



Our reference: 23/01423/PREAPP

Please ask for: Amanda Broadhead

Email Address:

██████████@bassetlaw.gov.uk

15th May 2024

Email address:

[oneearthsolar@planninginspectorate.gov.uk](mailto:oneearthsolar@planninginspectorate.gov.uk)

Dear Sir/Madam

**Ref: ONE EARTH SOLAR FARM DEVELOPMENT CONSENT ORDER (DCO) RELEVANT REPRESENTATION FROM BASSETLAW DISTRICT COUNCIL**

I refer to the notice of acceptance published by the Planning Inspectorate (PINS) in relation to the application to consider development consent order for the proposed One Earth Solar Farm which would comprise the construction, operation (including maintenance), and decommissioning of solar photovoltaic (PV) arrays and battery storage, together with associated infrastructure and an underground cable connection to the proposed National Grid High Marnham Substation.

Bassetlaw District Council (BDC) is a host local authority for the project and as such BDC is an interested party for the purpose of the examination of the project and the following is Relevant Representations made by BDC identifying the key issues submitted under Section 56 of the Planning Act 2008.

The Council adopted the Bassetlaw Local Plan: 2020 – 2038 on 29<sup>th</sup> May 2024, which superseded the Bassetlaw Core Strategy (2011). There are no made neighbourhood plans within the proposed site location. As such, all references to the Core Strategy and Draft Bassetlaw Local Plan Main Modifications (August 2011) are not relevant and should be removed. Only relevant references to the adopted Local Plan should be included.

Additionally, Chapter 7 should reference the Strategic Flood Risk Assessment Level 1 Update (August 2021), as the most up to date SFRA for the district.

Cumulative impacts:

The Council considers that there are inconsistencies within Appendix 18.2. There are several planning applications listed with the incorrect planning application reference number, for example:

- ID 61 states application reference as 148023, this should be 24/00033/FUL.
- ID 60 states application reference as 148024, this should be 23/00748/HAZ.
- ID 55: 24/00717/SCR decision was granted on 13<sup>th</sup> November 2024.

For transparency we would request these are re-visited

### **Biodiversity**

Bassetlaw District Council's Lead Ecologist has been consulted on the Biodiversity Chapter and relevant appendices of the Environmental Statement (ES) and is in agreement with the comments included in the relevant representations made by Nottinghamshire County Council.

### **Land and Soils**

Whilst it is acknowledged that the proposal would be operational for a period of 60 years, The District Council are concerned that within the Order limits, the proposal would see a total loss at 53.3% of surveyed land classified as BMV agricultural land. Given that some infrastructure, for example cabling, would be permanent and remain in place after the decommissioning period, some loss of BMV agricultural land would be permanent. There are a significant number of solar farms, BESS Facilities and screening opinions currently being considered and consented by this Local Planning Authority together with DOC consent awarded to other NSIP's within the administrative area. Other NSIP schemes are also under consideration such as Steeples renewable project (awaiting acceptance stage) and the National Grid upgrade (pre-app stage). As such, the cumulative impact of the potential loss of BMV agricultural land should be carefully considered.

### **Cultural Heritage**

In relation to the area in Bassetlaw, there are a range of heritage assets within close proximity to the proposal. There will be an impact of the project on the setting of built heritage assets and this will be discussed further in the local impact report.

### **Landscape and Visual Impact**

Visual Impact Assessments have been carried out on behalf of Bassetlaw District Council by Nottinghamshire County Council. More detailed study of the full submission will be included within the Council's LIR. Therefore, Bassetlaw District Council is in agreement with the comments made by Nottinghamshire County Council on this topic.

### **Transport and Access**

Nottinghamshire County Council (NCC) are the responsible Highway Authority and as such will be responding on this matter.

### **Air Quality and Human Health**

The Fire Authority has provided comments on the proposal previously and these are as follows:

- 1) The Fire Authority ask that the above Grid Scale Battery Energy Storage System Guidance (produced by the National Fire Chiefs Council [NFCC]) is provided to the developer. It is the content of which and any other relevant standards (e.g. NFPA) that the Fire Authority will seek assurances against. If that guidance is not to be met then detailed expert evidence and or technical data will be requested to justify such deviations.

- 2) The Fire Authority notes that within the documentation accessed on line there are several generic statements / observations of 'good intent' made by the developers with regards to the safety considerations for the BESS containers. However without the detail to substantiate these statements the Fire Authority cannot offer any further meaningful comments.
- 3) As such the Fire Authority reserve the right to consult further once that detail is known.
- 4) Although active fighting is mentioned in the information accessed on line, The Fire Authority is aware that the 'industry' is considering moving from extinguishment for fire incidents involving BESS containers, to 'burn out' and protect. This is based on advice from industry leading experts.

The Fire Authority seeks to clarify that the relevant enforcing authority for the protection of the environment (for example Environment Agency / Environmental Health / UK Health Security Agency) should be consulted. The relevance being that if this approach is not approved by that enforcing body, this may influence any subsequent risk management and emergency response plans detailing the requisite safety provisions expected for the site.

Whilst The Fire Authority does recognise burn out as a potential means to resolve an emergency of this type on site, it is not the role of the Fire Authority to authorise it.

The Fire service would also like to stress the importance of the provision of access, that being suitable safe access into and out of the site at all times irrespective of wind direction and incident location.

The District Council's Environmental Health Officer has provided the following comments:

There is an expectation that existing residential dwellings are protected from noise levels, from the day-to-day operation of the solar site from exceeding the noise levels detailed through BS8233:2014.

Volume 6 Appendix 15.4 Operational Noise Assessment 15.2.19 - further details on plant/mitigation will be required to ensure noise nuisance complaints do not arise from the operation of the solar farm.

Whilst the report provides baseline noise monitoring for the development site, the location/type of plant to be incorporated within the development has yet to be firmed up. However, I take some comfort from section 15.5.6 of the report where it is confirmed that noise levels from inverters/power conversation systems will not exceed the limits in the ES chapter and additional noise mitigation will be provided to ensure that this is the case.

In terms of the construction phase of the development:

Volume 6.0 Environmental Statement. Volume 2 Aspect Chapters. Chapter 15: Noise and Vibration Section 15.5.2 confirms that a CEMP is in the pipeline to prevent nuisance from the construction phase of the development. I look forward to reviewing the document in due course.

Volume 6 Environmental Statement. Volume 3 Technical Appendices supporting ES Volume 2. Appendix 15.3: Construction Noise and Vibration Assessment. Currently it seems that the development phase has the potential to give rise to nuisance complaints from existing

residents from trenching, construction of the access track, piling etc. Further details will be required on the specific techniques to be applied and likely mitigation to ensure that impact is reduced appropriately.

Pollution, Pollution Prevention & Control: -

Given the potential significance of these impacts, we urge the Secretary of State to ensure that a comprehensive Environmental Impact Assessment (EIA) is conducted, addressing the following specific concerns:

Dust during Construction:

The construction phase could generate dust, which could adversely affect air quality and the health of nearby residents. Measures to mitigate dust emissions, such as water spraying, dust screens, and monitoring, should be thoroughly evaluated and implemented.

Noise:

Construction and operational phases are likely to produce noise that could disrupt local residents. An assessment of noise levels, along with proposed mitigation strategies such as sound barriers and restricted working hours, should be included.

Glare from Solar Panels:

If the development includes solar panels, there is a risk of glare affecting nearby properties and road users. A detailed glare assessment, considering the positioning and angle of the panels, is essential to mitigate any adverse effects.

Historic Land Contamination:

The site may have a history of contaminative land use, raising concerns about existing land contamination. A thorough investigation into the extent of contamination, including soil and groundwater testing, may be necessary. Appropriate remediation plans must be developed to ensure the site is safe for its intended use.

Risk of Future Land Contamination:

The proposed development activities may introduce new contaminants into the environment. An evaluation of potential contamination sources and robust strategies to prevent future contamination should be an integral part of the EIA.

More detailed study of the full submission will be included within the Council's LIR.

## **Employment and Skills Delivery**

### **Introduction**

Bassetlaw District Council remains committed to promoting local employment, skills development, and inclusive economic growth. The One Earth Solar Farm Project presents a significant opportunity to embed these priorities into a major infrastructure development that spans multiple local authority areas including Bassetlaw, Newark and Sherwood, West Lindsey, Lincolnshire County, and Nottinghamshire County Councils. Given the scale and complexity of this development, the Council strongly encourages the adoption of a comprehensive Employment and Skills Plan (ESP) managed collaboratively across all involved authorities.

Bassetlaw continues to experience entrenched challenges regarding skills attainment and inclusive employment. Qualification attainment at Level 4 and above remain below the national average, which restricts both economic growth and individual prosperity across the district. Tackling these challenges is a strategic priority for Bassetlaw District Council. The Bassetlaw

Local Plan 2020–2038, particularly Policy ST29, emphasises the vital role developers can play in promoting local employment and skills development and support the Council’s aim to grow a diverse, higher-value employment base supported by a skilled workforce.

As such, developers of major projects are expected to contribute meaningfully to this ambition through the delivery of robust Employment and Skills Plans (ESPs), creation of training opportunities, and collaboration with local stakeholders. To maximise social and economic benefits, it is vital to establish clear commitments to local employment and training, particularly given the short construction phase and long operational life of the project.

### **Construction Phase**

The development is projected to create up to 750 temporary Full-Time Equivalent (FTE) construction jobs over the two-year construction period, with up to 4,000 additional FTE roles within the wider value chain. While these opportunities are welcomed, the temporary nature of the construction phase requires careful planning to ensure meaningful skills development. Key considerations include:

- Prioritising local recruitment to maximise employment for residents of Bassetlaw and neighbouring districts.
- Ensuring the inclusion of apprenticeships and structured training programs, particularly in civil engineering, construction, electrical engineering, and power generation.
- Collaborating with local education and training providers to facilitate short courses, T-Level placements, and apprenticeships, mindful of the short duration of the construction phase.
- Addressing rural accessibility challenges for workers, particularly for those without private transport.
- Engaging with local DWP offices and employability providers to address economic inactivity and provide opportunities through Skills Bootcamps, SWAPs, and targeted training.

The Council expects all major projects to adopt the CITB National Skills Academy for Construction (NSAfC) Client-Based Approach, embedding workforce development into project delivery. Key construction-phase expectations include:

- Prioritisation of local labour through early supply chain coordination and labour brokerage
  - Short-term placements for NEETs, students, and adult learners (e.g. Skills Bootcamps)
  - Work experience and curriculum-aligned visits with schools and colleges
  - Creating Apprenticeship opportunities in construction and support roles
- Benchmarks for these expectations are detailed in Appendix 1 (Infrastructure Projects). To support KPIs and demonstrate commitment to inclusive and responsible operations, contractors are encouraged to register with the Considerate Constructors Scheme.

### **Operational Phase**

The operational phase will offer fewer direct employment opportunities, primarily in maintenance, land management, and technical roles. However, ongoing collaboration with local skills providers is essential to ensure that new roles are accessible and skills gaps are addressed proactively.

Establishing robust training partnerships early on will ensure long-term workforce readiness for the project’s 60-year operational life.

While opportunities will be fewer than the construction phase (and numbers of FTEs are not clearly expressed within the provided documentation) there will be valuable opportunities for:

- Local inclusive employment, especially among NEETs, people with disabilities, and other priority groups
- Apprenticeship starts and completions across technical and professional sectors
- Industry-recognised qualifications NEBOSH, CMI/ILM, BTEC’s etc.

- Training partnerships with Jobcentre Plus and local education and training providers

While roles new roles are welcome we would encourage further breakdown of what could be available either for entry roles / career changers, and if roles could be fulltime / part-time, permanent or temporary, and how they will be distributed across skill levels.

The planning documentation currently lacks detail on partnerships with local FE providers, training bodies, or employment support organisations. Stronger engagement in this area will help the developer promote inclusion and maximise impact.

Operational employment and skills expectations are outlined in Appendix 2, with Key Performance Indicators applicable from the point of opening and extending for a period of three years.

The developer should provide a breakdown of roles and confirm inclusion of structured development pathways (e.g. internal progression, qualifications) in their operator workforce plans.

#### ESP Recommendations

To ensure sustained local benefit, the Council recommends the developer adopt an ESP which includes:

- Clear targets for local recruitment and skills development, both during construction and operation.
- Specific commitments to apprenticeship starts and completions, including structured pathways for progression to higher-level qualifications.
- Engagement with local education providers to co-design relevant training and ensure pipeline continuity.
- Monitoring and reporting mechanisms to ensure transparent delivery against key performance indicators (KPIs).
- Regular collaboration with the host local authorities to adapt the ESP to changing economic conditions or emerging skills needs.

#### **Monitoring and Management of the Employment and Skills Plan**

To ensure accountability, Bassetlaw District Council expects the developer to commit to regular monitoring and reporting of progress against the ESP. Given the project's scale and its coverage across several local authority areas (Bassetlaw, Newark and Sherwood, West Lindsey, Lincolnshire County, and Nottinghamshire County Councils), it is crucial that the monitoring and reporting framework is designed to accommodate multi-authority oversight. Additionally, Bassetlaw District Council reserves the right to levy a monitoring and support fee to cover the costs associated with coordinating multi-authority engagement and oversight. Fees would be calculated based on weighted officer time plus oncosts to ensure the provision of effective support and compliance management.

The fee would cover

- Collection, review, and evaluation of data
- Ongoing technical advice and support
- Site visits and engagement meetings
- Brokering links with local education and training providers
- Coordination with the local authority lead Skills & Employment Boards / groups to connect stakeholders
- Delivery of careers events and wider social value activity

This approach ensures the plan delivers lasting benefits aligned with the Local Plan and supports inclusive growth in the district.

Quarterly updates should be submitted to the Employment and Skills Working Group, which must include representatives from each of the affected authorities to ensure a coordinated and collaborative approach. This collaborative monitoring will facilitate the consistent tracking of

employment, training, and skills outcomes, while allowing each authority to address any area-specific challenges in a timely manner.

### **Summary**

The development has the potential to significantly benefit local communities, but these benefits will only be fully realised through a proactive and collaborative approach to employment and skills planning. The Council strongly urges the developer to embed these principles into the project from the outset, fostering long-term socio-economic gains while supporting the transition to a sustainable energy future.

To achieve these benefits, the developer and their partners should:

- ☐ Commit to a CITB-aligned Employment and Skills Plan
- ☐ Prioritise local recruitment and inclusive hiring
- ☐ Deliver apprenticeships and structured in-work training
- ☐ Actively partner with schools, colleges, and job service
- ☐ Monitor and report delivery throughout construction and operation phases
- ☐ Agree to the monitoring fee to fund long-term oversight

The Growth and Economic Prosperity Team remains available to support the developer in shaping and delivering a plan that aligns with the district's wider goals for growth, inclusion, and place-based prosperity.

A full copy of these comments will be attached to this letter.

### **Cumulative Effects**

The submission includes an evaluation of cumulative effects. The planning process has seen the planning applications status updated during the consideration of this project. This matter will be fully re-visited during the Local Impact Report. However, there are a few key decisions that have been made or outstanding both adjacent and within the order limits.

The order limit includes a site that has secured hazardous substance consent for the proposed storage of a maximum of 4.9 tonnes of Hydrogen at land at the former High Marnham Power Station Fledborough Road High Marnham under planning reference 23/00748/HAZ. The Health and Safety Executive should be consulted on the proposal.

A resolution to grant planning permission, subject to a section 106 agreement, has been made at Planning Committee on 23<sup>rd</sup> April 2025. This proposal includes a Battery Energy Storage System, Substation, Associated Infrastructure and Works and considered under planning reference 24/01138/FUL at Crabtree Lane Energy Hub Land East Crabtree Lane. The proposed output of the development will be 1GW, with the capacity expected to be 4GWh (based on a 4-hour battery energy storage system). This development also includes a 400 kv substation.

A screening opinion is currently being considered under planning reference 25/00387/SCR for a BESS with a Storage Capacity of up to 400 Megawatts (MW).

The Local Planning Authority has not received a planning application to consider the National Grid substation at High Marnham.

It is recommended that the cumulative impact of these proposals and all the NSIP's within the area are considered. An updated list of planning applications and permission will be submitted within the Local Impact Report.

Draft Consent Order

As this is a cross boundary application site covering three local authorities, the Local Planning Authority request a period of at least 13 weeks to consider all applications to discharge conditions. Also that the proposed application fees reflect officers time spent reaching a decision on those matters.

### **Other Matters**

The following comments have been received from Dunham and District Parish Council.

Dunham and District Parish Council have concerns about the project as a whole, and are particularly concerned about the following areas that will affect residents of the parishes:

- The effect of the project on local residents' quality of life
- Cultural heritage, heritage and archaeology - especially the effect on listed buildings and community identity
- Landscape and visual effects
- Effects on wildlife
- How the project will alter the character of the public rights of way in the area
- Far Hill Lane public right of way application
- Accountability for the project in the future
- Lack of detail on the siting of aspects of the planned project
- Construction traffic and access
- Cumulative effects with other NSIP's and large-scale developments in the area
- Noise from the project in an otherwise tranquil area
- Human health, especially effects on mental wellbeing
- The lack of information from the developer on any proposed community benefit
- Hydrology, flooding, and water management
- Socio-economic impacts
- Battery energy storage systems safety and fire-fighting response
- Accountability for the project in the future

I can confirm Bassetlaw District Council wishes to attend the preliminary meetings and participate in the examination of the application.

Please note that the comments supplied in this Relevant Representations statement are made without prejudice to any views that may be expressed in the Council's Local Impact Report or representations made in the examination of the application.

Kind regards

Amanda Broadhead  
Major Projects Manager  
Planning Service  
Bassetlaw District Council