

Frankham X Alpaca Communications

6 months on - Opportunities and risks for medium utility scale solar developers in relation to the increase in the Solar NSIP threshold from 50MW to 100MW.

Learn more



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The context

On 31 December 2025, an amendment to the Nationally Significant Infrastructure Project (NSIP) regime came into force, increasing the NSIP threshold for solar generating stations from 50MW to 100MW. The change was implemented through the Infrastructure Planning (Onshore Wind and Solar Generating Stations) Order 2025, which amended the Planning Act 2008.

In practical terms, the reform means that solar farms with an export capacity between 50MW and 100MW can now be determined through the local planning system by local authorities, rather than requiring consent through the Development Consent Order (DCO) process administered by the Planning Inspectorate.

The principal objective of the reform was to address what many in the industry referred to as the “solar dead zone”. Under the previous 50MW threshold, developers frequently designed projects at 49.9MW to avoid the additional cost, complexity and timescales associated with the DCO regime. At the same time, developers pursuing the DCO route often needed to promote substantially larger schemes to justify the expense and resource requirements involved. The result was a notable absence of projects between 51MW and 100MW, creating a gap in the market for medium-scale utility solar developments¹.

The introduction of the new 100MW threshold is intended to unlock this part of the market by allowing medium-sized solar projects to be consented through local planning authorities.

This piece reflects on how the market is reacting just over six months on from the introduction of the new DCO solar threshold, what the main opportunities and risks for medium scale solar developers pursuing a consent via a local authority are. Thoughts are also offered on how the new consenting route for 51MW-100MW solar projects compares to the NSIP consenting route, itself subject to recent reforms.

Finally, through the contribution of Alpaca Communications, we look at the changing political landscape within the UK and the implications that this has on the promotion of medium utility scale solar farms and associated considerations.



¹ For clarity any reference to medium scale solar development/ solar projects with this article refers to solar farm proposals with an export capacity of 51-100MW



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Six months on - what projects are emerging?

The following projects provide some of the earliest examples of medium scale schemes progressing under the new planning landscape:

Project	Developer	Local Planning Authority	Planning Application Reference/s with hyperlinks.	Capacity	Status
Hedgehog Grove Solar Farm		Uttlesford & Braintree	UTT/26/0445/FUL 26/00440/FUL	 98MW	Former NSIP project. Planning application submitted. Validated 24 March 2026.
North Ray Solar Farm		East Lindsey, Lincolnshire	00444/26/FUL	 98MW	Planning application submitted. Validated 15 April 2026.
Lostrigg Solar Farm		Cumberland Council	N/A	 100MW	Former NSIP Project. Project currently paused until September 2026. However, intention is to now advance the project via a planning application.
Land at Sawgate Road, Burton Lazars Solar Farm		Melton Borough Council	26/00210/EIA	 99.9MW	EIA screening request submitted. Not EIA 31 March 2026.
Desborough Airfield Solar Farm		North Northamptonshire	N/A	 99.9MW	In development, no planning submissions.
Brailsford Solar Farm		Derbyshire Dales District Council	26/00495/EIA	 55MW	EIA screening request submitted 1 May 2026.
The Mymms Solar Farm		Hertsmere Borough Council	26/0723/EI1	 60MW	EIA screening request submitted 27 May 2026.



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Six months on - what projects are emerging?

Whilst it has only just passed six months since the new DCO threshold for solar projects came into force, these projects demonstrate that developers are beginning to utilise the new consenting route and test the appetite of local planning authorities for medium scale utility-scale solar developments.





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Opportunities and risks for medium scale solar developers as a result of the new NSIP threshold for solar farms

Opportunities

The main opportunities provided by the emergence of the local consenting route for medium scale solar farms typically are:

- **Reduced consenting costs** compared with the DCO process.
 - **Shorter timescales** in theory, shorter determination timescales provided that solar projects are initially granted and not subject to appeal. Timescales difference between DCO's and TCPA refusal and planning appeal narrows.
 - **Increased viability** for medium-scale projects that previously sat within the "solar dead zone".
 - **Greater flexibility during project design and evolution** - the new 100MW threshold provides greater flexibility for developers to optimise project design and the use of land based on environmental constraints, land availability, grid capacity, agricultural considerations and commercial viability without immediately triggering the DCO process. Too often under the old 50MW threshold project designs were determined by planning legislation rather than technical or environmental considerations.
 - **Improved ability to align project size with grid capacity** - grid connection offers are often the single biggest driver of project capacity. Under the previous regime, there was frequently a mismatch between the capacity offered by the network operator and the capacity developers were willing to pursue from a planning perspective. In the instance of receiving a 75MW export capacity offer from the network operator for instance, developers would previously either scale down to 50MW leaving 25MW of grid capacity unused or pursue consent via the costly DCO process. Neither option was ideal.
- Under the new threshold, the developer can now design a scheme closer to the available grid capacity whether that is 60MW, 75MW, 90MW or 99.9MW and seek consent through the local planning system.



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Opportunities and risks for medium scale solar developers as a result of the new NSIP threshold for solar farms

Risks

The main risks provided by the emergence of the local consenting route for medium scale solar farms are:

- **Greater variation in decision-making between local authorities** - unlike the DCO process, which is determined against a national policy framework, local planning applications are assessed by individual authorities. This can result in varying approaches to planning balance, landscape impacts, agricultural land classification and renewable energy policy.
- **Increased political influence at local level** - decision-making within the TCPA regime is often more susceptible to local political considerations. Elected members may place significant weight on local concerns and community sentiment, particularly where proposals attract substantial public interest or opposition.
- **Resource constraints within planning departments** - many local authorities continue to face staffing and resourcing pressures. This can affect the speed of determination, consistency of decision-making and availability of specialist expertise when assessing complex utility-scale renewable energy projects.
- **Potential inconsistency in approaches to Environmental Impact Assessment (EIA), cumulative impact assessment and agricultural land considerations** - approaches to the EIA, cumulative impact assessment, landscape assessment and agricultural land considerations can vary between authorities, creating greater uncertainty for developers when compared with the more standardised DCO regime.
- **Greater exposure to local opposition and committee-based decision making** - medium-scale solar projects are likely to attract significant local interest. Unlike DCO examinations, where decisions are ultimately made by the Secretary of State, local planning applications are often determined by planning committees, increasing exposure to local campaigns, political pressures and the potential for decision-making that departs from officer recommendations.



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Quick thought on NSIPs yesterday and today - How does the new TCPA route compare?

Before the threshold change, developers of projects exceeding 50MW had little choice but to enter the DCO regime. While the DCO process provides certainty, statutory timescales and a national policy framework, it is also resource-intensive and costly.

At the same time, the Government has introduced a series of reforms aimed at streamlining the NSIP process, reducing delays and improving decision making for nationally significant infrastructure. Consequently, developers considering schemes above 100MW may find that the gap between local planning and the DCO regime is narrowing.



The key strategic question for developers is therefore whether to pursue a medium-scale scheme through local planning or seek to maximise generation capacity and pursue a larger NSIP project.



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The current political landscape

What implications does this have on the promotion of medium scale solar projects through the local planning system following NSIP threshold changes for solar projects?

NSIP threshold changes have been met with broad political support from local authorities wanting more of a say in planning outcomes for renewable energy projects. The Local Government Association, for example, cited that the change would “ensure local viewpoints are fully considered” in their [response to the Ministry of Housing, Communities and Local Government’s 2024 consultation](#).

Such changes come, however, as the political and public consensus around net zero and clean power 2030 is fraying. Reform UK – the main political opposition towards net zero – now leads 26 local authorities and has held a consistent national poll lead since March 2025. The similarly hardline positions from the Conservative Party, including [repealing the 2008 Climate Change Act](#), and even [growing scepticism from some Labour MPs](#) mean TCPA applications are more vulnerable to political pressure than ever.

Even still, the ascendance of Reform UK has not yet made a discernible impact on the number of consented projects or the speed of decision-making. Research from Alpaca Communications shows that since the 1st May 2025 local

elections, only eight solar farm planning applications have been refused by Reform UK-controlled unitary and metropolitan councils compared to 66 solar farms which have been granted planning permission.²

Much of this can be attributed to the fact that these planning applications are being submitted in the context of a more favourable policy environment at the national level that the Labour government is advancing at pace. Changes to the National Planning Policy Framework, the streamlining of appeals process for applicants, the incoming national scheme of delegation and threat of special measures have made it harder for planning committees to refuse consent for renewable energy projects.

Developers with a Gate 2 offer may yet feel it is more expedient to submit a sub-100MW TCPA application before potential upheaval in a 2029 General Election, when a new right-wing government could seek to undo these reforms. Yet with more local authorities trying to insulate themselves from Labour’s national policies through measures such as blanket bans on solar on BMW (“best and most versatile”) land, and repealing climate emergency declarations, the situation remains uncertain.

² Three in County Durham, two in Sandwell Council, one in Wakefield, one in Walsall and one in North Northamptonshire have been refused planning permission.

Source: [Renewable Energy Planning Database: quarterly extract \(April 2026\)](#)



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Our joint overarching reflections

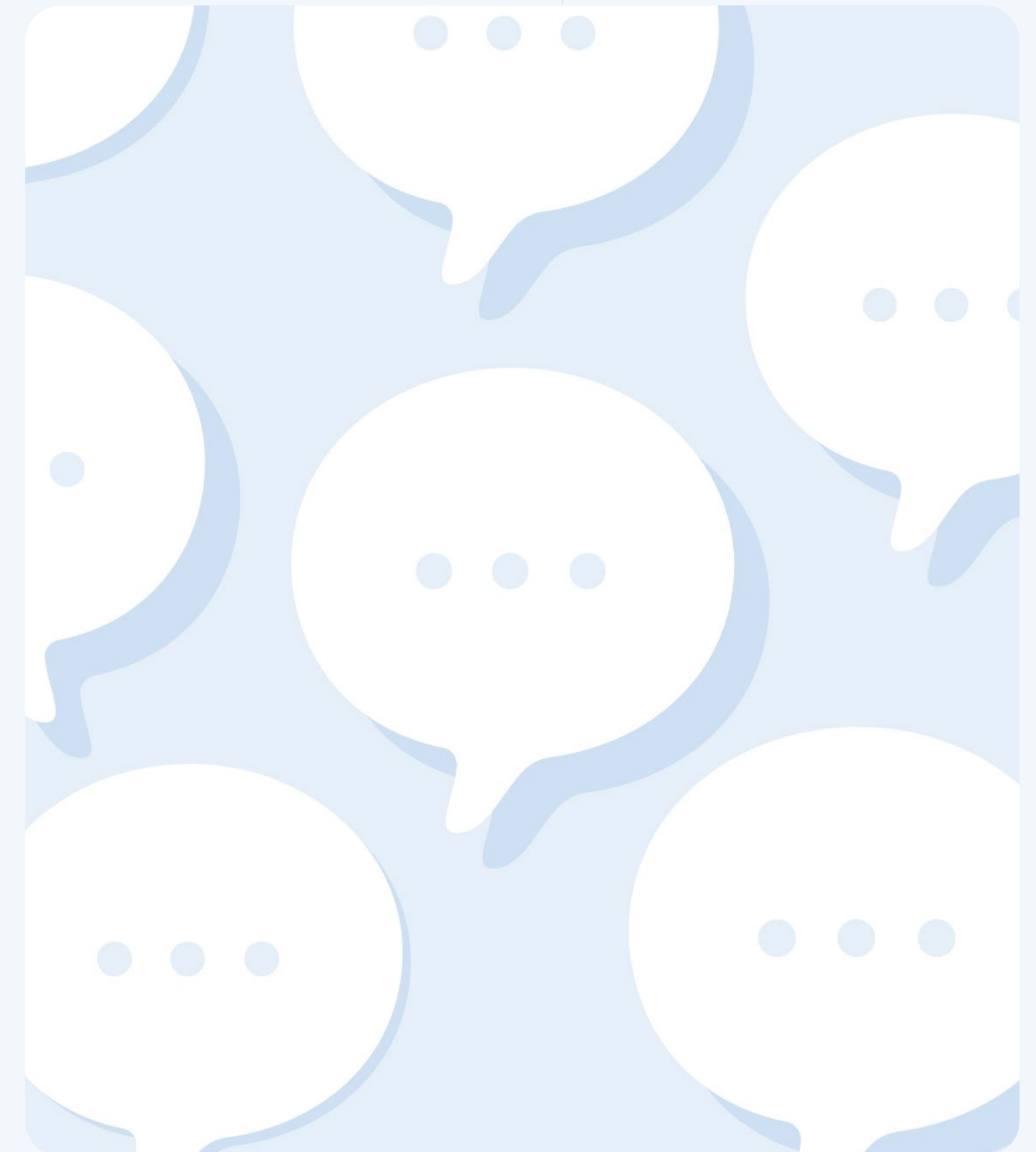
On the opportunities and risks for medium scale solar developments that are seeking to gain consent through the TCPA consenting regime

Preceding sections of this piece look at the headline opportunities and risks associated with promoting a solar project between 51-100MW via the local consenting route, through a comparison with the previous system where solar projects of this size required consent through the DCO consenting regime.

At a glance the main opportunities of the new threshold and pursuing these projects through a local consenting route would appear to be:

- Reduced costs
- Shorter timescales
- An increased ability to tailor projects to meet available grid capacity and the site-specific planning and environmental constraints without necessitating entry into the resource intensive NSIP process.

However, taken at surface level this somewhat hides the complexity of solar projects at this scale, closer attention is paid to the main opportunities and risks associated with each of the primary consideration factors for solar schemes promoted through the local level consenting regime on the next few pages.





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Costs

A prospective applicant still risks high costs through the local consenting route. Paragraph 2.10.9 of EN-3 (the National Policy Statement for Renewable Energy) makes it clear that a solar farm currently requires between 1.6 and 2.25 hectares (4-5.6 acres) for each MW of output. At the lower end of the scale a 51MW solar farm developed with the minimum land requirement of 1.6 hectares per MW requires 81.6 (51x 1.6) hectares of land. At the higher end of the scale a 100MW solar farm developed at 2.25 hectares per MW requires 225 hectares of land.



Based on the planning fees payable to local authorities alone, assuming a project submitted to a single local authority, an **81.6-hectare solar scheme** would attract a planning fee of **£182,805.00** (£182,714.00 plus a planning portal fee of £91). A **225 hectare solar scheme** would attract a planning fee of **£427,628** (£427,537 plus a planning portal fee of £91).

This represents a significant investment and ignores any other costs associated with the preparation, submission and determination of a planning application submitted through the local consenting route.



Under the previous DCO system the industry norms for full consent costs were typically approximately **£750,000 - £2million** at the **81.6-hectare scale** or **£2-5 million** at the **225-hectare scale**.

Overall, however, whilst there are still significant planning fees and associated costs payable for 50-100MW solar farms pursuing a consent locally, it would appear that locally consented solar farms at the medium scale would typically attract a lower level of overall cost than promoting a medium scale solar scheme via the NSIP consenting regime.



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Timescales

Timescales are unproven as yet as being quicker than the NSIP through the local consenting route, given that each project submitted through this route are in the early stages in consideration.

In theory a locally consented solar project particularly where a Planning Performance can be agreed with the local authority should offer a quicker route to consent than the DCO process.

A statutory determination timescale for a major planning application requiring EIA is 16 weeks. Although in reality for large projects local authorities often exceed these timescales due to resourcing constraints. If approved, first time experience suggests that they projects can be consented in a 12-18 month timescale.

The risk of a solar scheme going to appeal also needs to be taken into account in timescale considerations which is often contingent on the local political landscape. An appeal would typically take between a further 6-18 months.

Prior to the DCO threshold changes, Solar NSIPs were typically being developed through the pre-application stage of the DCO process for two to three years prior to their formal submission into the more fixed stages of the NSIP process through to ministerial decision which typically took 13-14 months. As such solar projects seeking consent via the NSIP process have typically taken three to four and a half years in total.

A direct comparison on the consenting routes for solar projects and typical consent timescales is offered below.

Route	Typical consent timescale
Local Planning (approval first time)	12-18 months
Local Planning (refusal + appeal)	18-30 months
DCO	3-4.5 years

Overall, medium scale solar farms promoted via the local consenting route would appear capable of achieving consent with a shorter timeframe than medium scale solar projects previously promoted via the NSIP process. However, in the instance of significant local opposition to a solar scheme which increases the likelihood of planning appeal the differences between the two consenting regimes narrow. Albeit the typical timescale for a refused planning application and subsequent win at appeal still typically remains quicker than securing consent for a medium scale solar projects via the NSIP consenting process.



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Alignment with grid connection offers and design flexibility

One of the most significant benefits arising from the increase in the NSIP threshold is the greater ability for developers to align project design with available grid capacity and site-specific constraints.

Under the previous 50MW threshold, developers receiving grid connection offers above 50MW were often forced to either constrain schemes to remain below the threshold or enter the significantly more costly and time-consuming DCO process. The new 100MW threshold allows developers to bring forward projects that more closely reflect available network capacity, whether that is 60MW, 75MW, 90MW or 99.9MW, without immediately triggering the NSIP regime.

The increased threshold also provides greater flexibility to optimise schemes around environmental constraints, agricultural land classification, landscape considerations and commercial viability rather than an arbitrary planning threshold. However, developers may remain cautious about designing projects too close to the 100MW limit where there is uncertainty around final export calculations and design evolution during the planning process.

Consequently, some developers may still choose to retain a degree of headroom within project designs to ensure they remain within the TCPA consenting route throughout the development lifecycle.





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Political landscape considerations

Without doubt, promoting a medium scale solar through the TCPA consenting provides greater exposure to local politics than the NSIP process and the unique challenges associated with messaging around renewable energy schemes promoted at a local level.

As highlighted by Alpaca Communications, local authorities have welcomed the chance to have more of a say in the decision-making process for solar farms up to the 100MW scale.

Yet amongst some voters' renewable projects have become increasing unpopular, as the political and public consensus around climate change associated targets such as clean power 2030 and net zero wanes.

Anti-renewable energy associated political parties are increasingly in charge at local level. However, there is a complicated picture emerging. The evidence suggests that the unpopularity of renewable energy and climate change within local authorities controlled by anti-renewable energy political parties has not as yet had a very significant impact on the number of schemes refused by these authorities. The majority of these schemes are still approved. Though whether this changes following wins by anti-renewables parties at May's local elections remains to be seen.

Accordingly, there is still a great deal of uncertainty for medium scale solar farms pursuing consent via a local planning authority – with the wider impacts of broad political change against national planning reform still emerging. Either way, political considerations will remain inherently intertwined with cost, timescale and design considerations for each individual project.





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Our Conclusions

Six months on, the increase in the solar NSIP threshold appears to be achieving its primary objective of opening a route to consent for projects that previously sat within the industry's "solar dead zone". Early applications suggest developers are willing to utilise the new regime and test local authority appetite for schemes approaching 100MW.

However, the first wave of projects also demonstrates that these remain complex infrastructure developments rather than conventional planning applications. While developers may benefit from reduced consenting costs and greater flexibility, they also assume greater exposure to local political dynamics, committee decision-making and resource constraints within planning authorities.



The success of the reform will ultimately depend not simply on the number of applications submitted, but on whether local planning authorities can determine medium-scale solar projects consistently, efficiently and in a manner that provides sufficient confidence for long-term investment.



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How Frankham X Alpaca Communications can help?

Whilst the introduction of the new 100MW threshold creates significant opportunities for developers, landowners and investors seeking to bring forward medium-scale solar projects.

What the above analysis highlights is that medium scale solar farms still represent significant investments and complex projects that benefit from access to the best advice possible.

Frankham Group can provide planning and consenting support for medium scale solar farms throughout a project's planning and development lifecycle, while Alpaca Communications can help developers engage effectively with communities, stakeholders and decision-makers.

Together, we help clients navigate the evolving planning and political landscapes, manage project risk and maximise the prospects of achieving successful planning outcomes.

Planning support for renewable energy projects at Frankham is led by Alex McCombie contactable via: alex.mccombie@frankham.com

Should you be seeking political insights and/or community engagement support on your solar project please contact Alpaca Communications via: alex.rowntree@alpacacommunications.com

