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Sent via email to
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16th September 2025

Dear Sir/Madam

**ONE EARTH SOLAR FARM DEVELOPMENT CONSENT ORDER EN010159 – NCC COMMENTS
ON RESPONSES TO LOCAL IMPACT REPORT AT DEADLINE 3 (16 SEPTEMBER 2025)**

Nottinghamshire County Council (NCC) (FD2E7A44C) notes that the applicant has provided comments on its Local Impact Report (LIR) which was submitted at Deadline 1 and that the Examining Authority (ExA) has requested comments on the responses from the applicant by Deadline 3. The purpose of this submission is to provide our comments on those responses as set out within the document titled 'Applicant Response to Local Impact Reports EN010159/APP/9.18'.

It should be noted that NCC is engaging with the applicant to agree a Statement of Common Ground (SoCG) covering key areas of disagreement and agreement relating to each of the matters discussed in its LIR. It is understood that a revised SoCG will be submitted at Deadline 4 (14 October 2025).

Issue	Reference	NCC Comments
Buried Heritage 5.2.2-5.2.22	LIR18- LIR32	NCC notes the applicant's response to these issues. Further discussion is taking place between NCC and the applicant with regards to the Outline Written Scheme of Investigation (OWSI). The position of NCC with regards to these issues and acceptability of the OWSI will be reported through the SoCG.
Biodiversity 5.3.3-5.3.53	LIR57- LIR93	NCC notes the additional information which has been submitted with respect to field surveys and environmental measures and has met with the applicant to discuss their response to the LIR. NCC's position on the issues will be reported through the SoCG.
Landscape and Visual 5.5.6-5.5.11	LIR103- 107	NCC notes the response from the applicant. All the outstanding matters and issues are still being discussed between the parties and were covered in detail at the Issue Specific Hearing 2 (3 rd September). Following Issue Specific Hearing 2 and in response to the actions arising, NCC has submitted a summary of its comments to the ExA, prepared by its advisors. NCC would refer the applicant to this document for a detailed update on this issue. The position of NCC will also be confirmed through the SoCG.
Transport 3.4	LIR126	Having reviewed the oPROWMP (EN010159/APP/7.12.1 Rev02) and Streets, rights of way and access plans (EN010159/APP/2.4 Rev 01), NCC is satisfied that there are no impacts on NCR 647 where it passes through/adjacent to the DCO area (and within the management of Nottinghamshire County Council); it is evident that the offroad section of the NCR is not to be crossed by construction traffic, which was our primary concern.

		Our only request is that at the western end of the NCR, where it leaves the disused railway line and joins the public highway, temporary signage should be installed by the developer to warn cyclists of the presence of construction traffic. This is the location annotated 07/22 and 07/23 on Sheet 7 of 16 of the Streets, rights of way and access plans. We would suggest that para. 3.1.3 of the oPROWMP is amended to include this specific provision.
Transport 5.6.3-5.6.35	LIR127	NCC acknowledges that additional barred routes have been included in the updated oCTMP following discussion with NCC, however no response has yet been provided on the justification for barring Ragnall, resulting in need for new junction on A57.
Transport 5.6.3-5.6.35	LIR130	NCC's concerns with regards to barred routes have all been addressed through the updated oCTMP with the possible exception of the A1133 to the south of South Clifton, detailed in response to LIR131 below.
Transport 5.6.3-5.6.35	LIR 131	<p>Whilst HGVs will not impact the settlement of Collingham as the applicant has addressed our initial concerns here by barring this route and explaining that the HGVs would only run between Besthorpe Quarry and the site, the percentage increase in HGVs to the south of South Clifton remains significantly more than is being presented. Paragraph A.12.4.27 of the Transport Assessment (TA) states that the data has been independently crosschecked against DfT traffic data and maintains that there are 792 HGVs south of South Clifton. This is contrary to DfT information, which identifies there are 320 (annual average) HGVs to the south of South Clifton: Road traffic statistics - Manual count point: 76031 Road traffic statistics - Manual count point: 76032 Road traffic statistics - Manual count point: 56346</p> <p>As per our previous responses, the increase in HGVs is therefore over 60% and the applicant should review the need for assessment on the route between Besthorpe Quarry and Sand Lane, Spalford on this basis. It is thought that addressing this is unlikely to require amendments to highway, but its exclusion means that this length of road would not be included in the Wear and Tear agreement (see response to LIR 150 and 151).</p>
Transport 5.6.3-5.6.35	LIR132	With regards to the additional barred routes, please note that the diagram of the barred routes is referred to in both the TA and and oCTMP as being in Figure 2 but are in Figure 4.1. The figure is helpful to identify potential routes missing and it would be beneficial to include routes leading to South Scarle in these.
Transport 5.6.3-5.6.35	LIR133 LIR134 LIR135	As per response to LIR131, whilst HGVs will not impact the settlement of Collingham, the additional HGVs may impact the smaller settlements along this route. It is not thought likely that addressing this omission would result in any amendments to highway being necessary, but the route will need to be considered in terms of Wear and Tear.
Transport 5.6.3-5.6.35	LIR138	The applicant understands the only access in contention to be the A57 for which an RSA1 is being prepared. However, this is not the case.

		<p>NCC had not had opportunity to fully consider any of the junctions as the previous TA did not have reference to details of the access junctions. This suite of drawings has subsequently been highlighted to NCC as being in APP-015. Please note that whilst it is stated that they are now included in Appendix B of the TA, this appendix does not contain the drawings.</p> <p>Whilst it is noted that the DCO allows for Road Safety Audits (RSA) to be carried out on the detailed design of the access points, the principal of acceptability is yet to be determined.</p> <p>NCC's policy within the Nottinghamshire Highway Design Guide (NHDG) is that new accesses for vehicles and the increased use of existing accesses on other classified and unclassified roads will normally be supported where there is not a road safety problem or where a road safety problem can be removed, thus the appropriate mechanism to determine this is considered to be through the RSA process.</p> <p>Notwithstanding this, to assist this process, NCC has given a preliminary view on the accesses in response to LIR 140, 142 and 143.</p>
Transport 5.6.3-5.6.35	LIR 138 LIR 139	NCC notes that a technical Note and RSA1 is to be supplied with respect to barring at Ragnall and the new access on A57. NCC is currently awaiting receipt of this information and will comment further in due course.
Transport 5.6.3-5.6.35	LIR 140 LIR 142 LIR 143	<p>Paragraph A.12.3.26 of the TA states that the access drawings are included at Appendix B, but no information is included here.</p> <p>It is however understood that the drawings in APP-015 are the access drawings, and it is these on which the following preliminary comments are made instead.</p> <p>As per our previous comments, the drawings are numbered and do not correspond to the alphabetic convention referred to in the TA/oCTMP, neither do they always correspond to the sequential numbers (whilst A=1, none of the other junctions follow this convention) so it would be helpful if the applicant review and reconcile this.</p> <p>The NHDG requires that the design and construction of works on classified roads and other roads (existing or proposed) not covered by the NHDG must normally comply with the 'Design Manual for Roads and Bridges'.</p> <p>However, DMRB requires that there are no relaxations or departures within 1.5 x stopping sight distance (SSD). The relevant standard would be SSD towards the junctions, but none of the drawings identify the SSD over 1.5 x SSD on approaches.</p> <p>Access 1 (Gate A) – The need for a ghost island in accordance with DMRB is queried as the construction peak period daily traffic flow shown in Table 4 of the TA exceeds that indicated as acceptable for a simple priority junction in Figure 2.3.1 of DMRB CD123. The swept paths should identify corresponding opposing</p>


		<p>movements on the same viewport. There appear to be conflicts between opposing movements.</p> <p>Access 3 (Gate H) – The referenced revised drawing is not available. The drawing included does not identify the point of access to the highway.</p> <p>Access 6 (Gate B) – this identifies vegetation management but would likely require hedgerow removal as the splay falls behind the highway boundary (hedge lines mark the boundary). As this falls outside of the highway boundary, how will the splays be secured for the lifetime of the development and how will the highway boundary be demarcated? Swept paths are shown to and from a barred route but the ones that would be required would conflict if shown on the same viewport.</p> <p>Access 7. It is unclear if this is the eastern arm of Gate B, but if so, it forms a stagger and should be shown on the same drawing to allow any interaction (including swept paths) to be considered.</p> <p>Accesses 11 and 12 are Gates I and J respectively. Both would have conflicting swept paths if opposing movements shown on same drawing.</p> <p>Access 13 (Gate D) – the swept paths are likely to conflict.</p> <p>Access 14 (Gate C) – swept paths conflict and should also be tested with the existing access to High Marnham. As the visibility splay falls outside of the highway boundary, how will the splays be secured for the lifetime of the development and how will the highway boundary be demarcated?</p> <p>Access 15 and 16 (Gate E) – The visibility splays conflict with 3.5m high solar panels which will obstruct that visibility. Crossroads are also an issue as there is a risk of failure to give way. How will this be managed?</p> <p>A common theme throughout the drawings appears to be an issue with the swept paths. Right turning exiting vehicles commence the turn prior to reaching the give way which means that this manoeuvre is being started prior to visibility being available. At the point that visibility is available, the cab of the vehicle would be at an oblique angle to the major road meaning that the driver may not be able to see vehicles approaching from the left. If the vehicle was at 90° to the give way at the point where visibility would be available, it would be in the path of an entering vehicle. It also appears that a right turning exiting vehicle would not be able to make the turn from the give way at a number of the accesses due to the narrowness of the road on to which it is turning. This suggests that the proposed accesses are not wide enough to accommodate all turning manoeuvres and/or that the roads onto which they turn do not accommodate the required manoeuvres and may need localised widening.</p>
Transport 5.6.3-5.6.35	LIR141	NCC notes the response regarding the Transport Assessment but has the following comments to make in relation to these updates.

		<p>Paragraph A.12.3.38 refers to details being submitted for works within the limits of road adoption. However, whilst unadopted, public rights of way are highway, and the same approval process should apply.</p> <p>The revised drawing for Gate H is not in Appendix B.</p> <p>How is the use of Access 8, 9 and 17 to be managed as all are accessible from the public road network. Is it intended that these are to be a permanent feature similar to the accesses?</p> <p>Access 9 identifies a visibility splay that crosses land outside of the DCO boundary. It is unclear therefore how this will be achieved. The drawing itself notes that speed surveys should be carried out to determine the required visibility splay therefore this should be carried out or the location of the crossing may not be appropriate.</p> <p>Access 17 shows hedgerow removal to accommodate the visibility splay. How will the visibility splay be secured for the lifetime of the development and how will the highway boundary be demarcated?</p>
Transport 5.6.3-5.6.35	LIR 144	The drawings identifying passing places on Crabtree Lane and Moor Lane have not been included in Appendix B of the Transport Assessment. However, an approach to their provision has been agreed with the applicant and those drawings seen by NCC appear acceptable.
Transport 5.6.3-5.6.35	LIR 145	NCC notes that all access points are designed to be permanent to allow for servicing in the operational phase. This would confirm the requirement for RSA1s to be carried out. If the 3 crossing points that cross public highway are also to be permanent, these should also be subject to RSA1.
Transport 5.6.3-5.6.35	LIR 149	NCC notes that the accident data is under review following discussion and a revised accident data set is to be available at Deadline 3. However, accident data should be provided to the Road Safety Audit Team to enable the audits to be carried out.
Transport 5.6.3-5.6.35	LIR 150 LIR 151	NCC notes the inclusion of a Wear & Tear Agreement in Section 4.7 of the oCTMP [REP1-055]. The Wear and Tear proposals appear to be acceptable, on the basis that the DCO secures them. However, the extents are not acceptable as 4.7.1 of the oCTMP states that this will be carried out on the study area road network. As identified in our response to LIR131, the A1133 to the south of South Clifton will see a significant increase in HGV traffic and should be included.
Waste Management 5.7.5 – 5.7.6	LIR 160	NCC recognises that the assessment determined the waste receptor sensitivity, landfill capacity, was very high and there was recognition that non-hazardous capacity could be reduced in the future. However, in paragraph B 2.2.4 of Appendix 2.3 Materials and Waste Impact Assessment states that new landfill capacity will be consented to replace what has been used up and so it is assumed that non-hazardous capacity will remain the same as the current baseline. NCC wished to raise that any new landfill capacity in Nottinghamshire would be difficult to obtain due to geological and ecology constraints, with this a similar issue

		<p>across many Waste Planning Authorities. The most likely scenario therefore would be that some landfill capacity may exist, but at a much limited capacity therefore demonstrating the need to develop recycling facilities for the solar panels.</p> <p>NCC welcomes the commitment to provide details of expected waste arisings, and of their proposed fate, from operation and decommissioning within the OEMP and DEMP, as well as the the insertion of a new section within the Outline CEMP which includes a commitment to provide an annual planning maintenance schedule. It is agreed that data and reporting on waste types and volumes will support regional waste planning and that waste mitigation measures will need to be updated through continued dialogue with other developers post consent.</p>
DCO 6.2	LIR168	NCC notes that the street works the Applicant needs to undertake pursuant to Article 8 of the dDCO are subject to the council permit schemes as confirmed by Article 9, and that provides a mechanism by which the council can have oversight of the programming of those works. This is welcomed by NCC.
DCO 6.3	LIR169	<p>It is noted that access junction works, and associated mitigation works on the public road network will be subject to a technical approval process under the terms of the oCTMP, which sets out the approval process and confirms that the cost of this process will be covered. This is welcomed by NCC and ensures that the LHA retains oversight. However, 3.2.6 of the oCTMP refers to details being submitted for works within the limits of road adoption. However, whilst unadopted, public rights of way are highway, and the same approval process should apply where public rights of way are affected.</p> <p>It is noted that the applicant has updated the routing and study area however there are outstanding matters relating to the A1133 to the south of South Clifton (see comments on LIR131).</p>
DCO 6.4	LIR170	NCC acknowledges that the power to undertake traffic regulation measures is not an unusual power to secure within a DCO and agrees that the undertaker should obtain the written consent of the traffic authority. However, NCC would seek clarity on the proposed procedure for consultation and approval of any TTRO and recommend that this is described within the oCTMP.
DCO 6.7	LIR172	NCC welcomes the application of the higher fee in relation to the discharge of Requirement 15 (CTMP) but maintains that this higher fee should also apply to the discharge of the Drainage and Surface Water Management Plan (Requirement 11) to ensure appropriate scrutiny and additional resource if necessary.
DCO 6.8	LIR173	NCC notes that the applicant has extended the timeframe for discharging requirements under the DCO from ten to twelve weeks, in light of concerns raised by the councils. NCC's position on this issue will be confirmed within the SOCG.

I hope that these comments are of assistance in the examination of the proposal. Please do not hesitate to contact me if you require any further clarity on any of the issues above.

Yours faithfully,

 MRTPI
Planning and Infrastructure Manager
Nottinghamshire County Council