



PLANNING STATEMENT ADDENDUM

**1 Introduction**

1.1 Planning application reference 24/00384/FUL, for the “*installation and operation of a solar farm and battery energy storage system (output up to 40MW)*” on land adjacent to the A614, Worksop, Nottinghamshire, was submitted to Bassetlaw District Council in April 2024. In September 2024 the proposed layout was revised to address concerns raised about the impact of the development on Clumber Park and on West Drayton Avenue, a defunct entrance route to Clumber Park (but not itself part of the designated heritage asset), by setting the solar arrays further back from the southern boundary of the application site to ensure the agricultural character remains legible, and providing additional planting to the west and south which will deliver long-term benefits to the historic environment by reinstating the lost agricultural field pattern and the route of the defunct avenue leading from Normanton Gate. The revised layout was informed by advice from the applicant’s Heritage Consultant (CuraTerrae). At the same time, the applicant’s Heritage Consultant provided commentary on the revised layout, including details of the extent to which this was informed by historic mapping and the merits of the proposals in this context, which was also submitted , along with an addendum to the originally submitted LVIA which shows that the proposed development will not be visible from within Clumber Park.

1.2 Since then:

- all relevant consultees have been reconsulted on the application and it is recognised that there continue to be some concerns about there being less than substantial harm to identified heritage assets, as set out in the heritage addendum which accompanies this planning statement addendum. It has though been confirmed that, other than less than substantial harm to heritage assets, there are no other outstanding matters to be addressed;
- the National Planning Policy Framework (NPPF) (the terms of which are addressed in the planning statement submitted with the application) was revised in December 2024, with a number of changes introduced which aim to increase the likelihood of local planning authorities granting permission to renewable energy related schemes; and
- a number of appeal decisions clarifying how the planning balance should be applied in cases where developments such as that proposed in this case are



considered to result in less than substantial harm to heritage assets have been issued, with it now necessary for those to be taken into account as material considerations when determining this application.

- 1.3 Of the points above, the first is addressed in the heritage addendum, which responds to the relevant consultee responses and sets out why, in the view of the applicant's Heritage Consultant, the proposed development is considered not to result in any harm to the setting of the Grade I Registered Clumber Park and the Grade II\* Listed Drayton Gate and Normanton Gate. On the basis of the heritage addendum's conclusion that there would be no negative impacts on heritage assets, it is considered that the application complies with all relevant policy requirements as set out in the originally submitted planning statement, and the application should be approved accordingly, with no need to consider the second two points above any further.
- 1.4 However, even if the proposed development is considered to cause a degree of less than substantial harm, this does not automatically mean the application should be refused. Rather, any such harm needs to be balanced against the benefits that the development would deliver (details of which are provided in section 2 of the planning statement), taking into account the revised terms of the NPPF and recent appeal decisions in doing so. This addendum to the planning statement thus considers the implications of the revised terms of the NPPF and recent appeal decisions in this context, and addresses the planning balance that should be applied, setting out why the application should be approved, even if less than substantial harm to any heritage assets would be caused (which, for the avoidance of doubt, the applicant maintains that there would not be in this case, for the reasons given in the heritage addendum, which this addendum to the planning statement should be read alongside).
- 1.5 It should also be noted that, shortly after the application was submitted, the Core Strategy & Development Management Policies Development Plan Document of the Bassetlaw District Council – Local Development Framework (adopted December 2011) (LDF) was replaced by the Bassetlaw Local Plan 2020 – 2038 (adopted May 2024) (BLP), with this now comprising the adopted Development Plan against which the application requires to be assessed. Relevant policy requirements from the BLP were addressed in the planning statement submitted with the application in anticipation of its adoption, and so the conclusions reached in that with regards to the proposed development's compliance with the Development Plan still stand, augmented by this addendum.



## 2 Revised National Planning Policy Framework (NPPF) (December 2024)

2.1 At the time proposed changes to the NPPF were initially published for consultation in July 2024, the Government made clear its commitment to delivering more sustainable growth, reaching zero carbon electricity generation by 2030, and increasing the likelihood of local planning authorities granting permission to renewable energy related schemes to achieve this. Reflecting this, the revised version of the NPPF includes the following key provisions supporting development such as that proposed in this case:

- [paragraph 161] – *“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.”*
- [paragraph 168(a)] - *“When determining planning applications for all forms of renewable and low carbon energy developments and their associated infrastructure, local planning authorities should: a) 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...”*

2.2 When determining this application, it is thus important to do so in a way that is conducive to supporting the transition to net zero, giving significant weight to the contribution that the proposed development would make to this. In terms of which, full details of the benefits of the proposed development are set out in section 2 of the planning statement, including the extent to which this aligns with targets to increase solar generation, in particular where this is co-located with other functions such as storage (as is the case in this instance), all of which needs to be given significant weight accordingly.

## 3 Recent appeal decisions

3.1 Fundamentally, it is important for there to be consistency in planning decision making and, while it is recognised that each application must be assessed on its own merits, applications of equal merit should be assessed equally. In terms of which, the following appeal decisions are relevant to the approach that should be taken to determining this application, and lend support to it being approved:



- **Appeal reference APP/T3725/W/24/3347315** for a 25MW solar farm and BESS facility on land near Holly Lane, Meer End, West Midlands (approved 30 January 2025) – in deciding to approve which, the inspector gave significant weight to the fact that renewable energy production has fallen behind levels required for the country to meet its target, with it in particular noted that solar energy production specifically was significantly below the targets set in national guidance. That the proposal would go some way to assisting in meeting those targets was then considered to be a significant benefit, to which due weight needed to be given in favour of the application being approved. The development proposed in this case would deliver an equivalent significant benefit (indeed, the greater scale of the proposal means that it would in fact deliver a greater one), to which due weight must likewise be given, taking into account that more solar energy production is needed to ensure that targets are met;
- **Appeal Ref: APP/W3520/W/24/3345132** for a 47.28MW solar farm on land at Woodlands Farm, Stowmarket, Suffolk (approved 7 January 2025) – the decision in respect of which makes it clear that the Inspector found that a level of less than substantial harm would be caused to heritage assets, including a grade I listed church. That notwithstanding, the Inspector concluded that landscape impacts would be neutralised by tree and hedgerow planting and, taking into account both the fact that the development would be on site for only 40 years, and the contribution that this would make to meeting the country's emissions reductions targets, the benefits were found to justify the heritage impacts, and planning permission was granted. Likewise, the limited time for which the proposal in this case would be on site and the significant tree and hedgerow planting proposed both need to be taken into account when determining this application, together with the significant contribution this would make to meeting emissions reductions targets, with the decision in the Woodland Farm application making it clear that this should be taken to outweigh a level of less than substantial harm to designated heritage assets when the planning balance is applied; and
- **Appeal Ref: APP/B3030/W/21/3279533** for a solar farm and battery storage on land north of Halloughton, Southwell, Nottinghamshire (approved 18 February 2022) – in which the main issues included the landscape and visual impact of the scheme, the effect on heritage assets, and the planning balance. Considering each of these in turn, the Inspector concluded that it is inevitable that large scale solar farms may result in landscape harm, with the key question being whether that harm would be outweighed by the benefits of a scheme, including the contribution that this would make to carbon reduction targets (which, in that case, it was found to do). And, having found there to be less than substantial harm to a number of heritage assets, this was also found to be outweighed by the benefits. Lastly, in



terms of the planning balance, it was highlighted that the time-limited nature of the proposal was a material consideration as well, with this again being something that equally needs to be taken into account when assessing this application, along with the other benefits outlined above. It should also be noted that Appeal Ref: APP/B3030/W/21/3279533 was determined before the most recent changes to NPPF and an even more positive approach should be taken now than was then, lending further support to the application being approved.

#### 4 The planning balance

4.1 When applying the planning balance, this must be done in accordance with the Development Plan, unless material considerations indicate otherwise. Most significantly in this respect, **Policy 41: Designated and Non-Designated Heritage Assets** of the BLP makes it clear that proposals which result in less than substantial harm to the significance of a designated heritage asset may be supported if it can be demonstrated that the public benefits will outweigh any harm identified. In doing which, Policy 41 effectively reflects the wording of Paragraph 215 of NPPF, which states that:

*“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”*

4.2 Thus, it is necessary to balance any less than substantial harm to identified heritage assets against the public benefits of the proposed development, in terms of which it should be noted that:

- there are questions over the extent to which the proposal would in fact cause any degree of harm, with the applicant’s Heritage Consultant concluding that there would in fact be no harm, as set out the heritage addendum, and the weight that should be given to any identified harm should be reduced accordingly;
- the proposed development would significantly contribute to meeting targets for both renewable energy production generally and solar energy specifically, and significant weight needs to be given to this, as required by the NPPF;
- related to the previous point, it is particularly important to take into account the extent to which renewable energy production has fallen behind levels required to meet targets at present (as highlighted in appeal reference APP/T3725/W/24/3347315, and confirmed to be something that should be taken



into account in that), and to recognise the contribution that the proposal would make to meeting that shortfall as a public benefit (as was also recognised in appeal reference APP/T3725/W/24/3347315); and

- it is also necessary to take into account the limited time for which the proposal in this case would be on site and the significant tree and hedgerow planting proposed as part of the application (following the approach taken in both appeal reference APP/W3520/W/24/3345132 and appeal reference APP/B3030/W/21/3279533, with the recent changes to the NPPF inviting an even more positive approach to be taken to this application to that assessed in terms of appeal reference APP/B3030/W/21/3279533 in particular, as also highlighted above).

4.3 Taking all of the above into account, it is considered that any less than substantial harm to identified heritage assets is more than outweighed by the public benefits that the proposed development would deliver. And, on application of the planning balance, this application should thus be supported in terms of both Policy 41 of the BLP and Paragraph 215 of the NPPF.

## 5 Conclusion

5.1 For the reasons given in the heritage addendum, it is considered that there is no impact on any identified heritage assets, and the application should thus be approved for the reasons given in the planning statement.

5.2 However, even if it was determined that less than substantial harm to any heritage assets would be caused, this would be outweighed by the public benefits that the proposed development would deliver, as set out above. Most notably, this would make a significant contribution to addressing current shortfalls in renewable energy generation needed to meet targets for both renewable energy generally, and solar energy in particular, to which significant weight must be given in accordance with the NPPF. As a result, the application should still be supported in terms of both Policy 41 of the BLP and Paragraph 215 of the NPPF accordingly, with the application also complying with all other relevant policy requirements for the reasons given in the planning statement.

5.3 In either case, the application complies with the Development Plan, and is also supported by other material considerations as set out in the planning statement and above, and should thus be approved.

