NEDDC undertook some early work in the community in May 2025 and recently concluded a more structured and formal public consultation on Issues and Options for the Local Plan between 19 June 2025 and 14 August 2025. A second round of public consultation on the emerging Local Plan took place for 7 weeks from 12 March 2026.
- 6.4.3 It should be noted that as the emerging local plan is in very early stages of the adoption process, it holds very limited weight and therefore the adopted North East Derbyshire Local Plan 2014 – 2034 has been focused upon for this Proposed Development.

## 6.5 Other Policy and Legislation

### The Climate Change Act 2008

- 6.5.1 The Climate Change Act 2008 (CCA 2008) set up a framework for the UK to achieve its long-term goals of reducing greenhouse gas emissions and to ensure steps are taken towards adapting to the impact of climate change. The Act

originally committed the UK to reducing its net greenhouse gas emissions by at least 80% by 2050 when compared with 1990 levels.

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

- 6.5.2 In June 2019, legislation was enacted to amend CCA 2008 setting a new target requiring the UK to bring net greenhouse gas emissions to net zero (i.e. 100% reduction by 2050), compared with the previous target of at least 80% reduction from 1990 levels.

### A Green Future: Our 25-Year Plan to Improve the Environment

- 6.5.3 The 25-Year Environmental Plan published in 2025 sets out the Government's 25-year plan to improve the environment within a generation. It aims to deliver cleaner air and water in our cities and rural landscapes, protect threatened species, and provide richer wildlife habitats. It calls for an approach to agriculture, forestry, land use and fishing that puts the environment first.
- 6.5.4 It sets out 10 goals which include the achievement of and management of pressure by providing: restored nature; clean air; clean water; minimise environmental risks from chemicals and pesticides; minimise waste; sustainable use of resources; reduced greenhouse gas emissions and prepare for the effects of climate change; reduced environmental hazards; enhanced biosecurity; and access to nature.

### Net Zero Strategy: Build Back Greener

- 6.5.5 The Net Zero Strategy, published by the Government in October 2021, builds on the Government's commitments made in the Energy White Paper (2020) and sets out the long-term strategy, policy and proposals to keep the UK on track for future carbon budgets and sets the vision for a decarbonised economy by 2050. Key policies in the Strategy related to UK power generation include:

*"By 2035 the UK will be powered entirely by clean electricity, subject to security of supply; [...] 40 GW of offshore wind by 2030, with more onshore, solar and other renewables – with a new approach to onshore and offshore electricity networks to incorporate new local carbon generation and demand in the most efficient manner that takes account of the needs of local communities [...]"*

### Net Zero: Opportunities for the Power Sector

- 6.5.6 In June 2019, the Government raised the UK's ambition on tackling climate change by legislating for a net-zero greenhouse gas emissions target for the whole economy by 2050. Decarbonising the power sector is integral to achieving this goal and requires major investment in proven technologies, such as solar, which are supported by planning policy at local and national levels.
- 6.5.7 The National Infrastructure Commission (NIC), the official advisor to the Government on infrastructure, has subsequently produced a report, 'NetZero: Opportunities for the Power Sector', in March 2020, which sets out the infrastructure required in order to meet the 2050 target, including the amount of

new renewable energy development that would need to be deployed. Importantly, the NIC recommends that the generation mix is up to around 90% renewables. The report recommends that across all scenarios, significant solar, onshore wind, and offshore wind, with between 129-237 GW of renewable capacity, is in operation by 2050 including:

- 56-121 GW of Solar;
- 18-27 GW of onshore wind; and
- 54-86 GW of offshore wind.

- 6.5.8 The above requires an increase in installed capacity, including up to nine times more solar that is currently installed in the UK, which is presently around 22 GW according to the Solar Photovoltaics deployment, February 2026 published by the Department for Energy Security and Net Zero (DESNZ).
- 6.5.9 Although the above figures are high-level, they demonstrate the amount of new infrastructure that is required. The scale of this need is such that it must be shared throughout the UK and in recognition that climate change is both a national and global issue.

### UK Infrastructure: A 10 Year Strategy

- 6.5.10 UK Infrastructure: A 10 Year Strategy published in June 2025 sets out the long-term approach which is backed by at least £725 billion of government funding for infrastructure over the next decade. One aim of the strategy is to increase energy transmission and distribution network capacity by *“supporting the sector to deliver the investment needed to enable clean power and support economic growth and development.”* The government’s mission is for the UK to become a clean energy superpower by 2030 through measures including the delivery of flexible, low carbon electricity and using technology such as solar energy to decarbonise heat and buildings.

### Environment Act 2021

- 6.5.11 The Environment Act 2021 makes provisions about targets, plans and policies for improving the natural environment. Schedule 15 of the Environment Act 2021 explains biodiversity net gain in nationally significant infrastructure projects. Although these provisions are not yet in force, it is expected that they will come into force on 2 November 2026 at which point they will lead to the imposition on applications made from that date of a requirement for the *“biodiversity value attributable to the development [to] exceed the predevelopment biodiversity value of the on-site habitat by at least 10%”*.

### British Energy Security Strategy

- 6.5.12 In April 2022, the Government published the British Energy Security Strategy, which demonstrates the need for secure, clean and affordable British energy for the long term. This states that the Government will be supportive of the effective use of land by encouraging large-scale projects to be located on previously developed or lower-value land, where possible, and to ensure projects are designed to avoid, mitigate, and, where necessary, compensate for the impacts of

using greenfield sites. The Government will also support solar that is co-located with other functions (for example, agriculture, onshore wind generation, or storage) to maximise the efficiency of land use.

### Powering Up Britain

6.5.13 Powering up Britain sets out the government's plan to enhance the UK's energy security, seize economic opportunities in the transition and deliver on net zero commitments. The paper is focused on the transition between UK oil and gas to renewable energy sources. In order to meet its goal of quintupling its solar power by 2035, the paper states, regarding large-scale solar development. *"Government seeks large scale solar deployment across the UK, looking for development mainly on brownfield, industrial and low/medium grade agricultural land. The Government will therefore not be making changes to categories of agricultural land in ways that might constrain solar deployment"*. Powering Up Britain sets out the department's approach to energy security and net zero, and acts as an introduction to Powering Up Britain: Energy Security Plan, and Powering Up Britain: Net Zero Growth Plan, both of which are complementary and should be read alongside each other.

- The Powering Up Britain: Energy Security Plan sets out the steps the Government is taking to ensure greater energy independence, security, and resilience in the UK. The plan recognises the importance of energy imports but also states the need to build resilience and security which will prevent disruption to consumers if imports are disrupted.
- The Powering Up Britain: Net Zero Growth Plan sets out that energy security and net zero can be achieved together, that cleaner and cheaper energy can maintain a lower cost for consumers whilst also being secure from global disruption. The plan also discusses how the benefits of net zero are not just limited to environmental health but also provide new opportunities for the UK economy to grow (i.e. green, high-skilled jobs).

### Clean Power 2030 Action Plan (December 2024)

6.5.14 The Clean Power 2030 Action Plan sets out a pathway to a clean power system by 2030. The Action Plan will herald a new era of clean energy independence and tackle three major challenges: the need for a secure and affordable energy supply, the creation of essential new energy industries, supported by skilled workers in their thousands, the need to reduce greenhouse gas emissions and limit our contribution to the damaging effects of climate change.

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

6.5.15 The Energy White Paper: Powering our Net Zero Future (2020) was published in December 2020 and outlines a strategy to transform the energy system, tackling emissions while continuing to ensure secure and reliable supply, and affordable bills for households and businesses.

# 7 ENGAGEMENT

## 7.1 Overview

7.1.1 The Applicant has undertaken a continuous programme of engagement in parallel with, and complementary to, its formal phases of pre-application consultation. The formal phases of pre-application consultation included the following:

- Early Engagement between 01 November 2024 to 18 November 2024
- Non-Statutory Consultation between 18 November 2024 and 31 January 2025
- Statutory Consultation between 16 September 2025 and 28 October 2025
- Targeted Consultation between 04 March 2026 and 03 April 2026
- Second Targeted Consultation between 16 April 2026 and 18 May 2026

7.1.2 Further information on the pre-application consultations and ongoing engagement can be found within the **Consultation Report [EN0110020/APP/5.1]**.

7.1.3 As a result of feedback from engagement and consultation activities, the Applicant has made significant changes to the Proposed Development. These changes are further set out within the **Consultation Report [EN0110020/APP/5.1]** and **Design Approach Document [EN0110020/APP/5.7]** and secured in the both the **Works Plans [EN0110020/APP/2.3]** and **Outline Design Parameters [EN0110020/APP/7.3]**.

7.1.4 Some of the changes that were made as a result of the engagement and consultation feedback, as documented in the above documents, included:

- Conisbrough - Withdrew proposed solar by 300 m from southern edge of Conisbrough, reducing visual impact from the southern edge of the settlement and in views experienced when travelling along Sheffield Road.
- Wider land in W1 - Expansion of offsets from PRowS, maintaining one side open in several instances in response to feedback explaining the importance of the routes for recreation.
- Ulley - Removal of proposed solar panels north of Ulley to minimise impact on the setting and views from the village, and to fragment the Proposed Development across the wider landscape.
- Brampton en le Morthen - Removal of proposed solar panels on land south west of village to preserve sense of arrival to village from the west.
- Woodall and Harthill - Removal of proposed solar on land between Woodall and Harthill, north of Harthill Reservoir, to maintain openness between the two villages and reduce visual impact.
- High Moor - Increased offset from High Moor, siting solar beyond landform to minimise potential for visual impact from settlement.

## 7.2 Potential Main Issues for Examination

7.2.1 The Applicant has submitted the **Potential Main Issues for Examination [EN0110020/APP/5.6]** document with the DCO application which sets out the

main points of discussion between the Applicant and various stakeholders including:

- City of Doncaster Council;
- Rotherham Metropolitan Borough Council;
- North East Derbyshire District Council;
- Environment Agency;
- Historic England;
- Natural England; and
- Yorkshire Wildlife Trust.

7.2.2 The **Potential Main Issues for Examination [EN0110020/APP/5.6]** will form the basis of the Statements of Common Ground (SoCGs) which will be progressed over the course of examination.

### 7.3 Statements of Common Ground

7.3.1 As part of this engagement, the Applicant is working towards the preparation of various SoCGs. The SoCGs will adopt a standard format which ensures consistency in the approach taken to document matters that are agreed, under discussion and/or not agreed between the Applicant and statutory bodies.

7.3.2 While no SoCGs are being submitted with the application, the Applicant will be progressing SoCGs with the following stakeholders for submission during the Examination stage:

- City of Doncaster Council
- Rotherham Metropolitan Borough Council
- North East Derbyshire District Council
- Derbyshire County Council
- Natural England
- Historic England
- Environment Agency

7.3.3 At the time of submission of the SoCGs they will be supplemented by a Statement of Commonality. The Statement of Commonality will set out a summary of the areas of both agreement and disagreement with the various stakeholders in one document. This document would be a live document that continues to be updated throughout the course of examination as/when updates to the SoCGs are made.

## 8 PLANNING ASSESSMENT

### 8.1 Overview

- 8.1.1 This section of the Planning Statement considers how the Proposed Development complies with relevant policy. Emphasis is placed on the Energy NPSs, which are the relevant NPSs for determination of the DCO Application and so are the primary policy basis for the SoS's decision. However, reference has been made to the NPPF and local planning policies where they could form important and relevant considerations to the SoS's decision.
- 8.1.2 This section assesses the Proposed Development against Part 4 of EN-1 (Assessment Principles), Part 2.10 of EN-3 (solar photovoltaic generation) and the relevant parts of EN-5. It provides a summary of the Proposed Development's compliance with the key relevant policy on a topic-by-topic basis.
- 8.1.3 This section is not intended to list all relevant planning policies but instead focuses on the Proposed Development's compliance with the main policies relevant to decision-making. The **Policy Compliance Document [EN0110020/APP/5.5]** provides a more detailed analysis of the specific policies relevant to the Proposed Development and how the Proposed Development aligns with them.

#### Assessment Principles

- 8.1.4 Paragraph 4.1.3 of EN-1 states that, given the level and urgency of the need for infrastructure projects of the types covered by the NPSs, the SoS will start with a presumption in favour of granting consent for applications for energy NSIPs, and that presumption applies unless any more specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused.
- 8.1.5 When assessing the adverse impacts and benefits of energy NSIPs, paragraph 4.1.5 of EN-1 states that the Secretary of State should consider both the potential benefits such as meeting the need for energy infrastructure, creating jobs, delivering ecological enhancements, and providing long-term or wider gains and any potential adverse impacts, including environmental harm, long-term effects, cumulative impacts, and the effectiveness of measures to avoid, reduce, mitigate, or compensate for those impacts. Paragraph 4.3.8 further clarifies that references in EN-1 to effects, impacts, or benefits should be understood as referring to likely significant effects, likely significant impacts, or likely significant benefits.
- 8.1.6 The Secretary of State should take into account both environmental, social and economic benefits and adverse impacts at national, regional and local levels when determining the application, as noted within paragraph 4.1.6 of EN-1.
- 8.1.7 The Proposed Development provides various benefits, which are further explained within the relevant ES Chapters and in section 4.3 of this Planning Statement.
- 8.1.8 Paragraph 4.1.7 of EN-1 sets out that the technology specific NPSs require applicants to mitigate particular impacts as far as possible but should residual adverse effects remain, the Secretary of State should weigh those against the benefits of the Proposed Development. Critically, the paragraph goes on to state that for Critical National Priority (CNP) projects "*it is likely that the need case will outweigh the residual effects in all but the most exceptional cases*". Further detail

on compliance with the policies for CNP infrastructure is provided in paragraphs 8.1.14 to 8.1.21 below and within the **Policy Compliance Document [EN0110020/APP/5.5]**.

- 8.1.9 It should be noted that Paragraph 4.1.11 of EN-1 confirms that “*the energy NPSs have taken account of the National Planning Policy Framework (NPPF), the Planning Practice Guidance for England...where appropriate*”. With paragraph 1.1.2 of EN-1 reiterating that the NPSs are the primary policy documents for nationally significant energy infrastructure projects. These documents would ultimately take precedence over other policy documents should there be conflict regarding important and relevant matters due to the national significance of the infrastructure.
- 8.1.10 The local policy context for the Proposed Development is further set out within section 6 of this document above, and throughout the **Policy Compliance Document [EN0110020/APP/5.5]** which provides an assessment of compliance of the Proposed Development against both the local policies and other national policies such as the NPPF.
- 8.1.11 Paragraph 4.1.19 of EN-1 explains that the Secretary of State may also decide to take into account any development consent obligations under section 106 of the Town and Country Planning Act as amended by section 174 of the Planning Act 2008 that the Applicant agrees with the local planning authorities. At this stage, no impacts have been identified which would be required to be addressed by financial contributions and therefore such an obligation would not meet the test of necessity in the Community Infrastructure Levy Regulations 2010 (as amended).
- 8.1.12 The NPS strongly encourages early engagement with key stakeholders of the Proposed Development, which is emphasised within paragraph 4.1.20 of EN-1. This process of engagement with both public regulators and statutory bodies, alongside those likely to have an interest in the application, is set out within the submitted **Consultation Report [EN0110020/APP/5.1]**.
- 8.1.13 It is noted at paragraph 4.1.22 of EN-1 that applicants must have considered both the financial and technical viability of the Proposed Development. For the Proposed Development, it can be confirmed that the Applicant has given significance consideration to both the financial and commercial matters which informed the decision to proceed with the Proposed Development. In regards the proposed costs of the development, this is set out within the **Funding Statement [EN0110020/APP/4.2]** which also discusses how the Proposed Development may be funded as well as details of the financial position of the Applicant.

### Part 4.2 of EN-1: Critical national priority for low carbon infrastructure

- 8.1.14 Paragraph 4.2.2 explains that ensuring a smooth transition to abundant, low carbon energy generation will ensure the UK is energy independent, resilient and secure. It identifies the criticality of the deployment of “*new low carbon sources of energy at speed and scale*” in terms of our energy security and net zero ambitions.
- 8.1.15 Paragraph 4.2.16 is fundamental in highlighting the government’s position on the criticality of the delivery of low carbon infrastructure. It states within this paragraph that the “*Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure to meet the Clean Power 2030 Mission and Net Zero*”.

- 8.1.16 Paragraph 4.2.17 relates to definitions of low carbon infrastructure for the purposes of the CNP policy. It states that *"for electricity generation, all onshore and offshore generation that does not involve fossil fuel combustion"* is included as CNP. This confirms that NSIP scale solar PV development, such as the Proposed Development, is CNP. It also advises the infrastructure relating to the electricity grid is covered, including *"network reinforcement and upgrade works, and associated infrastructure such as substations"*.
- 8.1.17 Paragraph 4.2.19 notes that *"the overarching need case for each type of energy infrastructure and the substantial weight should be given to this need in assessing applications..."*. This paragraph goes on to reference earlier paragraphs in the NPS, namely 3.2.8 to 3.2.10 which confirm that applications for NSIPs covered by EN-1 should be assessed *"on the basis that the government has demonstrated that there is a need for those types of infrastructure which is urgent"* (paragraph 3.2.8). Paragraph 3.2.9 goes on to state that the Secretary of State has *"determined that substantial weight should be given to this need when considering applications for development consent"*. Further, Paragraph 3.2.10 advises that there is no requirement on the SoS to consider separately the specific contribution of any individual project in satisfying the need established in EN-1.
- 8.1.18 Paragraph 4.2.20 advises that CNP policy applies *"following the formal consideration of the need case, the impacts of the project, and the application of the mitigation hierarchy"*. Therefore, it points out that it is relevant during the Secretary of States decision making and with particular reference to any residual impacts that have been identified and should be considered by the Examining Authority when making its recommendation to the Secretary of State.
- 8.1.19 Paragraphs 4.2.23 to 4.2.26 cover the applicant's assessment and require the applicant to demonstrate how their Proposed Development meets the requirements of the NPS, such as applying the mitigation hierarchy and other relevant legal requirements. Paragraph 4.2.24 notes that applicants are required to *"apply the mitigation hierarchy and demonstrate that it has been applied"* and demonstrate that all *"residual impacts are those that cannot be avoided, reduced or mitigated"*.
- 8.1.20 Section 4.2 of EN-1 is fundamental to the consideration of this Application. It applies the CNP designation to solar PV development and sets out the framework for decision making with the presumption strongly in favour of the development. This framework includes a responsibility on the Applicant to demonstrate how the mitigation hierarchy has been applied and that residual impacts should exist only when they have been subject to application of the hierarchy. Where such residual impacts exist following the application of the mitigation hierarchy, EN1 states that they will only outweigh need in the most exceptional of cases.
- 8.1.21 This section of the Planning Statement, alongside the relevant topic chapters from the Environmental Statement sets out how potential impacts have been addressed including the measures taken to avoid, minimise and mitigate such impacts.

### Part 4.2 of EN-1: Habitats and Species Regulations

- 8.1.22 Paragraph 4.2.32 states that *"Where, following Appropriate Assessment, CNP Infrastructure has residual adverse impacts on the integrity of sites forming part of the UK national site network, either alone or in combination with other plans or projects, the Secretary of State will consider making a derogation under the Habitats Regulations"*.

- 8.1.23 Under the Conservation of Habitats and Species Regulations 2017, consideration should be given as to whether a project may have a significant effect on a protected site or any site to which the same degree of protection is applied as a matter of policy, either alone or in combination with other plans and projects. Applicants are required to supply such information as the 'competent authority' may reasonably require for the purposes of the assessment or to enable it to determine whether an Appropriate Assessment is required.
- 8.1.24 As confirmed within **ES Volume 2, Chapter 6: Biodiversity [EN0110020/APP/6.6]** the need for a Habitat Regulations Assessment and assessed of European Protected Sites was scoped out as confirmed by the Scoping Opinion from the Planning Inspectorate. With the Planning Inspectorate stating *"This is scoped out on the basis that there are no European sites present within the red line boundary or area of influence. Scoping Report paragraph 7.3.20 identifies the nearest designated sites as the South Pennine Moors Special Area of Conservation (SAC) and Special Protection Area (SPA) which is located 17.5km southwest from the nearest point of the proposed development. Given the location of the Proposed Development, the Inspectorate agrees to scope this matter out of further assessment"*.

### Part 4.3 of EN-1: Environmental Effects/Considerations

- 8.1.25 Paragraph 4.3.1 and 4.3.2 of EN-1 discuss the requirement that proposals for projects that are subject to the EIA Regulations must be accompanied by an Environmental Statement which describes the aspects of the environment that are likely to be significantly affected by the project.
- 8.1.26 Paragraph 4.3.3 specifies the range of effects, their duration, and measures for avoiding and mitigating significant effects that must be considered at all project stages.
- 8.1.27 An Environmental Statement has been produced and submitted with this DCO Application for the Proposed Development. The scope of the submitted Environmental Statement is in accordance with **ES Volume 3, Appendix 2.2: EIA Scoping Opinion [EN0110020/APP/6.20]**. In accordance with EN-1, the ES has been structured to enable a clear understanding of the Proposed Development's construction, operational and maintenance, and decommissioning phases.
- 8.1.28 Paragraph 4.3.11 acknowledges that it may not be possible for all elements of an application to be settled in precise detail at the time of submission and that the Applicant should explain where details are yet to be finalised.
- 8.1.29 Paragraph 4.3.12 goes on to state that where details are still to be finalised, the ES should assess likely worst-case environmental, social and economic effects of the Proposed Development. This is also known as the application of the 'Rochdale Envelope' approach, with further information of this set out within the Nationally Significant Infrastructure Projects – Advice Note Nine: Rochdale Envelope (2018).
- 8.1.30 **ES Volume 1, Chapter 5: The Proposed Development [EN0110020/APP/6.5]** and the **Outline Design Parameters [EN0110020/APP/7.3]** sets out the Applicant's approach, which involves specifying parameter ranges; including details of the maximum and minimum (where relevant) size, technology and locations of the different elements of the Proposed Development, for where flexibility is required to be retained.

## Part 2.3 of EN-3: Alternatives and Site Selection

- 8.1.31 **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN0110020/APP/6.4]** sets out the Applicant's approach to alternatives. **Appendix 1: Site Selection Assessment** of this **Planning Statement** demonstrates a consideration of the relevant policy and its applicability to the site selection process that the Applicant has undertaken.
- 8.1.32 4.3.9 of EN-1 states that "*the relevance or otherwise to the decision making process of the existence (or alleged existence) of alternatives to a proposed development is in the first instance, a matter of law.*" It goes on to state that "*This NPS does not contain any general requirement to consider alternatives or to establish whether the proposed project represents the best option from a policy perspective. Although there are specific requirements in relation to compulsory acquisition and habitats sites, the NPS does not change requirements in relation to compulsory acquisition and habitats sites*".
- 8.1.33 Paragraph 4.3.15 of EN-1 advises that applicants are "*obliged to include information about the reasonable alternatives they have studied in their ES. This should include an indication of the main reasons for the applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility*".
- 8.1.34 Paragraphs 4.3.16 and 4.3.17 of EN-1 further note that "*in some circumstances, the NPSs may impose a policy requirement to consider alternatives*" and that where "*there is a policy or legal requirement to consider alternatives, the applicant should describe the alternatives considered in compliance with these requirements*".
- 8.1.35 Paragraph 4.3.22 helps set the framework for decision making around alternatives and provides the key principles which should be considered when attributing weight:
- The consideration of alternatives in order to comply with policy requirements should be carried out in a proportionate manner; and
  - Only alternatives that can meet the objectives of the proposed development need to be considered.
- 8.1.36 Paragraph 4.3.23 advises that the Secretary of State should be guided by whether there is a "*realistic prospect of the alternative delivering the same infrastructure capacity...in the same timescale as the proposed development*". Paragraph 4.3.24 goes on to recognise that the SoS "*should not refuse an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site*". The paragraph continues to say that the SoS should have regard to the possibility that "*all suitable sites for energy infrastructure of the type proposed may be needed for future proposals*". There are also specific circumstances where there is a requirement to consider alternatives.
- 8.1.37 The circumstances relating to when they are required and the Applicant's response to these circumstances is set out, below:
- Paragraph 4.3.9 of EN-1 sets out that where a scheme would involve the compulsory acquisition of land or interests in land, reasonable alternatives must be considered. The DCO Application is seeking compulsory acquisition powers. Please see the **Statement of Reasons [EN0110020/APP/4.1], ES Volume 1, Chapter 4: Alternatives and**

**Design Evolution [EN0110020/APP/6.4] and Appendix 1: Site Selection Assessment** to this Planning Statement regarding consideration of alternatives.

- Paragraph 5.2.7 of EN-1 sets out that where a scheme would be located near a sensitive receptor site for air quality, reasonable alternatives must be considered. The Proposed Development is partly located within the Rotherham Air Quality Management Area 1. A total of 36.2 ha (a very small proportion of the overall Site) is located within the AQMA. As set out within **ES Volume 2, Chapter 12: Air Quality [EN0110020/APP/6.12]** all impacts are to be mitigated sufficiently and therefore the assessment concludes impacts to be not significant through implementation measures. These measures are set out within the **Outline Construction Environmental Management Plan [EN0110020/APP/5.9]**.
- Paragraph 5.4.42 of EN-1 sets out that where a scheme would lead to significant harm to biodiversity and geological conservation interests, reasonable alternatives must be considered. The Proposed Development would not likely give rise to significant harm on such receptors, as reported in **ES Volume 2, Chapter 6: Biodiversity and Nature Conservation [EN0110020/APP/6.6]**, **ES Volume 2, Chapter 9: Ground Conditions and Land Quality [EN0110020/APP/6.9]** and **ES Volume 2, Chapter 10: Water Resources and Flood Risk [EN0110020/APP/6.10]**.
- Paragraph 5.4.6 of EN-1 sets out that where a scheme would result in an adverse effect on the integrity of a European site that cannot be avoided, reasonable alternatives must be considered. The Proposed Development does not interact with any European Sites, and therefore there is no requirement to consider alternatives under this regime.
- Paragraph 5.8.23 of EN-1 sets out that where a scheme would be located within, or partially within, Flood Zone 2 or Flood Zone 3, reasonable alternatives must be considered. In this case the Sequential Test should be undertaken. If following application of the Sequential Test, it is not possible for the project to be located in areas of lower flood risk the Exception Test can be applied, which provides a method of allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available. With regard to applying the Sequential Test, paragraph 5.8.23 sets out that consideration of alternative sites should take account of the policy on alternatives described in section 4.3 of EN-1. Further details of the sequential test are set out in section 8.7 below and in conclusion confirms the Proposed Development complies with the policy.
- Paragraph 5.10.32 of EN-1 sets out that where a development would be located within a National Park, the Broads or an AONB (now National Landscape), reasonable alternatives must be considered. The Proposed Development is not located within any of these designations, therefore no further consideration of alternatives in this regard is required.

8.1.38 Paragraph 4.3.24 of EN-1 states that the policy is clear that work should be undertaken on a proportionate basis and any alternative would need to be a reasonable alternative and so it would be expected to deliver the same capacity in the same timeframes. Indeed, there is acknowledgement that other sites may exist which potentially have lesser impacts than that proposed but that they may equally be required for further energy infrastructure in the future. This goes to the core of the approach to planning in England and Wales, which is that applications should be judged on their own merits.

- 8.1.39 In terms of legislative requirements on alternatives, Regulation 14(2)(d) of the EIA Regulations 2017 states that an ES should *"include a description of the reasonable alternatives studied by the applicant, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment."*
- 8.1.40 The Applicant has considered the reasonable alternatives that could realistically achieve the objectives of the Proposed Development. This is set out in greater detail within **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN0110020/APP/6.4]** and **Appendix 1: Site Selection Assessment** of this Planning Statement. These reports should also be read in conjunction with the **Statement of Need [EN0110020/APP/5.8]**.
- 8.1.41 The reports noted above conclude there were no alternative technologies or sites studied by the Applicant that could deliver the Design Principles of the Proposed Development.
- 8.1.42 Alternative types of low-carbon forms of electricity generation for utilising the proposed National Grid Long Lane 400kV Substation connection capacity have been considered in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN0110020/APP/6.4]**. However, notwithstanding this, it is not considered that the Order limits would be suitable for other forms of renewable generation at the same scale of the Proposed Development within the Order limits due to the following:
- Onshore wind development to generate comparable level of renewable energy would require in excess of 150 no. 4.5 megawatt (MW) turbines (approximately 200m tip height). The associated environmental impacts for a wind development of this scale would likely be greater than anticipated for a solar development;
  - Solar power is the most efficient renewable source as it is the least impactful; and
  - Tidal power, offshore wind, and hydroelectric storage were not considered possible due to the location of the proposed National Grid Long Lane 400kV Substation being approximately 96km from the coast.

### Part 4.4 of EN-1 and Part 4.3 of EN-3: Health

- 8.1.43 Paragraph 4.4.1 of EN-1 highlights that energy infrastructure has the potential to impact the health and well-being of the population. EN-1 goes on to state that where development has the potential to affect human beings, the Environmental Statement should assess those effects for each element of the project, identifying any adverse health impacts and measures to avoid, reduce, or compensate for the impacts as appropriate.
- 8.1.44 Paragraph 4.4.7 of EN-1 advises that the aspects of energy infrastructure which are *"most likely to have a significantly detrimental impact on health are subject to separate regulation (for example for air pollution) which will constitute effective mitigation of them, so that it is unlikely that health concerns will either by themselves constitute a reason to refuse consent or require specific mitigation"*. Paragraph 4.4.8 continues to advise that not all potential sources of health impacts will be mitigated in such a way and the *"Secretary of State may want to take account of health concerns when setting requirements relating to a range of impacts such as noise"*.

- 8.1.45 Health is assessed within a number of the Environmental Statement chapters including **ES Volume 2, Chapter 7: Landscape and Visual Assessment [EN0110020/APP/6.7]**, **ES Volume 2, Chapter 9: Ground Conditions and Land Quality [EN0110020/APP/6.9]**, **ES Volume 2, Chapter 11: Climate Change and Greenhouse Gases [EN0110020/APP/6.11]**, **ES Volume 2, Chapter 12: Air Quality [EN0110020/APP/6.12]**, and **ES Volume 2, Chapter 17: Cumulative Effects [EN0110020/APP/6.17]**.
- 8.1.46 In regard to Landscape and Visual health related impacts, **ES Volume 2, Chapter 7: Landscape and Visual Assessment [EN0110020/APP/6.7]** and **ES Volume 2, Chapter 17: Cumulative Effects [EN0110020/APP/6.17]**, addresses the potential impacts during construction and decommissioning on health and wellbeing of residents and users of the local Public Rights of Way. In summary, the assessment identified that there would be no significant adverse impacts during the construction and operation phases.
- 8.1.47 **ES Volume 2, Chapter 9: Ground Conditions and Land Quality [EN0110020/APP/6.9]** addresses potential impacts on health and wellbeing during the construction phase. It is noted within section 9.10 of the chapter that impacts on human health, both the construction workers and future site users, is considered to be of Minor or Negligible Significance.
- 8.1.48 In regard to climate change health related impacts, **ES Volume 2, Chapter 11: Climate Change and Greenhouse Gases [EN0110020/APP/6.11]**, addresses potential impacts during both the construction and decommissioning phases on health and wellbeing. Table 11-5 within **ES Volume 2, Chapter 11: Climate Change and Greenhouse Gases [EN0110020/APP/6.11]** sets out a summary of the likely significant environmental effects considered. In summary, the impact upon human health from the climate change assessment is deemed to be not significant.
- 8.1.49 **ES Volume 2, Chapter 12: Air Quality [EN0110020/APP/6.12]**, reports on potential impacts on human health in relation to dust and particulate matter emissions during both the construction and decommissioning phases, alongside traffic impacts during both the construction and decommissioning phases. The chapter concludes there is negligible risk of impact and therefore no significant residual effects are expected.
- 8.1.50 The above demonstrates that health impacts have been considered across the Proposed Development and, with the application of suitable mitigation measures, are not significant. It is therefore considered that, in terms of paragraph 4.4.7 there is no reason that health concerns associated with the Proposed Development present a reason for refusal. In accordance with paragraph 4.4.8 of EN-1, that there is no evidence to suggest that additional requirements relating to health need to be added to the DCO if the application for development consent be granted. It is therefore considered that the Proposed Development complies with the aims and intentions of the EN-1 policy requirements in regard to health.

### Part 4.6 of EN-1: Environmental and Biodiversity Net Gain

- 8.1.51 Paragraph 4.6.1 outlines that “*Environmental net gain is an approach to development that aims to leave the natural environment in a measurably better state than beforehand. Projects should therefore not only avoid, mitigate and compensate harms, following the mitigation hierarchy, but also consider whether there are opportunities for enhancements*”.

- 8.1.52 Paragraph 4.6.2 notes that Biodiversity Net Gain (BNG) is an essential component of environmental net gain, although pending becoming a mandatory requirement for NSIPs in England. However, projects within England should still consider and seek to incorporate improvements in natural capital, ecosystem services and the benefits they deliver when planning how to deliver BNG. This is further reiterated within paragraph 4.6.6 which states “*Energy NSIP proposals...seek opportunities to contribute to and enhance the natural environment by providing net gains for biodiversity, and the wider environment where possible*”.
- 8.1.53 One of the Design Principles, as set out in the **Design Approach Document [EN0110020/APP/5.7]**, requires the Proposed Development to protect and enhance the physical, natural and historic local environment. The **Outline Landscape and Ecology Management Plan [EN0110020/APP/5.13]** carries this commitment forward to detailed design stage and the delivery stage.
- 8.1.54 **ES Volume 3, Appendix 6.4: Baseline Biodiversity Net Gain Report [EN0110020/APP/6.20]** states that the Proposed Development will result in:
- Area Habitat Units = 28.35%
  - Hedgerow Units = 30%
  - Watercourse Units = 10.11%
- 8.1.55 The Applicant has committed in the **draft DCO [EN0110020/APP/3.1]** to figures equivalent to approximately two thirds of the figures in the BNG report. This is to allow for flexibility in the course of detailed design and is consistent with the approach taken on other recent solar DCOs and still secures BNG of well over 10%.
- 8.1.56 The summary above confirms that the Proposed Development is compliant with current policy requirements. As set out in Section 4.6 of EN-1, a mandatory legislative requirement for DCO projects to deliver a minimum 10% BNG is expected to come into force later in 2026.
- 8.1.57 Paragraph 4.6.15 of EN-1 advises that applications for development consent should be accompanied by a statement demonstrating how opportunities for delivering wider environmental net gains have been considered and, where appropriate, incorporated into the project's design (including any relevant operational aspects). Opportunities to deliver wider environmental gains are outlined in the **Outline Landscape and Ecology Management Plan [EN0110020/APP/5.13]** and **Design Approach Document [EN0110020/APP/5.7]**.

### Part 4.7 of EN-1 and 2.5 of EN-3: Criteria for “Good Design” for Energy Infrastructure

- 8.1.58 Paragraph 4.7.2 of EN-1 states, “*Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible*”.
- 8.1.59 Paragraph 4.7.5 of EN-1 states that design principles should be established from the outset of the project. Footnote 102 of EN-1 states that “*design principles should take into account any national guidance on infrastructure design, this could include for example the Design Principles for National Infrastructure published by*

*the National Infrastructure Commission, the National Design Guide and National Model Design Code, as well as any local design policies and standards”.*

- 8.1.60 Paragraph 4.7.6 of EN-1 states that applicants may have very limited choice in the physical appearance of some energy infrastructure. However, given the importance the Planning Act 2008 places on good design and sustainability, the SoS needs to ensure that energy infrastructure development is as attractive, durable, and adaptable as possible. The paragraph also states that applicants should seek to embed opportunities for nature-inclusive design within the design process. This then segways into paragraph 4.7.7 which requests that applicants demonstrate in their application how the design process was conducted and how the proposed design evolved.
- 8.1.61 Paragraph 4.7.10 of EN-1 states that “*given the importance which the Planning Act 2008 places on good design and sustainability, the Secretary of State needs to be satisfied that energy infrastructure developments are sustainable and, having regard to regulatory and other constraints, are as attractive, durable, and adaptable (including taking account of natural hazards such as flooding) as they can be*”.
- 8.1.62 Paragraph 2.5.2 of EN-3 recognises that proposals for energy infrastructure should demonstrate good design that particularly is in respect of “*...landscape and visual amenity, opportunities for co-existence/co-location with other marine and terrestrial uses, and in the design of the project to mitigate impacts such as noise and effects on ecology and heritage*”.
- 8.1.63 Regarding solar energy projects specifically, paragraph 2.10.52 of EN-3 notes that applicants should consider “*...several factors when considering the design and layout of sites, including proximity to available grid capacity to accommodate the scale of generation, orientation, topography, previous land–use, and ability to mitigate environmental impacts and flood risk*”.
- 8.1.64 Further detail is set out in Section 5 of this Planning Statement and in the **Design Approach Document [EN0110020/APP/5.7]** which set out in detail the Applicant’s actions which demonstrate compliance with the design related policy within both EN-1 and EN-3.

### Part 4.11 of EN-1 and 2.10 of EN-3: Network Connection

- 8.1.65 Paragraph 4.11.1 of EN-1 notes that the grid connection point of a generating station to the electricity network is an important consideration for applicants.
- 8.1.66 Paragraph 2.10.13 of EN-3 notes that applicants should consider issues relating to network connection which are set out within Section 4.11 of EN-1 and within EN-5. In particular, and where appropriate, applicants should proceed in a manner consistent with the regulatory regime for offshore transmission networks.
- 8.1.67 The **Grid Connection Statement [EN0110020/APP/7.1]** which has been submitted with the DCO Application, confirms that the Applicant has secured a grid connection to the proposed National Grid Long Lane 400kV Substation which would allow for the import of over 100MW of electricity. Paragraph 4.11.4 of EN-1 states that “*transmission network infrastructure, and related network reinforcement and upgrade works, associated with nationally significant low carbon infrastructure is considered as CNP Infrastructure*”.
- 8.1.68 Paragraph 4.11.7 of EN-1 encourages applications for generating stations and related infrastructure to be submitted in tandem or prepared in an integrated way.

Paragraph 4.11.8 advises that where the situation arises that applications cannot be coordinated the Applicant should include information on the other elements and confirm there are no obvious reasons why other elements may be refused.

- 8.1.69 National Grid has submitted an application for the proposed National Grid Long Lane 400kV Substation, as part of its Great Grid Upgrade to take power generated by offshore wind to where it is needed via reference. RB2025/1468 on 11<sup>th</sup> November 2025. On this basis, the Proposed Development maintains sufficient flexibility to allow for any changes in the design of the Substation up to and throughout the consideration of National Grid's application.
- 8.1.70 Although the NPS is not the primary policy tool for determining the proposed Long Lane 400kV Substation application under the Town and Country Planning Act (1990), paragraph 1.2.1 of EN-1 states that the NPS may be a material consideration and substantial weight may be attributed to the CNP policy during decision making.
- 8.1.71 Paragraph 4.11.12 advises that the Secretary of State "*should be satisfied that appropriate network connection arrangements are/will be in place for a given project regardless of whether one or multiple (linked) applications are submitted*". The Applicant has a contractual grid connection offer at the proposed Long Lane 400kV Substation which, although it currently does not have consent, is at a mature stage of development with an application having been submitted to Rotherham Metropolitan Borough Council at the end of 2025. The Applicant considers that the principle of the proposed Long Lane 400kV Substation development is strongly supported in and pending outcomes of other relevant assessment works considers there to be no obvious impediments to the grant of planning consent.
- 8.1.72 In the event that consent is not granted for the National Grid Long Lane 400kV Substation, National Grid has confirmed that there is capacity to connect into the existing Brinsworth substation.

### Part 4.12 of EN-1: Pollution Control and other Environmental Regulatory Regimes

- 8.1.73 Paragraph 4.12.1 of EN-1 states that "*discharges or emissions from a proposed project, and which lead to other direct or indirect impacts on terrestrial, freshwater, marine, onshore, and offshore environments, or which include noise and vibration may be subject to separate regulation under the pollution control framework or other consenting and licensing regimes...*".
- 8.1.74 Paragraph 4.12.9 of EN-1 advises that the Secretary of State should focus on whether the development itself is an acceptable use of the land and on the impact of that use rather than the control of processes, emissions, and discharges themselves. This continues into paragraph 4.12.10, which notes that the Secretary of State "*should work on the assumption that the relevant pollution control regime and other environmental regulatory regimes, including those on land drainage, water abstraction and biodiversity, will be properly applied and enforced by the relevant regulator. The Secretary of State should act to complement but not seek to duplicate those regulatory regimes, but without prejudice to the Secretary of State's duty to 'secure' compliance with the relevant regulatory requirements*".
- 8.1.75 The DCO Application is accompanied by a document setting out the **Consents and Agreements Position Statement [EN0110020/APP/5.3]**. This document

outlines the other environmental consents, permits and licences required to facilitate the Proposed Development. The Applicant acknowledges the preference set out in paragraph 4.12.8 of EN-1 for applicants to submit applications for other necessary consents at the same time as seeking development consent from the SoS; however, the level of detail required to obtain such permits and licenses is not available at this stage. The details of other consents and licenses document sets out the status of discussions with relevant regulators with, notably, the vast majority of engagement and subsequent applications expected to be undertaken by the relevant contractor at detailed design stage when the relevant information becomes available, should a DCO consent be granted.

- 8.1.76 The Proposed Development's construction phase environmental impacts would be managed through the implementation of a Construction Environmental Management Plan (CEMP). An **Outline Construction Environmental Management Plan [EN0110020/APP/5.9]**, submitted with the DCO Application, sets out a series of measures, based on best-practice guidance, to control the environmental effects of construction of the Proposed Development. The measures included in the outline document will form an important part of efforts to control construction phase impacts
- 8.1.77 Ongoing impacts arising from the operational phase of the Proposed Development are assessed to be to be few and minor. However, any arising impacts will be controlled through a detailed Operational Environmental Management Plan that would be prepared in accordance with the **Outline Operational Environmental Management Plan [EN0110020/APP/5.10]**, should DCO consent be granted. Similarly, a Decommissioning Environmental Management Plan prepared in accordance with **Outline Decommissioning Environmental Management Plan [EN0110020/APP/5.11]** would control environmental effects as identified in the ES during the decommissioning of the Proposed Development.

### Part 4.13 of EN-1: Safety

- 8.1.78 Paragraph 4.13.1 of EN-1 explains that the Health and Safety Executive (HSE) "*...the independent regulator for workplace health and safety and is responsible for enforcing a range of health and safety legislation, some of which is relevant to the construction, operation and decommissioning of energy infrastructure*".
- 8.1.79 Paragraph 4.13.3 confirms that some energy infrastructure will be subject to the Control of Major Accident Hazards (COMAH) Regulations 2015. As per Section 3 of these Regulations, Solar and BESS development is not applicable to the regime and therefore no further response is required. As the Proposed Development is not subject of the COMAH Regulations, paragraphs 4.13.7 and 4.13.8 of EN-1 are not engaged.
- 8.1.80 With regards to other safety elements, the DCO application is accompanied by an **Outline Battery Safety Management Plan [EN0110020/APP/5.15]** which demonstrates the fire safety provisions for the BESS including measures to reduce fire risk and fire protection measures.

### Part 4.14 of EN-1: Hazardous Substances

- 8.1.81 Paragraph 4.14.1, EN-1 states that "*establishments wishing to hold stocks of certain hazardous substances above a threshold need Hazardous Substances Consent*".

- 8.1.82 There is no requirement for storage or use of hazardous substances at or above Controlled Quantities for the Proposed Development, and Hazardous Substances Consent is not required. Pollution prevention and control measures with management prescriptions set out in the **Outline Construction Environmental Management Plan [EN0110020/APP/5.9]**, which is secured by requirement in the **Draft DCO [EN0110020/APP/3.1]**.

### Part 4.15 of EN-1: Common Law Nuisance and Statutory Nuisance

- 8.1.83 It is stated at paragraph 4.15.5 that at the application stage for an energy Nationally Significant Infrastructure Project, *“possible sources of nuisance under section 79(1) of the EPA 1990 and how they may be mitigated or limited should be identified by the applicant so that appropriate requirements can be included in any subsequent order granting development consent”*. This is then followed on into paragraph 4.15.6 which notes that the Secretary of State should consider possible sources of nuisance under Section 79(1) of the Environmental Protection Act 1990 and how they could be mitigated or limited so that appropriate requirements can be included in any subsequent DCO grant.
- 8.1.84 Applicant has prepared and submitted a **Statutory Nuisance Statement [EN0110020/APP/5.2]** as is required under APFP Regulation 5(2)(f) and paragraph 4.15.5 of EN-1. Measures including obtaining section 61 consent for control of noise on construction sites, which would include agreed construction noise limits for nearby noise-sensitive receptors, are set out in the **Outline Construction Environmental Management Plan [EN0110020/APP/5.9]** and **Outline Decommissioning Environmental Management Plan [EN0110020/APP/5.11]** and are secured through requirements 4 and 15, respectively, in the **Draft DCO [EN0110020/APP/3.1]**.
- 8.1.85 The Applicant, at Article 10 of the **Draft DCO [EN0110020/APP/3.1]**, deals with defence to proceedings in respect of statutory nuisance and provides that no person is able to bring statutory nuisance proceedings under the Environmental Protection Act 1990 in respect of noise, if the noise is created in the course of carrying out construction, maintenance or decommissioning of the authorised development and for which notice has been given under section 60 or consent obtained under section 61(9) of the Control of Pollution Act 1974 or which cannot be reasonably avoided as a consequence of the authorised development. This approach is precedented in all made solar DCOs to date, including the Gate Burton Energy Park Order 2024, the Mallard Pass Solar Farm Order 2024, the Sunnica Energy Farm Order 2024, West Burton Solar Project Order 2025, Heckington Fen Solar Park Order 2025 and Springwell Solar Farm Order 2026.

### Part 4.16 of EN-1 and Part 2.10 of EN-3: Security Considerations

- 8.1.86 It is confirmed in paragraph 4.16.1 of EN-1 that national security considerations apply across all national infrastructure sectors. Paragraph 4.16.2 of EN-1 later states that *“DESNZ works closely with government security agencies including the National Protective Security Authority (NPSA) and the National Cyber Security Centre (NCSC) to provide advice to the most critical infrastructure assets on terrorism and other national security threats, as well as on risk mitigation”*.

- 8.1.87 Paragraph 4.16.4 of EN-1 states that Government policy is to ensure that proportionate protective security measures are designed into new infrastructure projects at an early stage. Paragraph 4.16.6 states that where "*national security implications have been identified, the applicant should consult with relevant security experts from NPSA, ONR (for civil nuclear) and/or DESNZ to ensure security measures have been adequately considered in the design process and that adequate consideration has been given to the management of security risks*".
- 8.1.88 Paragraph 2.10.39 of EN-3 notes that applicants "*should assess the visual impact of these security measures, as well as the impacts on local residents, including for example issues relating to intrusion from CCTV and light pollution in the vicinity of the site*".
- 8.1.89 The Applicant has not identified any relevant considerations relating to national security in relation to the Proposed Development. Security requirements have been embedded into the design of the proposals from the outset and are considered proportionate.
- 8.1.90 Paragraph 4.16.8 states that if "*If NPSA, ONR (for civil nuclear) and/or DESNZ are satisfied that security issues have been adequately addressed in the project when the application is submitted to the Secretary of State, it will provide confirmation of this to the Secretary of State. The Secretary of State should not need to give any further consideration to the details of the security measures in its examination*".
- 8.1.91 The Applicant considers that no further consideration is therefore required on security matters.

### Part 5.5 of EN-1: Civil and Military Aviation and Defence Interests

- 8.1.92 Paragraph 5.5.7 of EN-1 states that it is "*essential that new energy infrastructure is developed collaboratively alongside aerodromes, aircraft, manned and unmanned air systems and airspace so that safety, operations and capabilities are not adversely affected by new energy infrastructure. Likewise, it is essential that aerodromes, aircraft, air systems and airspace operators work collaboratively with energy infrastructure developers essential for net zero*".
- 8.1.93 Paragraph 5.5.11 discusses safeguarding of certain civil aerodromes and aviation sites in order to ensure that their safety and operation are not compromised by new development. Paragraph 5.5.12 advises a similar safeguarding applies to all military aerodromes, defence surveillance sites, and other defence assets.
- 8.1.94 Paragraph 5.5.36 states that "*it is important that new energy infrastructure does not unacceptably impede or compromise the safe and effective use of any defence assets or operations*".
- 8.1.95 Paragraph 5.5.63 concludes that provided the SoS is "*satisfied that the impacts of proposed energy developments do not present risks to national security and physical safety, and where they do, provided that the Secretary of State is satisfied that appropriate mitigation can be achieved, or appropriate requirements can be attached to any Development Consent Order to secure those mitigations, consent may be granted*".
- 8.1.96 The Applicant confirms that the Proposed Development does not fall within a Ministry of Defence safeguarding zone. The Applicant is also not aware of any matter that would result in the Proposed Development presenting a safety or

security related impact to the MOD and its assets. The Applicant considers the Proposed Development is compliant with requirements of paragraph 5.5.63 of EN-1.

- 8.1.97 The following sections set out the generic impacts of the Proposed Development upon technical topics set out in NPS EN-1, EN-3 and EN-5.

## 8.2 Biodiversity and Nature Conservation

- 8.2.1 This section of the Planning Statement reviews the Proposed Development in the context of the planning policy for biodiversity and nature conservation. This section should be read in conjunction with **ES Volume 2, Chapter 6: Biodiversity and Nature Conservation [EN0110020/APP/6.6]** and the **Policy Compliance Document [EN0110020/APP/5.5]**.
- 8.2.2 Paragraph 5.4.4 of EN-1 notes that the highest level of biodiversity protection is afforded to sites identified through international conventions and that the Habitats Regulations identifies sites for which a HRA will assess the implications. Paragraph 5.4.51 of EN-1 later confirms the SoS must consider whether a project is likely to have a significant effect on a protected site which is part of the National Site Network, or any site to which the same protection is applied as a matter of policy, either alone or in combination with other plans and projects.
- 8.2.3 Paragraph 5.4.13 of EN-1 refers to sites of regional and local biodiversity and geological interests, which include Local Wildlife Sites, which are of substantive nature conservation value and make an important contribution to ecological networks and nature's recovery. Paragraph 5.4.54 of EN-1 states that the Secretary of State should give due consideration to regional or local designations, however given the need for new nationally significant infrastructure, these designations should not be used in themselves to refuse development consent.
- 8.2.4 It is noted in paragraph 5.4.22 of EN-1 that "*the design of energy NSIP proposals will need to consider the movement of mobile/migratory species such as birds, fish and marine and terrestrial mammals and their potential to interact with infrastructure*".
- 8.2.5 Paragraph 5.4.40 of EN-1 notes that the Secretary of State should have regard to the aims and goals set out within the Environmental Improvement Plan and any relevant measures and targets set by the Environment Act or elsewhere. This is reiterated within paragraph 2.3.7 of EN-3.
- 8.2.6 It is discussed within paragraph 2.5.2 of EN-3 that "*renewable energy infrastructure should demonstrate good design...to mitigate impacts such as noise and effects on ecology and heritage*". From the outset of the site selection process for the Proposed Development, the Applicant has sought to embed good design into its overarching approach. One of the key considerations at site selection stage, as set out in the Site Selection Assessment at Appendix 1 of this document, was to avoid land which contained sensitive ecological and biodiversity related statutory designations and the Proposed Development was successful in this regard, with no international or national statutory designations being impacted by the Proposed Development.
- 8.2.7 NPPF Section 15: 'Conserving and enhancing the natural environment' paragraph 187 states that planning decisions should contribute to and enhance the natural and local environment, and paragraph 192 seeks to encourage opportunities to incorporate biodiversity improvements, particularly where this can secure measurable net gains for biodiversity. Table 4 and Table 5 of the **Policy**

**Compliance Document [EN0110020/APP/5.5]** addresses NPPF policies, including the draft policies, with regard to biodiversity.

- 8.2.8 The biodiversity and nature conservation impacts of the Proposed Development are considered within **ES Volume 2, Chapter 6: Biodiversity and Nature Conservation [EN0110020/APP/6.6]**. The chapter sets out all the designated sites (international, national, and local) of both ecological and geological conservation importance; protected species; and habitats and other species identified as being of principal importance for the conservation of biodiversity within the Study Area for biodiversity and nature conservation.
- 8.2.9 As set out within the **Design Approach Document [EN0110020/APP/5.7]**, a number of the project Design principles have both informed and guided the design development of the Proposed Development. The principles of relevance to biodiversity include:
- Support local ecology and enhance biodiversity, enriching ecosystems where possible; and
  - Consider how people engage with their local environment and retain these patterns.
- 8.2.10 **ES Volume 2, Chapter 6: Biodiversity and Nature Conservation [EN0110020/APP/6.6]** specifies the surveys which have been conducted and completed to date for the Proposed Development. A description of the baseline for these surveys is set out within section 6.5 of the relevant topic chapter.
- 8.2.11 The Proposed Development's approach to addressing impacts on biodiversity is in line with the requirements of paragraph 5.4.43 and 5.4.44 of NPS EN-1, that first seeks to avoid potential impacts, then minimise them, and then take on-site measures to rehabilitate or restore biodiversity, before compensating for residual, unavoidable impacts. In terms of potential impacts on both habitats and species within the Order Limits and surrounding area, **ES Volume 2, Chapter 6: Biodiversity and Nature Conservation [EN0110020/APP/6.6]** summarises the following which shows that impacts on all species are not significant during construction and operation and in some cases beneficial during operation due to the significant biodiversity improvements proposed:
- Bats – the overall impact of the Proposed Development on bats is considered not significant during the construction phase but as a result of the proposed habitat enhancement for the operational phase it results in significant benefits;
  - Great Crested Newts – the overall impact of the Proposed Development on Great Crested Newts is not significant both during the construction and operational phases;
  - Water Vole - the overall impact of the Proposed Development on Water Voles is not significant both during the construction and operational phases;
  - Otter - the overall impact on Otters as a result of the Proposed Development is not significant during the construction phase but as a result of the proposed habitat enhancement and reduction to agricultural aquatic pollutants for the operational phase it results in significant benefits;
  - Reptiles – the overall impact on reptiles as a result of the Proposed Development is not significant during the construction phase but as a

result of the proposed habitat enhancement for the operational phase it results in significant benefits;

- Badger – the overall impact on badgers as a result of the Proposed Development is not significant during the construction phase but as a result of the proposed habitat enhancement for the operational phase it results in significant benefits;
- White Clawed Crayfish - the overall impact on White Clawed Crayfish as a result of the Proposed Development is not significant during both the construction and operational phases;
- Migratory Fish - the overall impact of the Proposed Development on Migratory Fish is not significant both during the construction and operational phases; and
- Brown Hare - the overall impact on Brown Hares as a result of the Proposed Development is not significant during the construction phase but as a result of the proposed habitat enhancement for the operational phase it results in significant benefits.

- 8.2.12 The proposed embedded mitigation is described in section 6.6 of **ES Volume 2, Chapter 6: Biodiversity and Nature Conservation [EN0110020/APP/6.6]**.
- 8.2.13 It is noted that there are a number of Local Wildlife Sites within the Surrounding area, and Brampton Common Local Wildlife Site is located within the Order Limits of the Proposed Development. The Proposed Development aims to secure the long-term protection, enhancement, and favourable management of Brampton Common Local Wildlife Site, introducing solar panels and associated features whilst safeguarding and enhancing its species rich hedgerows and breeding skylark population and delivering high quality habitat that contributes to biodiversity net gain. This is set out in further detail within the **Outline Landscape and Ecology Management Plan [EN0110020/APP/5.13]**, including the strategy to ensure long-term benefits for this wildlife site are delivered.
- 8.2.14 At a site selection stage, the decision was taken to include part of Brampton Common LWS within the Order Limits due to it currently not being in a favourable condition and that it was not being managed to benefit the features it was designated for, in particular that skylark populations were well below the average seen within the Site as a whole. The inclusion of part of the LWS within the Order Limits enables improvements to be delivered alongside making the most efficient use of the remaining land within the LWS for renewable energy provision.
- 8.2.15 Some of the benefits to Brampton Common LWS are summarised in Table 6-12 of **ES Volume 2, Chapter 6: Biodiversity and Nature Conservation [EN0110020/APP/6.6]** and in section 6 of the **Outline Landscape and Ecology Management Plan [EN0110020/APP/5.13]** which include but are not limited to:
- New hedgerows will be planted across the LWS within the Order Limits. Hedgerow cutting will be reduced on a rotational basis to provide dense belts of shelter, forage and nesting for birds and other protected species. The quality of hedgerows within the designation will be improved to meet the criteria of native species rich hedgerows for which the site is designated.
  - Improved and managed habitats for at least 30 years including improvements for designated features within, and adjacent to the Local Wildlife Site.

- New grassland will be created across the Local Wildlife Site within the Order Limits, based on the species list provided but agreed with the host authorities. Grassland will be cut once a year, in late summer (July – August) after nesting. The cut grass will be removed to reduce fertility. It is recommended to maintain some bare patches approximately (5-10%) and variation in height.
- Wetland habitat will be reintroduced across the Local Wildlife Site within the Order Limits, to benefit wading birds, by introducing scrapes and wet grassland species. This wet grassland will where practical be grazed in late summer or autumn to maintain a short, open sward and maintain uneven ground structure, with hoof marks and scrapes.
- Maintained and improved community benefits by increasing access for the local population, particularly for school age children and vulnerable adults, to include upgraded and maintained access points and defined accessible footpath routes.

8.2.16 In conclusion, the strategy to ensure long-term benefits for the Brampton Common Local Wildlife Site, as set out within the **Outline Landscape and Ecology Management Plan [EN0110020/APP/5.13]** will be secured as part of the Landscape and Ecology Management Plan to be prepared under Requirement 9 of the **Draft DCO [EN0110020/APP/3.1]**. The Applicant commits to the following:

- Long-term management of the proposed and existing habitats supporting skylark and wading birds will extend across the LWS within the Order Limits.
- Long-term operational monitoring across the LWS within the Order Limits will be undertaken annually during the peak breeding time for five years, to better understand habitat improvements and biodiversity.

8.2.17 Paragraph 5.4.33 of NPS EN-1 refers to ancient woodlands and veteran trees. **ES Volume 2, Chapter 6: Biodiversity and Nature Conservation [EN0110020/APP/6.6]** confirms that there are no ancient woodlands contained within the Order Limits. However, it can be confirmed that there are four ancient woodland blocks adjacent to the Site or within 50m of it.

8.2.18 As a result of the masterplanning of the Proposed Development, alongside the proposed mitigation measures, the Proposed Development would not result in any loss or deterioration of any ancient woodlands or veteran trees. Therefore, demonstrating that the Proposed Development is in accordance with EN-1 paragraph 5.4.55.

### Biodiversity Net Gain (BNG)

8.2.19 Paragraph 4.6.1 of EN-1 explains that "*environmental net gain is an approach to development that aims to leave the natural environment in a measurably better state than beforehand. Projects should therefore not only avoid, mitigate and compensate harms, following the mitigation hierarchy, but also consider whether there are opportunities for enhancements*".

8.2.20 Paragraph 4.6.6 of EN-1 explains that energy nationally significant infrastructure project proposals should look for opportunities to contribute and enhance the national environment by providing net gains for biodiversity where possible. Paragraph 4.6.7 of EN-1 encourages applicants to use the most current version of

the DEFRA biodiversity metric to calculate their biodiversity baseline and inform their biodiversity net gain outcomes and to present this data as part of their application.

- 8.2.21 Paragraph 4.6.10 of EN-1 adds that BNG should be "*applied after compliance with the mitigation hierarchy and does not change or replace existing environmental obligations*". Paragraph 2.10.81 of EN-3 notes that "*Solar farms have the potential to increase the biodiversity value of a site, especially if the land was previously intensively managed. In some instances, this can result in significant benefits and enhancements beyond biodiversity net gain, which result in wider environmental gains which is encouraged*".
- 8.2.22 Paragraph 5.4.47 of EN-1 discusses opportunities for building in beneficial biodiversity or geological features as part of good design. Paragraph 5.4.21 of EN-1 adds that this can help towards delivering biodiversity net gain, and that wider ecosystem services and benefits of natural capital should also be considered when designing enhancement measures.
- 8.2.23 A mandatory legislative requirement for DCO projects to deliver a minimum 10% BNG is expected to come into force for applications made from 2 November 2026 but as shown in paragraph 8.1.53 of this Planning Statement, the Proposed Development is in any event expected to deliver in excess of this minimum 10% as discussed above in paragraph 8.1.54.
- 8.2.24 The **Design Approach Document [EN0110020/APP/5.7]** sets out the design process which resulted in the layout of the Proposed Development being designed to maximise the opportunities around enhancing and conserving biodiversity and geological conservation interests. A key aspect of this design process has been around identifying and retaining landscape features which are beneficial to the layout of the Proposed Development.

### Mitigation and Management

- 8.2.25 EN-1 paragraph 5.4.36 requires applicants to include appropriate avoidance, mitigation, compensation and enhancement measures as an integral part of the proposed developments. EN-1 paragraph 5.4.37 states that applicants should produce and implement a Biodiversity Management Strategy as part of their development proposals and paragraph 5.4.45 of EN-1 indicates that appropriate requirements should be attached to any consent to ensure any mitigation measures are delivered and maintained. Paragraph 2.10.82 of EN-3 states that applicants should consider enhancement, management and monitoring of biodiversity.
- 8.2.26 To ensure the beneficial effects of the newly created habitats are fully realised an **Outline Landscape and Ecology Management Plan [EN0110020/APP/5.13]** forms part of the control documents submitted alongside this DCO Application. The **Outline Landscape and Ecology Management Plan [EN0110020/APP/5.13]** sets the framework for the LEMP which will be required to be submitted and approved by the relevant local planning authorities and will set out how the newly created and retained habitats onsite will be managed throughout the operational phase of the Proposed Development. An **Outline Landscape and Ecology Management Plan [EN0110020/APP/5.13]** is included as part of the DCO Application, which the Landscape and Ecology Management Plan will be substantially in accordance with.
- 8.2.27 The DCO Application is also accompanied by an **Outline Construction Environmental Management Plan [EN0110020/APP/5.9]** and **Outline**

**Decommissioning Environmental Management Plan [EN0110020/APP/5.11].**

These include mitigation measures which are intended to limit adverse effects both during the construction and decommissioning phases.

- 8.2.28 The production of the CEMP and DEMP is secured via requirements 4 and 15 of the **draft DCO [EN0110020/APP/]** and they will need to be approved by the relevant local planning authority prior the relevant stage of either construction or decommissioning and will be substantially in accordance with the outline versions. Some examples of the types of measures included in the **Outline Construction Environmental Management Plan [EN0110020/APP/5.9]** and **Outline Decommissioning Environmental Management Plan [EN0110020/APP/5.11]** include the management of accesses, and the control of noise and lighting.
- 8.2.29 In respect of EN-3 paragraph 2.10.74, lighting impacts on local ecology have been considered. During construction, operation and decommissioning phases, no part of the Proposed Development would be continuously lit, and any lighting would be directional to minimise outward light spill onto vegetation which may be used by birds. Therefore, lighting is not anticipated to impact upon retained habitats (such as woodland and hedgerows) and any assessed sensitive receptors (such as bats and birds) using such habitats.

### Summary

- 8.2.30 From the start of development of the Proposed Development, the Applicant has sought to embed biodiversity and nature conservation considerations into the design process. This is evident at the site selection stage where the Applicant purposefully sought land which did not include any highly sensitive ecological/biodiversity related statutory designations.
- 8.2.31 The Proposed Development does not result in any significant adverse effects on relevant habitats and species and in some cases results in an improvement. Whilst the Order Limits include the Brampton Common Local Wildlife Site, the Proposed Development results in an overall beneficial impact in terms of this local designation, given its currently degraded character, which will be secured through the **Outline Landscape and Ecology Management Plan [EN0110020/APP/5.13]**. There are no adverse impacts on ancient woodland and no loss of or impact to veteran trees.
- 8.2.32 As explained in the **Statement of Need [EN0110020/APP/5.8]** and summarised above in Section 4, the Proposed Development has the potential to deliver significant amounts of low-carbon electricity and make a material contribution to help meet the UK's commitments to decrease carbon emissions and reach net zero by 2050. Failure to deliver infrastructure projects that deliver low carbon electricity, damage the UK's prospects of meeting its climate change targets and will result in significant adverse impacts to biodiversity.
- 8.2.33 For the reasons set out above, it is therefore considered that the Proposed Development has both addressed and been compliant with the specific EN-1 tests as set out in paragraph 5.4.42 and 5.4.43. For more information as to how the Proposed Development has been compliant with the aforementioned tests, please refer to Table 1 of the **Policy Compliance Document [EN0110020/APP/5.5]**.

## 8.3 Landscape and Visual Impact Assessment

- 8.3.1 This section of the Planning Statement reviews the Proposed Development within the context of the relevant planning policies relating to landscape and visual

impacts. This section should be read in conjunction with the **Policy Compliance Document [EN0110020/APP/5.5]**.

- 8.3.2 Paragraph 2.10.89 of EN-3 refers to the requirement for Landscape and Visual Impact Assessments (LVIA). Stating that “*Photomontage visualisations may be required to demonstrate the effects of a proposed solar farm, on sensitive or valued landscapes, particularly designated landscapes, the setting of heritage assets and any nearby residential areas or viewpoints*”.
- 8.3.3 An LVIA of the construction, operation and decommissioning phases of the Proposed Development is included at within **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment [EN0110020/APP/6.9]**.
- 8.3.4 Paragraph 187 of the NPPF states that planning policies and decisions should contribute to and enhance the natural and local environment, including by protecting and enhancing valued landscapes, recognising the intrinsic character and beauty of the countryside.
- 8.3.5 The **Design Approach Document [EN0110020/APP/5.7]** and **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN0110020/APP/6.4]** discuss the design process and the decisions that were made, including the project design principles identified to frame the design decisions, in order to minimise landscape and visual impacts and consider the LVIA assessment within **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment [EN0110020/APP/6.9]**.
- 8.3.6 Considerable effort by the Applicant has been taken to minimise remaining landscape and visual effects from the Proposed Development, including through the implementation of Biodiversity Enhancement Areas, new hedgerow, infilling of existing hedgerows, new wildflower areas and coastal grazing marsh. This demonstrates the Applicants response to paragraphs 2.10.92 of EN-3 and section 5.10 of EN-1.
- 8.3.7 Section 2.9 of EN-5 refers to landscape and visual impacts where it is encouraged to reasonably mitigate possible impacts of transmission infrastructure on visual and landscape amenity (such as effects resulting from cabling and substations). The Proposed Development addresses this via principally installing cabling underground and through screening of transmission infrastructure. Table 3 at **Policy Compliance Document [EN0110020/APP/5.5]** includes a response to EN-5 policies.
- 8.3.8 Paragraph 2.10.92 of EN-3 notes that “*The applicant should consider as part of the design, layout, construction, and future maintenance plans how to protect and retain, wherever possible, the growth of vegetation on site boundaries, as well as the growth of existing hedges, established vegetation, including mature trees within boundaries*”. This flows into paragraph 2.10.93 of EN-3 stating that “*the impact of the proposed development on established trees and hedges should be informed by a tree survey and arboricultural/hedge assessment as appropriate*”.

### Landscape Character

- 8.3.9 From the start of development of the Proposed Development, the Applicant has sought to embed landscape and visual considerations into the design process. This is evident at the site selection stage where the Applicant purposefully sought land which did not include any highly sensitive landscape related statutory designations.
- 8.3.10 EN-1 paragraph 3.1.2 states “*it will not be possible to develop the necessary amounts of such infrastructure without some significant residual adverse impacts*”.

When specifically focusing upon landscape and visual effects, paragraph 5.10.5 of EN-1 specifically states that “*Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation*”.

- 8.3.11 EN-1 paragraph 4.2.2 notes that “*energy security and net zero ambitions will only be delivered if we can enable the development of new low carbon sources of energy at speed and scale*”. Complementary to this, EN-1 paragraph 5.10.26 recognises that any reduction in the scale of a project, to mitigate adverse effects, may result in a significant operational constraint or reduction in function, such that the SoS should balance the loss of function, with any potential reduction in adverse landscape and / or visual effects.
- 8.3.12 EN-1 paragraph 5.10.14 further states that the Secretary of State should judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the project.
- 8.3.13 **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment [EN0110020/APP/6.7]** was informed by a series of Zone of Theoretical Visibility (ZTV) figures (see **ES Volume 3, Figures 7.4 – 7.10 [EN0110020/APP/6.19]**). A study area of 3km radius from the Order Limits was established (**ES Volume 3, Figure 7.1: LVIA Study Area and Order Limits [EN0110020/APP/6.19]**), with paragraph 7.4.9 of **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment [EN0110020/APP/6.7]** ensuring that this is proportionate to cover the Likely Significant Effects on landscape and visual receptors.
- 8.3.14 **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment [EN0110020/APP/6.7]** sets out the relevant landscape character areas within the study area associated with the Proposed Development and these have been considered within the assessment. Given the Proposed Development extends across the relevant landscape character areas there is the potential for a large scale of change to the character of the landscape.
- 8.3.15 In line with paragraphs 2.10.92 and 2.10.93 of EN-3, the **Outline Construction Environmental Management Plan [EN0110020/APP/5.9]** details that construction should be undertaken in a sensitive manner regarding the existing landscape fabric within the Order Limits. It details where existing hedgerows, trees and woodland would be retained and explains the proposed protection measures to be implemented during the construction phase, such as the inclusion of habitat protection buffers.
- 8.3.16 During the construction, operation and maintenance and decommissioning phases, effects on landscape character are assessed within **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment [EN0110020/APP/6.7]**. During the construction phase, the effect is assessed as being significant due to a moderate to major adverse effect on the existing landscape character areas of LCA 8: Central Rotherham Coalfield Farmland and LCA A1: Conisbrough and Denaby Coalfield Farmlands. From a visual perspective, there are anticipated major to moderate significant effects.

### Visual Impact

- 8.3.17 It is referred to in EN-1 paragraph 5.10.35 that the scale of energy projects means they will often be visible across a wide area. Paragraph 2.10.89 of EN-3 states that visualisations may be required to demonstrate the effects of a proposed solar

farm on the setting of heritage assets and any nearby residential areas of viewpoints.

- 8.3.18 Paragraphs 5.10.13 and 5.10.14 of EN-1 state that all proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites, and a judgement is required on whether effects upon sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the project.
- 8.3.19 **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment [EN0110020/APP/6.7]** identifies visual impact receptor groups and contains an assessment of visual effects, the receptor groups include:
- Residents (within settlements and at isolated farmsteads / dwellings);
  - Users of Public Rights of Way and National Trails;
  - Users of local road network; and
  - Visitors to recreational attractions / heritage assets.
- 8.3.20 The majority of existing views are influenced to varying degrees by the extent of other infrastructure and residential settlements across the Order Limits and study area, such that there is already a high influence of energy infrastructure in the composition of views.
- 8.3.21 The receptors of higher visual sensitivity are typically associated with promoted routes and have largely open views unspoiled by any detractors. The receptors of lower visual sensitivity are typically associated with major roads, such as the M1 and M18.

### Proposed Mitigation

- 8.3.22 Paragraphs 2.10.85 - 2.10.93 of EN-3 note that part 5.10 of EN-1 is where the generic impacts relating to Landscape and Visual are covered. However, paragraph 2.10.90 confirms the following:
- “Applicants should follow the criteria for good design set out in Section 4.7 of EN-1 when developing projects and will be expected to direct considerable effort towards minimising the landscape and visual impact of solar PV arrays especially within nationally designated landscapes”.*
- 8.3.23 Specific landscape and visual matters are set out under 'Impacts' in paragraphs 2.10.85 - 2.10.93 of EN-3. Paragraph 2.10.86 specifically discusses that *“Solar farms are likely to be in low lying areas of good exposure and as such may have a wider zone of visual influence than other types of onshore energy infrastructure”.*
- 8.3.24 During the site selection process, the Applicant sought to avoid landscape and visual impacts by siting the Proposed Development in the areas of lower impact. Within the initial search area of 12km, the Applicant assessed the topography of the landscape and views from potential visual sensitive receptors. This led to an assessment of the key viewpoints from settlement edges and Public Rights of Way to indicate the character of views across the search area, to seek to avoid significant adverse impacts in terms of landscape and visual aspects by removing parcels of land within the search area that were considered to have the greatest landscape and visual impacts. Nevertheless, it has not been possible to avoid adverse impacts entirely, as recognised by paragraph 3.1.2 of NPS EN1.
- 8.3.25 In conjunction with other site selection criteria, as set out in the **Appendix 1: Site Selection Assessment** of this Planning Statement, land closest to the national

grid substation was selected as the preferred Order Limits, and this was beneficial in terms of avoiding land closer to the Peak District National Park (located approximately 13km to the west of the substation) where the landscape and visual impacts would have been worse.

8.3.26 It is recognised that schemes of this type and scale will often need to be located in a rural location, provided that the planning and environmental effects are acceptable. As such, avoiding all adverse landscape and visual impacts is not possible, so these have been mitigated, as set out below and in the **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment [EN0110020/APP/6.7]**. Some of these mitigation measures include:

- Landscape Enhancement proposals, including the creation of woodland belts, reinforcement of existing field boundary hedgerows, new hedgerows to improve connectivity, reinforcement of roadside planting etc. These are further detailed within the **Outline Landscape and Ecology Management Plan [EN0110020/APP/5.13]**.

8.3.27 All lighting would be manually operated or Passive Infrared (PIR) motion activated and directed into the compounds, avoiding hedgerows, tree lines, woodland blocks, watercourses, ponds, and other areas to minimise impact on nocturnal or crepuscular fauna and potential sensitive residential receptors where possible

- All cables proposed across the Proposed Development will be underground, limiting the associated visual impact.
- Fencing for the substation compounds and BESS compound would be in a muted colour to be sensitive to the surrounding environment.
- Layout and design of haul roads and construction compounds have been set out to reduce loss of physical landscape features and minimum offsets to sensitive designations.
- Construction compounds and laydown areas to be located away from sensitive receptors where possible.

8.3.28 Further design work has been undertaken to mitigate impacts from residential receptors, including hamlets and villages as set out within **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment [EN0110020/APP/6.7]** and the **Design Approach Document [EN0110020/APP/5.7]**. Some of the changes to avoid and minimise impact on settlements and residents included:

- Conisbrough - Withdrew proposed solar by 300 m from southern edge of Conisbrough, reducing visual impact from the southern edge of the settlement and in views experienced when travelling along Sheffield Road.
- Wider land in W1 - Expansion of offsets from PROWs, maintaining one side open in several instances in response to feedback explaining the importance of the routes for recreation.
- Ulley - Removal of proposed solar panels north of Ulley to minimise impact on the setting and views from the village, and to fragment the Proposed Development across the wider landscape.
- Brampton en le Morthen - Removal of proposed solar panels on land south west of village to preserve sense of arrival to village from the west.

- Woodall and Harthill - Removal of proposed solar on land between Woodall and Harthill, north of Harthill Reservoir, to maintain openness between the two villages and reduce visual impact.
- High Moor - Increased offset from High Moor, siting solar beyond landform to minimise potential for visual impact from settlement.

8.3.29 The Proposed Development has sought to protect visual amenity experienced by people travelling on public rights of way across, and in proximity to, the Order Limits. The Proposed Development had previously defined a minimum offset of 15m from public rights of way to the closest solar panel, and 10m to the closest fence. This distance is exceeded in many parts of the Order Limits in order to provide natural variation and respond to specific features, for instance topography or existing visual amenity. Some of the areas where this distance is exceeded includes:

- Increase in the distance between Carr Lane and proposed solar panels to minimise impact on visual amenity experienced by people travelling on Carr Lane.
- Reduction in the area proposed to be occupied by solar panels west of Harthill Reservoir, protecting visual amenity experienced by people travelling on PRow around the northern edge of the reservoir.

8.3.30 Having taken the above extensive mitigation where avoidance was not possible, it is considered that EN-1 Section 5.10 and EN-3 paragraphs 2.10.85 - 2.10.93 and local policies are addressed through the above embedded mitigation measures which have been factored into the assessment of landscape, visual and residential amenity impacts.

8.3.31 Additional mitigation measures are contained within the **Design Approach Document [EN0110020/APP/5.7]**. These measures seek to further reduce any adverse landscape and visual effects (in addition to those measures embedded into the design of the Proposed Development). Such measures include implementing the following management plans:

- **Outline Construction Environmental Management Plan [EN0110020/APP/5.9]** – details vegetation protection measures to be implemented during construction.
- **Outline Soil Management Plan in the Outline Construction Environmental Management Plan [EN0110020/APP/5.9]** – would ensure that the soils are suitable following construction for establishment of the habitats proposed including the strategic planting proposed for mitigation of landscape and visual effects
- **Outline Decommissioning Environmental Management Plan [EN0110020/APP/5.11]** – confirms that the land within the Order Limits will be restored in accordance with the Outline Landscape and Ecology Management Plan.
- **Outline Construction Traffic Management Plan [EN0110020/APP/5.12]** – details that construction vehicle movements would be routed in accordance with an agreed strategy and avoid additional landscape and visual effects.
- **Outline Landscape and Ecology Management Plan [EN0110020/APP/5.13]** – details that planting will take place in the first available planting season and at a time of year appropriate to the species

being planted. Within the majority of habitat management areas (other than where transmission cable installation is required) habitat creation will begin in the first available planting season prior to construction commencing. The planting of hedgerow gaps and positive management to increase hedgerow size will commence in the planting season (i.e. winter) prior to the commencement of construction. This management plan also details how planting would be managed throughout the operational phase of the Proposed Development including how defective planting is to be replaced and how to ensure new planting establishes successfully.

### Residual Landscape and Visual Effects

- 8.3.32 After the implementation of the embedded mitigation measures, **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment [EN0110020/APP/6.7]** confirms that there are a number of significant residual impacts remaining. In terms of landscape effects, during construction, there would be a presence of construction activity, workers compounds and partially completed structures which would have direct effects on the landscape character. The construction works and activity would represent a change of land use from predominantly agricultural to an active construction site (and therefore activity and machinery of a greater scale than general farming).
- 8.3.33 In terms of construction visual effects, significant effects would be experienced by people within close proximity to, or with clear intervisibility with the proposed construction works. This is limited to people travelling along the Public Right of Way networks that pass adjacent to or through the Order Limits. In addition, it is regarding Viewpoints 1, 4, 5, 16, 35, 37, 39, 40, 44, 47, 48, 59, and 60. These include views from Clifton, Millennium viewpoint and Micklebring, Conisbrough Lodge, North Anston, Wickersley, Ulley, Upper Whiston, Harthill, and Woodall.
- 8.3.34 In terms of landscape effect at Year 1 of operation, the evident changes to the land use, from fields to solar panels and associate equipment would have a direct effect on the character of the Site, landscape character areas and local village characters covering the Site. For Year 1, the landscape character effects would be Moderate to Major Adverse (Significant) upon LCA 8: Central Rotherham Coalfield Farmland and LCA A1: Coalfield Farmland – Conisbrough to Denaby Coalfield Farmlands. All other LCAs within the Study Area were found to have not significant effects with four LCAs having Minor Adverse (Not Significant) effects and six LCAs to have Negligible Adverse (Not Significant) effects.
- 8.3.35 Regarding visual effects at Year 1, the assessment has identified the following potential significant effects of Major Adverse (Significant) Effects on Viewpoints 35, 40, and 48 and Moderate / Moderate to Major Adverse (Significant) Effects on Viewpoints 1, 4, 5, 16, 37, 39, 44, 47, 59, and 60. The assessment found there would be no significant effects on the remaining viewpoints.
- 8.3.36 At Year 15, the landscape character effects have reduced to Moderate Adverse (Significant) upon the host LCA A1: Coalfield Farmland – Conisbrough to Denaby Coalfield Farmlands and the LCA 8: Central Rotherham Coalfield Farmland. All other host and indirect landscape character areas were found to have not significant effects.
- 8.3.37 Year 15 visual effects assessment found that there would be Moderate to Major Adverse (Significant) Effects upon Viewpoints 4, 35, 40, 44, and 47 and Moderate

Adverse (Significant) Effects upon Viewpoints 1, 5, 35, 44, and 47. All other viewpoints at Year 15 were considered to have not significant effects.

- 8.3.38 The full summary of residual visual effects can be found within Table 7-12: Summary of Residual Effects within **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment [EN0110020/APP/6.7]**.

### Summary

- 8.3.39 The LVIA at **ES Volume 2, Chapter 7: Landscape and Visual Impact Assessment [EN0110020/APP/6.7]** has concluded that the Proposed Development will result in some adverse landscape and visual effects. As recognised in EN-1 paragraph 3.1.2, significant adverse effects can be expected for new nationally significant infrastructure projects. It is also expected in EN-1 paragraphs 5.10.5 and 5.10.13 that there will likely be adverse landscape and visual effects for many receptors. However, considerable effort has been made to minimise landscape and visual impacts of the Proposed Development, which is in accordance with EN-1 paragraph 5.10.19 where landscape and visual effects were considered in the early stages of siting and design. Critically the Secretary of State should consider how well designed a project is and whether an Applicant has genuinely sought to minimise harm to the landscape including by way of use of appropriate mitigation. EN-3 expands on this point and advises applicants to minimise landscape and visual impacts through screening.
- 8.3.40 The above policy requirements have been demonstrated clearly above to demonstrate the significant amount of design work that has been undertaken to demonstrate how the potential impact on the landscape has been taken into account. This has ensured that mitigation was embedded into the design from an early stage, and on a number of occasions developed and improved to include additional mitigation to ensure that the residual effects on viewpoints at Year 15 have been reduced as far as practicably possible. This does however have to be balanced by seeking to preserve the ability for an effective, well sited, renewable energy development to be constructed and operated. This is necessary to achieve sustained growth in Solar PV, as referenced in paragraph 2.10.2 of EN-3, which is required to meet the UK's net zero emissions 2030 target.
- 8.3.41 It is considered that the wider benefits of the Proposed Development, including the delivery of a significant amount of low carbon energy generation, biodiversity net gain and the provision of Permissive Paths, outweigh these adverse landscape and visual effects and that the Proposed Development is considered acceptable in terms of overall landscape, visual and residential amenity impacts. The Proposed Development is compliant with the EN-1, EN-3, EN-5 and other national and local planning policy.

## 8.4 Cultural Heritage and Archaeology

- 8.4.1 This section of the Planning Statement reviews the Proposed Development in the context of the planning policy for Cultural Heritage and Archaeology. This section should be read in conjunction with the **Policy Compliance Document [EN0110020/APP/5.5]**.
- 8.4.2 Paragraph 5.9.12 of EN-1 states that *“as part of the ES, the Applicant should provide a description of the significance of the heritage assets affected by the proposed development, including any contribution made by their setting”*. Paragraph 5.9.13 goes on to state *“Where a site on which development is*

*proposed includes, or the available evidence suggests it has the potential to include, heritage assets with an archaeological interest, the applicant should carry out appropriate desk-based assessment and, where such desk-based research is insufficient to properly assess the interest, a field evaluation”.*

- 8.4.3 In accordance with paragraph 5.9.11 and 5.9.12 of NPS EN-1, and the aforementioned relevant paragraphs contained within the NPPF, **ES Volume 2, Chapter 8: Cultural Heritage and Archaeology [EN0110020/APP/6.8]** includes a Cultural Heritage Assessment of the construction, operation and maintenance, and decommissioning phases of the Proposed Development, encompassing assessment of built heritage and the historic landscape.
- 8.4.4 The sources of information, including relevant historic records, used to inform the Archaeological Desk-Based Assessment are set out in **ES Volume 2, Chapter 8: Cultural Heritage and Archaeology [EN0110020/APP/6.8]**. This includes **ES Volume 3, Appendix 8.2: Cultural Heritage Baseline [EN0110020/APP/6.20]**, **ES Volume 3, Appendix 8.3: Sieving Exercise [EN0110020/APP/6.20]**, **ES Volume 3, Appendix 8.4: Assessment of Indirect Effects to Setting [EN0110020/APP/6.20]**, **ES Volume 3, Appendix 8.5: Geoarchaeological Desk Based Assessment [EN0110020/APP/6.20]**, **ES Volume 3, Appendix 8.6: Geophysical Survey [EN0110020/APP/6.20]**, and **ES Volume 3, Appendix 8.7: Archaeological Investigation and Preservation Strategy [EN0110020/APP/6.20]**.
- 8.4.5 **ES Volume 2, Chapter 8: Cultural Heritage and Archaeology [EN0110020/APP/6.8]** notes that there are no known designated heritage assets within the Order Limits. However, a number of designated heritage assets, within the wider surrounding area, were scoped into further assessment as they fell into the Study Area of 3km and these include:
- Three Grade II Listed Buildings within 500m of W1, two on Arbour Lane, and one in Micklebring
  - Five conservation areas within 2km of W1 – Clifton, Old Ravenfield, Old Edlington, Conisbrough, and Braithwell; and
  - Two scheduled monuments within 2km of W1, Conisbrough Parks Romano-British Villa immediately to the east and Conisbrough Castle to the northeast.
  - 29 Grade II Listed Buildings within 500m of W2, mostly associated with conservation areas;
  - Ten conservation areas within 2km of W2 – Whiston, Treeton, Ulley, Wickersley, Brampton-en-le-Morthen, Laughton-en-le-Morthen, Dinnington, Aston, North Anston, and South Anston; and
  - Six Scheduled Monuments within 2km of W2 – The glassworks cone at Catcliffe, Canklow Hill earthworks, Blue Man’s Bower moated site, Hellaby: a deserted medieval village and well, Castle Hill motte and bailey castle, and Manor House moated site.
- 8.4.6 Five Grade II Listed Buildings within 500m of W3, including:
- One Grade II\* Listed Building within 500m in Woodall - 4 Walseker Lane;
  - One Grade I Listed Building within 500m in Harthill - the Church of All Hallows;
  - Three conservation areas within 2km - Wales, Harthill, and Barlborough;

- One Scheduled Monument within 2km – Manor House moated site in Todwick; and
  - One Registered Park and Garden within 2km – Barlborough Hall.
- 8.4.7 Section 4.7 of EN-1, and Section 2.5 of NPS EN-3 refers to Criteria for “Good Design” for Energy Infrastructure, and the importance of responding sensitively to context, including heritage assets.
- 8.4.8 Paragraph 5.9.15 of EN-1 encourages applicants, where opportunities exist, to prepare proposals which can make a positive contribution to the historic environment. Paragraph 2.10.105 of EN-3 states applications should take account of the results of historic environment assessments in their design.
- 8.4.9 EN-1 paragraph 5.9.28 sets out the presumption in favour of conservation and, where appropriate, enhancing the significance of heritage assets.
- 8.4.10 In response to paragraph 5.9.15 – 5.9.17 and 5.9.28 of EN-1, opportunities for environmental enhancement in relation to cultural heritage are detailed in **ES Volume 2, Chapter 8: Cultural Heritage and Archaeology [EN0110020/APP/6.8]**. Proposed cultural heritage mitigations and enhancements include:
- Order Limits have been pulled back from Clifton Conservation Area and Ravenfield Conservation Area, after concerns were raised over its proximity and setting.
  - Conisbrough Parks Roman Villa has been removed from the Order Limits, as requested in non-statutory consultation responses.
  - Order Limits to the north of Ulley Conservation Area have been reduced.
  - 
  - Order Limits to the south east of Brampton en le Morthen have been reduced, after concerns were raised over the proximity and setting to these assets.
  - The use of alternate construction methods, which allow for ballast foundations of infrastructure above heritage assets, without causing physical disturbance or truncation of those assets.
  - Creation of exclusion zones which means no infrastructure is placed and no ground disturbance allowed, with the exception of planting associated with BNG.
  - The installation of the above non-intrusive infrastructure, and (at point of decommission) its removal, in accordance with a sensitive installation and decommissioning strategy.
- 8.4.11 Alongside the proposed enhancement opportunities to physical heritage assets as set out above, retention, management and new hedgerow planting as detailed in the **Outline Landscape and Ecology Management Plan [EN0110020/APP/5.13]** would serve to minimise adverse cultural heritage effects upon historic features outside of the Order Limits, such as adverse effects on their settings.
- 8.4.12 Paragraph 5.9.14 of NPS EN-1 sets out the process for considering the impacts of proposed developments upon the significance of heritage assets.
- 8.4.13 In summary, **ES Volume 2, Chapter 8: Cultural Heritage and Archaeology [EN0110020/APP/6.8]** states that during the construction, operation and maintenance and decommissioning phases of the Proposed Development,

adverse cultural heritage effects on known and unknown heritage assets are anticipated to be not significant, and temporary in nature. It is also noted that due to required excavations for the Proposed Development being limited to areas of hardstanding, that the potential to encounter unknown heritage assets is also limited and, in any event, would be appropriately managed by the **Outline Written Scheme of Investigation [EN0110020/APP/5.16]**.

### Substantial Harm Assessment

- 8.4.14 Paragraph 5.9.28 of EN-1 states that *“when considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset’s conservation. The more important the asset, the greater the weight should be. This is irrespective of whether any potential harm amounts to substantial harm, total loss, or less than substantial harm to its significance”*.
- 8.4.15 It is stated at paragraph 5.9.33 of EN-1 that *“Where the proposed development will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate securing its optimum viable use”*. EN-1 continues at paragraph 5.9.34 stating that *“in weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”*.
- 8.4.16 NPPF Paragraph 207 requires an application to describe the significance of any heritage asset affected by development applications, including any contribution made by their setting. Paragraphs 213 - 215 set out how levels of harm to designated heritage assets should be considered and weighed, with paragraph 216 setting out the process for non-designated heritage assets. The detailed policy response to these paragraphs is provided in Tables 4 and 5 of the **Policy Compliance Document [EN0110020/APP/5.5]**.
- 8.4.17 **ES Volume 2, Chapter 8: Cultural Heritage and Archaeology [EN0110020/APP/6.8]** provides criteria for classifying the magnitude of impacts to cultural heritage. ‘Major’ impacts are considered to be ‘substantial harm’ and anything less than ‘major’ is considered as being ‘less than substantial harm’. The Proposed Development, after the implementation of additional mitigation measures, is not anticipated to have a greater than minor impact magnitude on any known heritage assets, and therefore, substantial harm to those assets because of the Proposed Development is not anticipated. For undiscovered heritage assets, the implementation of the **Outline Written Scheme of Investigation [EN0110020/APP/5.16]** will act to manage potential adverse cultural heritage effects to a less than substantial harm impact magnitude.
- 8.4.18 The assessment conclusions set out in Section 8.10 of **ES Volume 2, Chapter 8: Cultural Heritage and Archaeology [EN0110020/APP/6.8]** have determined that in terms of direct effects, through the inclusion of embedded mitigation measures, no significant effects on direct heritage assets are predicted in either the construction, operation and maintenance and decommissioning phases of the Proposed Development. In regard to indirect physical effects, no significant adverse effects are predicted at construction, operation and maintenance or decommissioning. The installation of nearby solar panels is not expected to impact the subsurface remains of Scheduled Roman Villa SM1491751. No

impact is predicted to either designated or non-designated assets, resulting in no effect to significance.

- 8.4.19 Finally, regarding indirect effects to setting, no significant adverse effects are predicted at construction, operation and maintenance or decommissioning. However, moderate adverse effects to two Scheduled Monuments are predicted: 1010828 Conisbrough Castle and 1491751 Conisbrough Parks Romano-British Villa. These effects are considered to be not significant in terms of EIA regulations. Moderate adverse effects have been predicted to Barlborough Registered Park and Garden and Barlborough Conservation Area. These effects are considered as not significant in the context of EIA regulations. Minor adverse effects have been identified at Ulley Conservation Area. Minor Adverse effects to two Grade II Listed Buildings have also been predicted; 1314636 Hardwick Hall and 1151523 Manor House. As they are minor adverse effects they are, therefore, considered as not significant in the context of EIA regulations.
- 8.4.20 Therefore, with the implementation of embedded and additional mitigation measures, the Proposed Development will have effects on known heritage assets that are no greater than moderate, which is considered to be 'less than substantial harm'.
- 8.4.21 In recognising that the Proposed Development will result in harm of a 'less than substantial' nature, the key policy test (as per paragraph 5.9.33 of EN-1) is that such harm is weighted against the benefits outlined in Section 4 of this planning statement. Given the clear and urgent need to deploy renewable energy at speed and scale, the Proposed Development demonstrably gives rise to substantial public benefits, which outweigh the less than substantial harm identified.

### Summary

- 8.4.22 The Proposed Development has been designed taking into account known heritage assets, their status and their settings. The Proposed Development and associated works will be sited to minimise adverse effects on the settings of designated heritage assets. This has resulted in the Applicant avoiding significant effects on designated heritage assets and minimising to an acceptable level any other harms to identified heritage assets or their settings.
- 8.4.23 In accordance with EN-1 paragraph 5.9.33, the substantial public benefits and need for the Proposed Development as set out in earlier sections of this Planning Statement, including the delivery of Critical National Priority infrastructure to contribute towards meeting national energy security objective's and carbon reduction commitments, clearly and demonstrably outweigh the less than substantial harm to designated heritage assets and policy tests relating to substantial harm are therefore not triggered.
- 8.4.24 **ES Volume 2, Chapter 8: Cultural Heritage and Archaeology [EN0110020/APP/6.8]** and associated appendices assess the overall effects of the Proposed Development on heritage assets under the Planning (Listed Building and Conservation) Areas Act and the Infrastructure Planning (decisions) Regulations. However, it can be confirmed that the Proposed Development is considered to comply with all relevant cultural heritage planning policy by minimising harm to heritage assets through sensitive design and protecting as much of their significance as possible during the life of the Proposed Development.

## 8.5 Ground Conditions and Land Quality

- 8.5.1 This section of the Planning Statement reviews the Proposed Development in the context of the planning policy for ground conditions and land quality. This section should be read in conjunction with **ES Volume 2, Chapter 9: Ground Conditions and Land Quality [EN0110020/APP/6.9]** and the **Policy Compliance Document [EN0110020/APP/5.5]**. The ES chapter assesses the impact of the Proposed Development on ground conditions and land quality. The chapter is supported by various appendices including **ES Volume 3, Appendix 9.6: Agricultural Land Classification Report [EN0110020/APP/6.20]** for the Site.
- 8.5.2 Agricultural land quality is graded by the system of ALC decided by Natural England. The ALC system divides land into five grades 1 to 5, with grade 3 subdivided into 3a and 3b.
- 8.5.3 Paragraph 5.11.12 of EN-1 states that applicants should seek to minimise impacts on the Best and Most Versatile (BMV) agricultural land (defined as land in grades 1, 2 and 3a of the ALC) and preferably use land in areas of poorer quality (grades 3b, 4 and 5).
- 8.5.4 Paragraph 2.10.37 further states that the Secretary of State should take account of the economic and other benefits of the best and most versatile agricultural land, in decision taking.
- 8.5.5 Paragraph 5.11.34 of EN-1 advises that the SoS should ensure that applicants "*do not site their scheme on the best and most versatile agricultural land without justification*". EN-1 needs to be read in the context of the more specific focus in relation to ground mounted solar PV projects in EN-3. Paragraph 2.10.22 of EN-3 notes that "*development of ground mounted solar arrays is not prohibited on Best and Most Versatile agricultural land...*". However, it is noted that the choice of site should be explained by the applicant for the nationally significant infrastructure project, noting a preference for development to be situated on suitable brownfield, industrial and low and medium grade agricultural land.
- 8.5.6 This approach is also reflected in the 2024 Written Ministerial Statement: Solar and protecting our Food Security and Best and Most Versatile Land (BMV) Land which emphasises that BMV land should be avoided where possible and that due weight be given to proposed use of such land when considering whether planning consent should be granted for solar developments and references the NPPF.
- 8.5.7 Consistent with NPS EN-1, the NPPF states at paragraph 187b that the economic and other benefits of the BMV agricultural land should be recognised in planning decisions. BMV agricultural land is defined as land in grades 1, 2 and 3a of the Agricultural Land Classification. Footnote 65 of the NPPF was updated in the latest published NPPF to remove the need to consider the availability of land for food production when allocating significant development of agricultural land in Local Plans. Footnote 65 now states "*Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality*". Whilst the 2024 Written Ministerial Statement was not updated to reflect this NPPF change, the amendment to the now footnote 65 excludes the consideration of food production as a policy test, although it is capable of being an important and relevant consideration, as referenced in recent Secretary of State decisions for other solar NSIPs and is therefore considered further below.

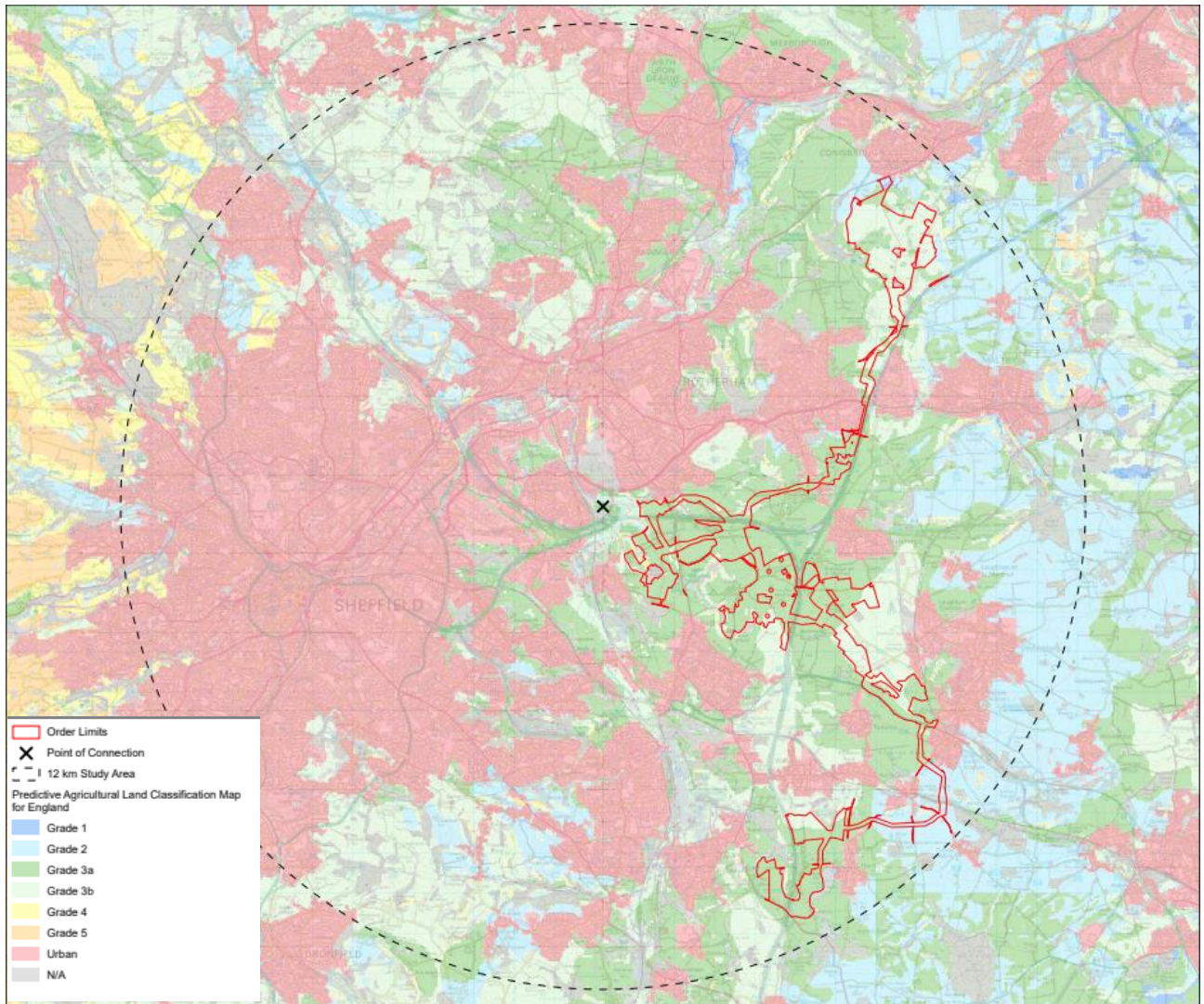
- 8.5.8 It should also be noted that the current, Labour Secretary of State's statement in the House of Commons on the 18 July 2024 called "Clean Energy Superpower Mission" stated that:
- "the biggest threat to nature and food security and to our rural communities is not solar panels or onshore wind; it is the climate crisis, which threatens our best farmland, food production and the livelihoods of farmers"*.
- 8.5.9 In view of the above, the NPPF and NPS EN-1 and EN-3 are now fully aligned with respect to the use of agricultural land within national planning policy (paragraph 5.11.12 of EN-1) requiring applicants to demonstrate that development of agricultural land is necessary and that impacts are minimised on BMV agricultural land. The Application has demonstrated through its site selection process as set out in **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN0110020/APP/6.4]** and the **Appendix 1: Site Selection Assessment** attached to this Planning Statement that it is necessary and justified to use agricultural land and that the use of BMV has been minimised with no significant effects arising in terms of permanent loss due to the temporary nature of the Proposed Development. This fully accords with current policy.
- 8.5.10 City of Doncaster Local Plan notes at Policy 60: Protecting and Enhancing Doncaster's Soil and Water Resources that *"Proposals on non-allocated sites that involve the significant loss of the best and most versatile agricultural land (grades 1, 2 and 3a) will only be supported where:*
- 1. There are no other suitable locations on lower quality agricultural land (or non-agricultural land) available; or*
  - 2. The land can be reinstated back to its previous state (where possible).*

### Best and Most Versatile Land: Site Selection

- 8.5.11 EN-3 sets out that ALC and type is one of the likely factors that will influence site selection. Both paragraphs 5.11.12 of EN-1 and 2.10.23 of EN-3 state that the use of lower grade agricultural land is preferred to the use of BMV with the position in EN-3 being that applicants should seek to utilise, where possible, *"suitable brownfield, industrial and low and medium grade agricultural land"*. The significant caveat to this is that paragraph 2.10.21 of EN-3 states that *"land type should not be a predominating factor in determining the suitability of the site location"*. Paragraph 2.10.22 of EN-3 further states that *"the development of ground mounted solar arrays is not prohibited on Best and Most Versatile agricultural land"* while 2.10.23 of EN-3 recognises that at NSIP scale, *"it is likely that applicants' developments will use some agricultural land"*.
- 8.5.12 Both EN-1 and EN-3 are clear that the Applicant is required to justify the use of agricultural land within projects but recognise that it may not be practicable to completely avoid the use of BMV land. In summary therefore, BMV is an important (but not predominant) factor influencing site selection; however, with justification for its use, policy is supportive in principle of its inclusion within projects.
- 8.5.13 **Appendix 1: Site Selection Assessment** of this Planning Statement explains the Applicant's approach to selection of an appropriate Site to take forward as part of an application for a nationally significant infrastructure scaled solar project. The assessment explains that initially there are a range of attributes that are required to develop a NSIP scale solar project, such as suitable irradiance and topography; a connection to the National Grid; and available land. These three attributes identified locations which had potential to be suitable for such solar development

and focussed the Applicant's search on sites within the local area of Rotherham and Doncaster, however as noted at paragraphs 4.3.9 – 4.3.19 of the assessment the initial factor for location was the available connection at the existing Brinsworth Substation. Once the search area was determined following the grid connection agreement being the initial factor, the Applicant applied specific environmental search criteria, including agricultural land grade to find appropriate land which would be able to deliver its objectives. The Applicant was focussed on trying to reduce the area of BMV agricultural land included within the Order Limits, and within the categories of BMV land, minimising the use of higher grade categories as much as possible, whilst balancing this with other impacts including residential amenity and landscape considerations.

- 8.5.14 Regarding context, it should be noted that Natural England technical advice note predicts that 42% of agricultural land within England is of BMV quality. Within South Yorkshire region, this rises to 46.97% which thereby increases the likelihood that higher quality agricultural land would be encountered for the Proposed Development.
- 8.5.15 At the time of the Site Selection Assessment, the Applicant used the provisional and predictive mapping data produced by Natural England, respectively to seek to identify land with lower or no agricultural classification. Extracts from the mapping data used are illustrated below:



**Figure 8.5.1 – Natural England Agricultural Land Classification Map Extract**

- 8.5.16 Natural England produces Predictive Best and Most Versatile Agricultural Land maps to help identify the likelihood of BMV agricultural land (Agricultural Land Classification Grades 1, 2, and 3a).
- 8.5.17 As demonstrated on the above figure demonstrating the provisional ALC mapping (Natural England), this area of South Yorkshire has a mixture of largely Grade 3 with small pockets of Grade 2 and 4. This indicates that complete avoidance of BMV is almost impossible for development of the scale proposed. On this basis, the Order Limits was considered favourable, based on predictive mapping at site selection stage and avoided the swathes of Grade 2 to the east and urban areas to the West. Consideration was given as to whether alternative land could be found with less impacts on agricultural land in proximity to the Brinsworth Substation.
- 8.5.18 However, from the published information the same type of grading is found throughout much of wider area, as indicated on **figure 8.5.1** above, and therefore sites which would be further from the point of connection (PoC) would be likely to have very similar gradings.

### Best and Most Versatile Land: Design Development

- 8.5.19 In order to determine the precise agricultural grade of the Order Limits, ALC surveys were undertaken in 2025 and 2026.
- 8.5.20 The survey conducted found that land within the Site that is classified as BMV land (ALC grades 1 – 3a) occupies a total of 220.48ha, which equates to 19.17% of the land within the Site. In terms of the remainder of the Site, the survey showed that there is 907.16ha of Grade 3b land and 3.64ha of Grade 4. The ALC survey seems to be broadly consistent with the data provided by Natural England in their mapping, as shown in **figure 8.5.1** above.
- 8.5.21 The majority of the Cable Corridor has not been surveyed for ALC. **ES Volume 2, Chapter 15: Socio-Economics and Land Use [EN0110020/APP/6.15]** estimates that approximately 15ha of BMV land would be likely to be temporarily used in the Cable Corridor for cable installation during the construction phase only. After this time, the cables would be covered over and the land returned to agricultural use.
- 8.5.22 At a site design level, the Applicant has sought to, where possible, reduce the use of BMV land, however, due to the nature of the land quality within the Order Limits and the general classification both locally and at a wider scale in South Yorkshire it has not been possible to avoid it entirely.
- 8.5.23 As noted in the **Design Approach Document [EN0110020/APP/5.7]** The quality of agricultural land has been considered throughout the iterative design process. This was first reflected in the initial site selection which, following review of Natural England's Provisional Agricultural Land Classification data, sought to site the Proposed Development outside of land identified as being best and most versatile (BMV). Opportunities to further reduce the extent BMV land have been taken throughout the pre-application phase; for instance, land north west of Firsby was identified as being a combination of Grade 1 and 2 and therefore BMV. This land was removed from the Order Limits after Statutory Consultation (after consideration of several wider factors alongside ALC). Similarly, the classification of agricultural land was also considered in the siting of substations, each of which are predominantly located on non-BMV land
- 8.5.24 The Applicant has sought to avoid and reduce the amount of BMV used for solar (and other hard infrastructure) development. While recognising the amount of BMV included, it has not been possible to locate all infrastructure outside of BMV land and to do so would reduce renewable energy generation capability in a location where there is available grid capacity, and at a time when the need for such development is urgent. This is a critical point and is consistent with Paragraph 2.10.23 of EN-3 which explains that solar farm developments are not prohibited on 'best and most versatile' agricultural land and that "*it is recognised that at this scale, it is likely that applicants' developments may use some agricultural land*". This point is further demonstrated by the limited availability of poorer grade land in the areas surrounding the Site.
- 8.5.25 As set out earlier in this section, EN-3 is very clear that land type should not be a predominating factor in site selection. The Applicant considers this is relevant in both the site selection and design development process. Neither EN-1 nor EN-3 place a higher policy emphasis on the use of agricultural land in comparison to other environmental considerations but require the Applicant to justify its use.
- 8.5.26 The other critical factor in the consideration of impacts on BMV is the degree of impact which it is deemed to have. The Proposed Development has an operational life of 60 years after which time all hard infrastructure above ground

and to 1.2m below ground would be removed from the land (as secured within the **Outline Decommissioning Environmental Management Plan [EN0110020/APP/5.11]**). For the vast majority of the Order Limits, this equates to the removal of solar PV arrays which are mounted on narrow piles and which have no demonstrable impact on the quality or condition of the ground below. As noted at paragraph 3.2.1 of **Outline Decommissioning Environmental Management Plan [EN0110020/APP/5.11]** the following elements will remain in-situ post-decommissioning:

- Landscape and Biodiversity Enhancements;
- Site Access Tracks; and
- Ducts for cabling buried below plough depth.

### Impacts on BMV Land

8.5.27 As set out above, the Applicant has sought to avoid and reduce the amount of BMV land used for hard infrastructure associated with the Proposed Development. However, given the context of the quality of land locally and within the Order Limits it has not been practicable to remove all BMV. 220.48ha of the Site is classified as BMV land (ALC grade 2 and grade 3a) which equates to 19.17% of the Site. This is land which will not be available as an agricultural resource, aside from potential use as grazing land, for a period of approximately (excluding construction and decommissioning) 60 years.

8.5.28 **Table 8.5.1** below, sets out other made solar DCOs and their associated use of BMV (within order limits) in quantum and as a percentage of the overall site. This demonstrates a range of values both above and below that of the Proposed Development.

	Site Size (ha)	BMV (ha)	BMV (%)
Cottam	1180	50	4
Gate Burton	652	80	12
Heckington Fen	524	257	49
Mallard Pass	852	360	42
Sunnica	981	37	5
West Burton	758	200	26
Springwell	1280	231.7	42.8
Fenwick	509	30.2	7

**Table 8.5.1: Made DCOs and use of BMV**

8.5.29 In the context of the Proposed Development’s impact on the wider BMV resource, the Applicant notes that in England, agricultural land represents between 69-70% of the total land within the country. Natural England estimates that around 42% of agricultural land within England is of BMV quality (with a roughly even split of 21% as Grades 1 and 2 and 21% Grade 3a) with the proportion of BMV in South Yorkshire as 46.7%. Therefore, in the context of the county, BMV land is abundant.

8.5.30 In this regard the Applicant considers the following:

- the Applicant’s compliance as far as practicable in applying the mitigation hierarchy and the weight that is associated with a CNP project, provide robust justification for the impact in terms of that required by way of paragraph 5.11.34 of the EN-1;

- the significant benefit associated with the delivery of BNG;
- the nature of the temporary conversion of intensively farmed arable land to grassland across most of the Site and the resulting significant beneficial impact on the quality of the soil; and
- the relatively negligible quantity of impact on the wider BMV resource in South Yorkshire.

8.5.31 It is also noted that there are no national planning policies, or policies in other areas of legislation, that require agricultural land (BMV or otherwise) to be farmed, or to be farmed in a particular way (e.g. arable cropping), although it is recognised that the grading of land relates to the flexibility of the soil resource to grow particular crops. Indeed, agri-environmental and farm support generally provide economic recompense for farming land less intensively and for providing environmental benefits. Therefore, there is no guarantee, as such, that the land would be used for productive arable use should the Proposed Development not be granted consent.

### Food Security

- 8.5.32 **ES Volume 2, Chapter 15: Socio-Economics and Land Use [EN0110020/APP/6.15]** states that most of the land within the Order Limits is arable agricultural land used for winter cereals or under grass, with some fields used for oil seed rape, winter beans, or left fallow or with stubble. The Chapter also notes that the most recent UK Government United Kingdom Food Security Report shows that the UK's production to supply ratio – the value of what is produced is in the UK compared with what is consumed – is broadly stable, with the UK producing 62% of all the food consumed in the country and 75% of the food that can be grown in the country. In relation to cereals, the production to supply ratio has increased over the last 20 years, and the UK now produces over 90% of the cereals it consumes.
- 8.5.33 Table 15-26 of **ES Volume 2, Chapter 15: Socio-Economics and Land Use [EN0110020/APP/6.15]** shows that the use of agricultural land within the Site for solar arrays, substations, BESS and access tracks and associated infrastructure would arise during construction and continue through the operation and maintenance phase for a period of up to 60 years, requiring the semi-permanent use of a total of up to 138.96 ha of BMV agricultural land and 557.24 ha of non-BMV agricultural land. Following the decommissioning of the Proposed Development, solar arrays, BESS and associated infrastructure would be removed, and land would be returned and be available for arable use. 77.57ha of BMV land would be used for mitigation planting and enhancement and it is not known at this stage whether planting would be left in place following decommissioning and the removal of the solar arrays as this would depend on the preference of individual landowners.
- 8.5.34 The construction of the Cable Corridor would also reduce available land for arable farming in the short-term and may disrupt farming for a period of up to 24-36 months, after which the land would be reinstated and available for arable use. Work on the Cable Corridor would be phased, and land would be reinstated soon after cable installation. Therefore, it is unlikely that land within the Cable Corridor would be required or disrupted for the full 24-36 months of the construction programme.
- 8.5.35 **ES Volume 2, Chapter 15: Socio-Economics and Land Use [EN0110020/APP/6.15]** demonstrates that the Proposed Development would

result in a semi-permanent impact on 1,311.28ha of agricultural land through the temporary use of land for solar PV, substations, BESS, access tracks and mitigation planting and enhancement, 220.48ha of which is BMV agricultural land. There would be a further impact on land within the Cable Corridor, although this would be short-term after which the land could be returned to its previous use. Chapter 15 confirms that the total area of agricultural land is a very small proportion of the available agricultural land in Rotherham and Doncaster (2.5%). On the basis that 97.5% of the agricultural land in the host authorities would remain available for food production, it is not considered that the Proposed Development would cause any concerns in relation to food security.

- 8.5.36 It is also relevant that there are wider government policies which actively support taking land out of agricultural use. This is evidenced by:
- UK Food Security Report, December 2004 - concludes that food production levels could be maintained or moderately increased alongside the land use change required to meet our Net Zero and Environment Act 2021 targets and commitments (see page 179).
- 8.5.37 Defra Agricultural Land Use in the United Kingdom reports (at 1<sup>st</sup> June 2024 and 1<sup>st</sup> June 2025) show that some 305,000ha of arable land was in agri-environmental (i.e. non-food producing) land uses by 1 June 2024, and this had increased to 444,000ha by 1 June 2025.

### Soil Impacts and Management

- 8.5.38 As set out within paragraph 5.11.13 of EN-1, applicants are encouraged to identify any potential effects on soil and seek to minimise the impacts on soil quality through mitigation measures. This follows into paragraph 5.11.14 of EN-1 which notes that “*Applicants are encouraged to develop and implement a Soil Management Plan which could help minimise potential land contamination*”.
- 8.5.39 The Natural England Technical Information Note TIN049 (2012) also provides guidance related to land quality and soils management in relation to non-agricultural uses.
- 8.5.40 An **Outline Soil Management Plan** has been submitted as part of the **Outline Construction Environmental Management Plan [EN0110020/APP/5.9]**. A soil management plan is secured via the **Draft DCO [EN0110020/APP/3.1]** as a requirement, which must be substantially in accordance with the **Outline Soil Management Plan (Outline Construction Environmental Management Plan [EN0110020/APP/5.9])**. The purpose of the **Outline Soil Management Plan (Outline Construction Environmental Management Plan [EN0110020/APP/5.9])** is to identify the importance and sensitivity of soil resource but also to provide measures for the management of this soil resource in order to maintain the physical properties of soil within the Order Limits. The **Outline Soil Management Plan (Outline Construction Environmental Management Plan [EN0110020/APP/5.9])** provides a summary of the key soil management principles to guide soil management during construction, soil storage and aftercare.
- 8.5.41 It is anticipated that the impacts upon soil structure and quality during both the construction and decommissioning phases of the Proposed Development are limited. In terms of the operational period of the Proposed Development, the soil quality will benefit from being protected and improve over the course of the Proposed Developments lifetime in a way which will permit unrestricted agricultural use to be facilitated after decommissioning.

- 8.5.42 The construction process for the solar PV arrays involves piling support poles into the ground. Importantly, the land is not sealed. The poles occupy a small area and are inserted into the ground under pressure. These poles are lightweight, profiled metal legs and are inserted into the ground using a pneumatic hammer action. There is no requirement for any lifting or mixing of soil and once driven in and the panels have been connected, there is no requirement for trafficking. The process is similar to that of knocking in a fence post and, consequently, the soil around the poles is not disturbed and moves laterally once the post is knocked in. It is important to recognise that this does not result in any change to the soil profile and that the soil resource, and the inherent land quality, is not affected. This is consistent with paragraph 5.11.13 of EN-1 which requires applicants to seek to minimise impact on soil quality.
- 8.5.43 During the operational and maintenance phase of the Proposed Development, the land beneath and surrounding the solar panels would be managed to deliver ecological mitigation and enhancement. This could involve measures such as new planting, including the creation of grassland and wildflower areas, which would help limit soil degradation and erosion. The Site would be managed in a way that enables the potential for grazing on some or all of the area. The extent to which grazing ultimately takes place will be driven by the response of farmers to the opportunity created by the Proposed Development.
- 8.5.44 For a development of this scale, and in this part of the country, it is considered impracticable to locate on land that is entirely outside of BMV agricultural land. **Appendix 1: Site Selection Assessment** of this Planning Statement sets out how the Proposed Development has reasonably avoided BMV agricultural land.
- 8.5.45 The approach taken by the Applicant for site selection and proposed mitigation measures is appropriate and compliant with national policy on the use of agricultural land.

### Groundwater

- 8.5.46 Paragraph 5.16.1 of EN-1 notes that "*infrastructure development can have adverse effects on the water environment, including groundwater...*". As a result of this, it is asked that applicants consider protective measures to control the risk of pollution to groundwater beyond those outlined in River Basin Management Plans and Groundwater Protection Zones as per paragraph 5.16.10 of EN-1.
- 8.5.47 In relation to the potential for impact on groundwater from trenchless works, piling activities and earthworks, the groundwater is deemed to have a medium importance where there are secondary aquifers and where groundwater abstraction points are present.

### Embedded Mitigation

- 8.5.48 The Applicant has proposed various measures in order to reduce the amount of BMV agricultural land within the Order Limits where hard infrastructure has been located.
- 8.5.49 As demonstrated within **Appendix 1: Site Selection Assessment** of this Planning Statement, the search for the Order Limits looked at focusing upon non-BMV agricultural land but noting it is not possible to remove all BMV agricultural land from the Order Limits as a whole. To do so would reduce the renewable energy generation capability in a location where there is available grid capacity, at a time when the need for such development is a priority, as confirmed in the

**Statement of Need [EN0110020/APP/5.8].** This is consistent with Paragraph 2.10.23 of EN-3 where it is recognised that at this scale, it is likely that applicants' developments may use some agricultural land.

- 8.5.50 Paragraph 9.6.13 of **ES Volume 2, Chapter 9: Ground Conditions and Land Quality [EN0110020/APP/6.9]** notes that during the operational phase of the Proposed Development there are various proposed embedded mitigation measures. These include the introduction of ecological enhancements which will contribute to BNG while also supporting both soil health and enhancing the overall habitat quality across the Site's entirety.

### Summary

- 8.5.51 **Appendix 1: Site Selection Assessment** of this Planning Statement summarises the process taken by the Applicant to locate the Order Limits in close proximity to the available capacity at Brinsworth Substation. A review of provisional and ALC mapping (Defra and Natural England) was undertaken and the Applicant took into account agricultural land quality when considering land within the search area. This included focussing their search on land identified provisionally as Grade 3, rather than the Grade 2 land further east.
- 8.5.52 ALC surveys were then conducted to confirm the land grades across the Site, and the results were taken into account by the Applicant to reduce any potential impact on BMV agricultural land.
- 8.5.53 In line with paragraph 2.10.23 of EN-3, some areas of BMV agricultural land are required to deliver the Proposed Development, as noted in the **Appendix 1: Site Selection Assessment** of this Planning Statement. Due to the nature of the Proposed Development and construction methods, which will include adherence to a detailed soil management plan, impacts upon the soil resource are minimised. The potential benefits of land management protocols are a result of arable soils reverting to pasture and include improved soil structure from long-term grassland allowing build-up of organic matter, reduced vulnerability to erosion by wind or water and enhanced soil micro bacterial activity.
- 8.5.54 Post-decommissioning, arable land management could resume following removal of the above ground solar infrastructure.
- 8.5.55 EN-3 paragraph 2.10.22 states that the development of large-scale solar PV is not prohibited on agricultural land and that agricultural land classification should not be a predetermining factor in the consideration of Development Consent applications. However, as a requirement of EN-1 and EN-3, justification for the use of agricultural land for the purposes of energy generation, specifically solar PV in EN-3, is required. **Appendix 1: Site Selection Assessment** of this Planning Statement sets out the process that determined the extent of the Order Limits, areas excluded from selection and justification for the decisions.
- 8.5.56 The site selection process considered suitable areas for solar development within a 12 km search area radius around the National Grid Brinsworth Substation, to minimise the risk of environmental impact, challenges with crossings, process loss, cost and delay of a longer cable route. The evidence provided in the Site Selection Report demonstrates that the Order Limits represent the most appropriate area for a development of the required scale to make best use of available grid capacity.
- 8.5.57 As confirmed above, the Proposed Development would result in the semi-permanent use of a total of up to 138.96 ha of BMV agricultural land and 557.24

ha of non-BMV agricultural land for solar arrays, BESS and associated infrastructure. Following the decommissioning of the Proposed Development, solar arrays, BESS and associated infrastructure would be removed, and land would be returned and be available for arable use. In addition, there would be 77.57ha of BMV land used for mitigation and enhancement planting, some of which may be permanent and a further estimated 15ha of BMV land temporarily used to lay cables in the cable corridor (which would be returned to agricultural use immediately after the cable is laid). The total arable land used for the development is a relatively small proportion of the available agricultural land in Rotherham and Doncaster (2.5% of all agricultural land).

8.5.58 In terms of the Secretary of State's consideration of the economic and other benefits of BMV land, the following points should be noted, as set out in Chapter 15:

- The contribution of the BMV land to food production is relatively small compared to the overall resource in the host authorities - the agricultural land within the Order Limits represents 2.5% of the available resource in the host authorities and the proportion of BMV is likely to be even smaller.
- Some evidence suggests that solar farms on agricultural land can give soil the opportunity to recover from intensive use with the potential for longer term benefit.
- There is also evidence that solar developments can provide a steady source of income for farmers that can help to support the long-term financial stability of farms. The Applicant has agreed options with 29 landowners to rent part of their land, which would provide an additional revenue stream to diversity farmers' incomes and support the financial sustainability of their businesses.

8.5.59 In order to meet the national renewable energy needs, some BMV agricultural land is required to be temporarily used for the delivery of solar electricity as without it, the electricity output would not fulfil the available grid capacity at Long Lane 400kV Substation. Therefore, with regard to agricultural land, the Proposed Development is considered acceptable pursuant to EN-1, EN-3, EN-5, NPPF and local planning policy.

## 8.6 Green Belt

8.6.1 Green Belt is assessed in further detail within **Appendix 2: Green Belt Assessment** of this Planning Statement.

8.6.2 Paragraph 5.11.37 of NPS EN-1 states 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. However, when considering any planning application affecting Green Belt land, the Secretary of State should ensure that substantial weight is given to any harm to the Green Belt when considering any application for such development, while taking account, in relation to renewable and linear infrastructure, of the extent to which its physical characteristics are such that it has limited or no impact on the fundamental purposes of Green Belt designation. Very special circumstances may include the wider environmental benefits associated with increased production of energy from renewables and other low carbon sources*".

8.6.3 Paragraph 153 of the National Planning Policy Framework, states that very special circumstances will not exist unless the potential harm to the Green Belt by

reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

- 8.6.4 **Appendix 2: Green Belt Assessment** of this Planning Statement concludes that the Proposed Development is located on grey belt land and meets the tests for being not inappropriate within the grey belt. 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. 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.
- 8.6.5 Whilst not determinative to this DCO Application, it is also relevant that the latest proposed revisions to the NPPF (December 2025) have added electricity network infrastructure to the definition of development which is not inappropriate in the Green Belt (proposed policy GB7) and should therefore not be regarded as harmful or requiring demonstration of very special circumstances. Electricity network infrastructure is defined as "*Infrastructure that facilitates the transmission of electricity from generation sources to end users, including transmission, distribution, and interconnection. This infrastructure is essential for the operation and expansion of the electricity network and includes components such as substations, converter stations, interconnectors, and cables.*" This supports the Applicant's position that the cables would not be regarded as inappropriate, regardless of whether the land meets the definition of grey belt. Under this definition, it is also considered that the substations and inverters would not be regarded as inappropriate development in the Green Belt.
- 8.6.6 The full assessment can be found within **Appendix 2: Green Belt Assessment** of this Planning Statement.

## 8.7 Water Resources and Flood Risk

- 8.7.1 This section of the Planning Statement reviews the Proposed Development in the context of the planning policy for water resources and flood risk. This section should be read in conjunction with **ES Volume 2, Chapter 10: Water Resources and Flood Risk [EN0110020/APP/6.10]** and the **Policy Compliance Document [EN0110020/APP/5.5]**.
- 8.7.2 Paragraph 5.8.12 of EN-1 states that development should be designed to ensure there is no increase in flood risk elsewhere, accounting for the predicted impacts of climate change for the duration of the Proposed Development lifetime. The paragraph specifically states that "*There should be no net loss of floodplain storage and any deflection or constriction of flood flow routes should be safely managed within the site*".
- 8.7.3 Paragraph 5.8.13 of EN-1 states that applications for energy projects of 1 hectare or greater in Flood Zone 1 in England and all proposals for energy projects located in Flood Zone 2 and 3 in England should be accompanied by a flood risk assessment (FRA). The Order Limits include land identified within Flood Zones 2 and 3 and therefore an FRA is required.

- 8.7.4 An FRA has been included within **ES Volume 3, Appendix 10.3: Flood Risk Assessment [EN0110020/APP/6.20]** which has been prepared in accordance with the requirements of Section 5.8 of EN-1 and both the adopted and draft NPPF. Table 1 of the **Policy Compliance Document [EN0110020/APP/5.5]** confirms that the FRA has been prepared in full accordance with the requirements of EN-1. The likely effects of the Proposed Development associated with flood risk have been assessed in **ES Volume 2, Chapter 10: Water Resources and Flood Risk [EN0110020/APP/6.10]**. The **ES Volume 3, Appendix 10.3: Flood Risk Assessment [EN0110020/APP/6.20]** concludes that the risk of the Proposed Development flooding from all sources is deemed not significant.
- 8.7.5 However, flood risk can effectively be managed via mitigation measures identified within **ES Volume 3, Appendix 10.3: Flood Risk Assessment [EN0110020/APP/6.20]** and **Outline Surface Water Drainage Strategy [EN0110020/APP/5.17]**. One of the key mitigation measures is that the PV panels located within flood risk areas will be mounted on solar PV frames and elevated completely above the design flood level.
- 8.7.6 Paragraph 5.8.21 of EN-1 requires the Sequential Test to be followed which ensures that a sequential, risk-based approach is followed to steer new development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account. Where it is not possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites with medium risk.
- 8.7.7 EN-1 paragraph 5.8.23 goes on to state that the consideration of alternative sites should take account of the policy on alternatives and that all projects should apply the Sequential Test to locating development within the Order Limits. Paragraph 5.8.29 continues the theme of design, advising that the sequential approach should be applied to layout and design. It states that "*Vulnerable aspects of the development should be located on parts of the site at lower risk and residual risk of flooding*".
- 8.7.8 Paragraph 5.8.36 of EN-1 sets out the criteria with regard to flood risk that the SoS should be satisfied is addressed when determining the DCO Application. The **ES Volume 3, Appendix 10.3: Flood Risk Assessment [EN0110020/APP/6.20]** has been prepared in accordance with EN-1 and the NPPF requirements. This is further requested within paragraph 2.10.76 of EN-3, which notes that where a flood risk assessment has been carried out, this must be submitted alongside the Applicant's ES and must consider the impact of drainage. The Applicant considers that the FRA satisfies the relevant provision within paragraph 5.8.36 of EN-1.
- 8.7.9 Paragraph 5.8.41 of EN-1 also goes on to state that "*Energy projects should not normally be consented within Flood Zone 3b, or Zone C2 in Wales, or on land expected to fall within these zones within its predicted lifetime. This may also apply where land is subject to other sources of flooding (for example surface water). However, where essential energy infrastructure has to be located in such areas, for operational reasons, they should only be consented if the development will not result in a net loss of floodplain storage and will not impede water flows*".
- 8.7.10 Paragraph 2.4.11 of NPS EN-3 states that "*Solar photovoltaic (PV) sites may also be proposed in low lying exposed sites. For these proposals, applicants should consider, in particular, how plant will be resilient to:*
- *Increased risk of flooding; and*
  - *Impact of higher temperatures*".

- 8.7.11 NPPF paragraph 170 states that “*Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere*”.
- 8.7.12 As demonstrated within the recently granted Springwell Solar Farm Order 2026, while it is not normal for energy projects to be consented within Flood Zone 3b, the Secretary of State concluded at paragraph 4.82 of the Secretary of State Decision Letter:

*“that paragraph 5.8.41 of NPS EN-1 provides that projects should not normally be consented within Flood Zone 3b, rather than imposing an absolute prohibition. In this case, the Secretary of State has taken into account that the solar PV panels proposed to be located in the Flood Zone 3b are not solid built infrastructure and that water can flow freely beneath them [ER 13.4.14], and that the FRA demonstrates that the Proposed Development would not increase flood risk elsewhere, nor result in a net loss of floodplain storage or impedance of water flows [ER 13.5.6]”.*

### Sequential Test

- 8.7.13 In accordance with paragraph 5.8.21 of NPS EN-1 the Applicant has applied a sequential, risk-based approach to steer new development to areas with the lowest risk of flooding, taking all sources of flood risk and climate change into account. This has been set out within **Appendix 1: Site Selection Assessment** of this Planning Statement.

### Location

- 8.7.14 As outlined within **Appendix 1: Site Selection Assessment** of this Planning Statement, during the site selection stage, the secured grid connection at Brinsworth Substation (pre- Long Lane 400kV Substation as noted within **Appendix 1: Site Selection Assessment** of this Planning Statement) was the starting point for selecting the Order Limits for the Proposed Development. National Grid substations with spare capacity are finite and should be utilised wherever possible to assist in fulfilling the urgent need for new renewable energy development as part of delivering Net Zero targets.
- 8.7.15 Having identified the PoC and secured a connection agreement, the Applicant undertook a search within 12km for suitable areas of land for NSIP scale solar development, driven by the desire to be as close to the PoC as possible, in order to minimise the risk of environmental impacts, challenges with crossings and process losses, and the cost and delay of a longer cable route. During the exercise undertaken by the Applicant, it was identified that land within the area to the east of the Order Limits is largely BMV land, and that land further beyond that to the east falls predominantly within Flood Zones 2 and 3. On the basis that land was likely to be both suitable and available in areas largely in Flood Zone 1, the Applicant focussed on these areas, before considering land largely in Flood Zones 2 and 3, extending from Goole to Newark on Trent, in compliance with the sequential test. This band of Flood Zones 2 and 3 therefore provided further support for the 12km Search Area. Looking east from the PoC towards Lincolnshire and Nottinghamshire, there is a cluster of other Nationally Significant Infrastructure Projects at various stages of the DCO process. The Applicant also

sought to consider the potential for cumulative impacts with these schemes, which ruled out the inclusion of land parcels further east alongside other reasons.

- 8.7.16 Land to the west of the PoC was ruled out due to the proximity to the urban areas of Rotherham and Sheffield, alongside the proximity of the Peak District National Park.
- 8.7.17 At the time of the site selection process, the Environment Agency flood mapping was used, and it was clear from this that there were only very small parcels of Flood Zones 2 and 3 in the Search Area which would not be used for development, with the remainder falling predominantly within Flood Zone 1. It should be noted that this flood mapping has recently been updated in December 2025 to include up to date flood modelling and some additional small areas of the Order Limits are now located within Flood Zones 2 and 3. The Applicant based its site selection on the available information at the time, which showed that the Site fell almost entirely within Flood Zone 1 and therefore passed the Sequential Test for flood risk at a site selection level with no further assessment required at Application stage. However, the Applicant has considered the up to date flood modelling from a site design perspective and has located sensitive electrical equipment outside of the small areas of Flood Zones 2 and 3 now falling within the Site according to the up to date flood modelling. There is however a small percentage of solar panels which lie in Flood Zones 2 and 3 and these have been designed to be above the flood extent plus climate change and will not increase flood risk overall **ES Volume 3, Appendix 10.3: Flood Risk Assessment [EN0110020/APP/6.20]**.
- 8.7.18 Given the changes to the mapping post-site selection stage, the Applicant does not consider it is appropriate or proportionate to go back to the site-selection stage from a flood risk perspective, and has considered the implications of the small area of solar panels being located within Flood Zone 2 from a design perspective as set out in the **ES Volume 3, Appendix 10.3: Flood Risk Assessment [EN0110020/APP/6.20]** and **Design Approach Document [EN0110020/APP/5.7]**.
- 8.7.19 The Applicant considers that the due consideration outlined above during site selection stage satisfies paragraph 5.8.36 of EN-1 to the extent that the Sequential Test has been applied and satisfied as part of site selection. Furthermore, the EA were consulted early on in the design development process and were clearly amendable to a solution for siting solar PV arrays within the areas at risk of flood which did not increase the risk of flooding within the Order Limits or elsewhere. The Applicant therefore applied the Sequential Test at site selection and then at a site design level carried out a balancing exercise based on the ability to reduce and mitigate impacts and on the basis that an acceptable solution could be reached with the EA in relation to flood risk.

### Layout and Design

- 8.7.20 EN-1 paragraph 5.8.23 goes on to state that the consideration of alternative sites should take account of the policy on alternatives and that all projects should apply the Sequential Test to locating development within the Order Limits. Paragraph 5.8.29 continues the theme of design, advising that the sequential approach should be applied to layout and design. It states that "*Vulnerable aspects of the development should be located on parts of the site at lower risk and residual risk of flooding*".

- 8.7.21 Following the selection of the Order Limits, the Applicant applied a sequential approach to the layout and design of the Proposed Development. The EA's Flood Map for Planning indicates that there are small areas of the Site situated within Flood Zone 2 and 3, indicating a medium to high probability of flooding from fluvial and tidal sources. Flooding from all sources has been further assessed within the **ES Volume 2, Chapter 10: Water Resources and Flood Risk [EN0110020/APP/6.10]**.
- 8.7.22 The design process sought to avoid higher risk areas of Flood Zone 3b. Paragraph 5.8.41 of EN-1 states that "*energy projects should not normally be consented within Flood Zone 3b...or on land expected to fall within these zones within its predicted lifetime*". However, where essential energy infrastructure has to be located in such areas, for operational reasons, they should only be consented if the development will not result in a net loss of floodplain storage and will not impede water flows. The Government's guidance on flood risk and coastal change provides information on flood vulnerability classification at Annex 3. Annex 3 defines essential infrastructure as:
- Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk;
  - Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including infrastructure for electricity supply including generation, storage and distribution systems; including electricity generating power stations, grid and primary substations storage; and water treatment works that need to remain operational in times of flood.
  - Wind Turbines
  - Solar Farms.
- 8.7.23 Based on the above definition, the Proposed Development is classified as essential infrastructure. As outlined in the in the **Appendix 1: Site Selection Assessment** of this Planning Statement, the location of the Proposed Development was determined by the proximity to the PoC for operational reasons.
- 8.7.24 However as set out above, there will be no electrical infrastructure located within Flood Zone 3b (functional floodplain), and where land within this area has been included in within the Order Limits, it will only be used for enhancements and/or mitigation. On this basis, it is considered that the Proposed Development meets the first part of paragraph 5.8.41 of NPS EN-1, and the second part of the paragraph does not apply, given that there will be no electrical infrastructure located within Flood Zone 3b.
- 8.7.25 Therefore, the Applicant considers that it has demonstrated compliance with the relevant sections of paragraph 5.8.36 in relation to the Sequential Test to site selection and a sequential approach to the site layout and design.

### Exceptions Test

- 8.7.26 Following the completion of the Sequential Test and in accordance with the requirements of paragraph 5.8.9 of EN-1, the Applicant has applied the Exception Test to the proposed Solar PV arrays and infrastructure within Flood Zones 2 and 3. **ES Volume 3, Appendix 10.3: Flood Risk Assessment [EN0110020/APP/6.20]** sets out that in the NPPF the Exception Test needs to be passed in order for essential development to be considered acceptable in Flood Zones 2 and 3. EN-1 paragraph 5.8.11 further replicates the tests set out in Paragraph 178 of the NPPF which state that:

- The development would provide wider sustainability benefits to the community that outweigh the flood risk; and
- The development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

8.7.27 In relation to the first bullet point, above, the Applicant considers that the substantial benefits that the Proposed Development would deliver, as set out in Section 3 of this Planning Statement and considered further in the planning balance at Section 9, would clearly outweigh flood risk. As documented within the **Statement of Need [EN0110020/APP/5.8]**, these are considered to be 'sustainability benefits to the community' as specified in paragraph 178 of the NPPF for the following reasons:

- significant renewable energy schemes at this scale are required to be able to meet the legally binding commitment to Net Zero and make energy more affordable and reliable for all;
- the Proposed Development delivers local community benefits through the proposed permissive paths, biodiversity net gain and environmental enhancements;
- Significant socio-economic effects are also anticipated through an investment during construction via the provision of full-time jobs for both the construction and operational phases. This is documented within **ES Volume 2, Chapter 6.15: Socio-Economics and Land Use [EN0110020/APP/6.15]** and managed within the **Outline Skills and Supply Chain Management Plan [EN0110020/APP/5.18]**.

8.7.28 Regarding the second bullet point of paragraph 178 of the NPPF, the Proposed Development is to introduce various mitigation measures, including:

- Sequentially setting out the proposed development, ensuring that sensitive electrical equipment is not located within the flood zone 3b floodplain, wherever possible.
- The raising of electrical equipment above the design flood level where required to minimise the impact on floodplain storage to acceptable levels or adverse changes in flood flows.

8.7.29 **ES Volume 3, Appendix 10.3: Flood Risk Assessment [EN0110020/APP/6.20]** concludes that the Proposed Development will not increase flood risk from any sources. The Applicant therefore considers that the Proposed Development complies with the Exception Test requirements set out in paragraph 5.8.11 of EN-1. As such, the Applicant considers that its approach to site selection and the design level site selection demonstrates compliance with the requirements of paragraphs 5.8.21, 5.8.23 and 5.8.29 in EN-1.

8.7.30 The Applicant considers that the section above demonstrates the Applicant's compliance with the key policy tests and requirements from EN-1, notably paragraph 5.8.36, in relation to Flood Risk. It is considered that the site selection process has had due regard to the Sequential Test and that the design and layout has taken a sequential approach and considered the flood risk characteristics of the site, with the most vulnerable uses being located in the lowest risk areas. The Applicant considers that the Proposed Development is acceptable in flood risk terms.

- 8.7.31 In reference to the section of paragraph 5.8.36 of EN-1 that requires the Proposed Development to provide safe access and escape routes as part of an emergency plan, the **Outline Construction Environmental Management Plan [EN0110020/APP/5.9]**, **Outline Operational Environmental Management Plan [EN0110020/APP/5.10]** and **Outline Decommissioning Environmental Management Plan [EN0110020/APP/5.11]**, which each set out a requirement for an Emergency Response Procedures and Health and Safety Plan which both specifically require flood risk to be addressed. These documents are all secured by way of requirement in the **Draft DCO [EN0110020/APP/3.1]**. The Applicant therefore considers that it is compliant with the relevant section of 5.8.36 in EN-1.
- 8.7.32 Solar farms (i.e. the panels themselves) are not considered to result in significant increases in runoff when compared to the existing greenfield situation. This is on the basis that runoff from the panels themselves will simply drop directly to the ground where the natural regime will be maintained. The Proposed Development includes a drainage strategy within the **Outline Surface Water Drainage Strategy [EN0110020/APP/5.17]** which sets out how the detailed drainage design and strategy will utilise SuDS. The Applicant therefore considers that it is compliant with the relevant section of 5.8.36.
- 8.7.33 Paragraph 5.16.3 of EN-1 requires the applicant to undertake an assessment of existing status of, and impacts of the proposed project on, water quality, water resources and physical characteristics of the water environment as part of the Environmental statement. Paragraph 5.16.7 of EN-1 lists what should be included within the ES.
- 8.7.34 Paragraph 5.16.13 of EN-1 notes that impacts on the water environment will generally be given more weight where a project would have an adverse effect on the achievement of the environmental objectives established under the Water Framework Directive. Paragraph 5.16.15 of EN-1 states that a proposal should have regard to the River Basin Management Plans and meet the Water Framework Directive Regulations 2017 requirement. It adds the overall aim of development should be to prevent deterioration in the status of water bodies to support the achievement of the objectives in the River Basin Management Plans and not to jeopardise the future achievement of good status or good potential for any affected water bodies.
- 8.7.35 It is further discussed within paragraph 2.10.146 of EN-3 that "*water management is a critical component of site design for ground mount solar plants*". Particularly discussing that where previous management of the Site has involved intensive agricultural practices, solar sites can deliver significant ecosystem services value in the form of drainage, flood attenuation, natural wetland habitat, and water quality management.
- 8.7.36 **ES Volume 2, Chapter 10: Water Resources and Flood Risk [EN0110020/APP/6.10]** assesses all likely significant effects of the Proposed Development upon the water bodies within the study area. The analysis from these findings is set out in further detail within section 10.7 of **ES Volume 2, Chapter 10: Water Resources and Flood Risk [EN0110020/APP/6.10]**.
- 8.7.37 Paragraph 5.16.8 of EN-1 states the SoS should consider whether mitigation measures are needed over and above any which may form part of the project application. This is followed on by paragraph 5.16.10 which states that "*The risk of impacts on the water environment can be reduced through careful design to facilitate adherence to good pollution control practice*".

- 8.7.38 The environmental measures secured in the **ES Volume 3, Appendix 10.3: Flood Risk Assessment [EN0110020/APP/6.20]**, **Outline Design Parameters [EN0110020/APP/7.3]** and **Outline Surface Water Drainage Strategy [EN0110020/APP/5.17]** include an offset of 10m from the bank top between watercourses and infrastructure, and sufficient planting of native grassland and wildflower mixes between, under and surrounding the solar PV modules to mitigate the 'drip line'.
- 8.7.39 The NPPF paragraph 187(e) states that planning policies and decision should "*contribute to and enhance the natural and local environment by...preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability*". It is considered that the results of the assessment of water environment affects included in **ES Volume 2, Chapter 10: Water Resources and Flood Risk [EN0110020/APP/6.10]** accords with the NPPF in regard to water environment impacts.
- 8.7.40 Rotherham Metropolitan Borough Council Core Strategy discusses within Policy CS25 (Dealing with Flood Risk) that "*Proposals within flood zones 2 and 3 will be required to demonstrate that other sites in lower flood risk zones within the Rotherham Regeneration Area have been assessed and can be shown to be unable to accommodate the proposed development. Applicants must also set out the flood risk mitigation measures incorporated into the design and demonstrate how these reduce flood risk to an acceptable level and maintain safe access both to the site and its surroundings during times of flood*".
- 8.7.41 City of Doncaster Local Plan discusses flood risk and flood management within Policy 57: Flood Risk Management. The full policy is within the **Policy Compliance Document [EN0110020/APP/5.5]**, along with the analysis of the Applicant's compliance with the aforementioned policy.

### Summary

- 8.7.42 Paragraph 5.8.42 of EN-1 confirms that, exceptionally, where an increase in flood risk elsewhere cannot be avoided or wholly mitigated, the SoS may grant consent if they are satisfied that the increase can be mitigated to an acceptable and safe level taking into account the benefits of the Proposed Development. In this case, it has not been possible to wholly mitigate the potential flood risk because in some small localised areas where a small portion of the solar panels would experience limited flooding at their base, there is a negligible impact on flood plain storage, but is considered in the **ES Volume 3, Appendix 10.3: Flood Risk Assessment [EN0110020/APP/6.20]** and **Outline Surface Water Drainage Strategy [EN0110020/APP/5.17]** to be negligible.
- 8.7.43 However, the Applicant considers that the section above demonstrates the Applicant's compliance with the key policy tests and requirements from EN-1, notably paragraph 5.8.36, in relation to water resources and flood risk. It is considered that the site selection process has passed the Sequential Test and that the design and layout has considered the flood risk characteristics of the Order Limits and taken a sequential approach. The Applicant considers that the Proposed Development is acceptable in flood risk terms.
- 8.7.44 The Proposed Development is considered to be in compliance with EN-1, EN-3, NPPF, and with the relevant local planning policy, as set out above and within the **Policy Compliance Document [EN0110020/APP/5.5]**.

## 8.8 Climate Change and Greenhouse Gas Assessment

- 8.8.1 This section of the Planning Statement reviews the Proposed Development in the context of the planning policy for climate change and greenhouse gases. This section should be read in conjunction with **ES Volume 2, Chapter 11: Climate Change and Greenhouse Gas Assessment [EN0110020/APP/6.11]** and the **Policy Compliance Document [EN0110020/APP/5.5]**.
- 8.8.2 The potential impacts of the Proposed Development on climate change, as well as the vulnerability of the Proposed Development to the effects of climate change, are considered in **ES Volume 2, Chapter 11: Climate Change and Greenhouse Gas Assessment [EN0110020/APP/6.11]** which has been prepared in accordance with the relevant policy.
- 8.8.3 In summary, the Proposed Development is expected to result in a significant beneficial impact on greenhouse gas emissions with approximately 18,000,000 tCO<sub>2</sub>e saved over the 60-year operational lifetime of the Proposed Development.
- 8.8.4 As set out in the earlier sections of this Planning Statement, paragraphs 2.2.3 and 2.2.4 of EN-1 note the legally binding targets upon the UK Government to cut greenhouse gas emissions, the challenging nature of the transition, and the major investment in new technologies required. The resulting urgent need for new nationally significant electricity infrastructure projects is set out in paragraph 3.3.1 of EN-1. Section 3.3 of EN-1 sets out the resulting need of solar at paragraph 3.3.23 to 3.3.24. The **Statement of Need [EN0110020/APP/5.8]** refers to the relevant NPS and demonstrates the role of the Proposed Development in contributing to net zero and reducing GHG emissions.
- 8.8.5 Section 2.4 of EN-3 notes climate change adaptation and resilience confirming that solar development sites need to be resilient to increased risk of flooding and the impact of higher temperatures on the planet.
- 8.8.6 NPPF paragraph 161 states the planning system should support the transition to net zero by 2050 and shape places in ways that contribute to radical reductions in GHG emissions. Paragraph 168 of the NPPF states that local planning authorities should not require applicants to demonstrate the overall need for renewable or low carbon energy and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse emissions. Tables 4 and 5 in **Policy Compliance Document [EN0110020/APP/5.5]** addresses NPPF policy.
- 8.8.7 Addressing the impacts of climate change is a central objective of both the Rotherham Metropolitan Borough Council Core Strategy and the City of Doncaster Local Plan. This is further assessed by the Applicant within Table 6 and Table 7 in **Policy Compliance Document [EN0110020/APP/5.5]** addresses NPPF policy.

### Climate Change

- 8.8.8 Paragraph 4.10.1 of EN-1 states that new energy infrastructure must be sufficiently resilient against the possible impacts of climate change otherwise it will not be able to satisfy the energy needs outlined in Part 3 of the NPS.
- 8.8.9 Paragraph 4.10.8 of EN-1 requires applicants to consider the impacts of climate change when planning the location, design, build, operation, and where appropriate, decommissioning of new energy infrastructure.

- 8.8.10 EN-1 continues at paragraph 4.10.13 to advise that the “*Secretary of State should be satisfied that applicants for new energy infrastructure have taken into account the potential impacts of climate change*”. At paragraph 4.10.15 it continues to state that “*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*”.
- 8.8.11 Paragraph 2.4.11 of EN-3 discusses the introduction of solar photovoltaics and how they are typically proposed within low-lying exposed sites. With the policy noting that applicants should consider how the equipment is resilient to increased risk of flooding and the impact of higher temperatures.
- 8.8.12 Paragraph 2.3.2 of EN-5 requires the consideration of the effects of flooding (particularly on substations that are vital for the electricity transmission and distribution network), winds and storms (on overhead lines), higher average temperatures (leading to increased transmission losses), earth movement or subsidence caused by flooding or drought (on underground cables) and coastal erosion (for the landfall of offshore transmission cables and their associated substations in the inshore and coastal locations respectively).
- 8.8.13 In response to these paragraphs, the **Design Approach Document [EN0110020/APP/5.7]** describes how the Proposed Developments project design principles were developed and have been applied in the design evolution of the Proposed Development from the outset. The principles relating to climate change include the following:
- Maximise the amount of renewable energy provided to the National Grid;
  - Craft a project that is resilient to Climate Change; and
  - Limit the amount of embodied carbon across the project where reasonable.
- 8.8.14 Both **Appendix 1: Site Selection Assessment** of this Planning Statement, and **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN0110020/APP/6.4]** set out the process that the Applicant took for identifying the Order Limits. Climate resilience has been embedded throughout the design of the Proposed Development, through the setting of technical parameters for solar infrastructure, and how it is laid out.

### Summary

- 8.8.15 It has been demonstrated that the Proposed Development provides a significant beneficial effect in terms of impacts upon greenhouse gas emissions and is the type of infrastructure that is seen as both urgent and of a critical national priority by the UK Government.
- 8.8.16 It is considered that the Proposed Development strongly complies with the relevant policy set out in EN-1 and EN-3 and that the beneficial impact attracts substantial weight in the planning balance. Therefore, the Proposed Development fulfils the policy requirements of EN-1, and in doing so meets the objectives of NPPF paragraph 161.

## 8.9 Air Quality

- 8.9.1 This section of the Planning Statement reviews the Proposed Development in the context of the planning policy for Air Quality. This section should be read in

conjunction with **ES Volume 2, Chapter 12: Air Quality [EN0110020/APP/6.12]** and the **Policy Compliance Document [EN0110020/APP/5.5]**.

- 8.9.2 Paragraph 5.2.8 of EN-1 requires development that is likely to have adverse effects on air quality to undertake an assessment of the impacts of the proposed project as part of the ES. An air quality assessment has been undertaken and the impacts of the Proposed Development are reported in **ES Volume 2, Chapter 12: Air Quality [EN0110020/APP/6.12]**. This is followed by Paragraph 5.2.9 describing what Environmental Statement Chapters should include with regard to air quality. The content of EN-1 Paragraph 5.2.16 states that the Secretary of State should give substantial weight where a project would lead to a deterioration of air quality.
- 8.9.3 **ES Volume 2, Chapter 12: Air Quality [EN0110020/APP/6.12]** concludes that there would be no likely significant residual effects on air quality.
- 8.9.4 The nature of the Proposed Development means that the operational phase is very unlikely to result in any significant emissions to the air. Traffic-related impacts for the operation and maintenance phase is minimal, as described in **ES Volume 2, Chapter 12: Air Quality [EN0110020/APP/6.12]**. There will also be no combustion plant on Site. As such, there are no receptors from the operational phase of the Proposed Development upon Air Quality.
- 8.9.5 The **Dust Management Plan** as part of the **Outline Construction Environmental Management Plan [EN0110020/APP/5.9]** sets out the mitigation measures to be incorporated to reduce impacts during the construction phase of the Proposed Development. Some of these mitigation measures include (but not limited to):
- Minimise dust and environmental impact on site by locating machinery and dusty activities away from sensitive areas, using solid screens or enclosures, managing stockpiles with covers or fencing, promptly removing dust-generating materials, preventing runoff, and maintaining cleanliness with wet methods;
  - Appropriately manage waste and ensure no waste is burnt on site;
  - Minimise trackout and dust dispersion by using water-assisted sweepers on access roads, covering vehicles during transport, installing and maintaining hard-surfaced haul routes with damping and cleaning systems, implementing wheel washing facilities, inspecting and repairing haul routes promptly, and positioning access gates away from sensitive receptors; and
  - Access roads will be regularly cleaned and damped down with water. All vehicles entering or exiting the Site during the construction and decommissioning phase will pass through a wheel washing facility.
- 8.9.6 An **Outline Decommissioning Environmental Management Plan [EN0110020/APP/5.11]** has been submitted with the DCO Application. A final version of this will be produced at the time of decommissioning and this will be secured as part of the **Draft DCO [EN0110020/APP/3.1]**. The **Outline Decommissioning Environmental Management Plan [EN0110020/APP/5.11]** notes that some of the mitigation measures proposed to reduce impacts on air quality include:
- Implementation of a proportionate communications approach, including provision of contact details for the party responsible for decommissioning

works to enable air quality-related enquiries and complaints to be received and addressed promptly;

- Appointment of a nominated site contact responsible for air quality and dust management during decommissioning; and
- Preparation and implementation of a Dust Management Plan, setting out proportionate measures for the control of dust and particulate emissions during decommissioning works.

### Summary

- 8.9.7 As concluded in **ES Volume 2, Chapter 12: Air Quality [EN0110020/APP/6.12]**, on the basis that the application of appropriate mitigation measures is in place, there are expected to be no likely significant effects on air quality, either in isolation or in combination with other projects.
- 8.9.8 In summary, the Proposed Development is not anticipated to have any residual adverse effects on air quality during the construction, operational and maintenance and decommissioning associated phases. Therefore, there is no requirement for substantial weight to be afforded against the Proposed Development in the planning balance as per the advice within paragraph 5.2.16 of EN-1.

## 8.10 Traffic and Transport

- 8.10.1 This section of the Planning Statement reviews the Proposed Development in the context of the planning policy for traffic and transport. This section should be read in conjunction with **ES Volume 2, Chapter 13: Traffic and Transport [EN0110020/APP/6.13]** and the **Policy Compliance Document [EN0110020/APP/5.5]**.
- 8.10.2 In accordance with paragraph 5.14.5 of EN-1, **ES Volume 2, Chapter 13: Traffic and Transport [EN0110020/APP/6.13]** assesses the impact of the Proposed Development on transport and access, including a transport assessment which is provided at **ES Volume 3, Appendix 13.2: Transport Statement [EN0110020/APP/6.20]**.
- 8.10.3 Paragraph 5.14.7 of EN-1 states the applicant should prepare a travel plan including demand management measures to mitigate transport impacts. A travel plan is submitted within the **outline Construction Traffic Management Plan [EN0110020/APP/5.12]**, which will be secured by way of Requirement within the **Draft DCO [EN0110020/APP/3.1]**.
- 8.10.4 EN-1 paragraph 5.14.19 notes that new NSIPs may give rise to substantial impacts on surrounding transport infrastructure and that applicants should seek to mitigate these impacts, including during the construction phase of the Proposed Development.
- 8.10.5 The nature of the Proposed Development is such that the greatest traffic and transport impacts are likely to occur during both the construction and decommissioning phases. This is acknowledged in Paragraph 2.10.161 of the EN3 which confirms that once solar farms are in operation, traffic movements to and from the Proposed Development are generally 'very light'. All road users during the operational phase have been scoped out of the ES assessment due to the impacts of the local road system being minimal during the operational phase,

as stated in **ES Volume 3, Appendix 13.2: Transport Statement [EN0110020/APP/6.20]**.

- 8.10.6 In response to NPS EN-1 Paragraph 5.14.19, the mitigation measures proposed are set out in **ES Volume 2, Chapter 13: Traffic and Transport [EN0110020/APP/6.13]** and will be secured through the **outline Construction Traffic Management Plan [EN0110020/APP/5.12]** and the final Construction Traffic Management Plan which will be secured by way of requirement in the **Draft DCO [EN0110020/APP/3.1]**. In summary, the mitigation measures include:
- Construction traffic management measures, including the provision of signage at the proposed site accesses;
  - Provision of traffic marshals at the proposed site accesses and at any crossing points between the road network and the Site during the construction phase to ensure vehicle movements are safely controlled;
  - The use of a Worker Travel Plan for construction staff to manage the arrival and departure profile of workers and to encourage the use of sustainable modes of transport;
  - The use of necessary escorts for the transport of Abnormal Indivisible Loads (AILs) for transformers to the development site; and
  - Wheel washing facilities will be provided within each temporary construction compound to prevent mud from being trafficked onto the highway.
- 8.10.7 **ES Volume 2, Chapter 13: Traffic and Transport [EN0110020/APP/6.13]** concludes that following the application of mitigation measures, the potential for adverse traffic and transport related effects during the construction and decommissioning phases arising from the Proposed Development would be not significant.
- 8.10.8 Paragraph 5.14.12 of EN-1 states where mitigation is needed possible demand management measures must be considered before requirements for provisions of new infrastructure to deal with any remaining transport related impacts. Paragraph 5.14.16 of EN-1 states *“the Secretary of State should have regard to the cost-effectiveness of demand management measures”*.
- 8.10.9 In response, as concluded in **ES Volume 2, Chapter 13: Traffic and Transport [EN0110020/APP/6.13]** mitigation is embedded into the design of the Proposed Development and set out in the **outline Construction Traffic Management Plan [EN0110020/APP/5.12]**. With the mitigation measures proposed as part of the Proposed Development, impacts of the Proposed Development do not require any new transport infrastructure to be constructed/implemented.
- 8.10.10 Paragraph 5.14.13 of EN-1 states that maritime and inland waterway transport methods or rail transport are preferred over road transport at all stages of the project, where cost-effective. Paragraph 5.14.17 of EN-1 states that Applicants should consider DfT policy guidance *“Water Preferred Policy Guidelines for the movement of abnormal indivisible loads”* when preparing their application, and paragraph 5.14.18 confirms that where the cost of meeting obligations or requirements would make the proposal economically unviable, this should not in itself justify the relaxation by the Secretary of State of any obligations or requirements needed to secure the mitigation.
- 8.10.11 It is acknowledged that the construction activities where river access would be most suited would be the movement AILs. During the construction phase of the

Proposed Development, the number of AIL trips generated is minimal, with the transformers considered major AIL and delivered as one delivery each, consisting of AIL transportation on 6 days only across the construction programme, which would result in very localised impacts. Additionally, there will be a requirement for cables to be delivered to construct the Cable Corridor. While the final sizing of these will be determined in detailed design, the size of delivery equipment is typically smaller than for transformers, and access bellmouths have been designed to accommodate these deliveries

- 8.10.12 As confirmed within the Department for Transport policy guidance, it is government policy to avoid road transport as far as practically possible by using alternative transport modes, such as water. It goes on to state that where the applicant is applying to move a wide and heavy load by road and there is a water option the onus is on them to show why it should not be used. In this case, it can be confirmed that there is no water option and therefore transportation would need to take place via roads.

### Summary

- 8.10.13 The above assessment concludes that there is no significant adverse effect likely for transport and access elements of the Proposed Development and therefore, the Proposed Development is in accordance with the relevant policies of EN-1.
- 8.10.14 Mitigation has been considered and embedded into the design of the development of the Proposed Development, including through the implementation of the **outline Construction Traffic Management Plan [EN0110020/APP/5.12]**.
- 8.10.15 Paragraph 5.14.22 of NPS EN-1 advises that the SoS should only consider “*refusing development on highways grounds if there would be an unacceptable impact on highway safety, residual cumulative impacts on the road network that would be severe*”. There are no grounds relating to highways impacts in this regard and therefore the Applicant considers that it is compliant with the relevant policy tests in this regard.
- 8.10.16 Overall, the Proposed Development is considered to be in compliance with NPS EN-1, NPS EN-3, NPPF and local planning policies with regard to both Traffic and Transport effects.

## 8.11 Noise and Vibration

- 8.11.1 This section of the Planning Statement reviews the Proposed Development in the context of the planning policy for Noise and Vibration. This section should be read in conjunction with **ES Volume 2, Chapter 14: Noise and Vibration [EN0110020/APP/6.14]** and the **Policy Compliance Document [EN0110020/APP/5.5]**.
- 8.11.2 Paragraph 5.12.5 of EN-1 identifies the factors that will determine the likely noise and vibration impacts of proposed NSIPs which, in summary include; inherent operational noise, proximity to sensitive noise receptors, proximity to 'quiet places' and potential impacts upon wildlife. Paragraph 5.12.6 of EN-1 sets out the specific requirements for noise and vibration assessments.
- 8.11.3 **ES Volume 2, Chapter 14: Noise and Vibration [EN0110020/APP/6.14]** sets out a noise assessment of the Proposed Development which was prepared in accordance with the requirements set out in paragraph 5.12.6 of EN-1. The assessment considers the noise generating activities during each phase of the

Proposed Development and assesses the worst-case scenario in terms of duration of impact, time of day/night it could potentially occur and proximity of the activity to sensitive receptors.

- 8.11.4 Paragraph 5.12.8 of EN-1 states that the noise impact of ancillary activities, including increased traffic, should be considered. The noise impact of the construction traffic is based on the assessment of the projected changes in traffic flow as set out in **ES Volume 2, Chapter 14: Noise and Vibration [EN0110020/APP/6.14]**.
- 8.11.5 Paragraph 5.12.15 of EN-1 requires developments to demonstrate good design through the selection of the quietest cost-effective plant available; containment of noise within buildings where possible; optimisation of plant layout to minimise noise emissions; and, where possible, the use of landscaping, bunds or noise barriers to reduce noise transmission.
- 8.11.6 Paragraphs 2.10.131 to 2.10.136 of the EN-3 refers to impacts arising from construction including traffic and transport noise and vibration. The focus is on mitigating construction and decommissioning phase transport impacts, such as noted in EN-3 paragraph 2.10.131 where the local highways authority may request that the Secretary of State impose controls on the number of vehicle movements to and from the solar farm site in a specified period. However, it is discussed that the Secretary of State should be satisfied that environmental effects related to construction traffic after mitigation are acceptable, as consistent with the generic policy set out in EN-1. It is noted that EN-3 paragraph 2.10.153 confirms that once solar farms are in operation, traffic movements to and from the Proposed Development are generally 'very light'. As set out above and in **ES Volume 2, Chapter 14: Noise and Vibration [EN0110020/APP/6.14]** the construction and decommissioning impacts have been properly assessed and proposed mitigation measures ensures that there would be no significant effects arising.
- 8.11.7 Paragraph 5.12.17 of NPS EN-1 states that consent should not be granted unless development proposals meet with the following aims:
- Avoid significant adverse impacts on health and quality of life from noise;
  - Mitigate and minimise other adverse impacts on health and quality of life from noise; and
  - Where possible, contribute to improvements to health and quality of life through the effective management and control of noise.
- 8.11.8 Paragraph 5.12.13 of EN-1 refers to the consideration by the Secretary of State for the need for mitigation measures both for operational and construction noise over and above any which may form part of the DCO Application. Paragraph 5.12.13 of the EN-1 refers to a requirement to take into account guidance in the NPPF with regard to setting requirements to secure appropriate additional mitigation.
- 8.11.9 Paragraph 187 of the NPPF states that planning policies and decisions should prevent new development from contributing to unacceptable levels of noise pollution. Paragraph 198 of the NPPF also requires new development to mitigate, and reduce to a minimum, potential adverse impacts resulting from noise and to avoid significant adverse impacts of noise on health and quality of life. This is further assessed by the Applicant within Table 4 in the **Policy Compliance Document [EN0110020/APP/5.5]**.

## Mitigation and Management

- 8.11.10 The predicted impacts of noise and vibration generated from the Proposed Development are considered in **ES Volume 2, Chapter 14: Noise and Vibration [EN0110020/APP/6.14]**. This chapter summarises that the greatest potential noise effects are predicted to occur during the construction and decommissioning phases of the development, with operational noise generally limited to the BESS, inverters and the on-site substations.
- 8.11.11 Specific measures to mitigate noise and vibration impacts are embedded into the design of the Proposed Development. However, further mitigation measures are secured through the **Outline Construction Environmental Management Plan [EN0110020/APP/5.9]**, **Outline Operational Environmental Management Plan [EN0110020/APP/5.10]**, and **Outline Decommissioning Environmental Management Plan [EN0110020/APP/5.11]**. These include standard good practice measures such as use of Best Practicable Means to reduce disturbance associated with noise and vibration during construction as far as reasonably practicable, with reference to relevant guidance. The implementation of final management plans, which will effectively manage adverse effects that may impact local amenity in relation to noise and vibration, will ensure the Proposed Development is in specific accordance with the relevant paragraphs in EN-1 and EN-3.
- 8.11.12 The noise assessment in **ES Volume 2, Chapter 14: Noise and Vibration [EN0110020/APP/6.14]** and **ES Volume 2, Chapter 18: Summary of Significant Effects [EN0110020/APP/6.18]** confirms that it is not expected that there will be any significant adverse effects generated by the Proposed Development. This is in accordance with Paragraph 5.12.8 of NPS EN-1.
- 8.11.13 It should be noted that the final technical specification of the Proposed Development is not yet determined, as this will be done during detailed design. However, the Applicant confirms that good design with regard to minimising noise and vibration impacts is demonstrated through embedded mitigation.
- 8.11.14 As a result of the outcome of the noise and vibration assessment, and in response to paragraph 5.12.13 of EN-1, it is not anticipated that the Secretary of State will need to consider additional mitigation measures above those already embedded within the design as set out in detail within **ES Volume 2, Chapter 14: Noise and Vibration [EN0110020/APP/6.14]**.

## Summary

- 8.11.15 As concluded within **ES Volume 2, Chapter 14: Noise and Vibration [EN0110020/APP/6.14]** through the inclusion of both embedded and additional mitigation measures set out within the assessment, there are no significant adverse noise and vibration effects as a result of the Proposed Development. This results the Proposed Development being in accordance with paragraph 187 and 198 of NPPF.
- 8.11.16 The implementation of the measures set out in **Outline Construction Environmental Management Plan [EN0110020/APP/5.9]**, **Outline Operational Environmental Management Plan [EN0110020/APP/5.10]**, and **Outline Decommissioning Environmental Management Plan [EN0110020/APP/5.11]**, will reduce adverse noise and vibration effects addressing relevant policy across EN-1 and EN-3.

8.11.17 Therefore, the Proposed Development is in accordance with EN-1, EN-3 and the NPPF.

## 8.12 Socio-Economics and Land Use

- 8.12.1 This section of the Planning Statement reviews the Proposed Development in the context of the planning policy for Socio-Economics and Land Use. This section should be read in conjunction with **ES Volume 2, Chapter 15: Socio-Economics and Land Use [EN0110020/APP/6.15]** and the **Policy Compliance Document [EN0110020/APP/5.5]**. It should be noted that impacts on agricultural land as a land use is also covered in chapter 15, but is addressed separately earlier in this Planning Statement.
- 8.12.2 Paragraph 5.13.2 of EN-1 states that applicants should undertake and include in their application an assessment of socio-economic impacts where the project is likely to have impacts at a local and regional level. EN-1 paragraph 5.13.4 later outlines that the assessment should consider all relevant socio-economic impacts. The full wording of the paragraph, along with the detailed project response, is set out in Table 1 of the **Policy Compliance Document [EN0110020/APP/5.5]**.
- 8.12.3 Paragraph 5.13.9 of EN-1 notes that Secretary of State should have regard to potential "*socio-economic impacts of new energy infrastructure identified by the applicant and from any other sources that the Secretary of State considers to be both relevant and important to its decision*". Paragraph 5.13.11 of EN-1 requires the Secretary of State to consider relevant positive provisions the applicant has made or is proposing to make to mitigate impacts and any legacy benefits that may arise.
- 8.12.4 **ES Volume 2, Chapter 15: Socio-economics and Land Use [EN0110020/APP/6.15]** considers the potential effects of the Proposed Development on employment. The assessment finds that the majority of socio-economic beneficial impacts experienced during the construction and decommissioning phases relate to the creation of employment opportunities and increased spend on local services. During construction, it is anticipated that there would be 1,616 FTE jobs created as a result of direct, indirect and induced employment opportunities and that 538 of these would be from the local Study Area. Once operational, impacts on local labour market arising from operational and maintenance jobs would be more limited but still present, with 39 FTE direct, indirect and induced jobs created.
- 8.12.5 The Proposed Development would also result in a positive contribution to the economy, generating £222.6m GVA from direct, indirect and induced impacts during the two-year construction period and £2.1m annually throughout operation.
- 8.12.6 While the duration of decommissioning is expected to take between 12 and 24 months, as set out in **ES Volume 1, Chapter 5: The Proposed Development [EN0110020/APP/6.5]**, meaning it is shorter than the construction phase, the employment effects would still be similar but for a shorter term. These impacts are assessed as having moderate beneficial impacts on the local economy.
- 8.12.7 Paragraph 5.13.8 of EN-1 refers to the possible requirement to mitigate adverse socio-economic effects. Mitigation measures to manage and minimise potential socio-economic effects are set out in the **Outline Construction Environment Management Plan [EN0110020/APP/5.9]** and **Outline Skills and Supply Chain Management Plan [EN0110020/APP/5.18]**.

- 8.12.8 The Applicant considers that the commitments made within the **Outline Skills and Supply Chain Management Plan [EN0110020/APP/5.18]** align with the intentions of paragraph 5.13.12 of EN-1. This paragraph advises that the Secretary of State may wish to include a requirement of such a plan which details "*...arrangements to promote local employment and skills development opportunities, including apprenticeships, education, engagement with local schools and colleges and training programmes to be enacted*". The **Outline Skills and Supply Chain Management Plan [EN0110020/APP/5.18]** addresses each of the matters detailed in 5.13.12 and therefore the Applicant considers the Proposed Development to be compliant with the requirements of the policy in this regard.
- 8.12.9 Finally, Paragraph 39 of the NPPF advises that developments that seek to improve the economic, social, and environmental conditions of an area should be supported. It is considered that the results of the assessment of socio-economic effects included in **ES Volume 2, Chapter 15: Socio-economics and Land Use [EN0110020/APP/6.15]** accord with the NPPF with regard to socio-economic impacts.

### Summary

- 8.12.10 **ES Volume 2, Chapter 15: Socio-economics and Land Use [EN0110020/APP/6.15]** sets out the proposed impacts in relation to socio-economics and identifies a number of beneficial effects produced by the Proposed Development at the various phases.
- 8.12.11 Paragraph 5.13.10 advises that the Secretary of State may conclude that limited weight is given to assertions of socio-economic impacts that are not supported given the importance of energy infrastructure (i.e. the benefits of proposed energy infrastructure development on a national scale).
- 8.12.12 The Applicant considers that the benefits secured are tangible. In any event, the Applicant considers the Proposed Development to be compliant with the aforementioned requirements relating to socio-economic effects in EN-1 and acceptable in this regard.

## 8.13 Other Environmental Topics

### Waste

- 8.13.1 This section of the Planning Statement reviews the Proposed Development in the context of the planning policy for Waste. This section should be read in conjunction with **ES Volume 2, Chapter 16: Other Environmental Topics [EN0110020/APP/6.16]** and the **Policy Compliance Document [EN0110020/APP/5.5]**.
- 8.13.2 NPS EN-1 sets out in section 5.15 'Resource and Waste Management' the strategy Applicants should consider for reducing the amount of waste where possible and trying to use it as a resource wherever possible. Paragraph 5.15.7 notes that the "*applicant should set out the arrangements that are proposed for managing any waste produced and prepare a report that sets out the sustainable management of waste and use of resources throughout any relevant demolition, excavation and construction activities*".

- 8.13.3 Paragraph 5.15.12 adds that “*Applicants are encouraged to prepare a materials management plan to inform the use of construction best practices in relation to storing materials in an adequate and protected place on site to prevent waste, or degeneration of valuable materials, for example, from accidental damage or excessive weathering*”.
- 8.13.4 It goes on to discuss that Applicants should be sourcing materials from recycled or reused sources and use low carbon materials, sustainable sources and local suppliers.
- 8.13.5 As part of the submission, an **Outline Construction Environmental Management Plan [EN0110020/APP/5.9]** and **Outline Decommissioning Environmental Management Plan [EN0110020/APP/5.11]** have been submitted. Section 7 of the **Outline Construction Environmental Management Plan [EN0110020/APP/5.9]** sets out an **Outline Site Waste Management Plan** which summarises the standard good-practice measures to be implemented by the Principal Contractor to manage construction phase waste, with the aim of ensuring compliance with relevant legislation and contractual requirements, minimising waste generation, and reducing reliance on disposal. At the time of decommissioning, a decommissioning waste management plan will be in place that is both proportionate to the nature and scale of works at the time of decommissioning.
- 8.13.6 Paragraph 5.15.13 notes that “*The Secretary of State should consider the extent to which the applicant has proposed an effective system for managing hazardous and non-hazardous waste arising from the construction, operation and decommissioning of the proposed development*”.
- 8.13.7 In light of the **Outline Construction Environmental Management Plan [EN0110020/APP/5.9]** and **Outline Decommissioning Environmental Management Plan [EN0110020/APP/5.1]** being secured through a DCO Requirement, and a commitment for detailed management plans to be prepared and approved prior to commencement of the construction and decommissioning phases, it is considered that the Scheme accords with the requirements of NPS EN-1 in respect of Waste Management.
- 8.13.8 The Barnsley, Doncaster and Rotherham Joint Waste Plan (March 2012) and Derby and Derbyshire Waste Local Plan (March 2005) both set out the vision, objectives, spatial strategy and development management policies for minerals and waste development in the local area. The policies in the Joint Waste Plan and Local Plan solely focus on the provision of waste facilities and therefore are not considered explicitly relevant in the context of the Proposed Development.
- 8.13.9 It is considered that the anticipated impacts from the Proposed Development in relation to waste can be sufficiently mitigated through adherence to the measures set out in the **Outline Construction Environmental Management Plan [EN0110020/APP/5.9]** and **Outline Decommissioning Environmental Management Plan [EN0110020/APP/5.11]**. These, along with the detailed versions to be provided post-consent will ensure that the Proposed Development is developed with good practices towards use of materials and water, and management of waste in keeping with the principles of the Waste Hierarchy.
- 8.13.10 Therefore, the Proposed Development is in accordance with the relevant national and local policies.

## Glint and Glare

- 8.13.11 This section of the Planning Statement reviews the Proposed Development in the context of the planning policy for Glint and Glare. This section should be read in conjunction with **ES Volume 2, Chapter 16: Other Environmental Topics [EN0110020/APP/6.16]** and the **Policy Compliance Document [EN0110020/APP/5.5]**.
- 8.13.12 NPS EN-3 notes at paragraph 2.10.150 that *“Solar PV panels are designed to absorb, not reflect, irradiation. However, the Secretary of State should assess the potential impact of glint and glare on nearby homes, motorists, public rights of way, and aviation infrastructure...”*.
- 8.13.13 EN-3 goes on to discuss that *“whilst there is some evidence that glint and glare from solar farms can be experienced by pilots and air traffic controllers in certain conditions, there is no evidence that glint and glare from solar farms results in significant impairment on aircraft safety. Therefore, unless a significant impairment can be demonstrated, the Secretary of State is unlikely to give any more than limited weight to claims of aviation interference because of glint and glare from solar farms”*.
- 8.13.14 **ES Volume 2, Chapter 16: Other Environmental Topics [EN0110020/APP/6.16]** is supported by **ES Volume 3, Appendix 16.2: Glint and Glare Report [EN0110020/APP/6.20]** which summarises that the solar panels are by no means a highly reflective surface, as they are designed to absorb sunlight and not to reflect it. However, as solar panels have flat, smooth surfaces they do reflect a certain concentrated amount of sunlight back to the receiver (receptor). This is ‘specular’ reflection. The more polished a surface is, the more it shines. ‘Diffused’ reflection occurs on rough or uneven surfaces and, therefore, the light is not seen as bright.
- 8.13.15 Other components such as the onsite substation or battery energy storage system are not a source of solar reflections due to their lack of reflective materials included in the design, and the cable corridors that export the electricity generated by the Proposed Development are buried underground and therefore do not require to be considered in the Glint and Glare Assessment.
- 8.13.16 When all factors are considered, glint and glare effects may be generated by solar panels at the Proposed Development Site. As the construction and decommissioning phases involve only partial panel installation, the resulting reflections would be reduced in both duration and intensity compared with those associated with the fully operational array, which is the basis of this assessment. The Assessment therefore only considered the Operational Effects, which represents the worst-case scenario.
- 8.13.17 As the **ES Volume 3, Appendix 16.2: Glint and Glare Report [EN0110020/APP/6.20]** notes, various embedded mitigation measures have been incorporated into the Proposed Development. Some of the embedded mitigation measures include the solar PV panels being either black, blue or dark grey in colour with anti-reflective coating. In addition, there will be sufficient screening proposed (as illustrated on the **ES Volume 3, Figure 5.1: Illustrative Masterplan [EN0110020/APP/6.19]**) in the intervening space between the receptor and solar PV modules to restrict visibility and the opportunity for glint and glare.
- 8.13.18 In addition, it can be confirmed that the Proposed Development is committed to mitigating glint and glare impacts to acceptable levels through either detailed design or additional screening. Prior to construction, when detailed design and

equipment selection has been confirmed, further glint and glare modelling will be undertaken to confirm if and where additional mitigation is needed.

- 8.13.19 The glint and glare impacts of the Proposed Development have been shown not to be significant in EIA terms. There will be no unacceptable impact on the operation of aircraft movement, no adverse impacts upon railway safety and extremely limited impacts on residential amenity as a result of glint and glare once the proposed embedded and additional mitigation is in place. The Proposed Development is therefore considered to meet the requirements of NPS EN-3.

### Telecommunications and Utilities

- 8.13.20 This section of the Planning Statement reviews the Proposed Development in the context of the planning policy for Telecommunications and Utilities. This section should be read in conjunction with **ES Volume 2, Chapter 16: Other Environmental Topics [EN0110020/APP/6.16]** and the **Policy Compliance Document [EN0110020/APP/5.5]**.
- 8.13.21 Given the relatively low height of the panels and other project infrastructure, the Proposed Development will not interfere with above ground telecommunications infrastructure. As a result, no effects on above ground telecommunications are anticipated during the construction, operation and maintenance, and decommissioning phases of the Proposed Development.
- 8.13.22 However, there is the potential for underground utilities to be adversely impacted by the Proposed Development specifically throughout the construction and decommissioning phases. Standard practice involves consulting with relevant utilities and telecommunications providers such as those for water, waste water, gas and electricity to identify any existing infrastructure constraints.
- 8.13.23 The **outline Construction Environmental Management Plan [EN0110020/APP/5.9]** sets out measures compliant with environmental regulations to minimise environmental impacts relating to utilities diversion. In addition, protective provisions for the benefit of statutory undertakers and electronic communications network code operators are included in the **draft DCO [EN0110020/APP/3.1]**.
- 8.13.24 It can be confirmed that embedded mitigation measures are anticipated to be similar to that of construction during the decommissioning phase of the Proposed Development. An updated telecommunications and utilities search will be undertaken prior to any decommissioning works to appropriately identify and protect any infrastructure installed during the operation and maintenance phase of the Proposed Development.
- 8.13.25 Following the implementation of the mitigation measures outlined above, the Proposed Development is not expected to have any adverse impacts on telecommunications or utilities. In agreement with the Planning Inspectorate, Telecommunications and Utilities is, therefore, scoped out of further assessment.
- 8.13.26 Overall, with the embedded mitigation implemented, the effect of the Proposed Development on Telecommunications and Utilities is not significant. Therefore, the Proposed Development is in accordance with the relevant national and local policies.

### Major Accidents and Disasters

- 8.13.27 This section of the Planning Statement reviews the Proposed Development in the context of the planning policy for Major Accidents and Disasters. This section should be read in conjunction with **ES Volume 2, Chapter 16: Other Environmental Topics [EN0110020/APP/6.16]** and the **Policy Compliance Document [EN0110020/APP/5.5]**.
- 8.13.28 The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 require assessment of the potential effects of the Proposed Development on the environment as a result of the vulnerability of the Proposed Development to risks of major accidents or disasters which are relevant to the Proposed Development.
- 8.13.29 NPS EN-1 and EN-3 set out safety elements in relation to nationally significant infrastructure projects. However, National Planning Policy Framework (2024) is of more relevance.
- 8.13.30 The National Planning Policy Framework (2024) notes at paragraph 102 that *“Planning policies and decisions should promote public safety and take into account wider security and defence requirements by: a) anticipating and addressing possible malicious threats and natural hazards... This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security”*.
- 8.13.31 **ES Chapter 16: Other Environmental Topics [EN0110020/APP/6.16]** considers a number of potential major accidents and disasters including those listed as part of ISEP (formerly IEMA guidance) definitions for both Major Accidents and Disasters which are as follows:
- Major Accidents: Events that threaten immediate or delayed serious environmental effects to human health, welfare and/or the environment and require the use of resources beyond those of the client or its appointed representatives to manage. Whilst malicious intent is not accidental, the outcome (e.g. train derailment) may be the same and therefore many mitigation measures will apply to both deliberate and accidental events.
  - Disasters: May be a natural hazard (e.g. earthquake) or a man-made/external hazard (e.g. act of terrorism) with the potential to cause an event or situation that meets the definition of a major accident.
- 8.13.32 **ES Volume 2, Chapter 16: Other Environmental Topics [EN0110020/APP/6.16]** notes that a number of embedded mitigation measures relevant to Major Accidents and Disasters have been identified and considered as part of the assessment. These measures are included within **ES Volume 3, Appendix 2.4: Commitments Register [EN0110020/APP/6.20]**, **Outline Construction Environmental Management Plan [EN0110020/APP/5.9]**, **Outline Operational Environmental Management Plan [EN0110020/APP/5.10]** and **Outline Decommissioning Environmental Management Plan [EN0110020/APP/5.11]**. These management plans will become detailed and implemented at the various phases of the Proposed Development as per the requirements in the **draft DCO [EN0110020/APP/3.1]**.
- 8.13.33 Additionally, an **Outline Battery Storage Safety Management Plan [EN0110020/APP/5.15]** has been prepared for the Proposed Development. The proposed design for fire mitigation includes the BESS containers being fitted with thermal monitoring, battery cooling systems, remote and local emergency stops, fire detection, and fire suppression equipment.

- 8.13.34 As noted in section 8.11 above, with regard to aviation safety, the assessment of effects set out in **ES Volume 2, Chapter 16: Other Environmental Topics [EN0110020/APP/6.16]** and **ES Volume 3, Appendix 16.2: Glint and Glare Report [EN0110020/APP/6.20]** notes that there are no significant effects predicted in respect of aviation receptors during the Proposed Development. As such, there are no significant effects relating to major accidents and disasters with regard to aviation accidents.
- 8.13.35 In summary, the Proposed Development is unlikely to pose a significant risk to the safety of the public from major accidents and disasters. Therefore, the Proposed Development is in accordance with the relevant policies.

### Electromagnetic Fields

- 8.13.36 This section of the Planning Statement reviews the Proposed Development in the context of the planning policy for Electromagnetic Fields. This section should be read in conjunction with **ES Volume 2, Chapter 16: Other Environmental Topics [EN0110020/APP/6.16]** and the **Policy Compliance Document [EN0110020/APP/5.5]**.
- 8.13.37 NPS EN-1 makes reference to electromagnetic fields at paragraph 4.11.4 by stating “...*consideration of development near communication, navigation and surveillance (CNS) infrastructure should taken into account statutory technical safeguarding zones... and the potential for energy development, and/or its supporting infrastructure, to produce electro-magnetic and electrical noise interference which may degrade the capability or operation of defence CNS infrastructure*”. This is followed on by EN-5 which between paragraphs 2.9.45 and 2.9.59 discusses electric and magnetic fields in relation to electricity infrastructure.
- 8.13.38 Paragraph 2.9.47 of EN-5 notes “*All overhead power lines produce EMFs. These tend to be highest directly under a line and decrease to the sides at increasing distance. Although putting cables underground eliminates the electric field, they still produce magnetic fields, which are highest directly above the cable. EMFs can have both direct and indirect effects on human health, aquatic and terrestrial organisms*”.
- 8.13.39 As set in **ES Volume 1, Chapter 5: The Proposed Development [EN0110020/APP/6.5]**, cabling associated with the Proposed Development will be laid underground, rather than overhead power lines. The width of cable trenches will vary depending on the detailed design.
- 8.13.40 While the Proposed Development will utilise underground cabling that eliminates the electric field altogether as it is screened out by the sheath around the cable, there is still a potential for these cables to produce electromagnetic fields. However, from the assessment produced in section 16.6 of **ES Volume 2, Chapter 16: Other Environmental Topics [EN0110020/APP/6.16]** there is deemed to be no significant effects from the Proposed Development upon electromagnetic fields.

## 8.14 Cumulative Effects

- 8.14.1 This section reviews the Proposed Development in the context of planning policy for cumulative effects. This section should be read in conjunction with the **Policy Compliance Document [EN0110020/APP/5.5]**.

- 8.14.2 **ES Chapter 17: Cumulative Effects [EN0110020/APP/6.17]** presents a Cumulative Effects Assessment (CEA), considering two types of cumulative effects, including the intra-project effects and inter-project effects.
- 8.14.3 Paragraph 4.1.5 of NPS EN-1 confirms that in weighing up the impacts and benefits of a proposed development, the Secretary of State will also need to take into account:

*“Its potential benefits including its contribution to meeting the need for the Clean Power 2030 Mission and net zero, energy infrastructure, job creation, reduction of geographical disparities, environmental enhancements, and any long-term or wider benefits;*

*Its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy”.*

- 8.14.4 Paragraph 2.10.18 of NPS EN-3 notes that *“applicants should consider the cumulative impacts of situating a solar farm in proximity to other energy generating stations and infrastructure”.*

### Intra-Project Effects Assessment

- 8.14.5 In terms of Intra-related effects, consideration of the receptors against which the Intra-project assessment has been undertaken for effects is presented within **ES Volume 2, Chapter 17: Cumulative Effects [EN0110020/APP/6.17]**. This indicates that the effects arising from the Proposed Development in isolation that are deemed not significant, would not in combination give rise to significant environmental effects.
- 8.14.6 As demonstrated through the assessment in the ES, there are both construction and decommissioning effects assessed in Table 17.6 of **ES Volume 2, Chapter 17: Cumulative Effects [EN0110020/APP/6.17]** and Table 17.7 for operational intra-related effects.
- 8.14.7 In terms of construction and decommissioning the significant environmental effects identified by the Proposed Development in isolation, these are focused around Landscape and Visual, Socio-Economics, Tourism and Recreation and Land Use.
- 8.14.8 Regarding Landscape and Visual, the effects are –
- A significant visual impact has been identified viewpoints representative of residential properties and human health during construction but given that embedded mitigation measures prevent additional significant impacts from noise, traffic and transport, and air quality, no significant intra-project effects are anticipated.
  - A significant visual impact has been identified for viewpoints representative of Public Rights of Way during the construction phase but given that embedded mitigation measures prevent additional significant impacts from traffic and transport, recreation, and air quality (on human health), no significant intra-project effects are anticipated.
- 8.14.9 In terms of Socio-Economics, a significant impact on Best and Most Versatile (BMV) land is identified but given that changes to the soil quality and compaction are not significant, no significant intra-project effects are anticipated.

8.14.10 In addition to construction and decommissioning, there are also significant intra-related effect interactions once the Proposed Development is Operational. The operational interactions are focused around landscape and visual. These effects are –

- A significant visual impact has been identified viewpoints representative of residential properties and human health during the operation and maintenance phase but given that embedded mitigation measures prevent additional significant impacts from noise, contamination, and glint and glare, no significant intra-project effects are anticipated.
- A significant visual impact has been identified for viewpoints representative of Public Rights of Way during operation but given that embedded mitigation measures prevent additional significant impacts on recreation, no significant intra-project effects are anticipated.

### Inter-Project Effects Assessment

8.14.11 In addition to Intra-related project effects, there are also inter-related project effects and this is assessed within the **ES Volume 2, Chapter 17: Cumulative Effects [EN0110020/APP/6.17]**. The Applicant has assessed the relationship between the Proposed Development and neighbouring applications. As indicated in the ES, each of the Other Developments were considered in respect of the aspects with regard to any overlap in temporal scope; the scale and nature of development and the potential effects of the Proposed Development along with embedded environmental measures.

8.14.12 The Applicant has demonstrated that all potentially significant cumulative effects of the Proposed Development have been identified, thoroughly assessed and clearly presented, ensuring that the cumulative environmental implications are fully understood and transparently communicated.

# 9 CONCLUSION AND PLANNING BALANCE

## 9.1 Introduction

- 9.1.1 This section considers the conclusions of the earlier sections in terms of the need for, and other benefits of the Proposed Development and weights this in the context of any harms identified and compliance with relevant national and local policy.
- 9.1.2 This Planning Statement sets out how the Proposed Development complies with the relevant planning policy and other matters that the Applicant considers to be both important and relevant to the Secretary of State's decision as to whether to grant development consent.

## 9.2 National Policy Statements

- 9.2.1 As confirmed earlier in this Planning Statement, the Application will be determined under Section 104 of the PA 2008 and the NPSs provide the primary basis for the Secretary of State's decision and the Application should be determined in accordance with them.
- 9.2.2 As set out in Section 6 of this Planning Statement, the relevant section, section 104(2) of the Planning Act 2008, requires that in deciding an application for development consent the Secretary of State must have regard to:
- a) Any relevant national planning statement;
  - b) The appropriate marine policy documents;
  - c) Local impact reports;
  - d) Prescribed matters; and
  - e) Any other matters which the Secretary of State thinks are both important and relevant to the Secretary of States decision.
- 9.2.3 In respect of part a) above, the National Policy Statements which have effect in relation to the Proposed Development include:
- EN-1 Overarching National Policy Statement for Energy;
  - EN-3 National Policy Statement for Renewable Energy Infrastructure; and
  - EN-5 National Policy Statement for Electricity Network Infrastructure.
- 9.2.4 In regard to point b) set out above, there are no relevant marine policy documents for the Proposed Development, and therefore the Secretary of State is not required to consider this matter further.
- 9.2.5 Regarding point c) which references the Local Impact Reports, these are expected to be submitted by the host authorities rather than the Applicant. However, it can be confirmed that the Proposed Development is in accordance with the relevant local policy, as set out in further detail in the **Policy Compliance Document [EN0110020/APP/5.5]**.

- 9.2.6 For point d) referenced above, it has been demonstrated that a decision to grant a DCO for the Proposed Development would have regard to the matters prescribed by Regulation 3 and 7 of the Infrastructure Planning (Decisions) Regulations 2010 (as amended). The Proposed Development has had regard to preserving heritage assets and their setting as set out in **ES Volume 2, Chapter 8: Cultural Heritage and Archaeology [EN0110020/APP/6.8]**. Regarding biodiversity enhancements, this is set out in greater detail within **ES Volume Chapter 6: Biodiversity and Nature Conservation [EN0110020/APP/6.6]** and section 8 above.
- 9.2.7 Section 104(3) of the PA 2008 requires that applications for development consent must be determined by the SoS in accordance with any relevant national policy statement except to the extent that one or more of subsections 104(4) to 104(8) apply. None of these limited exceptions set out in subsections 104(4) to 104(8) of Planning Act 2008 are engaged in relation to this Proposed Development for the reasons set out below.
- 9.2.8 Section 104(4) applies when decisions are being made on an application in accordance with any relevant national policy which would lead to the UK being in breach of any of its international obligation. It can be confirmed that there is no evidence to suggest that the granting of the DCO for the Proposed Development would lead to the UK being in breach of any of its international obligations.
- 9.2.9 Section 104(5) applies if deciding an application in accordance with any relevant national policy would lead to the SoS being in breach of any duty imposed on the SoS by or under any enactment. There is no evidence to suggest that the granting of the DCO for the Proposed Development would lead the SoS to be in breach of any such duty.
- 9.2.10 Section 104(6) applies if deciding an application in accordance with any relevant national policy would be unlawful by virtue of any enactment. There is no evidence to suggest that the granting of the DCO for the Proposed Development would be unlawful by virtue of any enactment.
- 9.2.11 Section 104(7) applies if the adverse impact of a proposed development would outweigh its benefits. Section 8, including all subsections, of this Planning Statement sets out how the Proposed Development is in accordance with EN-1, EN-3 and EN-5 and relevant local policy. The overall planning balance of the Proposed Development is considered below. The limited adverse impacts of the Proposed Development are not considered to outweigh its substantial benefits.
- 9.2.12 Finally, section 104(8) applies if any condition prescribed for deciding an application otherwise in accordance with a NPS is met. There is no evidence to suggest that any condition is met in relation to the Proposed Development.
- 9.2.13 At the centre of the policy and framework delivered within NPS EN-1, NPS EN-3 and NPS EN-5 is the legally binding requirement for the UK to achieve Net Zero by 2050. Net Zero by 2050 is the ultimate target but the target milestones ahead of that are perhaps even more critical as they establish the pathway to ensure that Net Zero is achievable. Section 3 of the **Statement of Need [EN0110020/APP/5.8]** sets out the wider policy context and the progress which is being made towards the targets. Critically, it shows that urgent action is required to meet the 2030 and 2035 emissions targets and illustrates the urgency of need for low carbon generating infrastructure such as the Proposed Development and the timeframe in which it is able to start contributing to the national energy supply.
- 9.2.14 Above section 8 of this Planning Statement, alongside the **Policy Compliance Document [EN0110020/APP/5.5]** have considered the Proposed Development

and its potential impacts against the detailed policy criteria which is set out within NPS EN-1, NPS EN-3 and NPS EN-5.

9.2.15 The **Environmental Statement [EN0110020/APP/6.1 – 6.20]** provides a robust assessment of the potential impacts of the Proposed Development and finds that there are limited significant adverse residual effects remaining after mitigation, the receptors with residual significant adverse effect are:

- Habitat Loss to LWS from construction / decommissioning activities
- Habitat Loss of priority habitat as a result of construction / decommissioning activities within the Order Limits
- Disturbance and/or harm to priority habitats from construction / decommissioning activities
- Temporary change to landscape Character of LCA 8 within Order Limits result of construction / decommissioning activities
- Temporary change to landscape Character of LCA A1 within Order Limits result of construction / decommissioning activities
- Construction / decommissioning activity and equipment within view (Viewpoints 4, 35, 37, 39, 40, 44, 47, 48, 59, and 60), ranging from immediate to mid-view impacts

9.2.16 Significant beneficial effects are likely to be felt by receptors in relation to the following elements:

- Enhancement of habitat in Brampton Common LWS
- Enhancement of priority habitats (Native Hedgerow and Wet Woodland)
- Enhancement of habitat for Priority Species (Bat and Reptile)
- Enhancement of habitat for Breeding Birds
- Enhancement of habitat for Barn Owl
- Enhancement of habitat for Hobby
- Year 1 changes to Landscape Character as a result of the Proposed Development (LCA A1 and LCA 8)
- Year 15 changes to Landscape Character as a result of the Proposed Development (LCA A1 and LCA 8)
- Year 1 changes to views due to components of the Proposed Development (Viewpoints 35, 40, and 48)
- Year 1 changes to views due to components of the Proposed Development (Viewpoints 4, 37, 39, 44, 47, 59, and 60)
- Year 15 changes to views due to components of the Proposed Development (Viewpoints 4, 35, 40, 44, and 47)
- Displacement of GHG emissions over the lifespan of the Development by the production of renewable energy.

9.2.17 As noted within NPS EN-1 paragraphs 3.2.8 – 3.2.10, the Secretary of State has determined that there is a need for projects of this type and therefore the Proposed Development should be given substantial weight in terms of their contribution to the urgent demonstrated need.

- 9.2.18 Section 4.3 of this Planning Statement sets out the benefits that will be delivered by the Proposed Development should consent be granted. In addition to the generation of a significant quantity of low carbon energy which makes a meaningful contribution to the UK's legally binding net zero commitment and is a source of domestic energy security that limits UK consumers exposure to volatile energy prices, the Proposed Development will also deliver:
- The provision of battery energy storage which will maximise efficiency of the land and grid capacity, as encouraged by NPS EN-3;
  - Ecological enhancement measures that will result in a secured commitment to deliver a biodiversity net gain of 29% for habitat units, 40% for hedgerow units and 11% for watercourse units;
  - Significant new habitat creation through new tree and hedgerow planting;
  - Creation of jobs during all three phases of the Proposed Development, including construction, operation and maintenance and decommissioning;
  - Provision of an **outline Skills and Supply Chain Management Plan [EN0110020/APP/5.18]** which will:
    - Increase direct and indirect employment and opportunities;
    - Leverage potential of the Proposed Development and other similar schemes in the local area, to encourage the next generation to take up careers in the renewable energy sector;
    - Engage effectively with local businesses and wider supply chain; and
    - Assist in development and dissemination of local knowledge and skills relating to renewable energy infrastructure.
- 9.2.19 The combined nature of these additional benefits is considered to carry substantial weight in favour of the Proposed Development.

## 9.3 The Planning Balance

- 9.3.1 The Applicant set out with the objective to deliver a significant quantity of renewable energy, of NSIP scale, to the National Grid and to contribute to the UK's wider decarbonisation of energy supply. Through the careful selection of an appropriate site which benefits from suitable topography and irradiance and a connection to the National Grid through to the detailed design measures, the Applicant has developed a proposal which is sensitive to local context.
- 9.3.2 Paragraph 3.2.8 of EN-1 states that the SoS "*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....*" Paragraph 3.2.9 goes on to state that "*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*".
- 9.3.3 Paragraph 4.1.3 of EN-1 states that "*given the level and urgency of need for infrastructure of the types covered by the energy NPSs set out in Part 3 of this NPS, the Secretary of State will start with a presumption in favour of granting consent to applications for energy NSIPs*".

- 9.3.4 Paragraph 3.3.62 and 4.2.16 of EN-1 both state that the government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. Paragraph 4.2.17 confirms that solar development falls within the category of CNP by stating that low carbon infrastructure for the purposes of that policy means all onshore and offshore electricity generation that does not involve fossil fuel combustion.
- 9.3.5 Paragraph 3.3.63 of EN-1 notes that “*subject to any legal requirements, the urgent need for CNP infrastructure to achieving our 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. Government strongly supports the delivery of CNP infrastructure and it should be progressed as quickly as possible*”.
- 9.3.6 The policy landscape set by the NPSs EN-1, EN-3 and EN-5 illustrates the Government's position in a very clear way and confirms that the principle of the development is not just accepted, it is of critical importance and priority at a national level. This landscape paves the way for well-considered projects to receive favourable recommendations from the Planning Inspectorate and an eventual grant of consent by the Secretary of State. However, despite the strength of the policy it does not immediately imply that all proposals for such infrastructure will receive approval. There are a number of tests and justification required to be demonstrated by the Applicant as to why a chosen site is an appropriate location for the proposed infrastructure and that any adverse environmental impacts have been mitigated as far as practicable with the application of the mitigation hierarchy. NPS EN-1 also places significant emphasis on the importance of good design throughout the Nationally Significant Infrastructure Project process. This means more than sensitive siting of infrastructure and includes consistent decision making based on sound environmentally led principles.
- 9.3.7 Good design has been embedded into the Proposed Development process from the outset of the site selection process. In this context the first tier of the mitigation hierarchy, has been applied as there are no national landscape designations which would be impacted by the Proposed Development. At a site-specific level, a comprehensive mitigation package has been embedded into the design of the Proposed Development to date with further commitments made to minimise any likely significant impacts. Given the nature of the Proposed Development, the sensitivity of receptors and the existing local context mean that there are some impacts which cannot be mitigated. The Applicant considers given the acute need for the Proposed Development it has taken all reasonable measures to minimise these likely significant effects.
- 9.3.8 Paragraph 5.10.5 of EN-1 recognises that “*Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation*”. It is demonstrated throughout this Proposed Development that through the use of proposed mitigation there are beneficial landscape character impacts.
- 9.3.9 Regarding land use, the Applicant acknowledges that there will be approximately 1,311.28ha of BMV land that will be temporarily used for the purposes of accommodating Solar PV Development and associated infrastructure. As with landscape impact, the general nature of the type of land that lends itself to large scale solar development is rural and often in agricultural use. Nevertheless, the Applicant has sought to limit the amount of higher-grade agricultural land within the Site and once the Site was defined and the detailed characteristics of the soil

quality were understood, the Applicant sought to avoid the use of BMV, where possible.

- 9.3.10 The Applicant has also considered the impact of the use of agricultural land within the Order Limits on food security. There is no evidence to indicate that a change in agricultural output within the Order Limits could result in significant effects on local or national food production or security. As noted in the baseline, the UK's production to supply ratio is broadly stable, and in relation to cereals the UK now produces 90% of the products it consumes. Nevertheless, the Applicant's assessment confirms that the Proposed Development would result in a semi-permanent use of 2.5% of the available agricultural land in Rotherham and Doncaster, which would leave a remaining 97.5% reserved for food production, while some food production may be possible on the Proposed Development through sheep grazing. This should be given little negative weight in the planning balance, consistent with other recent Secretary of State decisions on solar NSIPs.
- 9.3.11 Paragraph 2.10.21 of EN-3 states that *"while land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of "Best and Most Versatile" agricultural land where possible"* Additionally, it is important to note that there is no planning policy which requires agricultural land to be farmed. Indeed, farmers are actively encouraged to take land out of arable use to help regenerate soil and combat the biodiversity crisis.
- 9.3.12 The land to be used will be used temporarily with the land being returned to arable use at the end of the Proposed Development's lifetime at decommissioning stage. Nevertheless, the Environmental Statement has confirmed that significant effects are likely to arise, and limited weight may be applied against the Proposed Development in the planning balance.
- 9.3.13 The Proposed Development makes a significant contribution towards the UK's solar targets for reaching Net Zero. The Applicant is well resourced and in a strong position to deliver the Proposed Development and within a timeframe that means the generation of low carbon energy will also occur in a timely manner and contribute to 2030 and 2035 pathway targets. As a project of Critical National Priority, the Proposed Development benefits from the strongest policy position set out in NPSs. EN-1 sets out a presumption in favour of energy related development. This Planning Statement confirms that the Proposed Development complies with EN-1, EN-3 EN-5, the NPPF and relevant local policy documents.
- 9.3.14 Where significant residual adverse effects have been identified, the Applicant has demonstrated its application of the mitigation hierarchy and careful consideration of design. As per paragraph 4.2.24 of EN-1, where impacts on landscape and visual receptors and soils and agricultural land which cannot be avoided, reduced or mitigated, the impacts will remain. Paragraph 4.2.25 of EN-1 sets out that *"the cumulative impacts of multiple developments with residual impacts should also be considered"*.
- 9.3.15 In the case of the Proposed Development, the residual significant adverse effects are limited to temporary effects on biodiversity, landscape and visual and socio-economic, tourism and recreation and land use. It is considered that these residual impacts do not meet the "exceptional circumstances" test and therefore do not warrant refusal. Further details on these can be found in **ES Volume 2, Chapter 18: Summary of Significant Effects [EN0110020/APP/6.18]**.

- 9.3.16 The Proposed Development does not have an unacceptable interference with human health and public safety, defence, irreplaceable habitats or pose an unacceptable risk to achievement of net zero. In addition, there are a significant number of additional benefits that would be achieved by the Proposed Development, as outlined above.
- 9.3.17 Whilst the Proposed Development results in development in the Green Belt, the Applicant has demonstrated that it has taken a careful and considered approach to the location of the development, recognising that the entire undeveloped parts of the Search Area fall within the Green Belt and therefore it cannot be avoided. The Applicant's position is that the land in the Order Limits meets the policy tests of grey belt, and that the Proposed Development is appropriate development within it, but even if this position is not accepted, there are Very Special Circumstances that clearly outweigh any harm identified in terms of the five Green Belt purposes. This is set out in further detail in the Green Belt assessment at Appendix 2 of this Planning Statement.
- 9.3.18 Taking all of the above into account, the balance is firmly in favour of approval. The Proposed Development is a well-considered and effectively designed proposal that responds and is sensitive to the local environment. It is therefore concluded that Development Consent should be granted.

### REFERENCES

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**WHITESTONE**  
solar farm

# **WHITESTONE SOLAR FARM**

## **Appendix 1: Site Selection Assessment**

## APPENDIX 1 – SITE SELECTION ASSESSMENT

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# 1 INTRODUCTION

## 1.1 Background

- 1.1.1 This Site Selection Report sets out the site selection process undertaken by the Applicant to identify the location of the Proposed Development, taking into consideration a range of planning, environmental and operational factors.
- 1.1.2 As explained later in this report, there is no legal or policy requirement to demonstrate that the Proposed Development is the best location for a solar farm; however, the Applicant must show that it is an appropriate location for a solar farm and there are certain policy preferences, for instance considering previously developed land before greenfield land and lower quality agricultural land before higher quality land in accordance with the National Policy Statements (EN-1 and EN-3) which have effect in relation to this application. This report explains the process undertaken by the Applicant in having regard to these important factors.
- 1.1.3 There are also certain legal and policy tests regarding the consideration of alternative sites, for instance where there would be an adverse effect on the integrity of a European protected site, which is not engaged in this case, or where land is proposed to be acquired compulsorily. In this case, the Applicant is aiming to secure the principal land parcels to deliver the solar farm by voluntary agreement, although compulsory acquisition is still being sought to ensure deliverability.

## 1.2 Proposed Development

- 1.2.1 This Proposed Development is defined as a Nationally Significant Infrastructure Project (NSIP) and will require a Development Consent Order (DCO) from the Secretary of State for Energy Security and Net Zero due to its generating capacity exceeding 100 megawatts (MW).
- 1.2.2 For a full description of the Proposed Development, see **ES Volume 1, Chapter 5: The Proposed Development [EN0110020/APP/6.5]**.
- 1.2.3 The location of the Order Limits is shown on the submitted **Location, Order Limits and Grid Coordinates Plan [EN0110020/APP/2.1]** and described in **ES Volume 1, Chapter 3: Site and Surrounding Area [EN0110020/APP/6.3]**.
- 1.2.4 Due to the scale of the Proposed Development being set across four administrative boundaries, comprising City of Doncaster (CDC), Rotherham Metropolitan Borough Council (RMBC), North East Derbyshire District Council (NEDDC) and Derbyshire County Council (DCC), for the purpose of Environmental Impact Assessment (EIA), the Site has been split into three distinct areas. These areas are referred to as:
- Whitestone 1 (W1);
  - Whitestone 2 (W2); and
  - Whitestone 3 (W3).

## 1.3 Purpose of this Report

- 1.3.1 This Report accordingly sets out the site selection process and alternative sites that were considered during this process, principally in accordance with the National Policy Statements EN-1, EN-3 and EN-5, which have effect in relation to the Proposed Development (including, for example, where alternatives are relevant in wider policies such as the policy to demonstrate why very special circumstances (VSC) exist to develop land in the Green Belt).
- 1.3.2 **ES Chapter 4: Alternatives and Design Evolution [EN0110020/APP/6.4] and the Design Approach Document [EN0110020/APP/5.7]** explains the legal and policy background to the considerations of alternatives and how the design has developed having regard to environmental considerations.
- 1.3.3 **The Planning Statement [EN0110020/APP/5.5]** to which this SSR is appended, explains the planning tests and policy background to the consideration of alternatives and the need for the project is explained within the **Statement of Need [EN0110020/APP/5.9]** and summarised below for general context.
- 1.3.4 **The Design Approach Document [EN0110020/APP/5.7]** discusses the ongoing evolution of the Proposed Development following the selection of the Site and demonstrates how it achieves good design. **The Design Approach Document [EN0110020/APP/5.7]** includes information on how the detailed selection of land parcels for solar, BESS and associated infrastructure have developed, considering key environmental and planning considerations.

## 2 ASSESSMENT METHODOLOGY

### 2.1 Overview

- 2.1.1 There is no standard methodology for the site selection of solar farms. The site selection methodology has therefore been informed by the relevant planning policies and associated guidance.
- 2.1.2 The assessment has been informed by the following relevant national and local policies, including –
- Overarching National Policy Statement for Energy 2025 (NPS EN-1) (designated in January 2026);
  - National Policy Statement for Renewable Energy Infrastructure 2025 (NPS EN-3) (designated in January 2026);
  - National Policy Statement for Electricity Networks Infrastructure 2025 (NPS EN-5) (designated in January 2026);
  - National Planning Policy Framework (NPPF) (2024) updated in February 2025;
  - Rotherham Metropolitan Borough Council (RMBC) Local Plan 2013 - 2028 (adopted September 2014);
  - City of Doncaster (CoD) Local Plan 2015 – 2035 (adopted September 2021); and
  - Northeast Derbyshire District Council (NEDDC) Local Plan 2014 – 2034 (adopted November 2021).
- 2.1.3 It should be noted that Derbyshire County Council (DCC) do not hold an individual local plan but defer to the District Councils who deal with the local planning policy.
- 2.1.4 NPS EN-1, NPS EN-3 and NPS EN-5 all have effect in relation to the Secretary of State's (SoS) decision making in relation to the Proposed Development and are therefore the primary policy basis for the SoS's determination of the Application and contain the principal policies of relevance to the site selection process. The policies within the NPPF and local plans associated with RMBC, CoD and NEDDC are considered important and relevant to the SoS's decision, although it is noted that as stated in NPS EN-1 at paragraph 4.1.16 that, "*in the event of a conflict between these documents and an NPS, the NPS prevails for the purpose of Secretary of State decision making given the national significance of the infrastructure*". Further information on the role and status of relevant planning policy is provided within the **Planning Statement [EN0110020/APP/5.5]**.
- 2.1.5 There are also tests as outlined in the relevant NPSs with regard to the consideration of alternative sites, for instance where there would be an adverse effect on the integrity of a European protected site or where land and / or rights are proposed to be acquired compulsorily. These are outlined and addressed in section 3 below.
- 2.1.6 The assessment methodology has been split into four stages which follow a logical and sequential approach. The four stages include –
- Stage 1 – Identification of Search Area;
  - Stage 2 – Exclusion of Planning, Environmental and Spatial Constraints;

- Stage 3 – Identifying Potential Solar Development Areas; and
- Stage 4 – The Proposed Development.

## 2.2 Relevant Considerations from Recent Solar NSIP Decisions

2.2.1 As will be explained in paragraph 4.3.8 of this document, the starting point for the Search Area was the identification of a suitably sized grid connection at the existing National Grid Brinsworth Substation. Recent Solar NSIP decisions, alongside paragraph 2.10.17 of EN-3, have confirmed that the Examining Authority (ExA) and SoS support this approach to site selection. This is highlighted in the following extracts from the ExA’s Recommendation Reports and SoS Decision Letter for three recently consented projects.

### Mallard Pass Solar Farm

2.2.2 Paragraph 3.2.128 of the Mallard Pass Solar Farm Examining Authority’s Recommendation Report dated 16 February 2024 states -

*“The ExA is satisfied that the availability of the grid connection at Ryhall is a significant factor in the site selection process and that there are no other realistic alternatives that would meet the same objectives of the Proposed Development”.*

2.2.3 This is reiterated at paragraph 4.6.5 of the Mallard Pass Solar Farm Secretary of State’s Decision Letter dated 12 July 2024.

### Sunnica Energy Farm

2.2.4 Paragraph 4.155 of the Sunnica Energy Farm Secretary of State’s Decision Letter dated 12 July 2024, which includes references from the Sunnica Energy Farm Examining Authority’s Recommendation Report dated 28 June 2023 states:

*“With regards to the Applicant’s methodology, the Secretary of State notes that the Applicant undertook a thorough four-stage site selection process [ER 4.6.26 et seq.] and the chosen site was considered due to the high levels of solar irradiation compared to other parts of the UK, the availability of predominately large open flat land, as well as a suitable connection point to the National Grid, the land not being located in or near to Areas of Outstanding Natural Beauty, and its ability to avoid direct physical impact on designated heritage assets [ER 4.6.29]... The Secretary of State is therefore satisfied that the site selection process undertaken by the Applicant was appropriate, as set out in NPS EN-3, which notes that grid connection capacity and access will be a major factor in site selection [ER 3.2.15].”*

### West Burton Solar Farm

2.2.5 Paragraph 3.2.116 of the West Burton Solar Farm ExA’s Recommendation Report dated 8 August 2024 states that –

*“The ExA considered that the Applicant had adequately explained the site selection methodology and it was reasonable to use the PoC as a starting point and to seek to maximise the grid connection opportunity that had been secured here”.*

2.2.6 This was further reiterated at paragraph 4.41 of the West Burton Solar Farm Secretary of State’s Decision Letter dated 24 January 2025.

## 3 PLANNING POLICY

### 3.1 National Planning Policy

#### Overarching National Policy Statement for Energy (EN-1)

- 3.1.1 The compliance of the Proposed Development with planning policy is set out in the main body of the Planning Statement, notably, Chapter 3, to which this Site Selection Report is an Appendix. This section sets out the policy from EN-1 and EN-3 that is relevant to the consideration of matters relating to site selection.
- 3.1.2 There is a strong relationship between the site selection and consideration of alternatives. Site selection sets out the process which an applicant has followed to determine the appropriate location for a proposed development. It should demonstrate a trail of logical steps followed to determine a location that will deliver the objectives of the project. These steps, as set out in paragraph 2.1.6 of this appendix, are normally driven by several technical and environmentally led criteria, to demonstrate that the location is able to accommodate functional requirements and has also been subject to robust consideration of environmental constraints and has sought to avoid areas of highest sensitivity.
- 3.1.3 The application of these steps will generally lead to a number of options, or sometimes alternative sites, which an applicant will then consider and determine a favoured option to pursue. In this regard, paragraph 4.3.9 of NPS EN-1 states that *“this NPS does not contain any general requirement to consider alternatives or to establish whether the proposed project represents the best option from a policy perspective”*. Importantly, paragraph 4.3.24 confirms that *“The Secretary of State should not refuse an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site, and should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals”*.
- 3.1.4 However, EN-1 at paragraph 4.3.15 states that *“Applicants are obliged to include information about the reasonable alternatives they have studied in their ES. This should include an indication of the main reasons for the applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility.”* **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN0110020/APP/6.4]** addresses the matter of alternatives from an EIA Regulations compliance perspective but also provides consideration against NPS policy, where considered relevant.
- 3.1.5 The consideration of alternative sites (or locations as appropriate) and ways of meeting the identified project need is therefore an implicit part of the site selection process. This section therefore identifies policies which are relevant to both alternatives and site selection but recognises that each are subject to their own considerations and policy compliance requirements.
- 3.1.6 EN-1 paragraph 4.3.16 also notes that there are certain times in which the policy does require the consideration of alternatives. This is further set out within Sections 4.3, 5.2, 5.4, 5.8 and 5.10 of NPS EN-1.
- 3.1.7 The circumstances relating to when the consideration of alternatives is required and the Applicant’s response to these circumstances is set out below –

- Where a scheme would involve the compulsory acquisition of land or interests in land (EN-1 paragraph 4.3.9). In this case, the Applicant is aiming to secure the principal land parcels to deliver the solar farm by voluntary agreement, although compulsory acquisition powers are still being sought to ensure deliverability. Please see the **Statement of Reasons [EN0110020/APP/4.1]**.
- Where a scheme would be located near a sensitive receptor site for air quality (EN-1 paragraph 5.2.7). The Proposed Development is partly located within the Rotherham Air Quality Management Area (AQMA) 1 – Part 1 (NO<sub>2</sub>) at the northwest section of the Site. To reduce any potential interaction between the Proposed Development and the AQMA various mitigation measures have been considered and are reported in **ES Volume 2, Chapter 12: Air Quality [EN0110020/APP/6.12]**.
- Where a scheme would lead to significant harm to biodiversity and geological conservation interests (EN-1 section 5.4). The Proposed Development would not likely give rise to significant harm on such receptors, as reported in **ES Volume 2, Chapter 6: Biodiversity and Nature Conservation [EN0110020/APP/6.6]**, **ES Volume 2, Chapter 9: Ground Conditions and Land Quality [EN0110020/APP/6.9]** and **ES Volume 2, Chapter 10: Water Resources and Flood Risk [EN0110020/APP/6.10]**.
- Where a scheme would result in an adverse effect on the integrity of a European site that cannot be avoided (EN-1 section 5.4.4). The Proposed Development does not fall within a European site protected by the Habitat Regulations and is sufficiently far from designated sites that no impact pathways have been identified which would result in an impact on integrity, and therefore no further assessment of this is required. Further information is reported in **ES Volume 2, Chapter 6: Biodiversity and Nature Conservation [EN0110020/APP/6.6]**.
- Where a development would be located within, or partially within, Flood Zone 2 or Flood Zone 3 (NPS EN-1 section 5.8). In this case the Sequential Test should be undertaken. If following application of the Sequential Test, it is not possible for the project to be located in areas of lower flood risk the Exception Test can be applied, which provides a method of allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available. With regard to applying the Sequential Test, paragraph 5.8.23 of EN-1 sets out that consideration of alternative sites should take account of the policy on alternatives described in section 4.3 of EN-1. The majority of the Order limits are within Flood Zone 1, with a small proportion of land located within Flood Zones 2 and 3. The **ES Volume 3, Appendix 10.3: Flood Risk Assessment Appendix [EN0110020/APP/6.20]** and **ES Volume 2, Chapter 10: Water Resources and Flood Risk [EN0110020/APP/6.10]** advises how the Sequential Test has been met. However, it should be noted that where there are areas of flood zones 2 and 3, no sensitive electrical infrastructure has been placed within these areas, only solar panels and mitigation.
- Where a development would be located within a National Park, the Broads or a National Landscape (EN-1 Section 5.10). The Proposed Development is not located in or near any designations, therefore no further consideration of alternatives in this regard is required.

3.1.8 Paragraph 4.3.22 of NPS EN-1 advises that, in considering alternatives, the SoS should be guided by the following principles –

*“The consideration of alternatives in order to comply with policy requirements should be carried out in a proportionate manner; and*

*Only alternatives that can meet the objectives of the proposed development need to be considered”.*

### National Policy Statement for Renewable Energy Infrastructure (EN-3)

3.1.9 EN-3 provides technology specific policy in relation to solar PV development which includes guidance on site selection matters. These matters are dealt with in greater detail in Section 4 of this report; however, the context of the policy is summarised here.

3.1.10 Section 2.3 of NPS EN-3 sets out some important overarching principles to site selection for renewable energy generation generally:

- The specific criteria considered by applicants and the weight they give to them will vary from project to project (paragraph 2.3.2).
- The choices which applicants make in selecting sites reflect their assessment of the risk that the Secretary of State, following the general points set out in Section 4.1 of EN-1, will not grant consent in any given case (paragraph 2.3.4).
- It is for applicants to decide what applications to bring forward. In general, the government does not seek to direct applicants to particular sites for renewable energy infrastructure (paragraph 2.3.5).
- As most renewable energy resources can only be developed where the resource exists and where economically feasible, and because there are no limits on the need established in Part 3 of EN-1, the Secretary of State should not use a consecutive approach in the consideration of renewable energy projects (paragraph 2.3.9).

3.1.11 Section 2.10 of NPS EN-3 then relates specifically to Solar Photovoltaic generation, including factors influencing site selection, and notes that *“the government is committed to working with industry to radically increase our existing solar capacity by 2030 to boost growth across the country....”*

3.1.12 EN-3 sets out that there are a number of factors which are likely to influence site selection, with paragraph 2.10.10 stating –

*“The key considerations involved in the siting of a solar farm are likely to be influenced by factors set out in the following paragraphs, in addition to considerations specific to individual projects”.*

3.1.13 The specific factors are set out within paragraphs 2.10.10 to 2.10.40 which include:

- Irradiance and site topography;
- Network connection;
- Proximity of a site to dwellings;
- Agricultural land classification and land type;
- Accessibility;
- Public rights of way; and

- Security and lighting.

3.1.14 Policy 2.10.21 of NPS EN-3 states with regard to agricultural land as a factor influencing site selection that:

*“While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of “Best and Most Versatile” agricultural land where possible. ‘Best and Most Versatile agricultural land is defined as land in grades 1, 2 and 3a of the Agricultural Land Classification.”*

3.1.15 The above principles are effective provisions in terms of scoping the assessment; although, as previously stated, it is important to note that there is no statutory or specific planning policy requirement to consider alternative sites in relation to the development of best and most versatile (BMV) agricultural land in EN-1 or other planning policy documents.

### National Policy Statement for Electricity Networks Infrastructure (EN-5)

3.1.16 EN-5 provides the primary policy for decisions regarding electricity networks infrastructure. Paragraph 1.6.3 states *“other kinds of electricity infrastructure (including...underground...and associated infrastructure as referred to above) will only be subject to the 2008 Act – and so be covered by this NPS – in the following circumstances:*

- *If it constitutes associated development for which consent is sought along with an NSIP...”*

3.1.17 NPS EN-5 (paragraph 2.2.2) recognises that siting of new electricity networks infrastructure will be determined by:

- The location of new generating stations or other infrastructure requiring connection to the network, and/or
- System capacity and resilience requirements determined by the NESO.

3.1.18 Paragraph 2.2.7 then goes on to recognise that *“The connection between the initiating and terminating points of a proposed new electricity line will often not be via the most direct route. Siting constraints, such as engineering, environmental or community considerations will be important in determining a feasible route.”* and paragraph 2.2.8 that: *“There will usually be a degree of flexibility in the location of the development’s associated infrastructure such as substations, and applicants should consider carefully their location, as well as their design.”*

3.1.19 The approach to locating elements of the scheme, including siting of substations and other above-ground infrastructure is provided in the **Design Approach Document [EN0110020/APP/5.7]**. This Site Selection Assessment however provides the overall rationale for locating the site where it is, having regard to grid connection and capacity in the network to enable the electricity generated by the Proposed Development to be connected to the national grid.

### National Planning Policy Framework (NPPF)

3.1.20 The National Planning Policy Framework (NPPF) was published in March 2012 and most recently updated in February 2025. The government consulted on further changes to the NPPF between December 2025 and March 2026 which

sought to clarify policy on decision-making. There were a number of changes within the draft NPPF which have regard to both Green Belt and Nationally Significant Infrastructure Projects which are addressed in the **Policy Compliance Document [EN0110020/APP/5.6]**.

- 3.1.21 The NPPF sets out the Government's planning policies for England and how these are to be applied including in respect of the development of agricultural land and renewable energy. The NPPF does not contain specific policies for NSIPs and therefore does not have direct effect in relation to the Proposed Development however it may be a relevant matter in the SoS's decision making (as per paragraph 5 of the NPPF).
- 3.1.22 Paragraph 187 of the NPPF states that local planning authorities should balance the economic and other benefits of BMV agricultural land. Furthermore, where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek developers to use areas of poorer quality land in preference as opposed to that of a higher quality. Whilst this provides some context, the approach to site selection has been led by the policy on agricultural land in NPS EN-3.
- 3.1.23 Paragraph 161 of the NPPF states that *"the planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks 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"*.
- 3.1.24 Paragraph 168 of the NPPF continues on to discuss that, local planning authorities should not require applicants to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future.

### National Planning Practice Guidance (NPPG)

- 3.1.25 The policies contained within the NPPF are expanded upon and supported by the National Planning Practice Guidance (NPPG), which was originally published in March 2014 and has been updated periodically since. The most recent update to the NPPG was made in February 2024.
- 3.1.26 With regards to the location of solar farms, Paragraph 013 Reference ID: 5-013-20150327 cites the following factors that local planning authorities should consider. These factors include, but are not limited to –
- Encouraging the effective use of land by focussing large scale solar farms on previously developed and non-agricultural land, provided that it is not of high environmental value; and
  - Where a proposal involves greenfield land, whether (i) the proposed use of any agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land; and (ii) the proposal allows for continued agricultural use where applicable and/or encourages biodiversity improvements around arrays.
- 3.1.27 As is the case for the NPPF (refer paragraph 3.2.1 above), the NPPG does not contain specific guidance in relation to NSIPs and therefore does not have direct effect in relation to the Proposed Development however it may be a relevant matter in the SoS's decision making.

### The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the ‘EIA Regulations’)

- 3.1.28 Regulation 14(2)(d) of the EIA Regulations require that “a description of the reasonable alternatives studied by the applicant, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment” is presented in the ES. In compliance with the EIA regulations, a description of the alternatives considered by the Applicant has been fully described through **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN0110020/APP/6.4]**.

## 3.2 Local Planning Policy

- 3.2.1 The local plans associated with the City of Doncaster, Rotherham Metropolitan Borough Council and North East Derbyshire District Council do not have any policies which specifically address site selection.
- 3.2.2 However, the three Local Plans do demonstrate support towards renewable energy developments and extracts from these policies are set out in the below paragraphs.
- 3.2.3 The City of Doncaster Local Plan 2015 – 2035 provides support for energy generation projects which help increase the supply of low carbon and renewable energy generated in the borough. This is further explained within Policy 58: Low Carbon and Renewable Energy (strategic policy)
- 3.2.4 Rotherham Metropolitan Borough Council Local Plan 2013 – 2028 also demonstrates support for renewable and low carbon sources of energy at Policy CS30: Low Carbon and Renewable Energy Generation. The policy states –
- “Proposals for the development of renewable and low carbon sources of energy, particularly from community owned projects, will be encouraged provided that there are no unacceptable adverse effects on:*
- a) Residential living conditions, amenity and quality of life;*
  - b) Character and appearance of the landscape and surrounding area;*
  - c) Biodiversity, geodiversity and water quality;*
  - d) Historical, archaeological and cultural heritage assets;*
  - e) Highway safety and infrastructure”.*
- 3.2.5 North East Derbyshire District Council Local Plan 2014 – 2034 provides support for energy generation projects to assist in mitigating and adapting to Climate Change. Policy SDC10: Decentralised, Renewable and Low Carbon Energy Generation.
- 3.2.6 Finally, as discussed earlier in this document, Derbyshire County Council do not hold their own local policy plan and therefore defer to North East Derbyshire District Councils Local Plan as mentioned in paragraph 3.2.5 above.

## 4 SITE SELECTION ASSESSMENT

4.1.1 The assessment methodology used was split into four stages which follow a logical and robust approach.

- Stage 1 – Identification of Search Area;
- Stage 2 – Consideration of Planning, Environmental and Spatial Constraints within 12km Search Area;
- Stage 3 – Identifying Potential Solar Development Areas; and
- Stage 4 – Identifying the Proposed Development boundary.

### 4.2 Site Selection Principles

4.2.1 This section sets out the background and approach to the site selection process which the Applicant has undertaken and has resulted in the land that is the subject of the Proposed Development being brought forward.

4.2.2 The report should be read in conjunction with the **Statement of Need [EN0110020/APP/5.9]** which presents further detail on the need for the Proposed Development, its locational value and its contribution to meeting the UK's decarbonisation requirements.

4.2.3 In determining a suitable location for the Proposed Development, the Applicant sought to develop a single new Nationally Significant Infrastructure Project (NSIP) generating a minimum of 500 – 750MW which would:

- contribute to meeting the UK's urgent need for low carbon energy generation;
- be as close as possible to an available grid connection or part of the transmission network in which capacity exists as highlighted within discussions with National Grid;
- avoid impacts on sensitive landscapes and environments as far as practicable;
- be situated an appropriate distance from densely populated residential communities;
- as far as possible be located outside of Best and Most Versatile (BMV) Agricultural Land based on the information known at the time taken from Provisional Agricultural Land Classification (ALC) (England) Map produced by Natural England;
- predominantly be located outside of the Flood Zones, to ensure that more sensitive electrical infrastructure could be located outside of areas at risk of flooding;
- be readily accessible from existing strategic road network to facilitate construction access; and
- be delivered on land which could be acquired voluntarily thereby avoiding or minimising the need for large scale compulsory acquisition (and, in the case of BMV Agricultural Land, could potentially help identify the least productive areas of land using local knowledge from farmers).

4.2.4 It is generally acknowledged that large scale solar developments require three fundamental attributes. EN-3 identifies these core attributes, amongst other considerations, including -

- Existence of sufficient land to deliver the project and meet the scale of the Proposed Development's aims;
- Availability and capacity of a suitable point of connection to the National Electricity Transmission Systems (NETS); and
- Solar irradiation levels to support the development's potential to produce an efficient and economic energy yield.

4.2.5 The number of locations in the UK which satisfy all three of the core site selection attributes (land availability and suitability, feasible irradiation levels and grid connection availability) is limited.

4.2.6 It should therefore not be expected that large-scale solar is located only where irradiation is highest in the UK; nor only where suitable land is available; nor only in close proximity to existing grid substations with available capacity. Developments will be proposed in locations with the blend of characteristics which is assessed as suitable for each scheme, and each scheme may have unique features which are particular to its proposed location.

### 4.3 Stage 1 – Identification of Search Area

4.3.1 Stage 1 of the site selection process was the determination of an appropriate Search Area, as described below.

4.3.2 This was done in two sub-stages, firstly Stage 1A which was an application of the relevant factors outlined in EN-3 to identify both the region in which a NSIP development could be located and a point of connection which had capacity and would enable the electricity created by it to be exported to the National Grid. The relevant factors that influenced the site selection process at this stage comprised irradiance and topography, and grid connection. Stage 1A identified the South Yorkshire region as a suitable region in which to search for a site.

4.3.3 Stage 1B was then undertaken after the South Yorkshire region was identified as being generally suitable from a topographic and irradiance perspective and as having available grid capacity, to identify an appropriate Search Area. This was informed by a review of the remaining EN-3 considerations and other environmental and spatial constraints highlighted by the Applicant's expertise and knowledge of delivering similar projects.

4.3.4 These two sub-stages are set out in detail below.

#### Stage 1A – Search Area influencing factors

##### *Irradiance and topography*

4.3.5 NPS EN-3 notes that irradiance is a key consideration for site selection as the amount of electricity generated on site is directly affected by the irradiance levels. NPS EN-3 states that site irradiance and topography are key inputs to the site selection process, under paragraph 2.10.19, which states, "*Irradiance of a site will, in turn, be affected by surrounding topography, with an uncovered or exposed site of good elevation and favourable south-facing aspect more likely to increase year-round irradiance levels. This in turn affects the carbon emission savings and the commercial viability of the site*".

4.3.6 Solar irradiation within South Yorkshire is above the UK average and therefore makes it a suitable focus for large-scale solar development.

## APPENDIX 1 – SITE SELECTION ASSESSMENT

4.3.7 Irradiance within the Doncaster and Rotherham areas specifically is sufficiently high to support solar development which was a key consideration leading to the decision to focus on this local area of South Yorkshire. This is illustrated within Figure 1 below.

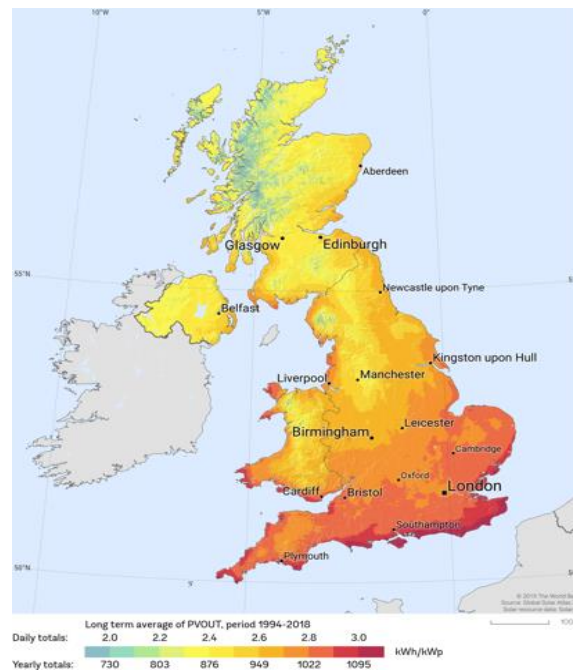


Figure 1 – Irradiance Levels within the UK

4.3.8 The combination of rolling topography and flatter land within the South Yorkshire Region created several locations with favourable levels of irradiation which influenced the focus on this area for the location of the Proposed Development.

4.3.9 In the absence of other guiding factors, the hierarchy of attractiveness of different topographical characteristics for solar farms is as follows:

- Level land - the easiest for construction and typically less visible from surrounding land.
- Southward sloping land - this has the highest levels of solar irradiation and can productively host the greatest amount of solar per hectare due to reduced inter-shading between rows.
- Eastward or westward sloping land.
- Northward sloping land - this may be practical if on a shallow gradient, but distances between rows of panels will be slightly greater to reduce overshading.

4.3.10 Across the UK, there are many areas with good irradiation and a connection to the grid that have limited availability of level ground, and tolerances for gradient will correspondingly vary.

4.3.11 Site Selection for the Proposed Development has used the hierarchy above, selecting more level ground where other criteria do not rule it out. For southward sloping land, gradients of up to 7% have typically been considered, with visibility from nearby residential areas a further consideration. For other orientations, lower maximum gradients were used.

### *Grid Connection and Capacity*

- 4.3.12 Following the identification to the South Yorkshire region as being generally favourable to locate a large-scale solar development, the Applicant commenced discussions with the (then) National Grid Electricity System Operator (NGESO), who identified Brinsworth Substation as having capacity to connect a large-scale development to the National Grid. Given the limited availability of connections into the NETS (which are necessary for the deployment of utility-scale solar), it is important that any available connection is used as efficiently as possible. This is confirmed by Ofgem’s Connections Reform plan, and NESO’s work to prioritise connections for 2030 while creating a robust pipeline of projects beyond 2030, consistent with the aims of the Clean Power 2030 Action Plan.
- 4.3.13 NGESO was the system operator for the NETS and the body within National Grid that made connection offers. The system operator changed to National Energy System Operator (NESO) on 1 October 2024. National Grid Electricity Transmission (NGET) operates as transmission owner and is the part of National Grid plc that is responsible for owning and operating the national electricity transmission network.
- 4.3.14 The engagement between the Applicant and NGESO resulted in the Applicant receiving a grid connection offer from NGESO on 26 January 2022, offering connection to the existing 275kV National Grid Brinsworth Substation. That offer was accepted by the Applicant on 10 March 2022.
- 4.3.15 The available grid connection to the existing Brinsworth 275kV substation was an important factor in the site selection for the Proposed Development. During the initial site selection process, it was intended that the Proposed Development was to connect to the existing Brinsworth 275kV substation. This substation is connected to an existing part of the NETS and had sufficient capacity to transmit the energy the Proposed Development would generate to consumers in South Yorkshire and beyond.
- 4.3.16 Since the initial offer was made to the Applicant in 2022, National Grid and NESO have progressed plans to build a new 400kV circuit from Brinsworth to Chesterfield and Chesterfield to High Marnham to bring offshore wind power generation to the Midlands and beyond as part of the Great Grid Upgrade. As a part of that work, they intend to build a new 400kV substation at Long Lane approximately 1km east of the existing Brinsworth substation which has been submitted to RMBC for approval (ref. RB2025/1468).
- 4.3.17 The Proposed Development is not the triggering party for the proposed upgrade but would connect to the upgraded infrastructure. It therefore remains a key benefit of the Proposed Development within the context of the significant need for new electricity networks infrastructure, that efficient use will be made of the capacity and the infrastructure in this location. The proximity to, and availability of capacity on the National Electricity Transmission System is key to the feasibility of solar farms and a driving factor for the chosen Order Limits.
- 4.3.18 Paragraph 2.10.25 of NPS EN-3 recognises that “*applicants may choose a site based on nearby available grid export capacity*” to “*maximise existing grid infrastructure, minimise disruption to existing local community infrastructure or biodiversity and reduce overall costs*”.
- 4.3.19 As this is included as a factor influencing site selection, policy recognises the importance of having an available connection in choosing a site, for instance to minimise the level of new grid connection infrastructure which needs to be built, and that having this ‘nearby’ can minimise impacts on the local community and

biodiversity and reduce costs of delivery (and thus increase certainty of delivery and the price for end consumers).

- 4.3.20 The Applicant has secured a connection agreement with NESO to export up to 750MW of electricity to the National Grid.

### Stage 1B – Other Factors

#### General considerations

- 4.3.21 Having identified the point of connection and secured a connection agreement, the Applicant assessed the environmental constraints in the local area, and operational considerations based on significant experience in the sector, to identify a suitable Search Area, which would be sufficiently large to identify an appropriate site which would adequately support an NSIP scale solar development. This Search Area rationale is further set out in the remainder of this appendix. However, in summary this Search Area was driven by the desire to be as close as possible to the POC, in order to minimise the risk of environmental impacts, disruption to a significant number of landowners, challenges with crossings and, process losses, and the cost and delay of a longer cable route.
- 4.3.20 The size of search areas for solar NSIPs has varied significantly, driven by capacity of the grid connection and local area characteristics. The Applicant used a relatively large but not unprecedented search area, in part because of the constraints imposed by urban areas to the immediate north and west of the Point of Connection and National Park further to the west.
- 4.3.21 As an example, to demonstrate the differences in search areas, other consented, solar NSIPs have adopted the following search areas:
- Mallard Pass Solar Farm – no search area adopted – suitable site found within close proximity to National Grid Substation
  - West Burton Solar Farm – 15km
  - Gate Burton Solar Farm – 8km search area with constraints mapped to 15km
  - Fenwick Solar Farm – 6km
  - Helios Renewable Energy Project – 5km
  - Byers Gill Solar Farm – 6km
  - Oaklands Farm Solar Park – 4km search area with sequential study up to 10km

## APPENDIX 1 – SITE SELECTION ASSESSMENT

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- 4.3.22 In support of the above, the Helios Renewable Energy Project Secretary of State’s Decision Letter dated 03 December 2025, reiterates at paragraph 4.15 that there is no government guidance available on what is deemed a reasonable search area. Consequently, each DCO application should be considered on its own facts, and EN-3 acknowledges that this will involve taking commercial, planning and environmental and practical constraints into account.
- 4.3.23 The Secretary of State later confirms at paragraph 4.21 that “*Taking account of the information submitted, the Secretary of State agrees with the ExA that the Applicant’s approach to alternatives and site selection is consistent with NPS EN-1 and EN-3. The Secretary of State ascribes neutral weight to the Applicant’s approach to alternatives*”.

### Proximity of the site to dwellings

- 4.3.24 NPS EN-3 paragraph 2.10.27 states that “utility-scale solar farms are large sites that may have a significant zone of visual influence. The two main impact issues that determine distances to sensitive receptors are therefore likely to be visual amenity and glint and glare”.
- 4.3.25 The area surrounding the National Grid Brinsworth Substation is characterised by concentrated development surrounding the major settlements of Sheffield, Rotherham, and Doncaster. There are smaller settlements dispersed in surrounding areas to these major settlements, including Kiveton Park, Ulley, and Conisbrough.
- 4.3.26 The Applicant focussed on areas where there was sufficient land to provide offsets to residential receptors through a combination of bespoke setbacks, natural screening, as well as existing and proposed landscape improvements, compared to alternative sites in all directions which encroach onto larger settlements and towns.
- 4.3.27 Throughout the site selection process and design evolution, the Applicant has not applied a ‘minimum/maximum’ offset methodology as it is important to assess each individual or cluster of properties on an individual basis. However, the Applicant during the final stages of design evolution introduced a minimum offset of 50m around residential properties. The Applicant considered NPS EN-1 paragraph 5.10.26 which discusses how not all projects can be reduced in scale or amend the design as could result in significant operational constraint and/or reduction in function. Therefore, this was taken into consideration during the design evolution process. Further information on offsets and the design evolution process is provided in the **Design Approach Document [EN0110020/APP/5.7]**.

### Accessibility

- 4.3.1 In accordance with paragraphs 2.10.35 to 2.10.39 of NPS EN-3, consideration has been given in the site selection process to the suitability of the access routes to the proposed Development for both the construction and operation phases. Paragraph 2.10.36 emphasises the importance of accessibility, “*given that potential solar farm sites are largely in rural areas, access for the delivery of solar arrays and associated infrastructure during construction can be a significant consideration for solar farm siting*”.

- 4.3.2 As part of the site selection process, one of the project specific site principles was that the Proposed Development would be situated in an appropriate location to access motorways and other major road infrastructure corridors for construction purposes.
- 4.3.3 As demonstrated within the **Location Plans [EN0110020/APP/2.1]**, the Proposed Development is well connected to the local motorways, including the M18 and M1 but also the wider major road infrastructure and Local Road Network. This enables the chosen site to be accessed from all necessary road networks for construction, operation (and maintenance) and decommissioning phases. Further information on this is assessed within the **ES Volume 2, Chapter 13: Traffic and Transport [EN0110020/APP/6.13]**.
- 4.3.4 The Applicant was also mindful when identifying an appropriate Search Area that this was an area characterised by existing large infrastructure corridors, including the M18, M1 and significant pylons, bringing electricity to the cities of the north from current sources of electricity in the North Sea. Whilst the Applicant recognises that there are parts of the countryside in this location which are undeveloped, they are not designated for their landscape quality, and the presence of very large-scale infrastructure offers some benefit in terms of co-location. The Applicant therefore sought to focus on areas of land close to the M18 and M1 rather than the more open countryside further east from the point of connection.

### Public Rights of Way

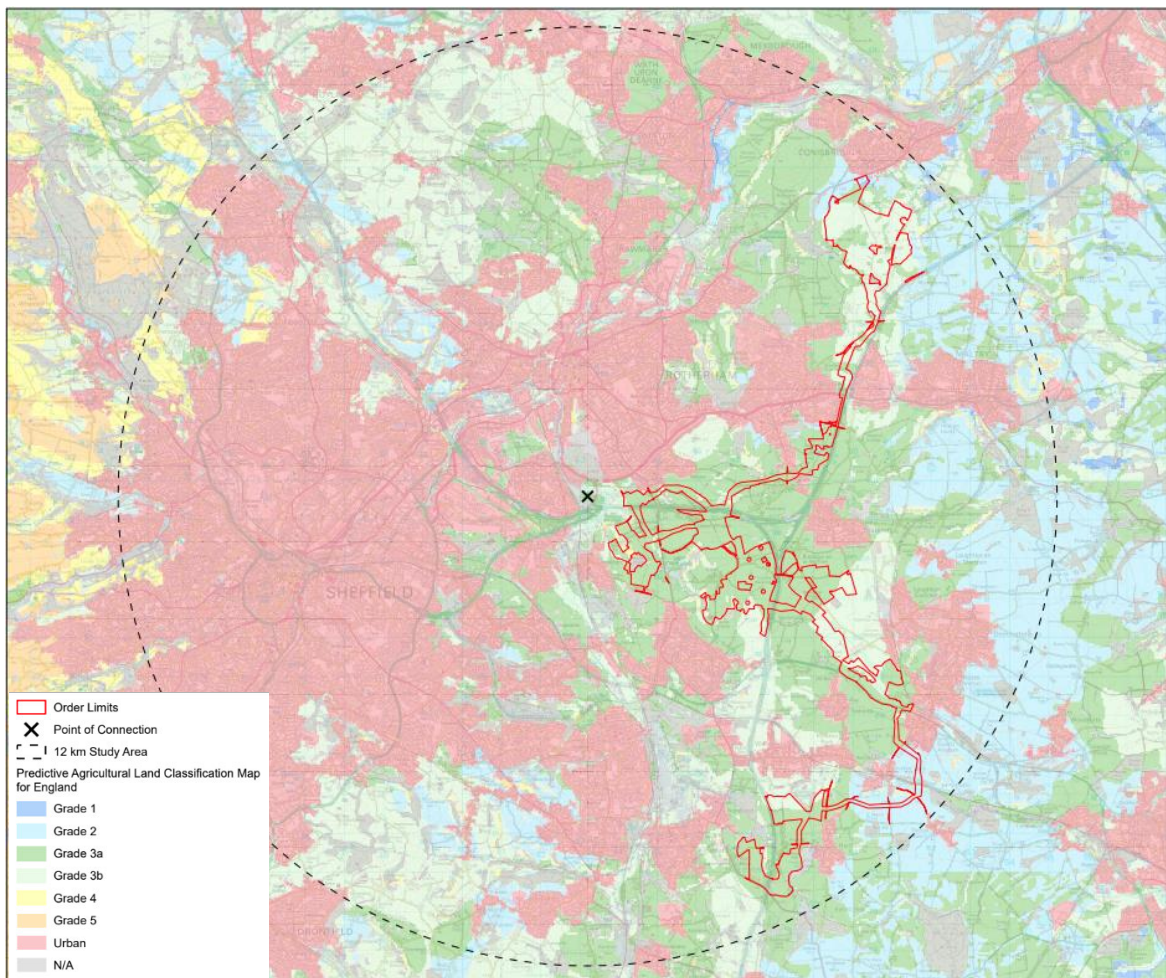
- 4.3.5 To ensure accordance with paragraphs 2.10.32 – 2.10.37 of NPS-3 has been met, consideration has been given to the proximity, usage and potential impacts of local Public Rights of Way (PRoW). Paragraph 2.10.33 of NPS-3 states “*Public rights of way may need to be temporarily closed or diverted to enable construction, however, applicants should keep, as far as is practicable and safe, all public rights of way that cross the proposed development site open during construction and protect users where a public right of way borders or crosses the site*”.
- 4.3.6 The consideration of public footpaths has been ensured within the design of the Proposed Development for submission. While this matter was taken into account during the Site Selection process, to ensure there was limited impact on PRoWs, the Applicant considers it to be primarily a design consideration and, as such, it did not carry the same weight as other principles such as strategic highway accessibility in informing the site selection process.

### Security and Lighting

- 4.3.7 Paragraphs 2.10.38 – 2.10.40 of NPS EN-3 discuss the need for Applicants to consider the security of the Site within the site selection process. Paragraph 2.10.38 notes that “*Security of the site is a key consideration for developers. Applicants may wish to consider not only the availability of natural defences such as steep gradients, hedging and rivers but also perimeter security measures such as fencing, electronic security, CCTV and lighting, with the measures proposed on a site-specific basis*”.
- 4.3.8 While this matter was taken into account during the Site Selection process, the Applicant considers it a design consideration which can be accommodated irrespective of the site selected.

4.3.9 Agricultural Land Classification and Land Type

- 4.3.10 NPS EN-3 seeks to minimise impacts on the BMV agricultural land (defined as grades 1, 2, and 3a). Policy directs development to land graded 3b, 4, or 5 first before considering higher grade land and to utilise previously developed land, brownfield land, contaminated land or industrial land where possible. Importantly, however, it goes on to state at paragraph 2.10.21 that “...*land type should not be predominating factor in determining the suitability of the site location...*”. NPS EN-3 acknowledges that solar development is not prohibited on BMV land, land recognised for its natural beauty or ecological or archaeological importance and that it is recognised that, at scale, developments may use some agricultural land. However, applicants should explain site selection noting a preference for development on brownfield and non-agricultural land.
- 4.3.11 According to the provisional ALC mapping (DEFRA and Natural England), the site selection Search Area has a mixture of largely Grade 3 with small pockets of Grade 2 and 4 and 5, making complete avoidance of BMV almost impossible in the Search Area for development of the scale proposed. Nevertheless, the Applicant has sought to reduce the likelihood of encountering BMV, by focusing its search closer to the point of connection and the area of Grade 3 land to the east of Rotherham, seeking to avoid the band of Grade 2 land located between Rotherham and Doncaster (as shown on Figure 2).



**Figure 2 - Agricultural Land Classification – Yorkshire and The Humber (Natural England)**

- 4.3.12 The Applicant has considered agricultural land quality when identifying the Order Limits, based on publicly available information and the extent to which this played a part in site selection decision making is explained further below. This approach to considering ALC values, in terms of the use of provisional and predictive mapping, has been considered as both satisfactory and proportionate by the Examining Authorities in relation to granted DCOs, including the Gate Burton Energy Park DCO and Mallard Pass Solar Farm DCO. As noted in EN-3 paragraph 2.10.21, land type should not be a predominating factor in determining the suitability of the site location, but applicants should where possible avoid the use of BMV agricultural land. It is however recognised that at this scale, it is likely that applicants' developments will use some agricultural land.
- 4.3.13 Consideration was given as to whether alternative land could be found with less impacts on agricultural land in proximity to the Brinsworth Substation. However, from the published information the same type of grading is found throughout much of the Search Area, and further afield, and so sites further from the point of connection would be likely to have very similar soil characteristics.
- 4.3.14 On that basis, the Proposed Development has taken an approach that is consistent with the NPS EN-3 through prioritising development on non-BMV land where possible.
- 4.3.15 As illustrated on Figure 01, the immediate area surrounding the POC predominantly comprises Grade 3 and Grade 4 agricultural land, with only limited pockets of Grade 2 land. The mapping further indicates that land to the west of the POC transitions into areas characterised by a high concentration of urban development. Such areas are considered unsuitable for development of this nature due to existing built form constraints and land use incompatibilities.
- 4.3.16 In contrast, land to the east of the POC comprises increasingly extensive areas of Grade 2 agricultural land, including a substantial north–south band of Grade 2 land located between Doncaster and Worksop. This concentration of higher-quality agricultural land was a key consideration in defining the Search Area. Grade 2 land falls within the BMV agricultural land classification and is afforded policy protection. In accordance with NPS EN-3 paragraph 2.10.21, *“poorer quality land should be preferred to higher quality land avoiding the use of Best and Most Versatile agricultural land where possible.”*
- 4.3.17 Therefore, the extent of Grade 2 land to the east of the POC acted as a limiting factor when defining the Search Area, and amongst other considerations, helped to define the 12km radius.

### *Cumulative Schemes*

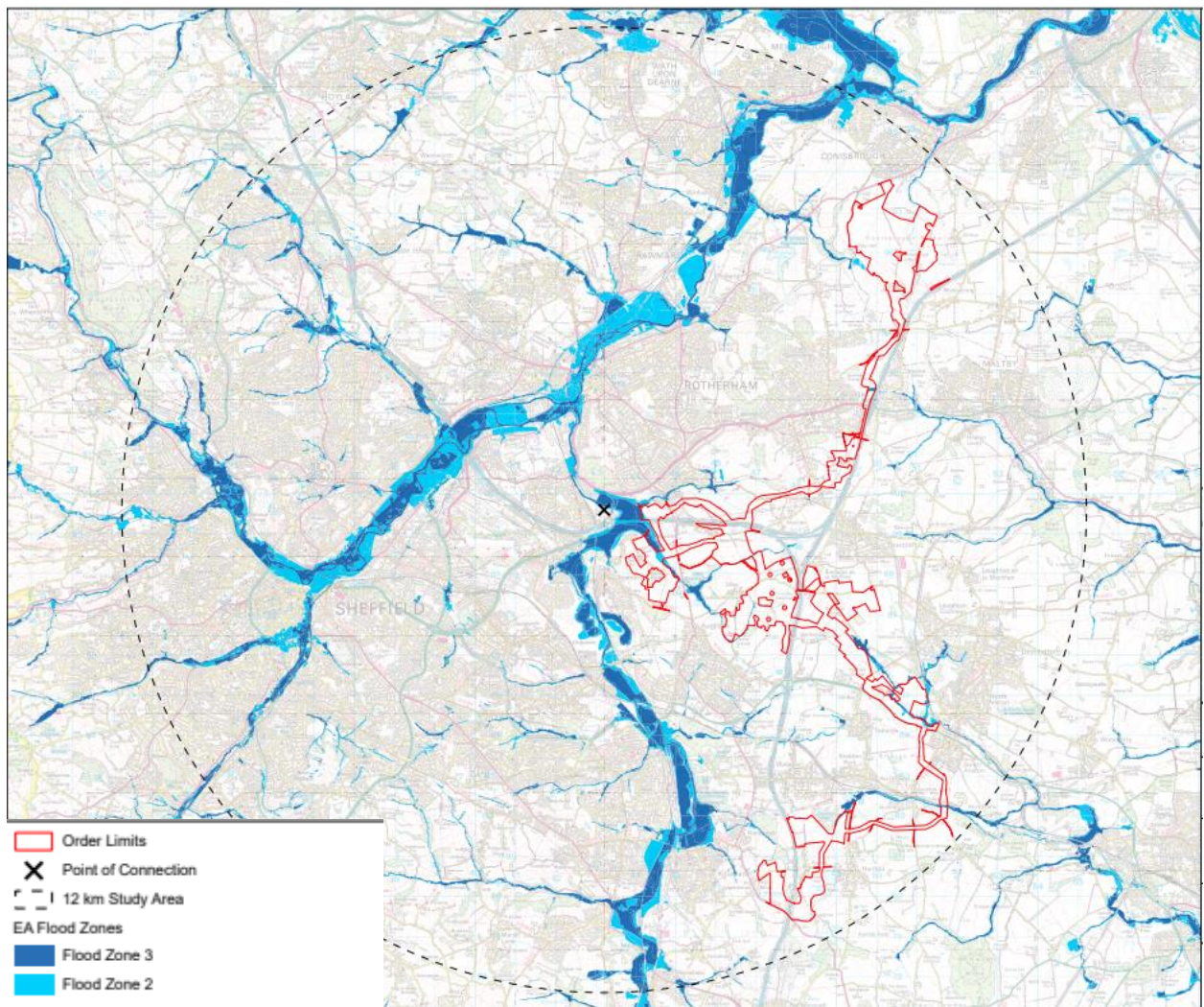
- 4.3.18 Following the identification of the South Yorkshire region, the Applicant team undertook a review of nearby NSIPs that could influence the extent and location of the immediate Search Area. As illustrated on Figure 05 of this report, a substantial number of NSIP schemes are located to the east of the South Yorkshire region, with a notable cluster around areas such as Gainsborough and Gate Burton. This concentration of projects increased the potential for cumulative effects when moving further east.
- 4.3.19 This too acted as a limiting factor in the depiction of the Search Area, and amongst other considerations, helped to define the 12km radius as being appropriate, taking into account the absence of other solar NSIP schemes within this area. This approach was adopted to help minimise the potential for cumulative impacts across a range of environmental considerations, including traffic and transport, landscape and visual effects, and noise.

*Flood Risk*

4.3.20 As shown on Figure 3, flood risk across the South Yorkshire region varies. Within the immediate vicinity of the POC, the majority of land is located within Flood Zone 1, with only limited parcels falling within Flood Zones 2 and 3. However, the mapping demonstrates that moving east of the POC, beyond the A1/M1 corridor, there is an increasing extent of land designated as Flood Zones 2 and 3. The growing concentration of areas at medium and high risk of flooding significantly constrains the suitability of land for development of this scale in that location, when there is potentially available land at lower risk of flooding, following the application of the Sequential Test.

4.3.21

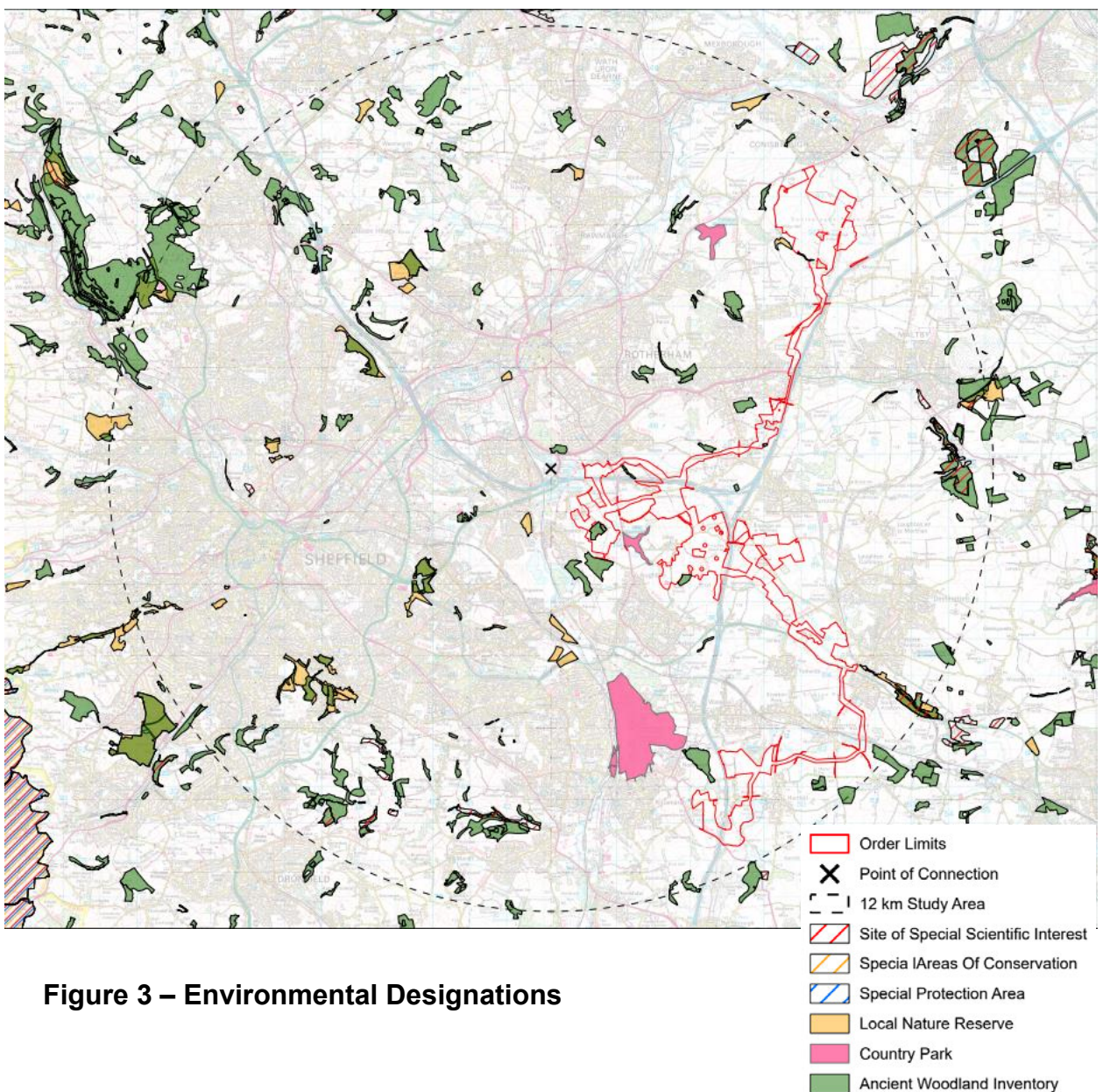
4.3.22 The band of Flood Zones 2 and 3, extending from Goole to Newark on Trent, therefore acts as a functional and environmental constraint to the eastward expansion of the Search Area beyond the 12km radius. Given the sequential approach to site selection and the inherent risks associated with locating major development within areas of elevated flood risk, this zone assisted in the multi-factorial assessment which defined the extent of the Search Area.



**Figure 3 – Flood Zones**

*Environmental Designations*

- 4.3.23 Finally, the Applicant undertook a review of local environmental designations. One of the most significant strategic constraints influencing the extent of the Search Area was the presence of the Peak District National Park to the west of Sheffield as shown on Figure 3. Covering approximately 1,437km<sup>2</sup>, the National Park represents a nationally designated landscape of the highest status of protection. Its scale and sensitivity form a substantial environmental constraint and a clear western boundary to the potential extent of the Search Area from the POC.
- 4.3.24 The nearest boundary of the Peak District National Park lies approximately 15km west of the POC. This separation distance demonstrates that the Search Area was defined with a clear limitation in this direction, ensuring that potential direct and indirect effects on the designated landscape were avoided.



### Summary

- 4.3.25 Topographically, the local area which is the subject for the Proposed Development is considered suitable for solar development. The immediate area surrounding the National Grid Substation at Brinsworth is of a mixed topography and includes a number of locations that are flat or on a moderate slope, and therefore viable within respect to engineering and irradiation considerations. The topography also limits the quantity of solar visible from any one viewpoint.
- 4.3.26 The distance of the Search Area was defined at 12km to balance technical feasibility, commercial viability, and environmental considerations, with proximity to the fixed Point of Connection at the National Grid Brinsworth Substation being a key determinant in the site selection process as set out above.
- 4.3.27 However, areas closest to the substation were preferred in principle as it allowed Applicants to minimise the length of the cable corridor which limits the financial cost of the infrastructure and construction but also limits the extent of environmental impacts and disruption which increase as the length of the cable corridor does. These environmental impacts include matters such as vegetation removal.

## 4.4 Stage 2 – Consideration of Planning, Environmental and Spatial Constraints within 12km Search Area

- 4.4.1 As described above, a key principle in the site selection process was to seek to avoid areas of environmental and landscape sensitivity in order to minimise potential impacts. This is both from a natural and built environment perspective, including matters such as ecology and biodiversity, landscape, water resources and cultural heritage.
- 4.4.2 The Applicant had regard to several environmental and spatial considerations when determining the location of the Order Limits in the 12km Search Area in accordance with Part 2.3 and Part 2.10 of NPS EN-1 which are detailed below.
- **Designated international and national ecological and geological sites** - nationally recognised designations such as Sites of Special Scientific Interest (SSSIs), National Nature Reserves, National Parks, the Broads, Registered Parks and Gardens, and World Heritage Sites were considered as part of the site selection process in accordance with NPS EN-3 paragraph 2.3.6. As outlined in paragraph 3.1.7 above, NPS EN-1 also outlines specific tests where development would lead to significant harm to biodiversity and geological conservation interests (NPS EN-1 section 5.4). Biodiversity and geodiversity conservation considerations were therefore also given significant weight in the site selection process.
  - **Nationally Designated Landscapes** – in accordance with NPS EN-3 paragraph 2.3.6 nationally designated landscapes, previously referred to as ‘Areas of Outstanding National Beauty’ were considered as part of the site selection process. As these are nationally designated, significant weight was attributed to this consideration.
  - **Scheduled Monuments and conservation areas** – in accordance with paragraph 2.3.8 of NPS EN-3 and section 5.9 of NPS EN-1, the impact on

the historic environment was considered as part of the site selection process. The weight attributed to this consideration was influenced by the level of significance of the particular designated heritage assets.

- **Proximity to human receptors** – in accordance with paragraph 2.10.27 of NPS EN-3, consideration was given to the proximity of human receptors due to the potential impacts to visual amenity and glint and glare. A moderate weight was attributed to this consideration.
- **BMV** – in accordance with paragraph 2.10.29 of NPS EN-3 consideration was given to the ALC, with the site selection process seeking to avoid areas of BMV agricultural land. A moderate weight was attributed to the consideration of BMV agricultural land.
- **Flooding** – the site selection process considered areas of lower flood risk in accordance with paragraph 2.10.75 of NPS EN-3 and section 5.8 of NPS EN1. Whilst avoiding areas of higher flood risk was a key consideration in terms of compliance with the sequential test, flood risk was attributed relatively low weight in the site selection process compared to other environmental criteria, on the basis that solar panels can be technically accommodated in flood zones, without increasing flood risk elsewhere.

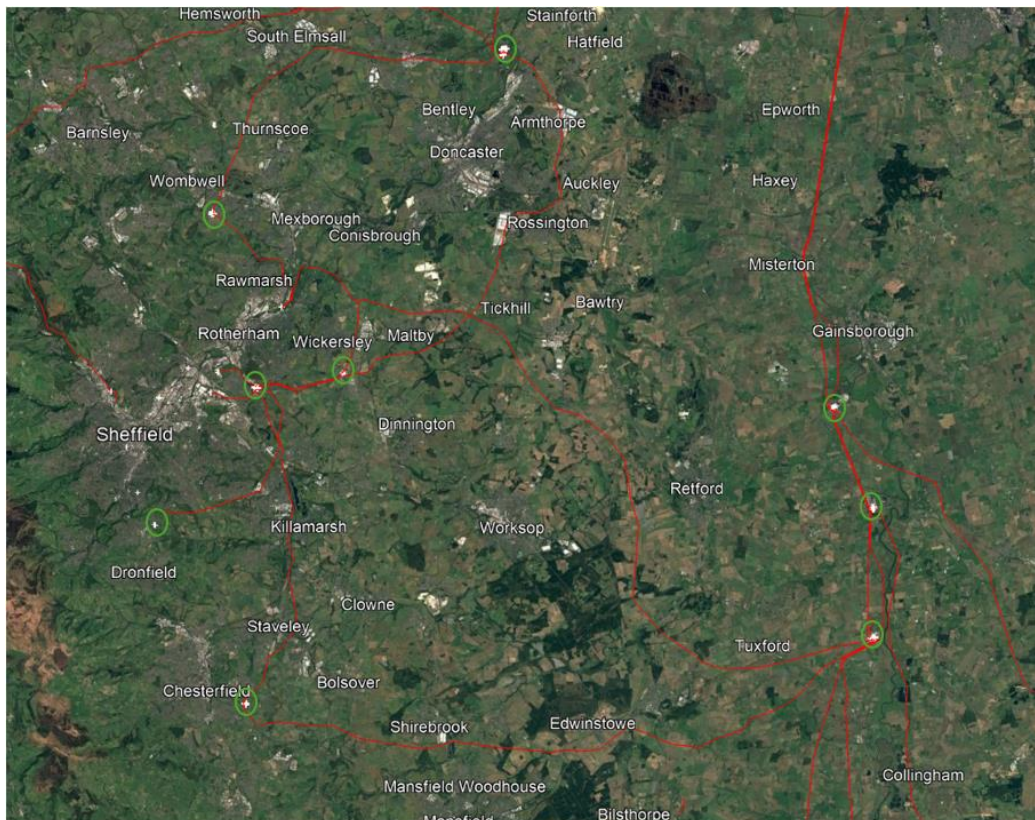
### Green Belt Designation

- 4.4.3 Whilst the starting point for the site selection approach was to avoid or minimise the use of Green Belt where possible, when looking to focus the Proposed Development within the South Yorkshire region, specifically as close as possible to the POC at Brinsworth B substation, the Applicant noted that the majority of the undeveloped land around the substation, and within the 12km Search Area was located within the South Yorkshire Green Belt. Three options were initially considered as set out below:
- Green Belt only;
  - Non-Green Belt; and
  - Mixture of non-Green Belt and Green Belt
- 4.4.4 Stage 1 of the Site Selection Assessment identified that 12km was the most appropriate Search Area, for the reasons explained earlier in this Report, and if the decision was made to locate the Proposed Development outside of the Green Belt, the closest development parcel would be approximately 15km from the POC, with the other parcels well beyond this range, to be located completely outside of the Green Belt.
- 4.4.5 The other reasons for progressing with a development within the Green Belt comprised:
- Short cable route and associated benefits in terms of cost, programme and connection date – if a site outside the Green Belt had been selected, it would have had significant implications for deliverability in terms of programme and cost. Therefore, choosing a site closer to the POC helps to minimise these risks and reduce potential delays for connecting to the national grid and additional expenses.
  - A project connected at Brinsworth, but located outside of the Green Belt, would need to be at least 15km, in a straight line, from POC for the closest development parcel – this would significantly increase the cable route

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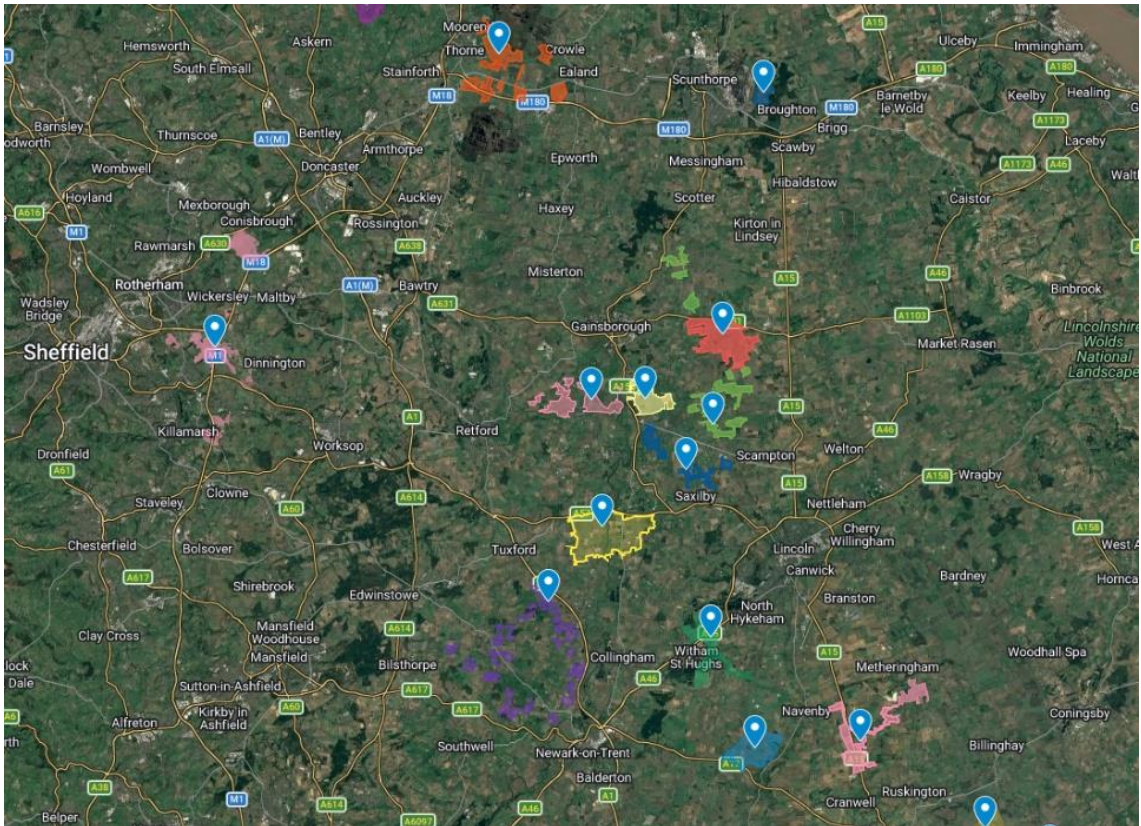
length, require substantially more land to deliver the solar farm, and extend development complexity. Additionally, a location at this distance would encroach onto land with a higher ALC rating.

- Sites at a greater distance are in closer proximity to other substations and so would not be making the use of the available capacity at Brinsworth – there are approximately nine other substations within the wider area (see Figure 4). Sites at greater distances would be better suited to connecting to these substations, for cost, programme and disruption reasons, and therefore in order to utilise the existing capacity at Brinsworth a site closer would be best suited.



**Figure 04 – NGET Substation Locations**

- Potential cumulative impact with other solar NSIPs for land further from POC – as illustrated in Figure 5, several NSIP schemes are currently at pre-application, examination, or determination stages within the wider region. Sites located east of the Brinsworth substation PoC would move closer to the cluster of NSIPs around locations such as Gainsborough and Gate Burton, increasing cumulative considerations.



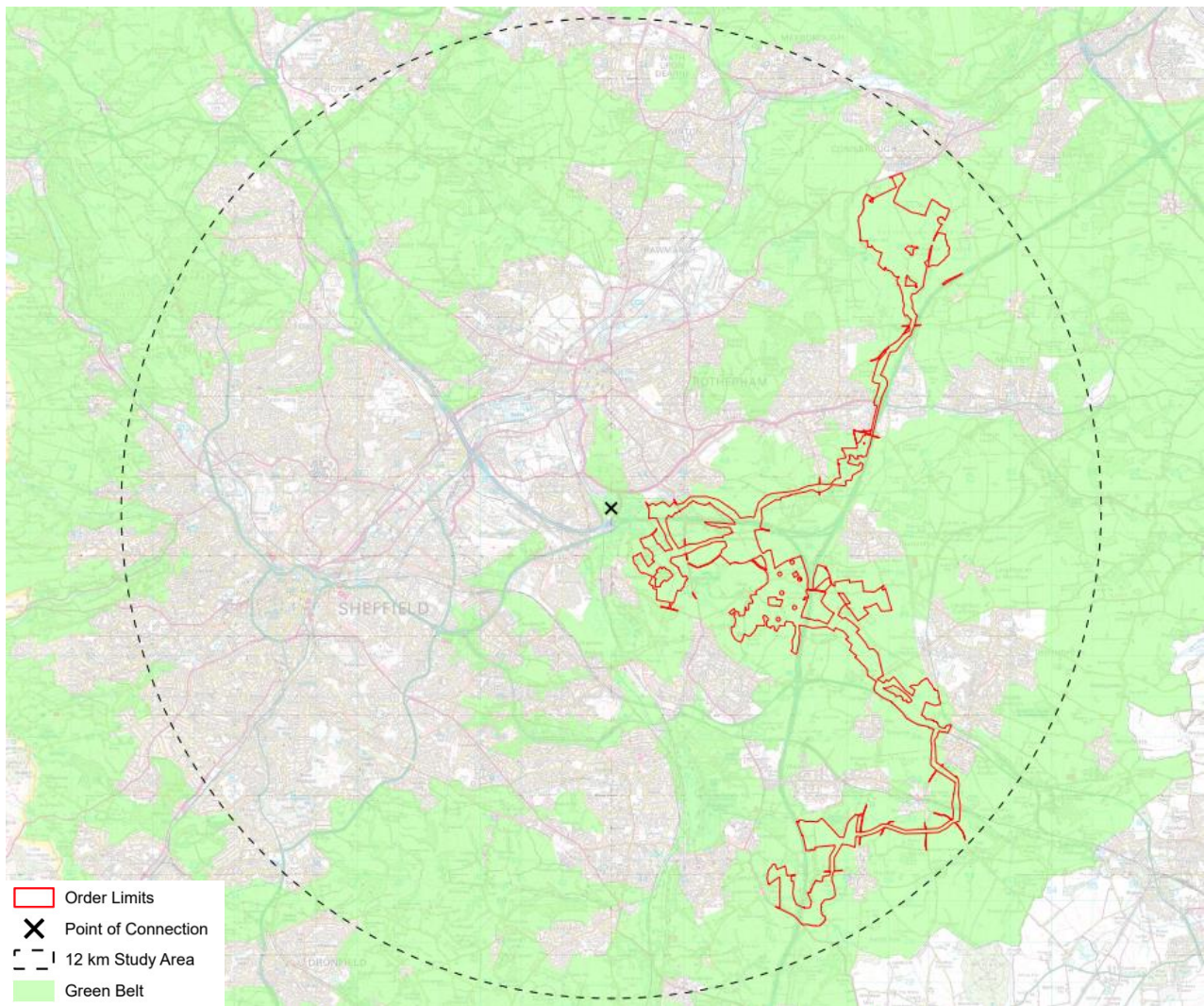
**Figure 5 – Cumulative NSIP Schemes**

- Grade 3 and 4 agricultural land to purposefully avoid a belt of Grade 2 – Land to the east of the Proposed Development is more constrained by environmental factors, including a higher prevalence of Grade 2 agricultural land, which is less suitable for energy infrastructure development in accordance with relevant planning policy.

4.4.6 Following a detailed review of the Natural England ALC maps, it was clear that the Rotherham and Doncaster Green Belt was of variable quality, partly due to the predominance of large scale infrastructure in the landscape, including two major motorways, offering the opportunity to identify areas which didn't perform well in terms of the overall purposes of the Green Belt and could instead play an important role in generating clean, renewable energy.

4.4.7 For the reasons set out above, increasing the Search Area to 15+km was not viable or reasonable in this instance, and so the decision was taken to include land within the Green Belt, but ensure that the purpose of the Green Belt as set out in NPPF paragraph 143 were maintained through the design of the Proposed Development and to prioritise the use of land which the Applicant considered met the tests of grey belt (see below).

4.4.8 Through the Green Belt Assessment at **Appendix 2 of the Planning Statement [EN0110020/APP/5.5]** it has been demonstrated that all of the land within the Order Limits meets the definition of grey belt, and in any event the Proposed Development benefits from Very Special Circumstances (VSC) and is acceptable development in the Green Belt.



**Figure 6: Spatial Extent of Green Belt for Whitestone 1**

### Other Designations

4.4.2 The following spatial constraints were also identified within the Search Area, which the Applicant considered when identifying potential land for solar development.

Consideration	Discussion
Designated international and national ecological and geological sites	Figure 3 above shows the locations of ecological and geological sites within the Search Area.  Within the Search Area, there are several SSSIs but these do not interact with the Order Limits. In terms of other ecological sites, there are a number of Country Parks and local wildlife sites within the Search Area. The site selection assessment sought to avoid these ecological sites, but Brampton Common Local Wildlife Site could not be avoided. The Applicant has included this area within the Order

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	Limits and the reasoning for this is set out within the <b>ES Volume 2, Chapter 6: Biodiversity and Nature Conservation [EN0110020/APP/6.6]</b> and the landscape improvement strategy is set out in the <b>Outline Landscape and Ecology Management Plan (oLEMP) [EN0110020/APP/5.13]</b> . In summary this Local Wildlife Site is not significantly contributing to its purpose for designation, and therefore the Proposed Development does not result in a net harm to the Local Wildlife Site, but rather through mitigation measures enhances its ability to fulfil its purpose.
Nationally designated landscapes	Figure 3 above, confirms there are no National Landscapes or National Parks within the refined Search Area.
Scheduled monuments and conservation areas	Figure 3 shows the location of Scheduled Monuments and Conservation Areas within the Search Area. There are a number of Scheduled Monuments and Conservation Areas located throughout the Search Area. The site selection process has sought to avoid Scheduled Monuments and Conservation Areas.
Proximity to sensitive human receptors	Consideration was given to the proximity of nearby sensitive human receptors which include residential dwellings and populated areas/villages.
BMV	In line with NPS EN-3 the site selection process sought to avoid areas of higher grade BMV (Grade 1 and Grade 2). As such the Applicant focussed on the predominantly provisional Grade 3 land within the refined Search Area. Subsequent surveys commissioned by the Applicant have now demonstrated that the Order Limits would primarily be situated on Grade 3b land which is not considered as 'BMV' land and therefore aligned with the requirements set out in EN-3 which recommends Applicants to avoid higher grade BMV. It should be noted that ALC surveys have not been completed on the Cable Corridors.
Flooding	The Search Area did not include large areas of higher flood risk (Flood Zones 2 and 3), and flooding therefore did not significantly impact the site selection process, however the Applicant sought to avoid areas within Flood Zones 2 and 3, where these did occur, consistent with the Sequential Test for flood risk.

	<p>At the time of the site selection process, the Environment Agency flood mapping was used and it was clear from this that there were only small parcels of Flood Zones 2 and 3 in the Search Area, with the remainder falling predominantly within Flood Zone 1. It should be noted that this flood mapping has recently been updated in December 2025 to include up to date flood modelling and some small areas of the Order Limits are now located within Flood Zones 2 and 3. The Applicant based its Site Selection on the available information at the time, which showed that the Site fell almost entirely within Flood Zone 1, with the Applicant committing to no development within the higher flood zones due to the limited coverage, and therefore passed the Sequential Test for flood risk at a site selection level with no further assessment required at Application stage. However, the Applicant has considered the up to date flood modelling from a site design perspective and has located sensitive electrical equipment outside of Flood Zones 2 and 3. There is however a small percentage of solar panels which lie in Flood Zones 2 and 3 and these have been designed with a clearance above the flood extent plus climate change and will not increase flood risk overall <b>ES Volume 3, Appendix 10.3: Flood Risk Assessment [EN0110020/APP/6.20]</b>.</p> <p>Given the changes to the mapping post-site selection stage, the Applicant does not consider it is appropriate or proportionate to go back to the site-selection stage from a flood risk perspective, and will consider the implications of the small area of solar panels being located within Flood Zone 2 and 3 from a design perspective as set out in the <b>ES Volume 3, Appendix 10.3: Flood Risk Assessment [EN0110020/APP/6.20]</b> and <b>Design Approach Document [EN0110020/APP/5.7]</b>.</p>
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## 4.5 Stage 3 – Identifying Potential Solar Development Areas

- 4.5.1 Following the identification of the grid capacity and consideration of the above planning and environmental designations, the Applicant sought to identify suitable land to develop an NSIP-scale solar farm within the 12km search area, to be taken forward for a DCO.
- 4.5.2 Within the initial stages of discussions, the Applicant was focused on finding an appropriate amount of land to secure both the connection capacity and the required mitigation and enhancement land that was close to the National Grid substation.
- 4.5.3 The following sub-sections explain the criteria applied to the potentially suitable areas identified at Stage 2 (see section 4.4).

### Alternative Sites Consideration

- 4.5.4 As noted in the summary of Step 1 in section 4.3 of this assessment, following the identification of South Yorkshire as a suitable location for a NSIP size solar farm, capacity was identified at the National Grid Brinsworth Substation which would support the operation of a proposed development of this scale.
- 4.5.5 The Applicant undertook an assessment of potentially available land within the Search Area that had suitable characteristics for ground-mounted solar, taking into account the following considerations:
- Ecology – potential impact on designated and non-designated sites, habitats and species.
  - Landscape and visual – potential impact on national and local designations, key views, landscape character and visual amenity.
  - Green Belt – the contribution of the land to the five Green Belt purposes.
  - Cultural heritage and archaeology – impact on designated and non-designated assets and potential for below-ground archaeology.
  - Community – impact on residential properties in terms of visual disturbance, noise and air quality.
  - Flood risk – consideration of the flood zone and prioritising sites in Flood Zone 1, over zones 2 and 3, in compliance with the sequential test.
  - Agricultural land – the presence of best and most versatile agricultural land, with lower grade land being preferred over higher grade.
  - Land use – conflict with Local Plan designations.
  - Construction access – accessibility to the highway network, existing access arrangements and whether there were any other practical implications to construction.
  - Public rights of way – potential impact on users and potential for suitable offsets.

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- Operational impacts – whether the site could be technically developed for a solar farm, in terms of gradient and efficiency and be suitability maintained.

4.5.6 The assessment followed a risk-based approach and was carried out using a range of techniques:

- Review of desk-based information on designations, for example in the Local Plan, Magic Maps and agricultural land classification data.
- Site visits by the Applicant and its planning advisors including walking publicly available land to form an overall view of suitability for solar.
- Consideration of the impact on viewpoints.
- The Applicant's technical knowledge and experience of developing and managing solar projects elsewhere.

This information was then used to rule out potential land within the Search Area that the Applicant considered was unlikely to secure consent for NSIP-scale solar. This was inevitably an exercise informed by professional judgement on the balance of risk and likelihood of securing consent, as recognised by paragraph 2.3.4 of NPS EN-1.

4.5.7 Some of the reasons for the potentially suitable land for solar being discounted and not taken forward included:

- Some land was located within large areas of Flood Zones 2 and 3 and so was discounted on the basis of the application of the Sequential Test.
- Land which was identified at a high level as Grades 1 and 2 based on Defra and Natural England mapping was excluded.
- Some land was excluded based on impact on communities and residential amenity.
- Land which was considered to make a significant contribution towards the five purposes for including land within the Green Belt was excluded at this stage, subject to more detailed assessment.
- Land adjoining Ulley Reservoir Country Park was discounted for a variety of reasons including impact on ecology and habitats, residential amenity, flood risk and Green Belt.
- Engineering feasibility due to the hard boundaries of the M18.
- Safeguarded land for future development.

- 4.5.8 As stated above, a risk-based approach was taken and in some cases, land was discounted due to a range of overlapping factors, for example in relation to land adjacent to Ulley Reservoir Country Park.
- 4.5.9 Following the identification of potentially suitable land, having regard to the consideration of planning and environmental constraints, the Applicant also considered previously developed land, known as brownfield land. This is set out in further detail below.

### Previously Developed Land

- 4.5.1 As part of the site selection process, consideration was initially given to previously developed land (PDL)/brownfield sites, commercial rooftops, and lower-quality agricultural land.
- 4.5.2 NPS EN-3 places emphasis on large scale solar utilising either previously developed land, brownfield land, contaminated land, industrial land or lower grade (3b, 4 or 5) land and, where possible, avoiding BMV agricultural land. Paragraph 2.10.21 of NPS EN-3 states *“while land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise suitable previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land avoiding the use of “Best and Most Versatile” agricultural land where possible”*. Paragraph 2.10.22 of NPS EN-3 continues to acknowledge that *“whilst the development of ground mounted solar arrays is not prohibited on Best and Most Versatile agricultural land, or sites designated for their natural beauty, or recognised for ecological or archaeological importance, the impacts of such are expected to be considered...”*.
- 4.5.3 Paragraph 2.10.23 of NPS EN-3 states that *“It is recognised that at this scale, it is likely that applicants’ developments will use some agricultural land. Applicants should explain their choice of site, noting the preference for development to be on suitable brownfield, industrial and low and medium grade agricultural land”*.
- 4.5.4 The Applicant considered whether sufficient PDL would be available to develop a utility scale solar development, however an assessment of PDL/brownfield land within the wider Search Area identified no land of an adequate land area to facilitate a large-scale solar project either individually or in combination with other sites.
- 4.5.5 Local Planning Authorities are required to keep a register of PDL suitable for residential-led development, although this does not exclude consideration for other uses. The Applicant has reviewed these brownfield registers for the host authorities, and this is set out below in Table 02 which details the brownfield sites in the Search Area.
- 4.5.6 From these brownfield sites reviewed, there were no brownfield sites from the register which would individually or cumulatively provide an adequate area to facilitate the Proposed Development; nor were they located in suitable areas. Factors which are relevant to the assessment of the potential of a brownfield site for solar development of a NSIP scale include: amount of clearance work required to make the land usable, size of parcel, distance from other parts of the Proposed Development and alternative uses for the land that would out-compete solar power. None of the sites on the LPAs' PDL registers, as set out in Table 02 below, passed those basic tests. Where there are areas of brownfield land with potential

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for ground-mounted solar, it would be more practical to use them for direct connection to large power consumers in the immediate vicinity

**Table 02 – Previously Developed Sites from Brownfield Registers of all LPAs**

LPA	Site Ref	Location	Site Size (ha)	Comments
Rotherham Metropolitan Borough Council	RMBC 01	Land off York Road, St Ann's, Rotherham, S65 1PN	0.47	Allocated for residential development, and has recently had an application granted for 12 houses on this Site (ref. RB2024/011)
	RMBC 02	Land at Boswell Street and Arundel Road, Herringthorpe, Rotherham	0.46	Located adjacent / behind residential properties with unsuitable distances for mitigation and therefore not suitable for the Proposed Development.
	RMBC 03	Land behind Bradgate Club, Bradgate Lane, Rotherham, S61 1QJ	0.59	Located adjacent / behind residential properties with unsuitable distances for mitigation and therefore not suitable for the Proposed Development.
	RMBC 04	Timberyard, Outgang Lane, Dinnington, S25 3QX	7.96	Allocated for residential development, and has had an application granted conditionally for 271 houses on this Site (ref. RB2012/1643)
	RMBC 05	Moorgate House, Moorgate Road, Rotherham, S60 2AD	0.43	Located adjacent / behind residential properties with unsuitable distances for mitigation and therefore not suitable for the Proposed Development.
	RMBC 06	Land to the north west of Doncaster Road, Dalton, Rotherham	0.63	Allocated for residential development and therefore not suitable for the Proposed Development.
	RMBC 07	Charnwood House, Charnwood Street, Swinton, Rotherham	0.62	Allocated for residential development and therefore not suitable for

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				the Proposed Development.
RMBC-08	-31 Carlyle Road, Maltby, Rotherham, S66 7LP	0.03	Allocated for residential development and therefore not suitable for the Proposed Development.  The site size is also too small for the Proposed Development.	
RMBC-09	-Land at Oldgate Lane, Thrybergh, Rotherham, S65 4JX	0.08	Allocated for residential development and therefore not suitable for the Proposed Development.  The site size is also too small for the Proposed Development.	
RMBC-10	-Land at Herringthorpe Valley Road, Herringthorpe, Rotherham	0.14	Located adjacent / behind residential properties with unsuitable distances for mitigation and therefore not suitable for the Proposed Development.	
RMBC-11	-Land at Challenger Tyre & Exhaust, Wellgate, Rotherham Town Centre	0.34	Located within the town centre and therefore would not be suitable for the Proposed Development.	
RMBC-12	-Land at Morrell Street, Maltby, S66 7LP	0.07	The site size is too small for the use of the Proposed Development. Allocated for residential development.	
RMBC-13	-13 Quarry Lane, North Anston, Rotherham, S25 4DB	0.17	Allocated for residential development, and has had an application granted conditionally for 6 houses on this Site (ref. RB2020/1783)	
RMBC-14	-20-22 Bradgate Lane, Rotherham, S61 1QH	0.09	Allocated for residential development and therefore not suitable for the Proposed Development.	

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				The site size is also too small for the Proposed Development.
	RMBC -15	-1 Magna Lane, Dalton, Rotherham, S65 4HH	0.07	<p>Allocated for residential development (holds planning permission for an apartment block) and therefore not suitable for the Proposed Development.</p> <p>The site size is also too small for the Proposed Development.</p>
	RMBC -16	-7 Hunger Hill Lane, Whiston, Rotherham, S60 4BD	0.2	<p>Allocated for residential development (holds planning permission for an apartment block) and therefore not suitable for the Proposed Development.</p> <p>The site size is also too small for the Proposed Development.</p>
	RMBC -17	-Land off Monksbridge Road, Dinnington, Rotherham, S25 3QS	1.4	<p>Allocated for residential development (holds planning permission for 35 dwellinghouses) and therefore not suitable for the Proposed Development.</p> <p>The site size is also too small for the Proposed Development.</p>
	RMBC -18	-Station Works, Station Street, Swinton, Rotherham, S64 8AU	0.13	<p>Allocated for residential development (holds planning permission for 14 apartments – RB2013/0741) and therefore not suitable for the Proposed Development.</p> <p>The site size is also too small for the Proposed Development.</p>

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RMBC 19	49 Potter Hill, Greasbrough, Rotherham, S61 4NX	0.13	Allocated for residential development (holds planning permission for 7 apartments – RB2014/0012) and therefore not suitable for the Proposed Development.  The site size is also too small for the Proposed Development.
RMBC 20	Land at DSR Demolition, 63 Psalters Lane, Rotherham, S61 1DL	0.05	The site size is too small for the use of the Proposed Development.
RMBC 21	Lisle Road, Broom, Rotherham, S60 2RL	0.52	The site size is too small for the use of the Proposed Development.
RMBC 22	Rawmarsh Progressive Sports & Social Club, Willowgarth, Rawmarsh, Rotherham, S62 5RB	0.23	Allocated for residential development (holds planning permission for 12 dwellings – RB2019/0821) and therefore not suitable for the Proposed Development.  The site size is also too small for the Proposed Development.
RMBC 23	Swinden Technology Centre, Moorgate Road, Rotherham, S60 3AR	6.68	Allocated for residential development (holds planning permission for 192 dwellings – RB2020/1591) and therefore not suitable for the Proposed Development.
RMBC 24	11 High Street, Swallownest, Rotherham, S26 4TT	0.09	The site size is too small for the use of the Proposed Development.
RMBC 25	Land Off Chatham Street/Doncaster Gate, Rotherham, S65 1DJ	0.1	Located within the Rotherham town centre, which would not be suitable for the Proposed Development use.
RMBC 26	32-34 Corporation Street, Rotherham, S60 1NG	0.02	Located within the Rotherham town centre, which would not be suitable for the Proposed Development use.

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	RMBC - 27	Weir Side Site, Off Corporation Street, Rotherham	0.27	Located within the Rotherham town centre, which would not be suitable for the Proposed Development use.
	RMBC - 28	Askey Haulage and Storage, Monksbridge Road, Dinnington, Rotherham	0.82	Located within an industrial park, which would not be suitable for the Proposed Development use.
	RMBC - 29	24 Boswell Street, Broom, Rotherham, S65 2ED	0.07	The site size is too small for the use of the Proposed Development.
	RMBC - 30	The Howard Building, Howard Street, Rotherham, S65 1AX	0.21	Located within the Rotherham town centre, which would not be suitable for the Proposed Development use.
	RMBC - 31	Land at Ryton Road, South Anston, Rotherham	0.93	Allocated for residential development (holds planning permission for 30 dwellings – RB2015/0472) and therefore not suitable for the Proposed Development.
North East Derbyshire District Council	NEDDC - 01	Bradley Lomas Electrolok Ltd, Church Street, Eckington	0.97	Allocated for residential development (holds planning permission for 20 dwellings – 18/00358/RM) and therefore not suitable for the Proposed Development.
	NEDDC - 02	S And A Parsons Building Contractors Ltd, Mansfield Road, Highmoor	0.78	Allocated for residential development and was granted permission in 2017 for 22 dwellings which have now been constructed. Therefore, this Site was not viable.
	NEDDC - 03	Garages at Castle Hill, Eckington	0.21	Allocated for residential development of 7 dwellings and would therefore not be suitable for renewable energy development.
	NEDDC - 04	The Old Station, Station Road, Killamarsh	0.47	Allocated for residential development of 8 dwellings and would therefore not be suitable

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				for renewable energy development.
	NEDDC - 05	Hornthorpe Cottage, Setcup Lane, Eckington, S21 4FN	0.28	Allocated for residential development of 5 dwellings and would therefore not be suitable for renewable energy development.
City of Doncaster	CoD - 01	Conisbrough Methodist Church, Chapel Lane, Conisbrough	0.08	residential development of 5 dwellings and would therefore not be suitable for renewable energy development.

4.5.7 The Applicant has also reviewed the suitability of industrial areas within the Search Area to accommodate an NSIP-scale solar farm. The main industrial areas within the Search Area include:

- Advanced Manufacturing Park
- Aldwarke (industrial area)
- Aven Industrial Park
- Barbot Hall Industrial Estate
- Bently Business Park
- Brad Marsh Business Park
- Callflex Business Park
- Claywheels Industrial Estate
- Eastwood Trading Estate
- Farfield Industrial Estate
- Great Eastern Way Industrial Park
- Hoyland Industrial Estate
- Hellaby Industrial Estate
- Hillfoot Industrial Estate
- Holbrook Industrial Estate
- Hoyland Industrial Estate
- Ivanhoe Business Park
- Kingsforth Road Industrial Estate
- Kiveton Park Industrial Estate
- Listerdale Shopping Centre
- Mandale Business Park
- Meadowbank Industrial Estate
- Moorgate Crofts Business Centre

- Neepsend Industrial Estate
- Parkgate Shopping Park
- Riverside Park Industrial Estate
- Seaton Business Park
- Tinsley Industrial Estate

4.5.8 None of the above areas have sufficiently available land to accommodate a development of the size proposed. Since the site selection exercise, the Liberty Steel plants at Rotherham and Brinsworth have closed following the company going into insolvency in 2025. A Ministerial question was raised on 2<sup>nd</sup> September 2025 with the Minister for Industry recorded as saying:

*“With all that said, I very much believe that the steelmaking sites in Rotherham, Stocksbridge, Brinsworth and Wednesbury have a future. I am keen to see them return to production, but that has to be achieved through private investment by an owner who can invest in the workforce and in the future of the business so that they put it on a long-term, sustainable footing. We know that the business environment has not been good enough for the UK’s steel industry, which is why we have already made substantial changes to secure a stronger future for it. I will say more about the steps that we have taken shortly.”<sup>1</sup>*

4.5.9 These sites therefore weren’t available at the time of site selection, but it is also clear that their intended future use, whilst uncertain, is likely to be for jobs and employment, rather than solar which is not an efficient use of scarce brownfield land.

### Interface with landowners and relevance of grid connection

4.5.10 As outlined in section 2.2, recent solar NSIP decisions have confirmed that the SoS supports the approach to site selection of the grid connection being an appropriate starting point.

4.5.11 Following the identification of the capacity and having identified that the area’s irradiance levels, topography and environmental characteristics were generally favourable to large-scale solar development (as detailed above), the Applicant sought to identify potentially suitable land parcels, having regard to a range of planning and environmental criteria. Where land parcels were considered suitable for an NSIP-scale scheme when considering the relevant criteria, the Applicant approached the respective landowners.

4.5.12 Engagement with landowners focused on securing sufficient land to deliver a scheme over 100MW to maximise the available grid connection. Where landowners were not supportive of their land being included within the Proposed Development, those parcels were discounted from further consideration. This is considered appropriate, given that it is desirable to reduce the amount of land that needs to be acquired through compulsory acquisition and that it would be difficult to justify compulsory acquisition powers if there are alternatives where landowners are providing their land willingly. If there were parcels of land where policy required the analysis of alternatives (i.e. in relation to flood risk or impact on

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<sup>1</sup> Speciality Steel UK: Insolvency, Volume 772, Hansard, 2<sup>nd</sup> September 2025

sites where the Habitats Regulations are engaged), land ownership was not the only reason for discounting sites, however, this was not the case for the Order Limits at the site selection stage.

- 4.5.13 As stated above, all sites within the 12km Search Area fell within the Green Belt, however in any case, it is considered that avoiding Green Belt would not be a reason in itself to discount an alternative in relation to the tests for compulsory purchase.
- 4.5.14 It should be noted that where landowners were in agreement with their land being included within the Order Limits, the Applicant undertook a series of site visits to further assess the suitability of the land. These site visits often resulted in agreements by both parties that not all land would be required to support the Proposed Development.
- 4.5.15 All landowners within the Order Limits relating to the solar elements of the Proposed Development have confirmed that they are agreeable in principle to leasing their land for the Proposed Development, thereby substantially limiting the need for, and potential scope of, compulsory acquisition powers. Not all landowners within the Order Limits for the cable route have agreed in principle to lease their land, although discussions remain ongoing. However, as cable routing is much less intrusive and involves disruption for only a short period of time, with the existing use generally able to continue afterwards, this was not a primary driver of site selection. The primary driver for the cable routing was to identify a technically sound solution which enables the energy created by the solar panels to be delivered to the grid as efficiently and effectively as possible.
- 4.5.16 NPS EN-1 at paragraph 4.3.23 states that the Secretary of State “...*should be guided in considering alternative proposals by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security, climate change, and other environmental benefits) in the same timescale as the proposed development*”.
- 4.5.17 The Applicant did not consider a reduced-scale scheme with lower generating capacity on a smaller site area, as such an alternative would not deliver the same level of infrastructure capacity, nor would it achieve comparable energy security and climate change benefits. Furthermore, a smaller scheme would not fully realise the opportunity presented by the secured grid connection agreement.

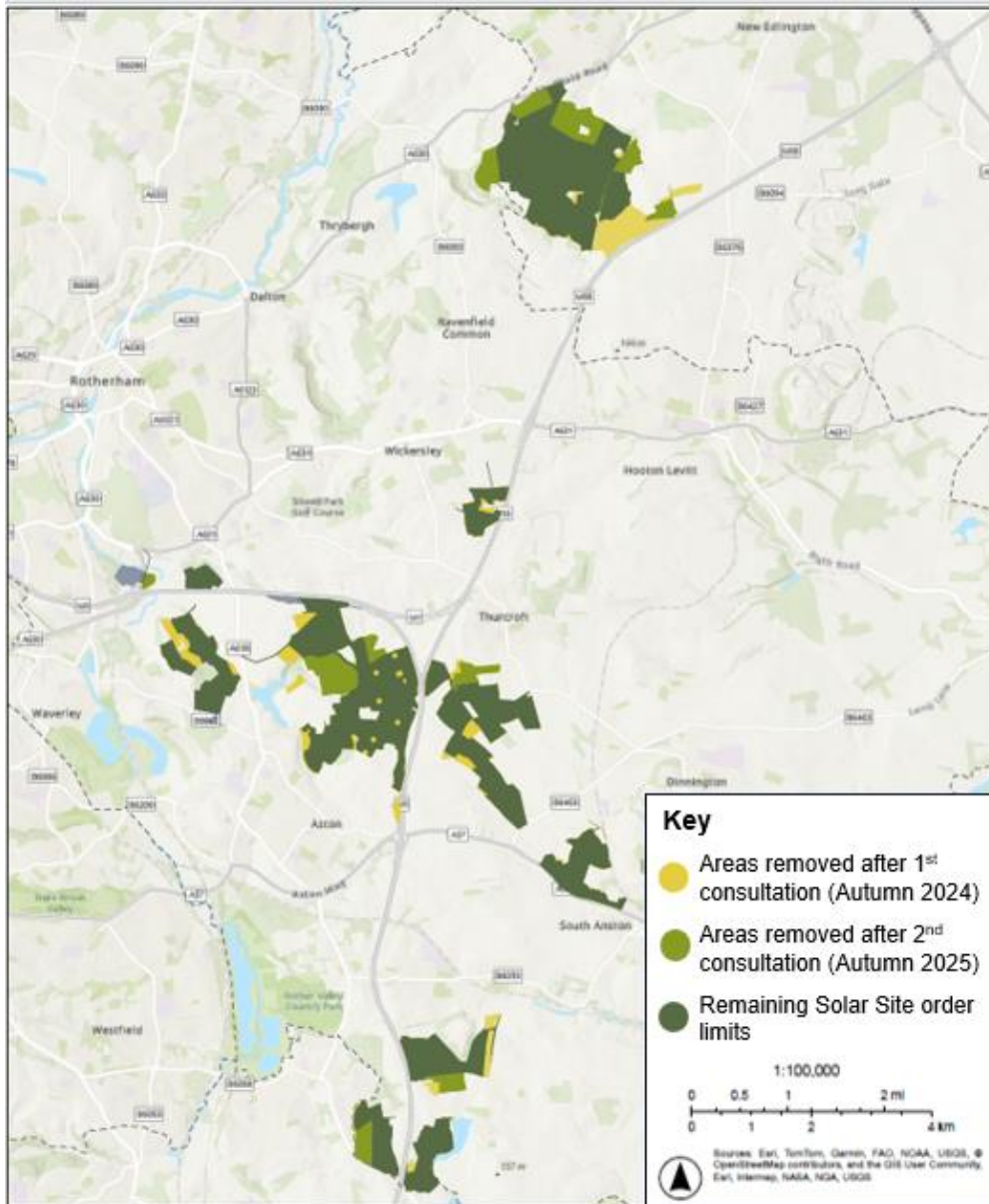
## 4.6 Stage 4 – The Proposed Development Boundary

- 4.6.1 As described above, several steps have been taken in order to finalise the location and ultimately the Order limits submitted as part of the Whitestone Solar Farm DCO. The Applicant followed a logical and sequential staged approach to inform its site selection process starting from the point of connection at the National Grid Brinsworth Substation. The Applicant sought to find land that was available and suitable for large scale solar deployment, from an irradiance and topography perspective and having regard to environmental and planning constraints.
- 4.6.2 The Applicant considered all the above considerations set out in the previous three steps and used this to identify land that met the criteria within the refined Search Area. The Applicant then sought to approach owners of this land to understand their willingness to be involved in the project. Once the willing landowners had been identified with sufficient land to meet the grid connection threshold, the initial Order limits were created and consulted upon as part of the

## APPENDIX 1 – SITE SELECTION ASSESSMENT

two-stage consultation process which the Applicant undertook as set out in the **Consultation Report [EN0110020/APP/5.1]**.

- 4.6.3 Over the course of the pre-submission stages, various changes have been made to the Order Limits presented as clearly illustrated in Figure 7 below. This iterative approach to design is explained in detail in the **Consultation Report [EN0110020/APP/5.1]** and **Design Approach Document [EN0110020/APP/5.7]**.



**Figure 7 – Changes to the Order Limits during pre-submission**

- 4.6.4 Although the primary reasons for the changes to the Order Limits are set out in the **Consultation Report [EN0110020/APP/5.1]** and **Design Approach Document [EN0110020/APP/5.7]**, and illustrated on Figure 7, they include:

- Provision of greater buffers from Public Rights of Way - offsets from Public Rights of Way were expanded, with one side of several routes intentionally kept open. This change responds directly to feedback received throughout the process which emphasised the recreational importance of these paths.

## APPENDIX 1 – SITE SELECTION ASSESSMENT

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- Greater offsets in proximity to hamlets and villages - minimising effects on settlements and residents has been a consistent design priority for the project. Significant areas of developable land were removed between Masterplan 1 and Masterplan 2, and further refinements were made in Masterplan 4 following statutory consultation, during which additional site visits to residential properties and further fieldwork was conducted.
- Refining the extent of mitigation and enhancement land - the project sought to make efficient use of land. The extent of solar proposed across the Order Limits was reduced during the iterative design process spanning Masterplan 1 to Masterplan 4. Where solar was removed, the land was typically then shown to be landscape mitigation and enhancement. The extent of this land was reviewed through the development of Masterplan 4. Where there was not a clear rationale for the inclusion of mitigation land, identified as Work No. 6, the land was removed from the Order Limits. Similarly, where environmental effects could be mitigated or compensated through alternative means that would require a lower land take, these opportunities were taken. This allows the retention of more land within the agricultural regime.

## 5 SUMMARY OF FINDINGS

- 5.1.1 Section 3 of this report provides the policy framework and the Applicant's general approach to site selection and, where relevant, details relating to compliance with policy. Section 4 has reported on the detail of the site selection process itself based on its project objectives. It has responded directly to the key policy requirements and tests. It demonstrates that the Applicant has followed a logical and robust process in determining the location for the Proposed Development from the selection of an appropriate region within the UK to focus an initial search on to the reasoning for seeking consent on land which is subject to this Application.
- 5.1.2 In consideration of the merits of the Applicant's approach, it is important to reiterate the context of the relevant NPS policy. Paragraph 4.3.9 of EN-1 states that it is not for the SoS to establish whether the proposed project represents the best option from a policy perspective. Further at 4.2.24, EN-1 states that the SoS should not refuse an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site and should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals.
- 5.1.3 The Applicant considers it has demonstrated that its site selection process is robust, and that the location of the Proposed Development is suitable from a policy perspective.
- 5.1.4 The Site:
- Has secured a Gate 2 Phase 1 prioritisation (i.e. in 2030 or earlier) for the solar component of the Proposed Development, meaning that the Proposed Development is strategically aligned with the clean power capacity ranges established in the Clean Power 2030 Action Plan
  - Has sufficient land to enable the grid connection offer to be utilised while maintaining sufficient offsets to sensitive residential receptors;
  - Is located away from key environmental related designations, where possible;
  - Is located within an area already hosting major infrastructure, including two motorways, pylons and wind turbines; and
  - Is accessible from the road network, with many roads providing direct access into the Site and has suitable access to land not immediately adjacent to the strategic road network.
- 5.1.5 Although the Site is located entirely in the Green Belt (due to this designation covering all of the undeveloped land in the Search Area) it is considered that it meets the definition of grey belt and in any case, Very Special Circumstances exist to justify this. This is addressed in **Appendix 2: Green Belt Assessment of the Planning Statement [EN0110020/APP/5.5]**.
- 5.1.6 The Applicant therefore considers that it has demonstrated compliance with the relevant site selection criteria set out in EN-1 and EN-3.



**WHITESTONE**  
solar farm

# **WHITESTONE SOLAR FARM**

## **Appendix 2: Green Belt Assessment**

## APPENDIX 2 - GREEN BELT ASSESSMENT

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Document status					
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**Prepared by:**

**DWD LTD**

**Prepared for:**

**Whitestone Net Zero Ltd**

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1	Order Limits within South and West Yorkshire Green Belt Designation
2	Whitestone parcels as split for the grey belt assessment in Table 2.2

# 1 INTRODUCTION

## 1.1 Overview and Purpose of the Document

1.1.1 This Appendix satisfies three principal purposes:

- Firstly, it provides an explanation as to why the Green Belt land within the Order Limits should be considered 'grey belt';
- Secondly, it provides reasons why the Proposed Development satisfies the policy tests for being 'not inappropriate' development in the grey belt; and
- Thirdly, if the above positions are not agreed, and the Proposed Development is thus considered inappropriate development, it provides a complete assessment of the harm to the Green Belt and provides very special circumstances that outweigh any identified harm.

1.1.2 This Report therefore provides an assessment of why the Green Belt land within which the Proposed Development is located should be considered as grey belt in compliance with the definition in the Glossary of the NPPF<sup>1</sup> and why the Proposed Development satisfies the policy tests for being 'not inappropriate' in the grey belt with reference to the NPPF as set out within the **Planning Statement [EN0110020/APP/5.4]**. As discussed within various DCO submission documents, the Proposed Development (see **ES Volume 1, Chapter 5: The Proposed Development [EN0110020/APP/6.5]**), is Critical National Priority (CNP) infrastructure. As stated in NPS EN-1 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.

1.1.3 To ensure a robust approach however, this Appendix also provides an assessment of harm against the five Green Belt purposes, as well as harm to openness, and explains the very special circumstances that exist that outweigh any harm that may be considered to arise to the Green Belt as a result of the Proposed Development. This is in accordance with paragraph 153 of the NPPF and NPS EN-1, should the grey belt position not be agreed.

## 1.2 Proposed Development

1.2.2 This Proposed Development is defined as a Nationally Significant Infrastructure Project (NSIP) and will require a Development Consent Order (DCO) from the Secretary of State for Energy Security and Net Zero due to its generating capacity exceeding 100 megawatts (MW).

1.2.3 For a full description of the Proposed Development, see **ES Volume 1, Chapter 5: The Proposed Development [EN0110020/APP/6.5]**.

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<sup>1</sup> grey belt: For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. '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.

- 1.2.4 The location of the Order Limits is shown on the submitted **Location, Order Limits and Grid Coordinates Plan [EN0110020/APP/2.1]** and described in **ES Volume 1, Chapter 3: Site and Surrounding Area [EN0110020/APP/6.3]**.
- 1.2.5 Due to the scale of the Proposed Development being set across four administrative boundaries, comprising City of Doncaster (CDC), Rotherham Metropolitan Borough Council (RMBC), North East Derbyshire District Council (NEDDC) and Derbyshire County Council (DCC), for the purpose of Environmental Impact Assessment (EIA), the Site has been split into three distinct areas. These areas are referred to as:
- Whitestone 1 (W1);
  - Whitestone 2 (W2); and
  - Whitestone 3 (W3).

### Proposed Development within the Green Belt

- 1.2.6 The Order Limits, as illustrated on the **Location, Order Limits and Grid Coordinates Plan [EN0110020/APP/2.1]** and described in **ES Volume 1, Chapter 3: Site and Surrounding Area [EN0110020/APP/6.3]**, is wholly located within the South and West Yorkshire Green Belt designation.

## 1.3 Identified Need

- 1.3.3 The UK cannot meet its energy security needs or its net zero obligations without rapidly expanding low-carbon energy generation. This is further clarified by the UK Government policy within NPS EN-1 paragraph 4.2.2. Wind and solar offer the lowest-cost electricity available today, cutting bills while delivering clean, secure power that is not dependent on volatile fuel markets. Government analysis confirms that by 2050, a reliable, affordable, net zero energy system will rely primarily on wind and solar as noted at NPS EN-1 paragraph 3.3.20.
- 1.3.4 The Whitestone Solar Farm will play a pivotal role in assisting the UK Government to meet its net zero targets by 2050 and the decarbonisation needs of the UK as set out in further detail within the **Statement of Need [EN0110020/APP/5.8]**.

## 1.4 Policy Context

### Overarching National Policy Statement for Energy (2025) (NPS EN-1)

- 1.4.1 The UK Government has committed to delivering the Clean Power 2030 Action Plan in order to meet the 2050 net zero goals. The objectives for meeting the Clean Power 2030 Mission are to ensure a secure, reliable, affordable energy supply which is consistent with meeting the target to cut GHG emissions to net zero by 2050. Over half of energy demand in 2050 could be met by electricity as transport and heating in particular shift from fossil fuel to electrical technology. In order for the UK to meet these net zero goals for low carbon energy, it is essential that renewable and nuclear power generation is deployed, alongside hydrogen and CCUS.
- 1.4.2 The NPSs confirm that large-scale ground mounted solar farms have a critical role to play in achieving the government's energy policy aims of delivering a secure, low carbon and low-cost electricity supply for consumers on the way to delivering net zero carbon emissions by 2050. The NPSs establish that there is a critical national priority (CNP) for low carbon infrastructure, including for large-scale solar

farms, because of the decarbonisation, energy security, and affordability benefits that they deliver. NPS EN-1 notes at paragraph 4.2.29 and 4.2.30 that the Secretary of State will take as the starting point for decision-making that CNP infrastructure has met any tests set out in the NPS such as the very special circumstances test to justify development in the Green Belt.

- 1.4.3 NPS EN-1 paragraph 5.11.2 notes that the fundamental aim of the 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 EN-1 defers to the NPPF for further information regarding the Green Belt which is noted below.
- 1.4.4 Paragraph 5.11.20 notes that inappropriate development “*should not be approved except in very special circumstances. Applicants should therefore determine whether their proposal, or any part of it, is within an established Green Belt and, if it is, whether their proposal may be inappropriate development within the meaning of Green Belt policy*”.
- 1.4.5 In terms of the types of renewable energy works, paragraph 5.11.22 goes on to note that underground pipelines may not be considered as inappropriate within the Green Belt as they are considered an ‘engineering operation’; and preserve the openness of the Green Belt while not conflicting with the purposes of the designation. It is considered that this equally applies to underground cabling works.

As discussed below within the NPPF, when an application is thought to be inappropriate development it should be supported by a very special circumstances assessment. With paragraph 5.11.37 of the NPS EN-1 noting “*when considering any planning application affecting Green Belt land, the Secretary of State should ensure that substantial weight is given to any harm to the Green Belt when considering any application for such development, while taking account, in relation to renewable and linear infrastructure, of the extent to which its physical characteristics are such that it has limited or no impact on the fundamental purposes of Green Belt designation. Very special circumstances may include the wider environmental benefits associated with increased production of energy from renewables and other low carbon sources*”.

### National Planning Policy Framework (2025) (NPPF)

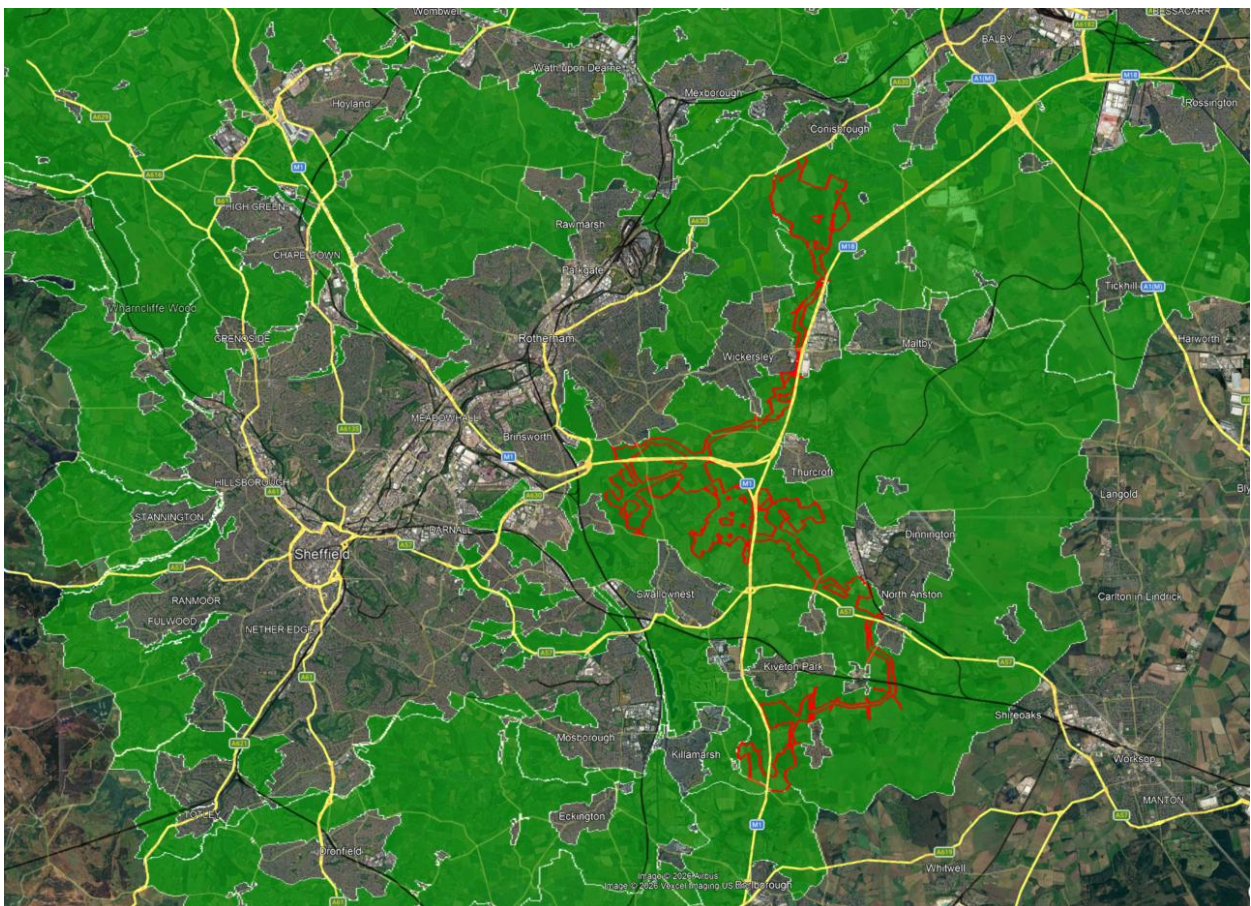
- 1.4.6 Throughout the National Planning Policy Framework (NPPF) the Government attaches great importance to Green Belts. As noted within paragraph 142, “*the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence*”.
- 1.4.7 The Green Belt serves five purposes, as set out in NPPF paragraph 143:
- a) To check the unrestricted sprawl of large built-up areas;
  - b) To prevent neighbouring towns merging into one another;
  - c) To assist in safeguarding the countryside from encroachment;
  - d) To preserve the setting and special character of historic towns; and
  - e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 1.4.8 As set out at NPPF paragraph 153, inappropriate development is, by definition, harmful to the Green Belt, with the NPPF making it clear that most new building is

considered as inappropriate in the Green Belt and should be refused permission unless in very special circumstances (VSC). It goes on to state in the same paragraph (153) that VSC “*will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations*”.

- 1.4.9 Finally, paragraph 160 notes that elements of many renewable energy projects located in the Green Belt will comprise inappropriate development. If this is the case, then developers will need to demonstrate VSC if projects are to proceed. Such VSC may include the wider environmental benefits associated with increased production of energy from renewable sources.
- 1.4.10 Grey belt is defined within Annex 2 of the NPPF as “*for the purposes of plan-making and decision-making, ‘grey belt’ is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘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.*”.

## 1.5 Site Location within the Green Belt

- 1.5.5 As outlined in **Appendix 1 – Site Selection Assessment** of the **Planning Statement [EN0110020/APP/5.4]**, and in **Figure 1** below, the Site is entirely located within the South and West Yorkshire Green Belt.



**Figure 1 – Order Limits within South and West Yorkshire Green Belt Designation**

- 1.5.6 Whilst the starting point for the site selection approach was to avoid or minimise the use of Green Belt where possible, when looking to focus the Proposed Development within the South Yorkshire region, specifically as close as possible to the Point of Connection (POC) at the existing Brinsworth National Grid Substation, the Applicant noted that the majority of the undeveloped land around the substation, and within the 12km Search Area was located within the South and West Yorkshire Green Belt. The POC was initially identified because of the available capacity to accommodate an NSIP scale solar farm. As emphasised in the **Statement of Need [EN0110020/APP/5.8]**, such connections with capacity are limited and all available capacity should therefore be used to make sure that the UK meets and exceeds its renewable energy targets. As highlighted in **Appendix 1 - Site Selection Assessment of the Planning Statement [EN0110020/APP/5.4]**, an initial site assessment was undertaken which identified that a 12km radius from the POC was the most appropriate Search Area for potential development sites for the Proposed Development. If a decision was made to locate the Proposed Development outside of the Green Belt, the closest development parcel would be approximately 15km from the POC, with the other parcels well beyond this range.
- 1.5.7 Other reasons for progressing with development within the Green Belt (as expanded on in the Site Selection Assessment and summarised below) comprised:
- Short cable route and associated benefits in terms of cost, programme and connection date – if a site outside the Green Belt had been selected, it would have had significant implications for deliverability in terms of programme and cost. Therefore, choosing a site closer to the POC helps to minimise these risks and reduce potential delays for connecting to the national grid and additional expenses.
  - A project connected at Brinsworth, but located outside of the Green Belt, would need to be at least 15km, in a straight line, from the POC to the closest development parcel. A location at this distance would encroach onto land identified by Defra and Natural England as having a higher grade ALC, in addition this would significantly increase the cable route length, require substantially more land to deliver the solar farm, and extend development complexity.
  - Sites at a greater distance are in closer proximity to other substations and so would not be making the use of the available capacity at Brinsworth – there are approximately nine other substations within the wider area. Sites at greater distances would be better suited to connecting to these substations, for cost, programme and disruption reasons, and therefore to utilise the existing capacity at Brinsworth a site closer would be best suited.
  - Potential cumulative impact with other solar NSIPs for land further from POC – as illustrated in Figure 05 of the Site Selection Report at **Appendix 1 of the Planning Statement [EN0110020/APP/5.4]**, several NSIP schemes are currently at pre-application, examination, or determination stages within the wider region. Sites located east of the Brinsworth substation POC would move closer to the cluster of NSIPs around locations such as Gainsborough and Gate Burton, increasing cumulative considerations.
  - To include areas of Grade 3 and 4 agricultural land and to avoid a belt of Grade 2 – Land to the east of the Proposed Development is more constrained

by environmental factors, including a higher prevalence of Grade 2 agricultural land, which is less preferable for energy infrastructure development in accordance with relevant planning policy.

- 1.5.8 For further information on the site selection process and alternatives considered, see **Appendix 1 – Site Selection Assessment** of the **Planning Statement [EN0110020/APP/5.4]** and **ES Volume 1, Chapter 4: Alternatives and Design Evolution [EN0110020/APP/6.4]**.

## 2 LOCAL PLANNING AUTHORITY - EVIDENCE BASE

2.1.1 As a starting point for assessing the land within the Green Belt, and how strongly it contributes to the purpose of being within it, published information by the LPAs have been considered by the Applicant. The following documents have been reviewed and the findings set out below in detail:

- Rotherham Metropolitan Borough Council Strategic Green Belt Review 2012; and
- North East Derbyshire District Council Green Belt Review 2017.

2.1.2 The Applicant could find references to a 'Green Belt Review' by the City of Doncaster but the document is not publicly available and, as such the parcels of land within Whitestone 1 are not included in the analysis below, but they are still included in the Applicant's assessment later in this document. The Applicant has asked the Council for a copy and an assessment against published information could be provided if appropriate upon receipt.

### 2.2 Rotherham Metropolitan Borough Council Strategic Green Belt Review 2012

2.2.1 A Strategic Green Belt Review was undertaken by Rotherham Metropolitan Borough Council (RMBC) in 2021 to support the preparation of the Rotherham Local Plan. The aim of the strategy was to consider the importance of each parcel (part) of the Green Belt in meeting Green Belt purposes as set out in the NPPF. In doing so it helped to identify those parcels (part) of land in the Green Belt that should be kept "open" in order to maintain the integrity of the Green Belt.

2.2.2 The Study was comprised of two stages:

- Stage 1: Sub-division of Rotherham's Green Belt into logical parcels for the purpose of assessment.
- Stage 2: Assessment of every parcel against the five purposes of including land in the Green Belt.

2.2.3 At the time of the review in 2012, NPPF paragraph 80 listed the five purposes of Green Belt, which remain the same as the five purposes (a-e) set out in the current NPPF (December 2024):

1. to check the unrestricted sprawl of large built-up areas.
2. to prevent neighbouring towns from merging into one another.
3. to assist in safeguarding the countryside from encroachment.
4. to preserve the setting and special character of historic towns.
5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

2.2.4 The review states at paragraph 5.49 *"it is the overall restrictive nature of Green Belt that, through its limitation of the supply of other development opportunities, encourages regeneration and re-use of land at a strategic level. It is considered*

*impossible to judge how any given parcel of land within the Green Belt would contribute to the fulfilment of this purpose. This purpose has therefore not been assessed on an area by area basis. This relationship will be determined through the Core Strategy DPD, Sites and Policies DPD or individual planning applications.”*

- 2.2.5 As such, purpose 5 (e) in current NPPF) is not included in the summary of published information below, but it is relevant to note that in relation to this particular purpose, NSIP scale solar is generally not suited to derelict and urban land, because of the scale of land required and that making best use of brownfield sites in accordance with policy supports higher density development on these sites than would generally be the case with ground-mounted solar.
- 2.2.6 The Applicant has therefore identified which logical numbered parcels relate to the Proposed Development and Order Limits, and how RMBC has assessed each parcel against the five purposes of the Green Belt, which is set out in summary below in **Table 2.1**.
- 2.2.7 Whitestone 1 is wholly located within CDC administrative boundary, so is not included in the analysis below, which only includes Whitestone 2 and 3.

**Table 2.1 RMBC Green Belt Assessment Summary**

Whitestone parcel	LPA parcel number	LPA assessment purposes 1 and 3 <sup>2</sup>	LPA assessment purposes 2 and 4 <sup>3</sup>
Whitestone 2	70, 81, 82, 107, 111, 112, 115, 116	All parcels make a ‘major contribution’ to these purposes, with the exception of parcel 115 which only makes a ‘moderate contribution’.	All parcels make a ‘slight / negligible’ contribution to these purposes, with the exception of parcel 70 which makes a ‘moderate contribution’.
Whitestone 3	94-96	All parcels make a ‘major contribution’ to these purposes	All parcels make a ‘slight / negligible’ contribution to these purposes

- 2.2.8 Based on the assessment from RMBC set out in the Strategic Green Belt Review, it is considered that the LPA’s own review identifies that the land within Whitestone 2 and 3 makes a slight/negligible contribution towards purposes 2 and 4 of the Green Belt (purposes b) and d) in the current NPPF). The Applicant is seeking to agree this position with RMBC through discussions on the draft Statement of Common Ground.

## 2.3 North East Derbyshire District Council Green Belt Review 2017

- 2.3.1 The Northeast Derbyshire District Council (NEDDC) Green Belt Review 2017 has been considered by the Applicant, however only the southern access point of the Order Limits to allow for access works and the cable corridor is included in the administrative boundary of NEDDC. The access road is an A road which is previously developed land and there will be no solar panels or above ground

<sup>2</sup> (a) and c) in current NPPF)

<sup>3</sup> (b) and d) in current NPPF)

## APPENDIX 2 - GREEN BELT ASSESSMENT

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infrastructure within its boundary, so no further analysis of the Green Belt Review has been undertaken for the purposes of this assessment.

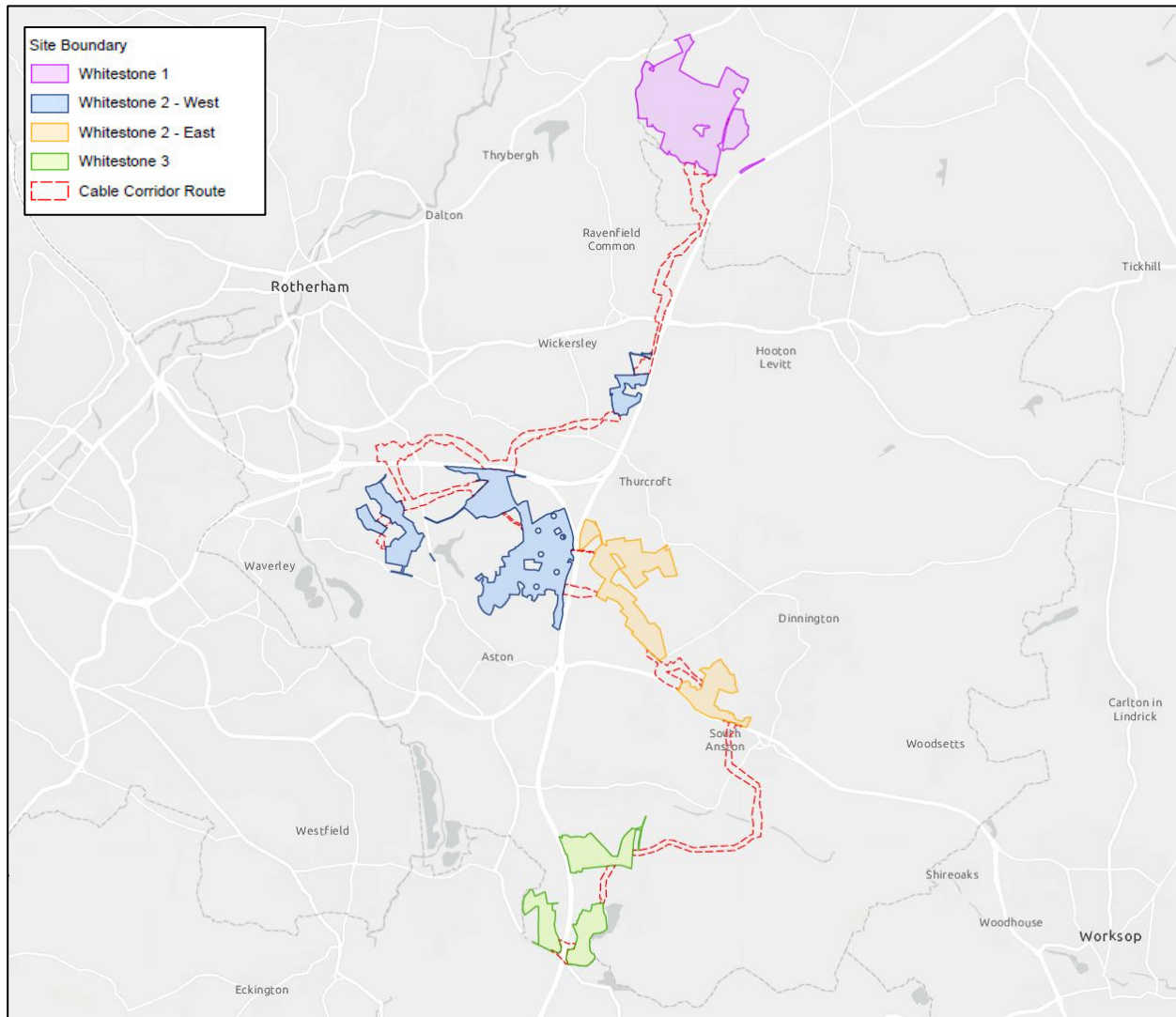
## 3 GREY BELT ASSESSMENT

### 3.1 Consideration of grey belt

- 3.1.1 According to the NPPF (Glossary on page 73), grey belt is defined as land within the Green Belt that:
- a. Does not strongly contribute to Green Belt purposes (a), (b) or (d)<sup>4</sup>; and
  - b. The application of policies in footnote 7 of the NPPF (other than Green Belt) do not provide a strong reason for refusing development.
- 3.1.2 The application of policy in the NPPF at paragraph 155 prescribes that development of grey belt land may not be considered as inappropriate where all of the following elements are demonstrated:
- The site is grey belt as per the definition in the Glossary;
  - Development of the site would not fundamentally undermine the purposes of the remaining Green Belt as set out in paragraph 143;
  - There is demonstrable unmet need for the development proposed;
  - The site is in a sustainable location; and
  - The site meets the 'Golden Rules' where applicable.
- 3.1.3 The following sections set out an assessment of the grey belt tests which are applicable to the Proposed Development of Whitestone Solar Farm. It is noted that test e) (the Golden Rules) applies only to housing development, and as such does not relate to solar development and has not been assessed below.
- 3.1.4 As set out above and shown in **Figure 2** below the Site has been split into four distinct areas. These areas are referred to as:
- Whitestone 1 (W1);
  - Whitestone 2 (W2) (split into East and West for the purposes of the assessment below); and
  - Whitestone 3 (W3).

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<sup>4</sup> For ease of reference these are a) to check the unrestricted sprawl of large built-up areas; (b) to prevent neighbouring towns from merging into one another and (d) to preserve the setting and special character of historic towns.



**Figure 2 – Whitestone parcels as split for the grey belt assessment in Table 2.2**

- 3.1.5 The below assessment takes each distinct area in turn and assesses these parcels against the grey belt tests in order to confirm if they meet these tests and can be considered grey belt for the purposes of this DCO Application and relevant assessments.
- 3.1.6 An assessment has not been carried out on whether the land within the Cable Corridor would meet the definition of grey belt, as all the works in this area would be underground and thus ‘not inappropriate’ development by definition (see further analysis in Section 4).

## 3.2 Grey belt Definition Assessment

- 3.2.1 The definition of ‘grey belt’ is included in the Glossary on page 73 of the NPPF and states:

*“Grey belt: For the purposes of plan-making and decision-making, ‘grey belt’ is defined as land in the Green Belt comprising previously developed land and/or*

*any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. '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."*

3.2.2 The table below considers each area against the definition of 'grey belt' in the NPPF, and a summary of conclusions is included underneath the table. The Applicant has used the methodology set out in the Planning Practice Guidance (PPG) Paragraph: 005 Reference ID: 64-005-20250225 to assess the contribution of each parcel to purposes (a), (b) and (d).

### Definition of Towns / Large-Built-up Areas

3.2.3 The Applicant has sought to define the 'Towns' and 'Large Built-Up Areas' (LBUsAs) using the relevant Local Planning Authority documents, in this case:

- Rotherham Core Strategy 2014;
- Rotherham Metropolitan Borough Council Strategic Green Belt Review 2012;
- Doncaster Council Core Strategy 2011-2026;
- North East Derbyshire District Council Development Local Plan 2014 – 2034; and
- North East Derbyshire District Council Green Belt Review 2017.

3.2.4 The Green Belt PPG [Paragraph 005 Reference ID: 64-005-20250225] states that villages should not be considered large built-up areas and that purposes b and d relate only to towns. As such, for the purpose of this assessment, settlements that are considered towns in the context of purposes b and d are also considered large built-up areas in the context of purpose a.

3.2.5 Towns / LBUA in Doncaster (as specified on the Key Diagram in Doncaster Council Core Strategy 2011-2026):

- Conisbrough.

3.2.6 Towns / LBUA in Rotherham (as set out at paragraph 5.40 in the Green Belt Review):

- Thurcroft;
- Brinsworth (included in the Rotherham Urban Area);
- Whiston (included in the Rotherham Urban Area);
- Dinnington, Anston and Laughton Common (grouped);
- Bramley, Wickersley and Ravenfield Common (grouped);
- Wales and Kiveton Park (grouped); and
- Aston, Aughton and Swallownest (grouped).

3.2.7 Towns / LBUA in Derbyshire (as set out at paragraph 5.40 of Rotherham Metropolitan Borough Council Strategic Green Belt Review 2012 and paragraph 3.9 of North East Derbyshire District Council Green Belt Review 2017):

- Killamarsh.

3.2.8 However, as set out above, the Green Belt PPG [Paragraph 005 Reference ID: 64-005-20250225] states that villages should not be considered large built-up areas and that purposes b and d relate only to towns. The Green Belt Review documents referenced above pre-date the PPG Guidance which is now clear on

## APPENDIX 2 - GREEN BELT ASSESSMENT

the criteria for large built-up areas/towns and that an assessment of villages is not required. The Applicant has therefore reviewed the list above and based on the PPG guidance, has only assessed the following large built-up areas, and towns as per the most recent Guidance:

- Conisbrough;
- Brinsworth (included in the Rotherham Urban Area);
- Whiston (included in the Rotherham Urban Area);
- Bramley, Wickersley and Ravenfield Common (grouped); and
- Dinnington, Anston and Laughton Common (grouped).

**Table 2.2 Grey Belt Definition Assessment**

NPPF grey belt Test	Considerations
<u>Whitestone 1</u>	
Footnote 7 <sup>5</sup>	<p>W1 does not contain any habitats sites, including any SACs, SPAs or Ramsar sites or SSSIs.</p> <p>W1 does not contain any area of Local Green Space or Ancient Woodland and is not designated as a National Landscape or Heritage Coast.</p> <p>W1 does not contain any designated heritage assets or Conservation Areas.</p> <p>There are no areas of Flood Zone 2 and 3 within W1, which is located within Flood Zone 1.</p> <p>It is not considered that any of the exceptions outlined in footnote 7 apply to W1 and therefore would not restrict the area being classified as grey belt.</p>
143 (a) to check the unrestricted sprawl of large built-up areas	Purpose a seeks to check the unrestricted sprawl of large built-up areas, with the PPG stating that villages should not be considered 'large built-up areas' in this context, only towns and cities (Paragraph: 005 Reference ID: 64-005-20250225).

<sup>5</sup> The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change

## APPENDIX 2 - GREEN BELT ASSESSMENT

NPPF grey belt Test	Considerations
	<p>As set out above, the only 2 towns that are in proximity to W1 are Conisbrough and Wickersley, with Conisbrough located adjacent to the north of W1 and Wickersley located approximately 1.5km away from W1 to the south.</p> <p>W1 is located to the south of the edge of Conisbrough, which is permanently separated from the Site by the A630 and existing mature planting and hedgerows along the A630 in both directions. Only a small section (approximately 60m section of the Order Limits in length) of W1 is adjacent to the built-up area of Conisbrough, with the rest of W1 located at least 300m away with large parcels of Green Belt either side of the Order Limits which do check the unrestricted sprawl of Conisbrough.</p> <p>Due to its proximity to Conisbrough, it is considered that if the Site was developed, it could potentially result in an incongruous pattern of development out into the countryside.</p> <p>There are however physical features in reasonable proximity, including the A630 to the north, the wooded corridor of the Firsby Brook to the west, the wooded corridors of the Kearsley Brook and the disused railway to the east, the M18 to the south, as well as other existing mature hedgerows and tree belts that would restrict and contain the development of W1.</p> <p>The predominance of the Thurcroft Interchange (J32) which comprises the M18 and M1 is a strong urbanising influence in the local area and a large stretch of the M18 is located in close proximity to the south of W1, 300m away, which has some urbanising influence.</p> <p>Bramley, Wickersley and Ravenfield Common (grouped) is also considered to be a town, or 'large built-up area' in the context of purpose a, however the very outer edge is located over 1.5km to the south of W1. As such, it is not considered that W1 contributes strongly to this purpose in relation to Wickersley due to development of W1 not being perceived as sprawl associated with Wickersley.</p> <p>Considering W1 is either already separated by physical features and urbanising influences such as permanent road corridors (which would contain any future development) or is located a significant distance away from existing large built-up areas, it is not considered that W1 contributes strongly to this purpose of the Green Belt.</p>

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NPPF grey belt Test	Considerations
143 (b) to prevent neighbouring towns merging into one another	<p>As set out above, the only 2 towns that are in proximity to W1 are Conisbrough and Wickersley, with Conisbrough located adjacent to the north of W1 and Wickersley located approximately 1.5km away from W1 to the south.</p> <p>Currently there is a distance of approximately 3.7km between Conisbrough and Wickersley at the closest points. In addition to this large physical separation, there are also existing mature hedgerows and mature planting, water bodies such as Firsby Reservoir and Firsby Brook and large areas of dense woodland that preserve the visual separation between the towns.</p> <p>W1 does not play an important role in this separation, and only forms a small part of the gap, with many other Green Belt parcels fulfilling this purpose of the Green Belt without W1.</p>
143 (d) to preserve the setting and special character of historic towns	<p>As set out in the PPG, this purpose relates to historic towns, not villages (Paragraph: 005 Reference ID: 64-005-20250225). As set out above, the only 2 towns that are in proximity to W1 are Conisbrough and Wickersley, with Conisbrough located adjacent to the north of W1 and Wickersley located approximately 1.5km away from W1 to the south.</p> <p>It is not considered that W1 strongly contributes to this purpose of the Green Belt because W1 sits in proximity to the external edge of Conisbrough, which is characterised by 1950s dwellings, with the historic centre of Conisbrough including the Conservation Area and the Grade I Listed Conisbrough Castle located over 1km to the east. In addition, the settings assessment (<b>ES Volume 3, Appendix 8.4: Assessment of Indirect Effects to Setting [EN0110020/APP/6.20]</b>) has confirmed that W1 would not be visible from within the Conservation Area, or at ground floor level at the Castle, with the notable exception of from the upper storeys of the castle Keep.</p> <p>With regards to Wickersley, W1 is located 1.5km from Wickersley, and as such it is not considered that the Site contributes to the preservation of the setting or special character of Wickersley.</p> <p>It is therefore not considered that W1 forms part of the setting of a historic town or has a visual, physical, or experiential connection to the historic aspects of the towns. It is therefore not considered that W1 contributes strongly to this purpose of the Green Belt.</p>
<b>Whitestone 2 East (W2E)</b>	
Footnote 7	W2E does not contain any habitats sites, including any SACs, SPAs or Ramsar sites or SSSIs.

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NPPF grey belt Test	Considerations
	<p>W2E does not contain any area of Local Green Space or Ancient Woodland and is not designated as a National Landscape or Heritage Coast.</p> <p>W2E does not contain any designated heritage assets or Conservation Areas.</p> <p>There are small areas of Flood Zone 2 and 3 within W2E – however the Flood Risk Assessment confirms that there would be no overall increased risk of flooding, and the Proposed 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. As such, this alone would not provide a strong reason for refusing or restricting development. It is also recognised that the latest NPPF consultation proposes to remove Footnote 7 from the grey belt definition, as it was considered that this approach applied unnecessary layers of protection to these assets and also meant that grey belt could only be provisionally identified before considering the impact of specific development proposals, which is an important consideration.</p> <p>It is not considered that any of the exceptions outlined in footnote 7 apply to W2E and therefore would not restrict the area being classified as grey belt.</p>
<p>143 (a) to check the unrestricted sprawl of large built-up areas</p>	<p>As set out above, the PPG states that villages should not be considered 'large built-up areas' in this context, only towns and cities (Paragraph: 005 Reference ID: 64-005-20250225). As such, the towns or LBUA considered in this assessment are Dinnington, Anston and Laughton Common (grouped).</p> <p>W2E has 2 distinct parcels within it, all of which are located in proximity to the M1/M18 junction 32 (Thurcroft Interchange) which is a major motorway junction/corridor in South Yorkshire near Thurcroft.</p> <p>The most easterly parcel of W2E abuts South Anston to the north of the A57 and is also in proximity to North Anston to the east. However, the parcels abut the North Anston Trading Estate, with the main LBUA separated from W2E by the railway line which runs north to south along the eastern boundary of W2E, and additional fields of Green Belt land, which restrict and contain the development from the LBUA identified. The eastern most parcel of W2E is also contained on the west by the A57 which runs along the</p>

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NPPF grey belt Test	Considerations
	<p>entirety of the development parcel, restricting and containing development to the west.</p> <p>As such, the area is characterised by major motorway corridors and junctions, and given the existing urban development and physical features it is not considered that the development of W2E would represent incongruous development in the countryside.</p> <p>As such, it is not considered that W2E contributes strongly to this purpose of the Green Belt.</p>
<p>143 (b) to prevent neighbouring towns merging into one another</p>	<p>As set out above, the towns considered in this assessment in relation to W2E are Dinnington, Anston and Laughton Common (grouped). There are no parcels of W2E proposed within the gap between the towns, and the other nearby towns are a significant distance away separated by the M1 and M18 corridor.</p> <p>It is therefore not considered that W2E contributes strongly to this purpose of the Green Belt. This has been agreed by RMBC in the most recent Strategic Green Belt 6review which confirms that these parcels of land make a 'slight /negligible' contribution to this purpose of the Green Belt.</p>
<p>143 (d) to preserve the setting and special character of historic towns</p>	<p>As set out in the PPG, this purpose relates to historic towns, not villages (Paragraph: 005 Reference ID: 64-005-20250225). As set out above, the towns considered in this assessment in relation to W2E are Dinnington, Anston and Laughton Common (grouped).</p> <p>Anston is the closest settlement to W2E, adjoining the parcels in a very small area to the east of W2E, which is split into North and South Anston. The settings assessment (<b>ES Volume 3, Appendix 8.4: Assessment of Indirect Effects to Setting [EN0110020/APP/6.20]</b>) confirms that North and South Anston are of medieval origin and feature two Conservation Areas and a number of listed heritage assets, however the modern village encircles this historic core of both settlements, which is later 20th Century development.</p> <p>W2E would be located, at its closest, 300m north-west of the South Anston Conservation Area, and 40m south-west of the north Anston Conservation Area and there is no visibility of W2E from either Conservation Area or historic centre. The main LBUA is separated</p>

<sup>6</sup> <https://www.rotherham.gov.uk/downloads/file/652/detailed-green-belt-review-2016>

## APPENDIX 2 - GREEN BELT ASSESSMENT

NPPF grey belt Test	Considerations
	<p>from W2E by the railway line which runs north to south along the eastern boundary of W2E, and additional fields of Green Belt land. As such, there is no visual, physical, or experiential connection to the historic aspects of the town and it is therefore considered that W2E does not contribute strongly to this purpose of the Green Belt.</p> <p>This has been agreed by RMBC in the most recent Strategic Green Belt 7 review which confirms that these parcels of land make a 'slight /negligible' contribution to this purpose of the Green Belt.</p>
<b>Whitestone 2 West (W2W)</b>	
Footnote 7	<p>W2W does not contain any habitats sites, including any SACs, SPAs or Ramsar sites or SSSIs.</p> <p>W2W does not contain any area of Local Green Space or Ancient Woodland and is not designated as a National Landscape or Heritage Coast.</p> <p>W2W does not contain any designated heritage assets or Conservation Areas.</p> <p>There are small areas of Flood Zone 2 and 3 within W2W – however the Flood Risk Assessment confirms that there would be no overall increased risk of flooding, and the Proposed 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. As such, this alone would not provide a strong reason for refusing or restricting development. It is also recognised that the latest NPPF consultation proposes to remove Footnote 7 from the grey belt definition, as it was considered that this approach applied unnecessary layers of protection to these assets and also meant that grey belt could only be provisionally identified before considering the impact of specific development proposals, which is an important consideration.</p> <p>It is not considered that any of the exceptions outlined in footnote 7 apply to W2W and therefore would not restrict the area being classified as grey belt.</p>
143 (a) to check the unrestricted sprawl of large built-up areas	As set out above, the PPG states that villages should not be considered 'large built-up areas' in this context, only towns and cities (Paragraph: 005 Reference ID: 64-005-20250225). As such, the towns or LBUA considered in this assessment are Brinsworth and Whiston.

<sup>7</sup> <https://www.rotherham.gov.uk/downloads/file/652/detailed-green-belt-review-2016>

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NPPF grey belt Test	Considerations
	<p>W2W has 2 distinct parcels within it, all of which are located in proximity to the M1/M18 junction 32 (Thurcroft Interchange) which is a major motorway junction/corridor in South Yorkshire near Thurcroft. W2W is also the closest part of the Site to the National Grid Long Lane 400kV substation which the Proposed Development will connect into.</p> <p>W2W does not adjoin any of the LBUA listed above, with the major motorway corridor physically separating the LBUA of Brinsworth, and Whiston from any parcels of W2W.</p> <p>W2W and the areas surrounding the Site are heavily influenced by the urbanised Thurcroft Interchange, which is a major motorway junction running north to south (M1/M18) and to the west towards Sheffield (M1). The eastern boundary of W2W abuts the M1 and it is considered that an extension to this development into the Green Belt would not result in an incongruous pattern of development out into the countryside.</p> <p>Considering W2W is either already separated by physical features and urbanising influences such as permanent road corridors (which would contain any future development) or is located a significant distance away from existing large built-up areas, it is not considered that W2W contributes strongly to this purpose of the Green Belt.</p>
143 (b) to prevent neighbouring towns merging into one another	<p>As set out above, the only towns that are in proximity to W2W are Brinsworth and Whiston.</p> <p>As set out above, the M1/M18 junction 32 (Thurcroft Interchange) physically separates all of the towns listed above from each other, so whilst it is noted that W2W sits in a central gap between the towns, there are already significant physical features which provide permanent visual and physical separation to avoid the towns merging.</p> <p>W2W does not play an important role in this separation, and only forms a small part of the gap, with many other Green Belt parcels fulfilling this purpose of the Green Belt without W2W. This has been agreed by RMBC in the most recent Strategic Green Belt 8review which confirms that these parcels of land make a 'slight /negligible' contribution to this purpose of the Green Belt.</p>

<sup>8</sup> <https://www.rotherham.gov.uk/downloads/file/652/detailed-green-belt-review-2016>

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NPPF grey belt Test	Considerations
143 (d) to preserve the setting and special character of historic towns	<p>As set out above, the only towns that are in proximity to W2W are Brinsworth and Whiston.</p> <p>The W2W parcels are all separated from Brinsworth and Whiston by the M1 motorway, and Long Lane 400kV substation, so it is not considered that the parcels contribute in any way to this purpose of the Green Belt in relation to either of those towns.</p> <p>As such, there is no visual, physical, or experiential connection to the historic aspects of the town and it is therefore considered that W2W does not contribute strongly to this purpose of the Green Belt.</p>
<b>Whitestone 3</b>	
Footnote 7	<p>W3 does not contain any habitats sites, including any SACs, SPAs or Ramsar sites or SSSIs.</p> <p>W3 does not contain any area of Local Green Space or Ancient Woodland and is not designated as a National Landscape or Heritage Coast.</p> <p>W3 does not contain any designated heritage assets or Conservation Areas.</p> <p>There are small areas of Flood Zone 2 and 3 within W3 – however the Flood Risk Assessment confirms that there would be no overall increased risk of flooding, and the Proposed 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. As such, this alone would not provide a strong reason for refusing or restricting development. It is also recognised that the latest NPPF consultation proposes to remove Footnote 7 from the grey belt definition, as it was considered that this approach applied unnecessary layers of protection to these assets and also meant that grey belt could only be provisionally identified before considering the impact of specific development proposals, which is an important consideration.</p> <p>It is not considered that any of the exceptions outlined in footnote 7 apply to W3 and therefore would not restrict the area being classified as grey belt.</p>
143 (a) to check the unrestricted sprawl of large built-up areas	As set out above, the PPG states that villages should not be considered ‘large built-up areas’ in this context, only towns and cities (Paragraph: 005 Reference ID: 64-005-20250225). W3 is located away from any large built-up areas or towns, the closest settlements are Harthill and Woodall, which are small villages,

## APPENDIX 2 - GREEN BELT ASSESSMENT

NPPF grey belt Test	Considerations
	<p>rather than towns, and Kiveton Park to the north which is a large village.</p> <p>As such, in accordance with the PPG, it is not considered that W3 contributes strongly to this purpose of the Green Belt because there are no large built-up areas in close proximity.</p>
<p>143 (b) to prevent neighbouring towns merging into one another</p>	<p>As per the PPG (Paragraph: 005 Reference ID: 64-005-20250225) this purpose related to merging towns, not villages. There are no settlements that are categorised as ‘towns’ in proximity to W3, and the settlements mentioned above are villages, or smaller hamlets but they are not towns and have therefore not been assessed below.</p> <p>It is therefore not considered that W3 contributes strongly to this purpose of the Green Belt. This has been agreed by RMBC in the most recent Strategic Green Belt<sup>9</sup> review which confirms that these parcels of land make a ‘slight /negligible’ contribution to this purpose of the Green Belt.</p>
<p>143 (d) to preserve the setting and special character of historic towns</p>	<p>As per the PPG (Paragraph: 005 Reference ID: 64-005-20250225) this purpose related to merging towns, not villages. There are no settlements that are categorised as ‘towns’ in proximity to W3, and the settlements mentioned above are villages, or smaller hamlets but they are not towns and have therefore not been assessed below.</p> <p>It is therefore not considered that W3 contributes strongly to this purpose of the Green Belt. This has been agreed by RMBC in the most recent Strategic Green Belt review which confirms that these parcels of land make a ‘slight /negligible’ contribution to this purpose of the Green Belt.</p>

3.2.9 From the assessment above, it is considered that all 4 areas (so the total Order Limits), can be considered grey belt by definition, as per the NPPF Glossary. This is however only the first step in assessing if development can be considered ‘not inappropriate’ on grey belt land. Next, it is important to consider paragraph 155 of the NPPF.

### 3.3 Grey belt Assessment – Inappropriate Development Consideration

3.3.1 Once it has been confirmed that the land that is the subject of assessment is grey belt as per the definition in the NPPF, the next step is to confirm whether the

<sup>9</sup> <https://www.rotherham.gov.uk/downloads/file/652/detailed-green-belt-review-2016>

development can be regarded as 'not inappropriate' as per paragraph 155 of the NPPF which states:

*“The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply:*

- a. 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;*
- b. There is a demonstrable unmet need for the type of development proposed;*
- c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and*
- d. Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157 below.” (our emphasis)*

3.3.2 In this regard, policy envisages that it is possible that land can be defined as grey belt, but that development within it could still be regarded as inappropriate, therefore requiring the demonstration of very special circumstances. This second test requires a consideration of the impact of the development itself and therefore more permanent development with a greater visual impact, for example large scale housing or employment development, might still be regarded as inappropriate, whereas development such as solar, which provides visual breaks and has less impact on openness, may be regarded as not inappropriate. This further consideration in relation to the Proposed Development is provided below.

3.3.3 The Proposed Development (W1, W2 and W3) is considered in relation to each of these tests below.

### **Test 1 - 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**

3.3.4 As discussed above, the Site comprises grey belt. The following paragraphs consider how the Order Limits, should it be developed for Whitestone Solar Farm, would affect the performance of the wider Green Belt beyond the Site boundary against the five purposes. Each purpose is considered in turn, then conclusions are drawn regarding the purposes considered together

#### **Purpose A - to check the unrestricted sprawl of large built-up areas**

3.3.5 The majority of the Order Limits are not located adjacent to large built-up areas, with the exception of W1 which abuts the A630 which is adjacent to the town of Conisbrough to the north, the eastern most parcel of W2 which abuts South Anston to the north of the A57 and is also in proximity to North Anston to the east. Where the land is close to the LBUAs, there are robust physical boundaries such as the A630, the M18 and mature woodland containing W1, and the railway line and A57 containing W2.

3.3.6 In all cases, the Proposed Development is well contained from the wider Green Belt due to the robust boundaries noted above and there are other large parcels of existing Green Belt which will play an important role in checking the unrestricted sprawl of these large built-up areas. The wider Green Belt in these areas and across the land in proximity to the Order Limits as a whole would continue to make the same contribution towards this purpose as it currently does.

#### **Purpose B - to prevent neighbouring towns merging into one another**

3.3.7 The only town in close proximity to W1 is Conisbrough, and so there would be no impact on the surrounding Green Belt in terms of retaining separation between Conisbrough and other towns in proximity, with extensive areas of Green Belt still surrounding W1 which would be unaffected.

3.3.8 It is acknowledged that W2 sits in a central gap between a number of towns, however there are no towns which are so close that the visual and physical separation would be lost by introducing the Proposed Development, and the remaining Green Belt would play an important role in retaining this separation, particularly between Laughton Common and Wickersley.

W3 sits in close proximity to Wales and Kiveton Park, and Killamarsh, however these are considered villages and are not relevant to purpose b, which only considers towns.

### Purpose C – to assist in safeguarding the countryside from encroachment

3.3.9 South and West Yorkshire contains approximately 245,870 ha of Green Belt land (correct as of March 2025<sup>10</sup>). The Site comprises just 1,488 ha of Green Belt land amounting to 0.606% of the South and West Yorkshire Green Belt land.

3.3.10 In terms of Local Authority Green Belt designations:

- Doncaster contains approximately 23,020 ha of Green Belt accounting for approximately 40% of the total Doncaster area;
- Rotherham contains approximately 20,050 ha of Green Belt accounting for approximately 70% of the total Rotherham area;
- North East Derbyshire contains approximately 10,320 ha of Green Belt accounting for approximately 37.5% of the total North East Derbyshire area.

3.3.11 The Proposed Development would clearly be in only a very small proportion of the Green Belt in each Local Authority area and is largely contained from the wider Green Belt due to robust boundaries (such as the M1, M18 and other major road networks, railway lines, mature woodland and existing development). Overall, the development of the Site would not have a significant effect on the wider Green Belt's ability to safeguard the countryside from encroachment, and it would remain predominantly as open countryside.

### Purpose D - to preserve the setting and special character of historic towns

3.3.12 As set out in the assessment above, the Site does not make a significant contribution to the special character of Conisbrough or Dinnington (or any other nearby towns), as it only adjoins very small areas of the built-up areas, which are the external, later additions to the towns and not the historic centres. Furthermore, it is largely physically and visually separated from both towns by major road networks, railway lines and large agricultural fields which are also located within the Green Belt. These areas would continue to contribute towards the setting and special character of both towns as they currently do and would continue to be connected to the wider Green Belt.

### Purpose E – to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

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<sup>10</sup> [Local authority green belt: England 2024-25 - statistical release - GOV.UK](https://www.gov.uk/government/statistics/local-authority-green-belt-england-2024-25-statistical-release)

- 3.3.13 As identified above, paragraph 5.3.11 of NPS EN-1 acknowledges that it might not be possible to propose large scale solar development on previously developed land, which is the case for Whitestone. However, the development of Whitestone Solar Farm would not prejudice or prevent the development of brownfield or other urban land for other developments which can still be prioritised.
- 3.3.14 In addition, the operational lifetime of the Proposed Development is 60 years, after which time the solar panels, substations, BESS and associated infrastructure will be removed, and the land returned to its previous use as far as practicable. As such, by locating the temporary Proposed Development on greenfield, undeveloped Green Belt, this allows derelict or other urban land to be used for permanent uses (such as residential or commercial development) which would fulfil this purpose of the Green Belt.
- 3.3.15 As noted above, planning policy also encourages the most effective use of land, and brownfield land in particular which would encourage higher density development on brownfield and urban land, in closer proximity to services and public transport connections. To this end, ground-mounted solar does not make the most efficient use of derelict and urban land.

### **Test 2 - There is a demonstrable unmet need for the type of development proposed**

- 3.3.16 The UK cannot meet its energy security needs, or its net zero obligations without rapidly expanding low-carbon energy generation. This is further clarified by the UK Government policy within NPS EN-1 paragraph 4.2.2. Wind and solar offer the lowest cost electricity available today, cutting bills while delivering clean, secure power that is not dependent on volatile fuel markets. Government analysis confirms that by 2050, a reliable, affordable, net zero energy system will rely primarily on wind and solar as noted at NPS EN 1 paragraph 3.3.20.
- 3.3.17 The Whitestone Solar Farm will play an important role in assisting the UK Government to meet its net zero targets by 2050.
- 3.3.18 As such it is considered that there is a demonstrable unmet need for this type of development. Further information on this is demonstrated within the **Statement of Need [EN0110020/APP/5.8]** and **Planning Statement [EN0110020/APP/5.4]**.

### **Test 3 - The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework**

- 3.3.19 Paragraphs 110 and 115 of the NPPF set out that development should seek to mitigate significant impacts on the transport network in terms of capacity, congestion and highway safety, whilst focusing development to sustainable locations by limiting the need to travel and offering a genuine choice of transport modes.
- 3.3.20 It should be noted that this policy test is more relevant to development which provides homes and/or jobs where it is desirable to be in as a sustainable location as possible, with access to a range of transport modes other than the private car. In overall terms, developing low intensity uses such as ground-mounted solar away from urban areas and thus enabling the more beneficial use of highly sustainable sites for the development of residential and employment uses helps support this aim in itself. However, the suitability of the Order Limits from a transport and highway safety perspective is briefly considered below.
- 3.3.21 The location of the Proposed Development was chosen through first identifying a suitable grid connection for a utility scale project. This was identified at Brinsworth Substation through discussions with National Grid. The connection agreement has

since been amended to the new Long Lane 400kV substation which is located within the vicinity of the existing Brinsworth substation, less than 1km to the east. Following this, locations for elements of the Proposed Development were identified based on constraints such as but not limited to topography, environmental designations, and Green Belt.

- 3.3.22 The Proposed Development is located in close proximity to the Strategic Road Network (SRN), which utilises the M1 and M18 which is a major motorway junction/corridor in South Yorkshire near Thurcroft. Junction 36 of the A1(M) will be utilised to provide SRN routing onto the local highway network for construction within W1. Junction 1 of the M18 motorway will be utilised to provide SRN routing onto the local highway network for construction within part of W2. Junction 31 of the M1 motorway will be utilised to provide SRN routing onto the local highway network for construction of W2 and W3. Junction 33 will also provide routing to conduct construction within W2.
- 3.3.23 The construction, operation and decommissioning phases of the development would utilise the existing road network and due to the nature of the Proposed Development, there would not be any need to create new roads in the local area.
- 3.3.24 As set out within the **ES Volume 2, Chapter 13: Traffic and Transport [EN0110020/APP/6.13]**, the Proposed Development is deemed to have limited transport impact during the operational phase, with the site being considered sustainable in terms of location for access and transport.

**Test 4 - Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157 below.**

- 3.3.25 The 'Golden Rules' as set out within paras 156-157 are not relevant to the Proposed Development as they specifically relate to housing development only. No assessment of these 'Golden Rules' has therefore been made.

## 3.4 Conclusion

- 3.4.1 In summary, the Proposed Development is located on grey belt land because the Site does not strongly contribute to Green Belt purposes (a), (b) or (d) as outlined in Table 2.2. Further, the application of policies in footnote 7, including flood risk, do not provide a strong reason for refusing development for the reasons set out above.
- 3.4.2 Applying the additional tests in NPPF paragraph 155, 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 and appropriate location with respect to transport. For the reasons set out above, the proposed development accords with Paragraph 155 (a), (b), (c), and (d) of the NPPF and should therefore not be considered as inappropriate development in the Green Belt.

## 4 VERY SPECIAL CIRCUMSTANCES

### 4.1 Introduction

- 4.1.1 As set out above, the Applicant is satisfied that the Proposed Development is located on grey belt land and, furthermore, is not inappropriate development in the Green Belt. This section of this Appendix is therefore provided in the event that this position is not agreed by the Examining Authority and/or Secretary of State and provides a full consideration of the elements of the Proposed Development that would be regarded as inappropriate and not inappropriate and an assessment of very special circumstances, without prejudice to the Applicant's central position.
- 4.1.2 The Proposed Development is critical national priority (CNP) development as defined in paragraph 4.2.17 of NPS EN-1, and 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"*.
- 4.1.3 Given the above, the starting point should be that the Proposed Development meets the VSC tests in the NPPF, the full consideration of which is set out in detail below.
- 4.1.4 Paragraph 5.11.37 of NPS EN-1 states that VSC is 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 153 of the NPPF confirms that 'very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 4.1.5 As set out in paragraph 153 of the NPPF, when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. The Applicant considers that footnote 55 is engaged as the land is grey belt, however an assessment on the potential harm to the purposes of the Green Belt and its openness has been set out below should the SoS disagree.
- 4.1.6 In this context, the Applicant's position is that the entirety of the Proposed Development is 'not inappropriate' for the reasons given in Section 3 of this Green Belt Assessment. However, if this position is not agreed, an analysis of the 'inappropriate' and 'not inappropriate' components is provided below, together with a full assessment of 'harm'.

### 4.2 What are the 'inappropriate' components of the Proposed Development and which are not inappropriate

- 4.2.1 NPPF paragraph 154 confirms that development in the Green Belt is inappropriate, however, there are some exceptions to this, and if one of these exceptions applies, the automatic presumption of harm does not apply. In the case of the Proposed Development, the following components should, in the

opinion of the Applicant, be regarded as not inappropriate, provided they preserve its openness and do not conflict with the purposes of including land within it:

- Proposed permissive paths;
- Proposed vegetation and landscaping;
- Areas retained and enhanced for biodiversity;
- Unsurfaced maintenance tracks; and
- Engineering operations required in connection with the construction of the solar farm, including the laying of cables which will be underground.

4.2.2 It is considered that the above components preserve the openness of the Green Belt and do not conflict with the purposes of including land within it due to the nature of them, predominately being natural landscape features with no above ground impact on openness. The engineering operations will be temporary in terms of its visual and spatial impact in the Green Belt, and following construction the cables will be buried below ground and will therefore not impact upon openness or affect the purposes of the Green Belt.

4.2.3 Notwithstanding the Applicant's central position that the Order Limits should be defined as grey belt and that the entirety of the Proposed Development is not inappropriate in the Green Belt, the following components of the Proposed Development comprise inappropriate development in the Green Belt, for the purposes of assessing the potential harm to the Green Belt:

- Installation of substations proposed by the Applicant and associated infrastructure;
- Installation of Battery Energy Storage Systems;
- Installation of solar panels and associated infrastructure;
- Fencing, cameras, lighting infrastructure;
- Construction compounds and associated vehicular accesses; and
- Other new vehicular access points and highways works.

### 4.3 Potential Harm to the Five Purposes

4.3.1 The paragraphs below set out the potential harm to the five purposes of the Green Belt as a result of the Proposed Development.

#### **Purpose A - to check the unrestricted sprawl of large built-up areas**

4.3.2 Purpose a seeks to check the unrestricted sprawl of large built-up areas, with the PPG stating that villages should not be considered 'large built-up areas' in this context, only towns and cities.

4.3.3 As defined above, the following towns are considered as 'large built-up areas' in proximity to the Proposed Development and have been considered when assessing harm to Purpose a:

- Conisbrough;
- Brinsworth (included in the Rotheram Urban Area);
- Whiston (included in the Rotheram Urban Area);
- Bramley, Wickersley and Ravenfield Common (grouped); and

- Dinnington, Anston and Laughton Common (grouped).

- 4.3.4 The majority of the land parcels which make up the Order Limits are not located at the edge of large built-up areas, and they are located in between settlements, in locations that are predominantly agricultural fields currently. However, W1 does abut the A630 which is adjacent to the town of Conisbrough to the north. The current **Works Plans [EN0110020/APP/2.3]** shows a setback of 300m from the southern edge of Conisbrough, which will introduce an area of distinct separation, which is proposed for species-rich grassland seed mix, reducing visual impact from the southern edge of the settlement and in views experienced when travelling along Sheffield Road.
- 4.3.5 The eastern most parcel of W2 also abuts South Anston to the north of the A57 and is also in proximity to North Anston to the east, however in both instances the design has ensured that there are adequate setbacks from the large built-up areas, either setbacks to the Order Limits or areas of biodiversity enhancement, to ensure that the harm to purpose a is limited.
- 4.3.6 However, the key point to make in relation to the Proposed Development is that the type of development proposed is not permanent 'built-up' development in the way new residential or commercial development would be. The nature and design of the Proposed Development ensures that the height of the development is low lying and broken up by grassy spaces between rows of panels, planting in field margins and more substantial landscaping as set out in the **outline Landscape and Ecology Management Plan (oLEMP) [EN0110020/APP/5.13]** and the associated infrastructure in terms of new road infrastructure, amenities, lighting and hard surfacing is minimal, compared to more permanent development.
- 4.3.7 The Proposed Development is also of a temporary nature with an operational lifetime of up to 60 years, after which time it will be decommissioned and removed from the land. It is not permanent and is not considered to cause a notable urbanising influence which would affect contribution to the Green Belt purposes in perpetuity, As such it is temporary and reversible and is providing protection to the Green Belt for the 60 year period, ensuring that other harmful, inappropriate development that might result in urban sprawl cannot be proposed.
- 4.3.8 Therefore, due to its low impact and temporary nature, the Proposed Development has limited harm to Green Belt purpose a.

### **Purpose B - to prevent neighbouring towns merging into one another**

- 4.3.9 As per the PPG (Paragraph: 005 Reference ID: 64-005-20250225) this purpose relates to merging towns, not villages, as such the following towns have been considered:
- Conisbrough;
  - Brinsworth (included in the Rotheram Urban Area);
  - Whiston (included in the Rotheram Urban Area);
  - Bramley, Wickersley and Ravenfield Common (grouped); and
  - Dinnington, Anston and Laughton Common (grouped).
- 4.3.10 Due to the nature of the Proposed Development set on agricultural fields, it is located on land in-between towns and smaller settlements. The land parcels (W1, W2 and W3) all lie in proximity to the towns listed above, but are all intersected by major road networks (predominately the M1 and M18) as set out in detail in Table

2.2. As such, in most cases there are already existing, permanent features that prevent towns from merging in the Green Belt.

- 4.3.11 It is acknowledged that W2 sits within a central gap between the following LBUAs; Dinnington, Anston and Laughton Common. In order to ensure that harm to this purpose has been limited, the Applicant has ensured that the Order Limits are not located abutting town edges and these have been pulled away to prevent potential harm, for example, the parcels of W2 adjacent to the town of Anston and Dinnington abut the North Anston Trading Estate slightly to the west, however the main large built-up area is separated from W2 by the railway line which runs north to south along the eastern boundary of W2, and additional fields of Green Belt land, with a setback of approximately 250m. The greatest pressure for potential harm in relation to Green Belt purpose b is between the towns of Whiston and Brinsworth, both forming part of the Rotherham built-up area in proximity to W2, however, for this reason there are no parcels of W2 proposed within the gap between the two towns. The Applicant has also introduced setbacks within the Order Limits where necessary.
- 4.3.12 Further to the assessment of the locational harm of the proposed development, similar points are raised in relation to purpose b, as were made for purpose a in that the Proposed Development is not 'built-up' in the traditional sense where new residential or commercial development within the gaps between existing towns would cause harm to the Green Belt and enable the towns to merge through new, permanent development which would make it difficult for the distinct edges of the existing towns to be identified. The Proposed Development is very different to the existing built-up areas, and even if there was a perception of harm in terms of the merging of towns, the low lying, temporary and fragmented nature of the development would retain the edges and identity of the existing towns, limiting the harm significantly.
- 4.3.13 In addition, the Proposed Development is also of a temporary nature with an operational lifetime of up to 60 years, after which time it will be decommissioned and removed from the land. As such it is temporary and reversible and is providing protection to the Green Belt for the 60-year period, ensuring that harmful, inappropriate development that would result in the merging of towns cannot be proposed.
- 4.3.14 Therefore, due to its location, and low impact and temporary nature, the Proposed Development has limited harm to Green Belt purpose b.

### **Purpose C - to assist in safeguarding the countryside from encroachment**

- 4.3.15 The Order Limits are wholly located within the Green Belt, and the Proposed Development would encroach into the countryside by virtue of the parcels of land being located on predominantly agricultural land located in the countryside.
- 4.3.16 As set out above, the parcels of land that comprise the Order Limits are all within close proximity (in many cases abutting) of the M1 or M18 motorway corridors, or in proximity to smaller villages or larger built-up towns, which are already urbanised landscapes with major road networks running through them.
- 4.3.17 It is acknowledged in NPS EN-1 paragraph 5.3.11 that *“although the re-use of previously developed land for new development can make a major contribution to sustainable development by reducing the amount of countryside and undeveloped greenfield land that needs to be used, it may not be possible for many forms of*

*energy infrastructure*". Large scale solar developments fall into this category, and it is not possible to connect into the chosen substation at National Grid's Long Lane 400kV Substation where there is sufficient existing capacity, without developing on the Green Belt land surrounding it.

- 4.3.18 It is therefore considered that some conflict with this purpose is inevitable for the type, location and scale of development being proposed, however due to the characteristics of the land within the Order Limits and the significant urbanised features running through the Proposed Development it is considered that this would constitute moderate harm to the Green Belt purpose.

### **Purpose D - to preserve the setting and special character of historic town**

- 4.3.19 As set out in the PPG, this purpose relates to historic towns, not villages (Paragraph: 005 Reference ID: 64-005-20250225). As set out above, the following towns have been considered in this assessment of harm:

- Conisbrough;
- Brinsworth (included in the Rotheram Urban Area);
- Whiston (included in the Rotheram Urban Area);
- Bramley, Wickersley and Ravenfield Common (grouped); and
- Dinnington, Anston and Laughton Common (grouped).

- 4.3.20 The design of W1 includes setbacks from part of the Order Limits abutting the A630 in proximity to the urban built-up areas, ensuring there is no harm to the setting and special character of Conisbrough. In addition, the settings assessment (**ES Volume 3, Appendix 8.4: Assessment of Indirect Effects to Setting [EN0110020/APP/6.20]**) has identified the potential for a Moderate Adverse effect upon Conisbrough Castle, however all of these Moderate Adverse effects would be considered Not Significant, and as such it is considered there would also be limited harm to the setting of the historic elements of the town.

- 4.3.21 The design of W2 includes significant setbacks, or physical separation from Brinsworth, Whiston, and Dinnington, Anston and Laughton Common. Anston is the closest settlement to W2, adjoining the parcels in a very small area to the east of W2, which is split into North and South Anston. North and South Anston are of medieval origin and feature two Conservation Areas and a number of listed heritage assets, however the modern village encircles this historic core of both settlements, which is later 20th Century development.

- 4.3.22 W2 would be located, at its closest, 300m north-west of the South Anston Conservation Area, and 40m south-west of the North Anston Conservation Area and there is no visibility of the Proposed Development from either Conservation Area or historic centre. The part of W2 located closest to North Anston Conservation Area is proposed for landscape and biodiversity mitigation and enhancement measures. The main LBUA is also separated from W2 by the railway line which runs north to south along the eastern boundary of W2, and additional fields of Green Belt land.

- 4.3.23 In addition, the settings assessment (**ES Volume 3, Appendix 8.4: Assessment of Indirect Effects to Setting [EN0110020/APP/6.20]**) has confirmed that effects on all heritage assets would be considered Not Significant. As such it is considered that the Proposed Development has limited harm to purpose d.

### **Purpose E - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.**

- 4.3.24 This purpose of the Green Belt is to direct development to brownfield land. As part of the site selection process the Applicant considered whether sufficient previously developed land would be available to develop a utility scale solar development, however an assessment of brownfield land within the wider Search Area identified no land of an adequate land area to facilitate a large-scale solar project either individually or in combination with other sites. This is set out in more detail in **Appendix 1: Site Selection Assessment of Planning Statement [EN0110020/APP/5.4]**.
- 4.3.25 As identified above, NPS EN-1 paragraph 5.3.11 acknowledges that it might not be possible to propose large scale solar development on previously developed land, which is the case for Whitestone. However, the development of Whitestone Solar Farm would not prejudice or prevent the development of brownfield or other urban land for other developments which can still be prioritised. In addition, the operational lifetime of the Proposed Development is 60 years, after which time the solar panels, substations, BESS and associated infrastructure will be removed, and the land returned to its previous use as far as practicable. As such, by locating the temporary Proposed Development on greenfield, undeveloped Green Belt, this allows derelict or other urban land to be used for permanent uses (such as residential or commercial development) which make more effective use of scarce brownfield land, and would thus fulfil this purpose of the Green Belt.
- 4.3.26 As such whilst it is considered that the Proposed Development does conflict with this purpose, the conflict is justified by the circumstances set out above.

## **4.4 Potential Harm to the Openness of the Green Belt**

- 4.4.1 There is no defined national or policy method to assess 'openness' beyond the guidance within the PPG. The PPG (Paragraph: 013 Reference ID: 64-013-20250225) notes that judgement is required to determine the impact of a proposal on the openness of the Green Belt. It also identifies a number of factors which can be taken into account when considering the potential impact to openness. These include, but are not limited to:
- openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;
  - the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness;
  - the degree of activity likely to be generated, such as traffic generation.
- 4.4.2 Spatial/physical openness considers the spatial impact of the development, such as the mass, height and floor area. Visual openness is also a factor which is taken into consideration, including the visibility of the development (i.e. the Green Belt will visually appear less or more open [undeveloped] as a result of the development). Visual openness can also be affected by development blocking a view towards the open land within the Green Belt.
- 4.4.3 As set out above, the Site has been split into three areas, Whitestone 1, Whitestone 2 and Whitestone 3.
- 4.4.4 Whitestone 1 is largely comprised of larger irregular, arable fields bound by hedgerows and tree belts. Some scattered properties are inset from the Order

Limits, with hard surfaced tracks and lanes serving them and extending through the area, however most nearby residential properties are concentrated in Clifton, approximately 470m to the east, and Conisbrough immediately north of the A630 which borders the Site. Whitestone 1 is largely free of existing development and therefore can be described as spatially and visually open.

- 4.4.5 Whitestone 2 has been split further into five parcels, which are also largely comprised of arable fields bound by hedgerows and tree belts W2 is bisected by the M1 and M18 which run north to south through the centre of W2. There are also six wind turbines associated with Penny Hill Wind Farm in W2 to the west of the M1. W2 has a broad open landscape, with undulations in topography forming bowls and small shallow valleys where there are extensive views, however trees and hedgerows generally contain views from roads and footpaths. W2 is largely free of existing development and therefore can be described as spatially and visually open.
- 4.4.6 Whitestone 3 has been split further into three parcels, which are also largely comprised of arable fields bound by hedgerows and tree belts, bisected in the south by the M1. It is a broad open landscape with expansive views from elevated areas; the topography consists of small hills such as Stone Hill in the west of the Site. In the lower parts there are belts of trees which contain views from these areas. Residential receptors are generally concentrated in the villages of Woodall, Harthill, Kiveton Park, Wales and South Moor. W3 is largely free of existing development and therefore can be described as spatially and visually open.
- 4.4.7 As described above, the Site is largely undeveloped, spatially open and free from built development. The Proposed Development would inevitably result in a substantial increase in physical infrastructure within the Green Belt on the Site, within locations where Solar PV Panels and larger infrastructure, such as substations and BESS, are proposed. Approximately 46% of the Order Limits comprises Solar PV Panels and other large infrastructure. Approximately 54% of the Order Limits will remain as mostly open land uses such as biodiversity enhancements, grassland creation, underground cables and access creation. As such, under half of the Site could no longer be described as spatially open. Where areas have been retained and enhanced for biodiversity, or proposed for grassland, the spatial openness of the Green Belt within these locations will remain the same. The spatial openness of the cable corridors will also remain, due to the cables being underground, granting there will be temporary engineering operations during the construction phase.
- 4.4.8 Although solar PV panels will decrease the spatial openness of the Green Belt in the specific location in which they are sited, their design, comprising relatively thin panels mounted on steel frames laid out in rows, means they would present a modest volume. They would occupy a significantly smaller volume and height than buildings and would be visually permeable. Overall, there would be a high level of harm to the spatial openness of the Green Belt within the Order Limits.
- 4.4.9 The visual openness of the Site would also be reduced where solar PV panels and larger infrastructure are sited. However, as set out above, the visual openness of much of the Green Belt within the Site would remain. Furthermore, the layout of the solar PV panels means that there would be a degree of visual permeability. Due to the height of the solar PV panels, and the existing character of the Site being comprised of arable fields contained by hedgerows, hedgerow trees and tree belts, the effects on visual openness of the Green Belt within the Site would be mostly limited to the immediate field parcel, with longer views across the Site not currently possible.

- 4.4.10 Where larger infrastructure is proposed, for example the substations and BESS, there would be a localised further reduction in the visual and spatial openness of the Green Belt within the immediate vicinity due to the larger volume of elements and associated infrastructure such as fencing, access tracks, lighting and CCTV. Over time, proposed mitigation planting will further contain the larger infrastructure, reducing its impact of the visual openness of the Green Belt in the immediate vicinity. Overall, there would be a high level of harm to the visual openness of the Green Belt within the Order Limits.
- 4.4.11 As set out within **ES Volume 3, Appendix 7.4 [EN0110020/APP/6.20]**, the Proposed Development would be visible from a number of locations within the Green Belt within the immediate surroundings of the Order Limits. However, due to intervening landform, vegetation and built form, longer views from within the Green Belt towards the Proposed Development would be very limited. Over time, the availability of these views would reduce due to proposed mitigation planting. Although in some instances proposed mitigation planting would truncate once open views across the Green Belt, this would be in keeping with the surrounding character of fields bound by hedgerows, hedgerow trees and tree belts.
- 4.4.12 Overall, there would be a moderate to limited level of harm to the visual openness of the Green Belt within the immediate surroundings of the Order Limits, and a limited to no level of harm to the visual openness of the wider Green Belt, during the lifetime of the Proposed Development.
- 4.4.13 As set out within the PPG, alongside spatial and visual aspects, other important factors to consider when judging harm to openness is the duration of the development, its remediability, and the degree of activity likely to be generated.
- 4.4.14 With regards to the duration of the development, the Proposed Development is temporary in nature with a lifespan of 60 years, after which time it would be decommissioned and returned to arable use, in agreement with the landowner. As such, the development, although long-term in nature, is temporary and can, and will, be removed, with the land being returned to its original state and to its previous state of openness.
- 4.4.15 With regards to degree of activity generated, the Proposed Development will be a solar farm which is characterised by very low levels of activity during both operation and maintenance. This would be of a similar level to current agricultural activity and would not result in an increased impact on the openness of the Green Belt. It is recognised that there would be heightened levels of activity and traffic generation during the construction phase, however, this would be temporary and short-term.
- 4.4.16 Due to the localised effects on spatial and visual openness, the temporary nature of the development, the remediability of the land back to its previous state, and the lack of material change in activity and traffic generation as a result of the Proposed Development, the overall level of harm to the openness of the Green Belt is judged to be limited.

## 4.5 Any other harm

- 4.5.1 Inappropriate development in the Green Belt, is harmful by definition, however policy in the NPPF requires consideration both in terms of harm to openness and any other harm. Harm in relation to the five purposes of including land within the Green Belt is set out above. In relation to any other harm, the Applicant has prepared an **Environmental Statement [EN0110020/APP/6.1-6.21]** which

demonstrates the application of the mitigation hierarchy so that the residual effects are limited to those which cannot be further mitigated. The Applicant has also taken a careful and responsible approach to design, as set out in the **Design Approach Document [EN0110020/APP/5.7]** which shows how the Proposed Development has been designed to take account of its context and has applied a landscape-led approach.

4.5.2 As set out in **ES Volume 2, Chapter 18 Summary of Significant Effects [EN0110020/APP/6.18]** there are limited significant residual effects remaining following mitigation with the majority of topics reporting no significant adverse effects, with the exception of the following:

- Low Magnitude, Adverse Effects on Biodiversity and Nature Conservation during construction and decommissioning due to habitat loss or disturbance within the Order Limits, but balanced by significant beneficial effects during operation (see below);
- Moderate to Major Adverse Effects on LVIA during construction and decommissioning due to a temporary change in landscape character within the Order Limits and Moderate to Major Adverse Effects during operation due to changes to views due to components of the Proposed Development; and
- Moderate Adverse Effects on BMV Land due to the construction of the Proposed Development on BMV land changing availability of this land for arable use.
- There are also beneficial effects to Biodiversity and Greenhouse Gas Emissions at operation stage.

4.5.3 The above conclusions of the ES demonstrate that, whilst it is inevitable that there will be some residual adverse effects when developing a large scale solar farm in the countryside, the effects have been significantly minimised and the overall harm to the Green Belt is therefore limited due to the Applicant's responsible approach to mitigation across the Order Limits, as set out in the outline Management Plans

### Overall conclusions on harm

4.5.4 As explained above, the Applicant's central position is both that the land within the Order Limits is grey belt, as defined by the NPPF, and that the Proposed Development does not form inappropriate development within the Green Belt. However, if this position is not accepted, whilst there is inherent harm to the Green Belt as a result of the Proposed Developments inappropriateness, there would be limited impact to openness of the Green Belt. Other harm is also minimised, as the identified significant effects reported in the EIA are not considered to amount to significant harm. In relation to the five purposes of including land in the Green Belt, the Proposed Development would cause moderate harm in relation to purpose c – safeguarding the countryside from encroachment and limited harm in relation to all other purposes.

## 4.6 Very Special Circumstances

4.6.1 In summary, the following applies to the Proposed Development amounting to a robust VSC case:

- VSC1 – meeting the urgent need for secure, clean, renewable energy contributing to achieving the UK's targets;

- VSC2 – Biodiversity Net Gain and biodiversity enhancements;
- VSC3 – economic/educational benefits; and
- VSC4 – community benefit fund.

### **VSC1 – meeting the urgent need for secure, clean, renewable energy contributing to achieving the UK’s targets**

- 4.6.2 The NPSs establish a critical national priority for the provision of nationally significant low carbon infrastructure, which includes large-scale solar farms, because a combination of many or all types of such infrastructure is urgently required for both energy security and net zero.
- 4.6.3 NPS EN-1 states at paragraph 4.1.7 that *“For projects which qualify as CNP Infrastructure, it is likely that the need case will outweigh the residual effects in all but the most exceptional cases”*. The Proposed Development is CNP Infrastructure. Therefore, it follows that the urgent need for the Proposed Development to achieving the UK’s energy objectives, together with the national security, economic, commercial, and net zero benefits will outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy as set out in paragraph 3.3.63 of NPS EN-1.
- 4.6.4 The government’s Clean Power 2030 Action Plan reinforces the urgent need for low carbon generation schemes to come forwards to achieve its Clean Power target and pave the way to decarbonising the wider economy by 2050 as the UK pursues the electrification of heat in buildings, transport, and industry.
- 4.6.5 The Proposed Development could contribute approximately 3% of the new capacity required to meet the government’s Clean Power Capacity Range for solar power by 2030. This demonstrates that the Proposed Development will, if consented, bring forward large-scale ground-mounted solar with co-located energy storage facilities and will make a critical contribution towards net zero. The Proposed Development is therefore required to ensure that the UK remains on track to support government’s clean power ambitions on the way to meeting its legally binding carbon emissions reduction targets, including the Sixth Carbon Budget and beyond.
- 4.6.6 This is further set out within the **Statement of Need [EN0110020/APP/5.8]**.

### **VSC2 – BNG/biodiversity enhancements**

- 4.6.7 The Proposed Development presents the opportunity for the enhancement of vegetation across the Order Limits, benefitting ecological connectivity, diversity and biosecurity whilst contributing to the quality of the landscape. The Proposed Development will include the following new planting:
- Species-rich grassland and wildflower meadow:
  - Species-rich grassland under solar modules:
  - Hedgerow margin/species-rich grassland:
  - Riparian zones/species-rich grassland:
  - Native woodland and tree belts:
  - Proposed native hedgerows: and
  - Proposed native hedgerows with trees.
- 4.6.8 A BNG assessment including enhancement proposals are presented **ES Volume 3, Appendix 6.4: Biodiversity Net Gain Report [EN0110020/APP/6.20]**, which

includes a commitment to at least 10% BNG, over at least a 30-year period, and acknowledge that this will be secured in the DCO.

- 4.6.9 The strengthening of existing habitat features and habitat connectivity through enhancements and management, along with new habitat creation prescriptions are detailed in the **outline Landscape and Ecology Management Plan [EN0110020/APP/5.13]**

### VSC3 – economic/educational benefits

- 4.6.10 The Proposed Development will create both economic and educational benefits as set out further within the **ES Volume 2, Chapter 15: Socio-Economics and Land Use [EN0110020/APP/6.15]** and the **Outline Skills, Supply Chain and Employment Management Plan [EN0110020/APP/5.18]**.

- 4.6.11 In summary, some of the benefits resulting from the Proposed Development include the following:

- Local employment through the creation of new jobs within the planned construction phase which is expected to span approximately 24 to 36 months.
- Local businesses will see benefits through the use of materials and infrastructure to assist with the construction elements of the Proposed Development.
- Increase in local GVA as a result of the increase to local job markets and workforce being from the local surrounding area.

- 4.6.12 The outline Employment, Skills and Supply Chain Plan also aims to achieve the following where possible:

- Increase direct and indirect employment and opportunities;
- Encourage the next generation to take up careers in renewable energy sector through partnerships with local colleges; and
- Engage effectively with local businesses and wider supply chain.

### VSC4 – community benefit fund

- 4.6.13 While not considered within the planning balance case, the Applicant is proposing a Community Benefit Fund, the details of which are still to be confirmed, but which will be announced in due course, following discussions with the host local authorities, stakeholders and members of the community. This fund is envisaged by the Applicant to be delivered in partnership with the local community. Members of the local communities would be able to advise on the fund strategy and spend, to prioritise issues that are important to the local area.

- 4.6.14 The total amount of Community Fund would be based on the final installed capacity of the Proposed Development. Based on the information presented at statutory consultation, the Applicant would look to offer a community benefit fund of £400 per MW per year. The final figure would be based on the final size of the Proposed Development, the lifetime of the project, and the outcomes of further engagement.

## 4.7 Conclusion

- 4.7.1 The Proposed Development is located on grey belt land and meets the tests for being not inappropriate within the Green Belt. Should the Secretary of State disagree with the position on grey belt, the Proposed Development is CNP

## APPENDIX 2 - GREEN BELT ASSESSMENT

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Infrastructure, and as such, the starting point for decision making is that the test of very special circumstances in Green Belt policy is satisfied. 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, which is considered to be limited for the reasons set out in this assessment.



**WHITESTONE**  
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