

16/10/2026

Kirklees Metropolitan Council
Planning Services,
PO Box 1720,
HUDDERSFIELD,
HD1 9EL

Dear Sir/madam

Discharge of Condition 25 - External Lighting Strategy

Planning permission: 2021/62/93644/E, dated 24th August 2022

Site: Low Farm, Wakefield Road, Flockton, Huddersfield, WF4 4BB

Development: Erection and operation of grid-connected solar photovoltaic farm to supply up to 49.9MW, with ancillary infrastructure and landscaping and biodiversity enhancements.

Applicant: Low Farm Solar Project Limited

We write in respect of the above planning permission to request the discharge of Condition 25, which requires an External Lighting Strategy to be approved in writing prior to the installation of any permanent and fixed external lighting.

The development comprises two areas. The “Solar Area” comprises the solar photovoltaic arrays and their ancillary infrastructure. The “DNO area” comprises the 132kV substation compound (including any control building within it) through which the development will connect to the distribution network, and which will be adopted and operated by Northern Powergrid as distribution network operator (DNO).

There will be no permanent external lighting in the Solar Area. External lighting will be provided in the DNO area, because it is required by Northern Powergrid. This letter explains the position in each area and sets out the External Lighting Strategy for the DNO area.

The Solar Area

The Solar Area does not include any permanent external lighting. There is no operational requirement to light the Solar Area during night-time hours, and no external lighting is proposed within it. The only lighting associated with the equipment will be minimal, low-intensity and directed internally within the plant area, with no potential to cause light spill or visual impact beyond the site boundary.

The site is located in a rural setting, with minimal nearby settlements or urbanised areas and only scattered residential properties in the wider surroundings. As no external lighting is required or proposed in the Solar Area, and as the limited equipment lighting will not be visible from outside the site, there will be no change to the existing baseline conditions as a result of the Solar Area and no potential for glare, sky glow or illumination of nearby receptors from it. The objectives of Policies LP24, LP30 and LP52 of the Kirklees Local Plan and Chapters 13 and 14 of the National Planning Policy Framework are therefore met in full in the Solar Area, wholly unlit conditions being the most protective outcome for visual amenity, residential amenity, ecology and the openness of the Green Belt.

Downing LLP is authorised and regulated by the Financial Conduct Authority (Firm Reference No. 545025).

Registered in England No. OC341575. Registered Office: 10 Lower Thames Street, London EC3R 6AF

The DNO area

The 132kV substation compound will be adopted and operated by Northern Powergrid. Northern Powergrid's policies set the security provisions that the substation design must adhere to, so that Northern Powergrid will meet its duties under the Electricity Safety, Quality and Continuity Regulations 2002 and the Occupiers' Liability Act 1996. The lighting in the DNO area is therefore an operational and security requirement of the network operator rather than a discretionary feature of the solar development, and unlike the Solar Area it cannot be omitted.

Northern Powergrid's policy IMP/002, Policy for Security Measures at Major Operational Sites (Version 1.1, February 2005) sets the minimum-security provisions for new major substations, which include primary substations, supply points and grid supply points. In relation to lighting, the policy provides that:

- exterior lighting is provided to illuminate all external access doors from dusk to dawn, either switching on automatically when a person approaches or providing illumination at all times during the hours of darkness;
- sufficient lighting is installed to illuminate the compound area, with lamp columns of the collapsible type located so as not to breach safety clearances;
- lighting components are vandal proof or protected against vandals, and positioned to minimise third party interference; and
- the control of lighting depends on the site risk assessment and substation type: PIR operated at low risk sites, and photoelectric (dusk to dawn) operated at higher risk sites, with the threshold varying by substation type. At outdoor 132kV substations photoelectric control applies at medium and high risk.

Where a pulse electrified fence is installed, the policy also requires it to activate the compound lighting.

Northern Powergrid's design guidance for primary and supply point substations (NSP/007/011, Guidance on Substation Design: Heating, Lighting and LV Supplies for a primary Substation, Version 2.0, May 2025) sets out detailed lighting provisions for substations, which will inform the design of the DNO area. In summary:

- building exterior lighting is provided by 230V, IP65, vandal-resistant, low-energy LED fittings, with a floodlight over the control room access door;
- where a building floor level is more than 750mm above ground, additional emergency-type floodlights illuminate external stairs and landings, controlled by a photoelectric cell or PIR sensor;
- compound lighting provides a general background average illuminance of 20 lux, in accordance with HSG38, using LED, IP65, vandal-resistant floodlights switched from inside the substation;
- compound lighting is wall mounted where possible and, where necessary, supplemented by hinged column-mounted floodlights not exceeding 3m in height; and
- in locations at risk of vandalism, compound floodlights are fitted with protective covers.

The lighting is therefore limited to the external doors, any external stairs and landings, and the substation compound itself. It is mounted at low level, with columns not exceeding 3m, and is designed to a modest average illuminance of 20 lux, which is consistent with the aims of Condition 25. The substation type and risk rating for the DNO

area have not yet been confirmed, and the number, location and control of the luminaires will be fixed by Northern Powergrid's detailed design within the parameters set out in this letter.

Response to parts a) to f)

Each part of the condition is addressed below for both areas.

Part	Requirement	Solar Area	DNO area
a)	Hours of operation of the lighting.	Not applicable – no permanent external lighting is proposed and there are no hours of operation.	Dusk to dawn only, in accordance with Northern Powergrid's policy. Lighting at external access doors and in the compound is either PIR-operated (on detection of movement) or photoelectric-cell operated, depending on the risk rating Northern Powergrid assigns to the site. The lighting is not operated during daylight hours.
b)	Location and specification of all luminaires.	Not applicable – no external luminaires form part of the Solar Area.	Locations: over the external access doors (including a floodlight over the control room access door), at any external stairs and landings where the floor level is more than 750mm above ground, and within the substation compound. Specification: 230V, IP65, vandal-resistant, low-energy LED fittings. Compound lighting is wall mounted where possible, supplemented where necessary by hinged columns not exceeding 3m in height. The number and exact positions will be fixed in Northern Powergrid's detailed design.
c)	Design level of maintained average horizontal illuminance.	Not applicable – no part of the Solar Area is proposed to be illuminated.	General background average illuminance of 20 lux across the compound, in accordance with HSG38.
d)	Predicted vertical illuminance at windows of nearby properties.	Not applicable – vertical illuminance at all surrounding windows remains at existing baseline levels, with no measurable increase.	The lighting is low level, low intensity and contained within the substation compound. The detailed design will include a calculation of predicted vertical illuminance at the nearest properties and will be designed so that it does not exceed the recommended maximum in Table 2 of the Institution of Lighting Professionals guidance referred to in the Council's informative, for the relevant Environmental Zone.

Part	Requirement	Solar Area	DNO area
e)	Measures to minimise glare and stray light beyond the boundary.	Not applicable – no light source capable of producing glare, sky glow or stray light beyond the boundary is proposed. Integral equipment indicators are low intensity, internally directed and enclosed within the plant area.	Luminaires are mounted at low level (wall mounted or on columns not exceeding 3m) and directed into the compound. The detailed design will minimise glare and stray light beyond the boundary, in line with the ILP guidance above.
f)	Methods of switching and controlling the lighting.	Not applicable – there is no external lighting installation to switch or control.	Compound and exterior lighting is switched from inside the substation entrance door and labelled accordingly (“Exterior lights” and “Compound Lighting”), with PIR or photoelectric control as described at a) above. Floodlights serving external stairs and landings are controlled by a photoelectric cell or PIR sensor.

Trigger of the condition and future control

Condition 25 is engaged by the lighting in the DNO area, and this letter is the External Lighting Strategy for it. External lighting in the DNO area will be installed only in accordance with the strategy as approved. Should Northern Powergrid’s detailed design depart materially from this strategy, for example in the type of luminaire, the illuminance or the nature of the controls, an updated strategy will be submitted to the Local Planning Authority for approval in writing before the lighting is installed.

We accept that the final sentence of the condition remains binding, namely that no other fixed external lighting shall be installed. The Solar Area will remain unlit, and any future lighting there would first require a strategy addressing parts a) to f) to be submitted to and approved in writing by the Local Planning Authority. The Council therefore retains full control over any future lighting proposals.

Request

We respectfully request written confirmation that Condition 25 is discharged, on the basis that the Solar Area will operate without any permanent external lighting and that the External Lighting Strategy for the DNO area is as set out in this letter. Please contact me using the details below should you require any further information.

Yours faithfully,

Torran McMillan

Senior Project Manager

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