

1.0 Introduction

- 1.1.1 This Addendum supplements the Statement of Common Ground dated 12 January 2026 in respect of the Section 78 appeal concerning the development at the Land east of Guanockgate Road, Nr. Sutton St Edmund, Lincolnshire, PE13 4PY ('the appeal site'), under appeal ref: 6001285. It records the parties' agreed position following publication of the National Planning Policy Framework on 17 August 2026.
- 1.1.2 Unless stated otherwise below, the matters recorded as common ground in the agreed Statement of Common Ground dated 13th January 2026 remain unchanged. The table retains the same Common Ground Reference and topic numbering and only records topics where the August 2026 NPPF is material.
- 1.1.3 In this context, the following matters are agreed between the appellant and the Council:

Common Ground Reference	Topic	Common Ground Detail
5	Principal of Development	It is agreed that the principle of a solar farm, BESS and ancillary infrastructure is acceptable and supported by local and national policy. It is agreed that the appeal scheme falls within energy infrastructure under NPPF Policy S5(1)(a) and is supported in principle outside settlements, subject to the balance required by Policy S5(1). That policy directs approval unless the benefits would be substantially outweighed by adverse effects when assessed against the national decision-making policies as a whole. It is agreed that the appeal scheme will make a very significant contribution to national and local renewable energy and climate change targets. It is agreed that NPPF Policy W3(1)(a) directs that substantial weight should be given to each of the following, all of which are applicable to the appeal scheme: 1. the benefits of renewable and low carbon energy development for improving energy security 2. supporting economic development 3. the transition to a net zero future. It is agreed that Policy W3(2) does not require applicants to demonstrate the need for renewable energy development. The parties agree that there is an urgent need to significantly

		increase renewable energy generation to meet the Government's Clean Power 2030 objective and the statutory target for Net Zero by 2050. These agreements do not resolve the parties' disagreement over the agricultural effects, the justification for the selected site and proposed footprint, or the overall planning balance.
16	Archaeology	Both parties agree that the appellant has suitably assessed the site for archaeological potential through the Written Scheme of Investigation and described the significance of any assets in a proportionate way and in accordance with local policy and policy HE5(5) of the NPPF.
17	Visual Impact and Landscape	Both parties agree that when considered against the climate change benefits the harm to landscape character is outweighed, when considered in the context of policy W3(1)(a)
23(a)	Flood risk & Drainage	Both parties agree that the site falls within flood zone 3a. It is agreed that the August 2026 NPPF expressly classifies solar farms as "Essential Infrastructure" for flood-risk purposes in Annex F, Table 2. Annex F, Table 3 confirms that Essential Infrastructure in Flood Zone 3a is subject to the exception test and should be designed and constructed to remain operational and safe in times of flood. The officer report states of the sequential test that there were no preferable places within the geographic area of search, in flooding terms. The proposal therefore passes the sequential test. The exception test is demonstrated to be passed suitably within the Flood Risk Assessment submitted in support of the application.
27	South Holland Local Plan Policy 31	Both parties agree that Policy 31 remains part of the development plan. In accordance with NPPF Annex A, paragraph 2, its "no significant harm" requirement carries very limited weight where it conflicts with the balance required by Policy S5. Agricultural land take remains relevant to the assessment, including under Policy 31(B)(4) and NPPF Policy N2(1)(b).
28	Food Security and National Security	The Council no longer pursues the allegation that the appeal proposal would itself threaten national food security or national security. That allegation is therefore no longer a matter in dispute between the parties. This does not alter the Council's continuing objection concerning the restriction on

		arable use and agricultural versatility of BMV land during the development's lifetime.
29	Agricultural Effects Remaining Dispute	SHDC Comments: The Council considers that restricting the arable use and agricultural versatility of Grade 2 and Grade 3a land during the proposed 40-year operational period would cause substantial agricultural harm. It recognises that sheep grazing would retain an agricultural use and that the Outline Soil Management Plan seeks to provide for eventual restoration of parts of the site (outside of BESS), supported by appropriate conditions. The Council considers that these measures do not remove the agricultural harm during operation. The appellant disputes the Council's assessment of that harm.
30	Site Selection Remaining Dispute	SHDC Comments: The parties disagree about whether the site-selection evidence adequately addresses the preference for poorer-quality agricultural land under NPPF Policy N2(1)(b), read alongside the relevant provisions of EN-3 and Planning Practice Guidance. The Council's concerns relate to the search area (which actively peruses BMV land (grades 2 & 3), minimum site size and reliability of agricultural-quality comparisons. It seeks a proportionate assessment of realistic alternatives, rather than an unrestricted search or proof that poorer-quality land does not exist anywhere. The appellant considers that its evidence provides a robust justification for the selected site.
31	Development Footprint Remaining Dispute	SHDC Comments: The parties disagree about whether the agricultural effects of the proposed footprint, including overplanting and panel spacing, have been adequately justified against the benefits delivered by the full scheme. The Council does not object to overplanting in principle or apply a separate requirement that its effects must be unavoidable. Its objection concerns the agricultural consequences of the proposed extent of development. The appellant considers that the proposed land take is justified.
32	Planning Balance Remaining Dispute	SHDC Comments: The parties agree that the balance in NPPF Policy S5(1) applies and that substantial weight should be given to the relevant benefits under Policy W3(1)(a). The Council considers that the agricultural harm substantially outweighs the proposal's benefits, taking account of the scheme's other benefits and the proposed grazing and restoration arrangements. The appellant disagrees and considers that the appeal should be allowed. The Council's site-selection and footprint concerns relate to the justification for the agricultural harm and are not counted as separate additional physical harms.

2.0 For Clarity

2.1 The withdrawal of the food-security and national-security allegation does not withdraw the Council's agricultural objection. The remaining disputes are those identified at references 29–32.

2.2 Agreement on support in principle, renewable-energy need and the applicable policy balance does not amount to agreement that this particular proposal is acceptable. The parties continue to disagree on the agricultural effects, the justification for the site and footprint, and the outcome of the planning balance.

2.3 References 28–32 supersede Points 1–5 of the original “Matters in Dispute” section. All other previously agreed matters remain unchanged except where expressly amended by this Addendum.

3.0 Signatures

Signed:



Date: 23rd September 2026

Name: Ben Murphy

On behalf of the appellant

Signed:



Date: 21st September 2026

Name: Mark Niland

On behalf of South Holland District Council