

**One Earth ISH 2 Wednesday 3 September-Thursday 4 July 2025**

Summary of Verbal Representations from Newark and Sherwood District Council (NSDC)

The following comprises a summary of the verbal representations of NSDC at ISH2 on the 3<sup>rd</sup> and 4<sup>th</sup> September 2025. It is supplemented by additional comments as appropriate, where NSDC had further points to raise, but insufficient time was available within the hearings.

Landscape and Visual Amenity (Item 4 of the Agenda):

1. Under **Agenda Item 4 (i)**, in regard to the suitability of a 2km search area and a broader understanding of the effect on landscape character areas: We have not identified anything on Site or wider landscape that would contradict the statement made by the applicant that there would not be Significant effects of the One Earth scheme in isolation beyond 2km, and typically distance reduces the likelihood of Significant effects occurring. Therefore, we agree that a 2km study area for the One Earth scheme in isolation is appropriate.
2. In regard to landscape effects of the scheme in isolation, we agree with the applicant that there will be significant adverse residual (15+years) effects across the order limits of the site: meaning the identified adverse landscape effects upon all areas of the site are not able to be adequately mitigated. In our initial LVIA review as part of the LIR, we did query as to why at a published landscape character scale (with the order limits falling across several landscape character areas identified in published landscape character assessments) the findings of the LVIA appeared inconsistent, with some character areas not having significant effects with others judged as not significant. Subsequent meetings with the applicant along with a site visit have clarified the findings of the LVIA, and we agree that some of the identified character areas would not have significant effects due to there being limited above ground development directly affecting these areas.
3. Regarding the effect on wider landscape character areas affected by the site cumulatively with other schemes: The future landscape baseline is covered in LVIA paras. 11.4.147 and 11.4.148 and the development of solar farm projects in the area is acknowledged to be a factor in the future baseline, although this feels underplayed within the LVIA. This is a landscape undergoing extensive change to land-use, predominantly changing from agriculture to large scale solar development. While published character assessments do identify the power stations of Cottam and West Burton in the region, as well as presence of pylons and overhead lines, there is no identification of solar and BESS development at a local, district or national scale.

Solar development, particularly at an NSIP scale, will be a completely new element covering thousands of hectares, which will be introduced across the region at an unprecedented scale and pace. This will not appear as a natural evolution of this agricultural and rural landscape, but a rapid alteration, replacing extensive areas of agriculture with energy infrastructure. Large scale solar is a completely different element to two relatively small-scale power stations and isolated pylons and overhead lines.

4. Regarding cumulative landscape effects: as identified at the statutory consultation stage, we have concerns regarding cumulative effects on the landscape at a wider district and regional scale. The mass and scale of several NSIP energy projects combined has the potential to lead to adverse effects on landscape character over an extensive area across multiple published character areas. The landscape character of the region, across the Nottinghamshire and Lincolnshire County areas, will be altered over the operational period through an extensive area of land use change, and introduction of energy infrastructure in an area that is predominantly agricultural. While it is not suggested that agriculture will not remain as a defining characteristic, over a short period of time large scale solar will undoubtedly become a widespread characteristic in the region. Subsequently, we judge that solar development would be a key characteristic in any updates to published character assessments from local to national scale.
5. However, given the absence of a unified, county-wide landscape character baseline across Lincolnshire and Nottinghamshire, this presents a challenge when assessing cumulative effects over a strategic regional scale to consider all these energy projects. Therefore, an approach we are promoting is to extract common landscape attributes of the area from the multiple character area assessments that cover the region, enabling a reasoned, evidence-led baseline, and subsequently assessment, of cumulative landscape effects across the wider area. For example, across Lincolnshire and east Nottinghamshire: the Land Use is strongly rural and predominantly arable farmland; Field Patterns are predominantly medium to large-scale; the Topography has a predominantly flat to gently undulating landform; Perceptual Qualities are predominantly quiet and with a rural character and high levels of tranquillity; the Settlement Pattern is generally dispersed villages and market towns; Vegetation and Tree patterns are generally open with sparse or isolated tree or woodland cover; and there is generally a strong sense of openness, big skies, and long expansive views in relation to Views and Openness. Therefore across the region of Lincolnshire and east Nottinghamshire, based on these shared characteristics, large scale solar development and new energy infrastructure would create cumulative change of the landscape character through an extensive Land Use change, directly affecting the perceived openness, and rural tranquillity. We judge large scale solar, battery and energy infrastructure will subsequently become a distinctive key characteristic across the region as a whole.

6. Reference has also previously been made to the Joint Interrelationships Report from other, previous, NSIP DCOs, with the Joint Interrelationships Report from the Tillbridge examination provided at Appendix D of the Written Summary of Applicant's Oral Submissions at the Issue Specific Hearing 1 (ISH1) (REP1-077 & REP1-078) at DL1. We disagree with the findings of this report as visual effects relate only to "in combination views" where two schemes may be seen in the same view. The report does not consider sequential views of multiple schemes, nor does it consider landscape effects through extensive land use change, or perceptual changes through the introduction of above ground-built elements.
7. In respect of Action Point 1 from ISH2, NSDC were asked to '*provide national policy requirements for concerns on cumulative landscape impacts of solar schemes.*' In this regard we would refer to the following national policy extracts and related publications.
8. Firstly, we would refer to the Written Ministerial Statement on Food Security and Best and Most Versatile Agricultural Land as made on the 15 May 2024<sup>1</sup> which under the Heading of 'Addressing Cumulative Impacts States as follows:

*'While the total area of agricultural land used for solar is very small, and even in the most ambitious scenarios would still occupy less than 1% of the UK's agricultural land, we are increasingly seeing geographical clustering of proposed solar developments in some rural areas, such as in Lincolnshire. When considering whether planning consent should be granted for solar development it is important to consider not just the impacts of individual proposals, but also whether there are cumulative impacts where several proposals come forward in the same locality.'*

### **EN1 – Overarching National Policy Statement for Energy<sup>2</sup>**

#### **Section 4 – Assessment Principles**

*In considering any proposed development, in particular when weighing its adverse impacts against its benefits, the Secretary of State should take into account:*

- *its potential benefits including its contribution to meeting the need for energy infrastructure, job creation, reduction of geographical disparities, environmental enhancements, and any long-term or wider benefits.*

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<sup>1</sup> [Written statements - Written questions, answers and statements - UK Parliament](#)

<sup>2</sup> [Overarching National Policy Statement for Energy \(EN-1\) - GOV.UK](#)

• *its potential adverse impacts, including on the environment, and including any long-term and **cumulative adverse impacts**, as well as any measures to avoid, reduce, mitigate, or compensate for any adverse impacts, following the mitigation hierarchy. (Para 4.1.5).*

*The cumulative impacts of **multiple developments with residual impacts** should also be considered. (Para 4.2.12).*

*The Regulations require an assessment of the likely significant effects of the proposed project on the environment, covering the direct effects and any indirect, secondary, **cumulative, transboundary, short, medium, and long-term, permanent and temporary, positive and negative effects at all stages of the project**, and also of the measures envisaged for avoiding or mitigating significant adverse effects. (Para 4.3.3).*

### **National Policy Statement for Energy (EN3)**<sup>3</sup>

*The approach to assessing cumulative landscape and visual impact of large-scale solar farms is likely to be the same as assessing other onshore energy infrastructure. **Solar farms are likely to be in low lying areas of good exposure and as such may have a wider zone of visual influence than other types of onshore energy infrastructure.** (Para 2.10.94).*

*The Secretary of State will consider the landscape and visual impact of any proposed solar PV farm, taking account of any sensitive visual receptors, and the effect of the development on landscape character, together with the possible cumulative effect with any existing or proposed development. (Para 2.10.157).*

### **Guidance**

#### **Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment**<sup>4</sup>

*The applicant should **consult the relevant consultation bodies**, including local planning authorities, to ensure the shortlist produced is **comprehensive and accurate**. (Para 10 under Stage 2).*

9. NSDC consider that there are a number of references within NPS's as highlighted above relating to the need to undertake and carefully consider the cumulative effects of a project. Moreover, NSDC would also highlight the regulatory requirement to assess cumulative effects and as

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<sup>3</sup> [National Policy Statement for renewable energy infrastructure \(EN-3\)](#)

<sup>4</sup> [Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment - GOV.UK](#)

noted at ISH2, NSDC have had very limited consultation on the Applicant's approach to cumulative assessment, which conflicts with the guidance as referred to above.

10. Notwithstanding the policy references made above AAH have been appointed by NSDC to undertake an independent of Landscape and visual effects and the identified concerns have been made upon the assessment of landscape and visual effects identified in the LVIA chapter of the ES. This review has been conducted on behalf of NSDC to industry guidance, and that is what AAH have based their judgement upon as technical experts on landscape and visual matters.
11. Under **Agenda Item 4 (ii)**, regarding the landscape and visual assessment being based on a temporary period: We wish to clarify that comments made are in relation to the time period given for the ES and subsequently used for the assessments made within the LVIA chapter. Given the stated operational time of 60 years, a concern was raised regarding the assumptions of reversibility and duration. Having reviewed the sections relating to this from GLVIA3 and other related technical guidance, it is clear that this project is long term. Given that 60 years is comparable to at least two generations, there is some considerable strength to the consideration that this would amount to a permanent project, as opposed to a temporary one, especially considering the average lifespan of building design is circa 50 years. If deemed a permanent Development, which it is our position, this may have a bearing on the judgements of effects, as typically a temporary scheme may reduce the assessed magnitude of change. However, the applicant clarified at ISH2 that the LVIA assessment has not reduced the assessment of effects due to being either temporary or permanent, and therefore the judgement of effects is unlikely to change based on this.
12. Under **Agenda Item 4 (iii)**, regarding the assessment of the visual effects relative to static positions and sequential views, including an explanation of the routes where cumulative effects are considered to occur, and an understanding of how this may change any assessed effect: We maintain the position that the visual assessment does not fully align with guidance provided within LI *Technical Guidance Note LITGN-2024-01*, which has been appended to this summary for reference as requested at the ISH.
13. This clarification by the Landscape Institute clearly states that the focus of a visual assessment should be on visual receptors, with viewpoints being utilised to illustrate potential views. Section 6(7): "Assessing viewpoints or visual receptors?" clarifies:  
  
*"The focus of the visual assessment should be the visual receptors (i.e. the people as set out within paragraph 6.31. of GLVIA3). The purpose of viewpoints is covered at paragraph 6.19 (i.e. for illustration of the visual effects)."*

14. By only focussing on a static viewpoint for the assessment, this does not fully consider the experience of a receptor, such as a walker along a PROW, or driver along a road. The experience and effects will be different depending on the experience, such as traveling along a linear route. The visual assessment does not fully account for this, and if only relying on a static viewpoint and describing the existing view and change to that view, may underplay visual effects. Subsequently, it was agreed at the ISH the AAH identify any visual receptors where the assessed effect within the LVIA may be altered by considering this sequential visual effect. This will be further discussed with the applicant and subsequently included within the statement of common ground issued at DL4 to ensure the position is clear.
15. As an example, users of public bridleway NT/North Clifton/BW10 will have a varying experience along the route, as well as varying views of the Development. This receptor will have closer range, and likely clearer views of the Development while passing through the south eastern section of the Site, however their visual experience is only captured and described in one static view at Viewpoint 9, which is much further from the built elements than at other locations and subsequently may have been assessed as having a lesser effect.
16. Frequent sequential views would create a change to the experience of visual receptors as well as change the perception of character of an entire area – these do not necessarily need to be clear open views. Repeated views and presence of large scale solar would undoubtedly increase the susceptibility of receptors to changes in view through visual fatigue in which viewers experience a diminishing capacity to absorb or tolerate repeated or similar visual stimuli (solar development) along routes, eroding landscape character and increasing a broader perception of landscape industrialisation.
17. Cumulatively, with other solar schemes, as identified at the statutory consultation stage and within our ISH1 representation, we have concerns regarding cumulative visual effects which we judge will be an issue when experienced sequentially for visual receptors travelling through the wider landscape and experiencing several schemes across potentially several kilometres, albeit with gaps between the schemes.
18. GLVIA3 defines types of cumulative visual effect as either: Combined (in same view and not identified for OESF) or Sequential (which is our concern, and we judge these have not been fully considered). Table 7.1 of GLVIA3, regarding Sequential Cumulative visual effects states:  
  
*“Sequential: Occurs when the observer has to move to another viewpoint to see the same or different developments. Sequential effects may be assessed for travel along regularly used routes such as major roads or popular paths”*

19. We judge that the sequential effects would be felt throughout the area, with PROW users that are more visually susceptible to changes in their view, moving slowly and often engaging with the landscape attentively; Travel along these PROW presents successive experience with solar infrastructure, creating a sequential visual effect.
20. PROW users traveling along several rights of way have been identified within the applicants LVIA as having significant adverse visual effects at year 15 including National Cycle Network Route 647, Public bridleways NT/Ragnall/BW3, NT/Darlington/BW1, NT/Thorney/BW19, and NT/North Clifton/BW10 and public footpath NT/Ragnall/FP2. If users of these routes had previously, or would subsequently, travel on rights of way with views of other schemes (as identified in the LVIA's associated with these projects) the implication is that users would likely experience sequential cumulative adverse visual effects across two or more schemes, even at Year 15 when mitigation should have matured. Combined with road corridors like the north to south A1133 and A156 route, along with nearby lanes, this can form a coherent visual narrative of a rural area increasingly defined by clustered energy-infrastructure development. The A1133 and A156 north to south route passes close to the One Earth Solar Farm where visibility of the scheme and significant visual effects are identified. Further north along this route (along the A156), users also have Significant adverse residual views of Gate Burton, and potentially some views of Cottam, and West Burton solar projects.
21. Under **Agenda Item 4 (iv)** regarding the assessment of effects on residential receptors, the applicants process of assessing the effects on residential receptors is becoming clearer and the applicants have provided additional information at previous deadlines and through additional meetings and discussions which has assisted in answering some of our concerns, however we still feel information on specific assessment of residents is missing.

As was identified within the AAH LVIA review, included within the LIR's as an appendix, at chapter 6.8: *"we would anticipate that some residents may experience Significant adverse visual effects from several properties, and while it is generally unlikely that properties will reach the RVAT through the Development of a solar farm, it is not possible to understand this process or any findings as they have not been presented. It would be beneficial for the applicant to clarify their position in regards to RVAA and why the initial residential visual amenity surveys have not been presented to aid transparency."* This was also discussed at ISH 1.

22. Subsequently the applicant has provided additional information within Appendix F Residential Assessment and Design within the Written Summary of Applicant's Oral Submissions at ISH1 (REP1-077 & REP1-078) at DL1 to clarify this process and provide additional information. This includes 16 drawing sheets identifying the properties surveyed along with a summary assessment, including whether any properties were not visited. This is a useful update, and the

plans and information clarify that surveys and consideration has been undertaken, as well as providing evidence of an iterative design process and how residential amenity is considered.

23. Finally, Paragraphs have been added to the LVIA at DL2: 11.3.35 to 11.3.38, clarifying that the author judges that no properties would reach the Residential Visual Amenity Threshold. While we agree with this statement in principle, we cannot locate the individual assessment of each of these properties for us to review and check the applicants' findings – i.e. which properties have significant effects and at what phases.
24. Also, the additional information provided in Appendix F of ISH1 summary text is not linked to or referenced to the LVIA revisions. It is somewhat hidden away and not particularly accessible unless signposted to this information. We will work with the applicant through the SoCG to enable us to identify and clarify the individual residential assessments.
25. Under **Agenda Item 4 (v)** regarding the extent of mitigation offered, and how this is secured within the dDCO, and whether IPs agree this provides a sustainable solution: The Indicative layouts and associated landscape proposals provide the opportunity to establish areas of mitigation planting that will provide screening and integration of the scheme into the landscape but also provide for the creation of landscape assets and new habitats. However, the landscape mitigation strategy outlined in the OLEMP and Design Approach Document is high-level at this stage, to allow for flexibility in the detailed design stages, and we would expect at the detailed design stage the applicant develop detailed planting plans clearly showing the location and types of planting (species), as well as number, density and specification, along with planting details and specifications. The scheme must also be managed appropriately for the duration of the project.
26. Subsequently, we have reviewed the updated OLEMP [Rev 2 REP1-054] submitted at DL 1 and (Rev 3 REP2-056) submitted at DL 2 to review if our concerns identified previously had been appropriately addressed. In previous comments and review, we stated that the OLEMP must be explicit in regards to the landscape mitigation scheme and maintenance post any approval, and include: Provision of detailed planting proposals that must be approved by the relevant authority; Subsequently, a sentence has been added at 1.3.5 of the OLEM (Rev 3) that *"The LEMP will detail the location and extent of proposed planting by inclusion of planting plans and species lists."*
27. We wish to ensure that maintenance of all planting and ecological features be for the life of the project; Subsequently, the updated OLEMP includes the addition of paragraph 5.4.3, which clarifies that all existing and proposed habitats will be managed and maintained for the operational duration of the scheme. This is a key clarification: we expect that the planting and associated habitat be appropriately managed for the full duration of the scheme.



28. Regarding planting replacements due to failure to thrive or establish, or due to plants dying, the OLEMP has provision within the initial establishment period, however we still request a statement be added for unforeseen circumstances such as extensive plant dieback, or failure to establish. We suggest the following, to be reviewed and included within the OLEMP:

*“In the unlikely event of external factors causing significant losses to the mitigation planting during the lifetime of the Project such that the purpose of screening the development is no longer achieved as a result of gaps in the planting, replacement planting will be undertaken to infill gaps that may arise. This approach will ensure commitments are fulfilled in respect of providing screening of the scheme and enhancing biodiversity”*

29. Finally in respect of arboricultural impacts, we remain concerned that the Applicant has not undertaken a stage 2 Impact Assessment, with regard to the proposed development. It remains that broad powers are sought within the Draft DCO on mitigation measures, without a proper assessment of trees, within the order limits.

Agricultural land and Best and Most Versatile Land (BMV) (Item 5 of the Agenda):

30. Under **Agenda Item 5 (i)** NSDC consider that there is no clear understanding of the loss of BMV land within the NSDC area, given the BMV assessment is based upon all such land within the order limits, which lies across three district areas within Nottinghamshire and Lincolnshire. NSDC note that that in their Deadline One submissions, the Applicant refers to the approximate amount of BMV land within the counties of Nottinghamshire and Lincolnshire, again providing an approximation of the loss of BMV land within the order limits, relative to the area of such land at the county level.
31. NSDC consider that a proper and robust assessment of cumulative BMV loss, should follow a ‘bottom up’ approach, whereby such loss is considered at a district level, capturing NSIP and TCPA projects and subsequently considering across the local authority areas to present a clear picture within the wider context of County areas. It is noted that the Applicant agreed to provide this further information, and this forms Action Point 6 from ISH2.
32. Action point 7 for ISH2 is directed to NSDC and states ‘*Provide national policy reasoning for BMV impact at district level.*’ In respect of this point, our representations on this issue sought to follow through with the way that **Agenda Item 5 (i)** was worded in that it referred to the effect on the ‘*local area.*’ Whilst we can find no specific reference to the national policy reasoning for BMV impacts at district level, the NPS’s are not exhaustive in their content, and we consider this issue is very important in respect of the proper understanding of cumulative impacts and the Applicant’s obligation to explain clearly and with transparency the nature of these impacts and the resulting effects.

33. As such, in respect of BMV land, we consider that much of the general policy references referred to within Paragraph 7 on cumulative impacts are equally relevant to the issue of BMV land also and in any event, we note that the Applicant has in any event agreed to provide further information, which forms an output from Action Point 6 of ISH2. NSDC look forward to reviewing and commenting upon this information when the Applicant provides it.
34. Turning to **Agenda Item 5 (ii)**, NSDC would add to its verbal submissions at ISH2 and note the context set by NPS EN1 which states the following at Paragraphs 5.11.12 and 5.11.34 respectively:
- ‘Applicants should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5).’*
- ‘The Secretary of State should ensure that applicants do not site their scheme on the best and most versatile agricultural land without justification. Where schemes are to be sited on best and most versatile agricultural land the Secretary of State should take into account the economic and other benefits of that land. Where development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.’*
35. As noted at ISH2, NSDC consider that limited spatial information has thus far been made available by the Applicant within the ES and the Site Selection Report (Appended to the Planning Statement) which focuses upon the explanation of the constraints considered and the methodology followed to reduce the impact on higher value BMV land. There is no clear information on alternate areas considered and dismissed that may be on lower value 3a and 3b BMV land. Given the policy tests as referred to above, NSDC consider the Applicant has not provided sufficient evidence on minimising the impacts on BMV land, nor have they provided sufficient justification for the extent of higher value BMV loss. Further to this, NSDC consider the BMV land to be occupied by the proposed development would be permanently lost, for reasons already set out under landscape and visual matters, within this written summary.
36. Finally, in respect of **Agenda Item 5 (iii)** NSDC have noted that the Applicant is to detail the soil health benefits, how these will be measured and quantified, (perhaps linked to a suitable pre construction schedule of condition to demonstrate the stated long term soil health benefits of the scheme) and how the benefits will be maintained post decommissioning, in order to illustrate that they are ‘sustainable’ benefits. Again, we look forward to reviewing this further information in due course.

Biodiversity and Ecology (Item 8 of the Agenda)

37. In relation to **Agenda Item 8(i)**: NSDC supports the applicant's proposed approach regarding the inclusion of access gates within the planned security fencing.
38. With regard to **Agenda item 8(ii)**: NSDC had no further queries or comments following the applicant's response and is satisfied with the level of survey effort undertaken to date. We welcome the Applicant's commitment to conducting pre-commencement surveys, which will help inform any potential protected species licensing requirements and establish the baseline for the Biodiversity Net Gain Assessment.
39. The applicant also confirmed their intention to produce a Habitat Management and Monitoring Plan (HMMP). We advised against using the current Natural England (NE) HMMP template, as it is highly technical and may not be user-friendly for those implementing the works. Additionally, we noted that the document is currently under review to improve its usability and functionality and the timescale for any future updates were unknown. The Applicant confirmed their willingness to provide the document in an alternative format. They explained that the use of the Natural England HMMP template was in response to a request from another statutory consultee and indicated that a mutually acceptable approach could be agreed upon during the proposed Steering Group meetings.

Cumulative assessment and timing of the project (Item 10 of the Agenda)

40. In respect of cumulative assessment, NSDC confirmed that we did not have a concern with the 'long list' of developments, but that we are seeking further dialogue with the Applicant on the shortlist carried forward for further assessment and the interrogation of the methodology for how decisions have been made in this regard. NSDC suggested further direct discussions with the Applicant should take place and any further updates provided in a further iteration of the Statement of Common Ground.