

To: James Hyde
Barnsley Council

From: Stantec/Enviromena

Project/File: 333101598 Grimethorpe Solar Farm Date: October 2025

Reference: 2024/1096: Grimethorpe Solar Farm - Grey Belt Assessment

1. Introduction

This Grey Belt Assessment has been prepared by Stantec on behalf of Enviromena, (the “Applicant”) of the above referenced planning application for a solar farm on land west of Grimethorpe, Barnsley (the “Site”). This assessment has been prepared at the request of Barnsley Metropolitan Council, to demonstrate that the Site should be considered Grey Belt land.

The NPPF has introduced the land-classification of ‘Grey Belt’ land. The Applicant considers that ‘Grey Belt’ has been introduced and defined in order to facilitate developments like this one, as appeals precedent has established. In summary, the Applicant considers that the Site is Grey Belt and therefore its development for ground mounted solar is not inappropriate in the Green Belt.

2. Grey Belt Policy Context

Grey Belt is defined in the NPPF (Glossary, Annex 2) as:

*“...land in the Green Belt comprising previously developed land and/or **any other land** that, in either case, does **not strongly** contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a **strong reason** for refusing or restricting development.” (emphasis added)*

NPPF Paragraph 155 sets out that housing or ‘other development’ in the Green Belt should not be regarded as inappropriate where the following tests apply:

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- a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
- b. There is a demonstrable unmet need for the type of development proposed;
- c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of the NPPF; and
- d. Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157.

Green Belt Purposes (a), (b) or (d), being:

- a. to check the unrestricted sprawl of large built-up areas;
- b. to prevent neighbouring towns merging into one another; and
- d. to preserve the setting and special character of historic towns.

It is important to note that Grey Belt development can conflict with Green Belt purpose (c)(encroachment) and purpose (e) (urban regeneration). In short, the NPPF accepts that whilst development can inevitably result in encroachment but that such encroachment is acceptable provided other Grey Belt tests are satisfied. Furthermore, the Grey Belt definition also accepts that land can contribute to a lesser degree (i.e. not strongly) to purposes (a), (b), and (d) and still be considered Grey Belt.

NPPF Footnote 7 identifies the following: habitats sites (and those sites listed in NPPF paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change. None of these matters affect this proposal.

NPPF Footnote 55 sets out that development considered as not inappropriate on Grey Belt land is not required to give substantial weight to any harm to the Green Belt, including its openness, and therefore a development proposal would not need to be justified by 'very special circumstances'.

In February 2025 the Government updated the Planning Practice Guidance (PPG) on the role of the Green Belt in the planning system reflecting the introduction of Grey Belt. It clarifies the considerations involved in assessing the contribution Green Belt land makes to Green Belt purposes where relevant to identifying Grey Belt land, and importantly, it also sets out guidance for considering proposals on potential Grey Belt land including detail and definitions for what constitutes a 'strong', 'moderate', or a 'weak to no' contribution for purposes a), b) and d).

Also, the PPG update clarifies that where Grey Belt sites are not identified in existing plans or Green Belt assessments, it is expected that authorities should consider evidence, including the PPG, as to "*Whether the site strongly contributes to the Green Belt purposes a, b, or d*".

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As such, the role the Site itself plays should be assessed. Decision-taking will be undermined if it relies upon an assessment on the role of a wider notional parcel in which a site may sit.

It is also important to note that the PPG guidance is clear that villages are not to be considered in respect of purposes a), b) and d). This is a significant clarification with many previous Green Belt assessments considering any scale of settlement against the Green Belt purposes. Only towns and “*large built-up areas*” are to be considered.

The PPG advises that where there are no historic towns in the plan area, it may not be necessary to provide detailed assessments against this purpose. It is clear however, that this purpose relates to historic towns, it does not relate to Conservation Areas or individual heritage assets. Assessments of the role of land against setting of individual heritage assets is incorrect.

3. Grey Belt Assessment

NPPF paragraph 155 effectively creates a two-stage process to follow to assess whether a site is Grey Belt and its development would not be inappropriate:

Stage 1. Grey Belt Definition Tests – site-led consideration

- Test 1: considering the Site against the three Green Belt purposes; and
- Test 2: considering against potential harm to Footnote 7 assets.

Stage 2. Para 155 Appropriateness Tests – development -led consideration.

- Test 3: impact on remaining Green Belt;
- Test 4: meeting demonstrable need;
- Test 5: confirming sustainable location; and
- Test 6: providing Golden Rule contributions.

Consideration of the Site and Proposed Development against each of these ‘tests’ is set out in the following table.

Grey Belt Test	Assessment	Result
Stage 1		
Does the Site strongly contribute to Green Belt purpose a), b), or d)?	The Council’s most recent Green Belt assessment, the ‘Green Belt Review’ ¹ (GBR), was prepared by Arup in 2014 as part of the evidence base to inform the (then) emerging Barnsley Local Plan. As such it predates the NPPF/PPG Grey Belt updates by almost a decade, its methodology is therefore considerably dated.	Passed

¹ Green Belt Review: Approach and Method Report (November 2014); Green Belt Cudworth (including the village of Brierley) (August 2014).

	<p>The purpose of the GBR was to assess large parcels of land for Green Belt release to accommodate housing and commercial development. The Site falls within GBR “General Areas” CUD4 and CUD5 within the GBR which comprise significantly larger land tracts of land than just the application Site. The two General Areas cover a total of 621 hectares, compared to the modest 90ha of the application Site.</p> <p>Exact consideration of the Site is therefore not reflected in the GBR. However, as the only available assessment of land comprising the Barnsley Green Belt it provides a starting point but cannot be relied upon in its entirety and requires sense checking against updated guidance on assessing the contribution land makes to the Green Belt purposes.</p> <p>The contribution the Site makes to the relevant Green Belt purposes is set out below utilising the GBR, and most recent updates to the NPPF and PPG.</p> <p>Green Belt purpose a) seeks to check the unrestricted sprawl of large built-up areas.</p> <p>The PPG is clear and unequivocal that “<i>villages should not be considered large built-up areas</i>”. It also advises that sites considered to make a weak contribution to this purpose are likely to be those that not adjacent to a large built-up area.</p> <p>The GBR defines² Urban Barnsley (including the settlements of Darton and Dodworth) as comprising the “<i>large built-up area</i>”. It goes on to state that “<i>Preventing the unrestricted urban sprawl of this centre is the focus of this ‘purpose’, and therefore Green Belt in this area should function to:</i></p> <ul style="list-style-type: none"> • <i>Protect open land contiguous to one of the following: Urban Barnsley, Royston, Goldthorpe, Cudworth, Wombwell, Hoyland, Penistone and the Villages.</i> • <i>Protect the strategic gap between Barnsley town centre and the larger towns of Royston, Goldthorpe, Cudworth, Wombwell, Hoyland and Penistone”</i> <p>Being situated to the east of Cudworth, the GBR therefore accordingly concludes that General Areas CUD4 and CUD5 do “<i>...not function to protect a strategic gap between Urban Barnsley and Cudworth (Shafton or Grimethorpe).</i>”</p>	
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² Green Belt Review: Approach and Method Report (November 2014) Section 6 Glossary of Terms

	<p>Given that the application Site is considerably smaller than CUD4 and CUD5 it serves even less of a contribution to preventing the sprawl of the “<i>large built-up area</i>” and so in accordance with PPG direction it offers <u>no contribution</u> to purpose a).</p> <p>In summary, the Site <u>does not</u> perform strongly in respect of Green Belt purpose a).</p> <p>Green Belt purpose b) seeks to prevent neighbouring towns merging into one another.</p> <p>The PPG is clear that this purpose relates to the merging of towns, not villages or smaller settlements.</p> <p>Guidance on purpose b) sets out that to be strongly performing, a site is likely to be free of existing development, form a substantial gap between towns and development would likely result in the loss of visual separation of towns. Larger parcels are therefore more likely to make a strong contribution to purpose b). Smaller parcels that could be developed without the loss of visual separation between towns, or those that do not contribute to visual separation are deemed to be moderate or weakly performing respectively.</p> <p>The GBR identifies six principal towns in the Borough comprising: Royston, Goldthorpe, Cudworth, Wombwell, Hoyland and Penistone. The GBR specifically identifies at Section 5.2.3 that it is important that the Green Belt continues to ensure Royston, Cudworth, Wombwell and Hoyland do not merge with each other due to their proximity.</p> <p>The application Site, being located on the eastern side of Cudworth, therefore provides <u>no contribution</u> to preventing Cudworth merging with other Principal Towns.</p> <p>It is noted that the GBR does not explicitly identify Grimethorpe as a settlement, but in considering the role of CUD5 it is highlighted that: “<i>The Barnsley Settlement Assessment (Jacobs 2007) identified Cudworth, Grimethorpe and Shafton as forming part of the ‘Cudworth Urban Area’.</i> In this regard it is also noted that the Local Plan Settlement Hierarchy identifies Cudworth as including Grimethorpe, as together forming a Principal Town. In short Cudworth and Grimethorpe are functionally and physically linked as a settlement.</p> <p>The Site therefore <u>cannot perform strongly against purpose b)</u> as Cudworth and Grimethorpe are considered to function as a single town.</p> <p>The Site therefore <u>does not</u> perform strongly in respect of purpose b).</p>	
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	<p>Green Belt purpose d) is to preserve the setting and special character of historic towns.</p> <p>Again, the PPG clarifies that this purpose relates to historic towns, not villages³.</p> <p>The PPG advises that where there are no historic towns in the plan area, it may not be necessary to provide detailed assessments against this purpose.</p> <p>The Green Belt Review confirms under Section 5.2.3 that “...<i>there are no historic towns within the Borough.</i>”</p> <p>The Site therefore <u>does not</u> perform strongly in respect of purpose d).</p>	
<p>Does the Site fall within designations under Footnote 7 which would form a strong reason to restrict development?</p>	<p>The Site is not covered by any heritage, ecology or landscape designations, nor is it in a National Park or contain irreplaceable habitats. It is predominantly within Flood Zone 1 and whilst there are small areas of Flood Zone 2 no development is in this extent ensure that there are no “substantive risks or harm” that would direct restriction of development of the Site.</p> <p>Consequently, there no “Strong Reasons” under Footnote 7 and Stage 1 is deemed to be passed.</p>	<p>Passed</p>
<p>Stage 2</p>		
<p>Will development of the Site fundamentally undermine the purpose of remaining Green Belt?</p>	<p>Over 77% of the Borough is covered by Green Belt designation amounting to some 23,000 hectares/ 230.5sqkm. At 90 hectares the Site represents a very small fraction (c.0.39%) of the Borough’s overall Green Belt provision.</p> <p>Furthermore, it is important to reiterate that solar development does not require land designated as Green Belt to be released from that designation. The land retains its Green Belt designation during the scheme’s functional lifetime and after decommissioning. Accordingly, there will be no material qualitative or quantitative change to the Barnsley Green Belt because of the proposals.</p>	<p>Passed</p>
<p>Is there demonstrable unmet need for the development proposed?</p>	<p>Climate change is regarded by many as the most serious threat facing the global environment, economy, and society. The overwhelming scientific consensus is that there is a link between human actions and climate-related issues such as rising temperatures, rising sea-levels, melting ice caps and changes in the pattern and severity of weather systems.</p> <p>Reflecting the urgent and critical need for green energy, the NPPF is clear (Paragraph 168) that there is no requirement for an applicant to demonstrate overall need for renewable or low carbon development</p>	<p>Passed</p>

³ Paragraph: 005 Reference ID: 64-005-20250225

	<p>proposals. Notwithstanding this, it is nevertheless useful to summarise the ‘need’ context behind the proposals to reiterate the unequivocal national and local policy support for the principle of renewable energy developments.</p> <p>As set out in the supporting Planning Statement, at the national level there is extensive Government legislation, guidance and policy supporting the transition of the UK to a low-carbon economy. The UK is party to the United Nations Framework Convention on Climate Change and as such has signed up to international climate change obligations, such as the Kyoto Protocol and the Paris Agreement. The Climate Change Act 2008 is the basis for the UK’s approach to tackling and responding to climate change. Through the Act, the UK Government has set a target to significantly reduce greenhouse gas emissions, committing in law to reducing greenhouse gas emissions by at least 100% of 1990 levels (Net Zero) by 2050. Decarbonising the UK’s energy sector is integral to achieving net zero target, and as such the UK Government set an expedited commitment for the UKs energy sector to be carbon neutral by 2035. To achieve this requires major investment into renewable technologies, such as solar power.</p> <p>This overarching urgent need is reflected at the local level with Barnsley Council setting a commitment to become a net zero borough by 2045. The Council have adopted the Barnsley Zero Carbon Sustainable Energy Action Plan which identifies a need for increased renewable energy production within the borough if they are to achieve their Net Zero target. Local Plan Policy CC1 reiterates this, setting a principle that renewable energy schemes will be approved unless there are significant adverse impacts in doing so.</p> <p>Unmet need is therefore demonstrated.</p>	
<p>Is the development in a sustainable location, with reference to NPPF paragraphs 110 and 115?</p>	<p>This purpose of the Grey Belt definition is less relevant due to the nature of the Proposed Development directed as it is towards residential and commercial development and limiting the need to travel. However, it is relevant to note there are no objections from the local highway authority on the accessibility of, or access to, the Site. Officers have agreed that traffic generated by the development will have no significant impact on the safe or efficient operation of the local road network during the construction or operational phases.</p> <p>As such it is demonstrated that the Site is in a sustainable location mindful of the NPPF transport requirements set out in paragraphs 110-115.</p>	<p>Passed</p>
<p>Will the development contribute to the Golden Rules?</p>	<p>The ‘Golden Rules’ relate specifically to residential development and consequently are not relevant or applicable in this case.</p>	<p>Passed</p>

4. Conclusion

The Applicant contends that the Site clearly satisfies the definition of 'Grey Belt' land, in which case the Proposed Development would not be inappropriate in the Green Belt.

The Applicant also highlights that under the exemptions of paragraph 155, the Proposed Development is appropriate it should not be regarded as harmful either to the openness of the Green Belt or to the purposes of including land in the Green Belt and there is no requirement to demonstrate Very Special Circumstances.

It is also important to reiterate that solar development does not require land designated as Green Belt to be released from that designation. The land retains its Green Belt designation during the scheme's functional lifetime and after decommissioning. Accordingly, there will be no material qualitative or quantitative change to the Barnsley Green Belt because of the proposals.

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