DAVID BELL PLANNING
CHARTERED TOWN PLANNERS

Three Oaks Renewable Energy Park Extension

Planning Application

Planning statement

June 2026

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Contents

1. Introduction and Overview

1.1 Background and Approach

1.1.1 This Planning Statement supports a planning application to construct, operate, maintain and decommission a wind farm development (along with associated development), to be known as the Three Oaks Renewable Energy Park Extension (hereafter referred to as the 'Proposed Development') submitted by Three Oaks REP Extension Ltd ('the Applicant') on land located within the administrative area of the East Riding of Yorkshire (ERoY).

1.1.2 Planning applications are required to be determined under the provisions of Section 38(6) of the Planning and Compulsory Purchase Act 2004 which requires that:

"If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.".

1.1.3 As such, the key questions for the Proposed Development are:

> Is the Proposed Development in accordance with the adopted Development Plan?

> Are there any material considerations to indicate otherwise?

1.1.4 The Courts have determined that it is sufficient that a proposal accords with the Development Plan when considered as a whole. It is not therefore necessary to accord with each and every policy. Rather, a balanced approach is required, with a focus on the policies of most relevance to a particular proposal.

1.1.5 The Proposed Development is considered to fall within Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (hereafter referred to as the 'EIA Regulations'). Wind turbines fall under Schedule 2 Category 3(i) – *"Installations for the harnessing of wind power for energy production (wind farms)"*, with the Proposed Development exceeding the thresholds set of 2 or more turbines, and being of greater than 15m in height.

1.1.6 A Pre-Application Advice Request was sought from ERoY Council in August 2025, which confirmed that the Applicant would volunteer to undertake an Environmental Impact Assessment (EIA), and that a Request for a Screening Opinion would not be sought.

1.1.7 The scope of the EIA was proposed through a Pre-Application Advice Request with the ERoY Council, who considered the proposed scope and provided comments to the Applicant on the proposed scope. ERoY Council's response has been considered during the EIA process and are addressed as reported in the accompanying Environmental Statement ('ES').

1.2 The Applicant

1.2.1 The Applicant is a Special Purpose Vehicle ('SPV') owned by Ridge Clean Energy Ltd. Ridge Clean Energy Ltd is a UK based clean energy company whose team has extensive experience developing, constructing and operating clean energy projects across the UK, including solar, wind, and associated infrastructure. Ridge Clean Energy Ltd's ethos is centred around community engagement and support throughout the lifetime of the project, creating an enduring and meaningful local impact.

1.3 Planning History

Three Oaks Renewable Energy Park Application Ref: 22/02777/STPLF

1.3.1 An application for a renewable energy park was granted permission by East Riding of Yorkshire on 24 March 2024 for the:

"Installation of a Renewable Energy Park comprising: ground mounted solar panels; access tracks; inverters; transformers; substation and battery energy storage system; customer cabin; underground cables and conduits; perimeter fence; CCTV equipment; temporary construction compound; and associated infrastructure and planting scheme at Land West Of Old Chalk Pit West Back Side Haisthorpe East Riding Of Yorkshire YO25 4NW"

1.3.2 The Site is located partly within, and immediately west of the site for the consented Three Oaks Renewable Energy Park.

1.3.3 The Applicant intends to submit an application to vary the site layout of the consented Renewable Energy Park, to allow T6 of the Proposed Development to be built out. Specifically, the variation will enable the removal of a small area of solar panels from the consented development to provide space to facilitate access to and construction and operation of the Proposed Development. The intention is to submit the necessary variation to ERoY Council in due course.

1.3.4 **Figure 2.3 Indicative Contextual Site Layout Plan** of the ES illustrates the relationship of the Proposed Development with the consented Renewable Energy Park (as proposed to be amended).

Thornholme Energy Park Application Ref: 11/03999/STPLFE

1.3.5 An application for a wind farm (Thornholme Energy Park) was refused planning permission by East Riding of Yorkshire in December 2012. The site of the refused Thornholme Energy Park and the Proposed Development overlap in places, however the site layout and turbine heights have changed. The Thornholme Energy Park comprised:

"Erection of 6 no. wind turbines (1 no. 110m to tip, 5 no. 100m to tip), a 70 metre anemometry mast and associated infrastructure."

1.3.6 The decision by East Riding of Yorkshire was subject to an appeal by Wind Prospect Developments Limited (the Applicant) to the Secretary of State. Following the Appeal and Public Inquiry, the Secretary of State dismissed the Appeal[1] in May 2014, contrary to the recommendations of the Inspector who recommended that the Appeal be allowed, and planning permission granted subject to conditions.

1.3.7 The three reasons for refusal related to unacceptable impacts in relation to MOD radar, landscape and visual impacts and impacts on designated heritage assets at Burton Agnes Hall. The reasons for refusal were as follows:

1. The proposed wind farm would cause unacceptable interference to the radar at RAF Staxton Wold, 16km from the site. The Ministry of Defence (MoD) have objected on the basis that the probability of the radar detecting aircraft flying over or in the vicinity of the turbine would be reduced and the RAF would be unable to provide a full air surveillance service.

The proposed wind turbines at this location would be in conflict with paragraphs 93 and 164 of the National Planning Policy Framework, and National Policy Statement (EN1) section 5.4. The benefits of generating green energy does not outweigh the significant harm the proposed

[1] Appeal Reference APP/E2001/A/13/2190363 Decision Available at: https://newplanningaccess.eastriding.gov.uk/newplanningaccess/files/4A0D846DB8EFE145378204EC344DF7F6/pdf/11_03999_STPLFE-Appeal_Decision-1666207.pdf

wind turbines at this location will have in securing safe RAF Air Defence radar at Staxton Wold.

2. The height, number and location of the turbines associated with the proposed wind farm would introduce uncharacteristic vertical structures into this relatively unspoilt part of the Wolds which is designated in the East Yorkshire Borough Wide Local Plan as an Area of Landscape Protection. The proposal would be visually dominant, detrimental to the landscape quality, visual amenity and rural character of the area. Sensitive receptors are present in the area as the vicinity of the site is used as a popular walking route and by motorists en route to nearby resorts and villages, and visitors to Burton Agnes Hall.

East Riding of Yorkshire Landscape Character Assessment (Landscape Character Area 13D) assesses the quality of the landscape as high quality with a high sensitivity to wind farm development. Benefits relating to the provision of renewable energy would not outweigh these adverse landscape and visual effects.

The proposal does not accord with National Planning Policy Framework paragraphs 98 and 109, guidance offered in National Policy Statements 1 and 3 (Section 5.9. of EN-1 and 2.7. of EN-3), Joint Structure Plan for Hull and East Riding of Yorkshire policies SP1(ii) and SP4(a), and East Yorkshire Borough Wide Local Plan policies EN2 (2, 3 and 5), EN3 (1 and 2), and EN25.

3. The proposal falls within the setting of the complex of designated heritage assets at Burton Agnes Hall. Paragraph 132 of the National Planning Policy Framework states that significance of heritage assets can be harmed by development within its setting and that substantial harm to designated assets of the highest significance should be wholly exceptional. Paragraph 134 states that this harm should be weighed against the public benefits of the proposal.

The site lies only 1.5km from Burton Agnes Hall complex which contains a nationally significant group of Grade I Listed buildings, which are open to the public. The views of the landscape surrounding the Hall make a significant contribution to the appreciation of the siting and context of the buildings and form an essential part of the baseline landscape setting. The overall impact on the setting of the complex would be harmful due to the dynamic views by visitors moving through the historic property making an important contribution to the overall significance of the heritage assets, which would be altered by the introduction of the tall moving turbines within important views.

The public benefits of the proposal arising from increased renewable energy provision would not outweigh the significant harm caused by the turbines to the setting of Burton Agnes Hall complex. The proposal is contrary to Regional Spatial Strategy (Yorkshire and Humber Plan) policy ENV9, Joint Structure Plan for Hull and East Riding of Yorkshire policy ENV6 and East Yorkshire Borough Wide Local Plan policy EN20.

1.3.8 Conversely in his consideration of the planning balance and having heard debate and cross examination at the relevant public inquiry, the Inspector acknowledged at paragraph 10.108 of his report that *"the proposal would cause a limited degree of harm to the landscape and to the setting and thereby less than substantial to the significance of designated heritage assets."* The Inspector continued that on this basis therefore the proposal did fail to accord with a number of policies of the Joint Structure Plan and Local Plan however he went on to conclude that "*the proposals would bring significant benefits through the generation of renewable energy, general economic activity, and in terms of the improved viability of the farms concerned. Given those benefits could be secured without undue harm to the landscape, living conditions, ecology or archaeology, the proposal complies with local plan policy EN 25"* which was the overarching policy of relevance to the proposal.

1.3.9 A very important factor and one which differentiates this application to the Thornholme Fields application, is that the national and local planning and energy policy position has materially evolved since the decision on the Thornholme Energy Park. At the time of the determination

there was in effect a defacto 'ban' on onshore wind in England (under the previous Conservative led Government). This was enforced through Ministerial Statements and evident by way of various refusals of the Secretary of State against Inspector recommendations to uphold onshore wind Appeals.

1.3.10 The position today has changed fundamentally since that time with the UK Government change at Westminster and a Labour administration for the UK in 2024 which set a new UK Government policy approach to supporting and encouraging onshore wind as a key technology to assist with the attainment of net zero. The publication of the Clean Power Action Plan in 2024 sets out the UK Government's commitment to delivering of clean power by 2030 and *"acknowledging the need to continue delivering new clean power infrastructure at pace after 2030 to keep up with increasing electricity demand."* (Page 57). The UK Government see the clean energy transition as a huge opportunity to generate growth and also to tackle the cost-of-living crisis. This objective is set out as Labour's "second mission" for the UK.

1.3.11 The Department for Energy Security and Net Zero ('DESNZ') issued a Statement on 08 July 2024 which included references to double UK onshore wind capacity from its current level of approximately 15 GW to a planned capacity of 30 GW by 2030. The Statement lifted the defacto ban on onshore wind in England, reversing the 2015 policy that had severely restricted new onshore wind projects. The planning constraints introduced by the previous Government were removed effective immediately upon the announcement. Onshore wind projects are now treated on an equal footing with other energy developments in the planning system.

1.3.12 The Labour administration aims to accelerate the pace of renewable development to achieve net zero, which is seen through the current Government's removal of the two footnotes to the National Planning Policy Framework that required developers to prove there was no local opposition to a proposed development, the publication of the Clean Power Action Plan 2030 and the Onshore Wind Taskforce Strategy 2025. These latter two documents are discussed in detail within Section 5 of this Planning Statement.

1.3.13 The Planning history is an important and relevant material consideration which must be considered in the planning balance alongside the other relevant material considerations. It is also acknowledged that each planning application must be determined on its own individual merits.

1.3.14 These matters are explored in the overall planning balance at Section 6 of this Planning Statement.

1.4 Structure of this Planning Statement

1.4.1 The structure of this Planning Statement is as follows:

- Section 2 provides details of the site and the Proposed Development;
- Section 3 assesses the Proposed Development against the key Development Plan policies;
- Section 4 considers if there are any material considerations, including national policy and other matters which determine a decision should be made contrary to the Development Plan or which give further support to the proposals;
- Section 5 examines the renewable energy legislative and policy framework which is another important material consideration which requires to be considered in the planning balance.
- Section 6 sets out the benefits of the Proposed Development.
- Section 7 provides overall conclusions and recommendations.

2. The Site, Proposed Development & Design Approach

2.1 Site Location and Description

2.1.1 The Proposed Development is located approximately 1.6 km to the northeast of Burton Agnes, 1.8 km south of Rudston, 1.2 km north of Thornholme and 0.9 km northwest of Haisthorpe. The Site lies within Burton Agnes Parish Council. The town of Bridlington lies approximately 4.7 km east, and the city of Hull lies approximately 27.5 km to the south of the Site.

2.1.2 There are a number of existing features in the landscape around the site, including two existing 66 Kilovolt (kV) overhead electricity cables running east/west through and to the south of the site, a lattice telecommunications tower situated immediately north of the site on Woldgate, the Carnaby industrial estate and longer distance views to the south towards existing wind farms (Fraisthorpe and Lisset Airfield).

2.1.3 The Site is located on a network of regular sized, mixed arable farmland comprising large and medium sized fields across an undulating and sloped terrain, defined by linear hedgerows with occasional trees. Two restricted byways follow a north-south orientation through the Site, bordered by hedgerows on both sides. The area taken by the development (that is, the wind turbines, site access and maintenance tracks and crane hardstandings) would be in the order of 5.34 hectares (13.19 acres), and would be 6.09 ha (15.04 acres) when including the Temporary Construction Compounds. The Application Boundary comprises the proposed infrastrucutre, blade swept area and land required to accommodate a proposed micrositing allowance, amounting to an area of 23.83 ha (58.86 acres).

2.1.4 The Proposed Development is accessed off the public lane (Unique Street Reference Number (USRN) 45908633), which itself is accessed from the highway (A614). The Site would contain the wind turbines and foundations along with crane hardstandings, met mast, site access and maintenance tracks, transformers, cabling and two temporary construction compounds.

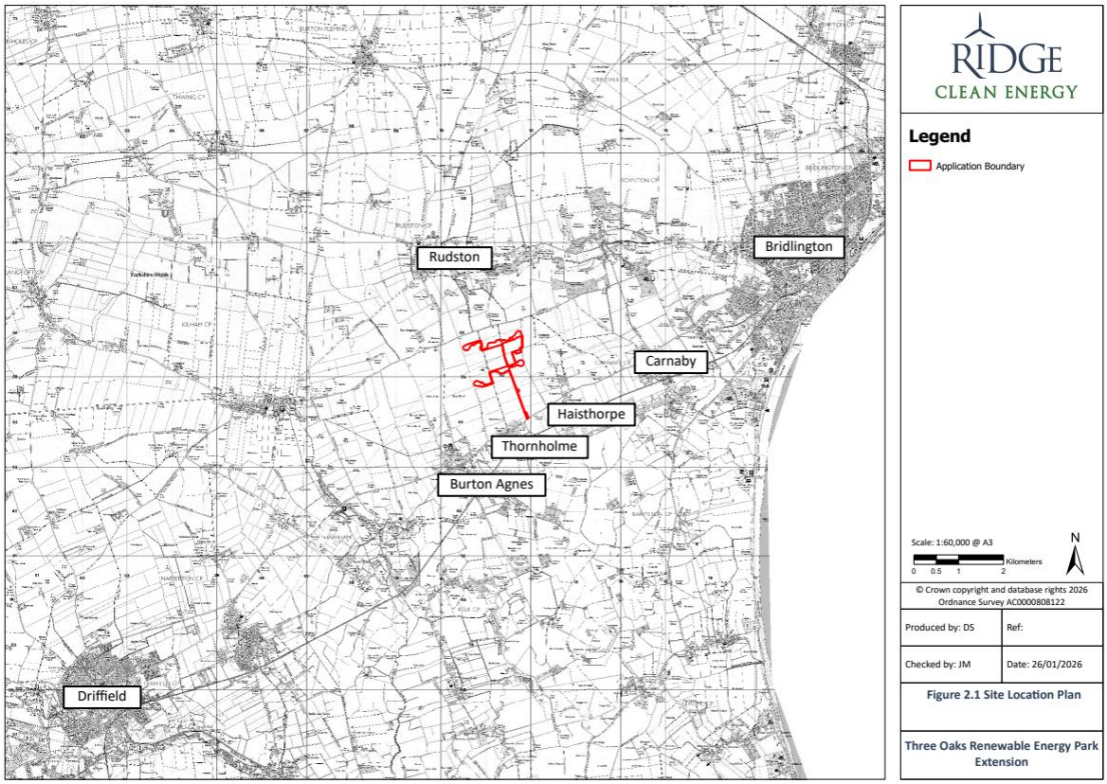
2.1.5 The site is located partly within, and immediately west of the consented Three Oaks Renewable Energy Park (planning reference 22/02777/STPLF).

2.1.6 No intrusive soil testing has taken place for the Proposed Development. However, such an assessment was undertaken for the adjacent Three Oaks Renewable Energy Park, which confirmed that site comprised a mix of Grade 2 (10.6%), 3a (19.8%) and 3b (69.6%) land (Baird, D., 2021). To provide a conservative assumption, it is assumed that land at the Site is Grade 2, and thus would be considered Best and Most Versatile (BMV) land.

2.1.7 North York Moors National Park lies approximately 22 km north of the Site at its closest point. Other than the restricted byways within the Site, Public Rights of Way are located in the wider area. The Blackpool to Bridlington (Aerospace Way) long distance route follows the Woldgate Roman Road, to the north of the Site, the Way of the Roses and National Cycle Route 1 are aligned to the west and north of the Site, the East Riding Heritage Way is aligned along the western restricted byway within the site and other routes with public access lie to the east.

2.1.8 The Site Location is presented in **Figure 2.1, Volume 3** of the ES and reproduced below at Figure 1.1.

Figure 1.1 Site Location Plan



2.2 Site Selection & Design Process

2.2.1 **Chapter 3 Site Selection, Design and Alternatives, Volume 2** of the ES, sets out details on site selection and design to arrive at a final design for the Proposed Development. The Applicant identified the Site as an optimal location for the Proposed Development, informed by consideration of electricity grid connection, land availability, energy resource, access and environmental sensitivity.

2.2.2 The design process followed a number of key design parameters which were retained throughout the design process as follows:

- Retaining a minimum distance from residential properties (minimum 800 m as applied by the Applicant);
- Minimum turbine spacing/separation of approximately 5 x rotor diameter downwind and 3 x rotor diameter crosswind, and a south-west prevailing wind direction;
- Retention of infrastructure within land made available for development to the Applicant;
- Public Rights of Way buffers;
- Known services;
- Avoidance of sensitive ecological habitat (where possible); and
- Consideration of slope and civil engineering requirements.

2.2.3 The site layout went through 5 design iterations responding to a variety of environmental constraints as detailed survey work and community consultation progressed, before arriving at the final design. Full details of the changes are included within ES Chapter 3. The site selection process has resulted in an optimal turbine layout maximising energy yield at the Site whilst reducing environmental impacts where possible.

2.3 The Proposed Development

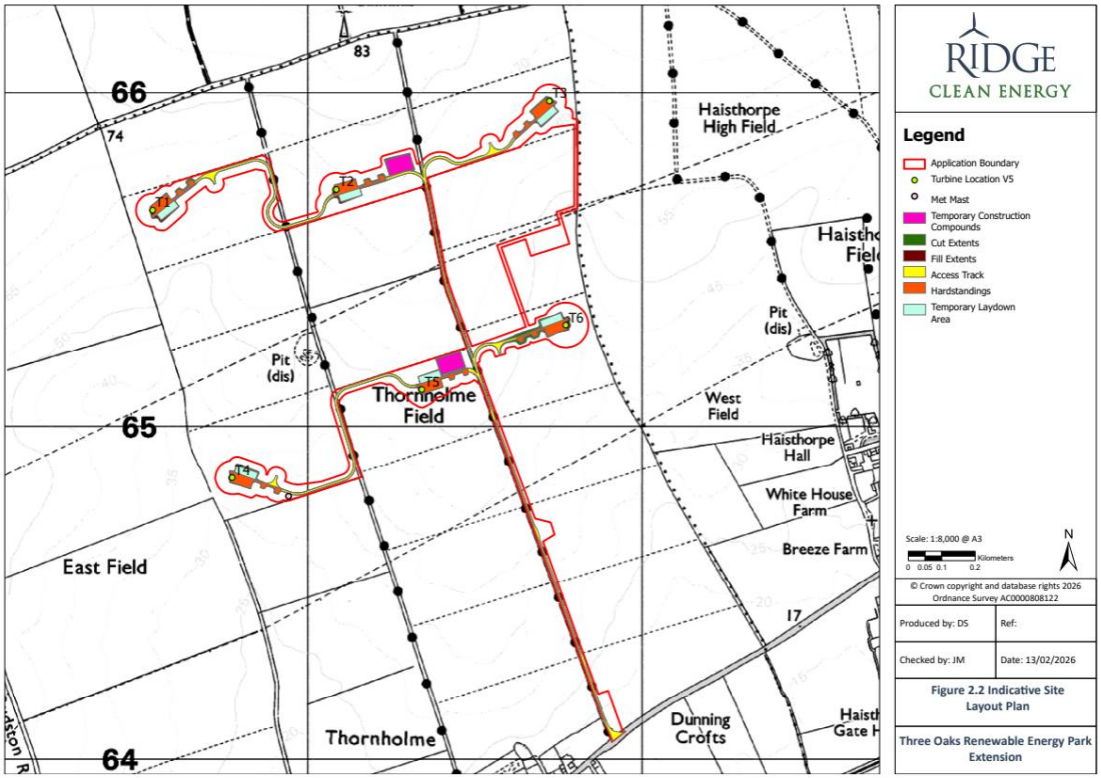
2.3.1 The component parts of the Proposed Development (with an export capacity of up to 25.2 MW) are as follows:

- 6 Wind turbines with a hub height of 91.4 m and rotor diameter of 117 m (tip height of up to 149.9 m).
- Associated Wind turbine foundations;
- Crane hardstandings;
- Met mast;
- Site access and maintenance tracks;
- Transformers;
- Cabling;
- Temporary construction compounds;
- Mitigation and Enhancement; and
- The substation and access tracks from the adjacent consented (yet to be built) Three Oaks Renewable Energy Park.

2.3.2 The Proposed Development would rely on access tracks and the substation within the consented (but yet to be built) Three Oaks Renewable Energy Park (planning reference 22-/02777-/STPLF), which as previously noted is located on land immediately east of, and partially surrounding (at proposed turbine 6) the Proposed Development. Cables from the turbines within the Proposed Development would generally be routed alongside site tracks to the substation, other than from T3 (the most north westerly turbine), where cables could be routed south through a dedicated cable trench of 343 m (approximately 1m wide and 1m deep) to the consented substation as illustrated in **Figure 2.3 Indicative Contextual Site Layout Plan, Volume 3** of the ES, or similarly alongside site tracks. The Application Boundary for the Proposed Development therefore incorporates these consented elements.

2.3.3 Further information on the Proposed Development can be found in **Chapter 2 Project and Site Description, Volume 2** of the ES, and is shown on **Figure 2.2 (Indicative Site Layout Plan), Volume 3** reproduced below at Figure 1.2.

Figure 1.2 Indicative Site Layout



Micrositing

2.3.4 In the event that unsuitable ground conditions are encountered during the construction of the Development, there may be a requirement to micro-site elements of infrastructure. It is proposed that a 25 m micro-siting allowance in any direction for turbines 1 to 5 and all other infrastructure is applied to the Development. Within this distance, any changes will be subject to approval of the Ecological Clerk of Works (ECoW) with specialist geotechnical advice as required. Turbine 6 would be subject to a 10m micrositing allowance due to its location within the confines of the Three Oaks Renewable Energy Park. Any microsited turbines would be required to maintain the 50 m blade-tip buffer from bat habitat and 30 m buffer from active badger setts, unless further ecological assessment/licensing is completed.

Environmental Mitigation and Enhancement

2.3.5 The EIA process has identified primary, secondary and tertiary mitigation as appropriate in relation to each of the environmental topics assessed. These are set out within each chapter and also within **Chapter 12 Schedule of Mitigation, Volume 2** of the ES.

2.3.6 In addition, an Outline Landscape and Biodiversity Mitigation and Enhancement Plan (oLBMEP) is provided at **Appendix 7.11, Volume 4** of the ES. The measures set out in summary include:

- Restoring most of the arable farmland affected by the temporary construction works to arable (no net change in biodiversity units (BU));
- Restoring 5.0 ha. of arable farmland to modified grassland (moderate condition, delivering 17.3 BU); and
- Creation of 0.97 ha of ponds (moderate condition, delivering 6.97 BU).

Construction

2.3.7 The construction phase for the Proposed Development is anticipated to commence in early 2028 and would last for up to eight months.

2.3.8 It is proposed that construction activities would be limited to between 07:00 and 19:00 Monday to Saturday, with no construction work expected on Sundays or Bank Holidays. Any works outside of these times (such as when turbine component parts are delivered to site, or conducting specialist activities such as continuous concrete pours which cannot be stopped prior to completion) would need to be approved in writing by ERoY Council, unless in an emergency situation.

2.3.9 It is proposed that a Construction Noise Management Plan (CNMP), a Construction Transport Management Plan (CTMP) and Construction Environmental Management Plan (CEMP) would be secured by way of planning condition, including a commitment to liaise with local residents and the wider community during construction. An outline CEMP is included at **Appendix 2.1 (oCEMP), Volume 4** of the ES, and outline CTMP is included at **Appendix 8.4 (oCTMP) – Volume 4**.

2.3.10 Further detail on construction activities including access arrangements is provided in **Chapter 2, Volume 2** of the ES.

Operation and Decommissioning

2.3.11 The Proposed Development would have an operational lifetime of 40 years.

2.3.12 It is proposed that operational site inspections will be undertaken on a weekly basis and the servicing of turbines will be undertaken as per the turbine manufacturer requirements, usually once or twice per year. Ongoing track maintenance will be undertaken to ensure safe access is maintained to all parts of the Proposed Development all year round.

2.3.13 Overall, it is estimated that the decommissioning period for the Proposed Development would be approximately 6-9 months. A decommissioning method statement would be prepared and agreed with ERoY Council in advance of the decommissioning period. It is anticipated that such a statement would be secured by way of a planning condition.

3. Planning Policy Appraisal

3.1 The Development Plan

3.1.1 The East Riding Local Plan Update ('ERLP Update') forms the suite of planning documents that together provide the long term development plan for the East Riding area. The ERLP Update documents are the starting point for determining planning applications in the region. It replaced the East Riding Local Plan adopted in 2016.

3.1.2 The plan covers the period 2020-2039 and is made up of a Strategy Document Update; an Allocations Document Update, accompanied by a Policies Map all adopted in April 2025.

3.1.3 East Riding Local Plan Strategy Document (ERLP SD) (April 2025)

3.1.4 Key policies of the ERLP SD for consideration within the planning assessment include:

- **Policy S1: Sustainable development;**
- **Policy S2: Addressing climate change;**
- Policy S4: Supporting development in Villages and the Countryside;
- Policy S9: Strengthening blue / green infrastructure;
- **Policy EC5: Supporting the renewable and low carbon energy sector;**
- Policy EC6: Protecting mineral resources;
- Policy ENV1: Integrating high quality design;
- Policy ENV2: Promoting a high quality landscape
- Policy ENV3: Valuing our heritage;
- Policy ENV4: International, National and Local Sites of importance for biodiversity;
- Policy ENV5: Enhancing biodiversity and geodiversity; and
- Policy ENV6: Managing environmental hazards (includes flood risk).

3.1.5 The primary determining policies are considered to be those highlighted in **bold** above.

3.1.6 The ERLP SD deals with renewable and low carbon energy at Chapter 6 'A Prosperous Economy' – which is one of the key objectives for the Council. Paragraph 6.62 onwards relates to 'Supporting the renewable and low carbon energy sector'. The introductory paragraphs make reference to the UK's legally binding targets to reduce greenhouse gas emissions by at least 80 per cent relative to 1990 levels by 2050 – this target has now been updated to reach 100% reduction by 2050. Further to this, the ERLDP SD highlights the aim to decarbonise 95 per cent of British electricity production by 2035 to meet the Sixth Carbon Budgets – this target was updated in 2024 following publication of the Clean Power Action Plan to reach this target by 2030. These documents, amongst others, are referred to in detail in Section 5 of this Planning Statement.

3.1.7 Paragraph 6.65 notes that *"A shift towards low carbon and renewable energy generation over the plan period will help reduce emissions that cause climate change. This will contribute to fuel security and create opportunities for economic growth, particularly in relation to the Humber Renewable Energy Super Cluster Enterprise Zone and the Humber Green Port Corridor Enterprise Zone".*

3.1.8 The Proposed Development will make an important contribution to reaching the targets set by the UK government by 2030 and beyond. It will also deliver economic benefits to the area,

and these have been set out within Section 6 below, and in the accompanying Economic Statement submitted in support of the planning application.

3.2 Key Determining Policies

3.2.1 This section of the Planning Statement provides a detailed appraisal of the Proposed Development's accordance with the Development Plan. The three key determining polices have been dealt with first.

Policy S1: Sustainable development & Policy S2: Addressing climate change

3.2.2 The overarching principle contained in the NPPF is the promotion of sustainable patterns of development. This is also reflected in policies S1 and S2 of the ERLP SD which contains a presumption in favour of sustainable development, and which seeks to address climate change by supporting development that reduces greenhouse gas emissions.

3.2.3 Given the nature of the Proposed Development, it would make a valuable contribution in relation to addressing climate change targets. Policy S2 supports development that reduces the generation of additional greenhouse gas emissions and incorporates adaptation to the impacts of climate change. One of the ways in which this will be accomplished includes:

"H. Incorporating renewable, low carbon and decentralised energy generation and heat networks in appropriate locations and schemes where possible.

I. Supporting proposals that protect, enhance and link habitat networks to allow biodiversity to adapt to climate change."

3.2.4 The Proposed Development would deliver renewable energy in an appropriate location, adjacent to an already consented renewable energy park. Furthermore, the Proposed Development will protect and enhance habitat networks providing a minimum 10% net gain in biodiversity.

3.2.5 It is important to recognise that one of the greatest threats to biodiversity is climate change. The principal and essential benefit of the Proposed Development is a significant contribution of renewable energy, to facilitate the earliest possible decarbonisation of the energy system and the achievement of net zero no later than 2050, in accordance with the objectives of the Climate Change Act 2008 (as amended). The purpose of net zero is also to protect biodiversity and the earlier it can be achieved, the greater the benefits to biodiversity.

Policy EC5: Supporting the renewable and low carbon energy sector.

3.2.6 The policy is supportive of development in the energy sector, including onshore wind, where *"any significant adverse impacts are addressed satisfactorily, and the residual harm is outweighed by the wider benefits of the proposal."*

3.2.7 The supporting text to policy EC5 notes that development will be supported providing adverse environmental, social or economic impacts are satisfactorily addressed. Adverse impacts must be balanced with the wider benefits of the development, noting that the benefits could include, supporting the growth of the low carbon and renewable energy sector of the economy and reductions in emissions that cause climate change. The Proposed Development will contribute in this way as summarised in Section 6 of this Planning Statement.

3.2.8 The supporting text to the policy refers to a revised Landscape Character Assessment Update (2018) which has been prepared and includes a specific Wind Energy Development Sensitivity Study (Annex A). It identifies the relative sensitivity of the different landscape character types (LCTs) identified in the East Riding. In considering the different sensitivities, the study sets out an overall "Wind Energy Strategy" for each LCT, as shown on Figure 11 of the ERLP SD. The Site is located in LCT 13 which is shown on Figure 11 as an 'Area of Significant Constraint'. Notwithstanding, this sensitivity study has been done on a larger scale

than the assessments of landscape sensitivity presented in Appendix 5.3 (Baseline Landscape Character Analysis) Volume 4 of the EIA Report, and it is acknowledged in Annex A that it is important that each proposal is examined within its own specific landscape context, which has been undertaken within the landscape and visual appraisal set out in Chapter 5 Landscape and Visual Impacts of the ES. The Proposed Development is considered to be capable of being accommodated within the host landscape which is a large scale, simple, arable landscape, where the sloping topography and vegetation in the surrounding area provide a degree of screening which limits the extent of the effects on landscape character, landscape designations and visual amenity.

3.2.9 The policy notes that developments and their associated infrastructure should be acceptable in terms of the effects of the development on a range of factors. The Applicant has considered each of these in turn.

3.2.10 **Policy EC5 A part 1** deals with the cumulative impacts of a proposal. Cumulative matters have been assessed and addressed throughout each technical chapter of the ES where cumulative matters may arise. In considering each of the topics listed below under parts 2 and 3 of Policy EC5 A, cumulative matters are considered.

3.2.11 **Policy EC5 A part 2** deals with landscape matters and requires that *"the character and sensitivity of landscapes to accommodate energy development, with particular consideration to the identified Important Landscape Areas…, and for onshore wind energy developments, the Wind Energy Landscape Sensitivity Strategy*"

3.2.12 Chapter 5 Landscape and Visual of the ES considered the impacts on landscape character and landscape designations.

3.2.13 There are a number of landscape designations relevant to the Site. Flamborough Head Heritage Coast designation extends around Flamborough Head from Bridlington to Reighton. At its closest, it is 9km east-northeast of T3. It is designated by Natural England, therefore is a national but non-statutory landscape designation, designated for its landscape and recreational value.

3.2.14 There are two Important Landscape Areas ('ILAs') within the landscape and visual impact assessment ('LVIA') Study Area. The Yorkshire Wolds ILA and the Flamborough Head Heritage Coast ILA. The application site is considered to lie within the Yorkshire Wolds ILA, with the Flamborough Head Heritage Coast ILA coinciding with the previously mentioned Heritage Coast.

3.2.15 Parts of the proposed Yorkshire Wolds Area of Outstanding Natural Beauty ('AONB') (now known as a National Landscape) would be to the west, north and northwest of the Site, with the Proposed Development located at least 7.5km from the proposed AONB boundaries. The designation will not come into effect unless and until the Secretary of State confirms the Order, and timescales for this are currently unknown.

3.2.16 The Site is located within the Landscape character type (LCT 13): Open High Rolling Farmland and Landscape character area (LCA 13D): North Wolds Plateau Farmland. The landscape character of the Site is typical of LCA 13D.

3.2.17 The assessment set out within the ES notes that the Proposed Development would result in significant adverse effects on landscape resources on and around the site. Secondary mitigation is proposed as part of the oLBMEP which includes the planting of 477m of hedgerow along a field boundary on the Site and at the site entrance as well as planting of species rich grassland. This would reinstate a hedgerow previously lost through agricultural operations which would progressively mature reducing the impact on landscape fabric and landscape character on the Site.

Landscape Character

3.2.18 In relation to landscape character during construction, significant effects are predicted at the development Site and immediate surrounding area within LCA 13D (from Woldgate to the north to the A614 to the south and from Rudston Road to the west to Church Lane to the east).

3.2.19 During the operational phase, significant adverse effects would extend in to the part of LCA 13D that extends along the Wold slopes to the shelterbelt between Carnaby Temple and Church Lane just over 2km to the east of T3, to Woldgate 0.3 – 0.4km north of T1 – T3, to the A614 1.2km south of T4 – T6 and up to approximately 5km to the northwest and west of the Site.

3.2.20 In relation to LCA 19C North Holderness Open Farmland, the anemometer mast and wind turbines would have a significant effect on landscape character in the northern part of LCA 19C that extends to approximately 3km south of the Site (but excluding the Carnaby Industrial Estate) but not on the landscape character of the remainder of LCA 19C

3.2.21 There would be no significant adverse effect on landscape character beyond the Site and immediate surrounding area.

Landscape Designations

3.2.22 In relation to the Yorkshire Wolds ILA,, significant effects are predicted on the character and purposes of a small part of the Yorkshire Wolds ILA (the development Site and immediate surrounding area) during construction. These would be temporary and short lived.

3.2.23 Significant adverse effects on the Yorkshire Wolds ILA would also be experienced during operation within the Site and in the surrounding area that extends along the Wold slopes to the shelterbelt between Carnaby Temple and Church Lane just over 2km to the east of T3, to Woldgate 0.3 – 0.4km north of T1 – T3, to the A614 1.2km south of T4 – T6 and up to approximately 5km to the northwest and west of the Site.

3.2.24 Overall, the assessment notes that no key landscape features would be lost within the designation but there would be a significant adverse effect on landscape character within the Yorkshire Wolds ILA . Therefore, the assessment concludes that the purpose of the designation (to protect and enhance landscape characteristics and features) would not be fully met and the operational phase would have a significant effect on this small part of the Yorkshire Wolds ILA but not on the remainder of this local landscape designation.

3.2.25 In relation to the Yorkshire Wolds AONB and Flamborough Head Heritage Coast ILA, the assessment concludes that there would be no significant effects predicted.

Cumulative

3.2.26 The assessment has also considered the effect of the Proposed Development in a cumulative context. The cumulative assessment considered operational wind turbines, the Three Oaks Renewable Energy Park, the permitted but not yet built Carnaby Wind Farm and the other permitted developments in the study area. The Proposed Development would be at a distance from the existing operational and permitted wind farms and would appear similar to these in terms of scale and design, whilst being in a different sector of the view from most locations within the study area. The assessment concludes that the additional cumulative effects of the Proposed Development would be similar to the additional effects of the Proposed Development on its own.

3.2.27 **Policy EC5 A Part 3** deals with a number of criteria and these are taken in turn.

i. local amenity, including noise, air and water quality, traffic, vibration, dust, light (including reflection, glint, glare and shadow flicker), and visual impact

3.2.28 Each of the matters relating to local amenity have been addressed within the accompanying ES.

3.2.29 **Noise and Vibration: Chapter 9 Noise and Vibration, Volume 2**, in the ES concludes that during construction and decommissioning noise will be insignificant for activity on the main wind farm site. Some audible noise will occur from the transportation of construction material and wind farm components however this is predicted to be negligible when compared with baseline traffic flows. Construction noise can be managed through the CEMP. In relation to operational noise from turbines, the Proposed Development has demonstrated that it can meet noise limits based on the measured background noise locations which are representative of the nearest receptors. Noise levels at all other locations are very low in absolute terms. No significant environmental effects associated with operational noise at any stage of the Proposed Development are identified. Cumulative developments have also been considered in Chapter 9 and there are no predicted significant cumulative effects arising in relation to noise or vibration from the Proposed Development in combination with other developments considered.

3.2.30 The ES concludes that there would be no significant effects in relation to vibration from construction noise or wind turbines operating as a result of the Proposed Development.

3.2.31 **Air Quality/Dust:** There are no material operational emissions or impacts to air quality from the Proposed Development. During the temporary construction and decommissioning period the increase of construction vehicles above background levels would be minimal, and risk of emissions (such as dust from construction processes or vehicles) would be appropriately controlled through the implementation of the CEMP. Owing to the mitigation proposed, no cumulative effects are anticipated.

3.2.32 **Water quality:** With the implementation of a surface water monitoring programme and the implementation of a surface water drainage strategy, which will be delivered as installation of infrastructure progresses to manage any construction water runoff (as secured via the CEMP) and to mitigate operational surface water runoff, any effects on the water environment are anticipated to be acceptable. Construction surface water will be managed in accordance with CIRIA[2] guidance. Standard best practice measure will be applied during the construction stage to minimise the risk of pollution on the water environment.

3.2.33 **Traffic:** Chapter 8 Traffic and Trasport of the ES considers non-motorised user amenity and general impacts relating to traffic impacts. The forecast changes in traffic flows associated with construction traffic are modest across all highway links, with the exception of the A614 through Burton Agnes and Thornholme. In all other cases the percentage change in total traffic flow and HGV movements is well below levels that would approach a halving or doubling of traffic flows. Given the limited scale of traffic change, the absence of exceedance of screening thresholds, and the rural character of the majority of the construction traffic route, the forecast changes in traffic conditions would not be expected to result in a perceptible change in the amenity experienced by pedestrians and other non-motorised users.

3.2.34 For the A614 through Burton Agnes and Thornholme, the addition of approximately 8 two-way vehicle movements per hour with no observed congestion is not considered sufficient to give rise to any perceptible change in the amenity experienced by pedestrians, cyclists or equestrians through the villages. The assessment of the effect on non-motorised user amenity is assessed as negligible and not significant in EIA terms across all links on the construction traffic route, including the A614 through Burton Agnes and Thornholme.

3.2.35 As noted, there are two roads running through the site. In respect of the unnamed access road, the road will be closed to all traffic other than construction and farm vehicles throughout the construction period. The residual effect on general road users is therefore negligible and not significant in EIA terms, on the basis that no general road users will be present on the route during construction. In respect of Westend Farm Lane, the modest and temporary nature of construction vehicle crossing movements, the low frequency of such events and the rural and unmetalled character of the route mean that residual effects on users are inherently

[2] Construction Industry Research and Information Association

limited. The residual effect is therefore assessed as negligible and not significant in EIA terms.

3.2.36 In terms of severance, having regard to the rural and unmetalled character of both roads, their primary agricultural function, and the absence of any community facilities or residential receptors directly reliant on traversing these roads, the construction traffic associated with the Proposed Development would not give rise to any perceptible severance of community links. Two alternative routes connecting the A614 with Woldgate are available in close proximity, located approximately 1.8 km to the east and 1.4 km to the west respectively, both of which are surfaced and offer an improved travelling surface relative to the closed road. Whilst Westend Farm Lane and the Bridlington Heritage Route would be subject to periodic management during delivery movements crossing the road, these interactions would be brief and temporary in nature. The effect on severance is therefore assessed as negligible and not significant in EIA terms for both roads.

3.2.37 No significant cumulative effects on Traffic and Transport are expected. The assessment notes that even in the event of limited temporal overlap between the schemes identified in the cumulative assessment, any resultant cumulative change in traffic flows would be temporary and, given the small scale of forecast construction traffic changes on the assessed routes and the screening outcomes reported, is unlikely to give rise to a significant effect at a local or regional scale.

3.2.38 **Shadow Flicker:** There is no formal limit on the amount of shadow flicker that is considered acceptable in the UK, however (based on available guidance) the threshold of 30 minutes per day or 30 hours per year is generally used in assessments. Shadow Flicker has been examined in Chapter 10 of the ES. The assessment identified five residential dwellings within 10 rotor diameters of the turbines, all within Haisthorpe to the south east of the Proposed Development. The assessment concluded that Turbine 6 was the only turbine that would potentially result in shadow flicker occurring, and that four of the five properties could be theoretically affected above the thresholds, presuming a worst-case scenario. There are no cumulative schemes where a 10 x rotor diameter study area would overlap with that of the Proposed Development, and thus cumulative shadow flicker effects cannot occur.

3.2.39 Mitigation for shadow flicker is readily adopted and commonplace across the UK, which can take the form of remote automatic wind turbine shut down for specific turbines under specific climatic conditions such that no neighbouring property would experience an occurrence above the threshold. The Applicant is committed to a Shadow Flicker mitigation strategy which can be controlled by condition. The assessment concludes that with the application of this mitigation, it would reduce theoretical impacts to be at, or below acceptable levels, and as such the ES concludes that there would be no adverse effects from shadow flicker to residents.

3.2.40 **Visual impact:** Chapter 5 considers visual amenity including residential visual amenity. A Residential visual amenity assessment ('RVAA') has considered the effects on properties within and just beyond 10 x rotor diameter (1.17km) from the nearest proposed wind turbine. The RVAA concludes that for each of the four properties assessed, the Proposed Development would not, by virtue of its scale and proximity, be an unpleasantly oppressive and unavoidable presence in views "in the round" and as such would not breach the residential visual amenity threshold.

3.2.41 In terms of other visual receptors, the operational phase would have a significant effect on:

- Visitors to one location on the Hockney Trail (at Viewpoint 2) and to All Saints Church, churchyard and Monolith in Rudston (Viewpoint 11).
- Walkers, cyclists and equestrians - on the five local Public Rights of Way ('PRoWs') (other routes with public access) that run down the Wold slope on and around the site between Rudston Lane and Church Lane, and on short sections of NCN Route 1 and four long distance recreational routes (Beverley Minster to Bridlington Priory, Blackpool to

Bridlington (Aerospace Way), East Riding Heritage Way and Way of the Roses) where these follow a 3km section of Woldgate to the immediate north of the Site and a local PRoW to the east of the site.

- Motorists – on the single track lanes around the Site including a 3km section of Woldgate, a 700m section of West Back Side in Haisthorpe, a 2.8km section of Rudston Road and Back Lane east of Burton Agnes and a 1.9km section of Church Lane north of Carnaby and on the A614 to the south of the Site, in particular, a 0.6km section between Burton Agnes and Thornholme and a 1km section between Thornholme and Haisthorpe.

3.2.42 In terms of cumulative matters, at two of the viewpoints (Viewpoints 12 and 17) the two Carnaby wind turbines would be close and clearly visible and the addition of these to the likely future baseline would very slightly (Viewpoint 12) and slightly (Viewpoint 17) reduce the susceptibility of the landscape and visual receptors, but not sufficient to reduce their sensitivity. However, at the other eight viewpoints (Viewpoints 1, 2, 4, 5, 7, 14, 16 and 18) the two Carnaby wind turbines would be largely or entirely screened by intervening vegetation, and the addition of these to the likely future baseline would not affect the value, susceptibility or sensitivity of the visual receptors. The additional cumulative effects of the construction, operational and decommissioning phases of the Proposed Development in the context of the likely future baseline would be similar to the additional effects of the construction, operational and decommissioning phases of the Proposed Development in its own right.

ii. biodiversity, geodiversity and nature, particularly in relation to designations, displacement, disturbance and collision and the impact of emissions/ contamination;

3.2.43 Chapter 7 of the ES deals with biodiversity and notes that the potential effects of the Proposed Development include collision risk to birds and bats, disturbance/displacement of birds, and habitat loss/fragmentation associated with access tracks, turbine bases and cabling. Construction could affect other mammals, including badgers, through noise, vibration and ground disturbance.

3.2.44 There are seven statutory designated internationally/nationally important nature conservation sites in the search area around the Proposed Development which include:

- Boynton Willow Garth Site of Special Scientic Interest ('SSSI') – 1.4 km NE– one of the best examples of fen carr in North Humberside, and is particularly important for the range of trees and shrubs it supports.
- River Hull Headwaters SSSI – 3.3 km SW – nationally important as the most northerly chalk stream system in Britain, with riverside grassland, woodland and fen. It also supports diverse invertebrate and breeding bird communities.
- Greater Wash SPA – 7 km SE – marine site designated for its populations of common scoter, common tern, little gull, little tern, red-throated diver, and Sandwich tern.
- Flamborough and Filey Coast Special Area of Conservation (SAC) – 8 km E – designated habitats including reefs, vegetated sea cliffs of the Atlantic and Baltic coasts, and sea caves.
- Flamborough and Filey Coast Special Protection Area (SPA) – 10 km E – internationally important breeding seabird colony.
- Hornsea Mere SPA – 18 km SE – important wetland habitat designated for its populations of gadwall and mute swan.
- River Derwent SAC – 29 km NW – riverine wetland designated primarily for its population of river lamprey but also for its riverine plant community and its populations of sea lamprey, bullhead and otter.

3.2.45 The potential connectivity of each of the internationally important sites (SPA/ SAC/Ramsar) to the site has been considered and no qualifying features of any SPA/SAC/Ramsar site were identified that could be ecologically linked to the Proposed Development.

3.2.46 Overall, there are not likely to be any significant residual effects on ecology as a result of the Proposed Development subject to the implementation of the identified mitigation measures (and which are required to ensure compliance with the nature conservation legislation). The Proposed Development would not affect the conservation status of any species/community of conservation importance, either alone or in-combination with other schemes. It would also not contribute to any likely significant effect on any SPA or SAC qualifying interests. No effects would result in any breach of the Habitats Regulations. No significant effects are predicted in relation to disturbance to badgers and other protected species.

3.2.47 It is also concluded in the ES at Chapter 7 that the Proposed Development would not make any material contribution to any likely significant cumulative ecological effect.

iii. the historic environment, including individual and groups of heritage assets above and below ground

3.2.48 Chapter 6 of the ES deals with the historic environment. Eight archaeological receptors have been identified where the likely effect is significant. Secondary mitigation has been identified in the form of a phased approach of archaeological investigations beginning with pre-commencement trial trench evaluation. Further excavation and recording would then be agreed with the Development Management Archaeologist of the Council. All archaeological works would be carried out to a Written Scheme of Investigation ('WSI') agreed with ERoY Council.

3.2.49 The implementation of a programme of archaeological works will reduce the magnitude of impact and therefore the significance of effect. The harm to the archaeological receptors will be offset by recording archaeological remains, enhancing the archaeological knowledge of the area and informing regional research objectives. This would reduce the magnitude of impact on these receptors to slight and therefore is deemed not significant.

3.2.50 In relation to operational effects the assessment identified 16 heritage assets comprising nine Scheduled Monuments, one Conservation Area, five Listed Buildings and one non-designated heritage asset.

3.2.51 In relation to operational effects on the Scheduled Monuments considered in the assessment it is concluded as follows:

- For the Scheduled Monuments of Rudston Monolith, Sands Wood Round Barrow, Roman Villa site and Romano-British Villa east of Sandy Lane which have a high sensitivity, the magnitude of impact has been assessed as negligible which would result in a temporary adverse effect which is slight and is not significant in EIA terms.
- For the remaining scheduled monuments, namely: Rudston Beacon and Round Barrows to East, Earthwork (Rudston 'A' Cursus) on the Sheepwalk, South Side Mount Barrow, Low Caythorpe Deserted Medieval Village and the Settlement Site at Boynton Hall the assessment concludes that the Proposed Development is not within the immediate setting of the assets and the visual impact will be reduced by the primary mitigation of the colour of the turbines. The visual impact will also be reduced by distance, topography and screening from landscape features. Due to these factors, the overall likely significant effect is considered to be at the lower end of the scale and will be a temporary adverse effect which is slight and is not significant in EIA terms.

3.2.52 In relation to operational effects on Listed Buildings considered in the assessment it is concludes as follows:

- For the Listed buildings of the Church of All Saints at Rudston and St John the Baptist Church at Carnaby, these have high sensitivity and the magnitude of impact will be

negligible which will result in a temporary adverse effect which is Slight and is not significant in EIA terms.

- For the listed buildings of Carnaby Temple, Thorpe Hall and Burton Agnes Hall, the Proposed Development is not within the immediate setting of Carnaby Temple and Thorpe Hall and visual impact will be reduced by the primary mitigation of the colour of the turbines. This mitigation is generally considered to serve to reduce the prominence of turbines against the skyline and reduce visual impacts. This in turn would reduce indirect impacts on the setting of heritage assets. The visual impact will also be reduced by distance, topography and screening from landscape features such as field boundaries. Designed landscape features such as plantations will also screen Thorpe Hall. Due to these factors, the overall likely significant effect is considered to be at the lower end of the scale and will be a temporary adverse effect which is slight and is not significant in EIA terms for Thorpe Hall and Carnaby Temple. The views to the north-east from Burton Agnes Hall are not considered to be designed views such as those to the south and east and as such contribute less to an appreciation of the asset. The view will also be restricted by the plantation and tree belt which is part of the designed landscape of the Hall. The overall likely significant effect is considered to be at the lower end of the scale and will be a temporary adverse effect which is slight and is not significant in EIA terms.

3.2.53 No significant effects are predicted on the Burton Agnes Conservation Area. The assessment notes that topography, tree belts and buildings provide effective screening and the Proposed Development would only be partially visible from the eastern side of the Conservation Area. No designed views would be disrupted.

3.2.54 The Historic Environment Record records 143 non-designated heritage assets. Two non-designated assets are located within 1 km of the Proposed Development and these were also considered as part of the assessment: White House Farm and former Primitive Methodist Chapel. In relation tot eh latter, the Proposed Development would be to the north-west and this view does not contribute towards an appreciation of the asset within the village. The asset is not considered to be affected. In terms of White House Farm, this would have a low sensitivity and minor magnitude of impact resulting in a temporary adverse effect which is slight – neutral and is not significant.

3.2.55 Chapter 6 of the ES considers the cumulative context and concludes that there would be no cumulative significant effects in relation to heritage assets as a result of the Proposed Development in combination with other proposals considered.

iv. telecommunications and other networks; including the need for additional cabling to connect to the National Grid, electromagnetic production and interference, and aeronautical impacts such as on radar systems

3.2.56 These matters have been considered within Chapter 10 of the ES insofar as they are relevant to the Proposed Development.

3.2.57 In relation to electromagnetic interference ('EMI'), only Joint Radio Company ('JRC') and Mobile Broadband Network Limited ('MBNL') raised concerns. Following further assessment undertaken by JRC, the proposed wind turbines have been micro-sited to avoid conflicting with their asset and thus it is considered that there would be no associated impact.

3.2.58 In relation to MBNL, two turbines (T2 and T5) infringe on the 100m-buffer for one of their links. Through micro siting allowances it is predicted that the Proposed Development has the ability to be clear of the Fresnel Zones. T2 and T5 will therefore be micro-sited if required. Due to the ability to microsite turbines outside of Fresnel Zones and owing to the available mitigation (in the form of technical solutions such as changing the receptor height or re-orientating the receptor to receive signals from an alternative transmitter) in the event an issue should be attributable to the Proposed Development, no EMI impacts are anticipated. No cumulative schemes affect the same links as affected by the Proposed Development. Accordingly, no adverse cumulative effects are anticipated in relation to EMI.

3.2.59 **Grid connection**: the ES notes at Chapter 3 that electricity generated from the Proposed Development will be exported through on-site cabling to the consented substation at the adjacent Three Oaks Renewable Energy Park, which will connect to the electricity distribution network via the existing 66 kV overhead line to its immediate north, which runs in a broadly east to west alignment. However, the two developments would be managed via separate grid connection agreements. Cables would generally be routed alongside site tracks, other than from T3, which could be routed via site tracks or south through a dedicated cable trench (approximately 1 m wide and 1 m deep) to the substation.

3.2.60 In relation **to aviation**, the Applicant has commissioned an Aviation Safeguarding Assessment Report (Appendix 10.3 of the ES). The assessment concludes that there may be an adverse effect from the Proposed Development in relation to MOD radars, the Vale of York Area of Intense Aerial Activity ('AIAA') and Southern Military Danger Area ('MDA'). It is considered that once the application is submitted, further consultation can be undertaken with the MOD to agree suitable mitigation. This may be in the form of the existing upgrading of assets, or through liaison, to remove any aviation safeguarding concerns which may be raised. This can be agreed via an appropriately worded planning condition, such that the Proposed Development would not proceed until such time as the relevant aviation bodies are satisfied. Accordingly, no significant adverse impacts are predicted in relation to Aviation. No cumulative aviation effects are anticipated.

v. transport, including the opportunity to use waterways and rail for transportation of materials and fuel, and the capacity of the road network to accommodate development

3.2.61 As noted above, Chapter 8, Volume 2 of the ES deals with traffic and transport. The assessment has demonstrated that, with the embedded and secondary mitigation measures in place, the Proposed Development would not result in significant adverse effects on the local highway network, pedestrian or non-motorised users, or road safety.

3.2.62 Construction traffic will be managed through the implementation of a robust CTMP, with all abnormal indivisible loads controlled via an agreed routing and escort strategy. Operational traffic movements are limited to infrequent maintenance visits and therefore negligible. Decommissioning effects are anticipated to replicate those identified for construction and are not considered significant.

3.2.63 No significant cumulative impacts have been identified when the Proposed Development is considered alongside other relevant committed schemes in the area.

3.2.64 The assessment concludes that the Proposed Development is not expected to give rise to any significant residual or cumulative effects on traffic and transport, and the proposals are therefore considered acceptable in highways and transport terms.

vi. increasing the risk of flooding;

3.2.65 The footprint of the Proposed Development is 6.09 ha and lies wholly within Flood Zone 1. The Proposed Development also falls outside of any area prone to surface water flooding. Given the scale of the site a standalone Flood Risk Assessment ('FRA') has been undertaken. In summary, the FRA concludes that the Proposed Development will be safe from all forms of flooding and reduce downstream flood risk and pollution. As no impacts are anticipated, there would be no cumulative effects in relation to hydrology and flood risk.

vii. the land, including land stability, contamination, best and most versatile agricultural land and soil resources.

3.2.66 No intrusive soil testing has taken place for the Proposed Development, however, such an assessment was undertaken for the adjacent Three Oaks Renewable Energy Park, which confirmed that site comprised a mix of Grade 2 (10.6%), 3a (19.8%) and 3b (69.6%) land, as explained in Chapter 10 of the ES. To provide a conservative assumption, it is assumed that land at the Site is Grade 2, and thus would be considered Best and Most Versatile ('BMV') land.

3.2.67 The area taken by the development (that is, the wind turbines, site access and maintenance tracks and crane hardstandings) would be in the order of 5.34 hectares (13.19 acres). When incorporating the 5 ha of land allocated (within the Application Boundary) for Biodiversity Net Gain, the operational footprint of development would be 10.34 ha.

3.2.68 Over the lifetime of the Proposed Development soil health can recover from intensive agricultural use. Following decommissioning, other than access tracks which would be left in situ, land would be returned to agriculture with an increased soil organic carbon content.

3.2.69 Applying the land temporarily lost against each agricultural grading, the Proposed Development would cause the temporary loss of 0.15%, 0.01% and 0.01% of local Grade 1, 2 and 3 agricultural land (BMV) respectively, and 0.003%, 0.0006% and 0.0002% of national grade 1, 2 and 3 agricultural land (BMV) respectively. Owing to such small and temporary losses, in the broader context as set out above, impacts to BMV land from the Proposed Development are considered negligible.

3.2.70 Overall, when considering agricultural land overall across each of the grades affected, the Proposed Development would result in the temporary loss of 0.005% of agricultural land locally and 0.0001% of agricultural land nationally. Therefore land take from the Proposed Development is considered negligible.

3.2.71 **Policy EC5 B** deals with decommissioning and requires proposals to include provision for decommissioning. High level details on decommissioning have been set out within Chapter 2 Project Site and Description of the ES. A decommissioning method statement would be prepared and agreed with ERoY Council in advance of the decommissioning period. Any decommissioning method statement or strategy can be secured by condition should planning permission be granted.

Policy EC5 Conclusions

3.2.72 The Proposed Development would result in some limited significant adverse landscape and visual effects which are inevitable in relation to commercial scale onshore wind energy development. These would extend in landscape terms on a localised basis to approximately 5 km from the site. Significant visual effects are also predicted within a localised area, extending for the most part to approximately 2-3 km from the Site. There is the potential for significant effects on visual amenity for residents in properties with open views up to 5km from the Proposed Development. However, the majority of residential properties within 5km are in villages, with views screened by surrounding properties, or are farm houses and individual properties which are surrounded by farm buildings and/or shelterbelts which would screen views of the Proposed Development.

3.2.73 In terms of landscape designations, there would be no significant adverse effects on national landscape designations. The assessment identifies that there would be some significant adverse effects on a small part of the Yorkshire Wolds ILA. The assessment concluded that the purpose of the designation (to protect and enhance landscape characteristics and features) would not be fully met. There is some degree of conflict with this aspect of Policy EC5 of the ERLP SD which requires to be weighed in the planning balance overall.

3.3 Other Development Plan Policies

Policy S4 Supporting development in Villages and the Countryside

3.3.1 The Site lies outside any defined development limits and therefore lies in a countryside location. As such, policy S4 of the ERLP SD is relevant. Policy S4 (A) of the ERLP SD seeks to support development that helps to maintain the vibrancy of Villages and the Countryside where such development is of an appropriate scale to its location, encourages the re-use of previously developed land, does not involve a significant loss of best and most versatile agricultural land and where the proposal respects the intrinsic character of its surroundings. Policy S4 (D) lists a number of forms of development that would be acceptable in a

countryside location, subject to the development being in keeping with the intrinsic character of its surroundings. The Proposed Development would meet criteria 11 of part D of policy S4 which relates to 'Energy development and associated infrastructure'.

3.3.2 In relation to agricultural land, which is discussed in detail above under Policy EC5, when considering agricultural land overall across each of the grades affected, the Proposed Development would result in the temporary loss of 0.005% of agricultural land locally and 0.0001% of agricultural land nationally.. Therefore, land take from the Proposed Development is considered immaterial and not a significant loss of best and most versatile agricultural land in line with Policy S4.

Policy EC6: Protecting mineral resources

3.3.3 The site lies in proximity to areas identified on the Proposals map as being safeguarded for mineral resources. Turbine one and two of the Proposed Development are located on the edges of this Mineral Safeguarding Area.

3.3.4 The Proposed Development would not impact or sterilise the land such that it would prevent mineral extraction in the future, as required by EC6. In terms of the current need to tackle the climate change crises, and increase the amount of nationally produced clean energy in order to reach net zero, it is considered that the need for the Proposed Development is an important consideration and one which would outweigh any potential impact on any mineral deposit, as allowed for under Part B (2) of the policy. Furthermore, the Proposed Development is temporary in nature, and the land could be used for mineral extraction in the future on cessation of the Proposed Development.

Policy ENV1: Integrating high quality design

3.3.5 A number of design considerations were set from the outset to minimise effects on the environment particularly from a landscape and visual perspective.

3.3.6 A Design and Access Statement ('DAS') has been prepared and is submitted in support of the application for planning permission. It demonstrates how the Site and its surroundings have been appraised to ensure that the final design solution achieves a balance across a range of environmental factors such that it would result in an acceptable proposal from a design perspective. The DAS and ES submitted demonstrate that the Proposed Development would safeguard and respect the diverse character and appearance of the area through its design and layout delivering a cohesive and well-designed proposal which minimises landscape and visual effects in so far as possible.

3.3.7 The Proposed Development would accord with Policy ENV1.

Policy ENV2: Promoting a high quality landscape

3.3.8 Landscape matters are discussed in detail above under Policy EC5, and as such are not repeated here. The LVIA undertaken addresses the matters set out within Policy ENV2.

3.3.9 There would be some loss of native hedgerow within the Site (289m). An oLBMEP has been submitted, and one of the proposals includes the planting of 477 m of species-rich native hedgerow to mitigate and achieve enhancement on the Site.

3.3.10 The policy states that *'Proposals should protect and enhance existing landscape character'*. In relation to the Yorkshire Wolds ILAs, it states *'with special attention to ensuring developments are of an appropriately high quality and will not adversely affect the historic and special character, appearance or conservation value of the designation'*; and in relation to the Heritage Coast designations that proposals are compatible with their special character.

3.3.11 The LVIA concludes that significant adverse effects are predicted on the character and purposes of a small part of the Yorkshire Wolds ILA, extending out to approximately 5km to

the northwest and west of the Site. No significant effects are predicted for the Flamborough Head Heritage Coast or the proposed Yorkshire Wolds AONB.

3.3.12 The Proposed Development would result in some non-accordance with Policy ENV2 in relation to the resulting adverse effect on a small part of the character of the landscape designation. However, it would not go as far as to significantly affect the special characteristics and purpose of the designation as a whole.

3.3.13 This minor conflict requires to be weighed in the planning balance.

Policy ENV3: Valuing our Heritage

3.3.14 The Proposed Development has been considered above in relation to heritage assets under policy EC5 Part 3 (iii) and no significant adverse effects are predicted on the heritage assets assessed.

3.3.15 Policy ENV3 part B requires that *"In determining applications, proposals that conserve or enhance the significance of a heritage asset and its setting should be supported. Development that will cause harm to the significance of a heritage asset will only be granted where clear and convincing justification for the proposed harm can be demonstrated in line with national planning policy requirements. Where harm cannot be avoided the applicant will need to prepare a scheme that minimises and mitigates the harm caused by development and demonstrate that the harm is appropriately weighed against public benefits in accordance with national policy."*

3.3.16 The assessment notes that slight significant effects are predicted on eight designated assets which is not significant in EIA terms and is not considered to constitute substantial harm under NPPF. The Proposed Development will deliver public benefits insofar as it relates to the production of clean and sustainable renewable energy over the 40-year lifespan of the scheme which would be exported to the grid, contributing to the UK Government's clean power targets, energy security and journey to net zero. The Proposed Development will also deliver economic benefits both locally and in the wider region during construction and operation. The benefits of the Proposed Development have been summarised in Section 6 of this Planning Statement. In short, these benefits demonstrate 'clear and convincing justification' for the minor adverse effects that are predicted, as allowed for by Policy ENV3.

3.3.17 The biodiversity enhancement proposed also provide positive benefits for the environment in the public interest, which would not be delivered without the Proposed Development.

3.3.18 Overall, the public benefits are considered to offset the less than substantial harm on the heritage assets referred in accordance with ENV 3 and national policy, which is discussed at Section 4.2 onwards of this Planning Statement.

3.3.19 The Proposed Development is deemed to be in accordance with Policy ENV3 of the ERLP SD.

Policy ENV4: International, National and Local Sites of importance for biodiversity

3.3.20 As noted above, no significant adverse effects are predicted for international, national and local sites of importance for biodiversity.

3.3.21 The potential connectivity of each of the internationally important sites to the site has been considered and no qualifying features of any SPA/SAC/Ramsar site were identified that could be ecologically linked to the Proposed Development.

3.3.22 The Proposed Development is deemed to be in accordance with Policy ENV4 of the ERLP SD.

Policy ENV5: Enhancing biodiversity and geodiversity

3.3.23 The Proposed Development has been designed to conserve, restore, enhance and recreate biodiversity and geological interests. Details of how this will be achieved are set out in the oLBMEP. The aims of the oLBMEP during the operation period of the Proposed Development are as follows:

- To manage the restored/enhanced habitat to ensure that they continue to deliver a net biodiversity gain through the lifetime of the Proposed Development.
- To provide ongoing management for these habitats to be able to accommodate key species.
- To monitor the habitat to ensure that the LBMEP objectives are being met, or if not, then to inform any management changes that are necessary to achieve them.

3.3.24 In terms of Biodiversity Net Gain ('BNG') specifically, the Proposed Development will deliver BNG through habitat enhancement measures, in line with the Environment Act 2021.

3.3.25 The ES explains at Chapter 7, that a 10.5% habitat biodiversity net gain will be achieved through the following measures:

- Restoring most of the arable farmland affected by the temporary construction works to arable (no net change in biodiversity units (Biodiversity Units (BU));
- Restoring 5.0 ha. of arable farmland to modified grassland (delivering 17.3 BU); and
- Creation of 0.97 ha of ponds (moderate condition, delivering 6.97 BU).

3.3.26 The total baseline biodiversity units is 43.8, and the post-development total is 48.4. The habitat unit gain is 10.5%, exceeding the 10% requirement.

3.3.27 In addition, an 11.1% hedgerow biodiversity net gain will be achieved through the planting of 477 m of species-rich native hedgerow (moderate condition, delivering 3.19 BU). This will include 414.3m of new, and 62.7m of restored native species rich hedgerow.

3.3.28 The Proposed Development is considered to be in accordance with Policy ENV5 of the ERLP SD.

Policy ENV6: Managing environmental hazards (includes flood risk).

3.3.29 The policy relates to managing environmental hazards including flood risk, pollution, and air quality. Each of these matters is addressed under policy EC5 above and is not repeated. As part of standard best practice and mitigation, these matters can be managed through the implementation of a CEMP. In relation to coastal change, the Proposed Development is not located within a coastal location and as such this aspect of the policy is not relevant.

3.3.30 The Proposed Development is considered to accord with Policy ENV6.

3.4 Development Plan Conclusions

3.4.1 The Proposed Development has been assessed against the relevant policies of the ERLP SD. The Proposed Development would result in some significant adverse effects on the character of the Yorkshire Wolds local landscape designation. This results in some minor non accordance with Policy ENV2 in terms of the adverse effects predicted on landscape character. However, it is noted that these effects would be limited in extent, out to approximately 5 km to the northwest and west of the Site and would not impact the historic and special character, appearance or conservation value of the ILA overall.

3.4.2 Overall, the limited significant adverse effects, and the general accordance with all other policies of the Development Plan, indicates that overall the Proposed Development would accord with the ERLP SD when read as a whole.

4. National Planning and Energy Policy

4.1 Introduction

4.1.1 Having assessed the Proposed Development against the adopted Development Plan, it is necessary to consider whether there are any material considerations that determine a decision should be made contrary to the Development Plan or are there relevant material matters which may support the position that the Proposed Development should be approved.

4.1.2 The following national policy documents are deemed relevant to the consideration of the Proposed Development:

- National Planning Policy Framework;
- Draft National Planning Policy Framework;
- Planning Practice Guidance; and
- National Policy Statements for Energy (EN-1 & EN-3).

4.2 National Planning Policy Framework

4.2.1 The NPPF sets out the Government's planning policies for England and how they should be applied.

4.2.2 Sustainable development, described in paragraphs 7 and 8 of the NPPF, has three main objectives (social, economic, and environmental) in order to meet the need of today's society without compromising the ability of future generations to do the same. Sustainable development is to be positively promoted in the planning framework through 'the presumption in favour of sustainable development' set out in paragraphs 10 and 11. This overarching principle contained in the NPPF is reflected in policies S1 and S2 of the ERLP SD, as set out in Section 3 of this Planning Statement.

4.2.3 Section 8 of the NPPF seeks to promote healthy and safe communities. Paragraph 105 states that planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users. Two restricted byways follow a north-south orientation through the Site. The restricted byway north of the upgraded access junction on site would be upgraded to provide a minimum carriage width of c.4 m and will be constructed to an adoptable standard. The restricted byway would be temporarily stopped up during construction and re-opened for public access thereafter. Access to T1 and T4 would cross an adjacent publicly accessible road, Westend Farm Lane, which would be kept open but would require management during the construction phase. Alternative access routes are available in close proximity and the upgrades would benefit the wider public.

4.2.4 Appendix 8.5 (PRoW Assessment) of the ES (Volume 4) presents a review of the ERoY PRoW mapping identifying PRoWs that require users to cross the proposed construction traffic route. The assessment identifies a limited number of crossing points along the c.58km route, with no qualifying PRoW crossings in Sections 2 and 4 of the route and the remaining crossings occurring either in rural/agricultural settings or within/adjacent to smaller settlements (including Middleton on the Wolds and Driffield).

4.2.5 Overall, the relatively small number of PRoW crossings along a long strategic corridor means that effects on PRoW users during construction are expected to be limited. The Outline CTMP includes measures to manage construction vehicle movements and reduce the potential for conflict with non-motorised users, including routing controls, delivery

management and (where required) marshal/traffic management arrangements at access locations

4.2.6 Paragraph 124 explains that decisions should be made in the interest of promoting the most effective use of land, while seeking to safeguard and improve the environment and ensure safe and healthy living conditions. The Proposed Development has been designed to safeguard and improve the environment and would deliver a 10.5% BNG in relation to habitats and 11.1% in relation to hedgegrow.

4.2.7 In order to tackle climate change, paragraph 161 states that the planning system should support the transition to a low carbon future by helping to shape places that contribute to radical reductions in greenhouse gas emissions and supporting renewable and low carbon energy and associated infrastructure. The Proposed Development would make an important contribution to the transition to a low carbon future and to the UK government targets of reaching net zero.

4.2.8 Paragraph 168 states that local planning authorities faced with applications for renewable and low carbon energy developments should not require applicants to demonstrate the need for the renewable 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. Notwithstanding, the applicant has set out at Section 5 of this Planning Statement the needs case and overarching international and national targets for tackling climate change. The Proposed Development can draw support from Policy 168 of NPPF. Furthermore, the benefits of the Proposed Development are set out at Section 6 of this Planning Statement.

4.2.9 Paragraph 169 of NPPF states that *"Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas".*

4.2.10 Figure 11 Wind Energy Landscape Sensitivity Strategy of the ERLP SU is an illustration of landscape sensitivity to wind energy. It is not considered to be a blanket restriction on wind energy, nor is it a wind energy spatial strategy map, but a pointer to areas of highest landscape sensitivity to this form of development.

4.2.11 Notwithstanding, this sensitivity study which has been done on a larger scale than the assessments of landscape sensitivity presented in **Appendix 5.3 (Baseline Landscape Character Analysis) Volume 4** of the ES, it is acknowledged in the Landscape Character Assessment Update (2018) which has been prepared and includes a specific Wind Energy Development Sensitivity Study that it is important that each proposal is examined within its own specific landscape context. This has been undertaken within the landscape and visual appraisal as set out in Chapter 5 Landscape and Visual Impacts of the ES. The Proposed Development is considered to be capable of being accommodated within the host landscape which is large scale, simple, arable landscape, where the sloping topography and vegetation in the surrounding area provide a degree of screening which limits the extent of the effects on landscape character, landscape designations and visual amenity.

4.2.12 Paragraph 187 of the NPPF says that decisions should contribute and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils; recognising the intrinsic character and beauty of the countryside; and minimising impacts on and providing net gains for biodiversity. New and existing development should be prevented from contributing to, or being put at unacceptable risk from, sources of pollution or land instability. These matters have been fully addressed in Section 3 of the Planning Statement.

4.2.13 Paragraph 193 sets out that if significant harm to biodiversity through development cannot be avoided, mitigated or compensated for, planning permission should be refused and development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly

exceptional reasons. No significant adverse effects are predicted on biodiversity, and 10.5% net gain will be delivered.

4.2.14 Paragraph 202 of the NPPF explains that heritage assets should be conserved in a manner appropriate to their significance. Paragraphs 207 to 221 set out how impacts to heritage assets should be considered in decision-making, such that harm to assets should be clearly justified and only found acceptable where public benefits demonstrably outweigh that harm.

4.2.15 In terms of the impact on archaeological receptors, the assessment concludes that eight archaeological receptors have been identified where the likely effect is significant. Secondary mitigation has been identified in the form of a phased approach of archaeological investigations beginning with pre-commencement trial trench evaluation, followed by excavation and recording. Agreed as part of a WSI.

4.2.16 The assessment concludes that there would be no significant adverse effects in relation to the setting of the heritage assets considered. A slight significant effect on eight designated assets is predicted which is not considered to constitute substantial harm under NPPF.

4.2.17 Paragraph 213 states that, any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification, in accordance with NPPF paragraph 207.

4.2.18 Paragraph 215 of NPPF requires that where there is less than substantial harm to the significance of a designated heritage asset this should be weighed against public benefits.

4.2.19 The assessment concludes that there would be no likely significant effects identified from impacts on the setting of heritage assets due to the Proposed Development. The Slight significant effect on eight designated assets is not considered to constitute substantial harm under NPPF. This requires to be weighed against public benefits.

4.2.20 The Proposed Development will deliver public benefits insofar as it relates to the production of sustainable renewable energy over the 40 year lifespan of the scheme which would be exported to the grid, contributing to the UK Government's clean power targets, energy security and journey to net zero. The public benefits of the production of sustainable energy over the 40 year lifespan of the scheme, the contribution towards a reduction in environmental harm and the contribution to energy security are considered to offset this harm.

4.2.21 While it is acknowledged that BNG is a statutory requirement in its own right, the biodiversity enhancement proposed will provide positive benefits for the environment in the public interest – which would not be delivered without the Proposed Development.

4.2.22 The public benefits identified are considered to demonstrably outweigh any harm on the heritage assets referred.

4.2.23 The Proposed Development is considered to accord with the key provision of the NPPF. The Proposed Development can draw support from NPPF as a material consideration to the determination of the application. NPPF is clear that local planning authorities should give **significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future**. Accordingly, this is an important material matter in the planning balance for the Proposed Development.

4.3 Draft National Planning Policy Framework (draft NPPF)

4.3.1 The UK Government published a draft revised NPPF and other changes to the planning system in December 2025, which were subject to consultation until 10 March 2026. The updated NPPF is expected to be published in Summer 2026.

4.3.2 The changes include the proposed introduction of National Development Management Policies and consideration has been given to giving these statutory status, however this is

currently not the Government's proposed approach. The intention is that the national decision-making policies in the Framework will be material considerations in making planning decisions and should be read alongside the policies in the development plan.

4.3.3 Chapters 2 and 3 of the draft NPPF set out general procedural policies for plan-making and decision making, respectively. The subsequent chapters contain policies on thematic issues. It notes that the national decision-making policies should be read as a whole including relevant footnotes and annexes. Some policies indicate how much weight the government would expect a particular consideration to be given, including cases where it is appropriate to give substantial weight to certain benefits.

4.3.4 The draft NPPF sets out three objectives in pursuit of securing Sustainable development – these include an Economic Objective; a Social Objective and an Environmental Objective.

4.3.5 The decision making polices in chapter 2 set out policy relating to the preparation of development proposals, information requirements; policy for local authorities in determining development proposals, and policy on development viability; planning conditions and obligations and relationship with other regulatory regimes and unauthorised development and enforcement.

4.3.6 There are a range of polices within the draft NPPF that will be of relevance to the Proposed Development. The key determining policies of the draft NPPF are considered as follows:

> Policy S3: Presumption in favour of sustainable development; and

> Policy W3: Renewable and low carbon energy development and electricity network infrastructure.

4.3.7 The draft NPPF introduces **Policy S3: Presumption in favour of sustainable development**. It states that *"Decisions on development proposals should apply a presumption in favour of sustainable development."* Then providing further detail relating to situations within settlements, outside settlements and in all locations. Part c. states *"In all locations, development proposals that accord with an up-to-date development plan and also the decision-making policies in this Framework should be approved without delay."*

4.3.8 The lead policy related to the Proposed Development is under the topic heading 'Securing clean energy and water' and it states the objective of polices in the chapter are *"to support the development and operation of energy and water infrastructure in ways which align with wider development, clean power and net zero objectives (including the delivery of clean power by 2030)."* The Proposed Development would contribute to this objective.

4.3.9 **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.

2. Applicants should not be required to demonstrate the need for renewable or low carbon energy development and electricity network infrastructure. Where proposals for this form of development come forward outside areas which have been identified as suitable for them

they should be acceptable when assessed against the national decision-making policies in this Framework, taken as a whole.

3. Where development is expected to be time-limited, applications should be accompanied by proposals for decommissioning and site restoration, including details of how these measures are expected to be implemented.

4.3.10 While it is acknowledged that the draft NPPF is not yet finalised, it demonstrates a shift in the policy approach from that set out within the extant NPPF. Namely, there is an explicit direction given to decision makers that when considering proposals for renewable and low carbon energy development that substantial weight should be given to a number of factors. In the case of the Proposed Development, part a) is applicable such that substantial weight should be given in this case to the benefits of the Proposed Development in terms of its contribution to improving energy security, supporting economic development and moving to a net zero future. the Proposed Development would deliver economic benefits as set out in the supporting Economic Statement and summarised in Section 6 of this Planning Statement. The Proposed Development additionally, forms part of a larger energy park which adds to the contribution already secured under a previous planning permission.

4.3.11 The benefits of the Proposed Development have been set out within Section 6 of this Planning Statement in terms of the contribution it would make to national renewable energy targets and its socioeconomic benefits such that substantial weight can be attributed in favour of granting planning permission. The Proposed Development has secured a grid connection that would enable connection to the grid by 2030. In addition, NESO has confirmed that the project has achieved Gate 2 status, that is, the project is strategically aligned to the capacities within the Clean Power Action Plan 2030. As such the Proposed Development could contribute to the delivery of Clean Power 2030, in line with the objective of the draft NPPF.

4.3.12 Polices are also provided relating to managing and adapting to climate change, flood risk and use of sustainable urban drainage, improving the natural environment, protected landscapes; areas of particular importance for biodiversity; and a range of polices relating to heritage assets. The Development Plan policy assessment set out in Section 3 of this Planning Statement considers a range of matters covered by these polices and the assessment concluded that with the exception of some localised landscape and visual effects, there would be no significant adverse effects on the environment as a result of the Proposed Development.

4.3.13 The draft NPPF sets out the emerging national planning policy for determining planning applications in England. It is at an advanced stage following consultation and based on timescales for its publication is likely to be finalised during the determination of the planning application.

4.3.14 At the time of writing it does not form the extant policy of the UK Government, however it is considered that given its advance stage should be given considerable weight in decision making.

4.4 Planning Practice Guidance

4.4.1 Planning Practice Guidance ('PPG') supports the policies set out within the NPPF discussed above. The guidance covers a range of topics including climate change, renewable and low carbon energy, environmental impact assessment, flood risk, historic environment, light pollution, minerals, natural environment, noise, transport and waste. These matters have been considered where relevant in the ES and are accounted for accordingly in this Planning Statement.

4.4.2 Of specific relevance to the Proposed Development is PPG Renewable and Low Carbon Energy (2023) which provides guidance to help Councils in developing policies for renewable

and low carbon energy and identifies planning considerations which are relevant to the consideration of renewable energy projects, including specifically onshore wind.

4.5 National Policy Statements for Energy

4.5.1 The UK Government has published a series of National Policy Statements ('NPS') relating to the delivery of Nationally Significant Infrastructure Projects (NSIPs). While they specifically relate to large scale NSIP projects, it is noted at paragraph 1.2.1 of NPS 1 that *"In England, this NPS, in combination with any relevant technology specific NPSs, may be a material consideration in decision making on applications that fall under the Town and Country Planning Act 1990 (as amended)."* Paragraph 1.2.2 continues that whether the policies in the NPS are material, and to what extent, will be judged on a case-by-case basis and will depend upon the extent to which the matters are already covered by applicable planning policy.

4.5.2 The two NPS documents of most relevance to the Proposed development are as follows:

- Overarching National Policy Statement (EN-1): EN-1 sets out the needs case for certain energy infrastructure and general assessment principles.
- National Policy Statement for renewable energy infrastructure (EN-3): provides specific details with respect to a number of different renewable technologies including onshore wind.

4.5.3 Both documents were updated in December 2025 and came into force on 6th January 2026. They therefore represent the UK Governments most recent policy position on energy development and specifically onshore wind.

Overarching NPS for Energy (EN-1)

4.5.4 NPS EN-1 explains the urgent need for significant amounts of large-scale energy infrastructure to meet government's energy objectives – while specifically referring to NSIPs, it is considered that as per the draft NPPF smaller scale projects also have a role to play in reaching the 2030 targets and beyond.

4.5.5 The NPS EN-1 sets out the general policies for the submission and assessment of energy infrastructure applications and outlines the generic impacts which arise from the development of all types of energy infrastructure covered by the energy NPSs.

4.5.6 Chapter 2 deals with the 'Government policy on energy and energy infrastructure'. At Paragraph 2.1.2 it states that *"To produce the energy required for the UK and ensure it can be transported to where it is needed, a significant amount of infrastructure is needed at both local and national scale. High quality infrastructure is crucial for economic growth, boosting productivity and competitiveness."*

4.5.7 The NPS goes on to discuss the Clean Power 2030 and net zero targets by 2050. These matters are dealt with in detail within Section 5 of this Planning Statement and as such is not repeated here, but to state that the Proposed Development could contribute to each of these targets.

4.5.8 Chapter 3 of the NPS highlights the important role of wind generation in the energy mix. It notes that it is, along with solar, the lowest cost way of generating electricity, helping reduce costs and providing a clean and secure source of electricity supply (as these sources are not reliant on fuel for generation). The analysis shows that *"a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar"* (Paragraph 3.3.23).

4.5.9 The need for electricity generating capacity is set out at paragraph 3.3.57 onwards. At Paragraph 3.3.59 it states that

"All the generating technologies mentioned above (including onshore wind) are urgently needed to meet the government's energy objectives by:

- *providing security of supply (by reducing reliance on imported oil and gas, avoiding concentration risk and not relying on one fuel or generation type)*
- *providing an affordable, reliable system (through the deployment of technologies with complementary characteristics)*
- *ensuring the system is net zero consistent (by remaining in line with our carbon budgets and maintaining the options required to deliver for a wide range of demand, decarbonisation and technology scenarios, including where there are difficulties with delivering any technology)"*

4.5.10 The NPS notes that the need for onshore wind, amongst other technologies, is established by NPS EN1 and a combination of technologies is urgently required for the Clean Power 2030 Mission, energy security, and Net Zero. The NPS introduces the term critical national priority (CNP). The Government has concluded that there is a *"critical national priority (CNP) for the provision of nationally significant low carbon infrastructure"*. (Paragraph 3.3.62 & 4.2.16) Low carbon infrastructure for the purposes of CNP for electricity generation includes all onshore generation including onshore wind.

4.5.11 In relation to CNP projects, the NPS states at paragraph 3.3.63:

"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."

4.5.12 Notwithstanding, that the Proposed Development is not defined as 'nationally significant infrastructure' given its scale, it is nevertheless important to highlight the importance being placed on the delivery of low carbon infrastructure including onshore wind amongst other technologies.

4.5.13 The remainder of the NPS, Chapter 4 and 5, deals with topic-specific 'assessment principles' and 'generic impacts' relating to how NSIP applications should be prepared. These are in relation to matters relating to EIAs. While it refers to NSIP applications, the matters are generic matters which would be considered for smaller scale onshore wind projects, and have been assessed within the ES.

4.5.14 Of note in terms of specific guidance set out in relation to how matters in relation to landscape and visual matters should be assessed it notes at paragraph 5.10.12 that *"Outside nationally designated areas, there are landscapes that may be highly valued locally. Where a local development document in England has policies based on landscape or waterscape character assessment, these should be paid particular attention. However, locally valued landscapes should not be used in themselves to refuse consent, as this may unduly restrict acceptable development."*

4.5.15 Landscape and visual matters in relation to onshore wind are dealt with in more detail within NPS EN3, discussed below.

NPS for Renewable Energy Infrastructure (EN-3)

4.5.16 The opening paragraphs of NPS EN3 reiterate that there is an urgent need for new electricity generating capacity to meet the UK's energy objectives, which are essential elements of the transition to Clean Power 2030, net zero and meeting the statutory requirements of the sixth carbon budget.

4.5.17 This is set against a backdrop that demand for electricity is likely to increase significantly over the coming years and could more than double by 2050, which could require a fourfold increase in low carbon electricity generation, with most of this likely to come from renewables.

4.5.18 Section 2.12 of the document sets out policy specific to onshore wind, directing the approach to assessment and consideration of impacts which are additional to those detailed in NPS EN-1.

4.5.19 Section 2.12 covers advice on the following matters: 'Applicant Assessment'; 'Mitigations'; and 'Secretary of State decision making', and within each, sets out advice for each of the relevant environmental topics.

4.5.20 In relation to 'Applicants Assessment', advice is provided relating to: factors influencing site selection such as predicted wind speed; network connection; proximity of site to dwellings; accessibility; and public rights of way. Applicants should also consider technical considerations such as site layout design, and appearance; project lifetime; decommissioning; flexibility in the project details; micro-siting; repowering; and future monitoring.

4.5.21 Advice is provided to applicants on the 'Impacts' in relation to a number of environmental topics, following by associated 'Mitigations' to be considered and advice on the 'Secretary of State Decision Making' in relation to the topics considered.

4.5.22 In relation to landscape and visual impacts, it is interesting to note what is set out in terms of the decision making (albeit by the Secretary of State in relation to NSIP applications). At Paragraph 2.12.159 it states that in considering landscape and visual impacts the SoS should recognise that *"modern onshore wind turbines used in commercial wind farms are large, moving structures, and such impacts are to be expected from their construction and operation. While some significant impacts on the local area are to be expected, the arrangement of wind turbines should be carefully designed within a site to minimise effects insofar as practically possible on the landscape and visual amenity while meeting technical, ecological and operational siting requirements and other constraints.*

Where the main impacts are localised and/or appropriate design mitigation has been applied, noting some wider visual impacts are also likely to be expected, the SoS should consider these as acceptable. Whether impacts are localised will need to be considered on a case-by-case basis depending on the individual circumstances of the project, location and nature of the impacts. Considerations of whether the main impacts are localised will likely include the geographic or spatial extent of the impacts and the importance of the receptor."

4.5.23 In relation to the Proposed Development, it is noted that the significant adverse effects predicted would not result in significant adverse effect on any nationally designated landscapes. Significant adverse effects are predicted in terms of landscape character and visual amenity, however, as explained in Section 3 and based on the conclusions within the LVIA, are considered to be localised as they are limited in extent and do not affect nationally significant landscapes.

4.6 Conclusions on National Policy

4.6.1 The Proposed Development can draw support from the national policy documents considered above. In particular, the UK Government's most up to date policy position which is supportive of the development of onshore wind in England. It is recognised that onshore wind farms may result in significant landscape and visual effects, but that these impacts are likely to be acceptable when they are localised.

4.6.2 The Proposed Development can draw significant and substantial support from the national policy documents considered.

5. Renewable Energy Legislation and Policy

5.1 Introduction

5.1.1 This section of the Planning Statement considers the key climate change, emission reduction and renewable energy legislation and policy which sets the broader framework and needs case for the delivery of new renewable energy, and specifically onshore wind, in England.

5.1.2 This Section refers to the renewable energy policy and emissions reduction legislative framework with reference to relevant international and UK provisions. The framework of international agreements, legally binding targets and climate change global advisory reports is the foundation upon which national energy policy and emissions reduction law is based. This underpins what can be termed the need case for renewable energy from which the Proposed Development can draw a high level of support.

5.1.3 Relevant Government policy is a material consideration. It is not necessary for new Government policy, where relevant, to find explicit expression in national planning policy for it to be or become a material consideration. The weight given to any policy, subject to taking a reasonable and rational approach, is a planning judgement and a matter for the decision maker.

5.1.4 The Proposed Development must therefore be considered against a background of material UK energy and climate policy and legislative provisions, as well as national planning policy and advice.

5.1.5 It is evident that there is clear and consistent policy support from the UK Government for the deployment of renewable energy generally (including onshore wind) to combat the climate crisis, diversify the mix of energy sources, achieve greater security of supply, and to attain legally binding emissions reduction targets.

5.1.6 Government renewable energy policy and associated renewable energy and electricity targets are important considerations. It is important to be clear on the current position as it is a fast-moving topic of public policy.

5.1.7 The following are the key documents of relevance:

- The Climate Change Act 2008;
- Sixth & Seventh Carbon Budget;
- The UK Energy White Paper (December 2020);
- Advice from Climate Change Committee (various reports);
- British Energy Security Strategy (2022);
- UK Government: Clean Power 2030 Action Plan (2024); and
- The Onshore Wind Taskforce Strategy (July, 2025).

5.2 International Commitments

The Paris Agreement (2015)

5.2.1 In December 2015, 195 countries adopted the first ever universal, legally binding global climate deal at the Paris Climate Conference ('COP21'). The Paris Agreement within the United Nations ('UN') Framework Convention on Climate Change sets out a global action plan towards climate neutrality with the aims of stopping the increase in global average temperature to well below 2°C above pre-industrial levels, and to pursue efforts to limit global warming to 1.5ºC.

5.2.2 Moving to a low carbon economy is a globally shared goal and will require absolute emission reduction targets. The UK Government's commitment under the Paris Agreement links through to the Climate Change Committee's ('CCC') advice to both UK Government on net zero targets which have now been translated into new legislative provisions and targets leading to net zero by 2050. This is referred to below in more detail.

5.2.3 The Paris Agreement does not itself represent Government policy in the UK or England. However, the purpose of domestic and renewable energy and greenhouse gas ('GHG') reduction targets is to meet the UK's commitment in the Paris Agreement.

United Nations - Intergovernmental Panel on Climate Change

5.2.4 The Intergovernmental Panel on Climate Change ('IPCC') is the United Nations Body for assessing the science related to climate change.

5.2.5 The IPCC prepares comprehensive assessment reports about the state of scientific, technical and socio-economic knowledge on climate change, its impacts and future risks and options for reducing the rate at which climate change is taking place. IPCC reports are commissioned by the world's Governments and are an agreed basis for COP negotiations.

5.2.6 The IPCC's Special Report on Warming of 1.5ºC, published in 2018, was a key piece of evidence for the CCC's recommendation to the UK Government for a 2050 net zero greenhouse gas emission target. The IPCC's reports since 2018 have provided an up-to-date estimate of how close global temperatures are to 1.5ºC of warming above pre-industrial levels and the remaining volume of global cumulative carbon dioxide that could be emitted to be consistent with keeping global warming below any particular threshold (such as the 1.5ºC and 2ºC levels referred to in the Paris Agreement).

5.2.7 The IPCC's 6th Assessment Report was published in March 2023. The Summary for Policymakers Report (page 10) states that it is likely that warming will exceed 1.5ºC during the 21st century and make it harder to limit warming to 2ºC. It states (page 12):

"Continued greenhouse gas emissions will lead to increasing global warming, with the best estimate of reaching 1.5°C in the near term in considered scenarios and modelled pathways. Every increment of global warming will intensify multiple and concurrent hazards (high confidence). Deep, rapid and sustained reductions in greenhouse gas emissions would lead to a discernible slowdown in global warming within around two decades, and also to discernible changes in atmospheric composition within a few years (high confidence)".

5.2.8 Page 24 of the report states *"There is a rapidly closing window of opportunity to secure a liveable and sustainable future for all (very high confidence)".*

COP 28, Dubai 2023

5.2.9 The UN Climate Change Conference ('COP28') closed on 13 December 2023. The UN press release of the same date states that the agreement reached *"Signals the 'beginning of the end' of the fossil fuel era by laying the ground for swift, just and equitable transition, underpinned by deep emissions cuts and scaled up finance."*

5.2.10 The statement adds:

"The stocktake recognises the science that indicates global greenhouse gas emissions need to be cut 43% by 2030, compared to 2019 levels, to limit global warming to 1.5°C. But it notes parties are off track when it comes to meeting their Paris Agreement goals.

The stocktake calls on parties to take actions towards achieving, at a global scale, a tripling of renewable energy capacity and doubling of energy efficiency improvements by 2030. The list also includes accelerating efforts towards the phase down of unabated coal power, phasing out inefficient fossil fuel subsidies, and other measures that drive the transition away from fossil fuels in energy systems, in a just, orderly and equitable manner, with developed countries continuing to take the lead." (Emphasis added)

COP 29, Baku 2024

5.2.11 The 29th UN Climate Conference hosted in Baku, Azerbaijan concluded on 24 November 2024. New financial goals agreed at COP 29 aimed at building on the significant strides on global action at COP 27, which agreed a historic Loss and Damage Fund, and COP 28, which delivered a global agreement to transition away from fossil fuels in energy systems in a swift and fair manner as well as triple renewable energy and boost climate resilience.

5.2.12 The Climate Change Committee in its summation[3] of the conference and finance agreement reached, noted that the new climate finance goal of at least $300 billion per year from the developed world by 2035 was a compromise outcome, with some developing countries expressing frustration and disappointment. There was recognition of the much greater scale of overall finance needed, marking a shift to formally recognising the wider mobilisation required, which will only be achieved if climate change investment is mainstreamed into wider public and private finance flows.

5.2.13 Unlike COP 27 and 28 however, COP 29 reached an agreement on carbon markets which will help countries deliver their respective climate plans on a quicker and cheaper basis, as well as make faster progress in halving global emissions.

COP 30, Belém 2025

5.2.14 COP30 was the 2025 UN Climate Conference, held in Belém, Brazil from 10th – 21st November 2025. The conference focused on implementing past agreements and key outcomes included a new "global mutirão" decision for collective action and a call to triple adaptation finance by 2035.

5.2.15 Despite support from over 80 countries (including the UK) for a "roadmap" toward phasing out fossil fuels, oil-producing nations voted against this being included from the formal deal and therefore no new "roadmaps" for phasing out fossil fuels were agreed upon. However, Colombia and the Netherlands will co-host the first International Conference on the Just Transition Away from Fossil Fuels in April 2026 in Santa Marta, Colombia. This initiative aims to build on the momentum from COP30 to create a roadmap for phasing out fossil fuels and to move this discussion outside of the formal UN COP negotiations.

UN Emissions Gap Report (2025)

5.2.16 The UN Emissions Gap Report (November 2025) entitled "Off Target" provides the annual independent science-based assessment of the gap between the pledged GHG reductions, and the reductions required to align with the long-term temperature goal of the Paris Agreement.

[3] Climate Change Committee (2024) COP29: Key outcomes and next steps for the UK Available at: https://www.theccc.org.uk/publication/cop29-key-outcomes-and-next-steps-for-the-uk/ accessed 17 February 2026.

5.2.17 The Executive Summary Report comments on the background of GHG emission increases and the new Nationally Determined Contributions ('NDCs') submitted ahead of COP30 in Brazil as follows (page 4):

"*As this sixteenth Emissions Gap Report shows, the new NDCs have limited effect on narrowing the emissions gap by 2030 and 2035, leaving global warming projections well above the Paris Agreement's temperature goal. New scenarios show that limiting warming to 1.5°C by 2100 remains technically possible. However, due to the continued delay in deep emission cuts, 1.5°C pathways now imply higher and higher temporary exceedance of this temperature target. The magnitude and duration of this overshoot must be limited as much as possible. Each year of delayed action locks in carbon intensive infrastructure results in greater losses for people and ecosystems, higher adaptation costs and a heavier reliance of costly and uncertain carbon dioxide removal. Each year of inaction makes the path to net zero by 2050 and net negative emissions thereafter steeper, more expensive and more disruptive*."

5.2.18 Section 7 of the Executive Summary sets out that "despite the increasing likelihood of higher and longer temperature overshoot, pursuing efforts to limit global warming to 1.5°C remains as critical and relevant as ever".

5.2.19 The report adds: "*accelerated mitigation action provides benefits and opportunities. In many cases, mitigation aligns with economic growth, job creation, energy security and achievement of other pressing development needs and the sustainable development goals. The required technologies are available, and wind and solar energy development continue to exceed expectations, lowering deployment costs and driving market expansion. Yet deployment remains insufficient, and accelerated emission reductions require overcoming policy, governance, institutional and technical barriers*….."

5.2.20 The latest Gap Report is expressly clear that the international position in relation to combating climate change is worsening. The conclusions also make clear that deployment of renewable energy, including wind energy, remains key to combating the climate emergency.

5.3 UK Climate Change and Energy – Legislation and Policy

The Climate Emergency

5.3.1 A critical part of the response to the challenge of climate change was the climate emergency which was declared by the UK Parliament in May 2019. The declaration of climate emergency needs to be viewed in the context in which it was declared (advice from the CCC) and in response to commitments under the Paris Agreement and what followed from it as a result of the declaration (new net zero targets set out in legislation).

The Climate Change Act 2008 and Carbon Budgets

5.3.2 The Climate Change Act 2008 (the 2008 Act) provides a system of carbon budgeting. Under the 2008 Act, the UK committed to a net reduction in GHG emissions by 2050 of 80% against the 1990 baseline. In June 2019, legislation was passed that extended that target to at least 100% against the 1990 baseline by 2050.

5.3.3 The 2008 Act also established the CCC which advises the UK Government on emissions targets, and reports to Parliament on progress made in reducing GHG emissions.

5.3.4 The CCC has produced seven, four yearly carbon budgets, covering 2008 to 2042. These carbon budgets represent a progressive limitation on the total quantity of GHG emissions to be emitted over the five-year period as summarised in **Table 5.1** below. Essentially, they are five yearly caps on greenhouse gas emissions measured in million tonnes of carbon dioxide equivalent (MtCO2e).

5.3.5 These legally binding 'carbon budgets' act as stepping-stones toward the 2050 target. The CCC advises on the appropriate level of each carbon budget and once accepted by Government, the respective budgets are legislated by Parliament.

Table 5.1: Carbon Budgets and Progress[4]

Budget	Carbon budget level	Target Reduction below 1990 levels	Progress on Budgetary Period (reduction amount v Target)
1st carbon budget (2008 – 2012)	3,018 $MtCO_2e$	26%	-27%
2nd carbon budget (2013 – 2017)	2,782 $MtCO_2e$	32%	-42%
3rd carbon budget (2018 – 2022)	2,544 $MtCO_2e$	38% by 2020	-50%[5]
4th carbon budget (2023 – 2027)	1,950 $MtCO_2e$	52% by 2025	n/a
5th carbon budget (2028 – 2032)	1,725 $MtCO_2e$	57% by 2030	n/a
6th carbon budget (2033 – 2037)	965 $MtCO_2e$	78% by 2035	n/a
7th carbon budget (2038 – 2042)	535 $MtCO_2e$	87% by 2042	n/a
Net Zero Target	**100%**	**By 2050**	

5.3.6 The Sixth Carbon Budget[6] ('CB6') requires a reduction in UK greenhouse gas emissions of 78% by 2035 relative to 1990 levels. This is seen as a world leading commitment, placing the UK *"decisively on the path to Net Zero by 2050 at the latest, with a trajectory that is consistent with the Paris Agreement"* (CB6, page 13).

5.3.7 Key points from CB6 include:

> The CCC is clear in setting out that new demand for electricity will mean that electricity demand will rise 50% to 2035 and doubling or even trebling by 2050.

> CB6 needs to be met and that will need more and faster deployment of renewable energy developments than has happened in the past.

> The related 'Methodology Report'[7] from the CCC advice, states that in all scenarios for the carbon budget and looking ahead to 2050, the CCC sees new onshore wind generation being deployed by 2050. They set out that their modelling reflects this by almost doubling onshore wind capacity to 20 to 30 GW in all scenarios by 2050.

5.3.8 Following the CB6, the UK Government announced on 20 April 2021 that it would set the world's most ambitious climate change target into law (by the Carbon Budget Order 2021[8]

[4] Source: Climate Change Committee (CCC).

[5] Confirmed by CCC in 'Final Statement for the Third Carbon Budget' May 2024. By the end of the period in 2022, UK net GHG emissions were 50% lower than the base year emissions.

[6] Climate Change Committee (2020) The Sixth Carbon Budget The UK's path to Net Zero Available at: https://www.theccc.org.uk/wp-content/uploads/2020/12/The-Sixth-Carbon-Budget-The-UKs-path-to-Net-Zero.pdf

[7] CCC (2020) The Sixth Carbon Budget Methodology Report Available at: https://www.theccc.org.uk/wp-content/uploads/2020/12/The-Sixth-Carbon-Budget-Methodology-Report.pdf

[8] UK Government (2021) The Carbon Budget Order 2021 Available at: https://www.legislation.gov.uk/uksi/2021/750/introduction/made

(the Order)) to reduce emissions by 78% by 2035 compared to 1990 levels. This effectively brought forward the UK's previous commitment of an 80% reduction by 2050 by 15 years.

5.3.9 The Seventh Carbon Budget[9] ('CB7') was published by the CCC in February 2025. The CCC's recommended level for CB7, namely a limit on the UK's GHG emissions over the five-year period 2038 to 2042, is 535 MtCO2e including emissions from international aviation and shipping.

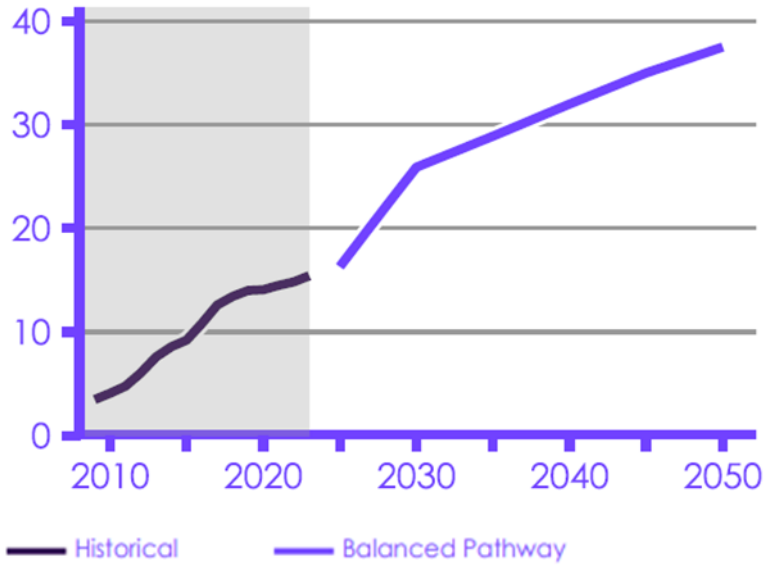
5.3.10 Page 12 of the CB7 states:

"By the middle of the Seventh Carbon Budget on our pathway, emissions in the UK will be only a quarter of the level they are today, and 80% lower than levels in 1990 (90% lower excluding emissions from international aviation and shipping.) Achieving this will require a significant reduction in emissions across sectors including surface transport, buildings, industry and agriculture."

5.3.11 It sets out (page 12) that achieving CB7 will mean that UK based renewable energy provides the bulk of generation and this will replace oil and gas across most of the economy. It adds that "this requires twice as much electricity as today by 2040".

5.3.12 It further states that low carbon supply by 2040 will see offshore wind grow sixfold from 15 GW of capacity in 2023 to 88 GW by 2040. It adds that *"onshore wind capacity doubles to 32 GW by 2040 and solar capacity increases to 82 GW"* (page 13). The anticipated growth of onshore wind capacity is shown in the Report (page 109) and illustrated in **Figure 5.1** below.

Figure 5.1: Onshore Wind Operational Capacity (GW) in CCC 'Balanced Pathway'



5.3.13 In relation to the increase in onshore wind capacity, CB7 sets out (page 106) that "*this will require recent annual installation rates to treble this decade, requiring installation rates comparable to the annual rollout rates previously sustained during the mid 2010s*".

5.3.14 The 'Balanced Pathway' requires an average deployment rate of 0.8 GW per year, with deployment peaking at 1.9 GW in 2030, which is comparable to the historical peak of 1.8 GW in 2017.

[9] CCC (2025) The Seventh Carbon Budget Advice for the UK Government Available at https://www.theccc.org.uk/wp-content/uploads/2025/02/The-Seventh-Carbon-Budget.pdf

5.3.15 CB7 states that *"there are a range of barriers that will need to be overcome to enable the levels of deployment required. This will require concerted action on several areas, including planning, grid connections, and supply chain bottlenecks."*

The UK Energy White Paper (December 2020)

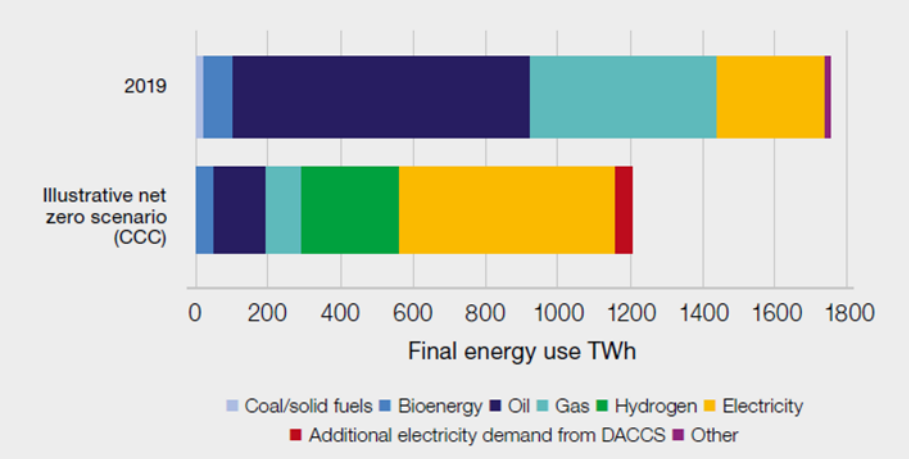
5.3.16 The Energy White Paper 'Powering our Net Zero Future'[10] was published on 14 December 2020, and while more than five years old, represents an important step in UK energy policy highlighting the importance of renewable electricity.

5.3.17 The White Paper set out that "electricity is a key enabler for the transition away from fossil fuels and decarbonising the economy cost-effectively by 2050". A key objective was set out to "accelerate the deployment of clean electricity generation through the 2020s" (page 38).

5.3.18 Electricity demand was forecast to double out to 2050, which will "require a four-fold increase in clean electricity generation with the decarbonisation of electricity increasingly underpinning the delivery of our Net Zero target" (page 42).

5.3.19 This anticipated growth of renewable electricity set out in the White Paper is illustrated in the graph below – **Figure 5.2.**

Figure 5.2: Illustrative UK Final Energy Use in 2050[11]



5.3.20 Figure 5.2 illustrates that a reduction in energy usage is predicted in the net zero scenario. The majority of the energy used in 2050 will be generated from electricity. The White Paper notes at page 10 that clean electricity will become the predominant form of energy, entailing a potential doubling of electricity demand and consequently a fourfold increase in low-carbon electricity generation, which will be required to reach net zero emissions.

5.3.21 Whilst offshore renewables are expected to grow significantly, the White Paper also sets out that *"onshore wind and solar will be key building blocks of the future generation mix, along with offshore wind. We will need sustained growth in the capacity of these sectors in the next decade to ensure that we are on a pathway that allows us to meet Net Zero emissions in all demand scenarios"* (page 45) (underlining added).

The British Energy Security Strategy (April 2022)

5.3.22 The British Energy Security Strategy[12] ("the Strategy") was published by the UK Government on 7 April 2022. The Strategy focuses on energy supply and states that in the future nuclear

[10] UK Government (2020) Energy white paper: Powering our net zero future Available at: https://www.gov.uk/government/publications/energy-white-paper-powering-our-net-zero-future
[11] Source: Energy White Paper page 9 (2020).
[12] UK Government (2023) The UK Battery Strategy Available at: https://www.gov.uk/government/publications/uk-battery-strategy

will have an expanded role and that renewables have an important role: the foreword states inter alia:

"Accelerating the transition away from oil and gas then depends critically on how quickly we can roll out new renewables….

The growing proportion of our electricity coming from renewables reduces our exposure to volatile fossil fuel markets."

5.3.23 Reducing the wider UK's dependency on hydrocarbons has important security of supply, electricity cost and fuel poverty avoidance benefits. Those actions already urgently required in the fight against climate change are now required more urgently for global political stability and insulation against dependencies on rogue nation states.

Climate Change Committee Report to UK Parliament (2024)

5.3.24 The CCC published the report 'Progress in Reducing Emissions 2024 Report to Parliament' in July 2024[13] (the 'CCC 2024 Report'). The Executive Summary (page 8) states:

"The previous Government signalled the slowing of pace and reversed or delayed key policies. The new Government will have to act fast to hit the country's commitments.

The cost of key low-carbon technologies is falling, creating an opportunity for the UK to boost investment, reclaim global climate leadership and enhance energy security by accelerating take-up. British-based renewable energy is the cheapest and fastest way to reduce vulnerability to volatile global fossil fuel markets. The faster we get off fossil fuels, the more secure we become."

5.3.25 The CCC 2024 Report makes it clear that urgent action is needed to get on track for the UK's 2030 emissions reduction target. In this regard it states:

"The UK has committed to reduce emissions in 2030 by 68% compared to 1990 levels, as its Nationally Determined Contribution (NDC) to the Paris Agreement. It is the first UK target set in line with Net Zero. Now only six years away, the country is not on track to hit this target despite a significant reduction in emissions in 2023. Much of the progress to date has come from phasing out coal generated electricity, with the last coal-fired power station closing later this year. We now need to rapidly reduce oil and gas use as well.

Our assessment is that only a third of the emissions reductions required to achieve the 2030 target are currently covered by credible plans. Action is needed across all sectors of the economy, with low carbon technologies becoming the norm."

5.3.26 The CCC 2024 Report explains that the UK should now be in a phase of rapid investment and delivery, however note that all indicators for low carbon technology roll out are *"off track, with rates needing to significant ramp up."* In this regard in terms of renewable technologies it states onshore wind installations will need to double.

5.3.27 Chapter 2 of the CCC 2024 Report confirms that the third Carbon Budget was met (covering the period 2018 to 2022), however *"future carbon budgets will require an increase in the pace and breadth of decarbonisation. It is imperative that an ambitious path of emissions reduction is maintained towards Net Zero."* (Page 33).

5.3.28 Section 2.3 of the CCC 2024 Report addresses emissions reductions required for future Carbon Budgets. Paragraph 2.3.1 states that:

"emissions reductions across most sectors will need to significantly speed up to be on track to meet the UK's climate targets in the 2030s, and therefore the long term target of Net Zero by 2050. Emissions reductions will need to outperform the legislated Fourth Carbon Budget

[13] https://www.theccc.org.uk/wp-content/uploads/2024/07/Progress-in-reducing-emissions-2024-Report-to-Parliament-Web.pdf

for the UK to be on a sensible path to achieve its 2030 NDC, the Sixth Carbon Budget and Net Zero."

5.3.29 Chapter 3 of the CCC 2024 Report examines indicators of current delivery progress and it sets out (page 50) a number of key points including inter alia:

"Required pace – substantial progress is needed on a range of key indicators over the rest of this decade, to get the UK on track to meet its 2030 emissions targets. Low carbon technologies need to quickly become the default options in many areas…

Renewable energy capacity has been growing steadily. However, roll-out rates will need to increase, compared to those since the start of this decade, to deliver the capacity needed by the end of the decade. Annual installations of offshore wind will need to more than treble, onshore wind more than double and solar increase by a factor of five."

5.3.30 Reference is made to electricity supply (page 56). With regard to onshore wind it states that only 0.5 GW of new onshore wind was installed in 2023 and *"this is considerably below the peak of 1.8 GW in 2017. Onshore wind installation rates will need to more than double compared to the average pace of deployment over the past three years."*

5.3.31 Chapter 4 of the CCC 2024 Report addresses the risks to the UK in achieving its emissions reduction targets.

5.3.32 With regard to the Fourth Carbon Budget (2023 to 2027) it states that although credible plans cover almost all of the emissions reductions required to meet it *"this budget was set before the UK's Net Zero target was legislated. The UK will need to reduce emissions by double the amount implied by the target to be on a sensible path to Net Zero…."*

5.3.33 With regard to the 2030 NDC and CB6 (for the period 2023 to 2037) the CCC Report states that credible plans cover only around a third of emissions reductions needed to meet the UK's 2030 NDC and a quarter of those needed to meet the Sixth Carbon Budget. It adds *"that 2030 NDC is now only six years away. While our assessment of the policies and plans to deliver it has improved slightly, there remains significant risks to achieving these goals."*

Climate Change Committee Report to UK Parliament (2025)

5.3.34 The CCC published the report 'Progress in adapting to climate change' Report to Parliament'[14] in April 2025 (the "CCC 2025 Report"). The CCC 2025 Report's focus is on climate adaptation and an assessment of the UK's readiness for climate change. It states that:

"The CCC 2025 Report's focus is on climate adaptation to the extreme weather already being experienced in the UK as a result of climate change. It is a reminder of the urgent ongoing need to increase energy generation from renewable sources to tackle the climate crisis."

Climate Change Committee Report to UK Parliament (June 2025)

5.3.35 The CCC published its report 'Progress in reducing emissions – 2025 Report to Parliament'[15] (the CCC 2025 Report) in June 2025. It highlights that *"greenhouse gas emissions have more than halved since 1990, with the pace of reduction having more than doubled since the introduction of the UK's Climate Change Act in 2008"* (Page 10).

5.3.36 The CCC 2025 Report acknowledges that meeting the UK's emissions targets is achievable but relies on urgent action in several critical areas identifying ten priority actions for the year 2025-2026, one of which is to:

[14] CCC (2025) Progress in adapting to climate change Available at: https://www.theccc.org.uk/wp-content/uploads/2025/04/Progress-in-adapting-to-climate-change-2025-1.pdf

[15] CCC (2025) Progress in reducing emissions – 2025 Report to Parliament' Available at: https://www.theccc.org.uk/publication/progress-in-reducing-emissions-2025-report-to-parliament/

"Effectively deliver rapid expansion of the low-carbon electricity system. An effective Allocation Round 7 will be critical to achieving this, given that projects typically take several years to come onstream." (Page 19)

5.3.37 The CCC 2025 Report highlights that renewable electricity generation expanded more in 2024 than in any of the previous six years, driven by wind and solar. However, the pace still needs to accelerate significantly to meet 2030 goals. This will require a tripling in annual installations of both offshore and onshore wind and a four-fold increase in solar compared to the average rate seen since the start of the decade.

5.3.38 Total operational capacity for onshore wind was 16 GW in 2024, and further capacity is currently contracted to bring total capacity to 20 GW by 2027. The report goes on to state in relation to reaching the 27GW 2030 target (UK) for onshore wind, which is the lower end of the Government's capacity range, *"will require more than 1.8 GW to be added each year on average, the same as the peak seen in 2017. However, only 0.8 GW of onshore wind was installed in 2024. Onshore wind installation rates will need to triple compared to the average pace of deployment since the start of the decade."* (page 60)

5.3.39 In terms of the required emissions savings to achieve the 2030 Nationally Determined Contributions ('NDC') the CCC 2025 Report highlights some risks. One of which include *"delivery risks for planning, grid connections, and successful Contracts for Difference auctions to deliver the rest of the renewables deployment required by 2030 under the Clean Power 2030 Action Plan".* (page 17)

5.3.40 Page 105 the role of low carbon electricity is highlighted further in reducing emissions. In the Committee's Seventh Carbon Budget advice, 60% of the required emissions reduction is delivered through electrification and low-carbon electricity. The CCC 2025 Report sets out at:

"Delivering this requires continued growth of renewables deployment over the coming years, to ensure a rapid scale-up in supply of low-carbon electricity.

Renewable generation from wind and solar is well established and is the cheapest form of new electricity generation capacity.

The UK also benefits from extensive wind resources.

As such, renewables have an essential role to play in achieving Net Zero and meeting the vast majority of demand in the Balanced Pathway. This will require strong and sustained deployment of renewables capacity…

These technologies need to be accompanied by rapidly expanding the transmission grid, upgrading the distribution network, and speeding up the grid connection process." (Page 105)

5.3.41 In relation to transmission and grid readiness, these are highlighted as critical enablers for renewable deployment and electrification.

5.3.42 The CCC 2025 Report notes that transmission network development is progressing, but timely delivery depends on removing barriers in planning; supply chains; and access to grid connections.

5.3.43 The CCC 2025 Report repeatedly stresses that electrification of transport, buildings, and industry depends on a rapidly expanding and decarbonised grid. Without faster grid upgrades this will result in renewable projects risk delays, electrification of heat and transport could stall, and the UK may miss its 2030 NDC.

Labour Government and Commitment to Renewables (2024)

5.3.44 The UK Government change at Westminster in 2024 and a Labour administration for the UK is of relevance in terms of the new UK Government policy approach to net zero.

5.3.45 The DESNZ issued a Policy statement on onshore wind[16] on 8th July 2024 which included references to double UK onshore wind capacity from its current level of approximately 15 GW to a planned capacity of 30 GW by 2030. The statement also removed the effectively removed the de facto ban on onshore wind in England (in place since 2015) through the amendments to the NPPF so onshore wind would be treated like any other energy development.

UK Government: Clean Power 2030 Action Plan (2024)

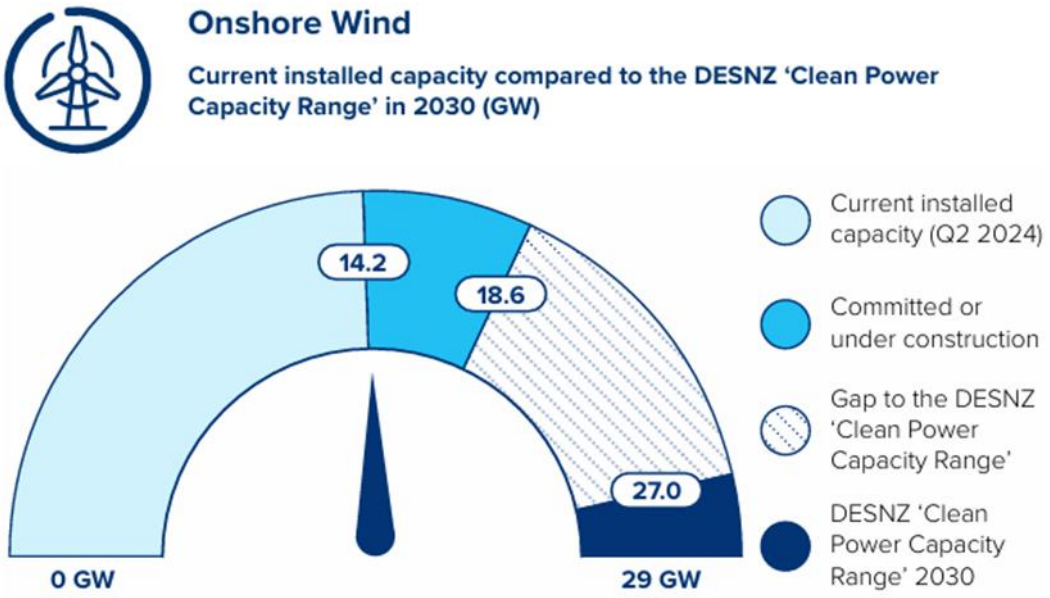
5.3.46 The Clean Power 2030 Action Plan was published by DESNZ in December 2024. It sets out (page 9) that Britain needs to install *"clean sources of power at a pace never previously achieved"*.

5.3.47 It further adds (page 10):

"Clean power by 2030 will herald a new era of clean energy independence and tackle three major challenges: the need for 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. Clean power by 2030 is a sprint towards these essential goals".

5.3.48 Within the Action Plan, it sets out that by 2030, this means that there should be 27 to 29 GW of onshore wind operational within the UK. At the time of the publication of Clean Power 2030, there was only 14.2 GW of installed onshore wind capacity in the UK, illustrated below in **Figure 5.3.**

Figure 5.3 Onshore Wind and 'Gap' to reach 2030 UK Target



[16] DESNZ (2024) Policy statement on onshore wind Accessed: https://www.gov.uk/government/publications/policy-statement-on-onshore-wind/policy-statement-on-onshore-wind

5.3.49 Renewable UK's Onshore Wind Report[17] indicates that as of September 2025 the UK had 15.8 GW of onshore wind capacity in operation.

5.3.50 The document adds that *"Meeting the clean power 2030 goal is key to accelerating to net zero, not only in eliminating emissions that currently come from electricity generation, but also via the application of clean power in the buildings, transport and industry sectors… The shift to a clean power system by 2030 forms the backbone of the transition to net zero, as we move to an economy much more reliant on electricity".*

5.3.51 There is therefore a significant gap between the target onshore wind capacity for 2030 (29 GW) compared to what is currently installed. The gap is some 13.2 GW of required new capacity. As noted above, the CCC has recommended that the UK achieve a higher figure of 32 GW of onshore wind by 2040 in its projections for the CB7.

5.3.52 The document adds that *"Meeting the clean power 2030 goal is key to accelerating to net zero, not only in eliminating emissions that currently come from electricity generation, but also via the application of clean power in the buildings, transport and industry sectors… The shift to a clean power system by 2030 forms the backbone of the transition to net zero, as we move to an economy much more reliant on electricity"*.

5.3.53 Page 74 of the Action Plan states that *"Meeting the renewable capacity set out in the DESNZ 'clean power capacity range' is achievable but will require deployment at a sharply accelerated scale and pace".*

The Onshore Wind Taskforce Strategy (July 2025)

5.3.54 The DESNZ published the Onshore Wind Taskforce Strategy[18] ('OWTS') in July 2025, which sets out over 40 actions, primarily Government commitments to resolve key blocks to onshore wind within the UK. The OWTS's overall aims are to boost onshore wind deployment and to deliver economic benefits for local communities, businesses and the consumer.

5.3.55 The Ministerial Forward by the Secretary of State for Energy Security and Net Zero states:

"As one of the cheapest and fastest to build sources of power we have, onshore wind will play a critical role in boosting our energy independence with clean power by 2030. The reality is that every turbine we build helps protect families, businesses and the public finances from future fossil fuel shocks.

That's why in our first 72 hours in office, we lifted the onshore wind band in England - in place for nine years under the previous Government. And it's why last July we established the Onshore Wind Taskforce to bring Government, industry and trade unions together to explore how we can radically accelerate deployment of this critical technology.

The Onshore Wind Taskforce strategy is the outcome of that work. It sets out more than 40 steps Government and industry will take to help deliver up to 29GW of onshore wind by 2030. That includes driving ambitious reforms to planning, grid connections, and routes to market, while building the supply chains and skilled workforce we need."

5.3.56 In addition, within the forward the statement by the Head of Clean Power 2030 within DESNZ states *inter alia*:

"Clean Power 2030 is our ambitious mission to grow rapidly Britain's clean electricity infrastructure, reducing Britain's dependency on imported oil and gas, securing key clean industries and readying the country for the expected growth in electrical demand over the next 20 years.

[17] Renewable UK (2025) Onshore wind pipeline report 2025 Available at: https://www.renewableuk.com/energypulse/reports/uk-onshore-wind-pipeline-report-2025/
[18] UK Government (2025) Onshore Wind Taskforce Strategy Available at: https://www.gov.uk/government/publications/onshore-wind-strategy

Our Clean Power Action Plan targets a near doubling of onshore wind capacity up to 29GW by 2030. That will require rapid development of new onshore wind across Britain and repowering of existing sites to bring British consumers some of the cheapest homegrown power that can be produced. We are already working with NESO to slash the queue of projects waiting to connect to the grid to accelerate the best onshore wind development.

Rapid deployment of onshore wind is our first line of defence against future gas price spikes - every megawatt added displaces imported gas in the power system. With the steps in this new strategy, we will cement the growth of an important homegrown industry. The momentum behind clean power continues to grow."

5.3.57 The various commitments and actions within the OWTS cover:

- Scoping, planning and consenting improvement for onshore wind projects;
- Networks and systems reform;
- Communities and public perception actions;
- Aviation and defence commitments to improve the interface between wind energy and civil and military radar and related matters;
- Finance and routes to market; and
- Supply chains, skills and workforce.

5.3.58 The OWTS refers to the Government's Clean Power Action Plan (discussed above), which was published in December 2024 and which set out a pathway to achieving the mission of clean power by 2030. Page 10 of the OWTS states that:

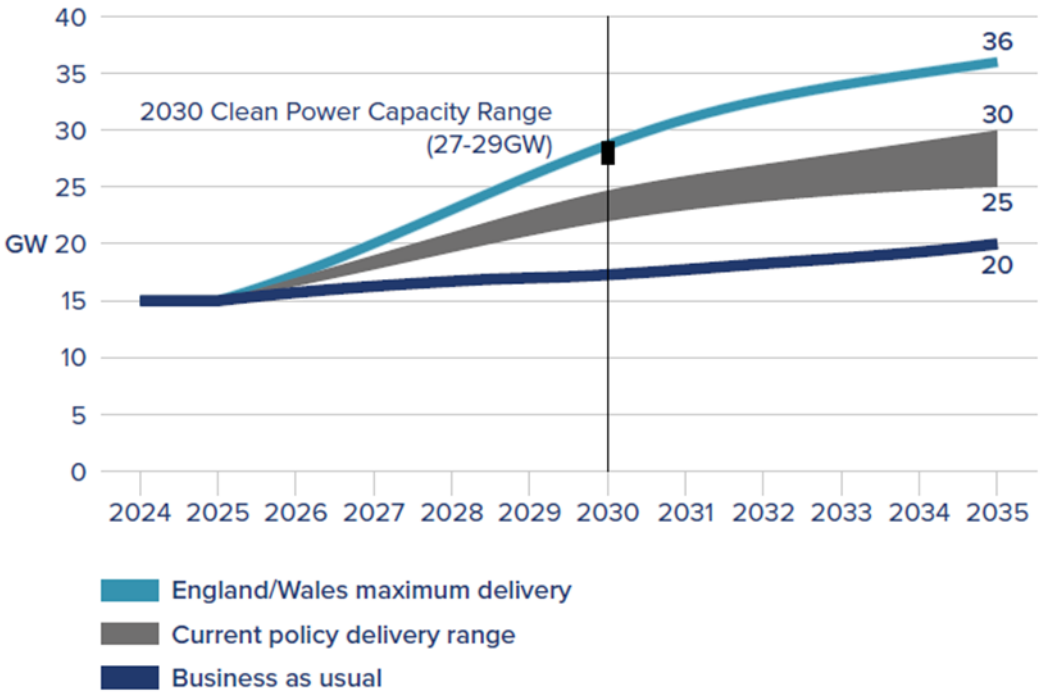
"All routes to achieving this mission are reliant on mass deployment of renewable electricity technologies, including onshore wind. The Clean Power Plan stated that to decarbonise the power sector by 2030, 27-29GW onshore wind will be needed within GB. That is a significant increase above the current installed capacity, which stands at 14.8 GW in GB (over 16GW in the UK)".

5.3.59 It is explained that the delivery of up to 29 GW of onshore wind by 2030 would involve around 10 to 12 GW more than would have been deployed under historic growth rates, **with England contributing around 2 GW by 2030.** (Emphasis added)

5.3.60 The OWTS also emphasises the significant economic opportunity that further onshore wind deployment will deliver (page 10). It states that meeting the onshore wind 2030 targets together with the actions within the OWTS, could deliver up to 45,000 direct and indirect jobs in Great Britain and result in £70 million per year of extra investment in community benefits.

5.3.61 At page 18 of the OWTS, reference is made to illustrative deployment scenarios which it states emphasises *"the challenge in meeting the 2030 clean power range in GB which will require significant deployment in Scotland, England and Wales."* This is illustrated in **Figure 5.4 below** (reproduction of Figure 5 from the Strategy).

Figure 5.4: Clean Power Deployment Scenarios (Onshore Wind)



5.3.62 The scenarios as illustrated in **Figure 2.5** include:

- Business as usual - under this scenario onshore wind only reaches in the region of 17 GW by 2030 and 20 GW by 2035.
- Current policy delivery range - this assumes *"seamless implementation"* of the reform announced as part of the Clean Power 2030 Action Plan and the action set out in the OWTS. In this scenario up to around 25 GW is installed by 2030 and 30 GW by 2035.
- England / Wales maximum delivery - this is set out as the most optimistic scenario and shows the potential of increasing onshore wind deployment through strengthened policies in England and Wales. Under this scenario onshore wind deployment could reach levels consistent with the 2030 Clean Power range but also increases to in excess of 35 GW by 2035.

5.3.63 The OWTS addresses implementation and states (page 71) that the Government is committed to delivering the level of onshore wind needed by 2030 and is establishing a new Onshore Wind Council to oversee its implementation.

5.4 Government Statement on Energy Security (March 2026)

5.4.1 The Energy Secretary (The Right Hon Ed Miliband MP) issued a statement on 15 March 2026 outlining a package of measures to go "further and faster" in the pursuit of national energy security, as a response to events in the Middle East. The Energy Secretary announced various energy interventions to boost the UK's energy security and stated an intention to bring forward the Government's next annual renewables auction to July 2026. The Energy Secretary stated:

"Global events demonstrate there is not a moment to waste in our drive for clean power because there can be no energy security while we are so dependent on fossil fuels… everything we are doing is about one purpose: fighting the corner of the British people by taking back control of our energy".

5.5 Renewable Energy Legislation and Policy: Conclusions

5.5.1 The Applicant's position is that the Proposed Development is very strongly supported by the current climate change and energy policy framework. The carbon balance calculations establish that the Proposed Development could result in the saving of approximately 11,747 tonnes of carbon dioxide equivalent emissions per annum during the 40-year operational lifetime of the Proposed Development.

5.5.2 The trajectory, in terms of the scale and pace of action required to reduce emissions, grows ever steeper, and it is essential that rapid progress is made otherwise the legally binding target of net zero by 2050 will not be met.

5.5.3 It is clear from the UK Energy White Paper and the forecasts by the CCC that electricity demand is expected to grow substantially (scenarios vary but potentially by a factor of three or four) as carbon intensive sources of energy are displaced by electrification of other industry sectors, particularly heat and transport.

5.5.4 Decisions through the planning and wider consenting system must be responsive to this position. Decision makers can do this by affording substantial weight to the energy policy objectives articulated above, in the planning balance in a given case.

5.5.5 The Government have demonstrated a clear commitment to the delivery of new onshore wind in England through the recent publication of the Onshore Wind Task Force Strategy.

5.5.6 It must follow that the need case for the Proposed Development is to be afforded substantial weight in the planning balance. The way that decision makers can do that is by properly recognising the seriousness and importance of energy policy related considerations in the planning balance, and the contribution of the Proposed Development to meeting net zero and low carbon energy targets. It is the cumulative effect of a large number of individual projects which will the UK towards where it needs to be in order to attain net zero.

6. The Benefits of the Proposed Development

6.1 The Benefits: Summary

6.1.1 This Section summarises the benefits that would arise from the Proposed Development.

Renewable Energy Generation

> With an installed capacity of up to approximately 25.2 MW, based on the candidate turbine used in assessment, of onshore wind energy, the Proposed Development would make a valuable and important contribution to the attainment of the UK Government targets and policies of encouraging renewable energy developments; and in turn contribute to the achievement of UK renewable energy and net zero targets.

> The Proposed Development is estimated to produce the equivalent power as consumed by approximately 24,000 average UK households annually, which would be a significant contribution to the green energy requirements in the UK.

> The UK legally binding target of net zero GHG emissions by 2050 is a major challenge, as explained in the previous Section.

> The earlier that steps towards decarbonisation are introduced, the greater their contribution to limiting climate change. The Proposed Development's delivery of renewable generation and electricity storage capacity will have a disproportionately higher benefit than the same capacity delivered later.

Emissions Savings

> The carbon balance calculations establish that the Proposed Development could result in the saving of approximately 11,747 tonnes of carbon dioxide equivalent emissions per annum if a grid mix of electricity generation were used as the counterfactual position during the 40-year operational lifetime of the Proposed Development.

> The expected carbon payback time of the Proposed Development, based on the Carbon Calculator output, is 3.5 years for a grid mix generation. This is the period of time for which a wind farm needs to be in operation before it has avoided as much carbon dioxide as was released in its lifecycle (i.e. accounting for construction, operation and decommissioning as determined through the use of the Scottish Government Carbon Calculator). The Carbon Balance Assessment for the Proposed Development is provided at Appendix 10.4 of the ES.

> In summary, the Proposed Development will generate carbon savings for ~81% of its lifetime, as such the Proposed Development is considered to have a beneficial effect on carbon emissions.

Security of Supply and Energy Storage

> The British Energy Security Strategy has been referenced. It provides an increase to the requirements for both the scale and the urgency of delivery of new low carbon generation capacity, by refocussing the requirement for low-carbon power for reasons of national security of supply and affordability, as well as for decarbonisation.

> Within this context, the attractiveness of onshore wind, as a proven technology which will deliver significant benefits to consumers through decarbonisation, security of supply and affordability this decade, becomes clear.

> The Proposed Development, if consented, would provide a valuable contribution to security of supply for UK. Consenting the development, would contribute to an adequate and dependable UK generation mix, through enabling the generation of more low carbon power from renewable resources, and would enable the Proposed Development to make a significant contribution to wider UK energy security and decarbonisation needs.

Economic Benefits

6.1.2 The Applicant has submitted and Economic Statement in support of the application. The local economy within the East Riding of Yorkshire is strong in construction, manufacturing and land-based industries, with low unemployment. It is considered that there is good local capacity to support construction.

6.1.3 During the development and construction, it is estimated that the Proposed Development would generate:

- £1.4 million Gross Value Added (GVA) and 15 years of employment in East Riding of Yorkshire;
- £3.5 million GVA and 43 years of employment in Yorkshire and the Humber; and
- £14.6 million GVA and 183 years of employment in the UK.

6.1.4 During its operation and maintenance, each year the Proposed Development could also generate:

- £0.1 million GVA and ,1 job in East Riding of Yorkshire;
- £0.3 million GVA and 3 jobs in Yorkshire and Humber; and
- £1.3 million GVA and 11 jobs in the UK.

6.1.5 The Proposed Development would contribute ~£350,000 per year to the Local Council in terms of business rates.

Community Benefits

6.1.6 While not a material planning consideration, an annual community benefit fund of £5,000/MW (£126,000) is proposed as part of the Proposed Development.

Biodiversity Enhancement

> An oLBMEP is submitted in support of the application with an objective to restore and enhance habitats within the site to deliver a net biodiversity gain, including restoration of 5.0 ha of wildflower meadow, 0.97 ha of new pond creation and planting of 477 m of new native species-rich hedgerow. Full details are set out in the oLBMEP (Appendix 7.11 of the ES).

7. Conclusions

7.1 Planning Balance

7.1.1 The Proposed Development has been demonstrated to be in accordance with the Development Plan and national planning and energy policy. An important factor is the recent and fundamental policy shift at the UK Government level in terms of the support for renewable energy developments and the importance of these projects to clean power 2030 and reaching net zero by 2050 as well as the contribution they make to security of supply and reducing the overall cost of energy. These are very relevant and important factors to be weighted in the planning balance.

7.1.2 A strong level of support for large renewable energy generation, including onshore wind, is provided within national planning policy by way of the NPPF, the draft NPPF and NPS documents and the development would make a valuable contribution to national energy targets to attain net zero. Policy provides that consent should only be withheld if the adverse effects of a development significantly outweigh the benefits.

7.1.3 The Proposed Development is advantageously located within close proximity to an available grid connection and consented energy park and would enhance local biodiversity and deliver economic benefits. The Proposed Development has secured a grid connection that would enable connection to the grid by 2030. In addition, NESO has confirmed that the project has achieved Gate 2 status, that is, the project is strategically aligned to the capacities within the Clean Power 2030 Action Plan.

7.1.4 In weighing up the planning balance it is necessary to consider the impact of the Proposed Development on the environment and the significant adverse effects reported – which are limited to landscape and visual matters – against the important benefits in terms of the renewable energy generated and indeed the biodiversity enhancement measures proposed.

7.1.5 The ES concludes that that there would be no other significant adverse residual effects including in relation to biodiversity interests; noise; traffic and transport; flood risk; and cultural heritage assets. The assessment in relation to heritage assets is considered to result in less than substantial harm to the eight heritage assets considered. However this requires to be considered alongside the public benefits which the Proposed Development would deliver. The significant and important public benefits of the Proposed Development have been set out in Section 6 of this Planning Statement. These include:

- The production of sustainable energy over the 40 year lifespan of the Proposed Development.
- The contribution towards a reduction in environmental harm.
- The contribution to energy security. As noted in a recent statement by the Energy Secretary, referenced in Section 5 of this Planning Statement, there is ‘not a moment to waste’ in the drive for clean power, in order ‘to take back control of our energy’.
- The Proposed Development will also result in BNG which would not be delivered without the Proposed Development.
- The Proposed Development will deliver Economic benefits to the local and regional economy, including through annual business rates job creation and spend in the area during construction.

7.1.6 It is therefore considered that there is ***clear and convincing justification*** for the less than substantial harm that is predicted on the heritage assets considered, in line with national and local policy, which are weighed heavily in the planning balance in favour of the Proposed Development.

7.1.7 Another matter to consider is the planning history of the Site and surrounding area which is a further important material consideration. Part of the Site and land adjoining to the east benefits from planning permission for a Renewable Energy Park comprising a solar array and other works. Historically, and as set out in Section 1, a proposal for a wind farm was refused planning permission by the Secretary of State in May 2014. At the time the Inspector appointed to undertake the Public Inquiry found that the Thornholme Proposals were acceptable and recommended the application be approved. It is fully accepted that the current proposal is different in terms of some aspects of scale however the previous position of the Inspector demonstrates that the Site and area is suitable in principle for renewable energy and specifically onshore wind.

7.1.8 As noted it is important to recognise that at the time of the Thornholme refusal there was an almost defacto bad on onshore wind in England brought in by the hostile Political stance at the time against onshore wind development. The national planning and energy policy position has fundamentally evolved since the decision on the Thornholme Energy Park. The position changed considerably with the UK Government change at Westminster and a Labour administration for the UK in 2024 which set a new UK Government policy approach to net zero. The UK Government see the clean energy transition as a huge opportunity to generate growth and also to tackle the cost-of-living crisis.

7.1.9 The current Labour administration is accelerating the pace of renewable development to achieve net zero, which has been seen through the publication of the Clean Power Action Plan 2030 and the Onshore Wind Taskforce Strategy 2025 which are discussed in detail within Section 5 of this Planning Statement. The Clean Power Action Plan requires that to decarbonise the power sector by 2030, 27-29GW onshore wind will be needed within GB. It is explained that the delivery of up to 29 GW of onshore wind by 2030 would involve around 10 to 12 GW more than would have been deployed under historic growth rates, with England contributing around 2 GW by 2030.

7.1.10 As previously mentioned, the Proposed Development has secured a grid connection that would enable connection to the grid by 2030. In addition, NESO has confirmed that the project has achieved Gate 2 status, that is, the project is strategically aligned to the capacities within the CP30 Action Plan.

7.1.11 The UK Government's NPS EN-3 recognises that modern onshore wind turbines are large, moving structures, and such impacts are to be expected from their construction and operation. While the NPS documents are specific to NSIP applications, they provide useful guidance and set the policy intent of the UK government in relation to renewable energy. In addition, the NPS state that *"While some significant impacts on the local area are to be expected, the arrangement of wind turbines should be carefully designed within a site to minimise effects insofar as practically possible on the landscape and visual amenity while meeting technical, ecological and operational siting requirements and other constraints.*

Where the main impacts are localised and/or appropriate design mitigation has been applied, noting some wider visual impacts are also likely to be expected, the SoS should consider these as acceptable. Whether impacts are localised will need to be considered on a case-by-case basis depending on the individual circumstances of the project, location and nature of the impacts. Considerations of whether the main impacts are localised will likely include the geographic or spatial extent of the impacts and the importance of the receptor."

7.1.12 In relation to the Proposed Development, it is noted that the significant adverse effects predicted would not result in significant adverse effect on nationally designated landscapes, and based on the conclusions within the LVIA are considered to be localised as they are limited in extent.

7.1.13 The Proposed Development is considered to accord with the Development Plan when read as a whole. There is also a wealth of material considerations which provide strong support for the Proposed Development such that it is considered that planning permission should be granted subject to appropriate planning conditions.

7.2 Conclusion

7.2.1 As set out in Section 1, planning applications are required to be determined under the provisions of Section 38(6) of the Planning and Compulsory Purchase Act 2004 which requires that:

"Where making any determination under the Planning Acts. Regards is be had to the development plan, then determination shall be made in accordance with the plan unless material considerations indicate otherwise".

7.2.2 As such, the key questions for the Proposed Development are:

> Is the Proposed Development in accordance with the adopted Development Plan?

> Are there material considerations that determine a decision should be made contrary to the Development Plan? Or do material matters further support the position that the Proposed Development should be approved?

7.2.3 The answers to the key questions posed are:

> Based on the appraisal set out above the Proposed Development is considered to accord with the relevant policies of the Development Plan when read as a whole.

> The NPPF and draft NPPF are important material considerations and provide support in principle for large-scale renewables and are the most up to date national policy provisions which are in favour of approval of the proposal.

> The other relevant material considerations further support the position that the Proposed Development should be granted planning permission.

7.2.4 It is considered that planning permission should be granted subject to appropriate planning conditions.

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