

South Brooks Solar Farm

Section 51 Advice Log Version: 27 February 2026

There is a statutory duty under ['section 51 \(s51\) of the Planning Act 2008'](#) for The Planning Inspectorate to record the advice that it gives in relation to an application or potential application, and to make this publicly available.

This document comprises a record of the advice that has been provided by The Planning Inspectorate to the applicant (Blue Planet Solar Limited) and their consultants during the pre-application stage. It will be updated by The Planning Inspectorate after every interaction with the applicant during which s51 has been provided. The applicant will always be given the opportunity to comment on The Planning Inspectorate's draft record of advice before it is published.

The applicant will use this advice log as the basis for demonstrating regard to s51 advice within the application.

Project name s51 Advice Log - Index	
Date of meeting	Meeting overview
09 October 2025	See Inception meeting note <ul style="list-style-type: none"> • The Proposed development • Consenting programme • Early engagement with statutory bodies, local authorities, and stakeholders • Environmental constraints and issues • EIA scoping • Environmental surveys • Design • The draft Development Consent Order (DCO) • Land rights • Consultation
27 February 2026	<ul style="list-style-type: none"> • Non-Technical Summary • Stakeholder engagement Update • Next project update • Habitats Regulations Assessment • Consultation • Land and rights tracker

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Programme Document

[Post-meeting advice] The Inspectorate welcomes receipt of the latest version of the applicant’s Programme Document (February 2026 version), which continues to include the expected content as set out in government guidance. The Programme Document in particular includes a good summary of the main issues as well as useful additional information, such as other consents and licences that may be required. However, the Inspectorate makes the following comments -

- **Grid connection**

The Programme Document indicates that the grid connection for the project has been secured. It may be helpful if the document could contain the anticipated date for connection, where feasible, as well as any related conditions or dependencies (such as reinforcements works at substations or phased connection requirements).

- **Potential Main Issues for Examination (PMIE)**

The Programme Document states an intention to issue the Potential Main Issues for Examination (PMIE) for comments in Q1 2027 ahead of the proposed submission of the application. The applicant should be aware that if agreement on key matters cannot be reached with relevant stakeholders before submission, this may affect the extent of Examining Authority questions needed at examination, as well as the possibility of change requests (which can cause risks to the consenting process). The applicant is advised to consider whether any subsidiary issues and the potential activities needed to resolve them should be captured in the ‘minimising programme risks’ section.

- **Cumulative impact with nearby solar DCOs**

The Programme Document notes that the South Brooks Solar Farm is located in proximity to two other solar NSIP projects expected to be submitted within a similar timeframe. The Inspectorate observes that cumulative impact assessment is likely to be an important consideration in this context.

The applicant should be aware that coordination with neighbouring project promoters can assist in ensuring that cumulative effects are comprehensively and

	<p>consistently assessed. Early dialogue may help identify shared assumptions, data requirements, or overlapping assessment topics.</p> <p>The presence of multiple large-scale solar proposals within the same geographic area may also create challenges for local communities in understanding the relationships between the projects. The applicant may wish to consider whether coordinated or complementary approaches to public engagement could help reduce confusion and support effective consultation.</p>
<p>Issues Tracker</p>	<p>[Post-meeting advice] The Inspectorate welcomed receipt of the applicant's Issues Tracker and the level of detailed information provided at this stage.</p> <p>The tracker contains descriptions of ongoing survey work and proposed assessment approaches on environmental matters but lacks detail on the areas of concern and/or disagreement. It is also unclear to what extent assessment methodologies, study areas, and data requirements have been agreed with relevant statutory consultees. Whilst there is a RAG status, based on the discussion provided in the tracker, there is no clear differentiation between the statuses as to why one is more likely to be resolved than another.</p> <p>The applicant should indicate the level of agreement/disagreement on specific matters, setting out the positions of the consultees and applicant.</p> <p>HRA</p> <p>The Tracker identifies that HRA work is ongoing and that screening findings have been submitted to Natural England. The applicant should be aware that areas of residual risk remain until the scope of the Appropriate Assessment, mitigation measures, and any need for derogation are confirmed. The applicant is encouraged to provide an anticipated timeline for reaching agreement on the HRA and identify any areas which could lead to issues in examination and why.</p> <p>Flood Risk and Water Environment</p> <p>Given the site's extensive coverage by Flood Zones 2 and 3, the applicant should prioritise securing agreement with the EA on the flood modelling methodology, including climate change allowances, breach parameters, and any</p>

	<p>agreed departure from standard guidance. The ES must demonstrate application of the mitigation hierarchy in locating the proposed development infrastructure.</p> <p>Best and Most Versatile (BMV) Land</p> <p>Where the use of BMV land cannot be avoided, the extent of BMV land affected should be set out and clear justification for use of these areas should be given in the site selection and application of the mitigation hierarchy.</p> <p>Landscape and Visual Impact Assessment (LVIA)</p> <p>The applicant should seek agreement with relevant parties on the approach to the LVIA assessment methodology and selection of viewpoints.</p>
Land and Rights Tracker	<p>The Land and Rights Tracker provides a useful high-level overview of parties with an interest in land and the status of engagement. The Inspectorate notes that, at present, the tracker shows the same status (“beginning or continuing engagement”) for all Parties with an Interest in Land (PILs). The applicant should ensure that, as negotiations progress, the tracker is updated to differentiate between initial contact, ongoing negotiation, and any areas where agreement in principle has or has not been reached.</p> <p>For many PILs, the tracker currently does not record the plots affected or the specific powers sought. As draft Land Plans and the Book of Reference evolve, the applicant should ensure this information is consistently incorporated, as this will support transparency and assist with understanding the scope of powers sought across the Order limits.</p> <p>The applicant should be aware that the tracker must be kept up to date and shared with the Inspectorate at regular intervals during pre-application and submitted in editable format alongside the Statement of Reasons at acceptance.</p>
Consultation	<p>The Applicant advised the Inspectorate that the Preliminary Environmental Information Report (PEIR) and other consultation materials would be clear and accessible to allow consultees to provide feedback on the proposals. The Applicant is taking a bespoke approach to the PEIR which will present information in the style of a Non-</p>

	<p>Technical Summary rather than a 'draft-ES' format which will enable consultees to understand the extent of the proposed development, the site context, the potential effects and constraints that may need to be mitigated, as well as the evolution of the design.</p> <p>The applicant is advised to provide a clear and accessible NonTechnical Summary in the Preliminary Environmental Information Report (PEIR) and other consultation material, as part of statutory consultation, to help illustrate for consultees the extent of the proposed development, the site context, the potential effects and constraints that may need to be mitigated, as well as the evolution of the design. This will support communities in understanding the project, how it differs from any other developments in the local area and in providing sufficient information to allow for informed responses under the Gunning Principles.</p> <p>The applicant and Inspectorate noted the changes to consultation requirements under the Planning and Infrastructure Act 2025, which are awaiting the enactment of the commencement regulations and the issuing of associate government guidance.</p>
Stakeholder engagement	<p>The Inspectorate advised that it would be helpful for the applicant to include an updated summary of stakeholder engagement, outlining key issues raised and how feedback has influenced the design of the proposals.</p>
Habitats Regulations Assessment (HRA)	<p>The Inspectorate queried whether the refinements of the proposed development and updated surveys had implications for the HRA. The applicant confirmed that there were potential impacts to functionally linked land and the cable route would cross a Site of Special Scientific Interest (SSSI) and compensation was likely to be required. It is currently in discussion with Natural England as to whether it could be concluded there would be no Adverse Effects on Integrity or whether derogations would be required.</p>
Updates to the proposed development	<p>The applicant explained there had been a number of areas where solar panels had been removed and buffers had been put in place in response to feedback. This is to mitigate visual impacts and setting impacts for receptors such as residential homes and Public Rights of Way (PRoW) and impacts to the operations of Lydd airport.</p> <p>A sequential approach to siting two substations has been undertaken to minimise potential flood risk effects taking</p>

	into account the flood defences in place in the area. The Battery Energy Storage System is proposed to be sited using the same criteria.
Topic	Meeting date: DD Month YYYY
Topic	Advice given