

Planning Addendum for Solar Development and Associated Works.

Nuneham Solar Farm.

On behalf of RES Ltd.

Date: March 2026 | Pegasus Ref: P21-2947 R009v5_PL

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1. Introduction

1.1. This Planning Addendum has been prepared to address the comments raised by the Local Planning Authority and those raised by statutory consultees following the consultation for Application Reference P24/S1136/FUL.

1.2. This proposal is for solar development (PV) farm on land north-west of Nuneham Courteney, South Oxfordshire. This development would have the capacity of up to 49.9MW of renewable energy. In summary, the proposal would provide 49.9MW of clean and renewable (low carbon) energy, enough to power over 13,000 homes annually and saving an estimated 800,000 tonnes of CO₂ over the lifetime of the project compared to electricity from fossil fuels like gas. The description of development is:

“Construction and operation of a solar farm with all associated works, equipment, necessary infrastructure and biodiversity net gains – known as Nuneham Solar Farm”.

1.3. This report addresses the following matters:

- Design Changes – Section 2
- National Policy Update – Section 3
- Grey Belt – Section 4
- Ecology – Section 5
- Drainage – Section 6
- Heritage – Section 7
- Planning Balance – Section 8.

1.4. This submission includes ES Addendum works. The full scope of this addendum submission can be found in the enclosed covering letter.

1.5. This Document is written as a planning addendum to the documentation currently being considered. This document should be read alongside, and in addition to, the following documents:

- Planning Statement (Ref R001v2 dated April 2024)
- Design and Access Statement (Ref R002v2 dated April 2024)
- Planning Addendums submitted in August 2024 and January 2025

1.6. The following plans are now considered to be superseded:

Superseded Plan	Amended Plan
Planning Infrastructure Layout – Figure 4 O4531-RES-LAY-DR-PT-003 Rev 5.1	Planning Infrastructure Layout – Figure 4 O4531-RES-LAY-DR-PT-003 Rev 6
Planning Infrastructure Layout – Figure 5	Planning Infrastructure Layout – Figure 5



O4531-RES-LAY-DR-PT-004 Rev 6	O4531-RES-LAY-DR-PT-004 Rev 7
Landscape Masterplan P21-2947_EN_100 Rev G	Landscape Masterplan P21-2947_EN_100-S1 Rev L
Drainage Strategy Drawing (Sheets 1-3) P21-2947-PEG-XX-XX-DR-C-0100-P4	Drainage Strategy Drawing (Sheets 1-3) P21-2947-PEG-XX-XX-DR-C-0100-P7
Typical PV Module and Rack Details – Figure 8 O4531-RES-SOL-DR-PT-001 Rev 2 Sheet 1 of 2 O4531-RES-SOL-DR-PT-001 Rev 2 Sheet 2 of 2	Typical PV Module and Rack Details – Figure 8 O4531-RES-SOL-DR-PT-001 Rev 3 Sheet 1 of 2 O4531-RES-SOL-DR-PT-001 Rev 3 Sheet 2 of 2

2. Design Changes

- 2.1. The amendments to the application submitted in January 2025 and referred to in the previously submitted addendum were consulted upon by the Council in January 2025.
- 2.2. Following correspondence with officers during the most recent consultation period of the revised submission, the Applicant was asked to consider whether there was a possibility that the substation could be relocated within the red line boundary so that it was located outside of the area of archaeological potential. Following a review of options, a meeting was held with Officers from South Oxfordshire Council and Oxfordshire County Council to discuss the scheme on 19th August 2025.
- 2.3. In this meeting the revised location for the sub-station was proposed, discussed and agreed. As such, the following changes have been made to the layout:
 - **Relocation of Substation Building** – the substation has been relocated within the site to an area of lesser archaeological potential. This has been accepted by the County Archaeologist and Conservation Officer informally prior to submission. The area in which the substation was previously sited will be covered by panels and a no dig approach to construction maintained. Works associated with the substation are provided on the submitted plans, the substation itself has not increased in area of the site covered.
 - **Reduction in panel height** – the panel height as currently submitted included for a maximum height of the panels to 3.6m (as shown on Figure 8 – 04531-RES-SOL-DR-PT-001 Rev 2 Sheets 1 & 2). As part of the revised scheme the panels have reduced in height to a maximum of 3m across the site. Drawing Number Figure 8 – 04531-RES-SOL-DR-PT-001 Rev 3 Sheets 1 & 2 provides these revised details.
- 2.4. As a result of the revisions to the layout, the following works have been undertaken:
 - **Update to Landscape Masterplan** – additional landscaping has been included to the revised substation area and to the boundaries of the site to provide screening to the development to address comments received from the Landscape Officer following our meeting. As a result, the planting now comprises over 300 new trees, over 4km of new hedgerow and now a new area of 5km squares of native shrub planting. The details of the planting scheme are shown on Drawing Number P21-2947_EN_100-S1 Rev L.
 - **Revised net gains calculation** – the biodiversity net gains have been recalculated as a result of the additional proposed planting proposed on site. This is discussed in greater detail in Section 5 of this report.
 - **Revised drainage design** – as a result of the scheme revisions, a revised drainage strategy has been provided for the site. This is discussed in full detail in the Section 6 of this report.
- 2.5. An Environmental Statement Addendum, dated January 2026, has been produced for those relevant topics (landscape and visual effects, archaeology & cultural heritage, ecology and agricultural land) as part of this submission.

3. National Policy Update

- 3.1. Owing to the passing of time since the last addendum, there have been a number of national policy updates, prudent to the decision-making process.

Solar Roadmap

- 3.2. The Solar Roadmap was published in June 2025 following the publication of the current NPPF and the Clean Power 2030 Action Plan (December 2024).

Need for Renewable Energy

- 3.3. It is acknowledged widely within this document that ‘solar is at the heart of the mission to make the UK clean energy superpower’ and that whilst this document sits alongside the Clean Power Action Plan, this roadmap ‘set the stage for longer-term growth beyond 2030, and commits to actions to support new, good quality jobs, through the ramp up of solar deployment’.
- 3.4. The production of the Solar Roadmap further reiterates the Government’s commitment to net zero and increasing the amount of energy produced by renewable sources. This document takes this one step further in outlining the current Grid reforms and the steps to be taken to increase provision of skilled workers within the industry. The document further outlines the desire for a move towards a greater reliance on renewable energy generation over fossil fuels, emphasised at Page 57, when referencing the updated National Policy Statements that, *“Alongside other low carbon technologies, solar infrastructure is considered to be of a Critical National Priority for the provision of nationally significant low carbon infrastructure. This recognises the urgent need for these projects to achieve out energy objective, and provide wider national security, economic, commercial, and net zero benefits.”*

Grid Connection

- 3.5. When considering the importance of Grid connections, it is acknowledged within this document at Page 32 that, “large scale projects have faced some of the longest delays and costs as a result of the connections queue. It is important that viable projects are able to connect quickly, in order that they can come online by 2030 and deliver clean power in line with the Government’s ambition”. Securing a grid connection is fundamental for unlocking vital investment and delivering greater energy security for England.
- 3.6. A grid connection offer for Nuneham Solar Farm was secured in October 2021 following discussions with the Distribution Network Operator (DNO) Scottish and Southern Energy Networks (SSEN). Following the submission of a connections reform Gate 2 application in Summer 2025, RES have received notification that it has been allocated to Gate 2 Phase 1 of the reformed GB connections queue. This is a strong indication that its Gate 2 offer will reflect that currently set out in existing grid connection offer with SSEN. This envisages connecting to the grid through overhead lines and joining an existing pylon located to the northwest of the planning application site, at a voltage of 132kV. While the final details of the grid connection will be determined by SSEN as DNO at a later date and subject to a separate consenting process, the impacts of the current offer – including environmental, archaeological and landscape impacts of the connection and associated infrastructure – have been assessed, consulted upon, and addressed through the EIA Assessment and Environmental Statement and associated addenda which form a part of this application. The application and

current connection offer strategically aligns the project with the Clean Power 2030 Action Plan.

Best and Most Versatile Land & Food Security

- 3.7. On the matter of agricultural land, the Solar Roadmap re-states the position in respect of best and most versatile land on Page 20 with the preference being for low quality land and requiring justification for the use of better-quality land. Page 20 also notes that the planning system considers the impacts on food production. Annexed to the Roadmap is a document "Solar Misconceptions". Against the heading "Solar is a threat to food security", it is noted that "the biggest threat to food security is crop failure due to climate change and solar farm are helping to tackle this directly". This response also states:

"Recent UK Government analysis shows that even under the most ambitious deployment scenarios set out in the Solar Roadmap, and in the unlikely case that all new capacity coming forward is ground mount, it would only occupy up to around 0.6% of UK Utilised Agricultural Land by 2030 (less than that used by golf courses in Great Britain).

Solar farms are a temporary and completely reversible land use with restoration of land at the end of the solar farm's life usually guaranteed by a planning condition."

- 3.8. It is identified within recent planning appeals that this does not preclude development. In the Burcot Decision (Appeal Reference APP/Q3115/W/24/3350890) the Inspector concluded on the matter of agricultural land that:

"26. there is nothing in planning terms to prevent the use of fields for sheep grazing or even leaving them fallow. In fact, the Sustainable Farming Incentive encourages farmers to convert arable land to grassland.

32. Overall, the proposal would not result in either the temporary or permanent loss of BMV land for agriculture as the land would continue to be used for some agricultural purposes whilst also being used to produce solar energy. As the proposal would not be detrimental to the soil quality, a return to arable production at a later date would still be possible."

- 3.9. As such, whilst it is acknowledged within the submission that 96% of the site is not best and most versatile land, with 4% being Grade 2 and 3a, it is concluded that the Solar Roadmap supports the use of agricultural land where necessary acknowledging that 'solar sites typically cause minimal disturbance to the ground'.

Land Use/ Biodiversity

- 3.10. As discussed above, it is acknowledged within the Roadmap that solar typically causes minimal disturbance to the ground and that "the remainder of the land on which they are installed can be used for plant growth and wildlife enhancements during the lifetime of the solar site." The Roadmap further emphasises this outlining on Page 20 that:

- 3.11. "In some cases, these biodiversity benefits, including increases in the number of pollinators, can lead to increased productivity on adjacent agricultural land. A recent study from the Royal Society for the Protection of Birds and University of Cambridge found that, hectare for hectare, solar farms in East Anglia contained nearly three times as many birds compared to surrounding arable land."

- 3.12. Taking this a step further, Annex 2 ‘Solar Misconceptions’ of the Roadmap under ‘solar farms are bad for wildlife’ explains that well-designed and well managed solar farms can support a range of ecosystem services including agriculture (sheep grazing, supporting pollinator species), regulate air equality, mitigation flood risk, create habits and reduce carbon emissions. This is why organisations such the RSPB have expressed their support for solar farms.
- 3.13. In summary, the Solar Roadmap provides clear and unequivocal national support for well designed solar development, and the application as revised accords closely with its stated objectives. The revised layout, reduction in panel height, and strengthened landscape and ecological enhancements directly reflect the Roadmap’s emphasis on high quality design, minimising ground disturbance, and delivering meaningful biodiversity gains. The Roadmap also recognises that solar farms occupy only a very small proportion of national agricultural land and can continue to support agricultural activity and habitat improvement, which aligns with the scheme’s ability to achieve substantial biodiversity net gains. The updated proposals therefore respond positively to the Roadmap’s expectations for responsible site selection, environmental improvement, and climate led energy delivery, ensuring the development is consistent with the Government’s strategic approach to solar deployment as articulated within the Solar Roadmap.

Consultation Draft National Planning Policy Framework (December 2025)

- 3.14. The Government have released a revised National Planning Policy Framework on 16th December with a consultation running until March 2026. Whilst it is not yet formally adopted, it is considered that this is a clear direction of travel from the Government and attracts limited weight in the determination of this application.
- 3.15. This document sets out the key proposed changes of relevance to the proposed development.

Renewable and Clean Energy

- 3.16. The existing NPPF outlines at paragraph 161 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.”

This is echoed in the revisions of the consultation draft NPPF.

- 3.17. When determining policies for the renewable energy development the consultation draft of the NPPF Policy W3 ‘Renewable and low carbon energy development and electricity network infrastructure’ states:
1. In considering proposals for renewable and low-carbon energy development and electricity network infrastructure, substantial weight should be given to:
 - a) *The benefits of such development for improving energy security, supporting economic development and moving to a net zero future;*

- b) *In the case of applications for the re-powering and life-extension of existing sites, the additional benefit of utilising an established site for this purpose; and*
- c) *The contribution that small-scale and community-led renewable and low carbon energy projects can make to reducing emissions, along with their associated economic and social benefits.*

3.18. Whilst this echoes the outlined in the current NPPF, the increase in the weight applied to renewable energy proposals to 'substantial' shows a clear direction of travel by the Government towards a low carbon future.

3.19. The proposed revisions to the NPPF also reaffirms that there should be no requirement on applicants to demonstrate the need for renewable or low carbon energy development as per the current wording in Paragraph 168a).

Green Belt and Grey Belt

3.20. The five purposes of the Green Belt are outlined in the current NPPF under Paragraph 143, these remain unchanged in Policy GB2 of the consultation draft. Similarly, the requirement to demonstrate very special circumstances for inappropriate development. It is stated under Policy GB6 that *'substantial weight should be given to the harm to the Green Belt which would be caused, including harm to the openness.'*

3.21. Furthermore, the approach to renewable energy development remains unchanged and states that:

'In the case of proposed for renewable and low carbon energy development, very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.'

3.22. The principles of the Grey Belt detailed at Paragraph 155 of the current NPPF remain unchanged and are now listed at Policy GB7 (g) 'Development which is not inappropriate in the Green Belt'.

3.23. In terms of the definition of the Grey Belt and land to be included in it, the consultation draft NPPF 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 the purposes (a), (b), or (d) in policy GB2'.*

3.24. Whilst this is broadly similar to the current definition of the Grey Belt, there is a removal of the exclusion of land where the application of the policies relating to the area or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.

Heritage

3.25. When considering the impacts of a development on heritage assets there have been a number of changes in the consultation draft of the NPPF.

- 3.26. When considering the assessment of effects on heritage assets, Policy HE5 states at Part 2 that:
1. *Assessments of the potential effects of development proposals on heritage assets and their setting should identify whether proposals would be likely to:*
 - a. *Have a positive effect, which is where a heritage asset would be enhanced, or its significance better revealed; or*
 - b. *Have no effect on the significance of the asset; or*
 - c. *Result in harm to the significance of the heritage asset, either from work affecting the asset itself or from development within its setting. The degree of harm should be identified: substantial harm would occur where the development proposal would seriously affect a key element of the asset's significance; or*
 - d. *Cause the total loss of the significance of the heritage asset.*
 2. *In making this assessment it is the effect on an asset's significance rather than the scale of the development which should be considered.*
 3. *Decision makers should be satisfied that this assessment accurately reflects the effects on heritage assets caused by the proposals.*
- 3.27. When considering the potential impact on heritage assets, the consultation draft seeks to remove reference made to 'less than substantial harm' as currently written under Paragraph 215. Instead under Policy HE6, Part 1 harm is defined as either '*positive effect, harm, substantial, or total loss of significance*'.
- 3.28. In line with the current wording of the NPPF, reliance the balancing of harm against demonstrable public benefits is carried through into the wording of the consultation draft. Part 3 of Policy HE6 outlines that:
3. *Where a development proposal would harm the significance of a designated heritage asset the effect on the asset and its significance should be weighed against any public benefits resulting from the proposal. Important public benefits can include securing the long-term re-use of a vacant or underused listed building, and enabling energy efficiency and low carbon heating measures to be employed.*
- 3.29. While the consultation draft of the National Planning Policy Framework (December 2025) does not yet form adopted national policy and therefore attracts only limited weight in decision-making, its provisions are nevertheless highly relevant in indicating the Government's clear direction of travel. The revised application presented in this Addendum aligns closely with that emerging policy framework.
- 3.30. In particular, the consultation draft places **substantial weight** on the benefits of renewable and low-carbon energy development, reinforces the removal of the requirement for applicants to demonstrate the need for such development, and strengthens policy support for clean energy infrastructure within the planning system (Policies W3, GB6 and HE5–HE6).
- 3.31. The reductions in panel height, relocation of the substation to minimise archaeological effects, enhanced landscape planting, and recalculated biodiversity net gains directly

respond to the draft Framework's emphasis on good design, minimising environmental harm, and securing measurable environmental enhancements.

- 3.32. The draft also continues to support renewable energy development in the Green Belt where the wider environmental and energy-security benefits outweigh any residual harm.
- 3.33. Accordingly, although the consultation draft NPPF cannot itself be treated as a material consideration, the scheme as revised is demonstrably consistent with its emerging principles, further reinforcing the strong policy support already afforded to the proposal under the currently adopted NPPF and associated national guidance.

Conclusions

- 3.34. As discussed above, it is considered that the consultation draft NPPF attracts limited weight in the determination of the appeal. However, it is considered that the scheme, as presented, gains further support from the provisions made in the consultation draft NPPF which are even more supportive of renewable energy and Green Belt development.

National Planning Policy Statements – EN1 and EN3

- 3.35. EN-1 (Overarching National Policy Statement for Energy) and EN-3 (Renewable Energy Infrastructure) were superseded with revised versions that came into force on 6 January 2026. These superseded the previous 2024 versions of the documents. Whilst these documents are not determinative in this application, they continue to acknowledge energy infrastructure as critical national priority and make reference heavily to Clean Power 2030 Action Plan. This again re-emphasises the Government's approach to renewable energy infrastructure.

4. Grey Belt

- 4.1. As discussed in the previous addendum submissions, it is considered that the site could constitute Grey Belt land by definition. This conclusion followed the introduction of the Grey Belt policy in the NPPF in December 2024. Since that time the approach to Green Belt and Grey Belt has been further clarified through a number of appeal decisions and the publication of the revised NPPG on Green Belt in February 2025.
- 4.2. In order to provide further confirmation of the Applicant's position on Grey Belt for this application a supplementary Green Belt Assessment has been prepared and is submitted with the current revised proposals.
- 4.3. The Grey Belt Assessment (report reference R008v4), assesses the site against the definition of the Grey Belt as found at Annex 2 (Glossary of the NPPF) and Paragraph 155 of the NPPF and in light of the guidance in the NPPG.
- 4.4. For the avoidance of doubt, Paragraph 155 outlines that, the development of homes, commercial and other development in the Green Belt should also be regarded as inappropriate where all of 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 the Framework; and*
 - d) *Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraph 156–157*
- 4.5. For the reasons set out in our assessment it is concluded that the site meets the definition of the Grey belt as stated in the NPPF and the requirements of Paragraph 155. As such, the proposed development is not considered to form inappropriate development, and very special circumstances are not required to be demonstrated.
- 4.6. Notwithstanding this, should Officers be minded to conclude that the site does not comprise Grey Belt, very special circumstances can be demonstrated sufficient to justify the development within the Green Belt. This planning balance is set out in greater detail at Section 8 of this report.

5. Ecology

- 5.1. As discussed above, following the inclusion of additional planting to address landscape Officers concerns, the biodiversity net gains being achieved on the site have been re-calculated.
- 5.2. At the time of the original application submission, the total number of biodiversity units in the proposed layout post development are 85 units of area habitat, 24.83 units of hedgerow and 1.90 watercourse units. This equates to a 70.94% net gain in area habitats, a 61.48% net gain in hedgerow habitats and a 24.32% net gain in watercourse habitats.
- 5.3. The revised calculations as included within the BNG Report (ref dated January 2026) and within the revised metric are 89.91 units of area habitat, 29.39 units of hedgerow and 1.90 watercourse units. This equates to a 73% net gain in area habitats, a 72.79% net gain in hedgerow habitats and a 24.32% net gain in watercourse habitats. This is significantly more than the required net gains of 10%.
- 5.4. There are no proposed amendments to the proposed skylark mitigation that is agreed to be covered under a future S106 Agreement.
- 5.5. As such, it is considered that the scheme continues to comply with the requirements of Policy ENV3 of the Local Plan.

6. Drainage

- 6.1. This addendum is supported by a Flood Risk and Drainage Technical Note (Ref R003v3-IN-P21-2947) that reassesses the scheme against the revised layout, provides updated surface water drainage details and reviews the current Environment Agency (EA) mapping against the amended layout owing to the update in the national flood risk datasets.
- 6.2. The updated surface water drainage proposals are shown on Drawings P21-2947-PEG-XX-XX-DR-C-0100-P7 (Sheet 1-3). The drainage strategy maintains the principles of the original drainage strategy to which South Oxfordshire and Vale of White Horse District Council drainage team and Oxfordshire County Council as the Lead Local Flood Authority had no objections.
- 6.3. The strategy includes attenuation for the substation using cellular storage tank before being discharged to the watercourse to the west as previously proposed. Swales proposed along the western boundary will be maintained as per previous consultee comments.
- 6.4. This document concludes that following a review of the revised mapping, the substation compound is not considered to be at risk of flooding.
- 6.5. It is therefore concluded that the scheme continues to be compliant with the relevant requirements of Policy EP4 of the Local Plan.

7. Heritage

- 7.1. As discussed within the earlier sections, the changes to the layout have been made to address concerns raised primarily by Oxfordshire County Council Archaeology Officer. The assessment of the amended scheme is provided within the Heritage ES addendum. Following the relocation of the substation outside of the area of archaeological sensitivity, the harms identified within the original ES to the archaeological deposits will no longer occur and therefore the moderate to high level of harm is no longer valid.
- 7.2. It is also confirmed that the amended scheme would not give rise to any additional harms as assessed from the original ES. The amended scheme would result in the removal of an identified harm to the non-designated archaeological deposits in the northern portion of the scheme and a reduction in harm to a designated asset: the scheduled Romano-British pottery site. The conclusion can be drawn therefore that the Amended Scheme represents a betterment in terms of heritage harm. As with the original ES assessment, no significant effects are identified arising from the amended scheme.
- 7.3. As acknowledged within the planning statement that the Local Plan policies against which the application is assessed in relation to heritage are Policies ENV6, ENV7 Part 1 and ENV9 Part 1. It is concluded that proposed development constitutes less than substantial harm and is in compliance with the relevant policies of the Local Plan. This remains the case in regard to the revised proposals.
- 7.4. The benefits associated within the scheme including, but not limited to renewable energy generation and a scheme of heritage interpretation boards, provide substantial public benefits to outweigh the less than substantial harm afforded.

8. Planning Balance

- 8.1. Notwithstanding the location of the site within the Green Belt, for the reasons set out in the Grey Belt Assessment (report R008v4), the land is considered to comprise Grey Belt land and the proposal is not inappropriate development. Consequently, in accordance with the NPPF, NPPG and decisions of the courts, there is not a need to consider the proposal to be harmful to the Green Belt.
- 8.2. Should officers determine that this is not the case, very special circumstances need to be demonstrated whereby the benefits of the proposal outweigh the harms to the Green Belt and other harms.
- 8.3. Whilst it is accepted that the proposal will result in changes to the local environment, such as in terms of visual impacts, those changes are not such that would constitute a breach of the policies contained within the Development Plan. This is also the case where any identified harm can be addressed by way of a planning condition, such as matters of landscaping, ecological mitigation and enhancement. This application, as summarised by the planning statement has demonstrated accordance with policy and is consequently in accordance with guidance contained within the NPPF and NPPG.
- 8.4. Notwithstanding this accordance with planning policy, the change of the local environment is considered to equate to landscape harm to which moderate weight is attributed, in line with the conclusions reached in the original LVIA (Chapter 6 of the ES).
- 8.5. Similarly, whilst the level of harm to heritage assets is assessed as being less than substantial and outweighed by the public benefits, resulting in accordance with national and local policy, it is acknowledged that it is necessary to have regard to NPPF paragraph 212 and the great weight should be given to the assets' conservation (the more important the asset, the greater the weight should be). It is also relevant to have regard to caselaw and in particular **Palmer vs Herefordshire Council & Anor [2016] EWCA Civ 1061**, where it is noted that:
- “The duty to accord “considerable weight” to the desirability of avoiding harm does not mean that any harm, however slight, must outweigh any benefit, however great, or that all harms must be treated as having equal weight.”
- 8.6. Accordingly, nothing the heritage balance outlined at Section 7 whereby the harm to heritage is clearly outweighed by the public benefits, the weight to be applied to the heritage harm in the planning balance is assessed as being moderate.
- 8.7. In accordance with the NPPF, if the proposal is considered to be inappropriate development in the Green Belt, it is necessary to give substantial weight to the harms to the Green Belt including the definitional harm and noting that the harm to openness and to the purposes of the Green Belt are both limited.
- 8.8. The benefits of the scheme can be listed as, but not limited to:
- Enabling the move to a reliance on low carbon and renewable energy in achieving net zero where there is a clear need and supported by local policy, the NPPF and Nationals Policy Statements.

- The scheme will also assist in ensuring a secure supply of renewable energy, in line with national policy objectives.
- A deliverable scheme with a viable and available grid connection with energisation before 2030.
- Biodiversity Net Gains – 73% net gain in area habitats, a 72.79% net gain in hedgerow habitats and a 24.32% net gain in watercourse habitats. This is significantly more than the required net gains of 10%.
- Maintaining existing footpath routes within the site with the inclusion of interpretation boards as identified on drawing number P21-2947_EN_100-S1 Rev L.

8.9. In conclusion, having examined the benefits outlined above, and also the overall low localised harm to the openness of the Green Belt (which should be afforded substantial weight), and to any other harms as assessed above in respect of landscape and built heritage, it is demonstrated in the table below that ‘very special circumstances’ are shown. The benefits of the proposal clearly outweigh the harms identified to the Green Belt and other harms as identified above to landscape and heritage matters.

Material Considerations which are Benefits	Weight (Positive)
Renewable energy generation and reduction in carbon emissions	Substantial Positive Weight
Climate Emergency	Substantial Positive Weight
Energy Security	Substantial Positive Weight
Grid Connection	Significant Positive Weight
Economic Benefits	Significant Positive Weight
Biodiversity Net Gain	Significant Positive Weight
Green Infrastructure and Environmental Benefits	Significant Positive Weight
Farm Diversification (including soils)	Moderate Positive Weight
Scheme of Interpretation Boards	Moderate Positive Weight
Material Considerations which are Neutral	Weight (Neutral)
Impact on Agricultural Land	Neutral Weight
Flood Risk and Drainage	Neutral Weight
Noise Impact	Neutral Weight
Glint and Glare	Neutral Weight
Transport	Neutral Weight
Material Considerations which are Adverse	Weight (Adverse)
Effect on openness and purpose of the Green Belt (if not considered Grey Belt)	Substantial Adverse Weight
Effect on Landscape	Moderate Adverse Weight
Impact on Designated Heritage Assets	Moderate Adverse Weight

8.10. In consideration of compliance with the Development Plan and other planning policy requirements, the very special circumstances associated with the Proposed Development it is clear that this development is, on balance, acceptable in planning terms.



- 8.11. The Proposed Development has been shown to achieve the main objective of sustainable development (environment, social and economic) without causing undue detriment to any of those matters. The presumption in favour of sustainable development set out in the NPPF there applied here. As the NPPF directs, in such circumstances and where the application complies with the Development Plan, the application should be approved without delay.

9. Summary and Conclusions

- 9.1. As discussed within the Planning Statement and within this addendum report, the proposed development supports the UK Government's intention to move a low carbon economy, which represents a substantial benefit. The impacts of the proposal have been shown to be acceptable and, where necessary mitigation measures have been set out to reduce potential impacts of the proposed development.
- 9.2. The significant benefits associated with this proposal, primarily through the generation of renewable energy to provide low carbon electricity, offsetting carbon emissions and a valuable contribution towards meeting the challenging obligations of the Government regarding renewable energy generation and also in the form of economic investment and ecological and landscape enhancements, are factors which weigh heavily in favour of this development.
- 9.3. This Planning Addendum identifies the additional works that have been undertaken. The amendments made to the scheme directly respond to the comments made on the application and demonstrate a willingness from the applicant to work with the LPA and stakeholders to achieve a highly beneficial scheme. The manner in which the scheme has been designed represents a sustainable form of development which complies with national and local planning policy and addresses all material planning considerations.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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